



# STATE OF IOWA

CHESTER J. CULVER, GOVERNOR  
PATTY JUDGE, LT. GOVERNOR

IOWA CIVIL RIGHTS COMMISSION  
RALPH ROSENBERG  
EXECUTIVE DIRECTOR

4/1/2009

Lisa Mottet, Esq.  
Transgender Civil Rights Project, Director  
National Gay and Lesbian Task Force  
1325 Massachusetts Avenue NW, Suite 600  
Washington, DC 20005

Dear Ms. Mottet.

In 2007, with passage of SF 427, Iowa joined the growing ranks of states which extended the scope of civil rights laws to include sexual orientation and gender identity. Since July 1, 2007, the official date the new law took effect, our agency has received 47 complaints, alleging discrimination based on sexual orientation (36), or gender identity (11). Over 20 months of work with this bill shows that our state averages about 2-3 cases per month—which based on regional and national research is not that dissimilar from other states.

We have been very clear with employers and the public as to what the law covers and does not cover. The following examples are from our brochures –available at [http://www.state.ia.us/government/crc/docs/sogiEmploymentbrochure\\_july08.pdf](http://www.state.ia.us/government/crc/docs/sogiEmploymentbrochure_july08.pdf)

### May an employer enforce dress and grooming standards?

Yes. An employer may establish and require an employee to adhere to reasonable workplace appearance, grooming and dress standards that are directly related to the nature of the employment ; dress codes are not precluded by state or federal law as long as an employer allows an employee to appear, groom and dress consistent with the employee's gender identity.

### Does the new law require employers to eliminate gender-segregated restrooms?

No. It is still legal in Iowa for employers to maintain gender-segregated restrooms. The new law does require, however, that employers permit employees to access those restrooms in accordance with their gender identity, rather than their assigned sex at birth.

During legislative debate, opponents argued these laws could be dangerous because they can be used by sexual predators to gain access to women's restrooms and locker rooms. We have simply not been informed of any such occurrence. We have not received any formal complaints, though we have received informal inquiries about 'bathroom' use.

During debate and implementation, we did receive inquiries on cross dressing at work. We have not received any complaints based on this fact situation. Under our law, employers have the right to enact reasonable dress codes. We have also educated members of the public and lawmakers that people who cross dress are highly unlikely to do this in a work situation.

I strongly believe that our strategies of keeping our bill as non partisan or bipartisan, working with both business and labor, garnering strong support from the faith communities, could be a template for other states. And I would be more than willing to help with other states.

Sincerely,

Ralph Rosenberg