SIGNIFICANT ACTIVITY REPORT:
JROTC ENROLLMENT AND PROCEDURES

Case No. 21-000483
Wednesday, May 18, 2022

For each of the last two school years, more than one in five CPS schools with Junior Reserve Officers’ Training Corps programs enrolled all or almost all of their freshmen in JROTC — a program that is supposed to be voluntary, a CPS OIG performance review has found.

Specifically, for two school years in a row, four of 37 CPS schools with JROTC programs enrolled 100 percent of their freshmen in JROTC — a clear sign the program was not voluntary. Another four schools enrolled 91 to 99 percent of their ninth graders in JROTC, an analysis of CPS final semester grades by the OIG’s Performance Analysis Unit showed.

Many students from schools with 90+ percent JROTC enrollment rates told the OIG they were automatically enrolled in freshman JROTC without any choice in the matter. Usually this was in place of Physical Education. JROTC can be used to fulfill CPS’s PE high school graduation requirement, but some students said they were never offered PE as freshmen.

So, to obtain a needed graduation credit, typically these students had to wear a JROTC uniform once a week, participate in military-style drills, and follow their school’s JROTC grooming standards.

Students from five neighborhood schools were among those who said they were automatically enrolled in JROTC as freshmen. Several were surprised to learn their neighborhood school required

Table 1: Schools with More Than 90% of 2019-20 or 2020-21 Freshmen in JROTC

<table>
<thead>
<tr>
<th>High School</th>
<th>Has Attendance Boundary</th>
<th>2019-20 % 9th Graders in JROTC</th>
<th>2020-21 % 9th Graders in JROTC</th>
</tr>
</thead>
<tbody>
<tr>
<td>School A</td>
<td>Citywide</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>School B</td>
<td>Yes</td>
<td>99%</td>
<td>100%</td>
</tr>
<tr>
<td>School C</td>
<td>Yes</td>
<td>98%</td>
<td>100%</td>
</tr>
<tr>
<td>School D</td>
<td>Yes</td>
<td>96%</td>
<td>100%</td>
</tr>
<tr>
<td>School E</td>
<td>Yes</td>
<td>100%</td>
<td>98%</td>
</tr>
<tr>
<td>School F</td>
<td>Citywide</td>
<td>100%</td>
<td>96%</td>
</tr>
<tr>
<td>School G*</td>
<td>Citywide</td>
<td>N/A</td>
<td>94%</td>
</tr>
<tr>
<td>School H</td>
<td>Yes</td>
<td>92%</td>
<td>92%</td>
</tr>
<tr>
<td>School I*</td>
<td>Yes</td>
<td>100%</td>
<td>N/A</td>
</tr>
</tbody>
</table>

*School G’s program began in 2020-21; School I’s ended in that SY.
Source: OIG Analysis of Freshmen with Final Semester Grades in JROTC or PE at JROTC Program Schools and CPS Attendance Boundary Data.
JROTC. That included one girl who said she was unable to opt out of freshman JROTC even though she and her mother raised religious objections to it, based on their Jehovah’s Witnesses faith. That school year, all the school’s freshmen were enrolled in JROTC, although in an earlier school year the student’s sibling never had to take JROTC.

The size of a school’s total enrollment tended to be the strongest predictor of whether a school had a large freshman JROTC enrollment rate, with smaller schools being more likely to produce such rates. In addition, the schools with 90+ percent JROTC freshman enrollment rates were all underutilized and were almost all on the South or West Sides of Chicago. Thus, this group of schools required their freshmen to jump extra hurdles (wearing a JROTC uniform, marching in drills, etc.) to obtain a required graduation credit that students in traditional CPS high schools did not have to navigate.

In addition, the OIG’s review indicated that 100-percent, or even 90-percent, JROTC freshman enrollment rates were not occurring at JROTC program schools on the North Side of Chicago. This raises obvious concerns about inequity and appears to be inconsistent with a new CPS PE policy that promotes “equitable access for all CPS students” to PE. The policy goes into effect next school year.

The OIG issued 10 recommendations as a result of its performance review, and CPS has indicated it largely supports those recommendations. CPS’s responses are summarized in the “OIG Recommendations” section of this report.

