

Scott Yenor

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*Gender Integration and the Collapse  
of the Virginia Military Institute*



CLAREMONT INSTITUTE  
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## **NOT ENOUGH GOOD MEN**

*Gender Integration and the Collapse  
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The assault on single-sex institutions—from military schools to the boy scouts—took off with the Supreme Court’s 1996 decision in *United States v. Virginia* (1996). In this decision, the court banned single-sex education at Virginia Military Institute (VMI). In her majority opinion, Justice Ruth Bader Ginsburg wrote that the school’s tough competitive atmosphere and “adversative system” for training men through hardship would remain unchanged by admitting women. “The notion that admission of women would downgrade VMI’s stature, destroy the adversative system and, with it, even the school,” she wrote, “is a judgment hardly proved.”<sup>1</sup>

In reality, VMI has become a case study in how institutions lose their distinctive character and purpose when forced into conformity with the leveling principles of our reigning civil rights ideology. The school’s once-famous

standards have been eroded, its core values replaced with bureaucratic boilerplate, its connections to tradition and the past broken, and its culture hobbled by the artificial imposition of modern sensitivities.

Meanwhile, the logic of Justice Ginsburg’s opinion—that single-sex institutions are artifacts of prejudice—has mostly won out as a matter of law, making it more and more difficult for all-male institutions to defend their right to exist. Americans increasingly oppose discrimination on the basis of sex differences in the abstract. Private all-male clubs like Augusta National, which integrated in the years after the VMI decision, face relentless public pressure to change as well.

In the face of litigation and threats of litigation, single-sex schools are forced to grant the premise that only “gender-neutral” goals like improving test scores or graduation rates are defensible under the law. They cannot invoke the notion that men and women might be *inherently* oriented toward somewhat different social destinies.<sup>2</sup> A series of Supreme Court cases establish that state and national laws may make no assumptions about what women or men are more likely do with their lives, lest they run afoul of our reigning civil rights doctrines. Thus, single-sex schools are on the defensive, especially for those schools receiving public funds. Publicly supported schools of this sort thus often take years to open, if they ever do.

Despite these obstacles, the number of single-sex public schools has more than doubled since *US v. Virginia*, reaching nearly 400 in 2022.<sup>3</sup> Male-only private boarding schools, which seemed to be a dying breed, are popping up across the country.<sup>4</sup> Clearly the demand for single-sex spaces and training programs still exists. But *US v. Virginia* and its consequences stand in the way of the kind of education that points young men and women toward at least somewhat different social destinies.

The sexes are indeed different. Inspiring men and women to cultivate their distinctive gifts is a positive social good. Nor is it a zero-sum game: to attend to men is not to disenfranchise women, or vice versa. Each sex thrives when the other is nourished. To acknowledge these realities and to rebuild a social structure that takes them into account, will require doing more than simply overturning *US v. Virginia*. It will require actively affirming that governments and private entities can support institutions that point men and women toward complementary but distinct modes of excellence.

### **The Siege on the Barracks**

The feminist critique of single-sex education is the logical conclusion of second-wave feminism. First-wave feminists had hoped that granting women the basic rights of citizenship (e.g., the rights to vote and to own property) would suffice to level out the social distinctions between men and women.<sup>5</sup> When significant disparities persisted despite this feat of social engineering, second-wave feminists concluded that greater, more intentional cultural transformation would be necessary to bring about “women’s equality” in the form of metrical uniformity across all measurable areas of life. Flagship policy proposals put forward by second-wave feminists therefore included robust anti-discrimination laws for employment and laws promoting sexual liberation (e.g., legalizing contraception and abortion).

Few second-wave feminists directed sustained attention to single-sex education until the 1980s, though even before then, many had hoped that male-only clubs could eventually be delegitimized in some way. During the 1980s and especially the 1990s, second-wave feminists came to think that cultural transformation also meant

ending single-sex, especially male-only, schools. These schools, they believed, secured privileged and exclusive networks for males; perpetuated sexist attitudes or gender stereotypes about what girls and boys are capable of; and often assumed that education should point men and women toward different life goals—including not only those of father and provider for men, and motherhood and homemaker for women, but also different “gendered” professions for each.<sup>6</sup> Rather than single-sex (and especially male-only) schools, second-wave feminists claimed to be interested in co-education that would foster feelings of equality and mutual respect while breaking down old stereotypes about manhood and womanhood. Not all admitted that sex integration would transform the relevant institutions. But no one could articulate where or how the desired cultural transformation would end.

