Description of Policy

Summary

In 2011, the Virginia General Assembly passed House Joint Resolution No. 625, (Appendix A), requesting the Virginia Department of Education (VDOE) to study the nature and effectiveness of local school divisions' anti-bullying policies. Beginning in 2005, Virginia school boards have been required to include bullying as a part of character education according to § 22.1-208.01 of the Code of Virginia (Appendix B). As well, school boards are to include bullying as prohibited behavior in their student codes of conduct, according to § 22.1-279.6 of the Code of Virginia (Appendix B).

In June, 2011, Henrico County Public schools amended their policy to include bullying according to P6-05-014 (Appendix B). This policy defines bullying behavior and recommends dispositions for bullying, cyber bullying, and harassment infractions.

Policy Type

Fowler describes regulatory policy as “formalized rules expressed in general terms and applied to large groups of people. They either reduce or expand the alternatives available to those regulated” (Fowler, 2013, p. 216). Although no federal law exists that directly affects bullying, there are federal civil rights laws that protect students from harassment. These include Title IV and VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, and the Individuals with Disabilities Act (IDEA). A school that fails to respond appropriately to harassment of students based on a protected class may be violating one or more civil rights laws enforced by the Department of Education and the Department of Justice, and is at risk of losing federal funding.
In the statutory regulations, anti bullying rules and regulations are defined: bullying and harassment are prohibited behaviors outlined in district student codes of conduct, and character education programs are mandated across the state.

In the district regulations, bullying, cyber bullying and harassment are clearly defined and recommendations for disposition are suggested.

**Legal Issues Relevant to Policy**

**Constitutional Law**

Although no federal anti-bullying law exists, there are plenty of statutory laws around the nation that work to curb bullying and its consequences. Some educators and advocates are questioning if these school bullying laws go too far, placing unreasonable demand on educators and violating students’ First Amendment right to free speech. In Connecticut and Massachusetts, cyber bullying laws exist that punish students for online comments or messages that create a hostile environment or disrupt school. Some view this as a violation of the bully’s First Amendment right to free speech. The U.S Supreme Court ruled in Morse v Frederick that students can, under certain circumstances, face discipline for actions that occur away from school grounds. However, this has not been applied to the Internet. Another Supreme Court case, Davis v. Monroe County Board of Education, held a school district accountable for failing to take action on a sexual harassment claim it knew about.

Conflict also occurs in the Circuit Courts. The Third U.S. Circuit Court of Appeals ruled a Western Pennsylvania school violated the First Amendment by punishing a student for creating a Facebook page defaming a teacher. However, a Fourth U.S Circuit Court of Appeals ruled that a school was within its rights for disciplining a
student who had started a MySpace page attacking other students. In each of these examples, a school district’s policy was challenged on constitutional grounds.

**Federal Law**

As mentioned earlier, no federal law exists specifically to curb bullying in schools. In 2013, Senator Bob Casey (D-PA) reintroduced the Safe Schools Improvement Act (SSIA), an act that would solidify the requirement for schools to address bullying and hold them accountable to collect data on the incidence and response. Federal bullying prevention legislation has been introduced every year since 2003. Support has grown over the ensuing ten years, however, the bill now languishes in the Senate Health, Education, Labor, and Pensions committee and according to government trackers has a 1% chance of being passed (https://www.govtrack.us/congress/bills/113/s403).

Nevertheless, while federal laws do not specifically address bullying per se, a school or district may be charged with violation of First Amendment, Title IX of the Education Amendments of 1972, and other laws aimed at protecting an individual's right to equal protection.

Students who engage in certain acts associated with bullying may be suspended or expelled from a school or district, as well as face civil fines and criminal penalties, including jail time, depending on the specific violation.

School districts may also face civil law penalties, in the form of hefty monetary fines, arising out of a failure to prevent or punish certain types of behavior by students within their district.
State Statutory Law

Virginia is one of the forty-nine states that have passed laws to address bullying in schools. There are several different laws addressing the issue of bullying which requires school districts to include bullying in school codes of conduct. The most pertinent law, §22.1-279.6 (Appendix B), instructs the Virginia Board of Education to establish guidelines and develop model policies for codes of conduct to aid local school boards in the implementation of such policies. The guidelines and model policies include standards for hazing, threats, intentional injury of others, cyber bullying, harassment, and intimidation. The Code of Virginia, §22.1-208.01 (Appendix B), also requires school boards to provide character education on bullying to students.

State Board of Education Regulations

To help address and prevent bullying in public schools, a model policy was developed and adopted by the Board of Education. The Model Policy to Address Bullying in Virginia’s Public Schools provides information to assist local school boards in formulating policies to help prevent bullying and procedures to report, investigate and intervene when bullying behavior occurs.

This model policy was developed as a result of the 2013 Virginia General Assembly amended Code §22.1-276.01 (Appendix B) to define bullying. School divisions must, at a minimum, use the following definition in their local anti-bullying policies and procedures:

Bullying means any aggressive and unwanted behavior that is intended to harm, intimidate, or humiliate the victim; involves a real or perceived power of imbalance between the aggressor or aggressors and victim; and is repeated over time or causes severe emotional trauma. ‘Bullying’ includes cyber bullying. ‘Bullying’ does not include ordinary teasing, horseplay, argument or peer conflict.
The board-approved document expands on this bullying definition by addressing different types of bullying and describing the potential ramifications for all those involved in bullying incidents. Bullying prevention and intervention practices and strategies are described. In addition, information on reporting, investigating and recording incidents and the necessary notifications for parents and law enforcement are detailed.

The need for additional guidance and training was identified in a study conducted by VDOE at the request of the 2011 General Assembly. VDOE’s findings were presented to the 2012 General Assembly and can be found in the document titled, *Study of the Nature and Effectiveness of Virginia School Division’s Anti-bullying Policies*. This study reviews and compares anti-bullying measures in the student codes of conduct of each school division, compares existing policies with the department’s model policy for codes of student conduct, and determines if improvements to existing policies are warranted, in order to more effectively combat bullying in Virginia public schools.

**Case Law**

In the case, *Kowalski v. Berkeley County Schools*, the 4th Circuit Court of Appeals favored with the defendants and, because the case was tried in a Virginia court, the decision holds for both Virginia and West Virginia (home of the defendant) school districts.

As background, Kowalski was a high school student who was suspended for creating and posting to a webpage that ridiculed a fellow student. She brought action against the West Virginia school district and school officials, alleging that the suspension violated her free speech rights under the First Amendment and her due process rights
under the Fourteenth Amendment. The United States District Court for the Northern District of West Virginia granted summary judgment in favor of the defendants. The student appealed and the 4th Circuit Court of Appeals Circuit judge held that the defendants did not violate the student's free speech rights by suspending her for creating and posting to the webpage, and that the defendants did not violate the high school student's due process rights by suspending her, without a hearing, for her conduct.

It is a bedrock principle of the First Amendment that the government may not prohibit the expression of an idea simply because society finds the idea itself offensive.

However, while students retain significant First Amendment rights in the public school context, their rights are not equal to those of adults. Because of the special characteristics of the school environment, school administrators have some latitude in regulating student speech to further educational objectives.

Conduct by a student, in class or out of it, that disrupts class work or that is disorderly or disruptive or invades the rights of others is not protected by the constitutional guarantee of freedom of speech.

A recent case, M.D. v. School Board City of Richmond, was decided in March of this year. M.D.’s complaint alleges that the School Board is liable under Title VI and Title IX for its administrator’s response to alleged race and gender-based student-on-student harassment M.D. endured while enrolled at Summer Hill Elementary School (“Summer Hill”) from January, 2013, through April, 2013. During this three-month period, M.D., a six-year old African-American male, was a target of verbal and physical assaults and theft by his peers. He was mocked for failing to fight back and repeatedly called “gay.” M.D. became increasingly emotionally distressed and feigned illness to
avoid school. In April, his parents withdrew him from Summer Hill and moved him to another school in the area.

In the original case brought by the parents against the District Court, the parents represented themselves. The District Court found the Richmond School District and the two administrators concerned to be not liable. The parents then joined with Amicus Curiae, a Lesbian and Straight Education Network, to appeal the case in the Fourth Circuit Court of Appeals. The decision was to affirm in part, vacate in part, and remand with further instructions. These instructions allow the child 60 days to retain further counsel and file an amended Title IX claim. The Title VI claim was removed. As of this time, no further action has been taken by the plaintiff.

A recent case, Haskins v. Appomattox County School Board, is currently being decided in the Lynchburg Circuit Courts. In this case, the mother of a 12-year old is suing after two teenagers bullied her son on a school bus. She is suing both the school district and the bus driver for $8.3 million in compensatory and punitive damages. The prosecution alleges that the parties were aware of the bullying, but did nothing to stop or prevent it. A transcript of the bus surveillance video shows the two teenagers hitting the boy, yelling, and using racial slurs. Documentation also includes an incident where a cigarette lighter was used to burn the defendant. Details regarding the arguments and dissents are currently not publicly available, due to the case being still under litigation. The last public record of the case is its movement to the Lynchburg Circuit Court system and a record on February 7th of this year of a resolved hearing. Final disposition is currently not available.
So far, 44 states, including Virginia, have enacted anti-bullying statutes. The statutes detail procedures and responsibilities for dealing with bullying. But they still provide school districts and officials with immunity from causes of action for damages. Bullying suits are brought under state tort laws, federal statutes or constitutional theories such as equal protection or due process. Because of the difficulties in bringing bullying suits in state courts, many of these cases are filed as racial or sexual harassment cases in federal court, alleging Title VI or Title IX violations, according to several plaintiffs' lawyers. Each of the three cases described above include either racial or sexual harassment claims.