In particular, CPS said that “no school should automatically enroll any student or class of students into the JROTC program unless it is a feature of the School’s program” and the practice is transparently disclosed in recruitment information, enrollment materials and school websites.

Surveyed Schools

CPS is host to the largest JROTC program in the nation, according to CPS JROTC leadership. Indeed, over the last three school years, on average, one of every 14 CPS high school students was enrolled in JROTC, a CPS OIG analysis found. That amounted to, on average, roughly 7,470 JROTC cadets annually.

The bulk of these cadets — 64 percent — were enrolled in one of CPS’s 37 JROTC program schools, where JROTC Army, Navy, Marine or Air Force classes are supposed to be attended by at least 10 percent of a school’s students or a minimum 100 students to maintain the program. The remaining CPS JROTC students attended one of CPS’s six JROTC military academies, where every student is enrolled in JROTC classes.

1 The OIG used a three-year average here because CPS schools were closed for part of SY 2019-20 due to the Covid-19 pandemic and then opened remotely in SY 2020-21 — situations that could have affected JROTC enrollment.
For purposes of its performance review, the OIG conducted a five-year analysis of JROTC program school enrollment trends. (Military academies were not a subject of this review.) From this work, the OIG detected freshman JROTC enrollment rates of more than 90 percent at several schools during each of the last two school years. This rate was inordinately high as the next highest rate was 56 percent in 2019-20 (the most recent pre-pandemic year); most schools that year had rates of less than 35 percent.

The OIG identified any school with a current JROTC program and a more than 90 percent freshman JROTC enrollment rate in 2019-20 or 2020-21 as a “Surveyed School.”

Eight schools fell into this category — five neighborhood schools and three schools with citywide enrollment. All featured Army JROTC programs. A ninth school enrolled more than 90 percent of its freshmen in JROTC in 2019-20 but then lost its JROTC program the following school year, so it was not included among Surveyed Schools.

At Surveyed Schools, the OIG interviewed principals, students and some parents. It surveyed JROTC instructors, interviewed their superiors in CPS JROTC leadership and obtained sample parent consent forms and JROTC syllabi.

Concerning Trends

Based on its performance review, the OIG identified the following concerning trends among JROTC program schools:

- Hundreds of CPS freshmen in the last two school years were automatically enrolled in JROTC. In almost all of these cases, these students took JROTC in lieu of PE. Although CPS JROTC is supposed to be voluntary, freshman JROTC enrollment at many Surveyed Schools often operated like a pre-checked box: students were automatically placed in JROTC and they had to get themselves removed from it if they did not want it. Sometimes this was possible; sometimes it was not.

- Across Surveyed Schools, the process for opting out of JROTC was often inconsistent, poorly communicated or non-existent. Some Surveyed School principals said students could opt out but many students said this option was not mentioned or clearly explained or easily accomplished when they tried it. CPS JROTC leadership said students could opt-out if their parents did not sign a parent consent form but a few students and parents said they never received such forms, including one student who raised religious objections to JROTC, based on her Jehovah’s Witnesses faith, but was unable to opt out of the course. Plus, almost all Surveyed School principals had never heard of these forms.
Instructors at Surveyed Schools were using a variety of parent consent forms containing varying levels of disclosure about JROTC. At Surveyed Schools, the most commonly-used parent consent form (called a Health Statement form), if signed, did not contain enough information about JROTC to constitute knowing parent consent for a student to participate in JROTC. The relevant portion of that form is below:

**HEALTH STATEMENT**

**MY (OUR) SON/DAUGHTER:** has no medical condition or impairment (except as noted below) that would preclude his/her full participation in the Army Junior Reserve Officers’ Training Corps, and has my (our) permission to participate in any and all JROTC sponsored classes, training, and activities.

**LIMITATIONS:**

The Health Statement form reflected far less information about JROTC than required by the CPS Student Code of Conduct for parent consent forms at JROTC military academies. That Code states:

“Upon their child’s enrollment at a military academy, parents/guardians shall be informed of the uniform policy, expectations of the military academy, and the administrative transfer policy, and shall indicate by signature their agreement to adhere to the terms of these policies.”

