

NORTH RIVER COLLABORATIVE BULLYING PREVENTION AND INTERVENTION PLAN

The following Bullying Prevention and Intervention Plan was created in response to the requirements under M.G.L. c.71 § 370. and is designed as a comprehensive approach to addressing bullying and cyberbullying. The North River Collaborative is committed to working with students, staff, families, and the community to prevent issues of violence.

I. LEADERSHIP

A. Plan Development

Through input from the following constituent members, the North River Collaborative (NRC) is committed to creating structures within its programs that promote supportive school environments to reduce barriers to learning. Input from the following members of the Collaborative community was sought in the development of this plan:

- Administrative Team
- Staff
- Parents
- Students
- Anti-bullying Committee

Input from these constituents was sought through committee meetings and planning sessions. A notice and public comment period was held before the Board of Directors adopted the plan.

The Program Coordinators are responsible for the implementation and oversight of this plan. Implementation of the plan will be in accordance with NRC Bullying Prevention and Intervention Time Frame.

B. Assessing Needs and Resources

It is the intention of NRC to enhance its capacity to prevent and respond to issues of bullying within the context of other healthy school climate initiatives. As part of this process NRC conducted the following:

The Administrative Team together with the Bullying Committee identified current programs in place throughout the organization that address the social and behavioral well-being of our students. Current programs identified include: CPI (Non Violent Crisis Intervention), North River School Health & Life Skills Curriculum, MARC K-5 Curriculum: Bullying & Cyber-bullying Prevention (adapted/modified to students' developmental levels), Social Thinking, and Social Stories by Carol Gray, A Superhero Social Thinking Curriculum (Madrigal & Winner); adapted/modified. By assessing the adequacy of current programs, staff are better equipped to identify resource gaps and supplement them with materials that are field-tested, age appropriate and user-friendly.

The Administrative Team will assess the effectiveness of these programs through the monitoring of bullying incident reporting data at regularly scheduled monthly Administrative

Team meetings. The Administrative Team will assess the outcomes of those incidents and develop/modify/critique the action plan as a result of these incidents to prevent reoccurrence.

In addition to the monitoring of bullying incident reporting data, all behavioral incident reports will be reviewed by the Program Coordinators to identify those behaviors that may be characteristic of bullying and follow up on those behaviors.

Program Coordinators and other identified individuals will receive training in issues around bullying that will promote a positive school climate. Following the training of specified staff, opportunities for professional development for all staff will be created to train in methods, curriculum, etc.

The intended outcome of the assessment aspect of this plan is to develop, revise, and/or implement policies and procedures to promote a positive school climate.

C. Planning and Oversight

If a report of alleged bullying occurs, in addition to the actions required to address the specific report itself (see p.7), the following actions will be taken:

- a. Using the NRC Incident Reporting Form, staff/student will report any incident to the Program Coordinator or to the Executive Director or designee.
- b. The Program Coordinator /Executive Director/designee will review the report and sign off indicating that he/she has seen the report.
- c. The Program Coordinators will track reported incidences with noted attention given to targets and aggressors.
- d. At monthly meetings, NRC Administrative Team will conduct an analysis of bullying incidents and their resulting outcomes as the incidents occur. During the review process consideration will be given to the need for action and prevention plans and/or supports that respond to the needs of targets and aggressors.
- e. NRC will provide staff training in positive school climate, bullying identification and prevention techniques. Information will be shared with all staff at the first staff meeting in September of each school year. Subsequent training will take place during staff meetings or classroom meetings.
- f. The Administrative Team, with input from trained staff, will continuously update age and ability appropriate curriculum as needed.

D. Priority Statements

The North River Collaborative (NRC) expects that all members of NRC community treat each other in a civil manner with respect for individual differences. NRC is committed to providing all students with a safe learning environment that is free from bullying and cyberbullying. This commitment is an integral part of our comprehensive efforts to promote learning, and to prevent and eliminate all forms of bullying and other harmful and disruptive behavior that can impede the learning process.

We at NRC understand that members of certain student groups such as gay/lesbian, bisexual, or transgender, homeless and our students with disabilities may be more vulnerable to becoming targets of bullying, harassment, or teasing in our own programs or in our host school environments. NRC will take steps to create a safe, supportive environment for vulnerable populations and provide its students with the skills, knowledge, and strategies to prevent or respond to bullying, harassment, or teasing.

