



ARIZONA COLLEGE of Nursing[®]

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March 7, 2024

To Whom It May Concern:

My call to care came at a young age. The nurses who cared for me throughout my four surgeries in just a five year span made a profound impact on my life, and I knew that I wanted to do the same for other children. From that point on, I was focused on becoming a nurse.

My educational journey towards nursing hit an unanticipated barrier when it came to gaining admittance into a nursing program in my home state of Washington. I spent over a year submitting applications only to be met with disappointing outcomes. At the end of that year, I recognized that I needed to explore additional options to achieve my goal of a Bachelor of Nursing (BSN) degree. After researching additional opportunities, I found Arizona College of Nursing (AZCN), gained acceptance into the program, and moved to Phoenix, Arizona to begin classes.

I am proud to report that I successfully earned my BSN from AZCN in 2020 at the Tempe campus. I was supported in the rigorous program by faculty members like Shannon Olson, who I often call my nursing school angel. While it was not easy, I had the support that I needed with AZCN to pass the NCLEX and earn a spot as a nurse in the NICU with Phoenix Children's hospital.

The support I received from Mrs. Olson while I was a student at AZCN also inspired an additional calling in my career – to become an educator myself. While working at Phoenix Children's hospital, I served as a Preceptor to help new and future nurses bridge the gap between theoretical learning and clinical practice. I now have earned my Masters in Nursing Education, and I am thrilled to report that I am continuing to help nurses enter the profession by taking a full-time faculty role back where all my nursing dreams began to take life – Arizona College of Nursing - under the now Dean of Nursing, Shannon Olson.

Thank you,

A handwritten signature in black ink, appearing to read 'Brooke Kalamen', with a stylized, cursive script.

Brooke Kalamen, MSN-Ed, RN



Corporate

Human Resources
2901 N. Central Ave. #160
Phoenix, AZ 85012
602.747.4000
bannerhealth.com

March 12, 2024

To Whom It May Concern:

My name is Dr. Noelle Trinder, DNP, RN, and I serve as the Senior Director, Healthcare Careers with Banner Health.

Banner Health has partnered Arizona College of Nursing since 2020 to help develop the next generation of healthcare workers. Together, we are addressing the growing need for new skilled nurses and higher education institutes to help get them there.

Through our partnership, Banner has come to know the AZCN team as thoughtful partners and members of the community, working with our team on clinical strategies to meet the needs of its students, our nurses, and our patients. Their team is always open to feedback, responsive with their solutions, and investing in ways to bridge the gap between academic experience and clinical practice.

The Banner team has come to know the students of AZCN's program as well-prepared as they progress through their courses and clinical experience. AZCN's impressive SIM labs, curriculum, and instructors set their students up for success in the classroom and beyond.

Knowing the quality of AZCN's program, the nursing team at Banner is comprised more and more of AZCN graduates. We proudly hire many of the students who participate in clinicals with us, and they have proven to be wonderful additions to the team. With multiple graduations throughout the year, AZCN also helps Banner to bring on additional nurses throughout the year to meet our staffing needs.

We look forward to continuing our partnership with AZCN and encourage any community and healthcare system to welcome them as well.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Trinder", with a stylized flourish at the end.

Dr. Noelle Trinder, DNP, RN
Banner Health
Sr. Director, Healthcare Careers

WEST COAST CAPITAL PARTNERS

A Real Estate Investment Company

March 8, 2024

Re: Arizona College of Nursing

To Whom It May Concern:

We hope this letter finds you well. We are writing to express our appreciation for the positive impact that Arizona College of Nursing has had on both our community and our building. Since AZCN signed on to join Williams Centre in July of 2020, they've been a pleasure to work with and have been a stellar example of the kind of tenant we like to have at our projects. The presence of AZCN has brought a sense of vitality and purpose to our building, fostering an environment of learning and collaboration that benefits everyone involved.

One of the most commendable aspects of AZCN is the exceptional quality of the individuals associated with the institution. From the dedicated students who demonstrate a genuine enthusiasm for learning to the highly professional administrators who go above and beyond to ensure the success of each student, it is evident that AZCN attracts and nurtures individuals of the highest caliber. The passion, dedication, and professionalism exhibited by everyone at AZCN reflect positively not only on them but also on our building as a whole. From working with the administrative team through construction and occupancy, to now having AZCN operating in the project, they've shown professionalism and courtesy every step of the way.

