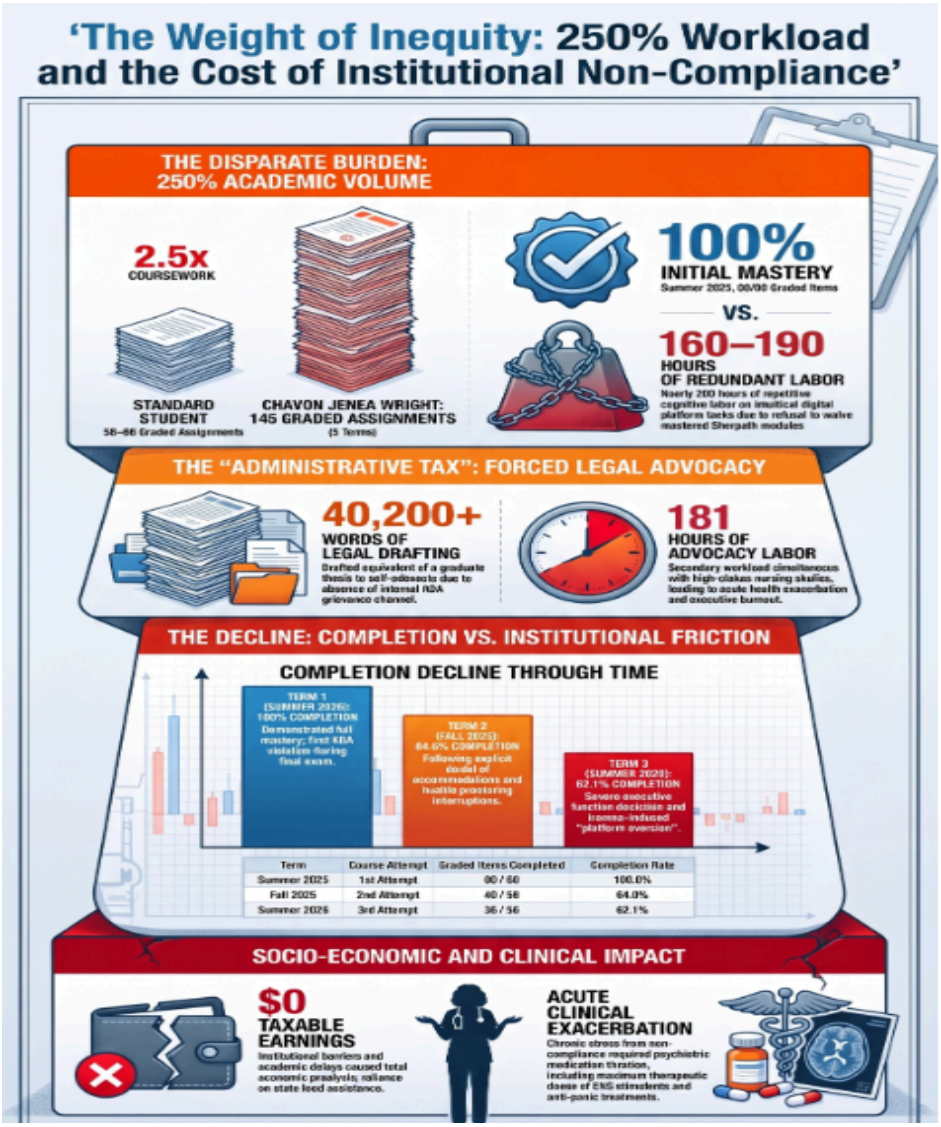
How a Wisconsin Degree Empire Built a Multi-Billion Dollar Pipeline Off the Backs of Black Women

An Empirical Examination of Predatory Credentialism, Title IV Capital Extraction, Systemic ADA Suppression, and Institutional Racism at Herzing University

Lead Investigator: Chavon Jenea Wright (Student ID: W24672939)
Program Scope: Master of Science in Nursing — Direct Entry (MSN-DE)
Institutional Subject: Herzing University (System HQ: Milwaukee, WI | Primary Degree Anchor: Madison, WI)
Federal Identifiers: IPEDS UnitID: 240392 | OPE ID: 00962100
Date of Record: September 2026

