



K-12 Education: Prevention and Response to Adult Sexual Misconduct in Junior Reserve Officers' Training Corps Programs

GAO-25-107670

Q&A

Report to Congressional Requesters

August 28, 2025

Why This Matters

The Junior Reserve Officers' Training Corps (JROTC) is a Department of Defense (DOD) program in over 3,400 U.S. public high schools and is designed to educate students on leadership and citizenship. In 2022, allegations that JROTC instructors had inappropriately touched, spoken to, or sexually assaulted students raised safety questions about the program. In response, Congress and DOD took steps to address these questions. For example, the National Defense Authorization Act (NDAA) for fiscal year 2024 mandated that DOD require schools to report allegations of adult sexual misconduct by instructors to the appropriate military service. In 2023, DOD entered into an agreement to share information about allegations of adult sexual misconduct in schools that host JROTC programs (host schools) with the Department of Education.

We were asked to examine how schools implement JROTC and how Education coordinates with DOD regarding adult sexual misconduct in the program. Sexual misconduct can be a type of sex discrimination. For the purposes of this report, we define adult sexual misconduct as an adult sexually assaulting, sexually harassing, or attempting to develop an intimate or sexual relationship with a student.

This report provides findings from our nationally generalizable survey of school administrators on how schools oversee JROTC, how they prevent and respond to allegations of adult sexual misconduct, and whether administrators were aware of any adult sexual misconduct allegations against JROTC instructors in their schools in the prior 5 years. It also describes how DOD and Education share information to address sex discrimination in this program. This is the first of two reports on adult sexual misconduct in JROTC.

Key Takeaways

DOD sets policies and guidance for JROTC. The military services' and school districts' responsibilities are laid out in a Memorandum of Agreement (MOA). Prior to fall 2024, each military service had its own agreement, but the Fiscal Year 2024 National Defense Authorization Act required DOD to develop a standardized one.

According to responses to our nationally generalizable survey in winter 2024–2025,

- An estimated range of 2 to 7 percent of administrators of public high schools with JROTC programs had at least one JROTC instructor who was the subject of an adult sexual misconduct allegation in the prior 5 years.
- An estimated 89 percent of JROTC host schools have mandatory training for staff on adult sexual misconduct, covering topics such as recognizing and

reporting such misconduct. An estimated 45 percent of host schools require this type of training for students.

- An estimated 48 percent of school administrators drop in to observe JROTC classes at least twice a month, and 30 percent do so monthly. In addition, an estimated 18 percent of administrators drop in to observe JROTC activities outside of school hours frequently and 48 percent do so occasionally.
- An estimated 49 percent of JROTC host schools require the presence of two adults for activities outside of regular school hours and 43 percent require one male and one female adult present for coed activities. Because only an estimated 11 percent of host schools have both a male and female instructor, schools may face challenges in having both male and female adults present.

In September 2023, Education and DOD signed a Memorandum of Understanding (MOU) to improve information sharing and coordination to address discrimination, including sex discrimination, in JROTC programs. Under certain circumstances sex discrimination may include sexual misconduct.

What are some characteristics of JROTC programs?

JROTC programs enrolled nearly 500,000 high school students in fiscal year 2024. Students enroll in JROTC as part of their regular course load and take classes in leadership, ethics, civics, history, health and wellness, and military service-specific classes such as Aerospace Science or Seamanship and Navigation. Students who choose to participate in JROTC are not required to serve in the military, and military recruitment is not a stated objective of the program.

JROTC students also participate in extracurricular activities such as color guard, marksmanship, and field trips to military installations. Our survey found that an estimated 65 percent of JROTC programs hold on-campus activities outside of regular school hours at least weekly.¹ In addition, an estimated 50 percent of host schools have overnight trips at least once a year, and an estimated 79 percent have other off-campus JROTC activities at least twice a year.

Students generally participate in JROTC at their assigned school but sometimes participate at a nearby school—for example, when one school serves as a hub for certain elective programs. Our survey estimated that 23 percent of host schools enroll students from other schools in the same district in their JROTC programs, and 6 percent enroll students from nearby districts.

DOD provided about \$439 million in total funding for JROTC in fiscal year 2024.² Each military service administers and funds its own JROTC program jointly with participating high schools—98 percent of which are public schools. Schools can only have a JROTC program affiliated with one military service. In general, JROTC instructors are former or current officers or noncommissioned officers who are certified by their respective military service and employed by schools.³

How prevalent are known adult sexual misconduct allegations against JROTC instructors?

Based on responses to our nationally generalizable survey of school administrators, we estimate that 2 to 7 percent of public high schools with JROTC programs had at least one JROTC instructor who was the subject of an adult sexual misconduct allegation in the prior 5 years. Of the schools with at least one allegation, an estimated 6 percent had at least one substantiated allegation. Schools are to address allegations of instructor misconduct in accordance with their school district policies. They are also to notify the military service of investigations into alleged JROTC instructor adult sexual misconduct and discipline against instructors.

An estimated 6 percent of school administrators were not sure if their school had received allegations of adult sexual misconduct against a JROTC instructor in the prior 5 years because they had been in their position for less than that timeframe.

What is adult sexual misconduct?

For the purposes of this report, we define adult sexual misconduct as an adult sexually assaulting, sexually harassing, or attempting to develop an intimate or sexual relationship with a student. This covers a range of behaviors, including making sexual invitations; sending text, email, or social media messages of a sexual nature; showing or producing sexually explicit images; or engaging in sexual touching, kissing, hair stroking, oral sex, or any type of penetrative intercourse.

