

# SB24-164 Institution of Higher Education Transparency Requirements

Quick Summary and Implementation Plan Updates

September 2025



# SB24-164: Five Key Elements

- ✓ Expand General Education Council
- ✓ Improve transfer within GT Pathways
  - ✓ Annual GE Council Recommendations
- ❖ Transfer admissions notification
- ❖ SMART Act reporting
- ❖ Student appeals process

# CDHE Implementation Leads

- Carl Einhaus, Chief Student Success and Academic Affairs Officer (Main Lead)
- Michael Vente, Chief Performance Officer and Senior Director of Research and Data Governance
- Liliana Diaz Solodukhin, Senior Director of Student Success and P20 Alignment
- Brad Griffith, Senior Director of Academic Pathways and Innovation
- Christina Carrillo, Academic Policy Officer and Advocate

# CDHE Implementation - One-Time Charges

## 1. Review and Interpret Legislation

- Analyzed SB24-164 to identify new responsibilities, authority, and reporting requirements.
- Mapped changes against existing CRS 23-1-108.5 obligations.

## 2. Develop Implementation Guidance

- Drafted policies, procedures, and checklists for compliance monitoring.
- Created standardized templates for institutional reporting and data submissions.

## 3. Rulemaking for New Enforcement Authority

- Establish new and clarified department student complaints process.
- Define criteria for determining institutional non-compliance.
- Establish a process for investigations, corrective action plans, and sanctions.

## 4. Update Reporting Requirements

- Establish SURDS and other reporting requirements to collect necessary data to analyze GT Pathways.

## 5. Stakeholder Communication

- Notified IHEs about SB24-164's requirements and changes in relation to work with CDHE.
- Provided training webinars, written guidance, FAQs, and 1:1 consultations for technical assistance.

## 6. Legal and Procedural Alignment

- Coordinated with AG's office to confirm scope of enforcement authority and reporting requirements.
- Aligning with state administrative procedures for due process if and when sanctions are applied.

## 7. Staff Onboarding and Training

- Trained CDHE compliance and data teams on new processes and reporting tools.
- Assigned responsibilities across divisions as applicable.

# 65+ Stakeholder Meetings Held Since October 2024

- **Internal CDHE Coordination** – 20+ staff meetings (academic team, reporting, rulemaking)
- **Townhall Prep & Delivery** – 9 CDHE prep meetings + 2 external townhalls held
- **CDHE/IHE Cross-Functional Workgroup Meetings** - 7 working sessions held
- **General Education Council Meetings** – 8 working sessions held + production of annual report
- **Institution-Specific Consultations** – 5+ institutional troubleshooting sessions held
- **More Stakeholder Briefings** – 15+ meetings among the Faculty Advisory Council, Admissions Council, Academic Council, Data Advisory Group, CCHE Student Success & Workforce Alignment Committee, and external nonprofits/thinktanks

*CDHE staff estimate a combined .5 FTE staff capacity is required to support ongoing work for SB24-164 among department leads.*

# CDHE Implementation - Recurring Charges

## 1. Collect Institutional Reports

1. Receive annual reports from institutions on GT Pathways courses.
2. Verify completeness and accuracy of submissions.
3. Compile data for analysis by General Education Council.

## 2. Conduct Audits / Reviews

1. Perform desktop reviews to verify compliance with statute.
2. Request supplemental documentation from institutions as needed.

## 3. Enforcement Actions

1. Issue notices of non-compliance when institutions fall short on GT Pathways transfers.
2. Develop corrective action plans, monitor resolution, and escalate sanctions if unresolved.

## 4. Reports to the Legislature and Commission

1. Prepare statutory compliance reports to the General Assembly as required by SB24-164.
2. Provide data summaries, enforcement activity outcomes, and policy recommendations to CCE advisory groups.
3. Prepare annual General Education Council recommendations to the Commission to improve GTP transfers.