NRC will not tolerate any unlawful or disruptive behavior, including any form of bullying, cyberbullying, or retaliation, in our school buildings, on school grounds, or in school related activities. We will promptly investigate all reports and complaints of bullying, cyberbullying, and retaliation, and take prompt action to end that behavior and restore the target's sense of safety. We will support this commitment in all aspects of our school community including curricula, instructional programs, staff development, school sponsored extracurricular activities/field trips, and parent or guardian involvement.

NRC Bullying and Intervention Plan is a comprehensive approach to addressing bullying and cyber bullying. NRC is committed to working with students, staff, families, law enforcement agencies, and the community to prevent issues of violence. In consultation with these constituencies, we have established this plan for preventing, intervening, and responding to incidents of bullying, cyber bullying and retaliation. The Program Coordinators are responsible for the implementation and oversight of the plan.

II. TRAINING and PROFESSIONAL DEVELOPMENT

This plan reflects the topics that must be included in professional development as required by the law.

A. Annual Staff Training

NRC will provide annual training on bullying prevention and intervention at the Opening of School staff meeting. This training will include, but not be limited to:

- Staff duties under this plan
- An overview of the steps that the Program Coordinator will follow upon receipt of a report of bullying or retaliation.
- An overview of the bullying prevention curricula used in NRC programs.

The Program Director/AED will train staff members hired after the start of the school year.

B. Ongoing professional development

Professional development will be offered to staff to build their skills to prevent, identify, and respond to bullying. This training will be site based and delivered through staff meetings and/or classroom meetings by selected, identified staff who received extensive training on the subject matter. The content of the trainings will include the following:

- Developmentally appropriate strategies to prevent bullying.
- Developmentally appropriate strategies for immediate, effective interventions to stop bullying incidents.
- Information regarding the complex interaction and power differential that can take place between and among an aggressor, target, and witnesses to bullying.
- Research findings on bullying, including information about specific categories of students who have been shown to be particularly at risk for bullying in the school environment.
- Information on the incidence and nature of cyber bullying; and
- Internet safety issues as they relate to cyberbullying.

Professional development will also address ways to prevent and respond to bullying or retaliation for students with disabilities that must be considered when developing students' IEPs, with particular focus on students with autism and students with developmental and/or mental disabilities which affect social skills development. As the program coordinators attend IEP Team meetings, it will be their responsibility, along with the Out of District Coordinators, to ensure the Team addresses this topic and changes are made to the IEP as appropriate and in accordance with input from the Team.

C. Written notice to staff

NRC will provide all staff with an annual written notice of the plan by publishing information about it in the NRC employee handbook and the NRS student handbook. The plan is also available on the NRC website.

III. ACCESS to RESOURCES and SERVICES

A key aspect of promoting positive school climates is ensuring that the underlying emotional needs of targets, aggressors, families and others are addressed. This plan describes the strategies for providing support and services necessary to meet these needs. If a student has been identified as a target or as an aggressor, the following supports will be made available.

A. Identifying Resources

North River Collaborative's educational programs offer support to students in a protected environment with small class sizes and a high teacher to student ratio. All staff is highly trained to work with students with disabilities. In addition to teaching and therapy staff, students at North River School have access to counseling either through counselors or social workers assigned to specific programs. Many students who attend NRC programs also receive services through private agencies outside of the Collaborative. Collaborative staff routinely works to solicit releases to directly communicate with outside providers. Should a student require

additional counseling or agency resources NRC staff will work closely with families to identify need, and to facilitate this process.

- NRC has an identified local agency and other resources for families of students which are available to staff through the Program Coordinators.
- Built into NRC programs are home visits, which may be conducted if parents need additional support/information.
- Program coordinators will work with families to identify needs and to make connections to outside agencies, either directly or through the sending school district.

B. Counseling and other services

As indicated above, counseling services will be made available for all students at NRC. Should behavioral incident reports or bullying incident reports indicate a need for further counseling supports, the Program Coordinators will make an immediate referral to one of the NRC counselors or other specialized staff, or to a public/private agency outside of the collaborative (see D. below). Additionally, positive behavioral support plans may be developed or modified based upon incident reporting through the intervention support of the program coordinator. It is at the discretion of the program coordinator, classroom staff, and counselors to develop a plan for involving, teaching parents relative to behaviors.

