

United States Government Accountability Office Report to Congressional Committees

August 2023

SENIOR RESERVE OFFICERS' TRAINING CORPS

Actions Needed to Better Monitor Diversity Progress CORPS

GAO Highlights

Highlights of GAO-23-105857, a report to congressional committees

Why GAO Did This Study

The Senior ROTC program is DOD's largest source of military officers. It produced more than 94,000 officers since academic year 2011 from ROTC units in every U.S. state and many U.S. territories. As such, the program can make significant contributions to DOD's efforts to cultivate diversity.

Senate Report 117-39, accompanying a bill for the National Defense Authorization Act for Fiscal Year 2022, includes a provision for GAO to review the ROTC program's contributions to a diverse military officer corps. GAO, among other things, (1) describes **ROTC-commissioned officer diversity** trends for academic years 2011-2021, by race, ethnicity, and gender, and socioeconomic makeup; (2) describes whether ROTC unit racial, ethnic, and gender makeup aligned with school makeup; and (3) assesses the extent to which the military departments have evaluated and, as necessary, modified ROTC programs to better ensure they contribute to a diverse officer corps.

GAO analyzed academic years 2011– 2021 race and ethnicity and gender data for ROTC units and schools and Census Bureau socioeconomic data.

What GAO Recommends

GAO makes four recommendations including that the Army develop quantifiable diversity goals, DOD establish a consistent process to identify a comparison group, the military departments collect and analyze quantifiable diversity data in program evaluations, and the military departments evaluate both the performance and resources of ROTC programs. DOD concurred with the recommendations.

View GAO-23-105857. For more information, contact Brenda S. Farrell at (202) 512-3604 or farrellb@gao.gov.

What GAO Found

The population of Senior Reserve Officers' Training Corps (ROTC)commissioned officers became more diverse for race and ethnicity and gender in academic years 2011–2021. For example, during this period, the percentage of White officers decreased from 73.6 percent to 66.3 percent, while the percentages of Blacks or African Americans, Hispanics or Latinos, and Asians increased. Also, ROTC-commissioned officers have increasingly come from economically advantaged areas—that is, from those with poverty and unemployment rates below the national average and household incomes above the national median.

SENIOR RESERVE OFFICERS' TRAINING

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ROTC-Commissioned Officer Trends for Race and Ethnicity, Academic Years 2011–2021

Percentage



Source: GAO analysis of military department data. | GAO-23-105857

Generally, the racial and ethnic and gender makeup of ROTC units did not align with the student body of their host schools, most notably for gender. However, Historically Black Colleges and Universities (HBCUs) and Minority-Serving Institutions (MSIs) generally had a more racially and ethnically diverse population for ROTC units to draw from. The military departments had ROTC units at 69 percent of HBCUs and 19 percent of MSIs.

The military departments have not developed a comprehensive approach for evaluating ROTC program contributions to a diverse officer corps, limiting their ability to inform decisions regarding any appropriate program modifications.

- The Navy and Air Force developed applicant goals—based on the eligible population—to evaluate the diversity of ROTC applicants, but the Army has not.
- These applicant goals do not share a consistent comparison group with the Department of Defense's (DOD) stated diversity goal to reflect the U.S. population.
- Each military department has conducted the required performance evaluations of ROTC units, but has not fully evaluated the extent to which the units contribute to a diverse officer corps.
- The military departments have not submitted the required resource documents to ensure resources are allocated effectively within the ROTC program or to determine whether—based on resources and performance—modifications to the program are advisable.

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Abbreviations

DOD	Department of Defense
HBCUs	Historically Black Colleges and
	Universities
HSIs	Hispanic-Serving Institutions
MSIs	Minority-Serving Institutions
OUSD (P&R)	Office of the Under Secretary of
	Defense for Personnel and
	Readiness
ROTC	Reserve Officers' Training Corps
STEM	Science, Technology, Engineering
	and Mathematics
USD (P&R)	Under Secretary of Defense for
	Personnel and Readiness

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U.S. GOVERNMENT ACCOUNTABILITY OFFICE

441 G St. N.W. Washington, DC 20548

August 24, 2023

The Honorable Jack Reed Chairman The Honorable Roger Wicker Ranking Member Committee on Armed Services United States Senate

The Honorable Mike Rogers Chairman The Honorable Adam Smith Ranking Member Committee on Armed Services House of Representatives

The Senior Reserve Officers' Training Corps (ROTC) is the largest source of U.S. military officers, producing more than one-third of all active-duty officers.¹ This training and scholarship program for post-secondary students is hosted at colleges and universities nationwide. The program has produced an average of more than 8,500 officers a year for a total of more than 94,000 officers from academic year 2011 through academic year 2021.² Typically, students enrolled in Army and Air Force ROTC programs are referred to as cadets, while students enrolled in Naval ROTC programs are referred to as midshipmen.³

²In addition to Senior ROTC, Junior ROTC is a Department of Defense (DOD)-funded program of instruction for high school-aged students administrated by the military departments (Army, Navy, and Air Force). A key purpose of Junior ROTC, according to 10 U.S.C. § 2031, is "to instill in students in United States secondary educational institutions the values of citizenship, service to the United States (including an introduction to service opportunities in military, national, and public service), and personal responsibility and a sense of accomplishment." Throughout our report, we refer to Senior ROTC as ROTC.

³Of the military services, the Army, Navy, and Air Force have ROTC programs. Naval ROTC midshipmen can elect to commission as a Marine Corps officer, and Air Force ROTC cadets can elect to commission as a Space Force officer.

¹While Senior ROTC is the largest source of commissioned officers, there are two other major commissioning sources—the military service academies and Officer Candidate School/Officer Training School. In addition, a small percentage of each service's officers come from direct commissions of individuals in occupations such as physicians, dentists, lawyers, and chaplains, as well as from Limited Duty Officer and Chief Warrant Officer programs.

Given its contribution to the production of military officers, ROTC can help the Department of Defense (DOD) cultivate a more diverse officer corps. According to a DOD report, the department is seeking to mirror the diversity of the U.S. population in its total workforce because diversity is key to innovation, inclusion and teamwork, and equality and joint force readiness.⁴ Further, the report states that compared with the serviceeligible U.S. population, the active component officer population is underrepresented by race and ethnicity. The Defense Advisory Committee on Diversity and Inclusion also noted in an October 2022 presentation that women were represented well below the service-eligible population. The DOD report also included recommendations that the department increase the pool of diverse candidates and adopt a datadriven strategy for providing access for and retaining candidates from diverse backgrounds. Additionally, the report recommended that the Service Chiefs provide the Secretary of Defense an annual review on diversity and inclusion and present to Congress an annual briefing on the state of diversity and inclusion in the areas of hiring, retention, development, promotion, and complaints.

We previously reported on the oversight and evaluation of ROTC programs. We found that half of ROTC units did not meet DOD's minimum requirement for average officer production over the 5-year period reviewed for the report, though each military service did meet at least 91 percent of its goal for officer production through ROTC.⁵ We also found that DOD's instructions for evaluating and closing ROTC units lacked clarity in some aspects, leading to inconsistent evaluation practices. The report included six recommendations to DOD, including the establishment of clearly defined performance measures and routine program evaluations; reexamination of oversight roles and responsibilities; and development of a strategy for communicating with Congress and other stakeholders on ROTC program performance. DOD concurred with each of these recommendations and, as of May 2023, DOD had taken action to address all six recommendations.

⁴Department of Defense Board on Diversity and Inclusion Report, *Recommendations to Improve Racial and Ethnic Diversity and Inclusion in the U.S. Military* (Dec. 15, 2020).

⁵GAO, *Military Personnel: Actions Needed to Improve Evaluation and Oversight of Reserve Officers' Training Corps Programs*, GAO-14-93 (Washington, D.C.; Nov. 13, 2013).

In May 2020, we reported on the trends in the number of personnel, promotion rates, and recruiting and retention among active-duty women.⁶ As part of this work, DOD stated that recruiting and retaining women is important in order to reflect the nation's population and ensure strong military leadership. We found, among other things, that recruiting is an important first step in building a diverse force. The report included five recommendations, including that DOD provide the military services with guidance to address recruitment and retention efforts for women. DOD concurred with these recommendations and has taken some actions to address them. However, four of the five recommendations have not yet been fully implemented.⁷

Senate Report 117-39, which accompanied a bill for the National Defense Authorization Act for Fiscal Year 2022, includes a provision for us to review the extent to which ROTC programs are contributing to a racially, ethnically, and socioeconomically diverse military officer corps.⁸ In our report, we (1) describe the trends from academic year 2011 through academic year 2021 in the racial, ethnic, and gender, and socioeconomic makeup of military officers commissioned through ROTC programs; (2) describe the distribution of ROTC units across U.S. colleges and universities and examine whether the racial, ethnic, and gender makeup of ROTC units aligned with the corresponding makeup of the school; and (3) assess the extent to which the military departments have evaluated and, as necessary, modified ROTC programs to better ensure they contribute to a diverse officer corps.

We included each military department's ROTC program in our review. For the first and second objectives, we obtained and analyzed individual-level ROTC enrollee and officer accession data, for the time period from

⁸S. Rep. No. 117-39, at 166-67 (2021).

⁶GAO, *Female Active-Duty Personnel: Guidance and Plans Needed for Recruitment and Retention Efforts*, GAO-20-61 (Washington, D.C.: May 19, 2020).

⁷The May 2020 report contains a priority recommendation for DOD to provide guidance to the military services in its diversity and inclusion strategic plan to develop plans, with clearly defined goals, performance measures, and timeframes to guide and monitor recruitment efforts for women who were active-duty service members. Priority recommendations are those that GAO believes warrant priority attention from heads of key departments or agencies. They are highlighted because, upon implementation, they may significantly improve government operations, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

academic year 2011 through academic year 2021,⁹ from each of the commands responsible for their respective military department's ROTC program: Army Cadet Command, Naval Service Training Command, and Air Education and Training Command. To describe racial and ethnic trends, we adhered to the Office of Management and Budget standards for maintaining, collecting, and presenting such data for all federal reporting purposes.¹⁰ However, due to the inconsistency in military department coding, we created a crosswalk to convert and consolidate race and ethnicity entries into a combined format as prescribed in these standards. Accordingly, we have reported demographic trends in the following race and ethnicity groups, in alphabetical order: American Indian or Alaska Native; Asian; Black or African American; Hispanic or Latino; Multiracial; Native Hawaiian or Other Pacific Islander; Unspecified; and White.¹¹ To describe gender trends, we calculated the number of officers who are men or women based on the categories listed in DOD guidance concerning the Diversity and Inclusion Management Program-male and female. To analyze socioeconomic trends, we reviewed ROTC enrollee data for the home of record addresses—prior to the enrollees' commissioning as officers—for academic year 2011 through academic year 2021 and then cross-referenced home of record addresses with data from the Census Bureau's American Community Survey 5-year estimates for 2017 through 2021.12

For the second objective, we calculated the population of demographic composition of each ROTC unit in terms of the race and ethnicity and gender categories described in the first objective. We then obtained the demographic attributes for the corresponding postsecondary institution's student population, as maintained in the Department of Education's

⁹We submitted data requests to the military departments from August through October 2022 and, at that time, the military departments did not have full data sets available for academic year 2022.

¹⁰Office of Management and Budget, *Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity* (Federal Register Volume 62, Number 210) (Thursday, Oct. 30, 1997).

¹¹In our analysis, the Multiracial category denotes an individual whose record indicates more than one race and the Unspecified category denotes an individual whose record is marked unknown or the race was not recorded.

¹²The American Community Survey 2017-2021 5-year estimates provide a wide range of important statistics, including socioeconomic indicators, about people and housing for every community in the nation. According to the Census Bureau, this survey was the only source of local estimates for most of the more than 40 topics it covers for communities across the nation. The 2017-2022 5-year estimates were the most recent available.

Integrated Postsecondary Education Data System.¹³ We then described the current geographic distribution of ROTC units at postsecondary institutions and the extent to which the gender, racial, and ethnic makeup of ROTC units was aligned with the corresponding makeup of the institution.

For the third objective, we reviewed DOD guidance concerning the administration and oversight of ROTC programs and the Diversity and Inclusion Management program.¹⁴ In addition, we reviewed the historical results of annual evaluations as collected by each military department. We then compared and evaluated these processes and results against requirements identified in the aforementioned DOD guidance concerning ROTC programs, goals identified in DOD strategic plans concerning diversity, equity, and inclusion, and federal internal control standards.

To assess the reliability of the data obtained from the military departments, we reviewed related documentation, for example, the data dictionaries associated with the respective files and conducted electronic data testing to look for missing and erroneous data. Based on these steps, we determined that these data were sufficiently reliable for the purposes of analyzing and describing trends in the racial and ethnic, gender, and socioeconomic makeup of military officers commissioned through ROTC programs.

For all three objectives, we interviewed officials from the Office of the Under Secretary of Defense for Personnel and Readiness (OUSD P&R), and each of the aforementioned commands responsible for administering their respective military department's ROTC program. Additionally, we interviewed officials from the Office for Diversity, Equity, and Inclusion (aligned under the Office of the Under Secretary of Defense for Personnel and Readiness) and diversity-related offices in the military departments. See appendix I for additional details on our objectives, scope, and methodology.

We conducted this performance audit from March 2022 to August 2023 in accordance with generally accepted government auditing standards.

¹³The Integrated Postsecondary Education Data System (IPEDS) is a system of interrelated surveys conducted annually by the U.S. Department of Education's National Center for Education Statistics. IPEDS collects data on postsecondary education in the United States in multiples areas, such as institutional characteristics and enrollment.

¹⁴Department of Defense Instruction 1215.08, *Senior Reserve Officers' Training Corps* (*ROTC) Programs* (Jan. 19, 2017) (change 1 effective Mar. 7, 2018); Department of Defense Instruction 1020.05, *DOD Diversity and Inclusion Management Program* (Sept. 9, 2020).

	Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.
Background	
Overview of ROTC Program	ROTC programs prepare postsecondary students for service as commissioned officers in the Army, Navy, Air Force, Marine Corps, or Space Force. Students can participate in ROTC courses at their educational institution at varying levels of commitment. For example, students can attend courses without formally enrolling in the ROTC program, or they can enroll officially. Students who enroll officially can do so as contract or non-contract cadets or midshipmen. Contract cadets or midshipmen make a commitment, if offered, to accept an appointment as a commissioned officer following their graduation and may receive scholarships and other financial assistance with their education. Non- contract cadets and midshipmen do not receive any financial assistance from DOD and have no obligation to serve following their graduation. Moreover, non-contract cadets and midshipmen can enroll in basic courses for only the first and second year of the ROTC program, rather than completing the entire four-year advanced course curriculum.
ROTC-related Roles and Responsibilities	The Under Secretary of Defense for Personnel and Readiness (USD (P&R)) oversees and manages ROTC programs for DOD, and is responsible for establishing overall policy and providing implementing guidance about the conduct, procedures, and administration of ROTC programs. ¹⁵ Additionally, through the Assistant Secretary of Defense for Manpower and Reserve Affairs, USD (P&R) is responsible for assessing and monitoring ROTC operations to ensure the cost-effective use of resources. USD (P&R) is also responsible for establishing policy and implementing DOD's Diversity and Inclusion Management program. This includes the design and implementation of a 5-year strategic plan for diversity and inclusion throughout DOD. ¹⁶
	The Secretaries of the Army, the Navy, and the Air Force are responsible for establishing, operating, monitoring, assessing, and disestablishing ROTC units. ¹⁷ They are also responsible for developing quantifiable
	¹⁵ DOD Instruction 1215.08.
	¹⁶ DOD Instruction 1020.05.
	17DOD Instruction 1215 09

¹⁷DOD Instruction 1215.08.

	performance measures for annual evaluations to assess the efficiency and effectiveness of each individual unit. The Army Cadet Command, Naval Service Training Command, and Air Education and Training Command operate their respective department's ROTC program.
Structure of ROTC Units	The military departments organize ROTC programs into units at accredited civilian postsecondary educational institutions—referred to as schools in the remainder of this report—which can provide a 2- or 4- year course of military instruction. Each ROTC host unit may support students at more than one school. In most of these cases, the unit's command staff is assigned to the school that has been designated as the host. Students enrolled at cross-town units affiliated with a host unit travel from their school to the host school to participate in ROTC activities.
	In some cases, though, an ROTC unit operates as an extension unit, rather than as a host or cross-town unit. ROTC extension units have an agreement with a military department and a host institution to maintain an ROTC presence away from the host institution. ¹⁸ In these arrangements, cadets or midshipmen at the extension units attend activities on their own campus that is staffed by the host ROTC unit either in a part or full time capacity.
	In addition to host, cross-town, and extension units, military departments also maintain a number of ROTC units in which resources are divided between more than one unit. This structure is intended to enable the participating units to share resources and improve efficiency. Units of this nature are referred to as consortium units.

