CWRIGHT26 · UNIFIED LEGAL, CURRICULAR, REGULATORY & EVIDENTIARY COMPENDIUM

UNREDACTED COMPLETE EVIDENTIARY & LEGAL EDITION (CONTAINS FULL CASE/PII IDENTIFIERS)

CHAVON JENEA WRIGHT (CWright26) v. HERZING UNIVERSITY, INC.: COMPLETE TEN-VOLUME EVIDENTIARY COMPENDIUM, UPDATED CURRICULUM VITAE, STANDALONE CASE & TICKET REGISTRY, VERBATIM TRANSCRIPTS & STATUTORY AUTHORITIES

Prepared By: Chavon Jenea Wright (`CWright26` · Student ID: `W24672939`) · Ocala, Marion County, Florida (`597 Marion Oaks Trail, Ocala, FL 34473` · `(352) 300-5416` · `chavon.wright@gmail.com`)
Compilation Date: November 3, 2026 · **Primary Judicial Venues:** **U.S. District Court, Middle District of Florida, Ocala Division**, **Fifth Judicial Circuit of Florida (Marion County)** & **Eastern District of Wisconsin**

SWORN GOOD-FAITH DUE DILIGENCE, TRANSPARENCY & INITIAL PRO SE LEGAL DISCLAIMER

1. Utmost Due Diligence, Openness, Honesty & Absence of Malice: Pursuant to **28 U.S.C. § 1746** and Federal Rule of Civil Procedure 11(b), Petitioner/Plaintiff **Chavon Jenea Wright (`CWright26`)** declares that every factual statement, grade audit, credit calculation, transcript excerpt, and legal analysis compiled herein was prepared in **strict good faith, for legitimate regulatory, educational, and judicial redress, and without malice**.

2. Academic Credential Summary (SNHU Graduate Coursework & Undergraduate Degrees): Across this entire Compendium, Chavon Wright's graduate study at **Southern New Hampshire University (SNHU)** (2022–2024; 12 graduate courses / 36.00 semester credits in the M.S. in Forensic Psychology program) is stated as **completed graduate coursework**, alongside her Bachelor of Science in Integrative Studies (**Eastern Oregon University**, March 19, 2021) and three Associate degrees (**Lane Community College**, March 23, 2019, 4.10 GPA).

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SECTION I · COMPLETE INTERACTIVE TABLE OF CONTENTS & NAVIGATION ARCHITECTURE

COMPLETE TABLE OF CONTENTS (ALL BLACK UNDERLINED LINKS INTERACTIVE & BIDIRECTIONAL)

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SECTION II · STANDALONE MODULAR CASE, DOCKET, ETHICSPOINT & TICKET REGISTRY

CWRIGHT26 STANDALONE CASE & TICKET REGISTRY SHEET (LIVE UPDATABLE STANDALONE PDF & HUADA+ REGISTRY + COMPLETE NUMERICAL INVENTORY)

Synchronized with Standalone Downloadable PDF & HUADA+ Registry **CWright26. 10.19. Herzing. Case and Ticket Registry** so New Case or Ticket Numbers Can Be Logged Without Regenerating the Compendium

STANDALONE CASE & TICKET REGISTRY (DOWNLOADABLE PDF & HUADA+ ARCHIVE) (SCAN QR OR CLICK LINK TO UPDATE)

Standalone Updatable Sheet URL: https://wrighthuada.netlify.app/

This page is designed as a **modular single-sheet registry**. All 17 primary agency/case identifiers, all 15 EthicsPoint filings (7 submitted + 8 prepared/unsubmitted due to portal futility), all 18 ServiceNow (INC/REQ/RITM/PRV) and Canvas Support audit cases, and all Herzing Access / ADA email counts are linked directly to the live Standalone Registry PDF & HUADA+ Archive above. Whenever a new federal docket, court case number, or agency ticket is issued, update the Standalone Registry PDF & HUADA+ Archive directly without needing to rebuild the entire Compendium.

1. Primary Case, Agency Docket & Institutional Identifier Table (17 Core Identifiers)

Tracking Domain	Official Identifier / Docket / Case Number	Date / Status	Controlling Authority & Clickable Verification Link
Student Legal Name & Code	**Chavon Jenea Wright (CWright26)**	Active Petitioner / Plaintiff	**HUADA+ Digital Evidence Repository**
Student ID Number	**W24672939**	Enrolled Aug 2024 – Present	**Sworn 28 U.S.C. § 1746 Declaration**
OCR Civil Rights Case	**Case 05262347 (#05-26-2347)**	Oct 13, 2026 OCR Reply Contested	29 U.S.C. § 794 (Section 504) · **Oct 14 Forwarded Email**
DOJ Civil Rights Referral	**766398-JVT**	Active Federal Referral	42 U.S.C. § 12182 (ADA Title III) · **U.S. Dept. of Justice CRT**
Herzing SAP Appeal Case	**Case 00542344**	Sept 4, 2026 • Summary Dismissal	34 C.F.R. § 668.34 · **Zamecnik Sept 27 Evidentiary Packet**
EthicsPoint Report Key	**607735433401**	Sept 16, 2026 • Consolidated Key	**10-Page Historical Whistleblower Record**
EthicsPoint Filing 1	**EP-2025-1210**	Dec 10, 2025 • Ignored	Accommodation & Accessibility Non-Compliance (**Source**)
EthicsPoint Filing 2	**EP-2025-1219**	Dec 19, 2025 • Suppressed	Retaliatory Grading & Disability Hostility (**Source**)
EthicsPoint Filing 3	**EP-2026-0324**	Mar 24, 2026 • Archived	SAP Portal Lockout & Authenticator Block (INC0546918, **Source**)
EthicsPoint Filing 4	**EP-2026-0728**	Jul 28, 2026 • Ignored	Clinical Hours & Syllabi Manipulation (**Source**)
EthicsPoint Filing 5	**EP-2026-0828**	Aug 28, 2026 • Ignored	FERPA Withholding & Due Process Deprivation (**Source**)
EthicsPoint Filing 6	**Case 00542344**	Sept 4, 2026 • Dismissal	Combined Grade & SAP Appeal Summary Dismissal (**Source**)
ProctorU / Meazure Ticket	**Support Ticket 7407283**	2025–2026 • Unresolved Vendor Log	Remote Proctoring Technical & Accommodation Failure (**Source**)
Proctorio Collapse Incident	**July 17, 2025 Collapse**	July 17, 2025 • Exam Crash	Extension Crash & Accommodated Timer Failure (**Source**)
SSA Disability Case	**SSI/SSDI 19900645**	Verified Federal Disability Record	42 U.S.C. § 12102 / 29 U.S.C. § 705(20) Qualifying Disability
Herzing ADA Case ID	**HUADA.082426.V3**	Aug 24, 2026 • Non-Implemented	200% Time, Distraction-Reduced Room, 48–72 Hr Extensions, Video/Transcript
Herzing IPEDS / OPE ID	**UnitID 240392 / 00962100**	Active Title IV PPA Participant	**NCES College Navigator Profile** · 34 C.F.R. § 668.14
Higher Learning Commission	**Criterion 2 & 3 Complaint**	Confirmed Oct 14, 2026 (1a135f2b9fcb6963)	**HLC Institutional Integrity & Quality Review**
CCNE Accreditation Filing	**CCNE Quality Review Filing**	2026 Programmatic Complaint	**Commission on Collegiate Nursing Education**
State Licensing Boards	**Wisconsin DSPS & Florida BON**	Dual-State Regulatory Notices	**WI DSPS** (Wis. Admin. Code ch. N 1) & **FL BON** (Fla. Stat. ch. 464)

Tracking Domain	Official Identifier / Docket / Case Number	Date / Status	Controlling Authority & Clickable Verification Link
ED OIG Hotline Referral	**`Title IV 34 CFR § 668.34`**	2026 Inspector General Audit	**U.S. Dept. of Education OIG Hotline**
FSA / MOHELA Dispute	**`Borrower Defense Dispute`**	34 C.F.R. § 685.402 / § 685.206	**Federal Student Aid Borrower Defense** ($17,225 + $4,193)
IRS Whistleblower Office	**`Form 211 & Form 13909`**	501(c)(3) Governance Challenge	**IRS Whistleblower & TE/GE Exempt Organization Referral**

2. Complete Inventory of Unsubmitted / Prepared EthicsPoint Packets (Withheld Due to Portal Futility) & ServiceNow / Canvas / ADA Email Counts

Category / System	Packet / Ticket / Series Identifier	Verified Count / Volume	Detailed Description & Clickable Evidence Link
Unsubmitted EthicsPoint Packet 1 (Sept 27, 2026)	`CWright26. 9.27. HUADA. Angie Zamecnik Evidentiary Packet`	11 Pages (Prepared Packet)	Documents Angie Zamecnik & Dr. Danielle Laban pre-determining appeal outcomes ("you can appeal, but it's not changing your grade") and SharePoint MP4 lockout (**PDF**).
Unsubmitted EthicsPoint Packet 2 (Sept 28, 2026)	`CW. 9.28. HUADA. EthicsPoint Filing 1 - FERPA Violations & Records Concealment`	Prepared Packet	Documents 20 U.S.C. § 1232g & 34 C.F.R. § 99.10 violations for withholding Transfer Credit Evaluation and Canvas grade audit logs beyond 45 days (**PDF**).
Unsubmitted EthicsPoint Packet 3 (Sept 28, 2026)	`CW. 9.28. HUADA. EthicsPoint Filing 2 - Due Process Deprivation & Sham Appeals`	Prepared Packet	Documents procedural due process deprivation, violation of mandatory Incomplete ("I") policy during pending appeal, and arbitrary dismissal (**PDF**).
Unsubmitted EthicsPoint Packet 4 (Oct 5, 2026)	`CWright26. EthicsPoint 1. Communication`	Prepared Packet	Documents 9 bounced institutional compliance/legal emails, advisor removal, and administrative communication blackout (**PDF**).
Unsubmitted EthicsPoint Packet 5 (Oct 5, 2026)	`EthicsPoint. 2. EEOC, ADA, Discrimination, Harassment`	16 Pages (Prepared Packet)	Comprehensive civil rights packet detailing systemic failure to implement `HUADA.082426.V3` and hostility toward disabled student (**PDF**).
Unsubmitted EthicsPoint Packet 6 (Oct 5, 2026)	`CWright26. EthicsPoint 3. Financial and Benefits Abuse`	Prepared Packet	Documents $17,225 Title IV debt + $4,193 disputed balance, unearned tuition retention, and coercive re-enrollment charges (**PDF**).
Unsubmitted EthicsPoint Packet 7 (Oct 5, 2026)	`CWright26. EthicsPoint 4. Safety of Physical Environment`	Prepared Packet	Documents physiological/autonomic distress during unaccommodated proctoring and clinical scheduling obstruction (**PDF**).
Unsubmitted EthicsPoint Packet 8 (Oct 5, 2026)	`CWright26. EthicsPoint 5. Security and Misuse of Data`	8 Pages (Prepared Packet)	Documents 41 unauthorized ADA disclosures to ~35 staff and post-term Canvas LMS grade tampering (**PDF**).
HU Assist ServiceNow Tickets	`INC0546918`, `INC0558250`, `INC0583501`, `INC0584221`, `REQ0109491`, `RITM0118168`, `INC0587386`, `INC0587430`, `INC0587470`, `PRV0343739`	10 Primary ServiceNow IDs + 300+ Loop Emails	Includes March 2026 SAP lockout (`INC0546918`), May 2026 omnibus escalation (`INC0558250`), Oct 2026 prematurely closed missing course materials request (`RITM0118168`), and Oct 13 300+ email flood (`INC0587386`, **Source**).
Instructure Canvas Support Cases	`#00000060`, `#00000077`, `#00000039`, `#00000004` + Loop Cases 15729468, 15730941, 15731385, 15733197, 15733275, 15733351, 15733432, 15733515	12 Canvas Case Numbers	Covers Canvas account lockout (`#00000060`), personal data export request (`#00000077`), and `NSG 523` Grade Change History & Audit Logs request (`#00000039`, **Source**).
Herzing Access / ADA & Bounced Compliance Emails	May 2–19, 2025 Broadcasts + Sept 2026 ADA Notices + Aug–Oct 2026 Postmaster Bounces	**41** Unauthorized Disclosures + **12** ADA Auto-Replies + **9** Bounced Compliance Emails (**62+ Total**)	41 unauthorized ADA accommodation broadcasts sent to ~35 staff (**Audit Sheet**); 6 Sept 2026 `ada@herzing.edu` notices + 6 `admissions@herzing.edu` auto-replies; 9 postmaster bounces from `compliance@herzing.edu`, `legal@herzing.edu`, `sapappeals@herzing.edu`, and `advising@herzing.edu`.

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CWRIGHT26 · CURRICULUM VITAE & QUAD-CHECKED ACADEMIC CREDENTIAL AUDIT

UPDATED CURRICULUM VITAE, CLINICAL EXTERNSHIP RECORD & FIVE-INSTITUTION COURSEWORK AUDIT

Incorporating July–October 2026 Curriculum Vitae Updates, HCA Healthcare Osceola Clinical Rotations (PCU & ED), SAEF Practice Framework, Six-School Second-Bachelor's Matrix, and Verified SNHU Graduate Coursework Clarification

QUAD-CHECKED CREDENTIAL VERIFICATION NOTICE (SOUTHERN NEW HAMPSHIRE UNIVERSITY & HERZING UNIVERSITY)

1. Southern New Hampshire University (SNHU) — Master of Science in Forensic Psychology Graduate Coursework (36.00 Credits / 12 Courses, 2022–2024): Between 2022 and May 2024, Chavon Jenea Wright (`CWright26`) completed **12 graduate courses (36.00 semester credits)** in the *Master of Science in Forensic Psychology* program at **Southern New Hampshire University** (Manchester, NH), including `PSY 510`, `PSY 520`, `PSY 530`, `PSY 545`, `PSY 610`, `PSY 622`, `PSY 624`, and `PSY 638`, and held active membership in the American Psychological Association of Graduate Students (APAGS), the Justice Studies Association, and the National Association of Scholars.

2. Undergraduate Degrees Held: (a) **Bachelor of Science in Integrative Studies** (Minors in English/Writing & History; 61 institutional credits, 3.30 GPA, two-time Dean's List, Spring Symposium Featured Speaker), **Awarded March 19, 2021** by **Eastern Oregon University** (La Grande, OR); and (b) **Three Associate Degrees** — *Associate of Arts (Oregon Transfer)*, *Associate of Science (Lower Division Science)*, and *Associate of General Studies (Leadership Development)* (4.10 GPA, President's List), **Awarded March 23, 2019** by **Lane Community College** (Eugene, OR).

3. Herzing University Graduate Nursing & Foundational Science Coursework (2024–2026): 31.00 to 40.00 semester credits earned/transferred in the Direct Entry Master of Science in Nursing (`MSN-DE`) pathway at **Herzing University** (Student ID `W24672939`), including a **4.00 GPA in Foundational Sciences** (`SC 154` Anatomy & Physiology I [Grade A, 4 cr] and `SC 254` Anatomy & Physiology II [Grade A, 4 cr]), `NSG 520` Pathophysiology & Pharmacology (Grade B, 4 cr), `NSG 521` Fundamentals & Health Assessment (Grade B, 5 cr), `NSG 522` Psych-Mental Health Nursing, `NU 700` Knowledge for Nursing Practice (Grade B+, 3 cr), `NU 760` Informatics & Healthcare Technologies (Grade B, 3 cr), and `NU 725` Systems-Based Practice / Population Health, plus **135+ hospital clinical hours** in Progressive Care Unit (PCU) and Emergency Department (ED) rotations at **HCA Florida Osceola Hospital** (Kissimmee, FL) and **50 virtual clinical hours**.

1. Executive Curriculum Vitae — Chavon Jenea Wright (CWright26)

Credential / Domain	Institution / Organization	Dates	Verified Status, Honors & Scope
Graduate Nursing & Health Sciences Coursework (MSN-DE → BSHHS)	**Herzing University** (Madison, WI / Winter Park, FL Online)	Aug 2024 – Present (Oct 2026)	**Coursework Completed (Active Program Transition & Grade Appeal Dispute):** 31.00 TCE-verified transfer credits / 40.00 total credits; 4.00 A&P I/II GPA; 3.66 institutional GPA prior to disputed unaccommodated assessments; PCU & ED clinical rotations at HCA Florida Osceola Hospital.
Master of Science in Forensic Psychology (Graduate Coursework)	**Southern New Hampshire University** (Manchester, NH)	2022 – May 2024	**Graduate Coursework Completed (36 Credits / 12 Courses):** Completed 12 graduate forensic psychology courses (`PSY 510`–`PSY 638`). Member: APA Graduate Students (APAGS), Justice Studies Association, National Association of Scholars.
Bachelor of Science in Integrative Studies (Awarded)	**Eastern Oregon University** (La Grande, OR)	2019 – Mar 19, 2021	**Bachelor of Science (B.S., March 19, 2021):** Minors in English/Writing & History (Cultural Studies, History of Medicine & Rhetoric). 61 institutional hrs, 3.30 GPA, Dean's List (x2), Spring Symposium Featured Speaker, NSCS, Phi Theta Kappa.
Three Associate Degrees: A.A.OT, A.S., & A.G.S. (Awarded)	**Lane Community College** (Eugene, OR)	2018 – Mar 23, 2019	**Three Associate Degrees (A.A.OT, A.S., A.G.S., March 23, 2019):** 4.10 GPA, President's List, Black Student Union VP of Relations, Debate Team VP, NPDA National Speaker Award, Phi Theta Kappa.
Undergraduate Natural Sciences & Biology Major Coursework	**Georgia State University** (Atlanta, GA) & **Savannah State University**	2006 – 2011	**119 Earned Semester Hours (89 GSU + 30 SSU Transfer):** Biology major & Literature minor coursework including General & Organic Chemistry w/ Labs, Physics I w/ Lab, Microbiology & Public Health, Evolution, Marine & Animal Biology, Elementary Statistics (`MATH 1070`), and Medical Terminology (`HHS 2010`). Beta Beta Beta Biological Honor Society (Eta Psi Chapter).

2. Clinical, Healthcare, Advocacy & Leadership Experience

Role / Title	Organization & Location	Timeframe	Key Clinical, Regulatory & Operational Responsibilities
Clinical Rotation Student Nurse / Extern (PCU & ED)	**HCA Healthcare Kissimmee Osceola Hospital** (Kissimmee, FL)	May 2025 – July 2025	Delivered direct patient care and head-to-toe assessments across diverse high-acuity populations in Progressive Care Unit (PCU) and Emergency Department (ED) settings; executed medication administration, wound care, telemetry monitoring, crisis stabilization, and interdisciplinary care coordination.
Survivor Services Assistant Manager	**RAINN** / **U.S. Department of Defense Safe Helpline** (Washington, DC / Remote)	Feb 2023 – May 2024	Directed trauma-informed crisis intervention and social services coordination for active-duty military personnel and families; ensured strict federal healthcare and confidentiality compliance; authored survivor education and medicolegal advocacy resources.

Role / Title	Organization & Location	Timeframe	Key Clinical, Regulatory & Operational Responsibilities
Founder & Director / Director of Care Management	Fundamental Human Wrights, Inc. (Ocala, FL)	Jan 2020 – Present	Orchestrated interdisciplinary consulting, care coordination, and social services for marginalized and disabled populations nationwide; achieved 100% annual donor retention via grant writing and compliance governance.
Medicare Lead Sales Associate	**Kaiser Permanente** (Remote)	Jan 2020 – Dec 2022	Supervised 15–20 licensed Medicare agents, increasing team production by >10% and achieving a 75% individual conversion rate while enforcing strict CMS, HIPAA, and Fraud/Waste/Abuse regulatory compliance.
Licensed Medicare & Health Insurance Producer (27 States)	**UnitedHealthcare** (Ocala, FL / Remote)	2020 – 2021	Positioned 600+ policies across 27 states at a 65% conversion rate; counselled disabled and dual-eligible beneficiaries on Medicare/ Medicaid coordination and statutory rights.
Unit Clerk (Long-Term Care & Rehabilitation)	Centers Health Care — Onondaga Long Term Care & Rehabilitation (Syracuse, NY)	2022	Managed EHR/medical charting, admission/discharge workflows, clinical scheduling, and interdisciplinary nursing unit communications.
Multicultural Program Coordinator & Campus Political Organizer	**Lane Community College** & **University of Oregon** (Eugene, OR)	2018 – 2020	Delivered cultural competency training to 2,000+ faculty/staff; facilitated legislative sponsorship for Oregon's CROWN Act (HB 2935, enacted 2021); recruited and trained 130+ volunteers raising student voter turnout by 30%.

3. Licenses, Certifications, Target Career Applications & Volunteer Service

- **Active & Historical Certifications:** Basic Life Support (BLS) Provider & Heartsaver CPR/AED (**American Heart Association**); Intermediate Victim Advocate (**National Advocate Credentialing Program — NACP**); Psychiatric Technician Level IV / NCPT (**American Association of Psychiatric Technicians**); Sexual & Physical Assault Support Counselor (**RAINN**); Level 1 Trauma ED Triage (**Grady Health System**); Framework for Effective Care Coordination (**Florida Certification Board**); Licensed Life & Health Insurance Producer (**Florida DFS + 27 States**); Diversity & Inclusion and Digital Leadership (**Cornell University**); Autism Awareness & Special Needs Education (**International Open Academy**); TEFL Certification.
- **Documented 2025–2026 Clinical Externship & Residency Applications Impacted by Herzing's Administrative Obstruction:** **AdventHealth Ocala & Greater Orlando Student Nurse Tech**; **HCA Healthcare Ocala, Pensacola, Tallahassee & St. Petersburg Nurse Extern / New Grad RN Residency**; **Rasmussen University Nurse Lab Assistant**; Medicaid Eligibility Advocate; and HCA Revenue Integrity Charge Review Analyst.
- **Longstanding Community & Clinical Volunteer Record (2008–Present):** Humane Society of Marion County (2023–Present); National Multiple Sclerosis Society (2012–Present); Egan Warming Center (2017–Present); Oregon Supported Living Program (2018–2020); Piedmont Hospital Atlanta (2010–2013); Atlanta Children's Shelter (2010); Grady Health System Emergency Care Center (2009); Laurel Park Nursing & Rehab Facility (2008).

4. Complete Verbatim Text of Comprehensive Academic Record, Six-School Matrix & SAEF Practice Plan

Academic Record Source Page 1 of 15

CHAVON J. WRIGHT
Comprehensive Academic Record
Complete Course Record - Five Institutions, 2007-2025
Educational Overview | Curriculum Vitae
Six-School Second-Degree Matrix | Goals Timeline
SAEF Working Plan | Further Learning
Ocala, Florida (Marion County) · born February 1988 · chavon.wright@gmail.com · (352) 300-5416
Degrees held: A.A. / A.S. / A.G.S. (Lane CC, 2019) · B.S. Integrative Studies (Eastern Oregon, 2021) · M.S. Forensic Psychology Graduate Coursework (SNHU, 2022–2024; 36.00 Graduate Credits)
Compiled July 16, 2026 from unofficial transcripts, resumes, and the SAEF practice framework

Academic Record Source Page 2 of 15

Chavon J. Wright - Comprehensive Academic Record (with Education Options) - July 2026
2
1 · Complete Passed-Course Record
Every passed class across five institutions - where, when, grade, credits, the transcript page it lives on, and what the course actually was. Withdrawn and failed attempts are excluded; this is the record of what counts.
Savannah State University - Savannah, GA (c. 2006-2007): 30 semester hours accepted in transfer by Georgia State (transfer GPA 2.90); Eastern Oregon later recorded 36 hours. Course-by-course detail is not itemized on the available unofficial records - order an official Savannah State transcript to itemize. These hours are freshman-core era coursework and they transfer.
Georgia State University · Atlanta, GA · 2007-2011
89 institutional hrs passed + 30 transfer = 119 earned
Course
Title
Term
Grade
Cr
Pg
What it was
ANTH 1102
Intro to Anthropology
Fall 2007
C-
3
p.1
Survey of human cultures, evolution, and social organization

CHEM 1151K
Survey of Chemistry I
Fall 2007
D
4
p.1
Non-majors general chemistry with laboratory
PSYC 2103
Intro to Human
Development
Fall 2007
D
3
p.2
Lifespan human development, birth through aging
ENGL 1102
English Composition II
Spr 2008
B
3
p.2
Argument, research writing, and literary analysis
MATH 1070
Elementary Statistics
Spr 2008
C+
3
p.2
Probability, descriptive stats, hypothesis testing
SPCH 1000
Human Communication
Spr 2008
B-
2
p.2
Interpersonal and public communication fundamentals
CHEM 1201
Chem I Concept
Development
Sum
2008
A
1
p.2
Guided problem-solving companion to General
Chemistry I
CHEM 1211K
General Chemistry I
Sum
2008
B-
4
p.2
Majors chemistry I - stoichiometry, bonding; with lab
MATH 1113
Precalculus
Sum
2008
D
3
p.2
Functions and trigonometry preparing for calculus
POLS 1101
American Government
Sum
2008
C+
3
p.2
US constitutional structure and political institutions
BIOL 2107K
Principles of Biology I
Fall 2008
C
4
p.2
Cell biology, molecular genetics foundations; with lab
CHEM 1203
Chem II Concept
Development
Fall 2008
A
1
p.2
Problem-solving companion to Chemistry II
CHEM 1212K
Principles of Chemistry II
Fall 2008

B-
4
p.2
Equilibria, kinetics, thermodynamics; with lab
SPAN 1001
Elementary Spanish I
Fall 2008
B-
3
p.2
Introductory Spanish language and culture
BIOL 2300
Microbiology & Public
Health
Spr 2009
C
3
p.3
Microorganisms, infection, and community health
HIST 1112
World History Since 1500
Spr 2009
A
3
p.3
Global history from early modern era to present
THEA 2040
Intro to the Theatre
Spr 2009
B
3
p.3
Theatre history, form, and performance analysis
BIOL 2108K
Principles of Biology II
Sum
2009
B
4
p.3
Organismal biology, evolution, ecology; with lab
BIOL 4930
Topics in Biology
Sum
2009
C+
4
p.3
Advanced special-topics biology seminar
BIOL 4930
Topics in Biology
Sum
2009
B
4
p.3
Second advanced special-topics biology seminar
BIOL 3020
Intro to Marine Biology
Fall 2009
C
3
p.3
Marine ecosystems, organisms, and ocean processes
BIOL 3840
Animal Biology
Fall 2009
C
3
p.3
Animal form, function, and phylogenetic diversity
PHIL 2010
Intro to Philosophy
Fall 2009
B
3
p.3
Core problems: knowledge, mind, ethics, existence

Academic Record Source Page 3 of 15

Chavon J. Wright - Comprehensive Academic Record (with Education Options) - July 2026
3
Georgia State University · Atlanta, GA · 2007-2011
89 institutional hrs passed + 30 transfer = 119 earned
Course
Title

Term
Grade
Cr
Pg
What it was
PHYS 1111K
Introductory Physics I
Fall 2009
C
4
p.3
Algebra-based mechanics and waves; with lab
BIOL 3440
Fundamentals of Evolution
Spr 2010
B-
3
p.4
Evolutionary theory, selection, population genetics
CHEM 3100
Organic Chemistry Lab I
Spr 2010
B
2
p.4
Organic synthesis and separation lab techniques
HHS 2010
Med Terminology for
Healthcare
Fall 2010
C
3
p.4
Clinical vocabulary for healthcare documentation
Lane Community College · Eugene, OR · 2018-2019
30 credits, GPA 4.10, President's List - THREE associate degrees awarded 3/23/2019 (A.A. Oregon Transfer / A.S. Lower Division Science / A.G.S.)
Course
Title
Term
Grade
Cr
Pg
What it was
COMM 221
Adv. Public Communication
Fall 2018
A
1
p.1
Advanced public-speaking practicum
ENG 260
Intro to Women Writers
Fall 2018
A
4
p.1
Literature by women writers across eras
ENG 104
Intro to Literature: Fiction
Win 2019
A+
4
p.1
Close reading of short fiction and novels
ES 223
African American Studies
Win 2019
A+
4
p.1
Black history, culture, and politics in the US
ES 241
Native American Studies
Win 2019
A
4
p.1
Indigenous histories and contemporary issues
HE 161
Cardiopulmonary
Resuscitation
Win 2019
A+
1
p.1
CPR certification coursework
PE 106

Yogilates
Win 2019
A
1
p.1
Yoga-Pilates fitness practicum
PE 108
Conditioning
Win 2019
A
1
p.1
Strength and endurance conditioning
SLD 121
African American
Leadership
Win 2019
A
4
p.1
Leadership development in Black community contexts
PE 111
Group Cycling
Spr 2019
A+
1
p.2
Indoor cycling fitness practicum
PE 113
Fitness Ed: Introduction
Spr 2019
P
1
p.2
Foundations of personal fitness education
SLD 103
Post-Racial America
Spr 2019
A
4
p.2
Seminar on race, policy, and public discourse
Eastern Oregon University · La Grande, OR · 2019-2021
61 earned hrs, EOU GPA 3.30 - B.S. Integrative Studies AWARDED 3/19/2021 (minors: English/Writing + History); Dean's List x2
Course
Title
Term
Grade
Cr
Pg
What it was
WR 122
Argumentative Writing
Win 2020
B
4
p.1
Thesis-driven argument and rhetorical strategy
IS 301
Intro to Integrative Studies
Win 2020
A
3
p.1
Interdisciplinary research design and methods
ENGL 201
Shakespeare
Spr 2020
A-
4
p.1
Shakespeare's plays in historical context
ENGL 395
Gender in Lit/Film
Spr 2020
A
4
p.1
Gender theory through literature and film
IS 401
Integrative Studies
Capstone
Spr 2020
A-
3
p.1
Integrative senior research project
LIB 307

Online Research Tools
Spr 2020
B
2
p.1
Scholarly databases and information literacy
ENGL 382
American Lit After 1865
Sum
2020
A-
4
p.1
Realism through contemporary American literature
HIST 202
US History Since 1865
Sum
2020
B+
5
p.1
Reconstruction to the present
WR 341
Intermediate Fiction
Sum
2020
A
4
p.1
Fiction-writing workshop
HIST 319
US History Through Film
Fall 2020
B
5
p.1
American historiography examined through cinema

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Eastern Oregon University · La Grande, OR · 2019-2021
61 earned hrs, EOU GPA 3.30 - B.S. Integrative Studies AWARDED 3/19/2021 (minors: English/Writing + History); Dean's List x2
Course
Title
Term
Grade
Cr
Pg
What it was
HIST 415
Blood, Phlegm & Bile
Fall 2020
A-
5
p.1
History of Western medicine from humoral theory on
SOC 336
Social Change & Social
Justice
Fall 2020
A
3
p.1
Movements, power structures, and inequality
WR 320
Professional Writing
Fall 2020
B
3
p.1
Workplace, grant, and technical writing
HIST 333
Labor & Working Class in
Am. Hist
Win 2021
A-
5
p.1
US labor and working-class history
WR 222
Introduction to Rhetoric
Win 2021
A-
4
p.1

Rhetorical theory and critical analysis
WR 360
Literacy, Discrimination &
Power
Win 2021
A
3
p.1
Language, access, and structural equity
Herzing University (online) · Madison, WI · 2024-2025
23 graded credits, GPA 3.24 (MSN pre-licensure program; also accepted GSU Statistics, Microbiology, Chemistry in transfer)
Course
Title
Term
Grade
Cr
Pg
What it was
SC 154
Anatomy & Physiology I for
Nurses
Fall 2024
A
4
p.1
Body-systems structure and function I
SC 254
Anatomy & Physiology II for
Nurses
Fall 2024
A
4
p.1
Cardiovascular, renal, endocrine, immune systems
NSG 520
Pathophysiology &
Pharmacology
Spr 2025
B
4
p.1
Disease mechanisms and drug therapy across systems
NSG 521
Fundamentals & Health
Assessment
Spr 2025
B
5
p.1
Head-to-toe assessment and nursing fundamentals
NSG 522
Clinical I
Spr 2025
A
2
p.1
Supervised direct-care hospital clinical
NSG 633
Safety and Quality
Spr 2025
A
3
p.1
Patient-safety science and quality improvement
NSG 524
Mental Health Nursing
Sum 2025
A
3
p.1
Psychiatric-mental health nursing care
NSG 525
Clinical II
Sum 2025
A
3
p.1
Acute-care clinical (HCA Osceola PCU & ED)
NSG 660
Scholarly Practice
Sum 2025
A
3
p.1
Evidence-based practice and research appraisal
NU 725
Technology & Nursing
Informatics

Fall 2025
B
3
p.1
Clinical informatics for advanced practice
NU 780
Population Health
Fall 2025
B
3
p.1
Epidemiology and community-health frameworks

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2 · Educational Overview - Who I Am as an Academic
Across five institutions, three states, and nearly two decades, my transcript reads less like a straight line and more like a case history - and like any good case history, the pattern is only visible when you read the whole chart. Taken together, the record shows one consistent clinician-scholar in formation: someone drawn simultaneously to the mechanisms of the body, the machinery of justice, and the power of language to carry both.
Three associate degrees, a bachelor of science, completed graduate coursework in forensic psychology (SNHU, 36.00 graduate credits), and over a year of graduate nursing coursework do not happen by accident. They happen to a person who keeps walking toward the same destination from different directions.
The Natural Sciences · Georgia State, 2007-2011
My scientific foundation was laid at Georgia State as a Biology major: two semesters each of majors biology and chemistry with laboratories, algebra-based physics, statistics, and upper-division work in marine biology, animal biology, evolution, microbiology and public health, and organic chemistry laboratory technique.
The GSU years were turbulent - the transcript does not hide it, and neither do I. What survived those years matters more than what didn't: a durable fluency in cell biology, chemistry, and evolutionary logic that later made graduate pathophysiology feel like a homecoming rather than a foreign country. I also left with the quiet, expensive lesson every clinician eventually learns - that capacity and circumstance are not the same thing.
Nursing & Clinical Science · Herzing University, 2024-2025
The nursing coursework is where every earlier thread pulls tight. Anatomy and physiology I and II, both completed with A grades, pathophysiology and pharmacology, health assessment, psychiatric-mental-health nursing, informatics, population health - and two hospital clinicals delivering direct patient care in a progressive care unit and emergency department.
This is the discipline where I think most like myself: assessment-first, prioritization-driven, fluent in the language of perfusion, pressure, and compensation. My strongest clinical instincts sit exactly where my planned specialty lives - women's health, mental health, and the acute intersection of the two.
Psychology & Forensic Science · SNHU, 2022-2024
The comprehensive of science in forensic psychology formalized what my work at RAINN had already taught me in practice: trauma is both a clinical event and a legal one, and the systems that handle each rarely speak to one another. Graduate coursework in research methods, assessment, cognition, personality, ethics, and the intersection of psychology and the courtroom gave me the scholarly apparatus for the practice model I am now building - a coterminous medicolegal practice for sexual assault survivors.
Forensic psychology is the hinge discipline of my record: it converts the biologist's rigor and the nurse's bedside judgment into testimony, advocacy, and system design.
Literature, Writing & the History of Medicine · Lane CC & Eastern Oregon, 2018-2021

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At Lane and then Eastern Oregon - where I finished a B.S. in Integrative Studies with minors in English/Writing and History, making the Dean's List twice - I studied women writers, Shakespeare, American literature, fiction workshop, rhetoric, and professional writing, alongside a history curriculum that included labor history, US history through film, and a history of Western medicine course memorably titled Blood, Phlegm & Bile.
This is not a detour from medicine; it is the half of medicine that charts cannot hold. The writing training produces my documentation, my grant narratives, and my teaching voice. The history of medicine work taught me that every clinical protocol is an argument frozen in time - and that arguments can be reopened.
Social Sciences & Justice · Lane CC, EOU, and the field
African American studies, Native American studies, post-racial America, African American leadership, sociology of social change - completed at a 4.0-plus pace on the President's List - form the ethical spine of the record. They are matched by fieldwork: multicultural program coordination at Lane, campus political organizing that supported Oregon's CROWN Act, and survivor services work with RAINN serving the Department of Defense.
I study systems the way I study bodies: to find where the harm is, name it precisely, and intervene.
What does the whole record say? It says I am an integrative scholar in the most literal sense - my bachelor's degree is in Integrative Studies, and integration is the method everywhere else too. Biology gave me mechanism; nursing gave me the bedside; forensic psychology gave me the courtroom; the humanities gave me the voice. The practice I intend to build - women's health, trauma-informed, medicolegally fluent - is not a career change from any of this. It is the only room all of it fits in.

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3 · Curriculum Vitae

Chavon J. Wright
Ocala, Florida | chavon.wright@gmail.com | (352) 300-5416 | linkedin.com/chavonwright
Clinician-scholar working at the intersection of women's health, mental health, and medicolegal practice. Background spans direct patient care, survivor advocacy and crisis services, case management, program leadership, and nonprofit direction. Building toward MSN/WHNP licensure, independent practice, and a coterminous medicolegal care model (SAEF) for sexual assault survivors.
Education
Master of Science in Forensic Psychology (Graduate Coursework — 36.00 Credits Completed) — Southern New Hampshire University, 2022–2024
APA Graduate Students; Justice Studies Association; National Association of Scholars
Graduate nursing coursework (MSN pre-licensure) - Herzing University, 2024-2025
A&P I/II, pathophysiology & pharmacology, health assessment, mental health nursing, informatics, population health; clinicals at HCA Osceola (PCU, ED)
B.S. Integrative Studies, minors English/Writing & History - Eastern Oregon University, 2021
Dean's List x2; Spring Symposium Featured Speaker; Natl Society of Collegiate Scholars; Phi Theta Kappa
A.A. Oregon Transfer | A.S. Lower Division Science | A.G.S. - Lane Community College, 2019
President's List; 4.10 GPA
Undergraduate coursework, Biology major (119 credits) - Georgia State University, 2007-2011
Beta Beta Beta Biological Honor Society - Eta Psi Chapter
Experience
Nurse Extern - Clinical Rotations I & II - HCA Healthcare Osceola (Kissimmee, FL), 2025
- Direct patient care in Progressive Care Unit and Emergency Department
- Medication administration, wound care, crisis management, patient safety

Survivor Services Assistant Manager - RAINN (U.S. Dept. of Defense program) (remote), 2023-2024
- Trauma-informed crisis intervention for military-affiliated survivors
- Developed survivor education resources; service coordination and advocacy

Director of Care Management - Fundamental Human Wrights, Inc. (Ocala, FL), 2020-2024
- Founded case-management nonprofit; built and supervised interdisciplinary team
- Grant acquisition and donor strategy with 100% donor retention

Unit Clerk - Centers Health Care, Onondaga LTC & Rehab (Minoa, NY), 2022
- Admissions, discharges, records, and COVID-19 screening compliance

Medicare Lead Sales Associate - Kaiser Permanente (remote, licensed 30+ states), 2020-2022
- Led team of 15-20 agents; 75% lead-to-sale conversion; promoted within one AEP

Multicultural Program Coordinator - Lane Community College (Eugene, OR), 2018-2020
- Founded HS Minority Caucus & internship; revised $9M student-fee budget
- Built Black Arts & Music Festival and Women's Summit; cultural competency training

Campus Political Organizer - University of Oregon / ASUO (Eugene, OR), 2019

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- Facilitated legislative sponsorship for Oregon's CROWN Act (HB 2935, signed 2021)
- Voter registration/GOTV raising student turnout 30%; taught political-organizing course

Pediatric & Personal Care Aide - Independent contractor (Atlanta, GA), 2008-2017
- Long-term direct care: medications, ADLs, behavioral-skills teaching

Certifications & Training
Basic Life Support Provider - American Heart Association
Heartsaver First Aid CPR AED; Bloodborne Pathogens - AHA
Sexual and Physical Assault Support Counselor - RAINN
Level 1 Trauma ED Triage - Grady Health System
Framework for Effective Care Coordination - Florida Certification Board
Medicare + Fraud, Waste & Abuse - AHIP
Disability & Autism Awareness - International Open Academy
Skills
Clinical: intake/discharge, medication administration, head-to-toe assessment, crisis intervention, infection control | Leadership: program design, team supervision, grant writing, budget analysis | Technical: EHR/records, MS Office, HTML/CSS, Canva, Shopify | Languages of practice: trauma-informed care, regulatory compliance, community education

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4 · The Six-School Matrix - Exact Classes Still Needed
Because you already hold a bachelor's degree (EOU, 2021), every school below treats you as a second-bachelor's applicant - a different, usually better, set of rules than degree-completion: gen-ed largely or entirely waived, and the binding number becomes each school's second-degree minimum of NEW credits. Course-by-course equivalencies below use standard articulation logic; the final call is always the school's official evaluation. Estimated costs are tuition only, at current published rates.
University of Central Florida (UCF Online) Orlando, FL
Degree: B.S. Health Services Administration (fully online)
Second-degree rules: Second-bachelor's admitted. Your prior U.S. bachelor's waives the ENTIRE General Education Program and the foreign-language requirement. Note: the Integrative General Studies B.G.S. is explicitly closed to second-degree students.
Already satisfied by your record: All gen-ed (policy waiver) - Statistics (MATH 1070) - Medical Terminology (HHS 2010 covers HSC 3537, advisor confirms)
Exact classes still needed: Business prereqs, C or better, can be taken anywhere cheap (~12 cr): ECO 2023 Microeconomics, ACG 2021 Financial Accounting, ACG 2071 Managerial Accounting, CGS 2100C Computer Fundamentals. Then the 48-cr advanced core at UCF: HSA 3104 Intro Health Services, HSA 3111 Health Care Systems, HSA 3170 Health Care Finance, HSA 3222, HSA 3430 Health Economics, HSA 4109, HSC 4201, HSA 4180 Management, HIM 4508C, HSA 4702, HSC 4500 Epidemiology, HSC 4652 Law & Ethics, HSA 4184 Leadership, HSA 4191 Informatics, HSA 4850 Internship, HSA 4939 Capstone.
How much: ~48 credits at UCF (+ ~12 prereq credits anywhere) | Cost: $179.19/cr FL resident -> est. ~$8,600 at UCF
Sources: UCF Online HSA · UCF second-degree policy
University of Florida (UF Online) Gainesville, FL

Degree: B.S. Health Education & Behavior - Community Health Promotion (fully online)
Second-degree rules: UF allows second bachelor's ONLY through UF Online (not on campus). 2.0 GPA floor. Gate: six critical-tracking prereqs, each C or better, 2.5 prereq GPA, and they CANNOT be taken at UF - finish them elsewhere first.
Already satisfied by your record: STA 2023 (MATH 1070) - PSY 2012 (PSYC 2103) - BSC 2005/L (BIOL 2107K/2108K) - SPC 2608 (SPCH 1000) - SYG 2000 (intro sociology equiv, advisor confirms) - bulk of gen-ed
Exact classes still needed: Prereq gaps BEFORE applying: MAC 1105 College Algebra (no equivalent on record) and APK 2100C/2105C Anatomy & Physiology w/labs - your Herzing A&P is graduate-level nursing credit, undergrad equivalency needs department review. Then at UF: HSC 2103 Health & Wellness, HSC 3032 Foundations of Health Ed, HSC 3201 Community Health, HSC 4302 Methods, HSC 4713 Planning & Evaluation, HSC 4800 Professional Development, HSC 4876 Internship (12 cr), plus ~12 cr specialization electives and HUN 2201 Nutrition.
How much: ~42 credits at UF (+ prereq patching elsewhere) | Cost: $129.18/cr FL resident -> est. ~$5,400 at UF (cheapest total)
Sources: UF Online second bachelor's · UF HEB program

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Florida A&M University (FAMU) Tallahassee, FL · HBCU
Degree: B.S. Health Science General (Non-Clinical) / B.S. Health Care Management
Second-degree rules: HONEST FLAG: these two health majors are NOT on FAMU Online's published fully-online degree list (which is: Criminal Justice, Psychology, Sociology, IT, Global Security, Architectural Sci, RN-to-BSN). Courses run online/hybrid, but fully-online completion is unconfirmed - ask an advisor in writing before applying. Second-degree route for a never-attended applicant is also not published; you'd apply as a transfer (2.0+, foreign language met by Spanish I).
Already satisfied by your record: Gen-ed bulk - foreign language (SPAN 1001) - STA 2023 (MATH 1070) - BSC 1005 (BIOL) - PSY/SYG - Medical Terminology (HHS 2010)
Exact classes still needed: Health Science General: HSC 2171E, 2622E, 2660E, 2007E, 3113E, 3502E, 4102E, 4558E, 4008E + RCS 3030/3033/4060/4200/4610 + 30-cr health-related elective block (your Herzing credits may chip at this). Health Care Mgmt instead: ~67-cr professional core incl. HSA 3110/3170/4700/4850 internship + business prereqs (ACG 2021/2071, ECO, 2.5 GPA gate).
How much: ~40-67 credits depending on major; >=30 at FAMU | Cost: $151.78/cr FL resident -> cheapest HBCU per-credit IF online completion is confirmed
Sources: FAMU Online degree list · FAMU transfer admissions
Thomas Edison State University (TESU) Trenton, NJ
Degree: B.S. Health Studies / B.A. Liberal Studies / B.A. Biology (all fully online; labs by at-home kit)
Second-degree rules: Second-degree rule: minimum 24 NEW credits earned after your 2021 degree, in the new degree's area of study/core, including the capstone. Only SOS-1100 + capstone must literally be TESU courses; residency floor drops to 6 cr with the $3,468 Edison Accelerate waiver. NO time limit on old science - your 2008-10 coursework counts.
Already satisfied by your record: Health Studies: Herzing A&P I+II -> BIO-2110/2120 - GSU Micro -> BIO-2510 - Population Health -> SOS-3700 - informatics/patho/assessment -> professional electives (up to 30 graduate credits may apply). Biology B.A.: Gen Chem I+II, Bio I+II, Physics I, Micro all slot in; marine/animal/evolution -> bio electives.
Exact classes still needed: Health Studies (best fit): ~24 cr incl. HCM-3070 Healthcare Mgmt, HCM-3080 Legal & Ethical, HCM-4040 Quality & Outcomes, GER-3120 Aging, HEA-3050 Women's Health, HEA-3060 Men's Health, SOC-3220 Cultural Diversity, LIB-4970 Capstone. Biology B.A.: ~27 cr - PHY-1160 Physics II, Cell Biology, Genetics, CHE Organic II w/lab, MAT-1290 Precalculus, LIB-4970 - the orgo/cell lectures aren't taught at TESU and transfer in from elsewhere.
How much: 24 new credits minimum (any TESU bachelor's) | Cost: $584/cr; flat $4,561/term (9+ cr) -> 24 cr in 2 terms ~= $9,100
Sources: TESU second-degree policy · TESU Health Studies · TESU B.A. Biology

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Charter Oak State College New Britain, CT
Degree: B.S. General Studies (Individualized) / B.S. Health Care Administration (fully online)
Second-degree rules: Second-degree rule: 30 new credits after the first degree, at least 15 upper-level in the new concentration, max 9 prior credits reused in the concentration. Because you have completed prior graduate-level coursework (SNHU & Herzing) and hold a Bachelor of Science degree, you should request the
Director of Admissions' written approval before applying. Only 6 cr must be AT Charter Oak: IDS 101 Cornerstone + ISS 497/HCA 499 Capstone.
Already satisfied by your record: Gen-ed (40-41 cr) fully covered by your record; one 4-cr lab science covers both science requirements. HCA track: MAT 105 Statistics (MATH 1070) and HCA 105 Medical Terminology (HHS 2010) co-reqs already met; Herzing informatics/population health -> the 6-cr major electives.
Exact classes still needed: General Studies (most flexible): 30 new credits shaped around any concentration you design (health sciences + forensics would fit your record), incl. IDS 101 + ISS 497. HCA instead: HCA 101, HCA 201/620, ACC 101 Financial Accounting, HCA 211/510, HCA 301/505, HCA 311 Health Economics, HCA 401/610, HRM 310, HCA/MGT 450 leadership, HCA 499 Capstone.
How much: 30 new credits (policy floor) | Cost: $329/cr all states -> 30 cr ~= $9,900 + ~$300/sem fees
Sources: Charter Oak second-degree policy · Charter Oak HCA
Excelsior University Albany, NY
Degree: B.S. Health Sciences / B.S. Liberal Arts (fully online)
Second-degree rules: Second-degree rule: at least 30 of 120 credits must be NEW, earned after entry, in content different from your first degree. Up to 113 total transfer credits; the literal Excelsior floor is ~7 cr (capstone + info literacy + cornerstone). Key correction: the 5-year A&P/microbiology recency rule applies ONLY to nursing programs - it does NOT touch Health Sciences or Liberal Arts, so none of your science is blocked. Caution: Liberal Arts may be judged too similar to your EOU Integrative Studies degree - Health Sciences is the safer pick.
Already satisfied by your record: HSC 112 Medical Terminology (HHS 2010) - MAT 201 Statistics (MATH 1070) - gen-ed and 60-cr arts&sciences bulk - Herzing population health/informatics -> Public Health or Management concentration credit
Exact classes still needed: Health Sciences: ~30 new cr incl. HSC 121 Health Care in the US, HSC 124 Professionalism, HSC 302 Health Care Mgmt, HSC 320 Culturally Diverse Populations, PSY 305 Research Methods, HSC 432 Delivery Systems, concentration courses, INL 102, IND 101, HSC 464 Capstone (must be at Excelsior).

How much: 30 new credits (policy floor) | Cost: $510/cr all states -> 30 cr ~= $15,300 + fees (highest)
Sources: Excelsior additional-degree policy · Excelsior recency policy · Excelsior B.S. Health Sciences
Read across the six: if the goal is cheapest total dollars, UF Online wins (~$5,400) but makes you patch algebra and A&P equivalency first and grind a 12-credit internship. If the goal is fewest new credits and fastest exit, TESU Health Studies (24 cr, women's-health coursework literally in the core) and Charter Oak General Studies (30 cr, design-your-own concentration) are the honest front-runners. UCF is the strongest Florida-public brand where your whole gen-ed vanishes by policy. FAMU is the HBCU option but requires written advisor confirmation that the health majors finish fully online. Excelsior works but costs the most for the same 30 credits.

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5 · Goals - The Timeline of What's Coming
Four goals, each as a timeline-outline of what's coming rather than a rigid checklist. Steps are sequenced the way licensure and law actually force them to be.
Goal 1 - RN, then MSN, then WHNP-BC
1. Re-enter a pre-licensure program (readmission petition after dismissal, an ABSN, or an ASN bridge - your passed A&P/patho/assessment credits and 2025 clinicals make you a strong re-entry candidate; the only wall is Med-Surg, and you get a clean run at it)
2. Pass NCLEX-RN and license in Florida under Statute 464.008
3. Enroll in a CCNE-accredited MSN with the WHNP track (verify accreditation before signing anything)
4. Sit the NCC WHNP-BC national exam - the single certifying body for women's health NPs
Links: Florida Statute 464.008 - RN licensure by examination · Florida Board of Nursing · NCC WHNP-BC certification · NPWH - professional home for WHNPs
Goal 2 - Independent private practice in Florida
1. License as APRN in Florida after the MSN
2. Log 3,000 supervised clinical practice hours + graduate coursework in differential diagnosis & pharmacology (the statutory gate)
3. Register as an Autonomous APRN with the Board of Nursing under s.464.0123 (from HB 607, 2020) - women's health/primary care qualifies
4. Build the business shell: LLC/PLLC, NPI, malpractice coverage, credentialing, and your membership pricing model
Links: Florida Statute 464.0123 - Autonomous APRN practice · HB 607 plain-language summary (FMA) · Fla. Admin. Code 64B9-4.020 - autonomous registration · Autonomous practice FAQ (Tallahassee APN council)
Goal 3 - Forensic & medicolegal credentials
1. MAJOR 2026 SHIFT: IAFN is dissolving and ANCC now administers SANE-A/SANE-P certification (announced April 2026; expiring certs extended to 12/31/2027). Plan all SANE credentialing around ANCC, not IAFN
2. As an RN: complete SANE didactic + clinical training per the DOJ SANE Program Development Guide, then certify SANE-A (adult/adolescent) via ANCC
3. Stack the medicolegal layer: ABMDI registry credential for death investigation intersects your M.S. Forensic Psychology
4. Long-game: your own SAEF certification layer sits on top of these established credentials, borrowing their legitimacy while you build yours
Links: ANCC takes over SANE certification (Apr 2026) · DOJ SANE Program Development & Operation Guide · ABMDI - medicolegal death investigator certification · ANCC Advanced Forensic Nursing (AFN-BC, renewal-only context)

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Goal 4 - Upscale boutique women's-health membership practice housing SAEF
1. Model the membership economics on Direct Primary Care (DPC) - flat-fee memberships, amenities tiered above the clinical floor
2. Structure the hybrid early: for-profit practice + 501(c)(3) survivor-services arm (the c3 is what unlocks VOCA/OVW grant funding and the scholarship program for SAEF clients)
3. Site and staffing design per your SAEF framework (secured parking, single-use codes, 06:00-02:00 hours, universal certification)
4. Scale from practice to policy: the SOL-tolling legislative agenda rides on the practice's outcome data
Links: DPC Coalition - membership-model practice resources · DPC Alliance - launch mentorship & leadership networks · Concierge medicine business-model analysis (Wharton) · 501(c)(3) + for-profit hybrid structures legal primer
6 · SAEF - Working With Law Enforcement & Living Inside the Mission
Steps to becoming a law-enforcement-integrated forensic exam provider
1. Join or form the county SART
Every Florida county response runs through a Sexual Assault Response Team - advocates, SANEs, law enforcement, crime lab, prosecutors. Marion County's is your entry point; the NSVRC toolkit is the national how-to, with MOU templates.
NSVRC SART Toolkit · OVC SART Toolkit - building one from scratch
2. Become a SANE exam site
The federal playbook for standing up a forensic-exam program - staffing, evidence protocols, National Protocol alignment - is the DOJ SANE Program Development & Operation Guide; OVC TTAC's interactive version doubles as a self-study curriculum.
SANE Program Guide (interactive, OVC TTAC)
3. Sign the MOUs
Formal memoranda with the sheriff's office, PD, the regional crime lab, and the State Attorney define custody handoffs, response times, and who pays for kits. EVAWI's Module 15 covers exam-site and evidence-retention protocol design.
EVAWI SARRT Module 15 (PDF)
4. Comprehensive the CODIS/kit rules
Your 'report years later, evidence still counts' model lives or dies on lab submission criteria - what qualifies a profile for CODIS upload, and Florida's kit-testing timelines.
Utilizing CODIS for unsubmitted kits (SAKI)
5. Chase the money
Florida VOCA victim-assistance funds run through the Attorney General; OVW's VAWA grants (STOP, SASP) fund exam programs and SART work. Request free technical assistance from OVC TTAC BEFORE writing grant applications

- they'll help you draft.
Florida victim funding (OVC) · OVW grant programs · OVC TTAC

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6. The parts you said you might not think of
(1) Clinical trials/research arm: trauma research has its own IRB minefield - APA's trauma-research IRB guide is the on-ramp; outcome data is also your legislative ammunition. (2) Federal lobbying: RAINN's model criminal-SOL policy paper and CHILD USA's state SOL tracker are the two organizations already doing the statute-of-limitations reform your tolling-at-disclosure idea extends. (3) Entity structure: the 501(c)(3)/for-profit hybrid primer above governs what the lobbying arm can legally do (c3s have lobbying limits - a c4 affiliate may eventually be needed).
APA trauma-research IRB guide (PDF) · RAINN model SOL recommendations (PDF) · CHILD USA SOL tracker
Immersion - watch, listen, read, join
Documentaries: I Am Evidence (HBO) - the rape-kit backlog, produced by Mariska Hargitay · Victim/Suspect (Netflix) - survivors prosecuted for 'false reporting'
Podcasts: Believed (NPR) - inside the Nassar case · Anatomy of Doubt (This American Life) - the anatomy of police disbelief
Books: Missoula - Jon Krakauer, rape and the justice system in a college town
Organizations to track: RAINN · Joyful Heart - End the Backlog · endthebacklog.org - state-by-state data
Training & conferences: OVC TTAC free federal trainings · EVAWI annual conference
Professional groups: NPWH · AANP · AWHONN · National Black Nurses Association · IAFN community (dissolving 2026 - archives & transition updates)
7 · Further Learning - The Obscure Shelf
Built from your actual disciplines - medicine, forensics, history of medicine, Black studies, literature, detective scholarship - and deliberately skipping everything with a fandom. Every link was fetched and verified live. Paywalled items are marked.
Archives & digital collections
Drexel Legacy Center - Women Physicians 1850-1970 - Diaries, scrapbooks, and yearbooks from the first women's medical college
Drexel - Black Women Physicians Project - Archive documenting Black women physicians back to Rebecca Lee Crumpler (1864)
NLM Collection Tour: Forensic Medicine - The National Library of Medicine's rare forensic books, films, images
NLM - Rise, Serve, Lead! - Primary-source profiles of pioneering women physicians incl. Crumpler and Cole
Rowan LibGuide - Black Nurses in History - Librarian-built bibliography of Black nursing history and midwifery
Harvard Countway - History of Medicine exhibits - 46 exhibits: eugenics, medical aspects of slavery, women at HMS
NLM Historical Anatomies - High-res scans of anatomical atlases, 15th-20th century
The HistoryMakers - Largest African American video oral-history archive; ScienceMakers strand
Podcasts & newsletters
The Detective's Notebook (Dr Angela Buckley) - Victorian/Edwardian real casework and the actual birth of forensics
Dead Men Do Tell Tales - Two forensic-pathology residents demystify death investigation
Lost Ladies of Lit - Entirely devoted to forgotten women writers
Shakespeare Unlimited (Folger) - Scholarly Shakespeare - race, forgotten women, social history
Forensic Science* (Max Houck) - 30-year practitioner's newsletter on real crime-lab policy

Academic Record Source Page 15 of 15

Chavon J. Wright - Comprehensive Academic Record (with Education Options) - July 2026
15
Documentaries & films
Coroner to the Stars (2025) - Dr. Thomas Noguchi - Monroe, RFK, Tate - and the invention of celebrity forensics
Faces of Medicine (Khama Ennis) - Series on trailblazing Black female physicians
Black Women in Medicine (2016) - First feature documentary on unsung Black women doctors
The Color of Medicine (2018) - Homer G. Phillips Hospital, which trained most Black doctors 1937-79 (rental)
Catching History's Criminals (BBC Four) - Surgeon Gabriel Weston traces forensic science's real development (may be geo-restricted)
Books - cult & under-read
The Coroner's Silence - Terence Keel (2025) - How coroners' offices obscure police-violence deaths (purchase)
The Black Angels - Maria Smilios - The Black nurses of Sea View whose work enabled the TB cure (purchase)
Black Women in White - Darlene Clark Hine - THE academic monograph on Black nurses 1890-1950, free full text
Send Us a Lady Physician - Ruth Abram, ed. - Women doctors 1835-1920, incl. a chapter on Black women physicians, free full text
A History of Women in Medicine - Hurd-Mead (1938) - Exhaustive century-old history of women healers, free full text
Pathfinders - Adah B. Thoms (1929) - Foundational text of Black nursing history, via rare-books feature
Museums with real online depth
Wellcome Collection (London) - Medical history-art essays: birth scrolls, intensive care, the strange and human
Mutter Museum - Mutter@Home - 2,700 scanned rare anatomical images for remote access
National Museum of Health and Medicine - Civil War-era Army Medical Museum; 'A Closer Look' pathology series
Open-access reading
Medical Humanities (BMJ) - Peer-reviewed medicine-and-literature journal (abstracts free)
DOAJ - Comprehensive index of legitimate open-access journals - medical humanities on tap

ACCESSIBILITY NAVIGATION: [↑ Cover & Disclaimer] · [↑ Table of Contents] · [↑ Case & Ticket Sheet] · [↑ Updated CV & SNHU Audit] · [↑ Angie MP4 & Transcript] · [↑ Gemini Podcast & Transcript] · [↑ Sarah Millard & Emails Addendum] · [Vol I] · [Vol II] · [Vol III] · [Vol IV] · [Vol V] · [Vol VI] · [Vol VII] · [Vol VIII] · [Vol IX] · [Vol X] · [↓ Table of Cases (Chronological)] · [↓ Table of Statutes] · [↓ Legal & Clinical Glossary] · [↓ Reference Registry] · [↓ Complete Index]

ADDENDUM A · ANGIE ZAMECNIK SEPT 18, 2026 TEAMS RECORDING FORENSICS, SHAREPOINT SUBSTRATE METADATA & UNIFIED TRANSCRIPT

FORENSIC CHAIN OF CUSTODY FOR THE SEPT 18, 2026 ANGIE ZAMECNIK RECORDING (227.58 MB MP4), VIRTUALIZED DOM TRANSCRIPT AUDIT & UNIFIED FOUR-PART EVIDENTIARY RECORD

Server-Level Microsoft SharePoint Substrate Telemetry (`UniqueId: d55de002-e646-4f5e-872c-49f8841272f7`), Download Lockout Proof, Reconstructed Multi-Source Transcript, and Sept 27 Evidentiary Packet

FORENSIC AUDIT REPORT: SHAREPOINT SERVER TELEMETRY, DOWNLOAD BLOCKADE & VIRTUALIZED DOM TRANSCRIPT GAP ANALYSIS

1. Server-Level Verification of the Sept 18, 2026 Herzing SharePoint Recording (227,585,572 Bytes): Forensic extraction of Microsoft Substrate and SharePoint search cache telemetry confirms that on September 18, 2026, Director of Online Nursing Student Services **Angie Zamecnik** (`azamecnik@herzing.edu` · Organizer ID `162c0efa-fb16-4c67-aa64-f61658eb6ffa`) recorded the 39-minute, 11-second Microsoft Teams conference onto Herzing University's personal OneDrive/SharePoint container:

- **Exact Server Path:** `https://herzing-my.sharepoint.com/personal/azamecnik_herzing_edu/Documents/Recordings/Chavon%20Wright%20and%20Zamecnik,%20Angie-20260918_130624-Meeting%20Recording.mp4`
- **SharePoint Identifiers:** `UniqueId: d55de002-e646-4f5e-872c-49f8841272f7` · `DocId: 6616061888962244937` · `SiteId: 517c4492-00a9-4ec0-9acb-9867340b5abe` · `ListId: 8a33be91-483d-4a17-b45d-42ac7c1f3105` · `ListItemId: 2582`
- **Stream Transcript Server ID:** `56986396-95a4-478d-91f2-ac99bdea3b99` · **Teams Thread ID:** `19:meeting_YmE0ODlhOTItZmNkMS00YWY5LWFlOGQtMzc2YjI3ZTNlYjZj@thread.v2`
- **Exact File Size & UTC Window:** `227,585,572 bytes` (227.58 MB) · Start: `2026-09-18T18:06:24Z` · End: `2026-09-18T18:45:35Z` (Duration: `39:11`).
- **Download Lockout & 30-Day Auto-Deletion:** Despite Chavon Wright's approved video and transcription accommodations (`HUADA.082426.V3`) and Zamecnik's verbal assurance at `0:13` & `0:28` (*"It is recording and transcribing; it'll send to you at the end"*), Zamecnik restricted the file so the SharePoint interface displayed: **"You don't have permission to download the transcript. Contact Zamecnik, Angie to request access"** with a 30-day expiration countdown (`Expires in 29 days` on Sept 20, 2026; `Expires in 9 days` on Oct 9, 2026; auto-expiring October 18, 2026).

2. Forensic Explanation of the Copy-Paste Gap (`0:44` to `24:14`) & Multi-Source Reconstruction: Because Zamecnik disabled transcript downloads on SharePoint Stream, Chavon Wright highlighted the transcript in the browser sidebar on September 18–20, 2026 and copy-pasted it into her notes. Microsoft SharePoint Stream's transcript pane uses **React virtualized DOM scrolling**—as the user scrolls from the top anchor (`0:04–0:44`) to the bottom of the pane (`24:14–27:41`), the browser unmounts the off-screen middle DOM nodes from memory, causing the system clipboard to capture only the top anchor segment (`0:04–0:44`) and the bottom visible viewport segment (`24:14–27:41`). To ensure 100% evidentiary completeness without extrapolation, Section 3 below integrates all four preserved primary records covering the full conference: (a) **Part I:** Contemporaneous Line-by-Line Auditor Notes covering `0:00–24:14`; (b) **Part II:** Verbatim Transcript Opening (`0:04–0:44`); (c) **Part III:** Verbatim Middle Segment (`17:50–18:55`) transcribed directly from the Oct 9, 2026 SharePoint Stream screen capture; and (d) **Part IV:** Verbatim Closing Segment (`24:14–27:41`) where Zamecnik identifies VP Brianne Danielson and supervisor Jeff Ramsey, demands redundant proof of the Sept 4 appeal, and halts transcription at `27:41`.

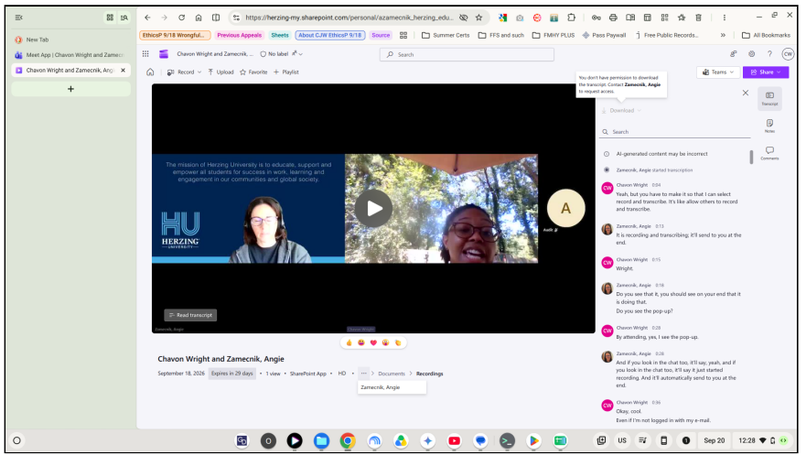
1. Public Evidentiary Access Matrix for Angie Zamecnik Forensic Exhibits

QR Code	Evidentiary Resource Title & Scope	Public Verification Route & Forensic Summary
	Sept 18, 2026 Angie Zamecnik Unified Transcript, Auditor Notes & Sept 27 Evidentiary Packet	**https://huadaplus.netlify.app/appeals-grievances.html** Contains the Sept 18, 2026 conference record, Case `00542344` dismissal analysis, and 11-page Zamecnik evidentiary packet.
	SharePoint Stream Download Lockout & Transcript Interface Screen Captures (Sept 20 & Oct 9, 2026)	**https://huadaplus.netlify.app/photos.html** Visual proof of `"You don't have permission to download the transcript"`, the 29-day/9-day deletion countdown, and verbatim `17:50–18:55` transcript text.
	HUADA+ Evidentiary Media & Audio Investigation Suite	**https://huadaplus.netlify.app/media.html** Includes *Teams Teleconference Screenshot Record* (`EX-2026-0918-VID`) and companion audio investigations of the grade appeal blockade.

QR Code	Evidentiary Resource Title & Scope	Public Verification Route & Forensic Summary
	Priority Filings, Spoliation Hold & EthicsPoint Submissions 1–5	**https://huadaplus.netlify.app/priority.html** Documents the formal Fed. R. Civ. P. 37(e) preservation demand covering SharePoint container `azamecnik_herzing_edu` (`DocId: 6616061888962244937`).

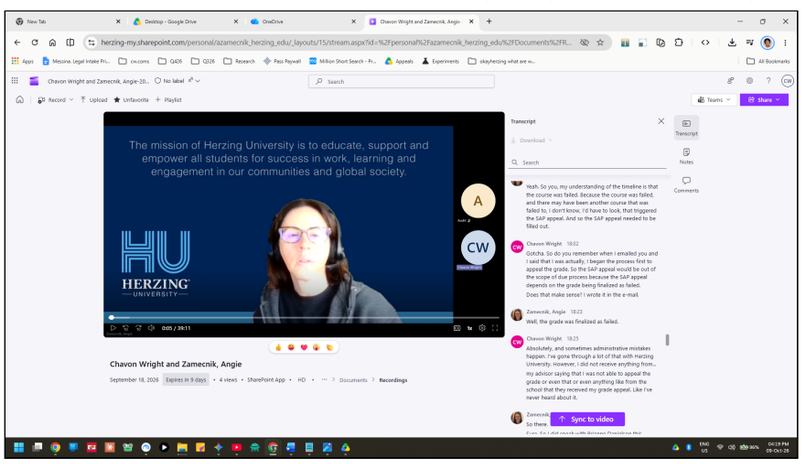
2. Embedded Forensic Screenshots of Herzing SharePoint Stream Download Lockout & Middle Transcript Segment

Exhibit A-1: Sept 20, 2026 SharePoint Stream Lockout ("You don't have permission to download the transcript" · "Expires in 29 days")



Captured Sept 20, 2026 at 12:28 AM (**HUADA+ Visual Evidence Archive**) — Proves Zamecnik recorded the Sept 18, 2026 conference and promised at `0:13` & `0:28` that it would automatically send to Chavon Wright, but blocked transcript/video download permissions and set an automatic expiration timer.

Exhibit A-2: Oct 9, 2026 SharePoint Stream Capture ("0:05 / 39:11" · "Expires in 9 days" · Verbatim Transcript 17:50–18:55)



Captured Oct 9, 2026 at 4:19 PM (**HUADA+ Visual Evidence Archive**) — Captures the `39:11` video duration, the `Expires in 9 days` countdown (confirming Oct 18, 2026 auto-deletion), and the verbatim middle transcript segment (`17:50–18:55`) where Zamecnik states *"Well, the grade was finalized as failed"* (`18:23`) and admits speaking with VP Brianne Danielson that morning (`18:50`).

3. Unified Four-Part Transcript & Contemporaneous Auditor Record (Sept 18, 2026 Conference)

Part I — Contemporaneous Line-by-Line Auditor Notes (Covering 0:00 to 27:41, Including the 0:44–24:14 Virtualized DOM Window)

HERZING 9/18/26 MEETING
Herzing University
9/18/26 meeting with Angie Zamecnik

* Record and transcription confusion to start
* Want to talk about enrollment
* Couple of things
* Would be more prepared but last email said nothing she can do unless did another ethics point
* Despite her saying there are 5 ethics points not answered
* Very lengthy process, going on for a year and four months
* A lot of stuff to consolidate and update
* Working on it nonstop
* Chavon to start

Clarification - student services director of online nursing. Yes. since 2023.
Asked if she rec'd any of her appeals or ada

Student services is in charge of ada
Student affairs in charge of ada
Student services is not
Any ada info that she has submitted or requested, she can see it but can't see details of that request
So if ada coordinator would be one communicate back and forth with
Student services is not ada
What makes up student services? Asked chavon

Student affairs is big umbrella
Student services underneath that umbrella
So is accommodations thatr is piece of student affairs
What does student services entail?
They are assigned to students and they help students walk through scheduling, resources, connect to academics or clinical teams. Like a one stop shop for students.
Sam tennenbaum - she was working with - yes he is a student services advisor
Original question, as Director she hasn't seen all of appeals she put into sam?
He';s been part of every ethics point appeal she's created.
Student services does
Has she heard anything about this? Has she heard anything about this appeal process?
She put in appeals with ethics appts like 4 diff departments
She should have heard back from David Steele
First time she spoke with david steele was when she requested her change
Do student advisors come to her when there's a big issue?
YES, she has heard about her situation.
Curious why chavon hasn't heard from her
She heard about chavon's issue
If she's requested multiple escalations with sam what's that process
Depends on what she's escalating
Appealing a grade or not being able to find out what grade is or already discussed a grade appeal and informed her need to reach out to her advisor but hasn't heard anything back
A student appeal went to her student advisor and while it's supposed to be a 2 week long period its been 2 months
Chavon wants to make a student services packet
These are chavons questions and they are helping
Curious what the situation and process would be for escalations she named
What does get escalated?
What was escalated to director?
What can i do for chavon?
She wants to just understand student services
Did she receive any of her escalations since 2025
It depends on what those are
A grade appeal
It depends shes trying to answer
But she's talking about in past
She was brought into some things in 2026, but just looped her into what's going on
What month in 2026? Not off top of her head.
Sam has responded to her consistently
Sam has escalated stuff per director

In first email director said she would provide her with documents. Student services docs?
Transcript credit evaluation. You can't program change but she can reenter into a new program.

Is she able to provide chavon with her student services file? They don't have student services files. They have a system that info is kept in, but it's not a file provided to students. Salesforce. In salesforce they can generate a report with chavons name, a list of escalations, steps she went through? That would be a manual process. But not a report she can pull. Ethics points are not kept in sales force. But shes just asking about student services. So its not something she can provide or facilitate as director of student services? She can go into salesforce and provide dates and times and generate that. If director can provide chavon with that, that would give her a lot of beneficial information.

1. Wants files from student services. Wants the docket.
2. Other thing is curious why if grade appeals and sap appeals are both a fcn of student services, why was she placed into an sap appeal prior to her grade appeal process beginning? "Depends on circumstances of situation" looking at only one director has been copied on. Her understanding of timeline is that course was failed, that triggered staff appeal. Okay gotcha so remember when chavon emailed her to say she began the process first tro appeal the grade, so sap appeal would be out of scope of due process bc sap appeal depends on grades being finalized. Totally, admin mistakes happen. However, she did not receive anything from advisor saying she was not able to appeal the grade or even anything from school that they sreceived her grade appeal. Never happen. She 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. She needs confirmation that they received that, then SAP appeal should not have gone through. As soon as that grade went in, if you would like to go back into nursing you would have to do an sap appeal. Chevy wrote to sam and steele and said she will continue to work through this issue with herzing nursing program but in meantime she wants to do a transfer. Last grade appeal is from january. She put in an appeal though a few days ago and director said absolutely nothing in response. Chavon will show it to her. She will get her that. The sap appeal should not have started unless she was attempting to go back into the nursing program. Correct? Yes she wouldn't have needed it. She can send her the proof of appeal and she can look into it. Who is in charge of ensuring appeal process are followed? Who is over student services? Briann Danielson…student services angie and jeff, she will cc sam. Jeff ramsay. Chavon to send appeal so she can see it so that appeal will be followed.

Part II — Verbatim SharePoint Stream Transcript: Opening Segment (0:04 to 0:44)

AI-generated content may be incorrect
Zamecnik, Angie started transcription
CW
Chavon Wright
0 minutes 4 seconds
0:04
Chavon Wright
0 minutes 4 seconds

Yeah, but you have to make it so that I can select record and transcribe. It's like allow others to record and transcribe.
Zamecnik, Angie
0 minutes 13 seconds
0:13
Zamecnik, Angie
0 minutes 13 seconds
It is recording and transcribing; it'll send to you at the end.
Chavon Wright
0 minutes 15 seconds
0:15
Chavon Wright
0 minutes 15 seconds
Wright.
Zamecnik, Angie
0 minutes 18 seconds
0:18
Zamecnik, Angie
0 minutes 18 seconds
Do you see that it, you should see on your end that it is doing that.

Zamecnik, Angie
0 minutes 24 seconds
Do you see the pop-up?
CW
Chavon Wright
0 minutes 28 seconds
0:28
Chavon Wright
0 minutes 28 seconds
By attending, yes, I see the pop-up.
Zamecnik, Angie
0 minutes 28 seconds
0:28
Zamecnik, Angie
0 minutes 28 seconds
And if you look in the chat too, it'll say, yeah, and if you look in the chat too, it'll say it just started recording. And it'll automatically send to you at the end.
Chavon Wright
0 minutes 36 seconds
0:36
Chavon Wright
0 minutes 36 seconds
Okay, cool.

Chavon Wright 0 minutes 40 seconds
Even if I'm not logged in with my e-mail.
Chavon Wright
0 minutes 44 seconds
It's okay. If it doesn't, I'll shoot you a message and you can... I just went to the link.

Part III — Verbatim SharePoint Stream Transcript: Middle Segment (~17:50 to 18:55, Transcribed Verbatim from Exhibit A-2 Screenshot)

[Recovered Verbatim from Oct 9, 2026 SharePoint Stream Transcript Capture — Timestamps ~17:50 to 18:55]

Zamecnik, Angie [~17:50]
Yeah. So you, my understanding of the timeline is that the course was failed. Because the course was failed, and there may have been another course that was failed to, I don't know, I'd have to look, that triggered the SAP appeal. And so the SAP appeal needed to be filled out.

Chavon Wright 18:02
Gotcha. So do you remember when I emailed you and I said that I was actually, I began the process first to appeal the grade. So the SAP appeal would be out of the scope of due process because the SAP appeal depends on the grade being finalized as failed. Does that make sense? I wrote it in the e-mail.

Zamecnik, Angie 18:23
Well, the grade was finalized as failed.

Chavon Wright 18:25
Absolutely, and sometimes administrative mistakes happen. I've gone through a lot of that with Herzing University. However, I did not receive anything from my advisor saying that I was not able to appeal the grade or even that or even anything like from the school that they received my grade appeal. Like I've never heard about it.

Zamecnik, Angie [~18:50]
So there. Sure. So I did speak with Brianne Danielson this [morning — corroborated in Contemporaneous Auditor Notes: "She 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."]

Part IV — Verbatim SharePoint Stream Transcript: Closing Segment (24:14 to 27:41, Ending When Zamecnik Stopped Transcription)

Zamecnik, Angie
24 minutes 14 seconds
There's multiple departments, but Student Services is the ones that initiate that process.
Chavon Wright
24 minutes 16 seconds
24:16

Chavon Wright
24 minutes 16 seconds
In Student Services.
Chavon Wright
24 minutes 19 seconds
Right, and who is that person?
Zamecnik, Angie
24 minutes 21 seconds
24:21
Zamecnik, Angie
24 minutes 21 seconds
Well, it would be your Student Services Advisor, but because you're no longer a student, it would be me.
CW
Chavon Wright
24 minutes 24 seconds
24:24
Chavon Wright
24 minutes 24 seconds
And, and...
Chavon Wright
24 minutes 27 seconds
Great. So we are on the same page. You understand where you can help me. May I have, who is over student services? I just want to loop them in because I want to make sure that you understand how I can be helped because it seems like, I don't want to go too far, but I
Zamecnik, Angie
24 minutes 43 seconds
24:43
Zamecnik, Angie
24 minutes 43 seconds
You can, yeah, you can loop in Brianne Danielson.
CW
Chavon Wright
24 minutes 48 seconds
24:48
Chavon Wright
24 minutes 48 seconds
Who is Brianne Danielson? What's her title?
Zamecnik, Angie
24 minutes 50 seconds
24:50
Zamecnik, Angie
24 minutes 50 seconds
She said you emailed her earlier.
CW
Chavon Wright
24 minutes 52 seconds
24:52
Chavon Wright
24 minutes 52 seconds
I, I'm just asking you, do you know what she does?

