

Public Comment on Draft Policies

Please provide your comments on policies currently proposed for revisions or rescissions, or new policies. Policies are open for public comment for a minimum of 21 days between the First Reading and the Second Reading, when a adopt the policy.

Email *

[Redacted]

Name *

Sylvia McGauley

Email *

[Redacted]

Your School Community *

Buckman

Do you provide permission to post your comments on the PPS website? *

- Yes, with name
- Yes, without name
- No. Share only with Board and District staff

Policy you are providing comment on *

Other (Please indicate which policy in the comments section below) ▼

Please provide your comments below *

I urge you to vote against the proposed policy change which would allow JROTC into PPS high schools. Although I am a Portland resident, I taught for many years in a school with a JROTC program (Reynolds HS in Troutdale, OR). I witnessed first-hand the on-campus weapons training and regular drill practice and countless other problems detailed below. In fact, one of our students honed his marksmanship skills in the JROTC classroom and then, with a guitar case full of guns and ammunition, proceeded to attempt a mass shooting in our school on June 10, 2014. Tragically, two students died that day, and a teacher was injured by a bullet. Guns and military training simply do not belong in our schools.

I urge to read the following information. It comes from years of ongoing research and personal experience. I look forward to your response.

The Junior Reserve Officer Trainings Corps (JROTC) was originally developed under the National Defense Act of 1916 as a tool to recruit and train young people to increase U.S. readiness in the face of World War I. In the 1990s, the program experienced rapid expansion, which continues to this day. The military courses are taught in high schools by retired military personnel and are a highly successful recruiting and public relations tool for the military. As William Cohen, then Secretary of Defense, said in 2000, "JROTC is one of the best recruiting devices that we could have."

Financially, JROTC is a net loss for school districts. PP is facing a \$30 million budget shortfall. Staff will be laid off and programs cut. JROTC is actually a costly program for districts. While schools may take on a JROTC unit hoping to gain resources, in fact, JROTC drains resources from other educational programs because of the unequal cost-sharing formula and a requirement that at least twice as many JROTC instructors be hired than are normally needed to support the number of students in the program. There are also costs to the school district for special equipment and facilities requirements of the program. (See addendum 1)

The JROTC instructor's salary is determined by a complicated formula based on what each JROTC teacher's active-duty military salary would be, minus his or her military retirement pay. Half of this difference is the maximum amount the DoD will pay the school district. The district then pays the rest even if the instructor's final pay outpaces the salaries of experienced educators in that district. Furthermore, the district must pay for all the normal benefits and employer-paid taxes that it provides for other teachers, with no DoD help. (See Addendum 1)

JROTC teachers are not certified in the same way as other school district teachers. In some states they are not required to have more than a GED. The military decides who is qualified to be a JROTC instructor and then presents them to the school district for hiring. In Oregon, according to TSPC, they are only required to have a Bachelors' Degree and pass a test about diversity in Oregon history. Additionally, they must meet the Pentagon's requirements, which includes a minimum of 15 years of military experience. There is no requirement to take classes in education or teaching methodology or have a basic or standard teachers' license.

JROTC personnel have been convicted of sexual harassment and abuse at a disproportionately higher rate than trained non-JROTC teachers according to both the Military Times and the New York Times. a New York Times investigation – which included an examination of thousands of court documents, investigative files and other records obtained through more than 150 public disclosure requests – has found that the program has repeatedly become a place where retired military officers prey on their teenage students.

In the past five years, The Times found, at least 33 J.R.O.T.C. instructors have been criminally charged with sexual misconduct involving students, far higher than the rate of civilian high school teachers in jurisdictions examined by The Times. Many others have been accused of misconduct but never charged. (Mike Baker, New York Times, July 7, 2022.)

In November 2022, "Defense Department officials confirmed the number of substantiated allegations of sexual abuse since 2017 was nearly double that, at 58. Several other allegations are still pending." (Leo Shane III and Davis Winkie, Military Times, Nov. 16, 2022) It is irresponsible to subject our students this potential danger.

There is no evidence that JROTC helps keep students in school, as some have claimed. The statistics cited by the JROTC program have been incomplete and offer no evidence that the program reduces the number of students leaving school before graduation. Rather, many of the other programs that schools are cutting—like music, arts, counseling, library staffing and specific programs designed to keep students in school—reach more students and are more effective in motivating them to stay in school. Even when districts permit JROTC students to receive CTE credit, they are no more likely to graduate than students who complete other CTE programs. (Statistically, there is about a 10% increase in graduation rates for students who complete any CTE program, including JROTC programs that have been classified as CTE programs.)