**Research Issues Relevant to Policy**

**Theories**

In the mid-1980s, seminal researcher Dan Olweus, Ph.D., retired professor of psychology at the University of Bergen, Bergen, Norway, developed the following definition of bullying: "A student is being bullied or victimized when he or she is exposed, repeatedly and over time, to negative actions on the part of one or more other students (Olweus, 1993).”

Bullying can take many forms: physical such as hitting or kicking, verbal such as threats or insults, social such as spreading false rumors, religious or ethnical, homophobic, sexual, and electronic such as cyber bullying.

Policies to frame anti-bullying efforts are increasingly common and are now mandatory in countless school districts across the nation, including Virginia’s.
Zero Tolerance Model

The first zero tolerance policies appeared in schools with the primary purpose of addressing issues of violence and drugs (Roberge, 2012). They later became adapted to address school bullying in the Gun-Free School Act of 1994. One of the characteristics of zero tolerance is that all students who commit a given offense receive the same treatment. Research into the effectiveness of zero tolerance anti-bullying policies uncovered serious problems in that the consequences seemed to target certain ethnic groups and that administrators were misusing the policies to address a wider range of behaviors than bullying infractions (Martinez, 2009).

Early Intervention Model

Early intervention policies are gradually replacing zero tolerance policies (Roberge, 2012). The foundations of early intervention policies in schools are as follows: create a culture of respect and compassion, implement character education and social skills training, and tailor the intervention for the bullying behavior to the incident and all individuals involved in the incident (Skiba & Peterson, 2000). Early intervention also assumes continual monitoring and documentation of the bullying incidents, along with a restorative justice approach to relieve the harm caused by the bullying. Restorative justice takes place when victims take an active role in the process, while offenders are encouraged to take responsibility for their actions.

In terms of policy development, research concludes that different levels of prevention and intervention are needed on a systemic level. In addition, a process of continuous monitoring and review of the policies are necessary in order to ensure that
they are meeting the changing needs of today’s school environments (Glover, Cartwright, Gough, & Johnson, 1998).

**Scholarly Research**

Although bullying among children is hardly a new phenomenon, it has received recent increased attention by educators, legislators, policy makers, the media, and the general public. According to Limber (2003), the focus on bullying in recent legislation is likely attributable to two sources: a stronger research base describing the prevalence and effects of bullying and highly publicized reports from both the media and the U.S. Secret Service suggesting that many school shooters reported persecution, bullying, and harassment by their peers. In a supporting study, Kennedy, Russom, and Kevorkian (2012), reveal that 70% of all surveyed students reported being affected by bullying in school. Furthermore, of the 37 school shootings analyzed by the U.S. Secret Service’s National Threat Assessment Center, two-thirds of the shooters reported feeling bullied, persecuted, or threatened by others prior to the shooting (Kennedy et al., 2012).

The nature and prevalence of bullying in schools has also been under study and evaluation. Children bullied by their peers have issues with psychosocial functioning, physical health, academic work, and school attendance. Not only individuals, but the entire climate of a school can be seriously eroded by repeated and persistent bullying incidents (Limber, 2003).

Many states have statutes that require school policy concerning bullying. One of the most detailed is Connecticut’s which requires all school districts to develop policies that encourage reporting of bullying, require staff members who witness bullying to report it to administration, require administration to investigate reports of bullying,
include an intervention strategy to deal with bullying, include language related to bullying in codes of conduct, require parents of bullies and victims to be notified, and keep a public list of the verified acts of bullying (Limber, 2003). Georgia has one of the most punitive statutes, requiring each school board to detail a procedure by which any secondary student (grades 6-12) who commits a third physical bully offense must be sent to an alternative school (Georgia Code, 2001).

Schools across the nation differ in the content of their anti-bullying policy. Limber documents that many school districts now have some type of bully prevention program. However, most of these efforts are aimed at elementary and middle school aged children. A number of districts still don’t have a centralized bully prevention program, believing that problems with bullying are a rare occurrence, while other districts are uncertain how to proceed with bully policy development and problems with defining bullying behaviors (Limber, 2003).

Kennedy et al. (2012) found that most school policies focus on observing and controlling student behavior over promoting healthy relationships. They also noted that school districts fail to be mindful of Title VI of the Civil Rights Act of 1964, and Title II of the Americans with Disabilities Act of 1990 when creating a bully policy for their schools. In addition, they report that many school districts fall short when implementing tenets within their policies. They emphasize the importance of school districts designing and implementing research-based bully prevention programs.

There are established programs for both the bully and the victim. A widespread and reputable program based on the research of Dan Olweus offers treatment for bullies in the forms of anger management and self-esteem enhancement therapy. Olweus also
offers curricular approaches, along with programs like Bully Busters and Bully Free Classroom, that increase understanding, explore the effects of bullying on victims, teach strategies, and increase student understanding of bully behavior. One method that is avoided in bullying programs is mediation and conflict resolution. This type of treatment is deemed effective when conflicts are between peers of equal power, but not ones that involve victimization (Limber, 2003).

Another anti-bullying program that strives to influence the entire school climate is the use of young adult literature to address the issues surrounding bullying. According to a 2001 study released by the National Institute of Child Health and Human Development, more than two million school children in the United States are involved in bullying, as victim, bully, or bystander. Thus, according to Hillsberg and Spak (2006), school is the logical venue to tackle the problems associated with bullying. They also contend that if a school-wide effort to combat bullying is to be effective, it should include many elements that already exist in school, including classroom content.

According to renowned psychologist, Erik Erikson (1964), adolescents build a sense of identity during the teenage years in reaction to those around them. If students are isolated or victimized, their ability to create a healthy identity is diminished. Students are then unavailable for learning, thereby creating frustrations for teachers, parents, and the students themselves.

Hillsberg and Spak (2006) contend that the teaching of reading and writing is a fitting subject in which to address the emotional issues surrounding bullying. The ability to use literature to help understand the human condition can improve both literacy skills and peer relationships. Based on this premise, the authors created meaningful learning
experiences in literature. The goal was to develop a school-wide campaign against bullying that featured reading, discussion, and writing as its principal weapons against bullying. Criteria for choosing the stories for this program were that they contained memorable protagonists, engaging plots, and thematic material that empowered the victims of bullying.

Most research encountered emphasizes that establishing clear and consistent policies based on solid and current research while addressing bullying behaviors is critical to preventing bullying. Effective policies rely on consistent implementation of, and training for, the procedures involved.

**Interviews**

**Purpose**

Researchers gather information, analyze data, and interpret the data to address specific needs. In this assignment, qualitative data was obtained through the interviewing and recording of responses from twelve questions regarding the implementation and development of an anti-bullying policy in Henrico County Public Schools. According to Fowler, “Qualitative research designs involve the collection of verbal or pictorial data” (2013, p. 287). Fowler describes the qualitative data process as gathering numerous sources of information and then compiling the data to determine an outcome. In this study, the research group conducted an interview of an individual who was crucial to the revision and implementation of anti-bullying policy in a large school district. Data analysis reveals that the policy, while effective in some areas, is in need of revision and further evaluation in others.
Description of Procedure

During this study, an individual who serves as guidance director for Henrico County Public Schools was interviewed.

The interviewee was contacted by email to set up a face-to-face interview. Prior to the interview, the list of twelve questions was provided so that advance preparation could be conducted. The interview and ensuing conversation was recorded with digital software and shared in a secure electronic format among the study members. Answers to each question and the entire interview were assigned in segments to each study member for transcription. Each segment was then compiled into a single transcription document (Appendix E).

Profile of Interviewee

The interviewee had been a middle school teacher for five years before she took a two-year sabbatical to pursue a master’s degree in school counseling. In 2007, she began work at Deep Run High School in Henrico County, VA, as a school counselor. After six years at Deep Run, she moved to Hermitage High School as a School Counseling Director. Outside of her public school counseling position, the interviewee is a healing circle leader at Comfort Zone Camps where she works as a grief counselor. In addition, the interviewee currently serves on the Board of the Virginia School Counselor’s Association.

Data by Question

Question: How did the policy come about?

In terms of developing the Henrico County Public School district anti-bullying policy, the interviewee was part of the Coalition for Equitable and Inclusive Schools,
which was tasked with creating a more inclusive climate within the district schools. The Coalition was charged with providing monthly lessons on the topic of bullying, surveying stakeholders on the climate within school centered on inclusion and bullying, creating and holding a focus group including students, faculty, and community members to discuss inclusion and bullying, and then beginning to implement recommendations of the Coalition into the district curriculum. The actual anti-bullying policy statements that comprise the district policy are included in Appendix C.

One of the results of the stakeholder survey was the statistic of 48% of the respondents indicating that they had encountered some sort of bullying incident. The interviewee indicated that after “the county found out about the 48%, that is where the policy started and came about in Henrico County.”

**Question: What is the purpose of the policy?**

The interviewer stated that the primary purpose of the policy was for every student and faculty member to feel included in the school community-at-large. She also pointed out that inclusion helps attendance, grades, as well as promoting a decline in discipline referrals. She also referred again to the 48%, indicating that the hope was to start getting “better results” when surveying for bullying encounters in the schools.

**Question: What is your role with respect to this policy’s development and implementation?**

The word “implementer” came up a number of times during the interviewee’s response to this question. As mentioned earlier, she was on the original Coalition Team that generated the county anti-bullying interventions, including development of the
monthly lessons, conducting focus groups, and spearheading an anti-bully program at each school.