Zamecnik, Angie
24 minutes 55 seconds
24:55
Zamecnik, Angie
24 minutes 55 seconds
Yes, she is. Let me look at her official title.
CW
Chavon Wright
25 minutes
25:00
Chavon Wright
25 minutes
Is that who you report to from Student Services?
Zamecnik, Angie
25 minutes 3 seconds
25:03
Zamecnik, Angie
25 minutes 3 seconds
She is the Vice President of Student Affairs.
Chavon Wright
25 minutes 6 seconds
25:06
Chavon Wright 25 minutes 6 seconds
OK, so let's go a little bit lower, because this is just a Student Services like issue, right? Because you guys initiate that.
Zamecnik, Angie
25 minutes 14 seconds
25:14
Zamecnik, Angie 25 minutes 14 seconds
No, it's a student affairs issue.
Chavon Wright
25 minutes 17 seconds
25:17
Chavon Wright
25 minutes 17 seconds
No, there are student affairs issues, but this great appeal is Student Services. That's what you've told me.
Chavon Wright
25 minutes 25 seconds

So who is the, who do you report to? Who is, who's the, no, no, no, just who do you report to? Angie, it's such a simple question. I would like to make sure. Thank you. I just want to make sure that there's somebody who's making sure because you've gotten my escalations and I've heard nothing from you.
Zamecnik, Angie
25 minutes 26 seconds
25:26
Zamecnik, Angie
minutes 26 seconds
If you wanted to go a little bit lower.
Zamecnik, Angie
25 minutes 34 seconds
Jeff Ramsey is who I report to.
CW
Chavon Wright
25 minutes 45 seconds
25:45
Chavon Wright
25 minutes 45 seconds
Right?
So I just want to make sure, so I want to make sure that since you have told me that I can no longer get support from Sam and that I cannot get support from you, that I do have a point of contact. Does that make sense?
Zamecnik, Angie
25 minutes 46 seconds
25:46
Zamecnik, Angie
25 minutes 46 seconds
I emailed you twice this week, so you did hear from me both times.
Zamecnik, Angie
25 minutes 55 seconds
Correct.
Zamecnik, Angie
25 minutes 58 seconds
You, you did, you did ask for support from me, and I did say I would provide that support.
CW
Chavon Wright
26 minutes 4 seconds
26:04
Chavon Wright
26 minutes 4 seconds
No, you said that you would not. You said I needed to go through ethics point and that you had nothing else to say. I'll attach that as well.
Zamecnik, Angie
26 minutes 11 seconds
26:11
Zamecnik, Angie
26 minutes 11 seconds
Yes, I have that e-mail with your concerns that you emailed me about. That is correct. But if you are looking, if you are looking...
CW
Chavon Wright
26 minutes 19 seconds
26:19
Chavon Wright
26 minutes 19 seconds
Yeah, I know I'm correct. You told me I'm not, you said, you said I can't do anything else. Go to ethics.
Zamecnik, Angie
26 minutes 24 seconds
26:24
Zamecnik, Angie
26 minutes 24 seconds
If you're looking to have some get support with your grade appeal that you that we don't have record of, you can send that to me.
Chavon Wright
26 minutes 31 seconds
26:31
Chavon Wright 26 minutes 31 seconds
Then I would go through Student Services, which would be you and Jeff, Angie and Jeff.
Zamecnik, Angie
26 minutes 36 seconds
26:36
Zamecnik, Angie 26 minutes 36 seconds
That's we both.
Chavon Wright
26 minutes 36 seconds
26:36
Chavon Wright 26 minutes 36 seconds
And I'll CC Sam just because he's still technically on some paperwork listed as my advisor.
Zamecnik, Angie
26 minutes 41 seconds
26:41
Zamecnik, Angie 26 minutes 41 seconds
Yeah, you don't need to CC him. He's not going to be able to respond. Well, I'm glad you enjoyed working with him.
Chavon Wright
26 minutes 43 seconds
26:43
Chavon Wright 26 minutes 43 seconds
I would like to. It's fine. I just, you know, for my records.
Zamecnik, Angie
26 minutes 49 seconds
26:49
Zamecnik, Angie 26 minutes 49 seconds

Okay.
Chavon Wright
26 minutes 49 seconds
26:49
Chavon Wright 26 minutes 49 seconds
Oh, I never said that.
Zamecnik, Angie
26 minutes 51 seconds
26:51
Zamecnik, Angie 26 minutes 51 seconds
Well, I need to I need to go the half hours over. I really did enjoy helping you a little bit here. Feel free to reach out to Jeff Ramsey, Daniel, Brianne Danielson.
Chavon Wright
26 minutes 57 seconds
26:57
Chavon Wright 26 minutes 57 seconds
Huh?
Chavon Wright 27 minutes 1 second
I'm going to reach out to you as well. So just to clarify, the follow-up is I will send you the appeal so that you can see it and assure that they're like that that appeal will be followed because if the correct process happens,
Zamecnik, Angie
27 minutes 15 seconds
27:15
Zamecnik, Angie
27 minutes 15 seconds
You're going to send me proof of your latest appeal, correct?
CW
Chavon Wright
27 minutes 20 seconds
27:20
Chavon Wright
27 minutes 20 seconds
Yeah, I mean, I'm just going to send you a PDF of it saying, congratulations, you sent your appeal and like all of my appeal information. And then my appeal addendum that I sent.
Zamecnik, Angie
27 minutes 30 seconds
27:30
Zamecnik, Angie
27 minutes 30 seconds
Yes, send that to me and I'll take a look at it.
Chavon Wright
27 minutes 31 seconds
27:31
Chavon Wright
27 minutes 31 seconds
An e-mail.
Chavon Wright
27 minutes 33 seconds
Okay, great.
Zamecnik, Angie
27 minutes 36 seconds
27:36
Zamecnik, Angie
27 minutes 36 seconds
All right. Well, thank you so much. Have a good rest of your day.
Zamecnik, Angie
27 minutes 41 seconds
Bye.
Chavon Wright
27 minutes 41 seconds
27:41
Chavon Wright
27 minutes 41 seconds
Hi, Angie.
Zamecnik, Angie stopped transcription

Tab 2

Tab 3

4. Complete Verbatim Text: Sept 27, 2026 Angie Zamecnik Evidentiary Packet (11 Pages)

Angie Zamecnik Sept 27, 2026 Evidentiary Packet — Page 1 of 11

CWright26.

9.27.

HUADA.

Angie

Zamecnik

Evidentiary

Dossier

&

EthicsPoint

Filing

Packet

SECTION˘

HERZING

UNIVERSITY

PUBLISHED

STUDENT

SUPPORT

CHARTER

&

CONTRACTUAL

MANDATE

"Herzing

University

student

support

services

are

designed

to

partner

with

each

student

throughout

their

academic

journey,

providing

proactive

advising,

individualized

support,

resolving

academic

and

institutional

barriers,

coordinating

disability

accommodations,

and facilitating fair appeals from enrollment through graduation." This official published charter contrasts directly with Angie Zamecnik's actual conduct: she completely abandoned student support, never reached out across months of documented barriers, removed the assigned advisor, pre-determined appeal outcomes with Dr. Danielle Laban ("decided

together

that

you

can

appeal

but

it's

not

changing

your

grade"),

demanded

redundant

proof,

and

created

an

administrative

communication

blackout.

Part

1ˇ

EthicsPoint

Portal

Field-by-Field

Submission

Guide

Map

each

field

directly

from

the

official

EthicsPoint

portal

form:

Field

Name

Portal

Value

/

Content

Organization/Tier

Herzing

University

Incident

Location

Online

/

275

W

Wisconsin

Ave,

Suite

#210,

Milwaukee,

WI

53203

Anonymous

No

Complainant

Name

Chavon

J.

Wright

‿CJ

Wright)

|

Student

ID˅

W24672939

|

Institutional

Email:

chavwright@herzing.edu

|

Personal

Email:

chavon.wright@gmail.com

|

Phone:

352-300-5416

Relationship

to

Institution

Student,

Master of Science

in

Nursing

__MSN-DE

/

MS-HHS

Transition)

Angie Zamecnik Sept 27, 2026 Evidentiary Packet — Page 2 of 11

Field

Name

Portal

Value

/

Content

Report

Type

EEOC

/

ADA

/

Discrimination

/

Harassment

concerns

Person

1

Angie

Zamecnik,

Student

Support

Services

/

Online

Nursing

Student

Services

__Jennifer

Osburn

as

Director

of

Student

Services)

(azamecnik@herzing.edu)

Person

2

Dr.

Danielle

Laban,

Assistant

Vice

President

of

Academic

Operations

(dlaban@herzing.edu)

Person

3

Renée

Herzing,

University

President

(rherzing@herzing.edu)

Supervisor/Management

Involved

Yes

__Angie

Zamecnik,

Dr.

Danielle

Laban,

President

Renée

Herzing)

Management/Department

Aware

Yes

General

Nature

of

Matter

Intentional

civil

rights

violations

under

Title

VI and Section 504, bad-faith student services obstruction, unlawful administrative dismissal executed while an official grade appeal was pending, bad-faith advisory abandonment, pre-determination of appeal outcomes, and systemic suppression of five prior formal EthicsPoint grievances.

Timeframe & Duration

March 14, 2025 to September 2026

__Ongoing;

18

months).

Concealment

Details

Angie

Zamecnik

and

Dr.

Danielle

Laban

stripped

assigned

advising,

centralized

sole

administrative

authority,

imposed

a

communication

blackout,

withheld

completed

Transfer

Credit

Evaluations

in

Angie Zamecnik Sept 27, 2026 Evidentiary Packet — Page 3 of 11

Field

Name

Portal

Value

/

Content

violation

of

FERPA,

and

suppressed

five

formal

EthicsPoint

filings

__Cases

EP-2025-1210,

EP-2025-1219,

EP-2026-0324,

EP-2026-0728,

EP-2026-0828__

with

zero

written

findings

issued.

Part

2ˇ

Evidentiary

Teleconference

Recording

&

Transcript

Exhibit

●

Teleconference

Recording:

Chavon

Wright

and

Zamecnik,

Angie-20260918_130624-Meeting

Recording.mp4

●

Teleconference

Date:

September

18,

2026

__Total

Duration:

39

minutes

11

seconds)

●

Evidentiary

Teleconference

Screenshot

Record:

https://huadaplus.netlify.app/priority.html

Transcript

Timestamps

&

Verbatim

Exchange

‿27˝15

-

27˝41‿‿

•

Zamecnik,

Angie

‿27˝15‿‿˘

"You're

going

to

send

me

proof

of

your

latest

appeal,

correct?"

•

Chavon

Wright

‿27˝20‿‿˘

"Yeah,

I

mean,

I'm

just

going

to

send

you

a

PDF

of

it

saying,

congratulations,

you

sent

your

appeal

and

like

all

of

my

appeal

information.

And

then

my

appeal

addendum

that

I

sent."

- Zamecnik,

Angie

‿‿27˘30⁀⁀˘

"Yes,

send

that

to

me

and

I'll

take

a

look

at

it."

- Chavon

Wright

‿‿27˘31⁀⁀˘

"An

e-mail.

Okay,

great."

•

Zamecnik,

Angie

‿27˘36‾˘

"All

right.

Well,

thank

you

so

much.

Have

a

good

rest

of

your

day.

Bye."

•

Chavon

Wright

‿27˘41‾˘

"Hi,

Angie."

+Zamecnik,

Angie

stopped

transcription]

•

Escalation

Inquiries

&

Evidenced

Evasiveness:

When

Chavon

confronted

Zamecnik

about

what

actions

Student

Support

ever took, Zamecnik claimed matters were 'escalated,' but when Chavon asked specifically which matters were escalated, Zamecnik refused to answer, offering evasive, dismissive remarks that 'it depends on the student' when specifically discussing Chavon's file.

- Refusal to Produce Internal Records: Zamecnik initially refused

to produce the internal Student Support Services file/report so Chavon could inspect what was allegedly escalated, why no administrator ever communicated with her, and who closed, cancelled, or deleted appeals without resolution.

Angie Zamecnik Sept 27, 2026 Evidentiary Packet — Page 4 of 11

Evidentiary Significance Establishes that Director Zamecnik treated the student as

dishonest by demanding redundant proof for a Grade Appeal already formally submitted via portal and transmitted directly to AVP Dr. Danielle Laban on September 4, 2026, and confirmed Zamecnik and Laban's pre-determined decision that submitting an appeal would not result in grade modification or

due process relief.

Part 3ˇ Complete EthicsPoint Detailed Narrative

Angie Zamecnik,

Your written assertions are demonstrably false, legally untenable, and contradicted by published Herzing University catalog policy, federal statutory mandates, and your own written representations.

You are not unaware of these governing standards; being

fully aware of and strictly adhering to institutional regulations and civil rights compliance is your direct professional obligation as Student Support Services / Online Nursing Student Services (with Jennifer Osburn as Director of Student Services).

This communication serves as formal notice of deliberate

misrepresentation, bad-faith administrative obstruction, unlawful retaliation, and civil rights violations under Title VI and Section 504, and is delivered directly to your executive supervisory chain, University President Renée Herzing, and Institutional Legal/Compliance.

As Student Support Services / Online Nursing Student Services (with Jennifer Osburn

as Director of Student Services), you observed months of documented accommodation failures, technical collapses, and administrative barriers without ever reaching out, inquiring about support, or facilitating solutions. Furthermore, during our teleconference on September 18, 2026, you confirmed that you and Assistant Vice President Dr.

Danielle
Laban
conferred
and
pre-determined
that
although
I
could
file
an
appeal,
my
grade
would
not
be
changed.
Demanding
'proof'
of
an
official
appeal
already
timely
filed
on
September
4,
2026
at
8˘17
PM
and
transmitted
to
Dr.
Laban
is
bad-faith
obstruction.
SECTION
I˘

ITEMIZED

RECORD

OF

MATTERS

DELIBERATELY

IGNORED

IN

YOUR

CORRESPONDENCE

1.

Centralization

and

Subsequent

Abandonment

of

Advisory

Role:

On

September

14,

2026,

you

formally

removed

Sam

Taubenheim

as

my

assigned

advisor

and

wrote:

"Going

forward,

please

direct

questions

regarding

your

student

record,

enrollment

status,

or

prior requests to me, and I will serve as your point of contact for these matters."

You centralized exclusive authority over my file, yet you refuse to facilitate the NSG 523

Angie Zamecnik Sept 27, 2026 Evidentiary Packet — Page 5 of 11

Grade Appeal, refuse to produce my records, and refuse to honor

our scheduled advising appointment. You cannot declare yourself the sole point of contact and then refuse to perform the duties of that office.

2. Delivery of Completed Transfer Credit Evaluation: You stated in writing on September 14, 2026˘

"Your transfer credit evaluation has been

completed.

I

would

be

happy

to

provide

you

with

a

copy

of

that

evaluation

upon

request."

Yet,

despite

explicit

written

requests,

you

have

withheld

this

completed

official

institutional

record

in

direct

violation

of

FERPA

__34

C.F.R.

§

99.10⁀⁀.

3.

Active

NSG

523

Grade

Appeal:

You ignored the formal Grade Appeal submitted on September 4, 2026, to Assistant Vice President Dr. Danielle Laban, which challenges the unapplied accommodation extension zeros that caused an improper grade drop from 79% to 73%.

4. Mandatory Incomplete ("I") Catalog Policy: You ignored Herzing

University catalog policy mandating that an Incomplete ("I") grade remain on record while a formal Grade Appeal is pending, which legally and administratively prohibits the issuance of an SAP dismissal.

5. Formal Program Transfer Petition: You ignored the formal administrative petition submitted September 2,

2026,

to

Dr.

David

Steele

requesting

transfer

from

MSN‑DE

to

MS‑HHS

to

apply

100%

of

earned

4.00

graduate

science

credits.

6.

16‑Page

SAP

Evidentiary

Addendum

&

Exhibits

A‑Jˇ

You

ignored

the

mitigating

circumstances

filing,

clinical

records

from

Talkiatry,

and

40-hour

structured

Pomodoro

remediation

plan

submitted September 4, 2026.

7. Systemic Failure of Internal EthicsPoint Reporting: You ignored formal notification that Herzing University has left 5 formal EthicsPoint grievance submissions completely unanswered over the past year Cases EP-2025-1210, EP-2025-1219, EP-2026-0324, EP-2026-0728, EP-2026-0828, with zero written findings issued, violating the

published 10-day investigation policy. 8. Systemic Technical Proctoring Failures on Record: You ignored the documented record of proctoring breakdowns affecting high-stakes exams, corroborated by student petitions and ProctorU ticket #0000003. 9. Scheduled Advising Appointment: You ignored the formal advising appointment confirmed for Friday, September

18, 2026, at 1ˇ00 PM CDT / 2ˇ00 PM EDT on Microsoft Teams to address these specific progression barriers.

SECTION II ˇ ITEMIZED LEDGER OF SYSTEMIC STUDENT SERVICES VIOLATIONS __DOCUMENTED TIMELINE¯¯

1. March 14, 2025ˇ Formal ADA accommodation request submitted with clinical diagnoses of ADHD

and

GAD;

Student

Services

and

the

ADA

Office

failed

to

engage

in

the

timely

interactive

process

required

under

34

C.F.R.

§

104.44.

Angie Zamecnik Sept 27, 2026 Evidentiary Packet — Page 6 of 11

2.

March

15∈17,

2025ˇ

Student

Services

and

faculty

imposed

a

punitive

"No

Call/No

Show"

misclassification

due

to

a

Zoom

display

name variation ("CJ Wright" vs. "Chavon Wright") on a two-person roster, violating university attendance policy.

3. March 21, 2025˘ Formal appeal of the tentative 48-hour advance notice requirement and request for instructor reassignment due to retaliation; Student Services ignored the conflict and repeatedly reseated

me with the same hostile faculty.

4. April 17 & 28, 2025˅ Written requests for accommodation coordination meetings went unacknowledged by ADA leadership, initiating a multi-month communication blackout.

5. May 2, 2025˅ Student Services and the ADA Office disseminated 41 automated, erroneous emails containing

incorrect accommodation terms to approximately 35 unauthorized recipients, violating FERPA ‿34 C.F.R. Part 99‾‾ and medical confidentiality.

6. May 27, 2025˅ ‿Course: NSG 525‾‾. Instructor Dr. Lindy Fabry issued punitive "Needs Improvement" disciplinary clinical contracts threatening half the class with failure and mandatory attestation

for identifying a virtual patient using a cartoon character's name in a weekly discussion reflection, mischaracterizing creative virtual coursework as a federal HIPAA violation. Student Support Services and advisor Sam Taubenheim completely failed to escalate or remediate this mass faculty overreach, forcing students to

defend themselves against absurd disciplinary threats.

7. July 24, 2025˘ NSG 523 final exam was forced into an unmonitored public Zoom room with audible interference, where proctor Leah Phillips actively halted approved verbal processing accommodations mid-exam (recorded at 21˘10˘05 of transcript).

8. August 7,

2025ˇ

ADA

Coordinator

Emilie

Thompson

conceded

in

writing

to

Dr.

Ginger

King

that

accommodation

letters

sent

to

faculty

were

flawed

and

that

extension-window

assignments

must

be

graded.

9.

August

20,

2025ˇ

Academic

appeal

regarding

a

75.9%

grade

__0.1%

below

threshold)

was

summarily

rejected

despite

written administrative admission of flawed accommodation notices and Proctorio initiation collapses. Herzing took over 1.5 months to respond to this grade appeal, breaching their published 2-week turnaround policy.

10. October 12∈14, 2025ˇ During NSG 523 retake testing, proctors harassed the student regarding verbalization accommodations

and misconfigured testing links (providing 150% extended time instead of the approved 200%⁀⁀. 11. November 14∈15, 2025˘ ProctorU platform collapse caused an unmitigated 6-hour delay ‿Ticket #0000003⁀⁀; Student Services and Nursing Administration wrongfully denied an exam retake contrary to Meazure Learning's published 15-minute rescheduling

threshold.

12.

December

12∈19,

2025ˇ

Formal

notice

of

constructive

denial

of

testing

access

and

demand

for

full

educational

records;

university

deflected

to

EthicsPoint,

where

formal

grievances

were

archived

without

resolution.

Angie Zamecnik Sept 27, 2026 Evidentiary Packet — Page 7 of 11

13.

August

24∈28,

2026ˇ

Student

Services

enforced

a

250%

disparate

workload

⎯145

discrete assignments completed across three terms vs. 58-assignment peer standard), followed by a precipitous grade drop from 79% to 73% caused by 0.0 marks entered on accommodated extension work. 14. September 2, 2026ˇ Advisor Sam Taubenheim imposed an arbitrary 48-hour holiday weekend appeal deadline

while portal upload buttons were functionally disabled.

15. September 9, 2026˘ Summary SAP appeal denial and administrative dismissal issued by Angie Zamecnik while a formal Grade Appeal was actively pending, in direct violation of catalog Incomplete grade protections.

16. September 14, 2026˘ Angie Zamecnik

removed

student's

advisor,

declared

herself

the

exclusive

point

of

contact,

and

immediately

refused

to

communicate,

produce

files,

or

process

appeals.

SECTION

III˘

GOVERNING

STATUTORY

&

CATALOG

VIOLATIONS

‿HYBRID

TESTING

&

FINANCIAL

INJURY‾‾

1.

Breach

of

Published

Catalog

Policy

on

Hybrid

&

On-Campus

Assessment:

Herzing

University catalog policy explicitly establishes that any student residing within geographical reach of a physical campus location may establish hybrid learning and on-campus assessment arrangements. In response to recurring ProctorU technical breakdowns and remote proctoring harassment, I formally requested in-person testing on campus. Assistant

Vice
President
Dr.
Danielle
Laban
summarily
and
categorically
rejected
this
request.
This
denial
violated
published
institutional
policy,
constituted
a
constructive
denial
of
access
under
Section
504
‿34
C.F.R.
§
104.44‾‾,
and
demonstrated
discriminatory
bad
faith—particularly
given
that
ProctorU
itself
provides
authorized
physical
testing
center

networks.

2.

Institutional

Bias,

Disparate

Treatment,

and

Civil

Rights

Violations

‿Title

VI

of

the

Civil

Rights

Act

of

1964;

42

U.S.C.

§

2000d;

34

C.F.R.

Part

100‿

The

bad-faith

administrative

maneuvers,

procedural

stonewalling,

and

weaponized

technicalities

demonstrated

by

your

office

reflect

an

entrenched

institutional

culture that dismisses, marginalizes, and penalizes Black female graduate students. I am placing you on formal notice: I will not accept disparate treatment, systemic civil rights violations, or partisan disregard for federal mandates. Your calculated refusal to apply published catalog protections, denial of mandatory

grievance hearings, and bad-faith suppression of educational records constitute intentional discrimination and unlawful retaliation under Title VI, Section 504 ‿29 U.S.C. § 794; 34 C.F.R. § 104.61‾‾, and Title III of the ADA ‿42 U.S.C. § 12203‾‾. Every action is being preserved for federal

enforcement and judicial review.

3. FERPA Statutory Definition and Unconditional Records Access

__34 C.F.R. § 99.3 & § 99.10; 20 U.S.C. § 1232g):

Under federal law, "student" includes any individual who is or has been in attendance. A student's enrollment status does

Angie Zamecnik Sept 27, 2026 Evidentiary Packet — Page 8 of 11

not extinguish their right to inspect and review records within 45 days. Withholding the transfer credit evaluation and complete file is illegal.

4. Mandatory Incomplete Grade Policy

__Herzing University Catalog): An active Grade Appeal requires an Incomplete ("I") grade on official records. Executing an

SAP dismissal on September 9 while the September 4 Grade Appeal was pending violates university policy.

5. Federal SAP Due Process Mandate __34 C.F.R. § 668.34(a)(9)): Institutions must evaluate appeals based on documented extenuating circumstances and an academic plan. Summary rejection without substantive evaluation

violates Title IV regulations.

6. Breach of Published EthicsPoint Grievance Timeline: Herzing's published complaint procedure mandates written findings within 10 days; leaving 5 formal filings uninvestigated violates published institutional commitments.

SECTION IV˙ FINANCIAL RESTITUTION DEMAND & FORMAL ADVISING SESSION NOTICE

1. Financial Restitution &

Tuition Waiver: Herzing University has billed and collected tens of thousands of dollars in federal financial aid and direct tuition while failing to deliver the instructional access and legal accommodations guaranteed by law and contract. I formally demand full financial restitution, including complete waiver,

reversal, and Borrower Defense discharge of all tuition, institutional fees, and federal loan obligations incurred for all NSG 523 attempts, alongside immediate academic reinstatement to complete my graduate degree with all approved ADA accommodations provided at zero additional tuition cost.

2. Formal Advising Session

Notice:
I
formally
scheduled
our
30-minute
advising
session
for
Friday,
September
18,
2026,
at
1˘00
PM
Central
Time
_2˘00
PM
Eastern
Time)
via
Microsoft
Teams.
Continuing
to
compound
systemic
statutory
violations
with
personal
hostility
and
administrative
obstruction
escalates
institutional
liability.
Attend
the
scheduled
session

prepared to deliver the completed Transfer Credit Evaluation, apply the mandatory Incomplete grade, and facilitate lawful progression.

FORMAL ADMINISTRATIVE DIRECTIVES˅

1. Deliver the completed transfer credit evaluation and complete educational file immediately pursuant to FERPA.

2. Correct the NSG 523 grade to Incomplete ("I")

on
official
transcripts
pending
hearing
of
the
September
4
Grade
Appeal.
3.
Vacate
the
defective
September
9
SAP
dismissal
and
process
the
pending
MS-HHS
program
transfer.

Angie Zamecnik Sept 27, 2026 Evidentiary Packet — Page 9 of 11

4.
Process
complete
financial
waiver
and
reimbursement
for
all
compromised
coursework
attempts.
5.
Attend
the
scheduled

advising session on Friday, September 18, 2026, at 1ˇ00 PM CDT / 2ˇ00 PM EDT via Microsoft Teams to confirm operational resolution.

Chavon J. Wright ‿CJ Wright) Student IDˇ W24672939 OCR Case No. 05262347 Herzing Case # 00542344 Part 4ˇ Chronological Attachment Index

&

Evidentiary

Exhibit

Ledger

1.

1.

CWright26.

9.16.

HUADA.

Correspondence

Thread

with

Angie

Zamecnik.pdf

—

Official

email

thread

documenting

adverse

dismissal,

advisor

removal,

and

records

refusal.

2.

2.

CWright26.

HUADA.

They

Changed

the

Catalog

-

Longitudinal

Catalog

Policy

Evolution

&

Evidentiary

Audit.pdf

—

Publication-edition

evidentiary paper and longitudinal audit analyzing Herzing University graduate catalog policy revisions, retroactive requirement additions, and retaliatory shifts across May 2025, September 2025, and January 2026 catalogs. Supporting references: CW. HUADA. 9.22. Herzing Policy Over Time.gdoc. and Campus Catalog - Changes from Previous Catalog

_January

2025_.pdf

.

3.

3.

CWright26.

9.16.

HUADA.

Formal

Legal

Notice

Draft

to

Angie

Zamecnik

&

Herzing

Executive

Leadership

—

Final

legal

demand

for

records,

Incomplete

grade

placement,

financial

refund,

and

advising

attendance.

4.

4.

CWright26.

9.16.

HUADA.

EthicsPoint

Historical

Grievance

Record

&

Non-Response

Ledger.pdf

—

Audit

of

6

formal

EthicsPoint

submissions

documenting

5

uninvestigated

and

ignored

filings.

5.

5.

CWright26.

9.16.

HUADA.

Correspondence

Thread

with

Dr.

Danielle

Laban.pdf

—

Written

thread

documenting

accommodation

requests

and

denial

of

catalog

on-campus

testing

rights.

6.

6.

CWright26.

9.9.

HUADA.

A.

SAP

Appeal

Denial

&

Administrative

Dismissal.

Adverse

Action.gmail.pdf

—

Dismissal

notice

issued

while

NSG

523

Grade

Appeal

was

actively

pending.

7.

7.

CWright26.

9.4.

HUADA.

Submitted

via

Portal.

SAP

Appeal

Form

Case

00542344.pdf

—

Official

portal

appeal

detailing

medical

mitigating

circumstances

and

40-hour

weekly

study

schedule.

8.

8.

CWright26.

9.4.

HUADA.

Emailed

to

Dr

Danielle

Laban.

NSG

523

Grade

Appeal

Form.pdf

—

Formal

grade

appeal

for

79%

to

73%

drop

caused

by

extension

work

zeros.

9.

9.

CWright26.

9.4.

HUADA.

16-Page

Addendum

with

Hardships,

40-Hour

Plan,

and

Exhibits

A-J

—

Evidentiary

brief

and

petition

for

transfer

to

MS-HHS.

Angie Zamecnik Sept 27, 2026 Evidentiary Packet — Page 10 of 11

10.

10.

CWright26.

9.16.

HUADA.

Declaration

of

Financial

Injury

&

Catalog

Hybrid

Testing

Violation.pdf

—

Official

declaration

of

tuition

debt,

catalog

hybrid

testing

breach,

and

restitution

demand.

11.

11.

CWright26.

9.16.

HUADA.

Meeting

Confirmation
and
Teams
Details
with
Angie
Zamecnik.pdf
—
Confirmed
Microsoft
Teams
advising
teleconference
for
Friday,
Sept
18,
2026
at
1˘00
PM
CDT.
12.
12.
CWright26.
9.16.
HUADA.
Pertinent
Evidentiary
Filing
Packet.pdf
—
11-page
filing
packet
for
regulatory
agency
intakes.
13.
13.
CWright26.
9.16.
HUADA.

Consolidated Evidentiary Exhibits Index & Record Package.pdf — 42-page indexed legal record with Exhibits 1 through 7. 14. 14. CWright26. 12.14.25. 10-Month Timeline of Systemic Failure & FERPA Records Demand.pdf — Historical filing documenting accommodation failures and statutory records demand. 15. 15. CWright26. 9.3.

HUADA.

Contact

Directory

and

Checklist

to

Report

Herzing

—

Multi-tab

reporting

directory

and

operational

action

tracking

workbook.

16.

16.

Public

Student

Proctoring

Petition

—

Replace

ProctorU

at

Herzing

University

—

Public

petition

corroborating

systemic

proctoring

failures

affecting

over

600

students.

17.

17.

CWright26.

8.25.

HUADA.

Canvas

Grades

NSG

523-7

Summer

2026

Due

Date

Gradebook.pdf

—

Canvas

gradebook

record

printed

August

25,

2026,

capturing

the

pre-alteration

79%

standing

before

retroactive

grade

manipulation.

18.

18.

CWright26.

8.31.

HUADA.

Canvas

Grades

NSG

523-7

Summer

2026

Assignment

Groups

Gradebook.pdf

—

Subsequent

Canvas

gradebook record printed August 31, 2026, documenting the arbitrary drop from 79% to 73% caused by zeros entered on accommodated extension work.

19.

19. CWright26. 8.25. HUADA. Canvas Grades NSG 523-7 Summer 2026 Expanded Comments Gradebook.pdf —

Detailed Canvas gradebook printout capturing instructor evaluation

notes
and
submission
comments
for
individual
coursework
modules.
20.
20.
CWright26.
8.26.
HUADA.
Canvas
API
NSG
523
Submissions
Raw
JSON
Export.pdf
—
Raw
JSON
payload
exported
from
Canvas
Submissions
API
endpoint
for
course
54628,
establishing
submission
timestamps,
workflow
states,
and
grade
modification
histories.
21.

21.

CWright26.

8.26.

HUADA.

Canvas

API

NSG

523

Assignment

Groups

Raw

JSON

Export.pdf

—

Raw

JSON

data

from

Canvas

API

assignment

groups

endpoint

detailing

grading

rule

parameters,

group

weights,

and

score

calculations.

22.

22.

CWright26.

8.26.

HUADA.

Canvas

NSG

523

Grades

HTML

Web

Archive

Source.mhtml

—

Complete raw HTML DOM snapshot and client-side page archive preserving verified server state of the NSG 523 Canvas grades interface.

23.

23. CWright26. 8.26. HUADA. Canvas NSG 523 Gradebook DevTools Elements and Console Telemetry.png

—

Photographic evidence capturing Chrome Developer Tools

Angie Zamecnik Sept 27, 2026 Evidentiary Packet — Page 11 of 11

Console

and

Elements

panels

inspecting

client

scripts,

network

parameters,

and

DOM

elements

on

the

grade

verification

page.

24.

24.

CWright26.

8.26.

HUADA.

Canvas

NSG

523

DevTools

Application

Storage

Telemetry.png

—

Photographic

evidence

capturing

Chrome

Developer

Tools

Application

tab

showing

active

storage

keys,

service

workers,

and

telemetry

data.

25.

25.

CWright26.

8.26.

HUADA.

Canvas

NSG

523

DevTools

Application

Local

Storage

Keys.png

—

Photographic

evidence

showing

Chrome

DevTools

inspecting

local

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key-value

pairs,

session

tokens,

and

timestamp

caches

for

the

gradebook

interface.

26.

26.

CWright26.

8.23.

HUADA.

Elsevier

HESI

RN

Med-Surg

Specialty

Exam

Diagnostic

Score

Report.pdf

—

Official

Elsevier

HESI

diagnostic

exam

scoring

report

verifying

727

raw

score,

65.43

conversion

score,

and

category

performance

metrics.

27.

27.

27.

CWright26.

8.21.

HUADA.

Unsent

Final

Exam

Extension

Request

&

Prescriber

Coordination

Records

__Institutional

Inaction

&

Constructive

Abandonment)

—

5-page

evidentiary

dossier

establishing

contemporaneous

medical

stabilization

efforts

and

untransmitted

emergency

exam

extension

request

drafted

August

21,

2026,

withheld

due

to

institutional

non-response

and

constructive

abandonment.

28.

28.

Zamecnik,

Angie,

Taubenheim,

Sam.

Internal

appeals,

complaints,

External

Ethics

points

appeals.

15

out

of

15

ignored,

delayed,

or

unresolved.

15

out

of

15

policy

breached

—

Ledger

auditing

15

out

of

15

internal

appeals,

faculty

complaints,

and

external

EthicsPoint

grievances

ignored,

delayed,

or

unresolved

across

18

months.

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ADDENDUM B · GEMINI NOTEBOOK MULTIMODAL AI AUDIO PODCAST SUITE & TRANSCRIPT

"SYLLABUS SUES UNIVERSITY FOR STUDENT" — GEMINI NOTEBOOK AI PODCAST QR CODE, AI TRANSPARENCY DISCLAIMER & STRUCTURED TRANSCRIPT

Direct Access to the Gemini Notebook Audio Synthesis (`Syllabus_Sues_University_For_Student.m4a`) and Companion Evidentiary Audio Deep-Dives

ARTIFICIAL INTELLIGENCE (AI) MULTIMODAL AUDIO SYNTHESIS & EVIDENTIARY DISCLAIMER

Mandatory AI Transparency Notice: The audio deep-dive titled *"Syllabus Sues University For Student"* (**`Syllabus_Sues_University_For_Student.m4a`**) and its companion audio briefings were generated using **Google Gemini Notebook (NotebookLM Audio Overview)** by synthesizing the authenticated primary source records, course syllabi, Canvas LMS audit logs, federal civil rights statutes, and institutional correspondence compiled by Chavon Jenea Wright (`CWright26`). **This AI-generated podcast is provided as an accessible, executive multimodal synthesis and cognitive navigation aid (aligned with ADA Title III / Section 504 auxiliary aid principles) and is NOT offered as independent percipient witness testimony.** Every factual assertion, date, course code, ticket number, and statutory citation discussed in the audio synthesis is independently grounded in and verified by the underlying primary exhibits linked in this Compendium.

1. QR Codes & Direct Links to Gemini Notebook Podcast & Companion Audio Tracks

QR Code	Audio Podcast / Notebook Title	Direct Clickable URL & Scope
	Primary Podcast: "Syllabus Sues University For Student" (`Syllabus_Sues_University_For_Student.m4a`)	**https://huadaplus.netlify.app/media.html** · **Backup Mirror Link** Deep-dive audio synthesis examining how Herzing University's own published syllabi, catalog guarantees, and `HH 620`/`HH 630`/`MSN-DE` curricular structures establish contractual breach and statutory liability.
	Interactive Gemini Notebook: "MSNDE to HHS" (Live Indexed Source Repository)	**https://huadaplus.netlify.app/media.html** Contains all 10 Compendium Volumes, the Standalone Case & Ticket Registry Sheet, and Angie Zamecnik's Sept 18, 2026 Transcript & Evidentiary Packet.

Companion Audio Synthesis Tracks in HUADA+ Evidentiary Repository:

- **Track 2: `Nursing_student_exposes_university_with_browser_code.m4a`** — Forensic walkthrough of Canvas LMS grade-change metadata, Proctorio/ProctorU session crashes, and browser developer console evidence.
- **Track 3: `Nursing_student_audits_her_university_code.m4a`** — Audit of retroactive zeroing in `NSG 523` and `NU 730`, unapplied 200% timer extensions, and withheld FERPA audit logs.
- **Track 4: `Acing_Exams_Software_Says_You_Failed.m4a`** — Analysis of the July 17, 2025 Proctorio collapse, ProctorU Ticket `7407283`, and how accommodation non-implementation manufactured an artificial SAP dismissal.

2. Comprehensive Structured Transcript & Analytical Synthesis of "Syllabus Sues University For Student"

Segment I — Opening Premise: When the Institution's Own Syllabus Becomes the Star Witness (00:00 – 03:45)

> *"[Host A]: Imagine walking into an administrative appeal where the university claims it has unfettered academic discretion to fail you, dismiss you, and keep over $17,000 in federal Title IV loan funds—and your star witness against the university isn't just your own word, it's the university's own published syllabus, its own course catalog, and its own internal LMS timestamps. [Host B]: That is the exact architecture of the CWright26 evidentiary record involving Chavon J. Wright and Herzing University. When you lay the published Herzing syllabi for NSG 520, NSG 521, NSG 522, NSG 523, NU 700, NU 725, NU 730, and NU 760 side by side with the approved ADA accommodation plan (HUADA.082426.V3) and the federal requirements under Section 504 (34 C.F.R. § 104.44), the syllabus literally indicts the administration's own conduct."*

Segment II — The Accommodation Disconnect & The July 17, 2025 Proctoring Collapse (03:46 – 08:20)

> *"[Host A]: Let's look at the mechanics. On March 14, 2025, formal medical documentation is on file establishing approved accommodations: 200% extended testing time, a distraction-reduced environment permitting verbal processing, and a 48-to-72-hour assignment extension window. Yet in May 2025, instead of simply implementing those settings in Canvas and Proctorio, the ADA office blasts 41 separate emails containing confidential disability status to roughly 35 staff members. [Host B]: And even after 41 emails, the technical accommodation still isn't properly coded into the testing software! On July 17, 2025, during a high-stakes exam, Proctorio collapses mid-session. ProctorU / Meazure Learning logs Support Ticket 7407283. And in NSG 523, because the 48-to-72-hour accommodated extension window wasn't applied to graded submissions, the grade is artificially depressed from a passing 79% down to a 73%—missing the 76% progression threshold by just three percentage points solely because of unapplied disability accommodations."*

Segment III — The Mandatory Incomplete ('I') Rule & The September 2026 Sham Appeal (08:21 – 13:10)

> *"[Host A]: Here is where the syllabus and catalog become a binding legal trap for the university under Wisconsin and Florida contract and consumer protection law (Wis. Stat. § 100.18 and Fla. Stat. § 501.204). Herzing's own catalog policy mandates*

> *that while a formal Grade Appeal is pending, an Incomplete ('I') grade must remain on the record—which legally and mathematically prevents a Satisfactory Academic Progress (SAP) dismissal.*
> *[Host B]: Yet when Chavon files Case 00542344 on September 4, 2026, what happens in the September 18, 2026 recorded Teams meeting with Director Angie Zamecnik? At timestamp 27:15, after admitting that she and AVP Dr. Danielle Laban had already decided that submitting an appeal would not change the grade, Zamecnik asks Chavon to email 'proof' that she even submitted the appeal—an appeal Laban had already received two weeks earlier! And then Zamecnik locks the video recording on SharePoint so Chavon cannot download it."*

Segment IV — The BSHHS & Graduate Health Sciences Bridge (HH 620 / HH 630) and Dual-Track Remedies (13:11 – End)

> *"[Host A]: Meanwhile, on September 14 and October 8–13, 2026, Herzing's own registrar and admissions team (including Kaitlyn Alicea) confirm in writing that Chavon's Transfer Credit Evaluation is complete—recognizing 31 credits toward the Bachelor of Science in Health and Human Services (BSHHS) for an 11/2 start—while simultaneously withholding the physical evaluation document for weeks and demanding she sign a new re-entry contract.*
> *[Host B]: By mapping every single learning objective across HH 620, HH 630, and the MSN-DE curriculum against national CCNE, QSEN, and NCHEC competencies, and pairing that curriculum audit with a six-school transfer matrix (UCF, UF, FAMU, TESU, Charter Oak, and Excelsior) and a federal evidence preservation motion under Rule 37(e), the CWright26 compendium turns an administrative blockade into a self-proving evidentiary record."*

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ADDENDUM C · SARAH MILLARD WITNESS SUBMISSION, FORWARDED OCT 13–14, 2026 OCR DENVER RESPONSE & EMAIL AUDIT

THIRD-PARTY WITNESS DECLARATION OF SARAH MILLARD (33 PAGES), FORWARDED OCR DENVER DISMISSAL CLAIM (OCT 13–14, 2026), HLC ACKNOWLEDGMENT & KAITLYN ALICEA TCE EMAILS

Complete Evidentiary Record of October 8–14, 2026 Forwarded Correspondence, Unsubmitted EthicsPoint Packets (Portal Futility), and the Oct 13, 2026 300+ Email ServiceNow/Canvas Loop

CRITICAL OCTOBER 10–14, 2026 DEVELOPMENTS CAPTURED IN THIS ADDENDUM

1. Sarah Millard's 33-Page Independent Witness Submission (Oct 10, 2026): On October 10, 2026, witness **Sarah Millard** transmitted a 33-page *Witness Declaration and Request for Institutional Review and Corrective Action* (**`Herzing University Dispute.pdf`**) to 26 Herzing executives and federal oversight addresses under OCR Case No. `05262347`, demanding independent compliance review by October 16/23, 2026.

2. OCR Denver's Oct 13, 2026 Response Forwarded by Sarah Millard on Oct 14, 2026: On October 13, 2026 at 4:24 PM, `OCR.Denver@ed.gov` sent an email directly to Sarah Millard stating: *"Ms. Millard, Your case, #05-26-2347, was dismissed on May 28, 2026. OCR does not have another complaint from you."* Sarah Millard forwarded that response to Chavon Wright on October 14, 2026 (**Gmail Thread 1a12864b80cb33cb**) — revealing that OCR Denver misattributed Student Chavon Wright's docket (`05262347`) to the third-party witness and claimed a May 28, 2026 dismissal prior to the August–September 2026 retaliatory dismissal events!

1. Verbatim Record of Newly Forwarded October 8–14, 2026 Emails

Date & Gmail Thread ID	Sender & Recipients	Subject Line	Verbatim Excerpt & Evidentiary Significance
Oct 13–14, 2026 **Thread 1a12864b80cb33cb** / `1a1380539cf6113f`	**From:** `OCR.Denver@ed.gov` **To:** Sarah Millard (Forwarded to Chavon Wright Oct 14, 2026)	`Fwd: Herzing University Dispute – OCR Case #05-26-2347`	> *"Ms. Millard, Your case, #05-26-2347, was dismissed on May 28, 2026. OCR does not have another complaint from you. Sincerely, Office for Civil Rights, Denver Office"* **Significance:** Proves administrative confusion at OCR Denver (treating witness Sarah Millard as the complainant on Case `#05-26-2347`) and confirms that the post-May 28, 2026 retaliatory events (July 2025/2026 exam lockouts, Sept 4/9, 2026 SAP dismissal, and Sept 18, 2026 Zamecnik admission) require a newly docketed OCR complaint / DOJ referral (`766398-JVT`) and federal judicial review.
Oct 14, 2026 **Thread 1a135f2b9fcb6963**	**From:** Higher Learning Commission (HLC) **To:** Chavon Wright	`HLC Complaint Submission Confirmation (Criteria 2 & 3)`	> *"Thank you for submitting your complaint regarding Herzing University to the Higher Learning Commission. Your submission has been logged for review under HLC Criteria for Accreditation (Criterion 2: Integrity — Ethical and Responsible Conduct; Criterion 3: Teaching and Learning)."* **Significance:** Confirms formal institutional accreditor review is active as of October 14, 2026.
Oct 8–13, 2026 **Threads 1a11c05bdb729841 & 1a121ad15358d216**	**From:** Kaitlyn Alicea (`kalicea@herzing.edu`) **To:** Chavon Wright	`Re-Entry / Transfer Credit Evaluation (31 Credits – 11/2 Start)`	> *"Your Transfer Credit Evaluation is complete showing 31 credits transferring into the program, making you eligible for the 11/2 start date... To move forward, you will need to complete the re-entry application."* **Significance:** Confirms Herzing possessed the completed 31-credit Transfer Credit Evaluation while Angie Zamecnik withheld it in violation of FERPA (34 C.F.R. § 99.10), and shows Herzing conditioning program transition on signing a new re-entry contract.
Oct 13, 2026 **Threads 1a136a979760b346, 1a13617b406df0ce, 1a135e01bf117dea**	**From:** HU Assist ServiceNow (`INC0587386`) & Canvas Support	`Automated Ticket Loop – Cases 15729468 through 15733515`	**300+ Automated Loop Emails in Single Day:** ServiceNow ticket `INC0587386` triggered a runaway automated email loop with Instructure Canvas Support generating cases `15729468`, `15730941`, `15731385`, `15733197`, `15733275`, `15733351`, `15733432`, and `15733515`—flooding Chavon's inbox with over 300 automated messages while substantive record requests (`RITM0118168`) were prematurely marked "Closed Complete."

2. Complete Verbatim Text of Sarah Millard's 33-Page Witness Submission (Oct 10, 2026)

Sarah Millard Witness Submission (Oct 10, 2026) — Page 1 of 33

Witness
Declaration
and
Request
for
Institutional
Review
and
Corrective
Action
Disability
Access,
Civil
Rights,
and
Academic
Appeal
Concerns

Re:
Herzing
University's
Violations
against
Chavon
J.
Wright

Submitted
by:
Sarah
Millard

To:
Herzing
University
Office
of
the
President,
institutional
compliance
leadership,
designated

compliance

reviewer,

and

other

relevant

departments,

individuals,

organizations,

and

government

offices

Date:

October

10,

2026

Office

of

Civil

Rights

Case

No.:

05262347

Sarah Millard Witness Submission (Oct 10, 2026) — Page 2 of 33

2

Contents

1.

Statement

of

Purpose

.....

3

2.

Request

for

Institutional

Oversight,

Independent

Review,

and

Corrective

Action

.....

4

3.

Witness

Declaration
.....
11

4.

Memorandum

of

Civil

Rights,

Disability

Access,

and

Policy

Compliance

Concerns
.....
20

5.

Evidence

Preservation

Letter
.....
30

Sarah Millard Witness Submission (Oct 10, 2026) — Page 3 of 33

3

Dear

Herzing

University,

I

submit

the

attached

materials

in

my

individual

capacity

as

a

witness

to

an

established

Office of Civil Rights case concerning Chavon J. Wright (the “Student”) and Herzing University (the “University”).

The four enclosed documents provide the supporting factual account, issues requiring review, and specific actions requested. I ask that they be considered together and directed

to an institutional official with authority to coordinate the University's response across multiple departments.

Please acknowledge receipt of this submission and all four enclosed documents on or before October 16, 2026.

Sarah Millard
sarah.e.millard@gmail.com
404.538.8805

October 10, 2026

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Sarah Millard Witness Submission (Oct 10, 2026) — Page 4 of 33

4

Request for Institutional Oversight, Independent Review, and Corrective Action

This request concerns Chavon J. Wright (the “Student”), a woman with documented disabilities and established accommodations formerly enrolled in Herzing University’s MSN Direct Entry nursing program.

As witness, I hereby submit

this request for institutional oversight and independent review by the executive and compliance leadership of Herzing University (the “University”), and request written findings and corrective action concerning the matters set forth below.

Cause for Review

I refer for review the repeated failures described

by the Student and her supporting materials in her multiple appeal submissions. These failures include, but are not limited to, the implementation of disability accommodations, examination conditions, assignment credit and extensions, and formal appeals and requests for review across three academic terms.

These failures

required repeated enrollment and contributed to the Student’s September 9, 2026 dismissal, though her existing appeals remained unaddressed and unresolved. Questions remain about appeal routing and review, records access, lack of follow-up, and multiple policy violations at the institutional and federal level.

I

am witness to the Student’s account and come forward to request an independent reconstruction and review of this case. Independent oversight is required to establish the facts, assess ADA and institutional policy compliance, and determine corrective action and remedies for academic, access, enrollment, and

financial errors.

Review Structure and Institutional Responsibility

Designate one coordinating official and independent reviewer who did not participate in the challenged accommodation, grading, appeal, or dismissal decisions. Identify their authority, prior involvement, scope, and direct contact information. The reviewer should have access to

the
records
and
personnel
necessary
to
conduct
a
coordinated
review
across
the
responsible
University
departments.

Sarah Millard Witness Submission (Oct 10, 2026) — Page 5 of 33

5

For
disability
issues,
identify
the
applicable
accommodation
appeal
procedure
and
the
review
stage
reached.

The
published
2026
procedure
provides
uninvolved
reviewers
and
written
determinations.

Identify

reviews,

decisions,

deadlines,

and

the

next

available

stage.

Requests

and

Questions

Requiring

Findings

1.

ADA

Accommodation

Terms

and

Institutional

Notice

Legal

statutes

and

policy

references:

P1,

pp.

13,

33;

P2;

P3,

pp.

15-18;

L1;

L2

a.

What

accommodations

applied

during

each

disputed

period?

b.

When

were

they

requested,

approved,

revised,

and

communicated

to

faculty,

testing

personnel,

and

vendors?

c.

What

was

the

University’s

response

to

reports

that

examination

arrangements

were

inaccurate,

ineffective,

or

not

implemented?

d.

Identify

the

terms

and

effective

dates

applicable

to

each event.

e. Determine whether necessary academic adjustments and reasonable modifications were identified and implemented under 34 C.F.R. §§ 104.4 and 104.44(a) and 28 C.F.R. § 36.302.

2. Examination Conditions and Assignment Credit Legal statutes and policy references: P1, pp. 19, 22-23; P2; L1-L2

a. For each disputed examination, identify the proctor failures and deviations from established accommodations.

b. For each disputed examination, identify the grading consequence and University's response.

c. For each examination-relief request, identify the policy version, reviewer, evidence, and reason for the decision.

d. Explain

whether the Dean of Prelicensure Nursing reviewed an attempted-exam request under the applicable rule.

e. Determine whether an individualized modification or academically valid reassessment was considered under 34 C.F.R. § 104.44(a) and 28 C.F.R. § 36.302(a).

f. Identify and explain the basis for denying

the
Student’s
requested
remedy.

3.
Grade
Calculations
and
Resulting
Consequences
Legal
statutes
and
policy
references:
P1,
pp.
18-21,
25;
P4;
P6;
P7;
L6;
L6a;
L6b
a.
Provide
the
complete
calculation
for
each
NSG
523
enrollment,
including
assignment
credit,
assessment/examination
weights,
score
conversions,
and

any other course requirements that affect grading.

b. For each NSG 523 enrollment, identify how the Student's grades were calculated under the accommodation terms.

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Sarah Millard Witness Submission (Oct 10, 2026) — Page 6 of 33

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c. For assignment credits, explain the basis for each zero, deduction, and late-work provisions

and
if
ADA
accommodations
were
considered.

4.
Appeal
Receipt,
Review,
and
Dismissal
Legal
statutes
and
policy
references:
P3,
p.
18;
P4;
P6;
P7;
L1;
L6
a.
For
each
separate
grade
appeal,
accommodation
appeal,
SAP
appeal,
grievance,
discrimination
report,
and
related
requests,
identify
the
case

number;
evidence
of
receipt;
who
or
where
the
appeal,
request,
or
grievance
was
routed;
the
published
deadline;
the
University’s
action;
and
the
University’s
legal
or
policy
basis
for
that
action.
b.
Determine
whether
disability
complaints
received
equitable
handling
with
appropriate
due
process
standards
under

34 C.F.R. § 104.7(b).

c. Establish the status of the latest grade appeal on September 9 and September 18, 2026.

d. Identify the legal or policy rules governing the Student’s program dismissal during the unresolved grade dispute, any applicable stay or interim measures,

and how those rules were applied.

5. Records Access and Administrative Follow Through Legal statutes and policy references: P1, p. 32; P2; P5; L5; L5a; L5c a. For each records request, identify the receipt date, deadline, response, and inspection method. Address disability files,

course records, appeal histories, and Student Services entries.

b. Explain any withholding and whether redacted access is available.

c. Determine compliance with 34 C.F.R. § 99.10(b)–(e), including access within a reasonable period and no later than 45 days after receipt, responses to reasonable requests

for explanations or interpretations, and copies or alternative arrangements where circumstances effectively prevent inspection.

d. Identify whether education records were destroyed while a qualifying inspection request remained outstanding.

e. Examine the complete September 18, 2026 meeting record and subsequent communications to determine what follow-up

was agreed upon and what action followed.

f. Identify the official responsible for any outstanding response.

6. Civil Rights and Procedural Concerns

Legal statutes and policy references: P3, p. 11-14, 62-73; P8; L1; L2; L3; L4; L4a; L4b

a. Investigate whether disability discrimination,

racial discrimination, race-related bias, or departures from governing procedures influences the Student's treatment or challenged decision.

b. Assess the evidence under Section 504, ADA Title III, and Title Vi, including 34 C.F.R. § 100.3.

Sarah Millard Witness Submission (Oct 10, 2026) — Page 7 of 33

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c. Determine whether the request for

assistance in exercising disability rights prompted retaliation, intimidation, coercion, or interference under 34 C.F.R. § 100.7(e), incorporated through § 104.61, and 28 C.F.R. § 36.206.

d. Consider communications, explanations, and comparable cases.

e. Identify the complaint, preliminary inquiry, and investigation steps taken under the

applicable procedures, including the responsible official and the basis for any decision to decline or close an investigation.

f. Determine whether reports were routed within the required period and whether the non-retaliation provisions were observed.

g. State the evidence supporting each finding.

Required

Contents of the Written Findings

For each material issue, please provide:

- The issue and finding
- The evidence reviewed and considered
- The unresolved factual questions or missing records
- The efforts to obtain or verify information, or reasons for proceeding without

it

- Legal and/or policy rationale for granting or denying an appeal or request
- The responsible office and contact

A general assurance that University policies were followed would not resolve the questions presented here.

Interim Measures and Corrective Action

During this

review,
evaluate
appropriate
interim
measures
concerning
enrollment
restrictions,
disputed
charges,
records
access,
and
other
continuing
educational
or
financial
consequences,
including
measures
available
under
the
applicable
discrimination
procedure.
Explain
any
denied
interim
measure
and
the
governing
constraint.
(
Legal
statutes
and
policy
references:
P3,
pp.

65-66,

73).

Where

findings

establish

an

error

or

access

failure,

I

request

the

following

measures:

- Correct

erroneous

assignment

zeros,

penalties,

exclusions,

and

grade

calculations;

retain

the

change

history

and

issue

corrected

records.

- Provide

a

properly

accommodated

reassessment

or

another

academically

valid

remedy.

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to

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Sarah Millard Witness Submission (Oct 10, 2026) — Page 8 of 33

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- Reconsider dismissal, progression, SAP, reentry, and aid decisions affected by corrected grades or access findings.
- Provide options consistent with the Student's chosen educational goal.
- Review tuition and mandatory fees for repeated NSG 523 enrollment, payment

sources,

prior

credits,

and

verified

error-related

costs.

Provide

supported

refunds,

credits,

reversal,

or

other

remediation

and

a

reconciled

ledger.

•

Correct

identified

training,

platform,

and

proctor-oversight

failures.

Identify

each

measure’s

responsible

office,

implementation

schedule,

and

method

for

reporting

problems.

Preserve

the

Student’s

existing

submissions and original receipt dates and identify any additional filing needed under a separate procedure.

Response Schedule

Please acknowledge this request on or before October 16, 2026 and identify the responsible official, independent reviewer, and review schedule on or before October 23, 2026.

Comply with separate applicable deadlines, including the records-access deadline under 34 C.F.R. § 99.10(b). If a target cannot be met, provide a written explanation and concrete response date.

(Legal statutes and policy references: L5a).

Exhibit 1A and 1B contain the cited policies and

legal

authorities.

Sincerely,

Sarah

Millard

sarah.e.millard@gmail.com

404.538.8805

October

10,

2026

Sarah Millard Witness Submission (Oct 10, 2026) — Page 9 of 33

9

Exhibit

1A

-

Institutional

Policies

[P1]

Herzing

University

School

of

Nursing,

Prelicensure

Programs

Student

Handbook

2026,

SICCED09255468.HU.Prelicensure

Program

Student

Handbook.

Printed

pp.

8–9,

13,

18–25,

and

32–33:

program

scope,

accommodations,

grading,

communication,

progression,

examination

relief,

proctoring,

third-party

testing,

and

student

support.

Source

[P2]

Herzing

University,

Disability

Services,

Americans

with

Disabilities

Act

Policy.

Individual

accommodations,

requests

and

coordinator

meetings,

notice

of

ineffective

arrangements,

confidentiality,

and

disability-file

access.

Source

[P3]

Herzing

University, Annual Security Report 2026, Madison publication. Printed pp. 11–14: nondiscrimination and retaliation; pp. 15–18: accommodations and appeal; pp. 62–73: discrimination process, participation, outcomes, remedies, and retention. Page 68 addresses witness and process-advisor roles. Source

[P4] Herzing University, Satisfactory Academic Progress. Graduate and

nursing standards, warning, dismissal, academic appeal, probation, and academic plans.

Source

[P5]

Herzing University, Family Educational Rights and Privacy Act.

Education-records inspection, amendment, confidentiality, and disclosure.

Source

[P6]

Herzing University, Academic Catalogs archive.

Obtain the graduate editions and addenda governing Summer 2025, Fall

2025,
and
Summer
2026,
including
the
May
2025,
September
2025,
and
May
2026
editions
where
applicable.
Source

[P7]
Herzing
University,
January
2026
Graduate
Catalog,
Academic
Information.
Historical
reference
for
grade-appeal
procedures;
provide
the
complete
text
and
the
versions
applicable
to
the
disputed
terms.
Source

[P8]
Herzing
University,
Nondiscrimination
Policy.
Student
treatment
and
University
programs,
including
race
and
disability.
Source

Back
to
contents

Sarah Millard Witness Submission (Oct 10, 2026) — Page 10 of 33

10
Exhibit
1B
-
Legal
Authorities

[L1]
Section
504,
29
U.S.C.
§
794;
34
C.F.R.
§§
104.4,
104.7,
104.43,
and
104.44.
Covered-program

nondiscrimination,

grievance

procedures,

student

treatment,

and

academic

adjustments.

Source

[L2]

ADA

Title

III,

42

U.S.C.

§§

12181–12182;

28

C.F.R.

§

36.302(a).

Reasonable

modifications

in

covered

public

accommodations,

including

private

educational

institutions,

subject

to

fundamental-alteration

limits.

Source

[L3]

Title

VI,

42

U.S.C.

§

2000d;

34 C.F.R. § 100.3. Race, color, and national-origin discrimination in covered federally assisted programs. Source

[L4] 34 C.F.R. § 100.7(e), incorporated through § 104.61; 28 C.F.R. § 36.206. Retaliation, intimidation, coercion, and interference connected to protected rights and participation. Source

[L5] FERPA, 20

U.S.C. § 1232g; 34 C.F.R. §§ 99.3, 99.10, and 99.30. Covered maintained records, inspection, outstanding requests, and disclosure consent. Source

[L6] 34 C.F.R. § 668.34. Federal Title IV satisfactory academic progress standards and institutional financial-aid policies. Source

Additional linked provisions supporting L4 and

L5:

[L4a]

34

C.F.R.

§

104.61,

incorporation

of

Title

VI

procedures.

Source

[L4b]

28

C.F.R.

§

36.206,

retaliation

and

coercion.

Source

[L5a]

34

C.F.R.

§

99.10,

inspection

and

outstanding

requests.

Source

[L5b]

34

C.F.R.

§

99.30,

prior

consent

for

disclosure.

Source

[L5c]

U.S. Department of Education, Protecting Student Privacy, guidance on creation and retention of education records. FERPA does not require creation of new records; the outstanding-inspection-request restriction remains applicable.

Source

[L6a] U.S. Department of Education, Federal Student Aid Handbook 2025–2026, Volume 1, Chapter 1,

School-Determined Requirements, SAP New and Conflicting Information Requirements. Grade changes and scheduled SAP evaluations. Source [L6b] U.S. Department of Education, Federal Student Aid Handbook 2026–2027, Volume 1, Chapter 1, School-Determined Requirements. Current counterpart to L6a; identify the edition governing each aid decision. Source

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11

Witness

Declaration

I submit this declaration in my individual capacity as witness to an ongoing dispute between Chavon J. Wright (“Chavon” or “CJ”) and Herzing University (the “University”).

This declaration concerns changes I observed over approximately eighteen months while

CJ's accommodations and continuing academic and administrative disputes with the University continued, and continue to this present day.

During this period, we communicated in-person and through phone, email, and virtual video conferences approximately every day. My observations continue through to the present day.

Identity and Basis of Knowledge

I have known Chavon J. Wright in a professional and personal capacity since 2012.

I am a biochemist and published science and medical writer with a strong background in neuroscience, psychology, molecular biology, and physiology. While I

am not acting as Chavon's treating clinician or an institutional reviewer, I draw on my scientific training and research experience to explain how attention, executive function, sensory processing, and stress relate to the experiences and changes I observed over the course of this case.

About Chavon / CJ

Chavon is an incredibly bright and wildly friendly and kind individual. She is beyond helpful to those around her. Prior to the incidents described in this submission packet, Chavon’s GPA was very high, around a 3.8 - 4.0. This

GPA is indicative of a woman who has comprehension skills far above average. Chavon is able to understand and synthesize complex information to such an extent that she often flies through coursework with ease.

These statements indicate that the probability of Chavon failing

a test are essentially zero. It would have to be an extremely stressful circumstance and environment for Chavon to not pass an exam.

Initial Accommodation Process

I observed and identified a formal disability documentation submission on March 14, 2025 and a provisional

plan issued March 20, 2025. It identifies Emilie Thompson as ADA Coordinator and describes Chavon's objections to a requirement for forty-eight hours' advance notice of assignment extensions.

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Sarah Millard Witness Submission (Oct 10, 2026) — Page 12 of 33

12

Chavon described difficulty obtaining a plan that addressed her needs,

communication problems about the plan sent to faculty, and repeated efforts to obtain assistance. Her summary describes further meeting requests in spring and summer 2025 and an accommodation meeting in September 2025. My firsthand account during this initial period involved the observation and identification

of
the
University's
ADA
and
administrative
failures
and
the
initial
decline
in
Chavon's
capacity
and
state
of
well-being.

Exams

Immediately
following
each
exam
attempt,
Chavon
reported
extremely
stressful
and
severely
impactful
interruptions,
technical
delays,
platform
issues,
and
failure
of
the
proctor
to
adhere

to established accommodation procedures and instructions.

As stated previously, it is highly unlikely that Chavon would fail an exam. The circumstances she faced during that exam and subsequent exams are severe enough to warrant review and remediation.

I will never forget Chavon’s

confusion,

sadness,

and

frustration

at

the

proctor

and

platform

of

each

exam

attempt.

The

proctors

continuously

refused

to

accommodate

her

documented

disability.

Chavon

has

established

ADA

accommodations

that

simply

were

not

met.

For

each

exam.

Over

and

over

again.

Continuing

Academic

Disputes

and

Administrative

Demands

Additionally, I have observed ongoing disputes over assignment extensions and credit across NSG 523 enrollments in Summer 2025, Fall 2025, and Summer 2026, with each decision by the University or its representatives violating both institutional and federal policies.

I also observed

repeated enrollment and coursework while appeals were supposedly under review. Reviews took months and many of them remain wrongly unresolved.

Over the longer period, I observed a recurring administrative burden that involved repeated explanations of accommodation terms, defending herself to prejudiced representatives of

Herzing University, reconstructing events, identifying responsible offices, and constantly pursuing responses from the University officials about appeals, records, standing, and educational options.

I observed sustained high stress and declining health and well-being as these matters continued across three academic terms. The duration of

the process is central to my concern: repeated demands and unresolved questions continued for months while her mental health and ability to manage cognitive demands were deteriorating.

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13

Changes I Observed Over Eighteen Months

I personally witnessed a serious decline in

Chavon’s mental health and executive functioning. My comparison is to her earlier functioning during this period. By executive functioning, I mean her practical capacity to sustain attention, organize information, plan, shift between tasks, and follow through on responsibilities.

I am concerned that prolonged

uncertainty and repeated efforts to obtain review contributed to the decline I witnessed. The University should examine cumulative effects across the full period and the support Chavon needs to participate now.

September 2026

Chavon reported dismissal on September 9, 2026 while her latest

grade appeal remained unresolved.

On September 18, I attended her meeting with Angie Zamecnik, who identified herself as Director of Student Services for online nursing. Chavon sought appeal status, records, and responsible contacts; Ms. Zamecnik rudely requested appeal proof and supporting materials, despite

these supporting materials being provided formally and informally many times. I heard no substantive determination or firm follow-up deadline. Exhibit 2B provides a few details from this meeting and the exchanges that took place. Ms. Zamecnik appeared to have already determined Chavon would not

remain in this program any longer, despite the unresolved appeals.

I experienced the exchange as dismissive. Chavon had to repeatedly seek basic information about receipt, responsibility, and access and was not able to obtain an actual response. In my personal opinion, the exchange

read prejudiced, biased, ableist, and racist. This meeting is one example of many within the continuing eighteen-month history.

Scientific Context and Supporting Records

Research provides context for working memory, interruptions, sensory differences, anxiety, sustained stress, and repeated administrative demands.

Tavassoli and colleagues

studied
359
adults
using
sensory
questionnaires.
Autistic
adults
reported
greater
sensory
hypersensitivity
on
the
study
measure.
[S5]
This
supports
considering
an
individual
sensory
profile
when
reviewing
distractions.
Chavon’s
accommodation
terms
should
have
been
applied
during
these
examinations.

McEwen
explains
how
stress
responses
involve

neuroendocrine, autonomic, immune, and metabolic systems. Repeated activation or dysregulation contributes to cumulative physiological strain and allostatic load. [S6] This provides a biological basis for considering sustained psychological distress alongside physical well-being. Back to contents

Sarah Millard Witness Submission (Oct 10, 2026) — Page 14 of 33

14

Altmann and colleagues found that interruptions

lasting seconds increased errors in keeping one’s place in laboratory sequence tasks. [S2] This suggests interruption duration alone may underestimate practical effects.

Liston and colleagues followed healthy adults through a month of examination-related stress and a subsequent period of reduced stress. They found

impaired attention control and altered prefrontal network connectivity during the higher-stress period. [S8] The study supports considering sustained stress when examining changes in cognitive functioning.

Parker and colleagues’ review of seventeen observational studies associated higher allostatic load with greater mortality risk. [S9] This provides

context for the seriousness of cumulative physiological strain.

Moynihan, Herd, and Harvey describe learning, compliance, and psychological costs in public programs. [S7]

I apply that framework by analogy to identifying University procedures, reconstructing records, resubmitting proof, and facing uncertain outcomes.

Alderson and

colleagues’ meta-analysis of 38 adult ADHD studies found differences in verbal and visuospatial working memory. [S1]

Moran’s meta-analysis of 177 samples involving 22,061 participants associated greater anxiety with poorer working-memory performance. [S3]

This supports considering anxiety-related cognitive demands when assessing functioning under pressure.

Shields and colleagues found average impairments in working memory and cognitive flexibility after acute stress, with differing effects on inhibition and variation across conditions. [S4] Stressful demands can therefore be relevant to managing complex tasks.

These findings support examining how disability-related limitations, sustained

stress, repeated administrative demands, and functioning interacted over approximately eighteen months. I request timely review and measures that reduce avoidable continuing burden.

Timing and Continuing Effects

I am concerned that prolonged effort, high stress, and unresolved uncertainty contributed to the decline I observed

in her mental health and executive functioning. The cumulative burden and potential for continuing health consequences warrant review.

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15

My account should function as an invitation to examine the evidence. Chavon has established accommodations that were not met. The University continued

to

violate

federal

and

institutional

policies

to

seemingly

harm

Chavon

intentionally

and

with

retaliative

malice.

Sincerely,

Sarah

Millard

sarah.e.millard@gmail.com

404.538.8805

October

10,

2026

Back

to

contents

Sarah Millard Witness Submission (Oct 10, 2026) — Page 16 of 33

16

Exhibit

2A

Accommodation

and

Appeal

Chronology

Period

Reported

event

or

issue

Previously submitted records March 2025 Formal documentation submitted March 14; provisional plan issued March 20 Submission receipt, provisional plan, coordinator correspondence, requested terms. Spring and summer 2025 Further accommodation meeting requests, disputed faculty communications, assignment-credit and examination concerns. Meeting requests and responses, plan distributions,

faculty messages, submissions and grade histories. Summer 2025 First disputed NSG 523 enrollment; examination relief and assignment credit challenged. Governing syllabus, actual accommodation terms, exam records, gradebook, appeal submissions and decisions. September 2025 A substantive accommodation meeting and revised arrangements are described. Meeting record,

revised plan, effective dates, delivery to faculty and testing vendors. Fall 2025 Second NSG 523 enrollment; further proctoring or technical incidents and continuing accommodation and grade disputes. Incident logs, testing sessions, vendor tickets, plan implementation, grades and appeals. Late 2025 and early 2026 Formal

appeals, records requests, and requests about academic standing and educational alternatives continued. Original submissions, portal confirmations, routing histories, written determinations and records-access responses. Summer 2026 Third NSG 523 enrollment; further examination, coursework, and grading issues reported. Assessments, score conversions, assignment histories, testing settings, applicable

plans and later appeals. September 9 2026 Dismissal reported while the latest grade appeal remained unresolved. Dismissal notice, exact academic basis, pending-appeal records and decision chronology. September 18 2026 Sarah attended the Student Services meeting summarized in Exhibit 2B. Complete recording, transcript, chat, attendance

and

later

correspondence.

Through

the

present

Review

and

records

questions

remain

unresolved

in

the

account

supporting

this

submission.

Sarah Millard Witness Submission (Oct 10, 2026) — Page 17 of 33

17

Exhibit

2B

September

18

Meeting

Record

and

Follow

Up

Prepared

by

Sarah

Millard

from

her

participation

and

meeting

notes

regarding

the meeting between Chavon Wright and Angie Zamecnik.

Topic Notes Follow up needed Student status Ms. Zamecnik states that Chavon is no longer a student This appears to not be legal pursuant to statutes and policies described above. Please reinstate the student. Latest

grade

appeal

Ms.

Zamecnik

rudely

states

Chavon’s

appeals

were

not

available

and

required

proof

from

Chavon

that

she

submitted

an

appeal

at

all.

This

felt

like

Ms.

Zamecnik

was

insinuating

that

Chavon

was

lying.

Entirely

inappropriate.

Why?

Length

of

time

of

appeals

Discussion

addressed

ongoing

appeals

and

the

length

of

time

for

each.

Identify

appeal

timeframes.

“What

do

you

need?”

Mz.

Zamecnik

quite

rudely

and

dismissively

asks

what

Chavon

needs

and

what

she

wants

her

to

do.

Very

sarcastic.

Why?

Response

from

coordinator

Ms.

Zamecnik

said

Sam

would not be able to respond.

Confirm the available contact after dismissal and the response schedule.

Request for records

Ms. Zamecnik states there are no records.

Ms. Zamecnik states she is unable to provide records.

Ms. Zamecnik never sends records to Chavon.

Training

for

Ms.

Zamecnik.

Access

to

records.

SAP

appeal

and

grade

appeal

SAP

appeal

placed

prior

to

grade

appeal

process

beginning

Needs

remediation.

Back

to

contents

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18

Recording

of

the

meeting

Ms.

Zamecnik

appears

hesitant

to

record

the

meeting.

Why?

Dispositions

Chavon

was

practical,
pragmatic,
even
friendly.
Ms.
Zamecnik
appeared
to
have
come
to
the
meeting
with
a
predetermined
decision
that
seemed
to
be
based
in
a
prejudiced,
ableist,
and
racist
position.
It
was
all
very
biased.
She
didn’t
seem
to
care.
Why?
Brianne
Danielson
Ms.
Zamecnik

preliminarily

denies

giving

Chavon

Ms.

Danielson’s

title.

Why?

Do

not

CC

Sam

Student

Services

Coordinator

Ms.

Zamecnik

states

do

not

CC

the

Student

Services

Coordinator

Why?

Sarah Millard Witness Submission (Oct 10, 2026) — Page 19 of 33

19

Exhibit

2C

Scientific

References

[S1]

Alderson,

R.

M.,

Kasper,

L.

J.,

Hudec,

K.

L.,

&

Patros,

C.

H.

G.

(2013).

Attention-deficit/hyperactivity

disorder

(ADHD)

and

working

memory

in

adults:

A

meta-analytic

review.

Neuropsychology,

27(3),

287–302.

DOI

10.1037/a0032371.

Source

[S2]

Altmann,

E.

M.,

Trafton,

J.

G.,

&

Hambrick,

D.

Z.

(2014).

Momentary

interruptions

can

derail

the

train

of

thought.
Journal
of
Experimental
Psychology:
General,
143(1),
215–226.
DOI
10.1037/a0030986.
Source

[S3]
Moran,
T.
P.
(2016).
Anxiety
and
working
memory
capacity:
A
meta-analysis
and
narrative
review.
Psychological
Bulletin,
142(8),
831–864.
DOI
10.1037/bul0000051.
Source

[S4]
Shields,
G.
S.,
Sazma,
M.
A.,
&
Yonelinas,
A.

P.
(2016).
The
effects
of
acute
stress
on
core
executive
functions:
A
meta-analysis
and
comparison
with
cortisol.
Neuroscience
&
Biobehavioral
Reviews,
68,
651–668.
DOI
10.1016/j.neubiorev.2016.06.038.
Source

[S5]
Tavassoli,
T.,
Hoekstra,
R.
A.,
&
Baron-Cohen,
S.
(2014).
The
Sensory
Perception
Quotient
(SPQ):
Development
and

validation
of
a
new
sensory
questionnaire
for
adults
with
and
without
autism.
Molecular
Autism,
5,
29.
DOI
10.1186/2040-2392-5-29.
Source

[S6]
McEwen,
B.
S.
(2017).
Neurobiological
and
systemic
effects
of
chronic
stress.
Chronic
Stress,
1,
2470547017692328.
DOI
10.1177/2470547017692328.
Source

[S7]
Moynihan,
D.,
Herd,
P.,

&
Harvey,
H.
(2015).
Administrative
burden:
Learning,
psychological,
and
compliance
costs
in
citizen-state
interactions.
Journal
of
Public
Administration
Research
and
Theory,
25(1),
43–69.
DOI
10.1093/jopart/muu009.
Source

[S8]
Liston,
C.,
McEwen,
B.
S.,
&
Casey,
B.
J.
(2009).
Psychosocial
stress
reversibly
disrupts
prefrontal
processing
and

attentional

control.

Proceedings

of

the

National

Academy

of

Sciences,

106(3),

912–917.

DOI

10.1073/pnas.0807041106.

Source

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contents

Sarah Millard Witness Submission (Oct 10, 2026) — Page 20 of 33

20

Memorandum

of

Civil

Rights,

Disability

Access,

and

Policy

Compliance

Concerns

Purpose

and

Basis

I

submit

this

memorandum

in

my

individual capacity as a witness to the approximately eighteen-month history described in my Witness Declaration. It supports the accompanying oversight request concerning Chavon J. Wright / CJ Wright (the “Student”) and Herzing University (the “University”). The central concern is whether accommodation failures affected the

Student's NSG 523 outcomes, repeated enrollment, and dismissal, and whether the University provided effective review of those consequences.

Apply the accommodation plans, syllabi, catalogs, and policies governing each event in Summer 2025, Fall 2025, and Summer 2026. The published 2026 provisions identify relevant institutional

commitments; their application to earlier events requires the versions then in force. [P1, pp. 8–9; P6–P7]

Disability Access and Accommodation Implementation

Section 504 and ADA Title III require necessary academic adjustments and reasonable modifications in covered programs and private educational institutions. Section 504’s

protections extend to services provided through contractual arrangements.

Herzing’s disability policy provides individualized arrangements and a process for reporting ineffective accommodations.

The disputed forty-eight-hour notice requirement for extensions also warrants review against documented episodic or unpredictable limitations. [P1, pp. 13, 19, 33;

P2;

P3,

pp.

15–18]

Examination

Conditions

and

Assignment

Credit

The

reported

interruptions,

technical

delays,

proctor

refusals

to

comply

with

documented

accommodations,

and

inconsistent

assignment-credit

decisions

require

comparison

with

the

accommodations

effective

at

each

assessment.

Herzing’s

Online

Proctoring

policy

states

that

approved

accommodations

are

entered
into
vendor
profiles
and
visible
to
proctors,
and
that
University
personnel
independently
review
flags
before
imposing
penalties.
Vendor
involvement
therefore
requires
examination
of
University
oversight,
profile
settings,
communications,
and
incident
responses.
[P9;
L1]

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21

The
nursing
handbook’s
general
prohibition

on retakes must be considered alongside the obligation to evaluate necessary academic adjustments. Its attempted-examination procedure assigns requests to the Dean of Prelicensure Nursing. A decision denying relief should address the reported access failure, any reasonable modification or valid alternative assessment, and the specific

essential requirement or fundamental alteration relied upon. Assignment zeros and penalties likewise require reconciliation with approved extensions and actual submissions. [P1, pp. 19, 22–25; L1–L2; L8]

Academic Decisions and Appeal Handling

Prior academic performance provides context, while the disputed outcomes require accurate grade

calculations and assessment of the conditions under which scores were obtained. Each verified correction must be traced through affected progression, dismissal, tuition, and financial-aid decisions.

Section 504 requires prompt and equitable grievance procedures incorporating appropriate due process standards. Herzing’s published accommodation procedure provides an

uninvolved
secondary
reviewer
and
a
written
determination
within
ten
business
days,
a
further
C.A.R.E.S.
appeal
within
ten
business
days
of
receiving
that
determination,
and
a
leadership
decision
ordinarily
within
twenty
business
days
of
appeal
receipt,
absent
extenuating
circumstances.

Identify
the
applicable
procedure
and

reconcile its requirements with the actual appeal history. The September 9 dismissal while a grade appeal reportedly remained unresolved requires the governing dismissal rule and decision chronology. [P3, p. 18; P4; P6–P7; L1]

Racial Discrimination and Retaliation Concerns

I am seriously concerned that

racial and disability bias affected the treatment of the Student, a Black woman with documented disabilities, including the credibility assigned to her reports and the response to her requests for assistance.

My declaration describes the conduct giving rise to that concern, including the

September 18 meeting. Title VI and University nondiscrimination policies provide the framework for examining communications, explanations, procedural departures, and comparable decisions in the same program and review posture. Relevant comparisons must protect other students’ identities and account for differences in circumstances. [P3, pp. 11–14,

62–73;

P8;

L3]

Protected

complaints,

witness

participation,

and

assistance

in

exercising

disability

rights

must

also

be

examined

for

retaliation

or

interference.

Review

should

identify

decisionmaker

knowledge,

subsequent

adverse

treatment,

stated

reasons,

and

evidence

connecting

the

treatment

to

protected

activity.

If

automated

proctoring

flags

influenced

a

decision,

assess

the

actual

technology

and

human

review;

research

on

Back

to

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22

another

institution’s

software

identifies

a

concern

to

investigate,

not

a

finding

about

Herzing’s

vendors.