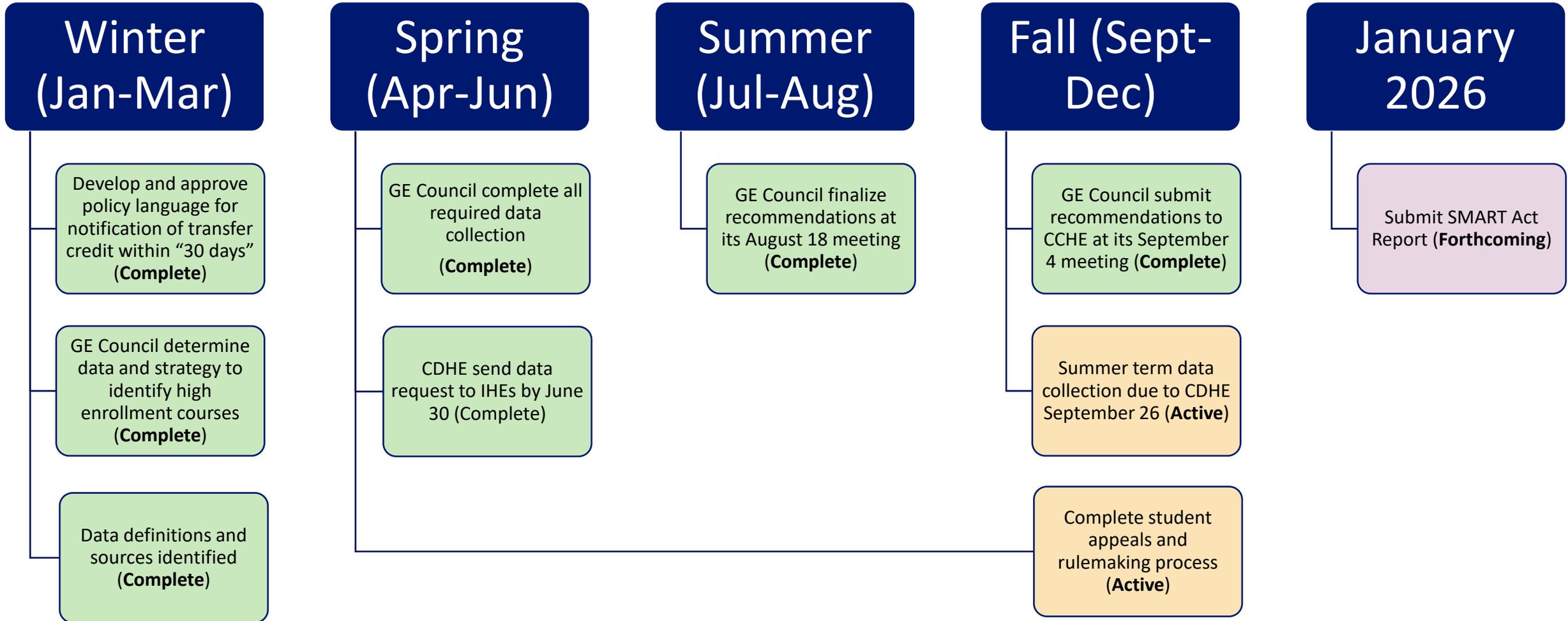
## 5. Internal Review & Adjustment

1. Periodically reassess enforcement framework for effectiveness.
2. Update guidance and templates to reflect evolving practices or legal clarifications.

## 6. Stakeholder Engagement

1. Continue communications with institutions, answering questions and offering technical support.
2. Convene working groups or advisory committees if required.

# Timeline - Summary



# SB24-164 Modified the Student Bill of Rights for the First Time Since 2001

*Added the following to the Student Bill of Rights in 23-1-125:*

1. Transparency of cost of postsecondary education programs;
2. \*\* Seamless transfer of guarantee transfer pathway matrix courses;
3. \*\* Timely and transparent response on requests for transfer credit;
4. The right to appeal an institution's decision on transfer courses; and
5. The right to know about credit for work-related experience per HB20-1002

\*\* Policy updates approved at the January 3, 2025, CCHE meeting)

A yellow graduation tassel is the central focus, resting on a light-colored wooden surface. The tassel has a small, knotted top and a long, flowing fringe. In the background, a graduation cap is visible, slightly out of focus, and a window with a grid pattern is also blurred. The overall lighting is soft and warm, creating a serene and celebratory atmosphere.

