



RETHINKING SCHOOL SAFETY IN IOWA

The Harms of School Resource Officers

Table of Contents

Acknowledgments	3
Executive Summary	4
National Overview of SROs.....	8
SROs in Iowa	9
Methodology of This Report	12
Problems With SRO Contracts	13
Inadequate SRO Programs Stated Purposes	14
Inadequate SRO Program Review	15
SRO Programs Are Expensive.....	16
Minimal Training for Dealing With Children	17
Students Too Often Not Informed of Their Rights When Interacting With an SRO.....	18
Parents Notified Too Little and Too Late.....	20
Unclear Processes for SRO Complaints	24
Black Students and Students With Disabilities Penalized at a Higher Rate.....	25
The Reasons for SRO Referrals and Arrests.....	27
Recommendations for Action	28
Glossary of Terms	32
End Notes	34

Acknowledgments

The background and policy guidelines that serve as a foundation for this report are the result of years of experience and research provided by the ACLU of Iowa's Advocacy and Community Engagement (ACE) team, which in turn reflects the lived experiences and advocacy of students, parents, and families in Iowa schools with SROs.

This experience and research was supplemented with a thorough literature review of recent empirical studies addressing the nationwide effects of SROs on school safety and educational equity. It was further supplemented by the excellent past work of ACLU National and our fellow ACLU affiliates from around the country, particularly our neighbor affiliate, the ACLU of Nebraska, whose impactful model we sought to replicate in Iowa.¹

The ACLU of Iowa also wants to specifically acknowledge and thank the following individuals for their guidance and wisdom in the creation of this report: Harold Jordan, senior education equity coordinator at the ACLU of Pennsylvania; Nickole Miller, associate professor of law at Drake University, director of the Children's Rights Center, and director of the Joan and Lyle Middleton Center for Children's Rights; and Jenny Schulz, director of the Kids First Law Center.

Executive Summary

SROs are a growing problem in Iowa.

The increasing number of School Resource Officers (SROs) has long been a concern for the ACLU, both nationally and in Iowa.

Between 2018 and 2021, the number of SROs nationally at high schools, middle schools, and even elementary schools has increased by 23 percent.

Nearly all SROs carry a gun. Most also carry a taser, which is less lethal than a gun but still poses significantly increased health risks for children.²

To get a better statewide picture of the current state of SROs, the ACLU of Iowa conducted a study to take a focused look at the growing number of SROs in Iowa schools and the impact they are having on safety and students.

While not comprehensive, this study found that there are at least 130 SROs in 78 Iowa school districts, about one-fourth of all Iowa school districts.

About one-fourth of all Iowa school districts have at least one SRO.

The core of the report is the data collected from a total of 154 public records requests, both to school districts and the corresponding local police departments that employ the SROs.

To see the individual open records responses from each school district and the corresponding law enforcement agency, please [click here](#).

The study also drew on data from hundreds of Iowa school districts kept by the U.S. Department of Education Office for Civil Rights (OCR), as well as a number of national academic studies.

We found that not all school districts reported information about law enforcement interactions with students to the OCR, even though the law requires it. We also found that many districts reported zero referrals or arrests. This may be the case, but it would be inconsistent with overall trends and may instead suggest inaccurate reporting to the Office for Civil Rights.

To see what the school districts who responded to the OCR reported (number of referrals and arrests, broken down by race), [click here](#).

Overall, our study found that SRO programs in Iowa are highly concerning. They lack sufficient guidance and oversight, which results in the over-criminalization of students, particularly Black students and students with disabilities (as defined by federal law).

Key Findings

More specifically, this study found:

► **There is no evidence that SROs make students safe but there is evidence that they can do harm.**

A survey of national studies could not find a single one that clearly demonstrated that having an SRO keeps a school any safer than a school without an SRO, including during tragic school mass shootings.

In fact, there is evidence that SROs can actually *create* harm for students by escalating a minor incident into an actual criminal offense that can follow a young person their entire life. See page 8.

► **SROs disproportionately discipline and arrest Black students.**

Black students in Iowa make up 7 percent of the population but account for 13 percent of referrals and 21 percent of arrests, *even though national studies indicate that Black students do not actually misbehave or commit crimes in schools at a higher rate.*

This means that a Black student receives a referral at twice the rate of other students. A Black student is arrested at 3.7—nearly four times—the rate of other students. See page 25.

► **SROs also disproportionately discipline and arrest students with disabilities.**

Students with disabilities make up 13 percent of the student population, but account for 27 percent of SRO referrals and 26 percent of arrests.

That means students with disabilities are either referred or arrested at 2.3 times the rate of students without disabilities. Page 25.

► **SROs often discipline students, including those in elementary school, for minor infractions traditionally handled better by school officials.**

For example, the study found that students being caught vaping either nicotine or THC is by far the most common reason for SRO intervention. Vaping does not require an armed police officer to address.

The incident reports filed by SROs are likewise filled with their involvement with students calling each other names, pushing, spreading rumors, and other minor offenses, including students being “disrespectful” in class, and causing “drama with a group of girls.” None of these violate any laws and do not warrant law enforcement involvement.

Some examples:

In Perry, in two separate incidents, the SRO was called in to handle a 7-year-old boy “who was running through the hallway and becoming agitated with staff.” In another, the SRO intervened because a 6-year-old was “trying to destroy a classroom” and “being physically disruptive.”

In Pella, an SRO became involved in the investigation of a 10-year-old boy kicking a ball at a 9-year-old girl and shaking a climbing net she was on.

In Sioux City, a student taking a bag of popcorn on his way out the door was investigated as theft.

Also in Sioux City, four 14-year-old boys egged a house, not on school grounds. SRO records are unclear, but indicate the boys were investigated and possibly even charged with criminal mischief.

► **SROs come at a considerable financial expense to schools and communities.**

The average cost of employing an SRO in Iowa is at least \$98,000, which may or may not include expenses and other costs. By way of comparison, the base average wage for a school counselor, who could potentially head off student behavior problems before they start, is \$70,015; the average teacher wage is \$66,655. Page 16.

Key Terms

A referral occurs when a school employee reports a student to an SRO or other law enforcement officer to address a perceived problem on school grounds. It covers a wide variety of interactions, everything from an inquiry on the well-being of the student to questioning the student about their or others’ actions involving anything from vaping to a fight.

A referral sometimes can lead to an SRO filing an **incident report**, which is a public record detailing what happened during the referral.

A referral also can result in a student having a choice between being formally charged with a crime, such as criminal mischief or violation of Iowa’s underage smoking laws, or being required to attend a diversion program.

Diversion programs can vary widely. Some are focused on resolving the root problem that led to the incident; some contain religious components; and others are focused primarily on self-improvement. Diversion programs can be helpful for some students in avoiding the long-term consequences of a juvenile delinquency or criminal case. However, some programs may be problematic for children if they are run by religious groups that conflict with the student’s or parent’s own beliefs, or if they shame or stigmatize students.³

A referral can also lead to a **citation**, which usually requires paying a fee or making a court appearance, as with a traffic ticket. This is a common action taken when a student is caught vaping.

A referral could, most seriously, lead to an **arrest**, which is a detention and possible formal charging of a student by law enforcement at a police department or equivalent law enforcement facility.

► **Police officers who are hired as SROs often have little to no training in dealing with children in a school environment.**

The study found that 78 percent of school districts do not have SRO training requirements.

And 58 percent of law enforcement agencies, who provide the SROs to the school districts, have no formal training requirement for these officers entrusted with children. See page 17.

► **Record-keeping on SRO referrals and arrests is erratic and often minimal.**

SRO reporting on arrests and referrals varied widely. Some districts report absolutely no arrests or

referrals and do not track by race. Some give few or no details about the referrals and arrests their SROs are making.

This is a major problem because if a school district and law enforcement agency are not keeping good records and not paying close attention to what SROs are doing, they cannot address the harms inherent with having law enforcement officers embedded in their schools.

These reporting failures potentially violate federal reporting requirements and SRO contracts. Page 8.

► **The process for students or parents making a complaint about an SRO is unclear.**

None of the school districts studied produced an SRO-specific policy on how students and parents can complain about SRO conduct. See page 24.

► **Too few policies exist to ensure that SROs are informing students of their rights.**

Only 3 percent of the school districts studied required that students be informed of their rights when interacting with an SRO.

And only 37 percent of the law enforcement agencies employing them had SRO-specific policies requiring that students be informed of their rights. Page 18.

► **Too few policies exist to make sure parents and guardians are notified when their child is questioned by an SRO.**

Almost half—44 percent—of districts were unable to produce a policy for notifying parents or guardians when their child is expected to be or has been questioned by an SRO.

Roughly a third of law enforcement agencies had no parental notification policy. See page 20.

► **The reasons districts have an SRO is either not clearly stated or is problematic.**

- Six school districts had no discernible stated purpose for having an SRO program.
- Some school districts said SROs were there to serve as mentors or positive role models. Those are roles that teachers, counselors, coaches, and other staff already fill, without the potential negative consequences of having law enforcement involved.

Other districts said SROs are there to help law enforcement community relations, but it is not the job of schools to provide public relations for police. See page 14.

Key Recommendations for Action

This report also makes a number of policy recommendations for schools, law enforcement, and other leaders to take action. See page 28 for details.

► **Eliminate SRO programs.** First and foremost, Iowa schools should follow the lead of other districts, such as Des Moines and Ames, who have done away with their SRO programs altogether because of the many concerns spelled out in this report.

That said, if school and law enforcement insist on continuing their SRO programs, they should implement the following important changes:

► **Stricter training requirements** for SROs so they are better equipped to deal with the special requirements of dealing with children in a school setting.

► **More thorough reporting of SRO activities is critical** to make sure that SROs are interacting with students appropriately, are not over-policing students of color and students with disabilities, and are not escalating minor behavior problems into criminal offenses.

► **Measurable goals for an SRO program** with regular monitoring and evaluation of those goals.

► **Clear guidelines for SRO involvement**, determining when it is appropriate for an SRO to become involved in a situation.

► **Clear complaint procedures** so that parents, students, and others know how to express concerns about an SRO program at their school.

School Districts Included in This Study

The following public school districts were sent open records requests, submitted pursuant to Chapter 22 of the Iowa Code, for information about their SRO programs. All but two responded. No response was received from Central DeWitt or New London.

To see a listing of communities that were otherwise cited specifically in the report, [click here](#).

To see a U.S. Department of Education listing, if the data is available, for each district for referrals and arrests by race, [click here](#).

Documents from each district showing their responses to our open records request can be found online [here](#).

Adel De Soto Minburn	East Mills	Pella
AHSTW	Estherville Lincoln Central	Perry
Ames*	Fort Dodge	Pleasant Valley
Ankeny	Fort Madison	Riverside
Atlantic*	Glenwood	Sergeant Bluff-Luton
Ballard	Humboldt	Sidney
Benton	IKM-Manning	Sioux Center*
Bettendorf	Indianola	Sioux City
Bondurant-Farrar	Johnston	South Tama County
Boone	Keokuk	Southeast Polk
Boyden-Hull	Knoxville	Spencer
Burlington	Le Mars	Spirit Lake
Camanche	Linn-Mar	Storm Lake*
Cardinal	Maquoketa	Treynor
Carlisle	Marion	Tri-Center
Cedar Falls	Marshalltown	Underwood
Cedar Rapids	Mediapolis	Urbandale
Centerville*	Monticello	Van Meter
Central DeWitt	Muscatine	Vinton-Shellsburg
Central Lee	New London	Wapello
Cherokee	Newton	Waterloo
Clinton	North Cedar*	Waukee
College	North Polk	Waverly-Shell Rock*
Council Bluffs	North Scott	West Branch
Creston	Norwalk	West Des Moines
Dallas Center-Grimes	Okoboji	Wilton
Danville	Oskaloosa	Winfield-Mt. Union
Davenport	Ottumwa	
Dubuque	Prairie City-Monroe	
Durant	Pekin	

* Reported not having an SRO

National Overview of SROs

Police in schools present consistent problems across the country.