- Should acts of bullying occur, staff will identify common times students are together and will consider separating students if appropriate.
- The identified aggressor may receive increased adult supervision.
- Program coordinators/directors will refer students to counseling as appropriate.
- Counselors, along with Program Coordinators will work with families to identify an action plan with a built-in re-evaluation period.
- The need for a behavior management plan will be assessed and implemented as needed.
- If bullying behavior becomes a pattern, it will be addressed in the student's IEP.

C. Students with disabilities

As special education service providers, the North River Collaborative staff is sensitive to the needs of its students and families. Together with the Out of District Coordinators, Program Coordinators will direct the Team to consider the student's social skills and identify behaviors that effect the student's learning, the learning of others, and the student's ability to interact with others in positive ways.

During the evaluation process, the Team will gather data and information related to a student's social skills. That data will be used as a source for discussion of potential student support. During the implementation of the IEP, the Team may need to reconvene to review data and determine any changes to the IEP that need to be made.

D. Referral to outside services

When appropriate, NRC will refer students and/or family to outside services. The determination will be made on an individual basis and in consultation with the sending district.

IV. ACADEMIC and NON-ACADEMIC ACTIVITIES

- The Bullying Team will assess current instruction in each program on bullying prevention and integrate current practice with evidenced based curricula.
- In order for students to develop a greater awareness of their disability self-advocacy skills will be taught to all students at all levels

A. Specific bullying prevention approaches

Bullying prevention curricula will be informed by current research which, among other things, emphasizes the following approaches:

- using scripts and role plays to develop skills.
- empowering students to take action by knowing what to do when they witness other students engaged in acts of bullying or retaliation, including seeking adult assistance.
- helping students understand the dynamics of bullying and cyberbullying, including the underlying power imbalance.
- emphasizing cyber-safety, including safe and appropriate use of electronic communication technologies.
- enhancing students' skills for engaging in healthy relationships and respectful communications; and
- engaging students in a safe, supportive school environment that is respectful of diversity and difference.

Each year, classroom staff will instruct students in age appropriate and developmentally appropriate language to recognize bullying and to take the necessary steps to respond and report to such acts.

B. General teaching approaches that support bullying prevention efforts

The following approaches are integral to establishing a safe and supportive school environment. These underscore the importance of our bullying intervention and prevention initiatives:

- setting clear expectations for students and establishing school and classroom routines.
- creating safe school and classroom environments for all students, including for students with disabilities, lesbian, gay, bisexual, transgender students, and homeless students.
- using appropriate and positive responses and reinforcement, even when students require discipline.
- using positive behavioral supports.
- encouraging adults to develop positive relationships with students.
- modeling, teaching, and rewarding pro-social, healthy, and respectful behaviors.
- using positive approaches to behavioral health, including collaborative problem-solving, conflict resolution training, teamwork, and positive behavioral supports that aid in social and emotional development.

- using the Internet safely; and
- supporting students' interest and participation in non-academic and extracurricular activities, particularly in their areas of strength.

V. POLICIES and PROCEDURES for REPORTING and RESPONDING to BULLYING and RETALIATION

A. Reporting bullying or retaliation

1. Reporting by staff. A member of NRC or host school staff, including, but not limited to, an educator, administrator, school nurse, cafeteria worker, custodian, bus driver, athletic coach, advisor to an extracurricular activity or paraprofessional, shall immediately report any instance of bullying or retaliation she/he has witnessed or become aware of to the Program Coordinator or to the Executive director /designee when the principal/designee or Executive director/designee when the Coordinator is the alleged aggressor.

2. Reporting by students, parents or guardians, and others. The North River Collaborative expects students, parents/guardians, and others who witness or become aware of an instance of bullying or retaliation involving a student to report it to the program coordinator or designee. A staff member is required to report immediately to the coordinator or designee, or to the Executive director or designee when the coordinator is the alleged aggressor or to the NRC Board of Directors when the Executive Director is the alleged aggressor, any instance of bullying or retaliation the staff member becomes aware of or witnesses. An individual may make an anonymous report of bullying or retaliation; however, no disciplinary action may be taken against a student solely on the basis of an anonymous report. A student who knowingly makes a false accusation of bullying or retaliation shall be subject to disciplinary action.