JROTC officials said signed parent consent forms proved student enrollment in JROTC was voluntary. However, none of the Surveyed Schools’ military instructors could produce a requested random sample of signed parent consent forms. JROTC instructors at Surveyed Schools were not consistently collecting parent consent forms and/or were not properly maintaining those forms. A few JROTC instructors said they did not follow up on missing forms. Some JROTC instructors said forms requested by the OIG had been destroyed or discarded — in a few cases out of what was described, curiously, as Covid-19 safety concerns. Destruction of such student records would be inconsistent with the CPS Student Records Management and Retention Policy and the Illinois Local Records Act, according to one CPS official. Intentional destruction of student records can be a fireable offense and a Class 4 Felony.

Seven of the Surveyed Schools with unusually high freshman JROTC enrollment rates in each of the last two school years were on the South or West Sides of Chicago. An eighth was on the Northwest Side. None were on the North Side (traditionally identified as north and east of the Chicago River). All Surveyed Schools were in underutilized buildings. This appears to be inconsistent with a new CPS PE policy intended to promote “equitable access for all CPS students” to PE. The policy goes into effect next school year.
The smaller a JROTC program school’s total enrollment and the lower its building utilization rate, the higher its JROTC freshman enrollment rate was likely to be, an OIG correlation analysis of eight factors indicated. The percent of students by race and by free-and-reduced-lunch status also had some correlation but not as strong as that of a school’s total enrollment and utilization rate.

From 2019-20 to 2020-21, a smaller percent of freshmen continued with JROTC as sophomores in Surveyed Schools (40 percent) than in Non-Surveyed Schools (67 percent), an OIG analysis found. This could indicate that freshmen who are automatically enrolled in JROTC are less likely to continue with it as sophomores than freshmen who freely choose JROTC.

In 2019-20, JROTC enrollment at one out of six program schools fell under the minimum level that national JROTC officials can require to maintain a JROTC program. In addition, in SY 2019-20 (the most recent pre-pandemic school year) JROTC program schools averaged 49 total students per JROTC instructor — less than the average 70 students per JROTC instructor in military academies, a CPS OIG analysis indicated. Some JROTC program school instructors were responsible for, on average, as few as 16, 17 or 20 total JROTC students. This is fewer students than some non-JROTC CPS teachers see in a single class.

A few JROTC program schools were over- or under-enrolling special needs students in JROTC, contrary to national JROTC regulations. At the worst-offending school last school year, the percent of Diverse Learners in JROTC (68 percent) was more than twice the school’s overall Diverse Learner percentage (of nearly 29 percent).

Across all JROTC program schools, many students were enrolled in JROTC courses out of sequence, without regard to prerequisite classes and contrary to national JROTC recommendations. In SY 2019-20, at least half the seniors who had taken a JROTC II, III, or IV course at 12 JROTC program schools had been placed into an out-of-sequence JROTC course during high school.

**JROTC Enrollment Rate Explanations**

CPS JROTC is supposed to be “voluntary” and if students are being placed in it automatically, that is a school “programming issue,” not a JROTC issue, CPS JROTC officials told the OIG. That’s because school programmers — not JROTC officials — schedule students into JROTC.

Ideally, students are programmed into JROTC after they have expressed interest in the program, often during an Open House or student orientation.

Principals’ reasons for 90+ percent freshman JROTC enrollment rates centered on two themes: Physical education and funding. Principals said they had lost a PE teacher and had difficulty finding a new one, or they couldn’t afford another PE teacher, or they had to cut a PE teacher due to budget constraints. This meant freshmen were placed in JROTC in lieu of
PE because JROTC is allowed statewide as a substitute for PE, which is a CPS graduation requirement.

Some principals conceded that JROTC saved their school money. That’s because CPS Central Office and the U.S. Department of Defense share the cost of all JROTC instructors, while PE teachers are funded out of Student-Based-Budgeting dollars used by principals to craft their school budgets. Thus, JROTC instructors are “free” to schools while CPS last school year paid nearly $6 million to cover the salaries and benefits of the 97 JROTC instructors in the 37 CPS JROTC program schools. Last school year, CPS covered 69 percent of such costs while the DoD covered 31 percent.

One former counselor at a school with a high freshman JROTC enrollment rate said that under the Student-Based-Budgeting system, the smaller the student body, the less choices a school can offer. He warned that “If you don’t solve the Student-Based-Budgeting problem, you’re not gonna solve the [high JROTC enrollment] problem.”