¹⁸According to officials, Army ROTC does not consider schools with cross-town arrangements with a host unit as "units". For the purposes of this report, we have grouped extension units with cross-town units unless otherwise noted, and we have classified both types of arrangements (extension units and cross-town units) as units, in addition to host units. Throughout the report, "ROTC unit" can refer to a host unit, cross-town unit, or extension unit and is accompanied by an explanation of which unit type we refer to.

Distribution of Schools with ROTC Units

ROTC units are distributed at schools across the United States and selected territories, as shown in figure 1.

Figure 1: Map of Schools with at Least One Reserve Officers' Training Corps (ROTC) Unit of Any Type across U.S. States and Territories



Source: GAO analysis of military department data. | GAO-23-105857

Note: Additional information on ROTC units and their demographics can be viewed at (see interactive link).

There were 1,441 schools with an ROTC host, cross-town, or extension unit during academic year 2011 through academic year 2021.¹⁹ All states have at least one ROTC host unit. California has the greatest number of

¹⁹Information provided to us by the military departments showed there being 1,919 unique units. However, in order to link these units to IPEDS institutions, we combined units that were branch campuses of a larger institution into their home institution. As result, for our analysis of the data, we reported 1,441 schools with ROTC programs.

schools (154) with at least one unit of any type. Wyoming, the U.S. Virgin Islands, American Samoa, and Guam each have one school with at least one unit of any type. See table 1 for a list of the highest and lowest number of ROTC units by state or territory across all military departments.²⁰

Table 1: U.S. States and Territories with Highest and Lowest Number of Schools with at Least One or No Reserve Officers' Training Corps (ROTC) Unit of Any Type

State/territory	Number of schools with at least one ROTC unit of any type
California	154
New York	123
Pennsylvania	97
Texas	75
Ohio	57
_	
Alaska, North Dakota	3
American Samoa, Guam, U.S. Virgin Islands, Wyoming	1
Federated States of Micronesia, Marshall Islands, Northern Mariana Islands, Palau	0

Source: GAO analysis of military department data. | GAO-23-105857

Note: The "---" divides states and territories with the highest and lowest number of schools with at least one or no ROTC units of any type.

About 33.6 percent of all ROTC units are located in the South, which is higher than all other regions. The Northeast, Midwest, and West follow, with 24.5 percent, 20.6 percent, and 18.7 percent respectively. About 3 percent of all units are located in Guam, Puerto Rico, or other U.S. territories. The South also has the highest percentage of schools with at least one ROTC unit (32.1 percent). In Guam and the other U.S. territories, one-third of all schools have at least one ROTC unit. The Midwest and West have the lowest percentages of schools with at least one ROTC unit, at approximately 21.2 percent and 19.6 percent, respectively.

The states and territories with the highest average percentage of students who attended a school with an ROTC host unit between 2011 and 2021 were Alaska (84.5 percent), Guam (59.9 percent), Montana (50.7 percent), District of Columbia (49.0 percent), and North Dakota (48.5 percent). For the average percentage of students who attended a school with a cross-town unit, the top five states and territories are American Samoa (100 percent), U.S. Virgin Islands (100 percent), New Hampshire

²⁰See appendix II for more information.

(67.5 percent), Rhode Island (67.2 percent), and New York (67.1 percent). The states and territories with the highest average percentages of students who did not attend a school with ROTC are Wyoming (69.7 percent), West Virginia (66.5 percent), Maine (58.1 percent), Indiana (52.7 percent), and Illinois (52.5 percent).²¹

Some ROTC units are located at schools with a high percentage of certain racial and ethnic groups. For example:

- We use the term Minority-Serving Institution (MSI) for an institution of higher education whose enrollment of a single minority is over 25 percent of total enrollment or a combination of minorities is over 50 percent of total enrollment. In this context, a minority refers to American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Multiracial, Native Hawaiian or Other Pacific Islander, or other ethnic groups.²²
- A Historically Black College or University (HBCU) refers to an accredited university that was established prior to 1964 and whose principal purpose is the education of Black Americans.²³

Additionally, some ROTC units have cross-town agreements with women's colleges and universities. The National Center for Education Statistics within the Department of Education maintains a list of schools that the Women's College Coalition identifies as women's colleges. Such

²¹For Federated States of Micronesia, Marshall Islands, Northern Mariana Islands, and Palau, which do not have any ROTC units, the average percentage of students who attended a school without ROTC is 100 percent. See appendix II for additional information, including data for every state and territory.

²²Section 1067k(3) of Title 20, U.S. Code, defines a "minority institution" as an institution of higher education whose enrollment of a single minority or a combination of minorities (as defined in that section) exceeds 50 percent of the total enrollment. Section 1101a(a)(5) of Title 20, U.S. Code, defines a "Hispanic-serving institution" as an institution of higher education that is an eligible institution (as defined in that section) and has an enrollment of undergraduate full-time equivalent students that is at least 25 percent Hispanic students at the end of the award year immediately preceding the date of application. Finally, Office of Management and Budget guidance, which provides a minimum standard for maintaining, collecting, and presenting data on race and ethnicity for all Federal reporting purposes, lists the five categories for race as American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White. It includes two categories for data on ethnicity, Hispanic or Latino and Not Hispanic or Latino. Office of Management and Budget, Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity, 62 Fed. Reg. 58,782, 58,788-89 (Oct. 30, 1997). For purposes of this report, we have combined these definitions to better reflect the breadth of data collected.

²³See for example, 20 U.S.C. § 1061(2).

	schools have very high percentages of students who are women and very low percentages of students who are men.
Diversity-Related Executive Orders	Several Executive Orders promote diversity in the federal workforce, which includes DOD civilian and military personnel. For example:
	• Executive Order 13583 (August 2011), <i>Establishing a Coordinated</i> <i>Government-wide Initiative to Promote Diversity and Inclusion in the</i> <i>Federal Workforce</i> . This order sets requirements for departments and agencies to develop and implement strategic plans for diversity, among other things. ²⁴
	• Executive Order 13985 (January 2021), Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. Various sections of this order outline the need to study methods for assessing equity and conducting equity assessments within federal agencies. ²⁵
	• Executive Order 14035 (June 2021), <i>Diversity, Equity, Inclusion, and</i> <i>Accessibility in the Federal Workforce</i> . This order, among other things, directs the Office of Management and Budget, the Office of Personnel Management, and the Equal Employment Opportunity Commission to promote a data-driven approach to build upon current diversity reporting processes and instructs the heads of agencies to conduct a preliminary assessment of the current state of diversity, equity, inclusion, and accessibility in the agency's human resources practices and workforce composition. ²⁶
DOD and Military Department Diversity Efforts	DOD and the military departments have broad and varying definitions of diversity and have issued guidance on diversity efforts, as described below:
	• DOD . DOD defines "diversity" as all the different characteristics and attributes of individuals from varying demographics, which are consistent with our core values, integral to overall readiness and mission accomplishment, and reflective of the Nation we serve. The department issued guidance on diversity and inclusion in DOD
	²⁴ Exec. Order No. 13,583, <i>Establishing a Coordinated Government-wide Initiative to Promote Diversity and Inclusion in the Federal Workforce</i> , 76 Fed. Reg. 52,847 (Aug. 2011).
	²⁵ Exec. Order No. 13,985, <i>Advancing Racial Equity and Support for Underserved Communities Through the Federal Government</i> , 86 Fed. Reg. 7,009 (Jan. 20, 2021).
	²⁶ Exec. Order No. 14,035, <i>Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce</i> , 86 Fed. Reg. 34,593 (June 25, 2021).

Instruction 1020.05,²⁷ which establishes a specific goal of achieving a workforce that reflects the diverse population of the U.S.

- Army. The Army defines "diversity" as all attributes, experiences, cultures, characteristics, and backgrounds of the Total Force which are reflective of the Nation we serve and enable the Army to deploy, fight, and win. The Army has affirmed its intention to match the diversity of the U.S. population in *The Army People Strategy*.²⁸ One recent initiative toward this goal is the Army's Strategic Officer Recruiting Detachments, which facilitate enrollment of ROTC enrollees in Houston, Texas, and Los Angeles, California. These cities are particular areas of interest for the Army Cadet Command due to their potential for increasing diversity among ROTC enrollees.
- **Navy**. The Navy defines "diversity" as all the different characteristics and attributes of our Navy Team, which are consistent with Navy core values, integral to overall readiness and mission accomplishment and reflective of the Nation we serve. The Navy has similarly stated its intention to mirror the diverse population of the U.S. in recent guidance. For example, the *Task Force One Navy* report,²⁹ published in early 2021, outlines several recommendations that seek to enhance the Navy's efforts to recruit a diverse workforce. Some of these recommendations relate to ROTC specifically, while others would increase the diversity of the Navy overall. The Navy also published a memorandum in June 2022 that gave numeric targets for the applications the Navy would like to receive for Naval ROTC from various racial, ethnic, and gender groups in fiscal year 2023.³⁰ The memorandum states that these values are not quotas or limits, but rather representations of the number of required applications from each group to attain proportionality with the overall population of eligible candidates. According to Navy officials, targets aid in focusing prospecting, marketing, and advertising to ensure full penetration of all segments of the target market.

²⁷DOD Instruction 1020.05.

²⁸Department of the Army, *The Army People Strategy* (Oct. 2019); Department of the Army, *Yearly Comprehensive Analysis Summary Report – Military: Army, Fiscal Year* 2021 (2021).

²⁹Department of the Navy, *Task Force One Navy* (Jan. 2021).

³⁰Commander of the Navy Recruiting Command Notice 1131, *Fiscal Year 2023 Navy Reserve Officer Training Corps Application Goals* (June 16, 2022).

	• Air Force. The Air Force defines "diversity" as <i>including personal life experiences, geographic and socioeconomic backgrounds, cultural knowledge, educational background, work experience, language abilities, physical abilities, philosophical and spiritual perspectives, age, race, ethnicity, and gender</i> . ³¹ The Air Force has also developed a strategy to increase its diversity. For example, the Air Force ROTC National Recruiting Strategy for Academic Years 2021–2025 lists diversity as a priority, both generally and specifically in ROTC. ³² The Air Force also maintains applicant pool goals for certain racial, ethnic, and gender groups, though the goals apply to the entire pool of officers (which includes the Air Force Academy and other commissioning programs), not to ROTC alone. ³³
Population of ROTC- Commissioned Officers Has Become More Diverse and Increasingly from Economically Advantaged Areas Since Academic Year 2011	For academic year 2011 through academic year 2021, the racial and ethnic and gender makeup of ROTC-commissioned officers overall has become less White and has a lower percentage of men. Furthermore, the overall number of ROTC-commissioned officers who are White men has trended downward since academic year 2011. In addition, the percentage of ROTC-commissioned officers from economically advantaged counties has trended upward since academic year 2011. Lastly, the racial and ethnic and gender makeup from the most economically advantaged and the most economically disadvantaged counties has become more diverse every year since academic year 2011.
Racial and Ethnic and Gender Makeup of ROTC- Commissioned Officers Who Are White and Men Has Decreased Since Academic Year 2011	For academic year 2011 through academic year 2021, the population of ROTC-commissioned officers totaled more than 94,000, an average of more than 8,500 officers a year. Of this population, the number of White officers totaled approximately 66,000 (70.1 percent). During this period, the percentage of White officers decreased from 73.6 percent to 66.3 percent. As the White officer percentage decreased, the percentages of each of the next three largest populations—Black or African Americans, Hispanics or Latinos, and Asians—increased.
	³¹ Air Force Instruction 36-7001, <i>Diversity & Inclusion</i> (Feb. 19, 2019).

³²Department of the Air Force, *Air Force ROTC National Recruiting Strategy, Academic Years* 2021-2025 (Aug.18, 2021).

³³Department of the Air Force Memorandum, *Officer Source of Commission Applicant Pool Goals* (Aug. 9, 2022).

Furthermore, the number of officers who are men totaled approximately 73,000 (77.4 percent). The percentage of these officers decreased from 79.3 percent in academic year 2011 to 74.3 percent in academic year 2021. The percentage of officers who are women increased from 20.7 percent to 25.7 percent (see fig. 2).

Figure 2: Change in Percentage of Officers Commissioned through Reserve Officers' Training Corps (ROTC) Programs by Race and Ethnicity and by Gender, Academic Years 2011 through 2021



Source: GAO analysis of military department data. | GAO-23-105857

Notes: Multiracial denotes an individual whose record indicated more than one race. Unspecified denotes an individual whose record was marked unknown or race was not recorded.

For academic year 2011 through academic year 2014, Black or African Americans and Hispanics or Latinos were the second and third largest populations, respectively. For academic year 2015 through academic year 2021, the two populations changed places as Hispanics or Latinos became the second largest population and Black or African Americans became the third largest population.³⁴ The Asian population increased from 5.3 percent of the population in academic year 2011 to 6.9 percent in academic year 2021. Trends within each military department were generally consistent with the overall ROTC trends (see table 2).

Table 2: Change in Percentage of Officers Commissioned through Reserve Officers' Training Corps (ROTC) Programs across Military Departments, by Race and Ethnicity and Gender, Academic Years 2011 and 2021

	Race and ethnicity	2011	2021	Gender	2011	2021
Army	White	72.1	64.8	Men	79.7	74.0
	Black or African American	10.4	11.9	Women	20.3	26.0
	Hispanic or Latino	8.1	12.5			
	Asian	5.1	7.0			
Navy	White	81.9	73.3	Men	81.6	76.3
	Hispanic or Latino	4.8	8.0	Women	18.4	23.7
	Asian	3.9	6.6			
	Black or African American	2.8	4.0			
Air Force	White	73.4	67.5	Men	77.0	74.4
	Black or African American	7.1	5.5	Women	23.0	25.6
	Asian	6.8	6.4			
	Hispanic or Latino	6.6	11.3			

Source: GAO analysis of military department data. | GAO-23-105857

Note: The following populations are omitted because they constituted less than 5 percent of the overall population: American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander, Multiracial, and Unspecified.

Overall Number of ROTC-Commissioned Officers Who Are White Men Has Trended Downward Since Academic Year 2011 Analyzing the ROTC-commissioned officer population as an intersection of race and ethnicity and gender, we found that the number of White officers who were men totaled more than 53,000 for the entire period of academic year 2011 through academic year 2021.³⁵ During this period, the percentage of White officers who were men decreased from 60.8 percent in academic year 2011 to 51.4 percent in academic year 2021. As this percentage decreased, the percentages of each of the next three largest populations increased—White officers who were women from 12.8 percent to 14.9 percent, Hispanic or Latino officers who were men from

³⁴The change in the two populations reflected trends occurring in the Department of the Air Force.