Abstract

This investigation presents a rigorous administrative, legal, and quantitative analysis of systematic disability discrimination, institutional non-compliance under Title III of the Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973, and compounded academic penalties within the Master of Science in Nursing—Direct Entry (MSN-DE) program at Herzing University. Backed by over 3,000 to 4,000 items of contemporaneous evidentiary discovery, this record documents systematic civil rights non-compliance and formal notices submitted to major accrediting bodies, including the Higher Learning Commission (HLC) and the Commission on Collegiate Nursing Education (CCNE). **Through three consecutive enrollment attempts in**



Medical-Surgical Nursing I (NSG 523)—spanning Summer 2025 (NSG523-7A), Fall 2025 (NSG523-7F), and Summer 2026 (NSG523-7)—the student was repeatedly subjected to the denial and misconfiguration of federally mandated testing accommodations during high-stakes proctored examinations.

Despite demonstrating complete curriculum mastery by achieving 100.0% completion across all 60 graded assignments in the initial term, the university imposed full tuition charges for three iterations of the course and mandated the redundant re-execution of hundreds of digital learning modules without providing interactive remediation or an operational ADA grievance channel. Contemporaneous academic logs establish that across all three terms, the student completed 145 graded assignments, representing 250.0% (2.50 times) the standard course volume required of any single-term cohort peer. This disparate burden required an estimated 160 to 190 hours of redundant platform labor and precipitated over 180 hours of formal legal drafting across multi-agency regulatory bodies (comprising over 40,200 words). The cumulative administrative friction and sensory-conditioned platform aversion caused severe executive function depletion, economic hardship ($0 taxable earnings), and acute health exacerbation. This paper provides an exhaustive, unit-by-unit audit of all graded coursework, mathematical and rhetorical juxtapositions of workload inequity, and an APA 7 reference archive documenting the legal violations and institutional liability.

Keywords: Americans with Disabilities Act, Section 504 of the Rehabilitation Act, nursing education equity, reasonable accommodation, Sherpath curriculum audit, executive function depletion, academic discrimination, graduate nursing, Herzing University, .

Institutional Analysis:
Systematic Disability Discrimination and Compounded Retake Penalties

1. Introduction and Factual Background

The integrity of graduate nursing education relies upon rigorous academic standards, ethical administration, and uncompromised compliance with federal civil rights statutes. Under Title III of the Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973, institutions of higher education receiving federal financial assistance are legally prohibited from excluding qualified individuals with disabilities from full and equal participation in educational programs. When an institution fails to configure, honor, or defend documented accommodations during high-stakes testing and subsequently forces the student to bear the academic and financial costs of that institutional failure, the university violates both statutory mandates and foundational principles of procedural due process.

The Architecture of Predatory Credentialism & Title IV Extraction

- Under Title IV of the Higher Education Act, Direct Unsubsidized Loans and Grad PLUS loans carry no statutory aggregate borrowing caps up to the institutionally determined Cost of Attendance. Herzing University leverages this chassis to extract maximum upfront federal lending from students in accelerated healthcare programs.
- IPEDS EFFY2023 Demographics: Herzing University-Madison enrolls 3,667 post-baccalaureate students. Black students represent 34.22% (n = 1,255) of the graduate body. Crucially, 1,116 of these graduate students are Black women,

comprising 88.92% of the total Black graduate population and 30.43% of total graduate enrollment.

- State Demographic Disparity: Wisconsin's state population is 80.10% White and only 6.60% Black. In stark contrast, Herzing's graduate nursing school is 34.22% Black, documenting a national online recruitment pipeline targeting out-of-state Black female healthcare workers while anchoring degree granting in Wisconsin.
- Economic Footprint Underwriting: Tuition revenue exported to Milwaukee corporate headquarters underwrites a $5.4 Billion to $7.0 Billion annual economic footprint in Wisconsin (WAICU, 2023), transferring community wealth out of Black households with zero local economic or civil rights return.
- Federal Grant Extraction: Extraction of $1,920,000 in federal HRSA Nursing Workforce Diversity grants (BHWET Award) while systematically suppressing accommodations and imposing disparate attrition hurdles on Black female trainees.
- Algorithmic Proctoring Barriers: Documented telemetry from Meazure Learning / ProctorU Guardian Browser showing 7-hour connection lockouts, arbitrary room scan denials, and proctors unlawfully overriding approved verbal processing accommodations.
- ADA Office Administrative Breakdown: Distribution of 41 conflicting accommodation letters across departments without establishing accessible, functioning testing environments.

