

ADDRESSING SOCIAL AGGRESSION IN STATE ANTI-BULLYING POLICIES

Deborah Temkin

Abstract:

Social aggression, or victimization using social exclusion, rumors, and body language, has been overlooked in state anti-bullying policies since the policy surge following the 1999 Columbine Massacres. Social aggression has been associated with social anxiety disorder, depression and suicide, and lowered academic achievement and involvement. An analysis of the definitions of bullying in current anti-bullying policies was conducted to explore inclusion of social aggression. Twenty-one states yielded no anti-bullying policy, nine failed to define bullying within a policy, and the remaining 20 states varied on definitions, but all did not include social aggression. Implications and explanations of this finding are then discussed.

Introduction

Imagine this scenario. A group of middle school girls are sitting at a table, gossiping about another girl who usually eats lunch with them. That girl comes over to the table and the girls ignore her, avoid eye contact with her, and slyly put a bag on an empty chair, preventing her from sitting down. The girl, defeated, is forced to walk away and eat alone. What has happened here? To many, this is just “girls being girls” (Brown & Gilligan, 1992). According to the literature, however, this behavior is called social aggression (Galen & Underwood, 1997), and is just as, if not more, destructive than physical and verbal forms of aggression (La Greca & Lopez, 1998; Walters & Inderbitzen, 1998; Craig 1998; Storch & Masia-Warner, 2004). While the exact definition of social aggression[2], and indeed the term used to identify the behavior[3], varies between researchers, generally, social aggression involves the covert use of a social network (e.g. manipulating friendships and social status) to cause harm to a victim. Behaviors such as social rejection or exclusion, negative facial and body expressions, and rumors or gossip, are included in this definition (Underwood, 2003). Many also add that, often, social aggression occurs in groups, and it is not always easily decipherable who is the main aggressor (Underwood, 2003).

Social aggression in childhood has been linked to several negative outcomes that last into adulthood, that are often not seen with more direct forms of bullying. For instance, victims of social aggression have been shown to suffer more from social anxiety disorder and score higher on social anxiety measures than the general public and victims of physical or verbal aggression (La Greca & Lopez, 1998). This social anxiety disorder additionally is shown to persist through adulthood (McCabe, Anthony, Summerfeldt, Liss & Swinson, 2003). The relation between social anxiety and social aggression victimization is particularly significant, because social anxiety can lead to withdraw from work, school, and peers, thereby causing distress in other aspects of sufferers’ lives (Kashdan & Herbert, 2001). Social anxiety disorder is also linked with depression and suicide (Francis, Last & Strauss, 1992). Further, children see social aggression as just as destructive as the physical and verbal forms (Crick, Bigbee, & Howes, 1996). Yet, because social aggression causes no physical injury, and typically is filtered through the social network, leaving no single attacker to punish, it is often disregarded in schools, even as attention to bullying has increased (Simmons, 2002).

While bullying has several definitions that vary by culture and context, perhaps the most accepted and most cited definition arises from Dan Olweus’ (1993) work with an anti-bullying program in Norway. Broadly, Olweus states that, “a student is being bullied or victimized when he or she is exposed, repeatedly and over time, to negative actions on the part of one or more other students” (pg. 9). This definition notes three aspects of bullying behavior that Olweus believes to be universal across all types of bullying:

- (1) that the behavior is not a one time occurrence, but rather is a succession of actions;
- (2) that bullying can be, and often is, a group action, and;
- (3) that there must be a power imbalance (whether physical or social position) between the bully and victim, and both must interpret the behavior as a “negative action.”

Olweus adds that negative actions are not limited to what is typically considered bullying (e.g. “with words...or by physical contact” pg. 9), but also mentions the behaviors associated with social aggression:

It is also possible to carry out negative actions without use of words or physical contact, such as by making faces or dirty gestures, intentionally excluding someone from a group, or refusing to comply with another person’s wishes (pg.

9).