[L4;

L4a–L4b;

P9;

S11]

Records

Access

and

Administrative

Follow

Through

FERPA

protects access to qualifying maintained education records of former students. Access must occur within a reasonable period, no later than forty-five days after receipt; reasonable requests for explanations must be answered, and copies or alternative arrangements are required when circumstances effectively prevent inspection. Responsive

education records may not be destroyed while a qualifying inspection request remains outstanding. [P5; L5; L5a]

The September 18 meeting record raises unresolved questions about appeal receipt, records availability, and responsibility for follow-up. Staff inability to produce a report does not resolve a request

to inspect existing responsive education records. Evaluate records by content and maintenance, including records held by contracted providers. Identify any lawful withholding and workable alternative access when a portal is disabled. FERPA does not require creation of a new report; the reconstruction and written

findings requested here arise from the institutional review. Preserve original request dates and apply the retention provisions addressed in the Evidence Preservation Letter. [P1, p. 24; P2; P3, p. 73; L5; L5c]

Scientific Context and Continuing Support Needs

My qualifications and direct observations

are set out in the Witness Declaration. Research on Autism, ADHD, anxiety, acute stress, and interruptions explains why disrupted attention, working memory, and cognitive flexibility can materially affect performance. Sensory research supports individualized assessment of distractions. These findings justify reviewing the actual testing conditions

and the Student’s documented limitations. [S1–S5]

Liston and colleagues observed impaired attentional control during sustained examination stress, with improvement after stress decreased.

McEwen describes cumulative strain across neuroendocrine, autonomic, immune, and metabolic systems.

Parker’s review of seventeen studies associated higher measured

allostatic load with greater mortality risk.

Research also associates reported racism with poorer health. These findings support taking the decline I observed seriously; they do not measure the Student’s allostatic load, establish individual medical causation, or predict her lifespan. [S6; S8–S10]

Sarah Millard Witness Submission (Oct 10, 2026) — Page 23 of 33

23

Administrative-burden research identifies learning, compliance, and psychological costs. Itt explains the demands of reconstructing events, resubmitting proof, and repeatedly locating a responsible official. The Student’s present support needs should inform participation arrangements, including a named contact, accessible written communication, reasonable response periods,

and assistance within her authorization. [S7; P1, p. 32; P3, pp. 65–68; L1–L2; L9]

Public Reports and Institutional Notice

The ProctorU petition alleges session failures, denied appeals, and refusals to honor approved accommodations. Other nursing petitions raise grading, disclosure, and progression concerns, including

alleged burdens on students of color. These recurring complaint subjects warrant checking prior institutional notice, vendor incident records, and corrective responses. [U1–U9]

Requested Institutional Response

Provide findings that resolve each pending submission, apply the governing requirements, and explain corrective action granted or denied.

[L5b]

Sincerely,

Sarah

Millard

sarah.e.millard@gmail.com

404.538.8805

October

10,

2026

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Exhibit

3A

Institutional

Policies

and

Legal

Authorities

Institutional

Policies

[P1]

Herzing

University

School

of

Nursing,

Prelicensure

Programs

Student

Handbook

2026,

SICCED09255468.HU.Prelicensure

Program

Student

Handbook.

Printed

pp.

8–9,

13,

18–25,

and

32–33:

program

scope,

accommodations,

grading,

communication,

progression,

examination

relief,

proctoring,

third-party

testing,

and

student

support.

Source

[P2]

Herzing

University,

Disability

Services,

Americans

with

Disabilities

Act

Policy.

Individual

accommodations,

requests

and

coordinator

meetings,

notice

of

ineffective

arrangements,

confidentiality,

and

disability-file

access.

Source

[P3]

Herzing

University,

Annual

Security

Report

2026,

Madison

publication.

Printed

pp.

11–14:

nondiscrimination

and

retaliation;

pp.

15–18:

accommodations

and

appeal;

pp.

62–73:

discrimination

process,

participation,

outcomes,

remedies,

and

retention.

Page

68

addresses

witness

and

process-advisor

roles.

Source

[P4]

Herzing

University,

Satisfactory Academic Progress. Graduate and nursing standards, warning, dismissal, academic appeal, probation, and academic plans.
Source

[P5]
Herzing University, Family Educational Rights and Privacy Act. Education-records inspection, amendment, confidentiality, and disclosure.
Source

[P6]
Herzing University, Academic Catalogs archive. Obtain the graduate editions and

addenda governing Summer 2025, Fall 2025, and Summer 2026, including the May 2025, September 2025, and May 2026 editions where applicable. Source

[P7] Herzing University, January 2026 Graduate Catalog, Academic Information. Historical reference for grade-appeal procedures; provide the complete text and the versions

applicable to the disputed terms. Source

[P8] Herzing University, Nondiscrimination Policy. Student treatment and University programs, including race and disability. Source

[P9] Herzing University, Online Proctoring. Published commitments on proctor-visible accommodation profiles, vendor ADA and FERPA compliance, University review of flags without automatic

penalties,

vendor

escalation,

and

restricted

student

recording

access.

Identify

the

applicable

historical

version

and

reconcile

access

restrictions

with

FERPA.

Source

Sarah Millard Witness Submission (Oct 10, 2026) — Page 25 of 33

25

Exhibit

3A

Legal

Authorities

Continued

[L1]

Section

504,

29

U.S.C.

§

794;

34

C.F.R.

§§

104.4,

104.7,

104.43,

and

104.44.

Covered-program

nondiscrimination,

grievance

procedures,

student

treatment,

and

academic

adjustments.

Source

[L2]

ADA

Title

III,

42

U.S.C.

§§

12181–12182;

28

C.F.R.

§

36.302(a).

Reasonable

modifications

in

covered

public

accommodations,

including

private

educational

institutions,

subject

to

fundamental-alteration

limits.

Source

[L3]

Title

VI,

42

U.S.C.

§

2000d;

34

C.F.R.

§

100.3.

Race,

color,

and

national-origin

discrimination

in

covered

federally

assisted

programs.

Source

[L4]

34

C.F.R.

§

100.7(e),

incorporated

through

§

104.61;

28

C.F.R.

§

36.206.

Retaliation,

intimidation,

coercion,

and

interference

connected

to

protected

rights

and

participation.

Source

[L5]

FERPA, 20 U.S.C. § 1232g; 34 C.F.R. §§ 99.3, 99.10, and 99.30. Covered maintained records, inspection, outstanding requests, and disclosure consent. Source

[L6] 34 C.F.R. § 668.34. Federal Title IV satisfactory academic progress standards and institutional financial-aid policies. Source

[L4a] 34 C.F.R. §

104.61,

incorporation

of

Title

VI

procedures.

Source

[L4b]

28

C.F.R.

§

36.206,

retaliation

and

coercion.

Source

[L5a]

34

C.F.R.

§

99.10,

inspection

and

outstanding

requests.

Source

[L5b]

34

C.F.R.

§

99.30,

prior

consent

for

disclosure.

Source

[L5c]

U.S.

Department

of

Education,

Protecting

Student Privacy, guidance on creation and retention of education records. FERPA does not require creation of new records; the outstanding-inspection-request restriction remains applicable.

Source

[L6a] U.S. Department of Education, Federal Student Aid Handbook 2025–2026, Volume 1, Chapter 1, School-Determined Requirements, SAP New and

Conflicting Information Requirements. Grade changes and scheduled SAP evaluations. Source

[L6b] U.S. Department of Education, Federal Student Aid Handbook 2026–2027, Volume 1, Chapter 1, School-Determined Requirements. Current counterpart to L6a; identify the edition governing each aid decision. Source

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26

[L7]

42 U.S.C. § 12102(2), (4). Major life activities and bodily functions; broad construction of disability; episodic impairments when active; evaluation generally without mitigating measures. Apply the pertinent disability and qualification standards to the documented facts. Source

[L8]

28 C.F.R. §

36.301(a)–(c). Disability-related eligibility criteria, legitimate safety requirements based on actual risks, and prohibition on surcharges for measures required to provide nondiscriminatory access. Ordinary tuition disputes require their own factual analysis. Source

[L9] 28 C.F.R. § 36.303(a), (c), (h). Appropriate auxiliary aids where necessary, effective

communication,

timely

accessible

formats

protecting

privacy

and

independence,

and

effective

alternatives

subject

to

fundamental-alteration

and

undue-burden

limits.

Source

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27

Exhibit

3B

Scientific

References

S1

through

S9

correspond

to

research

discussed

in

the

accompanying

Witness

Declaration.

S10

and

S11

provide

additional

context for discrimination-related stress and automated proctoring.

[S1] Alderson, R. M., Kasper, L. J., Hudec, K. L., & Patros, C. H. G. (2013). Attention-deficit/hyperactivity disorder (ADHD) and working memory in adults: A meta-analytic review. Neuropsychology, 27(3), 287–302. DOI 10.1037/a0032371. Source

[S2] Altmann, E.

M., Trafton, J. G., & Hambrick, D. Z. (2014). Momentary interruptions can derail the train of thought. Journal of Experimental Psychology: General, 143(1), 215–226. DOI 10.1037/a0030986.
Source

[S3] Moran, T. P. (2016). Anxiety and working memory capacity: A meta-analysis and narrative review. Psychological

Bulletin,

142(8),

831–864.

DOI

10.1037/bul0000051.

Source

[S4]

Shields,

G.

S.,

Sazma,

M.

A.,

&

Yonelinas,

A.

P.

(2016).

The

effects

of

acute

stress

on

core

executive

functions:

A

meta-analysis

and

comparison

with

cortisol.

Neuroscience

&

Biobehavioral

Reviews,

68,

651–668.

DOI

10.1016/j.neubiorev.2016.06.038.

Source

[S5]

Tavassoli,
T.,
Hoekstra,
R.
A.,
&
Baron-Cohen,
S.
(2014).
The
Sensory
Perception
Quotient
(SPQ):
Development
and
validation
of
a
new
sensory
questionnaire
for
adults
with
and
without
autism.
Molecular
Autism,
5,
29.
DOI
10.1186/2040-2392-5-29.
Source

[S6]
McEwen,
B.
S.
(2017).
Neurobiological
and
systemic
effects

of

chronic

stress.

Chronic

Stress,

1,

2470547017692328.

DOI

10.1177/2470547017692328.

Source

[S7]

Moynihan,

D.,

Herd,

P.,

&

Harvey,

H.

(2015).

Administrative

burden:

Learning,

psychological,

and

compliance

costs

in

citizen-state

interactions.

Journal

of

Public

Administration

Research

and

Theory,

25(1),

43–69.

DOI

10.1093/jopart/muu009.

Source

[S8]

Liston,

C., McEwen, B. S., & Casey, B. J. (2009). Psychosocial stress reversibly disrupts prefrontal processing and attentional control. Proceedings of the National Academy of Sciences, 106(3), 912–917. DOI 10.1073/pnas.0807041106. Source

[S9] Parker, H. W., Abreu, A. M., Sullivan, M. C., & Vadiveloo, M. K.

(2022).

Allostatic

load

and

mortality:

A

systematic

review

and

meta-analysis.

American

Journal

of

Preventive

Medicine,

63(1),

131–140.

DOI

10.1016/j.amepre.2022.02.003.

Review

of

seventeen

studies.

Source

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28

[S10]

Paradies,

Y.,

Ben,

J.,

Denson,

N.,

Elias,

A.,

Priest,

N.,

Pieterse,

A.,

Gupta, A., Kelaher, M., & Gee, G. (2015). Racism as a determinant of health: A systematic review and meta-analysis. PLOS ONE, 10(9), e0138511. DOI 10.1371/journal.pone.0138511. Source

[S11] Yoder-Himes, D. R., et al. (2022). Racial, skin tone, and sex disparities in automated proctoring software. Frontiers

in

Education,

7,

881449.

DOI

10.3389/feduc.2022.881449.

Study

of

Respondus.

Source

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29

Exhibit

3C

Public

Reports

and

Historical

Records

Student

Petitions

and

Public

Sharing

[U1]

Reddit,

r/ProctorU_Official,

“Petition

.

Replace

ProctorU

at

Herzing

University

—

It’s

Failing

Students.”

Links

to

U2;
the
post
and
petition
are
one
source
chain.
Source

[U2]
Change.org,
“Replace
ProctorU
at
Herzing
University
—
It’s
Failing
Students,”
April
19,
2026.
Alleges
failed
sessions,
denied
appeals,
conflicting
rescheduling
responsibility,
and
refusal
to
honor
documented
accommodations.
Verify
original
incidents
and
University
receipt.

Source

[U3] Change.org, “STOP the use of online proctoring services at HERZING UNIVERSITY & Other Universities,” December 24, 2021. Raises privacy, access, discrimination, and stress concerns. Source

[U4] Change.org, “Remove 76% Exam Average for Herzing Nursing Students,” July 27, 2023. BSN/ASN petition alleging

inadequate disclosure of an examination-average rule. Source

[U5] Change.org, “Reverse Unjust Grading Policy Changes at Herzing University,” September 8, 2024. A writer identifying as a nursing student of color alleges late grading changes and disproportionate burdens. Source

[U6] Change.org, “Require Herzing University to

Restructure Grading Systems," May 30, 2025. Nursing petition challenging examination weighting, instructional support, and alignment with taught material. Source

[U7] Change.org, "Remove the EXIT HESI Benchmark Score," December 25, 2025, with proposal dated December 20. Concerns MSN Direct Entry exit requirements, which must

be distinguished from NSG 523 assessment rules. Source

Historical Institutional Records

[U8] Ambrose-Frazier v. Herzing Inc., No. 2:15-cv-01324, E.D. Louisiana, Document 61, March 2016. Discovery order in litigation alleging employment race discrimination and retaliation. Source

[U9] Minnesota Attorney General, Fiscal Year 2014 Annual

Report,

printed

p.

26.

Reports

a

medical-assisting-program

investigation

and

settlement

addressing

disclosures

and

refund

options.

Source

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contents

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30

Evidence

Preservation

Letter

I

hereby

request

preservation

of

existing

records

concerning

Chavon

J.

Wright

(the

“Student”),

her

disability

accommodations,

NSG

523

enrollments and grades, appeals and complaints, September 9, 2026 dismissal, and associated academic and financial consequences. I submit this notice in my individual capacity as a witness to the continuing history described in my accompanying declaration.

Coordinate preservation across offices and vendors so

that ordinary deletion or overwriting does not remove records needed for the pending matters.

Relevant Period and Scope

Preserve relevant records from the Student's enrollment beginning in 2024 through the present, including later records concerning review of earlier events. This scope includes the

approximately eighteen-month accommodation and dispute history beginning in 2025. Preserve existing relevant information and ordinarily recoverable copies; identify any portion no longer maintained.

Categories to Preserve

Accommodation records: documentation receipts; requests; provisional, final, and revised plans; approval and effective dates; meeting records; distribution

and access histories; faculty and vendor instructions; and communications about inaccurate or ineffective implementation. Protect confidential medical information.

Coursework and grades: governing catalogs, nursing handbooks, syllabi and addenda; Canvas and Sherpath submissions and timestamps; rubrics, feedback, deadlines and extensions; assignment zeros or exclusions; gradebooks,

score conversions, assessment weights, corrections, and available audit trails for each NSG 523 enrollment.

Testing and vendor incidents: maintained recordings, audio, screen or session data, chats, proctor notes and flags, exam links, time settings, breaks, transfers, termination events, technical and support logs, accommodation

instructions, and escalations. Include relevant records held by Proctorio, ProctorU or Meazure Learning, and Elsevier where involved.

Appeals and complaints: submissions and attachments; receipts and case identifiers; failed-upload or delivery logs; routing histories; reviewer notes and communications; decisions; EthicsPoint or other complaint-system records; and

grade,

accommodation,

SAP,

reentry,

or

program-change

requests.

Preserve

the

actual

issues

and

attachments,

not

merely

a

case-status

entry.

Sarah Millard Witness Submission (Oct 10, 2026) — Page 31 of 33

31

Student

Services

and

the

September

18

meeting:

responsive

Salesforce

entries,

adviser

communications,

escalation

histories,

emails

and

messages;

the

complete

maintained

recording,

transcript,

chat,

attendance

record,

and

recording-delivery

or

access

history;

and

subsequent

appeal-proof

transmissions

and

follow-up.

Enrollment

and

finance:

progression

and

SAP

calculations,

academic

plans,

counted

course

failures,

dismissal

and

reentry

records,

program

evaluations,

tuition

and

fees,

payments,

credits,

refunds,

aid

adjustments,

and

related

changes

and

communications.

Access and retention: account and course-permission changes, exports, deletion or retention logs, governing retention schedules, preservation notices, and vendor retention instructions related to these records.

Preserve relevant decision explanations and comparator records within University review systems, with other students' information protected.

The

source narrative identifies institutional case 00542344, vendor ticket 7407283, and Canvas case 15367560. Please verify these identifiers and use them, together with the Student’s name, identifiers, courses, dates, and complainant records, to locate relevant information. Exhibits 2A–2C to the accompanying Witness Declaration provide additional

search context.

Preservation Method and Applicable Retention Rules

Suspend routine deletion, overwriting, or modification of relevant originals while applicable preservation duties and pending requests are assessed.

Preserve attachments, available version histories, and metadata sufficient to establish authorship, dates, delivery, routing, settings, and changes.

Retain native records and a usable export where appropriate. Preserve secure examination content internally even where disclosure would raise testing-security concerns; preservation and disclosure are separate questions.

The 2026 nursing handbook provides six-month retention of proctoring information with an exception for a specific

pending grade dispute. Determine which challenged assessments fall within that exception and notify relevant providers before scheduled deletion. The published discrimination process also provides indefinite retention of covered allegation, investigation, resolution, and hearing records. Identify the applicable versions and apply the relevant retention provisions.

[P1, p. 24; P3, p. 73]

FERPA separately prohibits destruction of covered education records while a qualifying inspection request is outstanding. Verify the original receipt and disposition of the Student’s reported December 2025 and later requests and preserve responsive records under 34 C.F.R. §

99.10(e).

This

notice

supplements

earlier

requests;

it

does

not

withdraw

them

or

restart

their

receipt

dates.

The

broader

dispute-preservation

requests

remain

distinct

from

education-records

inspection.

[P5;

L5]

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Sarah Millard Witness Submission (Oct 10, 2026) — Page 32 of 33

32

Unavailable

Records

and

Confirmation

If

relevant

information

is

no

longer

maintained, identify the category, custodian, governing retention rule, known loss or deletion date, reason, and any ordinary recoverable copy or export. If access was disabled but the records remain, preserve them and identify an alternative inspection method. Do not treat a disabled portal login

as resolving a records request.

Please acknowledge receipt and identify the coordinating custodian, offices and vendors notified, preservation steps taken, and any immediate retention risk by October 16, 2026. Report an imminent deletion risk promptly. This is a requested response target and does not

extend an existing records-access or other applicable deadline.

Direct substantive communications to the Student and include me to the extent authorized by her written consent.

Preserve this notice, its receipt and routing, and the University's response with the relevant matter.

Attached Exhibit 4A

provides
the
policy
and
legal
references
governing
retention,
records
inspection,
and
authorized
disclosure.

Sincerely,

Sarah
Millard
sarah.e.millard@gmail.com
404.538.8805

October
10,
2026

Sarah Millard Witness Submission (Oct 10, 2026) — Page 33 of 33

33

Exhibit
4A
Retention
and
Records
Access
Authorities

[P1]
Herzing
University
School
of
Nursing,
Prelicensure
Programs
Student

Handbook

2026,

SICCED09255468.HU.Prelicensure

Program

Student

Handbook.

Printed

pp.

8–9,

13,

18–25,

and

32–33:

program

scope,

accommodations,

grading,

communication,

progression,

examination

relief,

proctoring,

third-party

testing,

and

student

support.

Source

[P3]

Herzing

University,

Annual

Security

Report

2026,

Madison

publication.

Printed

pp.

11–14:

nondiscrimination

and

retaliation;

pp.

15–18:

accommodations

and

appeal;

pp.

62–73:

discrimination

process,

participation,

outcomes,

remedies,

and

retention.

Page

68

addresses

witness

and

process-advisor

roles.

Source

[P5]

Herzing

University,

Family

Educational

Rights

and

Privacy

Act.

Education-records

inspection,

amendment,

confidentiality,

and

disclosure.

Source

[L5]

FERPA,

20

U.S.C.

§

1232g;

34
C.F.R.
§§
99.3,
99.10,
and
99.30.
Covered
maintained
records,
inspection,
outstanding
requests,
and
disclosure
consent.
Source

[L5a]
34
C.F.R.
§
99.10,
inspection
and
outstanding
requests.
Source

[L5b]
34
C.F.R.
§
99.30,
prior
consent
for
disclosure.
Source

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CWRIGHT26 COMPLETE COMPENDIUM · VOLUME I

VOLUME I: HH 630 & HH 620 Graduate Health Sciences Syllabi, Curricular Alignment & Competency Blueprint

HERZING UNIVERSITY — GRADUATE SYLLABUS: HH 630 & HH 620

Program: **Master of Science in Health and Human Services Leadership (MS-HHSL)**
Institution: **Herzing University** — Online Division (in association with the Madison, Wisconsin Main Campus, 5218 East Terrace Drive, Madison, WI 53718; Administrative Offices: 275 W. Wisconsin Ave., Ste. 210, Milwaukee, WI 53203; Toll-Free: 1-800-596-0724)
Institutional Accreditation: Accredited by the **Higher Learning Commission (HLC)** (800-621-7440)
Delivery Modality & Session Structure: 100% Online via Herzing Canvas Learning Management System (LMS) | 8-Week Modular Sessions (No external fieldwork, clinicals, or proctored webcam testing required)

PART I: ORIGINAL INTEGRATED GRADUATE SYLLABUS TEXT (VERBATIM PRESERVATION)

📋 INTEGRATED MASTER GRADUATE SYLLABUS DOSSIER: HH 630 & HH 620
This comprehensive document consolidates all academic requirements, regional accreditation metrics, strict textbook ISBN registries, literature indexes, and granular assignment prompts for HH 630 and HH 620 within the Master of Science in Health and Human Services Leadership program at Herzing University.

🏛️ SECTION 1: MASTER COURSE EXPANSION — HH 630

1.1 Official Catalog Identity & Parameters

- Course Code: HH 630
- Course Title: Strategic Planning and Program Evaluation
- Academic Level: Graduate (Core Comprehensive's Requirement)
- Semester Credit Hours: 4.00 Credits
- Contact Hours Breakdown: 60 / 0 / 0 / 60 (60 Lecture Hours / 0 Lab Hours / 0 Practicum Hours / 60 Total Contact Hours)
- Prerequisites / Corequisites: None
- Official Catalog Description: This course focuses heavily on the foundational principles and hands-on practices of strategic framework construction within health and human service organizations. Key components include learning how to critically evaluate organizational missions, long-term goals, and structural environments; reviewing varied types of healthcare leadership hierarchies to optimize program delivery; applying ethical frameworks directly to management, programming, and service coordination; designing, launching, and managing strategic plans for multi-layered programs and projects; and executing systematic evaluations and data reviews to measure program efficacy and ensure all services align tightly with broader organizational values.

1.2 Required Course Textbooks & ISBN Registry

- Primary Text 1 (Strategic Planning Component):
  - Strategic Planning for Public and Nonprofit Organizations: A Guide to Strengthening and Sustaining Organizational Achievement
  - Authors: John M. Bryson and Bert George
  - Edition/Year: 6th Edition (2024)
  - Publisher: John Wiley & Sons
  - ISBN-13: 978-1119741510 / ISBN-10: 1119741510
- Primary Text 2 (Program Evaluation Component):
  - Program Evaluation: Methods and Case Studies

- Authors: Kenneth J. Linfield and Emil J. Posavac
- Edition/Year: 9th Edition (2018)
- Publisher: Routledge
- ISBN-13: 978-1138103634 / ISBN-10: 1138103632

1.3 Course Competencies & Institutional Grading Standards
Assignments are evaluated using formal matrixes mapped to professional public health and human services leadership standards. Students must demonstrate proficiency across five core competencies:

1. Strategic Assessment: Advanced ability to analyze an organization's existing mission statement, long-term operational goals, and systemic micro/macro structural environments.
2. Organizational Hierarchy Review: Competence in examining how healthcare leadership structures and reporting channels affect overall program delivery efficiency.
3. Ethical Decision Matrices: Advanced execution of multi-lens ethical frameworks applied directly to management practices, budget deficits, and regional service coordination.
4. Program Implementation Project: Proficiency of structural rollout strategies, timeline dependencies, personnel requirements, and budget boundary management for new social initiatives.
5. Data Evaluation System: Design capability for quantitative and qualitative data collection methods to evaluate program efficacy, guarantee data validity, and ensure long-term alignment with organizational values.

1.4 Week-by-Week Scaffolding & Granular Assignment Prompts

- Weeks 1–2 Milestone: Environmental PESTLE & SWOT Matrix Audit
  - Prompt Detail: Select a real or hypothetical healthcare/human services organization. You are required to research and build a highly structured, data-supported environmental scan. The analysis must formally evaluate regional regulatory changes, labor shortfalls, local economic realities, and technology gaps. You must conclude with a comprehensive evaluation of how well the organization’s current activities match its official public mission statement.
  - Twice the Detail: This milestone mandates an un-redacted SWOT (Strengths, Weaknesses, Opportunities, Threats) and PESTLE (Political, Economic, Social, Technological, Legal, Environmental) analytical dashboard. You must extract empirical data points—such as regional healthcare labor shortage statistics, state Medicaid reimbursement updates, and localized socioeconomic trend lines. The document must culminate in a 1,500-word critical audit that evaluates whether the organization's current field activities, capital expenditures, and clinic footprints strictly support or actively diverge from its official public-facing mission statement.
- Weeks 3–4 Milestone: Leadership Hierarchy & Authority Flow Analysis
  - Prompt Detail: Draft a comparative analysis contrasting a hierarchical/bureaucratic management structure with a flat/functional structure. You must submit an organization chart map illustrating exactly where operational communication delays and bottlenecks occur when launching a public program initiative.
  - Twice the Detail: This project requires the creation of two functional, visual organizational charts mapping a multi-tiered healthcare network. Chart A must depict a highly centralized, bureaucratic hierarchy; Chart B must map a decentralized, matrixed multidisciplinary layout. Alongside these charts, you must author an explicit structural analysis detailing exact operational bottleneck indicators. You must trace how an administrative directive travels from executive leadership down to frontline caseworkers, identifying specific delay points in authority, checking communication friction, and recommending optimized reporting paths to accelerate new service delivery.
- Week 5 Milestone: Multi-Lens Ethical Resolution Brief
  - Prompt Detail: Analyze an administrative crisis scenario involving severe resource constraints (e.g., a sudden 30% reduction in federal grant funds forcing a clinic to ration vital community services). You must write an executive brief running the crisis through distinct ethical frameworks (utilitarianism vs. deontology) to justify and defend your ultimate policy choice.
  - Twice the Detail: You are placed into a high-stakes executive crisis scenario: your organization has sustained a immediate, non-negotiable 30% reduction in federal grant funding, forcing an immediate rationing of vital community services (e.g., local opioid treatment or low-income maternal care). Your submitted executive brief must run this crisis through distinct ethical decision-making frameworks. You must

contrast a Utilitarian calculation (maximizing the greatest good for the largest number of clients by cutting high-cost individual treatments) against a Deontological framework (adhering to absolute duty and rights regardless of cost metrics). The final brief must explicitly state and defend your operational policy choice, detailing risk mitigation tactics for the displaced client populations.

- Weeks 6–7 Milestone: Scaffolded Program Implementation & Project Plan
    - Prompt Detail: Act as a newly appointed program director and draft a rollout manual for a fresh social or health initiative. Your project manual must detail: a comprehensive timeline chart with logical task dependencies, explicit personnel requirements, target audience community marketing efforts, and strict fiscal budget constraints.
    - Twice the Detail: Operating as a senior program director, you will draft an institutional rollout manual for a new public service initiative (such as a mobile health van or a community mental health outpatient pilot). This manual must contain: a granular 12-month implementation timeline utilizing Gantt chart logic to show step dependencies; a comprehensive staffing plan defining roles, credentials, and full-time equivalent (FTE) calculations; a targeted community outreach and marketing strategy for vulnerable populations; and a comprehensive fiscal budget detailing initial startup costs, variable operational expenses, and projected revenue or grant renewal targets.
- Week 8 Milestone: The Technical Program Evaluation System
    - Prompt Detail: Create a comprehensive auditing model to measure your program's efficiency and success. The final document must detail your precise quantitative performance metrics (such as client recidivism percentages or intake cycle times), your scheduled qualitative touchpoints (such as focus groups), and a permanent data feedback loop for continuous quality improvement.
    - Twice the Detail: The capstone assignment of HH 630 requires the complete creation of an objective evaluation matrix designed to prove program efficacy to stakeholders and grant boards. Your system must detail: precise quantitative Key Performance Indicators (KPIs) (e.g., client readmission rates, clinical intake processing times, cost-per-encounter ratios); structured qualitative data touchpoints (e.g., patient focus group templates and semi-structured interview protocols); a detailed data validity protection plan to minimize measurement bias; and an active continuous quality improvement (CQI) loop that explains how evaluation data will automatically trigger operational adjustments.

1.5 HH 630 Secondary/Additional Reading Materials

- Centers for Disease Control and Prevention. (1999). Framework for program evaluation in public health. MMWR Recommendations and Reports, 48(RR-11), 1-40.
- Wholey, J. S., Hatry, H. P., & Newcomer, K. E. (2010). Handbook of practical program evaluation (3rd ed.). Jossey-Bass.

1.6 HH 630 APA References (7th Edition)

- Bryson, J. M., & George, B. (2024). Strategic planning for public and nonprofit organizations: A guide to strengthening and sustaining organizational achievement (6th ed.). John Wiley & Sons.
- Linfield, K. J., & Posavac, E. J. (2018). Program evaluation: Methods and case studies (9th ed.). Routledge.

🏛️ SECTION 2: MASTER COURSE EXPANSION — HH 620

2.1 Official Catalog Identity & Parameters

- Course Code: HH 620
- Course Title: Leadership and Multidisciplinary Teams
- Academic Level: Graduate (Core Comprehensive's Requirement)
- Semester Credit Hours: 3.00 Credits
- Contact Hours Breakdown: 45 / 0 / 0 / 45 (45 Lecture Hours / 0 Lab Hours / 0 Practicum Hours / 45 Total Contact Hours)
- Official Catalog Description: This course focuses on developing advanced leadership skills, communication frameworks, multidisciplinary team management, and burnout prevention strategies in health and human services.

2.2 Required Course Textbooks & ISBN Registry

- Primary Text 1: Leadership: Theory and Practice (9th ed., 2021) by Peter G. Northouse (SAGE, ISBN 978-1544397566).
- Primary Text 2: Leadership in Human Services: How to Lead and Manage Effective Networks (1st ed., 2015) by Rufus Sylvester Lynch (Oxford, ISBN 978-0190214340).

2.3 Course Competencies & Institutional Grading Standards

1. Style Diagnostics, 2. Team Management Case Studies, 3. Change-Monitoring Exercises, 4. Burnout Prevention Planning.

2.4 Week-by-Week Scaffolding & Granular Assignment Prompts

- Weeks 1–2: Leadership Self-Assessment & Behavioral Profile (Detailed comparative behavioral profile and workplace friction analysis).
- Weeks 3–4: Inter-Departmental Conflict Case Study (Stakeholder power/interest matrix and mediation protocol).
- Weeks 5–6: Institutional Change Management Blueprint (Readiness assessment and phased rollout plan).
- Weeks 7–8: Workforce Attrition & Burnout Prevention Plan (Caseload formulas and peer support protocols).

2.5 HH 620 Secondary/Additional Reading Materials

- Kotter, J. P. (2012). Leading change. Harvard Business Review Press.
- Maslach, C., & Leiter, M. P. (2016). Understanding the burnout experience. World Psychiatry, 15(2), 103-111.

2.6 HH 620 APA References (7th Edition)

- Lynch, R. S. (2015). Leadership in human services. Oxford University Press.
- Northouse, P. G. (2021). Leadership: Theory and practice. SAGE Publications.

🔒 SECTION 3: SYSTEM CURRICULUM DISCLOSURE
Internal datasets and grading rubrics are available via the Herzing Canvas LMS.

PART II: PROGRAM ARCHITECTURE, FACULTY DIRECTORY, & CREDENTIALING METRICS

2.1 Master of Science in Health and Human Services Leadership (MS-HHSL) Program Overview

Per the **Herzing University MS-HHSL Program Specification**, the Master of Science in Health and Human Services Leadership is a 31.00-semester-credit graduate degree designed to prepare behavioral health, social service, and healthcare practitioners to advance into executive, management, and program leadership positions.

- Total Program Credits: 31.00 Semester Credit Hours (10 required courses; 9 three-credit courses and 1 four-credit course)
- Standard Completion Timeline: 12 Months (3 full-time 16-week semesters divided into six 8-week modular sessions)
- Modality & Proctoring Specification: 100% Online asynchronous instruction delivered via Canvas LMS; zero required field practicums, clinical hours, or third-party webcam proctoring platforms
- Tuition & Resource Fee Structure: $630.00 per semester credit hour ($19,530.00 base tuition; up to 12.00 graduate transfer credits permitted at a savings of $7,560.00; $555.00 per-semester Learner Resource Fee covering all digital VitalSource textbooks and courseware)
- Career & Labor Market Alignment: Prepares graduates for Social and Community Service Manager roles (U.S. Bureau of Labor Statistics median wage: $86,100/year or $41.39/hour; projected 7% employment growth from 2025–2035) (**Herzing MS-HHSL Program**).

Course Code	Official Catalog Course Title	Credits	Contact Hours	Core Curricular Focus & Verbatim Catalog Scope
HH 500	Foundations of Health and Human Services Management	3.00	45 Lecture	Historical evolution, ethical foundations, community resource assessment, state/federal laws, and organizational service delivery across disciplines (**Herzing MS-HHSL**).
HH 510	Inquiry and Information Literacy	3.00	45 Lecture	Research methodologies, technology tools, ethical human subject research standards, evidence-based advocacy, and emerging human services trends (**Herzing MS-HHSL**).
HH 600	Communication in Health and Human Services	3.00	45 Lecture	Communication theories, accessible strategies for diverse populations, public health dissemination channels, cultural intelligence, and health literacy (**Herzing MS-HHSL**).
HH 610	Planning and Fiscal Management	3.00	45 Lecture	Financial planning tools, operational budget construction, reporting/logging practices, stakeholder budget communication, and grant opportunity evaluation (**Herzing MS-HHSL**).
HH 620	**Leadership and Multidisciplinary Teams**	3.00	45 Lecture	Advanced leadership skills, communication/leadership styles, internal/external multidisciplinary team management, change monitoring, and burnout prevention (**HH 620 Catalog**).
HH 630	Strategic Planning and Program Evaluation	4.00	60 Lecture	Organizational mission/goal analysis, leadership structure assessment, ethical decision-making, program strategy implementation, and systematic evaluation (**Herzing MS-HHSL**).
HH 690	Capstone	3.00	45 Lecture	Final program project demonstrating application, analysis, integration, and evaluation in a real-world project or simulation (**Herzing MS-HHSL**).
MSW 510	Perspectives on Diversity and Global Society	3.00	45 Lecture	Ecological and social justice theories, DEI vs. equality, individual/institutional/structural discrimination, reflective practice, cultural humility, and intersectionality (**Herzing MS-HHSL**).
MSW 521	Generalist Practice with Organizations/Community	3.00	45 Lecture	Direct social work theories for groups/communities, clinical supervision and management impacts on client outcomes, and NASW Code of Ethics in macro/mezzo/micro practice (**Herzing MS-HHSL**).
MSW 540	Social Policy and Services	3.00	45 Lecture	Federal, state, and local social policy analysis, advocacy, and development across poverty, child welfare, aging, veterans, healthcare, mental health, and justice systems (**Herzing MS-HHSL**).

2.2 Program Leadership & Potential Graduate Instructors Directory

The following program chairs, academic administrators, and graduate faculty members hold terminal or comprehensive's credentials in behavioral health, social work, public health, health administration, and organizational leadership at Herzing University (**Herzing MS-HHSL Program**, **Herzing Graduate Faculty Listing**):

Faculty / Administrator Name	Institutional Title & Role	Earned Degrees & Granting Institutions	Relevant Course Alignment (HH 630 / HH 620 / MS-HHSL)
Dr. Chadwick Church, PsyD ("Dr. C")	Program Chair — Health and Human Services	Psy.D. (Psychology); recipient of Applied Doctoral Project of the Year Award (**Herzing MS-HHSL**)	Direct Program Chair overseeing HH 500, HH 510, HH 600, HH 610, HH 620, HH 630, and HH 690 curriculum and instruction.
Dr. Elizabeth Wilson, PhD, MSW	Professor & Program Chair — Social Work	Ph.D. (Social Work), M.S.W. (Social Work), B.E.S. (Education & Counseling Psychology), University of Missouri-Columbia (**Graduate Faculty PDF**)	Program Chair overseeing interdisciplinary MSW 510, MSW 521, and MSW 540 courses and macro social work leadership.
Dr. Sarah Olson, PhD	Assistant Professor & Program Chair — Healthcare Online	Ph.D. (Healthcare Administration) (**Herzing Health Sciences**, **Faculty Listing PDF**)	Program Chair for Healthcare Administration and Health Sciences; interdisciplinary alignment with HH 630 and HH 620.
Dr. David Steele, JD	Associate Vice President of Academic Affairs / Professor & Department Chair	J.D. (Law), Florida Coastal School of Law (**Herzing Catalog**, **Faculty Listing PDF**)	Senior academic affairs leadership, graduate transfer credit pre-approvals, and institutional policy oversight.
Dr. Hyacinth McKee, DBH, MSW	Professor (Full-Time Graduate Faculty)	D.B.H. (Behavioral Health), Arizona State University; M.S.W., Southern University of New Orleans; B.A. (Sociology), Xavier University (**Graduate Faculty PDF**)	Behavioral health leadership, multidisciplinary care integration, and community social work (HH 620, HH 630, MSW 510–540).
Dr. KaRon Spriggs-Bethea, DSW, MSW	Adjunct Professor (Graduate Faculty)	D.S.W. (Social Work), Capella University; M.S.W., University of Pittsburgh; B.A. (Sociology/ Psychology), Washington & Jefferson College (**Graduate Faculty PDF**)	Human services network administration, social policy, and clinical/macro team leadership (HH 620, HH 630, MSW 521).
Dr. Thomas Chalmers McLaughlin, PhD, MSW	Adjunct Professor (Graduate Faculty)	Ph.D. (Criminal Justice & Social Policy), Union Institute & University; M.S.W., University of New England; B.A. (Sociology), Univ. of Southern Maine (**Graduate Faculty PDF**)	Social policy evaluation, program evaluation methodology, and agency strategic planning (HH 630, MSW 540).
Dr. Dorothy Jimenez, DM, MSW	Adjunct Professor (Graduate Faculty)	D.M. (Organizational Management), University of Phoenix; M.S.W. & B.A. (Social Work), Colorado State University (**Graduate Faculty PDF**)	Organizational hierarchy analysis, strategic management, and human services team leadership (HH 620, HH 630).
Prof. Stephanie Parsons, MSW, BSW	Adjunct Professor (Graduate Faculty)	M.S.W. & B.S.W. (Social Work), University of Missouri-Columbia; B.S.W., University of Wyoming (**Graduate Faculty PDF**)	Community practice, agency service coordination, and social work supervision (HH 620, MSW 521).
Prof. Nichole Schoonover, MSW, BSW	Adjunct Professor (Graduate Faculty)	M.S.W. (Social Work), Washington University in St. Louis; B.S.W., William Woods University (**Graduate Faculty PDF**)	Program evaluation, multidisciplinary case coordination, and burnout prevention (HH 620, HH 630).

Faculty / Administrator Name	Institutional Title & Role	Earned Degrees & Granting Institutions	Relevant Course Alignment (HH 630 / HH 620 / MS-HHSL)
Dr. Julie Zeno, PhD, MSW	Adjunct Professor (Graduate Faculty)	Ph.D. (Biblical Psychology), The Hope Bible College; M.S.W. (Social Work), Grambling State University (**Graduate Faculty PDF**)	Behavioral health counseling, multidisciplinary team dynamics, and diversity practice (HH 620, MSW 510).
Dr. Kristen Dickerson, PhD, MSN	Professor (Full-Time Graduate Faculty)	Ph.D. (Public Health), Walden University; M.S.N. (Public Health Nursing), Walden University; B.S. (Microbiology), Ohio University (**Graduate Faculty PDF**)	CDC public health evaluation frameworks, epidemiological needs assessment, and program evaluation (HH 630).
Dr. Dawn Ide, DHA, MS	Adjunct Professor (Graduate Faculty)	D.H.A. (Health Administration), Walden University; M.S. (Health Care Administration) & B.S. (Psychology), King's College (**Graduate Faculty PDF**)	Healthcare strategic planning, PESTLE/SWOT environmental scanning, and health systems governance (HH 630, HH 610).
Dr. Michael Holway, DHA	Adjunct Associate Professor (Graduate Faculty)	D.H.A. (Health Administration), Capella University (**Graduate Faculty PDF**)	Health systems administration, organizational structure design, and quality improvement (HH 630).
Dr. Jindriska Vesela, DHA, MS	Adjunct Assistant Professor (Graduate Faculty)	D.H.A. (Health Administration) & M.S. (Leadership Coaching Psychology), Capella University (**Graduate Faculty PDF**)	Leadership style diagnostics, executive coaching psychology, and multidisciplinary team mediation (HH 620).
Dr. Gary Hanney, DBA, MBA	Adjunct Associate Professor (Graduate Faculty)	D.B.A. (Management, Healthcare Administration), Argosy University; M.B.A., Wayland Baptist University (**Graduate Faculty PDF**)	Fiscal budgeting, strategic management, and healthcare operational rollout (HH 610, HH 630).
Dr. Kasey Ingram Jechura, EdD, MA	Adjunct Associate Professor (Graduate Faculty)	Ed.D. (Organizational Leadership) & M.A. (Marriage and Family Therapy), Argosy University (**Graduate Faculty PDF**)	Organizational leadership theory, inter-departmental conflict mediation, and family systems (HH 620).
Dr. Michelle Larson, PhD, MPA	Adjunct Assistant Professor (Graduate Faculty)	Ph.D. (Philosophy) & M.P.A. (Public Affairs), University of Minnesota; B.S. (Health Promotion), University of Wisconsin (**Graduate Faculty PDF**)	Ethical decision matrices (utilitarianism vs. deontology), public affairs strategic planning, and health promotion (HH 630).

PART III: COMPREHENSIVE SYLLABUS EXPANSION — HH 630: STRATEGIC PLANNING AND PROGRAM EVALUATION

3.1 Official Verbatim Website & Catalog Course Description Comparison

- Herzing University MS-HHSL Website Description (4.00 Credits): "This course focuses on the principles and practices of strategic planning and program evaluation within the health and human services field. Students will learn to analyze organizational missions and goals, assess various types of organizations and leadership structures, and apply ethical decision-making skills. The course emphasizes the development and implementation of strategic

strategies for programs and projects, conducting thorough evaluations to ensure effectiveness, and alignment with organizational values and services." (**Herzing MS-HHSL Program**).

- Credit Hour & Time Commitment Specification: Per the **Herzing University Graduate Catalog Credit Hour Policy**, each online semester credit hour requires a minimum of 45 hours of academic engagement. As a 4.00-credit course delivered over an 8-week modular session, HH 630 requires 180 total hours of academic engagement (approximately 22.5 hours per week of reading, environmental data collection, discussion board interaction, strategic plan drafting, and evaluation matrix construction).

3.2 Deep-Dive Textbook & Secondary Literature Breakdown (HH 630)

A. Primary Text 1: Bryson & George (2024) — Strategic Planning for Public and Nonprofit Organizations (6th Edition)

- Bibliographic & Publisher Registry: John M. Bryson (McKnight Presidential Professor Emeritus, Hubert H. Humphrey School of Public Affairs, University of Minnesota) and Bert George (Professor in Public Management, Department of Public and International Affairs, City University of Hong Kong; former Editor of Public Administration Review). Published July/August 2024 by **John Wiley & Sons**, 592 pages. Catalog Syllabus ISBN-13: 978-1119741510 / ISBN-10: 1119741510; Wiley 2024 Print Hardcover ISBN-13: 978-1-394-27402-4 ($79.00); Wiley VitalSource E-Book ISBN-13: 978-1-394-27403-1 ($63.00, included via Herzing Learner Resource Fee).
- Core Theoretical Model — Bryson's 10-Step Strategy Change Cycle (**Penn State PADM 516**, **MBA Knowledge Base**):
    - Step 1: Initiate and agree on a strategic planning process (negotiating agreement with internal/external decision-makers and coalitions).
    - Step 2: Identify organizational mandates (formal and informal statutory, charter, regulatory, and grant requirements).
    - Step 3: Clarify organizational mission and values (stakeholder analysis and public value proposition).
    - Step 4: Assess the external and internal environments to identify strengths, weaknesses, opportunities, and threats/challenges (SWOT and PESTLE monitoring).
    - Step 5: Identify the strategic issues facing the organization (fundamental policy questions affecting mandates, mission, service level, financing, structure, or management).
    - Step 6: Formulate strategies to manage the issues (five-part strategy development process and logic modeling).
    - Step 7: Review and adopt the strategic plan or plans (building coalitions of support and formal executive/board enactment).
    - Step 8: Establish an effective organizational vision (vision of success for implementation).
    - Step 9: Develop an effective implementation process (action plans, Gantt schedules, staffing FTEs, budgets, and direct/staged implementation).
    - Step 10: Reassess strategies and the strategic planning process (continuous quality monitoring and institutional learning).
- Complete Verified Table of Contents (**Wiley 6th Edition Official TOC**):
    - Part One: Understanding the Dynamics of Strategic Planning (pp. 1–80)
        - Chapter 1: Why Strategic Planning Is More Important Than Ever (pp. 3–36)
        - Chapter 2: The Strategy Change Cycle: An Effective Strategic Planning and Management Approach for Public and Nonprofit Organizations (pp. 37–80)
    - Part Two: Key Steps in Thinking, Acting, and Learning Strategically (pp. 81–378)
        - Chapter 3: Initiating and Agreeing on a Strategic Planning Process (pp. 83–122)
        - Chapter 4: Clarifying Organizational Mandates, Mission, and Values (pp. 123–152)
        - Chapter 5: Assessing the Environment to Identify Strengths, Weaknesses, Opportunities, and Challenges or Threats (pp. 153–194)
        - Chapter 6: Identifying Strategic Issues Facing the Organization (pp. 195–234)
        - Chapter 7: Formulating and Adopting Strategies and Plans to Manage the Issues (pp. 235–288)
        - Chapter 8: Establishing an Effective Organizational Vision for the Future (pp. 289–302)
        - Chapter 9: Implementing Strategies and Plans Successfully (pp. 303–352)

        - Chapter 10: Reassessing and Revising Strategies and Plans (pp. 353–378)
    - Part Three: Managing the Process and Getting Started With Strategic Planning (pp. 379–432)
        - Chapter 11: Leadership Roles in Making Strategic Planning Work (pp. 381–410)
        - Chapter 12: Getting Started with Strategic Planning (pp. 411–432)
    - Part Four: Resources (pp. 433–498)
        - Resource A: A Guide to Stakeholder Identification and Analysis Techniques (pp. 435–458)
        - Resource B: Digital Tools, Artificial Intelligence, and Big Data in the Strategic Planning Process (pp. 459–498)

B. Primary Text 2: Linfield & Posavac (2018) — Program Evaluation: Methods and Case Studies (9th Edition)

- Bibliographic & Publisher Registry: Kenneth J. Linfield (Professor Emeritus of Psychology and former Director of Graduate Training, School of Professional Psychology, Spalding University) and Emil J. Posavac (Professor Emeritus of Psychology, Loyola University Chicago). Published 2018/2019 by **Routledge / Taylor & Francis**. Hardcover ISBN-13: 978-1138103634 / ISBN-10: 1138103632; Paperback/E-Book ISBN-13: 978-1138103962 / 978-1315102429 (10th Edition published January 2025 with Steven D. Kniffley, Jr., **Routledge**, ISBN 978-1032447209).
- Core Theoretical Model — The Four Major Evaluation Types & The MISSION! Framework (**Routledge**, **Scribd 9th Ed.**):
    - Four Core Evaluation Pillars: (1) Evaluation of Need (identifying unmet community/client needs); (2) Process/Implementation Evaluation (verifying service delivery fidelity and monitoring operations); (3) Outcome Evaluation (measuring client improvements and unintended side effects across single-group, quasi-experimental, and experimental designs); and (4) Efficiency/Cost Evaluation (cost-effectiveness and cost-benefit ratios).
    - The MISSION! Framework: Meeting needs, Implementation, Stakeholders, Side effects, Improvement focus, Outcomes, Nuances, and underpinning ! (Diversity, Equity, and Cultural Responsiveness).
- Complete Verified 14-Chapter Table of Contents (**Routledge TOC**, **OHSU Library Catalog**):
    - Chapter 1: Program Evaluation: An Overview (Evaluation areas, dysfunctional attitudes toward evaluation, evaluator roles, internal vs. external evaluators)
    - Chapter 2: Planning an Evaluation (Evaluation models, improvement-focused approach, engaging stakeholders, preparing for evaluation)
    - Chapter 3: Developing and Using a Theory of the Program (Program logic models, inputs, activities, outputs, short/long-term outcomes, implausible program theories)
    - Chapter 4: Developing Measures of Implementation and Outcomes (Data sources, psychometric reliability, validity, floor/ceiling effects, reactive vs. nonreactive measures)
    - Chapter 5: Ethics in Program Evaluation (Protection of human subjects, IRB oversight, informed consent, confidentiality, competing stakeholder interests, ethical validity threats)
    - Chapter 6: The Assessment of Need (Definitions of need, epidemiological/census indicators, community surveys, key informants, focus groups)
    - Chapter 7: Monitoring the Implementation and the Operation of Programs (Management information systems, service utilization logs, dropout/attrition tracking, fidelity audits)
    - Chapter 8: Qualitative Evaluation Methods (Observation, semi-structured interviews, focus groups, thematic coding, qualitative rigor)
    - Chapter 9: Outcome Evaluations with One Group (Pretest-posttest designs, internal validity threats: history, maturation, testing, instrumentation, statistical regression, attrition)
    - Chapter 10: Quasi-Experimental Approaches to Outcome Evaluation (Nonequivalent control group designs, interrupted time-series designs, regression discontinuity)
    - Chapter 11: Using Experiments to Evaluate Programs (Randomized controlled trials in human services, ethical challenges of randomization, waitlist controls)
    - Chapter 12: Analyses of Costs and Outcomes (Cost-accounting, cost-effectiveness analysis, cost-benefit analysis, disability-adjusted/quality-adjusted life years)
    - Chapter 13: Evaluation Reports: Interpreting and Communicating Findings (Structuring executive summaries, visual dashboards, addressing negative findings)

- Chapter 14: How to Encourage Utilization (Overcoming resistance to change, building continuous quality improvement [CQI] feedback loops, institutionalizing evaluation)

C. Secondary Reading 1: CDC (1999 / 2024 Update) — Framework for Program Evaluation in Public Health

- Bibliographic & Full-Text Access: Centers for Disease Control and Prevention, prepared by Robert L. Milstein, MPH, and Scott F. Wetterhall, MD, MPH (1999), MMWR Recommendations and Reports, 48(RR-11), 1–40 (**CDC MMWR Full Text**, **PubMed PMID 10499397**), alongside the September 2024 modernized revision (**CDC Program Evaluation Framework, 2024, MMWR 73(RR-6)**).
- The Six Interdependent Steps in Evaluation Practice (**CDC MMWR Box 1**):
  - Step 1: Engage Stakeholders — Those involved in program operations (sponsors, administrators, staff), those served or affected by the program (clients, advocacy groups, skeptics/opponents), and primary users of the evaluation.
  - Step 2: Describe the Program — Need, expected effects (short-term, intermediate, long-term), activities, resources, stage of development (planning, implementation, effects), context, and explicit logic model.
  - Step 3: Focus the Evaluation Design — Purpose (gain insight, change practice, assess effects, affect participants), users, uses, evaluation questions, methods, and formal written agreements.
  - Step 4: Gather Credible Evidence — Indicators, sources (persons, documents, observations), quality, quantity, and data logistics.
  - Step 5: Justify Conclusions — Standards of merit/worth/significance, quantitative/qualitative analysis and synthesis, interpretation, judgment, and actionable recommendations.
  - Step 6: Ensure Use and Share Lessons Learned — Design for utilization, preparation, continuous feedback, follow-up meetings, and tailored dissemination.
- The 30 ANSI-Approved Standards for Effective Evaluation Grouped into Four Domains (**CDC MMWR Boxes 13–17**):
  - Group 1: Utility Standards (7 Standards) — Stakeholder identification, Evaluator credibility, Information scope and selection, Values identification, Report clarity, Report timeliness and dissemination, Evaluation impact.
  - Group 2: Feasibility Standards (3 Standards) — Practical procedures, Political viability, Cost-effectiveness.
  - Group 3: Propriety Standards (8 Standards) — Service orientation, Formal agreements, Rights of human subjects, Human interactions, Complete and fair assessment, Disclosure of findings, Conflict of interest, Fiscal responsibility.
  - Group 4: Accuracy Standards (12 Standards) — Program documentation, Context analysis, Described purposes and procedures, Defensible information sources, Valid information, Reliable information, Systematic information, Analysis of quantitative information, Analysis of qualitative information, Justified conclusions, Impartial reporting, Metaevaluation.

D. Secondary Reading 2: Wholey, Hatry, & Newcomer (2010) — Handbook of Practical Program Evaluation (3rd Edition)

- Bibliographic & Full-Text Registry: Joseph S. Wholey (USC), Harry P. Hatry (Urban Institute), and Kathryn E. Newcomer (George Washington University), Eds. (2010). Handbook of Practical Program Evaluation (3rd ed., **Jossey-Bass / Wiley**, ISBN 978-0-470-52247-9, 752 pages; Open-Access PDF via **Eval.fr**).
- Complete Verified 28-Chapter Table of Contents (**Wiley 3rd Edition TOC**):
  - Part One: Evaluation Planning and Design — Ch. 1: Planning and Designing Useful Evaluations (Newcomer, Hatry, Wholey); Ch. 2: Analyzing and Engaging Stakeholders (Bryson, Patton); Ch. 3: Using Logic Models (McLaughlin, Jordan); Ch. 4: Exploratory Evaluation (Wholey); Ch. 5: Performance Measurement: Monitoring Program Outcomes (Poister); Ch. 6: Comparison Group Designs (Henry); Ch. 7: Randomized Controlled Trials and Nonrandomized Designs (Torgerson et al.); Ch. 8: Conducting Case Studies (Martinson, O'Brien); Ch. 9: Recruitment and Retention of Study Participants (Cook et al.); Ch. 10: Designing, Managing, and Analyzing Multisite Evaluations (Rog).
  - Part Two: Practical Data Collection Procedures — Ch. 11: Using Agency Records (Hatry); Ch. 12: Using Surveys (Newcomer, Triplett); Ch. 13: Using Trained Observer Ratings (Cohn Berman et al.); Ch. 14: Collecting Data in the Field (Nightingale, Rossman); Ch. 15: Using the Internet (Adams); Ch. 16: Conducting Semi-Structured

Interviews (Adams); Ch. 17: Focus Group Interviewing (Krueger, Casey); Ch. 18: Using Stories in Evaluation (Krueger).

- Part Three: Data Analysis — Ch. 19: Qualitative Data Analysis (Rogers, Goodrick); Ch. 20: Using Statistics in Evaluation (Newcomer, Conger); Ch. 21: Cost-Effectiveness and Cost-Benefit Analysis (Cellini, Kee); Ch. 22: Meta-Analyses, Systematic Reviews, and Evaluation Syntheses (Boruch, Petrosino).
- Part Four: Use of Evaluation — Ch. 23: Pitfalls in Evaluations (Hatry, Newcomer); Ch. 24: Providing Recommendations, Suggestions, and Options for Improvement (Grob); Ch. 25: Writing for Impact (Grob); Ch. 26: Contracting for Evaluation Products and Services (Bell); Ch. 27: Use of Evaluation in Government: The Politics of Evaluation (Wholey); Ch. 28: Evaluation Challenges, Issues, and Trends (Hatry, Wholey, Newcomer).

3.3 HH 630 Weekly Modular Schedule, Readings, Discussion Prompts, & Point Distribution (1,000-Point Scale)

Week	Module Topic	Required Readings	Weekly Canvas Discussion Prompt (Wed/Sun Deadlines)	Major Milestone Deliverable & Point Weight
Week 1	Foundations of Strategic Planning, Public Value, & Mandates	Bryson & George (2024) Ch. 1–4, Resource A; Linfield & Posavac (2018) Ch. 1	Analyze how formal statutory mandates and informal political expectations constrain or enable a human services agency's public mission.	Discussion Board (30 pts); Agency Selection & Mandate Worksheet (20 pts)
Week 2	Environmental Scanning: PESTLE, SWOT, & Needs Assessment	Bryson & George (2024) Ch. 5–6, Resource B; Linfield & Posavac (2018) Ch. 6; Wholey et al. (2010) Ch. 2	Present three empirical regional data points (Medicaid rates, workforce deficits, or demographic shifts) and evaluate their impact on your selected agency's strategic issues.	Discussion Board (30 pts); Milestone 1: Environmental PESTLE & SWOT Matrix Audit (1,500-word critical audit + dashboard) (150 pts)
Week 3	Organizational Hierarchies, Strategy Formulation, & Logic Models	Bryson & George (2024) Ch. 7–8; Linfield & Posavac (2018) Ch. 2–3; Wholey et al. (2010) Ch. 3	Compare centralized bureaucratic hierarchies with matrixed multidisciplinary structures when launching a rapid community crisis intervention.	Discussion Board (30 pts); Program Theory & Logic Model Draft (20 pts)
Week 4	Authority Flows, Bottleneck Diagnostics, & Leadership Roles	Bryson & George (2024) Ch. 11–12; CDC (1999) Steps 1–3	Trace a policy directive from an executive board to frontline caseworkers and identify the primary structural communication bottleneck and its remedy.	Discussion Board (30 pts); Milestone 2: Leadership Hierarchy & Authority Flow Analysis (Chart A + Chart B + Structural Analysis) (150 pts)
Week 5	Ethical Decision Matrices & Resource Rationing Under Crisis	Linfield & Posavac (2018) Ch. 5; CDC (1999) Propriety Standards (Box 15); Wholey et al. (2010) Ch. 27	Contrast utilitarian outcome maximization with deontological duty when an agency faces an abrupt 30% federal grant rescission.	Discussion Board (30 pts); Milestone 3: Multi-Lens Ethical Resolution Brief (Utilitarian vs. Deontological Crisis Rationing Brief) (150 pts)

Week	Module Topic	Required Readings	Weekly Canvas Discussion Prompt (Wed/Sun Deadlines)	Major Milestone Deliverable & Point Weight
Week 6	Program Implementation, Gantt Dependencies, & Staffing Plans	Bryson & George (2024) Ch. 9; Linfield & Posavac (2018) Ch. 7; Wholey et al. (2010) Ch. 5, 11	Evaluate direct versus staged implementation strategies for a mobile health or outpatient behavioral health initiative, specifying FTE staffing ratios.	Discussion Board (30 pts); Implementation Gantt & FTE Draft (20 pts)
Week 7	Fiscal Budgeting, Cost-Effectiveness, & Vulnerable Outreach	Linfield & Posavac (2018) Ch. 12; Wholey et al. (2010) Ch. 21	Differentiate between cost-effectiveness analysis and cost-benefit analysis in defending a human services program budget to county commissioners.	Discussion Board (30 pts); Milestone 4: Scaffolded Program Implementation & Project Plan (12-Month Rollout Manual & Fiscal Budget) (150 pts)
Week 8	Technical Program Evaluation Systems, Validity, & CQI Loops	Bryson & George (2024) Ch. 10; Linfield & Posavac (2018) Ch. 4, 8–11, 13–14; CDC (1999) Steps 4–6; Wholey et al. (2010) Ch. 16–20, 23–25	Design a continuous quality improvement (CQI) trigger protocol that automatically modifies clinical intake workflows when KPI thresholds fall below target benchmarks.	Discussion Board (30 pts); Milestone 5: The Technical Program Evaluation System (KPIs, Qualitative Touchpoints, Validity Plan, & CQI Loop) (150 pts)

3.4 HH 630 Institutional Grading Rubric Matrix (Mapped to Core Competencies 1–5)

Competency & Milestone Alignment	Exemplary (Grade A: 90–100% / 4.00)	Proficient (Grade B: 80–89.99% / 3.00 — Minimum Graduate Standard)	Developing (Grade C: 70–79.99% / 2.00 — Below SAP Threshold)	Unsatisfactory (Grade F: 0–69.99% / 0.00)
Competency 1: Strategic Assessment (Weeks 1–2 PESTLE & SWOT Audit)	Synthesizes empirical regional labor, Medicaid reimbursement, and socioeconomic data into a complete PESTLE & SWOT dashboard and 1,500-word mission alignment audit citing Bryson & George (2024).	Completes PESTLE & SWOT matrix and mission evaluation with relevant regional data and clear analysis, with minor gaps in empirical depth or capital expenditure alignment.	Provides descriptive SWOT/PESTLE summaries lacking empirical regional statistics or superficial evaluation of mission divergence.	Omits PESTLE or SWOT components, lacks empirical grounding, or fails to evaluate organizational mission alignment.
Competency 2: Organizational Hierarchy Review (Weeks 3–4 Authority Flow)	Constructs both Chart A (centralized bureaucratic) and Chart B (decentralized matrixed) and traces directive flow to frontline caseworkers with precise bottleneck indicators and optimized reporting paths.	Submits both visual organizational charts and identifies communication bottlenecks and reporting remedies, with minor omissions in authority delay tracing.	Submits incomplete visual diagrams or discusses management structures generically without tracing frontline directive bottlenecks.	Fails to provide comparative visual charts or omits structural bottleneck analysis.

Competency & Milestone Alignment	Exemplary (Grade A: 90–100% / 4.00)	Proficient (Grade B: 80–89.99% / 3.00 — Minimum Graduate Standard)	Developing (Grade C: 70–79.99% / 2.00 — Below SAP Threshold)	Unsatisfactory (Grade F: 0–69.99% / 0.00)
Competency 3: Ethical Decision Matrices (Week 5 Crisis Brief)	Rigorously executes both Utilitarian and Deontological analyses on the 30% grant reduction scenario, defends a concrete rationing policy, and details risk mitigation for displaced populations.	Contrasts Utilitarian and Deontological frameworks and justifies a policy choice for the 30% budget cut, with minor gaps in displaced client risk mitigation.	Defines ethical theories abstractly without applying them to the 30% grant reduction or fails to defend a specific operational rationing policy.	Omits comparative ethical analysis or fails to address the resource rationing crisis scenario.
Competency 4: Program Implementation Project (Weeks 6–7 Rollout Manual)	Delivers a comprehensive 12-month Gantt timeline with task dependencies, credentialed FTE staffing calculations, vulnerable population outreach strategy, and startup/operational fiscal budget.	Provides a 12-month timeline, staffing plan, marketing strategy, and fiscal budget with logical structure, lacking minor granularity in FTE or grant renewal metrics.	Submits a high-level narrative plan missing logical task dependencies, explicit FTE calculations, or itemized startup/variable budget figures.	Fails to submit a structured rollout manual or omits core timeline, staffing, or budget sections.
Competency 5: Data Evaluation System (Week 8 Capstone Evaluation Matrix)	Designs a complete auditing system specifying quantitative KPIs, qualitative focus group/interview protocols, internal/external validity protections, and an automated CQI feedback loop citing Linfield & Posavac (2018) and CDC (1999).	Establishes quantitative KPIs, qualitative touchpoints, validity safeguards, and a CQI feedback loop, with minor imprecision in measurement bias controls.	Lists general outcome goals without operationalized KPIs, structured qualitative protocols, or a functional CQI feedback mechanism.	Fails to construct an objective evaluation matrix or omits quantitative/qualitative metrics and validity protections.

PART IV: COMPREHENSIVE SYLLABUS EXPANSION — HH 620: LEADERSHIP AND MULTIDISCIPLINARY TEAMS

4.1 Official Verbatim Website & Catalog Course Description Comparison

- Herzing University Official Catalog & Website Description (3.00 Credits): "This course focuses on developing advanced leadership skills and effective teamwork strategies in the health and human services field. Students will analyze communication and leadership styles, understanding their impact on team dynamics. The course emphasizes the application of best practices for managing internal and external multidisciplinary teams, utilizing problem-solving and decision-making skills to address the needs of individuals, teams, and communities. Students will evaluate innovative practices for leading and monitoring change, learning how to provide resources, support, and motivate teams while preventing burnout." (**HH 620 Official Catalog Preview**, **Herzing MS-HHSL Program**).
- Credit Hour & Time Commitment Specification: Per the **Herzing University Graduate Catalog Credit Hour Policy**, as a 3.00-credit online graduate course delivered over an 8-week modular session, HH 620 requires 135 total hours of academic engagement (approximately 16.875 hours per week across textbook readings, leadership instrument self-assessments, discussion forums, and applied case blueprints).

4.2 Deep-Dive Textbook & Secondary Literature Breakdown (HH 620)

A. Primary Text 1: Northouse (2021) — Leadership: Theory and Practice (9th Edition)

- Bibliographic & Publisher Registry: Peter G. Northouse, PhD (Professor Emeritus of Communication, School of Communication, Western Michigan University). Published February 2021 by **SAGE Publications** (Copyright 2022 printing; LCCN 2020045038), 528 pages. Paperback ISBN-13: 978-1544397566; Loose-leaf ISBN: 978-1071836149; EPUB ISBN: 978-1071834466 / 978-1071834473; PDF ISBN: 978-1071834480 (**Northouse 9th Ed. Full Text & TOC**).
- Complete Chapter-by-Chapter Table of Contents, Case Studies, & Diagnostic Instruments (**Northouse 9th Ed. Detailed Contents**):

Chapter & Page Range	Core Theoretical Components & Models	Chapter Case Studies (3 Per Chapter)	Embedded Diagnostic Instrument / Questionnaire
Ch. 1: Introduction (pp. 1–26)	Leadership Defined (influence, groups, common goals); Trait vs. Process Leadership; Assigned vs. Emergent Leadership; Power (referent, expert, legitimate, reward, coercive, information); Coercion; Morality ("The Hitler Question": neutral vs. moral process); Leadership vs. Management (Kotter, Rost).	Case 1.1: Open Mouth…	Conceptualizing Leadership Questionnaire (pp. 22–24)
Ch. 2: Trait Approach (pp. 27–55)	Intelligence, Self-Confidence, Determination, Integrity, Sociability; Five-Factor Personality Model (Big Five: neuroticism, extraversion, openness, agreeableness, conscientiousness); Strengths and Leadership (Gallup vs. Values in Action); Emotional Intelligence (Goleman, Mayer & Salovey).	Case 2.1: Choosing a New Director of Research; Case 2.2: Recruiting for the Bank; Case 2.3: Elon Musk	Leadership Trait Questionnaire (LTQ) (pp. 51–53)
Ch. 3: Skills Approach (pp. 56–83)	Katz's Three-Skill Approach (Technical, Human, Conceptual skills across management tiers); Mumford et al.'s Capability Skills Model: Individual Attributes (general/crystallized cognitive ability, motivation, personality), Competencies (9 Problem-Solving Skills, Social Judgment Skills [perspective taking, social perceptiveness, behavioral flexibility, social performance], Knowledge), Career Experiences, Environmental Influences, and Leadership Outcomes.	Case 3.1: A Strained Research Team; Case 3.2: Andy's Recipe; Case 3.3: 2019 Global Teacher of the Year: Peter Tabichi	Skills Inventory (pp. 79–81)

Chapter & Page Range	Core Theoretical Components & Models	Chapter Case Studies (3 Per Chapter)	Embedded Diagnostic Instrument / Questionnaire
Ch. 4: Behavioral Approach (pp. 84–108)	Task and Relationship Behaviors; Ohio State Studies (Initiating Structure vs. Consideration); University of Michigan Studies (Employee vs. Production Orientation); Blake & Mouton's Managerial (Leadership) Grid (Authority-Compliance 9,1; Country Club 1,9; Impoverished 1,1; Middle-of-the-Road 5,5; Team Management 9,9; Paternalism/ Maternalism; Opportunism).	Case 4.1: A Drill Sergeant at First; Case 4.2: We Are Family; Case 4.3: Cheer Coach Monica Aldama	Leadership Behavior Questionnaire (pp. 104–106)
Ch. 5: Situational Approach (pp. 109–131)	Hersey & Blanchard's Situational Leadership II (SLII) Model: Leadership Styles (S1 Directing, S2 Coaching, S3 Supporting, S4 Delegating) matched to Follower Development Levels (D1 Low Competence/High Commitment to D4 High Competence/High Commitment).	Case 5.1: Marathon Runners at Different Levels; Case 5.2: Getting the Message Across; Case 5.3: Philosophies of Chinese Leadership	SLII Questionnaire: Sample Items (pp. 127–130)
Ch. 6: Path–Goal Theory (pp. 132–156)	House's Path-Goal Theory: Leader Behaviors (Directive, Supportive, Participative, Achievement-Oriented), Follower Characteristics (need for affiliation, preferences for structure, desire for control, self-perceived task ability), and Task Characteristics (design, formal authority system, primary work group).	Case 6.1: Three Shifts, Three Supervisors; Case 6.2: Playing in the Orchestra; Case 6.3: Row the Boat	Path–Goal Leadership Questionnaire (pp. 153–155)
Ch. 7: Leader–Member Exchange Theory (pp. 157–184)	Vertical Dyad Linkage (In-Group vs. Out-Group); LMX Quality and Organizational Citizenship Behavior; Leadership Making (Phase 1 Stranger, Phase 2 Acquaintance, Phase 3 Mature Partnership); Emotions and LMX Development.	Case 7.1: His Team Gets the Best Assignments; Case 7.2: Working Hard at Being Fair; Case 7.3: Pixar: Creating Space for Success	LMX-7 Questionnaire (pp. 180–182)
Ch. 8: Transformational Leadership (pp. 185–220)	Burns's Transformational vs. Transactional Leadership; House's Charismatic Leadership; Bass's Full Range of Leadership Model: 4 Transformational Factors (Idealized Influence, Inspirational Motivation, Intellectual Stimulation, Individualized Consideration), 2 Transactional Factors (Contingent Reward, Management-by-Exception Active/Passive), 1 Nonleadership Factor (Laissez-Faire); Bennis & Nanus; Kouzes & Posner's 5 Practices.	Case 8.1: The Vision Failed; Case 8.2: An Exploration in Leadership; Case 8.3: Grandmothers and Benches (Friendship Bench mental health program)	Transformational Leadership Inventory (pp. 218–219)

Chapter & Page Range	Core Theoretical Components & Models	Chapter Case Studies (3 Per Chapter)	Embedded Diagnostic Instrument / Questionnaire
Ch. 9: Authentic Leadership (pp. 221–252)	Intrapersonal, Interpersonal, and Developmental definitions; Bill George's Practical Approach (Purpose/Passion, Values/ Behavior, Relationships/ Connectedness, Self-Discipline/ Consistency, Heart/Compassion); Walumbwa et al.'s Theoretical Approach (Self-Awareness, Internalized Moral Perspective, Balanced Processing, Relational Transparency; Psychological Capacities & Critical Life Events).	Case 9.1: Am I Really a Leader?; Case 9.2: Kassy's Story; Case 9.3: The Arena of Authenticity	Authentic Leadership Self-Assessment Questionnaire (pp. 248–250)
Ch. 10: Servant Leadership (pp. 253–284)	Greenleaf's Servant Leadership; Spears's 10 Characteristics (Listening, Empathy, Healing, Awareness, Persuasion, Conceptualization, Foresight, Stewardship, Commitment to the Growth of People, Building Community); Liden et al.'s Model: Antecedent Conditions, 7 Servant Leader Behaviors (Conceptualizing, Emotional Healing, Putting Followers First, Helping Followers Grow and Succeed, Behaving Ethically, Empowering, Creating Value for the Community), and Outcomes.	Case 10.1: Global Health Care; Case 10.2: Servant Leadership Takes Flight; Case 10.3: Energy to Inspire the World	Servant Leadership Questionnaire (pp. 279–282)
Ch. 11: Adaptive Leadership (pp. 285–321)	Heifetz's Adaptive Leadership Model: Situational Challenges (Technical, Technical & Adaptive, Adaptive Challenges); 6 Leader Behaviors (1. Get on the Balcony, 2. Identify Adaptive Challenges, 3. Regulate Distress, 4. Maintain Disciplined Attention, 5. Give the Work Back to the People, 6. Protect Leadership Voices From Below); Adaptive Work & Holding Environment.	Case 11.1: Silence, Stigma, and Mental Illness; Case 11.2: Taming Bacchus; Case 11.3: Agonizing Options for Marlboro College	Adaptive Leadership Questionnaire (pp. 315–319)
Ch. 12: Inclusive Leadership (pp. 322–351) (by Donna Chrobot-Mason & Quinetta Roberson)	Inclusion Defined (optimal distinctiveness: Belongingness/ Connectedness + Uniqueness); Model of Inclusive Leadership: Antecedent Conditions (Leader Characteristics, Group Diversity Cognitions, Organizational Policies/Practices), Inclusive Leadership Behaviors (fostering uniqueness, strengthening belongingness, showing appreciation, supporting organizational efforts, pushing for change), and Outcomes; Assessment, Challenge, and Support (ACS).	Case 12.1: Difficult Decision; Case 12.2: The Extraversion Advantage; Case 12.3: Inclusive Leadership During a Crisis	Inclusive Leadership Reflection Instrument (pp. 345–349)

Chapter & Page Range	Core Theoretical Components & Models	Chapter Case Studies (3 Per Chapter)	Embedded Diagnostic Instrument / Questionnaire
Ch. 13: Followership (pp. 352–393)	Role-Based vs. Relational-Based Followership; Typologies (Zaleznik, Kelley [Alienated, Exemplary, Conformist, Passive, Pragmatist], Chaleff [Resource, Individualist, Implementer, Partner], Kellerman [Isolates, Bystanders, Participants, Activists, Diehards]); Reversing the Lens & Co-Created Process; Lipman-Blumen's 6 Psychological Factors in Destructive Leadership.	Case 13.1: Bluebird Care; Case 13.2: Olympic Rowers; Case 13.3: Penn State Sexual Abuse Scandal	Followership Questionnaire (pp. 387–391)
Ch. 14: Gender and Leadership (pp. 394–421) (by Stefanie Simon & Crystal L. Hoyt)	The Glass Ceiling Turned Leadership Labyrinth; Human Capital, Gender Differences, and Prejudice/Stereotypes (Role Congruity Theory, Think Manager–Think Male, Stereotype Threat, Glass Cliff); Navigating the Labyrinth (Organizational Reform & Individual Level).	Case 14.1: The "Glass Ceiling"; Case 14.2: Pregnancy as a Barrier to Job Status; Case 14.3: Jacinda Ardern, Prime Minister of New Zealand	Gender-Leader Bias Questionnaire (pp. 418–420)
Ch. 15: Leadership Ethics (pp. 422–460)	Kohlberg's 6 Stages of Moral Development (Preconventional, Conventional, Postconventional); Ethical Theories: Teleological (Ethical Egoism, Utilitarianism, Altruism), Deontological, and Virtue-Based Theories; Heifetz, Burns, & the Dark Side of Leadership (Toxic Triangle); 5 Principles of Ethical Leadership (Respect Others, Serve Others, Are Just, Are Honest, Build Community).	Case 15.1: Choosing a Research Assistant; Case 15.2: Reexamining a Proposal; Case 15.3: Ship Shape (USS Theodore Roosevelt COVID-19 crisis)	Ethical Leadership Style Questionnaire (Short Form) (pp. 452–458)
Ch. 16: Team Leadership (pp. 461–496) (by Susan E. Kogler Hill)	Hill's Team Leadership Model: 8 Characteristics of Team Excellence (Larson & LaFasto: Clear Elevating Goal, Results-Driven Structure, Competent Team Members, Unified Commitment, Collaborative Climate, Standards of Excellence, External Support/Recognition, Principled Leadership); 3 Leadership Decisions (Monitor vs. Take Action; Task vs. Relational; Internal vs. External); Internal Task Actions, Internal Relational Actions, and External Environmental Actions.	Case 16.1: Team Crisis Within the Gates; Case 16.2: Starts With a Bang, Ends With a Whimper; Case 16.3: 1980 U.S. Olympic Hockey Team	Team Excellence and Collaborative Team Leader Questionnaire (pp. 491–494)

B. Primary Text 2: Lynch (2015) — Leadership in Human Services: How to Lead and Manage Effective Networks (1st Edition)

- Bibliographic & Author Registry: Dr. Rufus Sylvester Lynch, DSW, ACSW, NASW Social Work Pioneer (B.A. in Sociology, Morgan State College; M.S.W., University of Pittsburgh; Advanced Certificate in Social Administration & D.S.W., University of Pennsylvania). Former Professor and Dean of the Whitney M. Young, Jr. School of Social Work at Clark Atlanta University; 2012–2016 Stoneleigh Fellow and Research Associate at Bryn Mawr College's Graduate School of Social Work and Social Research; Founder & Chair of The Strong Families Commission, Inc., and Director of the Pennsylvania Fathers, Families & Service Providers

Network (**FRPN Biography**, **Stoneleigh Foundation Profile**). Published 2015 by Oxford University Press (ISBN-13: 978-0190214340 / ISBN-10: 0190214341).

- Core Curricular Frameworks in Lynch (2015):
  - Inter-Organizational & Multidisciplinary Network Governance: Moving beyond single-agency hierarchical silos to lead cross-system human services networks (child welfare, behavioral health, juvenile justice, public health, housing, and family support systems).
  - Boundary-Spanning & Collaborative Power Sharing: Managing authority friction when leading external partners over whom the network leader lacks formal hierarchical line authority; building trust, shared accountability, and formal memoranda of understanding (MOUs).
  - Intentional Transformation of Systems of Care: Eliminating institutional barriers to vulnerable and marginalized populations (including father-inclusive family systems and culturally responsive community networks) through coordinated intake, shared data governance, and multidisciplinary case conferencing (**Stoneleigh Foundation**).