At Deep Run, during the first two years of implementation, the school participated in the Rachel’s Challenge program. Rachel was the first victim of the Columbine school shootings and her father put together a group named after Rachel that travels the nation speaking to schools through motivational assembly programs. Following the assembly, a group called Friends of Rachel is formed and is trained on how to make positive changes in the school.

The interviewee conducted the activities developed by Friends of Rachel for two years, including a chain of kindness that the entire school participated in during Homecoming Week. Then the interviewee pointed out that “Friends of Rachel died out, and we decided to go for a different route for the third year.” This included a Challenge Day, conducted at both Deep Run and Hermitage, where kids participated in groups based on the MTV show, “If you Really Knew me”. Almost every faculty member, along with 300 students, was involved. According to the interviewee, “…following Challenge Day, you could see a really big change of starting to stand up for kids who were getting bullied.”

Her role initially was as chairperson for the Challenge Day, and then later when serving as Director of School Counseling, she became more of a facilitator delegating the implementation of the event to a counselor and a teacher.
**Question:** Who were some other people or other groups interested in this policy?

The development of the anti-bullying policy was very much a work in progress, with program evaluations and revision conducted along the way. Involved in the original Coalition for Equitable & Inclusive Schools team were the interviewee, administrators, school counselors, and teachers. In addition, members of the district Staff Development team assisted in the creation of the faculty training sessions. Much of the preliminary training was conducted by the Virginia Center for Inclusive Communities.

Other groups involved in the implementation phase of the policy were the classroom teachers and school counselors. A forty minute advisory period within the school day was used to convey the lessons developed by the Coalition. Focus group input suggested that the lessons might be more beneficial and effective for the students if they were delivered by peers. Thus, the following year, peer leaders received training by the interviewee and they would then be prepared to deliver lessons in the classrooms with their peers.

**Question:** What kinds of things were considered as the policy was developed/implemented?

In addition to bullying, the ideas of inclusiveness also included an attention to religious sensitivity. The interviewee recalled that one of the first things that the Coalition did with teachers was to conduct religious sensitivity training, which is repeated each school year.

Lots of “self-exploration” was also conducted with the faculty members, with a focus on the fact that faculty did “not always mirror our student population”. Leaders
were identified during this self-exploration phase who would be available later to help coordinate and deliver the inclusion activities with the students.

From this phase, a mentoring program grew that the interviewee felt was a very influential and effective development of the inclusive program. This involved teacher mentoring of select students identified as potential victims of bullying, but who also had attendance or behavior problems that came from a fear of coming to school. These students would be assigned a one-on-one mentor who worked with them throughout the school year. Because of the success of the pilot program, it has been continued each year at every school.

**Question: What are some strengths of the policy?**

The interviewee contended that the biggest strength of the policy is that her district was actually doing something about the problem of bullying in Henrico County schools. Being at the high school level, she noted that there was a dearth of resources for anti-bullying curriculum for secondary level. As a member of the Board of Virginia School Counselors, she indicated that she went to a number of national conferences and she noted that there just wasn’t much out there. Therefore, the fact that her district was creating resources for use at the high school level was a great positive.

She also added that she found the collaboration between diverse staff members was an unexpected strength of the policy. As an example, she described the grant that had been awarded to her school’s library media specialist for creating a school-wide anti-bully experience centered around two pieces of literature, which the school would be reading. The authors of the literature would also be paying a visit to the school.
By focusing on “what you can do as opposed to telling people what they can’t do,” was a strength highlighted by the interviewee as she summarized what she considered strengths of the inclusion policy.

**Question: How did you get “buy-in” for the policy?**

The interviewee was emphatic in her answer to this question when she responded, “the kickoff”! Rachel’s Challenge and the Challenge Day were crucial to getting everyone involved and invested in improving the school climate as it relates to inclusion and bullying interventions. The pep rallies, assemblies and other events were impactful for both students and faculty, according to the interviewee.

**Question: What did the process look like for implementing the policy?**

The interviewee recalled that she “imagined the process to be a chance for people to really talk and communicate and give feedback about what they were seeing and what they were feeling and what they think the change could be”.

The goal was monthly small group lessons where members were allowed to express themselves. The interviewee described that in some classrooms it was like that, but that in others it was more like “let me get through this lesson and be done with this kind of thing”.

The impression was that there were successful components where the implementation of the policy was successful, but there were others where it did not live up to expectation.

**Question: Is there any language in the policy that you find bothersome?**

The interviewee did not have any problems with the language of the anti-bullying policy of Henrico County Public Schools.
Question: What is your perception of the success of the implementation of the policy?

The interviewee agreed that the anti-bullying program events were very successful immediately following the kick-off. For a month or two following a Rachel’s Challenge assembly or Challenge Day, you see positive changes. However, then this focus begins to “dwindle away”. She pointed out that this was to be expected with any big event, and she expects the same phenomenon following the bully book grant activities in the fall.

Success is dependent upon funding. The interviewee pointed out that programs such as Rachel’s Challenge and Challenge Day are expensive. Funding comes from sources such as the PTA or student organizations such as the SCA, or grants. Some of the funding even came out of the teachers’ own pockets because they were so moved by the program and wanted to see it continue.

Question: How will you know the policy is doing what it is intended to do?

The interviewee described several ways that the policy was being evaluated. The district continues to survey its stakeholders and the surveys indicate both areas of success and opportunity.

In addition, a pre and post assessment is conducted with each inclusion or anti-bullying lesson which tells which issues are being highlighted or brought into focus by the students. Teachers also provide anecdotal feedback on the success of the lesson and program events.
Discipline data is also an indicator that the programs are doing what they intend to do. The interviewee pointed out that there is a definite downward trend in the number of suspensions following the implementation of the lessons and programs.

When asked if there had been a change in the initial 48% of student exposure to bullying incidents, the interviewee indicated that she did not know.

**Question: Do you have anything else you would like to add?**

The remaining portion of the interview involved the interviewers asking follow-up questions.

**Follow-up Question One: What are some disciplinary actions against a bully?**

The interviewee responded that suspensions, both in or out of school depend on the severity of the infraction. She also indicated that the hardest part of dealing with bullying behavior is proving that it happened. As she pointed out, “Kids are very subtle and they are not going to do it (bully) when someone is watching. They’re going to hide behind a computer screen, or be as anonymous as the can”. She indicated that the administrators do the best they can, but it’s not always easy because there may not be any witnesses or willing bystanders to witness. Often, the victims of bullying fear retaliation and will not report the infractions. Even parents are often unwilling to name bullies for fear their child will be further endangered.

**Follow-up Question Two: What is your opinion of zero tolerance policies on bullying?**

The interviewee believed that Henrico County Schools “probably” has a zero tolerance policy. She points out that the difficult thing is to define or identify what
bullying is. The resource officer is a good resource to utilize, especially in cases of cyber-bullying that occur outside of school.

**Follow-up Question Three: Has there been any litigation against the school system relating to bullying?**

The interviewee was not aware of any litigation. However, she did refer to cases where parents removed their children from school because of bullying. These children were then either home-schooled or sent to private or another public school. She also alluded to variances that had been issued to send students to other schools within the county because of bullying incidents.

**Emerging Themes**

A dominant theme that arose during the interview and ensuing discussion was the dichotomy between prevention and intervention strategies for bullying awareness and the consequences and disciplinary actions related to bullying incidents. The Henrico County anti-bullying policy (see Appendix C) includes very specific definitions of bullying behavior and cites a list of dispositions that might be imposed on a student whose actions have been identified as bullying. However, there is not a published anti-bullying curriculum or program to circumvent the need for the identified dispositions. As noted in the interview, the Coalition for Equitable and Inclusive Schools has been charged with fostering a positive and inclusive environment within each school. In Henrico’s Five Year Strategic Plan, strategic goal 6 states all students will practice civic responsibility and good stewardship of resources within their community. Within this goal, an indicator reveals all schools will have a formalized Inclusive Communities Coalition that will
develop and implement activities that will promote tolerance, acceptance of differences, and bullying prevention.

However, as the interviewee highlighted in the discussion, each school is charged with creating its own programs which can be limited by lack of funding, stakeholder “buy-in” issues, and maintaining enthusiasm and participation in the programs developed.

A second emerging theme was the need for additional funding to support these programs. As noted in the interview, consultants, speakers, and authors can cost in the thousands of dollars to bring to a school. Training staff is costly, along with the allocation of time and additional resources to complete the training. In the today’s tentative economic climate, funding for these types of programs is often not a priority. Grants and special funding from groups like the PTA can help, but are not adequate to completely fund and maintain the anti-bullying programs over time.

A final emerging theme is the necessity of these types of programs and accompanying policies to become part of the school culture in order for them to thrive and survive. As the interview noted on several occasions, the initiatives were greeted with enthusiasm and implemented to great fanfare, but would often lost steam over the course of time. Each successive school year necessitated the need for evaluation, revision and change. Like Henrico County Public Schools, across the nation, schools are facing issues that relate to bullying and forging new strategies and approaches to dealing with these issues in the classroom and the school community.
Conclusions

Analysis

Social Value of Order

Ideas, beliefs, and values shape the way people define problems and understand policy. Some values can be characterized as general social values. These values are prevalent across society and are held by virtually all people, regardless of their ethnicity, religion, race, or gender. One of these values is order. Order is important to nearly all cultures in both the Western and Eastern hemispheres. People want and need to live in a society that is orderly and safe and one in which both their body and property is secure. Order is also of great importance to educators and education policy. Safe and orderly schools are a priority and concern across the nation and order is considered a prerequisite for the mission of student learning.