JROTC is not Career and Technical Education (CTE). According to the ODE website, "CTE programs use 21st century technology to support students in acquiring technical skills, professional practices, and academic knowledge critical for career success in high-wage, in-demand careers."

None of these high-wage, in-demand career areas include drill, shooting practice and shooting competitions, and military training. Nor should they. Beyond the military, JROTC instructors simply are not qualified to provide technical training for any civilian career, including careers in "Law, Public Safety, and Security Programs of Study" – part of the Human Resources Cluster. For students interested in this area, training by licensed and experienced attorneys, social workers, and law enforcement professionals would provide our students with broader and more equitable and relevant learning opportunities. Even if the school district says they want the JROTC program to include presentations by professionals in civilian security and public safety programs, the overall curriculum and allocation of time devoted to various elements of the curriculum, as well as curricular materials such as textbooks, are still under the control of JROTC.

The military is not an economically viable career. According to a recent Military Times article by Retired U.S. Army Maj. Gen. John G. Ferrari, a senior nonresident fellow at the American Enterprise Institute think tank, most fast-food workers in California make about 18% more than an Army E-3 or E-4 enlistee with less than 2 years' experience. Additionally, the Blue Star Families' Annual Military Family Lifestyle Survey revealed that the likelihood of military families to recommend the military has dropped significantly. In 2023 only 32% of active-duty family respondents were likely to recommend military enlistment.

Regardless of the public relations materials, JROTC is designed as a pipeline for enlistment in the U.S. military, not as a conduit for "career success in high-wage, in-demand careers."

Is this really the kind of career option we want to promote for our students? By installing JROTC programs in our schools, we give the military not only a cloak of legitimacy, but a signal of approval. We send our students and their families the message that military enlistment is a worthy choice for our students' growth and development and success in the world. The statistics show otherwise.

Most JROTC programs occur in schools in working class or impoverished schools and communities, which, due to structural racism in our society, have a higher percentage of students of color. Officially, JROTC is not considered a recruiting tool by the Department of Defense (DoD), but the DoD encourages the relationships between JROTC instructors and military recruiters. Despite the DoD's claim, more than 50% of JROTC cadets with two or more years of JROTC experience join the military as enlisted personnel. More often than not, those schools are also predominately populated by youth of color. Most affluent families do not

choose the risks of military enlistment as an option. Therefore, recruiters and JROTC programs rarely appear in more affluent schools. (JROTC requires a minimum number of enrolled students, and more affluent schools struggle to meet that minimum without forced enrollment in the program.) If such programs are not good enough or safe enough for the privileged in our society, is it equitable to promote them for the poor and disenfranchised? (See Addendum 2)

JROTC is not leadership training. While our schools focus on teaching students to develop critical thinking and democratic leadership skills, and how to resolve conflicts through democratic and nonviolent means such as restorative justice and peer mediation, the JROTC practices and teaches a top-down command structure in which students are taught to give and obey orders according to rank and without question. In my high school, I observed a JROTC instructor teaching students to close ranks and boldly lie when faced with unwanted questions and critique.

The JROTC leadership model requires students to lead and practice drills. Non JROTC teachers complain about JROTC students out on the field or in the hallways and common areas with no staff supervision.

JROTC is such an effective recruitment tool that one Dept. of Defense official told Congress that the proportion of JROTC graduates who enlist is "roughly five times greater than the proportion of non-JROTC students." This aspect of the program may not be apparent to administrators since many JROTC students who join the military do so after leaving high school. (See Addendum 3)

JROTC curricula, including the textbooks, are created by the Pentagon, which contracts with Pearson Publishers. The local school district has no control over their content. The local school district does not review materials for content appropriateness, accuracy, and conformity to academic standards. The texts contain numerous inaccuracies and distortions. JROTC teachers aren't required to have a college degree and rarely have credentials to teach many of the subjects the curriculum covers—e.g., history, civics, literacy skills such as reading and writing and speech, political science, etc. JROTC propagandizes students—A review of JROTC materials reveals that students are being presented with a one-sided, partisan view of political and historical events. Schools have an educational, moral and legal responsibility to refrain from giving support to only one side in such controversies.

