

Exhibit 6

Supplemental Declaration of Becky Tayler

**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. 4:2023-cv-474

**SUPPLEMENTAL
DECLARATION OF
BECKY TAYLER**

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

1. My name is Becky Tayler, and I am the Executive Director of Iowa Safe Schools (“ISS”) (formerly known as “GLBT Youth in Iowa Taskforce”). I am an Iowa resident over eighteen (18) years of age and make this declaration based on my own personal knowledge and my review of records maintained by ISS. If called as a witness, I could and would testify completely as to the matters set forth herein.

2. I have worked with LGBTQ+ youth in Iowa for most of my 10-plus year career in social work and with ISS for six of those years. I hold bachelor’s and master’s degrees in social work, with a focus on cultural competency when working with marginalized populations. I submit this declaration in support of ISS’s participation as a plaintiff in this litigation.

Background on ISS

3. ISS is an Iowa not-for-profit organization founded in 2002 with a primary mission to provide safe, supportive, and nurturing learning environments and communities for LGBTQ+ youth and their allies through education, outreach, advocacy, and direct services. It is a state-wide organization that serves students and student-led organizations for LGBTQ+ students and allies within Iowa. Iowa Safe Schools serves at least 4,000 students, representing over 100 Gender Sexuality Alliances (“GSAs”) in middle schools and high schools in districts across the state. ISS is headquartered at PO Box 704, Des Moines, IA 50303.

4. ISS has established multiple programs to support LGBTQ+ students in Iowa schools. ISS’ flagship program is the Iowa GSA Network. The Iowa GSA Network is designed to empower students on their mission to create safe spaces through their GSAs (sometimes also called gay-straight alliances). It is designed to provide resources and assistance to LGBTQ+ and allied students as well as the educators and advisors who support them. The Network assists students interested in starting a GSA at their schools, and connects GSAs around the state. The GSA Network’s ultimate goal of enriching the lives of LGBTQ+ youth is accomplished through partnerships with student leaders, and collaboration with GSA advisors and community members and organizations and companies throughout the state. The Network offers resources, support, and direct interactive services to GSAs, students, and their advisors.

5. ISS also provides professional development, licensure renewal, and graduate credits to educators individually and district-wide, reaching over 4,000 educators annually. ISS currently has several contracts with school districts to administer LGBTQ+-inclusive trainings to staff, in addition to assisting in creating school policies supporting LGBTQ+ students. Since 2014, ISS has offered Iowa Board of Educational Examiners-approved License Renewal credit to Iowa’s

educators through our program, Safe Schools Academy. Safe Schools Academy also offers Graduate Credit through a partnership with Drake University. Educators and other interested parties can register online. All courses are asynchronous and hosted online.

6. In addition to managing the Iowa GSA Network and providing professional development to schools and districts across the state in the form of in-service learning, ISS also regularly partners with other nonprofits like Central Iowa Rainbow Families, Capital City Pride, and others to provide programming and events that reach additional students, families, and educators. ISS staff regularly host community workshops, including a Youth Activism workshop for the Ames Library's Pride series, LGBTQ+-inclusive training for the Mentors in Violence Prevention program housed in University of Northern Iowa's Center for Violence Prevention, and other workshops through the Iowa YouthNet Conference. ISS has also collaborated with Capital City Pride to host community events, such as a fireside chat with astronaut Peggy Whitson. In working with over 4,000 students annually, ISS has established itself as a crucial resource and advocate for LGBTQ+ youth across Iowa.

7. ISS also performs data collection with respect to incidents of bullying, harassment, and discrimination experienced by LGBTQ+ youth in Iowa schools. As the recipient of state and federal grant dollars under the Victims of Crime Act program, ISS tracks "victim data" and provides resources and technical assistance to the students affected. ISS securely tracks such data, recording the ages, demographics, and geographic locations of the incidents. Additionally, ISS records the "victimization type" associated with each incident, such as dating violence, homelessness, bullying, or survivor of suicide. ISS receives such information through different web portals and sources, including self-reports from survivors of crime, bystander reports of witness accounts, and through visits in-person with GSA groups. ISS reports this data to the Victim

Assistance Section of the Office of the Attorney General of Iowa as required by the grant's certified assurances.