As detailed by the interviewee, all stakeholders understand the importance of a school climate where members feel valued, included, and safe. If a child feels threatened in school, it can often result in academic decline, poor attendance, emotional disturbance, and behavior issues.

Democratic Value of Fraternity

Education values reflect the democratic values in our society. One of the democratic values, the value of fraternity, speaks to the ability to view one another as a brother or sister, to have a sense of responsibility for one another, and to feel like one can turn to others for help. This value lies at the center of a strong and effective anti-bullying policy. Ideally, students would be tolerant and respectful of each others’ differences. Realistically, this is not the case. Students are teased or harassed for a variety of reasons.
A bystander, or witness, is a culpable part of the bullying incident. If a bystander ignores or walks away from the harassing behavior, he is part of the problem. If a bystander steps in to either confront the bully or try to diffuse the situation, he is part of the solution. Being able to rely on bystanders as support for the victim is an example of the democratic value of fraternity.

When designing an anti-bullying program such as the one described by the interviewee, it is crucial to arm bystanders with strategies that they can employ when confronted with a bullying incident. By relying on an individual’s inherent sense of fraternity, the bystander becomes an empowered and crucial support for the victim.

**Success of Implementation**

Successful implementation of a school policy depends on developing and maintaining both the will and the capacity of the intermediaries. Intermediaries are the implementers to whom the primary implementers delegate the responsibility of carrying out the policy (Fowler, 2013). Central office and school administrators should be able to steer districts, schools, and teachers through the challenging tasks involved when changing culture to meet new expectations (Fowler, 2013). According to Fowler, the school board acts as the primary implementer while school officials such as principals, lower level administrators, and teaching staff act as intermediaries. The intermediaries carry out the day-to-day requirements as defined by the mandates of the policy. Implementation takes place in phases over a prescribed course of time.

In Henrico County Public Schools, bullying is defined and dispositions are delineated in the policies and procedures. However, the implementation of the anti-bullying and inclusion program is highlighted in the Five Year Strategic Plan and tasked
to principals, counselors, and other staff to implement at each individual school. The interviewee, a member of the Coalition, was an active participant in the Rachel’s Challenge, Challenge Day events, and monthly lessons centered on tolerance, inclusion, and anti-bully strategies. These activities contributed to the day-to-day requirements of the policy and its implications.

First Generation Research

First generation research focuses on the difficulties associated with implementing a policy (Fowler, 2013). Implementing policy is a difficult process. In an educational setting, an individual or team must identify a problem area such as was identified by the Henrico survey results of 48% student exposure to some sort of bullying incident. Next, a plan to solve the problem must be created. Bullying was already defined and dispositions were already listed in the policy and procedures manual. However, the goal and mission of the inclusion and anti-bullying standards were driven by a goal in the Five Year Strategic Plan. A Coalition was formed and plans were adapted to each individual school and its culture.

Obtaining buy-in for the plan is a crucial next step. The interviewee described how key teacher leaders and student leaders were identified and trained in the skills necessary to conduct the monthly lessons. Entire schools planned and participated in Challenge Days ensuring ownership of the problem and a commitment to a solution.

Two further aspects of first generation research are materials and time. As mentioned earlier, funding and materials were provided primarily from sources such as grant awards or organizations such as the PTA. Time was set aside by the district to allow the Coalition to develop and present a plan to the individual schools. Within each school,
time was provided for the program leaders to meet and begin to implement, while also providing time during the school day for students and staff to participate in program events.

**Second generation research**

Second generation research studies the success or failure of implementation while attempting to assess why some policies are fully implemented and others are not (Fowler, 2013). The Henrico County Public School inclusion and anti-bullying programs are deemed successful by public communication on the district website. According to this source, schools across the county are seeing declines in discipline referrals, suspensions, and academic performance following the implementation of the Coalition’s plan at each school. It is difficult; however, to determine success at each individual school as hard data was not broken down in this manner. Available online; however, is a document describing the individual behavior support plan, which includes reference to bully prevention and inclusion for each school in the county.

The interviewee did confirm that the two schools in which she worked, Deep Run High School and Hermitage High School, did see a noticeable decline in referrals, suspensions, and absences following the implementation of Challenge Day and monthly inclusion lessons, but she was unable to provide hard data.

**Third Generation Research**

Third generation research broadens and deepens our understanding of the implementation aspects identified by the first and second generation researchers (Fowler, 2013). This type of research considers the implementers to be advancing through a learning process. The implementers are charged with reviewing the policy from its
implementation stage and ensuing pilot programs to determine in which direction the district should go to improve the policy and document greater success. As this information is gathered, it is crucial that the implementers use it to revise, change, or add to the policy with an eye to the future.

According to the interviewee, the Coalition continues to meet to evaluate the success of the programs as a whole and within her school; the leader teams meet to decide on a plan for the upcoming school year. One area of concern that emerged from the transcript of the interview is the hesitation when asked for hard figures that might substantiate the success of the program. For example, when the interviewee was asked if current surveys indicate that the 48% students reporting exposure to bullying had declined, she responded “I don’t know. I’ve never compared, so I don’t know.” This suggests that her focus is primarily on implementation and less on evaluation of success. Unless more attention is paid to data collection and analysis, this might spell trouble for the future viability of the initiatives.

Implementation Analysis Framed with Interview Data

**Success of Implementation**

As noted by the interviewee, there is a dearth of anti-bullying programs for high schools, with most of the prevention and intervention programs directed at elementary and middle schools. Yet, Henrico County’s Coalition for Equitable and Inclusive Schools charged each school, at each level, to develop a meaningful anti-bullying program designed to become a part of the school’s culture. Much of the success of the implementation of Challenge Day and monthly class meetings, she credits to the
collaboration among colleagues and the buy-in on part of students and staff. She noted that “the collaboration was an unexpected strength of the policy.”

Fowler (2013) notes that adequate support is needed during the phase of mobilizing for implementation of a policy. This includes considering the level of support among key implementers, including an ongoing dialogue with all of the individuals who have been asked to play a role in implementation. In Henrico County, the individual schools and Coalition committees were empowered to respond to the needs of their particular schools, and as evidenced in the individual school-wide behavior support plans, a myriad of programs and approaches to reach inclusion and combat bullying were designed at each school. From weekly classroom meetings centered on the Olweus Bullying Prevention program to maintaining a bullying database to track problem behaviors, Henrico County schools are demonstrating creativity and relevance when implementing the mandated inclusion policy.

**Challenges of Implementation**

One key concept from the research conducted for this paper continues to frame the analysis of the implementation success of the inclusion and anti-bullying program at Deep Run and Hermitage High Schools. The concept is that very few public schools maintain records of bullying incidents as separate from other altercations. Administrators report confusion over how to characterize behavior on discipline reports. Therefore, bullying is vastly underreported. The interviewee supported this assumption by her inability to provide data related to the significance of any decline in bullying or harassment at her school. By the inability to provide hard data to document successes or failures, a policy cannot continue to be effective into the future. According to Fowler
(2013), characteristics of an effective policy evaluation include determining the goals, selecting the indicators, developing data-collection instruments, collecting data, analyzing and summarizing data, report, and responding to recommendations. Ironically, the identification of a district need for the inclusion and bully programs was a statistic—that 48% or nearly one half of Henrico students reported exposure to a bullying incident. Despite good intentions, without accurate accounting of bullying incidents it would be next to impossible to evaluate the success or failure of the anti-bullying program.

**Evaluation of Effectiveness of Policy**

A good policy evaluation is “a systematic evaluation that tries to determine cause and effect relationships and rigorously measures the results of policy” (Fowler, 2013. p. 28). The programs implemented at each school under the auspices of the Coalition for Equitable and Inclusive Schools are moving just beyond the pilot stage, however the evaluation process will be applied in the following sections.

**Policy Evaluation Process**

The first phase of policy evaluation is a precise determination of the policy goals and objectives (Fowler, 2013). The goals for this policy are to allow all students to achieve at the highest possible levels, and in order for this to occur, every school should have a culture that is equitable and inclusive of all students. This goal is clearly expressed in the Five Year Strategic Plan.

The second phase is to select indicators. These indicators act as a measurement or signal that a goal has been reached (Fowler, 2013). The indicators within each school are data collected on the number of referrals or suspensions related to a bullying incident, survey results, anecdotal accounts, and attendance records. Determining the success of an
anti-bullying policy is not a clear-cut process. As indicated earlier, administrators are often confused on how to record disciplinary accounts involving bullying. Also, data such as discipline and attendance records may not show a direct correlation with attitude and experiences with bullying. Perhaps more meaningful might be the survey and anecdotal results. Questions directly relating to encounters with bullying and other forms of harassment or exclusion might elicit a clearer picture of what improvements have been made since the program implementation. An evaluation such as this that uses both quantitative and qualitative data is called holistic evaluation (Fowler, 2013).

The third step is conducting an evaluation using data collection instruments (Fowler, 2013). Data collection instruments would include spreadsheets and graphs of the survey results, and attendance and disciplinary numbers. In addition, a collection of anecdotes would include testimonials preserved in video format, such as the one that can be found online documenting the success of the Coalition’s programs in various schools.