The effort to end male-only schools accelerated in 1990, when President H. W. Bush’s administration brought action against VMI for sex discrimination. Bill Clinton’s administration picked up the case when he took office in 1993. At every stage of litigation, VMI argued that the admission of women would fundamentally transform the institute’s unique military culture, since it was specially tailored to the unique attributes of most men. The district court and the panel in the Fourth Circuit sided with VMI. In 1996, President Clinton’s Department of Justice appealed to the Supreme Court and won.

In his dissent, Justice Antonin Scalia predicted that *US v. Virginia* would sound the death knell for single-sex public education. “Under the constitutional principles announced and applied” by the court majority, Scalia wrote, “single-sex public education is unconstitutional.”<sup>7</sup> Before *US v. Virginia*, the court subjected sex discrimination to “intermediate scrutiny,” which allowed many laws discriminating between the sexes to survive. Scalia thought



the *US v. Virginia* court had *sub silentio* abandoned intermediate scrutiny for what was, in effect, the “strict scrutiny” required of race classifications. For all his eloquence, however, Scalia was not quite right: single-sex education has not so much been killed by *US v. Virginia* as it has been neutered.

The lower courts had ruled that VMI’s single-sex policy served its adversative training policies, which in turn were “substantially related to an important government objective”—that is, providing educational excellence and maintaining diverse educational institutions in the state of Virginia. But because of previous precedents, Virginia was simply not allowed to argue that it was legitimate on its face for the state to maintain educational institutions that guide men and women toward different ideals and aspirations. Arguments in favor of single-sex institutions had to identify some secondary purpose that the separation of the sexes served, rather than arguing for it in its own right. In this sense, VMI had to fight with its strongest hand tied behind its back. The school’s defenders had to speak in terms of institutional diversity or educational excellence, not manly honor.

Although precedents prevented VMI from defending its distinctive culture, at issue in the case was the empirical question of whether VMI’s distinctive culture could survive sexual integration. And this was one of the points on which the Supreme Court’s majority opinion turned. Lower courts held that the admission of women would transform VMI. Ginsburg claimed to know better.

The notion that admission of women would . . . destroy the adversative system and, with it, even the school, is a judgment hardly proved, a prediction hardly different from other “self-fulfilling prophec[ies]” once routinely used to deny rights or opportunities. . . . Women’s successful entry into the military academies, their participation in the

Nation's military forces, indicate that Virginia's fears for the future of VMI may not be solidly grounded.<sup>8</sup>

All the expert testimony in the world would not shake Ginsburg's belief that sex differences are no longer relevant, if they ever were; policies based on claims about sex differences are, in this view, simply stereotypes. The idea that women would demand changes to the adversative method was, in her view, a mere prejudice based on an outmoded view of women as demure, uncompetitive, pacific, and inclined to domesticity. Surely American women would adopt the fierce attitudes of Viking shield maidens if given the chance. Evidence to the contrary, piles of which were presented in the lower courts, was itself to be discounted as irrelevant in Ginsburg's view.

On the other side of the debate were Scalia and the lower courts. William Hurd, who litigated *US v. Virginia* on behalf of the Commonwealth of Virginia, thought the majority "did not reach its result by distorting the law" on the levels of scrutiny, "but by ignoring the record" or dismissing it.<sup>9</sup> Both parties to the case stipulated to the idea that VMI would have to change its fundamental character in order to admit women. As the trial and district court held, barracks life—where private discipline was enforced by a total disregard for personal privacy—would be upended if VMI admitted women. Locked doors and coverings on windows would frustrate the censors and surveillance that had previously kept order; the "intensity and aggressiveness" of the previous physical training program would have to be modified;<sup>10</sup> uniformity in clothing and grooming would give way to ever-increasing expressions of individual taste. VMI would be "significantly different upon the admission of women," wrote Scalia, quoting the district court's majority opinion. The school would eventually find it necessary to drop the adversative system altogether."<sup>11</sup>

Ginsburg's Supreme Court majority made no effort to refute the claim that VMI would have to change—they simply shrugged it off as mere prejudice. This trump card—derived from second-wave feminism's tactic of obviating counterarguments through name-calling—was the heart of Ginsburg's opinion. Scalia wrote that it “rendered the trial a sham.”<sup>12</sup>

### **Code of a Bureaucrat**

In principle, VMI was allowed keep the exact same admission standards, adversative training methods, and other distinctive while admitting only those tough, thick-skinned women able to pass muster. Perhaps only a few women per year would be admitted. Even fewer might be retained. Josiah Bunting III, VMI's president during *US v. Virginia* until 2001, insisted that “female cadets [would] be treated precisely as we treat male cadets. I believe fully qualified women would themselves feel demeaned by any relaxation in the standards the VMI system imposes on young men.”<sup>13</sup> Everyone would get buzz cuts. Everyone would have to run a mile within the same time limits. All would be treated the same—like dirt.

