

This article addresses the legal and policy effects of the United States Supreme Court's landmark Second Amendment decision in *District of Columbia v. Heller* on those public colleges and universities that seek to regulate firearm possession on campus. The article explains how the Court interpreted the text and history of the Second Amendment in *Heller* and suggests steps that counsel can take to prepare for judicial and legislative efforts to limit regulation of possession on campus. These steps focus on the statutory issues of pre-emption and concealed weapons, the emerging constitutional issue of incorporation, current litigation on the related issue of public housing regulations, and practical legislative strategies. The article concludes that although *Heller* has been used to launch certain judicial and legislative challenges against college and university policies, institutions can withstand these challenges. Even if the Second Amendment is incorporated against the states, colleges and universities can defend their campus policies against concealed and non-concealed weapons if the institutions have clear state statutory delegations of firearm regulatory authority. Such express delegations will likely defeat both statutory arguments based on pre-emption and constitutional arguments based on individual rights.