Source: GAO analysis of Department of Education documents and a *Journal of Child Sexual Abuse* article. | GAO-25-107670

Note: The article is Sandy K. Wurtele, Ben Mathews, and Maureen C. Kenny, "Keeping Students out of Harm's Way: Reducing Risks of Educator Sexual Misconduct," *Journal of Child Sexual Abuse*, vol. 28, no. 2 (2019): 160–186.

What do federal entities and schools do to implement JROTC and address any adult sexual misconduct?

DOD, the military services, host schools, and Education are all responsible for implementing JROTC and addressing any adult sexual misconduct in the program (see fig. 1). For example, DOD sets policies and guidance for JROTC. The military services' and school districts' responsibilities are laid out in a Memorandum of Agreement (MOA). Prior to fall 2024, each military service had its own agreement, but the Fiscal Year 2024 National Defense Authorization Act required DOD to develop a standardized one.

The military services began implementing the standardized agreement in fall 2024 and plan to finish implementing it by the end of school year 2025–2026 by signing an MOA with each participating school district.⁴ These agreements require schools to address instructor violations of the MOA, in accordance with district policies. They also require the military services to take action regarding instructor certification, based on the violation or adverse investigation findings, among other things.

Education addresses allegations of sex discrimination involving adult sexual misconduct in JROTC when its Office for Civil Rights receives a complaint, according to Education officials.

Figure 1: Selected Roles and Responsibilities for the Junior Reserve Officers' Training Corps (JROTC)

 Department of Defense	 Military Services Army, Marine Corps, Navy, Air Force and Space Force ^a	 Schools	 Department of Education
Implementing JROTC			
<ul style="list-style-type: none"> Establish policies and guidance for the military services' JROTC programs 	<ul style="list-style-type: none"> Conduct initial background check and certify instructors to teach JROTC classes ▲ Develop curriculum for JROTC classes Pay schools for half of JROTC instructors' salaries Provide textbooks, education materials, students' uniforms and travel, and other resources as appropriate Evaluate the administration and effectiveness of schools' JROTC programs annually ▲ 	<ul style="list-style-type: none"> Hire JROTC instructors as school employees Conduct any background checks that the state or school district requires ▲ Cover portion of the salary not reimbursed by the service Provide classrooms, facilities, and administrative support for JROTC ▲ Evaluate JROTC instructors' teaching annually ▲ 	<ul style="list-style-type: none"> No role in implementing JROTC
Addressing adult sexual misconduct			
<ul style="list-style-type: none"> Establish policies for JROTC instructor conduct and policies for training on Title IX compliance Collect data on adult sexual misconduct incidents in JROTC programs 	<ul style="list-style-type: none"> Provide anti-harassment and abuse training to JROTC instructors ▲ Take action regarding instructor certification based on a violation of the MOA or adverse investigation findings ▲ 	<ul style="list-style-type: none"> Provide anti-harassment and abuse training to JROTC instructors ▲ Address instructor actions that violate the MOA in accordance with their school districts' policies ▲ Notify military service of investigations into alleged JROTC instructor adult sexual misconduct and discipline against instructors ▲ 	<ul style="list-style-type: none"> Investigate, as appropriate, Title IX complaints its Office for Civil Rights receives alleging discrimination against a school or district^b

▲ = Responsibility established in the memorandum of agreement (MOA) that the military services sign with each participating school's district. Prior to fall 2024, each military service had its own MOA, but the Fiscal Year 2024 National Defense Authorization Act required the Department of Defense to develop a standardized MOA. The military services began implementing the standardized MOA in fall 2024 and plan to finish implementing it by the end of school year 2025–2026.

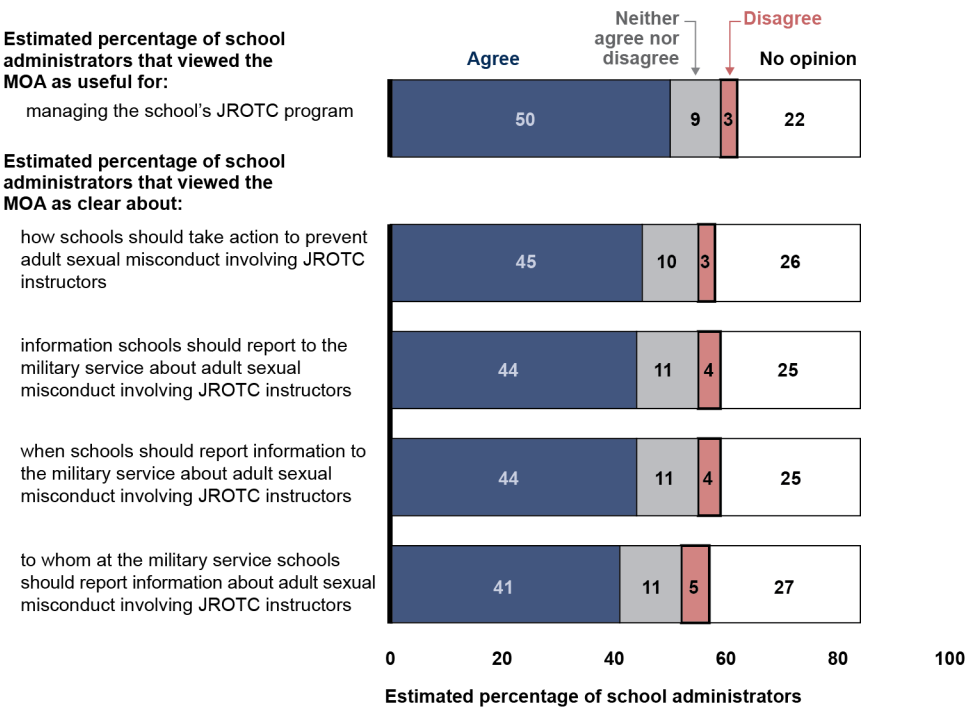
Source: GAO analysis of documents from the Department of Defense (DOD) and Department of Education. GAO (icons), DOD (logo); Education (logo). | GAO-25-107670

^aThe Air Force administers the Space Force JROTC program. The Coast Guard also administers a JROTC program under the Department of Homeland Security. This report does not examine Coast Guard JROTC.

