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## **The Bluebook Citation Companion Guide: Demystifying Policy Citations for Education Researchers**

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### Abstract

As higher education policies change, so do the targets of education research.

Researchers in higher education are responsible to be aware of those policy changes in their state or in the nation and then to conduct research into the various impacts of recent or forthcoming policy changes. Responsible research in this area, like all areas of research, requires clarity, transparency, and fidelity to ethical reporting standards. Education researchers typically follow guidelines from the *Publication Manual of the American Psychological Association*. APA style covers some laws and policy references but mainly refers to guidelines from *The Bluebook*—a guide for legal researchers—for guidance on abbreviations, state statutes, and other more specialized types of legal texts information. This can be intimidating for non-legal scholars, like education policy researchers. In this manuscript, we offer a tutorial, commentary, and examples of how to navigate and read *The Bluebook* and how to create legal citations.

**Keywords:** education policy, citation guidelines, higher education, research

Policies and changes to policies surrounding developmental education (DE) in postsecondary institutions have increased in recent years (Complete College America, 2012; DE Working Group 2018; H.B. 0226, 2022). For example, Texas requires that students be assessed for college readiness and then subsequently placed into the correct intervention, but the policy outlining these steps changed in 2012, 2013, and 2018 (TEX. EDUC. CODE ANN. § 4.55, 2018) (amended 2012, 2013, 2018). Notable changes include the use of multiple measures for a more holistic system of placement for students who do not meet the

state's definition of college ready. In 2012, a provision created the Texas Success Initiative Assessment (TSIA). This new provision was enacted to make the TSIA the only college readiness assessment with board approval (TEX. EDUC. CODE ANN. § 4.56, 2013) (amending TEX. EDUC. CODE ANN. § 4.56, 2003). However, in 2020, the provision was updated to remove the TSIA and replace it with the TSIA version 2.0, along with new requirements (TEX. EDUC. CODE ANN. § 4.56, 2020) (amending TEX. EDUC. CODE ANN. § 4.56, 2003).

Additionally, a provision outlining required components of DE programs stated that DE program must come from research-based practices for their interventions, assessment, support services, as well as other components (TEX. EDUC. CODE ANN. § 4.61, 2020). Though the original provision was created in 2012, it was updated soon after in 2013 with more changes—with the largest change to come from H.B. 2223 (2017). H.B. 2223 made the implementation of corequisite instruction models mandatory for 25% of non-exempt students for the 2018–2019 academic year, and then added another 25% each academic year until corequisite implementation was 100% in the 2021–2022 academic year. These changes only occurred in Texas, but other states are seeing high frequencies of change in their DE policies as well (Hodges et al., 2020).

Other substantial shifts happening in higher education as a whole are impacting the way our institutions function and—in some cases—what we can teach and what support we can offer students. Currently, 85 anti-DEI bills targeting support services, content, and funding have been introduced across 28 states since December 2022, and 14 of those bills have become law (Chronicle Staff, 2024). Recently, H.B. 261 (2024) was passed by the 65th legislature in Utah. This law prohibits employers from

asking questions about experience or commitments to DEI during interviews, requiring training related to DEI, and creating DEI service offices. Other bills attack funding related to DEI initiatives, retention programs, or personalized support for minoritized or underrepresented students. Some bills, like the recently introduced H.B. 2567 (2024) from Missouri, would allow individuals who feel they have been impacted by or witness to DEI language, policies, or programs to sue the college in question. Research from the National Association of Foreign Student Advisors found that anti-DEI policies have negatively impacted international student recruitment, student support, student mental health, and staff morale (Toner, 2024).

With great change comes the opportunity for great research. Many of us in the field of DE—whether we are in the classroom, administrative positions, learning centers, or advising offices—are continuously researching the effectiveness of new policy guidelines and new instructional modalities, such as corequisite coursework. In addition to conducting research, there are those of us who are writing theoretical pieces questioning or praising the foundations of some of these policies, while others are simply discussing policies in their conference presentations. Regardless of our views on the policies that we research, write about, and speak on, most of us have one shared concern when it comes to this topic—*how the heck do we even correctly reference policies for professional work?*

Though the *APA 7th edition manual* gives clear and easy to follow guidance for some legal references, it does not offer a comprehensive guide. In fact, *APA 7th edition* states that “for the sake of brevity, only United States and United Nations legal examples are provided in this chapter” (American Psychological Association, 2020,

p. 355) and subsequently advises that researchers use *The Bluebook: A Uniform System of Citation* (*The Bluebook*, 2020) for things such as state codes, statutes, and policies; state bills and resolutions; and memorandums. Each of these state specific items found in *the Bluebook* affect DE policy and are often the subjects of our professional work. Therefore, it is vital that we know how to reference these important legal items properly. This article will present a detailed and annotated guide for using *the Bluebook* to reference the many kinds of documents not found in the *APA 7th edition*.