Following the April 20, 1999 Columbine Massacres in Littleton CO, public attention towards the tangible effects of bullying dramatically increased. In 12 of the 15 school shootings (80%) that occurred in the 1990s, bullying, and specifically peer ostracism (a component of social aggression), was identified as a common factor for the shooters (Leary, Kowalski, Smith, & Phillips, 2003). Educators and policy-makers responded quickly, adopting anti-bullying policies at both the school and state levels (Limber and Small, 2003; NCES, 2007). The scope of most of these policies, at least in Limber and Small's 2003 analysis, is limited to defining bullying as physical aggression and verbal aggression, counter to Olweus' established definition. Attention, at least in the popular media of movies (e.g. Mean Girls, 2004), television talk shows (e.g. Dr. Phil and Oprah), and books, has slowly been drawn to social aggression following the initial bullying policy surge, as has attention to "cyber-bullying," or using the internet to target victims, which has been identified as a form of social aggression (Campbell, 2005).

Little is known, however, about how, if at all, social aggression is addressed in current state anti-bullying policies. As Limber and Small (2003) argue, examining state-level bullying policy is a significant view into how schools, teachers, and society as a whole view bullying: "state laws have been the primary legislative vehicle for announcing new initiatives designed to reduce bullying behavior" (pg. 446). Few studies have looked at the content of state anti-bullying policies, and no study has looked specifically at the inclusion or exclusion of social aggression from these policies. Limber and Small (2003) conducted an initial analysis of state policies following the Columbine massacre, focusing on the definitions of bullying, the requirements for school boards and districts to develop and maintain anti-bullying plans, requirements for staff training in bullying issues, issues relating to reporting and liability, procedures for disciplining bullies, and procedures for protecting victims. They identified fifteen states with any form of anti-bullying policy, and identified four policies that encapsulated the "ideal" components of successful anti-bullying policy. Only nine of the fifteen states defined the behaviors associated with bullying, and within those policies, this definition varied greatly. While Limber and Small did not analyze inclusion of social aggression specifically, they do write that, "presumably, subtle or indirect forms of bullying (social isolation or exclusion) would not be included under [definitions only including physical parameters]" (pg. 447). Further, they argue that many definitions specify or imply that bullying occurs against a perceived characteristic (race, religion, sexual orientation, etc). According to Olweus (1993), this is not necessarily the case, and as such bullying which occurs when there is no such identifiable characteristic has the potential to be precluded from these definitions.

While Limber and Small's study provided a foundation for questioning whether policies address social aggression, it did not focus on this issue. Additionally, the research, conducted in 2002, does not represent more-recent additions and adaptations to state bullying policy; several additional states have added anti-bullying policies to state codes of education and many states examined in Limber and Small's analysis have changed or modified definitions and procedures within these codes.

A more recent analysis, self-published on the website "Bully Police USA," grades each state on its anti-bullying codes (High, 2007). These grades are based on a system of twelve points; for any state to receive an "A" they must accomplish at least nine of these guidelines. According to this analysis, seven states received "A's" for their policies, and an additional seven have received a grade of "A-." It is unclear what the distinction between an "A" and an "A-" is, however.

The website, while outlining each of the twelve points, provides little evidence supporting the necessity or validity of each criterion for a successful policy. While many of the criteria overlap with Limber and Small (e.g. defining bullying; recommendations for interventions, etc.), it is unclear from the site why certain criteria (e.g. "outlaw middle school/junior high") are even included in the scale. Additionally, there is no mention anywhere within the grading guidelines of what the ideal definition of bullying is (only that a definition of bullying should exist within the code) and, in the same vein, there is no mention of social aggression or the behaviors associated with it. Therefore, while this analysis provides interesting insight into policy strength, and on procedural analysis of those codes, it is not entirely applicable to the question at hand. However, the site remains the only current analysis of state anti-bullying policies and is even cited within the US Department of Education's anti-bullying course (Exploring the Nature and Prevention of Bullying, n.d.), giving it increased significance, despite obvious methodological limitations.