# Notification of Transfer Credit

# Key Elements/Mandated Actions:

*Notify students of decisions on transfer credit within 30 days of a commitment to enroll (including the which, the how, and the why not) AND re-evaluate transfer credit when a student changes majors*

- Policy for notification of transfer credit was approved by CCHE on March 7, 2025
- Policy applies to both undergraduate and graduate students who apply for admission and are accepted into an institution
- Institutions of higher education shall provide students with a determination of the acceptance or denial of transfer credit within 30 calendar days after the student meets all stated criteria:
  - Student is admitted; and
  - Institution receives official college transcripts and/or official documents for course credit (including official transcripts and documents received after admission)

# Key Elements/Mandated Actions:

*Notify students of decisions on transfer credit within 30 days of a commitment to enroll (including the which, the how, and the why not) AND re-evaluate transfer credit when a student changes majors (cont.)*

- Policy also applies to an admitted and enrolled student who has an approved major, or program of study, change
- Institutions of higher education must conduct a re-evaluation of a student's transfer credits within 30 calendar days of a student's approved request to change a major or program of study
- **30 calendar days:** if the last day of the 30-day period is a Saturday, Sunday, or legal holiday, the period is extended to include the next day which is not a Saturday, Sunday, or legal holiday
- Institutions shall publish their process and timeline for reviewing and making decisions regarding transfer credit requests on their website **no later than September 1, 2025.**



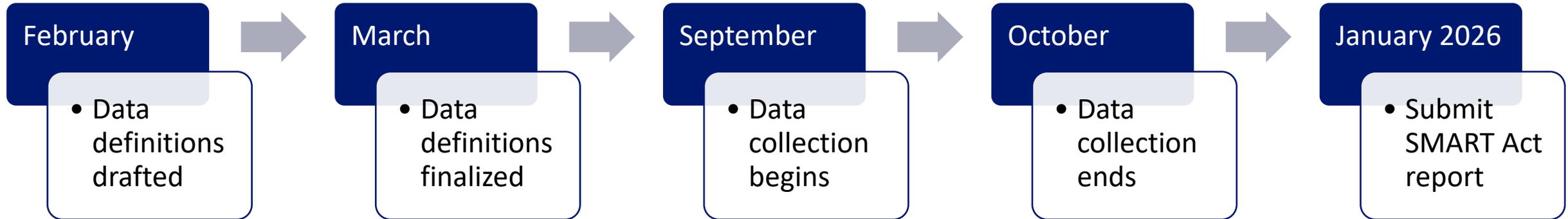
# SMART Act Reporting

# Key Elements/Mandated Actions:

*Requires institutional reporting on transfer activity, including student completion data, for SMART Act presentation (starting in 2026)*

- Components of the data will be provided by two sources
  - Institutions of higher education (final reporting template sent to IHEs in May 2025)
  - SURDS (Student Unit Record Data System)
- Reporting elements are limited to GT Pathways courses
- CDHE staff engaged a cross-section of registrars, admissions officers, institutional research officers, and academic administrators to operationalize terms to ensure consistent interpretation across institutions

# Timeline - SMART Act Reporting



The background of the image is a dense, overlapping stack of numerous books. The spines of the books are visible, showing various colors like red, green, and blue. The pages are mostly off-white or light beige, creating a textured, layered effect. The lighting is soft and even, highlighting the edges of the pages and the thickness of the books.