B. Responding to a report of bullying or retaliation

1. Safety. As soon as an allegation of bullying or retaliation is received, while the investigation is underway, the program coordinator/director or designee will take steps to assess the need to restore a sense of safety to the alleged target and/or to protect the alleged target from possible further incidents. Responses to promote safety in situations of student-to-student bullying or retaliation may include, but not be limited to, creating a personal safety plan; pre-determining seating arrangements for the target and/or the aggressor in the classroom, at lunch, or on the bus; identifying a staff member who will act as a "safe person" for the target; and altering the aggressor's schedule and access to the target. Responses to promote safety in situations of staff-to-student bullying or retaliation may include, but not be limited to, creating a personal safety plan; moving the student out of the staff member's classroom; ensuring the student is not in the vicinity of the staff member such as lunch or on the bus; and identifying another staff member who will act as a "safe person" for the target. The program coordinator /director/ designee will take additional steps to promote safety during the course of and after the investigation, as necessary. Additionally, the program coordinator/director/ designee will implement appropriate strategies for protecting from bullying or retaliation a student who has reported bullying or retaliation, a student who has witnessed bullying or retaliation, a student who provides information during an investigation, or a student who has reliable information about a reported act of bullying or retaliation.

2. Obligations to notify others.

a. Notice to parents or guardians.

In situations of student-to-student bullying or retaliation, the program coordinator or designee will promptly notify the parent/guardian of the alleged target and the alleged aggressor once the investigation has determined that either bullying or retaliation has occurred. If the alleged target and alleged aggressor attend different schools, the program coordinator receiving the report shall inform the principal and/or Director of Special Education/designee of the other student's school and promptly notify the student's parents of the report and procedures. In situations of staff-to-student bullying or retaliation, the program coordinator or designee will promptly notify the parent/guardian of the alleged target once the investigation has determined that either bullying or retaliation has occurred.

b. Notice to staff member.

In situations of staff-to-student bullying or retaliation, the program coordinator or designee will promptly notify the staff member once the investigation has determined that either bullying or retaliation has occurred and the procedures for responding to it.

c. Notice to another school district.

If an incident of bullying or retaliation involves students from more than one school district, charter school, non-public school, approved private day or residential school or collaborative school and the North River Collaborative is the first to be informed of the bullying or retaliation, then the appropriate Program Director or designee must, consistent with state and federal law, promptly notify the appropriate administrator of the other school district or school so that both may take appropriate action. The Principal/Director of Special Education will then follow their district process in notifying the Superintendent.

d. Notice to law enforcement.

At any point after receipt of a report of bullying or retaliation, or during or after an investigation, if an NRC program coordinator/designee has a reasonable basis to believe that the incident may involve criminal conduct; NRC program coordinator/designee will notify the local law enforcement agency. In addition, if an incident of bullying or retaliation occurs on school grounds and involves a former student under the age of 21 who is no longer enrolled in a local school district, charter school, non-public school, approved private day or residential school or collaborative school, the Executive Director of NRC or designee will notify local law enforcement if s/he believes that criminal charges may be pursued.

C. Investigation

The program coordinator or designee in collaboration with host school administration, as warranted, shall investigate promptly a report of bullying or retaliation, giving consideration to all the circumstances at hand, including the nature of the allegations, the nature of the disability and the ages of the students involved. The following are general guidelines for responding to a report of bullying or retaliation. The guidelines will be adapted as necessary to respond appropriately to the complaint.

Pre-Investigation: Even before fully investigating allegations of bullying or retaliation, Collaborative personnel in collaboration with host school administration will consider whether there is a need to take immediate steps to support the alleged target and/or protect the alleged target from further potential incidents of concern. In taking any such action, however, the rights of both the alleged target and alleged aggressor must be considered. In situations of staff-to-student bullying or retaliation, the program coordinator or designee shall notify the staff member of the right to have a third-party present at all meetings with the staff member concerning the bullying or retaliation report.

Written statement of the complaint: The investigator will seek to determine the basis of the complaint, gathering information from the complainant, including such matters as: what specifically happened, who committed the alleged acts, who was present or may have information about the events, when the events occurred (date, time of day), and where the events occurred.