### **Styling and Formatting**

This section will give an overview of various styling and formatting guides from *The Bluebook*, particularly those that may be unfamiliar to most APA users. This portion will cover newer formatting like the use of section symbols (§), the use of small caps to appropriately represent the correct typeface for statute abbreviations, and the use of en dashes or hyphens.

### **Section Symbol**

When looking for or citing a statute, there are a few elements that serve as signposts. One of the most important signposts are section numbers, denoted by the symbol “§”. This symbol is combined with a combination of title and chapter locations to show readers where you found your information.

A second signpost for you when looking at statutes, particularly those compiled into an annotated collection, is a table of contents of sorts that exists to guide you where you need to be.

For example, to find higher education related statutes in Georgia, you

will need a combination of titles, chapters, and section to obtain what you need. Georgia’s compilation of statutes (<https://tinyurl.com/GA-code-ann>) includes a total of 53 titles ranging from agriculture all the way to wills, trusts, and estates administration. To find, for example, the statute that established the authority to create and maintain junior colleges in Georgia, you will need to narrow down what section of the annotated code is needed to get that information. All education codes will be in title 20. Then, you will go to

chapter three for postsecondary education and look for any sections denoting junior college related content. Once there (<https://tinyurl.com/junior-ga-college>), you will use a combination of the title, chapter, and statute numbers to create your section citation, which in this case would be § 20-3-132.

See Figure 1 for an example of what you may see online and where the title, chapter, and section information can be found.

**Figure 1**

*Annotated Screenshot of Example Georgia Code*

*Note.* Figure produced from GA. CODE ANN. § 20-3-132 (1984).

The screenshot displays the Georgia Code page for § 20-3-132. At the top, the title "O.C.G.A. § 20-3-132" is centered. Below it is a "Copy Citation" button. A note states "Current through the 2023 Regular Session of the General Assembly." The breadcrumb navigation path is: "Official Code of Georgia Annotated > TITLE 20 Education (Chs. 1 – 18) > CHAPTER 3 Postsecondary Education (Arts. 1 – 13) > Article 4 Junior Colleges (§§ 20-3-130 – 20-3-136)". Red arrows point from the labels "Title Number" and "Chapter Number" to the "20" and "3" in the path, respectively. Below the path is the section title "20-3-132. Authority to establish and maintain junior colleges." followed by a horizontal line and the text: "Every city, county, county school system, independent school system, or other political subdivision of the state possessing a power to tax, which shall possess the requisite powers under the Constitution and laws of this state may either alone or in combination with any other such city, county, county school system, independent school system, or other political subdivision of the state establish, maintain, and operate one or more junior colleges under the terms of and subject to this article." Below this text is another horizontal line and the "History" section, which lists: "Ga. L. 1958, p. 47, § 3; Ga. L. 1983, p. 3, § 53; Ga. L. 1984, p. 22, § 20." A red arrow points from the label "Section Number" to the "132" in the section title. Another red arrow points from the label "Annotation" to the "20" in the history text.

## Typeface

Typeface is another important part of *The Bluebook* styling. Whereas in APA titles of books may be in italics, *The Bluebook* requires small caps as the method of identifying statutes. The name of codes should also be put into small caps. The difference between regular and small caps typeface can be seen below:

**Regular case:** Ga. Code Ann. § 20-3-132 (1984).

**Small caps:** GA. CODE ANN. § 20-3-132 (1984).

When in doubt, just try to match the font type that your state is using in *The Bluebook* examples. Additionally, Rule 2 “Typeface for Law Reviews,” provides more guidance for when to use italics, small caps, etc. titles, chapters, and volumes are not part of the title of statutes or codes; therefore, they are not in small caps. So, for example, DEL CODE ANN. tit. 13, § 1301 (1999), does not have tit. (the abbreviation for title) in small caps. You will not need small caps for bills, resolutions, or other types of legislative materials.