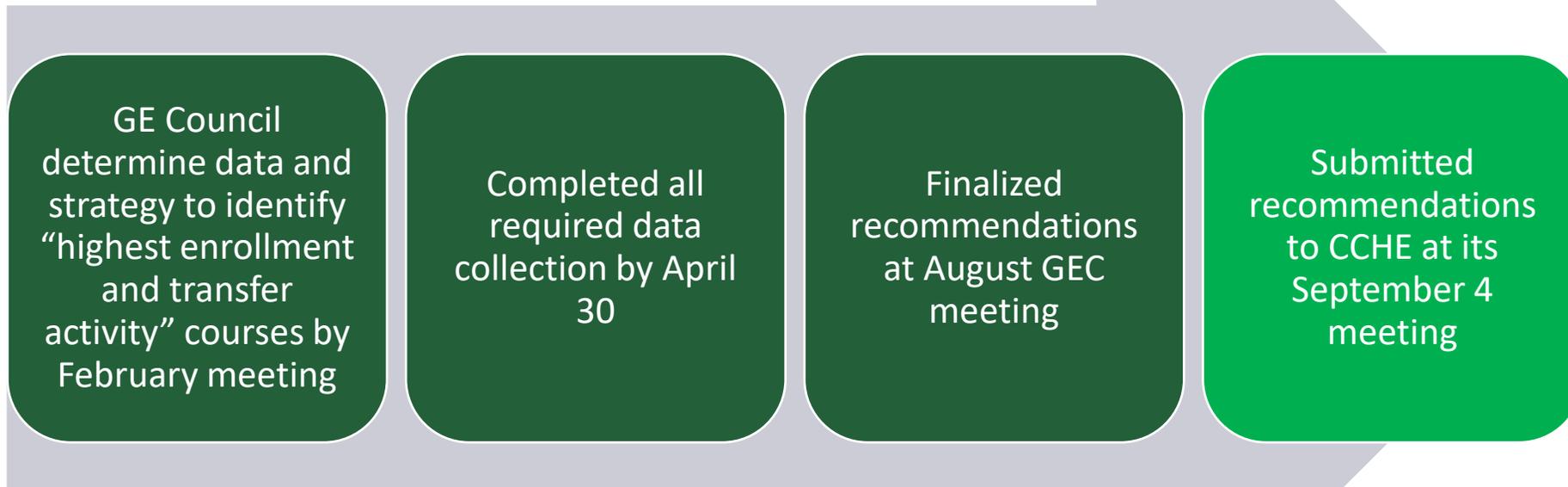
# GT Pathways Courses

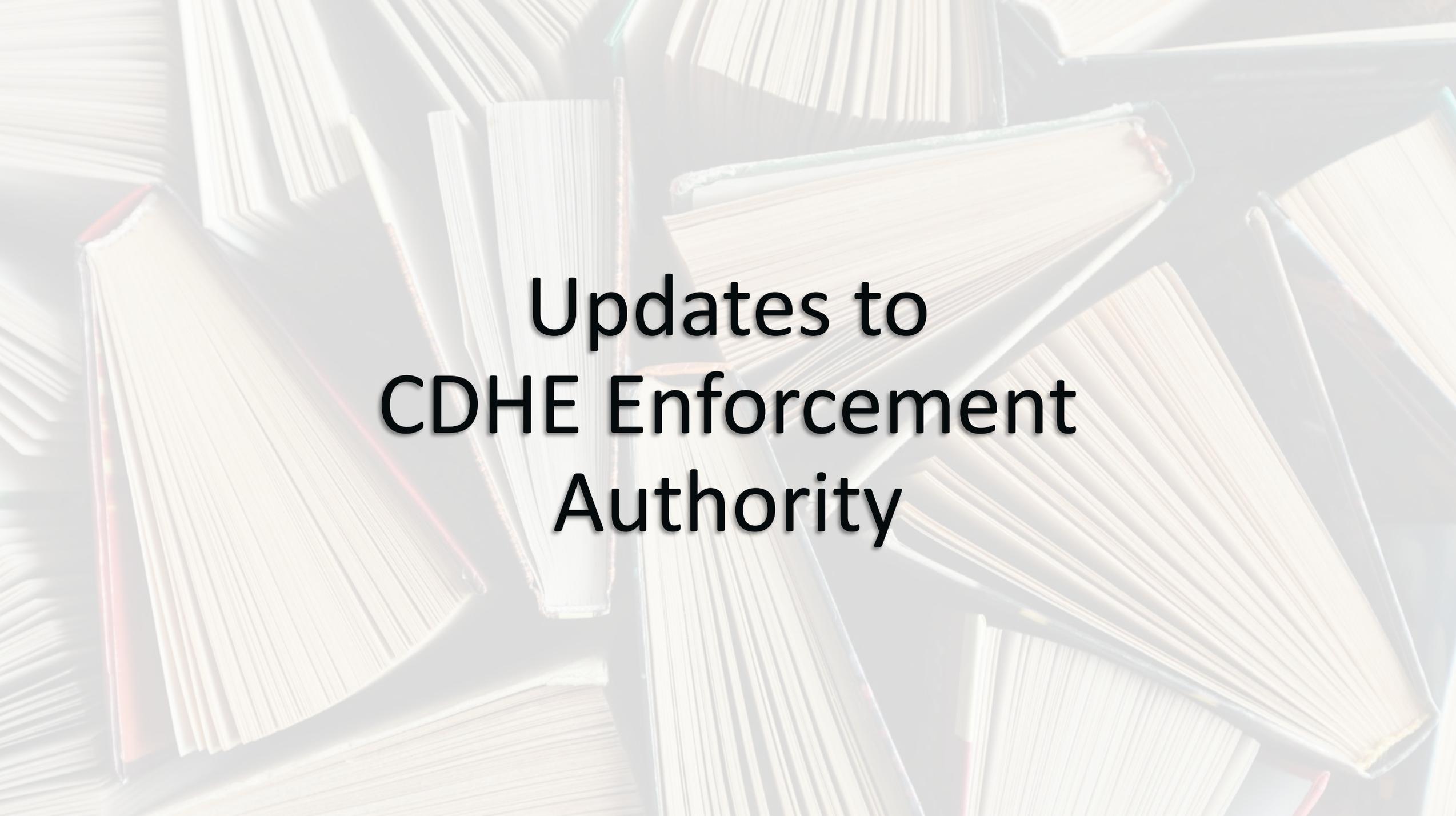
# Key Elements/Mandated Actions:

