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STATE-LEVEL ANTI-BULLYING POLICY: TOWARD A SYSTEM-LEVEL IMPLEMENTATION FRAMEWORK

A Dissertation

Presented in

Fulfillment of the

Requirements for the Degree of

Doctor of Philosophy

BY

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Biography

The author was born in Stamford, Connecticut. He received a Bachelor of Arts degree from Fairfield University in 2000 and a Master of Social Work degree from Fordham University in 2005. In 2013, he completed a Master of Arts in Community Psychology at DePaul University.

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Abstract

Bullying is a public health concern, with negative mental health and academic consequences. In response to the prevalence of bullying in our nation's schools, all 50 states have now enacted anti-bullying legislation. Overall, these mandates include a series of requirements geared toward addressing bullying in school settings and improving overall school climate.

Following this trend of states enacting anti-bullying legislation, the State of Connecticut, the focus of this study, passed PA 11-232, *An Act Concerning the Strengthening of School Bullying Laws* (Conn. Gen. Stat. § 11-232). This legislation was passed in 2011 and brought forth a series of mandates geared toward addressing bullying and improving school climate. These include the requirements that schools must (1) conduct bullying investigations, (2) establish a school climate committee, (3) develop and implement school climate improvement plans, (4) administer school climate surveys to students, staff, and parents, and (5) appoint school personnel who are responsible for implementing these requirements.

Although the enactment of anti-bullying legislation is indeed laudable, there is a significant dearth in the research examining how anti-bullying legislation is implemented. Nevertheless, the scant research examining the implementation of anti-bullying legislation suggests that factors such as funding, training and professional development, and lack of information play a role in the implementation of these requirements. Yet, despite providing some evidence, many of these studies have not consisted of strong methodological designs. Also,

theoretical frameworks have not been used to guide these studies to better understand the processes involved in the implementation process.

The transformative system change framework (Foster-Fishman, Nowell, and Yang, 2007) was used in the current study to better understand how these policies are implemented. Specifically, this framework elucidates how various system-level components, such as norms, resources (e.g., funding), and regulations (e.g., policies), contribute to implementation. This framework also clarifies how various system components inhibit or facilitate implementation processes yielding a comprehensive understanding of how these policies can be effectively implemented. Thus, this investigation examined two overarching questions: (1) What are the system-level factors that challenge or facilitate the implementation of state-level legislative anti-bullying requirements, and (2) How are system-level factors that challenge and facilitate the implementation of state-level legislative anti-bullying requirements inter-connected?

Semi-structured interviews were conducted with 12 district-level school climate coordinators, and 12 school-level school climate specialists. In addition, a state-wide survey was administered yielding qualitative responses from 137 school districts. Two independent coders analyzed these data using the data analysis strategies outlined by Auerbach and Silverstein (2003).

Data analyses revealed a series of factors that served as barriers and facilitators to the implementation of state anti-bullying requirements. Some of the most noteworthy implementation barriers included a lack of resources such as funding and staff, competing policy priorities, and the complex and confusing

way in which these policies are written. Facilitators to implementation included factors such as training and professional development (i.e., human resources) and the interconnections between schools, school districts, and between schools and community based organizations. Finally, this study yields a comprehensive system-level framework that elucidates how respective barriers and facilitators to implementation are interconnected. As states across the nation continue to enact similar legislation, this framework will help to guide the development of state anti-bullying legislation and its implementation.

Introduction

Bullying has become a significant public health concern (Hertz, Donato, & Wright, 2013). The prevalence of bullying among youth has been widely documented (e.g., Centers for Disease Control and Prevention [CDC], 2014; Lessne & Harmalkar, 2013; Wang, Iannotti, & Nansel, 2009), and it is estimated that about 6.8 million students between the ages of 12 and 18 have been victims (Lessne & Harmalkar, 2013). Moreover, bullying is prevalent within school settings, with 27% of students in grades 6 through 10 reporting they have bullied others at school, and 26% reporting they have been victims of bullying during the previous two months (Wang, Iannotti, & Nansel, 2009). Further, 20% of students in grades 9 through 12 report having been bullied on school property (Centers for Disease Control and Prevention, 2014).

Bullying is also associated with mental health risks among victims as well as perpetrators, making its prevalence more concerning (e.g., Kowalski & Limber, 2013). These outcomes include depression (Turner, Exum, Brame, & Holt, 2013; Kowalski & Limber, 2013), anxiety (Carney, Hazler, Oh, Hibel, & Granger, 2010), hopelessness (Siyahhan, Aricak, & Cayirdag-Acar, 2012), low self-esteem (Kowalski & Limber, 2013), antisocial behavior (Ciucci & Baroncelli, 2014), and suicidal ideation and suicide (Cooper, Clements, & Holt, 2012; Turner et al., 2013). Bullying has also been linked to school outcomes including lower grades and standardized test scores (Nakamoto & Schwartz, 2010; Vaillancourt, Brittain, McDougall, & Duku, 2013). The prevalence of bullying and its consequences calls for policy-level responses.

Connecticut's Anti-bullying Legislation

Toward this end, states across the United States have increasingly enacted anti-bullying policies. Following the Columbine High School tragedy, Georgia was the first state to enact anti-bullying legislation in 1999 (Weaver, Brown Weddle, & Aalsma, 2013). Subsequently, between 1999 and 2010 over 120 bills related to bullying were enacted across different state legislatures, and by 2012, 49 states had adopted some form of anti-bullying legislation (Stuart-Cassel, Bell, & Springer, 2011).

Following this nation-wide trend, during the 2011 legislative session the State of Connecticut, the focus of this study, unanimously passed Public Act 11-232, *An Act Concerning the Strengthening of School Bullying Laws* (Conn. Gen. Stat. § 11-232). This amended legislation was supported by 49 co-sponsors, was originally passed in 2002, and amended thereafter in 2006, 2008, and 2011. Connecticut's anti-bullying policy is recognized as one of the most comprehensive nationwide as it addresses both, the prevention and intervention of bullying (Stuart-Cassel et al., 2011). Below, some of the central components of PA 11-232 are described. We distill these components of this legislation into the following sections, (1) definition, (2) personnel (i.e., individuals responsible for implementing legislative requirements), and (3), activities (e.g., tasks that are legislatively required).

Definition. According to PA 11-232, bullying is defined as a repeated, intentional act that causes physical or emotional harm to a student or their property, causes a student to reasonably fear for their safety or the safety of their

property, creates a hostile school environment, violates a student's rights, or that significantly disturbs school operations or the education process (Conn. Gen. Stat. § 11-232). This definition also includes events that occur outside of school (e.g. cyberbullying). However, it is noteworthy that Connecticut's definition of bullying does not mention the existence of a power imbalance between the perpetrator and victim, which is a widely accepted component of the definition of bullying (Limber & Small, 2003).

Personnel. PA 11-232 also appoints specific individuals who are responsible for carrying out legislative requirements. School climate specialists are responsible for implementing state mandates at the school-level (e.g., conducting bullying investigations). School climate coordinators are responsible for implementation at the district-level (e.g., oversee the implementation of safe school climate plans, oversee the work of school climate specialists). Finally, each school is required to have a school climate committee, which is responsible for fostering a safe school climate. Each committee must consist of at least one parent. Although the law does not specify particular staff that should be on the committee beyond the one parent, these committees typically consist of an assortment of administrative staff (e.g., principal, vice principal), teachers, and support staff (e.g., school social worker). The legislation does not allocate funds to individuals serving as a school climate coordinator, school climate specialist, or individuals serving on a school climate committee. Therefore, school staff members typically engage in these responsibilities as part of their school employee role. Parent participation on the committee is also performed on a

voluntary basis.

Activities. Some of the most noteworthy changes within Connecticut's 2011 amended legislation are its reporting requirements. School staff members are required to report witnessed incidents of alleged bullying to school climate specialists orally within one day, and in writing within two days. This then leads to an investigation by the school climate specialist (or the school climate coordinator in some cases). If the incident is substantiated, parents of the targeted child and perpetrator are notified and invited to meet with school officials in order to discuss consequences (e.g., safety, supports, discipline).

Finally, schools are also required to submit a school climate improvement plan to the state department of education once every two years. This plan delineates a range of activities that schools may engage in to address bullying. These include policies and procedures for students and parents to report suspected bullying, development and dissemination of the school's bullying policy to students, parents, and staff, and staff professional development related to bullying. In addition, the school climate improvement plan is to include prevention and intervention strategies. Some of these strategies include evidence-based prevention and intervention strategies, grade-appropriate bullying education and prevention curricula in kindergarten through high school, individual interventions with the targeted (i.e., bullied) child(ren), adult supervision of school areas where bullying is more likely (e.g., hallways), school-wide school climate training, student peer training, promoting parent involvement, school rules prohibiting bullying, harassment and intimidation and establishing appropriate consequences

for those who engage in these acts. It is important to note that the legal language regarding the school climate improvement plans does not specifically require all of these activities, but suggests that schools "may" incorporate these activities into their plan. Therefore, while the spirit of the law is for schools to incorporate a broad range of strategies that address bullying and school climate, in practice, schools can incorporate all or none of these strategies into their school climate improvement plans. Nevertheless, schools typically engage in variety of activities.

Finally, schools must administer school climate surveys to parents, students (grades kindergarten through twelve), and teachers once every two years. Schools could decide to use their own surveys, despite the fact that the Connecticut State Department of Education (CSDE) developed student, staff, and parent surveys for schools to administer. The survey developed by the CSDE is not a validated or standardized survey, but rather, was developed to broadly monitor trends across schools.

Implementation of Anti-bullying Policy

The enactment of state anti-bullying policies marks a positive step forward in the development of broad-scale interventions to mitigate bullying within school settings. However, states are often afforded little direction regarding ways to achieve the objective of reducing bullying (Nickerson et al., 2013). Nevertheless, despite a significant dearth within the research literature, some evidence suggests that anti-bullying policies do not always reach desired outcomes (e.g., decreasing bullying) due to implementation challenges. Overall, the research literature that has examined the implementation of state anti-bullying policies can be

categorized into two broad categories (1) policy scans, and (2) implementation studies.

Policy Scan Studies

Some of the research examining state-level bullying laws have relied on policy scans that examine the particular components of these laws. These studies have primarily documented the contents of state anti-bullying laws. Scanning the content of these laws can elucidate some of the challenges that can later have implications for implementation. For example, by 2003 15 states had enacted anti-bullying laws and Limber and Small (2003) conducted a scan of how bullying was defined across these states. These authors found that six states left the task of defining bullying to state departments of education or to local school districts. In contrast, nine states provided specific details within the legislation regarding behaviors that constitute bullying. Allowing districts or schools to define bullying can lead to inconsistency in how it is defined, and subsequently how bullying is uniformly addressed across districts and schools.

Moreover, among the nine states whose laws did define bullying, Limber and Small (2003) found that inconsistent definitions of bullying were used, and that these definitions were also inconsistent with commonly accepted definitions of bullying within the research literature (Limber and Small, 2003). For instance, there is consensus within the research literature that bullying includes three core components, namely the intention to cause distress or harm, the existence of a power imbalance, and bullying behavior as being repeated (Limber and Small, 2003). Further, these authors found that some states used narrow definitions of

bullying that were limited to “overt acts” (e.g., Colorado), which could exclude covert behaviors such as relational aggression. Consequently, schools can use narrow definitions that do not address the full spectrum of problematic behaviors. Hence, reliance on narrow legal definitions could potentially inhibit schools from fully addressing bullying especially if schools merely adhere to the ‘letter of the law’ and do not move beyond these minimum requirements.

Approximately eight years after Limber and Small’s (2003) study, Strabstein, Berkman, and Pyntikona (2008) also conducted a scan of anti-bullying policies. At that time 35 states had enacted anti-bullying laws. Using a public health framework, Strabstein and colleagues (2008) examined state anti-bullying laws to determine the extent to which public health elements were included into these statutes. Specifically, these authors examined if state laws included a legal articulation of the public health problem and its solutions, and secondly, if the laws create a public health infrastructure to address bullying. In regards to the articulation of the problem and solutions, Strabstein and colleagues (2008) examined if the laws (1) explicitly prohibit bullying, (2) recognize the public health risks linked to bullying, (3) delineate the population to be protected, and (4) specify the need to implement prevention programs or assign penalties (e.g., loss of privileges, school suspension). In reference to the creation of a public health infrastructure to address bullying, this study examined if state policies enabled the implementation of a research-based bullying prevention program.

Similar to prior work conducted by Limber and Small (2003), Strabstein and colleagues (2008) found variation in how states defined the term bullying. For

example, whereas some states defined bullying as including overt behaviors, other states also defined bullying as including a mental state. For example, these states emphasized factors such as intent and motivation. Mental state definitions were also applied to the consequences of bullying, such as inflicting emotional harm and the creation of a hostile work environment. Thus, states can use definitions of bullying that are more subjective, which may be difficult to implement in practice. Beyond definitions, this study found that 24 of 35 states had laws that mentioned the development of bullying prevention programs, but fewer states articulated the specific types of interventions (e.g., character education) to be implemented. An emphasis on interventions marks a positive step within the development of state anti-bullying policies, but failure to specify interventions can leave schools with little direction.

More recently, in 2011 the United States Department of Education commissioned a comprehensive scan of state anti-bullying policies (Stuart-Cassel, et al., 2011). This study examined the extent to which states covered key legislative and policy components related to bullying that were identified by the United States Department of Education. These include (1) purpose, (2) scope, (3) prohibited behavior, (4) enumerated groups, (5) policy review, (6) definitions, (7) reporting, (8) investigations, (9) written records, (10) sanctions, (11) mental health referrals, (12) communications, (13) training/prevention, (14) transparency/monitoring, and (15) legal remedies.

Similar to previous work (e.g., Limber and Small, 2003) Stuart-Cassel and colleagues (2011) study revealed challenges in regards to the definition of

bullying. For example, although 46 states prohibited bullying, three states did not define the specific behaviors being prohibited, which could lead to implementation challenges. One of the major contributions of this study was its focus on state policies that address interventions and issues of capacity (e.g., training). Although 46 states had anti-bullying policies as of this 2011 study, legislative emphasis on interventions that could address bullying lagged behind. For example, only 13 states referred to mental health referrals, and 31 states required an investigation to occur subsequent to a suspected or confirmed event of bullying. Other areas of intervention are more favorable. For example, 39 states at this time required either professional development training or intervention, and 42 states referred to sanctions.

Taken together, policy scans of state anti-bullying laws reveal considerable variation in how bullying is defined, and suggest that some states have narrow definitions of bullying and utilize definitions that are more subjective (e.g., hostile work environment). The variation in how bullying is defined may lead to inconsistency in implementation practices across school settings. In addition, the subjective nature of these definitions may lead to disagreement or confusion when addressing acts of bullying within the school setting. Further, legislative emphasis on interventions that address bullying, though well-intended, are also limited as they are not always clearly specified, defined, or lack an evidence-base.

Collectively, these policy scan studies have provided a comprehensive picture of the evolution of state anti-bullying laws, and how these policies vary across states. These studies also provided a very comprehensive understanding of

policy gaps and strengths that can help to address bullying. In addition, these studies began to elucidate how legal aspects of state anti-bullying laws, such as how bullying is defined, can possibly translate into challenges when schools are tasked with carrying out interventions or sanctions that rely on these definitions. Yet, a research gap remains in understanding how policy components are implemented. For example, although a state's anti-bullying policy may be very comprehensive; this does not guarantee that these policies will be effectively implemented within school settings. Thus, a gap exists between understanding the content of anti-bullying policies, and an understanding of how these requirements are actually translated into practice.

Implementation Studies

Studies examining the implementation of anti-bullying legislation into school settings are scant. In 2003 Australia was one of the first countries to pass national policy related to bullying, the National Safe School Framework (Cross et al., 2011). This national policy included 23 recommended policy and practice strategies that schools could implement to address bullying. Four years after passing this national policy, Cross and colleagues (2011) surveyed 453 Australian teachers across 106 schools. The purpose of this study was to examine schools' implementation of these 23 policy and practice strategies, and teachers were asked to rate how these were implemented in their school. Results revealed that the majority of schools used less than half of these 23 strategies. Thus, although various policies, procedures, and practices were recommended, they were not uniformly implemented. Capacity was also found to be limited as 70% of school

staff reported the need for professional development training in areas related to bullying prevention. In addition, less than 5% of participants reported that their colleagues had sufficient training in working with parents about ways to address bullying. Teachers also reported that addressing covert bullying was a challenge such as identifying students who are covertly bullied (75%), discussing covert bullying with students (78%), and discussing covert bullying with parents (82%). Lack of capacity, in the form of training and skills, was viewed as a barrier to implementation, particularly in relation to covert bullying.

Furthermore, a survey of South Carolina's 2006 Safe School Climate Act, which surveyed 120 teachers and administrators, also revealed challenges to implementation (Terry, 2010). Despite the enactment of this law, 79% of participants indicated that bullying, along with intimidation and harassment, were still problems within school settings. Qualitative responses to this survey revealed several reasons why the legislation was not effectively implemented. Some of these reasons focused on norms. For example, some participants indicated that policy alone is insufficient to change children's normative behavior and that problematic behaviors were often reinforced at home. Issues regarding information and awareness were also raised. For example, the extent to which these policies were publicized across different schools varied, and teachers indicated that parents and students may not have been aware of these policies. Lastly, consistent with Cross and colleagues (2011), some participants reported a lack of staff professional development and education.

Similarly, the state of Washington found that bullying had not been

significantly reduced after passing bullying legislation in 2002, and that school districts did not uniformly implement state anti-bullying policies (Kester & Mann, 2008). In their report, Kester and Mann (2008) indicate that state funding was not provided, which could have enabled schools to engage in activities such as professional development, and the development of school safety plans. Thus, resources such as funding can enable the necessary infrastructure to enhance staff capacity and allow for programmatic activities such as professional development.

More recently, a comprehensive report was developed by EMT Associates (2013), which is the most compressive analysis to examine how state anti-bullying laws have been implemented in school settings. This study included site visits to 11 school districts and 22 middle schools across four states, generating a total of 296 semi-structured interviews.

Findings revealed that school staff reported challenges in differentiating between bullying and other forms of aggressive behavior. This finding resonates with findings in policy scan studies in which states sometimes do not adequately operationalize bullying definitions, or provide definitions that are susceptible to individual interpretation (e.g., Limber and Small, 2003; Stuart-Cassel et al., 2011). The inability to identify bullying behaviors can lead to further challenges if schools are required to follow intervention protocols once bullying is identified. Staff also reported the need for professional development to better understand how to intervene in acts of bullying and prevention strategies. Additionally, staff reported more concrete challenges such as cost and time burden. Despite these challenges to implementation, this study also identified a series of supports that

staff reported as helpful to facilitating the implementation of state anti-bullying requirements. These include strong school leadership, effective communication, collaboration among school and district staff, and information sharing.

