



CO L O R A D O

**Colorado Commission on
Higher Education**

Department of Higher Education

CCHE AGENDA

May 3, 2024

Virtual Zoom Meeting

BUSINESS MEETING

1:00pm - 4:00pm

1600 Broadway, Suite 2200 • Denver, Colorado 80202 • (303) 862.3001

DR. ANGIE PACCIONE, EXECUTIVE DIRECTOR



COLORADO
Colorado Commission on
Higher Education
Department of Higher Education

Sarah Kendall Hughes, Chair
Jennifer Walmer, Vice Chair
Paul Berrick Abramson
Lisandra Gonzales
Aaron Harber
Teresa Kostenbauer
Steven Meyer
Ana Temu Otting
Eric Tucker
Jim Wilson

Colorado Commission on Higher Education

Friday, May 3, 2024

Virtual

[ZOOM](#)

(Meeting ID: 848 0196 7109 / Passcode: 601811)

11:30 am – 1:00 pm

COMMISSIONER & ADVISOR WORK SESSION

11:30 am – 12:30 pm Overview of Strada Education Foundation's new State Opportunity Index Report - *Nichole Torpey-Saboe, PhD, - Vice President of Research, Strada Education Foundation*

12:30 pm – 1:00 pm Lunch Break

1:00 – 4:00pm

BUSINESS MEETING

- I. **Opening Business (30 minutes)**
 - A. Attendance
 - B. Approval of the Minutes for the April 5, 2024 Commission Meeting
 - C. Reports
 1. Chair
 2. Vice Chair
 3. Commission Standing Committees
 - a. Student Success & Workforce Alignment
 - b. Finance, Performance & Accountability
 - c. HB22-1349 Technical Workgroup Update
 - d. Transfer Ad Hoc Subcommittee
 4. Commissioners
 - a. Commissioner Temu Otting - COSI
 5. Advisors
 - D. Executive Director Report

Governor Jared Polis Dr. Angie Paccione, Executive Director

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- E. Public Comment

- II. Discussion Items (45 minutes)**
 - A. Legislative Update

- III. Consent Items (5 minutes)**
 - A. Approval of Revisions to CCHE Policy, Section I, Part J, Degree Authorization Act – *Heather DeLange, Director Office of Private Postsecondary Education*
 - B. Resolution to Endorse the Colorado GenEd Foundational Skills Credential – *Allana Farley, Credential Pathways Coordinator*

- IV. Action Items (15 minutes)**
 - A. Approval to Continue the CCHE Innovation Policy Pilot Program by Colorado Community College System Institutions and Colorado Mountain College to Award Financial Aid to Concurrent Enrollment Students – *Carl Einhaus, Senior Director of Student Affairs & P20 Alignment and DeAnna Castañeda, Lead Finance Analyst*
 - B. 2024-2025 CCHE Chair/Vice Chair Election – *Executive Director Paccione*





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Minutes of the Colorado Commission on Higher Education (CCHE) Meeting Virtual April 5, 2024

BUSINESS MEETING

Chair Hughes called the business meeting to order at 1:00 pm.

I. Opening Business

A. Attendance

Commissioners attending: Chair Hughes, Commissioners Abramson, Gonzales, Harber, Kostenbauer, Meyer, Temu-Otting, Tucker, and Walmer, Executive Director Paccione

Advisors attending: Mark Cavanaugh, Dr. Michael Lightner, Mark Superka, Danielle Ongart, Jamie Viefhaus-Zak, Leilani Domingo, Dr. Melinda Piket-May

B. Approval of the Minutes for the March 1, 2024 Commission Meeting

Commissioner Harber moved to approve the March 1st minutes. Seconded by Commissioner Gonzales. The motion was approved.

C. Reports

1. Chair - Chair Hughes acknowledged the informative presentation from Jason Gauden and The Common Sense Institute titled "Supply and Demand: Diagnosing Colorado's Skills and Attainment Gap." There is a high level of alignment with the work of the Commission and the groundwork that Commissioner Gonzales does with her organization. Chair Hughes went on to share some fond memories, high accolades and gratitude for departing President Tom Stritikus (Fort Lewis) and President Carrie Besnette Hauser (Colorado Mountain College). Chair Hughes thanked everyone that was involved for their collaboration and partnership on the Student Bill of Rights bill and the focus of transfer. She challenged everyone to engage in the conversation around this bill during the legislative update and to highlight how the bill is better and makes for better outcomes for students. She is also looking forward to a rich conversation around the tax credits that are being discussed and how they relate to the transfer work the Commission is focused on.

Chair Hughes mentioned that she would like the next CCHE Work Session to focus on Strata Foundation's new opportunity index. She encouraged the commissioners to review the report prior to the next meeting. Chair Hughes reminded everyone that Commissioners will vote later in the meeting for an Interim Vice Chair. She also mentioned that the Commission will begin taking nominations today for the Chair and Vice Chair positions. Finally, Chair Hughes informed everyone that the CCHE Retreat for 2024 will take place July 24-26 on the Western Colorado University campus.



2. Vice Chair – No Vice Chair report given the position is vacant this month.
3. Commission Standing Committees
 - a. Student Success & Workforce Alignment – Commissioner Abramson reported that this Committee had a short meeting where they discussed how they can lean in on the recommendations for the 1215 Task Force and how this aligns with the Commission’s strategic plan and priorities. This Committee plans to use the CCHE Retreat to identify some things that they want to focus on in the year ahead.
 - b. Finance, Performance & Accountability - Commissioner Tucker reported that this Committee met recently and discussed some of the feedback they received on the various rubrics for capital and IT. They are careful to continue to be in alignment with other agencies so things are consistent for the institutions and duplicate work can be avoided. This Committee also spent some time reviewing the SHEEO report that was proven useful for practices on developing or redeveloping funding formulas.
 - c. HB22-1349 Technical Workgroup Update – Michael Vente reported for this group. He mentioned that they met this past week and had an opportunity to dive a little deeper into the data and what are the components of the minimum threshold equation. Michael shared that this committee also had a presentation from Dr. Allie Bell who talked about the longitudinal data landscape and facilitated an understanding of those best practices.
 - d. Transfer Ad Hoc Subcommittee- Commissioner Abramson – This Committee is on hiatus until after the legislative session.
4. Commissioners.
 - a. **Commissioner Gonzales** shared that she works with civic influencers ages 16-24 who received mentoring and training and compensation to work alongside decision makers and be a voice in the work that impacts them the most. She is exceptionally proud of 3 of those young people who were able to testify in favor of Senate Bill 24-164 that supports transparency requirements. Commissioner Gonzales also reported that she attended a convening in Dallas of thirteen other leading communities in educational improvements and outcomes through the Strive Together Network.
 - b. **Commissioner Kostenbauer** shared that she had an opportunity to visit the University of Colorado – Colorado Springs and the pre-collegiate program. This program starts at 7th grade and welcomes anyone that is first gen military connected or low-income from any district in that area including Pueblo. The program focuses on informed choice and belonging and all wraparound services including parent discussions. She also had an opportunity to join Executive Director Paccione and Commissioner Tucker on a visit to Pikes Peak State College. Highlights from that visit includes their Promise Program and the new medical campus they opened in 2023. Commissioner Kostenbauer mentioned that there was some interesting discussion around accreditation and how in the medical area Oklahoma did away with accreditation. She said they also talked specifically about surgical techs and certificates versus degrees and what the difference in the education might do to data like infection rates. Commissioner Kostenbauer ended



by saying that Colorado is pretty solid, but it is good to be aware of the discussions and changes that are happening.

- c. **Commissioner Tucker** agreed with Commissioner Kostenbauer regarding the visit to Pikes Peak State College. It was a great tour, and they certainly have a focus on equity and may be a model for some of the things we can do from a Commissioner standpoint. Commissioner Tucker also mentioned that they want the Commission to recognize that they do heavily invest in COSI and want to encourage other institutions and organizations to do the same.

5. Advisors

- a. **Advisor Cavanaugh** updated the Commission on the FAFSA situation. He did mention that the FAFSA completion is down about 30% nationally from where it usually is, which means we could be missing a lot of students. This could translate to a large percentage drop in enrollment nationally that some institutions may not survive. Advisor Cavanaugh acknowledges that Colorado may be in a better position because of the emphasis the Department has put on FAFSA completion and the CASFA program. He also spoke briefly about the delay from the US Department of Education for financial transparency reporting. Finally, he shared his concern for losing the staff that are working closely with the FAFSA situation as this will be the same population responsible for the financial transparency reporting and this brings a lot of pressure.
- b. **Advisor Lightner** shared that he working in collaboration with the Heather Delange and the Department of Higher Education as well as colleagues in other Institutions of Higher Education on addressing issues with the state authorization reciprocity agreements.

D. Executive Director Report

Executive Director Paccione began with advising the Commission that the department is in a very deliberate process to determine our fiscal year 2025 legislative agenda. She invited the commissioners to send any ideas they have to contribute via email to Dr. Sophia Laderman by Thursday, May 2nd. Dr. Paccione briefly spoke about the early childhood stipends and scholarships that have gone out. Nearly \$3 million in scholarships and \$3.8 million in stipends that cover ECE 101 and 103. There are still issues around affordability and attainment, but this helps the students tremendously. With these 2 classes students can begin to work in early childhood. Executive Director Paccione also mentioned CO Helps, a collegiate apprenticeship program. The US Department of Labor gave us \$12 million to produce 5,000 apprenticeships in the healthcare industry by June 30, 2024. Dr. Paccione informed the Commission that there will be another FAFSA event on April 8th with the Daniels Fund. She also informed that our state is down 27% for FAFSA completion and, as Advisor Cavanaugh mentioned, 30% nationally. She publicly recognized Colorado Mesa University for really finding creative ways to support their students through the FAFSA issues. Dr. Paccione also commented that the visit to Pikes Peak State College was fantastic! She commended President Lance Bolton for being innovative and doing a wonderful job acquiring funds for great initiatives on Campus. Finally, Dr. Paccione announced that Dr. Kim Poast will be retiring from the department in June. Dr. Poast has been committed to education in Colorado for at least 25 years! The department will surely miss her, but we are also excited for what comes next for her.



E. Public Comment – No public comment

II. Discussion Items

- A. **Legislative Update-** Carla Blanc provided a brief update current bills working their way through the legislative process, including Senate Bill 24-164, Student Bill of Rights bill, which is a Department of Higher Education bill. The group had a robust conversation about this bill and the updates to it and how it affects the students. She also shared that the Senate just got through the long bill, and that is going back to the JBC members to continue considering amendments that were made by their members.
- B. **Vote for Interim Vice Chair** – Chair Hughes explained that we need to vote on a new Vice Chair because Vice Chair Scott moved out of Colorado and had step down from the Commission. There was only one nomination for the Interim Vice Chair position and that was for Commissioner Walmer. Commissioner Harber motioned to elect Commissioner Walmer as the interim Vice Chair. Commissioner Gonzales second the motion, and it was approved by the Commission with no objections. Chair Hughes also reminded Commissioners to send their nominations for Chair and Vice Chair to Renee before Monday, April 29th.

III. Consent Items (None)

IV. Action Items –

- A. Degree Authorization – Approval of the Renewal for Reach University’s Field Experience Authorization – *Heather DeLange, Director of Office of Private Postsecondary Education*

Dr. Chris Rasmussen explained the field experience authorization for Reach University and the requirement for an annual renewal of authorization to continue compliance with Colorado law. Commissioner Harber moved to approve action agenda item IV. A. Seconded by Commissioner Abramson. The motion was approved.

- B. Degree Authorization – Approval of Renewal for Liberty University’s Field Experience - *Heather DeLange, Director of Office of Private Postsecondary Education*

Dr. Chris Rasmussen explained the field experience authorization for Liberty University and the requirement for an annual renewal of authorization to continue compliance with Colorado law. Commissioner Harber moved to approve action agenda item IV. B. Seconded by Commissioner Abramson. The motion was approved.

The meeting was adjourned at 2:33 pm.



TOPIC: DEGREE AUTHORIZATION ACT – PROPOSED REVISIONS TO
CCHE APPROVED POLICY (SECTION I PART J)

PREPARED BY: HEATHER DELANGE, OFFICE OF PRIVATE POSTSECONDARY
EDUCATION

I. SUMMARY

This item recommends approval for an additional authorization type under Degree Authorization Act policy (CCHE policy Section I, Part J).

II. BACKGROUND

The Degree Authorization Act (DAA) outlines the Colorado Department of Higher Education and the Colorado Commission on Higher Education’s jurisdiction over private education programs available to students in the State of Colorado and nationwide. The DAA establishes minimum standards to authorize institutions to operate within the state with the goal of preventing misrepresentation, fraud, and collusion in offering educational programs to students as well as to protect, preserve, foster, and encourage the educational programs offered by private educational institutions which meet generally recognized criteria of quality and effectiveness as determined through voluntary accreditation.

The proposed addition to CCHE policy, Section I, Part J (Attachment A) establishes a new authorization type for out-of-state institutions to seek in order to offer Colorado high school students dual enrollment courses.

III. STAFF ANALYSIS

Under the Degree Authorization Act, private institutions seek authorization as private colleges/universities or as religious training institutions/seminaries. There are differences in the requirements for authorization based on the type of institution and the authorization the institution seeks.

Given the changes in higher education over the years, an institution is no longer limited to the home state in which it is domiciled. Recently, out-of-state institutions have inquired about providing instruction via dual enrollment to students at Colorado high schools. To accommodate the type of instruction and the presence of the institution in Colorado, staff is recommending a new type of authorization for institutions which have created a partnership with a local high school.

Authorization to offer dual enrollment will provide the Department and Commission with some regulatory oversight for those students who partake in courses offered by out-of-state institutions

through local high schools. The oversight ensures that the out-of-state institution is abiding by Colorado statute and policy and helps the overall responsibility of student protection.

IV. STAFF RECOMMENDATIONS

Department staff recommends the approval of the revisions to CCHE Policy Section I, Part J.

STATUTORY AUTHORITY

§23-2-103.1, C.R.S., Commission – department – duties – limitation – reciprocity

(1) The commission shall:

(a) Establish procedures for authorizing, reauthorizing, and revoking the authorization of private colleges and universities and seminaries and religious training institutions in accordance with the provisions of this article, including but not limited to procedures by which an institution may apply for authorization or reauthorization and the procedures the department shall follow in reviewing applications and making recommendations to the commission.

ATTACHMENTS

Attachment A: CCHE Policy Section I, Part J with proposed revisions.