³⁵Intersectionality is a framework for understanding how overlapping racial and ethnic and gender identities can affect individuals, in particular, for helping to understand diversity and socioeconomic status.

5.5 percent to 8.1 percent, and Black or African American officers who were men from 5.2 percent to 5.9 percent (see fig. 3).



Figure 3: Change in Percentage of Officers Commissioned through Reserve Officers' Training Corps (ROTC) Programs by Intersection of Race and Ethnicity and Gender, Academic Years 2011–2021

Source: GAO analysis of military department data. | GAO-23-105857

White men

Notes: "Intersectionality" is a framework for understanding how overlapping racial and ethnic and gender identities can affect individuals, in particular, for helping to understand diversity and socioeconomic status. Other demographic groups denotes the following populations—American Indian or Alaska Native men, American Indian or Alaska Native women, Native Hawaiian or Other Pacific Islander men, Native Hawaiian or Other Pacific Islander women, Multiracial men, Multiracial women, Unspecified men, and Unspecified women. The populations are combined for legibility—each population constituted less than one and a half percent of the overall population and thereby would not be visible. Multiracial denotes an individual whose record indicated more than one race.

Trends within each military department were generally consistent with the overall ROTC trends. In all three military departments, the second and third largest populations were White officers who were women and Hispanic or Latino officers who were men (see table 3).³⁶

Table 3: Change in Percentage of Officers Commissioned through Reserve Officers' Training Corps (ROTC) Programs across Military Departments, by Intersection of Race and Ethnicity and Gender, Academic Years 2011 and 2021

	Race and ethnicity and gender	2011	2021
Army	White men	60.1	50.1
	White women	12.0	14.7
	Hispanic or Latino men	6.1	8.3
	Black or African American men	6.2	7.4
	Asian men	4.1	5.4
	Black or African American women	4.2	4.5
	Hispanic or Latino women	2.0	4.1
	Asian women	1.0	1.6
Navy	White men	68.2	57.3
	White women	13.8	16.0
	Hispanic or Latino men	3.3	5.8
	Asian men	3.0	4.8
	Black or African American men	1.8	2.3
	Hispanic or Latino women	1.5	2.2
	Asian women	0.8	1.8
	Black or African American women	0.9	1.7
Air Force	White men	58.7	52.3
	White women	14.7	15.2

³⁶In the Department of the Air Force, the second and fourth largest populations in academic year 2011 increased—White officers who were women from 14.7 to 15.2 percent and Hispanic or Latino officers who were men from 4.9 to 8.4 percent, whereas the third largest population, Asian officers who were men, decreased from 5 percent in academic year 2011 to 4.8 percent in academic year 2021, becoming the fourth largest population by academic year 2021.

4.9	8.4
5.0	4.8
4.1	3.2
1.7	2.9
3.0	2.3
1.8	1.7
	5.0 4.1 1.7 3.0

Source: GAO analysis of military department data. | GAO-23-105857

Notes: "Intersectionality" is a framework for understanding how overlapping racial and ethnic and gender identities can affect individuals, in particular, for helping to understand diversity and socioeconomic status. The following populations are omitted because they constituted less than one percent of the overall population: American Indian or Alaska Native men, American Indian or Alaska Native women, Native Hawaiian or Other Pacific Islander men, Native Hawaiian or Other Pacific Islander women, Multiracial men, Multiracial women, Unspecified men, and Unspecified women. Multiracial denotes an individual whose record indicated more than one race. Unspecified denotes an individual whose record was marked unknown or race was not recorded.

Percentage of ROTC-Commissioned Officers from Economically Advantaged Counties Has Trended Upward Since Academic Year 2011

For academic year 2011 through academic year 2021, the percentage of officers from an economically advantaged county increased. An economically advantaged county is one where the household income is above the national median,³⁷ or the poverty rate is below the national average, or the unemployment rate is below the national average.³⁸ In academic year 2011 and academic year 2021, the number of ROTCcommissioned officers totaled 8,548 and 9,647, respectively. The number of officers from counties with a household income above the national median in academic year 2011 totaled 3,370, representing 39.4 percent of the population; this number totaled 4,543 in academic year 2021, representing 47.1 percent of the population, an increase of 7.7 percent. Furthermore, the number of officers from counties with a poverty rate below the national average in academic year 2011 totaled 3,853, representing 45.1 percent of the population; this number totaled 4,971 in academic year 2021, representing 51.5 percent of the population, an increase of 6.4 percent. Lastly, the number of officers from counties with an unemployment rate below the national average in academic year 2011 totaled 3,723, representing 43.6 percent of the population; this number

³⁷The counties are those that individuals listed as their homes of record.

³⁸"Average" is the amount calculated by dividing the total aggregate amount of a group by the number of units in that group. "Median" is the amount that divides a number of units into two equal groups by which the first half of the units are above the median and the second half of the units are below the median. While the average and median can be the same or nearly the same, they are different if more of the data values are clustered toward one end of their range or if there are a few extreme values, as in household incomes. In this case, the average can be significantly influenced by the few values, making it not very representative of the majority of the values in the data set. Under these circumstances, a median gives a better representation than an average.

totaled 4,572 in academic year 2021, representing 47.4 percent of the population, an increase of 3.8 percent (see fig. 4).



Figure 4: Change in Number of Officers Commissioned through Reserve Officers' Training Corps (ROTC) Programs Across Three Socioeconomic Indicators (Household Income, Poverty Rate, and Unemployment Rate), Academic Years 2011–2021

Source: GAO analysis of military department and American Community Survey data. | GAO-23-105857

Notes: Economically advantaged describes a county in which its median household income is above the national median or its poverty rate is below the national average or its unemployment rate is below the national average. Economically disadvantaged describes a county in which its median household income is below the national median, or its poverty rate is above the national average, or its unemployment rate is above the national average. Neither economically advantaged nor disadvantaged describes a county in which its median average. Neither economically advantaged nor disadvantaged describes a county in which its median household income is equal to the national median, or its poverty rate is equal to the national average, or its unemployment rate is equal to the national average, or its unemployment rate is equal to the national average, or its unemployment rate is equal to the national average.

Trends within each military department were generally consistent with the overall ROTC trends. For additional analyses on socioeconomic trends, see appendix II.

• **Army**. For academic year 2011 through academic year 2021, the percentage of officers from counties with a household income above the national median increased by 3.8 percentage points. Moreover,

the percentage of officers from counties with poverty rates and unemployment rates below the national average increased by 2.7 percentage points and by less than 1 percentage point, respectively.

- **Navy**. For academic year 2011 through academic year 2021, the Navy experienced the greatest increase of the three military departments in the percentage of officers from economically advantaged counties. During this period, the percentage of officers from counties with a household income above the national median increased by 28.4 percentage points. The percentage of officers from counties with poverty rates and unemployment rates below the national average increased by 28.2 percentage points and 20.9 percentage points, respectively.
- Air Force. For academic year 2011 through academic year 2021, the percentage of officers from counties with a household income above the national median increased by 8.7 percentage points. The percentage of officers from counties with poverty rates and unemployment rates below the national average increased by 6.2 percentage points and 4.7 percentage points, respectively.

Racial and Ethnic and Gender Makeup of Officers from the Most Economically Advantaged and Disadvantaged Counties Has Become More Diverse Every Year Since Academic Year 2011

For academic year 2011 through academic year 2021, about 27,000 ROTC-commissioned officers were from the most economically advantaged counties—that is, from counties where the household income is above the national median and the poverty rate is below the national average and the unemployment rate is below the national average concurrently. This represented approximately 29 percent of the total overall ROTC-commissioned officer population.

Analyzing this group of ROTC-commissioned officers, we found that White officers who were men constituted 64.2 percent in academic year 2011 and decreased to 56.9 percent in academic year 2021. As this percentage decreased, the percentages of the next three largest populations increased: White officers who were women from 15.0 percent to 16.0 percent; Asian officers who were men, from 4.2 percent to 6.4 percent; and Hispanic or Latino officers who were men from 3.5 percent to 5.0 percent (see fig. 5).

Figure 5: Change in Percentage of Officers Commissioned through Reserve Officers' Training Corps (ROTC) Programs in the Most Economically Advantaged Counties, by the Intersection of Race and Ethnicity and Gender, Academic Years 2011–2021



Source: GAO analysis of military department and American Community Survey data. | GAO-23-105857

Notes: "Intersectionality" is a framework for understanding how overlapping racial and ethnic and gender identities can affect individuals, in particular, for helping to understand diversity and socioeconomic status. Other demographic groups denotes the following populations: American Indian or Alaska Native men, American Indian or Alaska Native women, Native Hawaiian or Other Pacific Islander men, Native Hawaiian or Other Pacific Islander women, Multiracial men, Multiracial women, Unspecified men, and Unspecified women. The populations are combined for legibility—each population constituted less than one and a half percent of the overall population and thereby would not be visible. Multiracial denotes an individual whose record indicated more than one race. Unspecified denotes an individual whose record was marked unknown or race was not recorded. Most economically advantaged describes a county in which its median household income was above the national median, its poverty rate was below the national average, and its unemployment rate was below the national average concurrently.

During this same period, about 11,000 ROTC-commissioned officers were from the most economically disadvantaged counties—that is, from counties where the household income is below the national median and the poverty rate is above the national average and the unemployment rate is above the national average concurrently. This represented more than 12 percent of the total ROTC-commissioned officer population.

Analyzing this population, we found that White officers who were men constituted 50.0 percent of ROTC-commissioned officers in academic year 2011 and decreased to 41.1 percent in academic year 2021. As this percentage decreased, the percentages of the next two largest populations increased: Black or African American officers who were men, from 10.5 percent to 12.8 percent, and White officers who were women, from 9.2 percent to 10.8 percent. The fourth largest population, Black or African American officers who were women, decreased from 9.0 to 7.6 percent (see fig. 6).

Figure 6: Change in Percentage of Officers Commissioned through Reserve Officers' Training Corps (ROTC) Programs in the Most Economically Disadvantaged Counties, by the Intersection of Race and Ethnicity and Gender, Academic Years 2011–2021



Source: GAO analysis of military department and American Community Survey data. | GAO-23-105857

	Notes: "Intersectionality" is a framework for understanding how overlapping racial and ethnic and gender identities can affect individuals, in particular, for helping to understand diversity and socioeconomic status. Other demographic groups denotes the following populations: American Indian or Alaska Native men, American Indian or Alaska Native women, Native Hawaiian or Other Pacific Islander men, Native Hawaiian or Other Pacific Islander women, Multiracial men, Multiracial women, Unspecified men, and Unspecified women. The populations are combined for legibility—each population constituted less than one and a half percent of the overall population and thereby would not be visible. Multiracial denotes an individual whose record indicated more than one race. Unspecified denotes an individual whose record was marked unknown or race was not recorded. Most economically disadvantaged describes a county in which its median household income was below the national median, its poverty rate was above the national average, and its unemployment rate was above the national average concurrently.
	The socioeconomic makeup of ROTC-commissioned officers within each military department from the most economically advantaged and disadvantaged counties were generally consistent with the overall ROTC trends. Across all three military departments, the percentage of White officers who were men from the most economically advantaged counties was greater than the corresponding percentage from the most economically disadvantaged every year from academic year 2011 through academic year 2021. Furthermore, from both the most economically advantaged and disadvantaged counties, the percentage of White officers who were men decreased as a percentage of each population from academic year 2011 through academic year 2021 across all three military departments. In contrast, the only group to increase as a percentage of each of the three military departments' populations was Hispanic or Latino officers who were men.
ROTC Units Were Distributed at 1,441 Colleges and Universities, but Racial, Ethnic, and Gender Makeup of ROTC Units Did Not Always Align with Overall School	During academic year 2011 through academic year 2021, ROTC units were located at 1,441 schools. Most of these schools were located in counties with a relatively low percentage of White residents and a relatively high percentage of Black or African American and Hispanic or Latino populations, when compared with all U.S. counties. Schools with ROTC units had a slightly different racial, ethnic, and gender makeup than schools without ROTC units. On average, race, ethnicity, and gender composition of ROTC units were not aligned with their schools' diversity, most notably for gender. Finally, the military departments maintain ROTC units at HBCUs and MSIs and recruit officers of different racial and ethnic backgrounds from these schools.

Diversity

Most of the 1,441 Schools with ROTC Units Were Located in Counties with Higher Black or African American and Hispanic or Latino Populations

Schools with at least one ROTC unit for academic year 2011 through academic year 2021 were located in counties that rank relatively low in their White population and relatively high in their Black or African American, and Hispanic or Latino populations. Counties where schools with ROTC units were located varied in the relative size of their Asian population.³⁹

- About 5 percent of all schools with an ROTC unit are located in counties that rank in the top 25 percent of all counties for the percentage of their population that is White. The other approximately 95 percent of schools with an ROTC unit are located in counties at or below the 75th percentile for the White percentage of their population.
- Most schools with at least one ROTC unit are located in counties with relatively high Black or African American populations. Under 5 percent of all schools with at least one ROTC unit are located in counties that rank in the bottom 25 percent of all counties for the percentage of their population that is Black or African American. Approximately 53 percent of all schools fall between the 25th and 75th percentile for the percentage of Black or African American people in their population, and about 42 percent rank in the top 25 percent.
- More than 90 percent of all schools with an ROTC unit are located in counties above the 25th percentile of all counties for the percentage of their population that is Hispanic or Latino. About 9 percent of all schools with an ROTC unit are in counties that fall below the 25th percentile. Approximately 47 percent fall between the 25th and 75th percentiles, and about 44 percent rank in the top 25 percent.
- Schools with at least one ROTC unit are located in counties that vary in the relative size of their Asian population. Approximately 26 percent of all schools with an ROTC unit are in counties that fall in the bottom 25 percent of all counties, and about 51 percent fall between the 25th and 75th percentiles. About 23 percent of all schools with an ROTC unit are in a county that ranks in the top 25 percent of counties for the percentage of their population that is Asian.

³⁹Unless otherwise noted, all comparisons are statistically significant at the 90 percent confidence level. Unless otherwise noted, the confidence interval around these estimates does not exceed 4 percentage points. See appendix II for additional details.

ROTC Units Were Located at Schools with Differing Demographics from Schools without ROTC Units

The demographic makeup of the overall student population at schools with ROTC units varied slightly from schools without ROTC units. The population of enrollees in ROTC programs is a subset of the overall student population at their host schools (see fig. 7).⁴⁰





Source: GAO analysis of military department and Department of Education data. | GAO-23-105857

Schools with ROTC units also had a greater percentage of students who were men and a lower percentage of students who were women than schools without ROTC units (see fig. 8).

⁴⁰These racial categories reflect the data contained in IPEDS, though they are inconsistent with Office of Management and Budget guidance concerning the presentation of race and ethnicity data. According to Department of Education officials, this is due to institutional reporting needs.



Figure 8: Percentage of Students at Schools with and without Reserve Officers'

Training Corps (ROTC) Units, by Gender, Academic Years 2011–2021

ROTC Units Were Generally Less Diverse Than Their Schools, with Most Units Comprising **Primarily White Enrollees** and Enrollees Who Are Men

Many racial, ethnic, and gender groups were underrepresented on average in ROTC units compared with the overall student body of schools with ROTC units. Specifically, a majority of ROTC units from academic year 2011 through academic year 2021 were, on average, made up of primarily White enrollees and enrollees who were men, though units vary in their specific demographic composition. Black or African American, Native Hawaiian or Other Pacific Islander, and White students and students who are men were either over- or equally represented. White students and students who are men were particularly overrepresented (see fig. 9).

