INTERIM MONITORING REPORT

Institution	Chief Executive Officer	Date Submitted
Rock Valley College	Dr. Douglas Jensen	07/24/2019

Action: Interim Report regarding compliance with policy

Core Component(s): 2.C.3 The governing board preserves its independence from undue influence on the part of donors, elected officials, ownership interests, or other external parties when such influence would not be in the best interest of the institution.

Area of Focus: Rock Valley College and its Board must come into full compliance with its Conflict of Interest policy and its requirement of a signature by all Board members.

Background

In January of 2019, Rock Valley College submitted the Assurance Argument for its mid-cycle comprehensive review, and subsequently participated in a comprehensive site visit on March 4-5, 2019. As noted in the College's Assurance Argument, the Board of Trustees approved new Conflict of Interest policies at their Regular Meeting on December 11, 2018. One Conflict of Interest Policy was for members of the Board of Trustees and the other governed employees.

The site visit team noted that the College was not in compliance with Board Policy 1:10.010, the Conflict of Interest policy for members of the Board of Trustees (See Appendix A) since not all of the members had submitted a signed Conflict of Interest Form as outlined in the policy. As a result, as part of its Action Letter for the College, the Commission required an interim report on the College's efforts to implement this specific policy.

Changes Made Since Comprehensive Site Visit

In response to the notation from the site visit team regarding compliance with Board Policy 1:10.010, the College began to work with the Board to resolve any outstanding concerns or issues that might be creating a barrier to 100% compliance of the Trustees. To this end, the Board of Trustees voted to approve an amendment to Board Policy 1:10.010 at its Regular Meeting on June 25, 2019. See Appendix B for the amended policy.

In this revision the requisite to sign a quarterly Conflict of Interest Form was removed as it exceeded what is required by law in the state of Illinois. To simplify the process, members of the Board of Trustees would provide the College's Human Resource department a copy of their annual filing of the Economic Interest Statement that must be submitted each year to Winnebago County to comply with the Illinois Governmental Ethics Act.

On July 8, 2019, all required Winnebago County Statements of Economic Interest for 2018 were submitted to Human Resources. The email outlining this submission and the documentation attached are provided in Appendix C.

Conclusions

The steps taken by the College since the comprehensive site visit have resulted in an amended Board policy that is consistent with Illinois law and its requisite procedures. Within 8 business days of the approved amendment to Board Policy 1:10.010, all Trustees submitted the required Winnebago County Statement of Interest for 2018. The College will continue to work with members of the Board of Trustees to ensure that documentation is submitted annually to maintain compliance with this policy.

APPENDIX A

BOARD POLICY 1:10.010 APPROVED DECEMBER 11, 2018

ROCK VALLEY COLLEGE BOARD POLICY

1:10.010

BOARD GOVERNANCE

Section 7. Conflicts of Interest

All Trustees shall conduct themselves and College business in a manner that reflects the highest standards of ethical conduct, and in accordance with all federal, state, and local laws and regulations. This includes avoiding real and potential conflicts of interests.

A conflict of interest arises whenever the Trustee has the opportunity to influence College operations or business decisions in ways that could result in personal financial or political benefits to the Trustee or a member of a Trustee's immediate family. Personal financial benefits include, but are not limited to, direct financial payments, deferred compensation, gifts, or in-kind donations to the Trustee or immediate family member. Personal political benefits include, but are not limited to, contributions, donations, direct financial payments, loans, gifts, or in-kind donations to political campaigns or political action committees that support the Trustee.

Trustees shall voluntarily disclose any real or potential conflict of interest, and/or shall abstain from voting on any conflict of interest. Each Trustee will observe and adhere to the College's Code of Ethics Policy. In addition, Trustees shall report all political donations received from lobbying groups or political action groups. Each Trustee shall complete a Board of Trustee Conflict of Interest Form which shall report contributions including the information required by the disclosure of economic interest under the Illinois Governmental Ethics Act (5 ILCS 420/4A-102). The Board of Trustee Conflict of Interest Form shall be submitted quarterly to the College's Department of Human Resources as instructed on said form.

Violation of this policy or failure to disclose or properly identify a conflict of interest may subject the Trustee to the penalties set forth in the Public Officer Prohibited Activities Act (50 ILCS 105/0.01, et seq.), the State Officials and Employees Ethics Act (5 ILCS 430/1-1, et seq.), and/or a public censure by the Board of Trustees. Such public censure shall be made in a Board resolution which shall state the nature of the violation.