This theory was reflected in an OIG correlation analysis2 (See Table 2) indicating that the smaller a school’s total enrollment and the lower its building utilization rate, the more likely it was to have a larger freshman JROTC enrollment rate. CPS’s response to the OIG said that, with the help of such practices as school equity grants, smaller-enrollment schools should have the resources they need “to meet instructional needs.” However, CPS added, all principals will be allowed to submit requests for additional funding after a special May training session on JROTC.

Automatic freshman enrollment in JROTC also could be a way to help schools maintain the minimum JROTC enrollment levels needed to avoid dissolution of their JROTC programs. Asked to explain an unusually high freshman JROTC enrollment rate, one CPS principal said the school had put freshmen in JROTC instead of PE that school year in an attempt to “save” the program, which had been suffering dwindling enrollment. After all, neither the current PE policy nor the new one, effective next school year, expressly prohibits such automatic enrollment of students into JROTC.

Table 2: Correlation between Attributes of 37 Schools with JROTC Programs and Their % of 2019-20 Freshmen in JROTC.

<table>
<thead>
<tr>
<th>Attribute</th>
<th>Correlation</th>
</tr>
</thead>
<tbody>
<tr>
<td>20th-Day Total Enrollment</td>
<td>−0.53</td>
</tr>
<tr>
<td>Space Utilization Rate</td>
<td>−0.50</td>
</tr>
<tr>
<td>Black and Hispanic combined %</td>
<td>0.44</td>
</tr>
<tr>
<td>Asian %</td>
<td>−0.42</td>
</tr>
<tr>
<td>White %</td>
<td>−0.39</td>
</tr>
<tr>
<td>Free/Reduced Lunch %</td>
<td>0.38</td>
</tr>
<tr>
<td>Black %</td>
<td>0.37</td>
</tr>
<tr>
<td>Hispanic %*</td>
<td>−0.23</td>
</tr>
</tbody>
</table>

*Not statistically significant.

Source: OIG Analysis of 2019-20 CPS Demographic, Class Schedule, Grade and Space Utilization Data.

2 School attributes are listed in order of the strength of their correlation, which can be either negative or positive. 20th-Day Total Enrollment and Space Utilization Rate were among several school attributes with negative correlations, meaning that the lower the attribute was at a school, the higher its freshman JROTC enrollment rate was likely to be. Other attributes had positive correlations, meaning the higher the attribute was at a school, the higher its freshman JROTC enrollment rate was likely to be.
Two principals at schools with 90+ percent freshman JROTC enrollment rates did not describe their JROTC enrollment practices as amounting to automatic enrollment. However, in OIG interviews, some of their students did. As one explained: “They just put me in it.”

**REACTIONS TO JROTC**

JROTC’s mission is “to motivate young people to be better citizens.” JROTC teaches leadership skills and character-building, among other things. Indeed, the OIG heard many, many positive comments about JROTC from principals as well as students who had never requested the course.

For example, some JROTC students liked learning how to be a leader. One liked receiving badges for achievements. Some enjoyed marching. One even liked the uniforms, which at one Surveyed School accounted for 35 percent of a student’s grade. Several liked the instructors.

“It’s an interesting program and you get to do fun things,” said one student.

Principals liked the possibility of JROTC scholarships, the leadership training, the field trips JROTC provided to “underexposed” students, and the school volunteerism JROTC promoted.

But some students did not like or want JROTC. One student said she objected to the class because JROTC uniforms, drills and pledges violate her religious beliefs as a Jehovah’s Witness. (The school’s resolution was that the student remained in JROTC but did not wear a uniform, participate in drills or say a pledge.) Another student did not like wearing a uniform with special shoes because it made biking to school difficult. One student said JROTC taught her about wars and military bases and she would have preferred PE.

Chief among the concerns of students and even a few parents was that freshmen should have been given a choice between PE and JROTC. Even students who liked JROTC made such comments.

Said one such student: “I liked it, but in the beginning I didn’t like being forced to have the class. . . . JROTC is not for everyone. It should not be forced on people.”

**OIG Recommendations**

This report is not a critique of the mission or content of CPS JROTC programs. Its primary purpose is to highlight and try to address an issue that seems to be disproportionately affecting certain schools — whether all freshmen are being allowed to voluntarily choose JROTC.

