

# SB24-164 Institution of Higher Education Transparency Requirements

Summary and Implementation Plan Updates

January 2025

# 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
- Christina Carrillo, Academic Policy Officer and Advocate

# SB24-164: Five Key Elements

- Expand General Education Council
- Improve transfer within GT Pathways
- Transfer admissions notification
- SMART Act reporting
- Student appeals process

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

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

Transparency of cost of postsecondary education programs;

\*\* Seamless transfer of guarantee transfer pathway matrix courses;

\*\* Timely and transparent response on requests for transfer credit;

The right to appeal an institution's decision on transfer courses; and

The right to know about credit for work-related experience per HB20-1002

**\*\* CCHE to adopt relevant policies by April 1, 2025**

# Key Elements/Mandated Actions:

*Expand the General Education Council to include one representative from each of the 31 public institutions of higher education (by 12/31/24)*

- Completed 9/9/24
- Retreat held 10/21/24 with 28 institutions represented (including 22 in person)

# 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 on strategies for identification including SURDS data pulls and possible transcript analysis
- Early course identification includes:
  - Math and world language courses (differing credit values)
  - Natural sciences (differences in treatment of labs)
  - Written communication (CO2/CO3 requirements at Boulder and Fort Collins)
  - Intro courses in social and natural sciences not applying toward major requirements

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

GE Council determine data and strategy to identify “highest enrollment and transfer activity” courses by February meeting

Complete all required data collection by April 30

Finalize recommendations at August GEC meeting

Submit recommendations to CCHE at its September 4 meeting

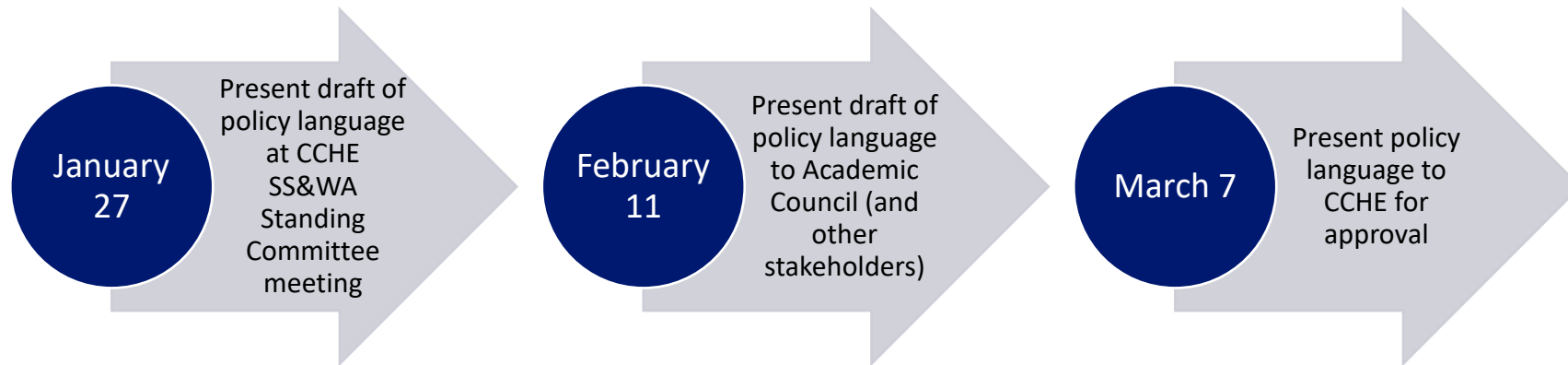
# Key Elements/Mandated Actions:

*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*

- CDHE staff engaging a cross-section of registrars, admissions officers, institutional research officers, and academic administrators to operationalize terms and ensure consistent interpretation across institutions
- The 30-day clock proposed to begin once all three criteria are met: 1) the student is admitted; 2) the student requests a transfer determination in writing, which can include email; and 3) the student has provided *\*all\** required documentation for evaluation, including official transcripts.
- For open admissions institutions where a student is not “admitted,” the Commission has authority to make the determination on what proxy should be used to determine “admitted.”
- Additional clarification will be sought from COAG on whether the 30-day clock re-starts every time a new official transcript is received by the institution.



# Timeline - Develop Policy for Notification of Transfer Credit within “30-days” (Deadline: April 1)

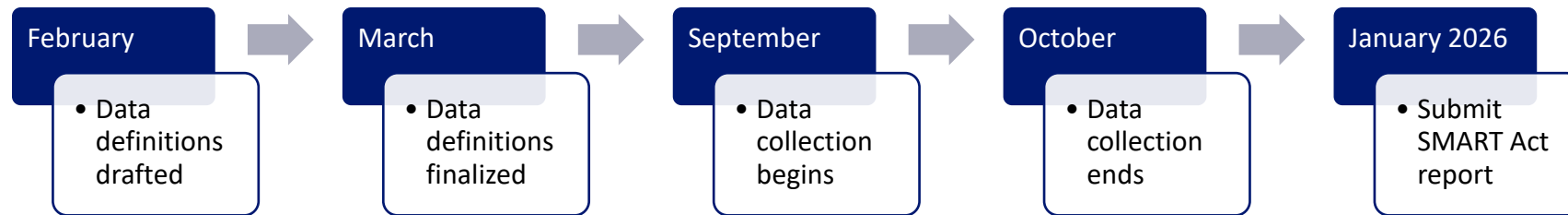


# Key Elements/Mandated Actions:

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

- Same cross-section of registrars, admissions officers, institutional research officers, and academic administrators to operationalize terms and ensure consistent interpretation across institutions
- Working group met on 11/21/24; 12/11/24; scheduled to meet again on 01/08/25
- Additional clarifications to be sought from COAG