Reference: Board Report 7573 Implemented: December 11, 2018

Revised:

APPENDIX B

BOARD POLICY 1:10.010 AMENDED JUNE 25, 2019

ROCK VALLEY COLLEGE

Board Report #7620 June 25, 2019

Amendment to Board Policy 1:10.010 (Board Governance) Section 7. Conflicts of Interest

BACKGROUND:

Attached is an amendment to Board Policy 1:10.010 (Board Governance), which amends Section 7 related to the conflicts of interest policy for the Rock Valley College Board of Trustees.

The current Board Policy 1:10.010, Section 7 was adopted via Board Report 7573 on December 11, 2018. This new conflicts of interest policy put the College into compliance with the HLC Assumed Practice related to Policy Number CRRT.B.10.020, Section A. Integrity: Ethical and Responsible Conduct

The policy that was passed imposed a rather rigid and laborious quarterly reporting standard which exceeded what is required by State law. In order to simplify the compliance process for both Board of Trustees and College staff, the proposed amendment eliminates the quarterly reporting requirement, and requires Board members to provide the College Department of Human Resources a copy of the Trustees' filing of Economic Interest Statement that is required to be submitted annually to Winnebago County in conformance with the Illinois Governmental Ethics Act. Trustees would be required to submit this prior to July 1 each year.

RECOMMENDATION: In accordance with Board Policy 1:10.070, Section 3. Suspension, it is recommended that the Board of Trustees approve a temporary suspension of Board Policy 1:10.080, Amendments and Adoption of Board Policies, and waive the requirement of two readings of this board policy amendment.

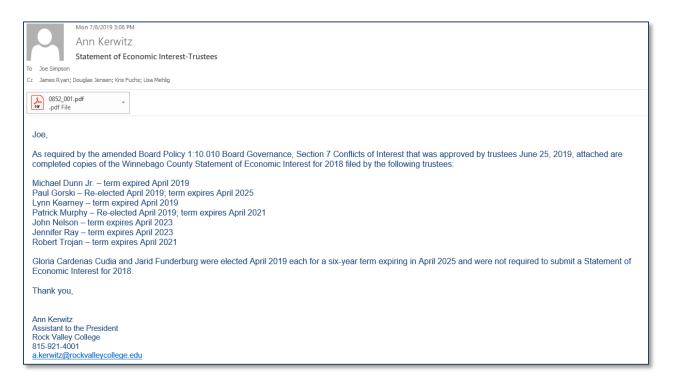
> It is recommended that the Board of Trustees approve the amendment to Board Policy 1:10.010 (Board Governance), Section 7 Conflicts of Interest effective immediately. The amendment simplifies the compliance and reporting process by requiring the Board of Trustees to provide a copy of their annual Statement of Economic Interest document to the College Department of Human Resources no later than July 1 of each year. Attorney Reviewed.

> > Douglas J. Jensen, Ed.D. President

APPENDIX C

COMPLIANCE WITH BOARD POLICY 1:10.010 AMENDED JUNE 25, 2019

Winnebago County Statements of Economic Interest for 2018



* This Statement was filed with the County Clerk's office on a paper form. In order to provide the data in a manner accessible on the web, the information from the form has been transcribed for online display. While the Clerk's office has made a good faith effort to assure accuracy and completeness, illegible or ambiguous writing may lead to transcription errors. The original paper form is available for inspection at the Clerk's office.



Statement of Economic Interests

Filed with the Winnebago County Clerk www.winnebagocountyclerk.com (815) 319-4250

DUNN, MICHAEL

Filing Date: 5/1/2019

12:00:00 AM

Your Agency

Code

Agency

Title

0040-0

ROCK VALLEY COLLEGE

BOARD OF TRUSTEES

Your Answers

1. List the name and instrument of ownership in any entity doing business with a unit of local government in relation to which the person is required to file, in which the ownership interest held by the person at the date of filing is in excess of \$5,000.00 fair market value or from which dividends in excess of \$1,200.00 were received during the preceding calendar year. (In the case of real estate, location thereof shall be listed by street address, or if none, then by legal description.) No time or demand in a financial institution, nor any debt instrument shall be listed.