## Dashes

Another formatting suggestion is to double check whether or not you are using an en dash only in the appropriate places. Though *The Bluebook* prefers (as does *APA 7th*) the use of en dashes for a range of numbers, legislative forms require a hyphen. Ensure that punctuation remains as printed regarding legislation.

**Correct:** GA. CODE ANN. § 20-2-154 (2006).

**Incorrect:** GA. CODE ANN. § 20–2–154 (2006).

## Alphabetizing References

Additionally, placing codes or statutes alphabetically in your reference list can be a challenge. For the above Georgia code from 2003, you would simply alphabetize using the G as a guide first, then the A, and so on. However, some legal citations will have a number first. For example, the format for general and specific laws in the state of Texas are formatted as:

<year> TEX. GEN. LAWS <page no.>

Additionally, Tennessee Administrative Registers are referenced as:

<vol. no.> TENN. ADMIN. REG. <page no.>  
(<month year>)

According to *APA 7th edition*, when a reference item begins with a number, it is alphabetized *according to the spelling of the number* (p. 306, section 9.49). Therefore, if one wanted to reference a Texas drunk driving penal statute from 1925 (as you often do), it would be the following:

1925 TEX. CRIM. STAT. 802.

The resulting citation would then need to be placed in your reference list as if it were written as “nineteen twenty-five.,” thus placing it between articles from authors Jan Neuburger (Neuburger, J.) and Jan Norton (Norton, J.).

## Special Keys

The *APA 7th edition* often requires that citations include special characters or symbols that are not commonly found on your keyboard. *The Bluebook* is no different. Here is a quick list of hotkeys for Windows and Mac computers that can be used for easy

access to commonly used characters for legal citations:

Windows:

§: Alt + 0167

En dash: Alt + 0150

Em dash: Alt + 0151

Small caps: Ctrl + Shift + K

Mac:

§: Option + 6

En dash: Option + hyphen

Em dash: Option + shift + hyphen

Small Caps: Command + Shift + K

## Section Guide

Some of the most important clues for deciphering *The Bluebook*, as well as state citation guidelines, will be found in the section of white pages in the citation guide. These sections—known as Rules and denoted by the letter R followed by number—cover a variety of codes, statutes, documents, and language needed to use the citation guide successfully. In the portions of this manuscript that follow, we will be discussing the purpose and guidelines given in these rules.

### 12.3 Current Official and Unofficial Codes, p. 123–125

#### *12.3.1 Additional Information, p. 123–124*

Bluebook Rule 12 covers the citation of statutes. Particularly, Rule 12.3.1 provides guidance for citations of current official and unofficial codes. *The Bluebook* gives you examples of state codes, but not all states are included in each rule. For rule 12.3.1, the Bluebook provides examples from Delaware and Nevada. These examples are very basic and show what the state statute citations would look like if the title number and the section were included. For

example, DEL CODE ANN. tit. 13, § 1301 (1999) is for Delaware Code Annotated from Title 13 Section 1301. Annotated simply means that there are annotations included with the statutes at the bottom of the page. Table 1.3 in *The Bluebook* provides a comprehensive list of the titles, codes, and court rules for every state, including the District of Columbia. This table will show you how to cite specific codes from other states, using the basic examples from rule 12.3.1 as a guide.

The date of enactment or enforcement can usually be found at the bottom of a statute. The 21st edition of *The Bluebook* introduced a new convention when citing the date of a statute. Previously, you would include the date for the current statute. Now, the date is considered “optional” for federal statutes. Although you will not be using federal statutes as frequently, it is important to note this change because some—but not all—states have adopted this convention. You may see citations to codes without a date in your research. Just know that including the date is not incorrect; it is “optional.” For the purposes of this paper, we are choosing to include the date; thus, you will see the date included for statutes in effect. Additionally, APA citations typically have dates associated with both the in-text and reference citations; therefore, including dates with your legal citations will be less confusing for APA readers and journal reviewers.

You will see a date that indicates when the statute was passed, an “effective date,” “amended date,” or even a “revised date.” Let’s look at the example from *The Bluebook* again:

DEL CODE ANN. tit. 13, § 1301 (1999).