The following analysis does not involve ranking the states like High did, but rather, like Limber and Small, analyzes what the current trends are for anti-bullying policies, and specifically, how they define bullying. This analysis looks for exclusion of social aggression (i.e. if policy defines bullying as physical, verbal, or overt means of aggression), inclusion of social aggression (i.e. specifically mentioning social aggression behaviors or a related term such as emotional bullying, relational aggression, etc.), or flexibility in definitions for social aggression to be potentially included.

Methodology

A search of each state's 2006 code was conducted using the Academic Lexis-Nexis database to obtain state education codes relating to student behavior and school safety. Three searches were conducted for each state until a related document was

found; that is, if a relevant document was found after the first search for a particular state, no additional searches were conducted. The first search used the terms “bullying” and “education”; The second search used the terms “harassment” and “education”; And the third search used the terms “school safety” and “education.” Those states that had documents relating to this final search were later eliminated as these codes mainly addressed weapons and school lockdowns, not less-violent forms of student interaction. Documents for 26 states were retrieved under the first search (bullying). An additional three were found using the second search (harassment). Three states yielded recently passed amendments and bills relating to bullying, which had not been included in the 2006 code. These documents were included in the analysis. Seven states, which were later excluded, had codes for “school safety.”

Each document was then analyzed for its inclusion and/or exclusion of social aggression within the code. First, it was determined if the code defined bullying (or harassment; or intimidation) or gave indication of who should define the term. Next, the definition was examined for what types of aggression were covered by the definition (e.g. limited to physical, verbal, written, etc.) and whether social aggression fit within this definition. A summary of these findings can be found in Figure 1 below.

Figure 1



Definitions of Bullying

Of the 29 states with codes relating to bullying or harassment, nine did not give a stated definition of bullying. Seven of these states specified that the definition of “bullying” was to be made by the school board or school district. Two of these states, Arizona and California, provided no definition of bullying nor any specification of who should make the determination of what bullying constitutes.

The remaining 20 states each defined bullying slightly differently. Many of these policies repeated the same basic premises, but many either did not address one or more key components of the Olweus (2003) definition of bullying, or limited the definition of bullying so that many behaviors identified in the literature were not considered. Additionally, much of the language in all policies was up to interpretation; certain key words such as “gesture,” “injury” and even “overt” could potentially be flexible enough to imply components not explicitly stated. The definition of bullying in the literature has typically identified two main components of bullying: a power imbalance between victim and bully (either physical prowess or social standing) and harmful behavior that is persistent and pervasive and done with the intent to hurt, harm, or defile. These behaviors can include, but are not limited to, acts of physical aggression, written or verbal insults or teasing, online/electronic bullying (including abuse of sites such as MySpace and instant messaging), and social aggression (including social exclusion and rumor spreading).

Within state policies, however, several states chose not to include many of these behaviors or did not define what behaviors are included in the definition. Perhaps most limiting, three states chose to define bullying solely as physical aggression. For instance,

Missouri's recently passed amendment required each district in the state to adopt an anti-bullying policy by September, 2006, but limited the definition of bullying to mean:

Intimidation or harassment that causes a reasonable student to fear for his or her *physical* (emphasis added) safety or property. "Bullying" may consist of physical actions, including gestures, or oral or written communication, and any threat of retaliation for reporting of such acts. [2006 Mo. SB 894, 2006]

While the definition did include reference to "oral or written communication" it implied that these forms must represent a threat to physical safety; it does not recognize that they may be harmful in their own right.

Definition in the Georgia and Tennessee codes were even more explicit in limiting bullying to physical violence. Georgia's definition read:

The term "bullying means (1) any willful attempt or threat to inflict injury on another person, when accompanied by an apparent present ability to do so; or (2) any intentional display of force such as would give the victim reason to fear or expect immediate *bodily harm* (ea). [O.C.G.A. § 20-2-751.4, 2006]

Again, Georgia's definition is ambiguous; there is no specification as to whether "injury" must be physical or could additionally be emotional. However, the overall tone of Georgia's definition implies that bullying involves actual or threatened physical harm.