ANSWER: N/A

2. List the name, address and type of practice of any professional organization in which the person making the statement was an office, director, associate, partner or proprietor or served in any advisory capacity, from which income in excess of \$1,200.00 was derived during the preceding year.

ANSWER: N/A

3. List the nature of professional services rendered (other than to the unit or units of local government in relation to which the person is required file) and the nature of the entity to which they were rendered if fees exceeding \$5,000.00 were received during the preceding calendar year from the entity for professional services rendered by the person making the statement. ("Professional services" means services rendered in the practice of law, accounting, engineering, medicine, architecture, dentistry, or clinical psychology.)

ANSWER: N/A

4. List the identity (including the address or legal description of real estate) of any capital asset from which a gain of \$5,000.00 or more was realized during the preceding calendar year.

5. List the name of any entity and the nature of the governmental action requested by any entity which has applied to a unit of local government in relation to which the person must file for any license, franchise or permit for annexation, zoning or rezoning of real estate during the preceding calendar year if the ownership interest of the person filing is in excess of \$5,000.00 fair market value at the time of filing or if income or dividends in excess of \$1,200.00 were received by the person filing from the entity during the preceding calendar year.

ANSWER: N/A

6. List the name of any entity doing business with a unit of local government in relation to which the person is required to file from which income in excess of \$1,200.00 was derived during the preceding calendar year other than for professional services and the title or description of any position held in that entity. No time or demand deposit in a financial institution nor any debt instrument need be listed.

ANSWER: N/A

7. List the name of any unit of government which employed the person making the statement during the preceding calendar year other than the unit or units of government in relation to which the person is required to file.

ANSWER: N/A

8. List the names of any entity from which a gift or gifts, or honorarium or honoraria, valued singly or in the aggregate in excess of \$500.00, was received during the preceding calendar year.



Filed with the Winnebago County Clerk www.winnebagocountyclerk.com (815) 319-4250 **GORSKI, PAUL**

Filing Date: 4/30/2019

5:28:40 PM

Your Agency

Code

Agency

Title

0040-0

ROCK VALLEY COLLEGE

BOARD OF TRUSTEES

Your Answers

1. List the name and instrument of ownership in any entity doing business with a unit of local government in relation to which the person is required to file, in which the ownership interest held by the person at the date of filing is in excess of \$5,000.00 fair market value or from which dividends in excess of \$1,200.00 were received during the preceding calendar year. (In the case of real estate, location thereof shall be listed by street address, or if none, then by legal description.) No time or demand in a financial institution, nor any debt instrument shall be listed.

ANSWER: N/A

2. List the name, address and type of practice of any professional organization in which the person making the statement was an office, director, associate, partner or proprietor or served in any advisory capacity, from which income in excess of \$1,200.00 was derived during the preceding year.

ANSWER: N/A

3. List the nature of professional services rendered (other than to the unit or units of local government in relation to which the person is required file) and the nature of the entity to which they were rendered if fees exceeding \$5,000.00 were received during the preceding calendar year from the entity for professional services rendered by the person making the statement. ("Professional services" means services rendered in the practice of law, accounting, engineering, medicine, architecture, dentistry, or clinical psychology.)

ANSWER: N/A

4. List the identity (including the address or legal description of real estate) of any capital asset from which a gain of \$5,000.00 or more was realized during the preceding calendar year.

ANSWER: N/A

6. List the name of any entity doing business with a unit of local government in relation to which the person is required to file from which income in excess of \$1,200.00 was derived during the preceding calendar year other than for professional services and the title or description of any position held in that entity. No time or demand deposit in a financial institution nor any debt instrument need be listed.

ANSWER: N/A

7. List the name of any unit of government which employed the person making the statement during the preceding calendar year other than the unit or units of government in relation to which the person is required to file.

ANSWER: N/A

8. List the names of any entity from which a gift or gifts, or honorarium or honoraria, valued singly or in the aggregate in excess of \$500.00, was received during the preceding calendar year.