# Timeline - SMART Act Reporting



# Key Elements/Mandated Actions:

*Requires creating an appeals process at CDHE specifically related to guaranteed transfer pathways matrix courses with statutory enforcement action (with rulemaking following the Administrative Procedures Act)*

Page 8, Section 2, 23-1-108.5(8)(d) reads:

- A STUDENT ENROLLED AT AN INSTITUTION MAY APPEAL AN INSTITUTION'S DECISION REGARDING THE DENIAL OF CREDIT FOR COURSES IN THE GUARANTEED TRANSFER PATHWAY MATRIX THAT THE STUDENT SEEKS TO TRANSFER THROUGH AN APPEALS PROCESS ESTABLISHED BY THE DEPARTMENT.

# Proposed Student Appeals Process

**1**

Student exhausts all appeals with institution

**2**

Student files a formal complaint with CDHE

**3**

Student and institution provide all required documentation

# Proposed Student Appeals Process

CDHE



Student

Institution

# Proposed Student Appeals Process

**4**

Student appeals  
subcommittee  
meets to review  
and make  
recommendation

**5**

Subcommittee  
provides  
recommendation  
to larger GE  
Council, CDHE staff

**6**

CDHE staff  
makes final  
decision

# Enforcement Action

Page 8, Section 2, 23-1-108.5(8)(a) reads THE DEPARTMENT HAS EXCLUSIVE AUTHORITY TO BRING AN ENFORCEMENT ACTION ON BEHALF OF THE STATE AGAINST AN INSTITUTION FOR A VIOLATION OF THIS SECTION.

**The Department can bring enforcement action for any violations of §23-1-108.5.**



# What is rulemaking?

- Rules are created to enhance statute when needed
- Intended to be as minimum and general as possible
- Process involves Secretary of State's Office, Department of Regulatory Agencies (DORA), and Colorado Office of the Attorney General (COAG)
- Department Legislative Liaison informs Gov's Office of intent to participate in rulemaking in November each year

# Summary

GE Council expansion complete

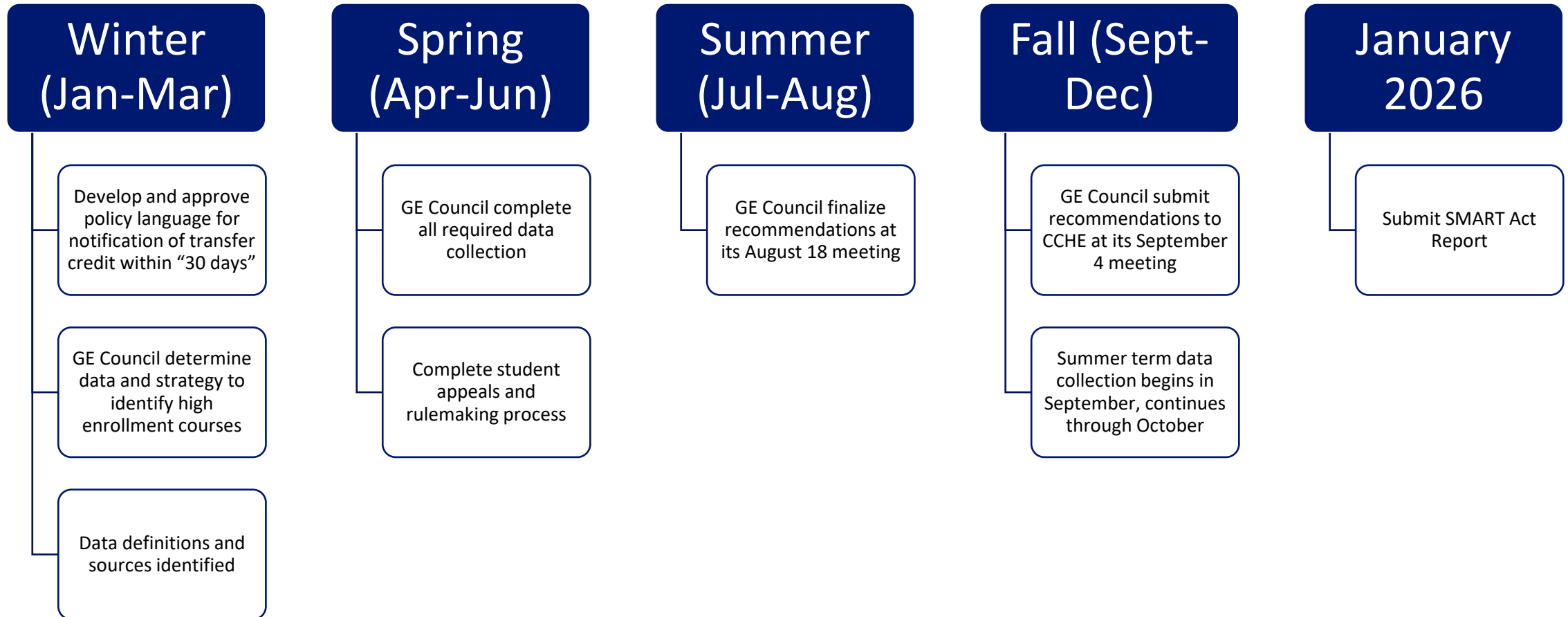
Work to improve transfer within GT Pathways underway

Policy for transfer admission notification to be approved by CCHE by March 7, 2025

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

Student appeals process developed by CDHE by end of academic year

# Timeline - Summary



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**

January 2025

