



# HIGHER LEARNING COMMISSION

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August 26, 2019

President Douglas Jensen  
Rock Valley College  
3301 N. Mulford Rd.  
Rockford, IL 61114-5699

Dear President Jensen:

The interim report you submitted to our office has now been reviewed. The staff analysis of the report is attached.

On behalf of the Higher Learning Commission staff received the report on compliance with the Conflict of Interest Policy. No further reports are required on this topic.

An interim report is due 9/30/2020 detailing 1.) the comprehensive implementation of its assessment program, including deeper faculty involvement and assessment of academic and cocurricular outcomes; 2.) development and implementation of a comprehensive strategic plan; and 3.) completion of a review of faculty credentials (including all adjunct faculty) ensuring that each individual teaching meets minimum qualifications.

The institution's next reaffirmation of accreditation is scheduled for 2024– 2025.

For more information on the interim report process contact Lil Nakutis, Accreditation Processes Manager, at [lnakutis@hlcommission.org](mailto:lnakutis@hlcommission.org). Your HLC staff liaison is John Marr ([jmarr@hlcommission.org](mailto:jmarr@hlcommission.org)); (800) 621-7440 x 104.

Thank you.

HIGHER LEARNING COMMISSION



## STAFF ANALYSIS OF INSTITUTIONAL REPORT

DATE: August 26, 2019

STAFF LIAISON: John Marr

REVIEWED BY: Steven Kapelke

**INSTITUTION:** Rock Valley College, Rockford, IL

**EXECUTIVE OFFICER:** Dr. Douglas Jensen, President

**PREVIOUS COMMISSION ACTION AND SOURCES:** An interim report is required by 9/30/2019 by action on the College's 2019 Comprehensive Evaluation.

*“Rock Valley College and its Board must come into full compliance with its Conflict of Interest policy and requirement of a signature by all Board members. This requirement is a policy adopted by the Board and is a standard Assumed Practice of the Higher Learning Commission. The Board must ensure and encourage all current and new Board members full and complete understanding of the policy and enforcement, including the consequences for failure to comply. The Board must also identify how the policy will be executed.”*

**REPORT PRESENTATION AND QUALITY:** The Rock Valley College interim report consists of a brief, clearly written narrative, supplemented with several related documents contained in the appendices. The supporting materials include the new Board Conflict of Interest Policy and related items, such as specific Statements of Economic Interest for individual Board members.

**REPORT SUMMARY:** The interim report's succinct narrative provides background to the matter addressed in the report and describes the institution's efforts to resolve them.

Specifically, the section titled “Changes Made Since the Comprehensive Site Visit” notes that the College's Board of Trustees voted on June 25, 2019 to approve an amendment to Board Policy 1:10.010. In essence the revision requires all Board members to submit to the Rock Valley College Human Resources Department a copy of the Economic Interest Statements that each must file annually with Winnebago County—enabling compliance with the Illinois Government Ethics Act.

These were submitted to the College “*within 8 business days of the approved amendment to Board Policy 1:10.010...*” According to the report, the institution will continue to work with Board members to ensure ongoing compliance with the policy. The remainder of the report consists of the documents situated in the appendices, which include the revised Board Conflict of Interest Policy, and related documents, including Economic Interest Statements from 2018 for each continuing Board member.

**REPORT ANALYSIS:** The Rock Valley College interim report provides evidence confirming that the institution has complied with HLC interim report requirements pertaining to the College’s Board of Trustees Conflict of Interest Policy.

The evidence shows that Board Policy 1.10.010 was approved on December 11, 2018, an excerpt from which—Section 7—addresses Conflicts of Interest specifically. An amendment to the policy, noted in the Report Summary section above, makes reference to the change enabling Board members to file with the College annual Economic Interest Statements rather than the more “*rigid and laborious quarterly*” reporting that had been in place previously. Although there is no complete list of Board members included in the report, Appendix C of the report consists of a memorandum naming specific Trustees, noting that each has submitted an Economic Interest Statement for 2018; the only exception is two Board members whose terms began in April 2019 and were apparently not required to submit the documents.

More generally, the Conflict of Interest Policy aligns in content with such documents common in higher education governing boards. The Policy describes how a conflict of interest may arise and Trustee responsibility in disclosing “*any real or potential conflict of interests and/or...abstain from voting on any conflict of interest.*” The Policy goes on to note Trustee responsibility to report “*political donations received from lobbying groups or political action groups.*” Finally, the Policy identifies the penalties that may result from violation of the Policy, including public censure by the Board of Trustees.

**Analysis Concluding Statement:** Rock Valley College has take appropriate steps to address HLC concerns with regard to its Board Conflict of Interest Policy. In addition to the amended policy, the report’s appendices provide separate Economic Interest Statements from each member of the Board of Trustees, verifying compliance with the amended Policy.

The Higher Learning Commission acknowledges the institution’s efforts and will not require additional reporting on this topic. (Please see the Staff Finding section below.)

**STAFF FINDING:**

Note the relevant Criterion, Core Component(s) or Assumed Practice(s): Assumed Practice A.1 pertaining to Board of Trustees conflict of interest policy.

Statements of Analysis (check one below)

Evidence demonstrates adequate progress in the area of focus.

Evidence demonstrates that further organizational attention is required in the area of focus.

Evidence demonstrates that further organizational attention and HLC follow-up are required.

Evidence is insufficient and a HLC focused visit is warranted.

**STAFF ACTION:** Receive the report on compliance with the Conflict of Interest Policy. No further reports are required on this topic.

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