Overall, this study helped to advance this scant body of research through the use of qualitative methods (i.e., semi-structured interview), interviewing a large cross-section of stakeholders, and by analyzing implementation practices across states with different anti-bullying laws. In addition, this study provides an important conceptual contribution as it not only examined challenges to implementation, but also examined factors that enabled the implementation of anti-bullying statutes.

Taken together, the studies that have examined the implementation of anti-bullying legislation at the national and state-levels identify common challenges. These include difficulty identifying or differentiating behaviors that constitute as bullying and lack of professional development. These studies also highlight more concrete challenges such as cost and time burden, which are necessary resources that can help to enable the implementation of legislative requirements. Finally, this literature has more recently identified factors that helped to sustain the implementation of anti-bullying requirements in school settings.

Despite providing some understanding, these studies have not been guided by theoretical frameworks that can help to inform a comprehensive and systematic investigation. In addition, these studies identify critical factors to implementation, but they are not presented in an integrated manner that elucidates how they are interrelated. As states continue to enact similar legislation,

theoretical frameworks are needed to help facilitate and arrive at comprehensive models that guide implementation processes.

Theoretical Framework

Overall, anti-bullying policies seeking to mitigate the prevalence of bullying in school settings represent a system-level change effort. According to Foster-Fishman, Nowell, and Yang (2007) systems change refers to an "intentional process designed to alter the status quo by shifting and realigning the form and function of a targeted system (p. 197)." Indeed, state policies such as Connecticut's anti-bullying legislation (PA 11-232) seek to shift systemic components by assigning specific roles (e.g., school climate coordinators, committees), relationships (e.g., parents being required to be on school climate committees), and practices (e.g., bullying investigations, school climate improvement) within the school milieu. Considering that anti-bullying policies represent a broad-scale systemic change effort, the transformative systems change framework (Foster-Fishman et al., 2007) can help to shed light on the structures and processes that influence the implementation of these policies.

Transformative Systems Change Framework

Drawing from systems theory, the transformative systems change framework can facilitate a better understanding of how state anti-bullying requirements are implemented within schools (Foster-Fishman et al., 2007). The transformative systems change framework consists of four major components (1) bounding the system, (2) system parts, (3) system interactions, and (4) identifying levers for change. Understanding these respective system components can enable a better

understanding of the processes involved in the change process.

Bounding the system. Bounding the system refers to describing the system. That is, (1) defining the problem that is to be addressed (i.e., implementation of anti-bullying legislative requirements), and (2) describing who or what is contained within the system. Defining the problem (e.g., barriers to implementation) can be a complex process as problem identification often varies across constituencies and is subject to individual interpretations. Therefore, it is important to engage multiple stakeholders (e.g., school personnel, school climate coordinators) who can articulate varying perspectives. Further, defining the system, involves understanding individuals, groups, organizations, or other stakeholders that are contained within the system. Identifying these stakeholders has been regarded as critical within system interventions (e.g., Churchman, 1970). When defining the system, special attention should not only be afforded to stakeholders or groups that are contained within the system (e.g., teachers, principals), but also understanding which groups are marginalized or considered to be outside the system (Foster-Fishman et al., 2007). Attention to these dynamics can elucidate how power is distributed.

System parts. System parts includes four respective dimensions, namely (1) system norms, (2) system resources, (3) system regulations, and (4) system operations. Identifying *system norms* can elucidate how the system is perceived and how problems are understood in multiple contexts. These norms often include values, expectations, and tacit assumptions, and some suggest that system-change can only truly occur once norms are addressed (Gersick, 1991; Schein, 1990). In

regards to anti-bullying policy, system-level change would be more likely to occur when school norms align with the goals of anti-bullying policies. However, attending to normative dimensions may be necessary but insufficient in facilitating system change. Tangible factors must also be considered.

Attending to *system resources* focuses our attention on more tangible factors and include (1) human resources, (2) economics, and (3) social resources. Human resources include factors such as skills, competencies, and knowledge, suggesting that system change requires a specific skill set. This resonates with previous work examining the implementation of anti-bullying laws in which participants identified the need for professional development (Cross et al., 2011). Thus, school professionals with certain skills (e.g., social workers, school psychologists) may be more effective in implementing specific aspects of anti-bullying requirements (e.g., student interventions). Moreover, economics refers to more tangible resources such as funding and programmatic resources that serve as necessary inputs enabling programmatic activities (e.g., anti-bullying interventions, training) geared toward reducing bullying. Finally, social resources refer to social relationships between members within the system. Understanding these relationships can shed light on the movement of information between various members within the broader system. For example, implementation of state anti-bullying requirements may be easier for schools that communicate with other schools in the district, and are consequently more informed and able to learn best practices.

Further, *system regulations* includes policies and procedures as well as

routines. Policies and procedures help to institutionalize change and guide behavior. These regulations can help to clarify expectations as well as sanctions if polices are not honored. However, policies do not specifically delineate behaviors (Foster-Fishman et al., 2007). Rather, routines are what guide and maintain behaviors (Foster-Fishman et al., 2007; Olson & Eoyang, 2001). Therefore, although anti-bullying polices can institutionalize behaviors, it is necessary for the actual behaviors to be routinized and integrated into school practices.

Finally, *system operations* examines power and decision-making processes. For example, specific individuals or entities within a system may assert more power than others. Understanding the landscape of power dynamics can inform system change processes by identifying individuals or entities that can be leveraged to spearhead change. An assessment of power and decision-making can shed light on whether implementation processes are top-down or bottom-up. From this standpoint, system operations can elucidate who or what entities (e.g., principals, school departments) play central roles in ensuring that state anti-bullying requirements are implemented.

Taken together, system parts inform an understanding of the structural elements within a target system. An understanding of these various structures can guide policymakers and other stakeholders (e.g., school personnel) about the essential components (e.g., norms, resources, policies) that need to be targeted to successfully implement state anti-bullying requirements. However, a focus on system parts does not specify *how* these respective components are interrelated.

System interactions. System interactions is the last critical component of the

transformative system change framework. System interactions elucidate how respective structures in a system interact, are connected, and consequently, how these interactions either obstruct or facilitate change. Components within a system are either directly or indirectly connected and understanding these 'interdependencies' and patterns of systemic behavior can reveal how information is distributed, how the system self-regulates, and system components that inhibit or enhance the performance of other system components (Foster-Fishman et al., 2007). For example, recent work has shown that in the context of funding limitations, schools have collaborated by sharing costs, to enable school-wide bullying awareness assemblies to take place (EMT Associates, 2013). Through collaboration, schools are able to garner resources to bring about a specific goal. In some instances, system interactions can involve connections between different school stakeholders. For example, schools can communicate about issues regarding bullying with parents in the school community using mechanisms such as newsletters and parent workshops (EMT Associates, 2013). Through this process, parents are able to learn more about school efforts, and similarly, schools are able to gain information regarding parent perspectives. However, these exchanges would not be possible if these system interactions did not occur. Taken together, the transformative systems change framework can guide a better understanding of key system parts, and how these system parts are inter-connected.

Rationale

Bullying is prevalent throughout schools across the United States. Warranted

are broad-scale policy-level interventions that can influence school practices in order to mitigate bullying and improve the social climate of school settings. The development of state policies to mitigate bullying and its consequences represent such a response. However, little is known about the processes that contribute to the effective implementation of state-level anti-bullying policies. Theoretical frameworks can enable a comprehensive understanding of these processes.

Using transformative system change framework, this study examined the implementation of anti-bullying legislation following the enactment of new anti-bullying mandates in 2011, in the State of Connecticut, The perceptions of school climate coordinators and specialists were examined, 24 of whom participated in semi-structured individual interviews, and 656 who provided qualitative feedback in a state-wide administrative survey. More specifically, this study investigated factors that challenged and enabled the implementation of specific legislative requirements, namely, (1) conducting bullying investigations (2) the establishment of school climate committees, (3) the implementation of school climate improvement plans, and (4) the administration of school climate surveys. Within the scant research literature that examines state anti-bullying policy, this study contributes to this area of research in the following ways.

First, this study provides a comprehensive understanding of the factors that challenge the implementation of state anti-bullying legislation, as well as factors that enable implementation. Studies have mainly focused on implementation challenges and have not examined facilitators to implementation (e.g., Cross et al., 2011). To a degree, identifying barriers allows one to infer factors that enable

implementation because challenges often reflect the absence of a necessary feature that can promote implementation. For example, Cross and associates (2011) identify lack of training as an implementation barrier, and one can infer that, conversely, the presence of training would facilitate implementation. Nevertheless, specifically asking study participants about perceived challenges and facilitators to these challenges allows for a better understanding of how strategies are specific to certain challenges, and how individuals are intentional in circumventing challenges.

Second, I used a theoretical framework to guide this study, whereas previous studies did not systematically organize the examination of implementation processes according to a broader theoretical model. Organizing implementation processes into a broader theoretical framework can signify an important first step for this body of work. For example, theoretical frameworks can set the stage for inferential studies that test the link between system-change factors, fidelity, and school outcomes (e.g., reductions in bullying and school violence). In regards to theory development, the transformative system change framework accounts for a wide-range of system-related concepts including tangible (e.g., resources) and intangible constructs (e.g., norms). This framework can also foster a more dynamic understanding of how components within a system are interrelated and how they interact. System-level change is a multi-faceted, dynamic, and problematic process, and understanding these linkages can elucidate how system components may be interconnected, clustered, or nested (Peirson, Boydell, Fergus, & Ferris, 2011). Understanding these linkages can also reveal how factors

that facilitate implementation are direct responses to these challenges.

Third, this study employed a qualitative design. Previous studies of anti-bullying legislation have primarily relied on quantitative methods using primarily descriptive statistics. Although some studies have integrated in-depth qualitative methodologies (EMT Associates, 2013), theoretical constructs were not developed. In addition, some of these studies were limited to open-ended responses on surveys (Cross et al., 2011), and did not engage participants in more in-depth interviews. Engaging participants in more in-depth interviews can allow for a richer understanding of the processes underlying implementation.

Finally, data for this study were collected immediately following the first year in which school districts and schools were required to implement these legislative requirements. Understanding implementation processes during this early "critical period" can elucidate how implementation processes set the trajectory for 'succession' or how social systems evolve over time (Trickett, Kelly, & Todd, 1972).

Research Questions

I. Using a transformative system-change framework, what are the system parts (i.e., system norms, system resources, system regulations, system operations) that challenge or facilitate the implementation of state-level anti-bullying requirements?

II. Using a transformative system-change framework, how are system-level parts that challenge and facilitate the implementation of state-level

legislative anti-bullying requirements inter-connected (i.e., system dynamics)?

Method

This study used primary and archival data that were collected as part of an evaluation that examined the implementation of Connecticut's anti-bullying legislation (PA 11-232). This study was reviewed and approved by DePaul University's Institutional Review Board.

Semi-structured Interviews

Participants. There were 24 participants in the semi-structured interviews. Convenience sampling was used to select participants. The Connecticut State Department of Education (CSDE) sent an initial electronic communication to 793 school climate coordinators and specialists throughout the state, which described the study and its purpose. The e-mail indicated that individuals interested in the study should contact me directly, or contact CSDE who would then forward their contact information to me. In order to participate, the individual had to either be a school climate coordinator or school climate specialist. Twenty-seven prospective participants expressed interest in the study. I scheduled a date and time to speak by phone with individuals interested in participating in order to explain the details of the study. During this initial telephone meeting, the study was explained and the consent form was reviewed. The prospective participants were then asked to review the consent form again after this initial meeting. Finally, the potential participants either faxed or e-mailed their completed consent form to the research team if they wished to

participate. They were also informed that, if they have further questions, to contact me. One individual declined to participate after consulting with me, and two individuals were ineligible to participate. Thus, there were 24 total participants.

Participants were 12 school climate coordinators and 12 school climate specialists. The majority of participants were female (71%; *n* = 17) and approximately half worked in suburban school districts (54%; *n* = 13), followed by urban districts (42%; *n* = 10). Due to the limited number of urban communities in the state, urban districts were over sampled. The majority of participants were White (83%; *n* = 20), followed by Latino (13%; *n* = 3), and Black/African American (4%; *n* = 1). Most participants worked in traditional public schools (79%; *n* = 19) with a smaller percent working in public charter or public magnet schools/districts (21%; *n* = 5).

Procedures. A semi-structured audio-recorded telephone interview was conducted at a date and time convenient for each respective participant. Two trained graduate research assistants and I conducted the interviews between Spring and Fall of 2013. The interviews ranged from 30 to 60 minutes, with most interviews lasting about 40 minutes. Participants were mailed a yearly calendar diary valued at approximately $20 for their participation.

Measure. The interview protocol was comprised of 13 questions that were divided into six sections (see Appendix A). These questions were designed to collect information about factors that served as challenges and facilitators to the implementation of PA 11-232 requirements. In the first section of the interview,

participants were asked to comment broadly on their experience during the past school year with the new PA 11-232 requirements. Participants were then asked to discuss their experiences with specific aspects of the legislation, including the investigation of bullying incidents, having a school climate committee, the implementation of their school climate improvement plan and improving school climate, and administering school climate surveys. The interviewers asked participants about challenges to implementation as well as factors that were viewed as helpful in addressing these challenges. Finally, the interviewers asked follow-up probing questions in each section of the interview, when necessary.

Data analysis. Each semi-structured interview was transcribed verbatim and then reviewed by two independent coders (myself and one undergraduate student) in order to identify themes. Data analysis took place in two major stages. First, the transcripts were reviewed and coded according to coding procedures outlined by Auerbach and Silverstein (2003). We read each transcript and identified repeating words and phrases and then organized these into themes. The other coder and I first reviewed three transcripts. We independently developed possible themes, and then discussed these themes during a scheduled meeting in which we formally developed themes by consensus. However, it is important to note that prior to this formal review process, the undergraduate student and I were already aware of many themes because the student had transcribed the audio-recordings of the interviews, and I conducted the interviews. During the data collection and transcription process, the research assistant and I discussed repeating ideas and themes.

After the third transcript, we felt confident about the themes and continued to independently review additional transcripts and convened to discuss how we coded specific aspects of each transcript. For example, when reviewing the transcript together we specifically discussed the theme that was identified and the corresponding lines in the transcript reflecting the theme (e.g., “I coded lines 22-35 as norms”). Once we both identified and agreed upon the theme, we created a master document with specific headings that reflected the respective themes, followed by quotes reflecting the particular theme. For example, the theme “norms” was accompanied by quotes that reflected this theme.

It is important to note that we initially used an inductive approach to code the interview data (Auerbach & Silverstein, 2003). Therefore, we did *not* immediately code the data into the constructs within the transformative system-change framework (Foster-Fishman et al., 2007). However, upon a closer review, the themes that were originally generated aligned strongly with the transformative system-change framework. For example, when initially coding the data we developed a theme called “capacity,” which included responses about training and professional development. This is referred to as human resources within the transformative system change framework. Similarly, the themes “legislation/policy” and “resources” corresponded with the transformative system change framework categories of “system regulations” and “economics”, respectively. Thus, during the second stage of data analyses, we modified our themes to reflect the transformative system change framework labels, as the

categories we generated were closely aligned with the transformative system change framework categories.

State-wide Survey

Participants. In addition to the semi-structured interviews, a state-wide administrative survey was sent to all 169 school districts in Connecticut. This survey was distributed for administrative purposes by the Connecticut State Department of Education to assess schools' compliance with PA 11-232 requirements. The survey was originally sent to each school district's superintendent by electronic mail (i.e., e-mail). The e-mail described the purpose of the survey, included instructions, and an electronic link to the survey. This e-mail instructed superintendents to forward the communication to the school climate specialists at each school within the district so that the survey could be completed. Survey responses were received by 81% of school districts across the state (n = 137). The majority of these school districts were suburban school districts (82%; n = 112) followed by urban/small urban (18%).

Procedures. School climate specialists completed the electronic survey that was distributed by the Connecticut State Department of Education. Schools were legally required to complete this survey in accordance with PA 11-232 so that CSDE could ascertain compliance. Because completion of the survey was a legal requirement, it was not anonymous and there was no incentive for completing the survey. This information was also publically available upon request to the Connecticut State Department of Education. Overall, this survey was not designed to collect individual-level information, but rather, school-level

information regarding how respective schools implemented legislative requirements in accordance with PA 11-232. The survey lasted about 30 minutes to complete once schools had the necessary information to complete the survey. Once the survey was completed, the data populated into a CSDE database, which was managed by the information technology department.

Measures. This survey consisted of a total of 23 questions, many of which included sub-questions (see Appendix B). The survey was designed to assess how schools complied with PA 11-232 requirements. This administrative survey also included a series of open-ended questions designed to assess schools' experiences with PA 11-232 requirements such as challenges, and ways that CSDE could provide more support. For the purposes of this study, responses to the following three open-ended questions were examined: 1) "Briefly, describe any existing or anticipated barriers that you think would inhibit the implementation of School Climate Improvement at your school", 2) "How can the CSDE support you in your school climate improvement efforts?," 3) "Please tell us about any challenges that were experienced at your school in regards to the school climate assessment instrument ", and 4) "Do you have any recommendations for the CSDE?".

Data Analysis. The open-ended responses of the state-wide survey were analyzed using NVivo 10. During the first stage, the data were coded into the transformative system-change framework (Foster-Fishman et al., 2007), which involved coding the responses according to the different framework parts (e.g., system regulations, economics, system norms, social resources; see Table 1). To

begin, the undergraduate coder and I engaged in a series of trials in which we coded participant responses with the goal of achieving almost perfect interrater reliability agreement (i.e., κ = .80; Viera & Garrett, 2005). At first, each trial consisted of coding 50 items, and after each trial we examined inter-coder reliability. Once we reached interrater reliability of .80 or above, we continued to independently code participant responses. Interrater reliability was almost perfect once the entire coding process was complete *(*κ = 86; Viera & Garrett, 2005). Three additional system-level categories (i.e., system size, system transitions, system practices) were developed that are not part of the original framework outlined by Foster-Fishman and colleagues (2007; see Table 1 for list of categories and corresponding sub-categories).

