

Statement in Opposition to a Proposed Modification of the Phase
IV Detailed Planned Development that would allow the Arizona
College of Nursing to establish operations in the city of Milwaukee

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Committee for Equity in Nursing Education

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The Committee for Equity in Nursing Education, a diverse coalition of 11 Milwaukee area organizations urges you to reject the Arizona College of Nursing's (AZCN) request for a zoning change at 9000 W. Chester Street that is required for it to establish operations in Milwaukee.

The Committee with strong roots in Milwaukee Black and Latino communities opposes the change because AZCN's abysmal record of student "success" makes it clear that it would have "an adverse impact on... the community's welfare."

The Committee is composed of the following organizations: Milwaukee Chapters of the National Association of Black Nurses and the National Association of the Hispanic Nurses, the NAACP, the Milwaukee Grassroots Network for Health Equity, AFT Local 212, the Wisconsin Federation of Nurses and Healthcare Professionals, the Milwaukee Wellness Collective, SEIU Wisconsin, Citizen Action, Souls to the Polls, and QDC Research & Policy Consulting Corporation LLC.

The Committee opposes the change because AZCN's record makes it clear that it would "adversely impact ... the community's welfare."

The AZCN acknowledges that it has a terrible drop-out rate of 60%.ⁱ That alone should be disqualifying.

According to 2019 federal student loan data, 21% of students at the college's Tempe, Arizona, location defaulted on their student loans after three years.

Neither are surprising given the AZCN's extremely high tuition of \$28,000 to \$37,000 a year, which doesn't include books, scrubs, supplies, transportation, room, board, or other costs of attendance.

A study of for-profit colleges like the AZCN conducted by the Health Education, Labor, and Pensions Committee of the United States Senate concluded, “The vast majority of the students left with student loan debt that may follow them throughout their lives, and can create a financial burden that is extremely difficult, and sometimes impossible, to escape.”ⁱⁱ

Not surprisingly, AZCN is subject to a lawsuit similar to ones filed against other predatory colleges such as Everest College, Sanford Brown, Kaplan and ITT Tech. All preyed on students from Milwaukee low-income communities.

AZCN students in Dallas accused the company of fraud only four years after its campus opened. Their claims are familiar: students were overcharged for courses, not informed that their credits wouldn’t transfer, and discouraged from completing their studies successfully. ⁱⁱⁱ

Predatory schools like the AZCN target black and brown students which explains why, despite reporting to the state’s board of nursing that they would locate in the western suburbs, they are seeking a city of Milwaukee location.

According to the Federal Reserve Board, Black and Hispanic individuals are three times more likely to attend a for-profit college than white individuals. In 2017 alone, students of color made up over half of the attendees at all for-profit colleges. In comparison, public and nonprofit colleges enrolled twice as many white students as students of color.^{iv}

A recent study conducted by the Student Borrower Protection Center entitled *Mapping Exploitation: Examining For-Profit Colleges as Financial Predators in Black and Latino Communities* reported that, “In Milwaukee, the ten percent of zip codes with the densest Latino populations have 9 times more for-profit colleges than the ten

percent of zip codes with the densest white populations. In particular, the areas with the densest Latino populations have nine for-profit colleges, while the whitest communities have only one for-profit college. Meanwhile, the ten percent of zip codes with the densest Black populations have four for-profit colleges.”^v

The AZCN like other for-profit colleges such as Everest and Sanford Brown view the city’s low-income Black and Latino communities as nothing more than a lucrative market. And like those defunct organizations their high drop out and federal loan default rates make it abundantly clear that rather than create a pipeline of new nurses, they will drive many poor students even deeper in debt.

Clinical sites represent another problem. In order to be licensed, nursing students must work under supervision in hospitals or clinics. Milwaukee currently has a range of public and private colleges that are already challenged to find enough clinical placements for their nursing students. All of the AZCN clinical sites included the warning that “This agency intends to offer clinical placement(s) to the extent that we have capacity at the time of the request....”