SECTION I

PART J DEGREE AUTHORIZATION ACT: AUTHORIZATION TO OPERATE AS A POSTSECONDARY INSTITUTION OF HIGHER EDUCATION IN COLORADO

1.00 Introduction

The Colorado Commission on Higher Education (Commission) has statutory responsibility for the administration of Title 23, Article 2 of the Colorado Revised Statutes, (amended 2012), which authorizes certain types of institutions to offer degrees or degree credits: (1) accredited private, degree-granting colleges and universities; (2) postsecondary seminaries and religious training institutions; and (3) out-of-state, public institutions with a Colorado presence. Persons or organizations which violate the provisions of the statute are subject to legal penalties.

The Colorado Department of Higher Education (Department) shall administer the statute by seeking information from any entity offering degrees or degree credits to determine the authority of an institution to operate in Colorado under this statute. Criteria are established for each institutional type to offer degrees or credits leading toward a degree.

No private college or university, out-of-state public college or university, or religious training institution or seminary shall operate within the state until authorized by the Commission to do so.

Private colleges and universities, including out-of-state public institutions with a physical presence in Colorado, that enroll the majority of students at the baccalaureate or higher level are required to obtain authorization to operate in Colorado and maintain authorization through criteria and requirements specified throughout this policy and pursuant to §23-2-101, et seq., C.R.S.

2.00 Statutory Authority

The Commission's policy for private colleges or universities, seminaries, or religious training institutions is based on Title 23, Article 2, which states in part:

The general assembly declares that this article is enacted for the general improvement of the educational programs available to the residents of the State of Colorado; to establish high standards for the education of such residents; to prevent misrepresentation, fraud, and collusion in offering such educational programs to the public; to eliminate those practices relative to such programs which are incompatible with the public interest; and to protect, preserve, foster, and encourage the educational programs offered by private educational institutions which meet generally recognized criteria of quality and effectiveness as determined through voluntary accreditation. (§23-2-101, C.R.S.).

3.00 Definitions



- 3.01 “Accrediting agency or accrediting body” means a regional, national, or specialized accrediting body that is recognized by the U.S. Department of Education and awards institutional accreditation. Specialized accreditation is only recognized by the state when a specialized program is offered in a freestanding institution offering programs in that specific discipline exclusively and the accrediting body has the authority to accredit both the institution and the program. Specialized accreditation normally applies to the evaluation of programs, departments, or schools which are part of a total collegiate or other postsecondary institution. The unit accredited may be as large as a college or school within a university or as small as a curriculum within a discipline. Most specialized accrediting agencies review units within a postsecondary institution which is accredited by one of the regional accrediting commissions. However, certain specialized accrediting agencies accredit professional schools and other specialized or vocational or other postsecondary institutions which are free-standing in their operations. Thus, a "specialized" or "programmatic" accrediting agency may also function in the capacity of an "institutional" accrediting agency. In addition, a number of specialized accrediting agencies accredit educational programs within non-educational settings, such as hospitals.
- 3.01.01 “Accredited” means holding institutional accreditation on the basis of an on-site review from a regional or national accrediting body recognized by the U.S. Department of Education.
- 3.01.02 “Accreditation Status” means the institution’s standing with its accrediting agency. For purposes of state authorization, an accreditation status requiring reporting may be considered an adverse action or sanction.
- 3.02 “Adverse Action or Sanction” means an action by an institution’s regional or national accrediting body recognized by the U.S. Department of Education that results in a notice from the accrediting agency of “show cause”, “warning”, or “probation” or the equivalent.
- 3.03 “Alternate enrollment” means the opportunity for a student enrolled in a private college or university that ceases operation to meet the student’s educational objectives through education provided by another authorized private college or university, a community college, an area vocational school, or any other educational arrangement acceptable to the department and the commission.
- 3.04 “Authorization” means the authorization granted to a private college or university or seminary or religious training institution by the commission as provided in this article and the policies adopted pursuant to this article. Authorization is not an endorsement of the institution by either the commission or the department.
- 3.04.01 Authorization types:
- a. Full Authorization



An institution which is institutionally accredited by a regional or national accrediting body recognized by the U.S. Department of Education with a successful on-site review of its Colorado location(s).

b. Provisional Authorization

Institutions, new or new to Colorado, which have been evaluated by Department staff under Commission procedures and authorized by the Commission to enroll students, offer instruction, graduate students, and award degrees under the condition that the institution is continuously seeking and is making satisfactory progress toward accreditation. If an institution remains in provisional authorization status for three years or if the Commission determines that the institution is not making satisfactory progress toward accreditation, the Commission may, at its discretion, continue to extend provisional authorization for a two-year period, recommend probationary authorization, or revoke the institution's authorization.

c. Probationary Authorization

An institution with an adverse action or sanction by its accrediting agency or another governmental agency may be recommended for probationary authorization status by the Department. If probationary authorization status is imposed by the Commission, the institution shall remain in probationary authorization status until such time as the Commission determines, and as verified by the Department, that the adverse action or sanction has been lifted by the accrediting body or governmental agency. If an institution remains in probationary authorization status for three years, the Commission may, at its discretion, continue to extend the probationary authorization or revoke the institution's authorization.

d. Religious Authorization

A bona fide postsecondary seminary or religious training institution, offering only programs which are religious in nature, which is exempt from property taxation under the laws of this state and whose degrees or diplomas have no state recognition; or

e. Authorization for a Place of Business (with no instruction)

An institution that has a place of business within Colorado but offers no instruction in the state must receive formal authorization for a place of business by the Commission. Institutions with authorization for a place of business shall be subject to the



deceptive trade practices provision as found in §23-2-104, C.R.S., and may be exempted from administrative procedures regarding accreditation at the local site and financial integrity.

f. Authorization for Field Placements (with no instruction)

An institution that intends to place more than ten students from the same program at one site to meet a field experience requirement must receive formal authorization for field placements from the Commission. Institutions with authorization for field placements shall be subject to the deceptive trade practices provision as found in §23-2-104, C.R.S., and may be exempted from administrative procedures regarding accreditation at the local site and financial integrity.

g. Authorization for Dual Enrollment

An institution that intends to offer dual enrollment courses to students at a Colorado high school must receive authorization for such instruction from the Commission. Institutions with authorization for dual enrollment instruction shall be subject to the deceptive trade practices provision as found in 23-2-104, C.R.S., and are exempt from administrative procedures regarding accreditation at the local site. The authorization shall be renewed annually.

- 3.05 “Commission” means the Colorado Commission on Higher Education created pursuant to §23-1-102, C.R.S.
- 3.06 “Degree” means a statement, diploma, certificate, or other writing in any language that indicates or represents, or that is intended to indicate or represent, that the person named thereon is learned in or has satisfactorily completed a prescribed course of study in a particular field of endeavor or that the person named thereon has demonstrated proficiency in a field of endeavor as a result of formal preparation or training.
- 3.07 “Degree File” includes all students who have received a certificate, degree, or formal award approved by the Department during the report year. Degrees earned but not conferred during the report period should be included in the following year’s report. The degree file is collected annually for federal and state reporting. A summer degree file is collected for purposes of graduation rate calculations, but these records are reported again in the full year file.
- 3.08 “Department” means the Colorado Department of Higher Education created and existing pursuant to §24-1-114, C.R.S.



- 3.09 “Educator Preparation File” means data relating to the cooperative agreement between the Department and the institutions of higher education that offers an educator preparation program, pursuant to §23-1-121(4)(c), C.R.S. This data includes teacher, principal, administrator, and special education endorsement area programs, as well as any endorsement listed in the Field Definitions in the SURDS database.
- 3.10 “Enrollment Agreement” means the contract prepared by a private college or university or seminary or religious training institution that a student signs to indicate agreement to the terms of admission, delivery of instruction, and monetary terms as outlined in the institution’s student handbook or catalog. This definition also applies to electronic enrollment agreements.
- 3.11 “Enrollment File” includes all students enrolled in courses awarding credit toward a degree or other formal award and students enrolled in courses that are part of a vocational or occupational program, including those enrolled in off campus centers and high school students taking college-level courses for credit. The population reported is not limited to students whose credit hours are included in official FTE reports. The enrollment file is collected every semester from each public postsecondary education institution participating in SURDS.
- 3.12 “Field Experience” means a student learning experience comprised primarily of the practical application of previously studied theories and skills, under the oversight of a supervisor, mentor, faculty member or other qualified professional, located in the host state, who has direct or indirect reporting responsibility to the institution where the student is enrolled whether or not credit is granted. The field experience is part of a program of study offered by the enrolling institution. Examples include student teaching, clinical placements or internships.
- 3.13 “Financial Aid File” means complete data regarding all student financial aid awards for a fiscal year, if the institution participates in the Colorado student aid program. This includes all enrolled students with a FAFSA on file who applied for or received aid:
- All students who submit an application for student aid maintained in the institution’s financial aid files, or who receive financial support from the institution and who are accepted for enrollment for one or more specific academic periods and enroll in the institution should be included.
- Student aid includes all need-based aid, non-need-based aid, merit awards, loans, and any other forms of aid included in the Financial Aid File Data Dictionary. All students who received any form of aid that came through the financial aid office are to be included, whether or not the applicant applied for need-based aid.
- 3.14 “Governing board” means the elected or appointed group of persons that oversees and controls a private college or university or a seminary or religious training institution.



- 3.15 “Out-of-state public institution” means an institution of higher education that is established by statute in a state other than Colorado.
- 3.16 “Owner” means:
- a. An individual, if a private, for-profit college or university is structured as a sole proprietorship;
 - b. Partners, if a private, for-profit college or university is structured as a partnership;
 - c. Members in a limited liability company, if a private, for-profit college or university is structured as a limited liability company; or
 - d. Shareholders in a corporation that hold a controlling interest, if a private, for-profit college or university is structured as a corporation.
- 3.17 “Physical presence”
- a. For the purpose of state authorization, an institution has physical presence and therefore must seek authorization to operate in Colorado if the institution:
 1. Establishes a physical location for students to receive synchronous or asynchronous instruction;
 2. Requires students to physically meet in a location for instructional purposes more than twice per full-term (quarter or semester) course for a total of more than six hours;
 3. Establishes an administrative office in the state;
 4. Provides information to students for the purpose of enrolling students, or provides student support services, from a physical site operated by or on behalf of the institution in the state;
 5. Offers a “short course” that requires more than 20 contact hours in one six-month period;
 6. Provides office space to instructional or non-instructional staff;
 7. Maintains a mailing address or phone exchange in the state;
 8. Carries out field study or field research located at a field station, research station or other physical site at which a faculty member or other institutional employee or contractor supervises or otherwise directs two or more students in an activity exceeding the allowable short course length and which either bears academic credit or is a requirement for the course or program.
 - b. An institution does not have physical presence, and is therefore not required to seek formal authorization if the institution does not meet the requirements for physical presence if the institution’s actions are limited to the following:
 1. Offering courses to individuals via distance learning that do not require students to gather physically in groups;



2. Offering Consortia/cooperative courses, between accredited institutions with intentional cooperative agreements;
 3. Advertising to students within a state, whether through print, billboard, direct mail, internet, radio, television, or other medium. **An institution that is seeking authorization to operate in Colorado shall not market or advertise prospective Colorado-based programs in- or outside-of Colorado until and unless the Commission grants authorization;**
 4. Offering an educational field trip arranged for a group of students that are normally in residence at an institution in another state;
 5. An accredited, out-of-state institution offering “in-house” courses, programs, and training exclusively and specifically for a private company or group is not required to seek authorization from the Commission but should notify the Department of its activity to avoid any regulatory misunderstanding;
 6. Offering distance education courses on a military base or vessel if enrollment in such courses is limited to active and reserve military personnel, their dependents, and civilian employees of the installation;
 7. Maintaining a server, router or similar electronic service device when such a device is not housed in a facility that would otherwise constitute a physical presence; the presence of a server or similar pass-through switching device in a state does not by itself constitute the offering of a course or program from the state;
 8. Having faculty, adjunct faculty, mentors, tutors, recruiters, or other academic administrative personnel residing in the state. The presence of instructional faculty in the state, when those faculty offer entirely online or other distance-education instruction and never meet their students in person for educational purposes while in the state, does not establish a physical presence of the institution in the state;
 9. Holding proctored exams in Colorado on behalf of an institution in another state;
 10. Operating limited supervised field experiences. Programs requiring a field experience may place up to ten students per site per program. More than ten students placed at the same site from the same program require authorization (see section 18.00);
 11. Using recruiters in the state. This provision is not intended to restrict recruiting for courses or programs offered out of state and does not include athletic recruiting.
- 3.18 “Private college or university” means a postsecondary educational institution doing business or maintaining a place of business in the state of Colorado, which enrolls the majority of its students in a baccalaureate or postgraduate degree program. For the purposes of determining eligibility for participation as a Degree Authorization Act institution pursuant to this section, an institution offering certificates comprised of credit-bearing courses at the upper division baccalaureate or at the graduate level will be considered a private college or university.



- 3.19 “Private nonprofit college or university” means a private college or university that maintains tax-exempt status pursuant to 26 U.S.C. sec. 501(c)(3).
- 3.20 “Private occupational school” means an institution authorized by the private occupational school division under the provisions of article 64 of title 23, C.R.S., and that enrolls the majority of students at the certificate or associate level and is regulated by the Division of Private Occupational Schools pursuant to article 64 of title 23, C.R.S.
- 3.21 “Seminary or religious training institution” means a bona fide religious postsecondary educational institution that is operating or maintaining a place of business in the state of Colorado, that is exempt from property taxation under the laws of this state, and that offers baccalaureate, master’s, or doctoral degrees or diplomas, the content of which are limited to the principles of the church or denomination with which it is affiliated. These institutions are not required to hold institutional accreditation but are not prohibited from seeking accreditation. Seminaries and religious training institutions are prohibited from offering or awarding degrees appropriate only for academic institutions, including but not limited to, Bachelor of Arts or Bachelor of Science, Master of Arts or Master of Science, Doctor of Philosophy or other degrees typically offered by academic institutions, regardless of curriculum or course content, unless the degree title includes the religious field of study (e.g. Bachelor of Arts in Religious Studies); or degrees associated with specific professional fields or endeavors not clearly and directly related to religious studies or occupations. Any seminary or religious training institution that offers instruction outside of this area must apply for authorization and must hold institutional accreditation from regional or national accrediting body recognized by the U.S. Department of Education.
- 3.22 “State Authorization Reciprocity Agreement” means the interstate reciprocity agreement adopted by the Commission under which eligible Colorado institutions may apply for participation, thereby agreeing to the regulations as established and published by the National Council for State Authorization Reciprocity Agreements.