After qualitative responses were coded into the respective system parts, we then developed subcategories across four of the eight major categories. During this second phase of coding we again used the steps outlined by Auerbach and Silverstein (2003), which involves identifying repeating words, phrases, and organizing these into larger themes. For example, there were different challenges that were expressed that were related to system regulations. Therefore, I closely examined these different responses and arranged the responses into different sub-categories (i.e., simplifying policies, competing policies, lack legislated practices, unfunded mandate, top-town policies). Corresponding definitions were developed for each sub-category. Once the definitions were established, 30% of the responses within the system part category (i.e., system regulations) were randomly selected to be independently coded by the undergraduate assistant and I.

I independently continued to code the remaining items once we reached interrater reliability of above .80. Interrater reliability across all of sub-categories ranged from .89 to 1.0.

Evaluation of Research Findings

Validity. Credibility of research findings and interpretations is a criterion used to evaluate the quality of a qualitative study (Lincoln & Guba, 1986). Credibility of findings refers to whether the findings are reflective of participants' experiences. I enhanced the credibility of our findings by using member checking and triangulation (Lincoln & Guba, 1986). Member checking involves sharing findings with participants after data collection and analysis to ensure participants' perspectives were appropriately captured. In this study, member checking was performed among a total of 13 individuals and was conducted in several ways. First, findings were shared with 4 (17%) participants who participated in the semi-structured interviews. This involved a combination of strategies, such as obtaining verbal or written feedback from participants in regards to themes that were generated, as well as sharing excerpts of what was said by participants to ensure accuracy. For example, when presenting the theme, simplifying policies, I shared that people were experiencing a difficult time understanding the law, especially understanding the word "bullying." I then proceeded to ask if this was consistent with their experiences, and if they could elaborate.

Second, member checking was performed with seven individuals outside of the study, but who were also responsible for implementation of these mandates. Themes were presented within a focus group consisting of six school climate

specialists (five school principals and one curriculum specialist), and one school climate coordinator (a district-wide school superintendent). After presenting each theme, the focus group was asked to debrief and share their experiences and discuss whether the theme reflected their experience.

Overall, the themes that were presented were very consistent with their experiences in implementing the state's anti-bullying legislation. Participants were also specifically asked if any of the information presented did not reflect their experiences. There were no instances in which members of the focus group disagreed or felt that the information did not reflect their experiences. In general, members of the focus group tended to elaborate and share personal accounts that reflected the theme, and these anecdotes provided me with more confidence regarding the validity of the themes. However, it is worth mentioning that there were several themes for which the focus group provided more feedback and elaboration because these themes were of high concern and strongly reflected their experiences. These included complex and confusing polies, competing policies, unfunded mandate, lack of commitment and engagement, normative use of the word bullying, and lack of funding, staff, and time. The focus group also expressed the importance of training and professional development and school leadership.

Third, member checking was conducted by consistently sharing themes with two state-level staff members who were responsible for overseeing this state-wide initiative. This occurred more informally within meetings, telephone conversations, or by e-mail. These staff members were typically well aware of the

themes that I presented to them (e.g., parents' use of the word bullying, lack of funding), and in many instances they were able to offer additional insight on how the state was responding to these challenges.

Finally, triangulation in this study involved cross-checking data with different sources and methods (Lincoln & Guba, 1986). Theoretical constructs generated from the 24 semi-structured interviews were compared to those generated from the state-wide administrative survey. Overall, the majority of themes that were generated were yielded across both data collection methodologies (77%). Of the seven categories that did not overlap, four categories were specific to the semi-structured interviews, and another three categories were generated only from the state-wide survey (see Table 1). Taken together, the use of member checking and the use of triangulation provides strong support in regards to the validity of the study findings.

Table 1
System-level categories, sub-themes, and corresponding source

Category	Source
System Regulations	Both
Complex & confusing policies	Both
Unfunded mandate	Both
Lack of legislated practices	SWS
Competing policies and priorities	Both
Top-down policies	SWS
System Structures*	SWS
No sub-category	-
System Transitions*	Both
No sub-category	-
Economics	Both
Lack of funding	Both
Lack of staff	Both
Lack of time	Both
Lack of materials	Both
Norms	Both
Lack of commitment & engagement	Both
Normative use of the word bullying	Both
Conflicting external norms	SSI
Human Resources	Both
Professional development & training	Both
Guidance & information	Both
Social Resources	Both
State-School interdependence	Both
Inter- and intra-district interdependence	Both
School-parent interdependence	Both
School-community interdependence	Both
System-Practices*	Both
School interventions	Both
Pre-existing infrastructure	SSI
System Operations	SSI
Leadership	SSI

Note: System-level parts appear in bold and subcategories appear indented below. SSI = Semi-structured interview; SWS = State-wide survey.
* = System part is new and does not appear in Foster-Fishman et al., 2007.

Results

Overview

Using transformative system change and social-ecological frameworks, this study examines the implementation of anti-bullying legislation following the enactment of new anti-bullying mandates in the State of Connecticut in 2011. More, specifically this study examines the 1) system-level parts that play a role in implementation processes, and 2) how these system parts are interconnected.

System-level parts that serve as barriers or facilitators to the implementation of state-level anti-bullying requirements.

For purposes of this study, themes generated from both the semi-structured interviews and the state-wide survey are integrated and presented in this section. Although the system parts brought forth by the transformative system change framework (Foster-Fishman, et al., 2007) were used as a guide, this study yielded three new system-level parts (i.e., System Transitions, System Structures and System Practices; see Table 1) that also played a role in the implementation of state anti-bullying and school climate improvement polices. Sub-categories were further generated across seven of the system parts categories yielding a total of twenty-one implementation-related subcategories (see Table 1). Overall, the identification of these system parts and their corresponding sub-categories brings forth a comprehensive understanding of the system-level components involved in the implementation of state anti-bullying legislation. In the following sections the system-level part is presented first, followed by its corresponding sub-categories.

Barriers to Implementation

System regulations. System regulations is the first system-level part and refers to policies and procedures (Foster-Fishman et al., 2007) within and outside the school setting. Policies include laws, codified standards, legislation, and legal definitions. Policies also include state-level initiatives, (e.g., the new state teacher evaluations), because these initiatives are the direct result of policy directives. Procedures refer to codified methods or protocols that inform or guide the implementation of anti-bullying efforts. Procedures usually occur within district or school settings and include things such as manuals, written communications, checklists, timelines, and rubrics – all of which were purposefully developed to guide implementation practices. Overall, any reference to a policy or a procedure was coded into the broader system-level category of system regulations. The system regulations category was further coded into five sub-categories 1) complex and confusing policies and procedures, 2) unfunded mandate, 3) lack of legislated practices and interventions, 4)competing policies, and 5) top-down polices.

Complex and confusing policies and procedures. Complex and confusing policies and procedures was a common theme under system regulations. Overall, participants referred to the complexity and lack of clarity of the new legislation. Participants also referred to the need to reduce paperwork, have fewer regulations, streamline policies, and have greater uniformity. The bullying investigations raised many concerns. PA 11-232 calls for school climate specialists to investigate suspected acts of bullying when these events are reported. However, this process entails a complex series of steps such as interviewing witnesses, notifying parents

of both victims and perpetrators, developing reports, developing interventions, and then repeating some of these steps once the incident is substantiated. Thus, the requirements dictating these actions were viewed as being confusing, involving too much legalese, and as being cumbersome.

This was further complicated by the ambiguous and confusing nature of the word 'bullying.' The definition of bullying was viewed as replete with legal jargon that was confusing to school staff. Some participants referred to the need for a "simpler", "narrower", "student-friendly", and more "concrete" definition of bullying. The definition of bullying was often viewed as ambiguous, and it was not clear how the definition should be applied in practice. For example, state law defined bullying as being of a repeated nature, but the level of nuance to which school climate specialists and coordinators should focus on repetitious student behaviors was not always clear. For example, a participant illustrated this challenge as follows.

> Yeah, yeah, you know they [schools] are concerned. Should they be looking into every last little thing that, that comes their way? You know, … two kids name-calling on the playground- is that something they should be thoroughly and completely investigating, now if it's happened twice? Or, you know, what kind of [behavior] rises to the level of having to be investigated…?

Taken together, the law was viewed as complex and confusing due to the myriad of legal requirements and protocols. These requirements were further complicated by the ambiguous way that bullying was defined within the law.

In response, some participants discussed the development of protocols and procedures that simplified the legislation. These protocols and procedures were facilitators to implementation because they were effective in simplifying the

legislation and removing ambiguity. For example, participants reported the creation of manuals, checklists, flow charts, and standardized forms that translated confusing legislative components into materials that were easier to understand and could guide school practice. These simplified documents were typically developed at the school-level, delineated how bullying investigations should be conducted, and simplified the word 'bullying'. One school climate coordinator created templates and checklists to guide her staff when conducting bullying investigations as follows.

> We've also streamlined our paperwork quite a bit, where I've given the specialists examples of what an action plan might look like for a student who has exhibited a bullying behavior or has been a victim of bullying. We have checklists for [bullying investigation] interventions, so when they [school climate specialists] do an investigation they have that checklist.

Another participant developed a checklist containing the definitional components of bullying as defined by state law. This checklist helped school climate specialists determine if specific behaviors should be considered bullying. For example, one participant stated the following.

> …they had to create a template that really got at what constitutes bullying or not … so that when they [school climate specialists] were to receive a bullying allegation and then conducted the investigation, they [school climate specialists] would look at this checklist to determine whether or not it is bullying.

Thus, distilling and simplifying the legal components of the law reduced ambiguity and facilitated school decision-making when conducting bullying investigations.

Unfunded mandate. Unfunded mandate was another system regulation barrier, which also reflected problems inherent to the legislation. In this case, the barrier was the result of an omission as funds were not legislatively appropriated

within the PA 11-232 statues. Participants indicated that PA 11-232 was an unfunded mandate and that schools were not provided the necessary monetary resources to implement key aspects of this work (e.g., trainings, school interventions, hiring staff). One school climate coordinator discussed his frustration with the costs that were incurred by schools.

> Before new legislation is passed, the State needs to spend more time considering the costs that will be incurred to local school districts. Much of the new legislation that has passed in recent years (School Climate, SSP, Teacher Evaluation, Truancy, etc.) has been unfunded by the State.

Similarly, another participant stated the following.

> If the state is going to mandate things, they need to provide support, which means funding for state school climate specialists or coordinators in each school. I absolutely believe that. I think that Connecticut in particular has offered a lot of state mandates lately that are totally unsupported or aren't funded.

Thus, PA 11-232 was an unfunded mandate, and the lack of funds appropriated to support this initiative was viewed as a barrier.

Lack of legislated practices and interventions. Another barrier within system regulations was the lack of legislated interventions and practices. This was viewed as another shortcoming of PA 11-232 as the law was not explicit in telling schools the specific interventions that should be put into place to address bullying and improve school climate. Thus, participants expressed the need for the law to concretely delineate these interventions and practices. For example, a school climate specialist stated that, "the state legislature needs to ensure that best practices for handling bullying and mean spirited behavior become part of bullying laws."

Competing policies. The previously discussed sub-categories under system

regulations all reflected perceived barriers within the law itself. However, competing policies was related to *other* state and federal laws or initiatives. For example, participants indicated that they often had to attend to other state and federal requirements, which interfered with their ability focus on PA 11-232's requirements. Some of these initiatives included the common core and a teacher evaluation system that was being phased into the school systems. In general, these initiatives interfered with anti-bullying and school climate improvement efforts as they drew away time, staff, and other valuable resources that were needed to effectively implement these requirements. For example, one participant stated "a barrier to the implementation of our school climate improvement is time to provide training due to the number of statewide initiatives that are mandated for next school year." Similarly, a school climate coordinator stated the following.

> There's a lot of focus on increasing student achievement. There's also in the state of Connecticut a lot of focus right now on changing teacher evaluation and those priorities are hard to support at the same time as we're also supporting a kinder, gentler school. You know it's hard to keep all those balls in the air at once. So that's been a challenge too … And so many initiatives at once has been a challenge.

In addition, federal privacy laws, such as the Family Educational Rights and Privacy Act (FERPA) presented challenges within the context of school climate committees, and the specific requirement of having a parent representative on the school climate committee. According to PA 11-232, schools are required to have a school climate committee that consists of at least one parent. However, schools were often challenged when discussing confidential student cases due to the presence of a parent on the committee. A school climate coordinator described this challenge as follows.

> I think one of the other challenges has been to be truly inclusive of parents - to really embrace the opportunity for parents to be part of [the committee] and not just give it a superficial essence that you know they have to be here... It does become a little bit tricky… Often we are talking about specific student cases … 'Well, when you are going to talk about specific student cases then the parent would leave [due to federal privacy laws]

Another school climate coordinator echoed this same notion as follows.

> And another thing that parents didn't understand is, 'Well we want to be part of the investigation if we're going to be on the committee.' But then we come into privacy laws and we remove them, so … it felt like they were there almost as a courtesy or maybe just a voice as opposed to actually being on the team.

Thus, school climate coordinators and specialists attended to other state and federal policies that also required time, staff, and other resources. In addition, FERPA laws limited the extent to which parents could be engaged in school climate committees. In turn, these requirements and initiatives limited the ability to focus on bullying and school climate improvement.

Top-down policies. A final system regulation barrier is top-down policies. Some participants indicated that policy makers developed PA11-232 without consulting school districts and other stakeholders. In turn, participants indicated the need for "bottom-up policies" or legislation that is developed by soliciting the input of schools. For example, participants indicated that the state should "consult with school district practitioners when developing policies or new laws" and that "educators should be consulted and involved in [developing the] new mandates to ensure they are appropriate and manageable." Overall, school stakeholders could inform the design of state anti-bullying policies in a manner that is conducive to implementation within school settings.

System Structures and Transitions

System structures and transitions. System structures and transitions, is a second system-level part that emerged as an implementation barrier, and is not part of the transformative system-level change framework (Foster-Fishman et al., 2007). Originally, these were two separate categories, but were later collapsed. System structures emerged as an implementation barrier that refers to physical or organizational factors within or outside of the school setting that affect the implementation of anti-bullying policies. System structures acknowledges the unique structural characteristics of the school and district context. These structural features (e.g., school size, school schedule) set parameters on how policy requirements can be implemented. Overall, the majority of these responses referred to school size. For example, one participant stated that "Tier 3 interventions for behavior will be difficult to implement with the necessary frequency due to a large school enrollment." Another participant indicated that "Being a small school, we have several part-time staff members. It is difficult to keep everyone on the same page and to attend the same training." Thus, there was not necessarily an advantage expressed between larger and smaller schools and districts. Rather, different school sizes brought forth their own unique limitations to implementation. References were also generated in regards to the school community setting (e.g., schools within high poverty districts) and the school schedule, but these references were less common.

System transitions refer to shifts or changes within or outside of the school setting, or circumstances that affect the continuity of school processes. As a result,

transitions affect implementation efforts. Responses within this category were varied and included references to student transience, transitioning into a new school facility, staff turnover, student absences, school closings (e.g., due to inclement weather), and school vacations. One school climate coordinator who was interviewed discussed the following.

> Probably one of the most difficult aspects [of conducting bullying investigations] is that there are multiple students involved and there are illnesses and school closings, you know this winter was horrific for any sort of continuity in terms of the school day and trying to get any sort of consistency. So, you know, those are factors that are out of our control… and if you've got one more student that you need to try to interview [in a bullying investigation] and the student is out sick, you know, life can sometimes get in the way outside of our best intentions.

Economics

Economics refers to resources and inputs that enable a wide-range of activities (e.g., anti-bullying interventions, school-wide assemblies, hiring staff, professional development trainings) geared toward reducing bullying and improving school climate. There were four sub-categories in this system part: a) funding, b) staff, c) time, and d) materials. Each of these sub-categories were discussed as barriers given that they were typically discussed within the context of being absent or lacking.

Lack of funding. Participants discussed challenges related to the lack of funding. Funding was viewed as necessary to implement activities or interventions, such as trainings, school-wide anti-bullying events, school-wide surveys, or school-based interventions. Participants generated references to "more funding", "need for more funding", "funding for programs", "we need funding to conduct trainings", "the state should consider the cost", "[the state CALI]

trainings should be free", "our budget is a barrier", "we need financial support" and "lack of resources and a very tight budget may inhibit the implementation of our school climate improvements." In some instances, comments regarding funding were targeted to specific school-based interventions that would support school climate improvement. For example, participants mentioned "[we need] financial support for an elementary-level adult-student mentorship program". Another participant mentioned the need for "funding to support [the] Positive Behavioral Interventions and Supports program (PBIS)".

Lack of staff. Participants discussed the need for personnel who could assist with the development of school and district capacity and implementation. The need for personnel was often in relation to conducting bullying trainings or to implement school-based interventions. For example, a sampling of participant references include "we need more staff", "need more mental health professionals who could work with students", "[need] experts on bullying prevention", "need consultants", "trainers", "speakers", "need state personnel who could facilitate training".

Lack of time. Lack of time emerged as a third sub-category, which referred to the limited time that schools have to implement the legislative requirements. Some of the references generated include "we need more time", "our greatest barrier is time", and "[the state needs to] make reporting less time consuming". It is important to note that in some instances this sub-category overlapped with "competing policies and priorities" (discussed earlier) in which schools attended

to a variety of state and federal requirements and, as a result, had less time to focus on one priority. For example, one participant stated the following.

> …the state and the federal government just continue to give us more and more responsibilities as administrators and I think they really need to look at the amount of time that one person has in a day, and really take that into consideration…all of these things take me away from being the instructional leader that I need to be. And that does bother me; I feel like I can't do everything well.

Similarly, another participant discussed how the upcoming state-wide teacher evaluations would require significant attention and time and would interfere with implementing some of the anti-bullying and school climate improvement requirements.

> The new teacher evaluation system is a barrier, as it will take up a considerable amount of time for administration, which will make us less able to be involved in some of the social-emotional things we have been [involved with] in the past…

Moreover, participants also referred to the lack of time needed to carry out specific aspects of the legislative requirements, such as conducing bullying investigations, conducting school-wide surveys, and finding the appropriate time in which staff and parents could be available to participate on the school climate committee. One school climate specialist discussed the laborious nature of conducting bullying investigations as follows.