JROTC includes weapons training and contradicts school-based initiatives that encourage students to settle disputes nonviolently. At a time when schools across the country are employing a variety of methods, such as restorative justice and peer mediation, to curb incidents of violence in the schools, create safe learning environments, and teach peaceful means of conflict resolution, JROTC's introduction of weapons training, its partnership with the NRA to sponsor marksmanship matches, and its modeling of top – down militaristic solutions to problems contradict the schools' stated opposition to violence.

Critics have been successful in getting JROTC to discontinue the use of live weapons in schools on a national level, but units continue to use air rifles, which use lead shot, for target practice on school grounds. At Reynolds High School in Troutdale, Oregon, the shooting range was inside one of the JROTC's classrooms. The school shooter at Reynolds HS in 2014 honed his marksmanship skills in RHS's JROTC program. Weapons have no place in school.

JROTC does not comply with trauma-informed policy. Too many Portland students and / or their families and friends have been victims of gun violence. Many of our refugee students have experienced the violence of war. Having guns and marksmanship training on campus could too easily trigger PTSD in students.

JROTC is not Wellness / Physical Education. JROTC instructors are not trained physical education / wellness teachers.

JROTC can limit students' chances of getting into college and vocational education programs. JROTC is not an "academic" subject and unlike subjects like math and foreign languages, JROTC credits are not counted towards entrance requirements for many state universities and colleges. Students in some states can hurt their chances for college acceptance if they waste their time in JROTC classes instead of taking academic electives. In states like California, JROTC grades are excluded when computing grade point average for student aid eligibility.

Although students never should be coerced or tracked into JROTC classes, in some districts, students are involuntarily enrolled in JROTC, or it is offered as an alternative to real Wellness / P.E. classes, taught by trained teachers, or required Career Technical Education (CTE) classes taught by trained practitioners in various fields. JROTC should always be voluntary.

The school district should never allow JROTC to fulfill core requirements like P.E. or CTE courses. JROTC is not college / vocational prep, and as school districts divert precious resources to JROTC's needs for FTE, space in the schedule, and classroom real estate, it robs students of equitable opportunities to access classes which truly prepare them for post-secondary education and training programs.

In 2010, San Diego Unified School District shut down the JROTC program at Mission Bay H.S. after students argued that the program interfered with students' opportunities to take academic coursework and therefore limited their ability to access 4-year colleges after high school.

The college benefits offered to cadets (i.e., ROTC scholarship money and possible military academy appointments) require them to join the military. Students are promised that if they join JROTC—which does not count for most college admissions—for at least three years, they can enlist in the ranks at a slightly advanced pay grade.

JROTC is military training and does not belong in our public educational system. The military is not in the business of being altruistic. The sole mission of the United States military is to prepare for and fight wars. All military programs – recruitment programs, JROTC, ROTC, ASVAB test, military partnerships with schools, research and development programs – are designed as tools for fulfilling this goal. In a free country, our students should have the option of becoming a part of this mission when they graduate, should they so choose. However, our schools must teach and encourage students to make fully informed choices. Unfortunately, due in part to the fact that their job security relies on meeting certain enlistment quotas, military recruiters and JROTC personnel are notorious for not disclosing the whole truth and for making promises – verbally and in writing – that can be broken at any time. As educators, it is our duty to insist on a system of full disclosure. It is our duty to not embrace a program that uses propaganda and coercion to push young and vulnerable youth to make life altering decisions before they have even reached adulthood. When our students enlist in the military, they lose their constitutional rights. Rather they are governed by the Uniform Code of Military Justice – UCMJ. When our students sign the military contract, they agree, usually unknowingly, to do what is ordered of them, regardless of promises, written or oral, that recruiters made.

FOR ALL ENLISTEES OR REENLISTEES:

b. Laws and regulations that govern military personnel may change without notice to me. Such changes may affect my status, pay, allowances, benefits, and responsibilities as a member of the Armed Forces REGARDLESS of the provisions of this enlistment/reenlistment document.

c. In the event of war, my enlistment in the Armed Forces continues until six (6) months after the war ends, unless my enlistment is ended sooner by the President of the United States. [Source: see U.S. Military Enlistment / Reenlistment Document, Part C, Section 9b, 9c]

When our students enter the military, they too often become cannon fodder subject to high-risk situations

which all too frequently cause lifelong trauma and mental and physical disability, if not death. As Michael Eschete, former marine, who testified at a Student Success Committee meeting in December, noted in an interview with the Oregonian, a significantly high percentage of unhoused persons are vets suffering from PTSD. Evidence shows that domestic violence and high suicide rates are especially prevalent in households with veterans. "Through Central City Concern and the Portland Rescue Mission, where he also works as a volunteer, he began to recognize that veterans make up a stubborn subset of the homeless or at-risk population. Now fifty, he's beginning to see veterans of the new wars show up on the streets. He says he's talked to young veterans who came home, changed by war and eventually wore out their welcomes with parents, spouses or friends. They've burned through their cash, have trouble holding a job and have dwindling options."