We are proud to have AZCN as a tenant and partner, and we look forward to continuing our collaboration for many years to come. Please feel free to reach out to me with any questions.

Sincerely,



Scott Douglas

25500 HAWTHORNE BOULEVARD, SUITE 2250

TORRANCE, CALIFORNIA 90505

T: 310-698-5310



March 7, 2024

To Whom It May Concern:

Since they first signed a lease in 2020, Arizona College of Nursing has been a positive partner and tenant for the Centra Point development in Las Vegas, Nevada.

As a mixed space use, including office, retail and dining space, Centra Point considers the addition of Arizona College of Nursing as a vital part of our space. They bring community between tenants as an institution of higher education, and their tenancy has been helpful in increasing our occupancy. They have spurred the ability for our space to provide additional services, such as café, fitness, and common area upgrades. I consider them essential in building the portfolio.

In my role, I appreciate that we have had the benefit of regulatory certainty so that we can continue to develop spaces that host great tenants like Arizona College of Nursing. Since their initial build, they have enhanced and expanded their space in our building, and attracted students to address our region's great need for nurses.

I am proud to offer my supportive testimony for Arizona College of Nursing to anyone considering their future tenancy.

Thank you,

A handwritten signature in blue ink that reads "Shelly Caspers". The signature is fluid and cursive, with the first name "Shelly" and last name "Caspers" clearly distinguishable.

Shelly Caspers
Senior Property Manager
702-896-6582



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MILWAUKEE CAMPUS BACKGROUND SUMMARY

OVERVIEW

Since 2008, educational institutions have occupied spaces within the Honey Creek development, including ComputerTraining.com, Strayer University, and Lakeland College. That space is now being updated to host Arizona College of Nursing, an institute of higher education with over 30 years of experience supporting students.

We ask that the minor modification ordinance be considered as Milwaukee Deputy City Attorney, Todd Farris, advised to the City Plan Commission on February 12, 2024 'in a commonsense manner,' and consistently with the precedent set by previous tenants of the space.

When fully developed, the occupancy by Arizona College of Nursing will contribute to the tax base, bringing 47 jobs, collectively paying over \$4M annually, injecting \$1M each year into the local economy, and graduating 100+ skilled nurses on an annual basis into the Milwaukee region, helping to address the nursing shortage noted by Governor Evers.

KEY DATES

1989 – Honey Creek Creation

City of Milwaukee approves construction under a General Planned Development (GPD) Agreement, each with its own Detailed Planned Development Agreement (DPD).

2002 – Honey Creek Phase IV Development

City of Milwaukee approves the construction of 9000 W. Chester Street, known as Phase IV, which allowed for Correspondence Schools, Data Processing Schools, and Business and Secretarial Schools.

2002 – Zoning Code Change

Zoning Codes are overhauled, and GPDs and DPDs previously permitted no longer exist as noted. The new, closest classifications include School, Personal Instruction, College, and University.

2008 – ComputerTraining.com

City of Milwaukee issues a Certificate of Occupancy for ComputerTraining.com, approving under the School, Specialty/Personal Instruction use, in the Phase III building.

2010 – Strayer University

City of Milwaukee issues a Certificate of Occupancy for Strayer University, approving under the College or University (offices and classroom) use, in the Phase IV building.

2015 – Lakeland College

City of Milwaukee issues a Certificate of Occupancy for Lakeland College, approving under the College or University (commercial general office space) use, in the Phase IV building.

2023 – Arizona College of Nursing

- April: City of Milwaukee issues a Commercial Alteration Permit for Arizona College of Nursing and Brian Biernat issued a Plan Approval Letter relating to the permit.
- October: Brian Dean from the City notifies Campbell Construction that 'College' is not a permitted use under the GPD or DPD and Kristen Connolly from the City reaffirms. Minor modifications are requested.