Filed with the Winnebago County Clerk www.winnebagocountyclerk.com (815) 319-4250

KEARNEY, LYNN

Filing Date: 4/15/2019

1:45:12 PM

Your Agency

Code

Agency

Title

0040-0

ROCK VALLEY COLLEGE

BOARD OF TRUSTEES

Your Answers

1. List the name and instrument of ownership in any entity doing business with a unit of local government in relation to which the person is required to file, in which the ownership interest held by the person at the date of filing is in excess of \$5,000.00 fair market value or from which dividends in excess of \$1,200.00 were received during the preceding calendar year. (In the case of real estate, location thereof shall be listed by street address, or if none, then by legal description.) No time or demand in a financial institution, nor any debt instrument shall be listed.

ANSWER: N/A

2. List the name, address and type of practice of any professional organization in which the person making the statement was an office, director, associate, partner or proprietor or served in any advisory capacity, from which income in excess of \$1,200.00 was derived during the preceding year.

Name of Professional Organization: IL FEDERATION OF TEACHERS Type of Professional Organization: Other Type

ANSWER: of Professional Organization Other: TEACHER'S UNION Role: Officer Address 1: PO BOX 390 City:

WESTMONT State: IL Zip: 60559-5520

3. List the nature of professional services rendered (other than to the unit or units of local government in relation to which the person is required file) and the nature of the entity to which they were rendered if fees exceeding \$5,000.00 were received during the preceding calendar year from the entity for professional services rendered by the person making the statement. ("Professional services" means services rendered in the practice of law, accounting, engineering, medicine, architecture, dentistry, or clinical psychology.)

ANSWER: N/A

4. List the identity (including the address or legal description of real estate) of any capital asset from which a gain of \$5,000.00 or more was realized during the preceding calendar year.

ANSWER: N/A

5. List the name of any entity and the nature of the governmental action requested by any entity which has applied to a unit of local government in relation to which the person must file for any license, franchise or permit for annexation, zoning or rezoning of real estate during the preceding calendar year if the ownership interest of the person filing is in excess of \$5,000.00 fair

market value at the time of filing or if income or dividends in excess of \$1,200.00 were received by the person filing from the entity during the preceding calendar year.

ANSWER: N/A

6. List the name of any entity doing business with a unit of local government in relation to which the person is required to file from which income in excess of \$1,200.00 was derived during the preceding calendar year other than for professional services and the title or description of any position held in that entity. No time or demand deposit in a financial institution nor any debt instrument need be listed.

ANSWER: N/A

7. List the name of any unit of government which employed the person making the statement during the preceding calendar year other than the unit or units of government in relation to which the person is required to file.

ANSWER: N/A

8. List the names of any entity from which a gift or gifts, or honorarium or honoraria, valued singly or in the aggregate in excess of \$500.00, was received during the preceding calendar year.



Filed with the Winnebago County Clerk www.winnebagocountyclerk.com (815) 319-4250 **MURPHY, PATRICK**

Filing Date: 4/17/2019

1:41:31 PM

Your Agency

Code

Agency

Title

0040-0

ROCK VALLEY COLLEGE

BOARD OF TRUSTEES

Your Answers

1. List the name and instrument of ownership in any entity doing business with a unit of local government in relation to which the person is required to file, in which the ownership interest held by the person at the date of filing is in excess of \$5,000.00 fair market value or from which dividends in excess of \$1,200.00 were received during the preceding calendar year. (In the case of real estate, location thereof shall be listed by street address, or if none, then by legal description.) No time or demand in a financial institution, nor any debt instrument shall be listed.

ANSWER: N/A

2. List the name, address and type of practice of any professional organization in which the person making the statement was an office, director, associate, partner or proprietor or served in any advisory capacity, from which income in excess of \$1,200.00 was derived during the preceding year.

ANSWER: N/A

3. List the nature of professional services rendered (other than to the unit or units of local government in relation to which the person is required file) and the nature of the entity to which they were rendered if fees exceeding \$5,000.00 were received during the preceding calendar year from the entity for professional services rendered by the person making the statement. ("Professional services" means services rendered in the practice of law, accounting, engineering, medicine, architecture, dentistry, or clinical psychology.)

ANSWER: N/A

4. List the identity (including the address or legal description of real estate) of any capital asset from which a gain of \$5,000.00 or more was realized during the preceding calendar year.

ANSWER: N/A

6. List the name of any entity doing business with a unit of local government in relation to which the person is required to file from which income in excess of \$1,200.00 was derived during the preceding calendar year other than for professional services and the title or description of any position held in that entity. No time or demand deposit in a financial institution nor any debt instrument need be listed.