> Just the time-consuming nature of it [the bullying investigations], interviewing five students separately, speaking with the parent that had made accusations, and speaking with the students. It was six [students in this incident] plus a sibling witness, plus the parent - you're talking to eight different people. Usually, even if it's 15-20 minutes [to talk to each person], plus the writing, it really takes up the day for one incident…

Lack of materials. The sub-category lack of materials included references to tangible non-monetary materials that could help schools in their efforts to

address bullying and school climate. This included references to “curricula”, “anti-bullying curricula”, “technology”, “cameras to monitor student behavior”, “software that could serve as a database for recording student behavioral incidents and office referrals”, and “a new PA [public announcement] system would provide better communication to ensure safety”.

System Norms

Until this point, the barriers that have been discussed have primarily been tangible, such as lack of funding and staff. However, system norms is an intangible system-level part as it refers to normative values, expectations, assumptions, or normative behaviors within or outside the school setting that interfere with the implementation of state anti-bullying policies. Overall, these norms served as barriers and interfered with anti-bullying and school climate improvement efforts. Three sub-themes emerged under system norms, namely 1) lack of commitment and engagement, 2) normative use of the word ‘bullying’ and 3) external norms.

Lack of commitment and engagement. Participants referred to the lack of commitment and engagement among staff and parents, which made anti-bullying and school climate improvement efforts more difficult. At times, school staff were not fully vested in school practices that promoted positive student behaviors. In other instances parents were not engaged in the life of the school, which made outreach and bullying/behavioral related training more difficult to conduct among parents. For example, one participant who responded to the statewide survey indicated that “Not everyone [staff] is committed to forming relationships [at the

school] and that can have discouraging and adverse effects on those who are trying to improve school climate". Other participants indicated the need for more staff "buy-in", and "staff commitment" to anti-bullying and school climate related efforts. Others stated that "…not everybody [staff] believes in this", "it's hard to get everybody on board" and that there are "pockets of resistance" at the school.

This resistance and lack of buy-in did not occur arbitrarily, but rather, appeared to be a byproduct of school staff members having a wide-range of responsibilities and lack of time to fulfil these obligations. For example, one school climate specialist stated the following in regards to organizing school climate committee meetings.

> Not to be negative, I haven't seen any positives just yet. I mean, I had one safe school climate meeting so far with my team here. To be honest with you I had to bring in Panera [food] to bribe them to come in [to the meeting] for it, because again, it's like one more meeting, one more thing that you have to try get people to volunteer to do because there's no time to do it during the day.

Similarly, another participant described staff resistance to support the school's Positive Behavioral Interventions and Supports Program (PBIS).

> … [I] was trying to get people on board with PBIS. You know any time that there's a change, some people are going to buy into it, and some people aren't, so getting folks to buy in was certainly a challenge and continues to be a little bit. I would say the majority of the folks in the building have bought into it, but there are some that still haven't.

Normative use of the word 'bullying'. A second sub-category, normative use of the word 'bullying', reflects parents' overuse of this term to describe a wide-range of student problem behaviors. This was viewed as a barrier as it unnecessarily increased the amount of bullying investigations that needed to be conducted. Participants stated that, "the term bullying is overused and confused

[by parents]", "parents use the word 'bullying' liberally', and "the word bullying is being used in the wrong contexts by parents". While schools often relied on the legal definition of bullying, the norm among parents was to use the word bullying as a proxy for different types of inappropriate behavior. For example, one participant stated "I think the perception of what constitutes bullying among the grown-up population probably has expanded to include just about everything that bothers them." Similarly, another school climate coordinator reported the following.

> It seems [that the word bullying] triggers parents to respond and take little things such as a kindergartener cutting in front of a child [while standing in line] when they're in the cafeteria as bullying, as opposed to real, normal, everyday type of behaviors that kindergarteners do. Parents are more reactive to saying the word 'bullying' rather than saying "That wasn't nice" or "That was rude; we need to work on manners". [Instead] they're constantly using that word bullying.

In many ways parents' use of the word bullying poses challenges to schools as these bullying allegations are required to be formally investigated according to the law. Such an overflow of allegations can deplete school resources such as staff and time. These disparate interpretations led to a certain degree of tension between schools and parents. One participant described this tension as follows.

> I think there's a normal tension that has occurred, that says that parents have one interpretation of the law [the word bullying], and school districts have another interpretation of the law [the word bullying], and sometimes that creates tension when the school may not see something the way a parent sees it.

Conflicting external norms. A final subtheme of system norms, *conflicting external norms*, refers to norms outside of the school setting that permeate the

school environment and affect anti-bullying and school climate improvement efforts. These external norms function as barriers as they often interfere with efforts to make the school safer. For example, one participant discussed the ubiquitous use of the word 'gay' to connote something negative.

> Part of society is saying that being gay or lesbian is a bad and evil thing. In school we have to sort of teach kids how to be inclusive and accepting of differences, yet that's not really what they hear in society. So that becomes a challenge for us, that we have to stand up and talk about. And, sometimes in the face of that, schools get criticized for that. So we have to be willing to take positions on issues that aren't necessarily popular in society.

Similarly, another participant discussed the general lack of respect among adolescents, and how this is reflected in their interactions with peers, their parents and teachers.

> It's hard. I can't tell them how to parent; that's how they're raising their child. So that's a challenge we have that I would say it's almost a society issue, where the kids don't treat their parents with respect, they don't treat each other with respect, and sometimes they don't treat their teachers or administrators with respect**.**

Further, at a more local level, participants described how neighborhood and family norms interfered with school efforts. For example, a school climate specialist described how aggressive behaviors can become adaptive and normalized in high-risk community settings.

> I just think of our location, where we're located. We're in a tough neighborhood, we've got a lot of kids who come from very tough backgrounds, and we have tough parents who you know these parents a lot of times their way of settling differences is to … take on a very aggressive approach. … a lot of our kids will say, "My mom told me if anybody says blah blah blah, I'm supposed to punch them." So you're having to not only change the students, but the entire family perspective on what behaviors are acceptable in school, what behaviors are acceptable with peers, what behaviors are acceptable in different situations.

Facilitators to Implementation

In addition to implementation barriers, participants discussed a series of factors that facilitated implementation. The system parts that served as facilitators are human resources, (e.g., professional development), social resources, which broadly refers to connections between organizational entities, and system operations (i.e., school leadership). In many instances these were described as beneficial to implementation, but in other instances were described as facilitators because they helped to offset the inhibiting effects brought forth by some barriers.

Human resources. Human resources represents a system part and includes factors such as skills, competencies, and knowledge, suggesting that having a specific skill-set can facilitate the implementation of anti-bullying and school climate improvement efforts. Two sub-categories emerged under human resources: 1) *professional development and training*, and 2) *guidance and information*. Overall, across both sub-categories, participants reported how formal training and general guidance, respectively, was helpful to better understand the legislation (e.g., definition of bullying, policy, reporting requirements) and the need to understand how to implement school-based interventions to address student behavior.

Professional development and training. Professional development and training served as an enabler to implementation and included references to training, workshops, seminars, conferences, or other venues that could enhance the skill-set of school stakeholders. One participant who was interviewed discussed how attending the Connecticut Accountability for Training Initiative

(CALI) training served as the catalyst that enabled the school district to effectively conduct bullying investigations. This school climate coordinator stated as follows.

> Well, you know I think the CALI training was outstanding and was really, um, was really helpful. Prior to that I feel like we were just sort of muddling along, you know, getting by. I think ongoing training and support from somewhere is needed; especially when you are doing these bullying investigations. It can be really hard to sort through all of the information...

Interestingly, training was described as a facilitator, but it was often in response to "complex and confusing policies", which was one of the aforementioned implementation barriers. For example, training was particularly useful in helping schools understand the complex legislation as it clarified the legal definition of bullying and how to translate it into practice. One participant discussed how a state official who provided training and support to schools across the state was instrumental in clarifying definitional aspects of the legislation related to the word bullying.

> I think it's been very helpful [during the training] to have Sandra [name replaced for confidentiality purposes] and her emphasis on *mean* behavior instead of making it a termed legal definition of 'is this bullying?'; really focusing on what does 'mean' feel like and we've really adopted that. I think that's easier for our staff to recognize and for kids to recognize when things are just unkind [as opposed to using the word bullying]

Thus, the training instructed schools to not focus as much on the legal definition of bullying, but to focus more broadly on whether the behavior is "mean" given that there is more consensus regarding the latter.

Guidance and information. In many instances schools did not need formal training, but rather, expressed the need to be informed. Guidance and information

was an implementation facilitator. This included broader references to how information, typically from the state, helped or could help schools to be more aware of what is occurring state-wide and the kinds of activities they could implement. This included general references to “informational resources”, “lists of trainers who could provide professional development [in regards to bullying and school climate topics]”, lists containing evidence based-programs from which schools could select, and general information or clarifications concerning the law. For example, participants referred to needing “help identifying model programs”, “help with identifying model anti-bullying programs’, “ a list of suggested presenters for school presentations”, and “suggestions for school climate and anti-bullying curricula”. Thus, schools did not necessarily need formal professional development, but rather, they needed general information and guidance that would keep them informed and could guide their work.

Social Resources

Social resources is another system part that facilitates implementation of school anti-bullying and climate improvement efforts. This refers to social relationships or interconnections between stakeholders (e.g., staff, parents) or organizations within a system. These connections provided an added value (e.g., informational exchanges) in contrast to individuals operating in isolation or in silos. Four types of interconnections between stakeholders were identified: 1) state-school, 2) inter- and intra-district, 3) school-parent, and 4) school-community.

State-district interdependence. State-district interdependence is the first interconnection, and refers to schools that interacted with the Connecticut State Department of Education. Typically, these exchanges were informational in which communication(s) were provided to schools/districts (e.g., informational updates, email communications) by CSDE. This sub-category often overlapped with the guidance and information sub-category of human resources. However, state-school interdependence focuses on the relationship or interconnection between schools and the CSDE. In contrast, the aforementioned 'guidance and information' sub-category focuses on the information that is provided through this connection. Stated differently, the inter-dependence between schools and the CSDE is a conduit for informational exchanges and facilitates the ability for schools to receive information that guides their efforts. Examples of this theme included references to the need for "communication from the state", "timely communication", "updates to policy revisions", and "keeping us informed". In addition, participants often referred to Sandra[1], a state-level employee responsible for monitoring this anti-bullying and school climate initiative and who provided significant support to school districts. Schools and districts that had a relationship with this state official often expressed that this connection was instrumental in guiding their school-climate improvement efforts. A participant stated the following.

> I would say, as a district, probably the biggest help was Sandra's availability and willingness and interest in spending a lot of time in our district helping us initially. I would say that was probably the biggest resource.

[1] Pseudonyms are used throughout in order to protect confidentiality.

Another participant discussed how this connection allowed for regular communication.

> We have a slight sense [about how to go about this work], but that's only because we talk to Sandra fairly regularly and we communicate with her and she communicates with us, but I don't know where other districts are at with that.

Finally, another participant's comment shed light on how this state employee demonstrated a high level of engagement and commitment to their school district.

> Sandra, without a doubt. I mean she has been with us all the way. She is enormously helpful, she is always there, she is always responsive, she has been very, very supportive of us through, really through all of this. I can't speak highly enough. She truly has been there to help support us and help figure these things out which again are not necessarily so black and white all the time. She has helped us to find clarity in some of the sea of confusion.

Thus, having a more personal connection with a state-level official who is committed was particularly instrumental. Taken together, state-district interdependence reflects a level of connectedness with the state department of education that allowed informational resources and other forms of support to be provided to districts.

Inter- and intra-district interdependence. Inter- and intra-district interdependence refers to the interconnections between school districts or interconnections between schools within the same district. These exchanges are typically meetings (e.g., events, conferences, round tables, summits) in which staff members from different districts and schools could share experiences, ideas, best practices, or network. For example, participants referred to the need for "opportunities to collaborate with others districts", "round tables with other

schools to share ideas", "routine meetings with other school climate coordinators to share best practices", "regional meetings" and "summits".

Opportunities to network and collaborate with other colleagues were viewed as helpful as it allowed districts to share ideas and strategies about how to handle implementation challenges, especially in relation to bullying investigations. For example, one school climate coordinator stated the following.

> People [in my district] have gone to other schools and districts to observe other districts' variations of how they're handling it [the new legislative requirements], so there's that sharing of ideas. And it's a support system - any problems you're having, how have you gotten past them? I think that part is extremely positive.

Similarly, another participant stated the following.

> But I know in my peer group, I've reached out to other schools also, we're all dealing with the same thing. "What're you going to do with this?" or "How are you going to present that?" and we did some sharing of documents or ideas, but it just seems like so much extra work for people to do individually …

In some instances this level of collaboration occurred across schools within the same district. For example, a school climate specialist described how meetings among school climate specialists were purposely convened in order to discuss challenges and best practices.

> We actually have a team that is facilitated by the school climate coordinator and the school climate specialist in each building where we have an opportunity to brainstorm, and look at what each of our buildings are doing, and how effective or ineffective it is, or you know tried. We also have an opportunity to share those effective factors and see how they're all calibrated.

Not only are ideas shared, but this inter- and intra-district communication helped to ensure uniformity in practices across schools. A school climate coordinator states the following.

> One of the challenges has been getting everyone on the same [page]…and how can we make sure that the right hand knows what the left and is doing, you know, so that issues that are being handled in one building are being handled in a similar way across the district. I think it's really been around coordinating our efforts administratively as well as each climate team having some knowledge of what the other buildings are doing so that there's some continuity and carry over from building to building and grade to grade.

Thus, having a level of interdependence with other school districts or schools within the same district created a professional network that facilitated informational exchanges, uniformity, and enabled implementation efforts.

School-parent interdependence. School-parent interdependence refers to schools being connected to parents. Typically, participants talked about a wide range of areas, such as "parent involvement", "parent engagement", "parent buy-in", "training and educating parents", communicating with parents", or any references that suggest the importance of school-parent connections. This sub-category often overlapped with the professional development and training sub-category of human resources (e.g., need for parent workshops), and with the commitment and engagement category (e.g. lack of parent buy-in) under norms.

In general, the implication is that school anti-bullying and school climate implementation efforts can be enhanced with a stronger school-parent connection. One school climate coordinator in a high-poverty school discussed how her charter school highly emphasized parent engagement, which helped parents become part of the school community. This parent engagement supported the school's climate efforts.

> We require parents to give voluntary time here. The parents, when they're here during that required time, they get to see the climate of the building and see what the expectations are here so that when we are calling them

> [on the telephone] they know that we're not just holding their child accountable, we're holding everybody accountable. And then they're invested in it because they're part of that climate. They build it by the [voluntary] time that they give. There's parents volunteering, helping the gym classes, helping the kitchen with serving food. So they're part of the climate that makes us who we are. So they take it personally when we do call them and share something that's not going well because they know what the expectations are here at our school."

By engaging parents in the school community, parents are more likely to commit to the school's behavioral expectations. Engaging parents into the life of the school can help then to understand and be amenable to the school's behavioral standards. For example, the school climate coordinator from the above-mentioned charter school stated the following.

> [parents are] familiar with the staff in the school. So when you're calling to report something [negative about their child] they've interacted with that staff person and they know their personality, and it's not going to go automatically to, "Well my child said.." It's going to be, "Well I met that teacher and I understand what their expectation is, so I'm not surprised …for you know not following directions because I know what the teacher's standards are." So I think that helps when parents are involved.

School-community interdependence. School-community interdependence represents a final sub-category of social resources, which refers to established relationships or connections between districts/schools and the outside community. Typically, these connections were with community-based organizations, agencies, or city departments (e.g., police department). These relationships helped schools to leverage community resources, such as personnel, who could assist schools with school-based interventions, trainings, and school-wide anti-bullying events or activities. In many ways, school-community interdependence reflects a way of gaining access to a wider cross-section of resources, such as personnel who could

assistant with anti-bullying and school climate improvement efforts. For example, one school climate coordinator discussed collaborating with the local youth service bureau.

> Our youth service bureau here works with youth. They have programming like after-school programs, during the day programs, outreach to families; they're a wonderful resource in the community and towns have something similar, either they have a youth service bureau or something similar ... Our youth service bureau has collaborated with the school district and we pretty much work hand-in-hand on a lot of issues, one of which was the bullying issue and we said 'well, to really be effective in the community, it's great to have an objective point of view when intervening with parents or dealing with staff'. We decided to train youth service staff as school climate trainers who are now able to go out to our schools and also train our teachers.

System Practices

System practices represents another system-level component generated by the data, and that is not originally part of the transformative system change framework (Foster-Fishman et al., 2007). System practices is an implementation facilitator and included references to formal school interventions, activities, or programs that aim to mitigate bullying or improve school climate. System practices consisted of two general themes, school interventions and pre-existing interventions and infrastructure.

School interventions. The theme of school interventions included references to school interventions, strategies, and activities aimed at addressing bullying and school climate. This sub-category also included references to the manner in which these school interventions or programs were delivered (i.e., program fidelity). Participants mentioned a wide-range of structured interventions or programs relating to bullying, school climate improvement, and

other student problem behaviors. A sampling of programs mentioned include Positive Behavioral Interventions and Supports (PBIS), peer-mediation, Responsive Classroom, character education, 40 Developmental Assets, Nurtured Hearts, Boys and Girls Town, Character Works, and Project Wisdom. In some instances broad references were made such as to "anti-bullying programs" that did not specify a specific program. In general, school interventions (e.g., activities, interventions, programs) served as the most purposeful and proximal mechanism to students by which schools addressed school climate improvement and bullying. In some instances participants referred to the fidelity with which programs were implemented suggesting that the delivery and operation of interventions was as important as having the intervention. In other words, poor program fidelity can interfere with meeting program objectives.

Pre-existing infrastructure. Pre-existing infrastructure is very similar to the previous category, but in this case refers to the notion that some schools already had an infrastructure in place to address bullying and school climate related issues by the time PA 11-232 was enacted. Although this category is very similar, I decided to distinguish this category from the previous sub-category (school interventions) because the research literature has documented the importance of schools' "readiness" and "preparedness" in implementation efforts (Robbins, Collins, Liaupsin, Illback, & Call, 2004). Thus, pre-existing infrastructure is an implementation facilitator and included references to interventions or programs that already existed at the school prior to PA 11-232. Schools that had an existing infrastructure in place viewed the law as simply

formalizing their on-going work. As a result, participants indicated that implementation of PA 11-23 was not very challenging because a framework was already in place. One school climate specialist stated the following.

> Through PBIS we were already involved in having a school-by-school committee. We already had a framework in which we would be discussing, looking at data, looking at discipline data, we used SWIS [School-wide Information Systems] data. So the benefit in terms of school climate is it really all comes together.