Arizona College of Nursing (AZCN) Response Summary

<p>AZCN self-reports a 60% drop out rate.</p>	<p>This accusation is a misrepresentation of data and taken out of context from a presentation regarding the proactive support systems we have in place to help our students succeed. The actual data was in reference to 60% of students who did not complete the program dropping out due to personal reasons (as shown in the image to the right.) This does not mean 60% of students dropped out. As reported by the Integrated Postsecondary Education Data System (IPEDS), the AZCN 2022 graduation rate is 68%, which is higher than 13 out of 15 Milwaukee area nursing programs.</p> <div data-bbox="1273 569 1562 806"> <p>There are 3 vulnerable points of attrition in the student life cycle:</p> <ul style="list-style-type: none"> 75% of General Education student drops are either within 60 days of the program start or when students have at least 1 failing grade. 35% are 60+ days with at least one failing Arizona College of Nursing grade. 75% of Core drops occur in Semesters 5 & 6. <p>Over 60% of Arizona College of Nursing students drop out for "personal reasons". Depression, abusive relationships, homelessness, pregnancy, work conflict, financial hardship, illness and death.</p> </div>
<p>AZCN has a student default rate on federal financial aid loans of 21%.</p>	<p>The most recently reported AZCN default rate, which represents the FY19 cohort, is 2%, though recent default rates for any institution are skewed by the repayment pause put into place in 2020. Even in prior years, AZCN's rates were lower than other Milwaukee schools, such as Milwaukee Area Technical College and Bryant & Stratton, which serve a similar demographic of students.</p> <p>More importantly, this data point is being used as a reflection of the quality of the AZCN program, though it is not an appropriate means to do so. Student NCLEX rates (the exam to become an RN) at AZCN – 89.74% for 2023, which is in line with Wisconsin's 88.39% rate - show the impact and quality of the AZCN curriculum and support, especially as AZCN offers opportunities for many non-traditional students.</p>
<p>AZCN has been sued for fraud by 19 former students at its Dallas, Texas business.</p>	<p>While AZCN cannot comment on open legal matters, this references a series of actions taken by a group of students in Texas. As a part of those actions, accreditation and regulatory agencies were also contacted with similar concerns. Each of those agencies has since investigated and taken no negative action against AZCN. We look forward to this suit having a similar outcome.</p>
<p>800 Milwaukee citizens and leaders have signed a petition opposing AZCN as this predatory business does not serve the interests of the people in Milwaukee.</p>	<p>AZCN continues to focus on fostering relationships within the community so that we can address the nursing shortage in Wisconsin and the need for additional educational opportunities together.</p> <p>AZCN hopes to build upon our long-standing partnerships with national and local organizations as we join the Milwaukee region. This includes associations such as the National Black Nurses Association (NBNA) and the National Association of Hispanic Nurses (NAHN), for which we fund over \$250k in annual scholarships, cover the cost for student memberships, and have enjoyed years of mutual support.</p>

Arizona College of Nursing

Response Summary Cont.

<p>AZCN entered into a consent agreement including 3 years of probation with the State of Arizona that outlined numerous student and faculty complaints about its program quality at the college's Tempe, Arizona business.</p>	<p>Over two years ago in the Fall of 2021, the AZCN Tempe campus experienced operating challenges, leading to student complaints. The issues were addressed at that time, and the campus is progressing well.</p> <p>Even during the period of time in which it experienced operating issues, the campus maintained high NCLEX pass rates, including 97.33% in 2020, 91.95% in 2021, 92.43% in 2022, and 92.76% in 2023.</p>
<p>Clinical instruction at existing healthcare facilities is required for nursing degrees. Yet, most of the potential clinical sites claimed by AZCN -- 18 of the 29 (62%) -- are not in the City of Milwaukee. 11 of the sites claimed (38%) are not even in Milwaukee County, while two sites are ridiculously far away in Janesville and Watertown.</p>	<p>For AZCN planned clinical sites in Milwaukee, the average distance from the AZCN campus is 18 miles, with 42% of locations within 10 miles and only 10% of locations more than 35 miles away.</p> <p>AZCN recognizes that opportunities to advance in nursing are often made especially difficult for non-traditional students based on clinical schedules and locations. As a part of AZCN programs, many clinical opportunities are provided to meet the unique needs of as many students as possible, such as evening + weekend shifts, which are often not leveraged by other programs but provide additional flexibility for both traditional and non-traditional students. Furthermore, AZCN has Student Achievement Coaches who support students by connecting them to a host of academic and non-academic resources to help them manage any challenge that might arise in their academic and clinical success.</p>
<p>Despite gaining initial approval, AZCN is now being investigated by Wisconsin's Education Approval Board.</p>	<p>Two individuals who are opposed to the zoning approval also submitted the same complaints to the WEA Board. The Wisconsin Education Approval (WEA) Board is required to investigate all complaints, and are doing so as a part of their standard process. AZCN is fully cooperating with the Board, and we look forward to continuing forward with their ongoing approval.</p>
<p>AZCN's Board of Directors is dominated by businessmen, not education or healthcare professionals. AZCN exists to vacuum as many federal student loan dollars as it can, and AZCN does that regardless of whether its victims earn degrees or get jobs.</p>	<p>The Board and AZCN leadership team, which includes many doctoral- and Masters-prepared nurses, holds itself accountable to excelling in measures of student achievement, including NCLEX pass rates and job placement. The positive student outcomes of AZCN programs reflect those efforts, and AZCN looks forward to driving the same results for students in Milwaukee.</p>
<p>As a result of these facts, it should be clear that approving this predatory education business to exploit citizens of Milwaukee will have an adverse impact on the community's health and welfare.</p>	<p>As Governor Evers recently shared in his Task Force on the Healthcare Workforce announcement, 'Wisconsin faces a potential deficit of 20,000 nurses by 2040.' This projected shortage in the workforce is a known threat to the community's health and welfare, and AZCN looks forward to providing additional, quality educational opportunities to meet this growing need.</p>