In reality, though, the logic of civil rights law would never allow VMI to admit only the tiny fraction of women who could meet its previously exacting standards. Instead, civil rights bureaucrats and future courts would be likely to take low female admission rates as evidence that the standards themselves were forms of covert discrimination or that VMI was foot-dragging on the woman question. Predictably, as in all such cases, the standards would have to change.

In this way, admitting women to VMI created an endless demand for accommodations so that the ladies would feel as welcome as the men. The probability that this dy-

namic would destroy the school led many members of the VMI's Board of Visitors to consider taking the school private. Nevertheless, VMI integrated and stayed public on a narrow nine to eight vote. Among those eight were five who signed on to a statement that VMI would eventually be "fundamentally changed in such a way that neither men nor women" would gain from the mental and physical stress of the military program.<sup>14</sup>

The VMI experience since *US v. Virginia* shows that, in fact, it was not Scalia but Ginsburg—with her resolute denial that the natural differences between men and women could warrant institutional distinctions—who was indulging in a fantasy and trading science for a dead-end ideology. VMI has changed in substantial, and predictable, ways as a result of the decision, essentially forced on it from above, to admit women.

Initially, under Bunting, VMI sought to maintain a strict uniformity between the sexes. But by the early 2000s, after Bunting left, standards were relaxed across the board to make things easier for women. Male cadets now have to perform a minimum of five pull-ups, while one is sufficient for females.<sup>15</sup> Male cadets must run 1½ miles in 12 minutes, 30 seconds; females, meanwhile, get almost an additional two minutes.<sup>16</sup> In 2001, female cadets were allowed to eschew buzz cuts for more feminine hairstyles. Current hair standards allow females to grow hair down to their shoulder blades.<sup>17</sup>

Initially, cadet doors remained unlocked by policy, but the administration recently installed locks on cadet doors.<sup>18</sup> A culture of mutual accountability gave way to a policy of administrative surveillance. Cameras are being installed too. In the past, problematic students would be mustered out; with cameras and locks on doors they can be regulated and stopped but retained.

No change is more important or illuminating than the dropping of the old VMI “Code of a Gentleman” for the “Code of a Cadet” in the early 2000s, and 2022 brought an even more inclusive format.<sup>19</sup> The old Code of a Gentleman was stoical, demanding silence on matters of private importance (finances, girlfriends), sturdy independence within a hierarchy (a gentleman “does not lick the boots of those above” nor “kick the face of those below him”), and self-control in matters relating to drink, gambling, and other vices. The old Code situated VMI within a military tradition in the West dating back centuries, eschewing fads and embracing the Western and Christian traditions. A VMI gentleman, was above all, “the descendent of the knight, the crusader... the defender of the defenseless and the champion of justice.” *[See insert on the next page.]*

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# THE CODE OF A GENTLEMAN

This text was distributed to first-year cadets at the Virginia Military Institute from the 1920s until 1997.

**W**ithout a strict observance of the fundamental Code of Honor, no man, no matter how 'polished,' can be considered a gentleman. The honor of a gentleman demands the inviolability of his word, and the incorruptibility of his principles. He is the descendant of the knight, the crusader; he is the defender of the defenseless and the champion of justice... or he is not a Gentleman.

A Gentleman...

Does not discuss his family affairs in public or with acquaintances.

Does not speak more than casually about his girl friend.

Does not go to a lady's house if he is affected by alcohol. He is temperate in the use of alcohol.

Does not lose his temper; nor exhibit anger, fear, hate, embarrassment, ardor or hilarity in public.

Does not hail a lady from a club window.

A Gentleman never discusses the merits or demerits of a lady.

Does not mention names exactly as he avoids the mention of what things cost.