4.00 Responsibilities of the Private Colleges and Universities, Seminaries or Religious training institutions

- 4.01 Private colleges or universities, seminaries or religious training institutions are required to:
- 4.01.02 Seek and maintain authorization from the Commission to operate in Colorado pursuant to §23-2-101 et seq., C.R.S. In order to maintain authorization, an institution must:
- a. Seek and maintain institutional accreditation on the basis of an on-site review by a regional or national accrediting body recognized



by the U.S. Department of Education (**private colleges and universities only**);

- b. Provide information and respond to inquiries by the Department and Commission; and
- c. Immediately notify the Department of any information related to any action by the institution's accrediting body concerning the institution's accreditation status, including but not limited to an adverse action or sanction, reaffirmation or loss of accreditation, approval of a request for change, a campus evaluation visit, a focused visit, approval of additional locations, or substantive changes regarding operations and programming;
- d. Demonstrate financial integrity on an annual basis, to include maintaining a composite score of at least 1.5 on its equity, primary reserve, and net income ratios, as required in 34 CFR 668.172 and pursuant to §23-2-103.8, C.R.S., (**private colleges and universities only**);
- e. Annually submit the Enrollment File and Degree File and, if applicable, the Financial Aid File and Educator Preparation File, as described in §23-1-121, C.R.S., pursuant to §23-2-103.1, C.R.S.;
- f. Annually provide a true and complete copy of the institution's current enrollment agreement;
- g. Not make or cause to be made any oral, written, or visual statement or representation that violates section §23-2-104, C.R.S.;
- h. Provide instruction, in accordance with the standards and criteria set by the institution's accrediting body or in accordance with the requirements set forth for seminaries and religious training institutions;
- i. Provide to the Department, within thirty (30) days after an ownership change, any material information concerning the transaction that is requested by the Department;
- j. Comply with all aspects of the Degree Authorization Act; if a private college or university or seminary or religious training institution violates any of the requirements set forth in this section, the Department may recommend to the Commission that the institution's authorization be placed on probationary status or revoked; and
- k. Provide timely submission of fees, pursuant to §23-2-104.5, C.R.S.



4.01.03 Private colleges or universities and seminaries or religious training institutions authorized in Colorado must provide information regarding their authorization type and status to prospective and enrolled students. This information must be reasonably accessible and, at a minimum, must be found in each institution’s official catalog, website and, , enrollment agreement, if applicable. An authorized institution may not use the Commission or the Department as a perceived endorsement. An authorized institution may not state that it is “accredited” by the Commission or Department. Noncompliance with this section may be treated as

an instance of deceptive trade practice in accordance with §23.2.104, C.R.S.

4.01.04 Private colleges and universities that enroll the majority of students at the baccalaureate or higher level are required to seek authorization to operate in Colorado and maintain authorization through criteria and requirements specified throughout this policy and pursuant to §23-2-101, et seq., C.R.S.

4.01.05 Private colleges and universities that enroll the majority of students at the certificate or associate degree level and are occupational in nature shall be regulated by the Division of Private Occupational Schools and the Private Occupational Schools Board pursuant to Article 64 of Title 23, C.R.S.

4.02 Joint Authorization

Under special circumstances, institutions otherwise approved by the Division of Private Occupational Schools (DPOS) that elect to offer baccalaureate degrees, and have received authority to do so by an approved accrediting body, may hold joint authorization between the DPOS and the Commission. In these circumstances, the Division of Private Occupational Schools will remain the primary regulatory body; the Colorado Commission on Higher Education will authorize the institution to offer baccalaureate degrees.

4.02.01 Pursuant to §23-2-101, et seq., C.R.S. if as a result of changes in student enrollment, a private college or university at times meets the definition of a private college or university and should therefore be under the Colorado Commission on Higher Education and the Department of Higher Education, and at other times meets the definition of a private occupational school, and therefore should be regulated by the Division of Private Occupational Schools and the Private Occupational Schools Board, the private college or university is subject to regulation by the entity that is appropriate as of July 1, 2012. If the private college or university



is authorized as of said date, the institution shall be regulated by the same entity for the following three years.

- 4.02.02 If it is found that the institution no longer meets the definition of a private college or university, as defined by Article 64 of Title 23, C.R.S., the institution will have sixty (60) days to file an application to operate under the Private Occupational Schools Board. During the transition, and until the Private Occupational Schools Board takes action on the institution's application, the institution shall remain authorized by the Commission. Fees assessed during this process will be assessed on a case by case

basis. The assessment of fees will consider fees that have been assessed by the current authorizing division.

- 4.02.03 Failure to apply for approval through the Division of Private Occupational Schools within sixty (60) days will subject the institution to the powers and authorities of the Division or Board pursuant to §23-64-101, et seq., C.R.S., and, as necessary, their procedures for closure.

5.00 Responsibilities of the Commission and the Department

5.01 The Commission shall:

- 5.01.01 Establish procedures for Department staff to make recommendations to the Commission.
- 5.01.02 Grant or deny authorizations, renew authorizations, place institutions on probation, and revoke authorizations pursuant to §23-2-103.3, C.R.S., and §23-2-103.4, C.R.S.;
- 5.01.03 Establish the types and amounts of fees that a college or university, seminary or religious training institution shall be assessed as required in §23-2-104.5, C.R.S.; and
- 5.01.04 Establish policies requiring private colleges, universities and seminaries, religious training institutions to submit to the department, upon request, the Enrollment File and Degree File and, if applicable, the Financial Aid File and Educator Preparation File as described in §23-1-121, C.R.S.
- 5.01.05 Direct staff to investigate and report on an institution's status with its accrediting agency(ies), other governmental agency(ies), or any other state in which it operates, if the Commission deems such action to be necessary.

5.02 The Department shall:



- 5.02.01 Recommend that the Commission grant, deny, revoke, place on probation, or renew an authorization to operate a private college or university or seminary or religious training institution;
- 5.02.02 Maintain a list of the private colleges and universities and seminaries and religious training institutions that have authorizations on file with the Department;
- 5.02.03 Respond to requests from institutions and students and provide a timely review of information;
- 5.02.04 Establish and maintain a process in accordance with §23-2-104, C.R.S. and Commission policy I, T, concerning Student Complaints and Appeals; for review and action as appropriate on said complaints or appeal, providing the complaint is based on a claim of deceptive trade practice;
- 5.02.05 Receive and maintain academic records, pursuant to §23-2-103.5, C.R.S., and as described in section 23.01 of this policy. The Department shall permanently retain any student transcripts received;
- 5.02.06 Maintain the privacy protection of student level data submitted to the SURDS database. (See section 6.00 on privacy);
- 5.02.07 Administer a fee invoice to the institutions on an annual basis;
- 5.02.08 Compile the enrollment and program data provided by the institutions
- 5.02.09 Periodically review the applicability of the authorization to ensure compliance pursuant to §23-2-101 et seq. C.R.S.
 - 1. If the data show the institution to be in compliance with this policy, no action is necessary on the part of the institution.
 - 2. If the majority of students enrolled in an institution do not meet the minimum requirements under this policy, Department staff will recommend revocation of authorization under the Commission and will provide the institution with an application for operation under the Division of Private Occupational Schools.
 - 3. If an institution does not apply for approval through the Division of Private Occupational Schools within the sixty (60) day timeframe, a recommendation for revocation of authorization will be made to the Commission.
 - 4. The Commission and Department are not authorized to regulate the operations of, including but not limited to the



content of courses provided by, a private college or university or seminary or religious training institution except to the extent expressly set forth in this policy.

6.00 Data Privacy Statement

The Executive Director and an employee of the Department shall not divulge or make known in any way data for individual students or personnel, except in accordance with

judicial order or as otherwise provided by law. A person who violates this paragraph commits a Class 1 misdemeanor and shall be punished as provided in §18-1.3-501 CRS and shall be removed or dismissed from public service on the grounds of malfeasance in office.

7.00 Interstate Reciprocity

Pursuant to §23-2-103.1(4), the Commission may negotiate and enter into interstate reciprocity agreements with other states if, in the judgment of the Commission, the agreements do not obligate a private college or university or seminary or religious training institution to comply with standards or requirements that exceed the standards and requirements specified in this policy and the agreements will assist in accomplishing the purposes of this policy, unless the institution voluntarily decides to do so.

The participating institution must comply with the criteria in the reciprocity agreement in conjunction with the oversight division of the Department.

7.01 In 2014, the Commission approved entering, on behalf of the State of Colorado and as a member of the Western Interstate Commission for Higher Education, the State Authorization Reciprocity Agreement (SARA).

7.02 The Agreement charges the Department with the responsibility to serve as the State Portal Entity (SPE) and assume responsibility for the administrative, oversight, complaint investigatory, and reporting functions on behalf of Colorado. As a SARA member state, the Department agrees to adopt the participation requirements set forth by the National Council of State Authorization Reciprocity Agreements.

7.03 As a member state and under the participation requirement, the state portal entity reviews Colorado institutions' applications for participation and bears the responsibility of the approval or denial of participation in SARA.

7.04 Institutional Appeals Process

7.04.01 In the event an institution is denied participation in SARA or if a current participant in SARA receives notice of removal from SARA, the institution may appeal the decision by the State Portal Entity to the SARA Appeals Council.



7.04.02 The SARA Appeals Council shall be composed of the Executive Director of the Colorado Department of Higher Education, the Chair of the CCHE Standing Committee for Academic and Student Affairs, and the Academic Council member of the CCHE Advisory Committee.

A. Institutions choosing to appeal must do so based on the following grounds:

1. The State Portal Entity did not follow procedures set forth by the National Council for State Authorization Reciprocity Agreements as outlined in the SARA manual. The appealing institution must provide supporting documentation.
2. The State Portal Entity erroneously denied participation based on the institution's assessed inability to meet the eligibility criteria to participate in SARA, as outlined in the SARA manual. The institution must provide documentation proving it meets the eligibility criteria for SARA participation.

B. Appeals Process

1. Institutions seeking to appeal the removal or denial of participation in SARA must notify the State Portal Entity Contact in writing of the intent to appeal and must do so within five (5) days after receiving the notice of denial or removal. For current participating institutions, if the notice is not received within five (5) days, the State Portal Entity Contact will continue the process to officially remove the institution from SARA by notifying the NC-SARA staff of the institution's decision not to appeal the State Portal Entity decision.
2. Institutions that notify the State Portal Entity Contact of the intent to appeal must submit an official appeal, consisting of a letter stating the reason for appealing and supporting documentation, within seven (7) days after submitting the notice of intent to appeal.
3. Upon receiving the official appeal and supporting documentation, the Appeals Council will offer a decision within thirty (30) days of the receipt of the



official appeal. The Appeals Council may consult with relevant and applicable individuals from the institution, the State Portal Entity Contact, and the SARA Director at WICHE, and may request additional documentation and/or invite the institution to a meeting.

4. Institutions that are successful in appealing the initial decision by the State Portal Entity will be granted initial participation in SARA or will remain

a SARA participating institution. Pursuant to NC-SARA regulations, the institution must pay all SARA related fees prior to final institutional participation or before institutional participation can be renewed.

5. Institutions whose appeals are unsuccessful will be notified of the decision by a member of the SARA Appeals Council. For current SARA participating institutions the State Portal Contact will take immediate action to have the institution removed from the NC-SARA institution list following the notification of the Appeals Council's decision.

6. If an institution's SARA participation expires during the appeals process, it will remain a participating institution until the process is completed.

7. The decision of the Appeals Council is final.

8.00 Seminaries and Religious Training Institutions

8.01 To operate in Colorado, a seminary or religious training institution shall apply for and receive authorization from the Department and establish that it qualifies as a bona fide religious institution and as an institution of postsecondary education, as defined by rules promulgated by the Commission. A bona fide religious institution and an institution of postsecondary education that applies for authorization pursuant to §23-2-103.3 shall pay the fee established according to §23-2-104.5. Nothing in this section shall preclude a seminary or religious training institution from seeking institutional accreditation, but it is not required.

8.02 A seminary or religious training institution shall apply for renewal of authorization every three years to ensure compliance for those institutions authorized under the Authorization as a Seminary or Religious Training Institution.

9.00 Process for Seeking Authorization as a Seminary or Religious Training Institution



9.01 Criteria to Qualify

9.01.01 The statute recognizes only a “bona fide religious postsecondary educational institution” which is “exempt from property taxation under the laws of this state.” Institutions of this type may only offer programs appropriate to a religious institution. 9.01.02 To qualify as a “bona fide religious postsecondary institution,” the seminary or religious training institution must:

- A. Be a nonprofit institution owned, controlled, operated, maintained, or affiliated with a bona fide church or religious denomination, lawfully operating as a nonprofit religious corporation pursuant to Title 7 of the Colorado Revised Statutes.
- B. Limit the educational programs to the principles of the church or denomination with which it is affiliated and grant degrees or diplomas only in areas of study that contain on their face, in the written description of the title of the degree or diploma being conferred, a reference to the theological or religious aspect of the degree’s subject area.
- C. Not offer or award degrees in any secular area of study or degrees appropriate only for academic institutions, such as, but not limited to, Bachelor of Arts or Bachelor of Science, Master of Arts or Master of Science, Doctor of Philosophy, or other degrees typically offered by academic institutions, regardless of curriculum or course content, unless the degree title includes the religious field of study (e.g., “Bachelor of Arts in Religious Studies”); or degrees associated with specific professional fields or endeavors not clearly and directly related to religious studies or occupations.
- D. Require at least a high school diploma or its equivalent for admission into baccalaureate-level programs. For graduate programs, the admission criteria must be commensurate with graduate level institutions.
- E. Not market, offer or grant degrees or diplomas which are represented as being linked to a church or denomination, but which actually are degrees in secular areas of study.
- F. Provide documentation of exemption from property taxation under state law and submit to the Department a copy of the certificate of this exemption for the school’s site and facilities, verified by the Colorado Division of Property Taxation and a letter of determination signed by the Property Tax Administrator, Division of Property Taxation, Colorado Department of Local Affairs, stating that the institution is exempt from real and personal



property taxation under state law. If the institution is domiciled in another state, the property taxation exemption documentation from that state is acceptable.

- G. Provide any additional evidence to substantiate that the institution is a bona fide religious institution, including: a statement of institutional mission clearly establishing the mission of the institution as solely religious, and curricula and degree, diploma, or

certification programs that clearly support that singular mission; or evidence that the school holds at least pre-accreditation status with one of the following nationally recognized accrediting associations:

1. Association for Biblical Higher Education, Commission on Accreditation; or
2. The Association of Advanced Rabbinical and Talmudic Schools; or
3. Commission on Accrediting of the Association of Theological Schools.