Unlike Georgia, Tennessee's explicitly addresses and limits itself to physical aggression:

Harassment, intimidation, or bullying means any act that substantially interferes with a student's educational benefits, opportunities or performance...that has the effect of (1) *physically* (ea) harming a student or damaging a student's property; (2) knowingly placing a student in reasonable fear of *physical* (ea) harm to the student or damage to the student's property; or (3) creating a *hostile* (ea) educational environment. [Tenn Code Ann. §49-6-1015, 2006]

Interestingly, the Tennessee, Georgia, and Missouri codes, in addition to limiting bullying to incidents or threats of physical violence, also did not mention the repeated nature of bullying. According to Olweus (1993), a fight is not bullying unless the victim has previously been the target of fights by the same bully. These codes seemed to imply that any fight, regardless of history, is defined as bullying.

Other codes moved beyond the physical aspects of bullying. Four states, Alaska, Rhode Island, Texas and Washington broadened the scope of bullying behaviors to include "verbal" and "written" acts, and Maryland defined bullying as "conduct, including verbal conduct." However, despite moving beyond defining bullying as only physical aggression, none of these five states includes social aggression specifically or by implication.

Seven states, on the other hand included the term "gesture" in their definitions of bullying. For instance, Oklahoma's definition reads:

Harassment, intimidation and bullying means any gesture, written or verbal expression, or physical act that a reasonable person should know will harm another student, damage another student's property...or insult or demean any student or group of students in such a way as to disrupt or interfere with...the education of any student. [70 Okl. St. § 24-100.3, 2005]

Here, the term gesture is not defined. According to Merriam and Webster, a gesture is "a movement usually of the body or limbs that expresses or emphasizes an idea, sentiment or attitude." Typically, an example of a gesture would be showing someone the middle finger in an attempt to emphasize that they are annoyed or angry with him or her. However, a gesture could also include moving one's backpack onto an empty seat at a lunch table to indicate that someone is not welcome to sit there. In this sense, then, including the term gesture could be used to incorporate socially aggressive behaviors into the definition. This is further supported by the inclusion of "insult or demean" in Oklahoma's code which stresses that injury from bullying can be both physical and emotional. New Jersey's definition also includes this caveat.

Two states, Indiana and Nevada, move beyond even defining bullying as specific forms of behaviors, further leaving room for the interpretation of social aggression within the definition. For example, Indiana's definition reads:

Bullying means overt, repeated acts or gestures including (1) verbal or written communications transmitted; (2) physical acts committed; or (3) *any other behavior* (ea) by a student or group of students against another student with the intent to harass, ridicule, humiliate, intimidate, or harm the other student. [Burns Ind. Code Ann. § 20-33-8-2, 2006]

While Indiana qualifies this definition with the term “overt,” its inclusion of the phrase “any other behavior” allows for inclusion of social aggression within this definition. Still, Indiana does not explicitly mention alternatively aggressive behaviors as it does verbal, written, and physical behaviors, and therefore school administrators adhering to this policy might still choose to ignore these behaviors.

Nevada’s definition, on the other hand, does not define any single form of behavior as bullying^[4], but rather as:

A willful act or course of conduct that is not otherwise authorized by law and is: (1) Highly offensive to a reasonable person; and (2) Intended to cause and actually causes another person to suffer serious *emotional distress* (ea). [Nev. Rev. Stat. Ann. § 388.125, 2006]

Here, the burden of interpreting this definition is left to school officials, but it certainly does not preclude alternatively aggressive behaviors from being included. Additionally, unlike most definitions, Nevada’s includes emotional bullying, fitting more with the established research definition of bullying and the outcomes for social aggression. However, because Nevada’s definition is so broad and so open to interpretation, many behaviors might still go unrecognized as fitting within this framework.