^bTitle IX of the Education Amendments of 1972 generally prohibits sex discrimination—which under certain circumstances includes adult sexual misconduct—in an education program or activity that receives federal funding, such as public schools.

According to responses to our nationally generalizable survey, we estimate that about half of school administrators viewed the MOA as being useful for managing the school's JROTC program, and about one-quarter said they had no opinion about the MOA's usefulness (see fig. 2). School administrators' familiarity with the MOA may vary because school district officials—not school administrators—sign them. The extent to which district officials involve school administrators in reviewing the MOA varies by district, according to school administrators we interviewed.

Figure 2: School Administrators’ Views on the Memorandum of Agreement (MOA) for Implementing the Junior Reserve Officers’ Training Corps (JROTC) Program with the Military Services, Winter 2024-2025



Source: GAO survey of public school administrators who oversee JROTC programs. | GAO-25-107670

Note: The margin of error for these estimates is within +/- 10 percentage points. Percentages do not sum to 100 because not all survey respondents answered each question. Prior to fall 2024, each military service had its own MOA. The military services began implementing a standardized MOA in fall 2024 and plan to finish implementing it by the end of school year 2025–2026. We administered our survey in December 2024, so school administrators may have responded about the military service-specific MOAs or the new, standardized MOA.

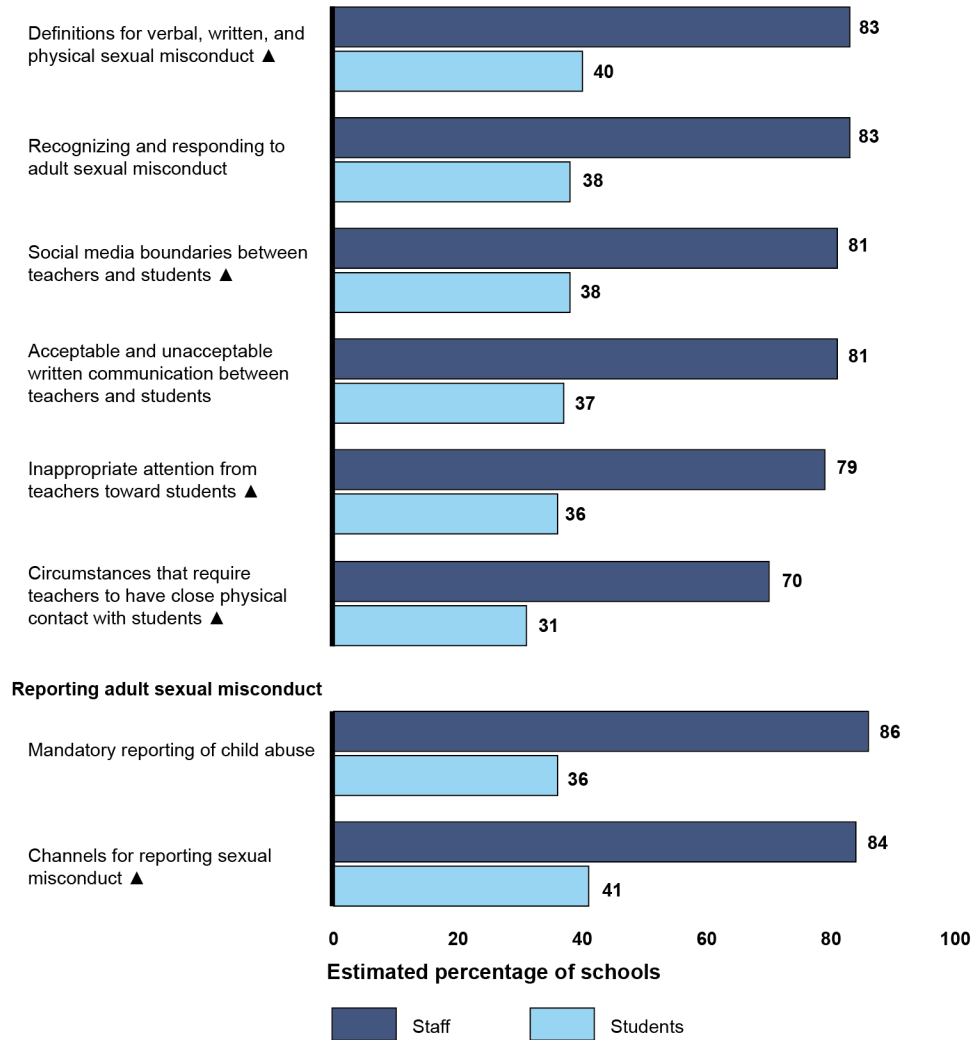
What do school administrators say they do to help prevent adult sexual misconduct in JROTC?