10.00 Process to Establish Authorization as a Seminary or Religious Training Institution

- 10.01 An institution seeking authorization as a bona fide religious institution shall submit to the Department a completed and signed Declaration for Religious Authorization, and document compliance with all requirements in the Declaration, and shall provide a revised Declaration at any time that information originally submitted no longer is accurate.
- 10.02 The first step in obtaining state authorization and prior to the submission of required documentation, institutions seeking to operate in Colorado as a seminary or religious training institution shall consult in person at the Department with the administrator of the Degree Authorization Act.
- 10.03 Following the consultation and review of all documents submitted, the Department shall determine if the institution qualifies for authorization as a seminary or religious training institution.

11.00 Evaluation of Application for Authorization as a Seminary or Religious Training Institution

- 11.01 Following the submittal of the required documents, the Department shall review the application for required components and documents and make a recommendation to the Commission regarding authorization.
- 11.02 The Department shall either:
- Recommend for Seminary or Religious Training Authorization



- Not Recommend Authorization

12.00 Renewal of Authorization for Seminaries and Religious Training Institutions

12.01 A seminary or religious training institution shall apply for renewal of authorization every three years. The renewal of authorization process shall demonstrate that the seminary or religious training institution continues to meet the minimum operating standards specified in this policy and §23-2-103.8, C.R.S.

Failure to do so will result in an assumption that the minimum standards are not met and a recommendation for revocation of authorization will be made.

12.02 A seminary or religious training institution that continues to meet the minimum operating standards specified in 9.01 is presumed qualified for renewal of authorization, and the Department shall recommend that the Commission renew the seminary or religious training institution's authorization for three additional years.

12.02.01 A seminary or religious training institution shall provide the Department for renewal:

- a. Updated list of program offerings; and
- b. Confirmation of non-profit religious corporation status; and
- c. Confirmation of affiliation with bona fide church or religious organization; and
- d. Confirmation of tax-exempt status pursuant to Colorado State Law; and
- e. Updated institutional organization information.

12.03 A seminary or religious training institution that meets the criteria and rules established herein is exempt from the provisions of this policy that exclusively apply to the secular private colleges and universities authorized by the Commission.

12.04 If a seminary or religious institution does not renew its authorization within four (4) months of notice, the Department may recommend and the Commission may, at its discretion, continue to authorize, place on probationary authorization, or revoke the institution's authorization.

13.00 Private Colleges and Universities/Out-of-State Public Institutions

13.01 Pursuant to §23-2-103.3, C.R.S., to operate in Colorado, a private college or university shall apply for and receive authorization from the Commission. A private college or university shall obtain separate authorization for each campus, branch, or site that is separately accredited.



- 13.02 After receiving an application, the Department shall review the application and any other pertinent information to evaluate whether the private college or university meets institutional accreditation requirements at the Colorado site by an accrediting body recognized by the United States Department of Education. Department staff shall not accept an application from an institution that is not in good standing with its accreditor.
- 13.03 The Department shall not recommend and the Commission shall not approve an application from a private college or university that, in the two years preceding submission of the application, has had its accreditation placed on show cause or probation, suspended or withdrawn, or has been prohibited from operating in another state or that has substantially the same owners, governing board, or principal officers as a private college or university that, in the two years preceding submission of the application, has had its accreditation suspended or withdrawn or has been prohibited from operating in another state.
- 13.04 To operate in Colorado, a private college or university shall be institutionally accredited on the basis of an on-site review by an accrediting body recognized by the United States Department of Education which is authorized to offer institutional accreditation; except that a private college or university may operate for an initial period without accreditation if the commission determines, that the private college or university is likely to become accredited in a reasonable amount of time or is making progress toward accreditation in accordance with the accrediting body's policies.
- 13.05 The Commission may grant a provisional authorization to a private college or university to operate for an initial period without accreditation. The private college or university shall annually renew its provisional authorization and report annually to the Commission concerning the institution's progress in obtaining accreditation.
- 13.06 A private college or university shall notify the Department in a timely manner of any material information related to an action by the institution's accrediting body concerning the institution's accreditation status, including but not limited to reaffirmation or loss of accreditation, approval of a request for change, a campus evaluation visit, a focused visit, or approval of additional locations. In addition, the institution shall notify the Department in a timely manner if the United States Department of Education no longer recognizes the institution's accrediting body. Failure to provide this information shall lead to revocation or probationary authorization by the Commission.

14.00 Minimum Operating Standards to Qualify as a Private College or University

- 14.01 A private college or university is an institution which is “doing business or maintaining a place of business in the state of Colorado” and which offers courses



of instruction or study wherein credits may be earned toward a degree in a field of endeavor. A publicly-supported college or university based in another state and which seeks or has physical presence in the state of Colorado will be treated as a “private college or university.”

14.02 All institutions must meet the following criteria to qualify for consideration of authorization and renewal of authorization:

1. Demonstrated ability to provide appropriate student services at the new site through the application materials; and
2. Demonstrated financial ability to support all operations at the new site through the application materials; and
3. Demonstrated physical presence in Colorado with the appropriate documentation.

15.00 Process for Authorization/Renewal of Authorization for Private Colleges and Universities:

15.01 Process to Establish Authorization as a Private College or University

- A. Institutions seeking state authorization to operate in Colorado as a private college or university shall consult in person at the Department with the administrator of the Degree Authorization Act prior to the submission of required documentation.
- B. The applicant shall submit all required materials to the Department and Department staff will assemble an evaluation team to review the materials submitted. The evaluation team is charged with determining whether the materials provided demonstrate compliance with the Degree Authorization Act, promulgated policy, and the likelihood of accreditation.
- C. To receive state authorization an institution must provide documentation that demonstrates that each of the following criteria has been met:
 1. The institution is familiar with and understands accreditation procedures and state authorization policies and procedures; and
 2. (a) The institution identifies the accrediting body from which the institution will seek accreditation if accreditation is not yet obtained; or, (b) A statement from the institution’s accrediting agency regarding the accreditation of the Colorado campus.
 3. The institution has a mission statement formally adopted by its governing body and made public, which defines the basic character of



the institution, including a brief description of the educational programs to be offered and their purposes, the students for which the programs are intended, the geographical or demographic area served by the institution, and a description of how the institution relates to Colorado's broader higher education community. The mission shall be appropriate to an institution of higher education and the institution must plan to award degrees.

5. The institution has a governing board that possesses and exercises necessary legal power to establish and review basic policies that govern

the institution and shall have designated an executive officer to provide administrative leadership for the institution. The board shall include among its members some who represent the public interest and are sufficiently autonomous from the administration and ownership to assure the integrity of the institution. A list of the members of the board, and a brief resume for each, and the name and title of the executive officer and principal administrators and the address of the administrative office shall be submitted to the Department.

6. If faculty members are employed at the time the application is filed with the department, the faculty, their academic credentials (degrees, previous experience, publications, etc.) and teaching fields shall be identified. If no faculty are employed at the time of application, the institution shall describe the qualifications of the faculty that are to be recruited and the procedures that will be used to find and contract with faculty members.
7. Private institutions shall provide ownership information. If the institution is applying as a nonprofit entity, it shall submit with its application, verification of nonprofit status, including a copy of the institution's tax-exempt certificate issued by the Colorado Department of Revenue.
8. The institution's proposed academic programs shall be appropriately named and be based on fields of study recognized as appropriate (as demonstrated by the existence of professional literature in the field; the offering of similar programs in already-accredited institutions; and by the existence of professional organizations related to the field) for a postsecondary institution. The academic program shall comport with the institutional mission as described in documents provided to the department. The institution shall provide a list of the degrees it proposes to award and a degree (as defined in the Degree Authorization Act, §23-1-101 et seq., C.R.S.) is to be awarded upon successful completion of an educational program.



9. The content and length of the proposed academic program shall follow practices common to institutions of higher education and must align with accreditation standards. Documentation shall be provided that lists all requirements for a degree and the curricula offered leading to the degree, showing planned typical student programs by semester or term. Any proposed undergraduate degree program shall include a coherent general education component that is consistent with the institution's mission and appropriate to its educational programs.

10. Student access to all necessary learning resources and support services shall be provided. Necessary resources and support services vary by

type of program, but all require some use of library resources. Laboratories may be required for some programs. Support services such as academic advising, financial aid counseling, and support for special, targeted, constituencies may be needed. The institution shall describe the learning resources and support services that it will provide and state how they will be provided to students on a regular, dependable basis.

11. Admission policies shall be consistent with the institution's mission and appropriate to the educational program.

12. The institution has financial resources to support start-up activities and sources of funds sufficient to ensure that the institution can sustain itself once students have been admitted. The Department shall be provided with a current financial statement, an audit report of a financial audit completed within the previous twelve months by a certified public accountant, or other substantial evidence.

D. After an institution has submitted all required documentation and based on the institution's selected accrediting body, the Department shall contract with an evaluation team to review all submitted materials to determine the institution's readiness for on-site accreditation and make a recommendation regarding authorization.

15.02 Joint Authorization under Special Circumstances

15.02.01 In the special instance that a school authorized by the Division of Private Occupational Schools offers baccalaureate degree programs but does not meet the majority rule pursuant to §23-64-104(d)(II), C.R.S., the Commission shall have authority to authorize the baccalaureate and higher level programs at the school pursuant to the Degree Authorization Act, §23-2-101, et seq., C.R.S. However, under such circumstances, the school will be required to follow DPOS rules and statutes until such time that the



majority of the institution's programs are at the baccalaureate level or higher.

15.02.02 Under the special circumstances, as stated in 4.02, department staff will address complaints received by students enrolled in the baccalaureate and higher degree programs pursuant to the process outlined in section 14.01.

a. In the event that the department receives complaints by students enrolled at both the sub-baccalaureate and baccalaureate levels, department staff may coordinate the review of these complaints and include all relevant information

in recommendations for board action, whether the information is being provided to the DPOS board, the Commission, or both.

16.00 Evaluation of Application for Authorization for Private Colleges and Universities

16.01 Following the submission of the required documents and based on the institution's selected accrediting body, the Department shall review the application for required components and documents, the Department shall contract with an evaluation team to review all submitted materials to determine the institution's readiness for on-site accreditation and make a recommendation regarding authorization.

16.02 Based on the recommendation of the evaluation team, the Department staff shall recommend:

- Provisional Authorization
- No Authorization

16.03 Each evaluation team will consist of several appropriate independent and fully credentialed evaluators selected by Department staff, based on institution type and the accrediting body from which the applicant shall seek accreditation.

16.04 In addition to the required documents, additional materials may be requested by the evaluation team and/or department staff based on the criteria established by the accreditation association.

16.05 If the evaluation team does not recommend the applicant institution for state authorization, the applicant institution may not reapply for a period of one year from the date of notice and the application fee will be assessed upon reapplication. If the evaluation team recommends a conditional approval based on minor technical changes, the applicant institution will have six months to reapply and the Department will not assess another application fee.

17.00 Establishing Authorization as a Place of Business (no instruction)



- 17.01 An institution of higher education that is accredited by a U.S. Department of Education recognized accrediting agency may operate an administrative office but may not offer instruction from the Colorado site.
- 17.02 Criteria to qualify for consideration of Authorization as a Place of Business. Institutions seeking this authorization must provide:
- a. Institutional statement, signed by an institutionally authorized official, which:
 1. Certifies the institution intends to limit Colorado operations to the administrative office function only;
 2. Certifies the institution does not have or intend to have a physical presence in the state beyond the administrative office, which can include a branch campus or any additional site that provides instruction to students;
 3. Agrees to report the number of Colorado students on a yearly basis through Colorado’s student unit record data system (SURDS);
 4. Agrees to pay an annual fee pursuant to the CCHE approved fee schedule; and
 5. Certifies the truth and accuracy of the application materials, by including the following statement: “I certify that all the information submitted with this application is true and accurate and that the institution will comply with all the requirements for authorization under §23-2-101, et seq., C.R.S.”
 - b. Statement of Institutional Mission
 - c. Information on degrees and academic programs
 - d. A statement on why the institution is choosing Colorado for an administrative office.
 - e. Statement of accreditation status, including:
 1. Most recent site visit report
 2. Determination letter from accrediting agency
 - f. Description of all activities that will occur at the Colorado office
 - g. Application fee
 - h. Initial authorization checklist
 - i. Completed Regulation Determination

18.00 Establishing Field Experience Authorization (no instruction)

- 18.01 An institution of higher education that is accredited by a U.S. Department of Education recognized accrediting agency may place students in field experience sites but may not offer instruction from the Colorado site.



18.02 Criteria to qualify for consideration Field Experience Authorization. Institutions seeking this authorization must provide:

- a. Institutional statement, signed by an institutionally authorized official, which:
 1. Certifies the institution intends to limit Colorado operations to the field experience function only;
 2. Certifies the institution does not have or intend to have a physical presence in the state beyond the student(s) completing their required practical component;
 3. Agrees to limit student placement for the approved program(s);
 4. Agrees to pay the approval fee pursuant to the CCHE approved fee schedule; and
 5. Certifies the truth and accuracy of the application materials, by including the following statement: “I certify that all the information submitted with this application is true and accurate and that the institution will comply with all the requirements for authorization under §23-2-101, et seq., C.R.S.”
- b. Information on the degrees that require field placements, including those programs which are intended to result in licensure. If the program leads to licensure, the institution must provide a statement regarding the requirements for students not living in the home state.
- c. A letter of good standing from the institution’s home state.

19.00 Establishing Dual Enrollment Authorization

19.01 An institution of higher education that is accredited by a U.S. Department of Education recognized accrediting agency may provide instruction to students at a Colorado high school.

19.02 Criteria for consideration of Dual Enrollment authorization

Institutions seeking this authorization must provide:

- a. Initial authorization checklist
- b. Completed regulation determination
- c. Institutional statement, signed by an institutionally authorized official, which:
 - i. Certifies the institution intends to limit instruction and any other activity to this designated high school
 - ii. Certifies the institution does not have or intend to have a physical presence in Colorado beyond the instructional activity at the designated high school which includes any additional site that provides instruction to students



- iii. Agrees to report the number of Colorado students on a yearly basis through Colorado’s student unit record data system (SURDS)
- iv. Agrees to pay an annual fee pursuant to the CCHE approved fee schedule, and
- v. A letter of good standing from the relevant authorizing agency in the institution’s home state
- d. Statement of institutional mission
- e. A list of courses and, if applicable, the degree or credential programs for which the institution is seeking authorization to offer dual enrollment instruction
- f. A statement on why the institution is choosing the high school in Colorado to offer dual enrollment instruction
- g. Statement of accreditation status, including any required follow up actions from the most recent reaffirmation/renewal cycle, and
- h. Application fee

20.00 Renewal of Authorization for Private Colleges and Universities with “Full Authorization”

20.01 A fully authorized private college or university shall apply for renewal of authorization in accordance with the schedule for institutional reaccreditation by its accrediting body or every three years, whichever is longer.