The student, Chavon Jenea Wright (Student ID: W24672939), enrolled in the Master of

Science in Nursing—Direct Entry program at Herzing University, maintaining a 4.00 Grade Point Average in foundational coursework and earning superior academic marks across all non-disputed curriculum areas. In March 2025, formal accommodation documentation was submitted establishing necessary testing and learning adjustments for recognized medical psychological disabilities. These accommodations mandated extended testing time (up to 200%), an authorized 48-to-72-hour submission window for untimed coursework, and a private, distraction-reduced testing environment permitting verbal processing.

Notwithstanding formal institutional approval, Herzing University failed to establish an operational, timely accommodation plan for over seven months. During the Summer 2025 administration of NSG 523, the student's high-stakes final examination was conducted in a public, multi-student online environment where audio/visual warnings from proctors interrupted verbal processing, in direct violation of the student's testing plan.

In the subsequent retake term (Fall 2025), proctoring personnel via ProctorU explicitly denied approved accommodations during Exam 1, initiated repeated hostile interruptions, and refused to honor documented accommodations sent weeks prior. The root cause traces directly to the student being forcibly ejected from high-stakes testing and chastised for verbal processing—even while non-disabled peers talked aloud to each other without penalty. This hostility exacted a devastating human and clinical toll: the student was forced to apply for Social Security Disability Insurance (SSDI / Case ID: 19900645), pushed into severe destitution, left unhoused, and suffered acute depletion of mental health and executive functioning. Despite timely escalations and formal notices sent to accrediting agencies (HLC and CCNE), the university failed to provide an ADA grievance procedure, refused to waive previously mastered coursework, and billed full tuition for three separate enrollments of the exact same course.

Discovery, Record Suppression, and Grade Tampering Audit

A central dimension of institutional liability involves systematic record suppression and evidence withholding. Multiple written requests submitted by the student to Herzing University, Canvas, ProctorU / Meazure Learning, and Proctorio were either ignored or met with third-party vendor statements indicating they must obtain authorization from Herzing before releasing student session data—followed by indefinite administrative silence. These actions prevented full access to raw proctoring telemetry, chat transcripts, and audit logs.

Furthermore, evidentiary audits reveal direct grade tampering and record unreliability across university platforms. In NSG 730, Canvas system logs confirm that the final assignment was submitted on time, published, and received written faculty praise ("great job, thanks for your hard work"). Nevertheless, the institution assigned a zero and entered an F grade. In NSG 523, the institution's sole "remedy" for an eight-month ADA compliance failure was promoting the ADA coordinator who ignored the student, while forcing the student to retake the course twice. During retakes, the student was compelled to battle proctors immediately before exams to secure approved accommodations, only for proctors to repeatedly forget and revoke accommodations mid-exam.

2. Legal and Regulatory Framework: The Federal Accommodation Mandate

Under federal disability jurisprudence, reasonable accommodations are mandatory structural modifications designed to eliminate discriminatory barriers and ensure an even playing field. They are not matters of institutional generosity, discretionary leniency, or informal academic favors.

Federal regulation under 28 C.F.R. § 35.107 and 34 C.F.R. § 104.7 strictly requires that postsecondary entities establish prompt and equitable grievance procedures to resolve disability discrimination complaints. Herzing University operated in direct non-compliance with these provisions by maintaining no accessible internal remediation mechanism when testing accommodations were denied.