*Identify high volume courses that may be problematic in transfer and recommend changes to the Commission (by 10/1/25 then annually)*

- Ongoing **monthly discussions** with the General Education Council (GE Council)
- GE Council has reviewed:
  - list of highest enrollment courses
  - the top 10 most used STAAs/DwDs and GT Pathways courses that are required for academic majors
  - courses that have misaligned credit values (e.g., world languages, mathematics, and science courses with laboratory)
  - institutional policies regarding misaligned credit values

# Timeline - Identify High Enrollment Courses (Deadline: October 1)



The background of the slide is a close-up, slightly blurred view of numerous books stacked together. The spines of the books are visible, showing various colors like red, green, and blue. The pages are a light cream or off-white color, and the overall lighting is soft and even.

# Updates to CDHE Enforcement Authority

# Key Elements/Mandated Actions:

*Revision to CRS 23-1-108.5 to add (8)(a) The department has exclusive authority to bring an enforcement action on behalf of the state against an institution for a violation of this section.*

- Requires CDHE to issue a notice of violation before bringing an enforcement action.
- CDHE has the power to overturn institutional decisions for gtPathways course transfers.
- Allows the Department to promulgate rules for this section:
  - CDHE must file a Notice of Proposed Rulemaking with the Secretary of State to publish rules in the Colorado Code of Regulations.

# Potential Department Enforcement Process for CRS 23-1-108.5

- 1. Violation identified with informal notification:** If the Department believes a higher education institution has violated a requirement of § 23-1-108.5 (for example, improperly denying transfer credit under the guaranteed transfer pathway matrix, or failing to publish required timelines, etc.), the Department will first begin with an informal notification via email to the institution's General Education and Academic Council representatives. An institution response will be requested of whether it agrees with, partially agrees with, or rejects the Department's recommendation for remediation. If the informal remediation is acceptable to the Department, the issue is considered resolved.
- 2. Formal Notice of Violation:** The Department must give formal notice to the institution, describing the violation and explaining how it may be remedied (if that's possible). The institution has **3 months** from receipt of the notice to remedy the violation.
- 3. Enforcement Action:** If the institution fails to remedy within the 3-month cure period, the Department may then bring a formal enforcement action through Court Order (without fine).
- 4. Overturning Transfer Decisions:** As part of enforcement, the Department can overturn institutional decisions about course transfer for courses under the guaranteed transfer pathway matrix that violate the statute.
- 5. Student Appeals:** Independently, students have a right to appeal an institution's decision to deny credit for courses in the matrix. The Department will establish an appeals process.

# Summary

GE Council expansion complete

Work to improve transfer within GT Pathways underway

Policy for transfer admission notification was approved by CCHE on March 7, 2025

Cross-functional working group assisted with definitions and implementation of 30-day notification and SMART Act reporting

Student appeals process developed under development by CDHE

CDHE will initiate rulemaking in fall 2025

A group of graduates in silhouette stands on a hill at sunset, celebrating with their arms raised and caps flying in the air. The word "Questions?" is overlaid in white text in the center of the image.

Questions?

# Contact Info

CDHE Academic Affairs

[Academic.Affairs@dhe.state.co.us](mailto:Academic.Affairs@dhe.state.co.us)

# Thank You!

**SB24-164**

September 2025