Although this performance review is entitled “JROTC Enrollment and Procedures,” most of the OIG’s recommendations sought action from CPS Central Office, in a few cases in conjunction with the CPS JROTC Department. Those recommendations, along with CPS’s response to them to date, are listed below:
1) Require a PE option in neighborhood JROTC program schools; require transparency in others.

To promote equitable access to PE consistent with the new CPS PE Policy, the OIG recommended that CPS require that neighborhood schools with JROTC programs provide all students a PE option. As much as possible, in such schools, JROTC should be a choice rather than a default class that students must ask to be removed from if they do not want it. To further reinforce this, the OIG recommended that the Board adopt a policy requiring that all neighborhood schools with JROTC programs also provide all students a PE option.

However, CPS and the Board might want to allow mandatory JROTC under certain circumstances. For example, the principal of one citywide JROTC program school said 100 percent JROTC enrollment is part of his small school’s design, although this is not made clear on the school’s online profile. Therefore, the OIG recommended that any non-neighborhood school that wants to make JROTC mandatory should be required to state that policy clearly on its school profile, school website and at any CPS presentations that students might attend to help them select high schools, including Open Houses and High School Fairs.

CPS RESPONSE: During May training, the District will notify all CPS high school principals that “they must offer Physical Education as a course offering to all students, consistent with the Board of Education’s Physical Education Policy.” In addition, CPS said, “The district agrees that under our PE policy and under the tenets of the JROTC program, no school should automatically enroll any student or class of students into the JROTC program unless it is a feature of the School’s program, is included in their recruitment and enrollment materials and transparently advertised to parents and students on their websites.” One citywide school that mandated JROTC in lieu of PE as part of its school design is adding a PE position next fiscal year, CPS told the OIG.

2) Create a universal CPS JROTC program parent consent form.

Due to the supposedly voluntary nature of the JROTC program and JROTC’s ability to set standards and disciplinary penalties beyond those outlined in the Student Code of Conduct, a parent consent form should accompany each JROTC program enrollment. The OIG recommended that CPS develop a universal CPS parent consent form for JROTC program schools that contains information parents would need to make informed decisions about whether to allow their children to participate in JROTC. This form should disclose, among other things, whether students have an option to take either JROTC or PE to fulfill their PE graduation requirement and how to opt out of JROTC, if such an option is possible.

Participation in a JROTC program also should be accompanied by, at a minimum, a signed parent consent form containing disclosures required of military academies in the Student Code of Conduct. The OIG also recommended that additional disclosures be added to the
form. Schools should keep their own copies of this form, preferably electronically in Aspen. Meanwhile, JROTC can continue to use and keep whatever forms it deems necessary.

CPS RESPONSE: JROTC and CPS have been working on a universal JROTC enrollment form.

3) **Maintain and monitor existence of JROTC program parent consent forms.**

A universal CPS parent consent form verification process should be established that sets a deadline for the submission of parent consent forms, requires that schools (separately from JROTC) monitor that all JROTC students have such signed forms on file, requires that schools properly maintain copies of those forms — preferably in Aspen, and outlines options for students who have not provided such forms as of SY 2022-23.

CPS RESPONSE: Schools should be able to upload and maintain the new universal JROTC enrollment forms electronically in Aspen. The OIG notes that CPS has not yet provided the OIG with a verification process for these forms — i.e., setting a deadline for when they are due, specifying who will check that they are on file, outlining how to proceed if a student form is missing by the required deadline.

4) **Train JROTC program principals on JROTC.**

Given CPS’s substantial financial investment in JROTC, CPS officials — perhaps jointly with JROTC officials — should train CPS principals on how to effectively oversee a JROTC program. This could include the hallmarks of an effective JROTC program, as well as the benefits and requirements of a JROTC program, grading scales involving JROTC uniforms and grooming standards, JROTC course prerequisites, JROTC special needs enrollment regulations and JROTC minimum enrollment rules.

CPS RESPONSE: CPS JROTC officials will offer training to high school principals on May 17, 18 and 19 and repeat this training annually. This will cover, among other things, the importance of: voluntary enrollment in JROTC; not using JROTC “as a Physical Education Opt-Out”; enrolling students in the correct sequence of JROTC courses, with the correct prerequisites; and adhering to the uniform policies of the Military Services.