When our students of color enter the military, they face insidious racism which leads to a disproportionate majority of officers being white, while most people of color remain cannon fodder. See: Cohen, Zachary and Boschma, Jani. CNN. "Military data reveals dangerous reality for black service members and veterans" Sun June 14, 2020 Military data reveals dangerous reality for black service members and veterans | CNN Politics Do you really want to promote JROTC, with its goal of military enlistment, as a career pathway, for our students?

Sincerely,
Sylvia McGauley

Some questions to ask about JROTC units and JROTC military academies:

How much will the school district spend this next year on JROTC? How much will it spend in future years?

How much is the military funding the program? Will the military's share decrease over time?

Will other elective programs and student services experience budget cuts (e.g. social studies electives, music, sports, P.E., CTE, art, career guidance, counseling, school nurses, bus transportation)?

Will other programs be displaced?

Will JROTC textbooks be reviewed in the same way as other new curricula? Does the curriculum meet school district and state academic standards?

Will the JROTC curriculum, including the textbooks, be reviewed by the local school district for content appropriateness, accuracy, and conformity to educational standards? When? And what will be the process and timeline for doing so?

How do licensure requirements for military instructors compare to those for other teachers? Are military instructors "highly qualified" under NCLB?

If the program is touted as appropriate for "at-risk" youth, who can participate? Will the program be closed to students who do not meet minimum standards for grades and behavior? Does it really target those youth most at risk?

Do students with special educational requirements and students with physical disabilities and immigrant students without papers have full access to the program?

Can openly gay and lesbian students access the college benefits offered through the program?

Do the hiring practices of the U.S. military conform to nondiscrimination policies of the school district, since the school district cannot choose the instructor who they employ (especially hiring of women, gays and lesbians, immigrants)?

Are JROTC facilities comparable to those available to other classes? If there are special facilities, are they available to non-JROTC students?

How does the JROTC unit conform to the school district's military recruitment policy? Are options besides the military promoted equally?

Will there be lead abatement for the on campus shooting ranges?

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Addenda:

1. How JROTC is a net drain on civilian school funds:

(For further documentation, see

https://www.usarmyjrotc.com/jrotc/dt/5_EstProg/ProgramInformation.html, JROTC Education Briefing and JROTC White Paper April 2010)

Under the standard JROTC contract, the Department of Defense provides students with books, uniforms and special equipment such as pellet rifles. The school district must provide insurance, building facilities and maintenance, and must assume responsibility for paying instructors' salaries and all the normal

employment taxes and benefits that cover regular teachers. JROTC instructors must be retired military officers approved by their military branches. They are not required to meet the same qualifications as other teachers.

The school district receives from the DoD only a partial contribution toward instructors' salaries and nothing toward the substantial cost of employment taxes and benefits. The subsidy amount for each instructor is calculated based on the military pay and housing allowance the officer would receive on active duty, minus his or her military retirement pay. This difference is then cut in half and the result is the maximum amount the DoD will pay the school district.

Public and private educational institutions apply for JROTC units and commit to share costs and meet standards.... Services reimburse schools for a percentage of instructor pay and provide uniforms, equipment, and an accredited and rigorous curriculum. (Source: JROTC White Paper April 2010 and Congressional Research Service. Defense Primer: JROTC, 2021.

- Instructor Pay - 05 retired w/ 20 yrs AFS
- BP + BAS + BAH (5000 + 170 + 1300) = 6470
- Minus Retired Pay (50% of BP at 20 yrs) = 2500
- Equals MIP (6470 - 2500 = 3970)
- MIP x 50% (3970 x 50% = 1985 (Army reimburses the school))

(Source: JROTC Education Briefing

https://www.usarmyjrotc.com/jrotc/dt/5_EstProg/ProgramInformation.html)

The JROTC contract requires the hiring of a minimum of two retired officers (one a non-commissioned officer) for the first 150 students enrolled as cadets at a school. After 150, another instructor must be hired for each additional increment of 100 cadets (e.g., three instructors for 151-250).