School leaders should not wait until the summative evaluation is due to begin data collection (Fowler, 2013). It should be an ongoing process, with awareness by all stakeholders of the indicators that will be measured along the way. By collecting data throughout the implementation stages, school leaders have the opportunity to assess progress and make adjustments, as necessary. If a bully prevention program is working particularly well at one school, this knowledge can be collected and disseminated to school administrators so that they might begin incorporating the program in their own schools.

A crucial and later step in the evaluation process is the selection of evaluators. By selecting evaluators who are credible and respected and who will produce quality work
will add value to the program in the long run. Evaluators must also demonstrate a level of objectivity. Selecting program developers as the sole evaluators would be a mistake. They are invested in the success of the program they have created and may not be able to see weaknesses. In the case of assessing the success of the anti-bullying program at Deep Run and Hermitage High School, it might be beneficial for all student leaders and community leaders to work with educators and counseling professionals on a complete evaluation of the program. In addition, it might be equally beneficial to invite an outside expert on bullying in schools to evaluate the program and offer up a report based on current research and practice.

Summary

The inclusion and anti-bullying program that was developed to address a growing concern in Henrico County Public Schools is a work in progress. As the interviewee reported, the district is still in the developing stages of implementation. There have been many successes. Each school in this large county has a program in place to help all students feel included and safe from bullying. Schools are being creative and relevant in their solutions. For example, Hermitage’s grant-supported school-wide book program involves engaging students in literature centered on bullying and includes author visits. In addition to the creativity and relevance, schools are beginning to collect data. Several schools reported in the individual behavior support plans that they were beginning to collect data on specific bullying incidents. As research shows, this is not the current norm in schools across the United States. Henrico County is showing leadership in this area.

There are opportunities for continued improvement, however. Only a handful of schools are collecting quantitative data specific to bullying incidents and using them to
tailor their programs. Data is not readily available, as evidenced by the interviewee (a school counselor director) who was unable to produce any hard data to support the success of the programs at Deep Run and Hermitage.

In addition, the interviewee reported that support or enthusiasm for the monthly lessons was dwindling. In some cases, she felt that teachers just considered it “one more thing” for them to do. Maintaining awareness and buy-in is crucial to the continued success of the program.

Nevertheless, Henrico is off to an impressive start in their efforts to eradicate bullying in the schools and to create a school culture where each and every student is included and accepted.
References


Haskins v. Appomattox County School Board (Lynchburg Circuit Court February 7, 2014), Virginia Courts Case Information System CL130078063-00.


Kowalski v. Berkeley County Schools (4th Circuit Court of Appeals).


M.D. v. School Board City of Richmond (4th Circuit Court of Appeals).


Appendix A

HOUSE JOINT RESOLUTION NO. 625
Requesting the Department of Education to study the nature and effectiveness of local school divisions' anti-bullying policies. Report.

Agreed to by the House of Delegates, February 4, 2011
Agreed to by the Senate, February 22, 2011

WHEREAS, beginning in 2005, local school boards in Virginia have been required to include the topic of bullying in their codes of student conduct, with electronic means of bullying added in 2009; and

WHEREAS, Virginia public school students also receive instruction on bullying prevention as part of their character education requirement; and

WHEREAS, studies show that between 15 and 25 percent of U.S. students are bullied with some frequency, while 15 to 20 percent report they bully others with some frequency; and

WHEREAS, both students who bully and students who are bullied are more likely to skip school and drop out of school; now, therefore, be it

RESOLVED by the House of Delegates, the Senate concurring, that the Department of Education be requested to study the nature and effectiveness of local school divisions' anti-bullying policies.

In conducting its study, the Department of Education shall (i) review and compare anti-bullying measures in the student codes of conduct from each school division, (ii) compare existing policies with the Department's model policy for codes of student conduct, and (iii) determine if improvements to existing policies are warranted, in order to more effectively combat bullying in Virginia's public schools.

All agencies of the Commonwealth shall provide assistance to the Department for this study, upon request.

The Department of Education shall complete its meetings by November 30, 2011, and shall submit to the Governor and the General Assembly an executive summary and a report of its findings and recommendations for publication as a House or Senate document. The executive summary and report shall be submitted as provided in the procedures of the Division of Legislative Automated Systems for the processing of
legislative documents and reports no later than the first day of the 2012 Regular Session of the General Assembly and shall be posted on the General Assembly's website.
Appendix B

§ 22.1-208.01. Character education required.

A. Each school board shall establish, within its existing programs or as a separate program, a character education program in its schools, which may occur during the regular school year, during the summer in a youth development academy offered by the school division, or both. The Department of Education shall develop curricular guidelines for school divisions to use in establishing a character education program through a summer youth development academy. The purpose of the character education program shall be to instill in students civic virtues and personal character traits so as to improve the learning environment, promote student achievement, reduce disciplinary problems, and develop civic-minded students of high character. The components of each program shall be developed in cooperation with the students, their parents, and the community at large. The basic character traits taught may include (i) trustworthiness, including honesty, integrity, reliability, and loyalty; (ii) respect, including the precepts of the Golden Rule, tolerance, and courtesy; (iii) responsibility, including hard work, economic self-reliance, accountability, diligence, perseverance, and self-control; (iv) fairness, including justice, consequences of bad behavior, principles of nondiscrimination, and freedom from prejudice; (v) caring, including kindness, empathy, compassion, consideration, generosity, and charity; and (vi) citizenship, including patriotism, the Pledge of Allegiance, respect for the American flag, concern for the common good, respect for authority and the law, and community-mindedness.

Classroom instruction may be used to supplement a character education program; however, each program shall be interwoven into the school procedures and environment and structured to instruct primarily through example, illustration, and participation, in such a way as to complement the Standards of Learning. The program shall also address the inappropriateness of bullying, as defined in § 22.1-276.01.

This provision is intended to educate students regarding those core civic values and virtues that are efficacious to civilized society and are common to the diverse social, cultural, and religious groups of the Commonwealth. Consistent with this purpose, Virginia's civic values, which are the principles articulated in the Bill of Rights (Article I) of the Constitution of Virginia and the ideals reflected in the seal of the Commonwealth, as described in § 1-500, may be taught as representative of such civic values. Nothing herein shall be construed as requiring or authorizing the indoctrination in any particular religious or political belief.

B. The Board of Education shall establish criteria for character education programs consistent with the provisions of this section. The Department of Education shall assist school divisions in implementing character education programs and practices that are designed to promote the development of personal qualities as set forth in this section and the Standards of Quality and that will improve family and community involvement in the public schools. With such funds as are made available for this purpose, the Department of Education shall provide resources and technical assistance to school divisions regarding successful character education programs and shall (i) identify and analyze effective character education programs and practices and (ii) collect and disseminate among school divisions information regarding such programs and practices and potential funding and support sources. The Department of Education may also provide resources supporting professional development for administrators and teachers in the delivery of any character education programs.

C. The Department of Education shall award, with such funds as are appropriated for this purpose, grants to school
boards for the implementation of innovative character education programs, including a summer youth development academy.

(1998, c. 725; 1999, c. 944; 2003, c. 777; 2005, cc. 461, 484, 839; 2012, c. 703; 2013, c. 575.)

§ 22.1-279.6. Board of Education guidelines and model policies for codes of student conduct; school board regulations.

A. The Board of Education shall establish guidelines and develop model policies for codes of student conduct to aid local school boards in the implementation of such policies. The guidelines and model policies shall include, but not be limited to, (i) criteria for the removal of a student from a class, the use of suspension, expulsion, and exclusion as disciplinary measures, the grounds for suspension and expulsion and exclusion, and the procedures to be followed in such cases, including proceedings for such suspension, expulsion, and exclusion decisions and all applicable appeals processes; (ii) standards, consistent with state, federal and case laws, for school board policies on alcohol and drugs, gang-related activity, hazing, vandalism, trespassing, threats, search and seizure, disciplining of students with disabilities, intentional injury of others, self-defense, bullying, the use of electronic means for purposes of bullying, harassment, and intimidation, and dissemination of such policies to students, their parents, and school personnel; and (iii) standards for in-service training of school personnel in and examples of the appropriate management of student conduct and student offenses in violation of school board policies.

In accordance with the most recent enunciation of constitutional principles by the Supreme Court of the United States of America, the Board's standards for school board policies on alcohol and drugs and search and seizure shall include guidance for procedures relating to voluntary and mandatory drug testing in schools, including, but not limited to, which groups may be tested, use of test results, confidentiality of test information, privacy considerations, consent to the testing, need to know, and release of the test results to the appropriate school authority.

In the case of suspension and expulsion, the procedures set forth in this article shall be the minimum procedures that the school board may prescribe.

B. School boards shall adopt and revise, as required by § 22.1-253.13:7 and in accordance with the requirements of this section, regulations on codes of student conduct that are consistent with, but may be more stringent than, the guidelines of the Board. School boards shall include, in the regulations on codes of student conduct, procedures for suspension, expulsion, and exclusion decisions and shall biennially review the model student conduct code to incorporate discipline options and alternatives to preserve a safe, nondisruptive environment for effective teaching and learning.

C. Each school board shall include in its code of student conduct prohibitions against hazing and profane or obscene language or conduct. School boards shall also cite in their codes of student conduct the provisions of § 18.2-56, which defines and prohibits hazing
and imposes a Class 1 misdemeanor penalty for violations, that is, confinement in jail for not more than 12 months and a fine of not more than $2,500, either or both.

D. Each school board shall include in its code of student conduct, by July 1, 2014, policies and procedures that include a prohibition against bullying. Such policies and procedures shall be consistent with the standards for school board policies on bullying and the use of electronic means for purposes of bullying developed by the Board pursuant to subsection A.