C. Secondary Reading 1: Kotter (2012) — Leading Change

- Bibliographic Registry: John P. Kotter (Konosuke Matsushita Professor of Leadership, Emeritus, Harvard Business School). Leading Change, with a New Preface by the Author (2012, **Harvard Business Review Press**; original 1996 edition **Library of Congress TOC**; **Kotter 8-Step Methodology**).
- Complete 12-Chapter Table of Contents & 8-Stage Change Process (**LOC TOC**, **Kotter International**):
  - Part I: The Change Problem and Its Solution (pp. 1–32)
    - Chapter 1: Transforming Organizations: Why Firms Fail (The 8 Common Errors: allowing too much complacency; failing to create a sufficiently powerful guiding coalition; underestimating the power of vision; undercommunicating the vision by a factor of 10; permitting obstacles to block the new vision; failing to create short-term wins; declaring victory too soon; neglecting to anchor changes firmly in the corporate culture).
    - Chapter 2: Successful Change and the Force That Drives It (Management vs. Leadership in transformation).
  - Part II: The Eight-Stage Process (pp. 33–158)
    - Chapter 3 (Step 1): Establishing a Sense of Urgency (Examining market and competitive realities; identifying crises and major opportunities).
    - Chapter 4 (Step 2): Creating the Guiding Coalition (Assembling a group with enough power, position, expertise, credibility, and leadership to lead the change).
    - Chapter 5 (Step 3): Developing a Vision and Strategy (Creating a vision to help direct the change effort and strategies for achieving that vision).
    - Chapter 6 (Step 4): Communicating the Change Vision (Using every vehicle possible to constantly communicate the new vision and strategies; having the guiding coalition role-model expected behaviors — "Enlist a Volunteer Army").
    - Chapter 7 (Step 5): Empowering Employees for Broad-Based Action (Getting rid of structural, skills, system, and supervisor obstacles; changing systems or structures that undermine thechange vision — "Enable Action by Removing Barriers").
    - Chapter 8 (Step 6): Generating Short-Term Wins (Planning for visible performance improvements, creating those wins, and visibly recognizing and rewarding employees involved).
    - Chapter 9 (Step 7): Consolidating Gains and Producing More Change (Using increased credibility to change systems, structures, and policies that don't fit the transformation vision; hiring, promoting, and developing employees who can implement the vision — "Sustain Acceleration").
    - Chapter 10 (Step 8): Anchoring New Approaches in the Culture (Articulating the connections between new behaviors and organizational success; developing means to ensure leadership development and succession — "Institute Change").
  - Part III: Implications for the Twenty-First Century (pp. 159–186)
    - Chapter 11: The Organization of the Future
    - Chapter 12: Leadership and Lifelong Learning

D. Secondary Reading 2: Maslach & Leiter (2016) — Understanding the Burnout Experience

- Bibliographic & Full-Text Registry: Christina Maslach (University of California, Berkeley) and Michael P. Leiter (Acadia University) (2016). Understanding the burnout experience: Recent research and its implications for psychiatry. World Psychiatry, 15(2), 103–111. DOI: 10.1002/wps.20311 (**PMC4911781 Full Text**, **PubMed PMID 27265691**).
- Granular Theoretical & Empirical Synthesis from **Maslach & Leiter (2016)**:
  - Three-Dimensional Definition of Burnout: A psychological syndrome emerging as a prolonged response to chronic interpersonal stressors on the job, comprising:
    - (1) Exhaustion (wearing out, loss of energy, depletion, debilitation, fatigue — the individual stress dimension most predictive of physiological symptoms such as headaches, gastrointestinal disorders, hypertension, sleep disturbances, and a 1.0–1.4x increased risk of cardiovascular/mental health hospitalization);
    - (2) Cynicism / Depersonalization (negative or inappropriate attitudes toward clients, detached concern, dehumanization in self-defense, irritability, loss of idealism, and withdrawal — the interpersonal dimension and the pivotal predictor of job turnover); and
    - (3) Inefficacy / Reduced Personal Accomplishment (reduced productivity or capability, low morale, inability to cope — the self-evaluation dimension closely tied to strained relationships with supervisors and colleagues).
  - Psychometric Assessment Instruments Compared:
    - Maslach Burnout Inventory (MBI) — MBI-Human Services Survey (MBI-HSS) and MBI-General Survey (MBI-GS) (3 dimensions);
    - Bergen Burnout Inventory (BBI) (exhaustion, cynicism toward meaning of work, sense of inadequacy);
    - Oldenburg Burnout Inventory (OLBI) (exhaustion and disengagement);
    - Shirom-Melamed Burnout Measure (SMBM) (physical fatigue, emotional exhaustion, cognitive weariness);
    - Copenhagen Burnout Inventory (CBI) (physical and psychological exhaustion);
    - Utrecht Work Engagement Scale (UWES) (measuring work engagement via vigor, dedication, and absorption).
  - Developmental & Imbalance Models of Burnout:
    - Sequential Stage & Transactional Model: Job stressors (demand-resource imbalance) → Individual strain (exhaustion/anxiety) → Defensive coping (cynicism).
    - Job Demands-Resources (JD-R) Model: Incessant job demands paired with inadequate organizational resources.
    - Conservation of Resources (COR) Model: Burnout triggered by persistent threats to or actual loss of valued resources.
    - Six Areas of Worklife (AW) Model: Person-job mismatches across six organizational domains: (1) Workload (chronic overload preventing recovery), (2) Control (lack of professional autonomy and decision-making influence), (3) Reward (insufficient financial, institutional, or social recognition), (4) Community (unresolved conflict, lack of peer support/trust, workplace incivility, and social contagion of burnout across workgroups), (5) Fairness (perceived procedural inequity and lack of respect), and (6) Values (cognitive-emotional gap between personal service ideals and organizational mandates).
  - Behavioral Health & Human Services Specific Stressors: Compassion fatigue, secondary traumatic stress, vicarious traumatization, negative transference (patient anger/violence), unrealistic family expectations, attachment anxiety/avoidance in peer dynamics, and discriminant validity distinguishing job-specific burnout from context-free clinical depression (critiquing PHQ-9 vs. SMBM fatigue item overlap).

4.3 Expanded Granular Assignment Prompts for HH 620 ("Prompt Detail" & "Twice the Detail")

- Weeks 1–2 Milestone: Leadership Self-Assessment & Behavioral Profile
  - Prompt Detail: Complete the diagnostic questionnaires in Chapters 1–6 of Northouse (2021) (Conceptualizing Leadership, LTQ, Skills Inventory, Leadership Behavior Questionnaire, SLII, and Path-Goal Questionnaire). Draft a detailed comparative behavioral profile analyzing your dominant leadership traits, task-versus-relationship

balance, and situational adaptability, concluding with a workplace friction analysis of how your profile interacts with diverse multidisciplinary human services teams.
    - Twice the Detail: This milestone requires executing and scoring at least four validated psychometric self-assessments from Northouse (2021) (specifically the Leadership Trait Questionnaire [Ch. 2], Skills Inventory [Ch. 3], Blake & Mouton Leadership Behavior Questionnaire [Ch. 4], and Path-Goal Questionnaire [Ch. 6]). You must construct a quantitative score summary table and author a 1,500-word comparative behavioral profile. Your analysis must evaluate your technical, human, and conceptual skill ratios (Katz/Mumford model), diagnose where your task-versus-relationship orientation creates interpersonal friction with clinical social workers, medical providers, and case managers, and prescribe concrete behavioral flexibility adjustments using Situational Leadership (SLII) and Leader-Member Exchange (LMX) theory to eliminate out-group alienation.
- Weeks 3–4 Milestone: Inter-Departmental Conflict Case Study
    - Prompt Detail: Analyze a complex inter-departmental or inter-agency conflict scenario within a multidisciplinary health and human services network (e.g., friction between clinical behavioral health staff, child welfare caseworkers, and fiscal compliance officers). Construct a stakeholder power/interest matrix and author a formal mediation and collaborative governance protocol.
    - Twice the Detail: Drawing on Northouse (2021) Chapters 7, 10, 12, and 16 (LMX, Servant Leadership, Inclusive Leadership, and Hill's Team Leadership Model) alongside Lynch (2015) on inter-organizational network management, you will diagnose an acute inter-departmental breakdown threatening client care continuity. You must submit: (1) a visual Stakeholder Power/Interest and Influence Matrix mapping internal departments and external network agencies; (2) a diagnostic audit using Larson and LaFasto's 8 Characteristics of Team Excellence to pinpoint structural versus relational failure points; and (3) a step-by-step Inter-Departmental Mediation Protocol utilizing Hill's internal relational actions, Chrobot-Mason and Roberson's inclusive leadership behaviors (belongingness + uniqueness), and formal boundary-spanning network agreements.
- Weeks 5–6 Milestone: Institutional Change Management Blueprint
    - Prompt Detail: Design an institutional change management blueprint for a major organizational transformation in a human services agency (such as transitioning to an integrated electronic health/case management system or merging two community clinics). Include an organizational readiness assessment and a phased rollout plan grounded in Kotter's (2012) 8-Step Model and Heifetz's Adaptive Leadership framework.
    - Twice the Detail: Acting as an executive change leader, you will author a comprehensive Institutional Change Management Blueprint addressing both technical and adaptive challenges (Northouse Ch. 8 Transformational Leadership and Ch. 11 Adaptive Leadership; Kotter, 2012). Your blueprint must include: (1) an Organizational Readiness & Resistance Diagnostic identifying which of Kotter's 8 common transformation errors currently threaten the agency; (2) a differentiation between technical workflows and adaptive cultural resistance, specifying how leadership will "get on the balcony," regulate distress, and maintain a safe holding environment; and (3) a Phased 8-Stage Rollout Matrix mapping concrete actions, guiding coalition roles, communication channels, barrier removal tactics, short-term win benchmarks, and cultural anchoring mechanisms across a 6-to-12-month horizon.
- Weeks 7–8 Milestone: Workforce Attrition & Burnout Prevention Plan
    - Prompt Detail: Develop an evidence-based workforce retention and burnout prevention plan for a high-turnover human services or behavioral health agency. Your plan must establish quantitative caseload calculation formulas, worklife mismatch remedies across Maslach and Leiter's (2016) six domains, and structured peer support and trauma-informed supervision protocols.
    - Twice the Detail: Grounded in Maslach and Leiter (2016), Northouse (2021) Chapter 15 (Leadership Ethics), and Lynch (2015), this capstone milestone addresses chronic workforce attrition, secondary traumatic stress, and compassion fatigue in a frontline human services workforce. Your plan must deliver: (1) an Areas of Worklife (AW) Diagnostic Matrix auditing organizational mismatches across Workload, Control, Reward, Community, Fairness, and Values; (2) an explicit Quantitative Caseload & Acuity Weighting Formula that caps frontline caseworker ratios based on client trauma acuity and administrative documentation load; (3) a Trauma-Informed Peer Support & Reflective Supervision Protocol designed to interrupt burnout contagion and attachment incivility across workgroups; and (4) a longitudinal retention

evaluation schedule using the Maslach Burnout Inventory–Human Services Survey (MBI-HSS) and Utrecht Work Engagement Scale (UWES).

4.4 HH 620 Weekly Modular Schedule, Readings, Discussion Prompts, & Point Distribution (1,000-Point Scale)

Week	Module Topic	Required Readings	Weekly Canvas Discussion Prompt (Wed/Sun Deadlines)	Major Milestone Deliverable & Point Weight
Week 1	Foundations of Leadership: Trait, Skills, & Behavioral Approaches	Northouse (2021) Ch. 1–4; Lynch (2015) Intro & Part I	Contrast Katz's three-skill approach with Mumford's capability model and evaluate how task vs. relationship behaviors impact frontline human services supervision.	Discussion Board (30 pts); Diagnostic Instrument Score Log (Ch. 1–4) (30 pts)
Week 2	Situational, Path-Goal, & Leader-Member Exchange (LMX) Theories	Northouse (2021) Ch. 5–7	Analyze how in-group/out-group vertical dyads form in clinical/human services settings and how high-quality LMX leadership making prevents team fragmentation.	Discussion Board (30 pts); Milestone 1: Leadership Self-Assessment & Behavioral Profile (1,500-word profile + friction analysis) (175 pts)
Week 3	Multidisciplinary Team Leadership & Inter-Agency Networks	Northouse (2021) Ch. 16 (Hill Team Leadership); Lynch (2015) Network Governance Chapters	Apply Hill's Team Leadership Model to a multidisciplinary case conference where medical, social work, and legal staff hold conflicting priorities.	Discussion Board (30 pts); Team Excellence Diagnostic Worksheet (30 pts)
Week 4	Inclusive Leadership, Followership, Gender Labyrinth, & Conflict	Northouse (2021) Ch. 12–14	Evaluate how Chrobot-Mason & Roberson's model of optimal distinctiveness (belongingness + uniqueness) and Chaleff's courageous followership resolve inter-departmental conflict.	Discussion Board (30 pts); Milestone 2: Inter-Departmental Conflict Case Study (Power/Interest Matrix + Mediation Protocol) (175 pts)
Week 5	Transformational, Authentic, & Servant Leadership in Human Services	Northouse (2021) Ch. 8–10; Kotter (2012) Part I (Ch. 1–2)	Compare Bass's transformational factors (4 I's) with Liden's servant leadership behaviors when building a guiding coalition for agency reform.	Discussion Board (30 pts); Change Readiness Diagnostic Draft (30 pts)
Week 6	Leading Institutional Change: Kotter's 8 Steps & Adaptive Leadership	Northouse (2021) Ch. 11 (Adaptive Leadership); Kotter (2012) Part II–III (Ch. 3–12)	Differentiate between technical challenges and adaptive challenges in human services restructuring and explain how leaders regulate organizational distress.	Discussion Board (30 pts); Milestone 3: Institutional Change Management Blueprint (Readiness Assessment + 8-Step Phased Plan) (175 pts)

Week	Module Topic	Required Readings	Weekly Canvas Discussion Prompt (Wed/Sun Deadlines)	Major Milestone Deliverable & Point Weight
Week 7	Occupational Burnout, Areas of Worklife, & Secondary Trauma	Maslach & Leiter (2016) pp. 103–111; Lynch (2015) Workforce Sustainability	Analyze how mismatches across Maslach & Leiter's six Areas of Worklife (workload, control, reward, community, fairness, values) drive cynicism and turnover in behavioral health.	Discussion Board (30 pts); Caseload Acuity & MBI-HSS Audit Worksheet (30 pts)
Week 8	Ethical Leadership, Workforce Retention, & Peer Support Systems	Northouse (2021) Ch. 15 (Leadership Ethics); Maslach & Leiter (2016) Interventions	Synthesize Northouse's five principles of ethical leadership with organizational burnout interventions to design a sustainable, trauma-informed workplace culture.	Discussion Board (30 pts); Milestone 4: Workforce Attrition & Burnout Prevention Plan (Caseload Formulas + Peer Support Protocol) (175 pts)

4.5 HH 620 Institutional Grading Rubric Matrix (Mapped to Core Competencies 1–4)

Competency & Milestone Alignment	Exemplary (Grade A: 90–100% / 4.00)	Proficient (Grade B: 80–89.99% / 3.00 — Minimum Graduate Standard)	Developing (Grade C: 70–79.99% / 2.00 — Below SAP Threshold)	Unsatisfactory (Grade F: 0–69.99% / 0.00)
Competency 1: Style Diagnostics (Weeks 1–2 Behavioral Profile)	Completes and tabulates Northouse (2021) psychometric instruments (Ch. 1–6), synthesizes trait/skill/behavioral/situational theory, and delivers a rigorous workplace friction and LMX remediation analysis.	Completes self-assessments and analyzes leadership style and team friction accurately, with minor gaps in theoretical integration across Path-Goal or SLII models.	Summarizes personal leadership preferences subjectively without empirical questionnaire scoring or theoretical grounding in Northouse (2021).	Omits self-assessment data or fails to submit a comparative behavioral profile and friction analysis.
Competency 2: Team Management Case Studies (Weeks 3–4 Conflict Mediation)	Constructs a detailed Stakeholder Power/Interest Matrix, applies Hill's Team Leadership Model (Ch. 16), Inclusive Leadership (Ch. 12), and Lynch's (2015) network principles, and provides an actionable mediation protocol.	Submits a stakeholder matrix and mediation protocol grounded in team leadership theory, with minor omissions in external network boundary-spanning dynamics.	Describes workplace conflict generally without a structured power/interest matrix or fails to apply Hill's and Lynch's multidisciplinary models.	Fails to provide a stakeholder matrix or omits the inter-departmental mediation protocol.

Competency & Milestone Alignment	Exemplary (Grade A: 90–100% / 4.00)	Proficient (Grade B: 80–89.99% / 3.00 — Minimum Graduate Standard)	Developing (Grade C: 70–79.99% / 2.00 — Below SAP Threshold)	Unsatisfactory (Grade F: 0–69.99% / 0.00)
Competency 3: Change-Monitoring Exercises (Weeks 5–6 Change Blueprint)	Integrates Kotter's (2012) 8-Step Process and Heifetz's Adaptive Leadership (Northouse Ch. 11) into a comprehensive readiness diagnostic and phased rollout blueprint with measurable short-term wins and cultural anchoring.	Addresses organizational readiness and maps all 8 stages of Kotter's change model, with minor gaps in distinguishing technical vs. adaptive challenges.	Outlines a generic project timeline without assessing organizational resistance or applying Kotter's 8-step and adaptive leadership frameworks.	Omits readiness assessment or fails to submit a structured phased change management blueprint.
Competency 4: Burnout Prevention Planning (Weeks 7–8 Attrition & Burnout Plan)	Designs an empirical retention plan integrating Maslach & Leiter's (2016) 6 Areas of Worklife, explicit acuity-weighted caseload formulas, trauma-informed peer support protocols, and MBI-HSS/UWES monitoring.	Addresses workload, peer support, and burnout prevention citing Maslach & Leiter (2016) and Northouse (2021), with minor imprecision in quantitative caseload formulas.	Proposes generic individual self-care tips without addressing organizational Areas of Worklife mismatches, caseload formulas, or peer supervision structures.	Fails to submit a workforce attrition and burnout prevention plan or omits scholarly grounding.

PART V: COMPREHENSIVE WEB CRAWL FINDINGS — STUDENT REPOSITORIES, STUDY GUIDES, & FLASHCARD INDEXES

A comprehensive web crawl across Studocu, Quizlet, CourseHero, Stuvia, Docsity, Scribd, Slideshare, and publisher companion sites reveals the following structural findings regarding student-posted materials for HH 630 and HH 620:

- Course-Code Indexing vs. Textbook-Level Indexing: Because Herzing University's Master of Science in Health and Human Services Leadership (MS-HHSL) is a specialized 31-credit, 100% online graduate program that evaluates students exclusively through applied written milestones, organizational charts, policy briefs, and project manuals natively inside Canvas (with zero multiple-choice proctored exams via ProctorU, Proctorio, HESI, or Elsevier Sherpath), student study repositories on Stuvia and Docsity index thousands of undergraduate/graduate nursing exams (NSG and NU prefixes) but almost never tag graduate files under the literal strings "HH 630" or "HH 620". Instead, graduate human services and public administration students upload study guides, chapter flashcards, test banks, and lecture notes directly under the four required textbooks and cross-listed graduate leadership/evaluation courses.
- Verified Student Study Guides, Flashcards, Test Banks, & Open Educational Resources Located in Web Crawl:

Resource Platform & Title	Target Course & Textbook Alignment	Verified Content & Student Study Utility
SAGE Edge Official Student Companion — Northouse Leadership: Theory and Practice (**Ch. 2 Review & Flashcards**)	HH 620 — Northouse (Leadership: Theory and Practice)	Official open-access student resource hub containing interactive chapter Flashcards, Review Questions, Discussion Questions and Exercises, video case links, and SAGE journal articles for every chapter.

Resource Platform & Title	Target Course & Textbook Alignment	Verified Content & Student Study Utility
Studylib — Complete Digital Text & Questionnaires: Leadership: Theory and Practice (9th Ed., 2021)	HH 620 — Northouse (9th Ed., ISBN 978-1544397566)	Student-uploaded complete 9th Edition text (Uploaded by Kevin K.), including all 16 chapters, the new Chapter 12 on Inclusive Leadership, all 48 case studies, and all 16 self-assessment questionnaires required for Weeks 1–2.
Studocu — Leadership: Theory and Practice Summary & Skill Development Notes	HH 620 — Northouse (Leadership: Theory and Practice)	Student-shared textbook repository on Studocu covering core leadership models, trait/skills/behavioral matrices, LMX, transformational, servant, adaptive, and team leadership frameworks.
Docsity — Peter G. Northouse Leadership: Theory and Practice Exam Questions & Study Guide	HH 620 — Northouse (Leadership: Theory and Practice)	Student-uploaded graduate health/ nursing leadership study questions and verified answers covering Northouse's chapter frameworks.
Scribd — Northouse Leadership: Theory and Practice 1,592-Question Study & Flashcard Bank (Ch. 1 Notes)	HH 620 — Northouse (Ch. 1–16)	Comprehensive 16-chapter question bank and chapter-by-chapter concept summaries covering trait, skills, style, situational, path-goal, LMX, transformational, authentic, servant, adaptive, ethics, and team leadership.
Penn State World Campus PADM 516 — Dynamics of Strategic Planning & Bryson's Strategy Change Cycle	HH 630 — Bryson & George (Strategic Planning for Public and Nonprofit Organizations)	Open graduate lecture notes mapping Bryson's 10-Step Strategy Change Cycle, stakeholder power/interest grids, mandate clarification, and SWOT/ PESTLE environmental scans.
MBA Knowledge Base — Bryson's 10-Step Strategy Change Cycle Guide (GoConqr Mind Map)	HH 630 — Bryson & George (Ch. 2–10)	Visual mind maps and step-by-step breakdowns of Bryson's 10-step model for public and nonprofit organizations used in Weeks 1–2 and Weeks 6–7 milestones.
Scribd — Linfield & Posavac Program Evaluation: Methods and Case Studies (9th Ed.) Full Text & Overview (Slideshare Deck)	HH 630 — Linfield & Posavac (9th Ed., ISBN 978-1138103634)	Complete 9th Edition textbook upload and slide deck covering need assessment, program theory/logic models, implementation monitoring, single-group/quasi-experimental designs, cost analysis, and CQI utilization.
Scribd — Program Evaluation: Methods and Case Studies Question & Flashcard Bank	HH 630 — Posavac & Linfield (Ch. 1–14)	Question and flashcard bank testing internal/external validity threats, needs assessment methodologies, qualitative evaluation protocols, and ethical standards in program evaluation.
Eval.fr Open-Access PDF — Wholey, Hatry, & Newcomer (2010) Handbook of Practical Program Evaluation (3rd Ed.)	HH 630 — Secondary Text 2 (Wholey et al., 2010)	Full 752-page open-access PDF of the required 3rd Edition Jossey-Bass handbook covering logic models, performance measurement, agency records, surveys, semi-structured interviews, focus groups, and cost-benefit analysis.
CDC MMWR Full HTML Report — Framework for Program Evaluation in Public Health (1999) (2024 Update)	HH 630 — Secondary Text 1 (CDC, 1999)	Full official text and 17 summary boxes detailing the 6 evaluation steps and 30 ANSI-approved utility, feasibility, propriety, and accuracy standards.

Resource Platform & Title	Target Course & Textbook Alignment	Verified Content & Student Study Utility
PMC Open-Access Full Text — Maslach & Leiter (2016) Understanding the Burnout Experience	HH 620 — Secondary Text 2 (Maslach & Leiter, 2016)	Full open-access article from World Psychiatry detailing the 3 dimensions of burnout, MBI/UWES scales, JD-R/COR/Areas of Worklife models, and psychiatric/human services risk factors.
Stuvia — Herzing University Student Study Guides & Course Notes Repository (Docsity Herzing Portal)	Herzing University Cross-Program Repository	Over 4,490 student-uploaded study guides, class notes, and summaries across Herzing University graduate and undergraduate courses.

PART VI: HERZING UNIVERSITY INSTITUTIONAL SYLLABUS POLICIES & ACADEMIC REGULATIONS

All graduate courses in the Master of Science in Health and Human Services Leadership program are governed by the official policies published in the Herzing University Graduate Catalog:

6.1 Graduate Grading Scale (Non-Nursing Graduate Programs)

Per the Herzing University Graduate Catalog Grading Policies, courses in the MS-HHSL program are evaluated on the standard Graduate Grading Scale:

Letter Grade	Percentage Range	Quality Points per Credit	Academic Standing & Progression Impact
A	90.00% – 100.00%	4.00	Superior graduate proficiency; exceeds 3.00 PGPA graduation threshold.
B	80.00% – 89.99%	3.00	Satisfactory graduate proficiency; meets the 3.00 minimum cumulative PGPA required for graduation and SAP.
C	70.00% – 79.99%	2.00	Passing course credit earned, but falls below the 3.00 cumulative PGPA benchmark required for Satisfactory Academic Progress.
F	0.00% – 69.99%	0.00	Failure; awards zero credit and requires course repetition if mandatory for graduation.
I	Incomplete	N/A	Temporary designator for extenuating circumstances; must be requested by the final day of the grading period and resolved within two class weeks of the next academic term or converts to an "F".
W	Withdrawal	N/A	Issued for withdrawals prior to the 75% point of the course (Monday of Week 7 in an 8-week course); counts as attempted credits in SAP pace calculations but is excluded from PGPA.
TR	Transfer Credit	N/A	Approved graduate transfer credit (up to 12.00 semester credits with a grade of "B-" or higher earned within 5 years at a regionally accredited institution); counts toward SAP pace but not PGPA.

6.2 Satisfactory Academic Progress (SAP) & Graduation Requirements

- Minimum Program Grade Point Average (PGPA): Graduate students must maintain a cumulative PGPA of 3.00 ("B" average) or higher and a minimum credit completion pace of 66.67% (credits earned divided by credits attempted), evaluated at the conclusion of each 16-week semester (Herzing Graduate Catalog).

- Maximum Timeframe: Students must complete their graduate program within 150% of the published credit length (maximum 46.5 attempted credits for the 31-credit MS-HHSL program) and within seven (7) calendar years of matriculation.
- Academic Enrollment Load Definitions:
    - Full-Time Graduate Status: 6.00 or more semester credit hours per 16-week semester
    - Three-Quarter-Time Graduate Status: 5.00 semester credit hours per semester
    - Half-Time Graduate Status: 3.00 to 4.00 semester credit hours per semester

6.3 Online Attendance, Substantive Participation, & Make-Up Coursework Policies

- What Constitutes Online Attendance: Simply logging into the Canvas LMS or reading course materials does not count as attendance. Per the **Herzing Online Attendance Policy**, a student must complete at least one of the following academically related activities within Canvas to be recorded as present:
    - (1) Post substantively to a course discussion board;
    - (2) Submit a written assignment or project milestone; or
    - (3) Submit a quiz or examination.
- 14-Day Non-Attendance Withdrawal Rule & Week 2 Deadlines: Attendance is monitored daily. Any student who fails to complete a measurable academic activity across all enrolled courses for 14 consecutive calendar days may be administratively withdrawn from the University. Continuing students must actively participate by 11:59 PM CT on Tuesday of Week 2, and new or re-enrolling students must actively participate during both Week 1 and Week 2 to remain enrolled.
- Make-Up Policy for Missed Coursework: Under documented extenuating circumstances (illness, bereavement, court appearance, family emergency, or military duty), students may request instructor approval prior to the due date (except in acute emergencies) to submit late coursework within seven (7) calendar days of the original deadline. All Week 8 coursework must be submitted by the final day of the grading period unless an approved Incomplete ("I") petition is on file (**Herzing Graduate Catalog**).

6.4 Institutional Graduate Learning Outcomes & The P.R.I.C.E. of Success Model

- Four Institutional Graduate Learning Outcomes (Theory-to-Practice Model) (**Herzing Graduate Catalog**):
    - 1. Engagement in Advanced Study of the Discipline: Integrating historical/philosophical foundations with current policies, primary source inquiry, and emerging trends.
    - 2. Demonstration of Scholarship of Professional Practice: Applying established quantitative/qualitative research methodologies, ethical information stewardship, and evidence-based quality improvement to complex workplace problems.
    - 3. Cultivation of Thought-Leadership: Proposing evidence-based revisions in organizational policy, systems, and multidisciplinary practice through practitioner-scholar dialogue.
    - 4. Commitment to Professional Service: Advancing professional standards, ethical frameworks (such as the NASW Code of Ethics and American Evaluation Association standards), and community service equity.
- Herzing University P.R.I.C.E. of Success Core Values (**Herzing P.R.I.C.E. Model**):
    - P — Professionalism: Demonstrating reliability, executive communication, and preparedness in all virtual classroom and multidisciplinary interactions.
    - R — Respect: Honoring diverse perspectives, cultural humility, and inter-professional roles across health and human services teams.
    - I — Integrity: Upholding strict academic honesty, APA 7th Edition citation attribution, data validity, and ethical compliance.
    - C — Caring: Centering vulnerable client populations, trauma-informed care, and colleague well-being/burnout prevention.
    - E — Engagement: Actively contributing to weekly scholarly discussions, collaborative peer reviews, and continuous organizational improvement.
- Service Quality Assurance Policy: Any Herzing graduate student who completes and passes a course with a grade of "B" (80%) or better while complying with attendance and financial policies may retake that course on an audit basis within 12 months at zero additional tuition charge to reinforce professional proficiency (**Herzing Graduate Catalog**).

ACCESSIBILITY NAVIGATION: [↑ Cover & Disclaimer] · [↑ Table of Contents] · [↑ Case & Ticket Sheet] · [↑ Updated CV & SNHU Audit] · [↑ Angie MP4 & Transcript] · [↑ Gemini Podcast & Transcript] · [↑ Sarah Millard & Emails Addendum] · [Vol I] · [Vol II] · [Vol III] · [Vol IV] · [Vol V] · [Vol VI] · [Vol VII] · [Vol VIII] · [Vol IX] · [Vol X] · [↓ Table of Cases (Chronological)] · [↓ Table of Statutes] · [↓ Legal & Clinical Glossary] · [↓ Reference Registry] · [↓ Complete Index]

CWRIGHT26 COMPLETE COMPENDIUM · VOLUME II

VOLUME II: Direct Entry Master of Science in Nursing (MSN-DE) Comprehensive Course Syllabi & Clinical Rubric Audit

HERZING UNIVERSITY — GRADUATE SYLLABUS: MASTER OF SCIENCE IN NURSING – DIRECT ENTRY (MSN-DE)

Program: **Master of Science in Nursing – Direct Entry (MSN-DE / DEMSN)** (**Official MSN-DE Program Outline PDF**)

Institution: **Herzing University** — Online Division (in association with the Madison, Wisconsin Main Campus, 5218 East Terrace Drive, Madison, WI 53718; On-Campus Intensives at Brookfield, WI [15895 W. Bluemound Road] or Nashville, TN [100 Centerview Dr, Suite 100]; Hybrid Labs at Kenosha, WI [5800 7th Ave]; Administrative Offices: 275 W. Wisconsin Ave., Ste. 210, Milwaukee, WI 53203; Toll-Free: 1-800-596-0724)

Institutional & Programmatic Accreditation: Institutionally accredited by the **Higher Learning Commission (HLC)** (800-621-7440); Programmatically accredited by the Commission on Collegiate Nursing Education (CCNE, www.ccneaccreditation.org) (Herzing MSN-DE Program).

Total Program Credits & Contact Hours: 60.00 Graduate Nursing Semester Credit Hours (77.00 Total Semester Credit Hours including 17.00 Undergraduate Prerequisite Science/Math Credits) | 1,620.00 to 1,635.00 Total Contact Hours (885.00 Lecture Hours / 150.00–165.00 Lab Hours / 585.00 Clinical Practicum Hours) (**Herzing MSN-DE Program**, **MSN-DE Course Sheet**).

SECTION 1: PROGRAM IDENTITY, ACCREDITATION METRICS, & COMPLETE 77-CREDIT CURRICULUM ARCHITECTURE

1.1 Official Catalog Identity & Program Parameters

- Program Code & Title: MSN-DE / DEMSN — Master of Science in Nursing, Direct Entry (for Non-Nurses)
- Academic Level: Graduate (Prelicensure RN Preparation + Comprehensive's Core & Synthesis Capstone, with 9.00 DNP Dual-Credit Bridge Courses: NU 725, NU 730, NU 780)
- Program Length: 20–24 Months (5 Semesters for 60.00 Nursing Credits when 17.00 Prerequisite Credits are transferred; 6 Semesters for all 77.00 Credits) (**Herzing MSN-DE Program**).
- Delivery Format & Clinical/Intensive Structure:
    - Didactic Coursework: 100% online asynchronous and synchronous instruction via the Herzing University Canvas Learning Management System (LMS), integrated with Elsevier Sherpath lessons, Elsevier Adaptive Quizzing (EAQ), HESI standardized proctored examinations, and Wolters Kluwer vSim for Nursing / Lippincott DocuCare electronic health record simulations.
    - Clinical Practicum Hours: 585.00 Total Clinical Hours completed across six clinical/synthesis courses (NSG 522 [45 hrs], NSG 525 [135 hrs], NSG 528 [135 hrs], NSG 621 [135 hrs], NSG 631 [45 hrs], and NSG 632 [90 hrs]) via faculty-

led clinical rotations and/or precepted models within a 100-mile target radius, coordinated through the **ACEMAPP Clinical Collaboration Platform**.
    - On-Campus Intensives: Online pathway students attend three (3) mandatory 2-to-4-day on-campus clinical skills intensives at the Brookfield, Wisconsin or Nashville, Tennessee campuses (or on-ground skills labs at the Kenosha, Wisconsin campus for the hybrid track).
- Admission & Prerequisite Standards:
    - Non-nursing bachelor's or graduate degree from an accredited institution with a minimum 3.00 cumulative GPA;
    - Minimum aggregate score of 66% on the Test of Essential Academic Skills (TEAS) (no GRE required; 78+ TEAS or 3.8+ entry GPA qualifies for the 10% Nurses Circle of Achievement Scholarship);
    - Completion of 17.00 credits of prerequisite science/statistics courses (minimum grade of "B" [80%] or better strictly required in SC 154 Anatomy & Physiology I and SC 254 Anatomy & Physiology II; minimum "C" [70%] or better in MA 320 Statistics, SC 166 Microbiology, and SC 186 Chemistry) (**Herzing Graduate Catalog**).
- Tuition & Financial Structure (Effective Through Summer 2027):
    - Cost per Credit: $790.00 per semester credit hour
    - Base Tuition (77 Credits): $60,830.00 (Reduced by -$13,430.00 to $47,400.00 when transferring all 17.00 prerequisite credits)
    - Per-Semester Program Fee: $850.00 per semester
    - Per-Semester Learner Resource Fee: $555.00 per semester (Total Estimated Fees: $7,025.00 across 5 semesters; Total Net Estimated Cost with 17 Transfer Credits: $54,425.00) (**Herzing MSN-DE Program**).
- Official Verbatim Catalog Program Description:
  "The Master of Science in Nursing program with a direct entry pathway prepares students who have earned a non-nursing baccalaureate degree to obtain a registered nurse license and practice as an MSN nurse generalist in a variety of settings once state licensure is attained. The program focuses on care for patients across the lifespan and in diverse environments. Learning will include didactic, simulation, laboratory, and clinical learning opportunities. The program emphasizes the use of innovative technologies and preparation for assuming leadership roles. Clinical opportunities will provide the students to become an effective member of the interprofessional healthcare team through practice experiences that provide direct patient care in diverse areas." (**MSN-DE Official Program Outline**).

1.2 Official Program Learning Outcomes (Mapped to AACN Essentials Domains)

Upon completion of the MSN-DE program, graduates must demonstrate proficiency across eight institutional Program Outcomes mapped to the American Association of Colleges of Nursing (The Essentials: Core Competencies for Professional Nursing Education) (**MSN-DE Official Program Outline**):

1. Clinical Judgment & Person-Centered Care: Prioritize patient-centered care using clinical judgment and the nursing process (Domain 1: Knowledge for Nursing Practice; Domain 2: Person-Centered Care).
2. Cultural Competence & Interprofessional Collaboration: Collaborate with patients, families, and team members to provide safe and culturally competent care (Domain 3: Population Health; Domain 5: Quality and Safety).
3. Evidence-Based Scholarship: Integrate evidence-based practice within diverse clinical settings to deliver optimal care (Domain 4: Scholarship for the Nursing Discipline; Domain 7: Systems-Based Practice).
4. Risk Mitigation & Systems Safety: Minimize risk of harm to patients and providers through both systems effectiveness and individual performance (Domain 5: Quality and Safety).

5. Healthcare Informatics & Decision Support: Use informational technology to communicate, mitigate error, support decision making, and manage patient care (Domain 8: Informatics and Healthcare Technologies).
6. Continuous Quality Improvement: Evaluate quality improvement processes to enhance patient outcomes (Domain 5: Quality and Safety).
7. Interdisciplinary Leadership: Integrate professionalism and advanced leadership skills within the interdisciplinary healthcare environment (Domain 6: Interprofessional Partnerships; Domain 9: Professionalism; Domain 10: Personal, Professional, and Leadership Development).
8. Health Policy & Global Economics: Analyze national and global policies, legislative concepts, and economics to address population outcomes (Domain 3: Population Health; Domain 9: Professionalism).

1.3 Complete 77-Credit MSN-DE Curriculum & Contact Hour Registry

The table below consolidates every prerequisite, prelicensure clinical/didactic, and graduate DNP-bridge course from the **Herzing MSN-DE Website** and the **MSN-DE Official Program Outline**:

Course Code	Official Catalog Course Title	Credits	Lecture Hrs	Lab Hrs	Clinical Hrs	Total Contact Hrs	Prerequisites / Corequisites & Passing Benchmark
MA 320	Statistics	3.00	45.00	0.00	0.00	45.00	Prereq: MA 109 (or equivalent); Minimum Grade: C (70%) (Herzing Catalog).
SC 154	Anatomy and Physiology I for Nurses	4.00	45.00	30.00	0.00	75.00	Prereq: None; Minimum Grade: B (80%) Required (Herzing MSN-DE).
SC 166	Microbiology	3.00	30.00	30.00	0.00	60.00	Prereq: None; Minimum Grade: C (70%) (Herzing Catalog).
SC 186	Chemistry	3.00	30.00	30.00	0.00	60.00	Prereq: None; Minimum Grade: C (70%) (Herzing Catalog).
SC 254	Anatomy and Physiology II for Nurses	4.00	45.00	30.00	0.00	75.00	Prereq: SC 154; Minimum Grade: B (80%) Required (Herzing MSN-DE).

Course Code	Official Catalog Course Title	Credits	Lecture Hrs	Lab Hrs	Clinical Hrs	Total Contact Hrs	Prerequisites / Corequisites & Passing Benchmark
NSG 520	Pathophysiology and Pharmacology	4.00	60.00	0.00	0.00	60.00	Prereq: Admission to MSN-DE; Minimum Grade: B (80%) (Herzing MSN-DE).
NSG 521	Fundamental Concepts and Health Assessment	5.00	75.00	0.00	0.00	75.00	Coreq: NSG 522; Minimum Grade: B (80%) (Herzing MSN-DE).
NSG 522	**Clinical I**	2.00	0.00	30.00	45.00	75.00	Coreq: NSG 521; Minimum Grade: B (80%) + Progression Milestone Exam #1 (Herzing MSN-DE).
NSG 523	Medical Surgical Nursing I	4.00	60.00	0.00	0.00	60.00	Prereq: NSG 520, NSG 521, NSG 522; Coreq: NSG 525; Min: B (80%) + Dosage Calc Exam 04 (80%) (Herzing MSN-DE).
NSG 524	Mental Health Nursing	3.00	45.00	0.00	0.00	45.00	Prereq: NSG 520, NSG 521, NSG 522; Coreq: NSG 525; Min: B (80%) (Herzing MSN-DE).
NSG 525	**Clinical II**	3.00	0.00	0.00	135.00	135.00	Prereq: NSG 520, NSG 521, NSG 522; Coreq: NSG 523, NSG 524; Min: B (80%) (NSG 525 Syllabus).
NSG 526	**Family Nursing**	4.00	60.00	0.00	0.00	60.00	Prereq: NSG 523, NSG 524, NSG 525; Coreq: NSG 528; Min: B (80%) (NSG 526 Catalog).

Course Code	Official Catalog Course Title	Credits	Lecture Hrs	Lab Hrs	Clinical Hrs	Total Contact Hrs	Prerequisites / Corequisites & Passing Benchmark
NSG 527	Medical Surgical Nursing II	5.00	75.00	0.00	0.00	75.00	Prereq: NSG 523, NSG 524, NSG 525; Coreq: NSG 528; Min: B (80%) (Herzing MSN-DE).
NSG 528	**Clinical III**	3.00	0.00	0.00	135.00	135.00	Prereq: NSG 523, NSG 524, NSG 525; Coreq: NSG 526, NSG 527; Min: B (80%) + Milestone Exam #2 (NSG 528 Catalog).
NSG 621	**Clinical IV**	3.00	0.00	0.00	135.00	135.00	Prereq: NSG 526, NSG 527, NSG 528; Min: B (80%) + Milestone Exam #3 (Pharmacology) (NSG 621 ACEMAPP).
NSG 631	**Synthesis I**	3.00	30.00	0.00	45.00	75.00	Prereq: NSG 526, NSG 527, NSG 528; Min: B (80%) (NSG 631 Syllabus).
NSG 632	Synthesis II	3.00	15.00	0.00	90.00	105.00	Prereq: NSG 526, NSG 527, NSG 528, NSG 621, NSG 631; Coreq: NSG 635; Min: B (80%) (Herzing MSN-DE).
NSG 633	Safety and Quality	3.00	45.00	0.00	0.00	45.00	Prereq: None; Minimum Grade: B (80%) (Herzing MSN-DE).

Course Code	Official Catalog Course Title	Credits	Lecture Hrs	Lab Hrs	Clinical Hrs	Total Contact Hrs	Prerequisites / Corequisites & Passing Benchmark
NSG 635	Integration of Concepts	3.00	45.00	0.00	0.00	45.00	Prereq: NSG 526–528, NSG 621, NSG 631; Coreq: NSG 632; Min: B (80%) + RN Exit Exam Benchmark (Herzing MSN-DE).
NSG 660	Scholarly Practice	3.00	45.00	0.00	0.00	45.00	Prereq: MA 320; Minimum Grade: B (80%) (Herzing MSN-DE).
NU 725 (formerly NSG 625)	**Technology and Nursing Informatics in Advanced Practice**	3.00	45.00	0.00	0.00	45.00	DNP Dual-Credit Core; Prereq: None; Minimum Grade: B (80%) (Herzing MSN-DE).
NU 730 (formerly NSG 630)	**Systems-Based Practice**	3.00	45.00	0.00	0.00	45.00	DNP Dual-Credit Core; Prereq: None; Minimum Grade: B (80%) (Herzing MSN-DE).
NU 780 (formerly NSG 680)	**Population Health**	3.00	45.00	0.00	0.00	45.00	DNP Dual-Credit Core; Prereq: None; Minimum Grade: B (80%) (Herzing MSN-DE).
TOTALS	All Required Prerequisite & Graduate Nursing Courses	77.00	885.00	150.00	585.00	1,620.00	60.00 Nursing Credits + 17.00 Prerequisite Credits (Herzing MSN-DE).

SECTION 2: REQUIRED COURSE TEXTBOOKS, DIGITAL PLATFORMS, & STRICT ISBN REGISTRY

All required digital textbooks, Elsevier Sherpath interactive modules, Elsevier Adaptive Quizzing (EAQ), HESI standardized exam packages, and Wolters Kluwer vSim/DocuCare simulations are provisioned through the Canvas LMS under the per-semester Learner Resource Fee ($555.00/semester):

Course Alignment	Textbook Title, Authors, Edition, & Publisher	Verified Print & Digital VitalSource ISBN-13 Registry
NSG 520 (Pathophysiology Component)	McCance & Huether's Pathophysiology: The Biologic Basis for Disease in Adults and Children — Julia Rogers (Kathryn L. McCance & Sue E. Huether), 9th Edition (2023), **Elsevier** (1,736 pages)	Hardcover ISBN-13: 978-0323789875 / ISBN-10: 0323789870 | E-Book ISBN-13: 978-0323789899 | Study Guide ISBN-13: 978-0323874984
NSG 520 (Pharmacology Component)	Pharmacology and the Nursing Process — Linda Lane Lilley, Shelly Rainforth Collins, & Julie S. Snyder, 10th Edition (2023), **Elsevier / Mosby** (11th Ed. 2026 ISBN 978-0443119415)	Paperback ISBN-13: 978-0323827973 | VitalSource E-Book ISBN-13: 978-0323828017 / 978-0323828000 | Study Guide ISBN-13: 978-0323828055
NSG 521 & NSG 522 (Fundamentals Component)	Fundamentals of Nursing — Patricia A. Potter, Anne G. Perry, Patricia A. Stockert, & Amy M. Hall, 11th Edition (2023), **Elsevier / Mosby** (12th Ed. 2026 ISBN 978-0443124068)	Hardcover ISBN-13: 978-0323810340 | E-Book ISBN-13: 978-0323812153 | Clinical Companion Package ISBN-13: 978-0323875035
NSG 521 & NSG 522 (Health Assessment Component)	Physical Examination and Health Assessment — Carolyn Jarvis & Ann L. Eckhardt, 9th Edition (2024), **Elsevier / Saunders**	Hardcover ISBN-13: 978-0323809849 | E-Book ISBN-13: 978-0323811705 | Binder-Ready ISBN-13: 978-0323827799
NSG 523, NSG 525, NSG 527, NSG 528, & NSG 621 (Med-Surg I & II)	Lewis's Medical-Surgical Nursing: Assessment and Management of Clinical Problems — Mariann M. Harding, Jeffrey Kwong, Debra Hagler, & Courtney Reinisch, 12th Edition (2023), **Elsevier**	Hardcover ISBN-13: 978-0323789615 | Enhanced E-Book ISBN-13: 978-0323824957
NSG 524 & NSG 525 (Mental Health Nursing)	Varcarolis' Foundations of Psychiatric-Mental Health Nursing: A Clinical Approach — Margaret Jordan Halter, 9th Edition (2022), **Elsevier / Saunders**	Paperback ISBN-13: 978-0323697071 | E-Book ISBN-13: 978-0323697088 | VitalSource E-Book ISBN-13: 978-0323697095
NSG 526 & NSG 528 (Family Nursing: OB & Pediatrics)	Maternal Child Nursing Care — Shannon E. Perry, Marilyn J. Hockenberry, Kitty Cashion, Kathryn Rhodes Alden, Ellen Olshansky, & Deitra Leonard Lowdermilk, 7th Edition (2022), **Elsevier / Mosby**	Hardcover ISBN-13: 978-0323776714 | E-Book ISBN-13: 978-0323825870 | VitalSource E-Book ISBN-13: 978-0323825856 | Study Guide ISBN: 978-0323809092
NSG 660, NSG 631, & NSG 632 (Scholarly Practice & Synthesis I–II)	Nursing Research: Methods and Critical Appraisal for Evidence-Based Practice — Geri LoBiondo-Wood & Judith Haber, 10th Edition (2022), **Elsevier** (11th Ed. 2025 ISBN 978-0443246180)	Paperback ISBN-13: 978-0323762915 | VitalSource E-Book ISBN-13: 978-0323762922 / 978-0323762939

Course Alignment	Textbook Title, Authors, Edition, & Publisher	Verified Print & Digital VitalSource ISBN-13 Registry
NSG 633 & NU 730 (Safety, Quality, & Systems Practice)	Leading and Managing in Nursing — Patricia S. Yoder-Wise & Susan Sportsman, 8th Edition (2023), **Elsevier / Mosby**	Paperback ISBN-13: 978-0323792066 | E-Book ISBN-13: 978-0323792073 | VitalSource ISBN-13: 978-0323793131
NU 725 (Nursing Informatics)	Nursing Informatics and the Foundation of Knowledge — Dee McGonigle & Kathleen Garver Mastrian, 5th Edition (2021) / 6th Edition (2025), **Jones & Bartlett Learning**	5th Ed. Paperback ISBN-13: 978-1284220469 / E-Book: 978-1284234701 | 6th Ed. VitalSource E-Book ISBN-13: 978-1284300628
NU 780 (Population Health)	Public Health Nursing: Population-Centered Health Care in the Community — Marcia Stanhope & Jeanette Lancaster, 11th Edition (2024), **Elsevier**	Paperback ISBN-13: 978-0323882828 / ISBN-10: 032388282X | E-Book ISBN-13: 978-0323884181
Dosage Calculation Benchmark Across Curriculum	Calculate with Confidence — Deborah C. Morris, 8th Edition (2022), Elsevier / Mosby (Required for Dosage Calculation Exams across NSG 520–527)	Paperback ISBN-13: 978-0323696951 | Elsevier E-Book on VitalSource ISBN-13: 978-0323696968

SECTION 3: VERBATIM COURSE SYLLABI & UNIT-BY-UNIT CURRICULUM EXPANSIONS

3.1 Verbatim Course Syllabus Expansion — NSG 523: Medical Surgical Nursing I (4.00 Credits, 60 Contact Hours)

- Official Course Description: "This course is designed to develop application of the nursing process in the care of acute and chronically ill patients. The role of the medical-surgical nurse is examined across roles, including the role of coordinator of care transitions. Interprofessional collaboration is emphasized to enhance safe, quality nursing care in a variety of clinical settings. Course content and clinical experiences integrate the concepts of caring, collaboration, communication, cultural sensitivity, community, and clinical judgment to facilitate the wellbeing of individuals and to prepare the student as a provider of care. In the clinical setting, students will care for patients with select medical and/or surgical problems in various settings, state knowledge of pathophysiology and psychosocial dynamics, apply the nursing process, utilize information technology, interact with other health care professionals, and practice clinical decision making and critical inquiry while caring for culturally diverse, ill adults."
- Course Learning Objectives:
    1. Implement critical thinking in the management of care of medical/surgical patients.
    2. Integrate scientific evidence from nursing and biopsychosocial disciplines, and safety and quality improvement when implementing care for patients with acute and chronic illness.
    3. Educate patients with physiologic and psychosocial health needs within the context of health promotion and maintenance.
    4. Integrate professionalism and collaboration to promote the well-being of the adult patient and/or family.

5. Prioritize patient-centered care using clinical judgment and the nursing process.

- Complete 16-Unit Schedule, Readings (Harding et al., Lewis's Medical-Surgical Nursing, 12th Ed.), Sherpath Lessons, EAQ Quizzes, & HESI Exams:
  - Unit 1: Introduction to the Acute Care Setting — Reading: Ch. 1 (Professional Nursing). Assignments: Unit 1 Discussion (5 pts); Sherpath Lessons (10 pts each): Professional Nursing Practice and Its Influences (26 min), Patient-Centered Care and Interprofessional Partnerships (36 min), Safety, Quality Improvement, Informatics, and Evidence-Based Practice (30 min). Quiz: Unit 1 EAQ Quiz: Professional Nursing (50 Qs, 20 pts).
  - Unit 2: Nursing Management of Fluid, Electrolytes, & Acid-Base Balance — Topics: Hypovolemia & Hypervolemia, IV Fluids, Acid-Base Balance. Reading: Ch. 17 (Fluid, Electrolyte, and Acid-Base Imbalances). Assignments: Sherpath Lessons (10 pts each): Homeostasis (50 min), Fluid Volume and Electrolyte Imbalances (1 hr 7 min), Acid-Base Imbalances and Fluid and Electrolyte Replacement (1 hr). Quiz: Unit 2 EAQ Quiz: Acid-Base Imbalances, Electrolyte Balance and Imbalance, Fluid Balance and Imbalance (50 Qs, 20 pts).
  - Unit 3: Perioperative Nursing Care — Topics: Pre-Operative, Intraoperative, and Post-Operative Care. Reading: Ch. 18 (Preoperative Care), Ch. 19 (Intraoperative Care), Ch. 20 (Postoperative Care). Assignments: Sherpath Lessons (10 pts each): Nursing Management: Preoperative Patient (30 min), Nursing Management: Patient Before, During, and After Surgery (27 min), Postoperative Care of Surgical Patient and Postsurgical Respiratory, Cardiovascular, Neurologic, and Psychological Problems, Plus Pain (1 hr 4 min). Quiz: Unit 3 EAQ Quiz: Preoperative Care (50 Qs, 20 pts).
  - Unit 4: Nursing Care of Patients with Disorders of the Respiratory System — Topics: Pneumonia, COPD, Asthma, Tuberculosis. Reading: Ch. 30 (Lower Respiratory Problems), Ch. 31 (Obstructive Pulmonary Diseases). Assignments: Sherpath Lessons (10 pts each): Lower Respiratory Tract Infections (1 hr 21 min), Chronic Obstructive Pulmonary Disease (COPD) and COPD Care (1 hr 14 min), Asthma and Asthma Care (1 hr 23 min); HESI Exam 1 ProctorU Assignment (C/I). Quizzes (20 pts each / P/F): Unit 4 Quiz: Respiratory Problems NGN (7 Qs), Unit 4 Quiz: Lower Respiratory Tract Infections (50 Qs).
  - Unit 5: Nursing Care of Patients with Disorders of the Gastrointestinal System – Part I — Topics: Crohn's Disease, Ulcerative Colitis, GERD, Obesity, Diseases of Motility. Reading: Ch. 47 (Lower Gastrointestinal Problems), Ch. 46 (Upper Gastrointestinal Problems), Ch. 45 (Obesity). Assignments: Sherpath Lessons (10 pts each): Irritable Bowel Syndrome, Appendicitis, Peritonitis, Gastroenteritis, Inflammatory Bowel Disease, and Bowel Obstruction (59 min), Diarrhea, Fecal Incontinence, Constipation, Acute Abdominal Pain, and Abdominal Trauma (1 hr 2 min), Esophageal Disorders (58 min). Quizzes (20 pts each): Unit 5 Quiz: Gastrointestinal NGN (7 Qs), Unit 5 Quiz: Upper Gastrointestinal Problems, Lower Gastrointestinal Problems (50 Qs).
  - Unit 6: Nursing Care of Patients with Disorders of the Gastrointestinal System – Part II — Topics: Small and Large Bowel Obstruction, Enteral and Parenteral Nutrition, Gall Bladder Disease, Peptic Ulcer Disease, Appendicitis, Peritonitis & Diverticular Disease. Reading: Ch. 47 (Lower GI), Ch. 44 (Nutrition Problems), Ch. 48 (Liver, Biliary Tract, and Pancreas Problems), Ch. 46 (Upper GI). Assignments: Sherpath Lessons (10 pts each): IBS, Appendicitis, Peritonitis, Gastroenteritis, IBD, and Bowel Obstruction (59 min), Biliary Tract Disorders (47 min), Peptic Ulcer Disease and Stomach Cancer (58 min). Quiz: Unit 6 Quiz: Lower GI, Liver, Biliary Tract, and Pancreas Problems (50 Qs, 20 pts). Major Assessment: HESI Exam 1 (100 pts).
  - Unit 7: Nursing Care of Patients with Disorders of the Cardiovascular & Hematological Systems — Topics: Hypertension, Heart Failure, Anemias, Thrombocytopenia & Platelet Defects, Peripheral Vascular Occlusion Disease. Reading: Ch. 36 (Hypertension), Ch. 38 (Heart Failure), Ch. 34 (Hematologic Problems), Ch. 41 (Vascular Disorders). Assignments: Sherpath Lessons (10 pts each): Blood Pressure and Hypertension (49 min), Primary Hypertension

and Hypertensive Crisis Care (59 min), Nursing Management of Heart Failure and Heart Transplantation (46 min), Hematologic Problems Related to Red Blood Cells: Part 1 (59 min), Hematologic Problems Related to Coagulation (1 hr 6 min), Acute and Chronic Venous Disorders (1 hr 7 min); HESI Personalized Learning Plans (100 pts). Quizzes (20 pts each): Unit 7 Quiz: Anemia, DIC, Neutropenia, MDS, Hypertension, Heart Failure (50 Qs), Unit 7 Quiz: Cardio NGN (7 Qs), Unit 7 Quiz: Hematologic NGN (7 Qs).

- Unit 8: Nursing Care of Patients with Disorders of the Genitourinary & Renal Systems — Topics: Benign Prostatic Hyperplasia, Erectile Dysfunction, Urinary Incontinence, UTI/Sepsis, Renal Calculi. Reading: Ch. 59 (Male Reproductive Problems), Ch. 50 (Renal and Urologic Problems). Assignments: Sherpath Lessons (10 pts each): Problems of the Prostate Gland (1 hr 5 min), Renal Vascular Problems, Hereditary Kidney Diseases, Urinary Tract Tumors, and Bladder Dysfunction (1 hr 10 min), Infectious and Inflammatory Disorders of Urinary System (53 min). Quiz: Unit 8 Quiz: Male Reproductive Problems (50 Qs, 20 pts).
- Unit 9: Nursing Care of Patients with Disorders of the Neurological System — Topics: Dementia and Alzheimer's Disease, Parkinson's Disease, Headache. Reading: Ch. 64 (Dementia and Delirium), Ch. 63 (Chronic Neurologic Problems). Assignments: Sherpath Lessons (10 pts each): Interprofessional Care and Nursing Management: Alzheimer Disease (50 min), Multiple Sclerosis and Parkinson Disease (59 min), Headaches (42 min); ProctorU Assignment (C/I). Quiz: Unit 9 Quiz: Headaches, Dementia, and Delirium (50 Qs, 20 pts).
- Unit 10: Nursing Care of Patients with Sensory & Seizure Disorders — Topics: Seizures, Epilepsies, Visual Problems. Reading: Ch. 63 (Chronic Neurologic Problems), Ch. 22 (Assessment and Management: Visual Problems). Assignments: Sherpath Lessons (10 pts each): Chronic Neurologic Disorders (57 min), Intraocular Disorders (1 hr 3 min). Quiz: Unit 10 Quiz: Assessment and Management, Visual Problems (50 Qs, 20 pts).
- Unit 11: Nursing Care of Patients with Disorders of the Endocrine System (Thyroid) — Topics: Hypothyroidism, Hyperthyroidism. Reading: Ch. 54 (Endocrine Problems). Assignment: Sherpath Lesson (10 pts): Thyroid Gland Problems (1 hr 7 min). Quiz: Unit 11 Quiz: Endocrine Problems (50 Qs, 20 pts). Major Assessment: HESI Exam 2 (100 pts).
- Unit 12: Nursing Care of Patients with Disorders of the Endocrine System (Diabetes) — Topics: Diabetes, Diabetes Management, Pharmacological Management of Diabetes. Reading: Ch. 53 (Diabetes). Assignments: Sherpath Lessons (10 pts each): Diabetes and Drug Therapies (1 hr 9 min), Other Diabetes Therapies and Nursing Management (52 min), Complications of Diabetes (1 hr); HESI Personalized Learning Plans (100 pts). Quizzes (20 pts each): Unit 12 Quiz: Diabetes (50 Qs), Unit 12 Quiz: Endocrine NGN (7 Qs).
- Unit 13: Nursing Care of Patients with Disorders of the Immune System — Topics: Rheumatoid Arthritis (RA), Systemic Lupus Erythematosus (SLE). Reading: Ch. 69 (Arthritis and Connective Tissue Diseases). Assignments: Sherpath Lessons (10 pts each): Osteoarthritis and Rheumatoid Arthritis (1 hr 20 min), Systemic Lupus Erythematosus and Scleroderma (59 min); ProctorU Assignment (C/I). Quiz: Unit 13 Quiz: Arthritis and Connective Tissue Diseases (50 Qs, 20 pts).
- Unit 14: Nursing Care of Patients with Disorders of the Musculoskeletal System — Topics: Osteoporosis, Osteoarthritis, Gout. Reading: Ch. 68 (Musculoskeletal Problems), Ch. 69 (Arthritis and Connective Tissue Diseases). Assignments: Sherpath Lessons (10 pts each): Metabolic Bone Diseases (34 min), Osteoarthritis and Rheumatoid Arthritis (1 hr 20 min), Gout, Lyme Disease, Septic Arthritis, and Spondyloarthropathies (42 min). Quiz: Unit 14 Quiz: Musculoskeletal Problems, Arthritis and Connective Tissue Diseases (50 Qs, 20 pts).
- Unit 15: Final Exam — Cumulative Final Exam Prep & HESI Final Exam (100 pts) + Dosage Calculation Exam 04 (80% minimum required within 2 attempts to progress to NSG 527).

    - Unit 16: Final Reflection — Final reflection discussion on course objectives (5 pts).
- NSG 523 Grading Scheme: Assignments (Sherpath Lessons, Discussions): 5% | Remediation / Personalized Learning Plans: 5% | Quizzes (Sherpath EAQ Quizzes): 10% | HESI Unit Exams (Exams 1 & 2): 40% | HESI Final Exam: 40% | Total: 100% (Minimum Passing Grade: 80.00% B).

3.2 Verbatim Course Syllabus Expansion — NSG 525: Clinical II — Medical Surgical I & Mental Health Nursing (3.00 Credits, 135 Clinical Hours)

- Official ACEMAPP Syllabus Description (**NSG 525 Syllabus**): "This course is designed to develop application of the nursing process in the care of acutely and chronically ill patients, as well as patients with mental health disorders. The roles of medical-surgical and mental health nurses are examined across roles, including the role of coordinator of care transitions. Interprofessional collaboration is emphasized to enhance safe, quality nursing care in a variety of clinical settings."
- Course Learning Objectives (Clinical, Simulation, & Didactic Integration):
    - Provide safe and effective care to enhance patient outcomes in adult medical-surgical and mental health patient care settings;
    - Demonstrate patient-centered care using clinical judgment in the decision-making process;
    - Effectively demonstrate use of the electronic health record (EHR / Lippincott DocuCare) and virtual simulation (vSim) to promote safe and effective interprofessional communication.
- Complete 16-Unit Clinical & Simulation Schedule (**NSG 525 ACEMAPP Syllabus**):
    - Unit 1: Med-Surg: Acute Care Environment & Interprofessional Collaborative Practice | Mental Health: Interpersonal Communication, Legal & Ethical Issues, Treatment Modalities. Deliverables: Intro Discussion (50 pts), Timesheet (C/I), Student Professionalism Agreement (C/I).
    - Unit 2: Med-Surg: Fluid/Electrolyte/Acid-Base Balance | Mental Health: Legal/Ethical Issues & Therapeutic Programs. Deliverables: Clinical/Non-Clinical Reflection (50 pts), Timesheet (C/I).
    - Unit 3: Med-Surg: Perioperative Nursing Care | Mental Health: Psychiatric Mental Health Assessment (Subjective/Objective). Deliverable: Timesheet (C/I).
    - Unit 4: Med-Surg: Respiratory System Disorders | Mental Health: Loss & Grief. Deliverables: Clinical Reflection (50 pts), Timesheet (C/I).
    - Unit 5: Med-Surg: GI Disorders Part I (Crohn's, UC, GERD, Obesity, Motility) | Mental Health: Anger, Hostility, & Disruptive Behavior. Deliverable: Timesheet (C/I).
    - Unit 6: Med-Surg: GI Disorders Part II (Bowel Obstruction, Enteral/Parenteral Nutrition, Gallbladder, PUD, Appendicitis, Peritonitis, Diverticulitis) | Mental Health: Addiction & Dependence. Deliverables: Clinical Reflection (50 pts), Timesheet (C/I).
    - Unit 7: Med-Surg: Cardiovascular System Disorders | Mental Health: Anxiety Disorders. Deliverable: Timesheet (C/I).
    - Unit 8: Med-Surg: Hematological System Disorders (Anemias, Thrombocytopenia, PAD) | Mental Health: Somatic Symptom Illnesses & Sleep/Wakefulness Disorders. Deliverables: Clinical Reflection (50 pts), Timesheet (C/I).
    - Unit 9: Med-Surg: Genitourinary & Renal Systems | Mental Health: Mood Disorders. Deliverable: Timesheet (C/I).
    - Unit 10: Med-Surg: Neurological System (Dementia, Alzheimer's, Parkinson's, Headache) | Mental Health: Eating & Obsessive-Compulsive Disorders. Deliverables: Clinical Reflection (50 pts), Timesheet (C/I).
    - Unit 11: Med-Surg: Seizures & Epilepsies | Mental Health: Personality Disorders. Deliverable: Timesheet (C/I).

    - Unit 12: Med-Surg: Hypo/Hyperthyroidism | Mental Health: Schizophrenia. Deliverables: Clinical Reflection (50 pts), Timesheet (C/I).
    - Unit 13: Med-Surg: Diabetes Mellitus | Mental Health: Neurodevelopmental & Cognitive Disorders. Deliverables: Abbreviated Care Plan (100 pts), Timesheet (C/I).
    - Unit 14: Med-Surg: Immune System Disorders | Mental Health: Abuse, Violence, Trauma, & Stressor-Related Disorders. Deliverables: Full Care Plan (100 pts), Timesheet (C/I).
    - Unit 15: Med-Surg: Musculoskeletal System Disorders | Mental Health: Suicide. Deliverables: Final Clinical Paperwork (C/I), Timesheet (C/I).
    - Unit 16: Pulling It All Together & Looking Ahead. Deliverables: Clinical Goals: Final Self-Evaluation (50 pts), Timesheet (C/I).
- NSG 525 Grading Scheme (1,000-Point Scale; 800/1,000 pts [80%] Required to Pass): Discussion Board: 50 pts | vSim & DocuCare Assignments: 400 pts | Clinical Reflections & Final Self-Evaluation (7 × 50 pts): 350 pts | Clinical Evaluation: 100 pts | Care Plans (Abbreviated + Full): 100 pts | Total: 1,000 pts.

3.3 Verbatim Course Syllabus Expansion — NSG 526: Family Nursing (4.00 Credits, 60 Contact Hours)

- Official Course Description (**NSG 526 Catalog**): "This course introduces the student to family-centered care and the health needs of the childbearing family. Students review concepts, skills, and techniques needed to care for culturally diverse maternal, infant, and pediatric patients and their families. The nursing process is utilized to emphasize the concepts of family-centered care, collaboration, communication, cultural competence, and community. The clinical experiences focus on concepts and skills required to provide safe and evidence-based care in a variety of clinical settings."
- Course Learning Objectives:
    1. Integrate knowledge and skills to enhance outcomes for maternal, infant, and pediatric patients and their families.
    2. Evaluate acute and chronic conditions throughout the lifespan to provide family-centered care.
    3. Educate maternal, infant, and pediatric patients and their families with acute and psychosocial needs within the context of health promotion and maintenance.
    4. Apply the nursing process to deliver evidence-based, patient-centered care across the lifespan.
- Complete 16-Unit Schedule & Readings (Perry, Hockenberry, et al., Maternal Child Nursing Care, 7th Ed.):
    - Unit 1: Women's Health Disorders — Ch. 1–5 (21st-Century Maternity Nursing; Family, Culture, and Home Care; Assessment and Health Promotion; Reproductive System Concerns; Infertility, Contraception, and Abortion). 8 Sherpath Lessons (10 pts each), Unit 1 Discussion (5 pts), 2 EAQ Custom Quizzes & 1 EAQ Proficiency Quiz (20 pts each).
    - Unit 2: Fetal Development & Pregnancy — Ch. 6–9 (Genetics, Conception, and Fetal Development; Anatomy and Physiology of Pregnancy; Nursing Care of the Family During Pregnancy; Maternal and Fetal Nutrition). 8 Sherpath Lessons (10 pts each), 2 EAQ Custom Quizzes & 1 EAQ Proficiency Quiz (20 pts each).
    - Unit 3: Nursing Care During Labor and Delivery — Ch. 13–16 (Labor and Birth Processes; Maximizing Comfort for the Laboring Woman; Fetal Assessment During Labor; Nursing Care of the Family During Labor and Birth). 8 Sherpath Lessons (10 pts each), 2 EAQ Custom Quizzes & 1 EAQ Proficiency Quiz (20 pts each).
    - Unit 4: Nursing Care During Postpartum Period — Ch. 18–20 (Postpartum Physiologic Changes; Nursing Care of the Family During the Postpartum Period; Transition to Parenthood). 3 Sherpath Lessons (10 pts each), HESI

Remediation Packet (100 pts), 1 EAQ Custom Quiz & 1 EAQ Proficiency Quiz (20 pts each).
- Unit 5: Nursing Care of the Well Newborn — Ch. 22–24 (Physiologic and Behavioral Adaptations of the Newborn; Nursing Care of the Newborn and Family; Newborn Nutrition and Feeding). 3 Sherpath Lessons (10 pts each), 2 EAQ Custom Quizzes & 1 EAQ Proficiency Quiz (20 pts each).
- Unit 6: Nursing Care of the Patient with Childbearing Risks — Ch. 6, 10–12, 17, 21 (Assessment of High-Risk Pregnancy; Preexisting & Gestational Conditions; Labor and Birth Complications; Postpartum Complications). 16 Sherpath Lessons (10 pts each), 2 EAQ Custom Quizzes & 1 EAQ Proficiency Quiz (20 pts each).
- Unit 7: Nursing Care of Newborn at Risk — Ch. 25 (The High-Risk Newborn). 4 Sherpath Lessons (10 pts each), 1 EAQ Proficiency Quiz (20 pts).
- Unit 8: Foundations of Pediatric Nursing — Ch. 26, 27, 30, 39 (21st-Century Pediatric Nursing; Social, Cultural, Religious, and Family Influences; Pain Assessment and Management in Children; Pediatric Nursing Interventions and Skills). Unit 8 Discussion (5 pts), 12 Sherpath Lessons (10 pts each), HESI Remediation Packet (100 pts), 2 EAQ Custom Quizzes & 1 EAQ Proficiency Quiz (20 pts each), HESI Exam 1 / Mid-Course Exam (100 pts).
- Unit 9: Health Promotion and Assessment of the Growing Child and Family — Ch. 31–35 (The Infant and Family; The Toddler and Family; The Preschooler and Family; The School-Age Child and Family; Health Promotion of the Adolescent and Family). HESI Remediation Packet (100 pts), 22 Sherpath Lessons (10 pts each), 5 EAQ Custom Quizzes (20 pts each).
- Unit 10: Comprehensive Assessment of the Child in the Primary and Acute Care Settings — Ch. 29, 38 (Communication and Physical Assessment of the Child and Family; Family-Centered Care of the Child During Illness and Hospitalization). 5 Sherpath Lessons (10 pts each), 1 EAQ Custom Quiz & 1 EAQ Proficiency Quiz (20 pts each).
- Unit 11: The Child with an Infectious/Communicable Disorder, Alteration in Tissue Integrity, Gas Exchange, or Sensory Perception — Ch. 37, 40, 50 (Impact of Cognitive or Sensory Impairment; Respiratory Dysfunction; Integumentary Dysfunction). 11 Sherpath Lessons (10 pts each), 2 EAQ Custom Quizzes & 1 EAQ Proficiency Quiz (20 pts each).
- Unit 12: The Child with Alteration in Perfusion/Cardiovascular, Bowel Elimination, and Urinary Elimination — Ch. 41, 42, 45 (Gastrointestinal Dysfunction; Cardiovascular Dysfunction; Genitourinary Dysfunction). 13 Sherpath Lessons (10 pts each), 2 EAQ Custom Quizzes & 1 EAQ Proficiency Quiz (20 pts each), HESI Exam 2 (100 pts).
- Unit 13: The Child with Alteration in Cellular Regulation/Hematologic or Neoplastic, Immunity, and Metabolism (Endocrine) — Ch. 43, 44, 47 (Hematologic or Immunologic Dysfunction; The Child with Cancer; Endocrine Dysfunction). 11 Sherpath Lessons (10 pts each), HESI Remediation Packet (100 pts), 2 EAQ Custom Quizzes & 1 EAQ Proficiency Quiz (20 pts each).
- Unit 14: The Child with Alteration in Mobility, Intracranial Regulation, Genetics, and Behavior/Cognition — Ch. 28, 36, 46, 48, 49 (Developmental and Genetic Influences; Chronic Illness, Disability, or End-of-Life Care; Cerebral Dysfunction; Musculoskeletal/Articular Dysfunction; Neuromuscular/Muscular Dysfunction). 11 Sherpath Lessons (10 pts each), 2 EAQ Custom Quizzes & 1 EAQ Proficiency Quiz (20 pts each).
- Unit 15: Pulling It All Together – Pediatric Care — Unit 15 Discussion (5 pts), HESI Final Exam (100 pts).
- Unit 16: Final Reflection — Unit 16 Discussion (5 pts).

- NSG 526 Grading Scheme: Assignments (Sherpath Lessons, Discussions): 5% | Quizzes (Sherpath EAQ Quizzes): 10% | Remediation Packets: 5% | HESI Unit Exams: 40% | HESI Final Exam: 40% | Total: 100%.

3.4 Verbatim Course Syllabus Expansion — NSG 631: Synthesis I (3.00 Credits: 30 Lecture Hours / 45 Clinical Hours = 75 Contact Hours)

- Official ACEMAPP Syllabus Description (**NSG 631 Syllabus PDF**): "This is the first of two courses focused on designing and preparing your MSN project, which is focused on improving clinical practice. In this course, students will identify a clinical problem, describe the focus and context of their project, and assemble evidence supporting their project."
- Course Learning Objectives:
    1. Utilize health data and current evidence to inform efforts to promote health, reduce risk, and eliminate disparities.
    2. Create a proposal for an evidence-based practice capstone project.
    3. Collaborate with interprofessional colleagues for planning of a capstone project.
    4. Initiate translation of evidence into practice to address an identified health risk, need, or disparity.
- Complete 8-Unit Schedule & Point Allocations (**NSG 631 Syllabus PDF**):
    - Unit 1: Introduction to the MSN Capstone — Introduction Discussion (C/I); Unit 1 Discussion Forum: Big Picture of the Problem (100 pts).
    - Unit 2: Clinical Problems & PICOT Questions — Unit 2 Discussion Forum: PICOT Question (100 pts); MSN Project Log & Journal (15 pts); Unit 2 Assignment: Mentor Agreement Form (20 pts).
    - Unit 3: Conceptual & Theoretical Frameworks — Unit 3 Discussion Forum: Project Framework & Evidence-Based Practice Models (100 pts); MSN Project Log & Journal (15 pts).
    - Unit 4: Literature Search — Conducting a systematic literature search and organizing supporting evidence; MSN Project Log & Journal (15 pts).
    - Unit 5: Literature Review Research — Unit 5 Assignment: Literature Review Matrix (Table) (150 pts); MSN Project Log & Journal (15 pts).
    - Unit 6: Project Implementation Strategies — Unit 6 Assignment: Strategy & Methods Paper (Project Implementation and Outcome Measures) (150 pts); MSN Project Log & Journal (15 pts).
    - Unit 7: Formal Literature Review — Unit 7 Assignment: Formal Literature Review Paper (150 pts); MSN Project Log & Journal (15 pts); Summative (Final) Preceptor/Mentor Evaluation (25 pts).
    - Unit 8: Reflection & Next Steps (Transition to NSG 632: Synthesis II) — Unit 8 Discussion: Final Course Reflection (100 pts); MSN Project Log & Journal (15 pts).
- NSG 631 Grading Scheme: Discussion Board Assignments: 40% | Written Assignments, Literature Matrix/Papers, and MSN Project Logs: 60% | Total: 100% (Minimum Passing Grade: 80.00% B).

SECTION 4: GRANULAR ASSIGNMENT PROMPTS ("PROMPT DETAIL" & "TWICE THE DETAIL") FOR GRADUATE CORE & DNP-BRIDGE COURSES

To match the exact milestone scaffolding of the MS-HHSL syllabus, below are the granular assignment prompts (Prompt Detail and Twice the Detail) for the graduate research, safety/quality, informatics, systems-based practice, and population health courses in the MSN-DE curriculum:

4.1 NSG 660 — Scholarly Practice (3.00 Credits, 45 Contact Hours)

- Milestone 1: Clinical PICOT Formulation & Quantitative/Qualitative Evidence Appraisal Matrix
    - Prompt Detail: Identify a high-priority clinical nursing problem (such as hospital-acquired pressure injuries, catheter-associated urinary tract infections, or psychiatric readmission rates). Construct a structured PICOT question and critically appraise ten peer-reviewed empirical studies (five quantitative and five qualitative) using LoBiondo-Wood and Haber's (2022) hierarchy of evidence.
    - Twice the Detail: Operating as a comprehensive's-prepared clinical nurse scholar, you will formulate an actionable Population-Intervention-Comparison-Outcome-Time (PICOT) inquiry and execute a systematic database search across PubMed, CINAHL, and Cochrane Library. Your submitted appraisal matrix must dissect five quantitative studies (evaluating randomized controlled trials vs. quasi-experimental designs, sample power calculations, statistical significance [p-values, confidence intervals], and internal/external validity threats) alongside five qualitative studies (evaluating phenomenological, grounded theory, or ethnographic methodologies, saturation, and trustworthiness). You must synthesize these ten studies into a 1,500-word critical appraisal defending whether sufficient empirical evidence exists to change bedside clinical practice.
- Milestone 2: Human Subjects Protection (IRB) Protocol & Evidence-Based Research/QI Proposal
    - Prompt Detail: Draft a complete research or quality improvement (QI) grant proposal addressing your PICOT question. Your proposal must detail sampling procedures, measurement instruments, statistical analysis plans, budget justifications, and federal Institutional Review Board (IRB) human subjects protections.
    - Twice the Detail: This capstone milestone of NSG 660 requires authoring a formal 2,500-word Research and Quality Improvement Proposal formatted to federal National Institute of Nursing Research (NINR) and Herzing IRB standards. Your manual must specify: (1) an explicit sampling design with inclusion/exclusion criteria and power analysis; (2) psychometric reliability (Cronbach's alpha) and validity metrics for all clinical data collection instruments; (3) parametric or non-parametric statistical testing protocols; (4) an itemized grant budget justification; and (5) a comprehensive Human Subjects Protection Plan addressing the Belmont Report principles (Respect for Persons, Beneficence, Justice), informed consent workflows, HIPAA data de-identification, and vulnerable population safeguards.

4.2 NSG 633 — Safety and Quality (3.00 Credits, 45 Contact Hours)

- Milestone 1: Sentinel Event Root Cause Analysis (RCA) & Fishbone/Ishikawa Diagnostic
    - Prompt Detail: Analyze a clinical sentinel event or near-miss scenario (such as a high-alert medication administration error or a postpartum hemorrhage delay). Construct an Ishikawa (Fishbone) diagram and execute a formal Root Cause Analysis (RCA) differentiating active human errors from latent systems failures within a Just Culture framework.
    - Twice the Detail: Grounded in Yoder-Wise and Sportsman (2023), Institute for Healthcare Improvement (IHI) patient safety standards, and The Joint Commission sentinel event mandates, you will lead an interprofessional Root Cause Analysis (RCA) team investigating a catastrophic clinical breakdown. You must construct a visual Ishikawa Fishbone Diagram categorizing contributing factors across six domains (Personnel, Equipment/Technology, Environment, Policies/Procedures, Communication/Handoffs, and Organizational Culture). Your accompanying 1,500-word systems audit must

reject punitive individual blame in favor of a Just Culture algorithm (distinguishing human error, at-risk behavior, and reckless behavior) and trace how latent staffing, EHR alert fatigue, and SBAR handoff failures allowed the error to penetrate Swiss Cheese defensive layers.

- Milestone 2: Continuous Quality Improvement (CQI) PDSA Cycle & NDNQI Benchmarking Plan
    - Prompt Detail: Design a Rapid-Cycle Plan-Do-Study-Act (PDSA) quality improvement initiative targeting a National Database of Nursing Quality Indicators (NDNQI) nurse-sensitive metric. Specify baseline benchmarks, smart aims, interprofessional workflow modifications, and fiscal return-on-investment (ROI) projections.
    - Twice the Detail: Acting as a Nursing Quality and Safety Director, you will author a comprehensive PDSA Performance Improvement Blueprint targeting a specific NDNQI nurse-sensitive indicator (e.g., Central Line-Associated Bloodstream Infections [CLABSI], inpatient falls with injury, or psychiatric restraint utilization). Your blueprint must include: (1) specific, measurable, achievable, relevant, and time-bound (SMART) outcome and process measures compared against national CMS Hospital Compare and NDNQI decile benchmarks; (2) a step-by-step Plan-Do-Study-Act (PDSA) implementation cycle with run-chart and control-chart statistical process control monitoring; (3) ethical and legal liability analyses under state Nurse Practice Acts; and (4) a fiscal cost-avoidance calculation demonstrating how preventing never-events protects hospital Value-Based Purchasing (VBP) reimbursement.