It is helpful to have these facts in writing. If age appropriate, the complainant may be asked to put the complaint in writing and to sign and date it. If the complainant cannot or chooses not to write a complaint, the investigator will record the allegations, read them to the complainant to confirm accuracy and ask the complainant to sign the document. If the complainant cannot or chooses not to sign, the investigator may sign and date the document her/himself.

Interviews: Once the allegations of the complainant are established, the investigator will gather other evidence, which often involves interviews with the alleged aggressor and/or other witnesses. If appropriate, the investigator should remind the alleged aggressor and witnesses that retaliation against persons whom they believe might have reported the incidents or cooperated with the investigation is strictly prohibited and will result in disciplinary action.

Confidentiality: The confidentiality of the complainant and the other witnesses will be maintained to the extent feasible given the Collaborative's obligation to investigate and address the matter. The names of individuals involved will not be released to other parties.

4. Determinations

The Program Coordinator or designee will make a determination based upon all of the facts and circumstances. If, after investigation, bullying or retaliation is substantiated, the Program Coordinator or designee will take steps reasonably calculated to prevent recurrence and to ensure that the target is not restricted in participating in school or in benefiting from school activities. The Program Coordinator or designee will: 1) determine what remedial action is required, if any, and 2) determine what responsive actions and/or disciplinary action is necessary.

Depending upon the circumstances, the Program Coordinator or designee may choose to consult with the student's teacher(s) and/or school counselor, and the target's or aggressor's parents or guardians, to identify any underlying social or emotional issue(s) that may have contributed to the bullying behavior and to assess the level of need for additional social skills development.

The Program Coordinator or designee will promptly notify the parents or guardians of the target and the aggressor about the results of the investigation (or the staff member and the parents/guardians of the target in situations of staff-to-student bullying) and, if bullying or retaliation is found, what action is being taken to prevent further acts of bullying or retaliation. All notice to parents must comply with applicable state and federal privacy laws and regulations. Because of the legal requirements regarding the confidentiality of student records, the Program Coordinator or designee cannot report specific information to the target's parent or guardian about the disciplinary action taken unless it involves a "stay away" order or other directive that the target must be aware of in order to report violations.

In situations of staff-to-student bullying or retaliation, staff members who are found to have engaged in an act of bullying or retaliation may be subject to disciplinary action up to and including termination of employment. North River Collaborative shall adhere to all applicable federal and state laws as well as any applicable contracts and/or agreements when imposing any such discipline.

D. Response to bullying

1. Teaching Appropriate Behavior Through Skills-building

Upon the Program Coordinator or designee determining that bullying or retaliation has occurred, the law requires that the school or district use a range of responses that balance the need for accountability with the need to teach appropriate behavior. M.G.L. c. 71, § 37O(d)(v). Skill-building approaches that the Program Coordinator or designee may consider include:

- offering individualized skill-building sessions based on North River Collaborative's anti-bullying curricula.

- providing relevant educational activities for individual students or groups of students, in consultation with counselors and other appropriate school personnel.
- implementing a range of academic and nonacademic positive behavioral supports to help students understand pro-social ways to achieve their goals.
- meeting with parents and guardians to engage parental support and to reinforce the anti-bullying curricula and social skills building activities at home.
- adopting behavioral plans to include a focus on developing specific social skills; and
- making a referral for evaluation.

2. Taking Disciplinary Action

If the Program Coordinator or designee decides that disciplinary action is appropriate, the disciplinary action will be determined on the basis of facts found by the Program Coordinator/designee, including the nature of the conduct, the age of the student(s) involved, and the need to balance accountability with the teaching of appropriate behavior. Discipline will be consistent with the Plan and with the student's individual behavior plan and/or IEP.

Discipline procedures for students with disabilities are governed by the federal Individuals with Disabilities Education Improvement Act (IDEA), which should be read in cooperation with state laws regarding student discipline.

If the program coordinator or designee determines that a student knowingly made a false allegation of bullying or retaliation, that student may be subject to disciplinary action.

3. Promoting Safety for the Target and Others

The Program Coordinator or designee will consider what adjustments, if any, are needed in the school environment to enhance the target's sense of safety and that of others as well. One strategy that the Program Coordinator or designee may use is to increase adult supervision at transition times and in locations where bullying is known to have occurred or is likely to occur.