Figure 9: Percentage of Students at Schools with Reserve Officers' Training Corps (ROTC) Programs Compared with ROTC Enrollees, by Race and Ethnicity, Academic Years 2011–2021



Source: GAO analysis of military department and Department of Education data. | GAO-23-105857

- Across all three military departments, over half of ROTC units had an average of 50 percent or greater of White enrollees from academic year 2011 through academic year 2021. The Navy had the greatest percentage of ROTC units with an average of more than 50 percent of White enrollees, at approximately 72 percent. The Army had the second highest percentage, at about 66 percent, and the Air Force had the lowest, at about 58 percent. In contrast, the average percentage of White students at schools with ROTC units was approximately 52 percent. As a result, all three military departments had a percentage of units that exceeded the average percentage of White students in the student body, suggesting an overrepresentation of White enrollees in ROTC.
- Similarly, a majority of ROTC units across all military departments had an average of enrollees who are men that is higher than the percentage of enrollees who are men in the overall student body of schools with ROTC units. While about 44 percent of students at schools with ROTC units are men, a large majority of ROTC units were composed on average of more than 50 percent men, suggesting an overrepresentation of enrollees who are men in ROTC units.
- Native American or Alaska Native students participated in ROTC over the 11-year period in approximately equal percentages to the student population at schools with ROTC units. The percentage of students who are Native American or Alaska Native at schools with ROTC units was 0.57 percent. A large majority of ROTC units across all three military departments had no Native American or Alaska Native

enrollees, while some units had a greater average percentage that was still less than 1 percent.

- Native Hawaiian or Other Pacific Islander students make up a very small portion of the student body at schools with ROTC and within ROTC units themselves. Of students at schools with ROTC, 0.30 percent are Native Hawaiian or Other Pacific Islander. Their presence in ROTC units was higher at 0.67 percent. However, nearly all ROTC units had no Native Hawaiian or Other Pacific Islander enrollees in the 11-year period.
- Approximately 12 percent of all students at schools with ROTC units are Black or African American, and 14 percent of all ROTC enrollees are Black or African American. However, we found that the percentage of Black or African American ROTC enrollees varied widely by school. For example, we found that a majority of ROTC units had 10 percent or fewer Black or African American enrollees on average over the 11-year period.
- Similarly, a large percentage of ROTC units also had an average percentage of Hispanic or Latino enrollees over the 11-year period that was lower than the percentage of Hispanic or Latino students at schools with ROTC units. While about 19 percent of students at schools with ROTC units are Hispanic or Latino, a majority of ROTC units had an average percentage of Hispanic or Latino enrollees of 10 percent or less.
- Asian students also appear to be somewhat underrepresented in ROTC compared with their representation at schools with ROTC. About 7 percent of students at schools with ROTC units are Asian, but a majority of ROTC units had no Asian enrollees over the 11-year period.

Women were also underrepresented in ROTC units compared with their representation among all students at schools with ROTC units. Across the Army, Navy, and Air Force, about 11 percent, 12 percent, and 18 percent of units respectively had an average of over 50 percent of women over the 11-year period. In contrast, about 56 percent of students at schools with ROTC units are women (see fig. 10).

Figure 10: Percentage of Students at Schools with Reserve Officers' Training Corps (ROTC) Programs Compared with ROTC Enrollees, by Gender, Academic Years 2011–2021



Source: GAO analysis of military department and Department of Education data. | GAO-23-105857

Disparities between the racial, ethnic, and gender makeup of ROTC units and that of the overall student population may be due to other factors that influence one's interest in ROTC besides merely the presence of an ROTC unit at their school. For example, the military departments currently face a difficult recruiting landscape in which young people's interest in military service is declining, according to a July 2022 Army memorandum on recruitment and retention challenges.⁴¹ In the memorandum, the Army cited the following three reasons for this decreased interest:

- 1. A knowledge gap due to limited knowledge of, exposure to, or familiarity with the military.
- 2. An identity gap due to recruits' inability to "see themselves in the Army" because of assumptions about Army life and culture.
- 3. A trust gap, where young Americans have lost trust and confidence in American institutions generally, including in the military.

Army officials stated that certain gaps, or sources of declining interest in military service, might be more prominent among members of certain racial or ethnic groups. For example, the knowledge gap may be particularly significant among Hispanic or Latino potential recruits, according to Army officials. As a result, having an ROTC unit at one's school does not necessarily increase a person's propensity to serve, perhaps in particular because of their race, ethnicity, or gender.

⁴¹Department of the Army Memorandum, *A Call to Service to Overcome Recruiting and Retention Challenges* (July 20, 2022).
Military Departments Maintain ROTC Units at HBCUs and MSIs, Which Contribute to Diversity of ROTC Enrollee Population

The ROTC units maintained by the military departments at HBCUs and MSIs generally drew a more racially and ethnically diverse enrollee population. The military departments had a relatively high percentage of ROTC units at HBCUs serving about 69 percent or 72 of 104 HBCUs. The percentage of ROTC units at MSIs was lower than the percentage of MSIs without ROTC units, serving about 19 percent or 391 of 2,088 MSIs. Of all schools with at least one ROTC unit, about 5 percent are HBCUs, 27 percent are MSIs, and 68 percent are neither an HBCU nor an MSI. In comparison, among schools without an ROTC unit, 0.8 percent are HBCUs, 42 percent are MSIs, and 58 percent are neither an HBCU nor an MSI.

By military department, the percentage of units at each school type varied. For example, the Navy had the largest percentage of units at HBCUs (about 11 percent), while the Air Force had the highest percentage of its units at MSIs (about 31 percent). All of the military departments have over half of their ROTC units at schools that are not MSIs or HBCUs (see fig. 11 and table 4).





Neither HBCU nor MSI

Source: GAO analysis of military department and Department of Education data. | GAO-23-105857

Table 4: Reserve Officers' Training Corps (ROTC) Units at Historically Black Colleges and Universities (HBCUs) and Minority-Serving Institutions (MSIs) by Military Department, Academic Years 2011-2021

Military department	Percentage of units at HBCUs (Count)	Percentage of units at MSIs (excluding HBCUs) (Count)	Percentage of units at non-MSIs/HBCUs (Count)
Army	6.2% (69)	22.7 % (251)	71.1% (788)
Navy	10.8% (18)	21.6% (36)	67.7% (113)
Air Force	4.7% (49)	31.1% (322)	64.3% (666)
None (no ROTC unit) ^a	0.8% (32)	41.7% (1,697)	57.6% (2,344)

Source: GAO Analysis of military department and Department of Education data. | GAO-23-105857

^aSchools without an ROTC unit in the relevant categories are displayed for comparison.

About 74 percent of all host units are at schools that are not HBCUs or MSIs, compared with about 66 percent of all cross-town units that are not located at HBCUs or MSIs. About 19 percent of host units were at MSIs, while 29 percent of cross-town units were at MSIs. For HBCUs, though, in the instance of the Army and the Air Force, the percentage of cross-town units was roughly equal to the percentage of host units; both values were about 5 percent. As discussed previously, host units are staffed full time with staff assigned to their school. However, cross-town units do not have staff assigned and students who wish to participate in ROTC must travel to the associated host unit. According to officials, it is easier to establish cross-town agreements.

About 75 percent of Army host units were at neither an HBCU nor an MSI, compared with about 70 percent of cross-town units. In contrast to the 25 percent of Army cross-town units that were at MSIs, about 17 percent of host units were at MSIs. Alternatively, a greater percentage of Army host units were at HBCUs than at cross-town units. About 8 percent of Army host units were HBCUs, compared with about 6 percent of cross-town units.

Naval ROTC presence at HBCUs and MSIs does not vary greatly between host units and cross-town units. The breakdown of Naval ROTC units at HBCUs, MSIs, and other types of schools was nearly equal between hosts and cross-towns.

A large percentage of Black or African American and Hispanic or Latino officers came from HBCUs and MSIs. For example, about 35 percent of Black or African American ROTC enrollees who received a commission in the 11-year period came from an HBCU. About 42.3 percent of Hispanic or Latino officers came from an MSI that was not an HBCU. Among officers of all other races, about 28 percent came from an MSI other than an HBCU (see fig. 12).





Source: GAO analysis of military department and Department of Education data. | GAO-23-105857

Military Departments Have Not Fully Evaluated ROTC Units to Help Ensure They Contribute to a Diverse Officer Corps or to Inform Appropriate Modification Decisions The military departments have not developed a comprehensive approach for evaluating the ROTC programs' contributions to a diverse officer corps, limiting the military departments' ability to inform any appropriate modification decisions. The Navy and Air Force use numeric applicant pool goals to evaluate the diversity of the candidates they recruit to the ROTC program, but the Army has not developed such goals. However, our analysis of these goals found that DOD and the military departments are not using consistent comparisons to evaluate diversity progress. While each military department conducted required evaluations of established ROTC units, none of these evaluations collected or applied quantifiable diversity data that could position them to determine how these units contribute to a diverse officer corps. Lastly, the military departments' ROTC program modifications are not fully informed by performance evaluations. Navy and Air Force Have Developed Diversity-Related Goals to Evaluate Applicant Diversity, but the Army Has Not Developed Such Goals The Navy and the Air Force have developed applicant pool goals that outline notional targets for the number of officer applicants, including ROTC applicants, by race, ethnicity, or gender. Moreover, according to documentation related to the applicant pool goals, the goals are meant to inform progress toward diversity goals and provide data the two military departments can use to better align recruiting and marketing resources with goals.

- Navy. The Navy's ROTC applicant pool goals were published in June 2022 and were developed specifically for the Naval ROTC program. The goals include numeric targets for the number of MSI scholarships, nurses, African Americans, Asian or Pacific Islanders, Hispanics, and women. For example, the Navy's target for applications from people identifying as Hispanic is 268, and from women is 725. The applicant pool goals published by the Navy represent the number of applications from each demographic group that would be needed to be proportional with the eligible population of candidates. The Navy also emphasizes that these goals should not be interpreted as mandating or limiting the number of applications from any race, ethnicity, or gender. They are used to aid in understanding how well they are marketing in specific areas or to specific demographics.
- Air Force. The Air Force has had applicant pool goals in place for all active-duty officers since June 2014, with the latest goals being released in August 2022. Similar to the Navy, the Air Force's applicant pool goals for officers are based on the population eligible to serve as military officers, not the overall U.S. population. The Air Force sets numeric goals for applicants who are men and applicants who are women, as well as by race and ethnicity. For example, the most recent applicant pool goals are for 13 percent to be Black or African American and 1.5 percent to be American Indian or Native Alaskan. The Air Force also has applicant pool goals for Asians, Hispanic or Latinos, Native Hawaiian or Other Pacific Islanders, and Whites. The Air Force notes that the goals are aspirational and are used to align resources with objectives and will not be used in any manner to undermine their other merit-based processes.⁴²

The Army does not currently have applicant pool goals for ROTC. However, the Army's 2020 Army People Strategy states the intent to adapt military accession, recruiting, and retention programs in line with

⁴²For example, the Air Force selects cadets for the professional officer course based on performance related criteria, such as cumulative grade point average and officer gualification test scores, among other things.

demographic shifts projected by the Census Bureau.⁴³ The Army People Strategy also states that the Army will, in part, achieve its diversity, equity, and inclusion vision through five strategic goals that are supported by twenty-five objectives. One of these objectives is to create processes to measure the overall progress toward its vision. The Army People Strategy aims to help inform the Army's understanding of projected demographic shifts in the overall U.S. population and potentially where future recruiting efforts might be focused. However, it does not establish any quantifiable goals for diversity in the accession, recruiting, or retention programs. Furthermore, no comprehensive measurement process exists for the Army ROTC program.

In a July 2022 memorandum, the Secretary of the Army said America's military faces the most challenging recruiting environment since the All-Volunteer Force was established in 1973, driven in part by the post-COVID labor market, intense competition with the private sector, and a declining number of young Americans interested in uniformed service. This recruiting challenge could also have notable effects on the diversity efforts across the department as some studies suggest that propensity to serve can vary across racial, ethnic, and gender groups. The USD P&R noted the recruiting challenge during a March 2023 hearing before the House Armed Services Committee's Subcommittee on Military Personnel.⁴⁴ He also discussed comprehensive recommendations made by a 2020 report from DOD's Board on Diversity and Inclusion.⁴⁵ The report states that for DOD to build a diverse pipeline, its strategy must identify an aspirational applicant pool that enables DOD to tap into the broadest pool of diverse talent.

Army officials stated that diversity goals may imply numeric quotas. However, we have previously reported that goals are not quotas and that quantitative and qualitative performance measures help organizations translate their diversity aspirations into tangible practice.⁴⁶ Furthermore,

⁴⁵Department of Defense Board on Diversity and Inclusion, *Recommendations to Improve Racial and Ethnic Diversity and Inclusion in the U.S. Military* (Dec. 15, 2020).

⁴⁶GAO, *Female Active-Duty Personnel: Guidance and Plans Needed for Recruitment and Retention Efforts*, GAO-20-61, (Washington, D.C.: May 19, 2020).

⁴³Department of the Army, *Army People Strategy: Diversity, Equity, and Inclusion Annex* (Sept. 1, 2020).

⁴⁴Diversity, Equity, and Inclusion: Hearing on Impacts to the Department of Defense and the Armed Services before the House Armed Services Subcommittee on Military Personnel, 118th Cong. 2, 6 (2023) (statement of the Under Secretary of Defense for Personnel and Readiness).

	both the Navy and the Air Force have established such goals. Army officials stated that they have undertaken other efforts to improve officer corps diversity. For example, the Army has internship programs intended to improve ROTC participation from HBCUs by placing the best qualified armor and infantry first lieutenants at these locations. Similarly, to increase Hispanic ROTC enrollment at universities, the Army is placing the best qualified Spanish-speaking lieutenants to serve as cadre at schools with students from densely populated Hispanic locations.
	While these programs are likely helpful for the Army in its diversity efforts, they do not replace having measurable goals to evaluate progress toward the Army's overall objectives. Leading practices we identified for diversity management state that recruitment is a key process by which federal agencies attract a supply of qualified, diverse applicants for employment, and is the first step toward establishing a diverse workforce. ⁴⁷ The leading practices also state that quantitative and qualitative performance measures help organizations translate their diversity aspirations into tangible practice. Developing quantifiable goals for the diversity of applicants the Army is recruiting, such as ROTC applicant pool goals, will better position the Army to determine if its efforts to recruit a more diverse workforce are successful.
DOD and the Military Departments Have Not Used Consistent Comparisons to Evaluate Diversity Progress	DOD uses the diversity of the U.S. population as a point of comparison for diversity efforts. For example, various DOD guidance concerning diversity, equity, and inclusion states that the department's workforce should reflect the composition of the U.S. population. ⁴⁸ DOD's most recent Diversity, Equity, Inclusion and Accessibility Strategic Plan also states one goal is to narrow the demographic gaps between DOD and the U.S. population. However, the strategy provides little detail on what these gaps are, and does not elaborate on how they have been measured, or if the comparison is made to the overall population or only those eligible for military service.
	The Navy and Air Force base their applicant pool goals on the eligible population, not the overall U.S. population. According to Navy officials, this calculation is done with a regression analysis using officer production data to estimate the expected number of each demographic group from each county. The data are then aggregated at the national level, and the
	⁴⁷ GAO, <i>Diversity Management: Expert-Identified Leading Practices and Agency Examples,</i> GAO-05-90, (Washington, D.C.: Jan. 14, 2005).
	⁴⁸ DOD Instruction 1020.05, Department of Defense, <i>Diversity, Equity, Inclusion and</i>

⁴⁸DOD Instruction 1020.05, Department of Defense, *Diversity, Equity, Inclusion and Accessibility Strategic Plan Fiscal Years 2022-2023* (Oct. 2022).