System Operations

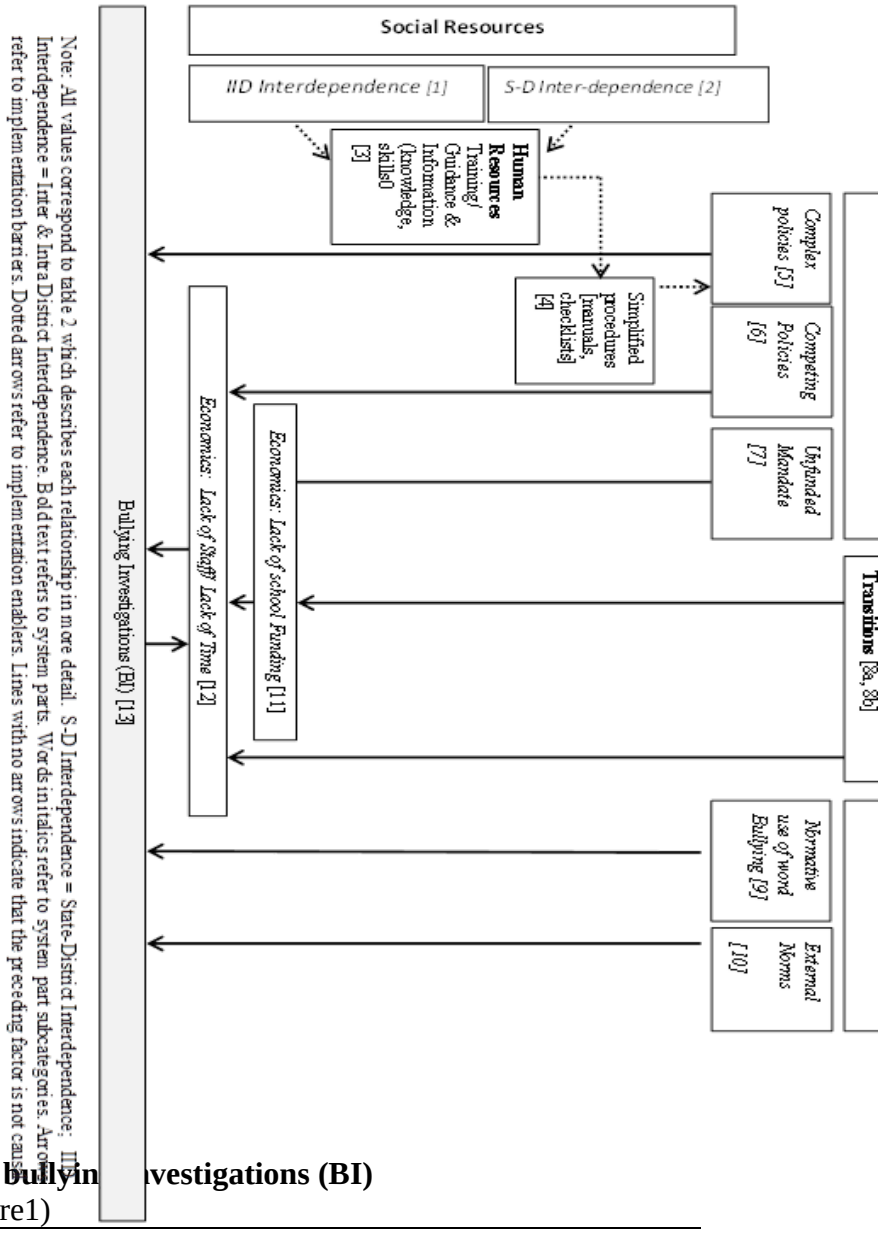
Most of the barriers and facilitators discussed have not focused as much on specific people and dynamics of power within the system. *System operations* reflects specific individuals who are able to spearhead and champion anti-bullying and school climate related efforts. For example, specific individuals or entities within a system may assert more power and can play a significant role in implementation efforts by championing the initiative. School administrators (e.g., principals, vice principals) were particularly instrumental in moving school climate improvement efforts forward, particularly by setting the tone for the school, which then influences staff members to engage in these efforts. For example, a school climate coordinator reported the following about the school principal.

> You know not everyone believes in this and it's hard to get everybody on board. Having building administrators on board makes all the difference because they are able to spearhead it more. I can think about my school district and point out one principal who has love this and works very hard towards this and there's quite a bit of improvement…So when the leader has that buy-in then it trickles down to the staff. And our central office administration has that buy-in as well.

System Dynamics:

How are system-level parts that challenge or facilitate the implementation of state-level legislative anti-bullying requirements inter-connected?

The second research question concerned the identification of system dynamics. In other words, this question explored how the respective parts of the system are interconnected, and interact systemically to obstruct or facilitate implementation. System components cannot be fully understood in isolation and must be understood within the context of their direct or indirect interconnections with other system parts (Foster-Fishman et al., 2007). For purposes of portraying these system dynamics, two models were developed, one for each of the legislative requirements (i.e., bullying investigations, school climate improvement). Figures 1 and 2 provide a holistic presentation of barriers and facilitators to the implementation of bullying investigations and school climate improvement. Each interconnections is based on participant responses. Solid black arrows represent barriers to implementation, whereas dotted arrows represent facilitators (see footnotes for Figures 1 and 2). Conceptual system dynamic frameworks were not developed for the legislative requirements of school climate committees and administering school climate surveys because these areas did not yield a wide-range of system parts. For example, competing priorities and lack of time emerged as the only barriers to convening school climate committees.



Note: All values correspond to table 2 which describes each relationship in more detail. S-D Interdependence = State-District Interdependence; IID Interdependence = Inter & Intra District Interdependence. Bold text refers to system parts. Words in italics refer to system part subcategories. Arrows refer to implementation barriers. Dotted arrows refer to implementation enablers. Lines with no arrows indicate that the preceding factor is not caus

Table 2:
Barriers and facilitators to bullyin vestigations (BI)
(Table 2 corresponds to Figure1)

1. *Inter- & Intra-district Interdependence* [Human Resources]: Connection between schools and districts facilitates knowledge of strategies, practices, and how others handle bullying investigations.

2. *State-district Interdependence* [Human Resources]: Relationship with the

state department of education facilitates professional development, information, and understanding of state policy related to bullying investigations, the definition of bullying, and how to conduct bullying investigations.

3. Human Resources [Simplified Procedures]: Professional development and guidance/information provide better understanding of law, BI, and enables the development of school- and district-wide procedures, policies, and protocols.

4. *Simplified Procedures* [Complex Policies]: Simplified procedures, policies, and protocols help to distil the legislation, and translate it into predicable and standardized practices.

5. *Complex Policies* [BI]: Complex and confusing policies, and the confusing and ambiguous nature of the word bullying make bullying investigations more difficult to determine, longer, and stressful.

6. *Competing Policies* [Economics]: Competing policies and legislative priorities limit the amount of staff and time available to conduct BI.

7. *Unfunded Mandate* [Economics]: PA 11-232 is an unfunded mandate and does not contribute new monies. Additional monies could be used to hire personnel or provide training in order to effectively conduct BI.

8. *System Structures & Transition:*

    a. [Lack of Funding]: Some school districts experience challenges such as concentrated poverty, and as a result have lower levels of district-wide funding to enable the resources (e.g., staff) needed to conduct BI.

    b. [Lack of Staff/Time]: School size (e.g., large student body, small schools) plays a role in having sufficient staff to conduct BI. In addition, school transitions such as student absences & school vacations limit staff time and make information gathering difficult during BI.

9. *Normative use of the word Bullying* [BI]: Liberal use of the word bullying leads to more bullying incidents that must be legally investigated.

10. *External Norms* [BI]: External norms contribute to student problem behaviors (e.g., aggressive behavior, problem behaviors that are acceptable among youth), and leads to more incidents that must be investigated.

11. *Lack of Funding* [Lack of Staff/Time]: Lack of funding limits ability to hire staff who could assist in conducting BI.

12. *Lack of Staff/Time* [BI]: Lack of staff and time limit the ability to conduct BI.

13. *Bullying Investigations* [Lack of Staff/Time]: Bullying investigations deplete school and district resources such as staff time.

Note: BI = Bullying Investigation; each number corresponds to the relationship displayed in Figure 1; Terms in italics represent the starting point of the relationship in Figure 1 and terms in [ ] represent the end point of the relationship.

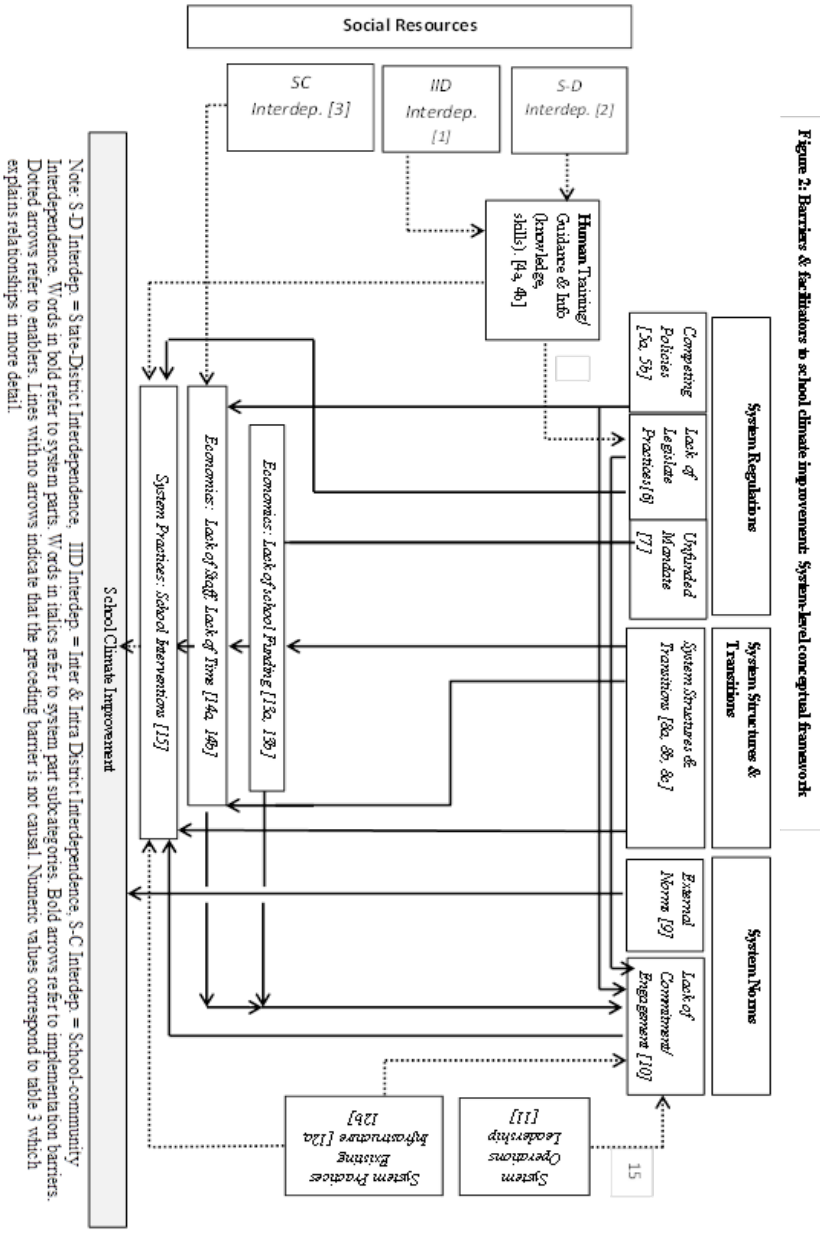


Table 3:
Barriers and facilitators to school climate improvement
(Table 3 corresponds to Figure 2)

1. *Inter- & Intra-district Interdependence* [Human Resources]: Connections between schools and districts facilitate knowledge of strategies, practices, and interventions (e.g., character education, PBIS) related to SCI.

2. *State-district Interdependence* [Human Resources]: Connection with state department of education facilitates knowledge of state policy related to SCI as well as strategies, practices, and interventions.

3. *chool-community Interdependence* [Economics]: Connections with community organizations provide more resources (e.g., staff) to improve school climate.

4. *Human resources*

a. [System Practices]: Professional development and guidance/information provide better understanding of school- and district-wide interventions, practices, and strategies to improve school climate.

b. [Lack of legislated practices]: PA 11-232 does not require specific school-based interventions, and professional development/informational guidance helps to fill in this gap.
c.

5. *Competing polices*

   a. [Economics]: Competing policies and legislative priorities limit the amount of time dedicated to SCI.

   b. [Lack of Commitment Engagement]: Competing policies and legislative priorities draw staff attention away from anti-bullying and school climate priorities and limit staff engagement in SCI efforts. & Engagement]: Competing policies and legislative priorities.

6. *Lack of Legislated Practices [*System Practices]: Lack of emphasis on specific school-based interventions within the legislation limits the extent to which schools incorporate evidence-based interventions to address SCI.

7. *Unfunded Mandate* [Economics]: PA 11-232 is an unfunded mandate and does not contribute new monies.

8. *System Structures & Transitions:*

   a. [Lack of Funding]: Some school districts experience concentrated poverty and as a result have lower levels of district-wide resources (i.e., funding) needed to advance SCI efforts.

b. [Lack of Staff/Time]: School size (e.g., large student body, small schools) plays a role in staffing needed to advance SCI efforts (e.g., staff to implement interventions, staff who could provide coverage during trainings).

c. [System Practices]: School transitions such as student absences and school vacations limit staff time and make the implementation of school interventions, activities, and programs more.

9. External Norms [School Climate]: External norms contribute to student problem behavior (e.g., aggressive behavior) and these normative behaviors negatively affect school climate.

10. *Lack of Commitment/Engagement* [System Practices]: Lack of staff engagement and commitment is manifested through resistance to school practices, strategies, programs, and/or interventions geared toward SCI.

11. *Leadership* [Lack of Commitment/Engagement]: School leadership (e.g., principals) can lead staff to engage in school practices despite resistance.

12. *Existing Infrastructure:*

a. [Lack of Staff Commitment/Engagement]: Schools that had an infrastructure in place and were already engaged in SCI efforts by the time PA11-232 was enacted had a more committed/engaged staff.

b. [System Practices]: Schools that had an infrastructure in place had SCI practices and interventions in place by the time PA 11-232 was enacted. These schools demonstrated more implementation "readiness".

13. *Lack of Funding:*

a. [Lack of Staff Commitment & Engagement]: Lack of funding limits staff commitment to SCI.

b. [Lack of staff/Time]: Lack of funding limits the ability to hire staff needed to implement interventions, activities, trainings, and advance SCI efforts.

14. *Lack of Staff/Time:*

a. [Lack of Staff Commitment & Engagement]: Lack of staff and time limits staff commitment to SCI.

b. [System Practices]: Lack of staff/time limits personnel who could carry

out SCI practices, programming, and/or interventions.

15. *System Practices* [School Climate Improvement]: School practices, activities, programs, and interventions promote SCI efforts.

Note: SCI = School Climate Improvement; each number corresponds to the relationship displayed in Figure 2; Terms in italics represent the starting point of the relationship in Figure 2 and terms in [ ] represent the end point of the relationship.

Moreover, it is important to note that in many instances a barrier can also function as an enabler (and vice versa). For example, in Figure 2 lack of commitment and engagement (e.g., staff resistance) is depicted as a barrier to the implementation of school climate improvement activities. However, the *presence* of commitment and engagement can serve as a facilitator. Although factors can function as both, such as in this example, the diagram depicts the manner in which they were typically discussed by participants. In other words, commitment and engagement can serve as either a barrier or facilitator, but participants mainly discussed this notion as a barrier as they discussed challenges related to the lack of staff buy-in, engagement, and commitment.

Bullying Investigations

Overall, several points are worth mentioning. First, many barriers to implementation, such as competing policies, and system structures and transitions appear to indirectly affect implementation processes by affecting school resources such as staff, and staff time (see Figure 1, relationship 6). For example, competing policies and priorities led staff to focus on a range of federal and state mandates, and in turn, this limited the amount of time that school personnel could devote to bullying investigations. Secondly, some barriers are directly associated with

bullying investigations. For example, the direct link between normative use of the word ‘bullying’ and bullying investigations (Figure 1, relationship 11) suggests that as parents use the word bullying more liberally, it creates a higher volume of cases that must be legally investigated. The high influx of suspected bullying cases makes it more difficult for staff to investigate these cases, and results in a depletion of personnel and staff time (Figure 1, relationship 15).

Finally, facilitators to implementation are represented by dotted lines. First, social resources are represented as facilitators to implementation, namely, state-school interdependence and inter and intra-district Interdependence. Thus, participants reported that being linked to the state department of education, other school districts, or other schools within the same district was conducive to professional development, guidance, and other resources that were needed to effectively comply with the bullying investigations. In other words, when schools operated in an isolated fashion, within silos, this prevented them from gaining important information (e.g., clarifying the definition of the word bullying, clarifying legal requirements) that would have enabled them to appropriately conduct bullying investigations.

School Climate Improvement

Figure 2 presents a conceptual framework depicting barriers and facilitators to the implementation of school climate improvement activities. The interpretation of relationships between concepts in this diagram is similar to that of Figure 1. As displayed in Figure 2, this framework contains a wider range of system-level parts, as compared to bullying investigations (Figure 1) that play a

role in implementation processes. This is largely attributable to the fact that bullying investigations, previously discussed, represent a narrow activity that is typically the responsibility of one or two school staff members. Nevertheless, this implementation framework is similar to that of bullying investigations, which suggests that, overall, many of the processes that underlie the implementation of state anti-bullying processes are consistent regardless of whether the focus is school climate improvement or bullying investigations. For example, in both frameworks, broader system-level parts (e.g., system regulations, system structures and transitions) indirectly affect implementation by influencing factors such as funding, staff, and staff time. Similarly, some of the implementation facilitators are similar across both frameworks such as social resources (i.e., interdependence).

There are some unique patterns and differences that distinguish Figure 1 (bullying investigations) and Figure 2 (school climate improvement). For example, school-community interdependence and school leadership (System Operations) emerged as facilitators to school climate improvement activities, whereas this was not the case for bullying investigations. In addition, schools with an *existing infrastructure* of school climate related activities prior to the enactment of PA 11-232 were better equipped to implement school climate improvement activities. Thus, it appears that the implementation of school climate improvement efforts calls for a broader mobilization of system parts as compared to the implementation of anti-bullying investigation requirements.

