



March 12, 2024

To: City of Milwaukee Zoning Neighborhood and Development Committee Chairman Alderman Michael Murphy, Vice Chair Bob Bauman, members Jonathan Brostoff, Jocasta Zamarripa and Russell Stamper

cc: President of the Common Council Jose Perez
Cavalier Johnson, Milwaukee Mayor
Tony Evers, Wisconsin Governor
Wisconsin Board of Nursing
Secretary, Wisconsin Department of Safety and Professional Services (DPS)
Cleo Krejci, Milwaukee Journal Sentinel

We recently learned that Arizona College of Nursing (AZCN) is seeking a zoning change in order to establish a campus at 9000 West Chester Street in Milwaukee. As the regional coalition of all seventeen 2- and 4- year, public and private nonprofit colleges and universities in the Southeastern seven counties of Wisconsin, the Higher Education Regional Alliance (HERA) urges the Milwaukee Common Council to reject AZCN's request.

While HERA and our region's healthcare employers recognize the need for more Nurse graduates, adding a new school is solving the wrong problem. We do not need greater capacity, as the current Nursing and Health Sciences educators have sufficient capacity to increase Nursing and health related graduates. The limiting factor is availability of staffing for sufficient clinical placements in the region.

As a highly regulated profession, nursing requires students to complete a specified number of clinical hours under the guidance of Masters' degree qualified faculty. The current nursing shortage presents a conundrum for medical facilities which must decide between the long-term benefit of allocating staff time to "teaching" and the immediate need for those individuals to fulfill current staff demand. To address the critical nursing shortages, HERA institutions are collaborating to expand available clinical placements.

Despite challenges, over the recent ten year period (2013-2022), HERA institutions awarded 71,269 certificates or Associate, Bachelor, Masters and Doctorate degrees in the Health Sciences field. (<https://www.herawisconsin.org/degree-production-project/>)

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HERA Vice Chair
Cindy Gnadinger, Ph.D.
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More specifically, this included 16,524 certificates/degrees granted preparing Practical Nurses, Vocational Nurses and Nursing Assistants and 18,627 certificates/degrees preparing Registered Nurses Nursing Administration and Nursing Research. Together, the 35,151 Nursing specific categories represent 49% of region's Health Science awards.

In summary, the problem is NOT a shortage of Nurse education programs, but limitations in availability of clinical placements.

We applaud the City of Milwaukee for recognizing racial disparities as public health crisis and taking steps to address inequities. Similarly, **HERA's goal for its education programs is to increase student success and eliminate racial and economic equity gaps.** HERA leadership is dedicated to accelerating student success efforts, and to holding ourselves accountable through sharing our progress. Between 2019 and 2023, HERA intuitions combined graduation rates across racial and economic groups are up 4% for students who graduated in 100% of time and up 3% for students who graduated in 150% of time. (<https://www.herawisconsin.org/m7-region-data-dashboard/>)

HERA remains student focused, while also providing the talent for our region. In contrast, we ask you to consider the expected outcomes from a "for-profit" institution, should such an entity be granted an approval to open a west-side Milwaukee program. According to a [U.S. Senate report](#), many for-profit colleges make decisions that prioritize their bottom line, even when those decisions limit their students' opportunities for academic success. Please note, AZCN was placed on probation (3-years) by the [Arizona State Board of Nursing](#) for decisions that were made at the expense of its students.

The owners, operators and boards of a for-profit college are expected to maximize profits and return that benefit to investors. When we consider the source of revenue to provide the needed profit, we expect that Milwaukee's low income students who pay tuition through grants and loans would ultimately bear this burden. We don't need to passively wait for a disaster. We can expect that the violations that prompted the probation status from the Arizona Board of Nursing will be egregiously repeated in Milwaukee.

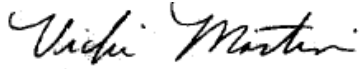
We remember a similar disaster from a decade ago, with the opening in 2010 and abrupt closure in 2013 of Everest College, as reported by the [Milwaukee Journal Sentinel](#) resulted in investors being repaid, while Milwaukee students were burdened with debt and no degree. In 2022, the U.S. Education Department provided some relief for borrowers by discharging \$36 million for 3,320 Wisconsin borrowers in its \$5.8 million settlement with Corinthian Colleges, the now-defunct for-profit chain that included Everest College. Recognizing this pattern, David Whitman, in his [commentary](#) for "The Century Foundation" asserts that for-profit colleges "are far more likely than nonprofit and public colleges and universities to engage in boiler-room recruiting tactics, fraud, deceptive advertising and misrepresentation, and are much more likely to suffer disastrous abrupt, mid-semester closures".

In closing, the Presidents and Chancellors of the Higher Education Regional Alliance, urge the Milwaukee Common Council to reject Arizona College of Nursing's request for a zoning change.

Sincerely,

HERA Chair

Vicki J. Martin, Ph.D, President
Milwaukee Area Technical College

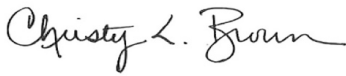


HERA Vice Chair

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Carroll University



Christy Brown, President
Alverno College



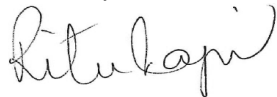
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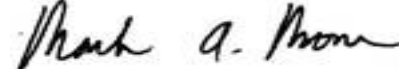


Jeff Morin, Ph.D, President
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HERA Founding Chair

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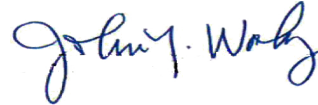


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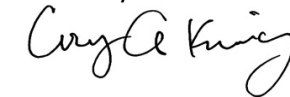
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