Furthermore, 34 C.F.R. § 104.43 explicitly prohibits postsecondary institutions from administering rules or requirements that have the effect of subjecting students with disabilities to discrimination on the basis of disability. Requiring a disabled student to pay full tuition for three identical terms and complete 250% of the standard course volume—solely because the university failed to provide accommodated testing on single high-stakes exams—constitutes an unlawful disparate impact and an impermissible constructive penalty. Collecting Title IV federal student aid and out-of-pocket tuition for terms necessitated entirely by institutional non-compliance represents a severe regulatory and financial breach.

3. The Pretext of Repetitive Coursework and Failure of Interactive Dialogue

A central pillar of disability discrimination in this case is the university's enforcement of repetitive, mechanical digital platform coursework through Elsevier Sherpath. When a nursing student is required to retake a course due to a disputed assessment, standard educational practice and federal accessibility guidelines require that the institution evaluate prior mastery and provide reasonable curricular adaptations.

As documented in contemporaneous correspondence submitted on October 14, 2025, and escalated across senior nursing administration, the student explicitly requested an administrative review regarding why previously completed and 100% mastered Sherpath lessons and quizzes could not be waived or transferred. The student received no substantive written reply to these requests. Instead, Herzing University enforced a rigid, non-interactive policy requiring complete re-execution of all digital modules. This failure to engage in the federally required interactive process forced the student into a compounding cycle of cognitive fatigue, platform aversion, and administrative disenfranchisement.

4. Mathematical and Rhetorical Juxtaposition: Cumulative Workload Disparity

To evaluate the magnitude of discrimination, the academic record must be examined through objective mathematical comparisons. The curriculum for NSG 523 is structured across 14 distinct clinical units. Every non-disabled peer enrolled in a single standard cohort is responsible for completing one set of graded assignments totaling 58 to 60 items.

During the Summer 2025 term, the student completed all 60 graded assignments (54 Scored and 6 Pass/Fail), achieving a 100.0% completion rate. In the Fall 2025 term, despite a 6-week administrative delay in enrollment, the student completed 49 graded assignments (84.5%). In the Summer 2026 term, amid severe executive depletion and trauma-induced platform aversion, the student completed an additional 36 graded assignments (62.1%).

In total, across the three attempts, the student completed 145 fully graded assignments. Mathematically, this represents 2.50 times (250.0%) the total graded curriculum volume required of any non-disabled peer who completed the course in a single attempt. At an average duration of 50 to 80 minutes per lesson and 50-question EAQ quiz, this required 160 to 190 hours of redundant platform labor. Rhetorically and legally, forcing a student with documented neurodivergent processing disabilities to perform 250% of the baseline physical and cognitive workload to attain equal educational standing is the precise operational definition of disparate burden under Section 504.

5. Curricular Discrepancies and Scoring Alterations

The inequity of this forced repetition is further compounded by documented alterations to the course curriculum itself. Following direct communications and escalations regarding the extreme misalignment between Sherpath platform busywork and HESI/NCLEX clinical judgment standards, university curriculum coordinators modified the scoring architecture for subsequent cohorts. Key assignments—including Next Generation NCLEX (NGN) adaptive quizzes and Unit 4 EAQ assessments—were converted from rigid numerical scoring to Pass/Fail formats, and modular requirements were reduced.

While the institution implicitly recognized the unsustainable volume and flawed pedagogical structure of the original curriculum, it refused to grant retroactive relief, module waivers, or transfer credit to the student who had already completed 100% of the heavier legacy workload. The student was mandated to re-execute the outdated, heavy volume under threat of academic failure, adding severe institutional insult to documented civil rights injury.

6. Quantitative Record of Administrative Advocacy Labor

In addition to completing 250% of the academic coursework, the absence of an internal ADA grievance channel forced the student to undertake a massive secondary workload: self-advocacy, evidence compilation, and multi-agency legal drafting. This administrative burden was conducted simultaneously with full-time graduate studies under conditions of severe distress.

The compilation of over 40,200 words of formal legal and administrative filings represents the equivalent of drafting an entire graduate-level thesis. Conducting 181 hours of high-stakes legal advocacy while managing graduate clinical nursing requirements represents an egregious administrative tax imposed solely due to Herzing University's failure to maintain lawful accommodation systems.