Discussion

This study examined the implementation of state anti-bullying legislation in the state of Connecticut following the enactment of Public Act 11-232.Using the transformative system-change framework (Foster-Fishman et al., 2007), this study investigated the system-level parts that are instrumental to the implementation of these legislative requirements and examined system dynamics by elucidating how these system parts are interconnected. This study contributes to this body of research by yielding a comprehensive framework that informs the implementation of state anti-bullying policies within school settings.

System-level parts as barriers and facilitators to implementation

One of most significant contributions of this study is the identification of system parts, and their sub-categories, that play a role in the implementation of state anti-bullying and school climate improvement requirements. This study is consistent with work conducted by Foster-Fishman and colleagues (2007) as it identifies system-level components contributing to the implementation of anti-bullying policies, namely system regulations, human resources, system norms, social resources, economics, and system operations. However, two additional system parts were identified; system practices and system transitions and structures. The addition of these system parts expands our understanding of system-level processes that are specific to the implementation of state anti-bullying policies. These additional system parts (i.e., system structures and transitions, system practices) largely reflect conditions or activities within the school context. This resonates with previous work that identified factors within the school setting as limiting the effectiveness of broader policy directives

(Moore, Murphey, Tapper, & Moore, 2010). In addition, this study further distills these system-level parts by identifying sub-areas that function as barriers or facilitators. Recent work has called for the need to better understand factors that enable or inhibit the implementation of state anti-bullying laws (e.g., Cornell & Limber, 2015), and the identification of these sub-areas helps to inform a more nuanced understanding of implementation processes.

System regulations. Study findings reveal the role of broader policy-level barriers that are inherent to the legislation, as well as how other state and federal policies interfered with implementation efforts (i.e., competing priorities). Paradoxically, we identified three policy-related barriers that were specific to PA11-232 (i.e., complex and confusing policies, lack of legislated practices, and unfunded mandate), which underscores how some barriers resulted from the way the law was originally written. Thus, anti-bullying laws should be carefully constructed to be conducive to implementation. For example, participants commonly discussed their confusion with the way the term bullying is defined and how it should be interpreted in practice. Previous work has documented problems with the word “bullying,” such as difficulty in differentiating between bullying and other aggressive behaviors (Cross et al., 2011; EMT Associates, 2013). However, research also suggests that schools lacking codified policies and procedures have less clarity about bullying and have varied interpretations of the same policy (Locke et al., 2015). This is consistent with our findings as some participants discussed the benefits of developing protocols and checklists that translated the requirements into a more user-friendly form. Policies and

procedures institutionalize change and guide behavior (e.g., Foster-Fishman et al., 2007). Refining policies into protocols enables school personnel to predictably and uniformly comply with policy requirements.

PA 11-232 was also viewed as deficient due to being an unfunded mandate, and secondly due to its inability to legislate concrete evidence-based practices. The distribution of funding within a system sheds light on priorities (Foster-Fishman et al. 2007). The lack of funding supporting state anti-bullying laws has been documented in previous work (Kestor & Mann, 2008), and calls into question the priorities of anti-bullying policies. The law was also viewed as deficient because it did not articulate evidence-based practices that could be implemented in schools. Bullying involves a complex pattern of behaviors, and it is recommended for multi-faceted interventions to be implemented that address this complexity (Bradshaw, 2015). Delineating evidence-based interventions within the law can prevent schools from relying on interventions lacking empirical support. For example, schools commonly rely on single-session activities, such as school assemblies, which raise awareness, but are unlikely to mitigate bullying (Bradshaw, 2013). State anti-bullying laws are needed that incorporate more explicit language regarding interventions with an empirical base. Taken together, research has often conceptualized implementation challenges as being school-specific, and these findings suggest that state anti-bullying policies are likely to encounter implementation challenges due to the way they are written.

Finally, participants discussed the notion of competing policies, or the idea that schools are beholden to myriad federal and state-level policies, such as complying with teacher evaluations and common core standards. This theme resonates with findings of a qualitative study conducted among developers of several school-based evidence-based interventions (Forman, Olin, Hoagwood, Crowe, & Saka, 2009). Forman and colleagues (2009) found that the No Child Left Behind Act (NCLB) challenged the implementation of school-based programs because it led schools to be more academically focused to the exclusion of social-emotional health (Forman, Olin, Hoagwood, Crowe, Saka, 2009). Schools are constrained by broader contextual factors and competing priorities (Moore, Murphy, Tapper, & Moore, 2010). Schools consistently cycle through highly politicized reforms and initiatives, such as NCLB and the common core standards, as found in this study. The role of these broader social-political contexts and reforms warrant close attention, especially when they are legally binding, impact funding, and are highly politicized in popular media.

Some research suggests that ineffective school management can exacerbate the challenges related to these competing priorities. For example, lack of role clarity and schools' inability to establish protocols that guide school personnel in sorting through these obligations can add to these challenges. School administration may alleviate this ambiguity by delegating roles, responsibilities and schedules for school staff (Locke et al., 2015). Qualitative work examining the implementation of Response to Intervention (RTI) frameworks highlights the need for school leadership support and building-level protocols that clarify who is

responsible for specific activities (Marrs & Little, 2014). Thus, clarifying expectations and responsibilities can allow school climate coordinators and specialists to negotiate competing policy priorities and commitments. More broadly, this suggests that policy-level barriers do not operate in isolation, but rather, interact with school-level deficits such as the lack of clarity regarding roles and responsibilities.

System Structures and Transitions

Our findings showed that broader environmental factors (e.g., school size, school schedule, student absences, vacations) challenged implementation processes. This finding extends beyond the transformative system change framework by identifying environmental features that set boundaries on resources and activities. Owens and colleagues (2014) contend that schools differ from other organizational settings because they operate according to a 9-month calendar and are often characterized by different bursts in energy throughout the school year, such as grading periods, vacations, and state testing. Additionally, recent work by Hattaja and colleagues (2015) indicates that program fidelity diminishes toward the end of the school year. These setting characteristics have implications for the implementation and should be considered in any state-wide effort to address bullying (Haataja et al, 2015; Owens et al., 2014).

Economics

Resources, such as the lack of funding, school personnel, and time were also barriers to implementation processes. This is consistent with previous research examining state anti-bullying laws (e.g., Kester & Mann, 2008; EMT

Associates, 2013) and with implementation studies that have examined how evidence-based programs are carried out within school and community contexts (Durlak & Dupree, 2008; Forman et a al., 2009). Funding is essential to implementation processes, and it is noteworthy that state anti-bullying laws are commonly enacted without the appropriation of funding (Stuart-Cassel, 2011). As of 2011 only three states had laws that included language identifying funding to support bullying prevention programming (Stuart-Cassel et al., 2011). As evidenced in this study, funding catalyzes a series of resources (e.g. staff, materials) and practices (e.g., school interventions). The importance of funding should not be minimized.

System Norms

System norms are regarded as one of the most significant areas to promote system-level change (Foster-Fishman et al., 2007). Consistent with previous work (e.g., Forman et al., 2009; Locke et al., 2015), we found lack of staff commitment to be an implementation barrier. However, from a systems standpoint, lack of staff engagement appears to be the byproduct of contextual factors. For instance, lack of resources, such as funding and time, and competing policy priorities can lead school staff to become resistant to change (see Figure 2, relationships 7 and 19). Staff resistance is often viewed as an individual attribute. However, our findings highlight a more contextualized understanding in which lack of staff engagement is a response to having more responsibilities while simultaneously not being afforded necessary resources (e.g., funding, time). This resonates with Weiner (2009), which draws upon social-cognitive theory and contends that members in

an organization generate appraisals in determining implementation capability. These appraisals are determined by task demands, resource availability, and situational factors (Weiner, 2009).

Moreover, this study showed that parents' normative use of the word bullying conflicted with the way in which school personnel interpreted this term. This marks a significant barrier to mandated reporting and the investigation of suspected bullying. Parents were perceived as using this term too "liberally," which conflicted with the state's legal definition. Previous work reveals a lack of consensus about the behaviors and definitions that constitute bullying (e.g., Humphrey & Crisp, 2008; Lee, 2006; Mishna, 2004; Sawyer, Mishna, Pepler, & Weiner, 2011). Moreover, Farrell (1999) found that some school personnel can be ambivalent about using the term bullying, leading them to use words that communicate less intensity (e.g., unacceptable behavior). School staff may also use terms with less intensity to avoid stigmatizing children. However, research by Brown, Aalsma, and Ott (2013) suggests that some parents may use the term bullying because they believe it can prompt school officials to be more responsive. For example, behavior that is described as bullying as opposed to 'inappropriate' connotes greater urgency.

Hence, language can have powerful gatekeeping implications as student behavior can be framed as trivial (e.g., kids being kids), or within a legal space (e.g., bullying) that mobilizes a series of school responses. The use of language raises important implications. Bullying investigations can usurp school resources such as staff, time, and funding, and it is possible that schools may be inclined to

use a more conservative definition in order to conserve resources. At an extreme, strict adherence to legal definitions of bullying can counter the intentions of anti-bullying policies by leading staff to dismiss problematic behaviors that do not meet legal criteria.

Human Resources

Findings revealed the need for specific competencies and skills, which is consistent with the transformative system change framework (Foster-Fishman et al., 2007) and previous implementation studies (Kester & Mann, 2008; Terry, 2010). Participants reported the need to better understand the legislation itself, such as clarification about the term bullying, and the need for training and guidance related to school interventions. These findings suggest that training of school personnel can consider two major focal points. The first is policy focused, and involves explaining legal requirements, particularly in conducting bullying investigations, and understanding the legal definition of the word bullying. The second focal point involves providing training on specific evidence-based interventions. In 2011, 25 states had anti-bullying laws requiring schools to engage school personnel in training (Stuart-Cassel et al., 2011). Findings in this study support this practice.

Social Resources

Social resources, or being connected with other entities (e.g., schools, school districts, community organizations, department of education) or stakeholders (e.g., parents), served as an implementation facilitator. Schools were faced with resource challenges (e.g., lack of funding, staff), and these

interdependencies compensated. Recent work has shown that in the context of funding limitations schools collaborated by sharing costs, which enabled school-wide bullying awareness assemblies to take place (EMT Associates, 2013). Thus, through collaboration, schools are able to collectively garner resources to bring about a specific goal. These interconnections are consistent with the notion of bridging, which refers to connections developed across institutions that function as a form of social capital (Perkins, Hughey, & Speer, 2002). Bridging appears to have allowed for connections to be established with other schools, districts, and community agencies, which facilitated information and other resource exchanges. However, it is unclear if bridging occurs as an extra-individual process in which organizations are connected, which then fosters individual relationships, or if this process reflects efforts by individuals who then enable organizations to be connected (Perkins et al., 2002). Future research should explore the conditions that bring forth these interdependencies, and examine how schools and districts adapt and garner resources.

System-practices

A wide-range of practices and interventions were implemented across schools, which served as a facilitator to improving school climate. While this finding is intuitive, it is noteworthy that some of the interventions lacked an evidence-base (Bradshaw, 2015; Cornell & Limber, 2015). For example, peer-mediation was reported as a school intervention to reduce bullying. However research shows that peer mediation is less effective with bullying (Bradshaw, 2015). This resonates with the previously discussed barrier regarding the law's

lack of legislated evidence-based interventions. Practices lacking empirical support may be more likely to be used by schools when there is less legislative guidance regarding effective interventions. More consideration should be afforded to how state anti-bullying policies promote the use of empirically-based interventions.

System Operations

Finally, system operations refers to power relations within the system, and this study found school leadership (e.g. principals) as gatekeepers to implementation efforts. The importance of school leaders has been widely documented (e.g., Crepeau-Hobson & Sobel, 2010; Forman et al., 2009; Marrs & Little, 2014), and this study extends this finding to the implementation of state anti-bullying laws. Previous work has considered principals' engagement and affective support, as opposed to their knowledge of an intervention, as a facilitator of implementation (Forman et al., 2009). Also, principals that have strong management skills can provide direction regarding implementation protocols (Forman, et al, 2009; Mars & Little, 2014).

The System Dynamics of System-level Parts

This investigation also identified how respective system parts are interconnected (see Figures 1 and 2), which signifies an important research contribution. Previous studies have primarily identified barriers or facilitators to implementation without illustrating these connections (Cross et al., 2011; EMT Associates, 2013; Terry, 2010). The integration of these system elements informs a more holistic understanding of the system and areas to target (Foster-Fishman et

al., 2007). Providing a comprehensive system-level framework also helps to identify positive and negative interactions and root causes to system-wide challenges (Foster-Fishman et al., 2007).

Identifying levers of change. Identifying levers of change refers to the identification of system parts that are fundamental to the system, and that can have a system-wide impact if they are targeted (Foster-Fishman et al., 2007). A significant finding in this study is that broader system-level barriers appear to be mediated or funneled through system economics (e.g., funding, staff). For example, competing policies, discussed earlier, indirectly affected school climate improvement by limiting school resources such as staff and staff time (Figure 2; relationship 6). As a result, school resources that are already deficient may be less likely to be devoted to school climate improvement activities.

Previous work has identified the importance of resources (Kester & Mann, 2008). This study contextualizes these previous findings by showing how distal factors (e.g., competing policies) contribute to this challenge. Additionally, system-change is often depicted as unpredictable, chaotic, and non-linear (Foster-Fishman et al., 2007). While this conceptualization may be accurate, the proximity of resources such as funding and staff to implementation objectives (e.g., bullying investigations) suggests a certain level of predictability. Higgins (2004) contends that a strong theory is one that is coherent and parsimonious, which counters previous depictions of system-change theories as chaotic and unpredictable. Indeed, implementation studies seek to inform sustainability of practice, and this study depicts a framework that is more predictable as it

identifies how many system-level factors are linked and channeled through system economics (e.g., resources, funding, staff). Overall, the proximity of resources to implementation objectives suggests that future work will need to target these resources. This may be done by appropriating funding, or developing cost effective ways of pooling resources that enable interventions.

Social resources, such as the connections between schools and community organizations, appear to be one such method of pooling resources and enabling capacity. As reflected in Figures 1 and 2, these interdependencies serve as implementation facilitators by helping to offset the limitations brought forth due to lack of resources (e.g., Figure 2, relationship 3), and by mobilizing staff capacity such as skills and knowledge (i.e., Human Resources; Figures 1 and 2, relationships 1 and 2). These interconnections represent a 'cycling of resources', which assumes that there are many more resources within a setting that are available and can be utilized (Kelly, Ryan, Altman, & Stelzner, 2000, p. 137). According to Kelly's (2000) ecological principals, *adaptation* draws attention to ongoing transformation that occurs within systems, and how systems respond to external demands. The interconnections between schools, and between schools and community organizations, appear to be purposeful adaptations to the demands brought forth by PA 11-232. Yet, it is unclear if this pattern is typical within natural conditions or if schools would be less likely to cycle resources if these laws were adequately funded. Research should more closely examine the conditions that catalyze these interdependencies to inform how schools adapt and

respond to the demands of state anti-bullying laws. This understanding would inform bottom-up implementation strategies.

Reinforcing interactions. Foster-Fishman and colleagues (2007) identify two types of system interactions, namely *reinforcing interactions* and *balancing interactions*. Reinforcing interactions result in the escalation of an outcome, which creates a vicious cycle. For example, as seen in broken window theory, poor physical conditions in a neighborhood can contribute to norms of apathy, which then contributes to delinquency (Foster-Fishman et al., 2007). In turn, this cycle self-perpetuates as delinquency contributes to poor neighborhood conditions, and the cycle continues to escalate.

From the standpoint of reinforcing interactions it appears that, ironically, bullying investigations may counter the objective of school climate improvement. For example, bullying investigations usurp school resources, such as staff, staff time, and funding (Figure 1, relationship 14), and these are the same resources needed to effectively implement school interventions to improve school climate (Figure 2, relationship 21) (e.g., Forman et al., 2009). As school staff members focus on legally required bullying investigations, staff time, attention, and energy that could be directed toward prevention efforts, such as enhancing the social-emotional well-being of children, becomes limited. Ultimately, inability to focus on the broader school environment may result in more bullying incidents that need to be investigated, hence continuing a reinforcing cycle. This sheds light on the complexity of state anti-bullying policies, and how different policy objectives can have an inhibitory effect. However, it is important to note that these policies

do not necessarily need to conflict. Rather, in practice, it would be encouraged for bullying investigations to be conducted in a manner that can guide school climate improvement as opposed to being conducted with the sole intention of sanctioning students.

Balancing interactions. Finally, balancing interactions serve to stabilize a system (Foster-Fishman et al., 2007). Our findings revealed a series of balancing interactions and are evidenced by the implementation facilitators identified in Figures 1 and 2 (depicted by dotted lines). For example, and as discussed earlier, school-community interdependence (Figure 2, relationship 3) is a response to the lack of school resources such as staff and funding, and therefore helps to bring stability to the system. As another example, and as alluded to earlier, parents often used the word bullying liberally, whereas schools relied on a more conservative legal definition. Schools' reliance on a more conservative use of the word bullying has balancing implications as it prevents schools from being overwhelmed by a large volume of cases to investigate. Consequently, this can preserve school resources (e.g., staff, staff time).

As a final caveat, it is noteworthy that school climate improvement (Figure 2), as compared to bullying investigations (Figure 1) involves a broader cross-section of system parts. Additionally, other legislative components, such as establishing school climate committees and conducting school climate surveys, did not involve many system-change parts – typically only staff, time, and funding. School climate improvement appears to represent the legislative area that most reflects system-level change as it involves more system parts. This point

suggests some ways that can shape the discourse regarding the implementation of state anti-bullying legislation. First, it should not be assumed that all policy changes or requirements equate to systems change. Some policies call for a greater shift in the landscape of system parts than others. Second, a certain nomenclature is needed that distinguishes state anti-bullying policies that are more technical as opposed to policies that more closely approximate system-change (school climate improvement). One possibility is the designation of "technical" policies and "second-order policies", with the latter term suggesting policies that require the mobilization of a broader cross-section of system parts. Finally, policies requiring the most fundamental shift in the landscape of the system are likely to be more difficult to implement, but will bring forth the most notable contribution to school safety.

Future Directions and Implications for Research, Theory, and Practice

Implications for research. This investigation has implications for research. First, more research is needed that examines barriers and facilitators to implementation across different states with different policies. This would inform how specific barriers and facilitators are policy-specific. Second, research should examine implementation processes according to different units of analysis (e.g., state department of education, district level, school level), while simultaneously collecting data from varied stakeholders such as students, parents, school staff, state officials, and policymakers. In addition, ethnographic studies are needed that can provide a better understanding of the interactions between different school stakeholders (e.g., parents, school staff) and related power dynamics. In

particular, ethnographic investigations would be well-suited to better understand the interactions and processes that occur within bullying investigations as well as school climate committees.