To help prevent adult sexual misconduct in JROTC, schools commonly choose to require training for staff and students, have administrators observe JROTC classes and activities, and use code of conduct policies for activities outside of school hours, according to responses to our nationally generalizable survey.⁵

Mandatory training. According to our survey, an estimated 89 percent of schools have mandatory training for all school staff—including JROTC instructors—on topics such as recognizing and reporting adult sexual misconduct. An estimated 45 percent require this type of training for students. These trainings cover a range of topics, including those that Education suggests schools include in their adult sexual misconduct policies, such as definitions of and channels for reporting adult sexual misconduct (see fig. 3).⁶

Figure 3: Estimated Percentage of Schools Providing Mandatory Adult Sexual Misconduct Training to Staff or Students, by Topic, Winter 2024–2025

Recognizing adult sexual misconduct



▲ = Practices that Department of Education guidance describes as necessary for all staff in their adult sexual misconduct policies.

Source: GAO survey of public school administrators who oversee Junior Reserve Officers' Training Corps (JROTC) programs. | GAO-25-107670

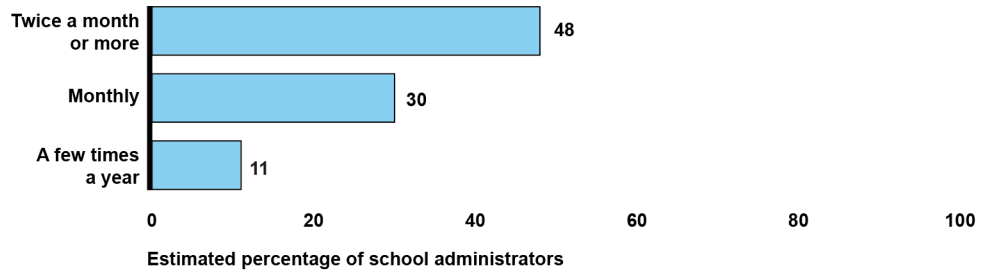
Note: The margin of error for these estimates is within +/- 10 percentage points. Education guidance further notes that when training is age-appropriate and relevant, students can play a critical role in prevention by observing the appropriate boundaries they are taught, reporting inappropriate behavior, and reinforcing awareness in their peers.

An estimated 70 percent of schools that provide this training to staff deliver it in a self-paced format (e.g., online training). Of the schools that provide this training to students, an estimated 65 percent deliver live training.

Administrator observation. School administrators may observe JROTC classes and activities through drop-in visits (i.e., informal, unannounced visits) and performance evaluations. According to school administrators and military officials we interviewed, drop-in visits can help administrators observe school classes and activities, instructor conduct, and student-instructor relationship boundaries. These visits can make administrators aware of and provide an opportunity to address inappropriate instructor behavior, including behaviors that may escalate to adult sexual misconduct.

According to our survey, an estimated 48 percent of school administrators drop in on JROTC classes twice a month or more, and 30 percent do so monthly (see fig. 4).

Figure 4: Estimated Frequencies at Which School Administrators Drop in on Junior Reserve Officers' Training Corps (JROTC) Classes, Winter 2024–2025

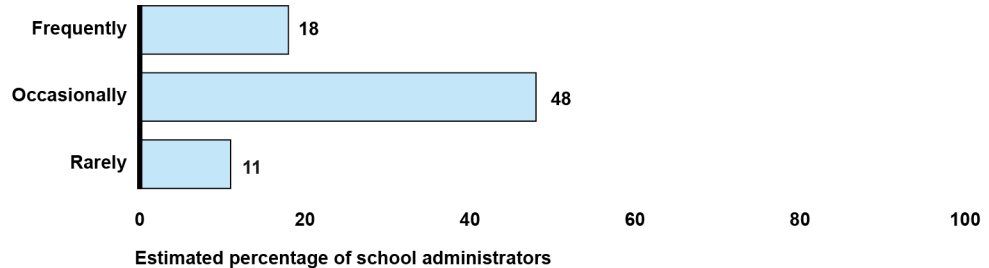


Source: GAO survey of public school administrators who oversee JROTC programs. | GAO-25-107670

Note: The margin of error for these estimates is within +/- 10 percentage points. Percentages do not sum to 100 because not all respondents answered all questions, and not all survey response options are shown.

For on-campus JROTC activities that occur outside of school hours, an estimated 18 percent of school administrators drop-in frequently and 48 percent do so occasionally (see fig.5).

Figure 5: Estimated Frequencies at Which School Administrators Drop in on Junior Reserve Officers' Training Corps (JROTC) Activities Occurring Outside of Regular School Hours, Winter 2024–2025



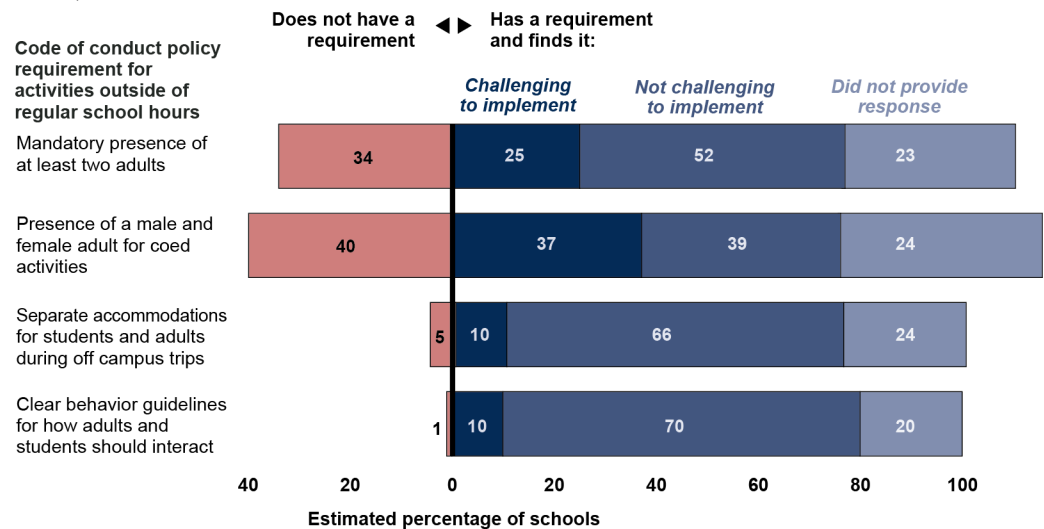
Source: GAO survey of public school administrators who oversee JROTC programs. | GAO-25-107670