Does not borrow money from a friend, except in dire need. Money borrowed is a debt of honor, and must be repaid as promptly as possible. Debts incurred by a deceased parent, brother, sister or grown child are assumed by honorable men as a debt of honor.

Does not display his wealth, money or possessions.

Does not put his manners on and off, whether in the club or in a ballroom. He treats people with courtesy, no matter what their social position may be.

Does not slap strangers on the back nor so much as lay a finger on a lady.

Does not 'lick the boots of those above' nor 'kick the face of those below him on the social ladder.'

Does not take advantage of another's helplessness or ignorance and assumes that no Gentleman will take advantage of him.

A Gentleman respects the reserves of others, but demands that others respect those which are his.

A Gentleman can become what he wills to be..."

In contrast, the sort of cadet the new Code seeks to form has "integrity" while standing "against intolerance, prejudice, discrimination, hate, and oppression." Nothing is to be found in the new strictures that situates the cadet in the Western tradition; nor is anything said about the importance of standing up for justice nor, more shockingly, anything even intimated about the necessity of self-sacrifice or courage.

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# THE CODE OF A CADET

The current iteration of the Code of a Cadet, as seen in the 2023 Rat Bible for first-year cadets.

**A** cadet's word is their bond.  
A cadet embodies integrity at all times.  
A cadet is a leader of character who offers equal respect, treatment, and understanding to all.

A cadet stands against intolerance, prejudice, discrimination, hate, and oppression.

A cadet productively communicates, lives, and works with people from many backgrounds.

A cadet finds sacred duty to country, state, the Corps, family, and friends.

A cadet embodies a philosophy of physical well-being.

Good manners, grace, proper humor, and humility are commonplace characteristics of a cadet.

A cadet is appropriate in speech, habits, and dress.

A cadet never takes counsel of their fears.

A VMI cadet is a well-mannered, respectful, and properly presented individual who holds themselves and others accountable for their actions and words as a valued member of the Corps. VMI standards are high for a meaningful purpose; to produce leaders of character. A cadet wears the VMI uniform with pride, always remembering and demonstrating what it means to be a VMI cadet.



The newest Code, grammatically incorrect, but politically correct in the extreme, ends with vague platitudes about ill-defined trendy terms:

A VMI cadet is a well-mannered, respectful, and properly presented individual who holds himself [sic] and others accountable for their actions and words as a valued member of the Corps. VMI standards are high for a meaningful purpose; [sic] to produce leaders of character. A cadet wears the VMI uniform with pride, always remembering and demonstrating what it means to be a VMI cadet.

VMI's old ethos was hierarchical but republican. The new one is egalitarian and managerial. Students wrote the old Code of a Gentleman and handed it down by tradition, but it was not formalized or blessed by the administration. Officially, no one had to memorize it. Peers enforced the rules through mentoring and discipline. The Code of the Cadet is formal (written by the administration), and cadets must memorize it. The Commandant's office, in consultation with the Diversity and Inclusion Office, oversees training in the Code and punishes violations. What was once in the hands of the cadets is now in the hands of officious bureaucrats and managers. Informal oversight has disappeared in favor of formal, legalistic, administrative demands, since the student culture, allegedly a product of racism and sexism, cannot be trusted to take the lead.

*The Cadet*, VMI's alternative newspaper, reported on a 2025 speech from VMI's First Class President, Turner Gallo, to the VMI Board of Visitors upon graduation. VMI has seen, according to Gallo, "a shift in standards and a growing disconnect between VMI's ideals and its administrative practices." While "the administration emphasizes modernization and retention, many cadets feel that this comes at the cost of weakening the Institute's character-building rigor."<sup>20</sup>

This has been particularly true since 2021, when the spasms that followed George Floyd's death prompted Governor Ralph Northam's State Council of Higher Education for Virginia to demand "An Equity Audit and Investigation of the Virginia Military Institute."<sup>21</sup> The report, "Marching Towards Inclusive Excellence," is partly a racial reckoning born of the post-Floyd mania and partly a sexual reckoning from the post-#MeToo movement. The report claims that "gender disparities in how cadets are treated persist";<sup>22</sup> that VMI's leadership "fails to make clear that... sexual misconduct" will not be tolerated; that instructors emphasize the problems of lying, cheating, and dishonoring but not discrimination;<sup>23</sup> that VMI has a "culture of not taking women seriously"; that VMI tolerates incidents of "sexist and misogynistic comments on social media"; that VMI refuses to punish men who complain about "preferential treatment" for women in physical standards and discipline;<sup>24</sup> that female recruiting lags behind demands for equity; that sexual assault is more common at VMI than at other public universities; and that one-third of VMI's female cadets think VMI does not adequately address "reports of sexual harassment and assault."<sup>25</sup>