Navy uses models from the American Community Survey, Qualified Military Available Estimates, and other sources. Similarly, the Air Force bases its calculation of the eligible population on an analysis tool developed for it by RAND Corporation.⁴⁹ As a result, the military departments are working toward diversity goals based on their calculation of the eligible population in contrast to DOD's guidance to reflect the U.S. population.

As an example of how the eligible population can look different than the overall U.S. population, DOD's Board on Diversity and Inclusion issued a report in 2020 that cited the eligible population for military officers—based on age and education—for Black or African Americans was 9 percent. Whereas, a 2021 U.S. Census Bureau estimate of the overall U.S. population for Black or African Americans was 13.6 percent. Moreover, the Army and the Air Force have indicated that comparisons with the U.S. population would be unhelpful because corresponding U.S. Census data do not exclude individuals who may be ineligible for service as a military officer.⁵⁰ For example, the U.S. Census counts both citizens and non-citizens, the latter of which may not be eligible to serve as a military officer.

Beyond age and education levels, there are additional eligibility requirements that can further highlight the differences between the racial, ethnic, and gender makeup of the overall U.S. population and those eligible for military service. For example, DOD and the military departments have eligibility requirements for military officers based on citizenship, physical fitness, height and weight, criminal record, drug or alcohol abuse, or certain medical conditions. According to a summary provided by a DOD Office of Public Affairs official, a 2020 DOD report found that 23 percent of all youth ages 17–24 were eligible for military service.⁵¹ The report's four largest disqualifying factors were weight, drug abuse, medical conditions, and mental health conditions. Of the 23

⁵¹Department of Defense, Under Secretary of Defense for Personnel and Readiness, *2020 Qualified Military Available (QMA) Study* (2020).

⁴⁹Berglund, Tiffany, "Impact of Eligibility Requirements and Propensity to Serve on Demographic Representation in the U.S. Air Force," *in Perspectives on Diversity, Equity, and Inclusion in the Department of the Air Force*, eds. Yeung, Douglas, and Lim, Nelson. Santa Monica, Calif.: RAND Corporation, PE-A909-1, 2021.

⁵⁰Department of the Army, Yearly Comprehensive Analysis Summary Report – Military: Army, Fiscal Year 2021 (2022); Department of the Air Force, Yearly Comprehensive Analysis Summary Report – Military SAF/DI – FY 2021 (2022).

percent of the population that were eligible, 11 percent were enrolled in college.

According to *Standards for Internal Control in the Federal Government*, management defines objectives in specific terms so they are understood at all levels of the entity. This involves clearly defining what is to be achieved, who is to achieve it, how it will be achieved, and the time frames for achievement. Management also defines objectives in measurable terms so that performance toward achieving those objectives can be assessed.⁵² Without establishing a consistent process to identify a comparison group for evaluating progress, such as whether they are striving toward the diversity of the U.S. population, the service-eligible population, or the U.S. population with the age and education required for service, DOD and the military departments may continue pursuing inconsistent diversity goals and risk not understanding when those goals are achieved.

Annual Performance Evaluations of ROTC Units Have Not Quantified Extent of Contributions to a Diverse Officer Corps The military departments' annual performance evaluations of their ROTC units do not quantify the extent of their contributions to a diverse officer corps. According to DOD guidance, the military departments are required to annually evaluate the effectiveness of their ROTC units.⁵³ They have conducted the required annual evaluations using criteria that fall under three primary categories (quality, demographics, and resources). According to DOD's guidance, the military departments are to use at least one of the criteria that fall under each of those categories, with diversity falling under the demographics category. However, DOD's guidance allows for discretion in applying any diversity criteria. Table 5 below outlines the categories and associated criteria that may be used in the annual evaluations.

⁵³DOD Instruction 1215.08.

⁵²GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Sept. 10, 2014).

Table 5: Criteria for Use in Military Department Annual Evaluations of Reserve Officers' Training Corps (ROTC) Units

Category	Criteria						
Quality	Standardized national or service-equivalent test scores; rates of signed versus completed scholarships, or other production standards; ROTC student rank within the university student body; the types of degree programs offered; and the university's academic ranking						
Demographics	Student diversity; institutional geography (i.e. location and market size); and the type of institution (public or private; Historically Black Colleges Universities or Ivy Leagues)						
Resources	The operation and maintenance costs of the unit, facility investments and improvements, the average cost per military officer produced, administrative and personnel costs compared with production rates, service- specific production or end strength constraints, staffing constraints, and administrative and morale support provided by the colleges or universities						

Source: Department of Defense Instruction 1215.08. | GAO-23-105857

Army Used the Designation of a School as an HBCU or as a Hispanic-Serving Institution as a Diversity-Related Criterion For reporting year 2021, the most recent year which complete data were available, the military departments differed in how they conducted these evaluations—including the extent to which they assessed ROTC unit diversity.⁵⁴ The Army and Navy applied different diversity-related criteria for these evaluations, but the criteria did not measure progress toward diversity goals. The Air Force did not apply diversity-related criteria in these evaluations. However, the military departments have not been required to apply diversity-related criteria to determine the extent to which ROTC units have contributed to a diverse officer corps.

For fiscal year 2014 through fiscal year 2021, the Army applied diversityrelated criteria, in addition to the required officer production criteria, and determined that from 39 to 59 units had not met officer production goals to be host units, but between 6 and 12 of these met criteria to be retained as extension units.⁵⁵ Army ROTC units that produce an average of 15 officers per year are retained as viable host units. If an Army ROTC host unit produces between 10 and 14 officers per year and meets certain exception criteria, they can also be retained as a host unit. Some examples of exceptions for host units are if the unit is located in a state whose population is underrepresented in Army commissioned officers or if it is the last Army ROTC unit at a public institution in the state.

⁵⁵The Acting Assistant Secretary of the Army for Manpower and Reserve Affairs approved the Army's ROTC unit assessment criteria in January 2014.

⁵⁴The military departments retained records for annual assessments for different time periods with the Army going back to fiscal year 2014, the Navy to school year 2017, and the Air Force to fiscal year 2019. According to Air Force officials, prior to 2019, the assessments were based solely on production numbers. DOD guidance changed in 2017 and, according to officials, the first assessments to be conducted using the new criteria occurred in 2019. The Air Force provided data for fiscal year 2022.

Army guidance allows ROTC extension units to be maintained that do not meet host unit officer production requirements if they are located at an HBCU or at a Hispanic-Serving Institution (HSI). There are additional exception criteria for extension units regarding cost per commissioned officer and sophomore and freshman retention rates, among others.

While the Army's exception criteria may improve or maintain the Army's presence within certain states and at HBCUs or HSIs, the Army does not currently quantify the impact of such exception criteria on diversity goals— —that is, the extent to which the ROTC units have contributed to a diverse officer corps. The Army does not fully evaluate ROTC program contributions to diversity as part of its annual evaluations because, according to DOD guidance, diversity is an optional assessment metric that has resulted in unclear implementation requirements.

For academic year 2017 through academic year 2021, the Navy applied diversity-related criteria, in addition to the required officer production criteria, and determined that from 14 to 17 Naval ROTC units were located at schools with below average racial, ethnic, or gender diversity. For its annual evaluations, the Navy uses nine criteria to evaluate Naval ROTC units, with four focused on quality, three on demography, and two on resources. According to Navy officials, they do not currently make a determination of whether a Naval ROTC unit is considered viable because all of their ROTC units have been meeting production goals. Rather, they assess each criteria as above average, average, or below average for a particular unit or host institution.

However, according to Navy guidance, if a Naval ROTC unit scores below average in any area, they may develop an improvement plan. If no measureable improvement is observed by the third year, the program could be recommended for closure by the Naval Service Training Command. The guidance also states that the Naval Service Training Command may not want to improve units in some instances because the range of evaluation scores help diversify the program's institutional portfolio, allowing for a more diverse profile of Naval ROTC midshipmen. For example, they may keep a unit open at a school with a low gender score because the unit has a high production rate.

Lastly, the Navy's evaluation criteria does not look at the diversity of the ROTC unit itself, only for the host school. While this method considers the diversity of the host school, it does not currently determine how a school's diversity may influence the diversity of Naval ROTC units, if at all. As previously discussed, our analysis showed that having ROTC units located at diverse institutions does not directly align with having an

Navy Used the Demographics of the School Hosting an ROTC Unit as a Diversity Criterion equally diverse ROTC unit. While the Navy has taken some positive steps to evaluate the diversity of the schools that host its ROTC units, its annual evaluation criteria do not allow it to quantify ROTC contributions to military officer diversity. The Navy does not fully evaluate ROTC program contributions to diversity as part of its annual evaluations because, according to DOD guidance, diversity is an optional assessment metric with no clear implementation requirements.

None of the Air Force's annual evaluation criteria evaluates racial, ethnic, or gender diversity of the host institution or ROTC unit. The Air Force evaluates its ROTC units against five criteria, including required officer production, officers with specific technical majors, or officers in desired aviation fields, as well as other quality and resource measures. According to Air Force officials, the current mix of evaluation criteria are those most critical to the Air Force's officer production requirements. Officials also said that each detachment's cadet population is a subset of the host institution and, therefore, unique in its particular demographic makeup. As mentioned above, our analysis found that ROTC units do not always reflect the diversity of their host school and, therefore, it may be unclear how Air Force ROTC units contribute to larger Air Force officer diversity efforts.

Moreover, the Air Force recently released its *Air Education and Training Command Diversity and Inclusion Outreach Plan* for officer applicants. The plan discusses the Air Force's diversity progress based on its applicant pool goals. It also describes three lines of effort with specific initiatives and barriers in recruiting, marketing, and outreach activities, as well as officer selection and classification testing. One of the recommendations of this plan is to pilot diversity-specific outreach, which would rely on an understanding of demographic profiles across specific campuses. However, the Air Force does not fully evaluate ROTC program contributions to diversity as part of its annual evaluations because, according to DOD guidance, diversity is an optional assessment metric with no clear implementation requirements.

According to DOD and military department officials, the focus of the annual evaluation is largely on how many officers each unit produces. Moreover, military department officials told us that there are other competing priorities that each military department must consider and balance with regard to its ROTC programs, in addition to achieving a racially, ethnically, and gender diverse candidate pool and officer corps. For example, the Navy and Air Force place a priority on technical or Science, Technology, Engineering and Mathematics (STEM) related

Air Force Has Not Used Diversity-Related Criteria in Its Evaluations

Military Departments Are Not Required to Collect Diversity Data and Determine the Degree to Which ROTC Units Have Contributed to a Diverse Officer Corps degrees.⁵⁶ However, this requirement can also have unintended impacts on diversity. DOD's Board on Diversity and Inclusion pointed out in its 2020 report that some low-income and minority populations are underrepresented in STEM education.⁵⁷ This circumstance may create a challenge for the military departments to balance a desire for both a STEM-educated and a racially, ethnically, and gender diverse ROTC population.

However, DOD has long emphasized the importance of workforce diversity as a goal.⁵⁸ Our prior work on effective strategic workforce planning states that agencies should periodically measure progress toward meeting human capital goals and the extent to which human capital activities contribute to achieving programmatic goals. Moreover, our work states that agencies should provide information for effective oversight by identifying performance shortfalls and appropriate corrective actions.⁵⁹ Further, leading practices we identified for diversity management state that quantitative and qualitative performance measures help organizations translate their diversity aspirations into tangible practice.⁶⁰ For example, an organization can track data on its workforce to evaluate the effectiveness of the organization's diversity management efforts and the progress it is making in those efforts.

The military departments, in their annual evaluations of ROTC units, have not quantified the extent of contributions to a diverse officer corps because the Office of the Under Secretary of Defense for Personnel and

⁵⁶According to a 2015 memorandum from the Secretary of the Navy, reinstating Naval Service Training Command Instruction 1533.3A and guidance from the Commander, Naval Service Training Command, the Navy places a priority on technical degrees requiring approximately 85 percent of Naval ROTC scholarships to be awarded to those pursuing technical degrees in a STEM field such as engineering. The goal is for each Naval ROTC graduating class to be composed of approximately 65 percent of graduates with technical degrees from a STEM field. The Air Force also has assessment criteria for the production of at least six commissions—based on a five-year average—for Air Force desired technical majors, many of which are also STEM fields. Similarly, the Army outlined a desire to meet or exceed the goal of 25 percent of its cadets commissioning with STEM degrees.

⁵⁷Department of Defense Board on Diversity and Inclusion Report, *Recommendations to Improve Racial and Ethnic Diversity and Inclusion in the U.S. Military* (Dec. 15, 2020).

⁵⁸Department of Defense, Diversity & Inclusion Strategic Plan 2012-2017 (2012).

⁵⁹GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, GAO-04-39, (Washington, D.C.: Dec. 11, 2003).

⁶⁰GAO, *Diversity Management: Expert-Identified Leading Practices and Agency Examples*, GAO-05-90 (Washington, D.C.: Jan. 14, 2005).

	Readiness (OUSD (P&R))—the office responsible for providing oversight and management of ROTC programs and establishing policy—has not developed guidance that requires the military departments to (1) collect and analyze ROTC units' demographic data as part of the annual evaluations and (2) use that data, not as viability criteria, but in a quantifiable way to evaluate the extent to which their ROTC units contribute to a diverse officer corps. OUSD (P&R) is also responsible for establishing policy and overseeing the implementation of the military departments' Diversity and Inclusion Management program, including the strategic plan for diversity and inclusion within DOD. ⁶¹
	According to DOD officials, the three-category system (quality, demographics, and resources) used to evaluate ROTC programs was designed to allow the military departments to tailor the criteria to their own specific needs and to give each host ROTC unit the best opportunity to be evaluated as viable. However, without DOD guidance requiring the military departments to (1) collect and analyze ROTC unit demographic data as part of the annual evaluations and (2) use that data, not as criteria, but in a quantifiable way to evaluate the extent to which their ROTC units contribute to a diverse officer corps, DOD and the military departments' decision-makers may not understand how individual ROTC units—and the large number of military officers they produce—impact broader diversity goals, such as by contributing to a diverse officer corps.
ROTC Program Modification Decisions Have Not Been Fully Informed by Performance Evaluations	While the military departments have conducted the required annual ROTC performance evaluations, the results of these evaluations have not included specific resource documents for the required planning, programming, and budgeting that could help inform any needed program modifications. DOD Instruction 1215.08 states that the military departments are required to submit annual forms outlining the costs associated with their ROTC programs and information on the number of scholarship and non-scholarship enrollments in relation to their end strength requirements. ⁶² According to the instruction, these forms are also intended to provide the basis for responding to both congressional and public inquiries. However, OUSD P&R could not provide any submitted forms since the publication of the requirement in January 2017. ⁶³ In November 2022, USD P&R subsequently directed the military

⁶¹DOD Instruction 1020.05.

⁶²DOD Instruction 1215.08; Department of Defense Form 2609, *Reserve Officers Training Corps Resources Summary Report* (Feb. 1, 2016); and Department of Defense Form 2611, *Reserve Officers Training Corps Enrollment Data* (Feb. 1, 2016).

⁶³DOD Instruction 1215.08.

departments to begin submitting these resource forms along with the annual performance evaluations.

DOD Instruction 1215.08 further states that all decisions to establish and maintain ROTC units will be based on the most efficient allocation of limited resources to meet the specific needs of the military department. However, from academic year 2011 through academic year 2022, the military departments established eight new ROTC host units and 20 new extensions or cross-town units, and closed one host unit because the hosting school closed.⁶⁴ The Navy established the most new ROTC units with five new host units and seven new cross-town units. Navy officials said that most of these new units were established as a result of either President Obama's charge for "The Ivies to get back to the military and the military to get back to the Ivies" in his 2010 State of the Union address, or based on congressional requests.