Note: The margin of error for these estimates is within +/- 10 percentage points. Percentages do not sum to 100 because not all respondents answered all questions, and not all survey response options are shown.

School administrators may also observe JROTC instructors when they formally evaluate instructor performance. We estimate 81 percent of administrators use the same performance evaluation criteria for JROTC instructors that they use for all other teachers in the school.

Code of conduct policies. An estimated 82 percent of school administrators work in a school that has a code of conduct policy for adults who interact with students during activities outside of regular school hours. Schools differed in the content these policies cover (see fig 6). These policies generally apply schoolwide and are not specific to JROTC.

Figure 6: Estimated Percentage of Junior Reserve Training Officers' (JROTC) Host Schools with Code of Conduct Policies for Adults Who Interact with Students During Activities Outside of Regular School Hours, Winter 2024-2025



Source: GAO survey of public school administrators who oversee JROTC programs. | GAO-25-107670

Note: The margin of error for these estimates is within +/- 10 percentage points.

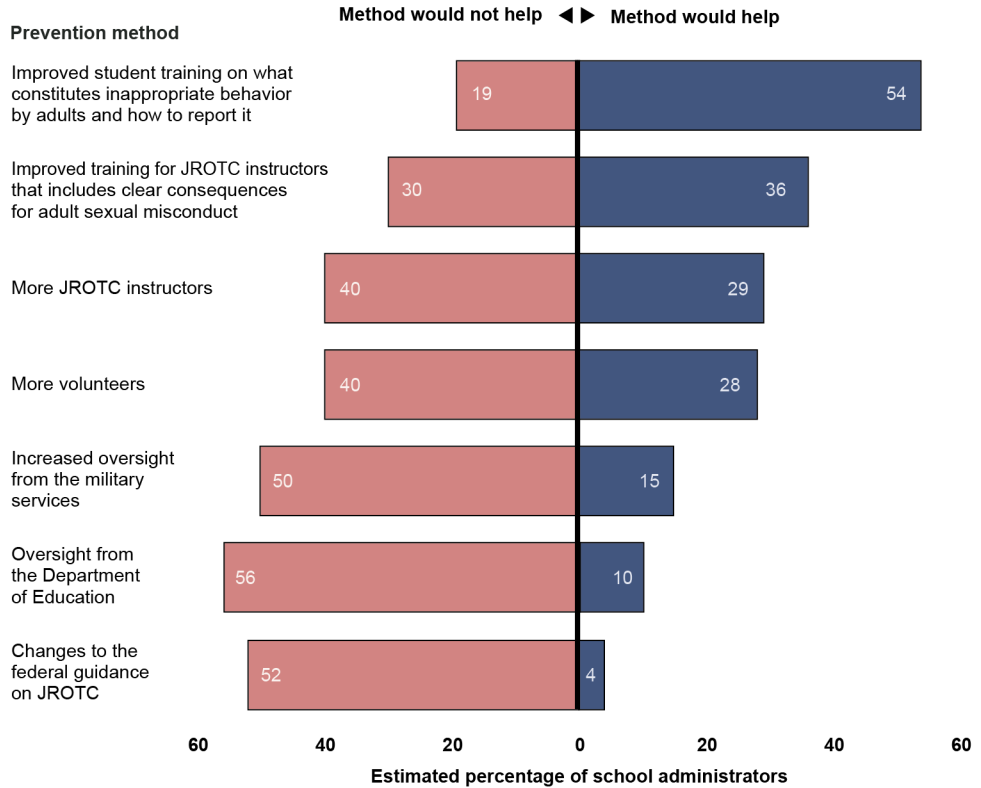
An estimated 49 percent of schools' codes of conduct policies require the presence of two adults for activities outside of regular school hours. In addition, an estimated 43 percent of school policies require the presence of a male and female adult for coed activities outside of regular school hours. School administrators choosing to impose these two requirements often found them more challenging to implement than other requirements, such as establishing clear behavior guidelines or having separate sleeping accommodations for students and adults during off-campus overnight trips.

According to DOD policy, JROTC programs should have at least two instructors—a senior instructor and a junior instructor. However, recruitment and hiring challenges can contribute to JROTC programs staffed by only one instructor, according to DOD officials. Schools may also face challenges in having two adults present during JROTC activities outside of regular school hours if they have only one JROTC instructor, which according to our survey, applied to an estimated 14 percent of schools as of winter 2024–2025.⁷ In addition, schools may face challenges in having both male and female adults present during coed JROTC activities outside of regular school hours because relatively few JROTC programs (an estimated 11 percent) have both a male and female instructor.

What do school administrators say would further help protect students from adult sexual misconduct in JROTC?