The spread and impact of SROs on schools in Iowa has taken place in the context of troubling nationwide trends.

National SRO data suggests that the number of SROs in schools across the country continues to increase, leading to more arrests and referrals. However, there is not any empirical evidence that this actually is making schools any safer.

A key source of national data is from the U.S. Department of Education's Office for Civil Rights (OCR). Every other year, it conducts a survey of all public local educational agencies (LEAs) and schools that receive federal financial assistance from the U.S. Department of Education.⁴ The most recent survey data released from the OCR covers the 2021–22 school year and contains data from 98,000 schools across 17,000 school districts that provide education services to more than 50 million students.⁵

No independent study has found statistically significant evidence that demonstrates that police presence in schools makes schools any safer.

Unfortunately, even though school districts are legally required to respond to this OCR survey, some do not.

Based on the data of those that did respond to the OCR survey, there is a continued prevalence of police presence in schools,⁶ over-representation of Black or African American students in disciplinary actions,⁷ and over-representation in suspension and expulsion of students with disabilities.⁸

Hiring Police Instead of Counselors

This national data also highlights a concerning prioritization to hire SROs over school counselors in some school districts. Despite years of reporting

on the adolescent mental health crisis and lack of desperately needed mental health staff in schools,⁹ there are still millions of students attending schools with a sworn law enforcement officer or security guard but without a counselor.¹⁰

The normalization of police in schools arose in response to increases in school shootings in the early 2000s.¹¹ Despite more police in schools, instances of gun violence in schools have continued to rise, more than doubling between 2018 and 2024.¹²

Since the turn of the century, researchers have been studying the effectiveness of school police in reducing violence, but no independent study has ever found statistically significant quantitative evidence to demonstrate that police presence in schools makes schools any safer.¹³

It's important to note that these police in schools are armed. Almost 100 percent of sworn SROs usually carried a firearm when working in their primarily assigned school.¹⁴ Additionally, 65 percent carry a taser.¹⁵

Despite decades of inconclusive evidence on school police and safety, and a rate of school shootings that continues to rise, police presence in schools has continued to increase over the last decade. SROs now are in more than 44 percent of schools as of 2022,¹⁶ and there was a 23 percent increase in the total number of SROs in schools from 2018 to 2021.¹⁷

SROs Do Not Keep Students Safer

Importantly, some evidence suggests that the presence of SROs is correlated to an *increase* in reports of safety-related problems at school.

A recent study on the effects of SRO program implementation in schools indicated that reported weapon- and drug-related offenses increased immediately after the employment of a new SRO.¹⁸ It also found that increased rates of weapon- and drug-related offenses stayed at elevated levels even years after the new SRO had been introduced.¹⁹

Another study identified significant increases in student arrests for disorderly conduct after school police were placed in schools.²⁰ The range of conduct that can be considered “disorderly” is wide and gives law enforcement significant discretion, which has resulted in criminalization of what may otherwise be considered standard student misconduct.²¹

When an SRO is hired, the number of student referrals and arrests often increases compared to when a school relied just on contacting local law enforcement when there was a problem.

What this national data clearly shows is that as the number of SROs increases, the number of arrests and referrals also often increases. Studies have shown that this increase in arrests and referrals is not the result of SROs detecting previously undetected problems, but instead that SROs are

becoming involved in low-level situations and escalating them into a law enforcement matter, sometimes with students as early as first grade. An example of this can be found in Ankeny. The school year before the district brought in an SRO, it reported no cases of student behavior deemed serious enough for a referral or arrest. But just a few years later, in the 2021-2022 school year, the district reported that the new SRO was involved in 85 referrals or arrests.

Ankeny: Before and After Its SRO Program	
Ankeny started its SRO program in 2018. The records indicate that prior to that, student behavior did not lead to law enforcement referrals or arrests. But just a few years later, once the SRO program started, in 2021-2022, the amount of law enforcement referrals and arrests for young people shot up significantly and concerningly.	
2017-2018 Arrests and Referrals	2021-2022 Arrests and Referrals
0	85

SROs In Iowa

Statewide data is similarly troubling compared to national statistics.

Many of the same trends and problems seen nationally with SROs are also occurring in Iowa. For example, the data indicates that Black students and students with disabilities in Iowa are also disproportionately being referred and arrested by SROs. Nationally, norms and perceptions about SROs continue to change. In Iowa, the climate in Iowa remains mixed. Two large school districts that historically maintained an SRO contract, the Ames Community School District and the Des Moines Independent Community School District, have opted to end their contracts and remove SROs from their district.²²

In contrast, numerous smaller school districts without a history of SRO employment have entered into new SRO contracts.²³ Recently, the Iowa Legislature pushed for a statewide increase in SROs. In 2024, the Iowa legislature passed House File 2586, a new law that recommends that every school district in the state employ at least one private security guard or SRO.²⁴ It also requires that every school district with a student population over 8,000 employ an SRO or security officer at every school serving students in grade nine or above, unless the school board for the district affirmatively votes to opt out.²⁵

How Many SROs are in Iowa?

It is difficult to pin down the exact number of SROs in the state, which is itself concerning because it indicates too little monitoring and accountability for SRO programs.

SROs: By the Numbers

- Estimates put the number of full-time SROs in Iowa at 130 employed in 78 districts.
- About one-fourth of all Iowa school districts have at least one SRO.
- About half of all Iowa students attend school in a district that uses SROs.

Data collected by the State of Iowa shows only 55 school resource officers employed across the entire state.²⁶ However, the national data and data collected for this report indicate that the number is a severe underreporting.

According to the national data released by the OCR, as of 2022 there were around 175 full-time law enforcement officers employed across Iowa schools.²⁷ The data included in this report provides a more accurate estimate for the 2025–26 school year of at least 130 full-time SROs across 78 districts, with these 78 districts accounting for 53 percent of all students across the state.²⁸

SROs More Likely to Discipline Black Students

The Iowa public school system serves more than 475,000 students across 327 school districts.²⁹ Since 2000, the racial and ethnic composition of the Iowa public school student population has changed significantly to become much more diverse.³⁰

This report examines the available statistics on how students are treated by SROs broken down by race and ethnicity and also by disability.

Disturbingly, the report found a severe over-policing of Black or African American students. This is despite studies indicating that Black students do not misbehave at a higher rate than other students.³¹

Our report also found that students with disabilities were far more likely to receive referrals or be arrested by SROs in Iowa schools.

Students of Color

As of 2024, students of color make up 28.5 percent of students enrolled in Iowa public schools.³²

► White students account for 72 percent of the student population, yet they make up only 65 percent of SRO disciplinary referrals and 56 percent of SRO arrests.³³

► Black or African American students³⁴ make up just 7 percent of the population but 13 percent of referrals and 21 percent of arrests.

► Hispanic or Latino students make up 12 percent of the population, 12 percent of referrals, and 9 percent of arrests.

► Asians account for 3 percent of the student population, 2 percent of referrals, and 3 percent of arrests.

► American Indian/Alaska native students make up a tiny portion of the Iowa student population at .35 percent; referrals for this group were at .86 percent and arrests at .64 percent.

► Native Hawaiian/Pacific Islander students also make up a small proportion of Iowa students at .39 percent, but their referrals were at 2.5 percent and arrests at 2.12 percent.

Students With Disabilities

Students with disabilities are also over-policed in Iowa, making up only 13 percent of the student population but accounting for 27 percent of SRO referrals and 26 percent of arrests.³⁵

Recent Trends in SRO Hiring in Iowa

The ACLU of Iowa has long advocated for police-free schools.³⁶ In response to the murder of George Floyd in 2020, some school districts in Iowa devoted new resources and attention to the critical issues of racial bias and disparities in the justice system, and how having armed police in schools creates some of those same harms for students.³⁷

In 2021, both the Ames Community School District and the Des Moines Independent School District voted to end their SRO programs, citing racial equity concerns.³⁸

At that same time, the ACLU of Iowa's Advocacy and Community Engagement team began a multi-year project, working with families and community members statewide to keep Iowa's students safe from the dangers caused by armed police in schools. In 2022, the ACLU of Iowa released a toolkit to facilitate community advocacy for police-free schools in Iowa.³⁹

This issue is challenging and tragic on many fronts. In 2024, the unthinkable happened in Iowa in Perry when a student committed a mass shooting at the local high school, killing two and physically injuring six others. This tragedy led to more Iowa schools considering adding armed police officers,⁴⁰ and was followed by a state law designed to increase the presence of armed guards or law enforcement personnel in schools.⁴¹

While the creation of an SRO program might be well-intentioned, the unfortunate truth is that no evidence supports the claim that more law enforcement personnel in schools creates a safer environment for students. However, evidence *does* show that putting police in schools creates a pipeline to funnel kids into the juvenile delinquency and criminal justice systems.⁴²

The consequences for over-criminalizing the behavior of children include significant and often lifelong trauma, alienation, and stigma that increase—rather than decrease—their risk of becoming an adult who becomes involved in the criminal justice system.⁴³ It also decreases—rather than increases—their likelihood of achieving

Disparities for Black Students & Students with Disabilities

Black students in Iowa make up 7 percent of the population but account for **21 percent of arrests**.

That means Black students are **arrested at nearly four times the rate of other students** even though studies show they do not misbehave at a higher rate.

Students with disabilities make up 13 percent of the student population, but account for **27 percent of SRO referrals** and **26 percent of arrests**.

That means students with disabilities are **referred or arrested at 2.3 times the rate of a student without a disability**.

educational and career success.⁴⁴ These harms are experienced at a disproportionate rate by Black kids and kids with disabilities.⁴⁵

For that reason, the ACLU of Iowa will continue our ongoing efforts to protect students and to protect their rights.

This report builds upon the invaluable body of work from the ACLU of Iowa and juvenile justice advocates across the state to curb the harmful effects of law enforcement presence in schools.⁴⁶

Methodology for This Report

Open records requests were sent to a total of 154 school districts and law enforcement agencies.

The core of this report is data collected from a series of open records requests to selected schools and law enforcement agencies throughout the state.

The ACLU of Iowa sent open records requests for information related to SROs to 87 Iowa school

districts and 67 associated police departments.

Iowa law provides everyone with this right to request, examine, copy, and publish public records held in the custody of government bodies, including schools and police departments.⁴⁷

Data collection was divided into two separate “rounds” of open records requests, each with different “waves” within each round.

School District Requests

School districts were the focus of the first round. In that first round, the ACLU of Iowa sent open records requests to 87 school districts across Iowa. These open records requests were sent in three waves and used a standardized request letter.⁴⁸

The first wave of 20 open records requests were sent in October 2024. The districts in the first wave were selected in consultation with the ACLU of Iowa’s Advocacy and Community Engagement team and primarily focused on districts that the team identified during their prior SRO-related work in 2022. The second wave was sent in August 2025 to 22 additional districts that were again selected in consultation with the ACE team.

The third wave of the remaining 45 requests were sent in September 2025 and attempted to fill in the gaps to ensure that all school districts in Iowa with an SRO, no matter how large or small, had been contacted. Those 45 districts were identified by cross-referencing the list of districts that reported in their 2021–2022 OCR submissions that they employed at least one SRO with the list of districts already contacted by the ACLU of Iowa in waves one and two.

A standardized request letter was used for all 87 requests.⁴⁹

Despite repeated attempts, two school districts never replied to our open records request: Central DeWitt and New London.