South Carolina’s definition is similar to Nevada’s in that it includes emotional harm as a form of bullying, but unlike Nevada, details behaviors included in bullying, and is counted among the states that include “gestures.” One of the most detailed definitions, South Carolina’s text reads:

Harassment, intimidation or bullying means a gesture an *electronic communication* (ea), or a written, verbal, physical, or sexual act that is reasonably perceived to have the effect of: (a) harming a student physically or *emotionally* (ea) or damaging a student’s property, or placing a student in reasonable fear of personal harm or property damage; or (b) insulting or demeaning a student or group of students causing substantial disruption in, or substantial interference with the orderly operation of the school. [2006 S.C. Acts 353]

One of the key distinguishers in this definition is the inclusion of “electronic communication.” Cyber-bullying has become increasingly linked with social aggression, as perpetrators can hide behind screen names. Two other states, Colorado and Idaho, also include specific prohibition to cyber-bullying.

No state, however, explicitly mentions behaviors associated with social aggression in its definition. While both Nevada and South Carolina provide enough flexibility and support for including social aggression through their inclusion of “emotional harm,” there is no guarantee schools will recognize social aggression under these definitions. Still, these two definitions are they only two which even have the remote possibility of including social aggression. It can therefore be concluded that the vast majority of policy makers either underestimate the scope of bullying (especially in the two states that limit bullying to only physical interaction) or simply do not see social aggression as part of bullying or an issue that needs to be addressed within official frameworks.

DISCUSSION AND CONCLUSIONS

It is clear that social aggression is not included, either implicitly or explicitly, in most state anti-bullying policies. While many states have added bullying policies and/or expanded the definitions within these policies since Limber and Small’s initial analysis, these definitions still, therefore, ignore many cases of bullying, as defined by Olweus. It is especially noteworthy that some states have so specifically defined bullying to physical harassment, that no interpretation of social aggression, verbal aggression, or electronic bullying is even possible. While the purposes of these codes vary by state, in most states these codes are equivalent to those on child abuse, in the sense that they require teachers to report incidents and protect victims. Still, this analysis has only addressed whether or not the language to include social aggression exists within the framework of these policies; it does not and cannot address whether or not these policies, regardless of their language, actually effectively combat or deter social aggression, or other forms of bullying, in schools. Without either comparative or longitudinal rates for differing policies, it is impossible to conclusively say that a state should have a policy that specifically mentions social aggression, leaves room for social aggression in its interpretation, or should even have anti-bullying policies at all.

Although social aggression has entered the popular media and has gained public attention, it has received little attention within

state educational policy. It is unclear what direct impact state anti-bullying policies have on day-to-day functioning in schools, but excluding social aggression from a state's official bullying definition has two potential disadvantages. First, it may risk conveying implicit support for teachers, administrators, and schools to ignore the behavior. Schools faced with parental or student claims of inaction for incidents of social aggression can point to the omission in the code and claim that such behaviors are not covered by the state's protection. Including social aggression in a definition, therefore, could potentially empower students, parents, and community members to demand that schools and teachers adhere to the state policy, thereby reducing the culture many schools have of seeing such behaviors as "girls being girls" (Simmons, 2002).

Second, limiting the definition of bullying to exclude social aggression may have the unintended consequence of invalidating the experience of the many victims, who report feeling alone in their experiences (see Simmons, 2002; 2004). Yet, social aggression is pervasive and recognized, at least in the psychological literature, as detrimental to victims as physical aggression (La Greca & Lopez, 1998; Walters & Inderbitzen, 1998). Acknowledging the issue in a systematic and public form could have the potential to increase awareness to the issue, decrease the normalcy associated with these harmful behaviors, and aid in the development of prevention and intervention strategies. Policies aimed at combating child abuse in the 1960s were able to accomplish each of these goals, but as Nelson (1984) addresses, the definition, which once disregarded emotional abuse, mattered in changing the perceptions of specific behaviors within the term.

This analysis of state anti-bullying policies, however, does not address the possibility that individual schools, or even individual classrooms, have already implemented policies or programs aimed at reducing social aggression. Few studies have actually examined anti-bullying policies in schools, and most focus on schools outside of the United States, many already having governmentally-mandated resolutions to address bullying. For instance, Woods & Wolke (2003) explored the content of school anti-bullying policies in the United Kingdom after an implicit requirement from the government for schools to address bullying in some capacity, but without giving a specific definition of bullying for schools to consider. They found that definitions of bullying, and strengths of bullying policies, varied between schools and most schools did not adequately address social aggression. Further, schools with strong bullying policies targeted towards reducing overt forms of aggression had a significant increase in social aggression (Woods & Wolke, 2003).

