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To: the Milwaukee Plan Commission

The Wisconsin Federation of Nurses and Healthcare Professionals urges the Milwaukee Plan Commission to reject the Arizona College of Nursing's request for a GPD amendment. We cannot let the urgency of a staffing crisis in healthcare allow us to open our collective arms to an organization as troubling as the Arizona College of Nursing.

The American Nurses Association Code of ethics reads: "The profession of nursing, collectively through its professional organizations, must articulate nursing values, maintain the integrity of the profession, and integrate principles of social justice into nursing and health policy."

The Arizona College of Nursing, with its 60% drop out rate and its 21% federal loan default rate, lacks the integrity and commitment to social justice that is central to the nursing profession's mission.

The Arizona College of Nursing has been sued for fraud by 19 students in Dallas, Texas. This is reminiscent of Milwaukee's experience with the controversial and now defunct Everest College. It's parent company Corinthian was sued for fraud in California and settled for almost \$7 million before it even established its operations. It's controversial 1311 N 6th Street campus closed after only a year and half of operations. 1,000 students were abandoned with no degrees, non-transferrable credits, huge federal loan debts and an employment rate of less than 5%.

The Student Borrower Protection Center, which advocates for borrowers' rights, reports that "for-profit schools disproportionately plant themselves in minority communities and engage in predatory practices, leaving those students worse off than when they started."

In a report entitled *Mapping Exploitation: Examining For-Profit Colleges as Predators in Communities of Color,* the study analyzed how these colleges inname only cluster in minority communities by examining Midwestern cities. It concluded, "The geography of for-profit institutions is no coincidence, and is indicative of reverse redlining, the practice of offering unfair or predatory terms to entire communities and protected classes; in this case, for-profits target their suboptimal products and services to communities with the largest share of Black and Latino residents." (https://protectborrowers.org/wp-content/uploads/2021/07/SBPC-Mapping-Exploitation-Report.pdf)

Milwaukee has been burned by predatory colleges such as ITT Tech, the Art Institute, Sanford Brown and Kaplan in the past. Their practices have left thousands of our young people, many of whom are single mothers, with useless credits, jobless, and huge debts. Rather than help students escape poverty, they help create it, making our city and its residents poorer and more indebted.

Burdening new nurses with debt will only harm the long-term sustainability of healthcare as a profession. The real solution to this crisis is taking a pointed eye towards improving standards for those working in healthcare, which will require the courage to demand better from our institutions – colleges and healthcare corporations alike.

Milwaukee has had enough negative experience with for-profit colleges to deny the AZCN application. The Texas lawsuit is a red flag! The AZCN would be harmful to the public. It's track record conflicts with the nursing profession's mission and the needs of our city. Their request for a zoning change should be denied.

Sincerely,

Connie Smith

President, WFNHP Local 5000