Law Enforcement Requests

Law enforcement was the focus of the second round. That second round of requests was sent in October and November 2025 to city and county law enforcement agencies that contracted with the school districts to provide SROs. The list of law enforcement agencies was compiled from the SRO Memorandums of Understanding (MOUs) provided by the school districts in the first round of records requests; 67 law enforcement agencies were contacted using a standardized request letter.⁵⁰

Four law enforcement agencies never responded to our open records requests: the City of Adel, the City of Carlisle, the City of Wilton, and the Mills County Sheriff’s Office.

Complete copies of all school district and law enforcement agency responses are on file with the ACLU of Iowa and are available online [here](#).

The report also draws on a wealth of academic studies related to SROs and publicly available government data, particularly information collected by the U.S. Department of Education Office for Civil Rights (OCR).

Problems With SRO Contracts

Schools are not following important state laws that make information about SRO programs publicly available.

Iowa law requires that to create an SRO program, a “28E agreement” between a school district and a local law enforcement agency must be filed with the Secretary of State.⁵¹ These agreements must be specific as to duration, purpose, costs, and methods.⁵²

As part of this requirement, school districts are required to create a formalized agreement, such as

a memorandum of understanding (MOU), with their contracted law enforcement agency.⁵³

However, this study found that many Iowa schools are not following that law. That is concerning because the process of filing these MOUs makes them then available to the public. And if no MOU is filed, the public is deprived of important insight into how their local SRO program is operated, monitored, and funded.

► Of the 78 school districts that replied to the open records request, three school districts—Bettendorf, Durant, and Keokuk—neither produced a MOU or an equivalent agreement nor had they filed one with the Secretary of State.

Over half the schools with SROs are not in compliance with Iowa law requiring SRO contracts to be filed with the state, depriving the public of important information.

In the case of Durant, the school did not produce a contracting document, but a MOU was provided by the Durant Police Department during a subsequent open records request.

In the case of Keokuk, the district said its MOU was lost. It was also unable to produce a copy of its operating agreement. Eventually, the Keokuk police department, after searching through its archive, was able to produce a MOU, which has not been updated since 2004.

In the case of Bettendorf, no MOU or an equivalent agreement was ever obtained from the district, the City of Bettendorf, or the Bettendorf Police Department.

► One district, the Cedar Falls Community School District, appears to be operating on an SRO agreement that expired in 2014 and has not been updated since.

In the absence of a MOU, it is unclear how these districts have structured their employment agreements for their SRO programs. None of these districts provided any information or policy that discussed the goals, role, or costs of their ongoing SRO programs.

► Of the other 75 districts that replied to our open records request, 15 have indefinite SRO contracts. All of these contracts contain termination provisions, but they are structured to renew annually and perpetually without update or modification. Some of these SRO agreements have not been updated in more than two decades. Because no renewal or update is required to sustain the agreement, it is unfortunately unclear to what extent the agreement is being monitored or followed.

► More than half of the school districts with SRO contracts are not in compliance with their filing requirements under Iowa law: Of the 75 districts that have up-to-date SRO agreements, only 35 have filed their agreement with the Secretary of State.

Inadequate SRO Program Stated Purposes

Districts are not clearly articulating their reasons for having an SRO.

In order for an SRO program to run effectively, it is important for schools and law enforcement agencies to have a clear, stated purpose for the program and to establish measurable goals to evaluate the program's success.⁵⁴ But our report found this often isn't the case.

To understand each school district's rationale for its SRO program, our public records requests asked each school district for all documents related to the goals and review process for its SRO program.

After all, Iowa law requires that SRO program MOUs explicitly state the purpose of the SRO program being created.⁵⁵ This is important because explicitly stating the intended purpose of the SRO program provides benchmarks that can be used to track the effectiveness and problems of the program, at least on its own terms.

There were six school districts that either unhelpfully stated that the purpose of creating their SRO program was to create an SRO program, or stated no purpose at all in their MOU or any of the other documents produced for this report. Those schools were Burlington, Marshalltown, Okoboji, North Polk, North Scott, and Pleasant Valley.

When a purpose was stated, the two most commonly stated purposes were the creation of a safe learning environment or school safety (72 percent of districts) and law enforcement (53 percent of districts).⁵⁶ Some of the other major goals that districts set out for their programs were providing educational services, increasing police integration into the school district, and general crime prevention.

Six districts studied state no purpose for their SRO program.

Concerningly, for some districts a stated purpose was for SROs to serve as student mentors and role models. But as spelled out in our Recommendations section, it's highly problematic for students to confide in and form friendships with SROs. SROs

Stated Reasons for SRO Programs

Below are the most common reasons districts and local law enforcement agencies gave for having an SRO program.

Stated Reason	Number of SRO Programs Citing the Reason
Create safe learning environment	57
Provide law enforcement	43
Improve safety, performance, well-being	21
Build community relationships	19
Provide educational resources	18
Prevent crime	17
Provide mentorship	14
Integration of school/community policing	12
Create atmosphere free from intimidation	8
Increase sense of belonging/respectful environment	5
Deal with active shooter	3
Reduce substance abuse	2
Reduce incident liability/property damage	1
Solve problems in schools	1
Reduce truancy	1
Use trauma-informed lens	1

are sworn law enforcement officers with the power to charge and arrest students, as well as their friends and family members. Additionally, in some recent cases in the media, Iowa SROs have engaged in inappropriate sexual behavior with students.⁵⁷

Some districts stated that a purpose of their SRO program was to improve law enforcement's community relationships and public perceptions. But with recent trends in the erosion of public trust in law enforcement, especially in communities that have historically been the victim of racially

A Case Study of Two Different SRO Program Review Processes

It's important that SRO programs are monitored carefully, but that process varies widely in Iowa. Here's a side-by-side comparison of two districts' policies.

Inadequate: Cherokee Community School District	Better: College Community School District
The chief of police, in consultation with the high school principal or designee, completes a performance evaluation of the SRO annually.	The SRO supervisor, in consultation with the superintendent and the school's principal, completes performance evaluations of each SRO during November of each school year.
To facilitate that evaluation, the district provides requested information and reports.	Thorough quarterly SRO meetings are held to assess effectiveness and improvement mechanisms for the SRO program.
	"Clearly defined key metrics" are maintained for ongoing program evaluation. This includes Student Interaction Data, interactions with SROs individually and in classes or grade levels. It also includes the results of those interactions, including ticketing, mediation, referral to services, and arrests.

or ethnically motivated violence and policing,⁵⁸ schools are not the proper forum for attempting to rehabilitate that image. For students who are mistrustful of law enforcement generally, the presence of armed law enforcement officers in their schools can significantly reduce the students' feelings of safety in school and also distract them

from learning,⁵⁹ which directly contradicts the district's core purpose of education.

It is not the role of schools to bring in law enforcement to help them with public relations efforts. Public relations is an improper purpose for an SRO program. Schools should instead focus on education and student safety.

Inadequate SRO Program Review

Schools and law enforcement do a poor job of monitoring and evaluating their SRO programs.

While the law requires schools to include an SRO program's intended purpose in their MOUs, it does not require schools to engage in any process to evaluate whether SRO programs are meeting those goals. This is problematic because without requiring a review process, there is no mechanism in place to monitor how effective an SRO program may be.

- Our study found that 25 of the 78 districts have

no review process at all.

- Six districts have policies for routine evaluations but make them optional.
- Three districts require an annual review but defer entirely to the contracting law enforcement agency to do so.
- Two districts conduct monthly reviews of SRO conduct and provide a more comprehensive review

on an annual basis.

- ▶ Another district does a comprehensive annual review then provides incremental quarterly updates.
- ▶ In total, only 37 of the districts conduct

performance reviews of the SRO program on at least an annual basis, though the detail and focus of these performance reviews vary widely from district to district.

SRO Programs Are Expensive

SRO programs can be pricey for both schools and the community.

The average cost of employing an SRO in Iowa is at least \$98,000,⁶⁰ based on the figures received from school districts for this report. That might not include benefits and other expenses. As a point of comparison, the average teacher wage in Iowa is \$66,655,⁶¹ and the average school counselor wage is \$70,015.⁶²

The cost of an SRO program is almost always split between the district and the law enforcement agency as part of a joint contract between a law enforcement agency and the school district.

The average cost of employing an SRO is \$98,000. The average wage of a school counselor, who can potentially prevent student behavior problems before they even happen, is \$70,015.

Some school districts bear as much as 87 percent of the funding burden,⁶³ while some other districts rely on the employing law enforcement agency to pay for the entire program.⁶⁴

On average, school districts foot the bill for around 58 percent of the total cost of the SRO program, including the cost of salary, benefits, equipment, and training. This nets out to school districts paying

\$57,005 on average per SRO. Many SRO programs receive government subsidies when they are started, but after those subsidies stop, SRO programs often end up being expensive for school districts.

Some districts rely on federal grant funding to subsidize their SRO program. The most prominent example of SRO grant funding is the COPS (Community Oriented Policing Services) Hiring Program (CHP) grant under the U.S. Department of Justice.⁶⁵ The CHP grant provides supplemental funding of up to \$150,000 to hire entry-level SROs over a 36-month period and up to 75 percent of a locality's annual cost.⁶⁶ To qualify for CHP funding, districts must enter into a MOU and commit to a regimen of standardized training for the duration of the grant.⁶⁷ The emphasis of this program is to encourage districts with limited funding to create an SRO program at a lower cost.

On average, schools pay for about half the cost of an SRO program, with the local law enforcement agency who employs the SRO paying the other half.

After the grant funding period ends, districts must assume those costs or find other funding, and are no longer subject to federal guidance and training requirements.

Minimal Training for Dealing With Children

Some SROs have no training to work with youth or in schools.

The role of an SRO typically requires a different set of skills than that of most other law enforcement agents, yet this study found that training for dealing with children in a school environment is minimal.

School districts often expect SROs to serve as mentors and educational resources—roles typically and more appropriately held by trained school teachers or counselors.⁶⁸

But most standard law enforcement agent training prepares officers to engage in law enforcement activity only for an adult population.

SRO work requires skills different from other law enforcement work.

This standard training lacks key elements that are necessary to fulfill the goals of an SRO program, which is not strictly law enforcement and instead focuses on children in a school setting.

To that end, specialized training should be required to prepare a law enforcement officer for the role of being an SRO. However, there is no standard state or federal requirement for specialized SRO training; each school district is left to itself to decide on the correct training for its SROs.

To understand the training required by districts around the state, our request asked for documents regarding the extent and nature of SRO training in their school district, including de-escalation training, whether the training takes place before the SRO is placed in the school, and/or whether the training is ongoing.

Most School Districts Don't Require Specialized Training for SROs

Most school districts do not require any training for their school resource officers, leaving the decision to the contracting law enforcement agency. This is concerning because while local law enforcement may have experience in preparing officers for

SRO Training Problems

- ▶ In some districts, **SROs have no special training for children** or school settings.
- ▶ **One-third of the districts** studied **have no requirements** for SRO training.
- ▶ Many districts simply leave it **up to local law enforcement** to determine what training their SROs must have.
- ▶ **Nearly half** of the law enforcement agencies in the study **had no policy at all** requiring SROs to receive training in dealing with children in schools.
- ▶ There is **no standard state or federal training requirement for SROs** in dealing with children in school settings, either for schools or law enforcement agencies.

general law enforcement practices, school districts have more expertise in developmentally appropriate interactions with children, education, and accommodating students with disabilities. Schools also are best-situated to know the exact range of issues they want addressed in their particular district and are well-positioned to recommend to law enforcement agencies the types of training that they would like their SRO to have.

▶ Our study found that 27 of the 78 school districts who responded possess no policy on required SRO training at all.

▶ We also found that 32 districts simply defer to the local sheriff's office or police department to determine the necessary training to properly prepare an officer to serve as an SRO.

► Only 18 of the 78 school districts require formal training as a prerequisite to employment in their school district.