ANSWER: N/A

7. List the name of any unit of government which employed the person making the statement during the preceding calendar year other than the unit or units of government in relation to which the person is required to file.

ANSWER: N/A

8. List the names of any entity from which a gift or gifts, or honorarium or honoraria, valued singly or in the aggregate in excess of \$500.00, was received during the preceding calendar year.

Office or Position of Employment for which this statement is filed

(TYPE OR HAND PRINT)

Name 3413 Sage Orive

Address Pack Form The GUILLY

State

This section will be returned to

you when the Statement is filed

City

Receipt is hereby acknowledged of your Statement of Economic Interests, filed pursuant to the Illinois Governmental Ethics Act. The Statement was filed on this date:

JUN 2 0 2019

LORI GUMMOW

Printed by authority of the State of Illinois. October 2008 — 89M — I 107.9

(COMPLETE BUT DO NOT DETACH)

* This Statement was filed with the County Clerk's office on a paper form. In order to provide the data in a manner accessible on the web, the information from the form has been transcribed for online display. While the Clerk's office has made a good faith effort to assure accuracy and completeness, illegible or ambiguous writing may lead to transcription errors. The original paper form is available for inspection at the Clerk's office.



Statement of Economic Interests

Filed with the Winnebago County Clerk www.winnebagocountyclerk.com (815) 319-4250 **NELSON, JOHN**

Filing Date: 6/20/2019

12:00:00 AM

Your Agency

Code

Agency

Title

0040-0

ROCK VALLEY COLLEGE

BOARD OF TRUSTEES

Your Answers

1. List the name and instrument of ownership in any entity doing business with a unit of local government in relation to which the person is required to file, in which the ownership interest held by the person at the date of filing is in excess of \$5,000.00 fair market value or from which dividends in excess of \$1,200.00 were received during the preceding calendar year. (In the case of real estate, location thereof shall be listed by street address, or if none, then by legal description.) No time or demand in a financial institution, nor any debt instrument shall be listed.

ANSWER: N/A

2. List the name, address and type of practice of any professional organization in which the person making the statement was an office, director, associate, partner or proprietor or served in any advisory capacity, from which income in excess of \$1,200.00 was derived during the preceding year.

ANSWER:

Name of Professional Organization: JOHN M. NELSON LAW OFFICES Type of Professional Organization: Law Role: Other Role Other: UNKNOWN Address 1: 1318 E. STATE ST City: ROCKFORD State: IL Zip: 61104

3. List the nature of professional services rendered (other than to the unit or units of local government in relation to which the person is required file) and the nature of the entity to which they were rendered if fees exceeding \$5,000.00 were received during the preceding calendar year from the entity for professional services rendered by the person making the statement. ("Professional services" means services rendered in the practice of law, accounting, engineering, medicine, architecture, dentistry, or clinical psychology.)

ANSWER:

Professional Service: Law **Nature of Entity**: Other **Nature of Entity - Other**: FEDERAL DEFENDER PANEL ATTORNEY TOWNSHIP ATTORNEY FOR HARLEM AND PECATONICA TOWNSHIPS

4. List the identity (including the address or legal description of real estate) of any capital asset from which a gain of \$5,000.00 or more was realized during the preceding calendar year.

5. List the name of any entity and the nature of the governmental action requested by any entity which has applied to a unit of local government in relation to which the person must file for any license, franchise or permit for annexation, zoning or rezoning of real estate during the preceding calendar year if the ownership interest of the person filing is in excess of \$5,000.00 fair market value at the time of filing or if income or dividends in excess of \$1,200.00 were received by the person filing from the entity during the preceding calendar year.

ANSWER: N/A

6. List the name of any entity doing business with a unit of local government in relation to which the person is required to file from which income in excess of \$1,200.00 was derived during the preceding calendar year other than for professional services and the title or description of any position held in that entity. No time or demand deposit in a financial institution nor any debt instrument need be listed.

ANSWER: N/A

7. List the name of any unit of government which employed the person making the statement during the preceding calendar year other than the unit or units of government in relation to which the person is required to file.

ANSWER: Unit of Government: Other Unit of Government - Other: SEE IN OFFICE Title: SEE IN OFFICE

8. List the names of any entity from which a gift or gifts, or honorarium or honoraria, valued singly or in the aggregate in excess of \$500.00, was received during the preceding calendar year.