5) **Provide training on JROTC record retention.**

Because JROTC military instructors say they have been destroying signed parent consent forms, these instructors, CPS JROTC leadership, principals of schools with JROTC programs and their school records coordinators should be trained on the CPS Student Records Management and Retention Policy and how it relates to JROTC forms.

CPS RESPONSE: Some parties have already received records training. Additional training will be presented at the annual CPS Legal Conference and recorded. Multiple parties will be encouraged to view the recorded training.
6) **Monitor JROTC enrollment, JROTC instructor student caseloads and Diverse Learner rates.**

JROTC officials say they monitor enrollment in JROTC program schools. However, because CPS covers more than two-thirds of the cost of JROTC program instructor salaries and benefits, CPS officials not affiliated with JROTC — in Central Office or Network Offices — also should take an active role in monitoring program enrollment and instructor student caseloads to determine if it makes economic sense to continue a JROTC program when these school indicators fall below a certain point. CPS also should monitor Diverse Learner enrollment to ensure each school’s JROTC Diverse Learner ratio is similar to that school’s overall Diverse Learner ratio, as JROTC regulations require. Schools should not be over-enrolling Diverse Learners into JROTC in an attempt to meet a JROTC enrollment minimum.

CPS RESPONSE: Under the supervision of the Chief of College and Career Success, JROTC and other departments will implement an auditing/monitoring process this fall that will address JROTC enrollment by school and “the proportion of general education students to students with disabilities enrolled in JROTC by the school.” The data will be compiled by Network Strategists and reviewed by the Department of Career Success. “JROTC will address schools that are out of compliance with JROTC policy through various corrective measures up to and including the removal of the JROTC program from the school at [the] appropriate time.”

7) **Give principals some role in JROTC military instructor selection.**

Principals should have some role in deciding whether potential JROTC instructors are a good fit for their schools. This was recommended by two principals.

CPS RESPONSE: The JROTC office will place military instructors and commandants in schools “with the input and feedback of School Principals,” according to CPS. In addition, “In consultation with school principals, JROTC instructors will be reassigned to other programs at different schools — as needed, to maximize quality control and [the] effectiveness of those programs.”

8) **Consider Enforcing JROTC Prerequisites.**

According to national JROTC guidance and the CPS course catalogue, JROTC classes are to be taken in a certain order, starting with Leadership Education and Training I, followed by LET II, then LET III, then LET IV. CPS should consider enforcing these prerequisites, although it may want to outline special circumstances and create procedures under which they can be waived.

CPS RESPONSE: The importance of enrolling students in the proper course sequence will be shared with principals, who will be encouraged to share the training materials with the appropriate staff. The number of JROTC students without appropriate prerequisites and out-of-sequence JROTC students also will be compiled by Network Strategists and reviewed by
the Department of Career Success. JROTC will address schools that are out of compliance, as explained above in CPS’s response to Recommendation 6.

9) Revisit the JROTC military instructor pay scale.

The CPS JROTC military instructor pay scale is different than the teacher’s union pay schedule, unlike at some districts. The CPS JROTC military instructor pay scale should be analyzed to determine if it should be adjusted or replaced by the teachers union salary schedule. Two CPS compensation experts could not explain the origin or rationale of the JROTC military instructor pay scale.

CPS RESPONSE: The CPS Talent Office has evaluated the Military Instructor Pay Scale and will be implementing a new pay scale for military instructors as of July 1.

10) Provide special support to hard-hit neighborhood schools with JROTC programs.

CPS and its Equity Office should provide special support to neighborhood JROTC program schools with low total enrollments or under-utilized facilities, particularly on the South and West Sides, to ensure they have the personnel and funds to offer students both JROTC and PE — just as North Side JROTC program schools do now. This is consistent with a new CPS PE policy calling for “equitable access” to PE.

CPS RESPONSE: “All school budgets support schools’ ability to fund PE offerings,” CPS told the OIG. Low-enrollment schools receive additional funding from the District to ensure they have the resources to meet instructional needs. This includes “small school support from the District’s equity grants and the practice of using prior-year enrollment for budget allocations.” After principal training in May on JROTC, principals may submit requests for additional funding through their Network Chiefs.