Inadequate and Few Law Enforcement Policies for SRO Training

School districts often defer to law enforcement agencies as to the training requirements for SROs in their schools. Law enforcement agencies themselves generally have no formal policies regarding proper SRO training.

► Of the 62 law enforcement agencies that responded to our open records request, 26 maintained no policy at all on required training.

► Three law enforcement agencies have ambiguous policies stating that their SROs will take “all relevant training” or “may be required to attend training,” though no other policy provides clarity on what training is relevant or required.

► Another seven agencies lack a formal written policy on required training, but have an oral or informal policy for SRO training.

Nonetheless, law enforcement agencies often provide individual officers with SRO training on what is largely an ad hoc basis. And in some districts, SROs are not specially trained at all.⁶⁹

The most common form of SRO training, when it occurs, is the basic course from the National Association of School Resource Officers (NASRO), which has been taken by SROs in 38 of the 62 law enforcement agencies that responded to our request.

The NASRO basic training is a one-time, 40-hour program that teaches using the “NASRO Triad Model” for school policing. The Triad Model teaches SROs that their job is to serve three different roles inside of schools: “law enforcement officer, informal counselor/mentor, and public safety educator.”⁷⁰

The NASRO also offers a 24-hour advanced SRO course. But only five law enforcement agencies studied for this report require that their SROs take the advanced course. Four merely encourage it.

Other common training courses taken by Iowa SROs include the Iowa Association of SROs School Safety Training, Drug Abuse Resistance Education (D.A.R.E.) Instructor training, and ALICE active shooter response training.

Like all law enforcement agents in the state, SROs were previously required to take annual de-escalation and anti-bias training.⁷¹ However, a new 2026 Iowa law unfortunately removes the anti-bias training requirements for all law enforcement, including SROs.⁷² Police departments remain able to provide anti-bias training voluntarily.⁷³

Students Too Often Are Not Informed of Their Rights When Interacting with an SRO

A lack of understanding by students puts them at risk.

It’s an important part of our legal judicial system that anyone being questioned by a police officer understands their rights. This is especially true for students, who often do not know what their rights are,⁷⁴ even though both the federal and Iowa Constitutions ensure that students in schools do indeed have fundamental civil rights.⁷⁵

This study requested current policies and procedures describing how and when children

are notified by school staff or SROs of their constitutional rights, including but not limited to the right to legal counsel,⁷⁶ the right against self-incrimination,⁷⁷ and the right to be free from unlawful search and seizure.⁷⁸

Our findings raise concerns that the rights of Iowa students of all ages are not being adequately protected when interacting with an SRO.

With older students, it’s important to inform

them of their rights when interacting with an SRO, using language that is easy to understand and age-appropriate. However, it's still important that parents or guardians be present since even older students are unlikely to understand the importance of the situation and their right to protect themselves.

Younger students are much less likely to understand and exercise their rights when interacting with an SRO. It's therefore essential that the parents of young students be notified and have the opportunity to step in before any potential SRO questioning.

School Districts Seldom Adequately Protect Students Rights with Police

Of the 78 school districts that responded to our open records request, only two provided a procedure or policy on how students are advised of their rights before being questioned by law enforcement, either by an SRO or law enforcement generally.

Only 3 percent of school districts provided policies for informing students of their rights when being questioned by an SRO.

Most school districts maintain a policy on proper search and seizure conduct. However, none of these policies or any other document provided by a school district stipulated whether or how students must be advised of their rights against unlawful search or seizure.

District search and seizure policies were usually available on the school district's board of directors website and sometimes included in the student handbook. Whether students are otherwise notified of their district's search and seizure policy is unknown.

Law Enforcement Policies Fall Short In Advising Students of Rights When Interacting with an SRO

Of the 62 law enforcement agencies that responded to our public records request:

- 19 provided no policy on notification of constitutional rights for students when interacting with an SRO.

- 15 law enforcement agencies did not provide a specific policy for SRO interactions, but instead pointed us to their "standard juvenile policy." Most of these related to the procedure for notifying students of their rights and the proper waiver of those rights during a custodial interrogation.

- 23 agencies maintained an SRO-specific policy on when and how students are to be advised of their rights. Most of these agencies provided guidance only in the context of "custodial interrogations."

Custodial interrogations are questioning or other conduct by law enforcement, when a person considers themselves in custody, that is reasonably likely to result in a person giving an incriminating response.⁷⁹

While the federal constitution requires that any waiver of the right to counsel be "voluntary, knowing, and intelligent"—which courts find logically would require parents' help for many children in many circumstances—it does not expressly require parental notification.

This leaves it up to individual states to set their own specific rules for juvenile interrogations that comply with this constitutional standard.

Iowa law defines the custodial situation in which a child must be provided with counsel more specifically than the "custodial interrogation" definition provided above. Iowa law specifically includes any time a "child is taken into custody for any alleged delinquent act that constitutes a serious or aggravated misdemeanor or felony under the Iowa criminal code."⁸⁰

In these cases, a child's right to counsel can be waived only by either parental consent for children under age 16 or after good-faith efforts to notify parents for children age 16 or older.⁸¹

Additionally, in a school environment, where all students are told they are required to stay at school and shouldn't leave, it can be difficult for a student to determine whether a student is "in custody" versus being "free to leave."⁸²

Furthermore, because SROs are often trying to play a problematically dual role of mentor and law enforcement agent,⁸³ it may be difficult for a student to determine if the SRO is questioning them for

guidance purposes or as a custodial interrogation.

This is a fundamental problem with having SROs in schools. At the very least, SROs should provide students with a clear and understandable explanation of their rights any time that officer of the law is questioning a student about an incident. But the younger the student, the less likely that child is able to understand the concept of their constitutional rights.

Parents Notified Too Little and Too Late

Many districts and law enforcement agencies fail to notify parents when their child has been confronted by school police.

When an incident with a student is serious enough to involve an SRO—a sworn police officer—the district should immediately notify a parent or guardian. However, many school districts currently do not have sufficient policies in place to notify parents when their student is confronted by an SRO.

It can be extremely confusing and stressful for a student to be confronted and interviewed by an SRO at school.⁸⁴ In addition, an interaction related to a disciplinary or criminal matter may lead to serious long-term consequences.⁸⁵

That's why this study sought documents from districts and local law enforcement regarding parent or guardian notification when a student is referred to any law enforcement officer, including an SRO.

Under Iowa law, when a juvenile is taken into custody, the person taking the child into custody is required to "notify the child's parent, guardian, or custodian as soon as possible."⁸⁶

Many school districts do not have sufficient policies in place to notify parents when their student is confronted by an SRO.

But too often school districts and law enforcement agencies maintain no policy on notifying parents when a student is in custody, whether for questioning related to a delinquent or criminal act or some other basis. This creates too much ambiguity that invites a possible violation of the student's rights under Iowa law.

Few and Vague School Policies on Parental Notification

Of the school districts that provided a response to our information request:

- 35 districts provided no policy for notifying a parent or guardian when their child has been confronted or interviewed by an SRO.

- Two provided ambiguous notification policies that varied depending on the conduct, but failed to indicate the particular instances in which parental notification is warranted.

- One district's policy is to defer to the SRO's contracting law enforcement agency to develop the policy for parental notification.

- The remaining 39 districts provided documents regarding their parental notification policies, many of which were standardized model policies from the Iowa Association of School Boards.⁸⁷ Of these 39 districts, most policies require parental notification

as soon as possible, which may not be prior to the student being interviewed.

- Seven districts explicitly require parental notification prior to the student being interviewed.

Law Enforcement Policies on Parental Notification Also Are Inadequate

Of the 62 law enforcement agencies that responded to the request:

- 21 produced no policy for notifying a parent or guardian when their child had been confronted by an SRO.

- 13 law enforcement agencies maintain a policy about parental notification by SROs.

- 21 agencies do not maintain a policy specifically for SROs, but instead produced standard juvenile policies that require parental notification.

- At least one law enforcement agency has a policy requiring parental notification, but told us it did not, raising a concern that it lacked a basic awareness of its own policy.

In one letter to us, the Newton Police Department indicated that it possessed no records of a policy related to parental notification when a student is referred by school personnel to law enforcement. However, in response to a different request, they produced their juvenile policy, which requires that the officer notify a minor's parent, guardian, or custodian as soon as possible when the child is taken into custody.⁸⁸

This implies strongly that under this policy, parents would not be notified when a school calls the police or SRO about a student and that instead, parents would be notified only at the point where police or the SRO considered the student "in custody." That is a large gray area most parents would not be comfortable with.

Disturbingly, some law enforcement agencies' parental notification policies, which would also cover an SRO, authorize interrogations that may violate state law regarding right to counsel for young people under the age of 18.

Under Iowa law, a child's "right to be represented by counsel . . . shall not be waived by a child less than 16 years of age without the written consent of the child's parent, guardian, or custodian."⁸⁹ For a

teen age 16 or 17, their right to counsel may only be waived "if a good faith effort has been made to notify the child's parent, guardian, or custodian that the child has been taken into custody and of the alleged delinquent act for which the child has been taken into custody . . ."⁹⁰

Some law enforcement policies that would cover an SRO may violate state law assuring the right to counsel for people under 18.

City police departments and county sheriff offices have discretion to determine the best way to implement juvenile interrogation policies that comply with Iowa law. Developing a comprehensive code of conduct for a law enforcement agency is a heavy lift, and as a result most law enforcement agencies in Iowa have adopted a standardized juvenile policy produced by the company Lexipol.⁹¹ The Lexipol policies provide that if "a juvenile is taken into custody, the officer shall notify the juvenile's parent, guardian or custodian as soon as possible,"⁹² but it also states that "[n]o interview or interrogation of a juvenile should occur unless the juvenile has the apparent capacity to consent, and does consent, to an interview or interrogation."⁹³

These guidelines require parental notification in the event that a child is taken into custody, which is consistent with Iowa law. However, they are inadequate because they allow for a child that may be below the age of 16 to consent to an interrogation, and potentially waive their right to counsel, without the proper consent of their parent or guardian.

By contrast, some law enforcement agencies require, absent urgent circumstances, that if parents of a child under the age 16 are willing to grant permission for their child to be interviewed, they have to fill out a waiver of rights form first. This policy ensures compliance with state law regarding parental notice and waiver of counsel.

Mom Not Notified Until After Daughter Is Interrogated by SRO Threatening “Distributing Child Pornography”

**“A child should not be
manipulated and interrogated
with no parent present.”**

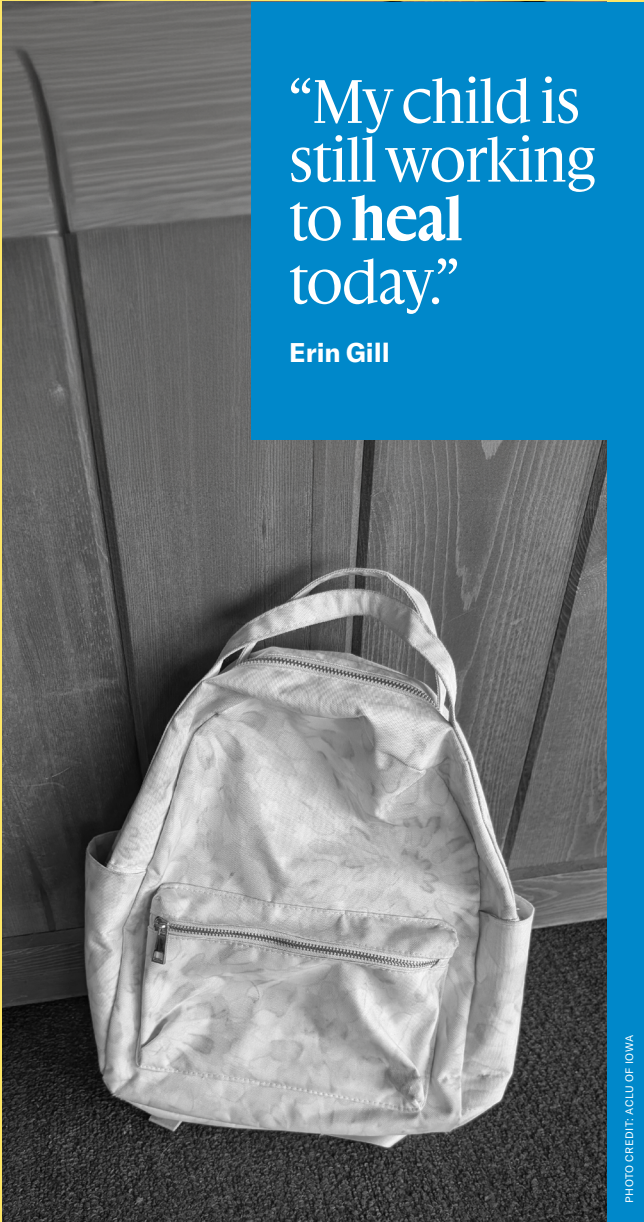
Three years ago, Erin Gill got the call no parent wants to get from her daughter’s school. The SRO at West Des Moines Valley Southwoods told her he had her daughter in custody and that he wouldn’t release her until he talked with Gill.