The authors of "Marching" prescribe the standard battery of Diversity, Equity, and Inclusion measures to remedy problems, including dedicating funds to hiring more women; appointing a chief diversity officer; building a DEI plan; intensifying implicit bias training; providing institutional support for victims of sexual violence; expanding Title IX protocols to limit due process; and adopting a social media policy to identify problems with sexism. The report also recommends that "VMI should make LGBTQ issues a priority in its diversity efforts, and should make clear, and enforce, that homophobic conduct and language is unacceptable at VMI."<sup>26</sup>

VMI responded to the report with significant leader-

ship changes, which included hiring its first black superintendent, a chief diversity officer, and an inclusive excellence coordinator.<sup>27</sup> Other changes soon followed as well. A DEI office<sup>28</sup> and Title IX office<sup>29</sup> now regulate VMI's honor and class systems. While the older code stressed that students should police themselves and stigmatized those who bypassed the student-led Honor Court, taking complaints to the administration directly is now said to be courageous when it involves exposing discrimination,<sup>30</sup> defusing a "hostile educational environment,"<sup>31</sup> or putting a stop to "hazing."<sup>32</sup>

The Title IX Office motto is "Respect, Report, Support." The once-storied "rat" system, which had been designed to put new cadets through physical and mental tests with grueling workouts and shaking up new recruits, has been brought into conformity with Virginia's policy.<sup>33</sup> It now exists in name only.

Even a cursory survey of VMI's experience after *US v Virginia* puts the lie to Justice Ginsburg's blithe insistence that the institution could remain substantially unchanged after the admission of women. Further discovery under a pending future legal case will in all likelihood significantly support the evidence proving that VMI has changed fundamentally since 1997. Ginsburg's position cannot survive scrutiny. VMI is *not* what it once was.

### **Restoring Manly Honor**

More is at stake, however, than simply overruling a pernicious opinion. Restoring the status quo ante *US v. Virginia* is not enough. Both sides in the case sidestepped a deep question about the purposes served by single-sex education: is the separation of sexes healthy only when it serves some inoffensively gender-neutral purpose, or can it be wholesome per se, because of the innate differences

between men and women?

Scalia's opinion itself underscores this ambiguity. At one point, he seems to defend VMI, within acceptable legal categories, for serving gender-neutral goals, like "providing effective college education for its citizens."<sup>34</sup> Yet Scalia also notes that military schools have a special interest in employing confrontational methods to prepare fighters and to cultivate manly honor. Those ideals are hardly "gender-neutral"! *Should* they be? Must the goals of education always be strictly egalitarian and gender-neutral? Or can they be sex-specific, to the extent dictated by our sex differences and within the limits defined by our common humanity?

The end of sex segregation at VMI killed the idea that educational institutions could intentionally prepare men and women for different, though equally honorable, futures. Any reversal of *US v Virginia* must revive the case for the legitimacy of more substantial sex differences in education. Overturning the decision simply by showing how the admission of women transformed VMI would be a good start, but it would still entail accepting the premise that sex segregation is only valuable for its effects and not in and of itself. That will ultimately not be enough to reestablish robust, single-sex public education. Nor will it be enough to establish building blocks for further legal victories. *US v. Virginia* must be overturned in such a way as to show that the public can support and benefit from an arrangement whereby men and women are encouraged and equipped for at least somewhat distinct trajectories in life. The goal is to defend an education that embraces gender-specific means to gender-specific ends.

Virginia established VMI during the 1830s so that it could point men (not women) toward lives involving the manly pursuits of valor, honor, and military service. It prepared men for political, economic, and social leadership,

while intimating that women would be less interested in and suited for such roles. Every VMI distinctive—the unlocked doors, the rat line, the old code—underscored the importance of manly honor to the institution's purpose.

During its heyday, VMI was also part of a large, thriving social system that included women-only schools and clubs, to support both men and women as they learned to occupy different but overlapping domains. In 1901, for instance, the Texas legislature created the Girls Industrial College to “combine the traditional literary education with instruction in the domestic sciences, child care, and practical nursing.” Private universities in Virginia like Hollins University led women through a “thorough and elegant education” in literary arts, moral character, and practical skills like teaching and domestic management.

