



October 15, 2015

Dr. Joseph Collins, Acting Interim President
College of DuPage
425 Fawell Blvd.
Glen Ellyn, IL 60137-6599

Dear Dr. Collins:

I am writing with regard to the special monitoring of College of DuPage (“the College”). On April 29, 2015, I wrote to notify you that the Higher Learning Commission (“HLC”) was sending an Advisory Visit team to investigate allegations related to institutional finances, ethics violations, changes to assigned credit hours for courses offered through the Suburban Law Enforcement Academy, and other matters at the College. I further notified you that, although the team had the authority to review the College’s compliance with all of the Criteria for Accreditation, it was specifically charged with reviewing the College’s compliance with the following:

- Criterion One, Core Component 1.D, “the institution’s mission demonstrates commitment to the public good,” including but not limited to Core Component 1.D.2, “the institution’s educational responsibilities take primacy over other purposes, such as generating financial returns for investors, contributing to a related or parent organization, or supporting external interests,” with regard to public concerns about whether the College is appropriately dedicated to its mission and demonstrating commitment to its mission by ensuring that educational responsibilities are primary rather than secondary to supporting other interests;
- Criterion Two, Core Component 2.A, “the institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows policies and processes for fair and ethical behavior on the part of its governing board, administration, faculty, and staff,” because it is not clear based on these reports that the College has or follows effective policies and processes to support its operations and decision-making. Because of this concern, I am also asking that the team review Assumed Practice A1, “the institution has a conflict of interest policy that ensures that the governing board and the senior administrative personnel act in the best interest of the institution;”
- Criterion Two, Core Component 2.C, “the governing board of the institution is sufficiently autonomous to make decisions in the best interest of the institution and to assure its integrity,” including but not limited to Core Component 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,” because of concerns about apparent conflicts of interest and self-dealing. These allegations raise questions regarding whether the Board has sufficient autonomy to act outside the agendas of individual Board members and consistently acts in the interest of College constituents or whether the Board is influenced by other interests;
- Criterion Three, Core Component 3.A, “the institution’s degree programs are appropriate to higher education,” due to information regarding the change in assigned credit hours for a program without a concomitant change in instructional or educational program requirements;

- Criterion Four, Core Component 4.A, “the institution demonstrates responsibility for the quality of its educational programs,” related to the questions raised regarding the Suburban Law Enforcement Academy, the changes to its program, and resulting changes to College data points such as enrollment of students based on full-time equivalency; and
- Criterion Five, Core Component 5.B, “the institution’s governance and administrative structures promote effective leadership and support collaborative processes that enable the institution to fulfill its mission,” and specifically Core Component 5.B.1, “the governing board is knowledgeable about the institution; it provides oversight of the institution’s financial and academic policies and practices and meets its legal and fiduciary responsibilities,” because it is not clear that the Board and administration have provided effective leadership.

The Advisory Visit took place on July 21-22, 2015. The team subsequently compiled its findings regarding the College’s compliance with Commission requirements in a report. As is typical with an Advisory Visit, the report makes no recommendation regarding Commission action. With this letter I am providing you with the Advisory Visit Team Report to you along with the options available to the Board in policy based on the findings of the team.

The evaluation team determined that the College does not currently meet Core Component 2.A related to issues of integrity; and Core Component 5.B related to issues of effectiveness of administration and governance. In addition, the evaluation team determined that the College meets Core Components 1.D, 2.C, 3.A, and 4.A. but with concerns.

Because the team has found that one or more Core Components are not met, the Board will consider imposing the sanction of Probation. The Board may also consider the sanction of Notice if the Board concludes that these Core Components are met but with concerns.

The sanction of Probation is disclosed publicly by HLC and indicates that an institution is not in compliance with one or more of the Criteria for Accreditation. An institution that is placed on Probation must host a comprehensive evaluation visit within no more than two years from the date the sanction is imposed to demonstrate that it meets all the Criteria for Accreditation and has remedied all the issues that led to the imposition of the sanction. At the end of the Probation period, HLC’s Board of Trustees determines whether to remove the institution from Probation or withdraw its accredited status. (See Commission policy INST.E.10.010 for more information about sanctions, Show-Cause and related policies.) It is important to note that an institution on Probation remains accredited. The Board, at its discretion, may determine based on the findings of non-compliance that a Show-Cause Order is warranted instead of Probation.

Alternatively, the Board may conclude the College meets these Core Components but is at risk for non-compliance in the future if these issues are not immediately resolved and may impose the lesser sanction of Notice. The Board may also determine that the HLC should continue to monitor the institution but not impose either a sanction or show-cause.

The report of the Advisory Visit team is enclosed for your review. You have the option of providing a response to the report and to this recommendation, which I will need to receive no later than October 29, 2015. In that response, you should identify any errors of fact in the evaluation team report as well as respond to the substantive findings. The Board will consider the team report, its options for action as noted above, and your response at its next meeting in November 2015, or at subsequent follow-up meeting. The action of the Board will be communicated to you following its meeting.

Dr. Joseph Collins, Acting Interim President
College of DuPage
October 15, 2015

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If you have any questions, please contact your staff liaison, Dr. Barbara Johnson.

Sincerely,

A handwritten signature in black ink that reads "Barbara Gellman-Danley". The signature is written in a cursive style with a large initial 'B'.

Barbara Gellman-Danley
President

Enclosure

Cc: Mr. James Bente, Vice President for Planning & Institutional Effectiveness, College of DuPage
Dr. Barbara Johnson, Vice President for Accreditation Relations, Higher Learning Commission