A minimum of 100 cadets in grades 9 – 12 organized into a chain of command make up a JROTC unit. Two instructors, normally consisting of one retired officer (the Senior Army Instructor, or SAI) and one noncommissioned officer (the Army Instructor or AI) teach a rigorous curriculum and supervise cadets in all their activities. Additional staffing may be authorized for enrollments above 150 cadets. Services reimburse schools for a percentage of instructor pay and provide uniforms, equipment, and an accredited and rigorous curriculum.

(Source: JROTC White Paper April 2010)

It's important to note that only one (or less) non-JROTC classroom teacher would normally be hired to teach 150+ students. Furthermore, JROTC cadets are generally allowed by schools to take the class in place of physical education, and a single PE teacher would normally support 250+ students. So if JROTC were eliminated in a school district, less than half as many teachers would need to be hired to replace them. In other words, to have JROTC, a school district must more than double the staff normally required for the number of students involved. Because the federal subsidy amount will likely cover less than half the total salaries and none of the employment taxes or benefits for two (or more) JROTC instructors at each school, schools wind up using extra money from their budgets to, in effect, subsidize a high school military training/recruiting program for the Pentagon.

For example, when Air Force JROTC was introduced at Vista High School in Vista, California, the projected net cost to the district for two JROTC instructors to teach 95 cadets was:

Salary, plus taxes and benefits \$79,386

Federal subsidy -28,305

Net JROTC expense 51,081

In comparison, one PE teacher was allocated for an average of 250 students at Vista HS, therefore .38 of one PE teaching position would have been required for those 95 cadets. The total cost for that portion of a PE teaching position, including taxes and benefits, was \$52,250 x .38 = \$19,855.

The projected net loss to the Vista school district was:

Net JROTC expense \$51,081

Net cost for .38 PE allocation -19,855

Net loss of funds 31,226

(Data source: Vista Unified School District)

While it is certain that the numbers for salaries and benefits have increased since 1995, the basic formula for calculating the true cost of JROTC is the same today: determine the total net cost for all JROTC staff and subtract the total net cost for alternative teaching staff needed to support the number of students in JROTC. The difference will reveal how much additional money would be freed up for other uses if JROTC were cut from the district's budget.

School board members are often given budget summaries from district staff that include the net cost for JROTC, but without the critical comparison to the cost for substituting JROTC with classes like PE or other electives that meet graduation requirements. This makes it difficult for them to make fully informed decisions about which programs to eliminate when they need to make budget cuts.

According to JROTC Education Briefing

[https://www.usarmyjrotc.com/jrotc/dt/5_EstProg/ProgramInformation.html],

the school must provide:

- Credit for coursework
- Classrooms (including desks/tables), office space (including desks, cabinets, etc.), storage, telecommunications, drill area
- Partial instructor salaries
- Like benefits for instructors and students (teacher / student parody).

The Army provides:

- Educational / audiovisual materials
- Classroom equipment
- Student textbooks, curriculum guides, instructor materials
- Unit support and maintenance funding
- Uniforms and organizational equipment (though sometimes students are required to contribute to the costs of uniforms)
- Special team equipment (Color Guard, Drill Teams, Marksmanship Teams)
- Partial instructor salary reimbursement

[Title 10, US Code Section 2031; DODI 1203.15; AR 145-2; CCR 145-2; Contract]

2. By law, participating host schools are required to maintain participation levels of 10% of the student body, or 100 students, whichever is less. The military departments establish criteria for unit placement. For example, the Army maintains an Order of Merit List, based on a point system that awards credit to institutions for categories such as Title I status under the Elementary and Secondary Education Act (P.L. 89-10, as amended), local indicators of need (e.g., high unemployment or illiteracy), student enrollment, school financial solvency, and fair and equitable distribution of JROTC programs among states.

3. Documenting the way JROTC has been used as a recruiting tool, Memorandum #50 (1999), from U.S. Army Cadet Command, ordered JROTC instructors to help the military recruit students into the Army. A more recent memorandum dated Oct. 6, 2008 rescinded Policy Memorandum #50. However, it is important to note that for years prior to the issuance of Memorandum #50, and during the nine years it was in effect, proponents of JROTC continuously claimed it was not a recruiting program. Memorandum #50 was not, in fact, the only proof of JROTC's recruiting function. For example, DoD officials have repeatedly boasted of its success as a recruiting tool in testimony given to Congress. The rescission of Memorandum #50 does not change this.

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