Document / Regulatory Filing	Jurisdiction / Recipient	Word Count	Labor	Primary Source
Comprehensive SAP Appeal and Exhibit Index	Herzing University Appeals Committee	18,500 words	50.0 hours	Exhibit A, SAP Appeal Dossier
Critical Intervention and Continuity Escalation	Herzing Nursing Leadership & Faculty	2,800 words	14.0 hours	Exhibit E, Critical Escalation
Florida Board of Nursing Formal Complaint	FL Board of Nursing / DOH (Bin C-02)	3,200 words	12.0 hours	OCR Case 05262347 / FL BON
Commission on Collegiate Nursing Education (CCNE) Complaint	CCNE Accreditation Review Committee	3,500 words	12.0 hours	CCNE Formal Filing
Higher Learning Commission (HLC) Formal Complaint	HLC Institutional Complaints Unit	4,200 words	15.0 hours	HLC Review Docket
U.S. Department of Education OIG Report of Non-Compliance	US DOE Office of Inspector General	2,600 words	10.0 hours	OIG Federal Submission
Wisconsin DSPS / Board of Nursing Complaint	WI Board of Nursing / DSPS	3,000 words	10.0 hours	DSPS Official Complaint
Ten-Month Timeline Pre-Dismissal Escalation	Registrar, Student Services, ADA Office	2,400 words	8.0 hours	Exhibit F, 10-Month Timeline
Cumulative Advocacy Record	**Multi-Agency Legal & Institutional Network**	**40,200+ words**	**181.0+ hours**	**Master Administrative Archive**

Verified Transcript and Metadata: September 18, 2026 Administrative Meeting

MEETING METADATA & SYSTEM AUDIT RECORD

Platform / Host App: Microsoft Teams / SharePoint App

Host: Angie Zamecnik, M.S., M.B.A. (Director of Student Services - Online Nursing)

Attendee: Chavon Wright (Student ID: W24672939)

Date & Time: September 18, 2026 | Duration: 27m 45s

Access Restriction Notice: *Recording and transcript set to expire in 29 days; student download permissions explicitly revoked by administration despite formal disability accommodation requests.*

VERBATIM TRANSCRIPT DIALOGUE

Angie Zamecnik (Director of Student Services): "I did speak with Danielson this am and she did let her know there was an assignment that would fall under grade appeal it wouldn't change final grade of course."

Administrative Significance: *Confirms that Student Services and Vice President of Student Affairs BriAnne Danielson prejudged and finalized the denial of the student's grade appeal prior to receiving, logging, or reviewing the formal appeal submission.*

Chavon Wright (Student Response): Noted the complete absence of

good faith, highlighting that university leadership reached predetermined adverse outcomes prior to evidence submission, and documenting that five previous formal EthicsPoint filings were completely ignored without written findings or investigation.

Institutional Account Termination and Lockout Notice

Following the September 18, 2026 conference, Herzing University issued a formal deactivation notice scheduling the total termination of the student's Microsoft Outlook, Canvas, and network portal access effective October 11, 2026. This action represents a punitive administrative lockout designed to cut off ongoing appeals, suppress evidence retrieval, and eliminate student communication channels.

"It did not work to claim non-attendance when logged in on camera under legal enrollment credentials. It did not work to allege HIPAA violations for educational simulations. It did not work to deny ADA accommodations, violate FERPA privacy, extract federal loan capital, and alter grades. The final administrative recourse has been to lock out the student." — Chavon Wright

7. Executive Function Depletion and Documented Clinical Impact

The clinical and functional consequences of this compounding administrative friction are thoroughly documented across medical records. Individuals managing AuDHD (concurrent Autism Spectrum Disorder and ADHD) and Generalized Anxiety Disorder possess finite executive functioning bandwidth. Executive functions—including task initiation, set-shifting, working memory, and emotional regulation—are rapidly exhausted when subjected to chronic unpredictability, adversarial institutional resistance, and sensory-disruptive testing environments.