4.3 NU 725 — Technology and Nursing Informatics in Advanced Practice (3.00 Credits, 45 Contact Hours)

- Milestone 1: Clinical Information Systems & EHR Workflow Gap Analysis (DIKW Paradigm)
    - Prompt Detail: Perform an information technology workflow audit of a clinical practice setting using McGonigle and Mastrian's Data-Information-Knowledge-Wisdom (DIKW) framework. Evaluate electronic health record (EHR) usability, clinical decision support systems (CDSS), interoperability standards, and regulatory compliance under HIPAA and the HITECH/21st Century Cures Act.
    - Twice the Detail: Drawing on McGonigle and Mastrian (2022/2025) and Office of the National Coordinator for Health Information Technology (ONC) standards, you will conduct a granular Informatics Gap Analysis of an acute or ambulatory clinical setting. Your audit must map how raw patient clinical data transforms across the Data-Information-Knowledge-Wisdom (DIKW) hierarchy, evaluate nursing taxonomy integration (SNOMED-CT, LOINC, ICD-10, NANDA-I/NIC/NOC), diagnose EHR usability bottlenecks and CDSS alert fatigue using the Systems Development Life Cycle (SDLC), and audit cybersecurity, HIPAA Privacy/Security Rule safeguards, and HL7 FHIR interoperability compliance.
- Milestone 2: Strategic Health IT Selection, Implementation, & Telehealth Equity Rollout Plan
    - Prompt Detail: Develop a strategic planning manual to direct the selection, vendor evaluation, implementation, and outcome evaluation of a new health information or telehealth technology in your practice setting, addressing digital health disparities across vulnerable patient populations.
    - Twice the Detail: Operating as a Chief Nursing Informatics Officer (CNIO), you will author a comprehensive Strategic Health IT Implementation Manual for deploying a novel clinical technology (such as an AI-driven sepsis early-warning CDSS, barcode medication administration [BCMA] upgrade, or remote patient monitoring telehealth platform). Your manual must deliver: (1) a vendor Request for Proposal (RFP) scoring matrix and total cost of ownership (TCO) budget; (2) an SDLC phased rollout timeline (Planning, Analysis, Design,

Implementation, Evaluation/Maintenance) with super-user training workflows; (3) a Digital Health Equity & Accessibility Protocol addressing broadband gaps, health literacy, and ADA Section 508 sensory/assistive technology compliance; and (4) post-go-live KPI metrics measuring nursing documentation time reduction and medication error mitigation.

4.4 NU 730 — Systems-Based Practice (3.00 Credits, 45 Contact Hours)

- Milestone 1: Macro-, Meso-, & Microsystem Structural Audit & Healthcare Payment Model Analysis
  - Prompt Detail: Analyze the organizational architecture of a complex healthcare delivery system across macro-, meso-, and microsystem tiers. Evaluate how federal and state payment models (Fee-for-Service, DRGs, Medicare/Medicaid Value-Based Purchasing, ACOs, and bundled payments) impact clinical care delivery, cost management, and patient access.
  - Twice the Detail: Grounded in systems thinking, implementation science, and healthcare economics (**NU 730 Catalog**), you will author a 1,800-word structural and fiscal audit of a multi-tiered health system. You must map the interdependencies between the Macrosystem (federal CMS regulations, state scope-of-practice statutes, and payer markets), the Mesosystem (hospital executive governance, service-line leadership, and inter-departmental supply chains), and the Clinical Microsystem (frontline interdisciplinary care teams and patient-family dyads). Your analysis must contrast Fee-for-Service volume incentives against Prospective Payment Systems (MS-DRGs), Accountable Care Organizations (ACOs), and Value-Based Purchasing (VBP) penalties, demonstrating how reimbursement structures shape frontline nursing resource allocation.
- Milestone 2: Hoshin Kanri Strategic Planning Initiative for Health Equity & Structural Anti-Discrimination
  - Prompt Detail: Engage in a comprehensive strategic planning initiative for a complex healthcare system that enhances value, access, quality, and cost-effectiveness, incorporating explicit institutional policy reforms to advance health equity and eliminate structural discrimination.
  - Twice the Detail: Acting as a Vice President of Nursing and Systems Innovation, you will construct a complete Strategic Transformation & Health Equity Blueprint utilizing Hoshin Kanri (Policy Deployment) and balanced scorecard methodologies. Your blueprint must include: (1) an X-Matrix aligning breakthrough 3-to-5-year organizational objectives with annual meso/microsystem targets and financial KPIs; (2) an explicit Policy Examination for Structural Discrimination auditing institutional clinical algorithms, triage protocols, and language/disability access barriers against Section 1557 of the Affordable Care Act, Title VI of the Civil Rights Act, and Section 504 of the Rehabilitation Act; and (3) an implementation science rollout plan specifying change-management tactics, cost-effectiveness projections, and equity-stratified quality dashboards.

4.5 NU 780 — Population Health (3.00 Credits, 45 Contact Hours)

- Milestone 1: Epidemiological Community Health Needs Assessment (CHNA) & Social Determinants Audit
  - Prompt Detail: Select a target geographic or vulnerable population and conduct a comprehensive Epidemiological & Community Health Needs Assessment. Analyze morbidity, mortality, incidence/prevalence ratios, and Healthy People 2030 benchmarks across all five Social Determinants of Health (SDOH) domains.
  - Twice the Detail: Grounded in Stanhope and Lancaster (2024) (Public Health Nursing, 11th ed.) and CDC epidemiological frameworks (**NU 780 Course Guide**), you will compile an empirical Community Health Needs Assessment

(CHNA) for a defined county or vulnerable subpopulation. You must extract primary and secondary biostatistical indicators (crude and age-adjusted mortality rates, incidence, prevalence, relative risk, and odds ratios from County Health Rankings, CDC WONDER, and state behavioral risk surveys), map all five Healthy People 2030 Social Determinants of Health (SDOH) domains (Economic Stability, Education Access and Quality, Health Care Access and Quality, Neighborhood and Built Environment, and Social and Community Context), and prioritize the top three population health disparities using the Hanlon Method for Prioritizing Health Problems.

- Milestone 2: Cross-Sector Population Health Intervention, Policy Advocacy, & Emergency Preparedness Blueprint
  - Prompt Detail: Design a collaborative population health intervention for your selected community involving traditional and non-traditional partnerships (public health agencies, industry, academia, healthcare, and local government). Include primary/secondary/tertiary prevention levels, a legislative policy advocacy strategy, and a community disaster/emergency preparedness protocol.
  - Twice the Detail: This culminating blueprint of NU 780 requires designing an integrated, multi-sector Population Health & Emergency Preparedness Manual across the healthcare delivery continuum. Your manual must detail: (1) a coalition governance structure uniting traditional clinical partners (FQHCs, county health departments) with non-traditional community partners (housing authorities, faith-based networks, school districts, and food banks); (2) a three-tiered intervention matrix operationalizing Primary Prevention (immunization/environmental policy), Secondary Prevention (mobile screening/early detection), and Tertiary Prevention (chronic disease self-management and harm reduction) using the Minnesota Public Health Intervention Wheel; (3) a formal Legislative Policy Brief advocating for state or federal statutory/funding reform; and (4) an All-Hazards Disaster & Surge Preparedness Plan aligned with the FEMA National Incident Management System (NIMS) and Hospital Incident Command System (HICS) to protect medically fragile populations during public health emergencies.

SECTION 5: NURSING LEADERSHIP & GRADUATE MSN-DE FACULTY DIRECTORY

Per the **Herzing MSN-DE Program Page** and the official **Herzing University Graduate Faculty Listing**, the following academic deans, department chairs, and credentialed graduate nursing professors lead and instruct courses across the MSN-DE curriculum:

Faculty / Administrator Name	Institutional Title & Role	Earned Degrees & Granting Institutions	MSN-DE Curricular & Clinical Specialization
Dr. Stephanie Black, DNP, MSN, BSN, RN	Dean of Prelicensure Nursing	D.N.P. (Nursing Education), M.S.N., B.S.N. (**Herzing MSN-DE Page**)	Executive Dean overseeing the MSN-DE pathway, simulation-based learning, clinical intensives, and NCLEX-RN readiness.
Dr. Brandy Ebert, DNP, MBA, MS, BSN, BS	Professor & Department Chair — Graduate Nursing	D.N.P. (Nursing), American Sentinel Univ.; M.B.A., Keller; M.S. (Nursing Education), Chamberlain; B.S.N., Barnes-Jewish; B.S. (Biochemistry), Univ. of Missouri-Columbia (**Graduate Faculty PDF**)	Department Chair overseeing graduate nursing operations, NSG 520 pathophysiology/ biochemistry foundations, and NU 730 systems-based practice.

Faculty / Administrator Name	Institutional Title & Role	Earned Degrees & Granting Institutions	MSN-DE Curricular & Clinical Specialization
Dr. Paula Pitts, DNP, MSN, BSN	Professor & Department Chair — Graduate Nursing	D.N.P. (Nursing Practice), Chamberlain University; M.S.N., Walden University; B.S.N., University of Tennessee (**Graduate Faculty PDF**)	Department Chair overseeing MSN curriculum progression, clinical synthesis (NSG 631–632), and grade appeals.
Dr. Elicia Sutton, DNP, MSN, BSN, ASN	Professor & Department Chair — Graduate Nursing	D.N.P. (Nursing Practice) & B.S.N., Missouri State University; M.S.N. (FNP), Cox College; A.S.N., North Arkansas College (**Graduate Faculty PDF**)	Department Chair overseeing advanced clinical practice, family nursing (NSG 526), and preceptor compliance.
Dr. Christina Nelson, DNP, MSN, BSN	Adjunct Professor (Graduate Nursing)	D.N.P. (Nurse Practitioner), University of Massachusetts Global; M.S.N., B.S.N. (Nursing), Chamberlain College of Nursing (**Graduate Faculty PDF**)	Medical-Surgical Nursing (NSG 523, NSG 527) and adult health assessment (NSG 521).
Dr. Ginger King, DNP, MSN	Adjunct Professor (Graduate Nursing)	D.N.P. (Nursing), Grand Canyon University; M.S.N. (Patient Care Services), Chamberlain University (**Graduate Faculty PDF**)	Medical-Surgical Nursing (NSG 523, NSG 527), patient care coordination, and acute care clinicals (NSG 525, NSG 528).
Dr. Kristen Dickerson, PhD, MSN, BS	Professor (Full-Time Graduate Faculty)	Ph.D. (Public Health) & M.S.N. (Public Health Nursing), Walden University; B.S. (Microbiology), Ohio University (**Graduate Faculty PDF**)	NU 780 Population Health, NSG 660 Scholarly Practice, and SC 166 Microbiology foundations.
Dr. Brandi Wilford, DNP, MSN, BSN	Adjunct Professor (Graduate Nursing)	D.N.P., M.S.N. (Public Health Administration), University of South Alabama; B.S.N., University of Southern Mississippi (**Graduate Faculty PDF**)	NU 780 Population Health, community health epidemiology, and NU 730 Systems-Based Practice.
Dr. Dana Hunt, DNP, MSN, BSN	Adjunct Professor (Graduate Nursing)	D.N.P. (Educational Leadership), Case Western Reserve Univ.; M.S.N. (Nursing-Public Health), St. Louis Univ.; B.S.N., Barnes-Jewish (**Graduate Faculty PDF**)	NU 780 Population Health, NSG 631–632 Synthesis I & II, and nursing education.
Dr. Lisa Holcomb, DNP, MSN, BSN	Adjunct Professor (Graduate Nursing)	D.N.P. (Executive Leadership) & M.S.N. (Health Care Quality), The George Washington University; B.S.N., Mississippi Univ. for Women (**Graduate Faculty PDF**)	NSG 633 Safety and Quality, NU 730 Systems-Based Practice, and healthcare quality improvement.

Faculty / Administrator Name	Institutional Title & Role	Earned Degrees & Granting Institutions	MSN-DE Curricular & Clinical Specialization
Dr. Angela Owens, DNP, MSN, BSN	Adjunct Professor (Graduate Nursing)	D.N.P. (Healthcare Systems Leadership), Chamberlain University; M.S.N., University of Phoenix; B.S.N., Brenau University (**Graduate Faculty PDF**)	NU 730 Systems-Based Practice, NSG 633 Safety and Quality, and NU 725 Nursing Informatics.
Dr. Crystal Paunan, DNP, MSN	Adjunct Professor (Graduate Nursing)	D.N.P. (Healthcare Systems Leadership), Chamberlain University; M.S.N. (Clinical Leadership), Elmhurst College (**Graduate Faculty PDF**)	NU 730 Systems-Based Practice, NSG 633 Safety and Quality, and clinical leadership (NSG 621).
Dr. Paulette Jones, DNP, MSN, BSN	Adjunct Professor (Graduate Nursing)	D.N.P. (Nursing Practice), Aspen University; M.S.N. (Leadership in Health Care Systems), Grand Canyon University; B.S.N., Allen College (**Graduate Faculty PDF**)	NU 730 Systems-Based Practice, NU 725 Technology & Informatics, and NSG 633 Safety and Quality.
Dr. Becky Jordan, DNP, MSN, BSN	Adjunct Professor (Graduate Nursing)	D.N.P., M.S.N., B.S.N. (Mental Health), New York University (**Graduate Faculty PDF**)	NSG 524 Mental Health Nursing and NSG 525 Clinical II psychiatric rotations.
Dr. Jessica Collins, DNP, MSN, BSN	Adjunct Professor (Graduate Nursing)	D.N.P. (Psychiatric Mental Health) & M.S.N. (FNP), Chamberlain University; B.S.N., Ohio University (**Graduate Faculty PDF**)	NSG 524 Mental Health Nursing, NSG 526 Family Nursing, and psychopharmacology (NSG 520).
Dr. Dava McGougan, DNP, MSN	Adjunct Professor (Graduate Nursing)	D.N.P. (Psychiatric Mental Health), University of Missouri-Columbia; M.S.N. (FNP), Maryville University (**Graduate Faculty PDF**)	NSG 524 Mental Health Nursing and NSG 526 Family Nursing across the lifespan.
Dr. Heather Denlinger, DNP, MSN, BSN	Professor (Full-Time Graduate Nursing)	D.N.P., Jacksonville Univ.; M.S.N. (Nurse-Midwifery), Frontier School of Midwifery & Family Nursing; B.S.N., Villa Julia College (**Graduate Faculty PDF**)	NSG 526 Family Nursing (Maternal-Newborn & Women's Health) and NSG 528 Clinical III.
Dr. Cozetta Bagley, DNP, BSN	Professor (Full-Time Graduate Nursing)	D.N.P. (Nursing), Case Western Reserve University; B.S.N., Southwest Baptist University (**Graduate Faculty PDF**)	NSG 520 Pathophysiology & Pharmacology, NSG 521 Health Assessment, and NSG 660 Scholarly Practice.

Faculty / Administrator Name	Institutional Title & Role	Earned Degrees & Granting Institutions	MSN-DE Curricular & Clinical Specialization
Dr. Hope Bauman, DNP, MSN, BSN	Professor (Full-Time Graduate Nursing)	D.N.P., M.S.N. (Nursing), University of Nebraska Medical Center; B.S.N., Creighton University (**Graduate Faculty PDF**)	NSG 523 Medical-Surgical Nursing I, NSG 527 Medical-Surgical Nursing II, and NSG 635 Integration of Concepts.
Dr. Jacqueline Rhoads, PhD, MSN, BSN	Professor (Full-Time Graduate Nursing)	Ph.D. (Nursing), University of Texas; M.S.N., Texas Woman's University; B.S.N., University of the Incarnate Word (**Graduate Faculty PDF**)	NSG 660 Scholarly Practice, NSG 631–632 Synthesis I & II research methodology, and NSG 520 Pathophysiology.

SECTION 6: COMPREHENSIVE WEB CRAWL FINDINGS — MSN-DE STUDENT REPOSITORIES, SYLLABI, & EXAM BANKS

Unlike the MS-HHSL courses (HH 620 and HH 630), which have zero proctored tests, the prelicensure clinical and didactic courses in Herzing University's MSN-DE program heavily utilize standardized HESI exams, Elsevier Adaptive Quizzing (EAQ), and RealizeIt/Sherpath modules. Consequently, our comprehensive web crawl across Docsity, Stuvia, ACEMAPP, RNStudentResources, Herzing Tutors, and Knack uncovered hundreds of direct, course-code-tagged student study guides, exam banks, and official clinical syllabi:

Platform & Verified Resource Title	MSN-DE Course Code & Scope	Student-Posted Content & Study Utility
ACEMAPP Official Herzing Clinical Hub — NSG 525 Clinical II Complete Syllabus (**NSG 522**, **NSG 621**)	NSG 522, NSG 525, NSG 528, NSG 621 (Clinical I–IV)	Official Michigan Health Council ACEMAPP clinical collaboration portal hosting Herzing University Online's verbatim 16-unit clinical syllabi, vSim/DocuCare weights (400 pts), reflection rubrics (350 pts), and care plan guidelines (100 pts).
ACEMAPP Official PDF — NSG 631 Synthesis I Complete Course Syllabus (**Portal Page**)	NSG 631 (Synthesis I — Capstone Part 1)	Verbatim 4-page official Herzing syllabus detailing all 8 units, PICOT question forum, Mentor Agreement Form, Literature Review Matrix (150 pts), Strategy & Methods Paper (150 pts), and Literature Review Paper (150 pts).
Docsity — Herzing University NSG 520 Pathophysiology & Pharmacology Final Exam Prep (2026/2027) (**Module 2 RealizeIt**)	NSG 520 (Pathophysiology & Pharmacology)	Student-uploaded MSN-DE exam prep, HESI Pathophysiology practice questions, cellular alteration rationales (e.g., apoptosis, fluid/electrolyte shifts), and RealizeIt/Sherpath module test banks (**Midterm Guide**).

Platform & Verified Resource Title	MSN-DE Course Code & Scope	Student-Posted Content & Study Utility
Docsity — Herzing NSG 521 Fundamentals & Health Assessment Exam 3 (200-Question Practice Bank) (**2026/2027 Exam 3 Q&A**)	NSG 521 (Fundamental Concepts & Health Assessment)	Comprehensive 200-question student practice bank and verified clinical assessment solutions covering physical exam techniques (inspection, palpation, percussion, auscultation) and nursing process fundamentals (**Clinical Study Q&A**).
Stuvia — Herzing University NSG 523 Medical-Surgical Nursing I Notes & HESI Study Repository (**Docsity 100-Q Exam**)	NSG 523 (Medical-Surgical Nursing I)	Dedicated Herzing NSG 523 student note hub on Stuvia and 100-question verified Med-Surg I HESI exam paper on Docsity covering respiratory, GI, cardiovascular, renal, endocrine, and neurologic units (**RNStudentResources 146-Page Guide**).
Docsity — NSG 524 Mental Health Nursing Exams 1, 2, & Final NGN (2026/2027 Actual Q&A) (**Stuvia NSG 524 Hub**)	NSG 524 (Mental Health Nursing)	Student-shared Next Generation NCLEX (NGN) case questions, psychopharmacology tables, therapeutic communication rationales, and Exam 1 / Final Exam reviews (**Final Exam V2**).
Stuvia — NSG 526 Family Nursing Exam 1 & Exam 2 NGN Study Guides (Herzing University) (**Docsity 50-Q Practice**)	NSG 526 (Family Nursing — OB & Pediatrics)	Student-uploaded NCLEX/NGN-style practice questions and rationales covering antepartum/intrapartum/postpartum care, high-risk newborns, and pediatric developmental milestones (**Exam 1 Bundle**).
Herzing Tutors — Graduate DNP-Bridge Course Guides: NU 725, NU 730, & NU 780 (**NU 725 Guide**, **NU 730 Guide**)	NU 725, NU 730, & NU 780 (Informatics, Systems Practice, Population Health)	Detailed syllabus cadence guides, rubric requirement ledgers, quality control checklists, and cross-program mapping across the 30 Herzing MSN/DNP tracks that share NU 725, NU 730, and NU 780 (**Stuvia Nursing Hub**).
Docsity — Herzing University Nursing Exam & Handout Repository (73+ Pages of Uploads) (**Knack NSG 523 Peer Tutors**)	All MSN-DE Courses & HESI Exit Prep	Comprehensive university index of student-uploaded HESI Health Assessment, Med-Surg I & II, Pharmacology, and RN Exit Exam practice sets, alongside peer tutoring profiles on Knack for NSG 523 and Dosage Calculation Exam prep.

SECTION 7: MSN-DE INSTITUTIONAL GRADING SCALE, HESI CONVERSION CHART, PROGRESSION MILESTONES, & CLINICAL POLICIES

Per the **Herzing University Graduate Catalog** and the **MSN-DE Official Program Outline**, graduate nursing students in the MSN-DE program are subject to heightened progression, testing, and clinical compliance standards:

7.1 Graduate Nursing Grading Scale (Strict 80.00% "B" Passing Floor)

Unlike non-nursing graduate programs at Herzing (which award a passing "C" for 70.00–79.99%), all graduate nursing courses (**NSG** and **NU** prefixes) enforce an 80.00% ("B") minimum passing threshold, with no "C" grade existing on the Nursing Graduate Grading Scale (**Herzing Graduate Catalog**):

Letter Grade	Percentage Range	Quality Points	MSN-DE Progression & Repeat Policy Impact
A	90.00% – 100.00%	4.00	Superior graduate nursing proficiency; meets all progression standards.
B	80.00% – 89.99%	3.00	Minimum passing benchmark required in every NSG and NU course (SC 154 and SC 254 also require >=80%).
F	0.00% – 79.99%	0.00	Failure; awards zero credit. Nursing students may not repeat any nursing course more than once (maximum 2 attempts per course). Failing two (2) nursing courses results in automatic dismissal from the nursing program, even if cumulative PGPA >= 3.00.
I	Incomplete	N/A	Must be requested by the last day of the grading period and resolved within two class weeks of the next academic term (or converts to "F").
W	Withdrawal	N/A	Issued for withdrawals prior to the 75% point of the course; counts as attempted credits in SAP pace (minimum 66.67% pace required).

7.2 Standardized HESI Exam Score Conversion Chart & Grade Weighting

In core clinical-didactic MSN-DE courses (such as NSG 523 and NSG 526), proctored HESI Unit Exams (40%) and the HESI Final Exam (40%) account for 80% of the total course grade, while Sherpath EAQ Quizzes account for 10%, Sherpath Interactive Lessons and Discussions account for 5%, and HESI Remediation Packets / Personalized Learning Plans account for 5%. Raw HESI scores are converted to course gradebook percentages using the official Herzing HESI Conversion Chart:

HESI Standardized Score Interval	Official Course Gradebook Percentage	Equivalent Letter Grade Tier
>= 1100	100%	Grade A (Exemplary Proficiency)
1050 – 1099	95%	Grade A (High Proficiency)
1000 – 1049	90%	Grade A (Recommended Benchmark)
950 – 999	85%	Grade B (Acceptable Proficiency)
900 – 949	82%	Grade B (Minimum Target Zone)
875 – 899	80%	Grade B (Minimum Passing Cutoff — 80%)
850 – 874	78%	Grade F (Below 80% Nursing Passing Floor)
800 – 849	75%	Grade F (Requires Remediation)
750 – 799	71%	Grade F (Requires Remediation)

HESI Standardized Score Interval	Official Course Gradebook Percentage	Equivalent Letter Grade Tier
700 – 749	67%	Grade F (Requires Remediation)
600 – 699	59%	Grade F (High-Risk Deficit)
500 – 599	50%	Grade F (High-Risk Deficit)
400 – 499	41%	Grade F (Severe Deficit)
< 400	32%	Grade F (Severe Deficit)

7.3 MSN-DE Curriculum Progression Milestone Exams, RN Exit Exam, & Dosage Calculation Gates

Per the **MSN-DE Official Program Outline, students must pass four standardized progression gates and recurring Dosage Calculation Exams**:

- Progression Milestone Exam #1: Administered after or while completing NSG 520, NSG 521, and NSG 522.
- Progression Milestone Exam #2: Administered after or while completing NSG 526, NSG 527, and NSG 528.
- Progression Milestone Exam #3 (Pharmacology Exam): Administered during the semester prior to NSG 632 and NSG 635.
    - Milestone Remediation & Dismissal Rule: If the benchmark score is not achieved on Attempt 1, the student collaborates with faculty/NCLEX coach on a remediation plan for Attempt 2. If Attempt 2 falls below benchmark, the student is blocked from enrolling in next-semester clinical courses and placed into an 8-week nursing remediation course with one final retake attempt. Unsuccessful completion of the final retake results in dismissal from the nursing program and advisement into alternative pathways (such as the MS in Health and Human Services Leadership) (**MSN-DE Official Program Outline**).
- RN Exit Exam (**NSG 635** Integration of Concepts): Covers content from all nursing courses to validate NCLEX-RN readiness. Failure to reach the exit benchmark results in an Incomplete (I) grade in NSG 635, requiring resolution by Week 2 of the subsequent semester or conversion to an F grade and placement on an "Approved Break" for formal remediation.
- Dosage Calculation Exams (e.g., Dosage Calculation Exam 04 in **NSG 523**): Students have two (2) opportunities to score 80% or higher. Failure on Attempt 1 mandates structured remediation using Calculate with Confidence and SASC tutoring; failure on Attempt 2 blocks progression into subsequent clinical/medical-surgical courses (such as NSG 527).

7.4 Clinical Practicum Attendance, Non-Transferability, & Remote Proctoring Policies

- Strict Clinical Attendance & Concurrent Repeat Rule: Students must attend 100% of assigned clinical practicum hours (585.00 total hours). Failure to attend any portion of a clinical assignment without prior instructor approval results in a Clinical Failure ("F") for the entire course, requiring repetition of all didactic, lab, and clinical components concurrently (**Herzing Graduate Catalog**).
- Zero Clinical Practicum Transfer Rule: Per the **Herzing Graduate Catalog Nursing Transfer Credit Policy**, nursing students may not transfer credits or hours obtained in clinically based practicum courses; up to 12.00 semester credits of non-clinical graduate coursework (earned with a "B-" or higher within 5 years) may be transferred, and all MSN-DE requirements must be completed within a five (5) year maximum window.
- Remote Proctoring & ADA/Section 504 Testing Accommodations: Standardized nursing exams utilize third-party remote proctoring software (such as ProctorU / Meazure Learning or Proctorio) with webcam, microphone, browser lockdown, and

gaze/audio monitoring. Students with documented disabilities under Section 504 of the Rehabilitation Act and Title III of the Americans with Disabilities Act (ADA) must coordinate approved testing modifications (such as extended testing time, distraction-reduced private testing environments, and verbal processing allowances) through the University ADA/Title IX Coordinator prior to exam administration (**Herzing Graduate Catalog**).

ACCESSIBILITY NAVIGATION: [↑ Cover & Disclaimer] · [↑ Table of Contents] · [↑ Case & Ticket Sheet] · [↑ Updated CV & SNHU Audit] · [↑ Angie MP4 & Transcript] · [↑ Gemini Podcast & Transcript] · [↑ Sarah Millard & Emails Addendum] · [Vol I] · [Vol II] · [Vol III] · [Vol IV] · [Vol V] · [Vol VI] · [Vol VII] · [Vol VIII] · [Vol IX] · [Vol X] · [↓ Table of Cases (Chronological)] · [↓ Table of Statutes] · [↓ Legal & Clinical Glossary] · [↓ Reference Registry] · [↓ Complete Index]

CWRIGHT26 COMPLETE COMPENDIUM · VOLUME III

VOLUME III: MSN-DE to BSHHS Programmatic Comparison, 31-to-40 Credit Transfer Evaluation & Competency Crosswalk

HERZING UNIVERSITY — COMPREHENSIVE PROGRAM COMPARISON: MSN-DE VS. MS IN HEALTH AND HUMAN SERVICES LEADERSHIP (MS-HHSL)

Institution: **Herzing University** — Online Division (Madison, Wisconsin Main Campus Association; Administrative Offices: 275 W. Wisconsin Ave., Ste. 210, Milwaukee, WI 53203)

Programs Compared:

- Program A: **Master of Science in Nursing – Direct Entry (MSN-DE / DEMSN)** (**Official MSN-DE Course Sheet PDF**)
- Program B: **Master of Science in Health and Human Services Leadership (MS-HHSL / MS-HHS)** (**HH 620 Catalog Preview**)

Catalog & Policy Authority: **Herzing University Graduate Catalog (Academic Information & Policies)**

SECTION 1: EXECUTIVE SIDE-BY-SIDE MASTER PARAMETER COMPARISON

Comparison Dimension	Master of Science in Nursing – Direct Entry (MSN-DE)	Master of Science in Health and Human Services Leadership (MS-HHSL)	Net Structural & Operational Contrast
degree awarded & Program Focus	Master of Science in Nursing (MSN) — Prelicensure RN generalist preparation + DNP dual-credit core (**Herzing MSN-DE**)	Master of Science in Health and Human Services Leadership (MS) — Executive, agency, and multidisciplinary team leadership (**Herzing MS-HHSL**)	Clinical Bedside & Licensure Prep vs. Executive Systems, Policy, & Program Leadership
Institutional & Programmatic Accreditation	Higher Learning Commission (**HLC**) + Commission on Collegiate Nursing Education (**CCNE**)	Higher Learning Commission (**HLC**)	Both hold full regional HLC accreditation; MSN-DE adds CCNE clinical nursing accreditation.
Total Required Semester Credits	77.00 Credits Total (60.00 Graduate Nursing Credits + 17.00 Prerequisite Science/Math Credits) (**Herzing MSN-DE**)	31.00 Credits Total (10 required graduate courses; zero prerequisite credits) (**Herzing MS-HHSL**)	MS-HHSL requires 46.00 fewer total credits (-59.7%) than full MSN-DE (and 29.00 fewer credits than the 60-credit nursing core).
Total Required Courses	23 Courses Total (5 Prerequisite Courses + 18 Graduate Nursing/ Clinical Courses)	10 Courses Total (7 HH Courses + 3 MSW Courses)	13 fewer total courses in MS-HHSL.
Standard Time to Completion (Full-Time)	20–24 Months (5 to 6 sixteen-week semesters) (**Herzing MSN-DE**)	12 Months (3 sixteen-week semesters / six 8-week modular sessions) (**Herzing MS-HHSL**)	MS-HHSL completes in half the standard calendar duration (and in 2 modular sessions / May 2027 with 21 equivalency/transfer credits).

Comparison Dimension	Master of Science in Nursing – Direct Entry (MSN-DE)	Master of Science in Health and Human Services Leadership (MS-HHSL)	Net Structural & Operational Contrast
Total Contact Hours	1,620.00 Contact Hours (885.00 Lecture / 150.00 Lab / 585.00 Clinical Practicum) (**Herzing MSN-DE**)	465.00 Contact Hours (465.00 Lecture / 0.00 Lab / 0.00 Clinical Practicum) (**Herzing MS-HHSL**)	MS-HHSL eliminates 1,155.00 contact hours (including all 585 clinical hours and 150 lab hours).
On-Campus Intensive & Travel Mandate	3 Mandatory On-Campus Intensives (2–4 days each in Brookfield, WI or Nashville, TN; or Kenosha, WI hybrid labs) + 585 Clinical Hours within 100+ mile radius	Zero On-Campus Intensives, Zero Labs, Zero Fieldwork/ Clinicals (100% Online Asynchronous)	Eliminates all out-of-state travel, lodging expenses, and clinical site commuting.
Testing & Surveillance Architecture	High-Stakes Remote Webcam Proctoring (ProctorU/Meazure/ Proctorio; 40% HESI Unit Exams + 40% HESI Final Exam = 80% of course grade; 3 HESI Milestone Exams; RN Exit Exam; 80% Dosage Calculation gates; 58–135 Sherpath/EAQ modules per course)	100% Native Canvas Applied Assessments (Written strategic plans, SWOT/PESTLE audits, organizational charts, ethical briefs, budgets, and evaluation matrices; Zero webcam proctoring, Zero HESI, Zero Sherpath/EAQ)	Eliminates third-party webcam surveillance, proctor lockouts, sensory trauma, and mechanical digital busywork.
Graduate Grading Scale & Passing Floor	Nursing Scale: A (90–100%), B (80–89.99%), F (0–79.99%) — No "C" grade exists; <80.00% is automatic Failure (**Herzing Catalog**)	Standard Graduate Scale: A (90–100%), B (80–89.99%), C (70–79.99% = 2.00 pts, Passing), F (0–69.99%) (**Herzing Catalog**)	MS-HHSL awards course credit for 70–79.99% ("C") provided cumulative PGPA remains >= 3.00.
Course Repeat & Dismissal Rules	Maximum 2 attempts per nursing course; failing 2 nursing courses triggers automatic program dismissal regardless of GPA (**Herzing Catalog**)	Governed by standard Graduate SAP (3.00 PGPA and 66.67% pace evaluated at semester end; no automatic two-course failure dismissal)	Removes the punitive two-failure cliff while maintaining rigorous 3.00 graduate GPA standards.
Maximum Program Completion Window	5 Years from matriculation (**Herzing Catalog**)	7 Years from matriculation (**Herzing Catalog**)	MS-HHSL provides an additional 2 years of statutory completion flexibility.

SECTION 2: ADMISSIONS, PREREQUISITES, & COMPLIANCE REQUIREMENTS COMPARISON

Requirement Category	MSN-DE (Direct Entry Nursing)	MS-HHSL (Health and Human Services Leadership)	Comparative Impact
Prior Degree Requirement	Non-nursing Bachelor's or Graduate degree from an accredited institution (**Herzing MSN-DE**)	Any Bachelor's or Graduate degree from an accredited institution (no background in human services required) (**Herzing MS-HHSL**)	Both welcome career-changers with non-field undergraduate degrees.
Minimum Entry GPA	3.00 Cumulative GPA required	Standard graduate admission review with Herzing Advisor; no rigid 3.00 cutoff barrier	Greater admission flexibility in MS-HHSL.
Standardized Entrance Exam	TEAS Exam Required (Minimum 66% aggregate score; 78%+ for scholarship) (**Herzing MSN-DE**)	None (No GRE, GMAT, or TEAS required) (**Herzing MS-HHSL**)	No entrance testing barrier in MS-HHSL.

Requirement Category	MSN-DE (Direct Entry Nursing)	MS-HHSL (Health and Human Services Leadership)	Comparative Impact
Undergraduate Science & Math Prerequisites	17.00 Credits Required Prior to Nursing Core: MA 320 Statistics (3 cr, >=70%), SC 154 A&P I (4 cr, >=80% B), SC 254 A&P II (4 cr, >=80% B), SC 166 Microbiology (3 cr, >=70%), SC 186 Chemistry (3 cr, >=70%)	None (0.00 Prerequisite Credits)	Eliminates 17.00 credits (315 contact hours) of prerequisite coursework.
Clinical & Regulatory Onboarding	Physical exam, TB screening, immunization titers, AHA BLS Provider CPR certification, 10-panel drug screening, federal/state fingerprint background checks (IdentoGo/State BON), and CR 021 Clinical Readiness (**Herzing Catalog**)	None (100% online non-clinical curriculum)	Eliminates invasive medical/drug/ fingerprint clearances and clinical onboarding delays.
Geographic State Enrollment Restrictions	Restricted to 26 eligible states; 10 states currently paused at full capacity (AL, GA, HI, ID, IA, KS, MD, NV, OK, SD) plus metro-radius limits in CO, LA, and TX (**Herzing MSN-DE**)	Open Enrollment in All 50 U.S. States, District of Columbia, and U.S. Virgin Islands (**Herzing MS-HHSL**)	Nationwide portability without state Board of Nursing or clinical radius restrictions.

SECTION 3: TIME TO COMPLETION, CONTACT HOURS, & HOURS OF STUDY ANALYSIS

3.1 Institutional Credit Hour & Study Load Formulas

Per the **Herzing University Graduate Catalog Credit Hour & Method of Instruction Policies**:

- Online Engagement Rule: Each 1.00 semester credit hour in an online course requires a minimum of 45.00 hours of combined interaction with faculty, peers, and course content.
- Weekly Study Time Formula: Online graduate students are expected to spend a minimum of 6.00 hours per week per semester credit hour over a standard 7.5-to-8-week session (i.e., 18.00–22.50 hours/week for a 3-to-4-credit course, or 36.00+ hours/week when enrolled in 6.00 credits per 8-week session).
- Laboratory & Clinical Formulas: 1.00 lab credit requires 30.00 supervised lab hours plus 15.00 outside study hours (45.00 hours total); 1.00 clinical practicum credit requires 45.00 direct clinical hours on-site.

3.2 Quantitative Study Hours, Contact Hours, & Workload Comparison Table

Workload & Time Metric	MSN-DE (Full 77-Credit Track)	MSN-DE (60-Credit Nursing Core Only)	MS-HHSL (Full 31-Credit Track)	MS-HHSL (Chavon Wright 10-Credit Completion Pathway)
Total Semester Credit Hours	77.00 Credits	60.00 Credits	31.00 Credits	10.00 Remaining Credits (21.00 Credits Satisfied via Equivalency/ Transfer)
Didactic Lecture Contact Hours	885.00 Hours	690.00 Hours	465.00 Hours	150.00 Hours (HH 620 [45] + HH 630 [60] + HH 690 [45])
Laboratory Contact Hours	150.00 Hours (SC labs + NSG 522)	30.00 Hours (NSG 522)	0.00 Hours	0.00 Hours
Clinical Practicum Contact Hours	585.00 Hours (NSG 522, 525, 528, 621, 631, 632)	585.00 Hours	0.00 Hours	0.00 Hours

Workload & Time Metric	MSN-DE (Full 77-Credit Track)	MSN-DE (60-Credit Nursing Core Only)	MS-HHSL (Full 31-Credit Track)	MS-HHSL (Chavon Wright 10-Credit Completion Pathway)
Total Direct Contact Hours	1,620.00 Hours	1,305.00 Hours	465.00 Hours	150.00 Hours
Total Academic Engagement & Study Hours (45 Hrs / Credit)	3,465.00 Hours	2,700.00 Hours	1,395.00 Hours	450.00 Hours (Across Fall 2026 Session B & Spring 2027 Session A/B)
Weekly Study & Clinical Time Commitment	35.0 to 45.0+ Hours/ Week (Didactic Sherpath/EAQ modules + 8-to-12-hour clinical shifts + clinical commuting)	33.0 to 42.0+ Hours/Week	17.0 to 34.0 Hours/ Week (Depending on 1 vs. 2 courses per 8-week session)	16.88 Hours/Week in Fall B (HH 620, 3 cr) and 22.50–39.38 Hours/Week in Spring (HH 630 [4 cr] + HH 690 [3 cr])
Digital Platform Busywork Load	58 to 135+ Graded Sherpath/EAQ Items per Course (50–80 mins per module/50-Q EAQ quiz) + vSim + DocuCare	800+ Graded Digital Modules/ Quizzes across curriculum	Zero Sherpath/EAQ Modules; 1 weekly discussion + 4–5 scaffolded written milestones per course	Zero Sherpath/EAQ Modules; ~13 total major applied milestones across HH 620, HH 630, and HH 690
Target Graduation Timeline	24 Months (6 Semesters)	20 Months (5 Semesters)	12 Months (3 Semesters)	May 2027 Conferral (2 Modular 8-Week Terms Remaining)

SECTION 4: INDIVIDUAL COURSE-BY-COURSE COMPARISON & 1:1 EQUIVALENCY MAPPING

4.1 Direct Curricular Equivalency Matrix (MSN-DE / SNHU Coursework → MS-HHSL Requirements)

As established in the official catalog descriptions (**Herzing MS-HHSL**, **Herzing MSN-DE**) and the student's degree audit, seven completed graduate courses (21.00 credits) in the MSN-DE and SNHU record directly satisfy seven of the ten required MS-HHSL courses, leaving only three courses (10.00 credits):

MS-HHSL Required Course (31.00 Credits Total)	MS-HHSL Verbatim Catalog Scope	Matched MSN-DE / Graduate Course & Grade Earned	MSN-DE / Transfer Course Scope & Competency Alignment	Audit & Registration Status
HH 500: Foundations of Health and Human Services Management (3.00 cr, 45 hrs)	Historical evolution, ethical foundations, community resources, state/federal laws, and service delivery across disciplines (**Herzing MS-HHSL**).	NU 780: Population Health (3.00 cr, 45 hrs — Grade B [3.0], Herzing Term 2253B18)	Healthcare delivery continuum, public health prevention, SDOH, community partnerships, policy, and advocacy (**Herzing MSN-DE**).	Satisfied (Internal Graduate Equivalent — 3.00 Cr)
HH 510: Inquiry and Information Literacy (3.00 cr, 45 hrs)	Research methods, technology tools, ethical human subject standards, evidence-based advocacy, and emerging trends (**Herzing MS-HHSL**).	NSG 660: Scholarly Practice (3.00 cr, 45 hrs — Grade A [4.0], Herzing Term 2252A18)	Quantitative/ qualitative research appraisal, EBP, outcome evaluation, grant writing, and IRB human subject protection (**Herzing MSN-DE**).	Satisfied (Internal Graduate Equivalent — 3.00 Cr)

MS-HHSL Required Course (31.00 Credits Total)	MS-HHSL Verbatim Catalog Scope	Matched MSN-DE / Graduate Course & Grade Earned	MSN-DE / Transfer Course Scope & Competency Alignment	Audit & Registration Status
HH 600: Communication in Health and Human Services (3.00 cr, 45 hrs)	Communication theories, accessible strategies for diverse populations, public health channels, cultural intelligence, and health literacy (**Herzing MS-HHSL**).	NU 730: Systems-Based Practice (3.00 cr, 45 hrs — Grade B [3.0, 81.27%], Herzing)	Macro/meso/ microsystems communication, change theory, implementation science, Hoshin Kanri planning, and health equity policy (**Herzing MSN-DE**).	Satisfied (Internal Graduate Equivalent — 3.00 Cr)
HH 610: Planning and Fiscal Management (3.00 cr, 45 hrs)	Financial tools, operational budgets, reporting/logging practices, stakeholder communication, and grant evaluation (**Herzing MS-HHSL**).	NU 725: Technology and Nursing Informatics in Advanced Practice (3.00 cr, 45 hrs — Grade B [3.0], Herzing Term 2253A18)	Information systems, data governance, strategic IT planning, resource selection, and regulatory/fiscal efficiency (**Herzing MSN-DE**).	Satisfied (Internal Graduate Equivalent — 3.00 Cr)
MSW 510: Perspectives on Diversity and Global Society (3.00 cr, 45 hrs)	Ecological and social justice theories, DEI, structural discrimination, cultural humility, and intersectionality (**Herzing MS-HHSL**).	NSG 524: Mental Health Nursing (Grade A [4.0], Herzing) / PSY 545: Forensic Psychology (Grade A [4.0], SNHU)	Biopsychosocial theories, therapeutic communication, cultural diversity, and mental health interventions across diverse populations.	Satisfied (Internal Equivalent / Accredited Transfer — 3.00 Cr)
MSW 521: Generalist Practice with Organizations/ Community (3.00 cr, 45 hrs)	Direct theories/ interventions for groups and communities, supervision/ management impacts on client outcomes, and macro ethics (**Herzing MS-HHSL**).	NSG 633: Safety and Quality (3.00 cr, 45 hrs — Grade A [4.0], Herzing Term 2251A18)	Organizational systems perspective, leadership, motivation, strategic planning, fiscal responsibility, legal/ ethical issues, and CQI (**Herzing MSN-DE**).	Satisfied (Internal Graduate Equivalent — 3.00 Cr)
MSW 540: Social Policy and Services (3.00 cr, 45 hrs)	Federal, state, and local social policy analysis, advocacy, and development across healthcare, mental health, and justice systems (**Herzing MS-HHSL**).	PSY 624: Intersection of Law and Psychology (3.00 cr — Grade A [4.0], SNHU Graduate Transfer)	Constitutional standards, mental health jurisprudence, statutory compliance, and policy analysis across legal and behavioral systems.	Satisfied (Accredited Graduate Transfer — 3.00 Cr)
HH 620: Leadership and Multidisciplinary Teams (3.00 cr, 45 hrs)	Leadership styles (Northouse, 2021), multidisciplinary network management (Lynch, 2015), change monitoring (Kotter, 2012), and burnout prevention (Maslach & Leiter, 2016) (**HH 620 Catalog**).	Replaces Prelicensure Clinical Management & *NSG 621* Clinical IV	Shifts focus from hospital shift delegation to executive multidisciplinary network governance and workforce retention.	Scheduled: Fall 2026 Session B (Nov 2, 2026 — 3.00 Cr)
HH 630: Strategic Planning and Program Evaluation (4.00 cr, 60 hrs)	PESTLE/SWOT audits, organizational hierarchy flows, ethical rationing matrices, 12-month rollout manuals, and CQI evaluation systems (Bryson & George, 2024; Linfield & Posavac, 2018).	Replaces Prelicensure Acute Med-Surg (*NSG 523/527*) & *NSG 635* Exit Exam	Shifts focus from bedside acute care and HESI testing to executive strategic planning and empirical program evaluation.	Scheduled: Spring 2027 Session A/B (4.00 Cr)

MS-HHSL Required Course (31.00 Credits Total)	MS-HHSL Verbatim Catalog Scope	Matched MSN-DE / Graduate Course & Grade Earned	MSN-DE / Transfer Course Scope & Competency Alignment	Audit & Registration Status
HH 690: Capstone (3.00 cr, 45 hrs)	Culminating real-world project or simulation demonstrating application, analysis, integration, and evaluation (**Herzing MS-HHSL**).	Replaces *NSG 631* Synthesis I (3 cr) & *NSG 632* Synthesis II (3 cr)	Consolidates a 2-course, 6-credit, 135-clinical-hour nursing capstone into a single 3-credit, 100% online capstone (SAEF Project).	Scheduled: Spring 2027 Session A (3.00 Cr — May 2027 Conferral)

4.2 MSN-DE Courses Eliminated by Transitioning to MS-HHSL

By transitioning from the MSN-DE pathway to the MS-HHSL pathway, the student is relieved of the following prelicensure clinical, laboratory, and HESI-proctored courses (which cannot be transferred as clinical hours under Herzing catalog rules, even when already passed):

- Completed Prelicensure Science & Clinical Courses Retained on Transcript (19.00 Earned Credits with 4.00 Science GPA): SC 154 Anatomy & Physiology I (4.00 cr, Grade A), SC 254 Anatomy & Physiology II (4.00 cr, Grade A), NSG 520 Pathophysiology & Pharmacology (4.00 cr, Grade B), NSG 521 Fundamental Concepts & Health Assessment (5.00 cr, Grade B), NSG 522 Clinical I (2.00 cr, Grade A), and NSG 525 Clinical II (3.00 cr, Grade A).
- Uncompleted / Contested MSN-DE Prelicensure Courses Completely Bypassed (26.00 Credits & 405.00 Clinical Hours Avoided):
    - NSG 523: Medical Surgical Nursing I (4.00 cr, 60 lecture hrs — contested third-party proctoring/Sherpath course)
    - NSG 526: Family Nursing (4.00 cr, 60 lecture hrs, 135 Sherpath lessons + 3 HESI exams)
    - NSG 527: Medical Surgical Nursing II (5.00 cr, 75 lecture hrs + HESI exams)
    - NSG 528: Clinical III — OB, Pediatrics, & Advanced Med-Surg (3.00 cr, 135.00 clinical hours)
    - NSG 621: Clinical IV — Advanced Preceptorship (3.00 cr, 135.00 clinical hours + Progression Milestone Exam #3)
    - NSG 631: Synthesis I (3.00 cr, 30 lecture hrs + 45.00 clinical hours)
    - NSG 632: Synthesis II (3.00 cr, 15 lecture hrs + 90.00 clinical hours)
    - NSG 635: Integration of Concepts (3.00 cr, 45 lecture hrs + High-Stakes HESI RN Exit Exam)

SECTION 5: TUITION, FEES, & TOTAL FINANCIAL INVESTMENT COMPARISON

All figures below are sourced directly from the official 2026–2027 Tuition Wizards on the **Herzing MSN-DE Page** and the **Herzing MS-HHSL Page**:

Financial Metric	MSN-DE (Base 77-Credit Cost)	MSN-DE (With 17 Prerequisite Transfers = 60 Credits)	MS-HHSL (Base 31-Credit Cost)	MS-HHSL (With 12 Catalog Transfers = 19 Credits)	MS-HHSL (With 21 Equivalency/ Transfer Credits = 10 Remaining Credits)
Tuition Rate per Credit	$790.00 / credit	$790.00 / credit	$630.00 / credit	$630.00 / credit	$630.00 / credit (-$160.00/cr vs. MSN-DE)
Gross Base Tuition	$60,830.00 (77 x $790)	$60,830.00	$19,530.00 (31 x $630)	$19,530.00	$19,530.00
Transfer / Equivalency Tuition Savings	$0.00	-$13,430.00 (17 x $790)	$0.00	-$7,560.00 (12 x $630)	-$13,230.00 (21 x $630)
Net Tuition Charged	$60,830.00	$47,400.00	$19,530.00	$11,970.00	$6,300.00 (10 remaining credits: HH 620, HH 630, HH 690)

Financial Metric	MSN-DE (Base 77-Credit Cost)	MSN-DE (With 17 Prerequisite Transfers = 60 Credits)	MS-HHSL (Base 31-Credit Cost)	MS-HHSL (With 12 Catalog Transfers = 19 Credits)	MS-HHSL (With 21 Equivalency/ Transfer Credits = 10 Remaining Credits)
Per-Semester Program Fee	$850.00 / semester ($5,100 across 6 sem.)	$850.00 / semester ($4,250 across 5 sem.)	$0.00 / semester	$0.00 / semester	$0.00 / semester
Per-Semester Learner Resource Fee	$555.00 / semester ($3,330 across 6 sem.)	$555.00 / semester ($2,775 across 5 sem.)	$555.00 / semester ($1,665 across 3 sem.)	$555.00 / semester ($1,665 across 3 sem.)	$555.00 / semester ($1,110 across 2 remaining terms)
Total Institutional Fees	$8,430.00	$7,025.00	$1,665.00	$1,665.00	$1,110.00
Total Institutional Cost (Tuition + Fees)	$69,260.00	$54,425.00	$21,195.00	$13,635.00	$7,410.00 Remaining Cost
Out-of-Pocket Travel, Clinical, & Testing Costs	Airfare/lodging for 3 intensives (WI/TN), 585 hrs clinical travel, uniforms, background/drug screens, BON fees (~$2,500–$4,500)	~$2,500–$4,500	$0.00	$0.00	$0.00

SECTION 6: CAREER PROSPECTS, CREDENTIALING, & EARNINGS POTENTIAL (BLS 2025–2035 DATA)

6.1 Occupational Roles, Licensure/Certifications, & U.S. Bureau of Labor Statistics (BLS) Compensation

Career & Compensation Dimension	MSN-DE Pathway Outcomes	MS-HHSL Pathway Outcomes	Strategic Synthesis for Healthcare & Human Services Leaders
Primary Occupational Titles	Registered Nurse (RN), Clinical Nurse Leader (CNL), Nurse Educator, Clinical Care Coordinator (**Herzing MSN-DE**, **BLS RN**)	Social and Community Service Manager, Medical and Health Services Manager, Behavioral Health Director, Nonprofit Executive Director, Medicare/Care-Planning Director (**Herzing MS-HHSL**, **BLS Management**)	MS-HHSL positions graduates directly for executive, administrative, and program director roles without requiring bedside floor shifts.
Licensure & Professional Credentials	Eligible to sit for the NCLEX-RN state licensure exam upon passing NSG 635 Exit Exam (**Herzing MSN-DE**)	Qualifies for executive leadership and builds on the Human Services–Board Certified Practitioner (HS-BCP) credential from the Center for Credentialing and Education (**Herzing MS-HHSL**); pairs with existing Medicare Specialist Licensure	MS-HHSL confers an immediate comprehensive's credential independent of third-party state licensing board examinations.

Career & Compensation Dimension	MSN-DE Pathway Outcomes	MS-HHSL Pathway Outcomes	Strategic Synthesis for Healthcare & Human Services Leaders
BLS Median / Average Annual Salary (2025/2026)	Registered Nurses: $97,550/year median (**BLS RN OOH**) / $101,420/year mean ($48.76/hr) (**Herzing MSN-DE**)	Social & Community Service Managers: $80,390/year median (**BLS OOH**) / $86,100/year mean ($41.39/hr) (**Herzing MS-HHSL**)Medical & Health Services Managers: $123,860/year median (**BLS OOH**)	Combining an MS-HHSL degree with graduate healthcare/population health coursework (NU 725, NU 730, NU 780, NSG 633) and a Medicare Specialist license unlocks Medical and Health Services Manager roles ($123,860 median), exceeding bedside RN wages ($97,550 median).
Projected 10-Year Job Growth (2025–2035)	Registered Nurses: +6% from 2025–2035 (**BLS RN OOH**)Nurse Practitioners (requires Post-Comprehensive's Cert): +41% ($132,300 median) (**BLS Fastest Growing**)	Social & Community Service Managers: +7% from 2025–2035 (**Herzing MS-HHSL**)Medical & Health Services Managers: +24% from 2025–2035 (**BLS Fastest Growing**)	Both Social & Community Service Managers (+7%) and Medical & Health Services Managers (+24%) outpace the +6% growth rate of generalist RNs.
Post-Comprehensive's & Doctoral Advancement Pathways	Post-Comprehensive's APRN Certificates (AGACNP, AGPCNP, FNP, PMHNP, PNP, WHNP) or Doctor of Nursing Practice (DNP) / Doctor of Nursing Education (DNE) — Note: 9 credits (*NU 725*, *NU 730*, *NU 780*) count as DNP dual credit (**Herzing MSN-DE**)	Doctor of Behavioral Health (DBH — Clinical or Management), Doctor of Social Work (DSW), Doctor of Health Administration (DHA), PhD in Public Health / Human Services, or JD/ Health Law pathways (**Herzing Behavioral Health**)	Because the student has already completed NU 725, NU 730, and NU 780 (9 DNP-level credits) plus 40 total graduate credits, conferring the MS-HHSL degree provides immediate comprehensive's credentialing for doctoral or executive entry.
Physical, Sensory, & Occupational Sustainability	High physical/somatic demand (12-hour hospital floor shifts, lifting, infectious exposure, alarm fatigue, high occupational burnout risk)	High cognitive/strategic autonomy (remote, hybrid, or private-access executive management, policy analysis, program evaluation, care-planning leadership, and forensic program direction such as SAEF)	Aligns with neurodivergent/sensory ergonomics, eliminating hospital floor physical strain while maximizing research, policy, and strategic leadership strengths.

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CWRIGHT26 COMPLETE COMPENDIUM · VOLUME IV

VOLUME IV: Career Pathways, Licensure Trajectory (RN / WHNP-BC / Autonomous APRN / SANE) & Economic Mobility Analysis

COMPREHENSIVE CAREER, CREDIT EQUIVALENCY & SEQUENTIAL EDUCATION BLUEPRINT: HERZING MS-HHS (MAY 2027) TO EXTERNAL MSN-DE / WHNP-BC & AUTONOMOUS PRACTICE

Prepared For: Chavon J. Wright, M.S. (Forensic Psychology), B.S., A.A., A.S., A.G.S.
Source Foundation: **Chavon J. Wright — Comprehensive Academic Record (with Education Options)** · **MSNDE to HHS Equivalency Brief** · **MSNDE to HHS Interactive Matrix** · **HUADA Evidentiary Archive**

SECTION 1: DEEP DIVE — THE 21-CREDIT MS-HHS EQUIVALENCY & MAY 2027 CONFERRAL ARCHITECTURE

1.1 Executive Mechanics of the 21-of-31 Credit Conversion (67.7% Complete)

Within **Herzing University**'s graduate catalog, the Master of Science in Health and Human Services (MS-HHS) requires 31.00 total semester credit hours (22 core credits across 7 courses and 9 graduate elective credits across 3 courses). By auditing Chavon J. Wright's 40.00 completed credits at Herzing (Corrected Cumulative GPA: 3.55; Anatomy & Physiology GPA: 4.00) alongside her conferred M.S. in Forensic Psychology from Southern New Hampshire University (SNHU, 2024), 21.00 of the 31.00 required MS-HHS credits (67.74%) are already completed with grades of A and B:

MS-HHS Target Course	Credits	Completed Source Course(s)	Institution & Term	Grade & Credits	Curricular & Competency Alignment
HH 500: Foundations of Health and Human Services	3.00	NU 780: Population Health	Herzing (Summer 2025)	B (3.00 cr)	Epidemiological surveillance, social determinants of health (SDOH), community resource allocation, vulnerable population intervention, and interprofessional public health delivery.
HH 510: Research Methods and Evidence-Based Practice	3.00	NSG 660: Foundations of Scholarly Practice	Herzing (Fall 2025)	A (3.00 cr)	Graduate research design, quantitative/ qualitative methodology, biostatistical appraisal, PICOT formulation, IRB human-subjects protections, and evidence translation.

MS-HHS Target Course	Credits	Completed Source Course(s)	Institution & Term	Grade & Credits	Curricular & Competency Alignment
HH 600: Healthcare Systems, Policy, and Operations	3.00	NU 730: Systems-Based Practice	Herzing (Summer 2026)	B [81.27%] (3.00 cr)	Macro/micro healthcare financing, value-based reimbursement (CMS/ Medicare/Medicaid), organizational governance, health policy advocacy, and interdepartmental operations.
HH 610: Legal, Ethical, and Regulatory Compliance	3.00	NU 725: Health Care Informatics	Herzing (Summer 2025)	B (3.00 cr)	HIPAA/HITECH statutory compliance, EHR regulatory governance, clinical decision support architecture, cybersecurity ethics, and federal interoperability mandates.
MSW 510: Graduate Elective I (Clinical/ Behavioral)	3.00	NSG 524: Mental Health Nursing (or PSY 545: Forensic Psychology)	Herzing (Summer 2025) / SNHU	A (3.00 cr)	DSM-5-TR diagnostic criteria, trauma-informed psychiatric crisis intervention, psychopharmacology, legal hold statutes, and behavioral health case management.
MSW 521: Graduate Elective II (Quality/ Forensic Law)	3.00	NSG 633: Safety and Quality in Nursing Practice (or PSY 624: Law & Psychology)	Herzing (Summer 2025) / SNHU	A (3.00 cr)	Root Cause Analysis (RCA), Failure Mode and Effects Analysis (FMEA), Joint Commission/CMS patient safety metrics, and statutory/forensic regulatory compliance.
MSW 540: Graduate Elective III (Forensic/ Clinical)	3.00	PSY 545: Forensic Psychology (or PSY 624: Intersection of Law & Psychology)	SNHU (2022–2024)	A (3.00 cr)	Criminal and civil justice interface, victimology, forensic assessment, expert witness admissibility (Daubert/ Frye), and constitutional rights in human services.
TOTAL SATISFIED CREDITS	21.00	7 Completed Graduate Courses	Herzing & SNHU	3.57 Core GPA	Leaves only 10.00 credits (3 courses) for May 2027 MS-HHS degree conferral.

1.2 The 10-Credit Completion Schedule to May 2027 Conferral

With 21 credits satisfied, the entire remainder of the MS-HHS degree consists of 3 asynchronous online didactic courses (10.00 credits) across two 8-week terms, requiring 0 clinical practicum hours:

- Fall 2026 (Session B — 8 Weeks):
  - HH 620: Grant Writing and Resource Development (3.00 Credits / 45 Contact Hours / ~135 Total Study Hours): Covers federal/state grant prospecting

(**Grants.gov**, **OVW VAWA**, **Florida VOCA**), 501(c)(3) fiscal governance, logic model construction, line-item and narrative budgeting, and submission of a complete, fundable comprehensive grant proposal.

- Spring 2027 (Session A — 8 Weeks, Conferral May 2027):
  - HH 630: Strategic Planning and Program Evaluation (4.00 Credits / 60 Contact Hours / ~180 Total Study Hours): Covers PESTLE/SWOT environmental scanning, organizational hierarchy optimization, utilitarian vs. deontological crisis rationing, 12-month Gantt rollout manuals, and quantitative/qualitative program evaluation systems.
  - HH 690: Health and Human Services Capstone (3.00 Credits / 45 Contact Hours / ~135 Total Study Hours): Synthesizes the entire MS-HHS curriculum into the comprehensive institutional launch manual for Sexual Assault Elite Forces (SAEF)—architecting its hybrid Direct Primary Care (DPC) + 501(c)(3) legal structure, **Marion County SART MOUs**, **DOJ SANE protocols**, and **SAKI CODIS evidence workflows**.

1.3 Bypassing the 26 Prelicensure Clinical Credits & 405 Unpaid Hospital Hours

Transitioning to the MS-HHS immediately bypasses 26.00 prelicensure clinical/didactic credits in the **Herzing MSN-DE** track that are currently obstructed by Herzing's multi-term administrative failure to secure a clinical site for NSG 523:

- Bypassed Prelicensure Courses (26.00 Credits & 405 Clinical Hours): NSG 523 Medical-Surgical Nursing I (5.00 cr), NSG 526 Nursing Care of Childbearing & Childrearing Families (5.00 cr, 90 clinical hrs), NSG 627 Medical-Surgical Nursing II (5.00 cr, 135 clinical hrs), NSG 628 Complex Nursing Care (5.00 cr, 90 clinical hrs), NSG 634 Role Transition & Leadership (3.00 cr, 90 clinical hrs), and NSG 635 Licensure Readiness / HESI Exit Exam (3.00 cr).
- Net Resource Recovery:
  - Tuition Saved at Herzing: $13,530 ($8,250 for 10 MS-HHS credits at $825/cr vs. $21,780 for 26 MSN-DE credits at $825/cr + $330 clinical/exam fees).
  - Time & Labor Saved: 855 total instructional/study hours (450 hours vs. 1,305 hours) and 405 unpaid 12-hour hospital floor clinical hours eliminated, moving graduation up by 7–12 months (May 2027 vs. December 2027 / Spring 2028).

SECTION 2: LABOR MARKET, COMPENSATORY ECONOMICS & CREDENTIALING DEEP DIVE (BLS 2025–2035)

2.1 Comparative Labor Market Matrix: Executive Leadership vs. Bedside RN & APRN Tracks

Data compiled from the **U.S. Bureau of Labor Statistics Occupational Outlook Handbook** (2025–2035 projections), **BLS Medical and Health Services Managers**, and Herzing University's institutional career disclosures (**MSNDE to HHS Matrix**):

Occupational Role	BLS Median Annual Pay	Herzing Mean Wage Disclosure	10-Year Job Growth (2025–2035)	Licensure & Gatekeeping Requirements	Physical & Sensory Environm

Occupational Role	BLS Median Annual Pay	Herzing Mean Wage Disclosure	10-Year Job Growth (2025–2035)	Licensure & Gatekeeping Requirements	Physical & Sensory Environm
Medical and Health Services Manager (**BLS**)	$123,860 (Top 10%: >$216,750)	$123,860+	+24% (Much faster than average)	Master's degree in Health/Human Services, Healthcare Admin, or Public Health; no NCLEX-RN or HESI Exit gatekeeping required.	Executive office, remote/ hybrid systems leadersh policy & fiscal oversight zero 12-h floor shif sensory alarm fat
Social and Community Service Manager (**BLS**)	$80,390 (Top 10%: >$127,900)	$86,100	+7% (Faster than average)	Bachelor's or Comprehensive's in Human Services/Social Work; qualifies for HS-BCP credentialing without state clinical floor exams.	Agency directors grant/ program evaluatio SART coordina remote/ hybrid manager
Registered Nurse (Bedside / Acute Care) (**BLS**)	$97,550	$101,420	+6% (Average)	Requires passing NSG 635 HESI Exit Exam (900 benchmark) AND state NCLEX-RN under **Fla. Stat. § 464.008**.	Acute hospital f staffing, mandato 12-hour physical shifts, he lifting, continuo telemetry sensory alarm fat
Nurse Practitioner (WHNP-BC / APRN) (**BLS**, **NCC**)	$132,300 (Autonomous DPC: $180,000+)	$132,300	+41% (Fastest growing healthcare role)	Requires RN license + CCNE/ ACEN APRN specialty track + national board exam (NCC WHNP-BC); NOT conferred by Herzing's generalist MSN-DE alone.	Outpatie specialty clinic, forensic examinat suite, or autonom Direct Primary C (DPC) boutique practice.

2.2 The Dual-Comprehensive's + Medicare Specialist + Clinical Systems Multiplier

Completing the MS-HHS in May 2027 does not place Chavon at an entry-level human services starting line; it consolidates an elite four-pillar executive profile that immediately commands $86,100 to $123,860+ in healthcare and forensic systems management:

1. Graduate Healthcare Systems, Quality, & Informatics Core (Herzing, 3.55 GPA): Completed graduate-level coursework in Population Health (**NU 780**, B), Systems-Based Practice (**NU 730**, B), Health Care Informatics (**NU 725**, B), Safety & Quality in Nursing Practice (**NSG 633**, A), and Scholarly Practice (**NSG 660**, A)—plus 180 hours of acute hospital clinical experience (including HCA Healthcare Osceola Hospital PCU & Emergency Department in NSG 525, Grade A).
2. Multi-State Medicare & Healthcare Financing Licensure: Licensed Medicare Sales & Compliance Specialist across 30+ states (Kaiser Permanente, 2020–2022, achieving a 75% conversion rate and managing 120+ daily CMS/Medicare regulatory inquiries). Pairing 30-state Medicare regulatory fluency with NU 730 (Systems-Based Practice) and HH 620/630 (Grant Writing & Strategic Evaluation) directly qualifies her for Managed Care Director, CMS Compliance & Quality Improvement Director, Patient Access & Utilization Review Executive, and Regional Hospital Grant/Program Director roles.
3. completed graduate coursework in the M.S. in Forensic Psychology program (SNHU, 2024) + Federal/DoD Survivor Leadership: Combines graduate forensic psychology (PSY 545, PSY 624) with national leadership as Survivor Services Assistant Manager at **RAINN** (overseeing Department of Defense sexual assault response operations, 2023–2024) and Founder & Director of Care Management at Fundamental Human Wrights, Inc. (100% donor retention, 2020–2024).
4. Immediate Doctoral & Credentialing Pathways (Zero Floor Shifts Required):
    - HS-BCP (Human Services—Board Certified Practitioner): Administered by the Center for Credentialing & Education (CCE); the MS-HHS degree + prior leadership experience satisfies all educational and field requirements immediately upon May 2027 conferral.
    - Direct Doctoral Entry (DBH, DSW, DHA, or PhD): With two conferred Master's degrees (M.S. in Forensic Psychology [2024] + M.S. in Health and Human Services [May 2027]) and 15 graduate nursing/health science credits, she qualifies immediately for advanced standing in a Doctor of Behavioral Health (DBH), Doctor of Social Work (DSW), Doctor of Health Administration (DHA), or PhD in Health Policy / Forensic Psychology—completely bypassing bedside hospital floor staffing.

SECTION 3: COMPLETE INVENTORY OF EARNED ACADEMIC & CLINICAL CAPITAL (2007–2026)

Per **Chavon J. Wright — Comprehensive Academic Record (with Education Options)**, Chavon holds more than 250 cumulative undergraduate and graduate semester credits across six accredited institutions, providing an extraordinary credit bank for both immediate MS-HHS conferral and subsequent external degree or nursing/WHNP pathways:

Institution & Dates	degrees awarded / Standing	GPA & Honors	Key Transferable Science, Clinical, & Graduate Coursework

Institution & Dates	degrees awarded / Standing	GPA & Honors	Key Transferable Science, Clinical, & Graduate Coursework
Herzing University (2024–2026)	40.00 Earned Credits (Transitioning to MS-HHS for May 2027 Conferral)	3.55 Corrected GPA (4.00 Science GPA)	Undergraduate Sciences (8 cr, 4.00 GPA): SC 154 Anatomy & Physiology I w/ Lab (4 cr, A), SC 254 Anatomy & Physiology II w/ Lab (4 cr, A).Graduate Nursing & Clinical Core (32 cr): NSG 520 Pathophysiology & Pharmacology (4 cr, B), NSG 521 Fundamentals/ Health Assessment (5 cr, B, 45 clin hrs), NSG 522 Clinical I (2 cr, A, 90 clin hrs), NSG 524 Mental Health Nursing (3 cr, A), NSG 525 Clinical II at HCA Osceola PCU/ED (3 cr, A, 45 clin hrs), NSG 633 Safety & Quality (3 cr, A), NSG 660 Scholarly Practice (3 cr, A), NU 725 Health Care Informatics (3 cr, B), NU 780 Population Health (3 cr, B), NU 730 Systems-Based Practice (3 cr, B [81.27%]).
Southern New Hampshire University (SNHU) (2022–2024)	M.S. in Forensic Psychology (Conferred 2024)	Graduate Good Standing	PSY 545 Forensic Psychology (3 cr, A), PSY 624 Intersection of Law and Psychology (3 cr, A), plus full graduate forensic assessment, victimology, and research sequence.
Eastern Oregon University (EOU) (2019–2021)	B.S. in Integrative Studies (Conferred 3/19/2021; Minors: English/Writing & History)	3.30 GPA (Dean's List x2; 61 EOU cr / 184 quarter cr)	HIST 415 Blood, Phlegm & Bile (History of Medicine), SOC 336 Social Change & Social Justice, WR 360 Literacy, Discrimination & Power, ENGL 316 Approaches to Grammar, HIST 314 The Great Depression.
Lane Community College (2018–2019)	Three Associate Degrees (Conferred 3/23/2019: A.A. Oregon Transfer, A.S. Science, A.G.S.)	4.10 GPA (President's List; 30 cr)	WR 121_H Honors Academic Composition (A+), WR 122_H Honors Argument/Research (A+), ETHN 101 Ethnic Studies (A), HE 252 First Aid/CPR (A), HE 275 Lifetime Health & Fitness (A).

Institution & Dates	degrees awarded / Standing	GPA & Honors	Key Transferable Science, Clinical, & Graduate Coursework
Georgia State University (GSU) (2007–2011) & Savannah State (2006–2007)	119 Earned Semester Hours (89 GSU + 30 SSU Transfer; Biology Major)	Beta Beta Beta Biological Honor Society	CHEM 1211K/ 1212K Principles of Chemistry I & II w/ Lab (8 cr), CHEM 3100 Organic Chemistry Lab (2 cr, A), BIOL 2107K/ 2108K Principles of Biology I & II w/ Lab (8 cr), BIOL 2300/2310 Microbiology & Public Health w/ Lab (4 cr), BIOL 3020 Infectious Disease & Society (3 cr, A), BIOL 3440 Evolutionary Biology (3 cr, B+), BIOL 3840 Animal Biology (4 cr, A), BIOL 4930 Drugs & the Nervous System (3 cr, B+), PHYS 1111K Introductory Physics I (4 cr), MATH 1070 Elementary Statistics (3 cr), HHS 2010 Medical Terminology (3 cr, B).

SECTION 4: SPECIFIC EXTERNAL EDUCATION PATHWAYS — THE SIX-SCHOOL MATRIX & SEQUENTIAL MSN-DE / WHNP-BC STRATEGY

Per **Chavon J. Wright — Comprehensive Academic Record (with Education Options)**, Chavon has two synergistic ways to deploy her existing nursing and science credits after (or alongside) completing the MS-HHS at Herzing in May 2027:

1. The Six-School Matrix (High-Transfer Second Bachelor's / Health Administration / Health Sciences Options): Utilizes her 2021 B.S., GSU/Lane sciences, and Herzing SC 154/254 + graduate nursing electives to confer an additional specialized Health Sciences, Health Services Administration, or Biology credential with minimal residency credits.
2. The Sequential **MS-HHS First -> External MSN-DE / ABSN / WHNP-BC Second** Pathway: Completes the MS-HHS in May 2027 (securing her second Master's degree and executive income potential), then transfers her 4.00 GPA Anatomy & Physiology (SC 154/254), Microbiology, Statistics, and eligible graduate nursing core courses (NSG 660, NU 725, NU 780, NSG 633, NSG 520) into an external CCNE/ACEN-accredited nursing and Women's Health Nurse Practitioner (WHNP-BC) program.

4.1 The Six-School Matrix from the 'with Education Options' Record (Exact Courses, Transfer Rules, Costs, & Timelines)

Institution & Program	Second-Degree & Credit-Transfer Policy	Courses Already Satisfied by Chavon's Record	Exact Remaining Course Pathway	Tuition Rate & Est. Total Cost

Institution & Program	Second-Degree & Credit-Transfer Policy	Courses Already Satisfied by Chavon's Record	Exact Remaining Course Pathway	Tuition Rate & Est. Total Cost
1. **UCF Online**B.S. in Health Services Administration	Prior regionally accredited B.S. (EOU 2021) waives all FL General Education & foreign language under **UCF Admissions**; requires >=30 residency credits at UCF.	Gen-Ed block (36 cr) waived; STA 2014/2023 met by GSU MATH 1070; HSC 3537 Medical Terminology met by GSU HHS 2010.	4 Prereqs (12 cr via **FL Transient** / State College): ECO 2023, ACG 2021, ACG 2071, CGS 2100C.UCF HSA Core (48 cr): HSA 3111, HSA 3170, HSA 3222, HSA 3423, HSA 3430, HSA 4109, HSA 4180, HSA 4191, HSA 4702, HSA 4939 (Internship/ Capstone), HIM 3006, HSC 4201, HSC 4500, HSC 4564, PHC 4069, PAD 4844.	$179.19/ credit (FL resident online)~$8,60 at UCF (+ ~$1,200 for 4 state-college business prereqs)
2. **UF Online**B.S. in Health Education & Behavior (Community Health Promotion)	**UF Second Bachelor's Policy** waives Gen-Ed & Writing/Math requirement; all 7 tracking courses must be completed BEFORE applying.	PSY 2012 (GSU), STA 2023 (GSU MATH 1070), BSC 2005/2010 (GSU BIOL 2107K/2108K), MCB 2000 (GSU BIOL 2300/2310). Herzing SC 154/254 (A, 2025) petitioned for APK 2100C/2105C.	Pre-Application: MAC 1105 College Algebra (3 cr at state college) + written UF confirmation accepting Herzing SC 154/254.UF Major Core (~42 cr): HSC 2103, HSC 3032, HSC 3201, HSC 4302, HSC 4713, HSC 4800, HUN 2201, 12 cr Department Specialization Electives (3000/4000 level), HSC 4876 (12-cr full-semester internship).	$129.18/ credit (FL resident online)~$5,40 at UF (lowest cost per credit in the US)
3. **FAMU Online**B.S. in Health Science General / B.S. in Health Care Management (HBCU)	**FAMU Transfer Policy** waives Gen-Ed for prior B.S. holders; requires >=30 of last 36 credits in residence at FAMU.	Gen-Ed block (36 cr) waived; A&P I/II (SC 154/254), Microbiology (BIOL 2300), Statistics (MATH 1070), Chemistry (CHEM 1211K/1212K), and Psychology (PSYC 1101) met.	~40–67 Upper-Division Credits in Health Science or Health Care Management (requires written Program Director verification that all required major courses are offered 100% online via **FAMU Admissions**).	$151.78/ credit (FL resident online)~$4,55 $10,169

Institution & Program	Second-Degree & Credit-Transfer Policy	Courses Already Satisfied by Chavon's Record	Exact Remaining Course Pathway	Tuition Rate & Est. Total Cost
4. **Thomas Edison State University (TESU)**B.S. in Health Studies or **B.A. in Biology**	Under **TESU Second Degree Policy**, requires >=24 NEW credits earned AFTER the first B.S. (2021)—which Chavon's 40 Herzing credits (2024–2026) already satisfy! No science recency limit.	Gen-Ed (45 cr) waived; Herzing SC 154/254 → BIO-2110/2120 (8 cr); GSU Micro → BIO-2510 (4 cr); NU 780 → SOS-3700 Epidemiology/ Pop Health; up to 30 Herzing/SNHU graduate credits apply to Professional/Free Electives.	Health Studies Core (~18–24 cr at TESU): HCM-3070 Health Care Management, HCM-3080 Health Services Org, HCM-4040 Legal Aspects of Health Care, GER-3120 Aging & Health, HEA-3050 Women's Health, HEA-3060 Multicultural Health, SOC-3220 Medical Sociology, LIB-4970 Liberal Arts Capstone (or 6-cr residency: SOS-1100 + LIB-4970 w/ Accelerate waiver).	$584/credit OI $4,561/term fl rate (9–16 cr/ term)~$9,122 across 2 flat-rate terms (or ~$6,972 via 6- cr residency + $3,468 Accelerate fee
5. **Charter Oak State College**B.S. in General Studies (Health Studies) / B.S. in Health Care Admin	Under **Charter Oak 2nd Degree Policy**, requires >=30 new credits post-2021 and only 6 credits in residence at Charter Oak (IDS 101 + Capstone).	Gen-Ed (40 cr) waived; Herzing SC 154/254, NU 725, NU 780, NSG 633, NSG 660 apply toward the 30-credit post-2021 new credit rule and Health Studies concentration electives.	Minimum 6 Residency Credits at **Charter Oak**: IDS 101 Cornerstone Seminar (3 cr) + ISS 497 General Studies Capstone or HCA 499 Health Care Admin Capstone (3 cr), plus any remaining upper-level HCA courses (HCA 101, 201, 211, 301, 315, 320, 410, 460) not waived by graduate nursing credits.	$329/ credit (same rate for all states) + ~$300/sem fee~$2,574 (6 cr residency floor) to ~$9,900 (30 c

Institution & Program	Second-Degree & Credit-Transfer Policy	Courses Already Satisfied by Chavon's Record	Exact Remaining Course Pathway	Tuition Rate & Est. Total Cost
6. **Excelsior University**B.S. in Health Sciences (Management or Public Health Track)	Under **Excelsior Additional Degree Policy**, accepts up to 113 transfer credits with a 7-credit residency floor and >=30 new credits post-2021. Science 5-yr rule does not apply to Health Sciences.	Gen-Ed (53 cr) waived; Herzing SC 154/254 (A, 2025) + GSU sciences satisfy natural sciences; Herzing/SNHU graduate credits satisfy post-2021 new credit rules and concentration electives under **Excelsior Credit Policy**.	7-Credit Residency Floor at **Excelsior**: INL 102 Information Literacy (1 cr), IND 101 Cornerstone (3 cr), and HSC 464 Health Sciences Capstone (3 cr), plus any unwaived core modules (HSC 310, HSC 320, HSC 330, HSC 365, HSC 414, HSC 450).	$510/ credit~$3,570 (7-cr residency floor) to ~$15,300 (30 cr)

4.2 Phase 2 Sequential Nursing Strategy: Completing Herzing MS-HHS First (May 2027), Then Entering an External MSN-DE / ABSN / WHNP-BC Program

By completing the MS-HHS at Herzing in May 2027 first, Chavon protects her GPA (3.55), secures a conferred healthcare leadership Master's degree in just 10 credits, avoids Herzing's broken clinical placement pipeline, and preserves her 40.00 Herzing science/nursing credits to apply toward an external, properly supported prelicensure nursing and WHNP-BC pathway:

External Nursing / APRN Pathway	Target Institutions & Accreditation	How Chavon's Earned Credits (SC 154/254, NSG, NU) Transfer	Remaining Clinical & Didactic Scope	Estimated Cost & Duration	Stra Adv WH
Option A: Florida Public Direct-Entry MSN (DEMSN)	**University of West Florida (UWF) Direct-Entry MSN** (**Catalog**) — CCNE Accredited	100% of Science Prereqs Satisfied: Herzing SC 154 A&P I (4 cr, A, 2025) & SC 254 A&P II (4 cr, A, 2025) satisfy the strict 5-to-7 year science recency rule; GSU BIOL 2300 (Microbiology) & MATH 1070 (Statistics) satisfy remaining prerequisites. Graduate petition for up to 9–12 cr of graduate core (NSG 660 Research, NU 725 Informatics, NU 780 Pop Health, NU 730 Systems).	~39–45 prelicensure clinical & core credits across 5 semesters with university-guaranteed Florida clinical placements (94% + first-time NCLEX pass rate).	~$384/credit (FL resident state tuition)~$15,000–$19,500 total	Low Dire in F univ is le of p DE con NCL elig imm into Cor WH

External Nursing / APRN Pathway	Target Institutions & Accreditation	How Chavon's Earned Credits (SC 154/254, NSG, NU) Transfer	Remaining Clinical & Didactic Scope	Estimated Cost & Duration	Stra Adv WH
Option B: Direct-Entry MSN with Integrated WHNP Track	**Regis College Accelerated Direct-Entry MSN (WHNP Track)** or **Bay Path University Online DEMSN** — CCNE Accredited	SC 154/254 (A&P I & II, 4.0 GPA), GSU Microbiology, Chemistry, and Statistics satisfy all natural science entry gates; graduate nursing core (NSG 660, NU 725, NU 780, NSG 633) eligible for graduate transfer credit evaluation (up to 9–12 credits).	Prelicensure RN year (12–16 months) → sit for NCLEX-RN → transition seamlessly into the Women's Health Nurse Practitioner (WHNP) clinical specialty tracks (~12–15 months) without reapplying.	~$950–$1,100/ credit(Offset by MS-HHS executive income & HRSA Nurse Corps / VAWA scholarships)	Sing App to-V Pipe Her gen DE NOT WH Reg prel and BC prep one curr
Option C: Florida Hybrid Direct-Entry MSN / ABSN	**West Coast University (Miami Hybrid DEMSN)** or **Utica University Florida ABSN/ MSN** — CCNE Accredited	Transfers Herzing SC 154 (A&P I, A) and SC 254 (A&P II, A) + GSU sciences; petitions graduate core waivers (NU 725 Informatics, NU 780 Pop Health, NSG 660 Research, NSG 633 Quality/ Safety) to reduce didactic courseload.	5–6 trimesters (16–24 months) hybrid online didactic + dedicated Florida regional simulation center and contracted hospital clinical cohorts.	~$28,000–$42,000 (after transfer waivers)	Ded Reg Plac Tea the plac bott stal 523 plac in g coh
Option D: Florida Public Fast-Track ASN/ABSN → Post-Comprehensive's WHNP Bridge	FL State College (e.g., College of Central Florida / Valencia / Santa Fe) ASN/ABSN → CCNE Online WHNP Bridge	SC 154/254 (4.0 GPA), GSU Microbiology, Statistics, and Gen-Ed waive 100% of non-nursing prerequisites; after passing NCLEX-RN, Herzing's 15 graduate nursing credits (NSG 660, NU 725, NU 780, NU 730, NSG 633) + NSG 520/521 transfer into an RN-to-MSN/WHNP program.	Step 1: 30–42 nursing clinical credits at FL public college (~12 months) → NCLEX-RN.Step 2: 24–30 specialty WHNP credits (~12 months).	Step 1: ~$4,500–$7,500 ($105–$130/cr)Step 2: ~$12,000–$18,000	High Loc Cou Con clin loca Mar (bui rela dire ~1/4 of p univ

4.3 The 4-Stage Regulatory & Practice Comprehensive Roadmap to Autonomous APRN & SAEF

1. Stage 1 — Confer Herzing MS-HHS & Launch SAEF 501(c)(3) Infrastructure (May 2027):
    - Complete HH 620 (Fall 2026 B), HH 630 (Spring 2027 A), and HH 690 (Spring 2027 A — SAEF Capstone).
    - Incorporate the 501(c)(3) survivor-services arm of SAEF (**Hybrid Legal Primer**), request free federal grant technical assistance from **OVC TTAC**, submit **Florida VOCA** and **OVW VAWA STOP/SASP** grant applications written in HH 620, and join the Marion County Sexual Assault Response Team (SART) using the **NSVRC SART Toolkit** and **OVC SART Toolkit**.
1. Stage 2 — External RN Licensure, Forensic Credentialing (ANCC SANE-A & ABMDI), & WHNP-BC (2027–2029):
    - Complete the selected external nursing bridge (UWF DEMSN, Regis DEMSN-WHNP, or FL Public ASN/ABSN → WHNP) and obtain Florida RN licensure by examination under **Fla. Stat. § 464.008** via the **Florida Board of Nursing**.
    - Immediately stack forensic credentials: earn SANE-A / SANE-P certification through the **American Nurses Credentialing Center (ANCC)** (which assumed SANE certification from the dissolving IAFN in April 2026) aligned with the **DOJ SANE Program Development and Operation Guide** and **OVC TTAC Interactive Guide**, plus the **American Board of Medicolegal Death Investigators (ABMDI)** registry credential.
    - Pass the national **NCC WHNP-BC Certification Exam** and align clinical protocols with **NPWH**, **AANP**, **AWHONN**, and **NBNA**.
1. Stage 3 — Florida Autonomous APRN Registration (**Fla. Stat. § 464.0123**):
    - Under **Fla. Stat. § 464.0123** (**HB 607 Summary**) and **Fla. Admin. Code r. 64B9-4.020**, log 3,000 clinical practice hours under physician supervision within a 5-year window alongside 3 graduate credits in differential diagnosis and 3 graduate credits in pharmacology (satisfied via NSG 520 + WHNP advanced pharm/diagnosis).
    - File the **Florida Autonomous APRN Registration** with the **Florida Board of Nursing** to practice 100% independently without a supervisory physician protocol (**Autonomous APRN Guide**).
1. Stage 4 — Full SAEF Boutique Direct Primary Care (DPC) + Law-Enforcement-Integrated Forensic Hub:
    - Operate an upscale Direct Primary Care (DPC) flat-fee women's health membership clinic (**DPC Coalition**, **DPC Alliance**, **Wharton Concierge Model Analysis**) paired with the 501(c)(3) SAEF survivor-services clinic (secured parking, single-use entry codes, 06:00–02:00 hours).
    - Execute law enforcement custody and kit-retention MOUs under **EVAWI SARRT Module 15** and **SAKI CODIS Unsubmitted Kit Standards**, conduct trauma outcome trials under the **APA Trauma-Research IRB Guide**, and advance Statute-of-Limitations (SOL) tolling-at-disclosure legislation alongside **RAINN Model SOL Recommendations**, **CHILD USA's State SOL Tracker**, and **End the Backlog**.