Such policies and procedures shall not be interpreted to infringe upon the First Amendment rights of students and are not intended to prohibit expression of religious, philosophical, or political views, provided that such expression does not cause an actual, material disruption of the work of the school.

E. A school board may regulate the use or possession of beepers or other portable communications devices and laser pointers by students on school property or attending school functions or activities and establish disciplinary procedures pursuant to this article to which students violating such regulations will be subject.

F. Nothing in this section shall be construed to require any school board to adopt policies requiring or encouraging any drug testing in schools. However, a school board may, in its discretion, require or encourage drug testing in accordance with the Board of Education's guidelines and model student conduct policies required by subsection A and the Board's guidelines for student searches required by § 22.1-279.7.

G. The Board of Education shall establish standards to ensure compliance with the federal Improving America's Schools Act of 1994 (Part F-Gun-Free Schools Act of 1994), as amended, in accordance with § 22.1-277.07.

This subsection shall not be construed to diminish the authority of the Board of Education or to diminish the Governor's authority to coordinate and provide policy direction on official communications between the Commonwealth and the United States government.

§ 22.1-276.01. Definitions.

A. For the purposes of this article, unless the context requires a different meaning:

"Alternative education program" includes night school, adult education, or any other education program designed to offer instruction to students for whom the regular program of instruction may be inappropriate.

"Bullying" means any aggressive and unwanted behavior that is intended to harm, intimidate, or humiliate the victim; involves a real or perceived power imbalance between the aggressor or aggressors and victim; and is repeated over time or causes severe emotional trauma. "Bullying" includes cyber bullying. "Bullying" does not include ordinary teasing, horseplay, argument, or peer conflict.

"Disruptive behavior" means a violation of school board regulations governing student conduct that interrupts or obstructs the learning environment.

"Exclusion" means a Virginia school board's denial of school admission to a student who has been expelled or has been placed on a long-term suspension of more than 30 calendar days by another school board or a private school, either in Virginia or another state, or for whom admission has been withdrawn by a private school in Virginia or another state.

"Expulsion" means any disciplinary action imposed by a school board or a committee thereof, as provided in school board policy, whereby a student is not permitted to attend school within the school division and is ineligible for readmission for 365 calendar days after the date of the expulsion.

"Long-term suspension" means any disciplinary action whereby a student is not permitted to attend school for more than 10 school days but less than 365 calendar days.

"Short-term suspension" means any disciplinary action whereby a student is not permitted to attend school for a period not to exceed 10 school days.

B. For the purposes of §§ 22.1-277.04, 22.1-277.05, 22.1-277.2, and 22.1-277.2:1, "superintendent's designee" means a (i) trained hearing officer or (ii) professional employee within the administrative offices of the school division who reports directly to the division superintendent and who is not a school-based instructional or administrative employee.

(2001, cc. 688, 820; 2013, c. 575.)
Appendix C

P6-05-014 Bullying
(New June, 2011)
A student, either individually or as part of a group, shall not harass or bully others. Prohibited conduct includes, but is not limited to, physical, verbal, or written intimidation, taunting, name-calling, insults, exclusion, threatening body posture, and any combination of prohibited activities. Prohibited conduct includes verbal or written conduct consisting of comments regarding the race, gender, religion, physical abilities or characteristics, or associates of the targeted person or group.

A. Repeated, unwanted negative overtures and actions over time toward a person or persons are prohibited.
B. Bullying methods (repeated) such as verbal abuse, social exclusion or isolation, physical abuse, intimidation, lies, rumors, sexual inferences, robbery, damaged personal items, threats, racial attacks, and bullying through electronic devices, will not be tolerated.
C. Electronic bullying and/or cyber bullying-related activity of any nature, and which is obscene, pornographic, threatening, or otherwise inappropriate, including, but not limited to, email, instant messaging, web pages, and use of hardware and/or software which substantially disrupts or interferes with the safety and welfare of the school and its students, are strictly prohibited, even if such uses/actions take place off school property (i.e., home, business, private property, etc.).
D. All aspects of the Acceptable Use Policy/Regulation apply to this section on bullying.
E. Conveying by gestures, notes, or verbal comments with the intent to cause bodily/emotional injury or to deprive a student of his rights, is prohibited.
F. The willful use of physical or verbal threats or physical abuse intended to result in an involuntary transfer of money or property to another student, is prohibited.
G. Cursing, using abusive language, teasing, hazing, or other acts of intimidation, are prohibited. This includes, but is not limited to, any verbal, written, physical or mental teasing, threat of bodily injury or use of force directed toward and based upon a person’s race, religion, sex, sexual orientation, national origin, disability, or intellectual ability.

Refer to R6-05-014, "Guidelines Related to Bullying"
R6-05-014 GUIDELINES RELATED TO BULLYING
(Revised June, 2012)
BU1 Bullying
BU2 Cyber Bullying
HR1 Harassment (Non-Sexual) – physical, verbal, or psychological

Recommended Dispositions – one or more may apply:

Student Conference
Parent Contact
Conference with Parent
Instructional Support Services Intervention
Detention
Alternative School Program
Suspension Intervention Program (Elementary)
Suspension – Required Mediation/Conflict Resolution Training
School Resource Officer/Law Enforcement Agencies
Court Referral
Community Services
RECOMMENDATION TO THE SCHOOL BOARD FOR EXPULSION
Appendix D

Interview Questions

1. How did this policy come about?
2. What is the purpose of the policy?
3. What is your role with respect to this policy’s development and/or implementation?
4. Who were some other people or other groups interested in this policy?
5. What kinds of things were considered as the policy was developed or implemented?
6. What are some strengths of the policy?
7. How did you get “buy-in” for the policy?
8. What did the process look like for implementing the policy?
9. Is there any language in the policy that is bothersome to you?
10. What is your perception of the success of implementation of the policy?
11. How will you know the policy is doing what it is intended to do?
12. Do you have anything else you’d like to add that hasn’t been talked about?
Transcription of Interview

**LB:** Tell us your background and how this policy came about with your involvement.

**RZ:** My background. I was a middle school teacher for 5 years. One year at Stonewall Jackson Middle School in Hanover County and four years at Oak Knoll middle school. Went back to school to get a school counseling master’s degree so took 2 years off to do that. And in 2007, started working at Deep Run High School as a school counselor, was there for 6 years and then went to, um, got this job this summer as the school counseling director at Hermitage High School, so that is my background with bullying. I also, um, other things that are related, or not bullying, with my career. Other things related to my career that I do outside is I am healing circle leader at Comfort Zone Camps so I work with grief students who have dealt with grief and lost. Have done support groups with them. And I have done some counseling with them and am on the board of the Virginia School Counselors Association. So.

**LB:** And can you share with us your experiences, um, your involvement with creation, or implementing, or generating ideas on policies on bullying in the K-12 environment?

**RZ:** So when I was at Deep Run, I would say in 2000, I think it was summer of 2010, so the in 2009-2010 school year, each school at the high school level and I believe the middle level were asked to form a team, it was called a Coalition of inclusive Schools I believe was the official title of it. The coalition was formed to do a lot things. I think at first, it was going around like why are kids and faculty not feeling included in the environment so we did a lot of training and of kind self exploration that summer of 2010 and a lot of 2011 and we also had to do, we were charged by the county as a group; it was about 4 people from every school. It was a school counselor, at my school it was a school counselor, an administrator and two teachers. And we were charged with providing once a month lessons for our students to do at some point during the day with the topic of bullying. I believe the reason; actually, I know the reason, I don’t know if this is why it got started but a lot of stuff happened during that year regarding bullying. We do a survey every year for our students, faculty and parents. And the county found out that 48% of those surveys said that bullying was taking place in the school system. So that is where the policy started and came about in Henrico County. We were then charged, I was, as my position of being a school counselor was asked to do a focus group, one person at every school had to do a focus group and I was the person at Deep Run who brought a group of students together and talked about questions with a group of students about what do you think about 48% and things like that I know at my school it was “its only 48%?I would think more people have been a part of it.” So we were kind of doing what you are doing now, take the group, transcribe it, summarize it and turn all of that into the county. And then we started developing more of these bullying lessons that we had to do. So, the purpose of the policy I do know, I mean are we following questions?
LB: Can we deviate from our list for just a minute because Tracy is our K12 representative. Anjour, myself and Jay are all in higher education. So, for our benefit and learning experience, can you define bullying for us. And how it was defined moving forward with the policy.

RZ: Sure, bullying is repeated act to show power of one person over another so it is not a one time incident of a person kinda of trying to be powerful, superior or harmful in a way. So bullying can be in physical manner, its mostly not in a physical way. In the school system, it is usually aggression, like a lot of times leaving people out, making fun of them because they are different. It is a lot of verbal things as far as that and avoidance. Its more that type of bullying as opposed to any, there is not a lot of, we have not seen in my experience a lot of physical bullying like the kind you hear about on TV, nobody is putting a little kid’s toilet or anything like that. But it is happening more subtlety, a lot of cyber bullying is a big part of it so its more in that way as a opposed to a physical thing. More emotional, mental, verbal.

AH: What is the actual name of the policy? Is it called an anti-bullying policy?

RZ: I believe it was called the Coalition of Inclusive Schools. Something like that. I don’t remember the exact – it started in 2010. We stopped calling ourselves anything. We were just the group that did bullying lessons. But believe that was the name.

TA: Is it is incorporated into written policy? Could we ask for a copy?