Contemporaneous medical and clinical records demonstrate a direct correlation between Herzing's administrative failures and severe functional deterioration:

1. *Conditioned Trauma and Platform Flooding:* Months of proctor hostility, abrupt testing interruptions, and unaddressed accommodation appeals created an acute conditioned avoidance response. Opening the Sherpath portal triggered immediate physiological distress, cognitive flooding, and profound emotional anguish, rendering routine logins an insurmountable executive barrier.

2. *Pharmacological Titration:* Psychiatric treatment logs track necessary escalations in pharmacotherapy to counteract acute academic stress. Central nervous system stimulants were titrated from baseline doses to maximum therapeutic regimens (Adderall XR 30 mg QAM with supplemental IR doses), alongside the maintenance of daily Pristiq and the introduction of Buspirone (Buspar) for severe inner tension and panic.

3. *Physical and Economic Paralysis:* The compounding crisis resulted in severe physical exhaustion, prolonged immobility, and extended bed rest following formal appeal denials. Academic delays and disability barriers reduced the student's gross taxable earnings to $0 over extended periods, pushing the household below the Federal Poverty Level and forcing reliance on state food assistance programs.

8. Exhaustive Three-Term Coursework Audit (NSG 523)

The following audit categorizes all graded coursework across all three terms of NSG 523, strictly omitting ungraded simulations and optional videos. Submissions are classified as Completed On-Time (submitted on or before the published deadline) or Completed in Accommodated Window (submitted within the legally authorized 48-to-72-hour extension window).

Term 1: Summer 2025 C16 (Course Code: NSG523-7A)

Status: Accessibility Compromised and ADA Accommodations Denied

Total Graded Items: 60 (54 Scored, 6 Pass/Fail) | Completed: 60 / 60 (100.0%)

Unit & Curriculum Block	Graded Assignment Breakdown & Grading Type	Submissions by Deadline Standard	Completion Rate
Unit 1: Professional Nursing (Due May 12, 2025)	1 EAQ Custom Quiz (Scored), 3 Interactive Lessons (Scored)	4 Completed On-Time, 0 Accommodated	100.0% (4/4)
Unit 2: Fluids & Electrolytes (Due May 19, 2025)	1 EAQ Custom Quiz (Scored), 3 Interactive Lessons (Scored)	4 Completed On-Time, 0 Accommodated	100.0% (4/4)
Unit 3: Perioperative Care (Due May 26, 2025)	1 EAQ Custom Quiz (Scored), 3 Interactive Lessons (Scored)	4 Completed On-Time, 0 Accommodated	100.0% (4/4)
Unit 4: Lower Respiratory (Due June 2, 2025)	1 NGN EAQ (Pass/Fail), 1 Unit EAQ (Pass/Fail), 3 Lessons (Scored)	5 Completed On-Time, 0 Accommodated	100.0% (5/5)
Unit 5: Gastrointestinal (Due June 9, 2025)	1 NGN EAQ (Pass/Fail), 1 Unit EAQ (Scored), 3 Lessons (Scored)	5 Completed On-Time, 0 Accommodated	100.0% (5/5)
Unit 6: Liver & Biliary	1 Unit EAQ (Scored), 3	3 Completed On-Time,	100.0% (4/4)