How you cite the code depends on the version you want to cite—one that is

currently in force or a previous version that has since been amended, revised, or repealed. Frequently, you will just be citing to the current code. However, if an amendment is important for a comparison, you will cite the amendment in a parenthetical. For example, if the statute was amended in 2020, you would cite the statute in effect, and then you would cite the old version of the statute in a parenthetical. It will look like this:

DEL CODE ANN. tit. 13, § 1301 (2020)  
(amending DEL. CODE ANN. tit. 13, § 1301,  
1999).

### ***12.3.2 Year of Code, p. 125***

When trying to interpret which date to give for a statute you are referencing, the final bullet for Rule 12.3.2 will be the most helpful. It gives:

OKLA. STAT. tit. 10, § 7303-1.7 (1998 &  
Supp. 2005) (effective July 1, 2002).

Notice that there are three dates here. The first is the date that the bill/statute was codified or passed. Codified means that the law has been added to the code. Remember that even though we live in the digital age, these citations are for physical books. The second date indicates when the statute was published in supplementary material, usually called a “pocket part.” The pocket part is a physical booklet attached to the physical code book, if we actually had the book. The effective date is listed separately at the end because though the statute became law in 1998, legislators decided that it should come into effect sometime in the future. This statute did not become effective until July 1, 2002. This may be relevant for some of the education policies that you will be referencing because many laws will be passed during legislative sessions, but they

likely will not require enforcement until the beginning of the next academic year. Most changes do not occur mid-semester. If a law or change is passed in the middle of the academic year, then an effective date for a future academic year will be set to be less disruptive for institutions. A future effective date also gives time for professional development for faculty. The extra time also allows for higher education coordinating boards to interpret responsibilities for colleges and universities.

### **Legislative Materials: Bills and Resolutions, p. 135–137**

This section has guides for the unenacted bills or resolutions (legislation that was proposed but never passed) and enacted federal bills and resolutions (which we usually refer to as a statute), which will likely not be necessary for this project; however, part c covers state bills and resolutions. The complication here is that you will need to reference the legislative body, the session number (for example Texas is in its 88th legislative session), and the year of the legislative session when the bill or resolution passed. The example given is:

H.R. 189, 145th Gen. Assemb., Reg. Sess.  
(Ga. 1999).

This means that it was House Resolution 189 with the 145th General Assembly, and it was voted on and enacted during a regular session. Sessions can be regular or special. This legislative session was also in Georgia (Ga.) and took place during 1999. Tables 6, 9, and 10 of *The Bluebook* contain a guide for abbreviations.

Figure 2 illustrates where you may find information regarding resolution numbers, effective dates, or assembly/legislative session numbers.

**Figure 2***Annotated Screenshot of Georgia House Resolution*

GA HR1167 | 2019-2020 | Regular Session  
 Georgia House Resolution 1167 (**Prior Session Legislation**)  
 GA State Legislature page for HR1167

**Status**  
**Completed Legislative Action**  
 Spectrum: Partisan Bill (Republican 6-0)  
 Status: Passed on August 5, 2020 - 100% progression  
 Action: 2020-08-05 - Effective Date  
 Text: Latest bill text (Enrolled) [PDF]

155th Georgia General Assembly

1st	January 14, 2019 – April 2, 2019
2nd	January 13, 2020 –

Note. Figure produced from H.R. 1167 (Ga. 2020).

The above house resolution would be referenced as such:

H.R. 1167, 155th Gen. Assemb., Reg. Sess. (Ga. 2020).

**Unpublished and Forthcoming Sources, p. 169–174**

**17.2.3 Letters, Memoranda, and Press Releases, p. 170**

Memoranda (memorandums) and press releases are going to be very important. Memos can inform the policy and are important for tracking intent of legislators. Sometimes you will see that a policy or directive from a legislator is only referenced within a memorandum. Executive orders (often accompanied by a speech and/or a written order)—unlike a memorandum—orders carry force of law. However, some memos will document

approval of a piece of policy and are effective as references, particularly when it comes to board or regent policies. The example given in this section is:

Memorandum from the Ad Hoc Comm. On Women & Clerkships to the Faculty of Yale Law Sch. 14 (Feb. 13, 1991) (on file with author).

With memoranda, you mostly want to say, “memorandum from [person or organization] to [person or organization]” and then give the month, date, and year. Table 13 in *The Bluebook* contains abbreviations for institutional names (some schools have official abbreviations, e.g., Georgetown is abbreviated “Geo.”). You will also likely want to add a URL in the place of “on file with author” if you have found it online (as you most likely will).