Gill rushed to the school but at first wasn’t allowed to see her daughter, who at the time was 14. The SRO said that her daughter had “distributed child pornography” and that Gill needed to order her daughter to give him access to her phone.

Gill, panicked, said she complied immediately. But as the facts unfolded, she became angry that her daughter had been interrogated by a sworn police officer without her knowledge or consent.

Further, Gill says the SRO told her daughter





“My child is still working to heal today.”

Erin Gill

The backpack Erin's daughter wore her freshman year.

untrue things to squeeze more details out of the teen and wrongly threatened her daughter with charges of child pornography distribution and being on a sex offender list for the rest of her life.

“A child should not be manipulated and interrogated with no parent present,” says Gill.

It turned out that a friend had sent Gill's daughter a graphic video of the friend and her boyfriend having sex. When Gill got the video via Snapchat, she was in class.

Caught off guard, she told a boy in the class that she'd just gotten the video. The boy grabbed her

daughter's phone against her wishes and then took a recording of the video and shared it with others, Gill says. “My daughter didn't do anything wrong.”

The SRO never found the video on the phone since Snapchat deletes information after a short period of time, Gill says. The only evidence that remained on the phone was that the friend had sent her daughter a video.

Regardless, as part of a diversion program her daughter had to attend “restorative justice” sessions two times a week, which included drug testing and a requirement to get better grades.

“Having an SRO handle it makes it a police matter right off the bat.”

“That part puzzled me,” Gill said. “What does getting good grades have to do with it?”

Gill said there were better ways of handling the situation. “It was the kind of thing where it should have been the school that stepped in and talked to students to find out what happened and not start immediately threatening child pornography charges and sex offender lists for life. But having an SRO handle it makes it a police matter right off the bat. The school, maybe a counselor, should have involved the parents of the students directly involved with the goal of finding out how we can keep these kids safe, not how we can punish them.”

“As a parent you place trust in the adults of your child's community, especially at school. When this adult SRO took advantage of their authority to harm my child during a vulnerable moment without her caregiver present, it was not only shocking and upsetting; it started a cascade of events with a resulting trauma and shame my child is still working to heal today.”

Unclear Processes for SRO Complaints

Giving feedback about SRO programs or misconduct can be confusing.

Maintaining a complaint process specifically for an SRO program is an important way for SROs and school administrators to get feedback from students, parents, and the community.

To that end, the school districts in this study were asked to produce any and all documents regarding the process for students and parents to express concerns about SROs.

None of the districts studied have a complaint process specifically for problems with an SRO.

Disturbingly, of the 78 districts responding to our survey, no district produced a complaint process specifically for their SRO.

- 38 districts indicated that they have no policy or process at all for students or parents to raise complaints about SROs.

- Two districts said that they do not possess a policy to address SRO complaints and that these

complaints should instead be referred to the employing law enforcement agency.

- 38 districts provided documents detailing general policies for receiving complaints about their SRO program, which may be submitted through a general complaint process. Most of these districts pointed us to their general complaint and grievance policy, based on a model from the Iowa Association of School Boards.⁹⁴

However, because many of the SRO MOUs explicitly state that the SRO is not an employee of the school district, the general school complaint process does not apply. In those cases, having the same complaint process for school employees and for law enforcement–employed SROs is a problem.

This lack of a meaningful process to complain about SROs flies in the face of guidance from national law enforcement organizations.

Guidance from the U.S. Department of Justice encourages law enforcement agencies to listen to the concerns in their community and to maintain open lines of communication with the community,⁹⁵ and an SRO-specific complaint process is integral to that.

The Shortcomings of SRO Record Keeping and Data

Data from the OCR provides meaningful high-level statistics that can be used to identify broader trends about SROs, but it does not provide detailed information on individual incidents.

We addressed this shortcoming in our open record requests sent to law enforcement by asking for the reasons that students are referred to SROs during the August 2024–May 2025 school year, separated by race, sex, disability status, and any other demographic information of the student. But of the law enforcement agencies contacted, 12 produced no data on arrests by their SROs.

Another shortcoming of the OCR data is that it is only useful so long as school districts are accurately reporting their number of arrests and referrals.

As a part of the open record requests sent to school districts, we requested that school districts provide their most recent two submissions, regarding school discipline to fulfill their obligation under the Civil Rights Data Collection (CRDC) biennial survey required by the OCR.

Every school district we contacted confirmed that they properly filed their CRDC data for the last two cycles. However, we are unable to vouch for the accuracy of the data submitted.

In looking at the 2021–2022 CRDC data, many districts report no law enforcement referral or arrest. It is possible that these submissions of referrals and arrests are accurate. However, it is also possible that arrests and referrals are indeed happening in these districts, but no records of these arrests and referrals are being kept by the school district—and therefore are not being reported to the OCR.

Black Students and Students With Disabilities Are Penalized at a Higher Rate

Not all children are treated equally by SROs.

A key concern about SROs nationally is that they disproportionately refer and arrest Hispanic or Latino students, Black or African American students, and students with disabilities.⁹⁶

That appears to be the case in Iowa as well and certainly is true in some districts, but unfortunately, SRO referral and arrest data that is both comprehensive and accurate is hard to come by.

Most school districts and law enforcement agencies do a poor job of tracking SRO referrals and arrests generally. They are even worse at keeping records that can be categorized by race—which is critical for monitoring an SRO program and detecting racial disparities.

Some of the districts with SROs that we surveyed reported zero arrests and referrals in

Iowa Districts With Notably High Percentages of Black Student Referrals and Arrests

Even though school districts are legally required to report referrals and arrests, broken down by race, to the U.S. Department of Education Office for Civil Rights, many districts decline to do so. Of the Iowa districts that reported to the OCR, below are those with the most stark racial disparities.

District		Referrals		Arrests		Referrals & Arrests	
District	Black Student Percentage of Population	Percentage of Black Student Referrals	Referral Over-representation	Percentage of Black Student Arrests	Arrest Over-representation	Percentage of Black Student Referrals and Arrests	Both Arrest and Referral Over-representation
Ottumwa	7%	14%	7%	16%	9%	14%	7%
Sioux City	8%	16%	8%	28%	20%	18%	10%
Fort Dodge	7%	15%	8%	19%	12%	17%	10%
Dubuque	10%	19%	9%	33%	23%	20%	10%
Ankeny	4%	14%	10%	0%	-4%*	14%	10%
Waukee	6%	15%	9%	40%	34%	17%	11%
Cedar Rapids	19%	29%	10%	46%	27%	34%	15%
Norwalk	2%	19%	17%	11%	9%	18%	16%
Johnston	9%	39%	30%	0%	-9%*	38%	29%
Bettendorf	9%	41%	32%	40%	31%	41%	32%
Waterloo	27%	71%	44%	69%	42%	70%	43%

*This number is negative because Ankeny and Johnston reported no arrests of Black students.

Source: U.S. Department of Education, Office for Civil Rights

their 2021–2022 CRDC data submission: Ballard, Bondurant-Farrar, Boyden-Hull, Cardinal, Cedar Falls, Central Lee, Creston, Dallas Center-Grimes, Danville, Davenport, Durant, East Mills, Glenwood, IKM-Manning, Keokuk, Marion, Mediapolis, North Polk, North Scott, Oskaloosa, Pekin, Pleasant Valley, Riverside, Sidney, Treynor, Tri-Center, Underwood, Van Meter, Wapello, West Branch, West Des Moines, Wilton, Winfield-Mt Union.

Of the remaining districts that did report referrals and arrests to the OCR, the data confirmed a disproportionate impact on Black students.

Black students in Iowa make up just 7 percent of the student population but account for 13 percent of referrals and 21 percent of arrests in the districts studied, even though national studies indicate that Black students do not actually misbehave or commit crimes in schools at a higher rate.⁹⁷

Students with disabilities make up 13 percent of the student population, but account for 27 percent of SRO referrals and 26 percent of arrests.

Of the districts that kept track of SRO referrals and arrests by race—compared to the districts who improperly failed to report those numbers—some stood out in their high rate of referrals and arrests of

Black students. The table on the next page identifies the school districts with the highest rates of over-policing of Black students.

For the sake of Iowa kids in our schools and the principles of equality and freedom central to our democratic system, we must address these unfair disparities. They systematically divert students from their community and into the delinquency and criminal systems, with lifelong consequences.

These disparities feed the school-to-prison pipeline—the funneling of children out of public schools and into the juvenile and criminal justice system, often for minor infractions and routine disciplinary issues.

As these children then age into adults, the disparities continue as kids age into adults, as reflected in disproportionate stop, arrest, and imprisonment of Black people in Iowa and nationally.

That is why, ultimately, getting SROs out of schools is an essential part of the reforms needed to tackle this problem. Barring that, major reforms like those suggested later in this report are required so that this problem is acknowledged as serious and is addressed.

The Reasons for SRO Referrals and Arrests

Vaping, conflicts with other students can result in police involvement.

A continuing concern about SROs in schools is that normal developmental behavior by children and teens is more likely to result in law enforcement action and punishment.⁹⁸

Studies repeatedly have found that SRO programs lead to law enforcement involvement in ordinary school discipline that would traditionally be handled by teachers or other staff.⁹⁹ SRO programs also result in an overall increase in instances of student discipline.¹⁰⁰

For this report, we asked school districts and law enforcement to give us information about student referrals and arrests. The information given varied widely in breadth and detail. Some districts

provided the number of referrals categorized by demographic characteristics, such as race and gender. Other districts provided only single line-item descriptions on a spreadsheet for each referral. Only a few districts provided complete incident reports, with confidential information redacted.

We found that some reasons for SRO referrals and arrests, such as allegations of sexual assault and possession of a weapon, are indeed serious allegations traditionally handled by law enforcement and not by schools through normal disciplinary measures. However, we also saw that the increase in student discipline by SROs has overwhelmingly been driven by low-level offenses or school

Low-Level Offenses by Children That Become a Law Enforcement Matter

When SROs get involved, it can escalate consequences of typical childhood behaviors.

While many of the schools district studied did not report SRO referrals and incidents in detail, a handful produced more complete incident reports. These shed light on the many low-level offenses SROs routinely and problematically become involved in. Some of them included:

First- and Second-Grade Aged Students Misbehaving

In Perry, in two separate incidents, the SRO was called in to handle a 7-year-old boy “who was running through the hallway and becoming agitated with staff.” In another, the SRO intervened because a 6-year-old was “throwing objects and trying to destroy classroom and started being physically disruptive destructive and disruptive.”