According to responses to our generalizable survey, more than half of school administrators (an estimated 54 percent) believe that improved training to help students understand what inappropriate adult behavior looks like could help protect students from adult sexual misconduct in JROTC (see fig. 7). Among school administrators who already require such training for students, an estimated 57 percent believe that improving this kind of training could help. We estimate that smaller proportions of administrators believe that other interventions, such as more oversight from the military services or Education, would help.

Figure 7: Estimated Percentage of School Administrators Who Believe Various Methods Would Help Increase Students' Protection Against Adult Sexual Misconduct in their School's Junior Reserve Officers' Training Corps (JROTC) program, Winter 2024–2025



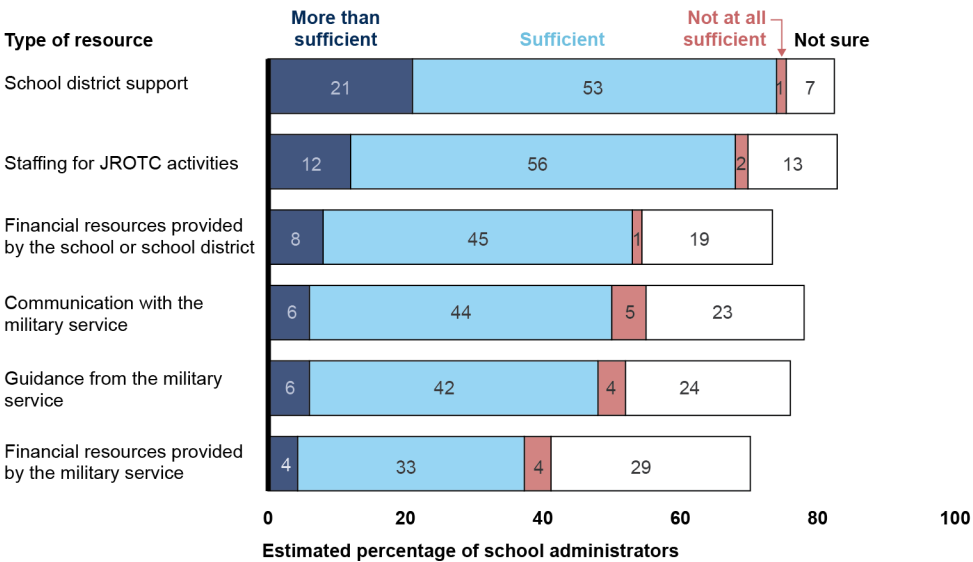
Source: GAO survey of public school administrators who oversee JROTC programs. | GAO-25-107670

Note: The margin of error for these estimates is within +/- 10 percentage points. Percentages do not sum to 100 because not all survey respondents answered each question.

To what extent do school administrators receive guidance from the military services on preventing adult sexual misconduct in JROTC?

According to responses to our survey, less than a quarter of school administrators received guidance—such as a handbook or training—on preventing adult sexual misconduct in JROTC (an estimated 20 percent) or reporting allegations (an estimated 18 percent) from the military services in the previous 2 years. During this timeframe, an estimated 34 percent of Air Force JROTC programs received guidance on these topics, which we estimate is higher than the other services.⁸ We estimate that about half of school administrators believe that guidance from and communication with the military services had been sufficient for preventing adult sexual misconduct in JROTC (see fig. 8).

Figure 8: School Administrators’ Views of the Sufficiency of Selected Resources for Preventing Adult Sexual Misconduct in the Junior Reserve Officers’ Training Corps (JROTC), Winter 2024–2025



Source: GAO survey of public school administrators who oversee JROTC programs. | GAO-25-107670

Note: The margin of error for these estimates is within +/- 10 percentage points. Percentages do not sum to 100 because not all survey respondents answered each question.

How would schools respond if they received an adult sexual misconduct allegation involving a JROTC instructor?

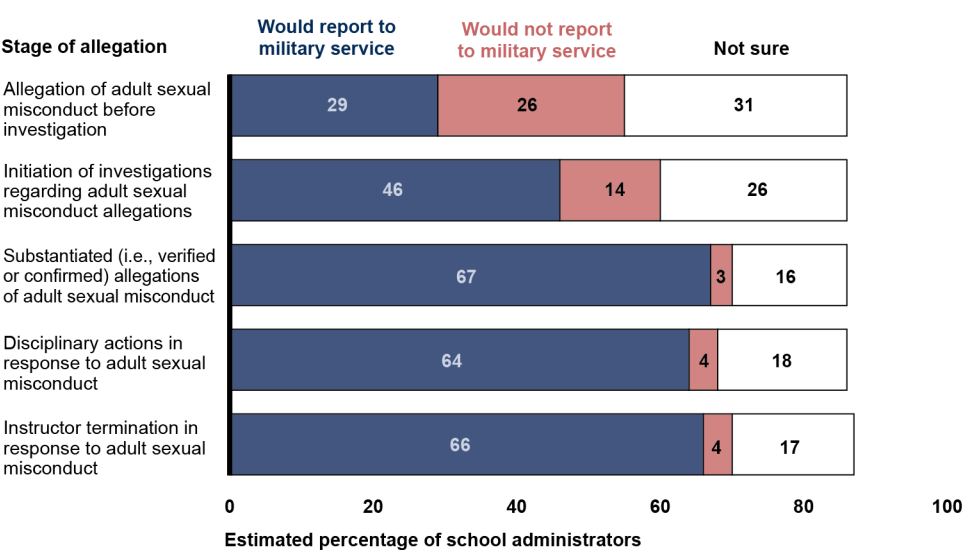
According to responses to our survey, an estimated 82 percent of school administrators would contact law enforcement if they received an allegation of adult sexual misconduct against a JROTC instructor.⁹ In addition, we estimated the percent of school administrators who would contact the following entity:

- a school district official other than the Title IX coordinator (78 percent),
- a child welfare agency (75 percent),
- a school district Title IX coordinator (76 percent), and
- the military service related to the school’s JROTC program (51 percent). Of this group, an estimated 55 percent were not sure or did not know whom to contact.