DOD and military department officials also stated that congressional opposition and annual statutory restrictions have deterred the military departments from making certain program modifications, specifically proposing the closure of underperforming ROTC units. For example, in October 2013, the Army announced a plan to realign its ROTC program by closing 13 units over a 2-year period. Subsequently, Congress passed legislation prohibiting the military departments from using any funds to close existing ROTC units.65 This provision was included in subsequent annual appropriations bills through fiscal year 2020. During this period, the military departments were not able to close units deemed underperforming or nonviable. This statutory limitation was removed after fiscal year 2020 and no longer limits the military departments' authority to modify ROTC programs through closure. However, according to officials, the military departments remain reluctant to close underperforming units. Additionally, according to officials, the past legislative prohibition diminished the importance of meeting military department evaluation criteria because the criteria could not be enforced.

In November 2013, we recommended that the Office of the Secretary of Defense and the military services establish systematic processes for the evaluation of ROTC program performance and clarify oversight

⁶⁴The Army also merged two ROTC units and three units agreed to become cross-towns. The Air Force does not currently have data on cross-towns.

⁶⁵Consolidation and Further Continuing Appropriations Act of 2015, Pub. L. No. 113-235, § 8138 (2014).

responsibilities.⁶⁶ Additionally, we recommended they develop a strategy to periodically communicate with Congress and other key stakeholders on ROTC program performance in an effort to build trusting relationships and gain buy-in for program modifications, such as closures. DOD concurred with and implemented these recommendations from 2018 through 2021. In March 2019, OUSD (P&R) provided a briefing to the House Armed Services Committee on ROTC program performance as required by a House Report accompanying the National Defense Authorization Act for Fiscal Year 2019.⁶⁷ According to a DOD official, this briefing contributed to the removal of the aforementioned statute prohibiting the closure of ROTC units.

Military department and DOD officials have indicated that the opening of new units without a subsequent closure of other units has resulted in a resource imbalance in some cases and, in others, made realigning ROTC resources more difficult. For example, according to officials, since academic year 2011, the military departments have not closed any ROTC host units, despite having a number of units that could be considered non-viable based on their approved evaluation criteria.⁶⁸ Figure 13 outlines the total number of ROTC units within each military department that could be considered non-viable based on the results of annual evaluations.

⁶⁶GAO, *Military Personnel: Actions Needed to Improve Evaluation and Oversight of Reserve Officers' Training Corps Programs,* GAO-14-93 (Washington, D.C.: Nov. 13, 2013).

⁶⁷H.R. Rep. No. 115-676, at 105 (2018).

⁶⁸One host unit closed because the academic institution itself closed, not as the result of actions by the military department. Additionally, Navy officials stated that they do not classify ROTC units as nonviable because they are all meeting their production goals.

Figure 13: Number of Reserve Officers' Training Corps (ROTC) Units That Could Be Considered Nonviable, 2014 through 2022



Source: GAO analysis of military department data. | GAO-23-105857

Notes: (1) The Navy classifies their ROTC units as below average, average, or above average. If marked as below average and no improvement is made, then the Secretary may determine that the unit is no longer a viable asset. (2) The military departments retained records for annual evaluations for different time periods with the Army dating back to fiscal year 2014, the Navy to academic year 2017, and the Air Force to fiscal year 2019. In the Air Force's case, according to officials, prior to 2019 the evaluations were based solely on production numbers because DOD guidance changed in 2017 and the first evaluations to be conducted using the new criteria occurred in 2019. The Air Force provided data for academic year 2022.

Officials from DOD and the military departments described difficulties in aligning ROTC resources because of previous challenges encountered when attempting to close underperforming ROTC units. For example, officials from the Army expressed a desire to realign ROTC units to follow U.S. population trends moving toward the Southwest given that the bulk of their units are located in the Northeast. The population in the Southwest also tends to have higher Hispanic or Latino representation. Yet, according to officials, they are reluctant to make any changes because of prior statutory restrictions on the closure of ROTC units, which would be necessary in order to open new units.

In our prior work, we found that an organization's activities, core processes, and resources must be aligned to support the mission of that organization and help it achieve its goals.⁶⁹ Such organizations start by assessing the extent to which their programs and activities contribute to meeting their mission and desired outcomes. However, DOD and the military departments have not fully evaluated the performance of individual ROTC units, including the allocation of resources to and across those units. As a result, DOD and the military departments are not fully informed to make decisions on whether to establish, close, or otherwise modify ROTC units based on both unit performance, including contributions to officer diversity, and resource allocation. Furthermore, DOD and the military departments have not used such information to take corrective actions to better achieve their desired objectives, including contributions to a diverse military officer corps. Without evaluating the effectiveness of and resource allocations for ROTC, the military departments may not make informed decisions to establish, close, or otherwise modify ROTC units, as appropriate, toward achieving ROTC program, military department, and DOD diversity goals.

DOD's ROTC program, the department's largest single source of military officers, can make significant contributions to DOD's efforts to improve diversity, having produced about 94,000 officers from academic year 2011 through academic year 2021. Since that time, overall, the racial and ethnic and gender makeup of ROTC-commissioned officers has become more diverse. However, officers who are men and those who are White are the two majority demographic populations. Moreover, ROTC-commissioned officers have increasingly come from areas with poverty and unemployment rates below the national average and household incomes above the national median. Further, on average, the race and ethnicity and gender for ROTC units have not aligned with their schools' diversity, most notably for gender. Finally, a 2022 Army memorandum notes that the military departments face a difficult recruiting landscape. The declining interest in military service—according to some studies—can vary across certain racial and ethnic and gender groups.

However, the military departments have not demonstrated a comprehensive approach for evaluating ROTC units to ensure that they contribute to a diverse officer corps. First, by establishing racial and ethnic and gender diversity applicant pool goals for ROTC like the Navy and the Air Force, the Army would be better positioned to evaluate its efforts to recruit a diverse workforce. Second, by establishing a consistent

Conclusions

⁶⁹GAO, *Executive Guide: Effectively Implementing the Government Performance and Results Act,* GAO/GGD-96-118 (June 1996).

	DOD-wide process to identify a comparison group for evaluating progress toward meeting DOD's diversity goals, DOD entities (including those overseeing ROTC programs) could better understand what is to be achieved and how. For example, with a consistent DOD-wide process DOD could better understand whether ROTC units and the officers they produce should reflect the diversity of the U.S. population, the service- eligible population, or the U.S. population with the age and education required for service. Third, by not requiring that the military departments (1) collect and analyze ROTC unit demographic data as part of the annual evaluations, and (2) use those data, not as criteria, but as means to evaluate ROTC contributions to a diverse officer corps, DOD is not positioned to determine the extent to which individual ROTC units and the military officers that they produce support broader DOD diversity goals. While we understand the need for flexibility in approach for managing ROTC units, evaluations can help an agency understand the extent to which its actions contribute to a goal—in this case the ROTC program's contributions to a diverse officer corps. Finally, by evaluating both the performance and resources of ROTC units and taking any corrective actions as appropriate, the military departments would be better positioned to make more fully informed decisions aimed at achieving ROTC program, military department, and DOD diversity goals.					
Recommendations for	We are making a total of four recommendations, including one to the Secretary of the Army and three to the Secretary of Defense.					
Executive Action	The Secretary of the Army should develop quantifiable ROTC diversity goals, such as applicant pool goals, that aid in the evaluation of Army efforts to recruit a diverse workforce. (Recommendation 1)					
	The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness, in coordination with the Secretaries of the military departments, establishes a consistent process to identify a comparison group to evaluate progress toward racial, ethnic, and gender diversity (i.e., whether to use the U.S. population, the service- eligible population, or the U.S. population with the age and education required for service for comparison). (Recommendation 2)					
	The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness develops guidance that requires the military departments to (1) collect and analyze ROTC unit demographic data as part of the annual evaluations, and (2) use those data, not as viability criteria, but as a means to evaluate ROTC contributions to a diverse officer corps. (Recommendation 3)					

	The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness requires the military departments to evaluate both the performance and resources of ROTC units and take any corrective actions, as appropriate, to better achieve ROTC program, military department, or DOD diversity goals. (Recommendation 4)
Agency Comments and Our Evaluation	We provided a draft of this report to DOD for review and comment. In its comments, reproduced in appendix III, DOD concurred with all four recommendations and noted a number of steps that it planned to take to address these recommendations. DOD provided technical comments, which we incorporated as appropriate.
	With respect to recommendation one that the Army should develop quantifiable diversity goals, such as applicant pool goals, that aid in the evaluation of Army efforts to recruit a diverse workforce, DOD stated that the Army has not established quantifiable ROTC diversity goals, but that the Army endeavors to achieve diversity at all ranks that reflect the nation. DOD further stated that to achieve this, the Army has increased targeted marketing to close diversity gaps to reach out to communities where large concentrations of needed diverse populations exist. We believe this is a positive step, but we continue to believe that developing quantifiable goals for the diversity of applicants the Army is recruiting would better position the Army to determine whether efforts to recruit a more diverse workforce are successful.
	With respect to recommendation three that DOD should develop guidance that requires the military departments to (1) collect and analyze ROTC unit demographic data as part of the annual evaluations and (2) use those data, not as viability criteria, but as a means to evaluate ROTC contributions to a diverse officer corps, DOD stated that the departments currently collect and aggregate demographic data for ROTC at the national level to measure progress toward supporting a diverse officer corps. Moreover, DOD stated that the Department of the Navy has included individual unit level diversity as one of nine criteria for their Naval ROTC annual assessments at the unit level, which is used to note areas for improvement, not to determine unit viability. However, as we point out in our report, the Navy's evaluation criteria does not consider the diversity of the ROTC unit itself, only the host school. We continue to believe that guidance is needed for collecting and analyzing data on the demographics of each individual ROTC unit as an important step in understanding the unit's contributions to diversity in the military officer corps. DOD stated that a common standard for collecting and analyzing individual ROTC unit demographics to support broader diversity objectives will be incorporated in the update and reissuance of DOD

Instruction 1215.08, which is expected to be completed in calendar year 2024. We note that collecting and analyzing the data is important, but those data should be used as a means to evaluate ROTC contributions to a diverse officer corps.

Regarding recommendation four that DOD require the military departments to evaluate both the performance and resources of ROTC units and take any corrective actions, as appropriate, to better achieve ROTC program, military department, or DOD diversity goals, DOD stated that they were considering taking a more active role to assist the military departments in evaluating the performance of ROTC units. It added that this might include supporting them in efforts to reallocate resources to new and emerging markets to improve their access to reach high-quality diverse officer candidates, particularly those pursuing highly technical degrees. DOD stated that the implementation of this recommendation will be considered in the pending update and reissuance of DOD Instruction 1215.08, which is scheduled to be completed in calendar year 2024. While DOD is determining how to best address this recommendation, we continue to believe that without evaluating the effectiveness of, and resource allocations for ROTC, the military departments may not make informed decisions to establish, close, or otherwise modify ROTC units, as appropriate, toward achieving ROTC program, military department, and DOD diversity goals.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Defense, the Secretary of the Army, the Secretary of the Navy, the Secretary of the Air Force, the Acting Commandant of the Marine Corps, and the Chief of Space Operations. In addition, this report is available at no charge on the GAO website at https://www.gao.gov.

If you or your staff have any questions regarding this report, please contact me at (202) 512-3604 or farrellb@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix IV.

Brenda & Janell

Brenda S. Farrell Director, Defense Capabilities and Management

Appendix I: Objectives, Scope, and Methodology

This report (1) describes trends from academic years 2011 through 2021 in the racial, ethnic, and gender, and socioeconomic makeup of military officers commissioned through Senior Reserve Officers' Training Corps (ROTC) programs;¹ (2) describes the distribution of ROTC units across U.S. colleges and universities and describes the extent to which the racial, ethnic, and gender makeup of ROTC units aligned with the corresponding makeup of the school; and (3) assesses the extent to which the military departments have evaluated and, as necessary, modified ROTC programs to better ensure that they contribute to a diverse officer corps.

To address these objectives, we focused our review on all individuals enrolled in each military department's ROTC programs across the U.S. and on all active-duty officers in all ranks and pay grades who commissioned through each military department's ROTC program. For the first and second objective, we obtained and analyzed individual-level ROTC enrollee and officer accession data, for the time period from academic year 2011 through academic year 2021,² from each of the commands responsible for their respective military department's ROTC programs: Army Cadet Command, Naval Service Training Command, and Air Education and Training Command. The individual-level record data included enrollment date, commission date, race and ethnicity, and gender. Military department officials informed us their respective departments do not collect data on an individual's socioeconomic status. (See below for information on how we determined an individual's socioeconomic status.)

To assess the reliability of the data obtained from the military departments, we reviewed related documentation, for example, the data dictionaries associated with the respective files, and we conducted electronic data testing to look for missing and erroneous data. Based on these steps, we determined that these data were sufficiently reliable for the purposes of analyzing and describing trends in the racial and ethnic, gender, and socioeconomic makeup of military officers commissioned through ROTC programs.

For the first objective, we calculated the population of enrollees who commissioned as officers and their demographic composition in terms of

¹Throughout our report we use ROTC to refer to Senior ROTC.

²We submitted data requests to the military departments from August through October 2022 and, at that time, the military departments did not have full data sets available for academic year 2022.

race, ethnicity, gender, and socioeconomic status. To describe racial and ethnic trends, we adhered to the Office of Management and Budget standards for maintaining, collecting, and presenting such data for all federal reporting purposes.³ Office of Management and Budget standards identify the following five race groups:

- 1. American Indian or Alaska Native
- 2. Asian
- 3. Black or African American
- 4. Native Hawaiian or Other Pacific Islander
- 5. White

Furthermore, Office of Management and Budget standards identify the following two ethnic groups:

- 1. Hispanic or Latino
- 2. Not Hispanic or Latino

Due to the inconsistency in military department coding of race and ethnicity, we created a crosswalk to convert and consolidate race and ethnicity entries into a combined format as prescribed in the aforementioned Office of Management and Budget standards. The consolidation enabled the comparison of the Hispanic or Latino population with other populations. Accordingly, we have reported demographic trends in the following race and ethnicity groups:

- 1. American Indian or Alaska Native
- 2. Asian
- 3. Black or African American
- 4. Hispanic or Latino
- 5. Multiracial
- 6. Native Hawaiian or Other Pacific Islander
- 7. Unspecified
- 8. White

³Office of Management and Budget, *Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity* (Federal Register Volume 62, Number 210) (Oct. 30, 1997).

In our analysis, the Multiracial category denotes an individual whose record indicates more than one race and the Unspecified category denotes an individual whose record is marked unknown or the race was not recorded. To describe gender trends, we calculated the number of officers who are men or women based on the categories listed in Department of Defense (DOD) guidance concerning the Diversity and Inclusion Management Program—that is male and female.

As stated above, the military departments do not collect data on an individual's socioeconomic status. Accordingly, to determine an individual's socioeconomic status, we obtained individual-level home of record data for all ROTC enrollees. We then identified and appended to these records the corresponding counties' socioeconomic attributes as collected via the American Community Survey 5-year estimates for 2017 to 2021.⁴

We selected for analysis three socioeconomic attributes:

- 1. Average poverty rate
- 2. Average unemployment rate
- 3. Median household income⁵

We then compared and described the results in terms of "economically advantaged," "economically disadvantaged," or "neither economically advantaged nor disadvantaged;" and "most economically advantaged" and "most economically disadvantaged".