Moreover, quantitative studies are also needed to move this body of research forward as only one study has tested the efficacy of state-level anti-bullying laws (Hatzenbuehler, Schwab-Reese, Ranapurwala, Hertz, & Ramirez, 2015). Similarly, quantitative studies are needed that test different models of implementation. For example, this study highlights different system-level factors that contribute to implementation, such as norms, resources (e.g., funding, staff, staff time), and school leadership. The extent to which these factors contribute to implementation is unclear and studies can examine if certain variables account for more variance. Structural equation modeling may be well suited to explore implementation processes by examining how certain variables directly or indirectly affect implementation. Finally, quantitative studies are needed that bridge the implementation-outcome gap and test how outcomes vary according to implementation fidelity.

Implications for theory. This study also has implications for theory. Foremost, this study represents a necessary first step in providing a comprehensive understanding of the various factors that contribute to the implementation of state-level anti-bullying laws. However, a strong theory is characterized by its parsimony (Higgins, 2004), and future work should focus on refining this framework by identifying areas that are more critical to implementation processes. From a theoretical standpoint, the issue of parsimony

may represent a limitation to system-level theories, as these frameworks are often very comprehensive. One possibility for future refinement is to focus on levers of change (discussed above), which represent areas in the theory that are more critical to system change efforts. Nevertheless, this investigation yields a comprehensive implementation framework that will inform future theory development.

Implications for practice. Finally, this study also has implications for practice. First, this study provides a comprehensive "blue print" that can guide school, district, and state efforts as these state-level anti-bullying policies are further amended. More specifically, state departments and districts can engage in a wide-range of activities to ensure the implementation of state-level anti-bullying policies. While a complete overview is beyond the scope of this study, there are some specific practices that are worth mentioning.

In regards to legislation, state anti-bullying laws can include a series of recommended evidence-based approaches to addressing bullying and improving school climate. However, compressive approaches that take into account various aspects of the school settings are most likely to be effective, and efforts should be made to encourage schools to adopt comprehensive strategies as opposed to relying on single interventions. Further, state departments are encouraged to develop and provide guiding materials that clarify key aspects of the law. In this study, school districts developed materials such as manuals and checklists, which helped to facilitate implementation processes. State departments can assist in the development of such materials or assist in their dissemination.

At a district or inter-district level, state departments can establish an infrastructure that provides greater capacity to school districts by providing professional development support and advancing ways in which schools and districts can be more connected to one another. The latter would enable networking, communication, and that best practices are shared. Toward this end, state departments are encouraged to develop ways in which schools can become increasingly connected in order to share strategies. Some possibilities include the use of media such as the development a website, blog, or listserv that would enable school climate coordinators and specialists to raise challenges and solicit feedback. In addition, states are encouraged to establish regional or state-wide meetings, such as conferences, that would also allow schools and districts to network, become more informed, and share strategies. In conjunction, state departments should be deliberate in developing a professional development infrastructure that would train school climate coordinators, specialists, and other key stakeholders. This training should, at a minimum, include information about the law and keys aspects of the law (e.g., bullying investigations), translating these requirements into practice, and evidence-based approaches to mitigate bullying and improve school climate.

Finally, in light of the importance of resources (e.g., funding, staff), as evidenced in this study, policy makers and state departments must consider the importance of resources in regards to implementation. While appropriating funding can be difficult within state-level and national fiscal constraints, the importance of resources should not be undermined. Some possibilities for

garnering resources can include inter-district, or school-community collaborations in order to reduce costs. Thus, while increased funding to support implementation efforts can be beneficial, other ways of leveraging resources should be considered, especially within fiscal constraints.

Strengths and Limitations

Several limitations of this study should be noted. First, the perspectives of parents and students were not included because this study was designed to explore the perspectives of school climate coordinators and specialists. These additional perspectives could have yielded greater insight to specific challenges (e.g., use of the word bullying by parents). In fact, related to this point, it is noteworthy that students were rarely mentioned as playing a role in implementation efforts. Second, interviews with participants took place months after the Sandy Hook tragedy of December 2012, potentially generating history effects. For example, parents' overuse of the word bullying, may reflect heightened sensitivity to school safety. Third, selection bias may have been possible as it is not fully clear how individuals who decided to participate differed from those who did not. For instance, schools experiencing difficulty implementing these mandates may have been less likely to participate due to concerns regarding non-compliance.

Nevertheless, this study is strengthened by several factors. First, our sample included individuals from diverse settings, such as urban and suburban districts, as well as magnet, charter, and public schools. The diversity of these settings strengthens the validity of our findings as themes are not setting specific. Second, we collected data from individuals at both the school (school climate

specialists) and district level (school climate coordinators). Individuals at each level represent distinct roles, which suggests that themes in this study are not role-specific. Third, this study used a qualitative methodology, which incorporated semi-structured interviews as well as a state-wide survey, which provides a deeper understanding of implementation processes.

Conclusion

Bullying can have deleterious consequences, and is endemic within schools and among youth across the United. While the response to bullying has traditionally been at the school setting level, state anti-bullying legislation marks a new and promising response to this public health problem. Toward this end, it is laudable that all fifty states have now enacted some form of anti-bullying legislation. However, research is needed that can continue to guide the development of these policies, and their implementation, in order to ensure the well-being of all children.

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Appendix A

Instruments

BARRIERS AND ENABLERS TO THE IMPLEMENTATION OF CONNECTICUT'S ANTI-BULLYING LEGISLATION

INTERVIEW SCRIPT - DEPAUL UNIVERSITY (School Version)

As you know, the 2012-13 school year was the first school year in which new anti-bullying legislation went into effect across Connecticut school districts and schools. You are one of thirty individuals we are interviewing across the state to get a better idea of what this experience has been like. This interview is in no way assessing if your school or school district is compliant with these changes. We are simply trying to understand the experience at your school this past year (2012-13) in regards to Connecticut's new anti-bullying legislation. So I want you to feel as comfortable as possible. If you need me to repeat a question, please feel free to ask me to repeat it. There is no right or wrong answer to any of these questions, basically we just want you to be as honest as possible and share your thoughts.

[Note to interviewer: if participant mentions their own name, school name or district name during the interview, please remind them to speak in general language such as "my school". Also, if participant mentions the names of others, please inform them not to specifically mention names]

I. General Questions (5 minutes)

1. **This past year there were several changes that took place across Connecticut schools with regards to anti-bullying legislation. Can you tell me the main thing that comes to your mind this past year when you think about some of these changes** (keep brief)?

II. Investigation of Acts of Bullying: (10:00 section; 15:00 cumulative)

"Ok so now I am going to ask you some questions that are more specific"

2. **One of the <u>specific anti-bullying</u> changes that took place this year has to do with the <u>*investigation of acts of bullying in which the state identified specific individuals, procedures, and timeframes to investigate, report, and intervene in student bullying incidents.*</u> Can you tell me a little about how this affected people at your school? Such as students, teachers, principals, and parents?**

   -students

-teachers
-principals
-parents

3. **At your school, were you the person responsible for investigating acts of bullying?**

☐ Yes ☐ No

a. What have been some of the challenges or barriers with regards to these changes this past year?

- [Prompt] **Any others**?

- [Prompt] **How have these challenges been handled?** [if they describe specific events, ask – "you mentioned XXX how was this handled?"

4. **This past year, what have you seen as being some of the strengths or positive things associated with this part of the legislation - investigating acts of bullying** *(keep brief)?*

III. Safe School Climate Questions (10:00 section; 25:00 cumulative)

"Ok so now the questions are going to change a little and we're going to move away from the questions that have to do with investigating acts of bullying."

5. **So one of the other new anti-bullying changes this past year had to do with <u>the implementation of a school climate improvement plan</u>. The idea is for schools and school districts to not only target bullying directly, and to also address bullying by improving the <u>overall</u> school environment. Can you tell me about some of the things that have been put into place at your school in order to improve school climate?**

6. **What were some of the challenges or barriers with regard to improving school climate at your school?**
   - [Prompt] **Can you think of any others?**

   - [Prompt] **How have these challenges been handled?** [if they describe specific events, ask – "you mentioned XXX how was this handled?"

7. **This past year, what have you seen as being some of the strengths or positive things with regard to this part of the anti-bullying legislation –of developing a school climate improvement plan** *(keep brief)?*

8. **Earlier** [referring to question 5]**, you described some of the things that were done to improve school climate such as _____. Can you tell me a little about what this has meant for people at your school? Such as…**
   - Teachers?
   - Principals?
   - Parents?
   - Students?

Note: if in time crunch prioritize questions as follows: 10, 8, 11, (skip 9)

School Climate Committee (2:00 section; 27:00 cumulative)

9. **As a result of the new legislation, schools were also required to have a school climate committee, what were the challenges and benefits to having a school climate committee?**

   [Prompt: if they mention challenges only prompt for benefits, and vice versa]

School Climate Assessment (3:00 section; 30:00 cumulative)

10. **As a result of the new legislation, schools were also required to conduct school climate assessments to students, school staff, and teachers, what were some of the challenges and benefits to conducting school climate assessments?**

    [Prompt: if they mention challenges only prompt for benefits, and vice versa]

Final Questions (5:00 section; 35:00 cumulative)

11. **So throughout this interview we discussed many changes this past year, can you tell me about any factors that you felt were helpful in carrying out these new changes? And when I say this it can be people, resources, time, funding, or anything else that you think was helpful in carrying out these changes** *[NOTE: if they begin to focus on negative things, let them speak, but then try to steer them back to the question]*

[Note: these next questions can be skipped it time becomes an issue]

Simply ask these final questions (WILL BE BRIEF)

12. **If these anti-bullying changes never took place this past year, how would have things been different at your school district?**

13. **So before we end, is there any recommendation you would like to make based on your experience this past year with regard to anything we discussed?**

14. **Ok, any last thoughts or comments?**

BARRIERS AND ENABLERS TO THE IMPLEMENTATION OF CONNECTICUT'S ANTI-BULLYING LEGISLATION

INTERVIEW SCRIPT - DEPAUL UNIVERSITY (District Version)

As you know, the 2012-13 school year was the first school year in which new anti-bullying legislation went into effect across Connecticut school districts and schools. You are one of **thirty individuals** we are interviewing across the state to get a better idea of what this experience has been like. This interview is not assessing if your school or school district is **compliant** with these changes. We are simply trying to understand the **experience** at your school or school district this past year (2012-13) in regards to Connecticut's new anti-bullying legislation. So I want you to feel as **comfortable** as possible. If you need me to repeat a question, please feel free to ask me to repeat it. There is **no right or wrong answer** to any of these questions, basically we just want you to be as honest as possible and share your thoughts.

[Note to interviewer: if participant mentions their own name, school name or district name during the interview, please remind them to speak in general language such as "my school". Also, if participant mentions the names of others, please inform them not to specifically mention names]

I. General Questions (5)

1. This past year there were several changes that took place across Connecticut schools with regards to anti-bullying legislation. Can you tell me the main thing that comes to your mind this past year when you think about some of these changes (keep brief)?

II. Investigation of Acts of Bullying: (10 section; 15 cumulative)

"Ok so now I am going to ask you some questions that are more specific"

2. **One of the specific anti-bullying changes that took place this year has to do with the *investigation of acts of bullying in which the state of Connecticut identified specific individuals, procedures, and timeframes to investigate and intervene in student bullying incidents.* Can you tell me a little about what this has meant for people at your school district such as students, teachers, principals, and parents?**
   - **-students**
   - **-teachers**
   - **-principals**
   - **-parents**

4. What have been some of the challenges or barriers in regards to these changes this past year?

- [Prompt] **Any others**?

- [Prompt] **How have these challenges been handled?** [if they describe specific events, ask – "you mentioned XXX how was this handled?"

3. **This past year what have you seen as being some of the strengths or positive things associated with this part of the legislation - investigating acts of bullying** *[Keep brief]?*

III. Safe School Climate Questions (10:00 section; 25:00 cumulative)

"Ok so now the questions are going to change a little and we're going to move away from the questions that have to do with investigating acts of bullying."

4. **So one of the other new anti-bullying changes this past year had to do with the implementation of a school climate improvement plan. The idea is for schools and school districts to not only target bullying directly, but to also address bullying by improving the overall school environment. Can**

you tell me about some of the things that have been put into place at your school district in order to improve school climate?

5. **What were some of the challenges or barriers with regard to improving school climate at your school district?**

   - [Prompt] **Can you think of any others?**

   - [Prompt] **How have these challenges been handled?** [if they describe specific events, ask – "you mentioned XXX how was this handled?"

6. **This past year, what have you seen as being some of the strengths or positive things with regard to this part of the anti-bullying legislation - of developing a school climate improvement plan ?** [Keep Brief]

7. **Earlier** [refers to question 4]**, you described some of the things that were done to improve school climate such as _____. Can you tell me a little about what this has meant for people at your school district? Such as…**
   - Teachers?
   - Principals?
   - Parents?
   - Students?

   Note: If in time crunch prioritize questions as follows: 10, 8, 11, (skip 9)

School Climate Committee (2 minutes section; 27:00 cumulative)

8. **As a result of the new legislation, schools were also required to have a school climate committee, what were the challenges and benefits to having a school climate committee?**

   [Prompt: if they mention challenges only prompt for benefits, and vice versa]

School Climate Assessment: (3 minutes section; 30:00 cumulative)

9. **As a result of the new legislation, schools were also required to conduct school climate assessments to students, school staff, and teachers, what were some of the challenges and benefits to conducting school climate assessments?**

[Prompt: if they mention challenges only prompt for benefits, and vice versa]

Final Questions (5 minutes section; 35:00 cumulative)

10. **So throughout this interview we discussed many changes this past year, can you tell me about any factors that you felt were helpful or supportive in carrying out these new changes? And when I say this it can be people, resources, time, funding, or anything else that you think was helpful in carrying out these changes** *[NOTE: if they begin to focus on negative things, let them speak, but then try to steer them back to the question]*

[Note: these next questions can be skipped it time becomes an issue]

Simply as these finals questions (WILL BE BRIEF)

11. **If these anti-bullying changes never took place this past year, how would have things been different at your school district?**

12. **So before we end, is there any recommendation you would like to make based on your experience this past year with regard to anything we discussed?**

13. **Ok, any last thoughts or comments?**

The following survey includes questions about the school climate survey that was administered during the 2012-13 school year.

I. GENERAL INFORMATION

1. **What is the name of the person filling out this survey?**

Email:

Please include phone number : (work) (cell)

2. **What is the name of the school climate specialist for this school (*only fill out if different from question 1*)?**

Email:

Please include phone number : (work) (cell)

3. **Please enter the name of the school for which you are reporting.**

4. **Please enter the name of the school district (e.g. city, town, or municipality) in which this school is located.**

5. **Please select the choice that best describes this school for which you are reporting.**
   - o Public School
   - o Magnet School
   - o Charter School
   - o Other: *If other, please specify in the space below*.

6. **Please select all school grade levels at this school. Select all that apply.**

	Kindergarten	1	2	3	4	5	6	7	8	9	10	11

II. SCHOOL CLIMATE ASSESSMENT QUESTIONS

These next questions have to do with the school climate assessment that was conducted at this school. Please read these questions carefully.

7. **In what month(s) was the school climate survey administered at this school?**

Select all that apply:

o August	o February
o September	o March
o October	o April
o November	o May
o December	o June
o January	o July
	o Other) Please Specify

8. **Which School Climate Assessment was administered at this school?**

o We administered the School Climate Survey Developed by the State of CT

o We administered a different survey [*not the CT school climate survey*] at this school?
Please specify the name of this survey in the space below.

o *We administered both,* the Connecticut School Climate Survey and another school climate survey. *If a different survey was used, please specify the name of this survey in the space below.*

If a survey was used at this school that is different from the Connecticut School

Climate Survey, please list the name of this survey in this space.

9. Please select all grade levels who received this school climate survey.

	Kindergarten	1	2	3	4	5	6	7	8	9	10	11	12
The Connecticut School Climate Survey	○	○	○	○	○	○	○	○	○	○	○	○	○
Other School Climate Survey	○	○	○	○	○	○	○	○	○	○	○	○	○

10. Please select all individuals at this school who received this school climate survey.

	Students	Parents	Teachers/Staff	Other
The Connecticut School Climate Survey	○	○	○	○
Other School Climate Survey	○	○	○	○

III. YOUR FEEDBACK

For these last few questions we are interested in your feedback.

11. This is the first school year in which all schools across Connecticut administered a school climate survey. Please tell us about your experience while administering these surveys. This information will help us provide better support to schools. Please comment below on all three surveys, as applicable (student surveys, parent surveys, and Teacher/Staff Surveys)

a. <u>Student Survey:</u> Please tell us about any challenges you experienced in administering the school climate survey to students.

b. <u>Parent Survey:</u> Please tell us about any challenges you experienced in administering the school climate survey to parents.

c. <u>Teacher/Staff Surveys</u>: Please tell us about any challenges you

experienced in administering the school climate survey to teachers/staff.

12. **Based on the school climate survey results for this school, <u>what are some of this school's strengths</u>?**

Student Surveys(s)

Parent Surveys(s)

Teacher Surveys(s)

13. **Based on the school climate survey results for this school, <u>what are some areas for improvement</u> at this school?**

Student Surveys(s)

Parent Surveys(s)

Teacher Surveys(s)

14. **Based on the school climate survey results for this school, please tell us how this school plans to use this information to guide school decisions or school interventions in the current or next academic year.**

Student Surveys(s)

Parent Surveys(s)

Teacher Surveys(s)

Thank you for your time!

Appendix B

PA 11-232

Substitute Senate Bill No. 1138

Public Act No. 11-232

AN ACT CONCERNING THE STRENGTHENING OF SCHOOL BULLYING LAWS.