### 17.2.6 Speeches and Addresses p. 171–172

This section covers published and nonpublished speeches. However, when possible, it is much easier to find a transcribed or audio version of a speech online and then try to follow APA 7th guidelines. Rather than using Bluebook to reference Greg Abbott’s State of the State Address for 2021, simply reference this website instead (<https://gov.texas.gov/news/post/governor-abbott-delivers-2021-state-of-the-state-address>). Most speeches like this are put out as “Press Releases” on government webpages, and APA 7th has guidelines for this on pages 331 and 395. Speeches, such as State of the State addresses from

governors, are common sources for policy shifts, initiatives, or legislative direction.

### Tables

#### *Table 1.3, p. 242–298*

This is where you will find the unique ways in which states have decided they want their statutes and such formatted. This is where *APA 7th* is lacking in direction the most. These tables can be a bit confusing. For example, Figure 3 models what you may see when looking at Table 1.3 for Wyoming in *The Bluebook*, while Figure 4 models what you will see when looking for a particular statute.

### Figure 3

*Example Wyoming Statutes Annotated Chart*

**Statutory compilations:** Cite to WYO. STAT. ANN. (published by LexisNexis), if therein.

➤ Wyoming Statutes Annotated (LexisNexis)      WYO. STAT. ANN. § x-x-x  
(<year>)

The “x-x-x” is the Title-Chapter-Section. And the <year> would be when the statute passed.

### Figure 4

*Heading for Wyoming Statutes*

**2013 Wyoming Statutes**  
**TITLE 21 - EDUCATION**  
**CHAPTER 18 - COMMUNITY COLLEGES**  
**ARTICLE 2 - COMMUNITY COLLEGE COMMISSION**  
**21-18-202. Powers and duties of the commission.**

*Note.* Figure produced from WYO. STAT. ANN. § 21-18-202 (2013).

Reference List: WYO. STAT. ANN. § 21-18-202 (2013).

In text: (WYO. STAT. ANN. § 21-18-202, 2013)

Some states, like Texas, ask you to specify the related subject of a statute. Page 287 outlines the subject abbreviations for the various sections of the Texas Code (e.g., Educ. for Education, Lab. for Labor).  
Format:

TEX. <SUBJECT> CODE ANN. § x (<Year>).

For example, suppose you wanted to reference the relevant definitions for the Texas Success Initiative that exists within the Texas Administrative Code.

Figure 5 contains a screenshot of the appropriate Texas statute.

### Figure 5

*Example Texas Administrative Code*

<b>Texas Administrative Code</b>	
<b>TITLE 19</b>	<b>EDUCATION</b>
<b>PART 1</b>	TEXAS HIGHER EDUCATION COORDINATING BOARD
<b>CHAPTER 4</b>	RULES APPLYING TO ALL PUBLIC INSTITUTIONS OF HIGHER EDUCATION IN TEXAS
<b>SUBCHAPTER C</b>	TEXAS SUCCESS INITIATIVE
<b>RULE §4.53</b>	Definitions

**Source Note:** The provisions of this §4.53 adopted to be effective December 3, 2003, effective November 21, 2013, 38 TexReg 8195; amended to be effective September 4, effective February 28, 2018, 43 TexReg 1059

*Note.* Figure produced from TEX. EDUC. CODE ANN. § 4.53 (2003) (amended 2018).

Notice that the subject can be found as the title header, and that the final entry in the screenshot above is the section that the definitions can be found in. Also, notice that the source note begins with an effective date of December 3, 2003 and ends with an effective date of February 28, 2018, due to various amendments over the years. This means that you ought to include the initial effective date and the revised effective date. Your citation would be:

Reference list: TEX. EDUC. CODE ANN. § 4.53 (2003) (amended 2018).

In text: (TEX. EDUC. CODE ANN. § 4.53, 2003/2018)

### *Table 6, p. 304–307*

Table 6, or T6, is where you will find abbreviated case names. Only use these abbreviated citations if they save substantial space and the resulting citation is unambiguous in context. However, for those of us that are not legal scholars, T6 mainly serves as a means to translate abbreviations that we may come upon while researching education policy.

See Figure 6 for an example of the Table 6 layout in *The Bluebook*.