20.02 Required documents for renewal of authorization:

- a. Self-evaluation report or similar
- b. Accreditation site visit team’s report
- c. Institution’s response to site visit report
- d. Final determination letter from the accrediting body

21.00 Renewal of Authorization for Private Colleges and Universities with “Provisional Authorization”

21.01 Private colleges and universities that hold provisional authorization shall renew authorization annually. If after three years the institution has not achieved accreditation, the Commission may grant a two-year extension if the institution requests the extension, provides documentation demonstrating satisfactory progress toward accreditation and has maintained continuous compliance.

21.02 Required documents:

- a. Any and all communications to and from the accrediting body from which the institution is seeking accreditation, including all documents regarding progression towards the institution’s progress toward attaining accreditation;



- b. Accreditation progress report from the accrediting agency;
- c. Status report of institution's activities;
- d. Updated enrollment information;
- e. Enrollment agreements, if applicable, and any other recruitment materials used for training staff and presented to potential students;
- f. Updated list of faculty, including faculty credentials and the courses they teach;
- g. Updated list of programs offered at the Colorado site;
- h. Updated bond information.

22.00 Renewal of Authorization for Private Colleges and Universities with “Probationary Authorization”

21.01 Private colleges and universities that have been placed on probation by the Commission shall annually renew such authorization with the Commission until such time the Commission determines to restore full authorization status or revoke the institution's authorization to operate.

21.01.02 Required documents for institutions with probationary authorization:

- a. Accreditation status update, identifying progress regarding the adverse action issued by the accrediting body or other governmental agency;
- b. Any and all communication regarding the adverse action issued by the accrediting body or other governmental agency;
- c. Prospective timeframe for when the adverse action is expected to be acted upon.

23.00 Renewal of Authorization – All Authorized Institutions

22.01 A private college or university that has authorization from the Commission pursuant to §23-2-103.3, C.R.S., and maintains its accreditation shall apply to the Department for renewal of authorization in accordance with the schedule for reaccreditation by its accrediting body or every three years, whichever is longer. A seminary or religious training institution shall apply for renewal of authorization every three years. A private college or university or seminary or religious training institution that seeks renewal of authorization shall submit an application in accordance with the procedures and policies adopted by the

Commission and shall pay the renewal of reauthorization fee established by the Commission pursuant to §23-2-104.5, C.R.S.



- 23.02 To renew its authorization to operate in Colorado, a private college or university or seminary or religious training institution shall demonstrate that it continues to meet all minimum operating standards specified in the Degree Authorization Act, specifically §23-2-103.8, C.R.S., and this policy. Failure to demonstrate compliance with the minimum operating standards will result in a presumption that the minimum operating standards are not met and the Commission, at its discretion, may place the institution on probationary authorization or revoke authorization.
- 23.03 A private college or university that has had its accreditation reaffirmed without adverse action is in compliance with §23-2-103.8, C.R.S., and is not subject to investigation pursuant to §23-2-103.4, C.R.S., is presumed qualified for renewal of authorization, and the Department shall recommend renewal for a period of three years or the length of the institution’s accreditation, if applicable, whichever is longer.
- 23.04 A seminary or religious training institution that continues to meet the minimum operating standards is presumed qualified for renewal of authorization, and the Department shall recommend that the Commission renew the institution’s authorization for three additional years.
- 23.05 If a private college or university or seminary or religious training institution cannot demonstrate that it meets the minimum operating standards specified in Commission policy or pursuant to §23-2-103.3 or §23-2-103.8, if applicable, the Department shall recommend that the Commission deny the institution’s application for renewal of the authorization.
- 23.06 If, within six months after receiving the notice of denial of the application for renewal, the institution corrects the action or condition that resulted in denial of the application for renewal, the institution may reapply for renewal of the authorization.
- 23.07 If the institution does not correct the action or condition within the six month period, it may submit a new application for authorization after correcting the action or condition.
- 23.08 If a private college or university has received an adverse action or sanction from its accrediting body at the time it files for an application for renewal of authorization to operate in Colorado, the Department may recommend that the Commission renew the institution’s authorization or that the Commission grant a probationary renewal of the institution’s authorization.
- 23.09 If an institution receives a probationary renewal of its authorization, the institution shall reapply for renewal of its authorization annually until the accrediting body lifts the adverse action, and the institution shall annually report to the Commission concerning the institution’s progress in removing the adverse action.
- 23.10 If the Department recommends that the Commission grant a probationary renewal of authorization or deny an application for renewal of authorization, the



Commission shall notify the private college or university or seminary or religious training institution concerning the recommendation, and the Department and the Commission shall proceed in accordance with the provisions of the “State Administrative Procedures Act”, Article 4 of Title 24, C.R.S.

24.00 Change of Authorization Type - Probationary Status or Revocation

- 24.01 If the Commission has reason to believe that a private college or university or seminary or religious training institution meets one or more of the grounds specified in the following section for probationary authorization status or revocation of authorization, the Commission may order the Department to investigate the private college or university or seminary or religious training institution and make a recommendation concerning whether to place the institution on probationary authorization status or revoke the institution’s authorization.
- 24.02 To assist the Department in conducting an investigation pursuant to §23-2-103.4 (1), C.R.S., the Commission may subpoena any persons, books, records, or documents pertaining to the investigation, require answers in writing, under oath, to questions the Commission or Department may ask, and administer an oath or affirmation to any person in connection with the investigation. In conducting the investigation, the Department may physically inspect an institution’s facilities and records. A subpoena issued by the Commission pursuant to this paragraph is enforceable by any court of record in the state.
- 24.03 Based on findings of an investigation pursuant to this section, the Department shall make a recommendation to the Commission regarding the institution’s authorization status.
- 24.04 If the Department recommends probationary authorization status or revocation of authorization, it shall identify the applicable grounds for specified below, and the Department and the Commission shall proceed in accordance with the provisions of the “State Administrative Procedures Act,” Article 4 of Title 24, C.R.S.
- 24.05 With regard to the authorization of a private college or university, the Commission may:
- 24.05.01 Revoke the private college’s or university’s authorization or place the institution on probationary authorization status if the private college or university:
 - a. Fails to meet any of the minimum standards set forth in this policy or in statute;



- b. Fails to substantially comply with the applicable laws or rules adopted or implemented by other governmental agencies that have jurisdiction over the institution; or
- c. Violates the federal criminal laws or the criminal laws of this state or any other state in which the institution operates;
- d. Loses accreditation, is placed on probation by, or receives an adverse action or sanction from its accrediting agency; or
- e. Is accredited by an accrediting agency that the U.S. Department of Education no longer recognizes.

24.06 The Commission may revoke a seminary's or religious training institution's authorization or place the institution on probationary status if the seminary or religious training institution:

- a. No longer meets the definition of a seminary or religious training institution specified in §23-2-102, C.R.S.;
- b. Fails to meet any of the minimum standards set forth in statute or in the Commission's policy or rule adopted to implement the statute; or
- c. Violates the federal criminal laws or the criminal laws of this state or any other state in which the institution operates.

25.00 Fee Schedule

Pursuant to §23-2-104.5, C.R.S., the Commission has the authority to establish fees for direct and indirect costs of administering the Degree Authorization Act. After initial determination of fees, fees will be established on an annual basis no later than June 30 of the year preceding implementation. The Department and Commission shall give thirty (30) days for comment unless no changes are made to the fee structure. The fee shall reflect the direct and indirect costs of administering the article. Fees shall include, but not be limited to, application fees, authorization/annual fees, renewal of authorization fees, educator preparation fees (if applicable), and gtPathways review fees (if applicable).

26.00 Deposit of Records upon Discontinuance

26.01 Pursuant to §23-2-103.5, C.R.S., if an authorized private college or university or seminary or religious training institution ceases operating in the state, the owner of the institution or his or her designee shall deposit with the department the original or legible true copies of all educational records of the institution. If the Commission determines that the records of an authorized institution are in danger of being destroyed, secreted, mislaid, or otherwise made unavailable to the Department, the Commission may seek a court order authorizing the Department to seize and take possession of the records.



26.02 The Department or the Attorney General may enforce the provisions of this section by filing a request for an injunction with a court competent jurisdiction. A person may request, in accordance with the provisions of the Colorado Open Records Act, Part 2 of Article 72 of Title 24, C.R.S., a copy of a record held by the Department pursuant to this section. The Department shall permanently retain any student transcript. The Department shall retain any other records received for ten years following the date on which it receives or obtains the records. After the ten years, the Department shall dispose of the records in a manner that will adequately protect the privacy of personal information included in the records.

27.00 Procedure for the Closure of an Institution

27.01 In the event an institution closes and ceases operations, the owner or designee is required to provide timely notification, with as much advanced notice as is possible, to the Department and currently enrolled or recruited students in writing immediately of the intention to close/cease operation.

27.02 Written notification the Department to close or cease operations must include:

- a. Name of the institution;
- b. Name of the owner, active mailing address, and telephone number where he or she may be reached after the institution physically closes;
- c. Name of the institution's Chief Executive Officer, President, or other appropriate administrator;
- d. Date of closure (or approximate of anticipated closing date);
- e. A list, with contact information, of all affected students including, a report of the status of all students currently enrolled and those students on leave of absence whose education and training program will not be fully completed by the date of the institution's closure;
- f. Identify in writing whether there are refunds due to any students;
- g. Submit a written statement from the owner or designee affirming that all recruitment efforts, program marketing, advertisement (regardless of type, i.e. newspaper, website, television broadcast, etc.), solicitation and enrollment of new students has ceased;
- h. A copy of the written notice given to current students or recruited-but-not-yet-enrolled students informing them of the school's intent to close and copies of any other record of students having been so notified; and
- i. The expected deposit date of the student records to the Department.

27.03 Student Records must include:



- a. The individual enrollment agreement and other instruments relating to the payment for educational services, including student financial aid; and
- b. Academic grades and attendance (when in doubt preserve it; seek technical assistance from the Department; or turn it over to the Department to make a final determination); and
- c. The date the student began instruction at the school and information about each program in which the student is or was enrolled, including (a) the name of program, (b) length of program in clock hours or credit hours and (c) date of last instruction or of course completion; and
- d. Record of any student grievance and subsequent resolution; and
- e. Transcript/record of completion showing extent of each student's record of achievement up to last date attended or up to time the institution ceased operation; and
- f. Student ledger cards. The student ledger card is the document that summarizes the financial transactions pertaining to each student's attendance at the institution including a listing of all costs charged to the student and all fees received from the student or any other funding source on behalf of the student.

28.00 Alternative Enrollment

An option for students faced with a closure is to continue their education in order to complete their program. Alternative enrollment may be provided, under which (1) either the students complete their studies at the original private college or university in which they are enrolled, before it closes or (2) arrangements are made and students are given an opportunity to complete their education at another private, Commission authorized school which offers substantially the same education.

Alternative enrollment is intended to fulfill the original contract between the closing institution and the student. If alternative enrollment is arranged for another approved institution to provide the remaining education that other institution must provide comparable education and agree that students transferring from the closing institution will pay only the cost of tuition/fees that remain unpaid, according to the terms and conditions found in the enrollment agreement entered into between the student and the closing institution.

The Department will work with the closing institution and its accrediting body to determine if alternative enrollments can be made available. The option of alternative enrollment is voluntary and a student may decline such an arrangement.

29.00 Financial Integrity – Surety



- 29.01 Pursuant to §23-2-103.8, C.R.S., the Department shall determine the financial integrity of private colleges or universities except when the private college or university:
- a. Is a party to a performance contract with the Commission under §23-5-129, C.R.S.;
 - b. Has been accredited for at least twenty years by an accrediting agency that is recognized by the United States Department of Education;
 - c. Has operated continuously in this state for at least twenty years; and
 - d. Has not at any time filed for bankruptcy protection pursuant to Title 11 of the United States Code.
- 282902 If a private college or institution does not meet the criteria above, the Department shall determine the institution's financial integrity by confirming that the institution meets or does not meet the following criteria:
- 29.02.01 The institution has been accredited for at least ten years by an accrediting agency that is recognized by the United States Department of Education;
 - 29.02.02 The institution has operated continuously in this state for at least ten years;
 - 29.02.03 During its existence, the institution has not filed for bankruptcy protection pursuant to Title 11 of the United States Code;
 - 29.02.04 The institution maintains a composite score of at least 1.5 on its equity, primary reserve, and net income ratios, as required in 34 CFR 668.172; and
 - 29.02.05 The institution meets or exceeds the pro rata refund policies required by the federal Department of Education in 34 CFR 668 or, if the institution does not participate in federal financial aid programs, the institution's refund and termination procedures comply with the requirement of the institution's accrediting body.
- 29.03 If a private college or institution is part of a group of private colleges and universities that are owned and operated by a common owner, so long as all of the other institutions in the group meet the criteria specified above then the Department shall determine the institution's financial integrity by confirming that the institution meets the following criteria:
- 29.03.01 The institution has received and maintains full accreditation without adverse action from an accrediting agency that is recognized by the United States Department of Education, which



accrediting agency requires the institution to maintain surety or an escrow account or has affirmatively waived or otherwise removed the requirement for the institution;

- 29.03.02 The institution has been continuously authorized by the Commission for at least five years:
- a. The institution owns and operates a permanent instructional facility in the state;
 - b. The institution annually provides to the Department audited financial statements for the most recent fiscal year that demonstrate that the institution maintains positive equity and profitability;
 - c. The institution maintains a composite score of at least 1.5 on its equity, primary reserve, and net income ratios, as required in 34 CFR 668.172; and
 - d. The institution meets or exceeds the pro rata refund policies required by the federal Department of Education in 34 CFR 668 or, if the institution does not participate in federal financial aid programs, the institution's refund and termination procedures comply with the requirements of the institution's accrediting body.