Before the standardized MOA was introduced, all military service-specific agreements except the Army’s required JROTC host schools or districts to report instructor misconduct to the service.¹⁰ However, the information each agreement required school districts to report and the reporting time frames varied. According to service officials, because the agreement will not be fully implemented until the end of school year 2025–2026, not all school districts have signed it yet.

According to our survey, during winter 2024-2025, schools varied as to when they would report allegations of and investigations into adult sexual misconduct in JROTC programs. For example, an estimated 46 percent of school administrators would report an allegation when an investigation was initiated compared to an estimated 67 percent who would report when an investigation substantiated an allegation (see fig. 9).

Figure 9: Estimated Percentage of School Administrators Who Would Report Certain Incidents Involving a Junior Reserve Officers' Training Corps (JROTC) Instructor to the Military Service, Winter 2024–2025



Source: GAO survey of public school administrators who oversee JROTC programs. | GAO-25-107670

Note: The margin of error for these estimates is within +/- 10 percentage points. Percentages do not sum to 100 because not all survey respondents answered each question.

DOD’s new MOA, which it plans to implement by the end of school year 2025–2026, will require all school districts to contact the military service to report matters related to JROTC instructors. Specifically, districts must report any disciplinary or administrative actions against a JROTC instructor, initiations of investigations related to instructor misconduct, or changes in the employment status of a JROTC instructor to the military service within 1 business day.

What resources does Education provide to help prevent adult sexual misconduct in JROTC?

Education has general resources on its website intended to help all schools prevent adult sexual misconduct, including misconduct by JROTC instructors. For example, Education published guidance on training staff and developing policies to prevent adult sexual misconduct.¹¹ In addition, Education has online training on how to recognize and report adult sexual misconduct in a school setting.¹²

Finally, in June 2018 and in 2022, Education sent states information to help states and school districts understand their responsibilities under a federal law that requires them to have rules prohibiting schools from helping school employees obtain a new job if the employees may have engaged in unlawful sexual misconduct with a minor or student.¹³ For example, states may prohibit schools from expunging information about substantiated allegations of adult sexual misconduct from employee records. Education officials told us that the rules issued by states or schools under this law would apply to JROTC instructors that are school employees.

How does Education respond to adult sexual misconduct complaints involving JROTC instructors?

Education’s Office for Civil Rights (OCR) follows standard investigative procedures when it receives any complaint, including complaints alleging sex discrimination involving sexual misconduct as described in its case processing manual. OCR’s role is to determine whether the allegations constituted unlawful discrimination by a school or school district under Title IX. For example, OCR may assess whether a school district promptly and equitably responded to an allegation or whether the district implemented supportive measures, such as separating the complainant and respondent. If OCR determines that the school

responded in accordance with its Title IX obligations, then the school's conduct would not constitute unlawful discrimination based on sex.

According to Education officials, the agency has received few complaints involving JROTC. Specifically, Education officials told us that it received six complaints related to sex discrimination in JROTC programs between November 2022 and August 2024.

How are adult sexual misconduct and sex discrimination related?

Adult sexual misconduct refers to a range of behaviors by adults, including when an adult sexually assaults, sexually harasses, or attempts to develop an intimate or sexual relationship with a student.

Sex discrimination refers to actions that are prohibited by Title IX of the Education Amendments of 1972 (Title IX). With some exceptions, Title IX generally provides that no person shall, on the basis of sex, be excluded from participating in, be denied the benefits of, or be subjected to discrimination under an education program or activity operated by an entity that receives federal funding, such as public schools.

Adult sexual misconduct may be the basis of an allegation of sex discrimination. For example, a school may violate Title IX if it does not respond appropriately to a report that a teacher is engaging in adult sexual misconduct.

Source: GAO analysis of Title IX of the Education Amendments of 1972 and documents from the Department of Education. | GAO-25-107670

How do Education and DOD share information regarding sex discrimination in JROTC?

In September 2023, Education and DOD signed a MOU to share information to address discrimination, including sex discrimination, in JROTC programs. The MOU states that Education's Office for Civil Rights will send DOD resolution letters, letters of findings, and resolution agreements pertaining to complaints alleging discrimination in JROTC programs or activities in violation of federal civil rights laws. Education officials told us that they do not notify DOD when they first receive a complaint because of privacy issues and because the initial complaint may not clearly state the legal issues. Education's completed investigations include a statement of facts and legal analysis, which these officials believe may be more useful for DOD.

In addition, the MOU states that DOD will notify Education of all complaints alleging discrimination in violation of federal civil rights laws, including sex discrimination in JROTC programs. DOD officials told us they notify Education of all allegations of adult sexual misconduct that could meet Education's definition of sex discrimination.

Education officials told us that generally they do not open investigations based on the information DOD provides because the information is not a formal complaint against a school or district. However, Education officials said they review the information from DOD to determine if the allegation occurred in a school district in which Education has an ongoing investigation.

Agency Comments

We provided a draft of this report to Education and DOD for review and comment. Education provided technical comments, which we incorporated as appropriate.