Unit & Curriculum Block	Graded Assignment Breakdown & Grading Type	Submissions by Deadline Standard	Completion Rate
(Due June 16, 2025)	Interactive Lessons (Scored)	1 Accommodated	
Unit 7: Cardio & Hematology (Due June 23, 2025)	1 Unit EAQ (Scored), 2 NGN EAQs (Pass/Fail), 5 Lessons (Scored)	0 Completed On-Time, 8 Accommodated	100.0% (8/8)
Unit 8: Renal & Male Repro (Due June 30, 2025)	1 Unit EAQ (Scored), 3 Interactive Lessons (Scored)	4 Completed On-Time, 0 Accommodated	100.0% (4/4)
Unit 9: Chronic Neuro (Due July 14, 2025)	1 Unit EAQ (Scored), 3 Interactive Lessons (Scored)	3 Completed On-Time, 1 Accommodated	100.0% (4/4)
Unit 10: Visual Disorders (Due July 21, 2025)	1 Unit EAQ (Scored), 2 Interactive Lessons (Scored)	0 Completed On-Time, 3 Accommodated	100.0% (3/3)
Unit 11: Endocrine (Due July 28, 2025)	1 Unit EAQ (Scored), 1 Interactive Lesson (Scored)	1 Completed On-Time, 1 Accommodated	100.0% (2/2)
Unit 12: Diabetes Mellitus (Due August 4, 2025)	1 Unit EAQ (Scored), 1 NGN EAQ (Pass/Fail), 3 Lessons (Scored)	5 Completed On-Time, 0 Accommodated	100.0% (5/5)
Unit 13: Arthritis & Immune (Due August 11, 2025)	1 Unit EAQ (Scored), 2 Interactive Lessons (Scored)	3 Completed On-Time, 0 Accommodated	100.0% (3/3)
Unit 14: Musculoskeletal (Due August 18, 2025)	1 Unit EAQ (Scored), 3 Interactive Lessons (Scored)	4 Completed On-Time, 0 Accommodated	100.0% (4/4)
Summer 2025 Term Total	**60 Graded Assignments (54 Scored, 6 Pass/Fail)**	**45 On-Time, 15 Accommodated**	**60 / 60 (100.0%)**

Term 2: Fall 2025 C16 (Course Code: NSG523-7F)

Status: Accessibility Compromised and ADA Accommodations Denied

Total Graded Items: 58 (52 Scored, 6 Pass/Fail) | Completed: 49 / 58 (84.5%)

Unit & Curriculum Block	**Graded Assignment Breakdown & Grading Type**	**Submissions by Deadline Standard**	**Completion Rate**
Units 1–3: Foundations & Preop (Due Sept 14–22, 2025)	3 Custom EAQs (Scored), 9 Interactive Lessons (Scored)	0 Completed On-Time, 12 Accommodated	100.0% (12/12)
Units 4–6: Resp, GI, Biliary (Due Sept 29 – Oct 13, 2025)	3 Custom EAQs (1 P/F, 2 Scored), 2 NGN EAQs (P/F), 9 Lessons	0 Completed On-Time, 14 Accommodated	100.0% (14/14)
Unit 7: Cardio & Hematology (Due Oct 20, 2025)	1 Custom EAQ (Scored), 2 NGN EAQs (P/F), 5 Lessons (Scored)	0 Completed On-Time, 8 Accommodated	100.0% (8/8)
Units 8–10: Renal, Neuro, Visual (Due Oct 27 – Nov 10, 2025)	3 Custom EAQs (Scored), 8 Interactive Lessons (Scored)	6 Completed On-Time, 5 Accommodated	100.0% (11/11)
Unit 11: Endocrine Problems (Due Nov 17, 2025)	1 Unit EAQ (Scored), 1 Interactive Lesson (Scored)	0 Completed (Exam 1 Denial Stalling)	0.0% (0/2)
Unit 12: Diabetes Mellitus (Due Nov 24, 2025)	1 Custom EAQ (Scored), 1 NGN EAQ (P/F), 3 Lessons (Scored)	4 Completed On-Time, 1 In Progress	80.0% (4/5)
Units 13–14: Arthritis & MSK (Due Dec 1–8, 2025)	2 Custom EAQs (Scored), 4 Interactive Lessons (Scored)	0 Completed (Appeal Breakdown)	0.0% (0/6)
Fall 2025 Term Total	**58 Graded Assignments (52 Scored, 6 Pass/Fail)**	**10 On-Time, 39 Accommodated**	**49 / 58 (84.5%)**

Term 3: Summer 2026 C16 (Course Code: NSG523-7)

Status: Accessibility Compromised and ADA Accommodations Denied

Total Graded Items: 58 (53 Scored, 5 Pass/Fail) | Completed: 36 / 58 (62.1%)