29.04 Surety

Each private college or university that is not exempt and cannot demonstrate financial integrity shall file evidence of surety in the amount calculated by the Department using the criteria above prior to receiving authorization to operate in Colorado. The surety may be in the form of a savings account, deposit, or certificate of deposit that meets the requirements of §11-35-101, C.R.S., or an alternative method approved by the Commission, or by bond. The Commission may disapprove an institution's surety if it finds there are insufficient funds to provide students with indemnification and alternative enrollment.

29.05 Bonds

- 29.05.01 If a private college or university files a bond, it shall be executed by the institution as principal and by a surety company authorized to do business in Colorado. The bond shall be continuous unless the surety is released as set forth in this section.
- 29.05.02 The surety shall be conditioned to provide indemnification to any student that the Department finds to have suffered loss of tuition or any fees as a result of any act or practice that is a violation of the



Degree Authorization Act, to provide alternate enrollment, as described below, for students enrolled in an institution that ceases operation, and to reimburse the Department for any actual administrative costs associated with an institution ceasing operation.

29.05.03 The amount of the surety that a private college or university submits is the greater of five thousand dollars or an amount equal to a reasonable estimate of the maximum prepaid, unearned tuition and fees of the institution for the period or term during the applicable academic year for which programs of instruction are offered, including but not limited to programs offered on a semester, quarter, monthly, or class basis, except that the institution shall use the period or term of greatest duration and expense in determining this amount if the institution's academic year consists of one or more periods or terms. The private college or university shall recalculate the amount of the surety annually.

29.05.04 The Colorado Commission on Higher Education may consider alternative surety requirements for institutions that can demonstrate that existing surety covers students served by the institution operating subject to authorization by the Colorado Commission on Higher Education.

29.06 Claims of Loss of Tuition and Fees

A student, or parent or guardian of the student, who claims loss of tuition or fees, may file a claim with the Department if the claim results from an act or practice that violates a provision of this policy. Claims filed with the Department are public records except that the Department shall not make the claims records public if the release would violate a federal privacy law. The Department shall not consider a claim that is filed more than two years after the date the student discontinues his or her enrollment with the institution.

29.07 Ceasing Operation and Alternate Enrollment

If a private college or university ceases operation, the Commission may make demand on the surety of the institution and the holder of the surety upon the demand for a refund by a student or the implementation of alternate enrollment and may make demand on the surety to reimburse the Department for actual administrative costs associated with the institution ceasing operation. In such case, the holder of the surety or, if the surety is a bond, the principal on the bond shall pay the claim due in a timely manner. To the extent practicable, the Commission shall use the amount of the surety to provide alternate enrollment through a contract with another authorized private college or university, a community college, an area vocational school, or any other arrangement that is



acceptable to the Department. The alternate enrollment provided to a student shall replace the original enrollment agreement, if any, except that the student shall make the tuition and fee payments as required by the original enrollment agreement, if any.

Any amount of the surety that is greater than the amount necessary to satisfy costs to provide alternate enrollment for the student and any demand for a refund by a student may be retained by the Department as reimbursement up to the amount of any actual administrative costs incurred by the Department that are associated with the closure.

29.08 Payment of Debt

A student who is enrolled in a private college or university that ceases operation and who declines alternate enrollment may file a claim with the Commission for the student's prorated share of the prepaid unearned tuition and fees that the student paid. The Commission shall not make a subsequent payment to a student unless the student submits proof of satisfaction of any prior debt in accordance with this policy. If the amount of the surety is less than the total prepaid, unearned tuition and fees that have been paid by students at the time the institution ceases operation, the Department shall prorate the amount of the surety among the students. This section applies only to students enrolled in the institution at the time it ceases operation. Once an institution ceases operation, no new students shall be enrolled. The Commission is the trustee for all prepaid, unearned tuition and fees, student loans, Pell grants, and other student financial aid assistance if an authorized private college or university ceases operation.

29.09 Claims That Do Not Involve Ceasing Operation

For claims made that do not involve a private college or university that ceases operation, the Commission shall conduct a hearing to determine whether there is loss of tuition or fees, and, if the Commission finds that claim is valid, it shall make demand upon the surety.

29.10 Suspending Authorization Based on Loss of Surety

29.10.01 A private college's or university's authorization is suspended by operation of law when surety as required by this policy no longer covers the institution. The Department shall give written notice to the institution at the last-known address at least forty-five days before the release of the surety. Authorization is suspended by operation of law until the institution files evidence of surety in like amount as the surety being released.

29.10.02 The principal on a bond filed under the provisions of this section is released from the bond after the principal serves written notice thereof to the Commission at least sixty days before the release.



The release does not discharge or otherwise affect a claim filed by a student or enrollee or his or her parent or legal guardian for loss of tuition or fees that occurred while the bond was in effect or that occurred under any note or contract executed during any period of time when the bond was in effect, except when another bond is filed in a like amount and provides indemnification for any such loss.

- 29.10.03 Each private college or university that files a surety shall provide annual verification of continued coverage by surety in a report to the Commission due by January 1 of each year. If a private college or university that is exempt from the provisions of this policy or that demonstrates financial integrity ceases to operate in this state, the State Attorney General may file a claim against the institution on behalf of students enrolled at the time the institution ceases operation to recover any amount of unearned, prepaid tuition that may be owed to the students. A seminary or religious training institution is not subject to the requirements of this section.

30.00 Data Submission

Refer to SURDS data submission guidelines,

31.00 Student Complaints

Refer to CCHE policy I, T; concerning Student Complaints.

**TOPIC: RESOLUTION TO ENDORSE THE COLORADO GENED
FOUNDATIONAL SKILLS CREDENTIAL**

PREPARED BY: ALLANA FARLEY, CREDENTIAL PATHWAYS COORDINATOR

I. SUMMARY

This item presents for discussion and potential action a Commission resolution to endorse and encourage adoption of the *Colorado GenEd Foundational Skills Credential*.

II. BACKGROUND

The *Colorado GenEd Foundational Skills Credential* is a formal recognition of an undergraduate student's completion of all GT Pathways requirements at a Colorado public college or university. GT Pathways, or Guaranteed Transfer Pathways, is a 31-credit general education core in 6 different content areas that builds student competencies in civic engagement, creative thinking, critical thinking, diversity and global learning, information literacy, inquiry and analysis, problem solving, quantitative literacy, and written communication. The GT Pathways program was launched in 2002 in response to 2001 legislation directing the Commission to address challenges in student transfer by adopting a statewide common course numbering matrix for general education.

Public colleges and universities in Colorado align select lower-division courses with the content and competencies in GT Pathways to facilitate student transfer and degree completion, such that GT Pathways is part of the student experience across most associate of arts, associate of science, and bachelor's degree programs. The same 2001 legislation created a council of higher education representatives, known as the General Education Council (or GE Council), to develop and oversee the initiative.

The *Colorado GenEd Foundational Skills Credential* is a mechanism to formally recognize students when they have fulfilled all GT Pathways requirements, which rewards them for achieving a significant milestone in their degree pathways and highlights the in-demand skills and competencies that are developed through general education—competencies that employers indicate again and again are foundation for workplace success.

III. STAFF ANALYSIS

Discussion of the need to formally recognize the significance of completing all general education requirements began in 2019 but was postponed, like many initiatives in progress, due to the Covid-19 pandemic. Ironically, Covid accelerated many existing trends in higher education, including a demand for shorter-term credentials to meet immediate job training needs, and growing doubts about the general value of higher education and the economic returns of a bachelor's degree, themes that were woven through the final report of the HB21-1330 taskforce.

Additionally, a national movement has emerged to better recognize student achievement on the way to a degree, both to reward student progress and to validate their career-connected learning.

In 2021 and 2022, the Department engaged in two initiatives to encourage institutions to develop shorter-term credentials on the way to a bachelor's degree, or that could stack into a bachelor's degree while functioning as standalone vehicles for workplace advancement. The first of these initiatives is *Credential As You Go*, a multi-state demonstration project funded by the U.S. Department of Education's Institute of Education Sciences. The second is SB22-192, *Opportunities for Credential Attainment*, which directed Department staff to work with institutions to develop stackable credential pathways in five different industries. Out of these efforts emerged a renewed focus on the role and value of general education in preparing students for advanced study in a specific major or academic discipline, as well as preparation for career through the timeless, foundational skills that are developed through the general education curriculum. Related to this work, the Commission approved changes to its academic programs policy (Section I, Part V) in June 2023 to clarify that all institutions are allowed to offer certain sub-baccalaureate credentials, including certificates that can be applied to one or more degree programs.

In August 2023, Department staff convened a General Education Credential Task Force to develop a framework for a completion award using the GT Pathways competency matrix. The resulting framework and recommendations were endorsed by the General Education Council at its January 8, 2024 meeting.

IV. STAFF RECOMMENDATION

This item is presented for discussion, but on recommendation could be moved for immediate action. If moved to action, staff recommend that the Commission approve the Resolution to Endorse the *Colorado GenEd Foundational Skills Credential*.

V. STATUTORY AUTHORITY

This item does not represent a policy or other action requiring statutory authority.

VI. ATTACHMENTS

Attachment A: Proposed Resolution to Endorse the Colorado GenEd Foundational Skills Credential

Attachment B: Colorado GenEd Completion Credential Proposal

Colorado Commission on Higher Education
Resolution to Endorse the Colorado GenEd Foundational Skills Credential

Approved May 3, 2024

WHEREAS, the General Education Council is the statutory entity established in 2001 to develop and oversee Colorado's statewide general education transfer framework, known as Guaranteed Transfer Pathways, or GT Pathways; and

WHEREAS, GT Pathways is a 31-credit general education core in 6 different content areas that builds student competencies in civic engagement, creative thinking, critical thinking, diversity and global learning, information literacy, inquiry and analysis, problem solving, quantitative literacy, and written communication; and

WHEREAS, these competencies are regularly identified by employers as being in-demand and critical for success in the workplace, and by faculty as foundational for upper-division study and completion of a degree; and

WHEREAS, public colleges and universities in Colorado align select lower-division courses with the content and competencies in GT Pathways to facilitate student transfer and degree completion, making GT Pathways a part of the student experience across most associate of arts, associate of science, and bachelor's degree programs; and

WHEREAS, a national movement exists to better recognize student achievement on the way to a degree, both to reward student progress and to validate their career-connected learning; and

WHEREAS, at its June 2023 meeting, the Colorado Commission on Higher Education approved changes to its academic programs policy (Section I, Part V) to clarify that all institutions are allowed to offer certain sub-baccalaureate credentials, including certificates that can be applied to one or more bachelor's degree programs; and

WHEREAS, on January 8, 2024, the General Education Council endorsed a framework developed by a cross-institutional task force that provides guidance to institutions of higher education to offer a general education completion credential, awarded after fulfillment of all GT Pathways requirements, which rewards students for achieving a significant milestone and promotes the in-demand skills and competencies developed through general education;

BE IT RESOLVED that the Colorado Commission on Higher Education recognizes and thanks the General Education Council and the General Education Completion Taskforce for their work in developing the *Colorado GenEd Foundational Skills Credential* framework; and

BE IT FURTHER RESOLVED that the Colorado Commission on Higher Education encourages all public colleges and universities to develop aligned general education completion credentials and to communicate to students the value of the knowledge, skills, and competencies developed through general education.

Colorado General Education Credentialing Task Force Mission Statement

The Colorado General Education Credentialing Task Force aims to highlight, reinforce, and apply the value of Colorado higher education institutions' general education program by packaging it into quality academic micro-credentials, including digital micro-credentials. It recognizes that skills and competencies gained through Colorado's general education program are directly and broadly applicable and are in increasingly high demand. This credentialing initiative addresses the following objectives:

1. Provide guidance for Colorado higher education institutions to create and implement GE credentials
2. Facilitate portability and transferability among higher education institutions
3. Highlight the nature and value of Colorado's general education program
4. Support students, employers, and other constituents in understanding and articulating skills and competencies gained through Colorado's general education program as well as their value and application
5. Provide evidence of attainment of broadly applicable skills and competencies
6. Recognize early career and foundational academic achievements that promote student persistence, retention, and completion
7. Offer additional stackability toward two- and four-year degrees and encourage advanced study of foundational skills

Why should institutions adopt such credentials?

A "foundational skills certificate" or other recognition of completion of general education requirements will allow students to celebrate milestones in their educational trajectory by earning a meaningful accomplishment on the way to an associate and/or bachelor's degree. Packaged below the size of an associate degree, the foundational skills certificate or other credential may be completed in as little as one academic year. The credits from this certificate or other credential will likewise serve to encourage student persistence and stackability toward higher degrees, owing to the inclusion of GT Pathways courses. The inclusion of GT Pathways courses will likewise allow for maximum transferability as well as ease of transferability between institutions.

Why would employers find value in such a credential?

On the career front, employers struggle to quantify the value and relevance of "some college" as well as in some cases the potential relevance of certain degrees at the associate and bachelor's level. At the same time, they value the skills developed through a liberal arts or general education curriculum: communication, critical thinking, creativity, literacy, adaptability, interpersonal skills, and empathy. Packaging and presenting such a curriculum as foundational skills will provide employers with the means to assess the difference between a seemingly random assortment of completed courses and the sort of coursework that contributes to a well-rounded employee possessing basic communication and quantitative literacy skills, among other competencies. Additionally, a foundational skills certificate or other credential will allow students to signal their basic intellectual competency and workforce readiness beyond the level of a high school diploma, thereby contributing to their hireability and preparation for today's rapidly changing workforce.

General Education Credential Framework

- Title: Colorado Collegiate GenEd Credential (CCGC) -- potentially to be trademarked
- Alternative Titles considered:
 - GT Pathways Completion Recognition (using the term “completion” signals that gen ed requirements are complete/finished--no additional courses required)
 - GT Pathways Completion Award (decided to keep “GT Pathways” out of the title because the term has limited meaning outside of Colorado’s public colleges and universities)
 - Colorado Foundational Skills Award
 - Colorado’s Foundational Skills Completion Award
- Credits: 31 (completion of all GT Pathways requirements or aligned 31-credit completion)
- This credit-bearing sub-baccalaureate credential recognizes foundational competencies in the following broadly applicable skill areas:
 - Written communication
 - Quantitative literacy
 - Problem solving
 - Inquiry and analysis
 - Critical thinking
- Requirements that align with statewide GT Pathways requirements:
 - 6 credits (2 courses) of written communication (GT-CO 1-3)
 - 3 credits of math (GT-MA1)
 - 7 credits (2 courses) in the natural sciences, including at least one course with a lab (GT-SC 1-2)
 - 6 credits (2 courses) in the arts and humanities (GT-AH 1-4)
 - 3 credits of history (GT-HI1)
 - 3 credits in the social and behavioral sciences (GT-SS 1-3)
 - 3 additional credits in history, the arts and humanities, or the social and behavioral sciences

Frequently Asked Questions

Q: Why is the Colorado Collegiate GenEd Credential needed? How is it valuable?