10-year-old Kicking a Ball, Shaking A Climbing Net

In Pella, a mother met with the SRO and school principal to complain about a 10-year-old boy’s behavior toward her 9-year-old daughter, who has mental and physical disabilities and recently had eye surgery.

In one incident, the boy kicked a ball that hit the girl in the face. School officials said there was no evidence that the ball-kicking at the girl was intentional, and no injuries were listed in the incident report.

The SRO’s report also detailed how the girl was on a climbing net and the boy shook the net, allegedly to make the girl fall off. She did not fall off.

From the incident report, it appears the boy was brought into a conference room with the SRO, with

no parents mentioned, and questioned. Charges were not filed and in the end, the SRO said he would be talking with the principal, “and we will be letting the school decide” how to handle the situation for both students.

Boy Taking Popcorn

In Sioux City, it was reported that a teenage boy took a bag of popcorn as he was leaving school and did not pay for it. His guardian was contacted and advised if they boy did not bring \$5 next day for the popcorn, he would be charged with theft. The boy was able to bring \$5 the next day.

Four Teenagers Egg a House

Also in Sioux City, four 14-year-old boys egged a house, which obviously was not on school grounds. The SRO records are unclear, but indicate that the boys were investigated and possibly even charged with criminal mischief.

Teens in a School Building After Designated School Hours

In Boone, two teenagers were reported by the school secretary as being in the school building after school hours. Nothing was reported missing and no other inappropriate behavior was reported. They were questioned by the SRO and eventually released and cited for trespass.

code-of-conduct violations, which would be otherwise and better resolved through the school's disciplinary system, without law enforcement intervention.¹⁰¹ A prime example is an SRO

SROs are routinely involved in low-level offenses, such as vaping, that could be handled by staff.

getting involved because of students vaping nicotine, which accounts for many of the incidents reported.

A review of incident reports also shows that SROs routinely are becoming involved in minor offenses, such as students pushing other students, calling each other names or spreading rumors, being “disrespectful” in class, and even “drama with a group of girls.”

Of the law enforcement agencies that we surveyed, 50 produced documents that track arrests and referrals by SROs, while 12 produced no records of SRO arrests or referrals. However, many SRO

MOUs specify that SROs must keep detailed, non-confidential records of their activities.

Of the 12 law enforcement agencies that did not produce any records of SRO arrests or referrals, six actually had MOUs that contain a requirement to keep detailed records. This put them in violation of their own MOU contracts. Those law enforcement

Some law enforcement failed to produce records detailing student referrals and arrests that they are contractually required to keep.

agencies violating their own MOUs regarding detailed record keeping were: Cedar Falls Police Department, Creston Police Department, Oskaloosa Police Department, Ottumwa Police Department, Van Meter Police Department, and Lee County Sheriff's Office.

Recommendations for Action

Short of getting rid of SRO programs, school districts and law enforcement must take action to mitigate the adverse effects of putting armed police officers in schools.

The very best way to prevent the harms that SRO programs create for students is for districts to simply end school resource officer programs. Therefore, our top recommendation for community and city leaders moving forward is:

1. End School Resource Officer Programs

The evidence shows that routine policing in schools by SROs runs counter to the goal of creating and maintaining a safe learning environment for students.

SROs are sworn law enforcement officers. Because of that, there is an inherent danger of students at

school being treated less like the children and teens that they are and more like criminal suspects. SROs don't check their arrest authority at the schoolhouse door and that puts kids at risk.

SROs are also problematically assuming roles traditionally and rightly filled by teachers, counselors, school psychologists, and other staff, including being mentors and serving as a “trusted adult” to hear out a student's problems.

But having an SRO assume the role of “trusted adult” for students is a problem since they also have the power to charge and arrest students, their friends, and family members.

SROs are also taking over teaching topics such as education on drugs and alcohol and conflict

resolution that traditional school staff are well qualified to teach.

It's important to note that any decreased reliance on SROs should be accompanied by an overall caution generally in referring students to law enforcement for matters that should otherwise be resolved by the district's normal educational and disciplinary systems. When law enforcement of any sort is expected to provide safety-related services to a district, they should only do so to address a specific public safety concern.

We don't want to suggest that school staff have abdicated their responsibilities to students. Instead, it is school and community leaders who chose—and continue to choose—to rely on police in schools, even as the evidence mounts each year demonstrating the harms of SROs.

These leaders choose to continue SRO programs even as other school districts discontinue their programs because of those harms. Tragically, school leaders who continue to allow SRO programs are feeding Iowa's school-to-prison pipeline. This harm is falling unequally on Iowa's Black kids and kids with disabilities.

While the best solution is to follow the lead of other Iowa schools and to end SRO programs, if district officials insist on continuing an SRO program, there are several measures they must take to protect the children entrusted into their care.

2. Ensure Consistent SRO Program Assessment and Review Processes

If a district chooses to continue its SRO program, it must make sure that the program has clearly stated goals and that the program is regularly reviewed.

- In order to assess the effectiveness of an SRO program, each school district should explicitly define the purposes of their SRO program and establish metrics to evaluate those goals.

- School districts should adopt policies that require SROs to keep detailed records of their activities and those detailed records should be reported to schools on a monthly basis.

- Every school district with an SRO agreement must commit to a meaningful, independent, and public review of the program in its entirety at the

end of each school year, with particular attention being paid to disproportionate impacts on students of color and students with disabilities.

This annual program review should also include the development of a program improvement plan to be implemented before the next school year begins.

This is critical, so that administrators and families are aware of what's happening when police patrol school hallways and so that schools can provide necessary oversight of SRO policies and practices.

- Additionally, since SRO programs are predominantly paid for with public funds, program improvement plans and other non-confidential reports generated in the course of the program's routine review process should be made available to students, parents, and the public.

At the very least, SRO arrest and referral data should be made readily available by each school district—which shouldn't be a heavy lift, considering that this is data that they should already be collecting for the OCR.

3. Update SRO MOU Requirements to Comply With Best Practices

A MOU is a district's blueprint to ensure that the SRO program has clear direction on how to serve the best interests of the students under the school district's watch as well as the community as a whole. The MOU is an important starting point for determining what exactly those interests are, for setting standards, and making those standards public and enforceable.

Examples of such requirements include detailed record keeping, frequent program reviews, defining mandatory training, and prohibiting racial profiling.

Additionally, school districts with perpetually renewing MOUs should establish durational limits of the SRO program. As the evidence from this report indicates, SRO programs have a serious impact on students.

In school districts with fewer than 8,000 students—the vast majority of districts in the state—Iowa law still allows them to treat SRO programs as opt-in programs, not opt-out, and contract renewal terms should reflect that.

In the 11 Iowa school districts larger than 8,000,

Iowa law requires the school board to vote in order to opt out of an SRO program.¹⁰²

But contracts can still lawfully limit how long those contracts are valid. These durational limits should be for short periods of time. SRO contracts should also require annual re-evaluation based on a careful assessment of the SRO program's success or lack of success as well as the program's unintended harms.

SRO programs have serious and lifelong consequences for students. School districts shouldn't treat them like a streaming service and casually set them to auto-renewal.

4. Standardize SRO Training Requirements

To ensure that school resource officers are better prepared to interact with children in a school environment, a standardized set of minimum training requirements for SROs must be established.

- SROs should be required to receive training on de-escalation techniques and prevention of bias. Training on these topics should be specifically tailored to children and teens in a school environment.

- SROs also should receive training on students' civil rights—what those are and how to protect them rather than evade them.

- SROs should be trained on adolescent development, mental health, and disability sensitivity.

- School districts must assume more responsibility for SRO training requirements. Many school districts simply defer to local law enforcement to determine what type of training their SROs have.

But school district officials and school board members are not simply observers. They are management. Their decision to bring armed police into their schools is a serious one and the districts themselves must take responsibility for that.

If a district decides to allow an SRO program, it must be the district itself that determines the type of training required for the SROs it employs.

That SRO training should include any mandatory training that school districts require of their other employees who are in similar roles.

5. Establish Explicit Conduct Guidelines for SRO Referrals

Clear guidelines must be established to govern when a matter is to be referred to an SRO. They should include:

- Specifying that issues that can be addressed by the school district should be resolved without law enforcement involvement.

School districts should have a disciplinary guide that explicitly draws a line between matters that arise from normal student behavior or a school rule violation—which should be resolved by school district staff—and matters that are a serious juvenile delinquency or criminal matter, which could allow for outside intervention.

- Creation of robust internal crisis plans that prioritize de-escalation in the event of law enforcement involvement.

- Creation or clarification of policies to guide SROs on interviewing or questioning any student, and to require that administrators are aware of their obligation to protect students' legal rights.

- Requiring that a student's parent or guardian be contacted before an SRO interviews, questions, or formally or informally interrogates a student.

- Making sure that students are informed of their rights when confronted by an SRO, in a manner that is understandable and meaningful for a student, based on their age, language, and abilities.

This should include informing them that they may not be interviewed, questioned, or interrogated without the consent or presence of the student's parent or guardian.

6. Make Sure the SRO Complaint Process is Clear and Easily Accessible To Students and Families

SRO programs across the state do not have clear mechanisms for collecting and acting on feedback from students, parents, educators, and the community. This must change.

Many law enforcement agencies place an emphasis on using their SRO program to improve the relationship between law enforcement and the community. Regardless of whether that is an acceptable

use of an SRO program, it necessitates a clear mechanism for receiving feedback from the community. A formalized complaint process specific to SROs provides that mechanism.

In a school setting, the chain of command for an SRO is different from that for any other school employee. This is confusing for students, parents, and others when attempting to relay concerns about a school district's SRO program through the district's standard complaint process.

To alleviate this confusion, school districts should work with their local law enforcement agency to establish a separate complaint mechanism specifically

designed for feedback on their SRO program. That mechanism should be readily accessible to students and parents through the school.

The feedback received should then be reviewed frequently by the SRO with their district and law enforcement supervisors. Additionally, to mitigate the potential for intimidation, people expressing their concerns should have the option to submit their complaints anonymously.

To reiterate, it's important to note that districts can avoid having to take all the precautionary and remedial measures listed above simply by not having an SRO program.

Glossary of Terms

28E Agreement: In order to create an SRO program, Iowa law requires a 28E agreement between a school district and a local law enforcement agency. By law, it must be filed with the Secretary of State. These agreements must be specific as to duration, purpose, costs, and methods. School districts are required to create a formalized agreement, such as a memorandum of understanding (MOU) with their contracted law enforcement agency to satisfy these requirements.

Arrest: An arrest occurs when a student is detained by law enforcement, with or without the use of handcuffs, and removed from the school setting to be processed for criminal charges.

Citation: An offense that does not involve an arrest but usually requires instead paying a fee or making a court appearance, as with a traffic ticket. Common with vaping incidents.

Custodial interrogation: Questioning or other conduct by law enforcement, including an SRO, when a student or other person considers themselves in custody, that is reasonably likely to result in a person giving an incriminating response.

Diversion program: An option used by school districts and law enforcement as an alternative to pursuing criminal charges.

These programs are often run in association with local law enforcement. They usually consist of a series of out-of-school classes or sessions in which students are lectured on various topics ranging from the risks of tobacco use to dating to cell phone or social media use and sexual education; may require community service, drug testing, or other forms of surveillance; and may require that certain unrelated benchmarks be met, like “better grades.”

While diversion programs have their place in appropriate circumstances, they can become highly coercive to kids and families, often requiring students to complete the program to avoid juvenile delinquency charges being filed.

Diversion programs may contain “educational” content that parents object to or be held by churches with beliefs that may not align with those of students and their families.