Specifically, if an individual's home of record was in a county where 1) the poverty rate was below the national average; or 2) the unemployment rate was below the national average; or 3) the median household income was above the national median, then we described the area as "economically

⁵Average is the amount calculated by dividing the total aggregate amount of a group by the number of units in that group. Median is the amount that divides a number of units into two equal groups by which the first half of the units are above the median and the second half of the units are below the median. While the average and median can be the same or nearly the same, they are different if more of the data values are clustered toward one end of their range or if there are a few extreme values, as in household incomes. In this case, the average can be significantly influenced by the few values, making it not very representative of the majority of the values in the data set. Under these circumstances, a median gives a better representation than an average.

⁴The American Community Survey 2017–2021 5-year estimates provide a wide range of important statistics, including socioeconomic indicators, about people and housing for every community in the nation. According to the Census Bureau, this survey was the only source of local estimates for most of the more than 40 topics it covers for communities across the nation. The 2017-2022 5-year estimates were the most recent available.

advantaged." Conversely, if an individual's home of record was in a county where (1) the poverty rate was above the national average; or (2) the unemployment rate was above the national average; or (3) the median household income was below the national median, then we described the area as "economically disadvantaged." Lastly, if an individual's home of record was in a county where (1) the poverty rate was below the national average; and (2) the unemployment rate was below the national average; and (3) the median household income was above the national median concurrently, then we described the area as "most economically advantaged." Conversely, if an individual's home of record was in a county where (1) the poverty rate was above the national average; and (3) the median household income was above the national median concurrently, if an individual's home of record was in a county where (1) the poverty rate was above the national average; and (3) the median household income was above the national average; and (3) the median household income was above the national average; and (3) the unemployment rate was above the national average; and (3) the median household income was below the national average; and (3) the median household income was below the national average; and (3) the median household income was below the national average; and (3) the median household income was below the national average; and (3) the median household income was below the national median, concurrently, then we described the area as "most economically disadvantaged."

For the second objective, we calculated demographic composition of each ROTC unit in terms of the race and ethnicity and gender categories described in the first objective. We then obtained from each military department a list of all ROTC units (host, cross-town, extension, or consortium) at postsecondary institutions across the United States. The list included the postsecondary institution's name, city, state or territory, and zip code. We then appended to the list of ROTC units the demographic attributes for the corresponding postsecondary institution's student population, as maintained in the Department of Education's Integrated Postsecondary Education Data System,⁶ as well as the demographic attributes of the corresponding county, as collected via the aforementioned American Community Survey estimates. We described the current geographic distribution of ROTC units at postsecondary institutions and the extent to which the gender, racial, and ethnic makeup of ROTC units was aligned with the corresponding makeup of the institution and county.

For the third objective, we reviewed DOD guidance concerning the administration and oversight of ROTC programs, specifically the process and standards for evaluating an ROTC unit.⁷ In addition, we reviewed the

⁷DOD Instruction 1215.08.

⁶The Integrated Postsecondary Education Data System is a system of interrelated surveys conducted annually by the U.S. Department of Education's National Center for Education Statistics. The Integrated Postsecondary Education Data System collects data on postsecondary education in the United States in multiples areas, such as institutional characteristics and enrollment.

historical results of these evaluations as collected by each military department. Furthermore, we reviewed the aforementioned DOD guidance concerning the Diversity and Inclusion Management Program, specifically procedures for data collection and reporting requirements to measure and validate the progress and effectiveness of departmental efforts.⁸ Additionally, we reviewed DOD strategic plans concerning diversity, equity, and inclusion as well as the DOD Board on Diversity and Inclusion recommendations concerning recruitment and accessions.⁹ We then compared and evaluated these processes and results against (1) requirements identified in the aforementioned DOD guidance concerning ROTC programs; (2) goals identified in DOD strategic plans concerning diversity, equity, inclusion, and accessibility; (3) recommendations in the DOD board report; and (4) principles outlined in the *Standards for Internal Control in the Federal Government*.¹⁰

For all three objectives, we interviewed officials from the Office of the Under Secretary of Defense for Personnel and Readiness, the Defense Manpower Data Center, and each of the commands responsible for administering their respective military department's ROTC programs—the Army Cadet Command, the Naval Service Training Command, and the Air Education and Training Command. Additionally, we interviewed officials from the Office for Diversity, Equity, and Inclusion (aligned under the Office of the Under Secretary of Defense for Personnel and Readiness) and diversity-related offices in the military departments: the Army Equity and Inclusion Agency; the Office of the Assistant Secretary of the Navy, Manpower and Reserve Affairs, Diversity Equity and Inclusion; and the Air Force Office of Diversity and Inclusion.

We conducted this performance audit from March 2022 to August 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that

⁸DOD Instruction 1020.05.

⁹Department of Defense, *Diversity and Inclusion Strategic Plan 2012-2017*, (2012). Department of Defense, *Diversity, Equity, Inclusion, and Accessibility Strategic Plan Fiscal Years 2022-2023*, (Sept. 30, 2022). Department of Defense Board on Diversity and Inclusion, *Recommendations to Improve Racial and Ethnic Diversity and Inclusion in the U.S. Military*, (Dec. 15, 2020).

¹⁰GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sept. 10, 2014).

the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Additional Demographic Analyses

The following analyses provide detailed data on the demographic and socioeconomic trends for each year during the time period from academic year 2011 through academic year 2021. Furthermore, the following analyses provide information on county demographic data, states and territories with schools with Reserve Officers' Training Corps (ROTC) programs by military department, and students in each state and territory who attend a school with ROTC programs.

Demographic Analysis of Officers Commissioned through ROTC Programs for Academic Years 2011– 2021

For academic year 2011 through academic year 2021, the White officer population decreased from 73.6 percent to 66.3 percent. Similarly, the percentage of these officers who are men decreased from 79.3 percent in academic year 2011 to 74.3 percent in academic year 2021, whereas the percentage of officers who are women increased from 20.7 percent to 25.7 percent (see table 6).

 Table 6: Change in Percentage of Officers Commissioned through Reserve Officers' Training Corps (ROTC) Programs by

 Race and Ethnicity and Gender, Academic Years 2011 through 2021

		2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Race and ethnicity	White	73.6	73.9	73.1	72.5	70.6	69.5	69.8	67.7	68.0	66.6	66.3
	Black or African American	8.7	8.5	8.9	8.6	9.0	9.5	8.9	9.5	9.3	9.6	9.6
	Hispanic or Latino	7.3	8.0	8.0	8.5	9.7	9.9	10.1	10.3	11.0	11.9	11.7
	Asian	5.3	4.9	5.0	5.6	5.6	6.4	6.0	6.8	6.7	6.5	6.9
	Multiracial	1.9	1.6	1.8	1.8	2.2	2.0	2.3	2.2	2.2	2.2	2.2
	Unspecified	1.9	2.0	2.2	1.9	1.8	1.8	1.9	2.4	2.0	2.1	2.4
	Native Hawaiian or Other Pacific Islander	0.7	0.6	0.6	0.6	0.5	0.5	0.6	0.7	0.5	0.5	0.5
	American Indian or Alaska Native	0.5	0.5	0.4	0.4	0.5	0.4	0.3	0.4	0.3	0.5	0.3
Gender	Men	79.3	79.0	78.1	78.4	77.8	78.0	77.1	76.8	77.1	76.0	74.3
	Women	20.7	21.0	21.9	21.6	22.2	22.0	22.9	23.2	22.9	24.0	25.7

Source: GAO analysis of military department data. | GAO-23-105857

Demographic Analysis of Officers Commissioned through ROTC Programs by Intersection of Race and Ethnicity and Gender for Academic Years 2011– 2021

For academic year 2011 through academic year 2021, the population of officers who were White men decreased from 60.8 percent to 51.4 percent. As the population of officers who were White men decreased, each of the next three largest populations increased—White women from 12.8 percent to 15.0 percent, Hispanic or Latino men from 5.5 percent to 8.1 percent, and Black or African American men from 5.2 percent to 5.9 percent (see table 7).

 Table 7: Change in Percentage of Officers Commissioned through Reserve Officers' Training Corps (ROTC) Programs by

 Intersection of Race and Ethnicity and Gender, Academic Years 2011–2021

		2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Race and ethnicity and gender	White men	60.8	60.8	59.1	58.9	57.7	56.3	55.7	54.3	54.5	52.9	51.4
	White women	12.8	13.1	14.0	13.6	13.0	13.2	14.2	13.5	13.5	13.8	15.0
	Hispanic or Latino men	5.5	5.9	5.9	6.2	6.8	7.1	7.1	6.9	7.9	8.3	8.1
	Black or African American men	5.2	5.2	5.7	5.6	5.6	6.3	5.9	6.3	6.1	6.2	5.9
	Asian men	4.1	3.7	3.8	4.4	4.2	5.0	4.6	5.2	5.1	4.9	5.2
	Black or African American women	3.5	3.3	3.2	3.0	3.4	3.2	3.1	3.2	3.2	3.4	3.7
	Hispanic or Latino women	1.9	2.2	2.2	2.3	2.9	2.8	3.0	3.4	3.1	3.6	3.7
	Unspecified men	1.5	1.4	1.7	1.4	1.4	1.2	1.4	1.9	1.5	1.5	1.7
	Multiracial men	1.4	1.2	1.2	1.2	1.5	1.5	1.8	1.5	1.6	1.6	1.5
	Asian women	1.2	1.2	1.1	1.2	1.5	1.4	1.5	1.6	1.6	1.7	1.7
	Multiracial women	0.5	0.4	0.6	0.7	0.7	0.5	0.6	0.7	0.6	0.7	0.7
	Native Hawaiian or Other Pacific Islander men	0.5	0.5	0.5	0.4	0.3	0.3	0.4	0.6	0.3	0.4	0.3
	Unspecified women	0.5	0.6	0.5	0.5	0.4	0.5	0.5	0.6	0.6	0.6	0.7
	American Indian or Alaska Native men	0.4	0.4	0.3	0.4	0.4	0.3	0.3	0.3	0.3	0.3	0.3
	Native Hawaiian or Other Pacific Islander women	0.2	0.2	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.1	0.2

Source: GAO ar	WOMEN	GAO-23-1058	57									
	American Indian or Alaska Native	0.1	0.2	0.2	0.1	0.1	0.1	0.0	0.1	0.1	0.2	0.1

Socioeconomic Analysis of Officers Commissioned through ROTC Programs by Military Department, Academic Years 2011– 2021 For academic year 2011 through academic year 2021, the percentage of officers from economically advantaged counties across all three indicators—a household income above the national median and poverty and unemployment rates below the national average—increased by 7.7, 6.4, and 3.8 percentage points, respectively. The socioeconomic makeup of ROTC-commissioned officers within each military department were generally consistent with these overall trends (see table 8).

Table 8: Change in Percentage of Officers Commissioned through Reserve Officers' Training Corps (ROTC) Programs acrossMilitary Departments, and by Socioeconomic Indicators (Household Income, Poverty Rate, Unemployment Rate), AcademicYears 2011 and 2021

Military Department	Socioeconomic Indicator		2011	2021
Army	Household income	Greater than the national median	40.3	44.1
		Equal to the national median	7.5	7.2
		Less than the national median	50.5	46.8
		No data available	1.7	1.8
	Poverty	Greater than the national average	35.7	33.9
		Equal to the national average	14.6	13.7
-		Less than the national average	46.7	49.4
		No data available	3.0	3.0
	Unemployment	Greater than the national average	24.4	23.9
		Equal to the national average	29.0	29.0
		Less than the national average	44.8	45.2
		No data available	1.7	1.9
Navy	Household income	Greater than the national median	34.9	63.3
		Equal to the national median	3.8	4.6
		Less than the national median	20.5	29.2
		No data available	40.9	2.9
	Poverty	Greater than the national average	14.8	22.6
		Equal to the national average	6.9	8.9
		Less than the national average	37.4	65.6
		No data available	40.9	2.9

	Unemployment	Greater than the national average	11.3	19.7
		Equal to the national average	15.4	24.2
		Less than the national average	32.4	53.3
		No data available	40.9	2.9
Air Force	Household income	Greater than the national median	39.5	48.2
		Equal to the national median	7.3	6.4
		Less than the national median	48.3	42.4
		No data available	4.9	3.1
	Poverty	Greater than the national average	34.5	31.2
		Equal to the national average	15.3	13.6
		Less than the national average	44.8	51.0
		No data available	5.3	4.2
	Unemployment	Greater than the national average	21.3	20.8
		Equal to the national average	27.4	25.1
		Less than the national average	46.3	51.0
		No data available	4.9	3.1

Source: GAO analysis of military department and American Community Survey data. | GAO-23-105857

Socioeconomic Analysis of ROTC-Commissioned Officers by Intersection of Race and Ethnicity and Gender for Academic Years 2011–2021 For academic year 2011 through academic year 2021, in the most economically advantaged counties, White men constituted 64.2 percent of ROTC-commissioned officers in 2011 and decreased to 56.9 percent in 2021. As the percentage of White officers who are men decreased, the percentages of the next three largest populations increased—White women from 15.0 to 16.0 percent, Asian men from 4.2 to 6.4 percent, and Hispanic or Latino men from 3.5 to 5.0 percent. Similarly, during this same period, in the most economically disadvantaged counties, White men constituted 50.0 percent of ROTC-commissioned officers in 2011 and decreased to 41.1 percent in 2021. As the population of White officers who are men decreased, each of the next three largest populations increased—Black or African American men from 10.5 to 12.8 percent, White women from 9.2 to 10.8 percent, and Hispanic or Latino men from 7.3 to 11.4 percent. The fourth largest population, Black women, decreased from 9.0 to 7.6 percent (see table 9).