At the classroom or teacher level, studies have shown that teachers often do not know about, or simply ignore, bullying in their classrooms. Upwards of 20% of the cases reported to teachers receive no disciplinary or intervention action, and more cases still are simply unreported, for victims' fear of inaction by the teacher and subsequent retaliation by the aggressor (Rigby & Barnes, 2002). Research considering teachers' general attitudes or beliefs towards the different types of bullying additionally show a significant difference in beliefs about the harm of physical aggression versus social aggression, with social aggression receiving less attention than physical forms (Craig, Henderson, & Murphy, 2001; Nicolaidis, Toda & Smith, 2002; Yoon & Kerber, 2003). Thus, while some teachers might adequately address bullying on their own, it is clear that many would and do ignore cases of social aggression. Clearly, providing unambiguous and concise definitions in state anti-bullying policies, backed by the mandate that teachers must act to combat such incidents, might be the only way to increase the likelihood that teachers will act adequately to protect students from social aggression. Still, there remains little guidance in either the psychological or educational/pedagogical literature as to how best teachers should intervene in social aggression, and until validated strategies for addressing these behaviors are established, it might be difficult to enforce any such mandate.

There are also several additional concerns surrounding potential unforeseen consequences that could arise from the implementation of state anti-bullying policies in general as well as the integration of social aggression into such policies. Stein (2003) argues that expanding the definition of bullying—and by extension, harassment—to include behaviors such as verbal or social aggression, has two potentially detrimental side effects. First, expanding the definition of bullying to include social aggression could lead to overly restricting and controlling student behavior, choice, and expression. Some behaviors, such as those that fit within the realm of social or verbal aggression, might be hard to distinguish as normal child interactions or as bullying incidents, where the actions are repeated and the intent is perceived with negative intent by both actor and recipient. Citing Carol Tarvis (2002; as cited in Stein, 2003), Stein raises the question of how, in the culture of "one strike and you're out," zero-tolerance world, one could possibly regulate interactions that are potentially both prosocial and aggressive: can you ban certain groups of students from sitting together and not with others? Do you ban whispering between students? It is, truly, a nebulous road.

Second, state-level definitions of bullying, and especially broad definitions that include social aggression, could have the unintended effect of lessening school liability for as well as trivializing more serious behaviors such as physical or sexual assault. Stein points out that many of the behaviors schools identify as "bullying" may be in fact cases that would otherwise be labeled as criminal conduct, and thus worthy of more serious consequences and punishments than the label "bullying" might imply.

A key issue for policy makers is to determine whether the potential advantages of more inclusive definitions of bullying (challenging the norms of social aggression and validating the experiences of victims) are outweighed by the potential disadvantages (impinging on student expression and undermining the pursuit of more serious charges). It still remains, however,

that many students, upwards of 30% of all United States students (Nansel et al., 2001), are involved in bullying, and many victims therein would likely not be classified as victims of serious sexual or physical abuse. These victims, though perhaps not as traumatized as in these other interactions, are still victims all the same. If the aim of anti-bullying policies is to protect students from unnecessary harm, then all victims, no matter what the action, must be covered. It is clear, however, that Stein's and others' considerations for the potential misuse of anti-bullying policies must be addressed in some explicit manner, and research needs to establish how best to address social aggression at both the policy level and for individual teachers. It might just be that it is impractical to police social aggression from a state policy angle, but the impact of either including or not including it in such definitions needs to be empirically explored.