Within a reasonable period following the determination and the ordering of remedial and/or disciplinary action, the Program Coordinator or designee will contact the target to determine whether there has been a recurrence of the prohibited conduct and whether additional supportive measures are needed. If so, the principal or designee will work with appropriate school staff to implement them immediately.

VI. COLLABORATION with FAMILIES

1. **Parent education and resources.** NRC parents will be eligible to attend local trainings through their sending districts as sponsored by the local PTO, PTA, School Councils, Special Education Parent Advisory Council, or similar organizations. NRC will provide individual parent trainings on a case specific basis. The North River School (NRS) will provide bullying and cyber bullying guidance and information to parents at its quarterly parent/teacher conference.

2. **Notification requirements.** Each year in the beginning of school either through the welcoming NRC packet or the student handbook, NRC will inform parents or guardians of enrolled students about the anti-bullying curricula that are being used. This notice will include information about the dynamics of bullying, including cyberbullying and online safety, as well as the student-related sections of the Plan, The Bullying Policy and NRC's Internet Safety Policy. NRC will post the Plan and related information on its website.

VII. PROHIBITION AGAINST BULLYING and RETALIATION

Acts of bullying, which include cyberbullying, are prohibited:

- on school grounds and property immediately adjacent to 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 school district or school; or using technology or an electronic device owned, leased, or used by a school district or school, and
- at a location, activity, function, or program that is not school related or through the use of technology or an electronic device that is not owned, leased, or used by a school district or school if the acts create a hostile environment at school for the target or witnesses, infringe on their rights at school, or materially and substantially disrupt the education process or the orderly operation of a school.

Retaliation against a person who reports bullying, provides information during an investigation of bullying, or witnesses or has reliable information about bullying is also prohibited.

As stated in M.G.L. c. 71, § 37O, nothing in this Plan requires the district or school to staff any non-school related activities, functions, or programs.

VIII. DEFINITIONS

Aggressor is a student or member of a school staff, including, but not limited to, an educator, administrator, counselor, school nurse, cafeteria worker, custodian, bus driver, athletic coach, advisor, to an extracurricular activity or paraprofessional who engages in bullying, cyberbullying, or retaliation.

Bullying, as defined in M.G.L. c. 71, § 37O, is the repeated use by one or more students of a written, verbal, or electronic expression or a physical act or gesture or any combination thereof, directed at a target that:

- causes physical or emotional harm to the target or damage to the target's property.
- places the target in reasonable fear of harm to himself or herself or of damage to his or her property.
- creates a hostile environment at school for the target.
- infringes on the rights of the target at school; or
- materially and substantially disrupts the education process or the orderly operation of a school.

Cyberbullying is bullying using technology or electronic devices such as telephones, cell phones, computers, and the Internet. It includes, but is not limited to, email, instant messages, text messages, and Internet postings. See M.G.L. c. 71, § 37O for the legal definition of cyberbullying.

Hostile environment, as defined in M.G.L. c. 71, § 37O, is a situation in which bullying causes the school environment to be permeated with intimidation, ridicule, or insult that is sufficiently severe or pervasive to alter the conditions of a student's education.

Retaliation is any form of intimidation, reprisal, or harassment directed against a student who reports bullying, provides information during an investigation of bullying, or witnesses or has reliable information about bullying.

Staff includes, but is not limited to, educators, administrators, counselors, school nurses, cafeteria workers, custodians, bus drivers, athletic coaches, advisors to extracurricular activities, support staff, or paraprofessionals.

Target is a student against whom bullying, cyberbullying, or retaliation has been perpetrated.

IX. RELATIONSHIP to OTHER LAWS

Consistent with state and federal laws, and the policies of the school or district, no person shall be discriminated against in admission to a public school of any town or in obtaining the advantages, privilege and courses of study of such public school on account of race, color, sex, religion, disability, national origin, or sexual orientation. Nothing in the Plan prevents the school or district from taking action to remediate discrimination or harassment based on a person's membership in a legally protected category under local, state, or federal law, or school or district policies.

In addition, nothing in the Plan is designed or intended to limit the authority of the school or district to take disciplinary action or other action under M.G.L. c. 71, §§ 37H or 37H^{1/2}, other applicable laws, or local school or district policies in response to violent, harmful, or disruptive behavior, regardless of whether the Plan covers the behavior.

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