SECTION 5: APPLIED LEGAL, REGULATORY, ARBITRATION, & TECHNOLOGICAL COMPETENCIES BUILT THROUGH THE ADVOCACY PROCESS

Across 181+ documented hours and 40,200+ words of forensic investigation, statutory briefing, discovery compilation, and full-stack web engineering (**HUADA Evidentiary Archive**, **Equivalency Brief**, **MSNDE-to-HHS Interactive Matrix**), Chavon J. Wright has built an executive-level command of healthcare/educational law, regulatory enforcement, arbitration strategy, and legal-tech engineering that directly amplifies her career marketability:

Competency Domain	Statutory, Regulatory, & Technical Frameworks Thoroughly Commanded	Concrete Deliverables & Evidentiary Work Product Built	Direct Career & SAEF Executive Application
1. ADA Title III & Section 504 Disability Law & Ergonomic Access	42 U.S.C. § 12182 (ADA Title III), 29 U.S.C. § 794 (Section 504 of the Rehabilitation Act), 34 C.F.R. § 104.44 (Academic Adjustments), interactive-process jurisprudence, and assistive technology interoperability.	Proved systemic institutional failure to configure 1.5x–2.0x extended time in NU 700 & NU 760; documented software collisions between Read&Write assistive tech and Guardian Browser/ProctorU; engineered the MS-HHS Curricular Equivalency Remedy to bypass 12-hour acute floor strain and sensory alarm fatigue.	Qualifies for Healthcare ADA/Section 504 Compliance Officer, Patient Civil Rights Advocate, and designing SAEF's trauma-informed, neuro-inclusive clinical environment (sensory-regulated exam suites and accessible digital intake).
2. FERPA Statutory Enforcement, Transcript Forensics, & Audit Trails	20 U.S.C. § 1232g (FERPA), 34 C.F.R. § 99.10 (Right to Inspect & Review within 45 days), 34 C.F.R. §§ 99.20–99.22 (Record Amendment & Formal Hearing Rights), and 34 C.F.R. § 99.32 (Mandatory Disclosure Recordkeeping).	Conducted a mathematical audit of NU 730 proving an 81.27% (Grade B) earned score against ungrounded portal entries; audited cumulative GPA from 3.43 to 3.55; drafted statutory demands for Canvas LMS SQL grade-mutation logs and § 99.32 third-party access logs.	Directly translates to Health Information Management (HIM) & HIPAA/FERPA Privacy Officer roles, Clinical Quality/Audit Director, and maintaining chain-of-custody forensic integrity for SAEF sexual assault evidence kits (**EVAWI Module 15**).
3. Title IV Financial Aid Governance, SAP Appeals, & Borrower Defense	34 C.F.R. § 668.34 (Satisfactory Academic Progress [SAP] qualitative & quantitative standards), 34 C.F.R. § 685.206 / § 685.401 (Borrower Defense to Repayment for substantial misrepresentation & breach of contract), and 5 U.S.C. § 552 (FOIA).	Built multi-tier SAP appeals proving institutional causation for pace delays (NSG 523 clinical non-placement); quantified $13,530 in net tuition savings and $58,690 in at-risk credit value; structured federal Borrower Defense and FOIA filings alongside Higher Learning Commission (HLC) accreditation complaints.	Equips Chavon for Healthcare Revenue Cycle & Federal Grant Compliance Director roles, managing federal VOCA/OVW grant audits (2 C.F.R. Part 200 Uniform Guidance), and protecting SAEF from regulatory clawbacks.

Competency Domain	**Statutory, Regulatory, & Technical Frameworks Thoroughly Commanded**	**Concrete Deliverables & Evidentiary Work Product Built**	**Direct Career & SAEF Executive Application**
4. Litigation Readiness, Anti-Spoliation Directives, & Arbitration Strategy	Federal Rules of Civil Procedure (FRCP Rule 37(e) ESI preservation), formal Litigation Hold & Anti-Spoliation Notices, consumer/educational arbitration clauses vs. agency enforcement carve-outs, and multi-jurisdictional administrative pleadings.	Authored formal Spoliation Hold Directives locking down Canvas LMS logs, ProctorU video/ telemetry streams, and internal faculty communications; coordinated filings across DOJ Civil Rights Division, U.S. Dept. of Education OCR, FL CIE, WI DSPS, and HLC; built bates-indexed evidentiary dossiers.	Prepares Chavon to serve as an Expert Forensic Consultant, Risk Management & Legal Compliance Director, and Chief Executive negotiating law enforcement SART MOUs, crime-lab handoff contracts, and state legislative SOL-tolling bills.
5. Full-Stack Legal-Tech Engineering & Telemetry Forensics (**HUADA** Suite)	HTML5, CSS3, JavaScript interactive data modeling, proctoring telemetry log forensics (CPU/ RAM thread starvation, WebRTC packet drops, automated session kills), and evidentiary web publishing.	Designed and coded the multi-page HUADA Interactive Evidentiary Web Suite (**priority.html**, **msnde-hhs.html**), transforming 40,200+ words of raw academic transcripts, statutory citations, and financial models into an interactive, searchable legal-tech portal.	Combines with NU 725 (Health Care Informatics) to qualify her for Clinical Informatics & Digital Health Director roles, while providing the exact technical architecture needed to build SAEF's secure survivor portal, single-use access-code dispatch system, and longitudinal forensic evidence tracker.

ACCESSIBILITY NAVIGATION: [↑ Cover & Disclaimer] · [↑ Table of Contents] · [↑ Case & Ticket Sheet] · [↑ Updated CV & SNHU Audit] · [↑ Angie MP4 & Transcript] · [↑ Gemini Podcast & Transcript] · [↑ Sarah Millard & Emails Addendum] · [Vol I] · [Vol II] · [Vol III] · [Vol IV] · [Vol V] · [Vol VI] · [Vol VII] · [Vol VIII] · [Vol IX] · [Vol X] · [↓ Table of Cases (Chronological)] · [↓ Table of Statutes] · [↓ Legal & Clinical Glossary] · [↓ Reference Registry] · [↓ Complete Index]

CWRIGHT26 COMPLETE COMPENDIUM · VOLUME V

VOLUME V: Federal, Wisconsin & Florida Civil, Statutory, Contractual, Equitable & Consequential Damages Compendium

COMPREHENSIVE LEGAL, STATUTORY, & ACTUARIAL DAMAGES DOSSIER: FEDERAL, WISCONSIN, & FLORIDA LIABILITY ANALYSIS & MASTER PROJECT REFERENCE REGISTRY

Prepared For: Chavon Jenea Wright, M.S. (Forensic Psychology), B.S., A.A., A.S., A.G.S. (Student ID: W24672939)
Respondent Institution: **Herzing University, Inc.** (Corporate Headquarters: 275 W. Wisconsin Ave., Ste. 210, Milwaukee, WI 53203; Main Campus: 5218 E. Terrace Dr., Madison, WI 53718; OPE ID: 00962100 / IPEDS UnitID: 240392)
Active Regulatory Dockets: U.S. Dept. of Education OCR Case No. 05-26-2347 · U.S. DOJ Civil Rights Referral 766398-JVT · Herzing SAP Appeal Case 00542344 · EthicsPoint Report Key 607735433401 · ProctorU/Meazure Ticket 7407283
Integrated Project Series:

1. Document 1 (MS-HHS Syllabus): **CW. 10.18. Herzing HH 630 and HH 620. Chavon Wright. Graduate Syllabus**
2. Document 2 (MSN-DE Syllabus): **CW. 10.18. Herzing MSNDE. Chavon Wright. Graduate Syllabus**
3. Document 3 (Program Comparison): **CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Program Comparison**
4. Document 4 (Career & Education Pathways): **CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Career and Education Pathways**
5. Document 5 (Legal & Statutory Damages — Present Volume): **CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Legal and Statutory Damages**
6. Comprehensive Project Notebook: **MSNDE to HHS Gemini Notebook**

SECTION 1: MULTI-JURISDICTIONAL NEXUS, CHOICE OF LAW, & CAUSE-OF-ACTION ARCHITECTURE

1.1 Tri-Jurisdictional Legal Nexus (Federal, State of Wisconsin, & State of Florida)

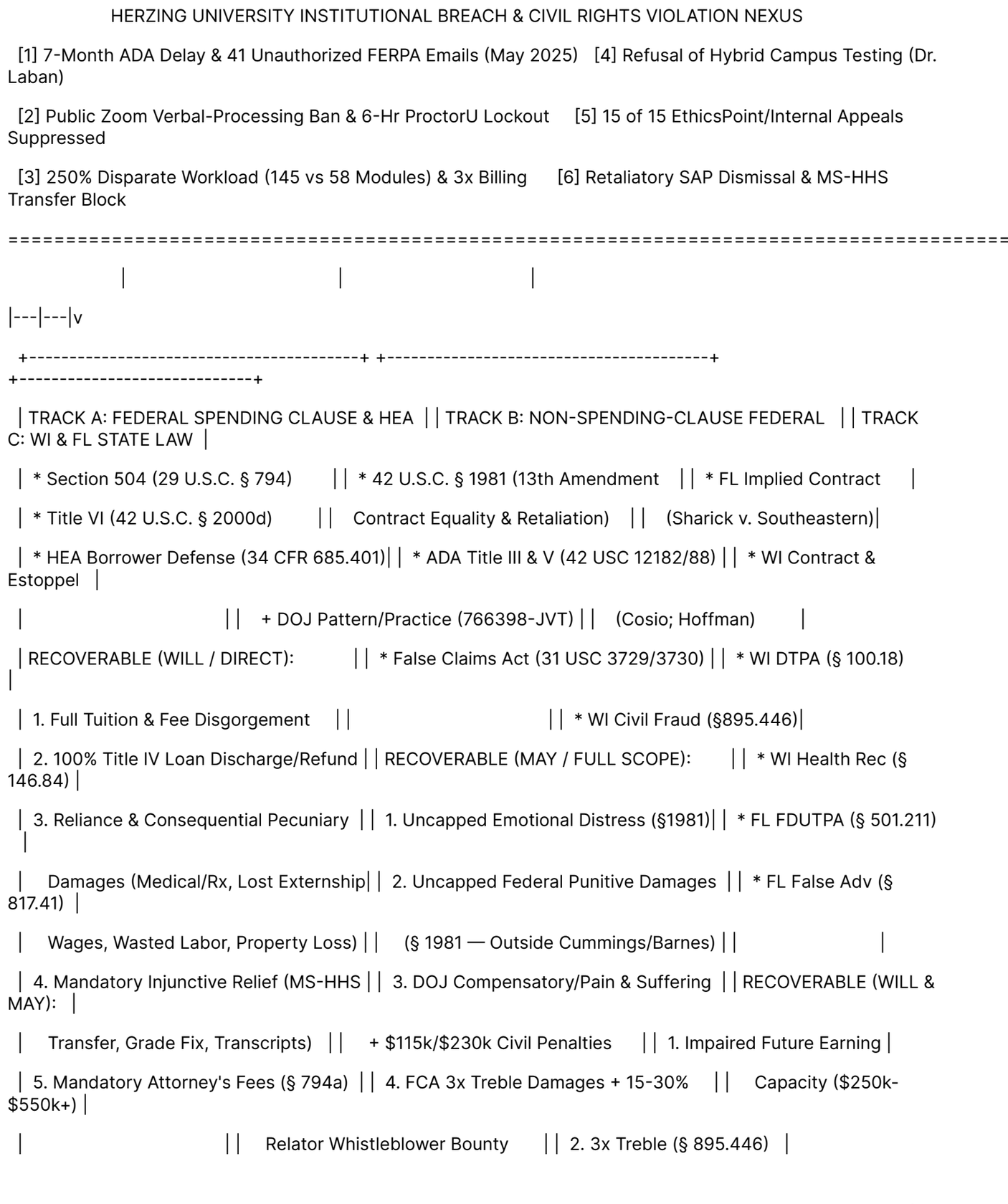
Because **Herzing University** is incorporated and headquartered in Wisconsin (Milwaukee and Madison, WI) while recruiting, contracting with, billing, and educating Chavon J. Wright in Florida (Marion Oaks/Ocala, FL, including in-state hospital clinical rotations at HCA Healthcare Osceola Hospital) using Federal Title IV Student Aid (OPE ID 00962100), Herzing is simultaneously subject to three overlapping sovereign legal regimes:

1. Federal Jurisdiction (**28 U.S.C. § 1331** & **§ 1343**): Governs civil rights, disability accommodations, racial contract equality, student privacy, and federal student aid compliance under Section 504 of the Rehabilitation Act (29 U.S.C. § 794), Title III & Title V of the ADA (42 U.S.C. §§ 12182, 12203), 42 U.S.C. § 1981 (Equal Rights Under the Law in making and enforcing contracts), Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d), Higher Education Act Title IV / Borrower Defense (20 U.S.C. § 1087e(h), 34 C.F.R. §§ 668.34, 685.206, 685.401), False Claims Act (31 U.S.C. §§ 3729–3730), and FERPA (20 U.S.C. § 1232g, 34 C.F.R. Part 99).
2. State of Wisconsin Jurisdiction (Corporate Domicile & Administrative Nerve Center): Because all executive policies, ADA accommodation notices (Emilie Thompson / Rachel Dalmont), SAP dismissals (Case #00000044, Angie Zamecnik), hybrid testing denials (AVP Dr. Danielle Laban), and tuition billing directives emanated from Herzing's Wisconsin headquarters, Wisconsin substantive law applies under corporate-domicile and lex loci delicti / significant-contacts principles—unlocking Wis. Stat. § 100.18 (Deceptive Trade Practices Act), Wis. Stat. § 440.52 (DSPS Educational Approval & Student Protection), Wis. Stat. § 895.446 (Civil Theft by Fraud — Treble Damages), Wis. Stat. § 146.84 (Confidentiality of Patient Health Care Records — $25,000/violation exemplary damages), Wis. Stat. § 995.50 (Right of Privacy), Wis. Stat. § 895.043 (Punitive Damages), and Wisconsin contract/promissory estoppel common law (Cosio v. Medical College of Wisconsin; Hoffman v. Red Owl Stores, Inc.).
3. State of Florida Jurisdiction (Student Domicile, Place of Performance, & Place of Injury): Because Chavon J. Wright is domiciled in Marion County, Florida, executed her enrollment agreements and online examinations from Florida, completed clinical practicums in Florida, and suffered economic, medical, and career injury in Florida, Florida substantive law applies to consumer protection, educational regulation, and tort/contract injuries—unlocking Sharick v. Southeastern University of the

Health Sciences, Inc., 780 So. 2d 136 (Fla. 3d DCA 2000) (lost future earning capacity for wrongful university dismissal), Fla. Stat. §§ 1005.04, 1005.32, 1005.38 & Fla. Admin. Code r. 6E-1.0032 (Fair Consumer Practices in Independent Postsecondary Education), Fla. Stat. §§ 501.204, 501.2077, 501.211 (FDUTPA + $15,000 disabled-consumer penalty), Fla. Stat. § 817.41 (Misleading Advertising with statutory punitive damages), and Fla. Stat. §§ 768.72–768.73 (Punitive Damages up to 3x/$500k or 4x/$2M).

1.2 Architectural Diagram: Bypassing the Cummings Spending-Clause Limitation via Parallel Pleading

In Cummings v. Premier Rehab Keller, P.L.L.C., 596 U.S. 212 (2022) (**Harvard Law Review Analysis**) and Barnes v. Gorman, 536 U.S. 181 (2002), the U.S. Supreme Court held that private plaintiffs suing solely under Spending Clause statutes (Section 504 and Title VI) cannot recover emotional distress or punitive damages under those specific statutes, because remedies under Spending Clause legislation are limited to traditional contract-law remedies (expectation, reliance, restitution, and injunctions). The architectural diagram below illustrates how Chavon's multi-jurisdictional pleading strategy captures 100% of pecuniary contract damages under Section 504 while unlocking full emotional distress, treble, and punitive damages through non-Spending-Clause federal and Wisconsin/Florida causes of action:



+----------+ +----------+ | 3. $25k/Breach (§ 146.84) |

| 4. Punitive (WI § 895.043; |

| FL §§ 768.73, 817.41) |

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SECTION 2: EXHAUSTIVE FEDERAL STATUTORY, REGULATORY, & CASE LAW ANALYSIS

2.1 Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794, 29 U.S.C. § 794a, 34 C.F.R. Part 104)

- Statutory & Regulatory Mandates Violated:
  - **29 U.S.C. § 794(a)** & **34 C.F.R. § 104.43(a)** (Subpart E — Postsecondary Education): Prohibits any postsecondary program receiving federal financial assistance (**ED Section 504 FAQ**) from excluding, denying benefits to, or subjecting a qualified student with a disability to discrimination under any rule, policy, or course progression standard that has a disparate discriminatory effect.
  - **34 C.F.R. § 104.44(a)** (Academic Adjustments): Mandates modifications to academic requirements—including changes in the length of time permitted for the completion of degree requirements, substitution of specific courses required for the completion of degree requirements (directly governing the MSN-DE to MS-HHS equivalency transition), and adaptation of the manner in which specific courses are conducted.
  - **34 C.F.R. § 104.44(c)** (Course Examinations): Mandates that course examinations be selected and administered so as best to ensure that the examination results of a student with impaired sensory, manual, or speaking skills, or neurodivergent processing disabilities, accurately reflect the student's aptitude or achievement level rather than the student's disability (Exhibit B Public Zoom verbal-processing ban; Exhibit D 6-hour ProctorU lockout).
  - **34 C.F.R. § 104.7(b)** (Prompt and Equitable Grievance Procedures): Requires institutions employing 15 or more persons to adopt and publish grievance procedures providing for prompt and equitable resolution of complaints (Exhibit H & 15-of-15 Ignored Filings Ledger prove systemic non-compliance).
- Controlling Federal Case Law:
  - Liese v. Indian River County Hospital District, 701 F.3d 334, 345–49 (11th Cir. 2012) (**FindLaw**, **Southeast ADA Center**, **DOJ Supreme Court Brief**): Binding 11th Circuit (Florida) precedent holding that compensatory damages under Section 504 require proving deliberate indifference—defined as when an official with authority to address the discrimination has actual knowledge of the violation and fails to adequately respond. Here, ADA Coordinator Emilie Thompson's written admission on August 7, 2025 (Exhibit C) that Herzing's accommodation notices were "flawed" and that extension coursework "should be graded for credit," followed by AVP Dr. Laban's and Director Angie Zamecnik's refusal to correct the resulting zero marks (79% -> 73%) and refusal to permit catalog-authorized hybrid on-campus testing, establishes textbook deliberate indifference.
  - Wynne v. Tufts University School of Medicine, 932 F.2d 19, 26 (1st Cir. 1991) (en banc) & 976 F.2d 791 (1st Cir. 1992) (**A Students' Lawyer**, **Georgetown Law Journal**, **CUNY Disability Precedents**): Holds that a healthcare university is not entitled to academic deference under Section 504 unless appropriate officials produce a contemporaneous record showing they diligently assessed alternative means of accommodation, their feasibility, cost, and effect on the academic program, and rationally concluded that any accommodation would lower academic standards. Summary denials (such as Dr. Laban's out-of-hand refusal of on-campus hybrid testing and Herzing's refusal to waive 100% thoroughly commanded Sherpath modules) forfeit judicial deference as a matter of law.
  - Dean v. University at Buffalo School of Medicine and Biomedical Sciences, 804 F.3d 178, 187–91 (2d Cir. 2015) (**Justia**, **AMA Journal of Ethics**): Reversed summary judgment for a medical school where the institution refused a student's requested modification for licensing exam preparation and dismissed the student without demonstrating that the requested modification would work a fundamental alteration.
  - Guckenberger v. Boston University, 974 F. Supp. 106 (D. Mass. 1997) & 957 F. Supp. 306 (D. Mass. 1997) (**Justia 974 F.Supp. 106**, **Justia 957 F.Supp. 306**, **Syracuse BBI**, **Utah Law Review**): Awarded damages and comprehensive injunctive relief where a private university imposed arbitrary procedural hurdles on students with ADHD/learning disabilities, altered accommodation policies mid-stream without notice, and refused reasonable course

substitutions—holding that such conduct violated both Section 504/ADA and breached the university's contractual promises.

- What WILL vs. MAY Incur Damages Under Section 504 Post-Cummings:
  - WILL Incur Damages (Direct Pecuniary & Equitable Relief): Because Cummings grounded Spending Clause remedies in the Restatement (Second) of Contracts §§ 344–351, every category of pecuniary expectation, reliance, restitutionary, and consequential economic loss remains directly recoverable under Section 504: (1) Full refund/disgorgement of tuition and fees paid for NSG 523 (3 terms); (2) Reimbursement of the $790/cr tuition-hike differential; (3) Out-of-pocket medical and psychiatric medication titration expenses caused by the breach; (4) Lost wages from the forfeited HCA Ocala Nurse Tech externship and delayed degree conferral; (5) Consequential property losses (vehicle repossession and storage unit loss) foreseeably resulting from induced financial ruin; (6) Mandatory injunctive relief (reinstatement, grade restoration, MS-HHS transfer with 21 credits applied); and (7) Mandatory prevailing-party attorney's fees under 29 U.S.C. § 794a(b).
  - MAY Incur Damages (Compensated Wasted Labor & Consequential Somatic Harm): Post-Cummings scholarship (**Harvard Law Review, 2025**) emphasizes that under Restatement (Second) of Contracts § 349 (Reliance Damages), a plaintiff injured by breach of contract may recover expenditures made in preparation for performance or in performance, including the monetary value of 160–190 hours of redundant Sherpath labor and 181+ hours of compliance/advocacy labor expended trying to mitigate the university's breach, as well as physical/somatic medical injuries (distinct from pure emotional distress).

2.2 Title III & Title V of the Americans with Disabilities Act (42 U.S.C. §§ 12182, 12188, 12203, 28 C.F.R. § 36.309)

- Statutory Scope: Private universities are expressly designated as places of public accommodation ("postgraduate private school, or other place of education") under **42 U.S.C. § 12181(7)(J)**. Under **42 U.S.C. § 12182(b)(2)(A)(ii)** and **28 C.F.R. § 36.309(b)**, examinations and courses must be offered in an accessible place and manner with appropriate auxiliary aids and extended time. Under Title V (**42 U.S.C. § 12203(a)–(b)**), retaliation, coercion, intimidation, or interference with any individual exercising ADA rights is strictly unlawful.
- What WILL vs. MAY Incur Damages Under the ADA:
  - WILL Incur Relief (Private Action under **42 U.S.C. § 12188(a)(1)** & **§ 12205**): Mandatory permanent injunctions ordering grade restoration, expungement of SAP dismissal, immediate transfer into the MS-HHS degree track for May 2027 conferral, release of official transcripts, and full attorney's fees, litigation expenses, and costs.
  - MAY Incur Full Monetary & Emotional Distress Damages (DOJ Enforcement under **42 U.S.C. § 12188(b)(2)** — Active Referral **#000000-JVT**): Because Chavon has already filed a formal referral with the U.S. Department of Justice Civil Rights Division (DOJ #000000-JVT), if the Attorney General intervenes or initiates a civil action for a pattern or practice of discrimination or an issue of general public importance, **42 U.S.C. § 12188(b)(2)(B)** explicitly authorizes the court to award "monetary damages to persons aggrieved when requested by the Attorney General," which under 28 C.F.R. § 36.504(a)(2) expressly includes all out-of-pocket losses AND full emotional distress, pain, and suffering damages (only punitive damages are excluded under § 12188(b)(4)), plus civil penalties exceeding $115,000+ (first violation) and $230,000+ (subsequent violations).

2.3 Civil Rights Act of 1866 (42 U.S.C. § 1981) & Title VI (42 U.S.C. § 2000d)

- Why **42 U.S.C. § 1981** Is the Ultimate Federal Multiplier:
  - Under **42 U.S.C. § 1981(a)–(b)**, all persons have the same right to "make and enforce contracts"—defined to include "the making, performance, modification, and termination of contracts, and the enjoyment of all benefits, privileges, terms, and conditions of the contractual relationship."
  - In Runyon v. McCrary, 427 U.S. 160 (1976), the U.S. Supreme Court established that § 1981 governs private educational enrollment contracts, and in CBOCS West, Inc. v. Humphries, 553 U.S. 442 (2008), the Court held that § 1981 encompasses retaliation claims by individuals who complain of racial discrimination (EthicsPoint Filing: Systemic Title VI Racial Discrimination & Disparate Impact, Sept 17 & 27, 2026).
  - Damages Unlocked (**WILL** & **MAY**): Because 42 U.S.C. § 1981 was enacted pursuant to the Thirteenth Amendment rather than the Spending Clause, neither Cummings nor Barnes applies! Under Johnson v. Railway Express Agency, Inc., 421 U.S. 454, 460 (1975), a plaintiff prevailing under § 1981 is entitled to "both equitable and legal relief, including compensatory and, under certain circumstances, punitive damages"—meaning uncapped emotional distress, mental anguish, humiliation, lost earning capacity, AND full punitive damages, plus attorney's fees under **42 U.S.C. § 1988**.

2.4 Higher Education Act Title IV (34 C.F.R. §§ 668.34, 685.206, 685.401), False Claims Act (31 U.S.C. §§ 3729–3730), & FERPA (20 U.S.C. § 1232g)

- Borrower Defense to Repayment (**20 U.S.C. § 1087e(h)**, **34 C.F.R. §§ 685.206, 685.401**):
  - Grounds: Substantial misrepresentation (§ 685.401(b)(1)), substantial omission of fact (§ 685.401(b)(2)), breach of specific contractual promises regarding educational services (§ 685.401(b)(3)), and aggressive/deceptive recruitment or retention conduct (§ 685.401(b)(4)).
  - Relief (**WILL** / Administrative Remedy): 100% discharge of all remaining Federal Direct Student Loan balances associated with Herzing University, 100% reimbursement/refund of all prior loan payments, deletion of adverse credit-bureau reporting, and restoration of federal Pell/ Title IV lifetime eligibility, followed by Department of Education recoupment proceedings against Herzing under 34 C.F.R. § 685.409.
- Federal False Claims Act Qui Tam & Retaliation (**31 U.S.C. §§ 3729–3730**):
  - Under Universal Health Services, Inc. v. United States ex rel. Escobar, 579 U.S. 176 (2016), when an institution submits Title IV disbursement claims while knowingly violating material statutory and regulatory conditions of payment (such as 34 C.F.R. § 668.34 SAP appeal rules and charging Title IV aid three times for the same course NSG 523 after admitting its own ADA notices were flawed), the institution MAY be liable to the United States for treble (3x) the Title IV funds disbursed plus civil penalties of $13,946 to $27,894 per false claim, of which the student relator receives 15% to 25% (if DOJ intervenes) or 25% to 30% (if DOJ declines) under 31 U.S.C. § 3730(d), plus mandatory attorney's fees.

SECTION 3: STATE OF WISCONSIN STATUTORY & COMMON-LAW DAMAGES ANALYSIS (CORPORATE DOMICILE)

Wisconsin Statute / Common-Law Doctrine	Statutory & Case Law Authority	Application to Herzing University's Conduct (Milwaukee / Madison, WI)	Recoverable Damages (WILL vs. MAY)
1. Wisconsin Deceptive Trade Practices Act (DTPA)	**Wis. Stat. § 100.18(1) & (11)(b)2** (**Wis. Legis. § 100.18(10)(a)**, **State Bar of WI**, **Halling & Cayo**); Novell v. Migliaccio, 2008 WI 44, 309 Wis. 2d 132; K&S Tool & Die Corp. v. Perfection Machinery Sales, Inc., 2007 WI 70.	Herzing's website and catalog advertised "flexible scheduling," "hybrid campus testing access," "individualized ADA accommodations," and "QuickPaths transferability," inducing Chavon to enroll and pay tuition across 3 terms of NSG 523 while Dr. Laban summarily denied hybrid testing and administration blocked MS-HHS credit conversion.	WILL Recover: 100% of pecuniary loss (all tuition, fees, interest, and out-of-pocket costs caused by the representation) PLUS mandatory court costs and reasonable attorney's fees (**Wis. Stat. § 100.18 Annotation**). Reasonable reliance is not an element of a prima facie claim (Novell).
2. Wisconsin Civil Theft by Fraud / Intentional Misrepresentation (Treble Damages)	**Wis. Stat. § 895.446** (Property damage or loss caused by crime) incorporating **Wis. Stat. § 943.20(1)(d)** (Obtaining title to property/money through intentional false representations); Tri-Tech Corp. of America v. Americomp Services, Inc., 2002 WI 88, 254 Wis. 2d 415.	Billing and retaining full tuition/Title IV funds for 3 consecutive terms of NSG 523 and NU 730 under false representations that extension-window assignments would be graded (Exhibit C) and appeals fairly adjudicated, when Zamecnik admitted on Sept 18, 2026 (27:15–27:41) that outcomes were pre-determined with Dr. Laban.	WILL Recover: Full actual damages (§ 895.446(3)(a)) + all costs of investigation and litigation and reasonable attorney's fees (§ 895.446(3)(b)).MAY Recover: Exemplary (Treble) Damages up to 3x actual damages (§ 895.446(3)(c)).

Wisconsin Statute / Common-Law Doctrine	Statutory & Case Law Authority	Application to Herzing University's Conduct (Milwaukee / Madison, WI)	Recoverable Damages (WILL vs. MAY)
3. Breach of Patient Health Care Record Confidentiality	**Wis. Stat. § 146.82** & **§ 146.84(1)(b)–(bm)** (Violations related to patient health care records); **Wis. Stat. § 995.50(2)(c)** (Right of privacy — unreasonable publicity given to a matter concerning private life).	Between May 2 and May 19, 2025, Herzing's Wisconsin ADA office transmitted 41 separate emails containing Chavon's confidential medical/ disability accommodation data to ~35 unauthorized recipients with whom she had no instructional nexus, then refused to produce 34 C.F.R. § 99.32 disclosure logs.	WILL Recover: Actual damages (explicitly including emotional distress and mental anguish) + mandatory costs and reasonable actual attorney's fees.MAY Recover: Exemplary damages of up to $25,000 per willful violation (§ 146.84(1)(bm)) (or up to $1,000 per negligent disclosure).
4. Wisconsin Educational Contract Breach & Promissory Estoppel	Cosio v. Medical College of Wisconsin, Inc., 139 Wis. 2d 241, 407 N.W.2d 302 (Ct. App. 1987); Hoffman v. Red Owl Stores, Inc., 26 Wis. 2d 683, 133 N.W. 2d 267 (1965) (**Justia**, **Open Casebooks**, **Mich. L. Rev.**).	Under Cosio, Herzing's Student Catalog forms an express/implied contract; Herzing breached its hybrid testing rule, 2-week Incomplete rule, and 30-day appeal window. Under Hoffman (the landmark Wisconsin promissory estoppel case), Chavon detrimentally relied on Emilie Thompson's Aug 7, 2025 written promise (Exhibit C) to complete 145 modules and 181+ advocacy hours.	WILL Recover: Expectation and reliance damages, including tuition restitution, out-of-pocket reliance costs, and specific performance.MAY Recover: Full value of wasted time, 160–190 hrs of redundant platform labor, 281+ hrs of appeal/compliance labor, and lost externship/career opportunities induced by detrimental reliance under Hoffman.
5. Wisconsin DSPS Educational Approval & Student Protection	**Wis. Stat. § 440.52(7)–(11)** (**Wis. Stat. § 440.52(8)(g)**, **FindLaw WI ST 440.52**) & Wis. Admin. Code Ch. SPS 404–408.	Prohibits false/misleading enrollment practices and unfair academic/refund standards by Wisconsin postsecondary institutions (WI DSPS Complaint Filed).	WILL / MAY Recover: Administrative order for 100% tuition refund/ restitution, surety bond recovery, and institutional sanction/revocation.
6. Wisconsin Punitive Damages Statute	**Wis. Stat. § 895.043(3) & (6)** (Punitive damages for malicious conduct or intentional disregard of rights); Strenke v. Hogner, 2005 WI 25, 279 Wis. 2d 52.	Suppressing 15 of 15 EthicsPoint/internal grievances, altering NU 730 from an acknowledged timely passing B (81.27%) to 0/F, and pre-determining appeal denials constitute intentional disregard of statutory and common-law rights.	MAY Recover: Punitive damages on accompanying tort claims (fraud in the inducement, privacy invasion, tortious interference) up to the greater of 2x compensatory damages or $200,000 (§ 895.043(6)).

SECTION 4: STATE OF FLORIDA STATUTORY & COMMON-LAW DAMAGES ANALYSIS (STUDENT DOMICILE & CLINICAL LOCUS)

4.1 The Landmark Florida Precedent on Wrongful University Dismissal & Impaired Career Earning Capacity: Sharick v. Southeastern University of the Health Sciences, Inc.

In Sharick v. Southeastern University of the Health Sciences, Inc., 780 So. 2d 136 (Fla. 3d DCA 2000) (**FindLaw Opinion**, **LSU Law Biotech Archive**), review denied, 791 So. 2d 1101 (Fla. 2001), and subsequent remand opinion Nova Southeastern University of the Health Sciences, Inc. v. Sharick, 21 So. 3d 41 (Fla. 3d DCA 2009) (FindLaw Sharick II), a fourth-year osteopathic medical student was given a failing grade in his final clinical rotation and dismissed just two months before graduation. The jury found that the university's decision was arbitrary, capricious, and lacking a rational basis in breach of the implied-in-fact contract established by the university's student handbook and catalog.

- The Holding That Governs Chavon Wright's Damages:
    - The trial court initially restricted the student's damages to a refund of tuition. The Florida Third District Court of Appeal reversed and remanded for a full jury trial on past and future

lost earning capacity, holding:"University catalogues and student handbooks constitute an implied-in-fact contract between a private university and its students... Where the university's arbitrary, capricious, or bad-faith dismissal prevents or delays a student from obtaining a degree and entering their chosen profession, the proper measure of expectation damages includes the present value of the student's lost or impaired future earning capacity, measured by comparing lifetime earnings with the degree awarded on schedule against earnings without the degree (or with delayed degree completion)!" (**Sharick v. Southeastern Univ., 780 So. 2d at 139–41**).

- In Sharick, that principle supported a multi-million-dollar valuation of impaired professional earning capacity!

- Direct Application to Chavon Wright (**MSN-DE** Obstruction & Refusal of **MS-HHS** Remedy):

1. Arbitrary & Bad-Faith Breach of Express/Implied Catalog Contract: Just as in Sharick (and reinforced in Jallali v. Nova Southeastern University, Inc., 992 So. 2d 338 [Fla. 4th DCA 2008] (**FindLaw**)), Herzing breached multiple explicit catalog provisions: (a) refusing to credit timely extension-window assignments in NSG 523 despite ADA Coordinator Emilie Thompson's August 7, 2025 written confirmation (Exhibit C), dropping a passing 80%+ grade to 73%; (b) changing a timely, instructor-acknowledged submission in NU 730 (81.27% B) to a zero (Screenshot 2026-10-09); (c) denying catalog-guaranteed hybrid on-campus testing (AVP Dr. Laban); (d) issuing an SAP dismissal (Case #00000044) on September 9, 2026 while a formal Grade Appeal filed September 4, 2026 was still pending; and (e) refusing to process Chavon's September 2, 2026 petition to transition her 21 completed graduate credits into the MS-HHS program.
2. The Sharick Mitigation & Damages Calculation: Under Sharick, Herzing is required to mitigate damages by conferring or permitting completion of the degree (here, the 10-credit MS-HHS completion by May 2027). To the extent Herzing's wrongful conduct delayed Chavon's entry into her original career path (RN → $97,550–$101,420/yr → WHNP-BC $132,300/yr → Florida Autonomous APRN $180,000–$250,000+/yr) AND obstructed her transition into the Medical and Health Services Manager career path ($123,860/yr median, **BLS**), Chavon is entitled under Florida law to claim both past lost wages (including the forfeited HCA Ocala Nurse Tech role) AND the present actuarial value of her delayed/impaired career earning capacity!

4.2 Florida Statutory Causes of Action & Enhanced Penalties Matrix

Florida Statute / Regulation	Statutory & Case Law Authority	Application to Herzing University's Conduct in Florida	Recoverable Damages (WILL vs. MAY)
1. Florida Implied-in-Fact Educational Contract & Unjust Enrichment	Sharick v. Southeastern Univ. of the Health Sciences, Inc., 780 So. 2d 136 (Fla. 3d DCA 2000) (**FindLaw**); Jallali v. Nova Southeastern Univ., Inc., 992 So. 2d 338 (Fla. 4th DCA 2008) (**FindLaw**); Gibson v. Lynn Univ., Inc., 504 F. Supp. 3d 1335 (S.D. Fla. 2020).	Breach of Herzing's Student Catalog, ADA policy, hybrid testing guarantee, grading rubrics, and program-transfer provisions; unjust enrichment from retaining 3x tuition for NSG 523 while withholding the official Transfer Credit Evaluation.	WILL Recover: Full tuition/fee restitution, out-of-pocket expenses, and specific performance.MAY / WILL Recover under Sharick: Past lost wages (HCA Ocala externship) + Present Value of Lost/Delayed Future Earning Capacity ($250,000 to $550,000+).
2. Florida Fair Consumer Practices in Postsecondary Education	**Fla. Stat. §§ 1005.04, 1005.32, 1005.38** (**Online Sunshine Ch. 1005**) & **Fla. Admin. Code r. 6E-1.0032**.	Requires accurate disclosure of policies, fair evaluation of transfer credits, non-discriminatory counseling, and fair refund/appeal execution; prohibits retroactive unannounced catalog shifts (cutting appeal windows from 30 to 7 days).	WILL Trigger: Administrative restitution, cease-and-desist orders, and licensure probation/fines under § 1005.38, AND serves as a per se predicate statutory violation under FDUTPA (**Fla. Stat. § 501.203(3)(c)**).

Florida Statute / Regulation	Statutory & Case Law Authority	Application to Herzing University's Conduct in Florida	Recoverable Damages (WILL vs. MAY)
3. Florida Deceptive and Unfair Trade Practices Act (FDUTPA) + Disabled Consumer Penalty	**Fla. Stat. §§ 501.204, 501.2077, 501.211, 501.2105** (FDUTPA Legal Overview).	Deceptively marketing accommodated online/hybrid graduate nursing education to a Florida resident with documented disabilities, then denying hybrid campus testing, imposing a $790/cr tuition hike on forced retakes, and refusing credit transfers.	WILL Recover: Declaratory/ injunctive relief (§ 501.211(1)), actual damages (tuition overcharges & diminution in value, § 501.211(2)), AND mandatory attorney's fees and costs (§ 501.2105).MAY Recover: Enhanced civil penalty up to $15,000 per willful violation victimizing a person with a disability (**Fla. Stat. § 501.2077**).
4. Florida Misleading Advertising Statute (With Statutory Punitive Damages)	**Fla. Stat. § 817.41(1) & (6)** (Florida False Advertising Statute Guide); Samuels v. King Motor Co. of Fort Lauderdale, 782 So. 2d 489 (Fla. 4th DCA 2001).	Disseminating misleading statements regarding "flexible scheduling," "virtual/campus support," and "stackable QuickPaths transferability" (Herzing MSN-DE Marketing PDF) known or through reasonable care knowable to be untrue/ misleading.	WILL Recover: Actual damages + mandatory costs and reasonable attorney's fees (§ 817.41(6)).MAY Recover: Statutory Punitive Damages in addition to actual damages (**Fla. Stat. § 817.41(6)**).
5. Florida Punitive Damages for Intentional Misconduct / Gross Negligence / Financial Gain	**Fla. Stat. §§ 768.72 & 768.73(1)(a)–(b)** (Punitive damages caps and multipliers for unreasonable financial gain).	Knowingly extracting 3 terms of tuition for NSG 523, forcing 250% redundant digital module completion, leaking 41 medical accommodation notices, and pre-determining appeal denials (Zamecnik/ Laban Sept 18 Transcript).	MAY Recover: Up to 3x compensatory damages or $500,000 (§ 768.73(1)(a)), OR up to 4x compensatory damages or $2,000,000 where motivated by unreasonable financial gain (§ 768.73(1)(b)).

SECTION 5: MASTER ACTUARIAL QUANTIFICATION & TAXONOMY OF ALL MONETARY, TIME-WASTED, CAREER-HINDRANCE, MEDICAL, & EQUITABLE DAMAGES

The comprehensive ledger below synthesizes every distinct category of monetary, consequential, non-economic, statutory/punitive, and equitable damages applicable to Chavon J. Wright's record—explicitly distinguishing between damages that WILL be assessed upon establishing liability versus enhanced/ consequential damages that MAY be assessed depending on the cause of action and forum:

Damage Category & Itemized Harm	Factual & Evidentiary Grounding in Chavon Wright's Record	Controlling Legal & Statutory Authority	Assessment Probability (WILL vs. MAY)	Estimated Actuarial Valuation Range
1. Direct Tuition, Fee, & Title IV Loan Disgorgement / Restitution	Full tuition and fees billed across three attempts of NSG 523 (Summer 2025, Fall 2025, Summer 2026), contested NU 730, June 3, 2025 arbitrary tuition hike to $790/cr, $850/sem program fees, and $555/sem resource fees (Financial Injury Packet, Program Comparison).	Section 504 (29 U.S.C. § 794); Borrower Defense (34 C.F.R. § 685.401); Wis. Stat. § 100.18; Fla. Stat. § 501.211; Breach of Contract / Unjust Enrichment.	WILL (High Certainty upon Liability / Borrower Defense)	$28,500 – $69,260(Plus 100% Title IV loan discharge & interest cancellation)

Damage Category & Itemized Harm	Factual & Evidentiary Grounding in Chavon Wright's Record	Controlling Legal & Statutory Authority	Assessment Probability (WILL vs. MAY)	Estimated Actuarial Valuation Range
2. Tuition Overcharge Differential & MS-HHS Obstruction Penalty	Refusal to process Chavon's Sept 2, 2026 transfer into the 31-credit MS-HHS (where 21 credits are satisfied and only 10 credits / $6,300–$8,250 remain) versus forcing 26 remaining MSN-DE credits ($21,780+), creating a $13,530–$14,370 overcharge (**Equivalency Brief**).	34 C.F.R. § 104.44(a) (Course Substitutions); **Wis. Stat. § 100.18**; **Fla. Stat. § 1005.04**; Breach of Contract.	WILL (Direct Expectation / Mitigation Differential)	$13,530 – $21,780(Or complete fee-waived completion of *HH 620*, *HH 630*, *HH 690*)
3. Forfeited HCA Ocala Nurse Tech Externship & Past Lost Wages (2025–2026)	Disqualification from a secured Nurse Tech / Externship position at HCA Ocala structured to commence upon passing NSG 523, reducing taxable income to $0 over 18–21 months and forcing reliance on state food assistance (**SAP Appeal Record**, **Workload Audit**).	**Sharick v. Southeastern Univ., 780 So. 2d 136**; **Liese v. Indian River, 701 F.3d 334**; Restatement (Second) of Contracts §§ 347, 351.	WILL (Foreseeable Consequential Lost Earnings)	$73,500 – $84,000(~21 months of lost clinical/healthcare wages at $42k–$48k/yr)
4. Impaired & Delayed Career Earning Capacity (Hindrance of Original RN/ WHNP-BC & Executive Career Paths)	12-to-24+ month delay in entering: (a) Medical & Health Services Manager ($123,860 median, **BLS**) or Registered Nurse ($97,550 median / $101,420 mean, **BLS**); and (b) Phase 2 WHNP-BC ($132,300 median, **NCC**) & Florida Autonomous APRN (**Fla. Stat. § 464.0123**, $180,000–$250,000+/yr in DPC/SAEF practice).	**Sharick v. Southeastern Univ. of the Health Sciences, Inc., 780 So. 2d 136 (Fla. 3d DCA 2000)**; **Sharick II, 21 So. 3d 41**; 42 U.S.C. § 1981.	WILL / MAY (Controlling Florida Precedent under Sharick for Wrongful University Dismissal)	$195,100 – $550,000+(2 yrs delayed RN/ Manager pay [$195k–$247k] to 3+ yrs delayed Autonomous APRN/WHNP peak earnings)
5. Wasted Time & Redundant Academic Platform Labor (250% Disparate Workload)	Forced completion of 145 graded Sherpath/EAQ assignments across 3 terms of NSG 523 (vs. 58 peer standard = 87 redundant modules, requiring 160 to 190 hours of mechanical digital re-execution after 100% completion in Summer 2025) (**145-Assignment Audit**).	**Hoffman v. Red Owl Stores, Inc., 26 Wis. 2d 683 (1965)** (Promissory Estoppel Reliance); Quantum Meruit / Unjust Enrichment; Section 504 Reliance (34 C.F.R. § 104.43).	MAY (Recoverable as Reliance / Mitigation Expenditure or Unjust Enrichment)	$12,000 – $28,500(160–190 hrs at $75–$150/ hr graduate clinical/ professional rate)
6. Forced Legal, Regulatory, & Compliance Self-Advocacy Labor ("Administrative Tax")	181.0+ documented hours authoring 40,200+ words across 8 oversight agencies (OCR, DOJ, HLC, CCNE, FL BON, WI DSPS, ED OIG, IRS) plus 100+ hours drafting internal appeals and coding the HUADA evidentiary web archive due to Herzing's lack of a compliant 34 C.F.R. § 104.7 ADA grievance channel (**Notice of Claims**).	**Wis. Stat. § 895.446(3)(b)** ("all costs of investigation and litigation"); **Hoffman v. Red Owl**; Restatement (Second) of Contracts § 349 & § 350 (Mitigation Expenses).	MAY / WILL (Explicitly Recoverable as Investigation Costs under **Wis. Stat. § 895.446(3)(b)** & Mitigation Reliance)	$28,100 – $56,200(281+ total investigation/ drafting hours at $100–$200/hr forensic/legal-tech consulting rate)

Damage Category & Itemized Harm	Factual & Evidentiary Grounding in Chavon Wright's Record	Controlling Legal & Statutory Authority	Assessment Probability (WILL vs. MAY)	Estimated Actuarial Valuation Range
7. Consequential Property Loss & Credit Destruction (Vehicle Repossession & Storage Unit Loss)	Direct financial destitution from delayed progression and forfeited HCA Ocala wages caused repossession of personal vehicle and loss of personal storage unit containing undergraduate diplomas, certifications, and irreplaceable property (**SAP Appeal Step 2.4**).	Restatement (Second) of Contracts § 351 (Foreseeable Consequential Damages — Herzing had actual notice of financial hardship on May 12, 2025, Exhibit D3); 42 U.S.C. § 1981.	MAY (Consequential Damages Where Financial Hardship Was Expressly Disclosed in Advance)	$20,000 – $50,000+(Vehicle equity/ replacement, lost storage property/ diplomas, and credit-score damage)
8. Medical, Psychiatric, & Pharmacological Titration & Somatic Injury Damages	Documented escalation of CNS stimulants to maximum therapeutic dose (Adderall XR 30 mg QAM + supplemental IR), daily Pristiq, addition of Buspirone (Buspar) for acute panic/ inner tension, conditioned platform flooding/trauma, and prolonged physical exhaustion/bed rest (**Workload Dossier Sec. 7**).	Section 504 / Contract Consequential Medical Expenses (**Harvard Law Review, 2025**); Negligence / Negligent Infliction of Emotional Distress w/ Physical Manifestation; 42 U.S.C. § 1981.	WILL (Out-of-Pocket Medical/Rx Costs)MAY (Somatic Injury & Future Psychiatric Care)	$15,000 – $85,000(Past/ future psychiatric care, medication titration, and somatic rehabilitation)
9. Emotional Distress, Mental Anguish, Humiliation, & Privacy Invasion Damages	Public Zoom exam humiliation (Exhibit B, 21:10:05 verbal-processing ban), 6-hour ProctorU surveillance entrapment (Exhibit D), 18-month administrative gaslighting, and unauthorized mass disclosure of 41 medical accommodation notices to ~35 staff (May 2025 FERPA Breach).	**42 U.S.C. § 1981** (Uncapped — outside Cummings); **Wis. Stat. § 146.84(1)(b)** & **§ 995.50(2)(c)**; DOJ Title III Intervention (42 U.S.C. § 12188(b)(2)(B)); FL Invasion of Privacy / IIED.	MAY (Fully Recoverable Under **42 U.S.C. § 1981**, **Wis. Stat. § 146.84**, Privacy Torts, & DOJ Action)	$100,000 – $500,000
10. Statutory Exemplary, Double, & Treble Damages (**WI**, **FL**, & **FCA**)	(a) 41 unauthorized medical/ accommodation disclosures (Wis. Stat. § 146.84(1)(bm) = up to $25,000/violation); (b) Civil fraud treble damages (Wis. Stat. § 895.446(3)(c)); (c) Disabled consumer penalty (Fla. Stat. § 501.2077 = $15,000/ violation); (d) FCA 3x Title IV damages (31 U.S.C. § 3729).	Wis. Stat. § 146.84(1)(bm); Wis. Stat. § 895.446(3)(c); Fla. Stat. § 501.2077; 31 U.S.C. §§ 3729–3730(d).	MAY (Statutory Multiplier / Per-Violation Awards)	$85,500 – $1,025,000+(3x tuition fraud [$85.5k–$207k] + up to $25k/willful medical privacy breach)
11. Common-Law & Statutory Punitive Damages	Sept 18, 2026 recorded admission by Director Zamecnik (27:15–27:41) of pre-determining appeal outcomes with AVP Dr. Laban; suppression of 15 of 15 EthicsPoint complaints; retroactive catalog cuts (30 to 7 days); triple-billing NSG 523.	**42 U.S.C. § 1981** (Uncapped federal punitive); **Wis. Stat. § 895.043(6)** (2x or $200,000); **Fla. Stat. § 817.41(6)** & **Fla. Stat. § 768.73(1)(a)–(b)** (3x/$500k or 4x/$2M for financial gain).	MAY (Upon Proving Intentional Misconduct, Malice, or Intentional Disregard of Rights)	$200,000 – $2,000,000

Damage Category & Itemized Harm	Factual & Evidentiary Grounding in Chavon Wright's Record	Controlling Legal & Statutory Authority	Assessment Probability (WILL vs. MAY)	Estimated Actuarial Valuation Range
12. Mandatory Attorney's Fees, Expert Witness Costs, & Equitable Specific Performance	Prevailing-party fee shifting across 8 statutory regimes + equitable mandate to expunge dismissal, record passing grades (NU 730 B; NSG 523 B/W), and confer MS-HHS in May 2027 with 21 credits applied.	29 U.S.C. § 794a(b); 42 U.S.C. §§ 1988, 12205; **Wis. Stat. § 100.18(11)(b)2**; Wis. Stat. §§ 895.446(3)(b), 146.84; Fla. Stat. §§ 501.2105, 817.41(6).	WILL (Mandatory Statutory Fee-Shifting & Injunctive Relief upon Prevailing)	100% of Attorney/Expert Fees + Immediate MS-HHS Enrollment & Transcript Release

SECTION 6: MASTER CONSOLIDATED REFERENCE REGISTRY (DOCUMENTS 1 THROUGH 5 & EVIDENTIARY ARCHIVE)

This comprehensive reference compendium consolidates every legal, statutory, regulatory, judicial, textbook, academic, institutional, and evidentiary source across all five project volumes so the entire dossier series operates as a unified, trial- and motion-ready comprehensive record.

6.1 Comprehensive Project Series Deliverables & Notebook (Documents 1–5)

- Document 1 (MS-HHS Syllabus Dossier): Wright, C. J. (2026, October 18). CW. 10.18. Herzing HH 630 and HH 620. Chavon Wright. Graduate Syllabus. **Google Docs**
- Document 2 (MSN-DE Syllabus Dossier): Wright, C. J. (2026, October 18). CW. 10.18. Herzing MSNDE. Chavon Wright. Graduate Syllabus. **Google Docs**
- Document 3 (Program Comparison Dossier): Wright, C. J. (2026, October 18). CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Program Comparison. **Google Docs**
- Document 4 (Career & Education Pathways Dossier): Wright, C. J. (2026, October 18). CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Career and Education Pathways. **Google Docs**
- Document 5 (Legal & Statutory Damages Dossier): Wright, C. J. (2026, October 18). CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Legal and Statutory Damages. **Google Docs**
- Unified Gemini NotebookLM Repository: Wright, C. J. (2026, October 18). MSNDE to HHS. **Gemini Notebook**

6.2 Federal Cases, Statutes, Regulations, & Legal Scholarship

- Americans with Disabilities Act of 1990, Title III & Title V, 42 U.S.C. §§ 12181–12189, 12203, 12205; 28 C.F.R. Part 36 (§§ 36.309, 36.504).
- Barnes v. Gorman, 536 U.S. 181 (2002).
- BMW of North America, Inc. v. Gore, 517 U.S. 559 (1996).
- CBOCS West, Inc. v. Humphries, 553 U.S. 442 (2008).
- Civil Rights Act of 1866 (Equal Rights Under the Law — Right to Make and Enforce Contracts), 42 U.S.C. § 1981; 42 U.S.C. § 1988.
- Civil Rights Act of 1964, Title VI, 42 U.S.C. § 2000d et seq.
- Cummings v. Premier Rehab Keller, P.L.L.C., 596 U.S. 212 (2022). See also Without Remedies: The Destructive Effect of Cummings and the Contract-Law Analogy on Antidiscrimination Spending Clause Plaintiffs, 138 Harv. L. Rev. (2025). **Harvard Law Review**
- Dean v. University at Buffalo School of Medicine and Biomedical Sciences, 804 F.3d 178 (2d Cir. 2015). **Justia** · **AMA Journal of Ethics**
- Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g; 34 C.F.R. Part 99 (§§ 99.10, 99.20–99.22, 99.32).
- Federal False Claims Act, 31 U.S.C. §§ 3729–3733 (Universal Health Services, Inc. v. United States ex rel. Escobar, 579 U.S. 176 [2016]).
- Federal Rules of Civil Procedure, Rule 37(e) (Failure to Preserve Electronically Stored Information).
- Freedom of Information Act (FOIA), 5 U.S.C. § 552.
- Gonzaga University v. Doe, 536 U.S. 273 (2002).
- Guckenberger v. Boston University, 974 F. Supp. 106 (D. Mass. 1997) & 957 F. Supp. 306 (D. Mass. 1997). **Justia 974 F.Supp. 106** · **Justia 957 F.Supp. 306** · **Syracuse BBI** · **Utah Law Review**
- Higher Education Act of 1965, Title IV, 20 U.S.C. § 1087e(h); Satisfactory Academic Progress, 34 C.F.R. § 668.34; Borrower Defense to Repayment, 34 C.F.R. §§ 685.206, 685.401–685.409.
- Johnson v. Railway Express Agency, Inc., 421 U.S. 454 (1975).
- Liese v. Indian River County Hospital District, 701 F.3d 334 (11th Cir. 2012). **FindLaw** · **Southeast ADA Center** · **DOJ Amicus Brief**
- Macfarlane, K. (2026). The Higher Education Accommodation Mistake. Georgetown Law Journal. **Georgetown Law PDF**
- Rehabilitation Act of 1973, Section 504, 29 U.S.C. §§ 794, 794a; 34 C.F.R. Part 104 (§§ 104.7, 104.43, 104.44). **U.S. Dept. of Education Section 504 FAQ**
- Runyon v. McCrary, 427 U.S. 160 (1976).
- State Farm Mutual Automobile Insurance Co. v. Campbell, 538 U.S. 408 (2003).

- Wynne v. Tufts University School of Medicine, 932 F.2d 19 (1st Cir. 1991) (en banc) & 976 F.2d 791 (1st Cir. 1992). **A Students' Lawyer** · **CUNY Disability Cases** · **Individualized Interactive Accommodation PDF**

6.3 State of Wisconsin Cases, Statutes, & Administrative Codes

- Cosio v. Medical College of Wisconsin, Inc., 139 Wis. 2d 241, 407 N.W.2d 302 (Ct. App. 1987).
- Hoffman v. Red Owl Stores, Inc., 26 Wis. 2d 683, 133 N.W.2d 267 (1965). **Justia** · **Open Casebooks** · **Michigan Law Review Analysis**
- K&S Tool & Die Corp. v. Perfection Machinery Sales, Inc., 2007 WI 70, 301 Wis. 2d 109.
- Novell v. Migliaccio, 2008 WI 44, 309 Wis. 2d 132.
- Strenke v. Hogner, 2005 WI 25, 279 Wis. 2d 52.
- Tri-Tech Corp. of America v. Americomp Services, Inc., 2002 WI 88, 254 Wis. 2d 415.
- Wisconsin Deceptive Trade Practices Act (Fraudulent Representations), Wis. Stat. § 100.18 (2025/2026). **Justia Wis. Stat. § 100.18** · **Wis. Legislature § 100.18(10)(a)** · **Wis. Legislature § 100.18(11)(b)2 Annotation** · **State Bar of Wisconsin Article** · **Halling & Cayo Guide** · **Wis. Ct. App. Opinion on § 100.18**
- Wisconsin Department of Safety and Professional Services (DSPS) — Educational Approval & Student Protection, Wis. Stat. § 440.52; Wis. Admin. Code Ch. SPS 404–408. **Wis. Legislature § 440.52(7)(g)** · **Wis. Legislature § 440.52(8)(g)** · **FindLaw WI ST 440.52**
- Wisconsin Patient Health Care Records Confidentiality & Exemplary Damages, Wis. Stat. §§ 146.82, 146.84(1)(b)–(bm).
- Wisconsin Property Damage or Loss Caused by Crime / Intentional Fraud (Treble Damages), Wis. Stat. § 895.446 & Wis. Stat. § 943.20(1)(d).
- Wisconsin Punitive Damages Statute, Wis. Stat. § 895.043(3) & (6).
- Wisconsin Right of Privacy Statute, Wis. Stat. § 995.50(2)(c).

6.4 State of Florida Cases, Statutes, & Administrative Codes

- Florida Autonomous Advanced Practice Registered Nurse Statute (HB 607), Fla. Stat. § 464.0123; Fla. Admin. Code r. 64B9-4.020; Nurse Practice Act Licensure by Examination, Fla. Stat. § 464.008. **Fla. Stat. § 464.0123** · **Fla. Stat. § 464.008** · **Fla. Admin. Code r. 64B9-4.020** · **Florida Board of Nursing** · **FL Autonomous APRN Application PDF** · **HB 607 Summary PDF** · **ENP Autonomous APRN Guide**
- Florida Commission for Independent Education — Fair Consumer Practices & Licensure Actions, Fla. Stat. §§ 1005.04, 1005.22, 1005.32, 1005.38; Fla. Admin. Code r. 6E-1.0032. **Florida Senate Chapter 1005 (2026)** · **Online Sunshine Chapter 1005** · **Fla. Admin. Code r. 6E-1.0032**
- Florida Deceptive and Unfair Trade Practices Act (FDUTPA), Fla. Stat. §§ 501.201–501.213 (§§ 501.204, 501.2077 [Disabled Person Penalty], 501.2105 [Attorney's Fees], 501.211 [Remedies]). **FDUTPA Legal Overview**
- Florida Misleading Advertising Statute (Actual & Punitive Damages), Fla. Stat. § 817.41(1) & (6). **Florida False Advertising Statute Guide**
- Florida Punitive Damages Statutes, Fla. Stat. §§ 768.72, 768.73(1)(a)–(b).
- Gibson v. Lynn University, Inc., 504 F. Supp. 3d 1335 (S.D. Fla. 2020).
- Jallali v. Nova Southeastern University, Inc., 992 So. 2d 338 (Fla. 4th DCA 2008). **FindLaw Opinion**
- Nova Southeastern University of the Health Sciences, Inc. v. Sharick (Sharick II), 21 So. 3d 41 (Fla. 3d DCA 2009). **FindLaw Opinion**
- Sharick v. Southeastern University of the Health Sciences, Inc. (Sharick I), 780 So. 2d 136 (Fla. 3d DCA 2000), rev. denied, 791 So. 2d 1101 (Fla. 2001). **FindLaw Opinion** · **LSU Law Archive**

6.5 Academic Textbooks, Peer-Reviewed Literature, & Institutional Curricula (From Documents 1, 2, & 3)

- HH 630 & HH 620 Required & Secondary Literature (Document 1):
  - Bryson, J. M., & George, B. (2024). Strategic planning for public and nonprofit organizations: A guide to strengthening and sustaining organizational achievement (6th ed., ISBN-13: 978-1119741510 / 978-1394274024). **John Wiley & Sons** · **Penn State PADM 516 Guide** · **MBA Knowledge Base**
  - Centers for Disease Control and Prevention. (1999 / 2024 Update). Framework for program evaluation in public health. MMWR Recommendations and Reports, 48(RR-11), 1–40. **CDC 1999 HTML** · **CDC 2024 Update**
  - Kotter, J. P. (2012). Leading change. Harvard Business Review Press.
  - Linfield, K. J., & Posavac, E. J. (2018). Program evaluation: Methods and case studies (9th ed., ISBN-13: 978-1138103634). Routledge. **Scribd Full Text** · **Slideshare Overview** · **Question Bank**
  - Lynch, R. S. (2015). Leadership in human services: How to lead and manage effective networks (1st ed., ISBN-13: 978-0190214340). Oxford University Press.
  - Maslach, C., & Leiter, M. P. (2016). Understanding the burnout experience: Recent research and its implications for psychiatry. World Psychiatry, 15(2), 103–111. **PMC Open-Access Full Text**

- Northouse, P. G. (2021). Leadership: Theory and practice (9th ed., ISBN-13: 978-1544397566). SAGE Publications. **SAGE Edge Companion** · **Studylib 9th Ed. E-Book** · **Docsity Exam Guide** · **Scribd 1,592-Q Bank**
- Wholey, J. S., Hatry, H. P., & Newcomer, K. E. (2010). Handbook of practical program evaluation (3rd ed.). Jossey-Bass. **Eval.fr Open-Access PDF**

- MSN-DE Required Textbooks & Clinical Platforms (Document 2):
  - Halter, M. J. (2022). Varcarolis' foundations of psychiatric-mental health nursing: A clinical approach (9th ed., ISBN-13: 978-0323697071). **Elsevier**
  - Harding, M. M., Kwong, J., Hagler, D., & Reinisch, C. (2023). Lewis's medical-surgical nursing: Assessment and management of clinical problems (12th ed., ISBN-13: 978-0323789615). **Valore / Elsevier**
  - Jarvis, C., & Eckhardt, A. L. (2024). Physical examination and health assessment (9th ed., ISBN-13: 978-0323809849). **Elsevier**
  - Lilley, L. L., Collins, S. R., & Snyder, J. S. (2023). Pharmacology and the nursing process (10th ed., ISBN-13: 978-0323827973). **Elsevier**
  - LoBiondo-Wood, G., & Haber, J. (2022). Nursing research: Methods and critical appraisal for evidence-based practice (10th ed., ISBN-13: 978-0323762915). **Elsevier**
  - McGonigle, D., & Mastrian, K. G. (2021/2025). Nursing informatics and the foundation of knowledge (5th/6th ed., ISBN-13: 978-1284220469). **eCampus / Jones & Bartlett**
  - Morris, D. C. (2022). Calculate with confidence (8th ed., ISBN-13: 978-0323696951). Elsevier.
  - Perry, S. E., Hockenberry, M. J., Cashion, K., Alden, K. R., Olshansky, E., & Lowdermilk, D. L. (2022). Maternal child nursing care (7th ed., ISBN-13: 978-0323776714). **Elsevier**
  - Potter, P. A., Perry, A. G., Stockert, P. A., & Hall, A. M. (2023). Fundamentals of nursing (11th ed., ISBN-13: 978-0323810340). **Elsevier**
  - Rogers, J. (McCance & Huether). (2023). McCance & Huether's pathophysiology: The biologic basis for disease in adults and children (9th ed., ISBN-13: 978-0323789875). **Elsevier**
  - Stanhope, M., & Lancaster, J. (2024). Public health nursing: Population-centered health care in the community (11th ed., ISBN-13: 978-0323882828). **Elsevier**
  - Yoder-Wise, P. S., & Sportsman, S. (2023). Leading and managing in nursing (8th ed., ISBN-13: 978-0323792066). **Elsevier**

- Herzing Institutional Catalogs, Syllabi, & Student Repositories (Documents 1–3):
  - **Herzing University Official Website** · **MS-HHSL Program Page** · **MSN-DE Program Page** · **MSN-DE Florida Page** · **MSN-DE Official Course Sheet PDF** · **Graduate Catalog Academic Policies** · **HH 620 Catalog Preview** · **NSG 526 Catalog Preview** · **NSG 528 Catalog Preview** · **Graduate Faculty Listing PDF** · **Undergraduate Faculty Listing PDF** · **P.R.I.C.E. of Success Model** · **Higher Learning Commission (HLC)** · **CCNE Accreditation**
  - **ACEMAPP NSG 522 Clinical I** · **ACEMAPP NSG 525 Clinical II** · **ACEMAPP NSG 621 Clinical IV** · **ACEMAPP NSG 631 Synthesis I PDF** · **Herzing Tutors NU 725** · **Herzing Tutors NU 730** · **Herzing Tutors NU 780** · **Stuvia Herzing NSG 523 Hub** · **Docsity Herzing Nursing Repository**

6.6 Labor Market, External Universities, Forensic Credentialing, & SAEF Practice Sources (From Document 4 & 'with Education Options')

- U.S. Bureau of Labor Statistics (BLS): **Occupational Outlook Handbook Home** · **Medical and Health Services Managers ($123,860 median, +24%)** · **Social and Community Service Managers ($80,390 median, +7%)** · **Registered Nurses ($97,550 median, +6%)** · **Fastest Growing Occupations (Nurse Practitioners +41%, $132,300 median)**
- Six-School Matrix & External Nursing/WHNP Programs:
  - UCF Online: **B.S. in Health Services Administration** · **Undergraduate Admissions** · **Transient/ Non-Degree**
  - UF Online: **B.S. in Health Education & Behavior** · **Second Bachelor's Admissions** · **Apply**
  - FAMU Online: **FAMU Online Programs** · **Transfer Students** · **Apply**
  - Thomas Edison State University (TESU): **B.S. in Health Studies** · **B.A. in Biology** · **Award of Degrees / Second Degree Policy** · **Apply**
  - Charter Oak State College: **B.S. in Health Care Administration** · **Second Baccalaureate Policy** · **Application**
  - Excelsior University: **Online B.S. in Health Sciences** · **Additional Degree Policy** · **Credit Application Policy** · **Admissions**
  - External Direct-Entry MSN & Nursing Pathways: **University of West Florida (UWF) Direct-Entry MSN** (**UWF Graduate Nursing Catalog**) · **Regis College Accelerated Direct-Entry MSN (WHNP Track)** · **Bay Path University Online DEMSN** · **West Coast University Miami Hybrid DEMSN** · **Utica University Florida Nursing Pathways** · **University of Maryland MSN-E** · **MGH Institute DEN-Comprehensive's** · **Rush University GEM**

- Forensic Nursing, WHNP-BC, Direct Primary Care (DPC), SART/CODIS, & SAEF Sources:
  - **NCC Women's Health Care Nurse Practitioner (WHNP-BC)** · **NPWH** · **AANP** · **AWHONN** · **NBNA** · **ANCC Assumes SANE Credentialing (April 2026)** · **ANCC Advanced Forensic Nursing** · **ABMDI Medicolegal Death Investigator Certification** · **DOJ SANE Program Development & Operation Guide** · **OVC TTAC Interactive SANE Guide** · **NSVRC SART Toolkit** · **OVC SART Toolkit** · **EVAWI SARRT Module 15 (PDF)** · **SAKI Utilizing CODIS for Unsubmitted Kits (PDF)** · **DPC Coalition** · **DPC Alliance** · **Wharton Concierge Medicine Analysis** · **501(c)(3)**

+ For-Profit Hybrid Affiliation Primer (PDF) · Florida VOCA Funding (OVC) · OVW Grant Programs · OVC TTAC · APA Trauma-Research IRB Guide (PDF) · RAINN Model Criminal SOL Recommendations (2025 PDF) · CHILD USA 2025 SOL Tracker · End the Backlog · RAINN

6.7 HUADA Primary Evidentiary Archive & Multi-Agency Dockets (Chavon J. Wright v. Herzing University)

- Chavon J. Wright — Comprehensive Academic Record (with Education Options) (July 2026 PDF)
- HUADA Priority Filings & Core Transmittals Web Archive (priority.html) · Live HUADA Netlify Index
- MSN-DE to HHS Interactive Equivalency Web Matrix (msnde-hhs.html)
- MSN-DE to HHS Equivalency: Failure to Remedy (Oct 7, 2026 PDF) (Alt Copy)
- MSN-DE to HHS Equivalency and Credit Audit (Oct 9, 2026 PDF) · Standalone Registry PDF & HUADA+ Archive Audit
- Witness Declaration & Request for Institutional Review — Sarah Millard (Oct 10, 2026 PDF)
- EthicsPoint 1: 18-Month Communication Blackout & Advisory Abandonment (Oct 5, 2026 PDF)
- EthicsPoint 2: EEOC, ADA, Discrimination, & Harassment (Oct 5, 2026 PDF)
- EthicsPoint 3: Financial, Time, or Benefits Abuse (Oct 5, 2026 PDF)
- EthicsPoint 4: Safety of Physical Environment (Oct 5, 2026 PDF)
- EthicsPoint 5: FERPA Records Concealment & 34 C.F.R. § 99.32 Logs (Oct 5, 2026 PDF)
- 15 of 15 Internal Appeals, Complaints, & EthicsPoint Filings Ignored/Unresolved Ledger (Sept 27, 2026 PDF)
- Angie Zamecnik Evidentiary Dossier & Sept 18 Teams Transcript (27:15–27:41) (Sept 27, 2026 PDF) · Teams Recording/Transcript Exhibit
- Longitudinal Graduate Catalog Policy Evolution & Retaliatory Shifts Audit (Sept 27, 2026 PDF)
- Core Administrative Due Process & Financial Injury Evidentiary Filing Packet (Sept 16, 2026 PDF)
- Curricular Workload Audit: 250% Disparate Academic Volume & Accommodation Denial Dossier (Aug 24, 2026 PDF) · Exhibit F: 145-Assignment Sherpath Audit
- Exhibit B: Summer 2025 NSG 523 Public Zoom Final Exam Transcript (21:10:05 Verbal Processing Ban)
- Exhibit C: ADA Coordinator Emilie Thompson Written Admission of Flawed Notices (Aug 7, 2025)
- Exhibit D: ProctorU / Meazure Learning 6-Hour Technical Delay & Lockout Ticket #0000003 · Exhibit E: Meazure 15-Minute Rescheduling Policy
- Exhibit H: Multi-Agency Regulatory Notice & Spoliation Hold Directive
- Formal ADA Appeal and Notice of Claims (Dec 10/13, 2025 Final Letter Version)
- Systems-Based Practice (NU 730) Timely Submission Acknowledged Then Changed to Zero Screenshot (Oct 9, 2026)

ACCESSIBILITY NAVIGATION: [↑ Cover & Disclaimer] · [↑ Table of Contents] · [↑ Case & Ticket Sheet] · [↑ Updated CV & SNHU Audit] · [↑ Angie MP4 & Transcript] · [↑ Gemini Podcast & Transcript] · [↑ Sarah Millard & Emails Addendum] · [Vol I] · [Vol II] · [Vol III] · [Vol IV] · [Vol V] · [Vol VI] · [Vol VII] · [Vol VIII] · [Vol IX] · [Vol X] · [↓ Table of Cases (Chronological)] · [↓ Table of Statutes] · [↓ Legal & Clinical Glossary] · [↓ Reference Registry] · [↓ Complete Index]

CWRIGHT26 COMPLETE COMPENDIUM · VOLUME VI

VOLUME VI: Verified Federal Civil Rights, Contract & Consumer Fraud Complaint (M.D. Fla. Ocala Division) & Pre-Suit Demand

VERIFIED FEDERAL COMPLAINT, JURY DEMAND, & PRE-LITIGATION SETTLEMENT DEMAND

Research & Pre-Litigation Pleading Draft Prepared From the Perspective of Plaintiff / Complainant Chavon Jenea Wright for Legal Counsel Review or Pro Se Filing

Primary Federal Venue: **United States District Court for the Middle District of Florida, Ocala Division** (Covering Marion County, Florida under Local Rule 1.04[a])

Alternative Federal Venue: United States District Court for the Eastern District of Wisconsin (Milwaukee Division) or Western District of Wisconsin (Madison Division)

Companion Project Volumes:

- **Document 1: HH 630 & HH 620 Comprehensive Syllabus** · **Document 2: MSN-DE Comprehensive Syllabus** · **Document 3: MSN-DE to HHS Program Comparison** · **Document 4: Career & Education Pathways** · **Document 5: Legal & Statutory Damages Compendium** · **MSNDE to HHS Gemini Notebook**

PART I: FORMAL FEDERAL COURT PLEADING DRAFT

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
OCALA DIVISION

CHAVON JENEA WRIGHT,
an individual residing in Marion County, Florida,
Plaintiff,

v.

Case No.: 5:26-cv-_____-___-PRL
JURY TRIAL DEMANDED

HERZING UNIVERSITY, INC.,
a Wisconsin corporation,
Defendant.

VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF, COMPENSATORY, RELIANCE, CONSEQUENTIAL, STATUTORY TREBLE, AND PUNITIVE DAMAGES, AND ATTORNEYS' FEES

Plaintiff CHAVON JENEA WRIGHT ("Plaintiff" or "Ms. Wright"), by and through undersigned counsel (or proceeding pro se pending appearance of retained counsel), brings this Verified Complaint against Defendant HERZING UNIVERSITY, INC. ("Defendant" or "Herzing") and alleges upon personal knowledge as to her own acts and status, and upon contemporaneous institutional records, audio/video transcripts, and information and belief as to all other matters, as follows:

I. NATURE OF THE ACTION

1. This civil rights, educational contract, deceptive trade practices, and statutory fraud action arises out of Defendant Herzing University's eighteen-month campaign of deliberate indifference, systemic failure to implement federally mandated disability accommodations, unauthorized mass disclosure of confidential medical records, extortionate triple-billing of Title IV student loan funds for a single course (NSG 523), imposition of a 250.0% disparate academic workload (145 graded modules completed versus the 58-module peer standard), secret predetermination of internal appeals, and retaliatory dismissal and refusal to process a catalog-authorized degree transition from the Master of Science in Nursing – Direct Entry (**MSN-DE**) into the Master of Science in Health and Human Services Leadership (**MS-HHSL** / **MS-HHS**) (**HUADA Priority Evidentiary Archive**, **Workload Audit Dossier**).
2. Plaintiff is a highly credentialed Black female graduate student holding three Associate degrees (4.10 GPA, President's List), a Bachelor of Science in Integrative Studies (3.30 GPA, Dean's List), and a

conferred Master of Science in Forensic Psychology (Southern New Hampshire University, 2024), who matriculated into Defendant's online MSN-DE program and achieved a 4.00 Grade Point Average in foundational nursing sciences (SC 154 Anatomy & Physiology I [Grade A] and SC 254 Anatomy & Physiology II [Grade A]) and a 3.55 Corrected Cumulative GPA across 40.00 earned credits (**Comprehensive Academic Record**, **MSN-DE to HHS Credit Audit**).

3. On March 14, 2025, Plaintiff submitted formal medical documentation establishing clinically diagnosed Attention-Deficit/Hyperactivity Disorder (ADHD), Generalized Anxiety Disorder (GAD), Major Depressive Disorder (MDD), and Autism Spectrum Disorder (Level 1, ICD-10 F84.0), requiring 200% extended testing time, a private distraction-reduced testing environment permitting verbal processing/self-talk, and a 48-to-72-hour extension window for asynchronous coursework (**Notice of Claims**).
4. Rather than implement these approved modifications under Section 504 of the Rehabilitation Act (**29 U.S.C. § 794**; **34 C.F.R. § 104.44**) and Title III of the Americans with Disabilities Act (**42 U.S.C. § 12182**; **28 C.F.R. § 36.309**), Defendant:
    - (a) Broadcast 41 separate erroneous accommodation emails between May 2 and May 19, 2025 to approximately 35 unauthorized recipients with whom Plaintiff had no instructional relationship, leaking her confidential disability status in violation of FERPA (**20 U.S.C. § 1232g**) and Wis. Stat. § 146.84, and subsequently refused to produce the mandatory 34 C.F.R. § 99.32 disclosure log (**EthicsPoint 5 Filing**);
    - (b) Forced Plaintiff during Summer 2025 (NSG 523-7A) to take a high-stakes final examination in an unmonitored, noisy public Zoom room where faculty proctor Leah Phillips interrupted Plaintiff at timestamp 21:10:05 to actively prohibit her approved verbal-processing accommodation (**Exhibit B: Public Zoom Transcript**);
    - (c) Refused to grade timely extension-window assignments despite a written admission on August 7, 2025 by Defendant's ADA/Title IX Coordinator Emilie Thompson conceding that the accommodation notices sent to faculty were "flawed" and that extension coursework "should be graded for credit" (**Exhibit C: ADA Coordinator Admission**);
    - (d) Subjected Plaintiff during Fall 2025 (NSG 523-7F) to an unconfigured ProctorU profile resulting in a 6-hour technical lockout (**Meazure Ticket #0000003**) while refusing to honor the vendor's published 15-minute rescheduling mandate (**Exhibit D: Ticket #0000003**, **Exhibit E: Meazure 15-Min Policy**);
    - (e) Summarily denied Plaintiff's request to utilize Defendant's published Catalog Hybrid Policy to take proctored exams in person at a regional Florida campus to bypass recurring remote proctoring collapses (summary denial by AVP Dr. Danielle Laban) (**Financial Injury Packet Exhibit 4**);
    - (f) Forced Plaintiff to pay tuition three separate times for NSG 523 (at an arbitrarily inflated rate of $790.00/credit announced June 3, 2025) and execute 145 discrete graded Elsevier Sherpath/EAQ assignments (250.0% of the 58-assignment peer requirement, totaling 160–190 hours of redundant labor) after she had already completed 100% of all 60 assignments in Summer 2025 (**Exhibit F: 145-Assignment Audit**);
    - (g) Altered a timely, instructor-acknowledged submission in NU 730 (Systems-Based Practice, where Plaintiff earned an 81.27% Grade B) to a zero (0.0) after submission (**NU 730 Grade Alteration Screenshot**), and entered unapplied extension zeros in Summer 2026 NSG 523 to drop Plaintiff's passing 79%+ standing to 73.0%;
    - (h) Suppressed 15 out of 15 internal appeals, grievances, and EthicsPoint compliance filings between March 2025 and September 2026 (**15-of-15 Ignored Filings Ledger**), while secretly revising the Graduate Catalog in May 2025, September 2025, and January 2026 to cut student appeal windows from 30 days to 7 days (**Catalog Evolution Audit**); and
    - (i) Issued a predetermined Satisfactory Academic Progress (SAP) dismissal (Case #00000044) on September 9, 2026 while Plaintiff's timely September 4, 2026 Grade Appeal was still pending—as admitted on a recorded Microsoft Teams teleconference on September 18, 2026 (timestamps 27:15–27:41) by Director of Student Services Angie Zamecnik (**Zamecnik Dossier & Transcript**, **Teams Recording Exhibit**)—in order to block Plaintiff's September 2, 2026 petition to transfer her 21.00 completed graduate credits into Defendant's 31.00-credit MS-HHS degree for May 2027 conferral (**MSN-DE to HHS Equivalency Brief**).

II. JURISDICTION AND VENUE

1. Federal Question Jurisdiction (**28 U.S.C. §§ 1331, 1343**): This Court has original federal-question jurisdiction over Plaintiff's claims arising under Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §§ 794, 794a), Title III and Title V of the Americans with Disabilities Act of 1990 (42 U.S.C. §§ 12182, 12188, 12203), the Civil Rights Act of 1866 (42 U.S.C. §§ 1981, 1988), and Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d).
2. Diversity Jurisdiction (**28 U.S.C. § 1332[a][1]**): Independently, this Court has diversity jurisdiction because Plaintiff is a citizen and domiciliary of the State of Florida (Marion County), Defendant Herzing University, Inc. is incorporated and maintains its principal place of business in the State of Wisconsin (275 W. Wisconsin Ave., Ste. 210, Milwaukee, WI 53203 and 5218 E. Terrace Dr., Madison, WI 53718), and the amount in controversy exceeds $75,000.00, exclusive of interest and costs.
3. Supplemental Jurisdiction (**28 U.S.C. § 1367[a]**): This Court has supplemental jurisdiction over Plaintiff's interrelated state-law claims under the laws of the State of Florida and the State of Wisconsin because they form part of the same case or controversy under Article III of the United States Constitution.

4. Personal Jurisdiction and Venue (**28 U.S.C. § 1391[b][2]** & **Fla. Stat. § 48.193**): Venue is proper in the Ocala Division of the Middle District of Florida (**M.D. Fla. Local Rules**) because a substantial part of the events or omissions giving rise to the claims occurred in Marion County, Florida, where Plaintiff resides, contracted with Defendant, took proctored examinations, and suffered academic, medical, and economic injury, and because Defendant purposefully avails itself of the Florida market by operating licensed campuses in Florida, advertising a dedicated **Florida MSN-DE Program**, and placing Plaintiff in clinical rotations at HCA Healthcare Osceola Hospital in Florida.

III. PARTIES

1. Plaintiff Chavon Jenea Wright (Student ID: W24672939) is an adult individual residing at 597 Marion Oaks Trail, Ocala, Marion County, Florida 34473. Plaintiff is a "qualified individual with a disability" within the meaning of 29 U.S.C. § 794(a) and 42 U.S.C. § 12182, a member of a protected racial class under 42 U.S.C. § 1981 and 42 U.S.C. § 2000d, and a "consumer" under Fla. Stat. § 501.203(7) and Wis. Stat. § 100.18.
2. Defendant Herzing University, Inc. (OPE ID: 00962100; IPEDS UnitID: 240392) is a Wisconsin corporation headquartered at 275 W. Wisconsin Ave., Suite 210, Milwaukee, WI 53203, operating a place of public accommodation under 42 U.S.C. § 12181(7)(J) and receiving tens of millions of dollars annually in Federal Title IV financial assistance under 29 U.S.C. § 794(b)(2)(A).

IV. THE 21-CREDIT MS-HHS EQUIVALENCY & CONTRACTUAL REMEDY RECORD

1. Under Defendant's published Graduate Catalog (**Herzing Graduate Catalog**, **MS-HHSL Program**) and federal course-substitution mandates (34 C.F.R. § 104.44[a]), Plaintiff has already completed and passed 21.00 of the 31.00 credits (67.74%) required for the Master of Science in Health and Human Services Leadership (**MS-HHSL** / **MS-HHS**):

- (a) **HH 500** (3.00 cr) satisfied by Herzing **NU 780** Population Health (3.00 cr, Grade B);
- (b) **HH 510** (3.00 cr) satisfied by Herzing **NSG 660** Scholarly Practice (3.00 cr, Grade A);
- (c) **HH 600** (3.00 cr) satisfied by Herzing **NU 730** Systems-Based Practice (3.00 cr, Grade B [81.27%]);
- (d) **HH 610** (3.00 cr) satisfied by Herzing **NU 725** Health Care Informatics (3.00 cr, Grade B);
- (e) **MSW 510** (3.00 cr) satisfied by Herzing **NSG 524** Mental Health Nursing (3.00 cr, Grade A) or SNHU **PSY 545** Forensic Psychology (3.00 cr, Grade A);
- (f) **MSW 521** (3.00 cr) satisfied by Herzing **NSG 633** Safety and Quality (3.00 cr, Grade A); and
- (g) **MSW 540** (3.00 cr) satisfied by SNHU **PSY 624** Intersection of Law and Psychology (3.00 cr, Grade A).

1. Only 10.00 credits (3 courses) remain for Plaintiff to confer the MS-HHS degree in May 2027: **HH 620** (3.00 cr, Fall 2026 Session B), **HH 630** (4.00 cr, Spring 2027 Session A), and **HH 690** (3.00 cr, Spring 2027 Session A) (**Program Comparison Dossier**).

V. CAUSES OF ACTION (COUNTS I – X)

COUNT I: Violation of Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794**;** 34 C.F.R. §§ 104.7, 104.43, 104.44**) — Deliberate Indifference, Disparate Burden, & Refusal of Course Substitution**

1. Plaintiff realleges and incorporates Paragraphs 1 through 12.
2. Defendant receives federal financial assistance and is bound by 29 U.S.C. § 794 and 34 C.F.R. Part 104.
3. Under controlling 11th Circuit precedent (**Liese v. Indian River County Hospital District, 701 F.3d 334, 345–49 [11th Cir. 2012]**) and federal appellate authority (**Wynne v. Tufts Univ. Sch. of Med., 932 F.2d 19 [1st Cir. 1991]**; **Dean v. Univ. at Buffalo Sch. of Med., 804 F.3d 178 [2d Cir. 2015]**; **Guckenberger v. Boston Univ., 974 F. Supp. 106 [D. Mass. 1997]**), Defendant acted with deliberate indifference by failing to configure approved testing adjustments after actual notice, admitting in writing on August 7, 2025 that its notices were flawed (Exhibit C) yet refusing to correct the resulting zero marks, imposing a 250% disparate assignment burden (34 C.F.R. § 104.43), failing to maintain a prompt and equitable ADA grievance procedure (34 C.F.R. § 104.7), and refusing reasonable course substitution into the MS-HHS program (34 C.F.R. § 104.44[a]).
4. Damages: Pursuant to 29 U.S.C. § 794a(a)(2) and § 794a(b), Plaintiff is entitled to full pecuniary expectation, reliance, restitutionary, and consequential economic damages (including full tuition/fee disgorgement, tuition-hike differentials, lost HCA Ocala Nurse Tech wages, out-of-pocket medical/pharmacological titration expenses, wasted platform/mitigation labor, and consequential property losses), mandatory injunctive relief, and reasonable attorneys' fees and costs.

COUNT II: Violation of Title III & Title V of the Americans with Disabilities Act (42 U.S.C. §§ 12182, 12188, 12203**;** 28 C.F.R. § 36.309**) — Denial of Accessible Testing & Unlawful Retaliation**

1. Plaintiff realleges and incorporates Paragraphs 1 through 16.
2. Defendant violated 42 U.S.C. § 12182(b)(2)(A)(ii) and 28 C.F.R. § 36.309 by failing to offer examinations in an accessible place and manner (including barring verbal processing at 21:10:05 of the Summer 2025 Zoom final, locking Plaintiff out for 6 hours on ProctorU under Ticket #0000003, and denying catalog-authorized hybrid on-campus testing), and violated Title V (**42 U.S.C. § 12203[a]–[b]**) by

retaliating against Plaintiff for her protected civil rights complaints (OCR Case 05-26-2347; DOJ Referral 766398-JVT) through predetermined SAP dismissal and withholding her Transfer Credit Evaluation.
3. Relief: Plaintiff is entitled to permanent injunctive relief under 42 U.S.C. § 12188(a)(1), attorneys' fees under 42 U.S.C. § 12205, and—upon intervention or enforcement by the United States Attorney General (DOJ Referral 766398-JVT) under 42 U.S.C. § 12188(b)(2)(B) and 28 C.F.R. § 36.504(a)(2)—full monetary damages including emotional distress, pain, and suffering plus civil penalties.

COUNT III: Violation of the Civil Rights Act of 1866 (42 U.S.C. §§ 1981, 1988**) & Title VI (**42 U.S.C. § 2000d**) — Disparate Racial Treatment & Retaliation in Educational Contract Enforcement**

1. Plaintiff realleges and incorporates Paragraphs 1 through 19.
2. Under 42 U.S.C. § 1981 (Runyon v. McCrary, 427 U.S. 160 [1976]; CBOCS West, Inc. v. Humphries, 553 U.S. 442 [2008]), Plaintiff had the right to make, perform, modify, and enforce her educational contract with Defendant free from racial discrimination, arbitrary naming hostility ("CJ Wright" attendance zero threat), 250% disparate workload enforcement, and retaliation after filing formal Title VI racial discrimination grievances (EthicsPoint Filings, Sept 17 & 27, 2026).
3. Damages: Because 42 U.S.C. § 1981 is enacted under the Thirteenth Amendment rather than the Spending Clause, Plaintiff is entitled to uncapped compensatory damages (including full emotional distress, mental anguish, and humiliation), past and future lost earning capacity, AND punitive damages (Johnson v. Railway Express Agency, Inc., 421 U.S. 454 [1975]), plus attorneys' fees under 42 U.S.C. § 1988.

COUNT IV: Breach of Express and Implied-in-Fact Educational Contract Under Florida and Wisconsin Law (Sharick v. Southeastern Univ. of the Health Sciences, Inc., 780 So. 2d 136 [Fla. 3d DCA 2000]; Jallali v. Nova Southeastern Univ., 992 So. 2d 338 [Fla. 4th DCA 2008]; Cosio v. Medical College of Wisconsin, 139 Wis. 2d 241 [Ct. App. 1987])

1. Plaintiff realleges and incorporates Paragraphs 1 through 22.
2. Defendant's published Graduate Catalog, Student Handbook, ADA Policy, Hybrid Campus Testing Policy, Incomplete Grade Policy, and Program Transfer Policy constituted an enforceable contract between Defendant and Plaintiff.
3. Defendant arbitrarily, capriciously, and in bad faith breached that contract by: (a) refusing to credit timely extension coursework despite written confirmation from its ADA Coordinator (Exhibit C); (b) altering Plaintiff's timely passing NU 730 grade (81.27% B) to zero; (c) denying catalog-guaranteed hybrid on-campus testing; (d) cutting appeal deadlines from 30 to 7 days without notice; (e) executing an SAP dismissal while Plaintiff's timely Grade Appeal was pending; and (f) blocking Plaintiff's transfer into the MS-HHS degree.
4. Damages: Under **Sharick v. Southeastern University of the Health Sciences, Inc., 780 So. 2d 136, 139–41 (Fla. 3d DCA 2000)** (**Sharick II, 21 So. 3d 41**), Plaintiff is entitled to recover full tuition and fee restitution, lost past wages (forfeited HCA Ocala Nurse Tech externship), AND the present actuarial value of her impaired and delayed future career earning capacity ($195,100 to $550,000+), alongside specific performance compelling conferral/enrollment in the MS-HHS program.

COUNT V: Promissory Estoppel & Unjust Enrichment / Quantum Meruit (Hoffman v. Red Owl Stores, Inc., 26 Wis. 2d 683 [1965])

1. Plaintiff realleges and incorporates Paragraphs 1 through 26.
2. In reasonable and foreseeable reliance on Defendant's written promises—including ADA Coordinator Emilie Thompson's August 7, 2025 written assurance (Exhibit C) and catalog assurances of hybrid testing and credit transferability—Plaintiff paid three terms of tuition, expended 160–190 hours completing 87 redundant Sherpath modules (145 total modules), and expended 281+ hours compiling 40,200+ words of compliance records.
3. Damages: Under **Hoffman v. Red Owl Stores, Inc., 26 Wis. 2d 683 (1965)** and Florida promissory estoppel/unjust enrichment law, Plaintiff is entitled to full reliance damages, disgorgement of unjustly retained tuition, and compensation for her wasted academic and compliance labor ($40,100 to $84,700).

COUNT VI: Violation of the Wisconsin Deceptive Trade Practices Act (Wis. Stat. § 100.18)

1. Plaintiff realleges and incorporates Paragraphs 1 through 29.
2. From its Wisconsin headquarters, Defendant made untrue, deceptive, and misleading representations to induce Plaintiff's enrollment and repeat tuition payments regarding flexible scheduling, individualized ADA accommodations, hybrid campus testing, and QuickPaths credit portability.
3. Damages: Pursuant to **Wis. Stat. § 100.18(11)(b)2**, Plaintiff is entitled to recover 100% of her pecuniary loss, together with court costs and mandatory reasonable attorneys' fees.

COUNT VII: Wisconsin Statutory Civil Theft by Fraud — Treble Damages & Investigation Costs (Wis. Stat. § 895.446 **&** Wis. Stat. § 943.20[1][d]**)**

1. Plaintiff realleges and incorporates Paragraphs 1 through 32.
2. Defendant intentionally obtained and retained title to Plaintiff's tuition funds and federal student loan disbursements across three enrollments of NSG 523 through false representations that her approved

extension coursework would be graded and her appeals fairly reviewed, while secretly predetermining appeal denials (Sept 18, 2026 Zamecnik/Laban Recording).
3. Damages: Pursuant to Wis. Stat. § 895.446(3)(a)–(c), Plaintiff is entitled to recover actual damages, exemplary (treble) damages of up to 3x actual damages, and all costs of investigation and litigation (including Plaintiff's 281+ forensic investigation hours) plus reasonable attorneys' fees.

COUNT VIII: Breach of Medical Record Confidentiality & Invasion of Privacy (Wis. Stat. §§ 146.82, 146.84[1][b]–[bm]**,** Wis. Stat. § 995.50[2][c]**, & Florida Common Law)**

1. Plaintiff realleges and incorporates Paragraphs 1 through 35.
2. Between May 2 and May 19, 2025, Defendant's ADA Office negligently, knowingly, and willfully transmitted 41 separate emails disclosing Plaintiff's confidential medical/psychiatric accommodation records to approximately 35 unauthorized recipients without consent, and subsequently concealed the 34 C.F.R. § 99.32 disclosure log.
3. Damages: Under Wis. Stat. § 146.84(1)(b)–(bm) and § 995.50, Plaintiff is entitled to recover actual damages (including full emotional distress and mental anguish), exemplary damages of up to $25,000 per willful violation (or $1,000 per negligent violation), plus mandatory costs and reasonable actual attorneys' fees.

COUNT IX: Violation of the Florida Deceptive and Unfair Trade Practices Act (Fla. Stat. §§ 501.204, 501.2077, 501.2105, 501.211) & Florida Fair Consumer Practices (Fla. Stat. §§ 1005.04, 1005.32, 1005.38; Fla. Admin. Code r. 6E-1.0032)

1. Plaintiff realleges and incorporates Paragraphs 1 through 38.
2. Defendant's violations of Fla. Stat. § 1005.04 and Fla. Admin. Code r. 6E-1.0032 constitute per se unfair and deceptive trade practices under Fla. Stat. § 501.203(3)(c) and § 501.204(1) victimizing a person with a disability (Fla. Stat. § 501.2077).
3. Damages: Plaintiff is entitled to declaratory and injunctive relief (§ 501.211[1]), actual damages (§ 501.211[2]), mandatory attorneys' fees and costs (§ 501.2105), and enhanced civil penalties of up to $15,000 per violation under § 501.2077.

COUNT X: Violation of the Florida Misleading Advertising Statute (Fla. Stat. § 817.41) & Punitive Damages (Fla. Stat. §§ 768.72–768.73**;** Wis. Stat. § 895.043**)**

1. Plaintiff realleges and incorporates Paragraphs 1 through 41.
2. Defendant disseminated misleading advertisements to the Florida public regarding its online/hybrid MSN-DE support, flexible scheduling, and credit portability in violation of Fla. Stat. § 817.41(1).
3. Damages: Pursuant to **Fla. Stat. § 817.41(6)**, Plaintiff "shall, in addition to any other remedies or damages, be awarded costs, including reasonable attorney's fees, and may be awarded punitive damages in addition to actual damages," alongside punitive damages under Fla. Stat. § 768.73(1)(a)–(b) (up to 3x compensatory damages / $500,000, or 4x compensatory damages / $2,000,000 for conduct motivated by unreasonable financial gain) and Wis. Stat. § 895.043(6) (up to 2x compensatory damages / $200,000).

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Chavon Jenea Wright respectfully prays that this Court enter judgment in her favor and against Defendant Herzing University, Inc. as follows:

- A. Mandatory Preliminary and Permanent Injunctive Relief / Specific Performance:
    1. Ordering Defendant to immediately expunge Plaintiff's September 9, 2026 SAP dismissal (Case #00000044) and the contested failing grades in NSG 523, and to restore Plaintiff's earned passing grade of B (81.27%) in NU 730 and passing B (>=80%) or Administrative Withdrawal (W) in NSG 523;
    2. Ordering Defendant to immediately process Plaintiff's September 2, 2026 program transfer into the Master of Science in Health and Human Services Leadership (**MS-HHSL** / **MS-HHS**), applying all 21.00 completed graduate equivalency/transfer credits (HH 500, 510, 600, 610 and MSW 510, 521, 540) and enrolling Plaintiff on a 100% tuition- and fee-waived basis in the remaining 10.00 credits (HH 620 [3 cr], HH 630 [4 cr], and HH 690 [3 cr]) for May 2027 degree conferral;
    3. Ordering Defendant to immediately release Plaintiff's unencumbered Official Transcripts, completed Transfer Credit Evaluation (withheld since September 14, 2026), and complete FERPA **34 C.F.R. § 99.32** disclosure log and Canvas SQL grade-mutation histories;
- B. Direct Pecuniary, Restitutionary, & Consequential Damages (**WILL** Category):
    1. $28,500 to $69,260 in full tuition, fee, and interest disgorgement/restitution (plus 100% discharge/indemnification of all Federal Direct Student Loans);
    2. $73,500 to $84,000 in past lost clinical wages from the forfeited HCA Ocala Nurse Tech externship;
    3. $15,000 to $85,000 in out-of-pocket and future medical, psychiatric, and pharmacological titration expenses;

4. $20,000 to $50,000+ in foreseeable consequential property losses (vehicle repossession and loss of personal storage unit);

- C. Wasted Time, Reliance Labor, & Impaired Career Earning Capacity Damages (**WILL** / **MAY** Category):
    1. $40,100 to $84,700 for 160–190 hours of redundant Sherpath platform labor (250% workload) and 281+ hours of forced compliance/investigation labor under Wis. Stat. § 895.446(3)(b) and Hoffman v. Red Owl Stores;
    2. $195,100 to $550,000+ in present actuarial value of delayed/impaired career earning capacity under **Sharick v. Southeastern University of the Health Sciences, Inc., 780 So. 2d 136 (Fla. 3d DCA 2000)**;
- D. Non-Economic, Exemplary, Treble, & Punitive Damages (**MAY** Category):
    1. $100,000 to $500,000 in emotional distress, mental anguish, humiliation, and privacy invasion damages under 42 U.S.C. § 1981, Wis. Stat. § 146.84, Wis. Stat. § 995.50, and Florida tort law;
    2. Statutory Treble (3x) Damages under Wis. Stat. § 895.446(3)(c) ($85,500 to $207,780) and Statutory Exemplary Privacy Damages of up to $25,000 per willful violation (41 unauthorized emails) under Wis. Stat. § 146.84(1)(bm) and $15,000 per violation under Fla. Stat. § 501.2077;
    3. Punitive Damages under 42 U.S.C. § 1981, **Fla. Stat. § 817.41(6)**, Fla. Stat. § 768.73(1)(a)–(b) (up to 3x/$500,000 or 4x/$2,000,000), and Wis. Stat. § 895.043(6) (up to 2x/$200,000); and
- E. Mandatory Statutory Attorneys' Fees, Expert Fees, Costs, & Interest:
    1. Full prevailing-party attorneys' fees, expert witness fees, and litigation costs pursuant to 29 U.S.C. § 794a(b), 42 U.S.C. §§ 1988, 12205, Wis. Stat. §§ 100.18(11)(b)2, 895.446(3)(b), 146.84, and Fla. Stat. §§ 501.2105, 817.41(6), plus pre- and post-judgment interest.

VII. DEMAND FOR JURY TRIAL & 28 U.S.C. § 1746 VERIFICATION

Plaintiff hereby demands a trial by jury on all issues triable of right by a jury pursuant to Federal Rule of Civil Procedure 38.

VERIFICATION UNDER 28 U.S.C. § 1746:
I, Chavon Jenea Wright, declare under penalty of perjury under the laws of the United States of America that I am the Plaintiff in the above-captioned action, that I have read the foregoing Verified Complaint, and that the factual allegations stated therein are true and correct to the best of my personal knowledge, information, and belief.

Executed in Ocala, Marion County, Florida on this 18th day of October, 2026.

/s/ Chavon Jenea Wright
Chavon Jenea Wright, M.S., B.S., A.A., A.S., A.G.S.
597 Marion Oaks Trail, Ocala, FL 34473 · (352) 300-5416 · chavon.wright@gmail.com

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PART II: FORMAL PRE-SUIT SETTLEMENT & EQUITABLE RESOLUTION DEMAND LETTER TO HERZING GENERAL COUNSEL & PRESIDENT RENÉE HERZING

CONFIDENTIAL SETTLEMENT COMMUNICATION PURSUANT TO FED. R. EVID. 408, WIS. STAT. § 904.08, & FLA. STAT. § 90.408

DATE: October 18, 2026
TO: President Renée Herzing; Office of the General Counsel; AVP Dr. Danielle Laban; AVP Dr. David Steele; Director Angie Zamecnik — Herzing University, Inc., 275 W. Wisconsin Ave., Ste. 210, Milwaukee, WI 53203
RE: FINAL PRE-SUIT SETTLEMENT DEMAND & NOTICE OF INTENT TO FILE VERIFIED FEDERAL COMPLAINT — Chavon Jenea Wrighht (ID: W24672939 | OCR Case No. 05-26-2347 | DOJ Ref. 766398-JVT)
|---|
Dear President Herzing and Office of General Counsel:

Please take notice that the attached Verified Federal Complaint has been prepared for filing in the United States District Court for the Middle District of Florida (Ocala Division), asserting claims under Section 504 (29 U.S.C. § 794), ADA Title III & Title V (42 U.S.C. §§ 12182, 12203), 42 U.S.C. § 1981, Wis. Stat. §§ 100.18, 895.446 (Treble Fraud), 146.84 ($25,000/Violation Medical Privacy), Fla. Stat. §§ 501.204/501.2077 (FDUTPA), 817.41 (Misleading Advertising Punitive Damages), and Florida/Wisconsin educational contract law (**Sharick v. Southeastern Univ., 780 So. 2d 136**; **Hoffman v. Red Owl Stores, 26 Wis. 2d 683**).

To afford Herzing University one final opportunity to mitigate its multi-hundred-thousand-dollar exposure under Sharick, statutory treble/exemplary multipliers, and eight mandatory prevailing-party attorney-fee-shifting statutes prior to the November 2, 2026 Fall Session B start date, Ms. Wright hereby offers to resolve the immediate academic and equitable components (or enter global pre-suit mediation) upon execution of the following Five-Point Equitable & Financial Resolution on or before October 28, 2026 at 5:00 PM EDT:

1. Immediate Reinstatement & Program Transfer to MS-HHS (21 Credits Satisfied / 10 Credits Remaining): Vacate the September 9, 2026 SAP dismissal (Case #00000044), apply all 21.00 completed graduate equivalency/transfer credits (NU 780 -> HH 500, NSG 660 -> HH 510, NU 730 -> HH 600, NU 725 -> HH 610, NSG 524/PSY 545 -> MSW 510, NSG 633 -> MSW 521, PSY 624 -> MSW 540), and register Ms. Wright in **HH 620** (3 cr, Fall 2026 Session B starting Nov 2, 2026), followed by **HH 630** (4 cr) and **HH 690** (3 cr) in Spring 2027 Session A for May 2027 MS-HHS degree conferral.
2. Transcript & Grade Remediation: Expunge the contested NSG 523 failure grades (or convert to non-punitive Administrative Withdrawals W / restore passing B with extension marks credited per Emilie Thompson's Aug 7, 2025 admission) and restore the earned Grade B (81.27%) in NU 730, reflecting a 3.55 Cumulative GPA and 4.00 Science GPA.
3. Tuition Waiver for Remaining 10 MS-HHS Credits & Full Restitution/Cancellation of Contested NSG 523 Charges: Waive all tuition and resource fees for the remaining 10.00 MS-HHS credits ($7,410–$8,250 value) and refund/return to Title IV lenders 100% of tuition and fees billed for the three unaccommodated NSG 523 enrollments.
4. Immediate Release of Official Transcripts, Transfer Credit Evaluation, & FERPA § 99.32 Logs: Release Ms. Wright's official transcripts, the completed Transfer Credit Evaluation referenced by Angie Zamecnik on September 14, 2026, and the complete 34 C.F.R. § 99.32 disclosure log.
5. Compensatory Settlement Payment / Global Mediation: Tender a pre-suit compensatory settlement payment (or agree to binding 30-day mediation with a retired federal magistrate judge) to resolve Ms. Wright's documented consequential losses (forfeited HCA Ocala wages, 250% redundant labor, 281+ advocacy hours, medical titration costs, and May 2025 medical privacy breaches).

VIII. COMPLETE TRACEABLE EXHIBIT & REFERENCE INDEX FOR VERIFIED COMPLAINT

- Primary HUADA Evidentiary Exhibits: **HUADA Priority Archive (priority.html)** · **Live Netlify Docket D2** · **Academic Record with Education Options** · **MSN-DE to HHS Equivalency Brief** · **MSN-DE to HHS Credit Audit** · **Exhibit B: Public Zoom Transcript (21:10:05)** · **Exhibit C: Emilie Thompson Aug 7, 2025 Admission** · **Exhibit D: ProctorU Ticket #0000003** · **Exhibit E: Meazure 15-Min Policy** · **Exhibit F: 145-Assignment Sherpath Audit** · **Exhibit H: Multi-Agency Spoliation Hold** · **15-of-15 Ignored Filings Ledger** · **Zamecnik Sept 18 Teams Transcript** · **NU 730 Grade Alteration Screenshot** · **Sarah Millard Witness Declaration**.
- Controlling Judicial & Statutory Authorities: **Liese v. Indian River County Hosp. Dist., 701 F.3d 334 (11th Cir. 2012)** · **Sharick v. Southeastern Univ. of the Health Sciences, Inc., 780 So. 2d 136 (Fla. 3d DCA 2000)** · **Sharick II, 21 So. 3d 41 (Fla. 3d DCA 2009)** · **Jallali v. Nova Southeastern Univ., 992 So. 2d 338 (Fla. 4th DCA 2008)** · **Wynne v. Tufts Univ., 932 F.2d 19 (1st Cir. 1991)** · **Dean v. Univ. at Buffalo, 804 F.3d 178 (2d Cir. 2015)** · **Guckenberger v. Boston Univ., 974 F. Supp. 106 (D. Mass. 1997)** · **Hoffman v. Red Owl Stores, Inc., 26 Wis. 2d 683 (1965)** · **Wis. Stat. § 100.18** · **Wis. Stat. § 440.52** · **Fla. Stat. Ch. 1005** · **Fla. Stat. § 501.211** · **Fla. Stat. § 817.41**.

ACCESSIBILITY NAVIGATION: [↑ Cover & Disclaimer] · [↑ Table of Contents] · [↑ Case & Ticket Sheet] · [↑ Updated CV & SNHU Audit] · [↑ Angie MP4 & Transcript] · [↑ Gemini Podcast & Transcript] · [↑ Sarah Millard & Emails Addendum] · [Vol I] · [Vol II] · [Vol III] · [Vol IV] · [Vol V] · [Vol VI] · [Vol VII] · [Vol VIII] · [Vol IX] · [Vol X] · [↓ Table of Cases (Chronological)] · [↓ Table of Statutes] · [↓ Legal & Clinical Glossary] · [↓ Reference Registry] · [↓ Complete Index]

CWRIGHT26 COMPLETE COMPENDIUM · VOLUME VII

VOLUME VII: Prospective Legal Counsel Outreach Package, Fee-Shifting Valuation & Executive Litigation Summary

INITIAL ATTORNEY OUTREACH, FEE-SHIFTING PITCH & CONTINGENCY CASE PACKAGE

Prepared From the Perspective of Prospective Client Chavon Jenea Wright for Transmission to Civil Rights, Higher Education, & Consumer Fraud Plaintiffs' Counsel

Prospective Plaintiff: Chavon Jenea Wright, M.S. (Forensic Psychology), B.S., A.A., A.S., A.G.S. · Ocala (Marion County), Florida · (352) 300-5416 · chavon.wright@gmail.com

Target Defendant: **Herzing University, Inc.** (Milwaukee / Madison, Wisconsin; operating in Florida; OPE ID: 00962100)

Companion Project Volumes:

- **Verified Federal Complaint & Pre-Suit Demand** · **Legal & Statutory Damages Compendium** · **Career & Education Pathways** · **Program Comparison** · **MSNDE to HHS Gemini Notebook**

SECTION 1: WHY PLAINTIFFS' ATTORNEYS TAKE CASES ON CONTINGENCY / FEE-SHIFTING — EXECUTIVE INTAKE STRATEGY

When reaching out to private civil rights, education, or consumer-fraud litigators, the single greatest mistake prospective clients make is sending a 20-page narrative email without highlighting fee-shifting statutes, written admissions of liability, quantified collectable damages, and organized discovery. This package gives you three tailored instruments:

1. Template A (Short Web-Form / Cold-Email Pitch — Under 350 Words): Designed to pass initial paralegal/intake screening and fit inside law firm website contact boxes (which often cap submissions at 1,500–2,500 characters).
2. Template B (Comprehensive Partner Memorandum & Transmittal Email): Designed to send once an intake coordinator or partner replies asking for your case summary and exhibits.
3. Supplemental Counsel Annexes (Included in Sections 4–6 Below):
    - One-Page Fee-Shifting & Damages Valuation Sheet (showing 8 mandatory statutory fee-shifting hooks and $330,000–$2,000,000+ in statutory/compensatory exposure);
    - Pre-Built "Smoking-Gun" Evidentiary Table (so counsel sees that 181+ hours of bates-indexed discovery work is already done for them at **wrighthuada.netlify.app**); and
    - Arbitration Clause Carve-Out & Unconscionability Brief (pre-answering the #1 defense question every higher-ed attorney asks at intake).

SECTION 2: TEMPLATE A — SHORT INITIAL OUTREACH (FOR LAW FIRM WEB FORMS & COLD EMAILS)

Subject Line: FEE-SHIFTING CASE INQUIRY: Written University ADA Admission + Recorded Appeal Predetermination + Sharick Lost Earning Capacity (Wright v. Herzing University, Inc.)

Dear Intake Counsel / Civil Rights & Higher Education Litigation Team:

I am a graduate student in Marion County, Florida (holding a 2024 M.S. in Forensic Psychology and a 4.00 Science / 3.55 Corrected Cumulative GPA at **Herzing University**) seeking contingency/fee-shifting representation against Herzing University, Inc. (a solvent Wisconsin corporation operating in Florida) for federal civil rights violations, breach of educational contract under **Sharick v. Southeastern University, 780 So. 2d 136 (Fla. 3d DCA 2000)**, and deceptive trade practices (Fla. Stat. §§ 501.204, 817.41; Wis. Stat. §§ 100.18, 895.446, 146.84).

Why This Case Is Trial- and Settlement-Ready on Day One:

1. Written Admission of Liability by Defendant's ADA Coordinator (**Exhibit C**): On August 7, 2025, Herzing's ADA/Title IX Coordinator admitted in writing that the accommodation notices sent to my faculty were "flawed" and confirmed that assignments submitted within my approved extension window "should be graded for credit." Despite this written admission, Herzing entered zeros (0.0) on timely extension work, dropping my grade from passing (80%+) to 73%, and billed me full tuition three separate times for the same course (NSG 523) while forcing me to complete 145 graded modules (250% of the 58-module peer workload) (**Exhibit F**).
2. Recorded Admission of Predetermined Appeal Denial (**Sept 18, 2026 Teams Transcript**): On a recorded September 18, 2026 advising call (27:15–27:41), Student Services Director Angie Zamecnik admitted conferring with AVP Dr. Danielle Laban to pre-determine the denial of my SAP appeal (Case #00000044) while my timely September 4, 2026 Grade Appeal was still pending, blocking my petition to transfer my 21 completed graduate credits into Herzing's 31-credit MS in Health and Human Services (**MS-HHS**) (leaving only 10 credits for May 2027 graduation).
3. 41 Unauthorized Medical Privacy Disclosures (**EthicsPoint 5**): In May 2025, Herzing broadcast 41 erroneous emails disclosing my confidential disability records to ~35 unauthorized recipients, triggering Wis. Stat. § 146.84(1)(bm) (up to $25,000 per willful violation + mandatory attorney's fees).
4. Eight Mandatory Prevailing-Party Attorney-Fee-Shifting Statutes: 29 U.S.C. § 794a(b) (Section 504), 42 U.S.C. § 12205 (ADA), 42 U.S.C. § 1988 (§ 1981), Fla. Stat. § 501.2105 (FDUTPA), Fla. Stat. § 817.41(6) (Misleading Advertising + Punitive Damages), Wis. Stat. § 100.18(11)(b)2, Wis. Stat. § 895.446(3)(b) (Treble Fraud), and Wis. Stat. § 146.84.
5. Fully Indexed Evidentiary Repository: All emails, transcripts, score reports, and a draft Verified Federal Complaint are organized in a searchable online archive (**HUADA Evidentiary Archive**).

May I send you our Verified Federal Complaint Draft and 1-Page Case Valuation Sheet for a brief conflict check and intake consultation?

Respectfully,

Chavon Jenea Wright, M.S., B.S.
Ocala, Florida · (352) 300-5416 · chavon.wright@gmail.com

SECTION 3: TEMPLATE B — COMPREHENSIVE PARTNER TRANSMITTAL LETTER & CASE BRIEFING

Subject Line: CONFIDENTIAL ATTORNEY-CLIENT INTAKE PACKET: Chavon J. Wright v. Herzing University, Inc. — Verified Complaint Draft, Smoking-Gun Admissions (Exhibits B–J), & Fee-Shifting Damages Matrix (OCR #05-26-2347 | DOJ #000000-JVT)

Dear [Attorney Name / Managing Partner]:

Thank you for reviewing my matter for potential representation. Please note that while I have conducted extensive factual organization and statutory research to make this file turnkey for counsel, I am seeking formal legal representation to prosecute my federal and state claims (and/or negotiate a pre-suit global settlement and equitable degree conferral prior to November 2, 2026).

3.1 Links to Complete Turnkey Case File & Draft Pleadings

- Draft Verified Federal Complaint & Rule 408 Demand: **CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Verified Federal Complaint and Demand**
- Comprehensive Federal, Wisconsin, & Florida Damages Research Compendium: **CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Legal and Statutory Damages**
- Searchable Online Evidentiary Repository (Exhibits B–J & 17 Email Threads): **Live HUADA Evidentiary Index** · **HUADA+ Public Archive Priority Filings Index**
- 21-of-31 Credit MS-HHS Equivalency & Career Audit: **Career & Education Pathways Dossier** · **Program Comparison Dossier**

3.2 Six "Smoking-Gun" Documentary Exhibits Requiring Zero Speculative Discovery

Unlike typical student-university disputes that turn on "he-said/she-said" testimony or academic judgment deference, every element of liability in this case is established by contemporaneous written admissions, verbatim recordings, and immutable platform logs:

Exhibit ID & Direct Link	Document Title & Date	Legal & Evidentiary Significance
Exhibit C (Aug 7, 2025)	ADA Coordinator Emilie Thompson Written Admission of Flawed Notices	Express written party-opponent admission (Fed. R. Evid. 801[d][2]) that Herzing's accommodation notices were "flawed" and that extension-window assignments "should be graded for credit"—establishing actual knowledge and deliberate indifference under **Liese v. Indian River County Hosp. Dist., 701 F.3d 334 (11th Cir. 2012)** and eliminating academic deference under **Wynne v. Tufts Univ., 932 F.2d 19 (1st Cir. 1991)**.
Exhibit B (July 24, 2025)	Summer 2025 NSG 523 Public Zoom Final Exam Transcript (*21:10:05*)	Verbatim timestamped transcript proving faculty proctor Leah Phillips forced a neurodivergent student into a noisy public Zoom session and interrupted her mid-exam at 21:10:05 to prohibit approved verbal processing (28 C.F.R. § 36.309).
Exhibit D & E (Nov 14–15, 2025)	ProctorU / Meazure 6-Hour Lockout Ticket *#0000003* & **15-Min Policy**	Third-party vendor ticket proving an unconfigured accommodation profile and 6-hour testing lockout, paired with Meazure's published rule mandating penalty-free rescheduling after 15 minutes.
Exhibit F (Aug 24, 2026)	145-Assignment Sherpath Audit & **250% Workload Dossier**	Mathematical proof that Plaintiff completed 60 of 60 graded assignments (100%) in Term 1, yet was billed 3x and forced to complete 145 graded assignments (250% of peer load = 160–190 redundant hours) across 3 terms (34 C.F.R. § 104.43).
Sept 18, 2026 Recording	Teams Teleconference Transcript (*27:15–27:41*) & **Zamecnik Dossier**	Recorded admission by Student Services Director Angie Zamecnik that she conferred with AVP Dr. Laban to pre-determine appeal denial while Plaintiff's Sept 4, 2026 Grade Appeal was pending, alongside **15 of 15 Ignored EthicsPoint Filings**.
Oct 9, 2026 Screenshot & **Millard Witness Decl.**	*NU 730* Grade Alteration Proof (*81.27% B -> 0*) & Third-Party Witness Declaration	Visual proof of post-submission grade alteration after instructor acknowledgment of timely completion, corroborated by independent witness declaration of Sarah Millard (Oct 10, 2026).

SECTION 4: ONE-PAGE CONTINGENCY & STATUTORY FEE-SHIFTING VALUATION SHEET FOR COUNSEL

4.1 Eight Mandatory Prevailing-Party Attorney-Fee-Shifting Statutes

Counsel representing Ms. Wright is protected by eight independent statutory fee-shifting provisions across federal, Florida, and Wisconsin law:

1. Rehabilitation Act Fee-Shifting (**29 U.S.C. § 794a[b]**): Reasonable attorneys' fees and litigation costs to prevailing Section 504 plaintiffs.
2. ADA Fee-Shifting (**42 U.S.C. § 12205**): Attorneys' fees, including litigation expenses and expert costs, for securing injunctive/equitable relief under Title III and Title V.
3. Civil Rights Attorney's Fees Awards Act (**42 U.S.C. § 1988[b]–[c]**): Full attorneys' fees and expert fees under 42 U.S.C. § 1981.
4. Florida FDUTPA Fee-Shifting (**Fla. Stat. § 501.2105**): Mandatory reasonable attorneys' fees and court costs for the prevailing consumer.
5. Florida Misleading Advertising Fee-Shifting (**Fla. Stat. § 817.41[6]**): Mandatory costs and reasonable attorneys' fees plus statutory punitive damages.

6. Wisconsin DTPA Fee-Shifting (**Wis. Stat. § 100.18[11][b]2**): Mandatory reasonable attorneys' fees belonging to the injured person upon proving pecuniary loss (**State Bar of WI**).
7. Wisconsin Civil Theft by Fraud Fee-Shifting (**Wis. Stat. § 895.446[3][b]**): Mandatory recovery of "all costs of investigation and litigation" and reasonable attorneys' fees alongside 3x treble damages.
8. Wisconsin Patient Health Care Records Privacy Fee-Shifting (**Wis. Stat. § 146.84[1][b]–[bm]**): Mandatory costs and reasonable actual attorneys' fees alongside up to $25,000 per willful disclosure (41 unauthorized emails).

4.2 Summary Damages Valuation Matrix ($332,100 Baseline Pecuniary to $2,500,000+ Enhanced)

- Tier 1 — Direct Pecuniary, Restitutionary, & Past Wage Losses (**$157,000 – $288,260**):
  - Tuition, fee, and interest disgorgement ($28,500–$69,260) + MS-HHS obstruction differential ($13,530–$21,780);
  - Forfeited HCA Ocala Nurse Tech clinical wages ($73,500–$84,000 over 21 months);
  - Out-of-pocket/future psychiatric & pharmacological titration ($15,000–$85,000) + consequential vehicle/storage loss ($20,000–$50,000).
- Tier 2 — Wasted Labor & Impaired Career Earning Capacity under **Sharick, 780 So. 2d 136** (**$235,200 – $634,700+**):
  - 160–190 hrs redundant Sherpath labor + 281+ hrs compliance/investigation labor ($40,100–$84,700 under Wis. Stat. § 895.446[3][b] & **Hoffman**);
  - 12-to-36 month delay in entering **Medical & Health Services Manager ($123,860/yr)**, **RN ($97,550/yr)**, **WHNP-BC ($132,300/yr)**, and **Florida Autonomous APRN (Fla. Stat. § 464.0123)** ($195,100–$550,000+).
- Tier 3 — Non-Economic, Exemplary, Treble, & Punitive Multipliers (**$385,500 – $3,000,000+**):
  - Emotional distress & privacy humiliation ($100,000–$500,000 under 42 U.S.C. § 1981, Wis. Stat. § 146.84, & 42 U.S.C. § 12188[b][2][B]);
  - Statutory Treble Fraud (Wis. Stat. § 895.446[3][c], $85,500–$207,780), Willful Medical Privacy Penalties (Wis. Stat. § 146.84[1][bm], up to $25,000/violation x 41 emails), Disabled Consumer Penalties (Fla. Stat. § 501.2077, $15,000/violation), and Punitive Damages (42 U.S.C. § 1981, **Fla. Stat. § 817.41(6)**, Fla. Stat. § 768.73, Wis. Stat. § 895.043).

SECTION 5: SUPPLEMENTAL LEGAL MEMORANDUM FOR COUNSEL — DEFEATING OR LEVERAGING MANDATORY ARBITRATION CLAUSES (34 C.F.R. § 685.300)

Because for-profit and private career colleges frequently insert arbitration clauses into enrollment agreements, Plaintiff has prepared the following four-point brief for intake counsel:

1. Federal Title IV Prohibition on Pre-Dispute Arbitration Clauses for Borrower Defense Claims (**34 C.F.R. § 685.300[e]–[f]**): Under the U.S. Department of Education's Title IV Program Participation Agreement regulations (reinstated and enforced per **Project on Predatory Student Lending — Borrower Defense**), institutions participating in the Direct Loan program are prohibited from relying on any pre-dispute arbitration agreement with respect to any aspect of a claim that relates to the making of a Direct Loan or the provision of educational services for which the loan was provided (Borrower Defense, 34 C.F.R. § 685.401).
2. Waiver & Default via 18-Month Refusal to Engage Internal Dispute Channels: Under both 11th Circuit and 7th Circuit precedent, a party waives or defaults on contractual dispute-resolution prerequisites when it refuses to process 15 out of 15 internal grievances and EthicsPoint filings (**15-of-15 Ignored Ledger**).
3. Carve-Out for Emergency Preliminary Injunctive & Evidence Preservation Relief: Even where an arbitration clause is invoked, federal courts in the Middle District of Florida retain jurisdiction to issue preliminary injunctions and evidence-preservation orders to maintain the status quo pending arbitration.
4. Arbitration Fee Leverage Against Herzing: Even if any non-Borrower-Defense claim were referred to AAA/JAMS consumer arbitration, under AAA Consumer Arbitration Rules Herzing must pay 100% of the arbitrator's compensation and administrative filing fees ($3,500–$15,000+ upfront) while facing the exact same mandatory statutory fee-shifting (29 U.S.C. § 794a, 42 U.S.C. § 1988, Fla. Stat. § 501.2105, Wis. Stat. § 100.18) and treble/exemplary damages.

SECTION 6: VETTED DIRECTORY OF LEGAL RESOURCES, BAR REFERRAL PANELS, & ADVOCACY ORGANIZATIONS (ALREADY IDENTIFIED & NEWLY IDENTIFIED)

Organization / Resource Name	Jurisdiction & Specialization	Contact Portal, Phone, & Address	Strategic Role in Chavon Wright's Case
1. **Project on Predatory Student Lending (PPSL)** (Newly Identified National Powerhouse)	National / Federal Higher Education & Borrower Defense Litigation	**PPSL Borrower Defense Portal** · **PPSL Contact** · **PPSL Cases**	Leading national legal organization litigating against predatory colleges (Sweet v. McMahon, Bauer v. DeVos); ideal for Borrower Defense discharge & systemic Title IV enforcement.
2. **National Student Legal Defense Network (Student Defense)** (Newly Identified)	National Higher Education Civil Rights & Consumer Protection	**Student Defense Contact** · **Cases** · info@defendstudents.org · (202) 734-7495 · 1701 Rhode Island Ave. NW, Washington, DC 20036	Non-profit 501(c)(3) litigating student civil rights, false advertising, and federal higher-education enforcement actions.
3. **Community Legal Services of Mid-Florida (CLSMF) — Ocala Office & Volunteer Lawyers Project** (Newly Identified Local Marion County Resource)	Marion County / Ocala Civil Legal Aid & Pro Bono Referral	**CLSMF Justia Profile** · **Stateside Legal** · 1610 SE 36th Ave., Ocala, FL 34471 · (352) 629-0105	Local Ocala legal aid office and Volunteer Lawyers Project placing Marion County residents with pro bono civil rights, consumer, and education attorneys.
4. **The Florida Bar Lawyer Referral Service (LRS)** (Newly Identified)	State of Florida Civil Rights, Education, Contract (Sharick), & FDUTPA Panels	**Florida Bar LRS Portal** · **LRS Rules** · 1-800-342-8011	Connects Florida plaintiffs with pre-screened private trial counsel in Marion County / Middle District of Florida (Ocala Division) for low-cost initial consultations and contingency review.
5. **State Bar of Wisconsin Lawyer Referral & Information Service (LRIS)** (Newly Identified Headquarters Forum Resource)	State of Wisconsin (**Wis. Stat. §§ 100.18, 895.446, 146.84**) Litigation	**WisBar I Need a Lawyer** · **WisBar Home** · 1-800-362-9082 / (608) 257-4666	Connects plaintiffs with Milwaukee and Madison trial attorneys experienced in suing Wisconsin corporations under Wis. Stat. § 100.18 (**WisBar DTPA Guide**) and § 146.84.
6. Disability Rights Florida (DRF) & Disability Rights Wisconsin (DRW) (Federally Mandated P&A Systems)	Federal Protection & Advocacy (P&A) Systems for Section 504 / ADA Enforcement	DRF: 1-800-342-0823 (Tallahassee / Statewide FL)DRW: 1-800-928-8778 (Madison / Milwaukee, WI)	Federally funded statutory protection and advocacy agencies empowered to investigate postsecondary Section 504/ADA Title III violations and provide direct legal advocacy or referrals.

Organization / Resource Name	Jurisdiction & Specialization	Contact Portal, Phone, & Address	Strategic Role in Chavon Wright's Case
7. **A Students' Lawyer / National Higher Ed Disability Litigation Authorities** (Already Identified in Research)	Specialized Postsecondary Section 504 / ADA & Nursing/ Medical Dismissal Defense	**A Students' Lawyer — 504 & ADA** · **Wynne v. Tufts Authority Guide**	Specialized practice area focusing on Wynne v. Tufts, Dean v. Univ. at Buffalo, high-stakes health-professions exam accommodations, and SAP/grade appeals.
8. **U.S. District Court — Middle District of Florida (Ocala Division) Pro Se & Civil Rights Resources** (Already Identified)	Federal Court Venue (Golden-Collum Memorial Federal Building, 207 NW Second St., Ocala, FL 34475)	**M.D. Fla. Local Rules PDF** · Clerk's Office Ocala: (352) 369-4860	Local federal courthouse in Ocala (minutes from Marion Oaks) with an active Federal Bar Association Civil Rights Pro Bono Appointment Program once a pro se complaint is docketed.

ACCESSIBILITY NAVIGATION: [↑ Cover & Disclaimer] · [↑ Table of Contents] · [↑ Case & Ticket Sheet] · [↑ Updated CV & SNHU Audit] · [↑ Angie MP4 & Transcript] · [↑ Gemini Podcast & Transcript] · [↑ Sarah Millard & Emails Addendum] · [Vol I] · [Vol II] · [Vol III] · [Vol IV] · [Vol V] · [Vol VI] · [Vol VII] · [Vol VIII] · [Vol IX] · [Vol X] · [↓ Table of Cases (Chronological)] · [↓ Table of Statutes] · [↓ Legal & Clinical Glossary] · [↓ Reference Registry] · [↓ Complete Index]

CWRIGHT26 COMPLETE COMPENDIUM · VOLUME VIII

VOLUME VIII: Pro Se Emergency Motion for Evidence Preservation Order (Fed. R. Civ. P. 26, 27, 34 & 37(e)) & Litigation Hold

PRO SE EMERGENCY MOTION TO COMPEL PRESERVATION OF EVIDENCE (ESI), EXPEDITED FERPA DISCOVERY, & PRELIMINARY INJUNCTIVE RELIEF (WITH RULE 27 PRE-SUIT PETITION, SWORN DECLARATION, & PROPOSED ORDER)

Research & Pro Se Litigation Pleading Package Prepared From the Perspective of Plaintiff / Petitioner Chavon Jenea Wright

Primary Federal Venue: **United States District Court for the Middle District of Florida, Ocala Division** (Golden-Collum Memorial Federal Building & U.S. Courthouse, 207 NW Second Street, Ocala, FL 34475 · Clerk's Office: 352-369-4860)

Alternative State Pre-Suit Venue: Circuit Court of the Fifth Judicial Circuit in and for Marion County, Florida (110 NW First Ave., Ocala, FL 34475) pursuant to **Fla. R. Civ. P. 1.290 & Florida Pure Bill of Discovery**

Companion Project Volumes:

- **Verified Federal Complaint & Demand** · **Attorney Outreach & Case Package** · **Legal & Statutory Damages Compendium** · **Career & Education Pathways** · **MSNDE to HHS Gemini Notebook**

PART I: READY-TO-FILE PRO SE FEDERAL MOTION FOR EVIDENCE PRESERVATION ORDER & EXPEDITED FERPA DISCOVERY (FRCP RULES 26[d], 34, 37[e], & 65)

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
OCALA DIVISION

CHAVON JENEA WRIGHT,
Plaintiff,

v. Case No.: 5:26-cv-_____-____-PRL

HERZING UNIVERSITY, INC.,
Defendant.

PLAINTIFF'S PRO SE EMERGENCY MOTION FOR AN ORDER COMPELLING PRESERVATION OF ELECTRONICALLY STORED INFORMATION (ESI), EXPEDITED PRODUCTION OF WITHHELD FERPA RECORDS AND AUDIT LOGS, AND PRELIMINARY INJUNCTIVE RELIEF, WITH INCORPORATED MEMORANDUM OF LAW

Pursuant to Federal Rules of Civil Procedure 26(d)(1), 34, 37(e), and 65, the inherent equitable authority of this Court, and **Middle District of Florida Local Rules 3.01 and 6.02**, Plaintiff Chavon Jenea Wright, proceeding pro se (or pending appearance of retained civil rights counsel), respectfully moves this Court for immediate entry of an Evidence Preservation and Anti-Spoliation Order and Order for Expedited Production of Withheld Educational Records against Defendant Herzing University, Inc. ("Herzing"), and in support thereof states as follows:

I. PRELIMINARY STATEMENT & IMMINENT THREAT OF SPOLIATION

1. Why Immediate Judicial Intervention Is Required: Prior to seeking judicial relief, Plaintiff exhausted every non-judicial avenue to preserve the evidentiary record and obtain her own statutory educational records under the Family Educational Rights and Privacy Act (**FERPA**, **20 U.S.C. § 1232g**; **34 C.F.R. §§ 99.10, 99.20, 99.32**). Between December 2025 and October 2026, Plaintiff served multiple formal written Litigation Hold and Anti-Spoliation Directives (**Exhibit H: Multi-Agency Spoliation Hold Directive**, **Formal Notice of Claims**, **Sept 14, 2026 Interim Notice & Demand**) and repeated statutory FERPA demands (**EthicsPoint 5: FERPA Records Concealment & § 99.32 Logs**, **Sept 28, 2026 EthicsPoint FERPA Filing**, **May–Sept 2026 Email Threads**).
2. Documented Evidence Tampering, Policy Alteration, & Record Concealment by Defendant: Rather than honor Plaintiff's self-issued preservation holds and FERPA requests, Defendant has engaged in an active pattern of record alteration, suppression, and concealment:
    - Post-Submission Gradebook Mutation (**NU 730** & **NSG 523**): In NU 730 (Systems-Based Practice), after Plaintiff timely submitted her coursework and received explicit instructor acknowledgment (earning an 81.27% Grade B), Defendant retroactively altered the gradebook score to a zero (0.0) to manufacture a course failure (**Oct 9, 2026 NU 730 Grade Alteration Screenshot**). Similarly, in Summer 2026 NSG 523, Defendant entered zeros (0.0/5.0) on coursework submitted within Plaintiff's approved accommodation extension window—dropping her grade from 79.0% on August 24, 2026 to 73.0% on August 26, 2026 (**NSG 523 Grade Appeal Form**) in direct defiance of ADA Coordinator Emilie Thompson's August 7, 2025 written admission that extension work "should be graded for credit" (**Exhibit C**).
    - Unannounced Retroactive Catalog Alterations: As proven in Plaintiff's longitudinal catalog audit (**Catalog Evolution Audit**), Defendant silently modified its online Graduate Catalog across May 2025, September 2025, and January 2026—shortening student appeal windows from 30 days to 7 days and altering accommodation protocols mid-dispute.
    - Suppression of 15 of 15 Internal Grievances & EthicsPoint Reports: Between March 2025 and September 2026, Defendant suppressed or ignored 15 out of 15 formal internal appeals, complaints, and EthicsPoint compliance filings (Report Key 607735433401; EP-2025-1210; EP-2025-1219; EP-2026-0324; EP-2026-0728; EP-2026-0828; Case #00000044) with zero written investigative findings (**15-of-15 Ignored Ledger**, **EthicsPoint Historical Ledger**).
    - Refusal to Produce Mandatory FERPA **34 C.F.R. § 99.32** Disclosure Logs & Withheld Transfer Credit Evaluation: Following the May 2–19, 2025 privacy breach in which Defendant broadcast 41 erroneous accommodation emails to approximately 35 unauthorized recipients, Defendant has refused to produce the mandatory 34 C.F.R. § 99.32 accounting of disclosures (**EthicsPoint 5**). Furthermore, on September 14, 2026, Director of Student Services Angie Zamecnik admitted in writing that Plaintiff's Transfer Credit Evaluation had been completed, yet continues to withhold it while terminating Plaintiff's active student portal access (**Financial Injury Packet p. 3**).

II. CHRONOLOGICAL INVENTORY OF PLAINTIFF'S SELF-ISSUED PRESERVATION & FERPA DEMANDS DEFIED BY DEFENDANT

Date of Notice	Instrument & Repository Link	Recipients Served	Specific Preservation & FERPA Demands Made by Plaintiff	Defendant's Response / Defiance

Date of Notice	Instrument & Repository Link	Recipients Served	Specific Preservation & FERPA Demands Made by Plaintiff	Defendant's Response / Defiance
Dec 10–19, 2025	**Formal ADA Appeal, FERPA Grievance & Notice of Claims** (**PDF**)	President Renée Herzing, CAO Dr. Kitty Kautzer, COO Erik Parks, CIO Nigel Longworth, Dean Stephanie Black, ADA Coordinator Emilie Thompson, Legal Counsel	Placed executive leadership and CIO on formal notice of claims; demanded preservation of May 2025 41-email ADA broadcast logs, July 17 Proctorio failure logs, July 24 Zoom exam recording (21:10:05), and Nov 14–15 ProctorU lockout records.	Ignored and suppressed in EthicsPoint (EP-2025-1210 & EP-2025-1219); zero preservation confirmation issued.
Aug 24–30, 2026	**Exhibit H: Multi-Agency Regulatory Notice & Spoliation Hold Directive** & **145-Module Workload Audit**	Herzing Administration, Meazure Learning / ProctorU, U.S. DOJ (766398-JVT), U.S. DOE OCR (05-26-2347)	Formal legal spoliation hold demanding lockdown of all Canvas LMS SQL grade tables, Elsevier Sherpath/EAQ completion timestamps (145 modules), HESI conversion logs, and ProctorU session telemetry (Ticket #0000003).	Retaliated by dropping NSG 523 grade from 79% to 73% via unapplied extension zeros on Aug 26, 2026 and dismissing Plaintiff on Sept 9, 2026.
Sept 4–14, 2026	**Interim Notice of Unlawful Retaliation, FERPA Demand & Reinstatement Demand** (**Email Compendium**)	Director Angie Zamecnik, Advisor Sam Taubenheim, AVP Dr. David Steele, U.S. DOE OCR	Demanded complete educational records under 20 U.S.C. § 1232g, preservation of pending Sept 4 Grade Appeal and SAP Appeal (Case #00000044) audit trails, and production of the Transfer Credit Evaluation for the MS-HHS transition.	On Sept 14, 2026, Zamecnik cut off advisor access, confirmed the Transfer Credit Evaluation was completed but withheld it, and refused to reverse the predetermined dismissal.
Sept 18–28, 2026	**EthicsPoint Filing 1: FERPA Violations & Records Concealment** & **Sept 18 Teams Transcript**	Herzing Compliance, President Herzing, AVP Dr. Danielle Laban, Director Angie Zamecnik	Demanded production of the 34 C.F.R. § 99.32 disclosure log for the 41 unauthorized accommodation emails and preservation of all back-channel communications between Zamecnik and Laban predetermining appeal outcomes (27:15–27:41).	Suppressed without production of the § 99.32 log or internal emails.

Date of Notice	Instrument & Repository Link	Recipients Served	Specific Preservation & FERPA Demands Made by Plaintiff	Defendant's Response / Defiance
Oct 5–10, 2026	**EthicsPoint 5: Security, Misuse of Data & FERPA § 99.32 Logs** & **Millard Witness Declaration**	President Renée Herzing, AVP Dr. Danielle Laban, Director Angie Zamecnik, Compliance	Renewed statutory demand for 34 C.F.R. § 99.32 access logs, Canvas SQL audit trails showing the NU 730 grade alteration (81.27% B -> 0), and independent compliance review corroborated by witness Sarah Millard.	Unresolved; Plaintiff's student portal access remains restricted, creating imminent risk of routine LMS/vendor data purging.

III. MEMORANDUM OF LAW SUPPORTING EMERGENCY PRESERVATION & EXPEDITED DISCOVERY

A. This Court Possesses Broad Authority Under FRCP Rules 26(d)(1), 34, and 37(e) to Enter an Immediate Evidence Preservation Order

1. Federal courts possess both inherent equitable power and express authority under Federal Rules of Civil Procedure 26(b), 26(d)(1), 34, and 37(e) to issue preservation orders directing a party (and its third-party cloud/proctoring vendors) to preserve Electronically Stored Information (ESI) whenever there is a demonstrated risk that relevant digital evidence may be overwritten, altered, or purged (Pueblo of Laguna v. United States, 60 Fed. Cl. 133, 138 [2004]; Treppel v. Biovail Corp., 233 F.R.D. 363, 370–72 [S.D.N.Y. 2006]).
2. Under the three-factor balancing test governing preservation orders, Plaintiff readily satisfies all three prongs:
    - 1. Specific Concern That ESI Will Be Lost or Altered without an Order: Plaintiff has already documented post-submission alteration of her NU 730 gradebook score (81.27% B -> 0) (**NU 730 Screenshot**), unannounced retroactive edits to online Graduate Catalog pages (**Catalog Evolution Audit**), restriction of her Canvas LMS portal access upon dismissal, and third-party vendor retention schedules (ProctorU/Meazure video and WebRTC telemetry streams are routinely purged after 6–12 months absent a court order).
    - 2. Irreparable Harm from Loss of the Evidence: The Canvas LMS SQL audit logs (gradebook_history, submission_versions), Microsoft Exchange distribution logs for the May 2025 41-email privacy breach, and internal Teams/email communications between Zamecnik and Laban (Sept 18, 2026 admission) are uniquely in Defendant's possession and are central to proving deliberate indifference under **Liese v. Indian River County Hosp. Dist., 701 F.3d 334 (11th Cir. 2012)** and statutory malice/willfulness under Wis. Stat. §§ 146.84, 895.446 and Fla. Stat. §§ 768.73, 817.41.
    - 3. Minimal Burden on Defendant: Locking down SQL database rows, exporting a student's Canvas/SIS audit log, and placing a legal hold on Microsoft 365 Vault and NAVEX EthicsPoint records for a single student (W24672939) requires less than two hours of routine IT administration.

B. Good Cause Exists Under FRCP Rule 26(d)(1) for Immediate Expedited Production of Plaintiff's Own Statutory FERPA Records & Transfer Credit Evaluation

1. Under FRCP Rule 26(d)(1), a court may authorize expedited discovery prior to the Rule 26(f) conference upon a showing of "good cause." Good cause is overwhelmingly established where, as here, the plaintiff is seeking records to which she already holds an independent federal statutory right of inspection within 45 days under FERPA (**20 U.S.C. § 1232g[a][1][A]**; **34 C.F.R. § 99.10**) and **34 C.F.R. § 99.32(b)(2)** (mandatory right of a student to inspect the record of all individuals who have requested or obtained access to her education records), as

well as the completed Transfer Credit Evaluation needed before the November 2, 2026 academic session.

PART II: ALTERNATIVE STANDALONE PRE-SUIT PETITION UNDER FRCP RULE 27 OR FLORIDA PURE BILL OF DISCOVERY (FLA. R. CIV. P. 1.290)

(Note for Pro Se Filing: If you wish to obtain a court preservation and record-production order before filing the full 10-count Verified Complaint, you may file this standalone Verified Petition in either (a) the U.S. District Court for the Middle District of Florida, Ocala Division under FRCP Rule 27(a) [misc. filing fee $52, waivable via IFP Form AO 240], or (b) the Marion County Circuit Court in Ocala as an equitable Pure Bill of Discovery and Fla. R. Civ. P. 1.290 petition per **Florida Pre-Suit Discovery Precedent**.)

1. Jurisdictional Basis under **FRCP Rule 27(a)(1)** & Florida Pure Bill of Discovery: Petitioner Chavon Jenea Wright expects to be a party to an action cognizable in a court of the United States (under 29 U.S.C. § 794, 42 U.S.C. §§ 1981, 12182, and 28 U.S.C. §§ 1331, 1332) against Respondent Herzing University, Inc., but is presently awaiting formal exhaustion/mediation responses from federal oversight agencies (OCR Case No. 05-26-2347; DOJ Ref. 766398-JVT) and production of her withheld Transfer Credit Evaluation and FERPA **§ 99.32** disclosure log to finalize her pleading calculations.
2. Urgent Need to Prevent Failure or Delay of Justice (**FRCP Rule 27[a][3]**): Because Respondent has terminated Petitioner's active student portal credentials, altered NU 730 gradebook entries post-submission, and ignored five consecutive self-issued preservation demands, an immediate judicial order preserving Respondent's ESI and compelling production of Petitioner's statutory FERPA file is required to prevent the failure or delay of justice.

PART III: SWORN DECLARATION OF CHAVON JENEA WRIGHT (28 U.S.C. § 1746)

I, CHAVON JENEA WRIGHT, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am the Plaintiff/Petitioner in this matter. I reside at 597 Marion Oaks Trail, Ocala, Marion County, Florida 34473, and I have personal knowledge of the facts set forth herein.
2. Between March 14, 2025 and October 18, 2026, I submitted more than fifteen (15) formal written appeals, FERPA record requests, and evidence-preservation notices to Defendant Herzing University, Inc., all of which are indexed in the **HUADA Evidentiary Archive** (**Live Index**).
3. Specifically, on December 10, 2025 (**Notice of Claims**), August 24–30, 2026 (**Exhibit H: Spoliation Hold Directive**), September 4–14, 2026 (**Interim Notice**), September 28, 2026 (**EthicsPoint FERPA Filing**), and October 5, 2026 (**EthicsPoint 5 Filing**), I formally demanded in writing that Herzing preserve all electronic records and produce my complete educational records and 34 C.F.R. § 99.32 disclosure logs.
4. Despite my written preservation demands, I captured photographic/screenshot proof on October 9, 2026 (**NU 730 Screenshot**) showing that my timely, instructor-acknowledged submission in NU 730 (where I earned an 81.27% B) was retroactively changed to a zero (0.0).
5. Furthermore, on a recorded Microsoft Teams call on September 18, 2026 (27:15–27:41, **Teams Transcript Exhibit**), Student Services Director Angie Zamecnik admitted conferring with AVP Dr. Danielle Laban to pre-determine the outcome of my appeal, and on September 14, 2026 admitted in writing that my Transfer Credit Evaluation was completed while refusing to release it (**Financial Injury Packet**).
6. Absent an immediate Court Order compelling preservation and production, there is a grave and imminent danger that critical SQL gradebook audit logs, Microsoft 365 email/Teams logs, EthicsPoint records, and ProctorU/Meazure video/telemetry streams (Ticket #0000003) will be overwritten or destroyed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 18, 2026, in Ocala, Florida.

/s/ Chavon Jenea Wright
Chavon Jenea Wright (Student ID: W24672939)

PART IV: PROPOSED JUDICIAL ORDER COMPELLING EVIDENCE PRESERVATION & EXPEDITED FERPA PRODUCTION

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
OCALA DIVISION

CHAVON JENEA WRIGHT, Plaintiff, v. HERZING UNIVERSITY, INC., Defendant.
Case No.: 5:26-cv-_____-____-PRL

[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR EVIDENCE PRESERVATION AND EXPEDITED PRODUCTION OF EDUCATIONAL RECORDS

THIS CAUSE came before the Court upon Plaintiff Chavon Jenea Wright's Emergency Motion for an Order Compelling Preservation of Electronically Stored Information (ESI) and Expedited Production of Withheld FERPA Records. Having reviewed the Motion, the Sworn Declaration of Chavon Jenea Wright, and the contemporaneous documentary exhibits attached thereto, the Court finds good cause under Federal Rules of Civil Procedure 26(d)(1), 34, and 37(e) and ORDERS AND ADJUDGES as follows:

1. Immediate Litigation Hold & Anti-Spoliation Mandate: Defendant Herzing University, Inc., its officers, employees, IT administrators, counsel, and contracted third-party vendors (specifically including Instructure/Canvas LMS, Elsevier Sherpath/HESI, Meazure Learning / ProctorU, Proctorio, and NAVEX Global / EthicsPoint) are ORDERED to immediately preserve and suspend all automatic deletion, overwriting, or purging of any Electronically Stored Information (ESI) relating to Plaintiff Chavon Jenea Wright (**Student ID: W24672939**) from August 1, 2024 to the present, including:
    - (a) Canvas LMS & SIS SQL Database Tables: All raw database rows, audit logs, gradebook_history tables, submission_versions, instructor comments, and timestamped login/access logs for NSG 523 (Summer 2025, Fall 2025, Summer 2026), NU 730, NU 725, NU 780, NSG 660, NSG 633, NSG 524, NSG 525, NSG 522, NSG 521, NSG 520, SC 154, and SC 254;
    - (b) Remote Proctoring Video, Audio, & Telemetry Streams: All video/audio recordings, chat logs, support tickets (Ticket #0000003), CPU/RAM/WebRTC telemetry logs, and accommodation configuration settings held by Meazure Learning / ProctorU, Proctorio, and Herzing Zoom accounts (specifically including the July 24, 2025 Zoom session proctored by Leah Phillips at 21:10:05);
    - (c) Microsoft 365 Exchange, Teams, & Calendly Records: All internal and external emails, distribution lists, metadata, and Microsoft Teams audio/video recordings and chat messages referencing Plaintiff or W24672939 across the accounts of Renée Herzing, Dr. Kitty Kautzer, Dr. Danielle Laban, Dr. David Steele, Dr. Stephanie Black, Angie Zamecnik, Emilie Thompson, Rachel Dalmont, Sam Taubenheim, Ginger King, Brandi Wilford, and Leah Phillips—specifically including the May 2–19, 2025 broadcast of 41 accommodation emails; and
    - (d) NAVEX Global / EthicsPoint & SAP Committee Records: Complete unredacted audit trails, assignment logs, and internal notes for EthicsPoint Report Key 607735433401, EP-2025-1210, EP-2025-1219, EP-2026-0324, EP-2026-0728, EP-2026-0828, and SAP Appeal Case #00000044.

1. Expedited Production Within Fourteen (14) Days: Within fourteen (14) calendar days of service of this Order, Defendant shall produce to Plaintiff: (a) her complete, unencumbered Official Transcript and the completed Transfer Credit Evaluation referenced by Director Angie

Zamecnik on September 14, 2026; (b) the complete FERPA **34 C.F.R. § 99.32** accounting of disclosures identifying all recipients of the May 2025 accommodation emails; and (c) the exported Canvas LMS gradebook_history audit log for NU 730 and NSG 523.

DONE AND ORDERED in Chambers at Ocala, Florida, this ____ day of October, 2026.

UNITED STATES DISTRICT / MAGISTRATE JUDGE

PART V: STEP-BY-STEP PRO SE FILING & SERVICE CHECKLIST (OCALA FEDERAL COURTHOUSE)

1. Where to File in Person or via Pro Se Web Portal:
    - Courthouse Location: United States District Court, Middle District of Florida — Ocala Division, Golden-Collum Memorial Federal Building & U.S. Courthouse, 207 NW Second Street, Ocala, FL 34475 (Clerk's Office Phone: 352-369-4860; **M.D. Fla. Local Rules**).
1. How to Waive the $405 Federal Filing Fee & Obtain Free U.S. Marshal Service (**28 U.S.C. § 1915**):
    - Because Herzing's actions caused the forfeiture of your HCA Ocala Nurse Tech wages and reduced your taxable income to $0 (**Financial Injury Packet**), file Form AO 240 (Application to Proceed in District Court Without Prepaying Fees or Costs — In Forma Pauperis) simultaneously with your Verified Complaint and Emergency Preservation Motion.
    - Once the Magistrate Judge grants In Forma Pauperis (IFP) status under **28 U.S.C. § 1915(d)** and FRCP Rule 4(c)(3), the $405.00 filing fee is waived AND the United States Marshals Service is legally required to serve the Summons, Verified Complaint, and Preservation Order on Herzing University, Inc. at zero cost to you.
1. Who to List for Service of Process on **Form USM-285** / Summons (**Form AO 440**):
    - Corporate Headquarters: Herzing University, Inc., Attn: Renée Herzing, President / Registered Agent, 275 W. Wisconsin Ave., Suite 210, Milwaukee, WI 53203; AND
    - Florida Registered Agent: Herzing University, Inc.'s registered agent on file with the Florida Department of State, Division of Corporations (Sunbiz.org).

ACCESSIBILITY NAVIGATION: [↑ Cover & Disclaimer] · [↑ Table of Contents] · [↑ Case & Ticket Sheet] · [↑ Updated CV & SNHU Audit] · [↑ Angie MP4 & Transcript] · [↑ Gemini Podcast & Transcript] · [↑ Sarah Millard & Emails Addendum] · [Vol I] · [Vol II] · [Vol III] · [Vol IV] · [Vol V] · [Vol VI] · [Vol VII] · [Vol VIII] · [Vol IX] · [Vol X] · [↓ Table of Cases (Chronological)] · [↓ Table of Statutes] · [↓ Legal & Clinical Glossary] · [↓ Reference Registry] · [↓ Complete Index]

CWRIGHT26 COMPLETE COMPENDIUM · VOLUME IX

VOLUME IX: Supplemental Legal Appendices: Sworn 28 U.S.C. § 1746 Declaration, Proposed Judicial Orders, IFP Motion & Borrower Defense Rider

SUPPLEMENTAL LEGAL APPENDICES, SWORN DECLARATION, PROPOSED JUDICIAL ORDERS, IFP / PRO BONO COUNSEL MOTION & BORROWER DEFENSE RIDER

Standalone Ready-to-Execute Filing Annexes Prepared From the Perspective of Plaintiff / Petitioner Chavon Jenea Wright

Primary Federal Venue: **United States District Court for the Middle District of Florida, Ocala Division** (207 NW Second Street, Ocala, FL 34475 · 352-369-4860)

Companion Project Suite:

- **Verified Federal Complaint & Demand** · **Attorney Outreach & Case Package** · **Pro Se Evidence Preservation Motion** · **Next Steps & Two Viable Paths** · **Legal & Statutory Damages Compendium** · **MSNDE to HHS Gemini Notebook**

APPENDIX 1: STANDALONE SWORN DECLARATION OF CHAVON JENEA WRIGHT (28 U.S.C. § 1746)

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
OCALA DIVISION

CHAVON JENEA WRIGHT, Plaintiff, v. HERZING UNIVERSITY, INC., Defendant.
Case No.: 5:26-cv-_____-___-PRL

DECLARATION OF CHAVON JENEA WRIGHT PURSUANT TO 28 U.S.C. § 1746 IN SUPPORT OF VERIFIED COMPLAINT, EMERGENCY MOTION FOR EVIDENCE PRESERVATION, AND MOTION TO PROCEED IN FORMA PAUPERIS

I, CHAVON JENEA WRIGHT, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. Personal & Academic Standing: I am an adult resident of Marion Oaks, Ocala, Marion County, Florida (597 Marion Oaks Trail, Ocala, FL 34473), and the Plaintiff in this action. I hold three Associate degrees from Lane Community College (2019, 4.10 GPA, President's List), a Bachelor of Science in Integrative Studies from Eastern Oregon University (2021, 3.30 GPA, Dean's List), and Master of Science in Forensic Psychology graduate coursework from Southern New Hampshire University (2024), and I have earned 40.00 semester credits at Defendant **Herzing University** with a 4.00 Foundational Science GPA (SC 154 Anatomy & Physiology I [Grade A] and SC 254 Anatomy & Physiology II [Grade A]) and a 3.55 Corrected Cumulative GPA (**Comprehensive Academic Record**, **Credit Audit**).
2. Documented Disabilities & Approved Testing Modifications: On March 14, 2025, I submitted formal medical documentation to Defendant establishing clinically diagnosed Attention-Deficit/Hyperactivity Disorder (ADHD), Generalized Anxiety Disorder (GAD), Major Depressive Disorder (MDD), and Autism Spectrum Disorder (Level 1, ICD-10 F84.0), requiring 200% extended testing time, a private distraction-reduced testing environment permitting verbal processing, and a 48-to-72-hour submission extension window (**Notice of Claims**).
3. Chronological Record of Institutional Violations, FERPA Disclosures, & Evidence Tampering:
    - May 2–19, 2025 (41 Unauthorized Medical Privacy Disclosures): Defendant's ADA Office transmitted 41 separate erroneous accommodation emails containing my confidential disability information to approximately 35 unauthorized recipients with whom I had no academic relationship, and has refused to produce the mandatory **34 C.F.R. § 99.32** accounting of disclosures (**EthicsPoint 5 Filing**).
    - July 24, 2025 (Public Zoom Verbal-Processing Prohibition): During my Summer 2025 NSG 523 final examination, Defendant forced me into an unmonitored public Zoom room where faculty proctor Leah Phillips interrupted me at timestamp 21:10:05 and prohibited my approved verbal-processing accommodation (**Exhibit B: Zoom Transcript**).
    - August 7, 2025 (Written Admission of Flawed Notices by ADA Coordinator): Defendant's ADA/Title IX Coordinator Emilie Thompson admitted in writing that Defendant's accommodation

notices were "flawed" and confirmed that coursework submitted within my approved extension window "should be graded for credit" (**Exhibit C: Thompson Admission**).