A: The Colorado Collegiate GenEd Credential (CCGE, or CoGeC) signifies to students, family members, and employers that an individual has completed courses designed to develop key foundational competencies and skills in written communication, quantitative literacy, problem solving, inquiry and analysis, and critical thinking. These skills are regularly identified by employers as key to success in the workplace (for example, see [The Career-Ready Graduate: What Employers Say About the Difference College Makes](#)). The credential also signals to students that they have achieved a key milestone in the completion of their larger academic goals and affirms the return on the investment they have made in completing the general education curriculum.

Q: Does my institution need to participate?

A: Decisions about which academic credentials to award and when to award them are the prerogative of individual institutions. As such, institutions are strongly encouraged, but not required, to participate.

Q: Can my institution implement a general education completion award that differs from these requirements?

A: The CCGC is designed to be awarded to students who have completed all GT Pathways requirements. Recognizing that some institutions require additional general education courses that go above and beyond GT Pathways, and institutions may require students to meet the institution's full general education requirements before issuing the award. That being said, keeping the credential simple, identifiable, and consistent across institutions will benefit students across institutions and provide increased credibility to employers and other stakeholders.

Q: If a student transfers after receiving this award, can the receiving institution require additional coursework to meet general education requirements (such as with some institutions' diversity requirements)?

A: Ideally, a student who completes the Colorado Collegiate GenEd Credential at one institution should fulfill all general education requirements statewide and not be required to complete any additional courses post-transfer—similar to students who complete a Degree with Designation (DwD). However, until such time that this expectation is codified into Commission on Higher Education policy, institutions may require incoming transfer students to take additional required courses that are outside of the statewide GT Pathways program.

Q: Must the credential be added to the student's academic transcript?

A: Ideally, the CCGC would appear on the academic transcript similar to other academic credentials including degrees, certificates, minors, and areas of concentration. Transcribing the credential gives it legitimacy and a cachet that is greater than awards and recognitions that are not transcribed. Appearance on the transcript also communicates authenticity and validity to employers and others who might require academic transcripts for hiring or admission. Institutions that decide not to transcribe the award (and those that do) might provide students with comparable collateral such as electronic notification or a printed document of recognition.

Q: Must the credential be awarded to students at the time it is completed?

A: The credential has maximum value to students if it is awarded when it is earned – that is, at the time when all course requirements have been completed. By doing so, institutions signal progress toward the

degree in the short term and provide an opportunity for students to communicate the value of their efforts to employers before completion of a larger degree program. In an ideal scenario, institutions would award the credential as one of several stackable credentials building to an associate or bachelor's degree.

Q: Why should (or why shouldn't) we call this a "certificate"?

A: Each institution defines "certificate" differently, in some cases reserving use of the term for credentials that fall below a certain number of credits. The term "certificate" might be reserved for credentials that are connected to career and technical programs or that are reported to the U.S. Department of Higher Education or to SURDS. Some institutions may prefer to avoid potential policy implications, including being subject to federal Gainful Employment regulations, that could follow the awarding of a "certificate." In response to these concerns, the proposed name of the award includes the more generic term "credential" (but nothing prevents an individual institution from calling the award a "certificate").

Q: How should my institution administer this credential? Where should it be housed?

A: Recognizing institutional variability, the location and administrative logistics for this credential is up to the discretion of individual institutions.

Q: Is this a financial aid-eligible award?

A: Provided the student has declared an academic program that includes general education requirements, the completion award should be aid-eligible; that being said, each institution defines financial aid eligibility for programs and students depending on their accreditation approvals and Title IV Participation Agreement with the U.S. Department of Education. (Note: High school concurrent students are not eligible for state or federal financial aid.)

Q: How will we brand and promote the award?

A: The Colorado Department of Higher Education will partner with institutions to develop a branding and outreach strategy, along with selected marketing collateral designed for students to communicate the value of their general education experience and the completion credential to family members and employers. This will include working with a third-party strategy firm using external dollars.

Q: What are the next steps?

A: The General Education Council will endorse the proposed framework at an upcoming meeting. This will be followed by presentation to the Academic Council (provosts and other chief academic officers) with proposed additions to the [CCHE policy on Statewide Transfer and GT Pathways](#) to codify the framework and criteria for the completion award. Institutions would then follow their individual internal curriculum approval processes to create an aligned credential that can be awarded to students as soon as practicable.

TOPIC: RECOMMEND APPROVAL TO CONTINUE THE CCHE INNOVATION POLICY PILOT PROGRAM BY COLORADO COMMUNITY COLLEGE SYSTEM INSTITUTIONS AND COLORADO MOUNTAIN COLLEGE TO AWARD STATE FINANCIAL AID TO CONCURRENT ENROLLMENT STUDENTS

PREPARED BY: CARL EINHAUS, SENIOR DIRECTOR OF STUDENT SUCCESS & P20 ALIGNMENT, AND DEANNA CASTANEDA, LEAD FINANCE ANALYST

I. SUMMARY

This agenda item presents the continuation of a proposed waiver of the Colorado Commission on Higher Education (CCHE) policy to expand the allowable use of state financial aid dollars (through the Colorado Student Grant) to support Concurrent Enrollment (CE) students at Colorado Mountain College (CMC) and institutions within the Colorado Community College System (CCCS). The grant funds were approved to be used by low-income students for CE expenses not covered by the Concurrent Enrollment Program Act (e.g. books, fees, supplies, and transportation). The terms of the waiver are outlined in the attached Memorandum of Understanding with CCCS, CMC, and the Colorado Department of Higher Education (CDHE). The MOU resulted from a rigorous departmental review process following receipt of the innovation proposal in February 2021, subsequent reviews by the Commission’s standing committees for fiscal affairs and student success/academic affairs, and presentation and discussion at the June 3, 2021, meeting of CCHE. If the initiative is approved to continue, an updated MOU will be drafted for CMC and CCCS through the spring 2026 term.

II. BACKGROUND

The CCHE’s [Innovation Policy](#) was created by the Commission in October 2020. The policy “creates an innovation framework for public higher education institutions to seek authorization to engage in CCHE approved experimentations not otherwise authorized in existing CCHE policy, collect data regarding efficacy of the innovation, and advance policy recommendations for future adoption.” The policy also requires that institutions “provide assurances regarding financial implications, compliance with existing federal and state law and governing board policies, and protection of students’ rights and responsibilities.” The intent of this policy is to allow for innovative thought in higher education policy, while accelerating institutions and Colorado toward the shared vision of increasing student success.

In February 2021, the Department received its first policy innovation proposal following publication of associated rules and process. Following a thorough review process and discussion among all parties, an understanding was reached on scope and terms, which is outlined in the attached MOU. The purpose and intent of the proposed innovation, as described in the MOU, is as follows:

A two-year amendment to CCHE policy...to award need-based financial aid to high school students participating in Concurrent Enrollment programs as defined in 22-35-101 (6)(a) C.R.S. This amendment is intended to allow eligible colleges and universities to elect to use a portion of the need-based grant aid they receive from the state to offset direct student costs of enrollment beyond tuition and required fees, to include such items as textbooks, required materials and supplies, and transportation if not onsite.

The intent of the innovation is: To expand concurrent enrollment student access and success, as direct costs for college textbooks and materials are not funded under current law for high school students. This expanded access would specifically target low-income students who remain underrepresented in both Concurrent Enrollment and postsecondary participation.

CCHE approved the innovation proposal in June 2021, and CDHE entered into an MOU with Colorado Mountain College (CMC) and the Colorado Community College System for spring 2022 through the fall 2023 academic terms. CMC and Pueblo Community College (PCC) participated in the initiative. CDHE staff held multiple meetings with IHE personnel involved in the project to learn about their experiences, challenges, and successes. Additionally, the outcome reports submitted by both institutions (attachments) were reviewed by CDHE staff to evaluate future continuance.

Overview of the program:

- 579 students total participated from both institutions, with a total of \$106,220.48 distributed;
- 65 students from 8 school districts participated in CMC's program, with \$11,017.00 total funds distributed; and
- 514 students from 13 different high schools participated in PCC's program, with \$95,203.48 total funds distributed.

Feedback from CMC and PCC regarding the program:

- It removed the financial barrier and increased participation for low-income students;
- Increased marketing and communication regarding the opportunity is needed to grow participation;
- Two years was not enough to implement the initiative with fidelity; and
- Additional operational guidance is requested, particularly on data sharing agreements with local education providers and how to distribute the funds to families.

Quotes from CMC participating students regarding the value of the program:

- "Yes, because it allowed me to feel more comfortable and confident to take the opportunity to take classes and get my degree."
- "If this grant is not upheld and is scrapped for next year. I don't think i would be able to take concurrent enrollment classes."

- “My family is considered low income, so I’m dependent on scholarships and grants to attend college. These classes are in the hundreds range typically and my family would not be able to afford them if it weren’t for this grant.”

III. STAFF ANALYSIS

The proposed innovation was subject to rigorous review and extensive consultation, as outlined above. Improvements to the original proposal include additional specificity regarding measurable goals, specific partners, populations, and estimated financial implications. The proposal does not include additional Department or Commission funding, and no *new* money was or will be received or used during the pilot. The MOU includes a cap of 3% of an institution’s total CSG allocations to be used for Concurrent Enrollment students. Institutions must continue to abide by the Department’s student budget parameters when making awards.

Suggestions for improvements:

- CDHE to provide a reporting template to grant recipients so data is provided in the same manner to aid in outcome analysis and include additional data points including student demographics and credit hours attempted and completed;
- Assist with operational concerns including providing guidance on data sharing agreements and payment processes;
- Support marketing and promotion of the program to eligible students so more can take advantage of the opportunity; and
- Extend the program for additional years so more school districts, families, and students can benefit from the opportunity which can result in an increased CE enrollment statewide especially from students with financial hardship.

IV. STAFF RECOMMENDATIONS

Staff recommend extending this innovation policy with Colorado Mountain College and institutions within the Colorado Community College System through the end of the spring 2026 term. CDHE will draft an updated MOU which will include the suggestions for improvement listed above.

V. STATUTORY AUTHORITY

C.R.S. 23-1-108(1)(a). The commission, after consultation with governing boards of institutions and as a part of the master planning process, shall have the authority to: (a) establish a policy-based and continuing system-wide planning, programming and coordination process to effect the best use of available resources.

ATTACHMENTS:

Attachment A: CMC-CCCS-DHE MOU_ Innovation Policy on Financial Aid for CE Students

Attachment B: Colorado Mountain College Innovative Grant to High School Students Evaluation Report

Attachment C: CSG at PCC



Memorandum of Understanding
between
Colorado Community College System and Colorado Mountain College
and
Colorado Department of Higher Education

I. Background

This Memorandum of Understanding (MOU) is a statement of principles for collaboration between the Colorado Community College System (CCCS), Colorado Mountain College (CMC) and the Colorado Department of Higher Education (CDHE).

CCCS, CMC and CDHE have identified a two-year policy innovation project, as permitted according to Colorado Commission on Higher Education (CCHE) policy Section VII (Policy Innovation).

II. Purpose, Goals and Scope

The purpose of this MOU is to establish a clearly defined partnership between CCCS & CMC with CDHE in the implementation of the policy innovation described in this document.

The policy innovation involves a temporary waiver from existing CCHE policy as follows:

A two-year amendment to CCHE policy Section VI, Part F (State-Funded Student Financial Aid Policy) that creates a framework for CCCS and CMC to award need-based financial aid to high school students participating in Concurrent Enrollment programs as defined in 22-35-101 (6)(a) C.R.S. This amendment is intended to allow eligible colleges and universities to elect to use a portion of the need-based grant aid they receive from the state to offset direct student costs of enrollment beyond tuition and required fees, to include such items as textbooks, required materials and supplies, and transportation if offsite.

The intent of the innovation is:

To expand Concurrent Enrollment student access and success, as direct costs for college textbooks and materials are not funded under current law for high school students. This expanded access would specifically target low-income students who remain underrepresented in both Concurrent Enrollment and post-secondary participation, as



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recognized in the State's Higher Education Master Plan. Funding will come from the institution's Colorado Student Grant allocation.

The primary goals of this program are:

- A. To grow Concurrent Enrollment participation among low-income students (access) that may not have been able to benefit from such courses due to course-related expenses not otherwise covered through the Concurrent Enrollment Programs Act.
- B. To create more equitable postsecondary outcomes within high schools or across schools. Concurrent Enrollment is hugely popular in Colorado, with more than 27% of all students earning college credit in high school (Community College Research Center, 2021). However, access to these courses is not equitable for low-income populations. By allowing colleges to direct existing resources to high need students in high school, participating institutions expect to materially improve the state's goals of college access and completion, while reducing costs to the lowest income students in the K-12 system.

The scope of this program is:

This program covers all CCCS institutions and CMC. Institutions may use up to three percent (3%) of their annual Colorado Student Grant (CSG) allocation to distribute need-based grant aid to school districts, that will, in turn, reimburse eligible students for expenses directly related to Concurrent Enrollment. Eligible expenses include textbooks, mandatory course materials, transportation expenses when a class is not located at the high school, and other personal expenses directly related to participation in a given course. As with all financial aid, this program must operate within the Department's published Student Budget Parameters. This policy is valid from the Spring 2022 through the Fall 2023 academic terms, at which point the CCHE may evaluate whether it wants to make the change permanent and available to other eligible institutions.

By signing this MOU, all parties are committed to a written pledge among the participating parties to implement the program described herein with operational fidelity, consistency with state laws and CCHE policies, administrative transparency, and cooperation.

III. Roles and Responsibilities under this MOU

CCCS and CMC will:

- a. Serve as the entities responsible for organization, implementation, and execution of all operational aspects of the approved innovation.



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- b. Solicit, collect, and report required data regarding progress toward measurable goals and impact of the innovation.
- c. Communicate with the department staff regularly and respond to the department's inquiries when prompted.
- d. Complete and submit semi-annual reports.
- e. Present to department staff or to the Commission as requested on the policy's effectiveness and impact.

CDHE will:

- a. Serve as the supervisory entity, responsible for communicating expectations and collecting submissions of required reports, data, and information from the institutions.
- b. Provide support and serve as liaison to the Colorado Commission on Higher Education.