Currently, our civil rights laws—combined with the understanding of equal protection embodied in *US v Virginia*—make it impossible to allow, much less support, any institution that moves men and women along these distinct but complementary tracks. Though single-sex education has survived the *US v. Virginia* decision, it has survived in a dramatically weakened form. Single-sex schools must defend sex segregation in terms of gender-neutral goals like increasing student self-esteem,<sup>35</sup> boosting math and science performance,<sup>36</sup> elevating test scores, helping urban blacks,<sup>37</sup> or reducing behavior problems.<sup>38</sup> In effect, subsequent courts have established a procedure to weed out programs based on “outmoded stereotypes” from legitimate programs based on scientifically established sex differences in learning. Ever since this path to gaining approval for single-sex schools was established, feminists have complained about the “pseudoscience of same-sex schooling.”<sup>39</sup>

No public institution designed to promote manly honor or womanly grace can survive under *US v. Virginia's*

legal rules. Private male-only clubs will, by their nature, *discriminate*. A business that would like to support traditional family life by hiring only male heads of households, or by paying a family wage, will *discriminate*. A national government that prevents women from serving in combat will *discriminate*. Single-sex public schools *discriminate*. Dividing sports into female teams and male teams *discriminates*. All this *discrimination* is based on the assumption that the differences between men and women have great social importance. Ginsburg, however, thought the power of government should be used to erase those differences. A better approach would be for society to harness them, reasonably and voluntarily.

Overturning *US v Virginia* should be part of the legal and political effort to establish this better approach. VMI's attachment to an old-fashioned concept of manly honor, Scalia wrote, "made it, and the system it represents, the target of those who today succeed in abolishing public single-sex education."<sup>40</sup>

Overturning *US v. Virginia*, and the legal regime out of which it grew, would re-empower governments to support traditional sex roles within family life and to promote different aspirations for men and women in society. It would allow the private economic sector to do so as well, just as churches are free to do today.

A sound policy must allow private entities and government to guide men and women toward distinct destinies. Governments should be allowed to prepare men for leadership and responsible provision, while preparing women for domestic management and family care. The case against *US v Virginia* should not only reassert the record of sex differences from the original case but also show how the idea of manly honor has been deconstructed at VMI since its sexual integration, defend the public utility

of manly honor specifically, and argue (within reason) for distinct sex roles as a positive good.

Victory in a case like this would create space for additional victories that uphold sex-specific goals. It is legitimate for the public, through governments, to build institutions dedicated to cultivating manly honor. It is to be passionately hoped for that an American locality or state, recognizing the sad condition of many boys—especially boys without fathers—might reinstitute a boys' military school dedicated to competence and honor. Public laws, under a new dispensation, could reflect different intentions for men and women in family life. Private businesses that would like to support traditional families might win space for pursuing their vision.







## ABOUT THE AUTHOR

**Scott Yenor** is a Washington Fellow at The Claremont Institute's Center for the American Way of Life. His research focuses on feminism, sexual liberation, and on dismantling the rule of social justice in America's universities.

Yenor is author of *Family Politics: The Idea of Marriage in Modern Political Thought* (2011) and *The Recovery of Family Life: Exposing the Limits of Modern Ideologies* (2020). In addition, his academic publications have appeared in *Law & Liberty*, *The Federalist*, *City Journal*, and *The Claremont Review of Books*. He has been a Visiting Fellow in American Political Thought at The Heritage Foundation.

He is a political science professor at Boise State University. He earned his Ph.D from Loyola University, Chicago. He has five children and lives with his wife, Amy, in Meridian, Idaho.



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Scott Yenor

## NOT ENOUGH GOOD MEN

*Gender Integration and the Collapse  
of the Virginia Military Institute*

American men face a mounting crisis. They lag behind women in education, are edged out of careers, and see their distinct needs dismissed as illegitimate. Our civil-rights framework forbids even acknowledging the problem, insisting on "gender-neutral" remedies that deny natural difference. *United States v. Virginia* hastened the demolition of single-sex institutions like the Virginia Military Institute. Justice Ginsburg declared distinctions between men and women mere prejudice, predicting VMI would scarcely change. The opposite has occurred: standards diluted, discipline softened, honor diminished. To remedy this, states must overturn the 1996 Supreme Court ruling and once again affirm masculine honor as a civic good.



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