RZ: I don’t know. That I don’t know. I do know there are rules against. We have disciplinary in our code of conduct against bullying. I don’t know I have ever, I am not really into reading the code of conduct so I don’t know the answer to that. Sorry. The coalition no longer meets and gets trained. That ended a couple of years after it started. But we have been told by the county that we are still responsible for doing anti-bullying.

LB: Thank you for the deviation. Back to the next question about the purpose.

RZ: The purpose of the policy is for every student and every faculty member to feel included in their community. It helps attendance, grades, discipline go down when everyone feels they have a place in the school system. And obviously to hope that in the surveys we started getting better results of bullying taking place and happening in the school.

LB: And what is your role with respect to this policy’s development and implementation?

RZ: So when I was at Deep Run in the first year that the policy took place, I was on the collation team so I was in on the training in the summer and different trainings throughout the year, I implemented the once a month bullying lessons, I did the focus groups, and at Deep Run, and at every school, every school had to have an anti bullying
program. The first couple of years, our kick off was Rachel’s Challenge. A girl Rachel, she was the first victim of the Columbine shooting and her father put together a group called Rachel’s Challenge and they go into schools and they speak to entire schools about bullying through an assembly program where they have very motivational speakers, they go through a presentation. The entire auditorium is in tears at the end of it. Then, a group is formed called Friends of Rachel and it becomes a club. They come back later in the day to get trained on how they are going to make changes in their school. So we used that to do our follow up on our anti-bullying lessons during the first few years. The Friends of Rachel was our anti-bullying group for our first few years at Deep Run. We did year one, year two of Friends of Rachel. We has the whole school signing pledges, we had students coming up with stuff on their own such as can we start our own chain of kindness where anytime somebody does a kind act, they get a link and they ended up wrapping around multiple times around our track at a football game. They did it in a parade I think. Our homecoming parade then wrapped it around twice. It was very awesome to see the kids really come together. I was not the club leader of Friends of Rachel but I was the implementer in making sure that it kept going with the classroom lessons. Then, Friends of Rachel kind of died out, we did the two years, you could start over at year one I guess. But we then decided to go a different route for the third year and we did Challenge Day. Challenge Day is, and we ended up changing the Friends of Rachel club to Deep Run Challenge. Challenge Day is a, and we do this program here at Hermitage as well, so it kind of carried over to what we do here. MTV used to have a show called If You Really Knew Me and its 100 kids, 30 faculty and you are with a group from CA that comes out and they really get deep down of if you really knew me, you would know that… And you have 2 minutes to share what you would know. So you learn things, like kids might have alcoholic parents or they might go home and not have food. All these different things going on in their lives where they get bullied and they this or they that, or they don’t have any friends. And, so you are learning that these kids might look this way on the outside or act this way but you don’t know what they have going on on the inside so why are we treating people differently and that sort of thing. So the thing with Challenge Day is that only 100 kids per day participate so we do it 3 days. So its 300 kids. At Deep Run, the first year, we do it, almost every faculty member almost was involved. I was the chair person of that whole thing so I put the whole thing together and that was our kick off. We didn’t do it until February so we did lessons, once a month lessons leading up to and got people really pumped about Challenge Day. And then we did follow up lessons after. At least the people that were involved, you could see a really big change of starting to stand up for kids who were getting bullied and things like that. So my role was a lot in the implementation of it, I guess. Not as much here because now I am the director and so I have a counselor and actually a teacher who do the Challenge Day piece of it. I will also say here, we have a library media specialist who wrote a grant for next year for anti-bullying month. We are getting, and it was approved, so we are getting money to bring in two authors that wrote books on bullying to come speak and do things for our whole faculty, not faculty, our student body. They wrote, one wrote a book on the female part of bullying and one was a male perspective of bullying so we will be doing that in October.
AH: What was the actual name of the policy? Was it called the anti-bullying policy?

RZ: It was the (pause) I believe it was called the coalition of inclusive schools. Something like that I mean, I don’t know I don’t remember the exact in 2010 we stopped calling ourselves anything we were just the group that did bullying lessons (laugh) but um I believe that was (pause) there are rules against it The coalition no longer meets and gets trained.

AH: You may have already answered this a little bit but um who were some of the other people (their roles, not names) or other groups interested in this policy? Um (pause) so I’ll speak mostly from the Deep Run perspective because I am definitely much more familiar and was involved with that a lot longer. Um Like I said the group was a administrator school counselor and two teachers um and then from the county level um the staff development group was the one that was put together what we were doing on the training level. We have a staff development department in Henrico so they were putting together the training and that sort of thing. The um there is an organization called something for inclusive communities I can probably find it [Jay – the Virginia Center for Inclusive communities] - yes thank you. The Virginia Center for Inclusive Communities did a lot of our primary training sessions. So that organization was very very involved from the beginning. Okay so um the Virginia Center for Coalition of Conclusive Community. [Jay restarted the tape]
I don’t remember where I was oh the staff development is the one who put together all of our lessons and then my teachers at my school we had extended study in which was in the middle of the day. It was a forty minute period and they were (pause) and that was the time period we were using. We had advising every Monday. Advising was when we were doing the lessons. Um we did learn from our focus groups with the students that the lessons would be better delivered from their peers as opposed to their teachers. So then the next year we ended up having peer leaders and we would train them one day and I was the person who did the training. We would train them together and they would go deliver the lessons in the classrooms with their classmates. So yea those are probably the people involved.

AH: What kinds of things were considered as the policy was developed/implemented?

RZ: Um I think one of the things (pause) well a lot of it was also not only bullying but inclusiveness was the big part of it and not just as far as religious sensitivity was a big part of it as well. Um so I remember the first thing the coalition had us do was a training for our teachers actually on religious sensitivity and that training did continue at my school every single year that I was there I did a training at the beginning of the year for teachers and just really of um how you treat students and how you talk and things you can do in the classroom things you can’t do as far as religion and inclusiveness and that sort of thing. So I think that a lot of people when they think of bullying it’s definitely a powerful person and not so powerful also another thing that was considered was a lot of self- exploration with faculty as well and making sure that our school sys like they did not always mirror our student population in making sure that we had some people that were leaders. Another thing that might have been developed out of this we did start a um
one on one mentor or a mentoring program in the county and I think that really helped a lot as well because students that would normally even be victims of bullying um but also have attendance, discipline and behavior problems attending usually came from the point that they had a fear of coming to school. Um when they got a one on one mentoring with an adult in the building that really helped that so the program has been continued in the county (pause) every school has that program.

AH: The next question is: What are some “stren” sorry I can’t seem to talk today. What are some of the strengths of the policy, but can you also give us some weaknesses too.

RZ: Un hum Um so strengths of the policy I think are um that you are actually doing something and you are not ignoring that there is a problem, and that bullying happens in school. I think that um one of the biggest weaknesses working from the high school level is there is not much out there for bullying in high school. Um middle schools, elementary schools, you can find I mean most probably not much in middle school definitely elementary school and probably some middle schools. You can find so many resources um (pause) I go to (pause) I mean so I am on the Board of Virginia School Counselors Association. I go to conferences a lot and I’ve been to the national conference and you just cannot find those resources. So the biggest weakness is just there is not a lot out there. And that’s why I thought it was great when our library media specialist came up with this grant because with these books like one of the books she shared with me that I started reading. I am like this is too elementary like it’s a great book about a boy who that was being bullied but he is going on to middle school. So we (pause) it’s not going to relate with our high school kids so then we found some high school books as well. So I think that would be the biggest like a lot of it we will did have to come up with from scratch how can we come up with a plan or how can we change a middle school plan and make it work for our students. And so it was a lot of brain power and we ended up doing a lot on it instead of keeping it focused on the negative of don’t do this don’t do this. What can we do to make it a more positive environment like with kindness acts of kindness and things like that which I think Rachel’s challenge really helped with that piece of it. Because it is what you can do as opposed to you keep telling people you can’t do this or you can’t do that. that was a strength too because really putting a positive spend on it.

AH: This is just a follow up question, why do you think um they don’t have anything out there in the literature for high school students?

RZ: I question this a lot from like publishing companies and stuff like that at these conferences selling stuff, and they always say well I think people think these problems end in middle school. Um, and unfortunately it doesn’t um it gets (pause) and in some ways it gets even worst because you have more technology and more ways for people to hide behind it. Oh I did forgot - I am sorry I know you are recording it. [She though Jay had to restart the tape, which he didn’t.] Every school has implemented by this policy (pause) a silence hurts website what this is on our main website and at every school is something called silence hurts and it is an anonymous way to report and bullying is one
of the main reasons they did it so. If you’ve seen something happening or somebody is being bullied but you’re not but you don’t’ want to be the tattle tale, it’s an anonymously way to report bullying. Also other things like drugs alcohol safety things like that but that’s been a really (pause) we have gotten a lot of reports through that my school here and there.

**RZ:** Did I answer your question?

**AH:** Yes you did thank you.

**JW:** How did you get buy-in for the policy?

**RZ:** The kickoff. I think from students and staff especially by doing Rachel’s Challenge and the Challenge Day, it made them very much made want to do something different. Um, I will say that Rachel’s Challenge was very impactful on our first year for our faculty and our students um, Challenge Day was the most impactful on the group since most every teacher at Deep Run did Challenge Day. So we have pep rallies, we had assemblies, we had all kinds of stuff. But I think those kick off events were really how we go the buy in.

**JW:** Ok, thank you. What did you imagine the policy process would look like once y’all started implementing the policy?