MOU: A memorandum of understanding, which serves as a formalized agreement between a school district and a local law enforcement agency specifying the terms of SROs employment, including duration, purpose, costs, and methods.

NASRO: National Association of School Resource Officers

OCR: The U.S. Department of Education Office for Civil Rights

Referral: When a school employee reports a student to an SRO or other law enforcement officer to address a perceived problem on school grounds. It covers a wide variety of interactions, everything from an inquiry on the well-being of the student to questioning the student about their or others’ actions involving anything from vaping to a fight.

It may or may not result in a disciplinary action against the student, such as required attendance at a diversion program, a citation, or an arrest.

Restorative justice program: An alternative to any involvement of law enforcement in student disputes. However, confusingly, the term can also be used by law enforcement, including juvenile delinquency officers, in diversion programs, which happen typically only after law enforcement has taken over a matter from a school.

It seeks to promote student-to-student conflict resolution with the use of a trained conflict mediator. Currently in use in a few Iowa school districts with programs that vary widely.

School Security Officer: A school staff member or private contractor responsible for maintaining an orderly school environment. Not local law enforcement and does not have the power to arrest. May or may not carry a gun and other weapons.

SRO: School resource officer. Sworn police officer deployed full or part-time in one or more local public schools. Is almost always armed with a handgun and sometimes a taser. Has the power to arrest. Employed by the local police or sheriff's office. The salary and expenses of an SRO is usually shared between the district and the law enforcement agency. May or may not have specialized training.

SRO incident report: A record of referrals, disciplinary actions, citations, or arrests filed by an SRO. Varies widely depending on the district and law enforcement agency.

Endnotes

- 1 For examples of works from ACLU National addressing the effects of law enforcement in schools, see, e.g., ACLU, *Cops and No Counselors: How the Lack of School Mental Health Staff Is Harming Students* (2019) [hereinafter ACLU, *Cops and No Counselors*]; ACLU, *Bullies in Blue: Origins and Consequences Of School Policing* (2017); Catherine Y. Kim & I. India Geronimo, ACLU, *Policing In Schools: Developing A Governance Document For School Resource Officers In K-12 Schools* (2009). For examples of works from fellow ACLU affiliates addressing the effects of law enforcement in schools, see, e.g., Amir Whitaker, Jessica Cobb, Victor Leung & Linnea Nelson, ACLU Cal., *No Police in Schools: A Vision for Safe and Supportive Schools in CA* (2021); ACLU of Neb., *From the Classroom to the Courtroom: A Review of Nebraska's School Police Programs* (2018); ACLU of Pa., *Beyond Zero Tolerance: Discipline and Policing in Pennsylvania Public Schools* (2016).
- 2 The particular harms and risks of the use of tasers on children can include severe pain and psychological trauma, dangerous and uncontrolled falls, brain damage, heart attacks, and death. Johanna Wald & Lisa H. Thureau, *Strategies for Youth, Catch and Stun: The Use and Abuse of Conducted Electrical Weapons on Children and Youth* 30–38 (2022); *What Could Justify Using a Taser on an 8-Year-Old Girl?*, ACLU (Oct. 11, 2013), <https://www.aclu.org/news/national-security/what-could-justify-using-taser-8-year-old-girl> (reporting on the the irrational justification a law enforcement officer used for firing his taser at an 8-year-old girl). For analysis from the ACLU of Iowa on the inadequacy of taser policies in Iowa, see generally, ACLU of Iowa, *Taser Policies in Iowa: Empirical Assessment and Recommendations* (2014), <https://www.aclu-ia.org/news/aclu-report-finds-iowa-taser-policies-woefully-inadequate>.
- 3 See, e.g., ACLU of Iowa to Represent Knoxville Girl in “Sexting” Lawsuit, ACLU of Iowa (Nov. 11, 2016), <https://www.aclu-ia.org/press-releases/aclu-iowa-represent-knoxville-girl-sexting-lawsuit>.
- 4 Civil Rights Data Collection (CRDC) FAQs, U.S. Dep’t of Educ. (Sept. 26, 2025), <https://www.ed.gov/laws-and-policy/civil-rights-laws/crdc/crdc-faqs>.
- 5 See Off. for C.R., U.S. Dep’t of Educ., *2021–22 Civil Rights Data Collection A First Look: Students’ Access to Educational Opportunities in U.S. Public Schools* 2–3 (2025), <https://www.ed.gov/media/document/2021-22-crdc-first-look-report-109194.pdf>.
- 6 *Id.* at 14–15.
- 7 *Id.* at 7.
- 8 *Id.* at 23. For the purposes of this report, we use the definition of “students with disabilities” as provided by the Department of Education Office for Civil Rights in their master list of definitions, which “[r]efers to students with disabilities served under the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act of 1973, or both.” Off. for C.R., U.S. Dep’t of Educ., *Master List of CRDC Definitions* 20 (2023), <https://civilrightsdata.ed.gov/assets/downloads/2021-2220List20Definitions.pdf>.
- 9 See ACLU, *Cops and No Counselors*, *supra* note 1.
- 10 See Off. for C.R., U.S. Dep’t of Educ., *supra* note 5, at 14–15.
- 11 Chongmin Na & Denise C. Gottfredson, *Police Officers in Schools: Effects on School Crime and the Processing of Offending Behaviors*, 30 *Just. Q.*, 619, 620–21 (2013).
- 12 *Gunfire on School Grounds in the United States, Everytown*, <https://everytownresearch.org/maps/gunfire-on-school-grounds/> (last visited Nov. 4, 2025) (comparing incidents of gunfire on school grounds from 2018 with data from 2024).
- 13 See, e.g., Aaron Kupchik, ACLU of Pa., Anderson, *Research on the Impact of School Policing* (2020); Kenneth Alonzo, *Policing and Middle School: An Evaluation of a Statewide School Resource Officer Policy*, 4 *Middle Grades Rev.*, no. 2, 2018; Charles Crawford & Ronald Burns, *Preventing School Violence: Assessing Armed Guardians, School Policy, and Context*, 38 *Policing: Int’l J.* 631 (2015); Na & Gottfredson, *supra* note 11; Tillyer, Marie Skubak, Bonnie S. Fisher, and Pamela Wilcox, *The Effects of School Crime Prevention on Students’ Violent Victimization, Risk Perception and Fear of Crime: A multilevel opportunity perspective*, 28 *Justice Quarterly*: 249 (2011).
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- 15 *Frequently Asked Questions*, Nat’l Ass’n of Sch. Res. Officers, <https://www.nasro.org/training/training-courses> (last visited Apr. 23, 2026).
- 16 See Off. for C.R., U.S. Dep’t of Educ., *supra* note 5, at 14.
- 17 Compare National Data: Summary, U.S. DEP’T OF EDUC., <https://civilrightsdata.ed.gov/profile/us?surveyYear=2017> (last visited Nov. 4, 2025) (reporting more than 22,000 SROs employed in 2018), with National Data: Summary, U.S. DEP’T OF EDUC., <https://civilrightsdata.ed.gov/profile/us?surveyYear=2020> (last visited Nov. 4, 2025) (reporting more than 27,000 SROs employed in 2018).
- 18 Denise C. Gottfredson et al., *Effects of School Resource Officers on School Crime and Responses to School Crime*, 19 *Crim. & Pub. Pol’y* 905, 927–28 (2020).
- 19 *Id.*
- 20 Matthew T. Theriot, *School Resource Officers and the Criminalization of Student Behavior*, 37 *J. Crim. Just.* 280, 285 (2009).
- 21 See *id.*
- 22 See Isabella Rosario, *Ames School Board Votes to End Its School Resource Officer Program Next School Year*, Ames Trib., (last updated Dec. 14, 2021), <https://www.amestrib.com/story/news/2021/12/13/ames-schools-end-contract-police-2022-23-school-year/6496928001>; Laura Terrell, *Des Moines School Board Moves to End School Resource Officer Program*, KCCI Des Moines (last updated Feb. 17, 2021), <https://www.kcci.com/article/des-moines-school-board-votes-to-ends-school-resource-officer-program/35527902>; see also Mollie Swayne, *Prompted by New Law, Iowa City Community School District Opts Out of SROs*, KCRG (May 14, 2024), <https://www.kcrg.com/2024/05/15/prompted-by-new-law-iowa-city-community-school-district-opts-out-sros>.

- 23 See, e.g., Iowa Sec’y of State, Filing No. M518511, 28E Agreement: Sharing Agreement for a School Resource Officer with Chickasaw County Sheriff’s Office (2025) (agreeing to create a new SRO program in the Nashua-Plainfield Community School District); Iowa Sec’y of State, Filing No. M518427, 28E Agreement: The Purpose of This 28E Agreement Is to Establish the Terms and Conditions by Which the County, Through the Lyon County Sheriff’s Office, Shall Assign a Deputy to Serve the District as an SRO (2025) (agreeing to create a new SRO program in the Central Lyon Community School District).
- 24 See Iowa HF 2586.
- 25 See *id.*
- 26 Iowa Dep’t of Educ., Condition of Education 208 (2024), <https://educate.iowa.gov/pk-12/data/education-statistics>
- 27 See C.R. Data Collection, Off. for C.R., U.S. Dep’t of Educ, Referrals and Arrests (2024), <https://civilrightsdata.ed.gov/data> (compiling national referral and arrest data from 2021–22) [hereinafter CRDC Referrals and Arrests 2024].
- 28 See ACLU of Iowa, SRO Open Record Request Documents, https://drive.google.com/drive/u/0/folders/15wfb_eRO1wOCdMD54cm3fLj8J6S9LZ9 (ACLU of Iowa, SRO Open Record Request Documents, Google Drive) (last modified May 22, 2026) (on file with the ACLU of Iowa) [hereinafter ACLU of Iowa, SRO Data].
- 29 Iowa Dep’t of Educ., supra note 26, at 148–49.
- 30 *Id.* at 150.
- 31 It is important to note that racial disparities in school-related discipline and arrest is not the result of higher rates of criminal conduct from any particular group. Empirical statistics suggest that there is no statistically significant difference in school-related criminal conduct from one racial group to another. See, e.g., Russell J. Skiba, Robert S. Michael, Abra Carroll Nardo & Reece L. Peterson, The Color of Discipline: Sources of Racial and Gender Disproportionality in School Punishment, 34 Urb. Rev. 317, 338 (2002). Studies that control for variation in rates of criminal conduct across races still show persistent racial inequalities in school-based punishments. See, e.g., Michael Rocque, Office Discipline and Student Behavior: Does Race Matter?, 116 Am. J. Educ. 557, 573–74 (2010). Instead, racial bias in enforcement is primarily the result of school disciplinary approaches that predominantly focus on policing minor and subjective behavior. See Shafiqua J. Little & Richard O. Welsh, Rac(e)ing to Punishment? Applying Theory to Racial Disparities in Disciplinary Outcomes 25 Race Ethnicity & Educ. 564 (2018).
- 32 Iowa Dep’t of Educ., supra note 26, at 150. The use of the descriptive phrases “Hispanic or Latino” and “Black or African American” reflect the categorization used by the DOE OCR in their dataset. See CRDC Referrals and Arrests 2024, supra note 27.
- 33 See CRDC Referrals and Arrests 2024, supra note 27.
- 34 See *id.*
- 35 Iowa Dep’t of Educ., supra note 26, at 155; CRDC Referrals and Arrests 2024, supra note 27.
- 36 See, e.g., Mark Stringer, ACLU of Iowa Director: Police in Schools Cause Real Harm. Ames Should End Its SRO Program, Ames Trib. (Apr. 27, 2021), <https://www.amestrib.com/story/opinion/2021/04/27/aclu-iowa-police-schools-cause-harm-ames-should-end-sro-program/4853650001/>.
- 37 Advocating for Police-Free Schools in Iowa Toolkit, ACLU of Iowa, <https://www.aclu-ia.org/advocating-police-free-schools-iowa-toolkit> (last visited Apr. 13, 2026) [hereinafter ACLU of Iowa, Police-Free Schools Toolkit].
- 38 See sources cited supra note 22.
- 39 See ACLU of Iowa, Police-Free Schools Toolkit, supra note 37.
- 40 *Id.*
- 41 See Iowa HF 2586.
- 42 See ACLU, Cops and No Counselors, supra note 1, at 23–24; School-to-Prison Pipeline, ACLU, <https://www.aclu.org/publications/cops-and-no-counselors> (last visited May 6, 2026).
- 43 Richard Mendel, Sent’g Project, Effective Alternatives to Youth Incarceration (2023), <https://www.sentencingproject.org/reports/effective-alternatives-to-youth-incarceration>; Vera Inst., Just Kids: When Misbehaving Is a Crime (2017), <https://www.vera.org/when-misbehaving-is-a-crime>.
- 44 School-to-Prison Pipeline, ACLU, <https://www.aclu.org/issues/juvenile-justice/juvenile-justice-school-prison-pipeline> (last visited May 6, 2026).
- 45 *Id.*
- 46 See ACLU of Iowa, Police-Free Schools Toolkit, supra note 37.
- 47 Iowa Code § 22.1(1), 22.2.
- 48 The open records request letters used to collect data for this report were drafted based on the letter used by the ACLU of Nebraska in compiling their 2018 report, From the Classroom to the Courtroom: A Review of Nebraska’s School Police Programs. See ACLU Neb., supra note 1, at 26–27.
- 49 See ACLU of Iowa, SRO Data, supra note 28.
- 50 See *id.* The open records request letters sent to law enforcement agencies were also drafted based on the model used by the ACLU of Nebraska in their 2018 report, From the Classroom to the Courtroom: A Review of Nebraska’s School Police Programs. See ACLU Neb., supra note 1, at 28–29.
- 51 Iowa Code §§ 28E.4, 28E.5 (2026).
- 52 *Id.*
- 53 *Id.*
- 54 See Michael Louis McIntyre, Tarah Hodgkinson & Tullio Caputo, Strategic Planning Practices in Policing: Evidence From the Field, 46 Policing: Int’l J. 795, 795–97 (2023).
- 55 See Iowa Code § 28E.5(3).