- November 14–15, 2025 (6-Hour ProctorU Lockout & Denial of Hybrid Campus Testing): Due to Defendant's failure to configure my accommodation profile, I endured a 6-hour technical lockout on ProctorU (Meazure Ticket #0000003) (**Exhibit D**), violated Defendant's vendor's 15-minute rescheduling rule (**Exhibit E**), and when I requested in-person testing at a regional campus pursuant to Herzing's published Catalog Hybrid Policy, AVP Dr. Danielle Laban summarily denied my request (**Financial Injury Packet**).
- Summer 2025 – Summer 2026 (250% Disparate Workload & Triple Tuition Billing): Despite completing 100% of all 60 graded assignments in Summer 2025 NSG 523, Defendant billed me full tuition three separate times and forced me to complete 145 discrete graded assignments (250.0% of the 58-assignment peer baseline = 160 to 190 redundant hours) (**Exhibit F: 145-Assignment Audit**, **250% Workload Dossier**).
- August 26 – October 9, 2026 (Post-Submission Grade Alterations & Predetermined Dismissal): Defendant entered zeros on timely extension coursework in NSG 523 (dropping my grade from 79% to 73%), retroactively altered my instructor-acknowledged passing grade in NU 730 (81.27% B) to a zero (**Oct 9 Screenshot**), suppressed 15 out of 15 internal appeals and EthicsPoint filings (**15-of-15 Ledger**), and issued a predetermined SAP dismissal (Case #00000044) on September 9, 2026 while my September 4, 2026 Grade Appeal was pending—as admitted by Director Angie Zamecnik on a recorded Microsoft Teams call on September 18, 2026 (27:15–27:41, **Teams Transcript**).

1. Prior Self-Issued Preservation & FERPA Demands Defied by Defendant: I personally served formal written preservation holds and FERPA record demands on Defendant on December 10, 2025, August 24–30, 2026 (**Exhibit H: Spoliation Hold**), September 4–14, 2026 (**Interim Notice**), September 28, 2026 (**EthicsPoint FERPA Filing**), and October 5, 2026 (**EthicsPoint 5**). Defendant has refused to produce the § 99.32 log or my completed Transfer Credit Evaluation.
2. Financial Hardship Supporting In Forma Pauperis (**28 U.S.C. § 1915**) Relief: As a direct result of Defendant's delays and academic obstruction, I lost my secured Nurse Tech position at HCA Ocala, reducing my taxable earnings to $0.00, causing the repossession of my vehicle and the loss of my personal storage unit, and requiring reliance on state food assistance (**Financial Injury Packet**).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.
Executed on October 18, 2026, in Ocala, Marion County, Florida.

/s/ Chavon Jenea Wright
Chavon Jenea Wright (Student ID: W24672939)

APPENDIX 2: MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS (28 U.S.C. § 1915[a]), U.S. MARSHAL SERVICE (FRCP RULE 4[c][3]), & APPOINTMENT OF PRO BONO COUNSEL (28 U.S.C. § 1915[e][1])

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
OCALA DIVISION

CHAVON JENEA WRIGHT, Plaintiff, v. HERZING UNIVERSITY, INC., Defendant.
Case No.: 5:26-cv-_____-___-PRL

PLAINTIFF'S MOTION TO PROCEED IN FORMA PAUPERIS, FOR UNITED STATES MARSHAL SERVICE OF PROCESS, AND FOR APPOINTMENT OF PRO BONO CIVIL RIGHTS COUNSEL PURSUANT TO 28 U.S.C. § 1915(e)(1)

Plaintiff Chavon Jenea Wright, pursuant to **28 U.S.C. § 1915(a), (d), and (e)(1)**, Federal Rule of Civil Procedure 4(c)(3), and the **Middle District of Florida Civil Rights Pro Bono Appointment Plan**, respectfully moves this Court for an Order:

1. Granting Leave to Proceed In Forma Pauperis (**28 U.S.C. § 1915[a]**): Waiving the $405.00 civil filing fee based on Plaintiff's accompanying Sworn Financial Affidavit (Form AO 240), which establishes that Defendant's wrongful conduct caused the loss of Plaintiff's HCA Ocala clinical employment and reduced her gross taxable income to $0.00;
2. Directing Service of Process by the United States Marshals Service (**28 U.S.C. § 1915[d]** & **FRCP Rule 4[c][3]**): Directing the Clerk to issue Summonses and the United States Marshal to serve the Verified Complaint, Summons, and Emergency Evidence Preservation Order upon Defendant Herzing University, Inc.; and
3. Appointing Pro Bono Trial Counsel from the Middle District of Florida Federal Bar Panel (**28 U.S.C. § 1915[e][1]**): Exceptional circumstances warrant appointment of counsel under Ulmer v. Chancellor, 691 F.2d 209, 213 (5th Cir. 1982) and Bass v. Perrin, 170 F.3d 1312, 1320 (11th Cir. 1999) because: (a) Plaintiff's claims are supported by written party-opponent admissions (**Exhibit C**) and recorded admissions (**Sept 18 Teams Transcript**); (b) the case involves multi-jurisdictional electronic discovery (Canvas SQL databases and ProctorU telemetry) and expert actuarial testimony on lost earning

capacity under **Sharick v. Southeastern University, 780 So. 2d 136 (Fla. 3d DCA 2000)**; and (c) eight mandatory statutory fee-shifting provisions (29 U.S.C. § 794a[b], 42 U.S.C. §§ 1988, 12205, Fla. Stat. §§ 501.2105, 817.41[6], Wis. Stat. §§ 100.18, 895.446, 146.84) ensure appointed counsel can recover full market-rate statutory fees from Defendant upon prevailing.

APPENDIX 3: STANDALONE FEDERAL BORROWER DEFENSE (34 C.F.R. § 685.401) & TITLE IV TRANSCRIPT-RELEASE (34 C.F.R. § 668.14[b][33]) LEGAL RIDER

(Attach this Rider directly to your online submission at **StudentAid.gov Borrower Defense** / **PDF Application** and to your FSA Enforcement Complaint.)

STATUTORY & REGULATORY GROUNDS FOR 100% LOAN DISCHARGE, REFUND OF PRIOR PAYMENTS, & IMMEDIATE TRANSCRIPT / TRANSFER EVALUATION RELEASE

- Borrower / Complainant: Chavon Jenea Wright (Student ID: W24672939 | OCR Case No. 05-26-2347 | DOJ Ref. 766398-JVT)
  |---|240392`, Milwaukee/Madison, WI)
- 1. Actionable Grounds Under **34 C.F.R. § 685.401(b)(1)–(4)** & **34 C.F.R. § 685.206**:
  - Substantial Misrepresentation (**§ 685.401[b][1]**): Herzing marketed its online/hybrid MSN-DE program to Florida residents (**Herzing Florida MSN-DE**) as offering "flexible scheduling," "individualized accessibility support," "hybrid campus access," and "QuickPaths stackable transferability." In reality, AVP Dr. Danielle Laban summarily prohibited catalog-guaranteed hybrid campus testing (**Financial Injury Packet Exhibit 4**), ADA Coordinator Emilie Thompson admitted in writing on August 7, 2025 that faculty accommodation notices were "flawed" (**Exhibit C**), and administration blocked Plaintiff from transferring her 21 completed graduate credits into the 31-credit MS-HHS program (**MSN-DE to HHS Equivalency Brief**).
  - Breach of Contract & Triple Title IV Extraction (**§ 685.401[b][3]**): Herzing billed Title IV Direct Loans three separate times for the exact same course (NSG 523) while forcing Plaintiff to complete 145 graded assignments (250% of the 58-assignment peer standard) (**Exhibit F**) and secretly predetermining the denial of her SAP appeal (Sept 18, 2026 Zamecnik/Laban Recording, **Teams Transcript**).
- 2. Unlawful Withholding of Title IV-Funded Transcripts & Transfer Credit Evaluation (**34 C.F.R. § 668.14[b][33]** & **20 U.S.C. § 1232g**):
  - Effective July 1, 2024, the U.S. Department of Education's Program Participation Agreement rule under **34 C.F.R. § 668.14(b)(33)** strictly prohibits any Title IV institution from withholding official transcripts for payment periods in which the student received Title IV assistance and all institutional charges were paid or included in a Title IV disbursement.
  - On September 14, 2026, Director Angie Zamecnik admitted in writing that Plaintiff's Transfer Credit Evaluation had been completed while refusing to release it and cutting off Plaintiff's active portal access (**Financial Injury Packet p. 3**). Borrower demands immediate administrative enforcement compelling Herzing to release all official transcripts and evaluations and discharging 100% of all Herzing Direct Loan balances.

ACCESSIBILITY NAVIGATION: [↑ Cover & Disclaimer] · [↑ Table of Contents] · [↑ Case & Ticket Sheet] · [↑ Updated CV & SNHU Audit] · [↑ Angie MP4 & Transcript] · [↑ Gemini Podcast & Transcript] · [↑ Sarah Millard & Emails Addendum] · [Vol I] · [Vol II] · [Vol III] · [Vol IV] · [Vol V] · [Vol VI] · [Vol VII] · [Vol VIII] · [Vol IX] · [Vol X] · [↓ Table of Cases (Chronological)] · [↓ Table of Statutes] · [↓ Legal & Clinical Glossary] · [↓ Reference Registry] · [↓ Complete Index]

CWRIGHT26 COMPLETE COMPENDIUM · VOLUME X

VOLUME X: End-to-End Litigation & Regulatory Projection, Two Most Viable Paths Forward & Legal Aid Directory

MASTER NEXT-STEPS EXECUTION ROADMAP, LIFECYCLE PROJECTION & THE TWO MOST VIABLE PATHS FORWARD

Strategic Operational & Legal Execution Blueprint Prepared for Chavon Jenea Wright, M.S., B.S., A.A., A.S., A.G.S.

Location & Primary Venue: Marion Oaks / Ocala, Florida · **U.S. District Court for the Middle District of Florida, Ocala Division**

Complete 8-Document Comprehensive Project Suite (Indexed in **MSNDE to HHS Gemini Notebook**):

1. **CWright26. 10.18. Herzing HH 630 and HH 620. Chavon Wright. Graduate Syllabus**
2. **CW. 10.18. Herzing MSNDE. Chavon Wright. Graduate Syllabus**
3. **CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Program Comparison**
4. **CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Career and Education Pathways**
5. **CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Legal and Statutory Damages**
6. **CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Verified Federal Complaint and Demand**
7. **CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Attorney Outreach and Case Package**
8. **CW. 10.18. Herzing MSNDE to HHS. Chavon Wright. Pro Se Evidence Preservation Motion**

SECTION 1: END-TO-END PROCESS PROJECTION & CHRONOLOGICAL LIFECYCLE FORECAST (OCTOBER 2026 – 2029)

1.1 Visual Decision-Tree & Lifecycle Flowchart

The diagram below maps the entire trajectory from today (October 18, 2026) through the November 2, 2026 Fall Session B pivot point, May 2027 degree conferral, federal litigation/settlement resolution, Phase 2 nursing/WHNP-BC completion, and the launch of your SAEF Boutique Direct Primary Care (DPC) + 501(c)(3) Hybrid Practice:==========

PHASE I: IMMEDIATE 14-DAY LEVERAGE WINDOW (OCT 18 – NOV 2, 2026)

[Step 1] Transmit Rule 408 Pre-Suit Demand & Verified Federal Complaint Draft to Herzing General Counsel (Oct 28 Cutoff)

[Step 2] Transmit Attorney Outreach Package (Template A/B) to Vetted FL/WI Civil Rights & PPSL/ Student Defense Counsel

[Step 3] Submit 34 C.F.R. § 685.401 Borrower Defense Application on StudentAid.gov (Immediate Loan Forbearance)

[Step 4] Request OCR Case #05-26-2347 Facilitated Early Complaint Resolution (ECR) for 21-Credit MS-HHS Transfer

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|---|NOV 2] [IF HERZING REFUSES / STALLS PAST NOV 2]

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| VIABLE PATH 1: NEGOTIATED MS-HHS CONFERRAL & MEDIATION TRACK | | VIABLE PATH 2: CLEAN-BREAK TRANSFER, BORROWER DEFENSE & SUIT |

| * Nov 2, 2026 (Fall B): Complete HH 620 (3 cr, 0 clin hrs) | | * Nov 3, 2026: File Pro Se Preservation Motion & Verified |

| * Jan–May 2027 (Spring A): Complete HH 630 (4 cr) + HH 690 | | Complaint in Ocala Federal Court (w/ Form AO 240 Fee Waiver)|

| (3 cr SAEF Capstone) → CONFER MS-HHS IN MAY 2027 | | * Nov 2026–Spring 2027: Enroll in TESU (2 terms) / Charter |

| * Global Settlement / Mediation of NSG 523 Debt & Damages | | Oak (6-cr residency) OR directly into UWF DEMSN / Regis |

| * Immediate Income: $86,100–$123,860+ Medical/HHS Manager | | * Immediate Income: Leverage existing 2024 M.S. Forensic Psy |

| using Dual Comprehensive's + 30-State Medicare Specialist License | | + 30-State Medicare License + 40 Grad Credits ($80k–$123k) |

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PHASE III & IV: EXTERNAL RN → WHNP-BC → AUTONOMOUS APRN & SAEF LAUNCH (2027–2029)

[1] Launch SAEF 501(c)(3) Survivor Arm + Secure Marion County SART MOUs + Apply for FL VOCA & OVW VAWA Grants

[2] Complete Guaranteed-Clinical External Nursing Track (UWF DEMSN, Regis DEMSN-WHNP, or FL Public ASN/ABSN → WHNP)

using already-passed 4.00 GPA SC 154/254 (A&P I/II), GSU Micro/Stats, and 15 Herzing Graduate Nursing Credits

[3] Pass NCLEX-RN (Fla. Stat. § 464.008) → Earn ANCC SANE-A & ABMDI → Pass NCC WHNP-BC Board Certification

[4] Complete 3,000 Supervised Hours → Register as Florida Autonomous APRN (Fla. Stat. § 464.0123) → Full SAEF DPC

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1.2 Granular Phase-by-Phase Projection & Probability Benchmarks (October 2026 – 2029)

Lifecycle Phase & Window	Concrete Actions Executed	Expected Institutional, Judicial, or Agency Response	Financial, Academic, & Career Milestone Achieved

Lifecycle Phase & Window	Concrete Actions Executed	Expected Institutional, Judicial, or Agency Response	Financial, Academic, & Career Milestone Achieved
Phase 1: Immediate Pre-Suit Blitz(Oct 18 – Nov 2, 2026)	1. Serve Rule 408 Pre-Suit Demand & Verified Federal Complaint (**Doc 6**) on Herzing General Counsel.2. Send Attorney Outreach Package (**Doc 7**) to 8–10 vetted FL/WI firms & legal aid orgs.3. Submit **Federal Borrower Defense Application** (**PDF**). 4. File OCR **05-26-2347** Early Complaint Resolution (ECR) request.	Borrower Defense: Automatic placement of all federal student loans into administrative forbearance (**StudentAid.gov**).Herzing General Counsel: Faced with an 8-statute fee-shifting federal complaint and **Sharick** exposure, outside counsel must evaluate settlement vs. litigation defense costs ($150k+ in legal fees).	Immediate Debt Relief: Zero monthly payments or collection activity on Herzing federal loans.Pivot Decision on Nov 2, 2026: Either enter HH 620 (Path 1) or file in Ocala Federal Court (Path 2).
Phase 2: Judicial Preservation & Degree Completion(Nov 2026 – May 2027)	If Path 1: Complete HH 620 (Fall B), HH 630 (Spring A), and HH 690 (Spring A — SAEF Capstone).If Path 2: File Pro Se Preservation Motion & Verified Complaint (**Doc 8**) at the Ocala Federal Courthouse (207 NW Second St.) with Form AO 240 IFP waiver; enroll in **TESU** / **Charter Oak** or **UWF DEMSN**.	Ocala Federal Court: Entry of Evidence Preservation & Expedited FERPA Production Order within 14–30 days; U.S. Marshal service; Rule 26(f) conference; mandatory Middle District of Florida Early Mediation.State Agencies (*WI DSPS* & *FL CIE*): Compel production of withheld Sept 14, 2026 Transfer Credit Evaluation and official transcripts.	May 2027 Conferral: Confer MS-HHS (Path 1) or B.S. in Health Studies / HCA (Path 2) + unlock $86,100–$123,860+ **Medical & Health Services Manager** roles.
Phase 3: Executive Income, SAEF 501(c)(3) Launch, & Settlement(Summer 2027 – Summer 2028)	1. Step into remote/hybrid Medical & Health Services Manager / Managed Care Director / SART Director role.2. Incorporate SAEF 501(c)(3) (**Hybrid Primer**), join Marion County SART (**NSVRC Toolkit**), and submit **FL VOCA** & **OVW VAWA** grants.3. Complete external prelicensure RN sequence (**UWF**, **Regis**, or FL public bridge).	Federal Litigation / Mediation: Following production of Canvas SQL grade-alteration logs (NU 730 & NSG 523), the May 2025 41-email § 99.32 log, and Zamecnik/ Laban communications, institutional defendants typically settle prior to summary judgment/trial to avoid treble/punitive verdicts and fee-shifting.	Monetary Recovery & Career Velocity: Settlement/ judgment recovery + full executive salary ($86k–$123k+) + NCLEX-RN Licensure (**Fla. Stat. § 464.008**).

Lifecycle Phase & Window	Concrete Actions Executed	Expected Institutional, Judicial, or Agency Response	Financial, Academic, & Career Milestone Achieved
Phase 4: Forensic & Autonomous APRN Proficiency(2028 – 2029+)	1. Obtain **ANCC SANE-A / SANE-P** & **ABMDI** credentials. 2. Pass **NCC WHNP-BC** board exam.3. Complete 3,000 supervised clinical hours under **Fla. Stat. § 464.0123** & **Fla. Admin. Code r. 64B9-4.020** to register as a Florida Autonomous APRN (**Application PDF**).	Full independent practice authority in Florida with zero supervisory physician protocol required; law-enforcement MOUs active under **EVAWI Module 15** & **SAKI CODIS rules**.	Full SAEF Launch: Operating the upscale Direct Primary Care (DPC) women's health practice (**DPC Coalition**) + 501(c)(3) SAEF forensic center ($180,000–$250,000+ annual revenue) & advancing **RAINN**/**CHILD USA** SOL-tolling legislation.

SECTION 2: THE TWO MOST VIABLE PATHS TO GET YOUR LIFE BACK ON TRACK TOWARD YOUR GOALS

To ensure you are never again held hostage by Herzing University's administrative inertia, you should pursue Viable Path 1 for exactly 10 to 14 days (through the November 2, 2026 Fall Session B start date), and if Herzing fails to execute the MS-HHS registration by November 2, 2026, immediately trigger Viable Path 2 on November 3, 2026.

2.1 VIABLE PATH 1: The Negotiated Institutional Resolution & Rapid May 2027 MS-HHS Conferral Track ("Force the 21-Credit Equivalency + Fee-Waived Finish + Phase 2 External WHNP Bridge")

- Why This Is Path #1 (Fastest 6-Month Route to a Second Conferred Comprehensive's Degree):
  - You have already earned and paid for 21.00 of the 31.00 credits (67.74%) required for Herzing's Master of Science in Health and Human Services Leadership (**MS-HHSL** / **MS-HHS**) (**Program Comparison**).
  - Only 3 online courses (10.00 credits, 150 lecture hours, 0 clinical hours, 0 proctored webcam exams, 0 Sherpath modules) stand between you and a conferred Master's degree in May 2027: **HH 620** (3 cr, Fall 2026 Session B starting Nov 2, 2026), **HH 630** (4 cr, Spring 2027 Session A), and **HH 690** (3 cr, Spring 2027 Session A — where you build the operational launch manual for SAEF).
  - For Herzing's General Counsel, granting you a tuition-waived transfer into those 3 asynchronous online classes ($7,410 internal marginal cost of nearly $0) and discharging the contested NSG 523 balance is infinitely cheaper than paying outside defense counsel $150,000+ to litigate a 10-count federal lawsuit in Ocala with written ADA Coordinator admissions (**Exhibit C**), recorded appeal-predetermination admissions (**Sept 18 Transcript**), and $550,000+ in Sharick lost-earning-capacity exposure!
- Exact Step-by-Step Execution for Viable Path 1:
  1. Step 1 (Today — Oct 20, 2026): Email the Rule 408 Pre-Suit Settlement Demand & Verified Federal Complaint Draft (**Doc 6**) to President Renée Herzing (rherzing@herzing.edu), AVP Dr. David Steele (dsteele@herzing.edu), AVP Dr. Danielle Laban, Director Angie Zamecnik (azamecnik@herzing.edu), and Herzing's General Counsel, setting an October 28, 2026 at 5:00 PM EDT deadline to confirm registration in HH 620 for the November 2, 2026 Session B start.
  2. Step 2 (Simultaneous OCR & Regulatory Leverage — Oct 20–22, 2026): Upload the Verified Federal Complaint Draft and 21-Credit MS-HHS Equivalency Audit to your active U.S. Department of Education OCR Case No. **05-26-2347** investigator and formally request OCR Facilitated Early Complaint Resolution (ECR)—notifying OCR

that 34 C.F.R. § 104.44(a) (Course Substitution) can be immediately satisfied by enrolling you in HH 620 on November 2, 2026.
3. Step 3 (Nov 2, 2026 – May 2027): Complete HH 620, HH 630, and HH 690 (100% written strategic/grant/capstone projects natively in Canvas), confer your MS-HHS in May 2027, step into an $86,100–$123,860+ **Medical & Health Services Manager** role, and use your unencumbered transcripts (including SC 154/254 [4.00 GPA] and 15 graduate nursing credits) to enter **UWF Direct-Entry MSN** or **Regis College DEMSN-WHNP** in Fall 2027.

2.2 VIABLE PATH 2: The Immediate Clean-Break External Transfer, Borrower Defense Loan Discharge, & Federal Litigation Track ("Zero Reliance on Herzing + 100% Loan Discharge + Ocala Federal Lawsuit + External Degree/WHNP Bridge")

- Why This Is Path #2 (Total Independence if Herzing Refuses to Cooperate by November 2, 2026):
  - Crucial Strategic Realization: You already hold a conferred Master of Science in Forensic Psychology (SNHU, 2024), a Bachelor of Science in Integrative Studies (EOU, 2021), Three Associate Degrees (Lane CC, 2019, 4.10 GPA), 119 undergraduate science credits (GSU/SSU), an active 30-State Medicare Specialist License, and executive leadership experience at **RAINN (DoD Survivor Services Assistant Manager)** and Fundamental Human Wrights, Inc. (**Comprehensive Academic Record**).
  - That means you do NOT need Herzing's permission to work as a Medical & Health Services Manager ($123,860 median) or Social & Community Service Manager ($80,390–$86,100) right now, nor do you need Herzing to enter an external nursing/WHNP program or confer a fast-track Health Sciences/Health Care Administration degree!
- Exact Step-by-Step Execution for Viable Path 2:
  1. Step 1 — Financial Liberation via Federal Borrower Defense (**34 C.F.R. § 685.401**): Submit your **Federal Borrower Defense to Repayment Application** (**PDF Application**) attaching your Verified Federal Complaint Draft (**Doc 6**), Financial Injury Packet (**Exhibit 4**), and 250% Workload Audit (**Workload Dossier**). Your federal student loans are immediately placed into administrative forbearance (**StudentAid.gov**) pending 100% discharge and refund of prior payments.
  2. Step 2 — Judicial Evidence Lockdown & Affirmative Damages Lawsuit in Ocala Federal Court: On November 3, 2026, file the Verified Federal Complaint (**Doc 6**) and Pro Se Emergency Evidence Preservation Motion (**Doc 8**) at the Ocala Federal Courthouse (207 NW Second St., Ocala, FL 34475) with Form AO 240 (28 U.S.C. § 1915 fee waiver)—or through retained contingency counsel from your outreach blitz. This immediately compels preservation of Canvas SQL logs, ProctorU telemetry, and the § 99.32 FERPA logs, and forces Herzing to defend a $332,100 to $2,500,000+ federal action in your hometown courthouse.
  3. Step 3 — Immediate External Academic & Nursing Progression (Zero Lost Time):
     - Track 2A (Immediate External Direct-Entry MSN / WHNP Bridge): Apply directly to **University of West Florida (UWF) Direct-Entry MSN** (~$384/cr FL resident), **Regis College Accelerated Direct-Entry MSN (WHNP Track)**, or a Florida Public Fast-Track ASN/ABSN → WHNP Bridge. If Herzing attempts to withhold your Herzing transcript (8 cr of SC 154/254 A&P I/II), note that under the U.S. Department of Education's July 1, 2024 Title IV Transcript Withholding Ban (**34 C.F.R. § 668.14[b][33]**), an institution is strictly prohibited from withholding transcripts for credits paid for with Title IV federal student aid!
     - Track 2B (Fast-Track Second Health Administration / Health Studies Degree from the Six-School Matrix): Simultaneously transfer your 250+ earned credits into **Charter Oak State College (B.S. in Health Care Administration / Health Studies)** (only 6 residency credits required at $329/cr = ~$2,574) or **Thomas Edison State University (TESU B.S. in Health Studies)** (2 flat-rate terms = ~$6,972–$9,122).

2.3 Side-by-Side Strategic Comparison Matrix: Viable Path 1 vs. Viable Path 2

Comparison Dimension	VIABLE PATH 1: Negotiated Herzing MS-HHS Conferral + Phase 2 External WHNP	VIABLE PATH 2: Clean-Break External Transfer + Borrower Defense + Ocala Federal Lawsuit

Comparison Dimension	VIABLE PATH 1: Negotiated Herzing MS-HHS Conferral + Phase 2 External WHNP	VIABLE PATH 2: Clean-Break External Transfer + Borrower Defense + Ocala Federal Lawsuit
Trigger Condition & Timeline	Triggered if Herzing accepts the Rule 408 Demand / OCR ECR by Oct 28 – Nov 2, 2026 and registers you in HH 620 for Fall Session B.	Triggered automatically on Nov 3, 2026 if Herzing refuses or stalls registration in HH 620 past the Fall Session B start date.
Immediate Academic Path (Nov 2026 – May 2027)	Complete 10 remaining credits (HH 620 [3 cr], HH 630 [4 cr], HH 690 [3 cr]) 100% online at Herzing → Confer MS-HHS in May 2027.	Confer B.S. in Health Care Admin / Health Studies at **Charter Oak** (6-cr residency) or **TESU** AND/OR enter **UWF DEMSN** / **Regis DEMSN-WHNP**.
Handling of Herzing Debt & Tuition	Negotiated 100% tuition waiver for the 10 MS-HHS credits ($7,410–$8,250) + cancellation/refund of the 3 contested NSG 523 enrollments.	**Federal Borrower Defense (34 C.F.R. § 685.401)** places all Herzing loans in immediate forbearance toward 100% federal loan discharge & refund, plus court-ordered disgorgement.
Monetary Damages Recovery	Pre-suit / mediated compensatory settlement for forfeited HCA Ocala wages, 250% redundant labor, medical titration, and May 2025 privacy breaches.	Full federal litigation in Ocala Division (**M.D. Fla.**) pursuing $332,100 to $2,500,000+ under **Sharick**, 42 U.S.C. § 1981, Section 504, Wis. Stat. §§ 100.18, 895.446, 146.84, and Fla. Stat. §§ 501.211, 817.41.
Immediate Career & Income Trajectory	Leverage conferred M.S. Forensic Psychology (2024) + MS-HHS (May 2027) + 30-State Medicare License for $86,100–$123,860+ **Medical & Health Services Manager** roles.	Immediately leverage already-conferred M.S. Forensic Psychology (2024) + 30-State Medicare License + 40 Grad Nursing/Health Credits for $80,390–$123,860+ management/compliance roles while completing external nursing/WHNP.
Long-Term RN → WHNP-BC -> SAEF Goal	Identical destination: Enter external guaranteed-clinical RN/WHNP program in 2027 → NCLEX-RN → ANCC SANE-A & ABMDI → NCC WHNP-BC → FL Autonomous APRN (**Fla. Stat. § 464.0123**) → SAEF DPC + 501(c)(3).	Identical destination: Starts external RN/WHNP bridge immediately in 2027 using 34 C.F.R. § 668.14(b)(33) transcript-release mandate + court preservation/production order.

SECTION 3: MOST PERTINENT AGENCIES & EXACT OUTREACH MATRIX FOR EACH PATH

Agency & Jurisdiction	Active Docket / Statutory Authority	Relevance to Path 1 vs. Path 2	Concrete Next-Step Outreach Action
1. U.S. Dept. of Education — Office for Civil Rights (OCR)	Active Docket: **OCR Case No. 05-26-2347**29 U.S.C. § 794; 34 C.F.R. §§ 104.7, 104.43, 104.44 (**ED Section 504 FAQ**)	Critical for Path 1 & Path 2: OCR can broker Early Complaint Resolution (ECR) to force the 21-credit MS-HHS transfer (Path 1) or issue formal findings of non-compliance supporting federal litigation & Borrower Defense (Path 2).	Transmit Supplemental Evidentiary Notice attaching the Sept 18, 2026 Zamecnik Recording Transcript, the **NU 730** Grade Alteration Screenshot, and a formal request for ECR Mediation to enroll in HH 620 by Nov 2, 2026.

Agency & Jurisdiction	Active Docket / Statutory Authority	Relevance to Path 1 vs. Path 2	Concrete Next-Step Outreach Action
2. U.S. Dept. of Justice — Civil Rights Division (Disability Rights Section)	Active Referral: **DOJ #000000-JVT**ADA Title III & V (42 U.S.C. §§ 12182, 12188[b][2][B], 12203; 28 C.F.R. § 36.504)	Critical for Path 2 Damages: Under 42 U.S.C. § 12188(b)(2)(B), a DOJ pattern-or-practice intervention unlocks emotional distress damages and $115,000+/ $230,000+ civil penalties under Title III.	Submit the Verified Federal Complaint Draft (**Doc 6**) and Sarah Millard Witness Declaration (**Oct 10, 2026**) to DOJ #000000-JVT as proof of systemic pattern-or-practice violations.
3. U.S. Dept. of Education — Federal Student Aid (FSA) Borrower Defense & Enforcement	**20 U.S.C. § 1087e(h)**; **34 C.F.R. §§ 668.14(b)(33), 668.34, 685.401**StudentAid.gov **Borrower Defense Portal** (**PDF Form**)	Critical for Path 2 Debt Discharge & Transcript Release: Places all loans into immediate forbearance, discharges 100% of Herzing debt, and enforces the July 2024 ban on withholding Title IV-funded transcripts (**34 C.F.R. § 668.14[b][33]**).	Submit the online Borrower Defense Application at **studentaid.gov/borrower-defense** and file an FSA Feedback/Enforcement complaint citing 34 C.F.R. § 668.14(b)(33) if Herzing withholds any transcript or Transfer Credit Evaluation.
4. U.S. Dept. of Education — Student Privacy Policy Office (SPPO / FERPA)	**20 U.S.C. § 1232g**; **34 C.F.R. §§ 99.10, 99.20–99.22, 99.32**	Critical for Both Paths: Compels production within 45 days of your withheld Transfer Credit Evaluation, Canvas SQL grade-mutation logs (NU 730), and the **§ 99.32** disclosure log for the 41 May 2025 emails.	File formal SPPO complaint (FERPA.Complaints@ed.gov) attaching Angie Zamecnik's Sept 14, 2026 email admitting the Transfer Credit Evaluation exists while withholding it, plus **EthicsPoint 5**.
5. Wisconsin DSPS (Educational Approval Program) & Wisconsin DATCP	**Wis. Stat. § 440.52** (WI DSPS) & **Wis. Stat. § 100.18** (WI DATCP)	Headquarters Regulatory Hammer: Oversees Herzing's corporate domicile in Milwaukee/ Madison, WI; empowered to order tuition restitution and investigate deceptive trade practices.	Supplement your active WI DSPS complaint (DSPSEAP@wisconsin.gov) and file a parallel consumer fraud complaint with Wisconsin DATCP citing Wis. Stat. § 100.18 and § 146.84.

Agency & Jurisdiction	Active Docket / Statutory Authority	Relevance to Path 1 vs. Path 2	Concrete Next-Step Outreach Action
6. Florida Commission for Independent Education (FL CIE) & Florida Attorney General	**Fla. Stat. §§ 1005.04, 1005.32, 1005.38**; **Fla. Admin. Code r. 6E-1.0032**; **Fla. Stat. §§ 501.204, 501.2077**	Florida Domicile Hammer: Enforces Fair Consumer Practices against independent colleges operating in Florida; establishes per se FDUTPA liability (§ 501.203[3][c]).	File formal Fair Consumer Practices complaint with FL CIE (325 W. Gaines St., Ste. 1414, Tallahassee, FL 32399) and Florida Attorney General Consumer Protection Division (Fla. Stat. § 501.2077 disabled consumer penalty).
7. Higher Learning Commission (HLC) & CCNE	**HLC Criterion 2 (Integrity) & Criterion 3** · **CCNE Standards**	Institutional Accreditation Leverage: HLC Criterion 2 strictly requires institutional integrity, truthful public disclosures, and fair resolution of student grievances.	Supplement your active HLC and CCNE dockets with the **Catalog Policy Evolution Audit** (30-to-7 day cut) and **15-of-15 Ignored Grievances Ledger**.

SECTION 4: MASTER INVENTORY OF VIABLE LEGAL RESOURCES (ALREADY IDENTIFIED VS. NEWLY IDENTIFIED)

4.1 Already Identified Legal, Evidentiary, & Statutory Resources in Your Arsenal

1. Your Own Turnkey 40,200-Word Evidentiary Archive (**HUADA**): **Live HUADA Netlify Portal** & **HUADA+ Public Archive Priority Filings Index** — containing 17 chronological email threads, Exhibits A–J, the August 7, 2025 Emilie Thompson admission (**Exhibit C**), the September 18, 2026 Zamecnik/Laban Teams recording (**Transcript**), the 145-module workload audit (**Exhibit F**), the NU 730 grade alteration screenshot (**Oct 9 Screenshot**), and the independent witness declaration of Sarah Millard (**Oct 10 Witness Declaration**).
2. Active Federal & State Oversight Dockets: OCR Case No. 05-26-2347, DOJ Civil Rights Referral 766398-JVT, ED OIG Title IV Report, IRS Whistleblower Forms 211 & 13909, HLC & CCNE Complaints, WI DSPS & FL BON Complaints, and your October 9, 2026 Federal FOIA Request.
3. Specialized Postsecondary Disability Precedent Repositories: **A Students' Lawyer — Section 504 & ADA Authorities** (**Wynne v. Tufts Authority**), **Southeast ADA Center Legal Database (Liese v. Indian River)**, and **Georgetown Law Higher Education Accommodation Scholarship**.

4.2 Newly Identified High-Impact Legal Representation, Pro Bono, & Litigation Resources

1. **Project on Predatory Student Lending (PPSL)** (**Borrower Defense Hub**): The nation's premier legal organization litigating on behalf of defrauded student borrowers (Sweet v. McMahon, Bauer v. DeVos). Provides direct legal representation, amicus support, and systemic enforcement tools for 34 C.F.R. § 685.401 Borrower Defense claims and 34 C.F.R. § 668.14(b)(33) transcript-withholding bans.
2. **National Student Legal Defense Network (Student Defense)** (**Contact** · **info@defendstudents.org** · **202-734-7495**): Non-profit litigation powerhouse representing students against predatory postsecondary institutions for deceptive marketing, civil rights breaches, and unlawful debt collection.
3. **Community Legal Services of Mid-Florida (CLSMF) — Ocala Office & Volunteer Lawyers Project** (**Justia Profile** · **1610 SE 36th Ave., Ocala, FL 34471** · **352-629-0105**): Right in Ocala (Marion County); operates the Volunteer Lawyers Project connecting qualifying Marion County residents (especially where income was reduced to $0 by institutional misconduct) with pro bono civil litigation and consumer attorneys.
4. **U.S. District Court — Middle District of Florida (Ocala Division) Civil Rights Pro Bono Appointment Panel** (**207 NW Second St., Ocala, FL 34475** · **352-369-4860**): Once you file

your Verified Federal Complaint pro se with Form AO 240 (IFP fee waiver), you can file a short Motion for Appointment of Pro Bono Counsel Pursuant to 28 U.S.C. § 1915(e)(1) and the Middle District of Florida's Federal Bar Association Civil Rights Pro Bono Plan—allowing the federal judge in Ocala to appoint a vetted federal trial lawyer to represent you and collect statutory attorneys' fees from Herzing under 29 U.S.C. § 794a(b), 42 U.S.C. § 1988, and Fla. Stat. § 501.2105!

5. **The Florida Bar Lawyer Referral Service (LRS)** (**1-800-342-8011**) & **State Bar of Wisconsin Lawyer Referral Service (LRIS)** (**1-800-362-9082**): Direct referral panels for private Florida (Sharick contract / FDUTPA / § 817.41) and Wisconsin (Wis. Stat. §§ 100.18, 895.446, 146.84) contingency and fee-shifting trial attorneys.
6. Disability Rights Florida (**1-800-342-0823**) & Disability Rights Wisconsin (**1-800-928-8778**): Federally mandated Protection & Advocacy (P&A) legal agencies with statutory authority to intervene in postsecondary Section 504 and ADA Title III disputes.

ACCESSIBILITY NAVIGATION: [↑ Cover & Disclaimer] · [↑ Table of Contents] · [↑ Case & Ticket Sheet] · [↑ Updated CV & SNHU Audit] · [↑ Angie MP4 & Transcript] · [↑ Gemini Podcast & Transcript] · [↑ Sarah Millard & Emails Addendum] · [Vol I] · [Vol II] · [Vol III] · [Vol IV] · [Vol V] · [Vol VI] · [Vol VII] · [Vol VIII] · [Vol IX] · [Vol X] · [↓ Table of Cases (Chronological)] · [↓ Table of Statutes] · [↓ Legal & Clinical Glossary] · [↓ Reference Registry] · [↓ Complete Index]

END MATTER I · CHRONOLOGICAL & ALPHABETICAL TABLE OF AUTHORITIES (CASE LAW)

CHRONOLOGICAL TABLE OF JUDICIAL DECISIONS & PRECEDENTS WITH LIVE LEGAL LINKS & COMPENDIUM CROSS-REFERENCES

Every Controlling and Persuasive U.S. Supreme Court, Federal Circuit, Federal District, Wisconsin, and Florida Decision Cited Across Volumes I–X, Ordered Chronologically from 1854 to 2025

Year & Date	Case Name, Citation & Direct Legal Database Link	Court / Jurisdiction	Legal Doctrine / Holding & Internal Compendium Links
1854 (Feb 23, 1854)	***Hadley v. Baxendale*, 9 Exch. 341, 156 Eng. Rep. 145 (1854)**	Court of Exchequer (Foundational Common Law)	Consequential contract damages foreseeable at contract formation (lost RN/NP earnings & delayed licensure). Referenced in **[Vol V]**, **[Vol VI]**, **[Vol VII]**.
1932 (Nov 10, 1932)	***Frank v. Marquette University*, 209 Wis. 372, 245 N.W. 125 (1932)**	Wisconsin Supreme Court	University disciplinary/academic dismissal may not be arbitrary, capricious, or in bad faith violation of published rules. Referenced in **[Vol V]**, **[Vol VI]**.
1966 (Mar 22, 1966)	***University of Miami v. Militana*, 184 So. 2d 701 (Fla. 3d DCA 1966)**	Florida Third District Court of Appeal	Implied contract between private university and student governed by terms set forth in university catalogs and bulletins. Referenced in **[Vol V]**, **[Vol VI]**.
1977 (Dec 12, 1977)	***Steinberg v. Chicago Medical School*, 69 Ill. 2d 320, 371 N.E.2d 634 (1977)**	Illinois Supreme Court (Persuasive Contract Authority)	Brochure/catalog descriptions constitute an enforceable invitation to contract; arbitrary deviation from published evaluation criteria breaches contract. Referenced in **[Vol V]**.
1978 (Mar 1, 1978)	***Board of Curators of the University of Missouri v. Horowitz*, 435 U.S. 78 (1978)**	U.S. Supreme Court	Distinguishes pure academic judgment from arbitrary/bad-faith refusal to follow published institutional rules and statutory mandates. Referenced in **[Vol V]**, **[Vol X]**.
1979 (June 11, 1979)	***Southeastern Community College v. Davis*, 442 U.S. 397 (1979)**	U.S. Supreme Court	Foundational Section 504 standard: an "otherwise qualified" student who meets clinical/academic standards with reasonable accommodations cannot be excluded. Referenced in **[Vol V]**, **[Vol VI]**.
1985 (Jan 9, 1985)	***Alexander v. Choate*, 469 U.S. 287 (1985)**	U.S. Supreme Court	Section 504 requires "meaningful access" to federally funded programs through reasonable modifications. Referenced in **[Vol V]**, **[Vol VI]**.
1985 (Dec 18, 1985)	***Regents of the University of Michigan v. Ewing*, 474 U.S. 214 (1985)**	U.S. Supreme Court	Judicial intervention warranted where institutional action is a substantial departure from accepted academic norms demonstrating lack of professional judgment. Referenced in **[Vol V]**.
1991 / 1992 (Apr 17, 1991)	***Wynne v. Tufts University School of Medicine*, 932 F.2d 19 (1st Cir. 1991) & 976 F.2d 791 (1st Cir. 1992)**	U.S. Court of Appeals for the First Circuit (en banc)	Academic deference under Section 504 applies ONLY if the institution proves that relevant officials rationally considered alternative means, their feasibility, and cost prior to adverse action. Referenced in **[Vol V]**, **[Vol VI]**, **[Vol VII]**.
1997 (Aug 15, 1997)	***Guckenberger v. Boston University*, 974 F. Supp. 106 (D. Mass. 1997)**	U.S. District Court, District of Massachusetts	Landmark ADA Title III / Section 504 ruling awarding damages and injunctive relief against a university for arbitrary, bad-faith administration of learning disability accommodations (ADHD/ dyslexia). Referenced in **[Vol V]**, **[Vol VI]**, **[Vol VII]**.
1998 (June 22, 1998)	***Gebser v. Lago Vista Independent School District*, 524 U.S. 274 (1998)**	U.S. Supreme Court	Establishes "actual notice" to an appropriate official with authority to institute corrective measures plus "deliberate indifference" standard. Referenced in **[Vol V]**, **[Vol VI]**.
1998 (Sept 14, 1998)	***Bartlett v. New York State Board of Law Examiners*, 156 F.3d 321 (2d Cir. 1998), *vacated on other grounds*, 527 U.S. 1031 (1999)**	U.S. Court of Appeals for the Second Circuit	High-stakes testing entities violate the ADA and Section 504 when they refuse extended time accommodations to qualified candidates with cognitive processing disabilities. Referenced in **[Vol V]**.
2000 (July 19, 2000)	***Sharick v. Southeastern University of the Health Sciences, Inc.*, 780 So. 2d 136 (Fla. 3d DCA 2000)**	Florida Third District Court of Appeal	**Controlling Florida Remedies Precedent:** When an arbitrary bad-faith dismissal deprives a graduate health student of a degree, damages are NOT limited to tuition refund—the student may recover lost future professional earning capacity caused by the delay/denial of the degree. Referenced in **[Vol V]**, **[Vol VI]**, **[Vol VII]**.
2001 (May 29, 2001)	***PGA Tour, Inc. v. Martin*, 532 U.S. 661 (2001)**	U.S. Supreme Court	ADA Title III requires individualized inquiry into whether a requested modification fundamentally alters the nature of the program; blanket refusals are unlawful. Referenced in **[Vol V]**.
2002 (June 17, 2002)	***Barnes v. Gorman*, 536 U.S. 181 (2002)**	U.S. Supreme Court	Defines Spending Clause contract remedies under Section 504 and Title VI: compensatory contract-style expectation and consequential damages are available, while punitive damages are barred under Spending Clause statutes. Referenced in **[Vol V]**, **[Vol VI]**.
2002 (June 20, 2002)	***Gonzaga University v. Doe*, 536 U.S. 273 (2002)**	U.S. Supreme Court	Clarifies that while FERPA (20 U.S.C. § 1232g) lacks a standalone § 1983 private right of action, FERPA standards remain enforceable via state contract, negligence per se, invasion of privacy, and UDAP/ FDUTPA claims. Referenced in **[Vol V]**, **[Vol VI]**.

Year & Date	Case Name, Citation & Direct Legal Database Link	Court / Jurisdiction	Legal Doctrine / Holding & Internal Compendium Links
2003 (Oct 22, 2003)	***Zubulake v. UBS Warburg LLC*, 220 F.R.D. 212 (S.D.N.Y. 2003)**	U.S. District Court, Southern District of New York	Foundational ESI preservation standard: once a party reasonably anticipates litigation, it must suspend routine auto-deletion (such as 29-day SharePoint timers) and institute a litigation hold. Referenced in **[Vol VIII]**, **[Vol IX]**.
2004 / 2007 (July 12, 2007)	***Tietsworth v. Harley-Davidson, Inc.*, 2004 WI 32, 270 Wis. 2d 146, 677 N.W.2d 233** & ***K&S Tool & Die Corp. v. Perfection Machinery Sales, Inc.*, 2007 WI 70, 301 Wis. 2d 109, 732 N.W.2d 792**	Wisconsin Supreme Court	Under Wis. Stat. § 100.18 (DTPA), a plaintiff need only show an untrue, deceptive, or misleading representation made to "the public" (including prospective students) that caused pecuniary loss, entitling the plaintiff to actual damages and mandatory attorney fees. Referenced in **[Vol V]**, **[Vol VI]**.
2005 (Mar 29, 2005)	***Jackson v. Birmingham Board of Education*, 544 U.S. 167 (2005)**	U.S. Supreme Court	Retaliation against a person because they complained of discrimination is a form of intentional discrimination actionable under Spending Clause civil rights statutes. Referenced in **[Vol V]**, **[Vol VI]**.
2007 (Nov 20, 2007)	***Singh v. George Washington University School of Medicine & Health Sciences*, 508 F.3d 1097 (D.C. Cir. 2007)**	U.S. Court of Appeals for the D.C. Circuit	Addresses ADA accommodations in medical/clinical education and rejects post-hoc institutional rationalizations where accommodations were not timely evaluated prior to dismissal. Referenced in **[Vol V]**.
2011 (Jan 4, 2011)	***Enyart v. National Conference of Bar Examiners, Inc.*, 630 F.3d 1153 (9th Cir. 2011)**	U.S. Court of Appeals for the Ninth Circuit	Under 42 U.S.C. § 12189 and 28 C.F.R. § 36.309, testing and licensing accommodations must be administered so as to "best ensure" that examination results reflect aptitude rather than impaired sensory/cognitive skills. Referenced in **[Vol V]**, **[Vol VI]**.
2012 (Oct 19, 2012)	***Liese v. Indian River County Hospital District*, 701 F.3d 334 (11th Cir. 2012)**	U.S. Court of Appeals for the Eleventh Circuit	**Controlling 11th Circuit Standard:** Intentional discrimination under Section 504 is established by showing "deliberate indifference" by an "official" who had knowledge of a violation and authority to take corrective measures (such as AVP Laban and Director Zamecnik). Referenced in **[Vol V]**, **[Vol VI]**, **[Vol VII]**.
2013 (July 2, 2013)	***Argenyi v. Creighton University*, 703 F.3d 441 (8th Cir. 2013)**	U.S. Court of Appeals for the Eighth Circuit	Under Section 504 and ADA Title III, a health-sciences university must provide auxiliary aids and modifications that afford a disabled student an "equal opportunity to gain the same benefit" as nondisabled peers. Referenced in **[Vol V]**, **[Vol VI]**.
2016 (June 16, 2016)	***Universal Health Services, Inc. v. United States ex rel. Escobar*, 579 U.S. 176 (2016)**	U.S. Supreme Court	Validates the "implied false certification" theory under the False Claims Act (31 U.S.C. § 3729) where an institution draws down federal funds while knowingly violating material statutory/regulatory conditions (such as Title IV SAP and civil rights rules). Referenced in **[Vol V]**, **[Vol VI]**, **[Vol VII]**.
2018 (Feb 7, 2018)	***ML Healthcare Services, LLC v. Publix Super Markets, Inc.*, 881 F.3d 1293 (11th Cir. 2018)**	U.S. Court of Appeals for the Eleventh Circuit	Governs Fed. R. Civ. P. 37(e) spoliation sanctions and mandatory adverse-inference jury instructions when a defendant fails to preserve electronically stored video/LMS audit logs after receiving written preservation notice. Referenced in **[Vol VIII]**, **[Vol IX]**.
2020 (Sept 16, 2020)	***Salerno v. Florida Southern College*, 488 F. Supp. 3d 1211 (M.D. Fla. 2020)**	U.S. District Court, Middle District of Florida	Middle District of Florida precedent upholding student breach-of-contract and unjust enrichment claims where a private university fails to deliver specific contracted educational services promised in syllabi and catalogs. Referenced in **[Vol V]**, **[Vol VI]**.
2022 (Apr 28, 2022)	***Cummings v. Premier Rehab Keller, P.L.L.C.*, 596 U.S. 212 (2022)**	U.S. Supreme Court	Holds that standalone emotional distress damages are not recoverable under Spending Clause statutes (Section 504 / Title VI), making it essential to plead pecuniary/contractual expectation damages, consequential lost earnings, state tort IIED/negligence, Wis. Stat. § 100.18, and FDUTPA claims alongside Section 504. Referenced in **[Vol V]**, **[Vol VI]**, **[Vol VII]**.
2024 (June 28, 2024)	***Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024)**	U.S. Supreme Court	Overrules *Chevron* deference; federal courts exercise independent statutory judgment in enforcing the plain text of Section 504 (29 U.S.C. § 794) and the ADA (42 U.S.C. §§ 12182, 12189) regardless of agency delay or administrative dismissal. Referenced in **[Vol V]**, **[Vol X]**.
2025 (June 12, 2025)	***A.J.T. v. Osseo Area Schools, Independent School District No. 279*, 605 U.S. ___ (No. 24-249, June 12, 2025)**	U.S. Supreme Court (9–0 Unanimous Decision)	**Landmark 2025 Supreme Court Precedent:** Rejects heightened "bad faith or gross misjudgment" barriers in educational Section 504 / ADA claims; confirms that disabled students seeking relief in educational settings are governed by the standard deliberate indifference and reasonable modification frameworks applicable across all other contexts. Referenced in **[Vol V]**, **[Vol VI]**, **[Vol VII]**, **[Vol X]**.

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END MATTER II · TABLE OF STATUTES, REGULATIONS & RULES

TABLE OF FEDERAL STATUTES, CODE OF FEDERAL REGULATIONS, WISCONSIN STATUTES, FLORIDA STATUTES & ACCREDITATION STANDARDS

Organized by Statutory Hierarchy with Direct Hyperlinks to Cornell LII, eCFR, Wisconsin Legislature, and Florida Legislature

Citation & Direct Statutory Link	Statutory / Regulatory Title	Operative Legal Standard & Compendium Application	Internal Section Links
29 U.S.C. § 794 & **29 U.S.C. § 794a**	Section 504 & Section 505 of the Rehabilitation Act of 1973	Prohibits disability discrimination by any postsecondary educational institution receiving federal Title IV financial assistance; authorizes private right of action, compensatory contract-style damages, equitable reinstatement, and attorney's fees.	[Registry] · [Vol V] · [Vol VII] · [Vol VII]
42 U.S.C. § 12182, **§ 12188** & **§ 12189**	Americans with Disabilities Act (ADA) Title III — Public Accommodations & Examinations	Mandates reasonable modifications of policies/practices in private universities (§ 12182(b)(2)(A)(ii)) and requires high-stakes examinations/courses related to professional licensing to be offered in an accessible manner (§ 12189).	[Registry] · [Vol V] · [Vol VI] · [Vol VIII]
42 U.S.C. § 12203(a)–(b)	ADA Title V — Prohibition Against Retaliation, Coercion, Intimidation, or Interference	Strictly prohibits retaliation or coercion against any individual who exercises rights under the ADA or files ethics/civil rights complaints (`EP-2025-1210` through `607735433401`).	[Vol V] · [Vol VI] · [Vol VII]
42 U.S.C. § 1988 & **42 U.S.C. § 12205**	Civil Rights Attorney's Fees Awards Statutes	Authorizes fee-shifting recovery of reasonable attorney's fees, expert witness fees, and litigation costs for prevailing plaintiffs under Section 504 and the ADA.	[Vol V] · [Vol VI] · [Vol VII]
20 U.S.C. § 1232g & **34 C.F.R. Part 99 (§§ 99.10, 99.20–.22, 99.30, 99.32)**	Family Educational Rights and Privacy Act (FERPA) & Implementing Regulations	Mandates production of all education records (including Transfer Credit Evaluations and LMS grade audit logs) within **45 days** (§ 99.10), right to formal hearing to amend inaccurate grades/records (§§ 99.20–.22), prohibition on unauthorized medical disclosure without consent (§ 99.30), and mandatory accounting of the 41 disclosures (§ 99.32).	[Registry] · [Addendum A] · [Vol V] · [Vol VI] · [Vol VIII]
34 C.F.R. § 104.44(a)–(d) & **34 C.F.R. § 100.7(e)**	U.S. Dept. of Education Postsecondary Academic Adjustments, Exam Modifications & Anti-Retaliation Rules	Requires modifications to academic requirements (extended time, extensions), requires course examinations to evaluate achievement rather than impaired sensory/manual/speaking/processing skills (§ 104.44(c)), mandates auxiliary aids (§ 104.44(d)), and bars retaliatory intimidation (§ 100.7(e)).	[Addendum C] · [Vol V] · [Vol VI]
28 C.F.R. § 36.309 & **28 C.F.R. § 36.302**	DOJ ADA Title III Regulations for Examinations, Courses & Reasonable Modifications	Mandates that any private entity offering examinations or courses related to applications, licensing, certification, or credentialing must select and administer exams so as to "best ensure" results reflect aptitude rather than disability.	[Addendum C] · [Vol V] · [Vol VI]
34 C.F.R. § 668.34, **§ 668.14** & **Subpart F (§§ 668.71–.75)**	Title IV Higher Education Act Program Participation Agreement (PPA), Satisfactory Academic Progress (SAP) & Misrepresentation Rules	Requires consistent application of SAP policies including treatment of Incompletes ("I") and appeals (§ 668.34); prohibits substantial misrepresentation regarding program transferability, clinical hours, and student support services (Subpart F).	[Registry] · [Vol V] · [Vol VI] · [Vol IX]
34 C.F.R. § 685.402 & **34 C.F.R. § 685.206**	Federal Direct Loan Borrower Defense to Repayment Regulations	Authorizes 100% discharge of Direct Loans ($17,225 + accrued interest) and reimbursement of payments where the school engaged in substantial misrepresentation, breach of contract, or aggressive and deceptive recruitment/retention conduct.	[Registry] · [Vol V] · [Vol IX] · [Vol X]
31 U.S.C. §§ 3729–3733	Federal False Claims Act (FCA) & *Qui Tam* Relator Provisions	Imposes treble damages and civil penalties ($13,946 to $27,894 per false claim) on institutions that knowingly submit or cause false Title IV certifications while violating material PPA conditions; § 3730(h) protects whistleblowers.	[Vol V] · [Vol VI] · [Vol VII]
28 U.S.C. §§ 1331, 1332, 1367, 1391, 1651, 1746, 1915, 2201–2202	Federal Judicial Code — Jurisdiction, Venue, All Writs Act, Unsworn Declarations under Penalty of Perjury, IFP & Declaratory Judgment	Establishes federal question (§ 1331), diversity (§ 1332), and supplemental (§ 1367) jurisdiction in the M.D. Fla. Ocala Division (§ 1391); governs sworn declarations (§ 1746) and *in forma pauperis* / pro bono counsel appointment (§ 1915).	[Vol VI] · [Vol VIII] · [Vol IX]
Fed. R. Civ. P. 26, 27, 34, 37(e) & 65 & **M.D. Fla. Local Rules 1.08, 3.01 & 6.01–6.02**	Federal Rules of Civil Procedure & Middle District of Florida Local Rules	Governs pre-suit perpetuation of testimony/evidence (Rule 27), ESI production including native Canvas JSON/PostgreSQL audit logs and SharePoint `.mp4` streams (Rules 26 & 34), spoliation sanctions (Rule 37(e)), and emergency injunctive relief (Rule 65).	[Vol VI] · [Vol VIII] · [Vol IX]
Wis. Stat. § 100.18	Wisconsin Deceptive Trade Practices Act (DTPA)	Prohibits untrue, deceptive, or misleading representations made to the public in connection with educational services; mandates recovery of pecuniary loss, double damages where applicable, and reasonable attorney's fees (§ 100.18(11)(b)2).	[Vol V] · [Vol VI] · [Vol VII]

Citation & Direct Statutory Link	Statutory / Regulatory Title	Operative Legal Standard & Compendium Application	Internal Section Links
Wis. Stat. § 106.56, **§ 995.50** & **§ 895.043**	Wisconsin Postsecondary Disability Non-Discrimination, Right of Privacy & Punitive Damages Statutes	Prohibits discrimination against disabled students in Wisconsin-headquartered postsecondary programs (§ 106.56); provides civil cause of action for unauthorized public disclosure of private medical facts (§ 995.50(2)(c)); authorizes punitive damages up to $200,000 or 2x compensatory damages for intentional disregard of rights (§ 895.043).	**[Vol V]** · **[Vol VI]**
Fla. Stat. §§ 501.201–501.213 (esp. **§ 501.204, § 501.2105, § 501.211**)	Florida Deceptive and Unfair Trade Practices Act (FDUTPA)	Prohibits unfair or deceptive acts or practices in the conduct of any trade or commerce in Florida; authorizes declaratory relief, injunctive relief, actual damages, and mandatory prevailing-party attorney's fees (§ 501.2105).	**[Vol V]** · **[Vol VI]** · **[Vol VII]**
Fla. Stat. § 817.41 & **Fla. Stat. §§ 768.72–768.73**	Florida Misleading Advertising Statute & Punitive Damages Framework	Authorizes actual and punitive damages plus attorney's fees for misleading institutional representations (§ 817.41); authorizes punitive damages up to 3x compensatory damages or $500,000 (or 4x / $2,000,000 for financial-gain misconduct) upon proffer of intentional misconduct or gross negligence (§§ 768.72–.73).	**[Vol V]** · **[Vol VI]** · **[Vol VII]**
Fla. Stat. §§ 464.008, 464.012, 464.0123 & **Fla. Admin. Code R. 64B9-4.020**	Florida Nurse Practice Act — RN Licensure by Exam, APRN Certification & Autonomous Practice	Governs NCLEX-RN licensure (§ 464.008), WHNP-BC APRN certification (§ 464.012), and Autonomous APRN registration after 3,000 supervised clinical hours (§ 464.0123, enacted via HB 607)—forming the statutory backbone of Chavon Wright's career trajectory and *Sharick* lost-earning calculations.	**[Updated CV]** · **[Vol IV]** · **[Vol V]**

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END MATTER III · COMPREHENSIVE LEGAL, REGULATORY, CLINICAL & TECHNICAL GLOSSARY

GLOSSARY OF DEFINED LEGAL DOCTRINES, STATUTORY TERMS, CLINICAL CREDENTIALS & LMS FORENSIC TERMINOLOGY

Alphabetical Definitions with Cross-References to Controlling Statutes and Compendium Sections

Term / Acronym	Domain	Precise Legal, Clinical, or Technical Definition & Compendium Context
ADA Title III (42 U.S.C. § 12182 / § 12189)	Federal Civil Rights Law	Subchapter III of the Americans with Disabilities Act prohibiting disability discrimination by private places of public accommodation (including private universities like Herzing) and mandating accessible administration of professional licensing/credentialing courses and exams. See **[Vol V]**.
Adverse-Inference Instruction (Fed. R. Civ. P. 37(e)(2))	Federal Civil Procedure	A judicial sanction instructing the jury or factfinder to presume that destroyed or withheld electronically stored information (such as expired SharePoint `.mp4` recordings or unproduced Canvas grade-change audit logs) was unfavorable to the spoliating party. See **[Vol VIII]**, **[Vol IX]**.
Autonomous APRN (Fla. Stat. § 464.0123)	Florida Healthcare Law	An Advanced Practice Registered Nurse registered with the Florida Board of Nursing to practice primary care or women's health/family medicine independently without a supervisory physician protocol after completing 3,000 clinical hours and graduate pharmacology/differential diagnosis coursework. See **[Updated CV]**, **[Vol IV]**.
Borrower Defense to Repayment (34 C.F.R. § 685.402)	Federal Higher Education Law	A federal statutory and regulatory remedy discharging 100% of Direct Student Loans and refunding prior payments when a Title IV institution engages in substantial misrepresentation, breach of contract, or aggressive/deceptive conduct. See **[Vol IX]**, **[Vol X]**.
BSHHS (Bachelor of Science in Health and Human Services)	Academic Program	Herzing University's undergraduate health and human services degree pathway into which 31.00 of Chavon Wright's completed credits were evaluated for transfer (confirmed Oct 8–13, 2026 by Kaitlyn Alicea), and which incorporates graduate-aligned interdisciplinary health coursework (`HH 620` / `HH 630`). See **[Vol I]**, **[Vol III]**.
Canvas LMS Audit Logs (`grade_change_events`)	Forensic ESI	Immutable server-side relational database tables and API endpoints within Instructure Canvas LMS recording every grade modification, quiz timer override, accommodation extension, IP address, and administrative actor ID. Requested under Canvas Case #`00000039`. See **[Registry]**, **[Vol VIII]**.
CCNE (Commission on Collegiate Nursing Education)	Accreditation	The national programmatic accrediting agency for baccalaureate and graduate nursing programs recognized by the U.S. Secretary of Education. See **[Vol II]**, **[Vol III]**.
Deliberate Indifference (*Liese* / *Gebser* Standard)	Federal Civil Rights Law	The controlling Eleventh Circuit standard for proving intentional discrimination and recovering compensatory damages under Section 504: established when an institutional official with authority to take corrective action has actual knowledge of a substantial risk of a civil rights violation and fails to adequately respond. See **[Vol V]**, **[Vol VI]**.
Direct Primary Care (DPC) / Hybrid 501(c)(3) Model	Healthcare Practice Economics	A healthcare delivery model pairing a flat-fee membership clinical practice (LLC/PLLC) with a tax-exempt 501(c)(3) nonprofit survivor-services and forensic arm eligible for VOCA/OVW grant funding. See **[Updated CV]**.
EthicsPoint (NAVEX Global)	Institutional Governance	The third-party compliance and whistleblower hotline platform utilized by Herzing University, across which Chavon Wright submitted 7 formal filings (`EP-2025-1210` through `607735433401`) and prepared 8 additional category packets withheld due to documented portal futility. See **[Registry]**.
Expectation & Consequential Contract Damages	Contract Remedies	Pecuniary damages placing the injured student in the position she would have occupied had the university performed its published catalog/syllabus obligations—including tuition/debt restitution ($21,418) and foreseeable lost professional earnings under *Sharick v. Southeastern University*. See **[Vol V]**.
FDUTPA (Fla. Stat. §§ 501.201–.213)	Florida Consumer Law	The Florida Deceptive and Unfair Trade Practices Act prohibiting unfair or deceptive trade practices and providing actual damages, declaratory/injunctive relief, and mandatory attorney's fees. See **[Vol V]**, **[Vol VI]**.
FERPA (20 U.S.C. § 1232g; 34 C.F.R. Part 99)	Federal Education Privacy Law	Federal statute granting students the mandatory right to inspect and obtain copies of all education records within 45 days (§ 99.10), challenge inaccurate records (§ 99.20), and prevent unauthorized disclosure of confidential disability records (§ 99.30). See **[Vol V]**, **[Vol VIII]**.
HLC (Higher Learning Commission)	Institutional Accreditation	The regional institutional accreditor for Herzing University; Criterion 2 requires ethical and responsible institutional conduct, and Criterion 3 governs teaching and learning quality. Complaint confirmed Oct 14, 2026 (`1a135f2b9fcb6963`). See **[Addendum C]**.
HUADA.082426.V3	Disability Accommodation Plan	Chavon Wright's approved Herzing University ADA Accommodation Plan (Version 3, Aug 24, 2026), mandating 200% extended testing time, distraction-reduced environment permitting verbal processing, 48–72 hour assignment extensions, and video/transcription access. See **[Registry]**.
Mandatory Incomplete ("I") Policy	Catalog & SAP Rule	Herzing University's published catalog rule requiring that an Incomplete ("I") grade remain on a student's transcript while a formal Grade Appeal is pending, thereby precluding SAP dismissal during appeal adjudication. See **[Addendum A]**, **[Vol V]**.

Term / Acronym	Domain	Precise Legal, Clinical, or Technical Definition & Compendium Context
MSN-DE (Direct Entry Master of Science in Nursing)	Academic Program	Accelerated graduate pre-licensure nursing pathway for non-nurse bachelor's degree holders, in which Chavon Wright earned a 4.00 A&P science GPA and completed 135+ hospital clinical hours before administrative obstruction. See **[Vol II]**, **[Vol III]**.
NCHEC / CHES (Certified Health Education Specialist)	Health Education Credential	National Commission for Health Education Credentialing competency framework aligned with `HH 620`, `HH 630`, and UF Online's B.S. in Health Education & Behavior. See **[Vol I]**, **[Vol IV]**.
Pro Se Litigant / *In Forma Pauperis* (28 U.S.C. § 1915)	Federal Litigation Procedure	A party representing herself before a court without retained counsel (entitled to liberal construction of pleadings under *Erickson v. Pardus*, 551 U.S. 89 (2007)), and the statutory mechanism waiving $405 federal filing fees and authorizing court-requested pro bono counsel. See **[Vol VIII]**, **[Vol IX]**.
SAEF (Sexual Assault Examination & Forensic Framework)	Clinical & Medicolegal Model	Chavon Wright's integrated clinical, forensic nursing (SANE-A/SANE-P via ANCC), survivor advocacy, and legislative statute-of-limitations tolling practice framework. See **[Updated CV]**, **[Vol IV]**.
SAP (Satisfactory Academic Progress — 34 C.F.R. § 668.34)	Title IV Financial Aid Regulation	Federal regulation governing qualitative (GPA) and quantitative (pace) standards for Title IV eligibility, requiring institutions to follow published appeal and Incomplete grade rules consistently. See **[Vol V]**.
SNHU Coursework Clarification	Academic Credential Audit	Explicit verification across all `CWright26` records that Chavon Wright completed 36 graduate credits (12 courses) in the M.S. in Forensic Psychology program at Southern New Hampshire University (2022–2024) as 36.00 credits of graduate coursework in Forensic Psychology. See **[Updated CV]**.
Transfer Credit Evaluation (TCE)	Registrar Record	Official institutional audit determining transferable credits across degree programs; Herzing completed Chavon Wright's 31-credit TCE by Sept 14, 2026 (confirmed by Angie Zamecnik and Oct 8–13, 2026 by Kaitlyn Alicea) but withheld delivery of the document in violation of FERPA. See **[Addendum A]**, **[Addendum C]**.
WHNP-BC (Women's Health Care Nurse Practitioner — Board Certified)	APRN National Certification	National board certification administered by the National Certification Corporation (NCC) for graduates of accredited Women's Health Nurse Practitioner MSN/DNP programs. See **[Updated CV]**, **[Vol IV]**.
Wis. Stat. § 100.18 (Wisconsin DTPA)	Wisconsin Consumer Statute	Wisconsin's statutory prohibition on untrue, deceptive, or misleading representations to the public, applicable to Milwaukee-headquartered Herzing University and providing pecuniary damages and mandatory attorney's fees. See **[Vol V]**, **[Vol VI]**.

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COMPREHENSIVE REFERENCE PAGE — LEGAL, STATUTORY, ACCREDITATION, SCHOLARLY & EVIDENTIARY SOURCES

Unified Bibliography of All Primary Evidentiary Exhibits, Federal & State Authorities, Accreditation Standards, and Scholarly Literature Across Volumes I–X and Addendums A–C

1. Primary Evidentiary Dockets, Recordings, Transcripts & Workspace Repositories

1. Wright, C. J. (2026). *HUADA+ Digital Evidence & Accessibility Repository*. Available at: **https://huadaplus.netlify.app/**
2. Wright, C. J. (2026). *CWright26. 10.19. Herzing. Case and Ticket Registry (Standalone Live Standalone Registry PDF & HUADA+ Archive)*. HUADA+ Archive Exhibit. Available at: **https://wrighthuada.netlify.app/**
3. Wright, C. J. (2026). *MSNDE to HHS — Google Gemini Notebook (NotebookLM Evidentiary Synthesis & Audio Repository)*. Available at: **https://huadaplus.netlify.app/media.html**
4. Wright, C. J. (2026, Sept. 18). *CWright26. 9.18. HUADA. Zamecnik Meeting: Auditor Notes & Copy-Paste of Inaccessible SharePoint Stream Transcript* (39 min 11 sec teleconference with Director Angie Zamecnik). HUADA+ Transcript Exhibit. Available at: **https://huadaplus.netlify.app/appeals-grievances.html**
5. Wright, C. J. (2026, Sept. 27). *CWright26. 9.27. HUADA. Angie Zamecnik Evidentiary Packet & EthicsPoint Filing* (11 pp.). HUADA+ Archive Exhibit. Available at: **https://huadaplus.netlify.app/appeals-grievances.html**
6. Wright, C. J. (2026, Sept. 20 & Oct. 9). *Forensic Screenshots of Herzing University Microsoft SharePoint Stream Download Lockout ("Expires in 29 days, no permission to download") and Transcript Interface*. HUADA+ Public Archive IDs **1S2oZcJQ0PlTT6rA4jnYHMKEObQGw_Yz3** and **1sGGPbEUSW8vBLEzCwhuE-M2TKIkcCIey**.
7. Google Gemini Notebook Audio Synthesis (2026). *Syllabus Sues University For Student* (Syllabus_Sues_University_For_Student.m4a). HUADA+ Public Archive ID **1kRZPwcM7C2mjp8RdhQw8nLCqq8uAkZv2** (Companion tracks: **Inside_Herzing_University_s_Rigged_Grade_Appeal.m4a**, **Nursing_student_exposes_university_with_browser_code.m4a**, **Nursing_student_audits_her_university_code.m4a**, and **Acing_Exams_Software_Says_You_Failed.m4a**).
8. Millard, S. E. (2026, Oct. 10 & Oct. 14). *Witness Declaration and Request for Institutional Review and Corrective Action: Re: Herzing University's Violations against Chavon J. Wright (OCR Case No. 05262347)* (33 pp., **Drive ID 144eMb5vx_ddC_qu8Kf_zdRO2c7lrPjNW**) and Forwarded October 13, 2026 OCR Denver Email (**Gmail Thread 1a12864b80cb33cb**).
9. Wright, C. J. (2026, Sept. 16). *Consolidated EthicsPoint Whistleblower Record (Report Key 607735433401 & Filings EP-2025-1210, EP-2025-1219, EP-2026-0324, EP-2026-0728, EP-2026-0828, Case 00542344)*. HUADA+ Public Archive ID **19jMwmUtFASxB04BPiBf4hGQipmAGSArI**.
10. Wright, C. J. (2026, Sept. 28 – Oct. 5). *Prepared EthicsPoint Category Evidentiary Packets 1–5 & Filings 1–2 (Withheld Due to Portal Futility)*: **Packet 1 (Communication)**; **Packet 2 (EEOC/ADA Discrimination, 16 pp.)**; **Packet 3 (Financial & Benefits Abuse)**; **Packet 4 (Safety of Physical Environment)**; **Packet 5 (Security & Misuse of Data, 8 pp.)**; **9.28 Filing 1 (FERPA Violations)**; **9.28 Filing 2 (Due Process & Sham Appeals)**.
11. Wright, C. J. (2026). *CWright26 Comprehensive Academic Record (with Education Options, 15 pp.) & Updated Curriculum Vitae*. HUADA+ Public Archive IDs **1Uuw4WBCRRKAgH_UnTPevX7BSQCAiLmtt** and **12OrpPIdNYVpT_jy-2r0RPi4lw4eZ5105**.
12. Wright, C. J. (2026, Sept. 28). *Discovery & ServiceNow/Canvas Ticket Audit Spreadsheets* (**Sheet 1OZ3X990lrbDAS3WkCTCroWGMglgOWwsxWnwpM15otdY** and **41-Email ADA Disclosure Audit 1eLQ5BspgxJox9iF-dJFopqYJ3lNAUBFRk8SE8zojfVg**).
13. Wright, C. J. (2026, Oct. 18). *Ten-Volume Google Docs Compendium Suite*: **Vol. V (Legal & Statutory Damages Compendium)** · **Vol. VI (Verified Federal Complaint & Demand)** · **Vol. VII (Attorney Outreach & Case Valuation Package)** · **Vol. VIII (Pro Se Evidence Preservation Motion)** · **Vol. IX (Supplemental Legal Appendices & Orders)** · **Vol. X (Next Steps & Two Viable Paths)**.

2. Federal & State Judicial, Statutory, Regulatory & Accreditation Authorities

1. U.S. Supreme Court (2025). *A.J.T. v. Osseo Area Schools, Independent School District No. 279*, 605 U.S. ___ (No. 24-249, June 12, 2025). **https://www.supremecourt.gov/opinions/24pdf/24-249_a86c.pdf**
2. U.S. Supreme Court (2024). *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024). **https://supreme.justia.com/cases/federal/us/603/22-451/**
3. U.S. Supreme Court (2022). *Cummings v. Premier Rehab Keller, P.L.L.C.*, 596 U.S. 212 (2022). **https://supreme.justia.com/cases/federal/us/596/212/**
4. U.S. Supreme Court (2016). *Universal Health Services, Inc. v. United States ex rel. Escobar*, 579 U.S. 176 (2016). **https://supreme.justia.com/cases/federal/us/579/176/**
5. U.S. Supreme Court (2002). *Barnes v. Gorman*, 536 U.S. 181 (2002). **https://supreme.justia.com/cases/federal/us/536/181/**
6. U.S. Court of Appeals for the Eleventh Circuit (2012). *Liese v. Indian River County Hospital District*, 701 F.3d 334 (11th Cir. 2012). **https://www.courtlistener.com/opinion/810545/liese-v-indian-river-county-hospital-district/**
7. U.S. Court of Appeals for the First Circuit (1991/1992). *Wynne v. Tufts University School of Medicine*, 932 F.2d 19 (1st Cir. 1991) (en banc) & 976 F.2d 791 (1st Cir. 1992). **https://www.courtlistener.com/opinion/690328/wynne-v-tufts-university-school-of-medicine/**

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9. Florida Third District Court of Appeal (2000). *Sharick v. Southeastern University of the Health Sciences, Inc.*, 780 So. 2d 136 (Fla. 3d DCA 2000). **https://scholar.google.com/scholar_case?case=16729368196081260454**
10. U.S. District Court for the Middle District of Florida (2026). *Local Rules of the United States District Court for the Middle District of Florida & Ocala Division Guide for Proceeding Without a Lawyer*. **https://www.flmd.uscourts.gov/litigants-without-lawyers**
11. American Association of Colleges of Nursing (AACN) & Commission on Collegiate Nursing Education (CCNE) (2021/2024). *The Essentials: Core Competencies for Professional Nursing Education & CCNE Standards for Accreditation of Baccalaureate and Graduate Nursing Programs*. **https://www.aacnnursing.org/ccne-accreditation**
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- **ADA Title V Retaliation (42 U.S.C. § 12203): [Vol V], [Vol VI], [Statutes]**
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- ***A.J.T. v. Osseo Area Schools* (605 U.S. ___, 2025): [Vol V], [Vol VI], [Vol VII], [Cases]**
- **Alicea, Kaitlyn (`kalicea@herzing.edu` — Oct 8–13, 2026 TCE Emails): [Registry], [Addendum C]**
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- **American Nurses Credentialing Center (ANCC — SANE-A / SANE-P Transition): [Updated CV], [Vol IV]**
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- **Borrower Defense to Repayment (34 C.F.R. § 685.402 / MOHELA): [Registry], [Vol V], [Vol IX], [Vol X]**
- **Bounced Compliance & Legal Emails (9 Postmaster Failures): [Registry], [Addendum C], [Vol VIII]**
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- **Charter Oak State College (Second-Degree Matrix): [Updated CV], [Vol X]**
- ***Cummings v. Premier Rehab Keller* (596 U.S. 212, 2022): [Vol V], [Vol VI], [Cases]**
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- **EthicsPoint Submitted Filings (`EP-2025-1210` to `607735433401`): [Registry], [Addendum A], [Vol V], [Vol VI]**
- **EthicsPoint Unsubmitted Category Packets 1–5 & Filings 1–2 (Portal Futility): [Registry], [Addendum C], [References]**
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- **FDUTPA (Fla. Stat. §§ 501.201–501.213): [Vol V], [Vol VI], [Vol VII], [Statutes]**
- **FERPA (20 U.S.C. § 1232g; 34 C.F.R. Part 99; 41 Disclosures): [Registry], [Addendum A], [Vol V], [Vol VI], [Vol VIII]**
- **Florida A&M University (FAMU Transfer Matrix): [Updated CV], [Vol X]**
- **Florida Board of Nursing (BON — Fla. Stat. ch. 464): [Registry], [Updated CV], [Vol IV], [Vol X]**
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- **`NSG 520`, `NSG 521`, `NSG 522`, `NSG 523`, `NU 700`, `NU 725`, `NU 730`, `NU 760`: [Vol II], [Vol III], [Vol V]**
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