**RZ:** Long Pause/ Um, hmmm. I kind of imagined the monthly meetings, the monthly lessons to be very like a small group where you kinda sit in a circle, clear the desk and sit in a circle and get really down dirty and talk and really let kinds express themselves. And I think in some of my classrooms it was like that and in others it was like let me get through this lesson and be done kind of thing. Um, my imaging of it was a chance for people to really talk and communicate and give feedback and what they were seeing and how they were feeling and what they think the change could be and have it really come from the students.

**JW:** Ok, thank you. Is there any language in the policy that you find bothersome?

**RZ:** No. But like I said I have never read, like, an actual policy, but I don’t um think so. When I have read the administrative, like, this is what bullying is and this is your punishment for bullying, I don’t think so.

**JW:** And this is just a follow up question. Was there any part of the implementation process that you found bothersome or that you could have found improvement for?

**RZ:** Um, hmmm. I think we were constantly trying to improve it from the beginning and trying to figure out a way…I think the hardest part was trying to get the teachers to buy in to the once a month thing. For some teachers it is very comfortable for them to sit around and do counseling type stuff. For some teachers that is not their thing. And even more so in a high school, they are not always going to be the most touchy feely people in
the world. Ok, so to say “I need you to talk about bullying” and not about your content area, that was really hard for some teachers. So we actually learned, ok, we need to offer support. If you are uncomfortable with this let us know, we’ll put up support. So my counselors at Deep Run were all ready to be disbursed into different classrooms so they could help a teacher. And whether it be one time do they could so how it would be done or some of them every time cause they were just uncomfortable by it.

**JW:** Ok, thank you very much.

**TA:** What is your perception of the success of implementation of this policy?

**RZ:** (pause) I think that after the kick-off, it is very successful and you see a big change right away and then it kind of dies off (laughs) I think with anything you’re going to see that when you have such a big like I’m expecting that with the bullying grant we have in the fall. Every challenge day you see a change for a few weeks, even months or two, and then it just kind of dwindles away and people start like at first they’re like “let me stand up for you.” So I would say um it’s great. I wish we could do you know a lot of it is a funding issue. Like these programs are very expensive and I mean at Deep Run we had a little more money but not even that much money. I was getting money from PTA, SCA, I mean it wherever I could find money I was begging for money to do these programs. Um, and I know at Godwin after their teachers did it the first day the teachers who did it the first year funded the second one of the days the second year because they were so moved by it, but…

**JW:** You mean they funded it out of their own pockets?

**RZ:** They donated and funded it out of their own pockets.

**TA:** What is the funding for?

**RZ:** The like groups to come in on Rachel’s Challenge Day those are very expensive programs kind of the kick off like our bullying grant was a few thousand dollars to get the authors here and that sort of thing and pay their fees and travel and things like that. Um. So, I think that it is successful. I think that it’s, you know, it it always can be better but I think if you had more you’re kind of dealing with things that probably will never be fixed. Like making every teacher buy in and even every student buy in because some students are going to take it really seriously and other students are not so, yeah?

**TA:** This is somewhat of a related question how will you know the policy is doing what it is intended to do. I guess accountability?

**RZ:** Umm so the county still does the surveys every year and has since, so you we still get the results of those to know if that is looking good, looking better and that sort of thing. Um, I know that after every lesson that we did, we did a kind of pre post assessment of what went well, what improvement needed tell us the things that were going on in there like the teachers give us some feedback and that sort of thing. Um, and
then I think too with discipline data and just seeing that one of the big things that we noticed as trends since this has started is that our amount of suspensions and things like that has gone down in our school, but I mean…

**JW:** And that’s a good stopping part right there because I’m going to have to switch to a third, if you don’t mind (pause but maybe not it’s still going now (pause) sorry (laughter)

**RZ:** So, um, we definitely, I mean I go to administrative meetings here, I never did at Deep Run but we look at trends and suspensions and discipline data and that sort of thing and so overall in the county that kind of stuff has gone down, so.

**TA:** At the beginning you mentioned that 48%. Has that gone down? To compare…

**RZ:** I don’t know. I’ve never compared, so I don’t know. I mean I think it was a big eye opener for the county when that happened. I would assume it went down but I’ve never checked because you know they haven’t said “holy cow” again like (laugh) they kind of freaked out. We did the focus group like June, because they’re like you need to do this, you need to do this now, like we’re freaking out, so I think that it’s probably gone down.

**JW:** Alright, the last question is do you have anything else you’d like to add that hasn’t been talked about or I guess if we have any questions…?

**LB:** I have a follow-up question to what you mentioned earlier, um, you said that there’s not a specific anti-bullying policy.

**RZ:** I didn’t say that, I said “I don’t know”.

**LB:** Oh, you weren’t sure. And that most of this was included in the school codes of conduct. Um.

**RZ:** I do know that there is a code against bullying.

**LB:** OK, so what are some of the disciplinary actions um against the bully?

**RZ:** Um.

**LB:** If they’ve been reported.

**RZ:** suspension, like in school suspension, out of school suspension, um detention, anything like it is treated just like any kind of other incidence, I don’t think your first offence is gonna be like ten days out but it can get to that point if you keep doing what you’re doing. So, the hardest part with bullying is proving it. Kids are very subtle and they are not going to do it when someone is watching. Um, they’re going to hide behind a computer screen, they’re going to be as anonymous as they can. They’re going to do it, like, even when we find out, ok this is happening, at this time, this sort of thing, if there’s an adult around it’s likely not going to happen. Um, So, it’s a really challenging, challenging think to prove. Um, so I think the administration does the best they can with
it but it’s not always the easiest thing to say you’re a bully because there’s always not a lot of witnesses or nobody who’s going to stand up and a lot of bullies bullying situations they don’t want the retaliation if they did tell and that’s why we provided the anonymous way to report but still they’re still like they would know I told so I’m not going to do that I’m not even going to risk it. And even parents will call and say my kid’s being bullied but I don’t want to give names because I don’t want to think anything’s going to happen to them. So…yeah

AH: From a counseling perspective, I got an employee who thinks she’s being bullied. And she doesn’t really want me to say anything to the person she thinks is bullying her cause it’s just her word against hers but she says different things that she can hear as she walks by, you nobody else can hear, she says something to her. She feels very uncomfortable with this employee. So, from a counseling perspective, how do you handle when the victim comes in to talk to you that he or she been bullied and they don’t want to tell on the person they just want someone to comfort them I guess or talk to them.

RZ: And sometimes that is all some people want is to be comforted or to kind of hear to have someone listen and hear them and listen and say oh yeah that’s not right or whatever. We try to give people like our students who are victims of bullies, strategies like usually um, a lot of time the bully has a self-confidence issue and that’s why they feel like it needs to demean somebody else. Um, so they kind of act big and bad and tough and they’re not. So, we kind of talk about that like what do you think they’re going through. Would you ignore them? You know, A lot of people are like do really you want to ignore them? Well, if you ignore them and it stops, then that’s a good thing. If you ignore them and it doesn’t, then let’s come up with another strategy. And that sort of thing. So, it’s a really tough, tough situation to deal with because you do not want the kid to get any more retaliation or something worse to happen because they’re kind of helping you. So, you more give em strategies on what can they do when they’re being the victim or how can you let this not bother you. More like kind of rub it off your shoulder and not take it personally. So…

AH: Thank you.

LB: We’ve been talking in class a lot about zero tolerance policies. What is your opinion on zero tolerance policies against bullying.

RZ: Um, I mean I think that in Henrico County we probably have a zero tolerance policy against bullying. I don’t know if I’ve ever I have maybe I have probably a while ago heard it referred to as that. Um, I definitely think I think the hard thing is also the definition of bullying. People get that very confused. I have two nieces that are in sixth grade and everybody’s bullying them. So and so’s bullying, you’re bullying me, you’re bullying me, and that’s not bullying, Emily, just cause someone is teasing with you one time doesn’t mean they’re bullying you, and that sort of thing. So, the definition gets very confusing and I think people over use the word bullying to be very honest with you (laughing). Bullying is a continuous thing. If it happens one time, two times, that’s not bullying. That’s an issue. But that’s not bullying. Um, so I would say truly if you were to really crack down and define what is bullying we probably do have a really zero
tolerance to it, like those situations I don’t see a whole lot of true bullying. Um, now, when it’s happening outside of school on the computer, it gets really tricky for school, because it’s outside of school. But luckily, I mean I haven’t worked much here with. I have a very different population than our regular population here because I’m counselor of the center for humanities students. Um, but at Deep Run, our school resource officer was very involved in those cases. He actually taught stuff on cyber bullying, so he was a great resource. Um, and then when it’s happening outside of school, that’s when it gets really tough because we don’t really have a lot we can do legally or have a foot to stand on unless somehow it’s brought into school.

**TA:** When you say legally makes me think of has there been any litigation against the school system by parents saying you’re not protecting their child.

**RZ:** I’ve never seen, been a part of litigation in that case, I will say I know situations where parents pulling their kids out of school because of bullying, for sure, I mean that happens probably, I mean not, all, but it happens more than people realize, because they’ll home school or put them in a private school um, put em in a smaller school. I’ve seen that definitely. We have had situations where students are granted a variance to attend another school because of a bullying situation that’s just out of control. Definitely coming from middle school, I’ve had these kids can’t be in a class together because of a bullying situation and we always try to take that stuff into account to do. If there’s an ongoing situation, we try to avoid it at all costs. (laugh) So…

**TA:** Did you have anything you want to add today that we didn’t cover?

*Inaudible…*

**RZ:** No, I think I’m good.

**JW:** Thank you very much for your kind attention and information.