- 56 Of the districts that prioritized the creation of a safe learning environment or school safety, eight districts also listed creating an atmosphere free from intimidation as a goal of their SRO program.
- 57 See, e.g., Natasha Keicher, Ex-School Resource Officer Won't Face Charges in Jasper County Sheriff's Office Investigation, WHO Des Moines (June 15, 2026), <https://who13.com/news/iowa-news/ex-school-resource-officer-wont-face-charges-in-jasper-county-sheriffs-office-investigation>; Clark Kauffman, Officer Who Had Sex With Teenager Fights His Law Enforcement Decertification, Iowa Capital Dispatch (July 12, 2022), <https://iowacapitaldispatch.com/2022/07/12/officer-who-had-sex-with-teenager-fights-his-law-enforcement-decertification>.
- 58 See Inst. for Youth In Pol'y, Challenges and Limitations of Community Policing in U.S. Law Enforcement (2025); Meg Anderson, Police Say ICE Tactics are Eroding Public Trust in Local Law Enforcement, NPR (March 30, 2025), <https://www.npr.org/2025/03/30/nx-s1-5304236/police-say-ice-tactics-are-eroding-public-trust-in-local-law-enforcement>.
- 59 See Tyler Whittenberg & Maria Fernandez, NYU Steinhardt Metro. Ctr. for Rsch. on Equity & the Transformation of Schs., Ending Student Criminalization and the School-to-Prison Pipeline 2-3 (2025).
- 60 See ACLU of Iowa, SRO Data, *supra* note 28. The phrase "costs" is used here as it best reflects the language used in the contracts provided to us by school districts and law enforcement agencies. In determining the proper method of splitting the fees associated with an SRO between the school district and the law enforcement agency, different terms are used to describe the arrangement. In some instances, "costs" may be limited to only the salary of the SRO, but in other instances it may extend to include additional expenses such as training, equipment, or insurance. In other instances, the phrase "costs" is used generically with no additional context provided. The \$98,000 figure is an average of all of the listed expenses paid by districts as contained in the SRO contacting documentation we received, but the items included in that "cost" calculation vary widely from district to district.
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- 62 Bureau Lab. Stat., Dep't of Lab., May 2023 State Occupational Employment and Wage Estimates: Iowa (last modified Apr. 3, 2024), https://www.bls.gov/oes/2023/may/oes_ia.htm#25-0000.
- 63 See Bondurant-Farrar Cmty. Sch. Dist. & Polk Cnty., Law Enforcement Services Agreement 6 (2024) (on file with the ACLU of Iowa).
- 64 See Boyden-Hull Cmty. Sch. Dist. & Sioux Cnty., School Resource Program Memorandum of Understanding 3 (2018) (on file with the ACLU of Iowa).
- 65 See Off. Cmty. Oriented Policing Servs., U.S. Dep't Just., Fact Sheet: 2025 COPS Hiring Program—Advancing Common Sense Community Policing by Hiring Officers 2 (2025).
- 66 See *id.*
- 67 See *id.*
- 68 See *supra* Inadequate Statements of Purpose for SRO Programs., at 14-15.
- 69 See, e.g., E-mail from Scott Roen, Police Chief/SRO, Winfield Police Dep't, to Jacob A. Sarasin, Legal Fellow, ACLU of Iowa. (Oct. 30, 2025, at 08:28 CT) (on file with the ACLU of Iowa).
- 70 Nat'l Ass'n of Sch. Res. Officers, Basic School Resource Officer Course Outline and Objectives 1 (2025), <https://www.nasro.org/training/training-courses>.
- 71 Iowa Code §80B.11G (2025).
- 72 See Iowa HF 2711 (2026).
- 73 Isabelle Foland, Iowa No Longer Requires Bias Training for Police. What happens next?, Des Moines Reg. (Jul. 6, 2026), <https://www.desmoinesregister.com/story/news/crime-and-courts/2026/07/06/iowa-police-bias-training-repeal-george-floyd/90491953007/>.
- 74 Jodi L. Viljoen, Patricia A. Zapf & Ronald Roesch, Adjudicative Competence and Comprehension of Miranda Rights in Adolescent Defendants: A Comparison of Legal Standards, 13 Psychol. Pub. Pol'y & L. 204, 206 (2007).
- 75 See, e.g., *Tinker v. Des Moines Independent Community School District*, 393 U.S. 503, 506 (1969) (addressing First Amendment freedom of speech and expression rights); *New Jersey v. T. L. O.*, 469 U.S. 325, 336-37 (1985) (addressing Fourth Amendment search and seizure rights); *Goss v. Lopez*, 419 U.S. 565, 572-76 (1975) (addressing Fourteenth Amendment due process rights); see also e.g., *State v. Lindsey*, 881 N.W.2d 411, 427-28 (2016) (applying the Federal Constitutional search and seizure framework to the search and seizures protections in the Iowa Constitution).
- 76 U.S. Const. amend. V; Iowa Const. art. I, § 10 ("Rights of persons accused"); *Miranda v. Arizona*, 384 U.S. 436 (1966); see also Iowa Code § 232.11(1).
- 77 U.S. Const. amend. V.
- 78 U.S. Const. amend. IV; Iowa Const. art. I, § 8 ("Personal security—searches and seizures").
- 79 See Iowa SF 44 (2019).
- 80 Iowa Code § 232.11(1)(a).
- 81 *Id.*
- 82 To determine if a student is in custody, two discrete inquiries must be made—first, what were the circumstances surrounding the interrogation; and second, given those circumstances, would a reasonable person have felt as though they were at liberty to terminate the interrogation and leave. *Thompson v. Keohane*, 516 U.S. 99, 112 (1995). In the context of the interrogation of a juvenile, the age of the juvenile is relevant to consider in determining if they would have felt at liberty to terminate the interrogation and leave. *J.D.B. v. North Carolina*, 564 U.S. 261, 277 (2011).
- 83 See Nat'l Ass'n of Sch. Res. Officers, *supra* note 70.
- 84 See Julianna Nicole Casella Ajjah K. Goodwin, Kristin Scardamalia, Yourdanos Bekele & Cindy M. Schaeffer, School Resource Officers' Perceptions of and Responses to Student Mental Health Concerns: A Qualitative Study, 11 Front. Educ., 2026, at 1, 1-2.
- 85 See ACLU, Cops and No Counselors, *supra* note 1 (citing Gary Sweeten, Who Will Graduate? Disruption of High School Education by Arrest and Court Involvement, 23 Justice Q. 462 (2006)).

- 86** Iowa Code § 232.19(2) (2026).
- 87** See generally, Iowa Ass’n Sch. Bds., Success for All Students: IASB Strategic Plan (2022) (discussing one of the association’s core roles of developing model policies to be adopted by school boards across the state).
- 88** Compare Newton Police Dep’t, Policy Manual: Temporary Custody of Juveniles § 901.5 (2025), with Letter from Chris Wing, Police Captain, Newton Police Dep’t, to Jacob A. Sarasin, Legal Fellow, ACLU of Iowa (Oct. 15, 2025) (on file with the ACLU of Iowa).
- 89** Iowa Code § 232.11(2) (2026).
- 90** *Id.*
- 91** Lexipol, a for-profit limited liability company, is the nation’s leading policymaker for local police departments. However scholars contend that policies drafted by Lexipol are often insufficiently tailored to the needs of the community and in many cases fail to address racial profiling, stop and frisk, and other problematic practices because they are resistant to go beyond the minimum requirements of court decisions out of fear of increased liability exposure. Ingrid V. Eagly & Joanna C. Schwartz, Lexipol: The Privatization of Police Policymaking, 96 Tex. L. Rev. 891, 892–98 (2018).
- 92** See, e.g., Oskaloosa Police Dep’t, Policy Manual: Temporary Custody of Juveniles § 900.5 (2025) (citing Iowa Code § 232.19).
- 93** See *id.* at § 900.14.
- 94** See e.g., Davenport Cmty. Sch. Dist. Bd. Dir. Policy § 502.04: Student Complaints and Grievances (2025); Prairie City Monroe Cmty. Sch. Dist. Educ. Dir. Policy Manual Policy 502.04: Student Complaints and Grievances (2022).
- 95** Off. Cmty. Oriented Policing Servs., Collaborative Reform Initiative Continuum of Technical Assistance Services 17 (2023).
- 96** See Iowa Dept’t of Educ., *supra* note 26; CRDC Referrals and Arrests 2024, *supra* note 27.
- 97** See *supra* note 31 and accompanying text.
- 98** See Steven C. Teske, A Study of Zero Tolerance Policies in Schools: A Multi- Integrated Systems Approach to Improve Outcomes for Adolescents, 24 J. Child & Adolescent Psychiatric Nursing 88 (2011); Na & Gottfredson, *supra* note 11; Theriot, *supra* note 20.
- 99** See, e.g., Emily K. Weisburst, Patrolling Public Schools: The Impact of Funding for School Police on Student Discipline and Long-term Education Outcomes, 38 J. Pol’y Analysis & Mgmt. 338, 361 (2019); Robert A. Brown, Kenneth J. Novak & James Frank, Identifying Variation in Police Officer Behavior Between Juveniles and Adults, 37 J. Crim. Just. 200, 200–08 (2009); Na & Gottfredson, *supra* note 11; Gottfredson et al., *supra* note 18.
- 100** See sources cited *supra* note 99.
- 101** See Weisburst, *supra* note 99.
- 102** Iowa Code § 279.84(2) (2026).