Even more disturbing, 18 of the 29 clinical sites that the AZCN provided to Wisconsin’s Board of Nursing are located outside the city. 11 are not even in Milwaukee County. We know from our experience and because of the spatial mismatch cited by urban scholars that low-income, students of color, the students the AZCN recruits, are likely to lack access to reliable transportation. Clinicals in Pewaukee, Janesville, Watertown, and Oconomowoc are simply inaccessible. It is no wonder that the AZCN has a 60% drop-out rate.^{vi}

Organizations like the AZCN are schools in name only. They are businesses that prioritize recruitment and marketing over quality education. According to the Senate’s report, “Documents indicate that the recruiting process at for-profit education companies is

essentially a sales process. Investors' demand for revenue growth is satisfied by enrolling a steady stream of new student enrollees or "starts. During the period examined, at many companies the performance of each person in the admissions chain, from CEO to newly-hired junior recruiters, was rated at least in part based on the number of students enrolled."

A recent report from the Aspen Institute report entitled *Worse off than When They Enrolled: The Consequence of For-Profit Colleges for People of Color* concluded:

Attending a for-profit college can contribute to long-term disparities in financial well-being by race and ethnicity. Almost 60 percent of black students who attended a for-profit college in 2004 defaulted on student loans by 2016, compared to 36 percent of white students. For black students who do not finish their degree, this figure rises to almost 70 percent. Given that the six-year retention rate at for-profit colleges is only 26 percent, we can assume that more students of color are struggling with loan burdens than not. Some students who graduate from a for-profit college have found that their newly-obtained credentials are not in demand. Unreliable and misleading job placement rates make it hard for students to accurately determine the risks prior to enrollment. These problems are exacerbated for people of color, who are more likely to be impacted by aggressive recruitment, high debt loads, and poor job placement, resulting in a greater risk of financial hardship and disproportionate harm.

Milwaukee is one of the nation's poorest cities with a 25% poverty rate. Black people account for 43.2% of Milwaukee's poor. The AZCN threatens to exacerbate this already unacceptable level of impoverishment.

The city of Milwaukee recently wrote in MKE Elevate, “Poor health and poverty rates are inextricably linked,” citing the city’s extremely high rates of Black infant mortality and low Black mortality rates. It concluded, “These disparities are by design and have come as a result of poverty, education and housing segregation....” It concluded by asking, “Is there the political will to address this problem?”^{vii}

Research has demonstrated that predatory colleges like the AZCN with high drop out and federal loan default rates contribute to Milwaukee’s racial disparities and poverty. It is clear that the AZCN would have an adverse impact of public health and welfare.

The Department of City Development wrote in an email addressing public opposition to the Arizona College of Nursing, *“We will review any information submitted to the Department and CPC during the process of reviewing this proposed GPD amendment to determine if this proposal may adversely impact public health, safety, and welfare prior to making our final recommendation to CPC and the Common Council.”*

It is clear that the AZCN would have an adverse impact of public health and welfare.

To paraphrase the city’s own question-Is there the political will to address this threat?

ⁱⁱ Milwaukee Journal Sentinel, Jan. 5, 2024. <https://www.jsonline.com/story/news/education/2024/01/05/for-profit-colleges-plans-for-milwaukee-touch-a-nerve-for-nurses-educators/72100188007/>

ⁱⁱ United States Senate, For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success, July 30, 2012. https://www.help.senate.gov/imo/media/for_profit_report/PartI.pdf

ⁱⁱⁱ Lawsuit, October 10, 2022. C:\Users\rosen\Documents\arizona college of nursing\lawsuit.pdf

^{iv} Aspen Institute, March 19, 2019. Worse Off Than When They Enrolled: The Consequence of For-Profit Colleges for People of Color. <https://www.aspeninstitute.org/blog-posts/worse-off-than-when-they-enrolled-the-consequence-of-for-profit-colleges-for-people-of-color/>

^v Student Borrower Protection Center, Mapping Exploitation, July 2021. <https://protectborrowers.org/wp-content/uploads/2021/07/SBPC-Mapping-Exploitation-Report.pdf>

^{vi} Board of Nursing, Madison, WI. Minutes, April 14, 2022. <https://dsps.wi.gov/Documents/BoardCouncils/NUR/20220414NUROpenSession.pdf>

^{vii} MKE Elevate Issue Brief: Racism and Health Equity, City of Milwaukee Health Department, February 2023. <https://city.milwaukee.gov/ImageLibrary/Groups/healthAuthors/MKE-Elevate/Racismandhealthequity.pdf>