Filed with the Winnebago County Clerk www.winnebagocountyclerk.com (815) 319-4250 **RAY, JENNIFER**

Filing Date: 5/29/2019

4:30:28 PM

Your Agency

Code

Agency

Title

0040-0

ROCK VALLEY COLLEGE

BOARD OF TRUSTEES

Your Answers

1. List the name and instrument of ownership in any entity doing business with a unit of local government in relation to which the person is required to file, in which the ownership interest held by the person at the date of filing is in excess of \$5,000.00 fair market value or from which dividends in excess of \$1,200.00 were received during the preceding calendar year. (In the case of real estate, location thereof shall be listed by street address, or if none, then by legal description.) No time or demand in a financial institution, nor any debt instrument shall be listed.

ANSWER: N/A

2. List the name, address and type of practice of any professional organization in which the person making the statement was an office, director, associate, partner or proprietor or served in any advisory capacity, from which income in excess of \$1,200.00 was derived during the preceding year.

ANSWER: N/A

3. List the nature of professional services rendered (other than to the unit or units of local government in relation to which the person is required file) and the nature of the entity to which they were rendered if fees exceeding \$5,000.00 were received during the preceding calendar year from the entity for professional services rendered by the person making the statement. ("Professional services" means services rendered in the practice of law, accounting, engineering, medicine, architecture, dentistry, or clinical psychology.)

ANSWER: N/A

4. List the identity (including the address or legal description of real estate) of any capital asset from which a gain of \$5,000.00 or more was realized during the preceding calendar year.

ANSWER: N/A

6. List the name of any entity doing business with a unit of local government in relation to which the person is required to file from which income in excess of \$1,200.00 was derived during the preceding calendar year other than for professional services and the title or description of any position held in that entity. No time or demand deposit in a financial institution nor any debt instrument need be listed.

ANSWER: N/A

7. List the name of any unit of government which employed the person making the statement during the preceding calendar year other than the unit or units of government in relation to which the person is required to file.

ANSWER: N/A

8. List the names of any entity from which a gift or gifts, or honorarium or honoraria, valued singly or in the aggregate in excess of \$500.00, was received during the preceding calendar year.



Filed with the Winnebago County Clerk www.winnebagocountyclerk.com (815) 319-4250

TROJAN, BOB

Filing Date: 4/25/2019

10:49:08 AM

Your Agency

Code

Agency

Title

0040-0

ROCK VALLEY COLLEGE

BOARD OF TRUSTEES

Your Answers

1. List the name and instrument of ownership in any entity doing business with a unit of local government in relation to which the person is required to file, in which the ownership interest held by the person at the date of filing is in excess of \$5,000.00 fair market value or from which dividends in excess of \$1,200.00 were received during the preceding calendar year. (In the case of real estate, location thereof shall be listed by street address, or if none, then by legal description.) No time or demand in a financial institution, nor any debt instrument shall be listed.

ANSWER: N/A

2. List the name, address and type of practice of any professional organization in which the person making the statement was an office, director, associate, partner or proprietor or served in any advisory capacity, from which income in excess of \$1,200.00 was derived during the preceding year.

ANSWER: N/A

3. List the nature of professional services rendered (other than to the unit or units of local government in relation to which the person is required file) and the nature of the entity to which they were rendered if fees exceeding \$5,000.00 were received during the preceding calendar year from the entity for professional services rendered by the person making the statement. ("Professional services" means services rendered in the practice of law, accounting, engineering, medicine, architecture, dentistry, or clinical psychology.)

ANSWER: N/A

4. List the identity (including the address or legal description of real estate) of any capital asset from which a gain of \$5,000.00 or more was realized during the preceding calendar year.

ANSWER: N/A

6. List the name of any entity doing business with a unit of local government in relation to which the person is required to file from which income in excess of \$1,200.00 was derived during the preceding calendar year other than for professional services and the title or description of any position held in that entity. No time or demand deposit in a financial institution nor any debt instrument need be listed.

ANSWER: N/A

7. List the name of any unit of government which employed the person making the statement during the preceding calendar year other than the unit or units of government in relation to which the person is required to file.

ANSWER: N/A

8. List the names of any entity from which a gift or gifts, or honorarium or honoraria, valued singly or in the aggregate in excess of \$500.00, was received during the preceding calendar year.