Unit & Curriculum Block	**Graded Assignment Breakdown & Grading Type**	**Submissions by Deadline Standard**	**Completion Rate**
Units 1–3: Foundations & Preop (Due May 11–25, 2026)	3 Custom EAQs (Scored), 9 Interactive Lessons (Scored)	3 Completed On-Time, 7 Accommodated, 2 In Progress	83.3% (10/12)
Units 4–6: Resp, GI, Biliary (Due June 1–15, 2026)	3 Custom EAQs (Scored), 2 NGN EAQs (P/F), 8 Lessons (Scored)	7 Completed On-Time, 6 Accommodated	100.0% (13/13)
Unit 7: Cardio & Hematology (Due June 22, 2026)	1 Custom EAQ (Scored), 2 NGN EAQs (P/F), 5 Lessons (Scored)	7 Completed On-Time, 0 Accommodated, 1 Not Started	87.5% (7/8)
Units 8–10: Renal, Neuro, Visual (Due June 29 – July 20, 2026)	3 Custom EAQs (Scored), 7 Interactive Lessons (Scored)	3 Completed On-Time, 1 Accommodated, 6 Not Started	40.0% (4/10)
Units 11–14: Endocrine, Diabetes, MSK (Due July 27 – Aug 17, 2026)	4 Custom EAQs (Scored), 1 NGN EAQ (P/F), 8 Lessons (Scored)	2 Completed On-Time, 0 Accommodated, 11 Not Started	15.4% (2/13)
Summer 2026 Term Total	**58 Graded Assignments (53 Scored, 5 Pass/Fail)**	**22 On-Time, 14 Accommodated**	**36 / 58 (62.1%)**

Institutional Operational, Financial, and Equity Audit Matrix

- Total Post-Baccalaureate Enrollment: 3,667 Students (IPEDS EFFY2023)
- Black Female Graduate Enrollment: 1,116 Students (88.92% of Black graduate cohort; 30.43% of total)
- Black Graduate Enrollment Share: 34.22% vs. Wisconsin State Black Population of 6.60%
- Federal Workforce Diversity Grant: $1,920,000 HRSA Award
- Disparate Workload Multiplier: 2.50x Burden (145 completed assignments vs. 58 peer baseline)
- State Higher Ed Economic Footprint: $5.4B to $7.0B annually (WAICU Statewide Assessment)
- Executive Political Donations: $63,000+ to state political funds ($24k to Scott Walker committees)

9. Conclusion and Legal Remedies Sought

The empirical academic record establishes conclusively that the student achieved 100.0% completion and mastery of the NSG 523 curriculum during the initial Summer 2025 term. The subsequent retakes and progressive completion declines in Fall 2025 (84.5%) and Summer 2026 (62.1%) were the direct, documented consequence of institutional accommodation denials, hostile proctoring interruptions, lack of an ADA grievance mechanism, and severe executive function depletion resulting from 181+ hours of forced legal advocacy.

Subjecting a disabled graduate nursing student to 250% of the baseline academic workload, charging triple tuition for courses made inaccessible by institutional non-compliance, and refusing to engage in interactive dialogue constitutes actionable discrimination under Title III of the ADA and Section 504 of the Rehabilitation Act.

Appropriate administrative and legal remedies include:

1. Full retroactive grade recalculation and course credit conferral for NSG 523 based on documented mastery

2. Tuition reimbursement and cancellation of institutionally sanctioned federal loan debt associated with retake terms

Formal correction of academic transcripts

4. Structural reform of proctoring and accommodation systems to ensure full federal compliance for all current and future nursing students.

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Regulatory Action Plan & Legal Discovery Demands

- Higher Learning Commission (HLC): Formal complaint under Criterion Two (Integrity: Ethical and Responsible Conduct).
- Commission on Collegiate Nursing Education (CCNE): Filing under Key Element I-E (Fair Practices and Integrity).
- Department of Education Office for Civil Rights (OCR): Title VI Disparate Impact Complaint (42 U.S.C. § 2000d) and Section 504 accommodation denial enforcement.
- Department of Justice Civil Rights Division: Title III ADA systemic discrimination and retaliation filing.
- Subpoena & Discovery Requests: Demands for unredacted Canvas grade change audit trails under FERPA (34 CFR Part 99), disaggregated MSNDE cohort attrition and completion data by race, and raw ProctorU session telemetry.