Arizona College of Nursing

Response Summary Cont.

AZCN is Harmful for Milwaukee. AZCN is making the same misleading claims that other for-profit colleges like Everest, Sanford Brown, Kaplan and ITT Tech have made. These predatory businesses have now closed their Milwaukee campuses, leaving thousands of Milwaukee low-income students worse off - poorer and more deeply in debt after being lured into these predatory program. We cannot contribute to repeating these harms as the community ill served by such harmful practices.

Unlike other for-profits that have not delivered on their promises to the Milwaukee community, AZCN has a 30 year history without closures. Our Milwaukee campus will focus solely on nursing, providing a 3 year path to a Bachelor of Nursing (BSN) degree with our curriculum and student support system which have a long track record of driving strong student outcomes.

AZCN does not serve the Milwaukee Community. On page 2 of the Zoning Report for File # 231146 presented to the CPC, under the heading "Consistency of Area Plan", Department of City Development staff reports the West Side Area Plan policies call for you to "support higher education facilities that serve the local and outlying population." Think about the meaning of SERVE. The verb "Serve" is not to "Exploit," "Deceive," nor "Defraud the local population." AZCN will not serve the community nor does AZCN have the appropriate support or interest from the community in being served. The community rejects AZCN.

AZCN is committed to serving our past, present, and future students as well as the communities in which we operate. AZCN serves an important need, addressing the potential deficit of nurses noted by Governor Evers, as well as providing additional educational paths for students to enter the healthcare field.

Many students who wish to pursue their nursing career are met with barriers – from program timeline, flexibility, admissions capacity, or resources. AZCN serves our students by fulfilling an important need by creating additional options for educational and career access with:

- A 3-year program design
- Hybrid courses for GenEd and evening/weekend clinicals to create flexibility to support non-traditional students
- Additional educational opportunities within the community
- Comprehensive resources to support our students from enrollment to graduation

AZCN serves investors and will cause harm in Milwaukee. AZCN does not serve students. Like other predatory for-profit colleges, AZCN serves investors at the expense of students. AZCN will engage in any kind of deception of students and public servants to enrich its investors. AZCN undermines real workforce development efforts and its poor-quality leads to potential medical malpractice and poor patient outcomes.

AZCN operates on a student-centric design. We invest in support and resources to help students achieve their nursing career goals, and our NCLEX pass rates and job placements are a testament to that approach to education.



**ARIZONA
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A COMMITTED PARTNER TO MILWAUKEE'S FUTURE NURSES

ARIZONA COLLEGE OF NURSING IS AN EXPERIENCED NURSING SCHOOL
EXCLUSIVELY FOCUSED ON TEACHING FUTURE NURSES.