The critical need for a safe and inclusive school environment for LGBTQ+ youth

8. According to the Center for Disease Control (CDC) 2021 Youth Risk Behavior Survey in Iowa, Gay, Lesbian, or Bisexual (GLB) students face heightened vulnerability in the educational environment. These students, in comparison to their heterosexual peers, exhibit substantially elevated rates of school-related challenges. Notably, 13.1% of GLB students reported not attending school due to feelings of unsafety, compared to 6.9% of their heterosexual peers. Additionally, 11.6% of GLB students reported experiencing threats or injuries with weapons on school property, while the rate for their heterosexual peers was 5.9%. A significant disparity is observed in bullying experiences, with GLB students being twice as likely to experience bullying on school property or over electronic communication. Furthermore, the survey underscores that GLB students experience significantly higher levels of depressive symptoms. A substantial 73.7% of GLB students reported feeling sad or hopeless almost every day for two weeks or more, whereas only 31.3% of their heterosexual peers reported the same. Moreover, a striking 64.7% of GLB students describe their mental health as most of the time or always "not good," which contrasts starkly with the 26.9% reported by their heterosexual peers. Perhaps most alarming, Gay, Lesbian, or Bisexual students report markedly higher rates of contemplating suicide, developing plans for self-harm, and attempting suicide.

9. The Iowa Department of Health and Human Services (DHHS) Iowa Youth Survey 2021 Findings report very similar disparities.

10. Notably, each one of these disparities is more prevalent in Iowa compared to national findings, as indicated by the Trevor Project's National Survey on LGBTQ Youth Mental

Health for 2021. Data from the Trevor Project also shows that negative mental health outcomes are more prevalent in Iowa than in other states. In 2022, 2023, and 2024, LGBTQ youth who found their school to be LGBTQ-affirming reported lower rates of attempting suicide.

11. These findings underscore the urgent need for targeted interventions, support, and legal protections to create a safer and more inclusive environment for LGBTQ+ youth in Iowa. and critical to ISS's mission is access to data that provides an accurate picture of the scope of the vulnerabilities faced by the students ISS serves.

12. SF 496 adversely affects ISS's ability to access such data. For example, although the CDC's 2021 Youth Risk Behavior Survey did not gather data on whether students polled identified as transgender, nonbinary, or gender non-conforming, the upcoming CDC survey will gather this data. However, Iowa students will not participate in this survey. Instead, Iowa students will be asked to respond to the IDHHS Iowa Youth Survey, which will not gather the relevant data for these youth. Additionally, because of SF 496's parental notice and consent requirements, ISS expects the response rate for LGBTQ+ youth to decrease, impacting the quality of data available and adversely affect ISS's mission, which depends on having access to robust data to provide an accurate picture of the scope of the vulnerabilities faced by the students ISS serves.

ISS' GSA Network and the support a GSA provides

13. One way ISS works towards creating a safe and inclusive school environment for LGBTQ+ youth is through the GSA Network. A GSA is a youth-led organization (typically a school-based extracurricular club) that focuses on providing a safe space for LGBTQ+ youth, addressing anti-LGBTQ+ harassment and discrimination, promoting inclusive and affirming policies, and educating people about gender identity and sexual orientation. Each GSA in Iowa is organized and run by students on a purely voluntary basis, and every GSA—like any other

extracurricular club—is supposed to have a faculty advisor who supervises meetings. ISS created the GSA network in 2016. GSAs become chapter members of the GSA Network through the ISS website (<https://iowasafeschools.org/the-gsa-network>) or by connecting with the GSA Network Coordinator, who provides an overview of Youth Engagement programs and services. There is no cost for GSAs to join the Network. ISS acts as a central hub for its member GSA organizations, tracks the issues that students are facing, provides supportive services to student members and faculty advisors, assists students who are interested in starting their own GSAs to get their group established, and manages a list serv to facilitate dissemination of information to Iowa GSAs and to connect GSAs with student groups elsewhere. Network GSA organizations are located throughout the state.

14. Members of the GSA Network receive individualized support and resources for their group, as well as assistance to groups who are facing roadblocks of issues from inside (or outside) the group. Each member GSA is offered a site visit from ISS staff once or twice per school year. GSA visits may include a workshop of the student's choice; common workshop topics center around building student leadership and group capacity.

15. Any student, regardless of whether their school has a GSA or if the school GSA is part of the Network, can join the Network as an individual student and they can sign up for the GSA Network list serv, which is used to share programming opportunities, resources for student leadership, and advocacy alerts. Members, GSA faculty advisors, and interested non-member students may also access to several annual events including: GSACon, Student Day at the Capitol, Aspire to Inspire, The Governor's Conference on LGBTQ Youth, and Pride Tailgate, which collectively host over 1,000 attendees.

