



American Federation of Teachers, Local 212

Milwaukee Area Technical College
Affiliated with AFT, AFT-WI, AFL-CIO & MALC

January 10, 2024

Members of the City Plan Commission,

The American Federation of Teachers Local 212 representing approximately 1500 faculty, professional staff, counselors and Milwaukee Public Television's engineers and production specialists at the Milwaukee Area Technical College, urges the Milwaukee Plan Commission to reject the Arizona College of Nursing's (AZCN) request for the zoning change needed to begin operating in Milwaukee. Allowing the AZCN to operate in the city would "have an adverse impact [on]...public welfare" in the city.

Milwaukee and its Black and Latinx students have been down this road before with disastrous results.

In 2010 then AFT Local 212 President, Dr. Michael Rosen, Alderwoman Milele Coggs, and Hillside Family Resource Center Director Ann Wilson, urged the Board of Zoning Appeals to reject a zoning change sought by Everest College, a subsidiary of the infamous and predatory Corinthian College. They cited Everest's exorbitant costs, poor graduation rates, and extremely high federal loan default rates.

Like the Arizona College of Nursing, Corinthian College had been sued for fraudulent practices by its students. It settled the suit for almost \$7 million. Despite the Board of Zoning Appeals chairwoman saying there was "disturbing evidence" of Everest's predatory practices, Everest's request was approved. The results were as dismal as they were predictable.

As the Milwaukee Journal reported only last year,

"Nearly a decade since the school shut its doors, many former Everest students are struggling to rebuild their lives. Some are still trying to earn a degree; others are on the cusp of filing for bankruptcy and many are plagued by credit scores that make securing a mortgage or auto loan all but impossible.

The decisions they made to try to lift themselves out of poverty by enrolling at Everest have instead left many deeply embedded in it." <https://www.jsonline.com/story/news/education/2022/08/11/decade-after-everest-college-closed-milwaukee-students-struggle/10062688002/>

Everest College wasn't an exception. Local 212 also urged the Milwaukee Economic Development Commission in April, 2010 to deny the Gardner Group LLC's request for federal New Market Tax Credits for its Dye House project because its anchor tenet, the Art Institute of Milwaukee, had a record of deceiving and manipulating students into signing up for courses and programs they could not afford, that did not lead to gainful employment, and whose credits did not transfer to other colleges and universities. In short, the Art Institute of Milwaukee was noted for unscrupulous business practices and its checkered legal record.

These concerns were also ignored. The New Market Tax Credits were secured, but the Art Institute closed within three years of opening leaving its students in a lurch.

ITT Tech's Milwaukee area campus replicated these disastrous results, finally closing in 2016. It had also been the subject of several state and federal investigations and lawsuits that alleged fraud, harassment as an enrollment tactic, and predatory lending. Students were abandoned, left with credits that didn't transfer and with huge debts.

Like Everest, the Art Institute, and ITT Tech, the AZCN has extremely high drop-out rates (60%), exorbitant tuition which does not include books, scrubs, medical equipment, transportation, housing or food, and a 21% federal loan default rate. It also has very low passing rates for the state nursing board licensing exam.

AZCN, like all for-profit colleges, targets low-income Black and Latinx students. It manipulates their desire to improve their lives with misleading marketing information. The predictable results are high drop-out and default rates that leave students poorer and more in debt than when they enrolled.

Finally, Milwaukee is home to several successful and long-established nursing and health occupations programs. These programs require students to participate in clinical rotations at hospitals and clinics under the supervision of an experienced clinician. There is currently a shortage of nursing clinical placements which even the Arizona College of Nursing acknowledged in its application for a Madison location when it wrote, "The leadership at AZCN understands that clinical sites are finite and finding clinical learning opportunities can be challenging."

If the AZCN is allowed to operate in the city, it will have to secure clinical spaces which may come at the expense of the existing successful programs. Moreover, many of the clinical sites it lists on its Board of Nursing application are in distant suburbs and exurbs like West Bend and Pewaukee. For the students this institution will recruit, low-income Milwaukee residents who lack reliable transportation, these clinical sites might as well be on Mars. With practices such as these, it is no wonder that the AZCN has a 60% drop-out rate.

For these reasons, the American Federation of Teachers Local 212 urges you to deny the Arizona College of Nursing's request for a zoning change because its operation would have an adverse impact on the psychosocial and financial welfare of Milwaukee's poorest students. And, by driving them deeply into debt without a degree facilitating their upward mobility and the ability to serve area residents as healthcare professionals, its operation would have an adverse impact on the entire city.

Thank you for your attention to this request.

Sincerely,

A handwritten signature in black ink that reads "Lisa Conley". The signature is written in a cursive, flowing style.

Lisa K Conley, PhD
President, AFT Local 212