How GAO Did This Study

We administered a web-based survey of school administrators at public high schools that operate JROTC programs. The survey collected data from December 2024 to February 2025. The survey asked questions about a range of topics, including characteristics of JROTC programs, how schools prevent and respond to allegations of adult sexual misconduct, and administrators' experiences coordinating with the military services.

To obtain the most recent information available, we asked respondents about their JROTC programs as of school year 2024-2025. Survey recipients were encouraged to coordinate with colleagues when completing the survey, as needed. We conducted pretests with four school principals to check for clarity of questions and flow of the survey and made revisions based on pretest feedback.

Our target population was all public schools with active JROTC programs as of December 2024 located in the 50 states, District of Columbia, and U.S. territories. We used records provided by the Army, Navy, Marine Corps, and Air Force to identify all schools with JROTC programs.¹⁴ Then, we identified the public schools by matching these schools with Education's Common Core of Data's six most recent files from school years 2017-2018 to school year 2022-2023 and kept the most recent year of information for a given school. We separated these schools into four groups based on military service then selected a stratified random sample of 659 schools. To determine the appropriate sample size for the survey, we determined the minimum sample size needed to achieve precision levels of estimates within plus or minus 10 percentage points at the 95 percent confidence interval with an expected response rate of 50 percent.

After deploying the survey, we discovered that one of the sampled schools no longer had an active JROTC program, so we removed it from the sample. This resulted in a sample of 658 schools with active JROTC programs. We received 441 valid survey responses resulting in a response rate of 67 percent.

We generated survey weights to adjust for the different representation of each service group in the population. We performed a nonresponse bias analysis to identify factors significantly associated with propensity of response and subsequently adjusted survey weights for nonresponse. Using these nonresponse-adjusted survey weights, survey estimates are generalizable to the population of eligible schools.

We compared, as appropriate, weighted survey estimates generated for schools by the military service strata as described above. For each subgroup, we produced percentage estimates and margins of error for each level and used these results to assess the significance of the differences between weighted survey estimates.

To examine how Education and DOD communicate regarding adult sexual misconduct in JROTC programs, we interviewed officials from both agencies and reviewed the agencies' memorandum of understanding. We also reviewed relevant federal laws and regulations.

We conducted this performance audit from June 2024 to August 2025 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 the evidence

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

List of Addressees

The Honorable Robert C. “Bobby” Scott
Ranking Member
Committee on Education and Workforce
House of Representatives

The Honorable Suzanne Bonamici
Ranking Member
Subcommittee on Early Childhood, Elementary, and Secondary Education
Committee on Education and Workforce
House of Representatives

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Secretary of Education, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

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Endnotes

¹After conducting nonresponse bias analysis and calculating nonresponse adjusted analysis weights, we determined that estimates using these weights are generalizable to the population of public high schools with JROTC programs as of December 2024. In this report, we use the term “host schools” to refer to this population. Unless otherwise noted, all survey estimates presented in this report have a margin of error no more than +/- 10 percentage points.

²Congressional Research Service, *Defense Primer: Junior Reserve Officers’ Training Corps*, IF11313 (Washington, D.C.: December 2024).

³For more information about the role of DOD and the military services regarding JROTC, see [GAO-26-107524](#) (Washington, D.C.: October 2025).

⁴Each military department has also developed a service-specific addendum to account for circumstances not covered in the standardized MOA.

⁵There is no requirement in Title IX regarding training on preventing sex discrimination, which under certain circumstances includes sexual harassment or sexual misconduct. When fully implemented at the end of school year 2025-2026, DOD’s standardized MOA will require schools to

provide anti-harassment and abuse training to JROTC instructors. Our survey asked administrators whether they require training specifically on adult sexual misconduct.

⁶U.S. Department of Education, *A Training Guide for Administrators and Educators on Addressing Adult Sexual Misconduct in the School Setting* (Washington, D.C.: 2017). [Last accessed on July 2, 2025]

⁷The 2024 NDAA included a provision to address the shortage of JROTC instructors by expanding instructor eligibility to include veteran officers and noncommissioned officers who were honorably discharged in the last 5 years and had served for at least 8 years and current officers and noncommissioned officers in the selected reserve. Prior to this change, federal law generally permitted officers and noncommissioned officers, both retired and active duty on detail, to serve as instructors.

⁸Over the past 2 years, we estimate that 15 percent of Army JROTC, 16 percent of Marine Corps JROTC, and 16 percent of Navy JROTC programs received guidance on preventing adult sexual misconduct in JROTC.

⁹School district policies may require schools to take specific steps when they receive an allegation of adult sexual misconduct, but these steps may vary across school districts.

¹⁰In the 2024–2025 school year, 51 percent of JROTC programs nationwide were Army programs.

¹¹U.S. Department of Education, *A Training Guide for Administrators and Educators*.

¹²“Addressing and Preventing Adult Sexual Misconduct in the School Setting” (online training), Department of Education Readiness and Emergency Management for Schools Technical Assistance Center, updated May 21, 2025. According to Education officials this training will no longer be offered after September 18, 2025.

¹³Elementary and Secondary Education Act of 1965, Pub. L. No. 89-10, tit. VIII, § 8546, as added by Pub. L. No. 114–95, tit. VIII, § 8038, 129 Stat. 1802, 2120 (codified as amended at 20 U.S.C. § 7926).

¹⁴The Air Force administers the Space Force JROTC program. The Coast Guard also administers a JROTC program under the Department of Homeland Security. This report does not examine the Coast Guard JROTC program.