

## Exhibit 16

# Supplemental Declaration of Jordan Mix

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF IOWA**

IOWA SAFE SCHOOLS f/k/a GLBT YOUTH IN IOWA  
SCHOOLS TASK FORCE, et al.,  
*Plaintiffs,*

v.

KIM REYNOLDS, in her official capacity as Governor of  
the State of Iowa, et al.,  
*Defendants.*

Case No. 4:23-cv-00474

**SUPPLEMENTAL  
DECLARATION OF  
JORDAN MIX**

---

COMES NOW, Jordan Mix, and pursuant to 28 U.S.C §1746, declares under penalty of perjury that the following is true and correct:

1. My name is Jordan Mix. I am over 18 years old, and I am a resident of Iowa. I have personal knowledge of the facts as stated herein.

2. Iowa Safe Schools (“ISS”) is a statewide non-profit organization founded in 2002 that seeks to provide safe and supportive learning environments and communities for LGBTQ+ youth in Iowa. ISS achieves this mission through education, outreach, advocacy, and direct services.

3. ISS provides a number of services and resources in pursuit of its mission. ISS’ main program is maintenance and development of Gender Sexuality Alliances (“GSAs”) within its GSA Network. The GSA Network offers resources, supports, and direct interactive services to GSAs, students, and faculty advisors.

4. Another type of service and resource ISS provides is professional development. As Director of Educational Programming for ISS, I am in charge of these services.

5. ISS provides professional development for Iowa educators through direct consultation with client school districts; an Iowa Safe Schools Academy that offers credits for educator's licensure renewal and, in partnership with Drake University, graduate credits for degree advancement; and conferences and symposiums for educators to attend, for which they have the opportunity to receive licensure renewal credit. Iowa Safe Schools' professional development offerings are designed to support our primary mission to provide safe, supportive, and nurturing learning environments and communities for LGBTQ+ youth and their allies.

6. With respect to ISS's direct consultation programs, I regularly meet with Iowa educators to help them better understand and meet the needs of LGBTQ+ kids. For example, in the past I have presented on topics such as "LGBTQ 101," how to build support systems for LGBTQ+ students and their allies, how to build empathy among students on issues faced by LGBTQ+ youth, and understanding and respecting students' pronouns, among other things. School districts hire ISS to provide these professional development opportunities directly to educators at their schools, such as during teacher in-service days.

7. In fiscal years 2021 and 2022, I provided these services to educators 31, then 25 times, respectively. In 2023, I provided these services in educational settings only 11 times total. Of these 11 instances, only 3 public school districts were represented. I also provided these services to one private charter school, and we were included in the Green Hills Area Education Agencies' annual conference, as well as the annual School of Education conference for the University of Northern Iowa. The 11 instances includes the conferences and the private charter school.

8. This sharp decline in engagement with ISS's direct professional development services is attributable to SF 496. I have received numerous cancellations and rejections that affirm as much. Some school administrations believe they are flatly prohibited from having these

conversations with ISS due to SF 496. Others believe the law prohibits or discourages their educators from implementing the guidance provided through our professional development services and would subject their educators to substantial risk of discipline; for example, due to SF 496's notification provision, schools and educators fear learning of students' transgender or gender nonconforming status, as they worry they could be forced to put the students at risk by reporting this to their students' parents or guardians. Still other schools feel that SF 496 and other anti-LGBTQ legislation from the Iowa state government has created an environment that emboldens pushback from school boards or parents within the district towards efforts of LGBTQ+ inclusion.

9. Due to this decline, ISS has had to broaden its client base to achieve its goals. Thus, rather than spending my time providing direct professional development to educators as I have described, I have focused on offering these programs to Iowa colleges. I have also been offering professional development to companies in Iowa to help them better adapt to a changing workforce and specifically to help them update their policies and approaches to LGBTQ employees. In this way, ISS is at least able to meet Iowa students' needs for a safe and affirming environment after they graduate, if we are restricted in our ability to support them through professional development of their educators during their K-12 education.

10. Further, the content of ISS's direct professional development services has changed substantially after SF 496. While previously my presentations were, as described above, focused on building out the safest and most affirming environment possible for LGBTQ+ students, my presentations since SF 496 have focused on identifying what supports remain available post-SF 496 and what questions educators must be asking their administrators to understand their school's policy and approach to compliance with the law.