16. ISS offers all GSA advisors and students in Iowa access to several resources including the GSA Guidebook, the Parent and Family Guidebook, safety planning worksheets, explainers for various bills, and resources for victims of bullying. The GSA Guidebook is a resource written for student leaders to help them navigate the process of starting and running a GSA. It provides guidance on writing a mission statement, bringing in new members, planning community events, and more. The Parent and Family Guidebook is a resource designed to provide information, guidance, and support to parents and families of LGBTQ+ students. It offers insights into understanding common issues for LGBTQ+ young people, how to support and advocate for LGBTQ+ youth, and how to create a more inclusive and accepting environment for them at home, in school, and in their communities. Safety plans are a resource for families and students to identify people and coping strategies in the young person's life that they can turn to for support. They are also key for communicating a student's needs to their place of education to prevent or respond to incidents of bullying and/or harassment. ISS typically has bill explainers for students during each legislative session. These are documents or presentations that clearly and concisely explain the contents, implications, and significance of proposed or passed pieces of legislation. ISS also has resources for students experiencing bullying; these clarify student's legal rights to safe education, provide guidance on students can exercise these rights, and provide mental health tips for students dealing with the impacts of bullying.

17. ISS also provides resources to member GSAs in the face of tragedy or trauma. The trauma that one member of a GSA experiences can also be felt by fellow students who witnessed the incident or who experience loss as a result. In the worst-case scenario, when a member of a GSA takes their own life, other members of the GSA can be impacted heavily, and require immediate resources and support on an emergency basis, such as access to suicide hotlines,

counselors, and supportive people to whom the affected students can talk. After a group experiences a suicide, our GSA Coordinator connects them with the American Foundation for Suicide Prevention, the “After a Suicide” postvention resource from American Foundation for Suicide Prevention, the 24x7 crisis assistance from the Iowa Victim Service Call Center, and the resources provided by the Trevor Project.

18. Each GSA a Plaintiff in this case attended—including Plaintiff A.C., at Twain Elementary School; Plaintiff James Doe, at a high school in the Sioux City Community Schools; and Plaintiff P.B-P., at Waterloo West High School—is part of ISS’s GSA Network.

The impact of SF 496 on ISS and the GSAs and students it serves

19. SF 496 has had a devastating impact on LGBTQ+ students across the state. Students report that anti-LGBTQ+ bullying and harassment are on the rise as their peers feel emboldened by schools’ lack of proactive efforts towards inclusivity. ISS has heard from advisors and students reporting that confusion over the law has caused some to leave public school for homeschooling or charter schools. Many students have reported feeling sad and rejected when their identity is treated as “promiscuous,” regardless of whether they are actually sexually active. Other students have reported feeling hopeless and isolated, and that these feelings were widespread amongst their LGBTQ+ peers. Tragically, due to the notable, perceivable increase in completed suicides, ISS has begun formally documenting the number of completed suicides as of calendar year 2023.

20. ISS staff have spent a tremendous amount of time helping Iowa’s parents, educators, and students try to understand SF 496 and its potential implications for them and their schools. This additional time has been spent fielding one-on-one questions, working with school district administration teams on policies they’re implementing because of SF 496, and developing

resources for Iowa's educators to help them provide support for LGBTQ students within the boundaries of SF 496.

21. Additionally, while GSA visits with staff and students were previously focused on building student leadership or group capacity, many GSA visits are now focused on student's questions about SF 496. In other words, rather than building on the gains these students have made towards empowerment and inclusion in their schools, ISS has been forced to devote its time and resources to dealing with the fallout and confusion over SF 496.

22. This tonal shift during GSA visits already was apparent when SF 496 was being introduced and debated during the legislative session and then passed into law. Most GSA visits during that time were spent answering questions and discussing what could happen with SF 496. Two common responses from students emerged. Some students were galvanized to take action, as many felt that their school would not be supportive of students under such a law. Many students became very withdrawn during these discussions, sometimes later disclosing their fear or anxiety of being outed to parents. Those students who feared their school would withdraw support were, in some cases, proven right. For example, books featuring LGBTQ+ characters or themes were removed and flags or signage expressing messages of support and affirmation for LGBTQ+ youth were taken down. Many of those students who became withdrawn themselves have only become more so, and are unlikely to participate in their GSA or express their LGBTQ+ identity for fear of being outed.