**Figure 6***Table 6 Example*

▸Academi[ic, y]	Acad.	▸Communication	Commc'n
▸Administrat[ive, ion]	Admin.	▸Community	Cmty.
▸Administrat[or, rix]	Adm'[r, x]	▸Company	Co.
▸Advertising	Advert.	▸Compensation	Comp.
▸Agriculture[e, al]	Agric.	▸Computer	Comput.
▸Alliance	All.	▸Condominium	Condo.
▸Alternative	Alt.	▸Congress[ional]	Cong.

*Table 9, p. 501–502*

Table T9 offers a list of words commonly found in legislative documents and their corresponding abbreviations. Like the previous table, this can be a handy guide

for those of us that may find ourselves tripping over abbreviations within education policy documents.

See Figure 7 for an example of the Table 7 layout in *The Bluebook*.

**Figure 7***Table 9 Example*

▸Annals	Annals
▸Annual	Ann.
▸Assembly[man, woman, member]	Assemb.
▸Bill	B.
▸Committee	Comm.
▸Concurrent	Con.

*Table 10.1, p. 502–509*

Table 10.1–10.3 contains geographical locations and their corresponding abbreviations. For our purposes, Table 10.1 is the only immediately necessary table—as it contains U.S. states, cities, and territories.

See Figure 8 for an example of the Table 10.1 layout in *The Bluebook*.

**Figure 8***Table 10.1 Example*

States			
▸Alabama	Ala.	▸Hawaii	Haw.
▸Alaska	Alaska	▸Idaho	Idaho
▸Arizona	Ariz.	▸Illinois	Ill.

**Conclusion**

In conclusion, *The Bluebook* citation format, while comprehensive and daunting, can be integrated with APA citation format with little additional effort. This companion guide is intended to be a starting point for your legal research as a non-legal scholar. Remember, the true purpose of any citation is to direct your reader to the original source—so aim for clarity rather than perfection if you find yourself becoming overwhelmed with creating your references. *APA 7th* simply refers to *The Bluebook* for the majority of legal citation formatting. Due to the nature of *The Bluebook* being a citation system rather than a style guide, legal citations amount for an APA user to being consistent with your own formatting choices in your writing. Hopefully, by using a combination of this guide and *The Bluebook* rules and tables, the task will have been made more manageable, so that education researchers can spend more time responding to the implications of education policy rather than creating the references for such policies.

**References**

American Psychological Association. (2020). *Publication manual of the American Psychological Association* (7th ed.). <https://doi.org/10.1037/0000165-000>

*The bluebook: A uniform system of citation* (21st ed.). (2020). Harvard Law Review Association.

Chronicle Staff. (2024). *DEI legislation tracker*. Retrieved March 16, 2024. <https://www.chronicle.com/article/he-re-are-the-states-where-lawmakers-are-seeking-to-ban-colleges-dei-efforts>

Complete College America. (2012). *Remediation: Higher education's bridge to nowhere* (ED536825). ERIC. <https://files.eric.ed.gov/fulltext/ED536825.pdf>

Developmental Education Working Group. (2018). *Developmental education: Recommendations to improve postsecondary student success*. <https://tinyurl.com/y6vro2x6>

H.B. 0226, 102nd Gen. Assemb., Reg. Sess. (Ill. 2022).

H.B. 261, 65th Legis., Gen. Sess. (Utah 2024).

H.B. 2223, 85th Leg., Reg. Sess. (Tex. 2017).

H.B. 2567, 102nd Ge. Assemb., 2nd Reg. Sess. (Mo. 2024).

Hodges, R., Payne, E. M., McConnell, M. C., Lollar, J., Guckert, D., Owens, S., Gonzales, C., Hoff, M. A., O'Donnell Lussier, K., Wu, N., & Shinn, H. (2020). Developmental education policy and reform: A 50-state

snapshot. *Journal of Developmental Education*, 44(1), 2–17.

TEX. EDUC. CODE ANN. § 4.55 (2012)  
(amended 2018).

TEX. EDUC. CODE ANN. § 4.56 (2012)  
(amended 2020).

TEX. EDUC. CODE ANN. § 4.61 (2012)  
(amended 2020).

Toner, M. (2024). *Countering the 'chilling effect'*. National Association of Foreign Student Advisers.  
<https://www.nafsa.org/ie-magazine/2024/5/2/countering-chilling-effect>

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