11. SF 496 has also impacted the Iowa Safe Schools Academy. As noted, the Iowa Safe Schools Academy is our offering of online professional development courses for Iowa educators, which allow them to fulfill their license renewal obligations and obtain graduate credit to move up teacher pay scales. The courses offered have generally been in content similar to the in-person professional development trainings described above, and have focused on how best to support different student groups in classrooms, including LGBTQ+ students, and set them up for acceptance and success.

12. As with direct professional development, there has been a substantial decrease in participation in the Academy since last year. In the 2022-2023 school year, ISS had a total of 2,481 course registrants in the Online Academy. From July 1, 2023, to June 30, 2024, ISS had a total of only 1,661 course registrants—a decrease of 820 registrants, or about a 33% drop. I cannot state with certainty how much of this decline is attributable to SF 496 and how much to a separate legislative change modifying the licensing requirements of teachers with substantial experience.

13. I can, however, state that the content of the Academy courses has changed due to SF 496. Notably, now these classes cover not only how to support LGBTQ students, but new sections I have developed about responding to laws and policies.

14. Finally, SF 496 has impacted ISS's conference and symposium offerings. In prior years, we have hosted three conferences each year: the Engage and Empower Summit in Fall, the Trans Education Summit in Winter, and the Anti-Violence Symposium in Spring. Going forward, ISS will only be hosting the Trans Education Summit, and is canceling the other two offerings. Canceling these two conferences resulted in an approximately \$30,000 annual loss to ISS due to lost attendance fees and sponsorships. We are canceling these two conferences due to the sudden

and substantial decrease in attendance from schools since the beginning of the 2023-2024 school year, after passage of SF 496.

15. In an attempt to help make up some of the revenue lost due to cancellation of the Engage and Empower Summit and the Anti-Violence Symposium, I created new programming specifically for private employers and Diversity Equity and Inclusion professionals. I view this as furthering ISS's mission by working to create more inclusive workplaces for students after they leave school. Besides needing to make up the revenue, I felt that this change was necessary for me because I am rarely invited to schools since SF 496 was passed.

16. The reasons schools have cancelled or declined attendance at our conferences is similar in type to the reasons given for cancelling or declining direct professional development services. In short, in a post-SF 496 Iowa, many educators fear the consequences of engaging with LGBTQ+-inclusive programming and implementing it in their classrooms.

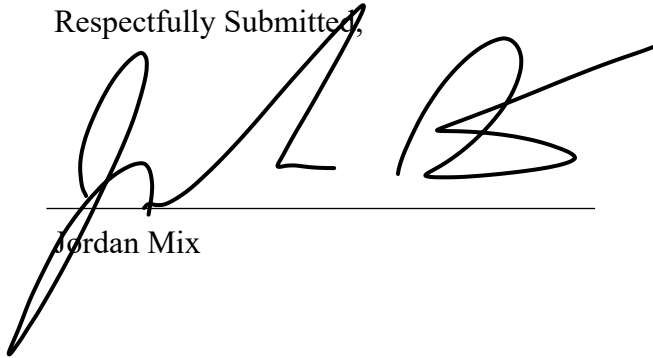
17. SF 496 has impacted the nature of my work in other ways, as well. In connection with ISS's professional development services, it is common for me to develop relationships with educators and school districts and to provide them guidance on supporting their LGBTQ+ students and allies. Before SF 496, a typical, occasional question would be, "What does a trans inclusion policy look like?" But since SF 496, the questions I receive have increased substantially and are largely related to the law, such as, "What does it mean to request an accommodation for pronouns?" Or, "I teach the 5<sup>th</sup> grade class on puberty and I feel like I am not only not teaching inclusively, but that I am not allowed to. How can I be inclusive in my teaching considering the law?" Another teacher commented to me that, "When the state laws differ from the national laws, it is hard to know what to do."

18. In fact, responding to questions on how to interpret and comply with the law represented most of my work from the enactment of SF 496 through the first semester of school. While the number of questions on the applicability or meaning SF 496 have slowed down, I do not expect them to stop, and responding to them will now always be a drain on my time that would have otherwise been spent on the core professional development programming types I described above. It is now routine for educators to encounter fact-specific issues in their classroom that may implicate SF 496, which neither the law nor their school's policy on complying with the law may clearly answer.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated this 17 day of October, 2024 at Des Moines, Iowa.

Respectfully Submitted,

A handwritten signature in black ink, consisting of stylized initials and a surname, written over a horizontal line. The signature is written in a cursive, somewhat blocky style.

Jordan Mix