Be it enacted by the Senate and House of Representatives in General Assembly convened:

Section 1. Section 10-222d of the general statutes is repealed and the following is substituted in lieu thereof (Effective July 1, 2011): (a) As used in this section and sections 10-222g, as amended by this act, 10-222h, as amended by this act, and sections 4 and 9 of this act: (1) "Bullying" means (A) the repeated use by one or more students of a written, oral or electronic communication, such as cyberbullying, directed at or referring to another student attending school in the same school district, or (B) a physical act or gesture by one or more students repeatedly directed at another student attending school in the same school district, that: (i) Causes physical or emotional harm to such student or damage to such student's property, (ii) places such student in reasonable fear of harm to himself or herself, or of damage to his or her property, (iii) creates a hostile environment at school for such student, (iv) infringes on the rights of such student at school, or (v) substantially disrupts the education process or the orderly operation of a school. Bullying shall include, but not be limited to, a written, oral or electronic communication or physical act or gesture based on any actual or perceived differentiating characteristic, such as race, color, religion, ancestry, national origin, gender, sexual orientation, gender identity or expression, socioeconomic status, academic status, physical appearance, or mental, physical, developmental or sensory disability, or by association with an individual or group who has or is perceived to have one or more of such characteristics; (2) "Cyberbullying" means any act of bullying through the use of the Internet, interactive and digital technologies, cellular mobile telephone or other mobile electronic devices or any electronic communications; (3) "Mobile electronic device" means any hand-held or other portable electronic equipment capable of providing data communication between two or more individuals, including, but not limited to, a text messaging device, a paging device, a personal digital assistant, a laptop computer, equipment that is capable of playing a video game or a digital video disk, or equipment on which digital images are taken or transmitted; (4) "Electronic communication" means any transfer of signs, signals, writing, images, sounds, data or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic, photoelectronic or photo-optical system; (5) "Hostile environment" means a situation in which bullying among students is

sufficiently severe or pervasive to alter the conditions of the school climate; (6) "Outside of the school setting" means at a location, activity or program that is not school related, or through the use of an electronic device or a mobile electronic device that is not owned, leased or used by a local or regional board of education; (7) "School employee" means (A) a teacher, substitute teacher, school administrator, school superintendent, guidance counselor, psychologist, social worker, nurse, physician, school paraprofessional or coach employed by a local or regional board of education or working in a public elementary, middle or high school; or (B) any other individual who, in the performance of his or her duties, has regular contact with students and who provides services to or on behalf of students enrolled in a public elementary, middle or high school, pursuant to a contract with the local or regional board of education; and (8) "School climate" means the quality and character of school life with a particular focus on the quality of the relationships within the school community between and among students and adults. (b) Each local and regional board of education shall develop and implement a [policy] safe school climate plan to address the existence of bullying in its schools. Such [policy] plan shall: (1) Enable students to anonymously report acts of bullying to [teachers and school administrators] school employees and require students and the parents or guardians of students to be notified annually of the process by which [they] students may make such reports, (2) enable the parents or guardians of students to file written reports of suspected bullying, (3) require [teachers and other school staff] school employees who witness acts of bullying or receive [student] reports of bullying to orally notify [school administrators in writing] the safe school climate specialist, described in section 9 of this act, or another school administrator if the safe school climate specialist is unavailable, not later than one school day after such school employee witnesses or receives a report of bullying, and to file a written report not later than two school days after making such oral report, (4) require [school administrators to investigate any] the safe school climate specialist to investigate or supervise the investigation of all reports of bullying and ensure that such investigation is completed promptly after receipt of any written reports made under this section, [and] (5) require the safe school climate specialist to review any anonymous reports, except that no disciplinary action shall be taken solely on the basis of an anonymous report, [(5)] (6) include a prevention and intervention strategy, as defined by section 10-222g, as amended by this act, for school [staff] employees to deal with bullying, [(6)] (7) provide for the inclusion of language in student codes of conduct concerning bullying, [(7)] (8) require each school to notify the parents or guardians of students who commit any verified acts of bullying and the parents or guardians of students against whom such acts were directed [, and invite them to attend at least one meeting, (8) require each school] not later than forty-eight hours after the completion of the investigation described in subdivision (4) of this subsection, (9) require each school to invite the parents or guardians of a student who commits any verified act of bullying and the parents or guardians of the

student against whom such act was directed to a meeting to communicate to such parents or guardians the measures being taken by the school to ensure the safety of the student against whom such act was directed and to prevent further acts of bullying, (10) establish a procedure for each school to document and maintain records relating to reports and investigations of bullying in such school and to maintain a list of the number of verified acts of bullying in such school and make such list available for public inspection, and [, within available appropriations,] annually report such number to the Department of Education, [annually] and in such manner as prescribed by the Commissioner of Education, [(9)] (11) direct the development of case-by-case interventions for addressing repeated incidents of bullying against a single individual or recurrently perpetrated bullying incidents by the same individual that may include both counseling and discipline, [and (10) identify the appropriate school personnel, which may include, but shall not be limited to, pupil services personnel, responsible for taking a bullying report and investigating the complaint] (12) prohibit discrimination and retaliation against an individual who reports or assists in the investigation of an act of bullying, (13) direct the development of student safety support plans for students against whom an act of bullying was directed that address safety measures the school will take to protect such students against further acts of bullying, (14) require the principal of a school, or the principal's designee, to notify the appropriate local law enforcement agency when such principal, or the principal's designee, believes that any acts of bullying constitute criminal conduct, (15) prohibit bullying (A) on school grounds, at a school-sponsored or school-related activity, function or program whether on or off school grounds, at a school bus stop, on a school bus or other vehicle owned, leased or used by a local or regional board of education, or through the use of an electronic device or an electronic mobile device owned, leased or used by the local or regional board of education, and (B) outside of the school setting if such bullying (i) creates a hostile environment at school for the student against whom such bullying was directed, (ii) infringes on the rights of the student against whom such bullying was directed at school, or (iii) substantially disrupts the education process or the orderly operation of a school, (16) require, at the beginning of each school year, each school to provide all school employees with a written or electronic copy of the school district's safe school climate plan, and (17) require that all school employees annually complete the training described in section 10-220a, as amended by this act, or section 6 of this act. The notification required pursuant to subdivision [(7)] (8) of this subsection and the invitation required pursuant to subdivision (9) of this [section] subsection shall include a description of the response of school [staff] employees to such acts and any consequences that may result from the commission of further acts of bullying. [For purposes of this section, "bullying" means any overt acts by a student or a group of students directed against another student with the intent to ridicule, harass, humiliate or intimidate the other student while on school grounds, at a school-sponsored activity or on a school bus, which acts are committed more than once against

any student during the school year. Such policies may include provisions addressing bullying outside of the school setting if it has a direct and negative impact on a student's academic performance or safety in school.] (c) Not later than [February 1, 2009] January 1, 2012, each local and regional board of education shall [submit the policy] approve the safe school climate plan developed pursuant to this section and submit such plan to the Department of Education. Not later than [July 1, 2009, each] thirty calendar days after approval of such plan by the local or regional board of education, the board shall make such plan available on the board's and each individual school in the school district's Internet web site and ensure that [the policy] such plan is included in the school district's publication of the rules, procedures and standards of conduct for schools and in all student handbooks. (d) On and after July 1, 2012, and biennially thereafter, each local and regional board of education shall require each school in the district to complete an assessment using the school climate assessment instruments, including surveys, approved and disseminated by the Department of Education pursuant to section 10-222h, as amended by this act. Each local and regional board of education shall collect the school climate assessments for each school in the district and submit such school climate assessments to the department.

Sec. 2. Section 10-222g of the general statutes is repealed and the following is substituted in lieu thereof (Effective July 1, 2011): For the purposes of section 10-222d, as amended by this act, the term "prevention and intervention strategy" may include, but is not limited to, (1) implementation of a positive behavioral interventions and supports process or another evidence-based model approach for safe school climate or for the prevention of bullying identified by the Department of Education, (2) [a school survey to determine the prevalence of bullying, (3) establishment of a bullying prevention coordinating committee with broad representation to review the survey results and implement the strategy, (4)] school rules prohibiting bullying, harassment and intimidation and establishing appropriate consequences for those who engage in such acts, [(5)] (3) adequate adult supervision of outdoor areas, hallways, the lunchroom and other specific areas where bullying is likely to occur, [(6)] (4) inclusion of grade-appropriate bullying education and prevention curricula in kindergarten through high school, [(7)] (5) individual interventions with the bully, parents and school [staff] employees, and interventions with the bullied child, parents and school [staff] employees, [(8)] (6) school-wide training related to safe school climate, (7) student peer training, education and support, and [(9)] (8) promotion of parent involvement in bullying prevention through individual or team participation in meetings, trainings and individual interventions.

Sec. 3. Section 10-222h of the general statutes is repealed and the following is substituted in lieu thereof (Effective July 1, 2011): (a) The Department of Education shall, within available appropriations, (1) [review and analyze the policies submitted to the department pursuant to section 10-222d, (2) examine the relationship between bullying, school climate and student outcomes, (3)] document school districts' articulated needs for technical assistance and training related to safe learning and bullying, [(4)] (2) collect information on the prevention and intervention strategies used by schools to reduce the incidence of bullying, improve school climate and improve reporting outcomes, [and (5)] (3) develop or recommend a model [policies] safe school climate plan for grades kindergarten to twelve, inclusive, [for the prevention of bullying] and (4) in collaboration with the Connecticut Association of Schools, disseminate to all public schools grade-level appropriate school climate assessment instruments approved by the department, including surveys, to be used by local and regional boards of education for the purposes of collecting information described in subdivision (2) of this subsection so that the department can monitor bullying prevention efforts over time and compare each district's progress to state trends. On or before February 1, 2010, and biennially thereafter, the department shall, in accordance with the provisions of section 11-4a, submit a report on the status of its efforts pursuant to this section including, but not limited to, the number of verified acts of bullying in the state, an analysis of the responsive action taken by school districts and any recommendations it may have regarding additional activities or funding to prevent bullying in schools and improve school climate to the joint standing committee of the General Assembly having cognizance of matters relating to education and to the select committee of the General Assembly having cognizance of matters relating to children. (b) The department may accept private donations for the purposes of this section.

Sec. 4. (NEW) (Effective July 1, 2011) (a) The Department of Education, in consultation with the State Education Resource Center, the Governor's Prevention Partnership and the Commission on Children, shall establish, within available appropriations, a state-wide safe school climate resource network for the identification, prevention and education of school bullying in the state. Such state-wide safe school climate resource network shall make available to all schools information, training opportunities and resource materials to improve the school climate to diminish bullying. (b) The department may seek federal, state and municipal funding and may accept private donations for the administration of the statewide safe school climate resource network.

Sec. 5. Subsection (a) of section 10-220a of the general statutes is repealed and the following is substituted in lieu thereof (Effective July 1, 2011): (a) Each local or regional board of education shall provide an inservice training program for its teachers, administrators and pupil personnel who hold the initial educator, provisional educator or professional educator certificate. Such program shall provide such teachers, administrators and pupil personnel with information on (1) the nature and the relationship of drugs, as defined in subdivision (17) of section 21a-240, and alcohol to health and personality development, and procedures for discouraging their abuse, (2) health and mental health risk reduction education which includes, but need not be limited to, the prevention of risk-taking behavior by children and the relationship of such behavior to substance abuse, pregnancy, sexually transmitted diseases, including HIV-infection and AIDS, as defined in section 19a-581, violence, teen dating violence, domestic violence, child abuse and youth suicide, (3) the growth and development of exceptional children, including handicapped and gifted and talented children and children who may require special education, including, but not limited to, children with attention-deficit hyperactivity disorder or learning disabilities, and methods for identifying, planning for and working effectively with special needs children in a regular classroom, (4) school violence prevention, conflict resolution, the prevention of and response to youth suicide and the identification and prevention of and response to bullying, as defined in subsection (a) of section 10-222d, as amended by this act, except that those boards of education that implement [an] any evidence-based model approach [,] that is approved by the Department of Education and is consistent with subsection (d) of section 10-145a, as amended by this act, subsection (a) of section 10-220a, as amended by this act, sections 10- 222d, as amended by this act, 10-222g, as amended by this act, and 10-222h, as amended by this act, subsection (g) of section 10-233c and sections 1 and 3 of public act 08-160, shall not be required to provide in-service training on the identification and prevention of and response to bullying, (5) cardiopulmonary resuscitation and other emergency life saving procedures, (6) computer and other information technology as applied to student learning and classroom instruction, communications and data management, (7) the teaching of the language arts, reading and reading readiness for teachers in grades kindergarten to three, inclusive, and (8) second language acquisition in districts required to provide a program of bilingual education pursuant to section 10-17f. Each local and regional board of education may allow any paraprofessional or noncertified employee to participate, on a

voluntary basis, in any in-service training program provided pursuant to this section. The State Board of Education, within available appropriations and utilizing available materials, shall assist and encourage local and regional boards of education to include: (A) Holocaust education and awareness; (B) the historical events surrounding the Great Famine in Ireland; (C) African-American history; (D) Puerto Rican history; (E) Native American history; (F) personal financial management; (G) domestic violence and teen dating violence; and (H) topics approved by the state board upon the request of local or regional boards of education as part of in-service training programs pursuant to this subsection.

Sec. 6. (NEW) (Effective July 1, 2011) The Department of Education shall provide, within available appropriations, annual training to school employees, as defined in section 10-222d of the general statutes, as amended by this act, except those school employees who hold the initial educator, provisional educator or professional educator certificate, on the prevention, identification and response to school bullying, as defined in section 10-222d of the general statutes, as amended by this act, and the prevention of and response to youth suicide. Such training may include, but not be limited to, (1) developmentally appropriate strategies to prevent bullying among students in school and outside of the school setting, (2) developmentally appropriate strategies for immediate and effective interventions to stop bullying, (3) information regarding the interaction and relationship between students committing acts of bullying, students against whom such acts of bullying are directed and witnesses of such acts of bullying, (4) research findings on bullying, such as information about the types of students who have been shown to be at-risk for bullying in the school setting, (5) information on the incidence and nature of cyberbullying, as defined in section 10-222d of the general statutes, as amended by this act, (6) Internet safety issues as they relate to cyberbullying, or (7) information on the incidence of youth suicide, methods of identifying youths at risk of suicide and developmentally appropriate strategies for effective interventions to prevent youth suicide. Such training may be presented in person by mentors, offered in state-wide workshops or through on-line courses.

Sec. 7. Subdivision (1) of subsection (e) of section 10-145o of the general statutes is repealed and the following is substituted in lieu thereof (Effective July 1, 2011):

(e) (1) Beginning teachers shall satisfactorily complete instructional modules in the following areas: (A) Classroom management and climate, which shall

include training regarding the prevention, identification and response to school bullying, as defined in section 10- 222d, as amended by this act, and the prevention of and response to youth suicide; (B) lesson planning and unit design; (C) delivering instruction; (D) assessing student learning; and (E) professional practice. Beginning teachers shall complete two modules in their first year in the program and three modules in their second year in the program, except as otherwise provided by the Commissioner of Education, or as provided for in subsection (h) of this section.

Sec. 8. Subsection (d) of section 10-145a of the general statutes is repealed and the following is substituted in lieu thereof (Effective July 1, 2011): (d) Any candidate in a program of teacher preparation leading to professional certification shall [be encouraged to] complete a school violence, bullying, as defined in section 10-222d, as amended by this act, and suicide prevention and conflict resolution component of such a program.

Sec. 9. (NEW) (Effective July 1, 2011) (a) For the school year commencing July 1, 2012, and each school year thereafter, the superintendent of each local or regional board of education shall appoint, from among existing school district staff, a district safe school climate coordinator. The district safe school climate coordinator shall: (1) Be responsible for implementing the district's safe school climate plan, developed pursuant to section 10-222d of the general statutes, as amended by this act, (2) collaborate with the safe school climate specialists, described in subsection (b) of this section, the board of education for the district and the superintendent of schools of the school district to prevent, identify and respond to bullying in the schools of the district, (3) provide data and information, in collaboration with the superintendent of schools of the district, to the Department of Education regarding bullying, in accordance with the provisions of subsection (b) of section 10-222d of the general statutes, as amended by this act, and subsection (a) of section 10-222h of the general statutes, as amended by this act, and (4) meet with the safe school climate specialists at least twice during the school year to discuss issues relating to bullying in the school district and to make recommendations concerning amendments to the district's safe school climate plan. (b) For the school year commencing July 1, 2012, and each school year thereafter, the principal of each school, or the principal's designee, shall serve as the safe school climate specialist and shall (1) investigate or supervise the investigation of reported acts of bullying in the school in accordance with the district's safe school climate plan, (2) collect and maintain records of reports and investigations of bullying in the school, and (3) act as the primary school

official responsible for preventing, identifying and responding to reports of bullying in the school. (c) (1) For the school year commencing July 1, 2012, and each school year thereafter, the principal of each school shall establish a committee or designate at least one existing committee in the school to be responsible for developing and fostering a safe school climate and addressing issues relating to bullying in the school. Such committee shall include at least one parent or guardian of a student enrolled in the school appointed by the school principal. (2) Any such committee shall: (A) receive copies of completed reports following investigations of bullying, (B) identify and address patterns of bullying among students in the school, (C) review and amend school policies relating to bullying, (D) review and make recommendations to the district safe school climate coordinator regarding the district's safe school climate plan based on issues and experiences specific to the school, (E) educate students, school employees and parents and guardians of students on issues relating to bullying, (F) collaborate with the district safe school climate coordinator in the collection of data regarding bullying, in accordance with the provisions of subsection (b) of section 10-222d of the general statutes, as amended by this act, and subsection (a) of section 10-222h of the general statutes, as amended by this act, and (G) perform any other duties as determined by the school principal that are related to the prevention, identification and response to school bullying for the school. (3) Any parent or guardian serving as a member of any such committee shall not participate in the activities described in subparagraphs (A) and (B) of subdivision (2) of this subsection or any other activity that may compromise the confidentiality of a student.

Sec. 10. (NEW) (Effective July 1, 2011) (a) No claim for damages shall be made against a school employee, as defined in section 10-222d of the general statutes, as amended by this act, who reports, investigates and responds to bullying, as defined in said section 10-222d, in accordance with the provisions of the safe school climate plan, described in said section 10-222d, if such school employee was acting in good faith in the discharge of his or her duties or within the scope of his or her employment. The immunity provided in this subsection does not apply to acts or omissions constituting gross, reckless, wilful or wanton misconduct.(b) No claim for damages shall be made against a student, parent or guardian of a student or any other individual who reports an act of bullying to a school employee, in accordance with the provisions of the safe school climate plan described in said section 10-222d, if such individual was acting in good faith. The immunity provided in this subsection does not apply to acts or omissions constituting gross, reckless, wilful or

wanton misconduct. (c) No claim for damages shall be made against a local or regional board of education that implements the safe school climate plan, described in section 10-222d of the general statutes, as amended by this act, and reports, investigates and responds to bullying, as defined in said section 10-222d, if such local or regional board of education was acting in good faith in the discharge of its duties. The immunity provided in this subsection does not apply to acts or omissions constituting gross, reckless, wilful or wanton misconduct.