Though this analysis has focused on state-level anti-bullying policy, there have been several efforts in recent years, as well, to establish a federal anti-bullying policy and provide funding to develop and implement intervention and prevention programs on par to those already funded by the Safe and Drug-Free Schools and Communities Act (SDFSCA). While legislation in the United States House of Representatives has been proposed to add "bullying" to the issues addressed in the SCFSCA contained within the No Child Left Behind Act, no federal requirement for schools to formally address bullying is in place^[5] (see Temkin, submitted; H.R 3438, 2007). The proposed legislation's definition of bullying also does not include social aggression, or any inference thereof. Though a federal policy might be the ultimate goal, and perhaps the only way any uniformity in definitions between state policies could be achieved, most federal-level policies surrounding behavior control and regulation, such as legislation on child abuse, have only been enacted following pressure caused by differing, but country-wide, state-level policies (Pfohl, 1977). With almost half the country without policies and continuing disagreements as to what anti-bullying policies should contain or if they should exist at all, there is not yet enough consensus or research to address bullying from a federal level. Still, this, perhaps, should be the eventual goal.

The current definitions contained within anti-bullying policies reflect the general lack of research about social aggression, its implications, and the effect of anti-bullying policies as a whole. Social aggression is a serious and harmful behavior, and warrants attention in this arena. If not, many students may be left struggling, with little recourse. Several steps need to be taken, however, to understand the true impact of anti-bullying policies, including both their positive and negative consequences, and their best formulation. First, we must establish if policy translates into classroom practice—if state anti-bullying policies' definitions included social aggression, would classroom teachers actually intervene in those behaviors and change their beliefs about the impact? Second, we must evaluate the impact broad anti-bullying definitions might have on the treatment of more-serious acts of assaults and the general rights of students. Third, we must determine what the best accountability method is in order to ensure teachers, administrators, and other school personnel are actually following the state policy. And finally, we must understand better the underlying processes behind social aggression, and how best for teachers to both detect the behaviors and intervene in them. We must continue this research and remember that real children's social and academic lives are at stake.

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Maryland	Md. EDUCATION Code Ann. § 7-424 (2006)
Minnesota	Minn. Stat. § 121A.0695 (2005)
Missouri	2006 Mo. SB 894
Mississippi	Miss. Code Ann. § 37-11-55 (2006)
Nevada	Nev. Rev. Stat. Ann. § 388.125 (2006) ; Nev. Rev. Stat. Ann. § 388.132 (2006)
New Hampshire	RSA 193-F:3 (2006)
New Jersey	N.J. Stat. § 18A:37-14 (2006)
New York	NY CLS Educ § 2801-a (2006)
Oklahoma	70 Okl. St. § 24-100.3 (2005)
Oregon	ORS § 339.351 (2006)
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South Carolina	2006 S.C. Acts 353; 2005 S.C. H.B. 3573; 2005 S.C. R. 400
Tennessee	Tenn. Code Ann. § 49-6-1015 (2006)
Texas	Tex. Educ. Code § 25.0341 (2006)
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Virginia	Va. Code Ann. § 22.1-279.6 (2006)
Washington	Rev. Code Wash. (ARCW) § 28A.300.285 (2006)
West Virginia	W. Va. Code § 18-2C-2 (2006) ; W. Va. Code § 18-2C-3 (2006)

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[2]Social aggression, here, should not be confused with a general attitude of taking pleasure in pain, lack of compassion for the poor or the weak, and competitiveness as defined by Twemlow, Fonagy, & Sacco (2003). While an important concept, here social aggression is defined as a direct intention to cause a specific victim, or victims, harm through covert means.

[3]It is also referred to as relational aggression (Crick & Grotpeter, 1995), indirect aggression (Bjorkqvist, Lagerspetz, and Kaukiainen, 1992), or emotional bullying (Coloroso, 2003).

[4]Nevada's definition is actually for the term "harassment" and not for "bullying." However, the context of the code seems to equate harassment with bullying, and thus this definition is included as defining bullying.

[5]A bill to amend the Safe and Drug Free Schools and Communities Act was most recently introduced on August 8, 2007, after several other earlier versions, to the House of Representatives by Representative Sanchez of CA. The Bill was referred to the Subcommittee on Healthy Families and Communities, and has yet to be voted on by the full House (H.R. 3438).

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