Table 9: Change in Percentage of Officers Commissioned through Reserve Officers' Training Corps (ROTC) Programs in Most Economically Advantaged and Disadvantaged Counties Across Military Departments, by the Intersection of Race and Ethnicity and Gender in the Most Economically Advantaged and Most Economically Disadvantaged Counties, Academic Years 2011 through 2021

		2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Most Economically Advantaged	White men	64.2	65.4	62.9	63.0	63.0	61.8	60.7	57.9	59.1	57.8	56.9
	White women	15.0	13.3	16.4	15.6	14.4	15.2	15.7	15.0	14.5	15.1	16.0
	Asian men	4.2	5.2	4.4	5.2	5.1	5.7	5.4	6.7	5.8	5.1	6.4
	Hispanic or Latino men	3.5	3.5	3.3	3.2	4.4	4.2	4.3	4.5	5.9	5.9	5.0
	Black or African American men	3.0	3.1	3.1	3.6	3.1	3.5	3.3	3.5	3.0	4.3	3.7
	Black or African American women	2.1	2.0	1.6	1.0	1.5	1.5	1.7	1.5	2.1	1.9	2.1
	Unspecified men	1.8	1.2	1.8	1.8	1.3	1.2	1.5	2.2	1.5	1.5	1.6
	Asian women	1.4	1.5	1.6	1.6	1.8	1.7	1.6	2.1	1.8	1.8	2.0
	Hispanic or Latino women	1.3	1.4	1.8	1.6	1.8	1.8	2.1	2.5	2.1	2.6	2.2
	Multiracial men	1.3	1.2	1.1	1.3	1.7	1.7	1.7	1.8	1.7	1.7	1.7
	Multiracial women	0.6	0.4	0.6	0.8	0.8	0.5	0.6	0.4	0.9	0.8	0.7
	Native Hawaiian or Other Pacific Islander men	0.5	0.5	0.4	0.2	0.2	0.3	0.4	0.6	0.3	0.3	0.3
	Unspecified women	0.5	0.7	0.5	0.4	0.3	0.4	0.5	0.4	0.7	0.7	0.7
	American Indian or Alaska Native men	0.3	0.4	0.1	0.4	0.3	0.3	0.2	0.3	0.3	0.2	0.2
	Native Hawaiian or Other Pacific Islander women	0.2	0.1	0.1	0.2	0.3	0.1	0.2	0.3	0.2	0.2	0.3
	American Indian or Alaska Native women	0.1	0.1	0.1	0.1	0.2	0.1	_	0.1	_	0.2	
Most Economically Disadvantaged	White men	50.0	50.7	49.6	47.3	44.7	45.0	44.0	43.3	40.5	41.3	41.1
	Black or African American men	10.5	10.7	12.0	12.7	11.5	12.9	12.0	13.3	14.6	12.8	12.8
	White Women	9.2	11.6	10.3	11.9	9.9	11.7	11.4	11.7	13.3	10.1	10.8
	Black or African American women	9.0	7.3	7.6	7.0	8.6	6.8	8.1	8.1	6.7	8.1	7.6
	Hispanic or Latino men	7.3	6.6	8.7	8.4	9.0	9.1	9.8	8.4	10.3	10.8	11.4
	Asian men	3.8	2.9	3.1	3.1	4.5	3.0	3.5	3.5	4.3	3.6	3.6
	Hispanic or Latino women	3.4	3.1	2.6	3.7	4.9	4.3	5.2	4.3	4.6	5.4	5.6
	Asian women	1.9	1.3	0.9	0.7	1.4	1.6	1.7	1.4	0.8	1.1	1.4

 Multiracial men	1.4	1.2	1.6	1.2	1.2	1.7	1.3	1.4	1.9	1.8	1.4
 Unspecified men	1.4	1.8	1.1	1.1	1.5	1.5	1.2	1.6	1.3	1.8	1.8
 Multiracial women	0.6	0.4	0.8	0.8	0.8	0.9	0.2	1.0	0.7	1.0	0.7
 Native Hawaiian or Other Pacific Islander men	0.6	0.5	0.4	0.7	0.4	0.3	0.2	0.6	0.2	0.3	0.6
American Indian or Alaska Native men	0.4	0.5	0.5	0.5	0.5	0.4	0.6	0.5	0.3	0.8	0.3
 Unspecified women	0.3	0.9	0.6	0.7	0.9	0.6	0.6	0.7	0.6	0.8	0.6
American Indian or Alaska Native women	0.2	0.1	0.1	0.1	0.1	0.1	—	0.2	—	0.2	0.2
 Native Hawaiian or Other Pacific Islander women	0.2	0.3	0.3	0.2	0.2	_	0.1	0.2	_	0.1	0.2

Source: GAO analysis of military department and American Community Survey data. | GAO-23-105857

Socioeconomic Analysis of ROTC-Commissioned Officers by Intersection of Race and Ethnicity and Gender and by Military Department for Academic Years 2011–2021

For academic year 2011 through academic year 2021, across all three military departments, the percentage of White men from the most economically advantaged counties was greater than the corresponding percentage from the most economically disadvantaged every year between academic years 2011 through 2021. Furthermore, from both the most economically advantaged and disadvantaged counties, the percentage of White men decreased as a percentage of each population between 2011 and 2021 across all three military departments. In contrast, the only intersectional group to increase as a percentage of each of the three military departments' populations was Hispanic or Latino men (see table 10).

Table 10: Change in Percentage of Officers Commissioned through Reserve Officers' Training Corps (ROTC) Programs in Most Economically Advantaged and Disadvantaged Counties across Military Departments, by Intersection of Race and Ethnicity and Gender, Academic Years 2011 and 2021

		Most Economically Ac	Most Economically Advantaged		dvantaged
		2011	2021	2011	2021
Army	American Indian or Alaska Native men	0.3	0.3	0.3	0.5
	American Indian or Alaska Native women	_	0.1	0.3	0.2
	Asian men	4.0	7.3	2.8	4.0
	Asian women	1.2	2.0	1.5	1.1
	Black or African American men	4.0	4.8	12.3	15.4
	Black or African American women	2.4	2.6	10.3	8.7
	Hispanic or Latino men	3.9	5.1	8.1	11.5
	Hispanic or Latino women	1.2	2.5	3.9	6.0
	Multiracial men	1.1	1.2	1.7	1.0

	Multiracial women	0.4	0.3	0.4	0.3
	Native Hawaiian or Other Pacific Islander men	0.8	0.4	0.8	0.8
	Native Hawaiian or Other Pacific Islander women	0.3	0.2	0.3	0.2
	Unspecified men	1.0	0.9	1.0	1.3
	Unspecified women	0.4	0.2	0.3	0.2
	White men	64.8	56.2	49.1	39.3
	White women	14.3	16.0	7.0	9.5
Navy	American Indian or Alaska Native men	—	0.2	—	_
	American Indian or Alaska Native women	—	—	—	_
	Asian men	2.4	5.1	8.9	3.8
	Asian women	1.2	1.4	—	3.8
	Black or African American men	0.4	1.2	3.6	3.8
	Black or African American women	1.6	1.2	—	2.5
	Hispanic or Latino men	3.2	3.5	5.4	12.7
	Hispanic or Latino women	1.6	1.6	1.8	2.5
	Multiracial men	2.4	3.0	—	
	Multiracial women	1.6	0.9	1.8	_
	Native Hawaiian or Other Pacific Islander men	—	—	—	
	Native Hawaiian or Other Pacific Islander women	—	0.2	_	_
	Unspecified men	4.0	3.0	1.8	7.6
	Unspecified women	_	0.9	_	1.3
	White men	66.3	61.0	55.4	46.8
	White women	15.5	16.6	21.4	15.2
Air Force	American Indian or Alaska Native men	0.4	—	0.8	_
	American Indian or Alaska Native women	0.4	_	_	
	Asian men	5.7	5.2	5.7	1.9
	Asian women	2.0	2.1	3.7	1.4
	Black or African American men	1.6	2.4	6.1	5.7
	Black or African American women	1.6	1.4	6.9	5.2
	Hispanic or Latino men	2.6	5.9	4.9	10.4
	Hispanic or Latino women	1.4	1.7	2.0	4.7
	Multiracial men	1.2	2.3	0.8	3.3
	Multiracial women	0.8	1.7	0.8	2.4
	Native Hawaiian or Other Pacific Islander men	0.2	0.3	0.4	_
	Native Hawaiian or Other Pacific Islander women	0.2	0.6	_	_
	Unspecified men	3.0	2.7	2.4	1.9
	Unspecified women	0.8	1.6	0.4	1.9

White men	61.6	56.4	51.4	46.7
White women	16.6	15.7	13.5	14.6

Source: GAO analysis of military department and American Community Survey data. | GAO-23-105857

County Demographic Data and Confidence Intervals Our analysis includes discussion of the racial and ethnic makeup of counties where schools with ROTC were located. Table 11 shows the percentage of schools in each percentile group for counties' relative population of each racial group (for example, the percentage of schools with ROTC that were located in counties below the 25th percentile of all counties for the percentage of their population that is White).

Table 11: Locations of Schools with Reserve Officers' Training Corps (ROTC) Programs by Percentile of Racial Groups in the County

		White	Black or African American	Asian	Hispanic or Latino
Below 25th percentile	Percent of schools	49.6	4.5	25.6	9.0
	Percent of schools (upper bound)	49.8	4.8	27.2	10.1
	Percent of schools (lower bound)	49.5	4.2	24.0	7.9
25th to 75th percentile	Percent of schools	45.2	53.1	51.0	47.2
	Percent of schools (upper bound)	45.4	53.5	52.6	47.7
	Percent of schools (lower bound)	44.9	52.7	49.4	46.7
Above 75th percentile	Percent of schools	5.2	42.4	23.4	43.8
	Percent of schools (upper bound)	5.4	42.7	24.5	44.9
	Percent of schools (lower bound)	5.0	42.1	22.3	42.8

Source: GAO analysis of military department data and American Community and Department of Education data. | GAO-23-105857

Note: Unless otherwise noted, the confidence interval around these estimates does not exceed 4 percentage points.

States and Territories with Highest and Lowest Number of Schools with ROTC, by Military Department

 Table 12: U.S. States and Territories with Highest and Lowest Number of Schools with Reserve Officers' Training Corps

 (ROTC) Programs, by Military Department

Army		Navy		Air Force	
State/territory	Number of schools with a unit	State/territory	Number of schools with a unit	State/territory	Number of schools with a unit
New York	105	New York	12	California	148
Pennsylvania	87	California	11	New York	81

California	67	Florida, Virginia	10	Texas	63
Texas	54 Texas, Louisiana, Massachusetts		9	Ohio, Pennsylvania	52
Massachusetts	47				
	_	_	_	_	_
American Samoa, Guam, Virgin Islands, Wyoming	1	Connecticut, Hawaii, Iowa, Mississippi, Nebraska, Oklahoma, Oregon, Rhode Island, Vermont	1	Montana, Wyoming	1
Micronesia, Marshall Islands, Northern Mariana Islands, Palau, U.S. Minor	Federated States of0Alaska, AmMicronesia, MarshallDelaware, IIslands, Northern MarianaMicronesia, Micronesia, Microesia, Micronesia, Micronesia, Micronesia, M		0	American Samoa, Federated States of Micronesia, Guam, Marshall Islands, Northern Mariana Islands, Palau, Virgin Islands, U.S. Minor Outlying Islands	0

Source: GAO analysis of military department data | GAO-23-105857

Note: The "---" divides states and territories with the highest and lowest number of schools with at least one or no ROTC units of any type.

Percentage of Students in Each State and Territory Who Attend a School with ROTC

Table 13 lists each state and territory along with the average number and percentage of undergraduate students who attended a school with an ROTC host unit, an ROTC cross-town unit, or no ROTC unit from academic year 2011 through academic year 2021.

 Table 13: Average Percentage of Undergraduate Students in U.S. States and Territories who Attended a School with Reserve Officers' Training Corps (ROTC) Programs, Academic Years 2011–2021

	No F	No ROTC unit		C host unit	ROTC cross-town unit		
	Number of students	Percentage of students in State	Number of students	Percentage of students in State	Number of students	Percentage of students in State	
AK	3,692	14.1	22,098	84.5	361	1.4	
AL	98,575	38.0	121,624	46.9	39,060	15.0	
AR	61,222	41.9	41,647	28.5	43,255	29.6	
AS	0	0.0	0	0.0	1,306	100.0	
AZ	191,345	32.8	100,693	17.3	290,590	49.9	
CA	584,567	24.2	299,679	12.4	1,532,394	63.4	
CO	98,886	33.4	59,671	20.1	137,694	46.5	
СТ	77,613	48.5	22,245	13.9	60,231	37.6	
DC	8,216	17.4	23,148	49.0	15,854	33.6	
DE	14,037	26.5	18,081	34.1	20,908	39.4	
FL	330,881	33.6	236,686	24.0	417,204	42.4	

FM ^a	2,288	100.0	0	0.0	0	0.0
GA	243,393	49.6	134,901	27.5	112,418	22.9
GU	2,288	40.1	3,417	59.9	0	0.0
HI	26,743	44.7	13,183	22.1	19,854	33.2
IA	116,637	50.0	56,562	24.3	59,963	25.7
ID	25,952	25.5	28,498	28.0	47,346	46.5
IL	329,159	52.5	140,676	22.4	157,707	25.1
IN	237,389	52.7	116,279	25.8	96,849	21.5
KS	92,891	50.9	41,652	22.8	47,912	26.3
KY	78,925	34.7	76,031	33.4	72,761	32.0
LA	69,593	32.0	60,520	27.9	87,084	40.1
MA	95,640	27.7	72,225	20.9	177,413	51.4
MD	57,562	19.8	59,507	20.5	173,775	59.8
ME	35,329	58.1	9,958	16.4	15,484	25.5
MH ^a	1,031	100.0	0	0.0	0	0.0
MI	253,028	48.7	127,294	24.5	138,828	26.7
MN	137,154	44.3	61,787	19.9	111,010	35.8
МО	163,245	46.9	88,699	25.5	95,916	27.6
MP ^a	1,065	100.0	0	0.0	0	0.0
MS	35,258	23.4	55,314	36.7	60,146	39.9
MT	16,593	35.9	23,437	50.7	6,224	13.5
NC	215,452	43.9	135,876	27.7	139,187	28.4
ND	22,180	49.2	21,823	48.5	1,038	2.3
NE	36,375	32.9	34,680	31.3	39,588	35.8
NH	20,113	20.2	12,335	12.4	67,367	67.5
NJ	122,818	34.7	49,671	14.0	181,733	51.3
NM	59,395	48.0	32,859	26.5	31,564	25.5
NV	29,500	27.4	39,591	36.7	38,775	36.0
NY	213,992	21.3	116,911	11.6	673,224	67.1
ОН	227,003	38.8	203,500	34.7	155,264	26.5
OK	54,345	30.2	58,099	32.3	67,287	37.4
OR	40,087	19.8	43,541	21.5	118,524	58.6
PA	194,811	32.9	171,598	29.0	226,076	38.2
PR	62,930	30.6	24,073	11.7	118,387	57.6
PW ^a	601	100.0	0	0.0	0	0.0
RI	4,704	6.8	17,922	26.0	46,276	67.2
SC	76,090	34.1	56,016	25.1	91,197	40.8
SD	16,414	35.0	20,094	42.8	10,444	22.2

TN	103,155	36.2	109,978	38.6	71,820	25.2
ТХ	446,498	32.4	399,000	29.0	531,160	38.6
UT	89,079	33.6	100,445	37.8	75,959	28.6
VA	153,048	32.7	124,492	26.6	190,958	40.8
USVI	0	0.0	0	0.0	1,949	100.0
VT	6,970	19.1	13,572	37.1	16,008	43.8
WA	122,283	39.5	83,266	26.9	104,255	33.7
WI	120,415	38.4	67,233	21.5	125,676	40.1
WV	87,093	66.5	33,726	25.7	10,213	7.8
WY	22,081	69.7	9,598	30.3	0	0.0

Source: GAO analysis of military department data and American Community and Department of Education data. | GAO-23-105857

^aTerritories with no ROTC units, where 100 percent of students did not attend a school with ROTC.

Appendix III: Comments from the Department of Defense

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE 1500 DEFENSE PENTAGON WASHINGTON, D.C. 20301-1500 AUG 0 3 2023 MANPOWER AND RESERVE AFFAIRS Ms. Brenda S. Farrell Director, Acquisition and Sourcing Management U.S. Government Accountability Office 441 G Street, NW Washington DC 20548 Dear Ms. Farrell, This is the Department of Defense (DoD) response to the Government Accountability Office (GAO) Draft Report GAO-23-105587, "Senior Reserve Officers' Training Corps: Actions Needed to Better Monitor Diversity Progress," dated June 7, 2023 (GAO Code 105857). DoD concurs with the GAO's recommendations described within this report. Please see the attached formal comments and implementation assessments for each of the report's four recommendations. My point of contact is Lt Col William E. Parker who may be reached at william.e.parker102.mil@mail.mil or (703) 695-5529. JULIE Maron Grier Martin Performing the Duties of the Assistant Secretary of Defense for Manpower and Reserve Affairs Attachment: As stated





Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact:	Brenda S. Farrell, (202) 512-3604 or farrellb@gao.gov.
Staff Acknowledgments:	In addition to the contact named above, Kimberly Seay (Assistant Director), Paul Seely (Analyst-in-Charge), Nicole Ashby, Elise Beisecker, Peter Casey, Blake Faucher, Chad Hinsch, Signe Janoska-Bedi, David Jones, Mae Jones, Anjalique Lawrence, Robert Letzler, Ricardo Marquez, Jeffrey G. Miller, John Mingus, Lillian Ofili, and Jack Wang made key contributions to this report.

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