23. SF 496 has prompted many school administrators to restrict the activities of member GSAs or otherwise treat them differently from other student-led groups. Schools require student groups like GSAs to be sponsored by a faculty advisor, who facilitates and supports the group's activities, and, in the case of GSAs in the Network, works with ISS to provide

opportunities for student members and gather additional support. Some GSA advisors have reported being instructed to take a step back from the GSA, only being permitted to sit in the room but not provide any guidance like an educator might for other student-led groups. A few advisors for member GSAs have said that their administrators have told them to not discuss any part of the legislation with their students. Advisors have reported confusion on whether students need to sign permission slips to join GSAs (even though no other club requires this).

24. Due to SF 496, school administrators have been reluctant to allow student GSAs to interact with younger students in the district, reasoning it may constitute “promotion” in violation of the law. Advisors have reported their GSA has been prohibited from displaying signs or promoting the club in classrooms or hallways where students younger than seventh graders may be present, even in schools with mixed populations that include eighth or ninth graders, and even though other noncurricular clubs are not subject to those restrictions.

25. Restrictions and burdens on a club’s activities, particularly when coupled with students’ growing fear of outing or reprisal for expressing their identities, has meant many GSAs have gone inactive this year.

26. For example, when the ISS’s GSA Coordinator reached out to an educator advisor contact for a member GSA in the College Community School District, the advisor responded, “With us being a 5th/6th building, we will not be able to run our GSA this year due to the new legislation.” Another group stopped meeting because they could not find a faculty advisor, as teachers are reluctant to put themselves in a situation where they may violate the law, for example, by refusing to comply with SF 496’s “forced outing” provision and out a student who joins the GSA.

27. Other advisors mentioned that students had become withdrawn from the group or had become withdrawn from school altogether. One group stopped meeting because their student leader was only sporadically attending school.

28. SF 496's forced outing provision has had particularly disruptive results for students, in and out of GSAs. After SF 496, many students have been told that any request for teachers to use their proper name and pronoun will result in them being outed to parents and family. In one instance, an advisor from the Burlington School District shared with an ISS staff member that a student had reached out to their educators to request a particular name be used, but when the student was informed of SF 496 and what that meant for the school's response, they retracted the request. Other advisors and students said their school policy does not allow students to retract a request to educators. Others have reported confusion over what sort of question might constitute a request. This ambiguity puts students in a difficult position, as they are not sure what might trigger a report home. As a result, many students will choose not to seek support at all.

29. GSA advisors have pointed to the law's forced outing provision as the cause of restrictions and/or closure of GSAs. Students and faculty members alike are confused about what speech during a GSA meeting could trigger a report home or whether mere attendance is sufficient. Faculty members who previously sponsored student-led GSA chapters now are reluctant to do so for fear of being forced to out student members as a result of the law, forcing these chapter members to close.

30. Some advisors for member GSAs reported not receiving any guidance from their school district on the legislation. Although many advisors said they would rather lose their job than out a student, these advisors thought it was likely other educators would out students, leaving students not knowing who to trust and making it harder for teachers to build a positive relationship

with them. In one example of this confusion, an educator in the Fort Madison school district reported to ISS staff that a fellow educator was reprimanded for using a student's chosen name. The educator reported that district leaders reprimanded the teacher for using the student's chosen name because it was not listed in the school's informational system and therefore, they were not allowed to call the student that name.

31. Nearly every classroom teacher, administrator, student, and parent we have worked with since SF 496 was first announced has been unsure of what the law will apply to or when it will apply. There is no consistent understanding of what will be seen as a "request for an accommodation" that requires reporting home or what materials or activities might constitute a "program," "promotion," or "instruction" related to gender identity or sexual orientation, or what books contain a "sex act," to name only a few areas of confusion.

32. ISS's staff has spent a lot of time discussing these questions with educators and developing resources for students in an attempt to provide clarity on SF 496, and has been frustrated by the ambiguous language and lack of guidance from the state. The recently released rules relating to SF 496 provide no clarification for the already vague statute, instead restating many of the broad requirements that the law institutes. In some areas, the rules create even more ambiguous expectations for educators, including the proposed rules' provision regarding "neutral statement(s)" relating to sexual orientation or gender identity. Proposed Rules, Item 5 (281 Iowa Admin. Code r. 12.3(15)(c)).


33. SF 496's implementation has caused ISS staff to spend immense time and resources answering questions and intervening in scenarios the new law has caused. Typically, these efforts would be directed towards GSA outreach and providing resource and support of GSAs and educators, as well as fundraising, legislative session prep, and community partnerships. However,

because of our limited capacity, our staff has had to shift our resources to focus on the implementation and fallout of SF 496.

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 16 day of October, 2024, at Urbandale, Iowa.

Respectfully Submitted,



Becky Taylor