18

CAMPUSES

12

STATES

1991

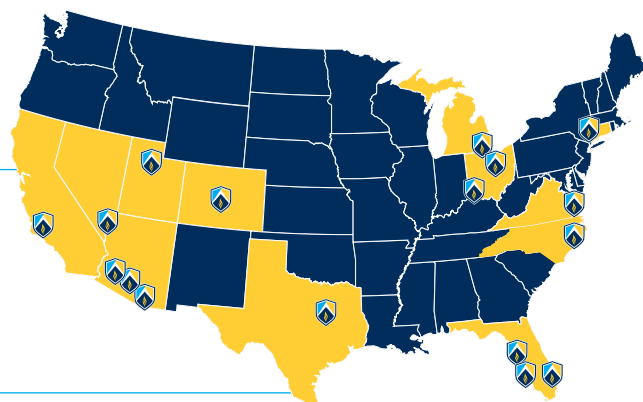
YEAR FOUNDED

**CONTINUOUS
OPERATION**

OF ALL CAMPUS
LOCATIONS

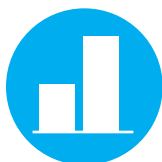
BSN DEGREE

IS SOLE
PROGRAM
OFFERED



WISCONSIN'S NURSING SHORTAGE

Arizona College of Nursing, with its 30 years in higher education, is committed to reducing the nursing shortage by providing additional educational opportunities to future nurses in the communities we serve.



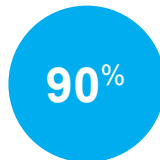
VACANCY RATES FOR
REGISTERED NURSE
POSITIONS IN WISCONSIN
MORE THAN DOUBLED FROM
2020 TO 2021*



OF OUR STUDENTS
SECURE IN-DEMAND JOBS
WHEN THEY GRADUATE



WISCONSIN FACES A
POTENTIAL **DEFICIT OF 20,000+**
NURSES BY 2040**



OF OUR STUDENTS
STAY WITHIN 100 MILES OF THEIR
CAMPUS AFTER GRADUATION

* According to a 2023 Wisconsin Health Care Workforce Report from the Wisconsin Hospital Association

** State of Wisconsin Office of the Governor, 01/23/2024, Press Release "Gov. Evers Declares 2024 the Year of the Worker"



**ARIZONA
COLLEGE**
of Nursing®

PROUD OF OUR STUDENTS' SUCCESSES

REAL WORLD EXPERIENCE

The robust academic curriculum includes career-ready training from experienced nurse educators to help students succeed in their education and career. Our future nurses learn in multiple environments including the classroom, clinical agencies, simulation and learning laboratories, and the community. Nurse educators have professional registered nurse experience and have a graduate degree credential or higher, ensuring students are learning from the best in their field.

89.74%

ARIZONA COLLEGE OF NURSING
2023 NCLEX PASS RATE

88.39%

WISCONSIN
2023 NCLEX PASS RATE

96.04%

ARIZONA COLLEGE OF NURSING
2023 Q4 PASS RATE

Arizona College of Nursing is nationally accredited by nationally respected institutions. The Bachelor of Science in Nursing (BSN) degree program at Arizona College of Nursing is accredited by the Commission on Collegiate Nursing Education. All Arizona College of Nursing and Arizona College campuses are institutionally accredited by the Accrediting Bureau of Health Education Schools (ABHES), a U.S. Department of Education-recognized national accrediting agency. In 2022, Arizona College of Nursing received the maximum CCNE reaccreditation, showcasing the quality of education our future nurses receive.

COMMITTED TO THE COMMUNITIES WE EDUCATE IN

47
LOCAL
JOBS

Brought to Milwaukee with the campus opening, collectively paying **over \$4 million annually**

\$1
MILLION
ANNUALLY

Injected into the local economy by the campus

100+
NEW NURSES

Annually graduating in Milwaukee at full campus capacity

OVER
\$250K

In annual scholarships funded by Arizona College of Nursing for NBNA and NAHN members

\$2
MILLION
INVESTED

In a gleaming new learning environment for future nurses

Arizona College of Nursing has fostered key partnerships in each community we serve, and we are dedicated to working together to help solve the nursing shortage. We have cultivated relationships with the National Association of Hispanic Nurses (NAHN) and the National Black Nurses Association's (NBNA), covering the cost of membership for our students in NBNA and NAHN as well as funding over \$250k per year in scholarships for those members.