Participating organizations agree to collaborate, as appropriate considering the scope and purpose of this MOU, to improve outcomes for Colorado communities and Colorado students.

Termination and Continuance:

- a. By signing this MOU, the parties agree to cooperate in good faith, from the Spring 2022 through the Fall 2023 academic terms, to achieve the goals of the policy innovation proposed herein.
- b. This MOU may be terminated at any time, and without payment of any penalty, by CCCS or CMC, upon sixty (60) days' written notice to CDHE. This MOU may not be terminated by CDHE without formal action by CCHE.
- c. If CCCS or CMC terminate their participation in this MOU, the MOU will continue to operate for the remaining party. The entirety of this MOU may only be terminated if both CMC and CCCS provide written notice of termination, as described in paragraph b above.

A. CCCS and CMC Reporting and Deliverables

A mutually agreed upon framework for data collection and reporting is outlined below. At a minimum, CCCS and CMC will report semiannually to the CDHE, outlining the details of their progress toward goals and specific metrics.

CCCS and CMC will:



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- a. Provide semiannual reports no more than 60 days after the end of each semester. These reports will be due after Spring 2022, Fall 2022, Spring 2023, and Fall 2023. At a minimum, the following data points should be collected:
 1. Number of Concurrent Enrollment students receiving awards from each institution
 2. Total awards
 - a. By institution
 - b. By expense category
 3. Average and median awards
 4. Expansion of target population – collect all metrics for Fall 2021 as baseline
 - a. Total number of Concurrent Enrollment students
 - b. Total Concurrent Enrollment credit hours completed
 - c. Number of Concurrent Enrollment students who are on free and reduced lunch
 - d. Percentage of Concurrent Enrollment students who are on free and reduced lunch
 5. Number of participating districts
 6. Describe marketing efforts made to advertise the program to potential Concurrent Enrollment students.
- b. Institutions are strongly encouraged to collect and report additional metrics.
- c. Respond to additional CDHE data requests, as needed including any requests from the Department to present to staff or leadership of the CDHE and CCHE.

IV. Timeline

This policy will begin the Spring term of 2022, with awareness raising allowed during the preceding term of Fall 2021. It will be in effect through the Fall term of 2023.

V. MOU General Terms

It is mutually understood and agreed by and between the parties that:

- a. CCCS, CMC, and CDHE will provide technical assistance services to grantees and cooperate with one another and CDHE to improve the implementation of program objectives
- b. This MOU may be modified by written, mutual MOU of CCCS, CMC, and CDHE only.



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- c. This MOU is effective as of the date signed below and until such time as it may be terminated by CMC and CCCS according to the terms described herein.

- d. The remedy for any breach of this MOU shall be limited to the right to terminate this Memorandum of Understanding if such breach is not cured within 30 days after notice from the non-breaching party. No party shall be liable in damages nor be entitled to any other remedy.



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V. Effective Date and Signatures

For Colorado Community College System (CCCS)

Designated Representative:

By: *Joe Garcia*

Date: November 1, 2021

Name: Joe Garcia
Title: Chancellor, Colorado Community College System
Address: 9101 East Lowry Boulevard, Denver, CO 80230
Phone: 303-595-1552
E-Mail: joe.garcia@cccs.edu

For Colorado Mountain College (CMC)

Designated Representative:

By: *Carrie Besnette Hauser*

Date: November 1, 2021

Name: Carrie Besnette Hauser
Title: President and CEO, Colorado Mountain College
Address: 802 Grand Avenue, Glenwood Springs, CO 81601
Phone: 970-947-8691
E-mail: cbhauser@coloradomtn.edu

For Colorado Department of Higher Education (CDHE)

Designated Representative:

By: *Dr. Angie Paccione*

Date: November 1, 2021

Name: Angie Paccione
Title: Executive Director, Colorado Department of Higher Education



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Address: 1600 Broadway Street, Suite 2200, Denver, CO 80202

Phone: 303-862-3001

E-mail: Angie.Paccione@dhe.state.co.us

Evaluation Report

Innovative Grant to High School Students also known as *Puente Grant*

Colorado Mountain College
Department of Strategic Initiatives
Office of Financial Aid

March 1, 2024

Executive Summary

The CMC Puente Grant is a pilot program for granting financial aid awards to concurrent enrollment students. In 2021, Colorado Mountain College entered into a Memorandum of Understanding between the Colorado Community College System and the Colorado Department of Higher Education for a two-year policy innovation project, as permitted according to Colorado Commission of Higher Education policy Section VII (Policy Innovation). The two-year amendment to CCHHE policy section VK, Part F, created a framework for partner institutions to award need-based financial aid to high school students participating in Concurrent Enrollment programs as defined in 22-35-101 (6) (a) C.R.S. Despite its promising framework, the CMC Puente Grant encountered constraints in scope and impact from its onset. The program primarily provided financial assistance to students enrolled in concurrent enrollment who incurred fees or expenses beyond what was covered by school district funds. However, it had a limited effect on expanding access to new or more diverse student populations. This limitation stemmed from an unclear definition of the cost of attendance budget that could be utilized for concurrent enrollment financial aid, and a lack of clarity on whether need-based aid could be directly disbursed to concurrent enrollment students or their families.

This report contains summary data of the grant awards, insight into whom was awarded and its impact on basic outcomes like course pass rates, GPA, and persistence (expanded optics into these are available in Appendixes attached below). Additionally, surveys were sent to concurrent enrollment coordinators as well as different sub-groups of high school students to understand more about the pilot and the feasibility of the program in the future. Notable findings from quantitative and qualitative sources are highlighted below.

- CMC awarded \$11,017 to 65 distinct students for the pilot program from 22/FA to 23/SP with an average award amount of \$131.15.
- Puente Grant recipients were 25% first-generation and 80% Hispanic/Latino/Latina and primarily connected to CMC Rifle's campus.
- Course level comparisons reveal no meaningful differences in course pass rates or GPAs between Puente recipients and non-recipient Rifle CEPA students.
 - Compared with college-wide CEPA overall Puente grant recipients have lower course pass rates and GPAs in almost every notable academic department. Our focus on future funding will be to purposefully connect students with academic and student success programs.
- 100% of recipients who responded to our survey indicated the program helped them stay enrolled and would be encouraged to enroll more in the future if the program were continued.
- Despite the existing uncertainty regarding the extent of additional funding, both students and CEPA coordinators concur that increased financial support would positively influence access for concurrent enrollment students.
 - Given this perspective, it is advisable to explore enhanced marketing efforts to promote the possibility of expanding the program.

Drawing from our insights and the data collected during the pilot, we propose the following recommendations for enhancing future programs:

- To improve the efficacy of similar initiatives, it is crucial to adopt more efficient data sharing and collection practices. This is particularly important for smaller, rural school districts where such processes can be significantly challenging. Clarification that school districts have the authority to share free and reduced lunch information regarding enrolled concurrent enrollment students with public colleges and universities for purposes of determining eligibility for need-based financial assistance for costs associated with concurrent enrollment would be beneficial.
- To truly leverage this aid in expanding access to the CEPA program statewide, greater effort must be directed towards enhancing how school districts and colleges promote CEPA to prospective students. Special emphasis should be placed on reaching those traditionally excluded from college-preparatory discussions.
- There is a pressing need for clearer guidelines on funding for high school students, encompassing a broader discussion on non-tuition related expenses such as transportation. Clarification on cost of attendance budget for concurrent enrollment students and clarify that need-based aid can be disbursed directly to concurrent enrollment students or families would be truly beneficial.

Data on free-reduced lunch students in CMC's service areas from the state K-12 system (see Appendix 2, Table 6) suggests that economic need is on the rise in our areas. Quantitative analysis suggests that money alone will not be enough to boost educational outcomes for CEPA students. Nonetheless, CMC, the State of Colorado, and local school districts all need to refocus efforts around CEPA to ensure that cost barriers are not prohibitive for some students to start exploring the potential of a college education while in high school. This may require a rethinking of all traditional practices and mindsets around identifying the students who want or are ready to pursue college, how education is marketed to high school students and their families, and how we calculate the cost of concurrent enrollment education for students.

Colorado Mountain College officially requests that the original MOU be extended to another term of one to two years considering the proposed recommendations listed above.

Appendix 1: Quantitative Summary Data

Table 1: Puente Grant Awarding Summary

Row Labels	Students Awarded	Total Awarded
22/FA	16	\$2,165.00
22/SP	11	\$1,166.00
23/FA	34	\$4,279.00
23/SP	23	\$3,407.00
Grand Total	84	\$11,017.00

- There are 65 distinct students awarded, so 84 is illustrating that some students were awarded multiple terms

Table 2: Puente Grant Minimum Award Amounts

Row Labels	Min Award Amount
22/FA	\$40.00
22/SP	\$28.50
23/FA	\$40.00
23/SP	\$40.00
Overall Min	\$28.50

Table 3: Puente Grant Maximum Award Amounts

Row Labels	Max Award Amount
22/FA	\$300.00
22/SP	\$237.50
23/FA	\$300.00
23/SP	\$600.00
Overall Max	\$600.00

Table 4: Puente Grant Average Award Amounts

Row Labels	Average Award Amount
22/FA	\$135.31
22/SP	\$106.00
23/FA	\$125.85
23/SP	\$148.13
Overall Average	\$131.15

Appendix 2: Demographics

Table 5: Breakdowns of the Puente Grant Recipients (n=65)

Row Labels	% of Recipient Cohort
Hispanic	80.00%
F	35.38%
M	44.62%
Unknown	6.15%
F	1.54%
M	4.62%
White	13.85%
F	9.23%
M	4.62%
Grand Total	100.00%

**The cohort is 25% first generation overall

Table 6: School District Free-Reduced Lunch Trends

District	21-22	23-24	% change
Aspen	3.60%	6.20%	2.60%
Eagle	27.30%	39.30%	12.00%
Lake	47.60%	49.50%	1.90%
Garfield 16	60.30%	68.20%	7.90%
Garfield Re-2	*	34.70%	
Roaring Fork RE-1	37.40%	50.90%	13.50%
Summit RE-1	26.90%	41.20%	14.30%
Steamboat Springs RE-2	3.90%	20.50%	16.60%

**Overwhelming majority of Puente Grant recipients came from Garfield 16 schools

Appendix 3: Puente Grant Outcomes

Table 7: Puente Grant Basic Term Outcomes

Row Labels	Students	Total Credits	GPA
22/FA	16	105	2.48
22/SP	11	41.5	3.40
23/FA	34	232	2.42
23/SP	23	134.5	3.00
Grand Total	84	513	2.72

Table 8: Puente Grant Cohort Persistence

Row Labels	Students	Persisted After Award	Persistence Rate
22/FA	16	15	93.75%
22/SP	11	7	63.64%
23/FA	34	26	76.47%
23/SP	23	14	60.87%
Grand Total	84	62	73.81%

Appendix 4: Comparing Puente Grant with other CEPA populations in Key Program Areas

Rifle CEPA is a group comprised of the Rifle CEPA population that *excludes* the Puente Grant recipients. It is used because the overwhelming majority of Puente grant participants came from the Rifle location and it is therefore instructive when used along with the overall CEPA and CEPA LatinX populations (which are both college-wide groups).

Table 9: Welding Course Performance

Population	# of Students	Course Pass Rate	GPA
Puente Grant	29	89.60%	2.59
CEPA Overall	211	91.00%	2.99
CEPA LatinX	105	91.40%	2.96
RIFLE CEPA	87	89.66%	2.37

Table 10: Health Professional Course Performance

Population	# of Students	Course Pass Rate	GPA
Puente Grant	27	48.20%	2.02
CEPA Overall	149	67.79%	2.68
CEPA LatinX	72	56.94%	2.18
RIFLE CEPA	37	51.40%	2.10

Table 11: Automotive Course Performance

Population	# of Students	Course Pass Rate	GPA
Puente Grant	20	80.00%	2.62
CEPA Overall	517	86.90%	2.81
CEPA LatinX	159	77.00%	2.49
RIFLE CEPA	57	84.00%	2.60

Table 11: Nurse Assistant Course Performance

Population	# of Students	Course Pass Rate	GPA
Puente Grant	17	70.60%	2.71
CEPA Overall	187	80.75%	3.30
CEPA LatinX	96	80.20%	3.31
RIFLE CEPA	34	88.24%	3.47

Table 12: Biology Course Performance

Population	# of Students	Course Pass Rate	GPA
Puente Grant	17	82.30%	3.13
CEPA Overall	991	87.80%	3.30
CEPALatinX	96	80.20%	3.31
RIFLECEPA	60	96.60%	3.23

Table 13: Mathematics Course Performance

Population	# of Students	Course Pass Rate	GPA
Puente Grant	16	62.50%	2.59
CEPA Overall	1957	80.68%	3.15
CEPALatinX	96	80.20%	3.31
RIFLECEPA	167	85%	3.05

Table 14: Carpentry Course Performance

Population	# of Students	Course Pass Rate	GPA
Puente Grant	12	100.00%	3.78
CEPA Overall	152	97.30%	3.66
CEPALatinX	72	94.40%	3.54
RIFLECEPA	12	66.67%	3.46

Appendix 5: CEPA Coordinator Feedback

- 100% of coordinators would recommend continuing the program and offering more financial aid opportunities for concurrent enrollment students

Coordinator comments about the Prospect of Continuing this type of Aid

“I think it is a great opportunity because not all schools pay for additional cost beyond tuition for students and these additional costs can very well be a barrier. We need better communication about what the program is; however, and it would be helpful to receive a list of the students who are granted the money through Puente each semester so that we can have accurate billing spreadsheets.”

“Without the assistance of this grant, it's highly probable that numerous students who received it would have been unable to register for their desired CMC course or program. Given the absence of other Concurrent Enrollment aid scholarships available to my students, this grant stands as their sole opportunity to participate if they cannot afford the additional books/fees charge(s). The students who have benefited from this award have demonstrated an exceptional level of determination. They express immense gratitude for the support provided and are motivated to excel in the courses that this award has enabled them to take.”

“Great for students whose high schools don't provide books, lab equipment, or pay for LMP and course fees. Districts can change what they are willing to fund.”

Coordinator comments about Financial Aid Coverage

“Towards a purchase of a computer. The Chromebooks can have certain limitations and a regular computer might be needed.”

“I believe that the cost of books and fees that is not covered for some school districts is the primary concern for my students when it comes to additional expenses.”

“Housing and meal plan costs for ASCENT students since they cannot access any scholarships or financial aid.”

“Fees and books. Transportation.”

Coordinator Comments about Marketing or Organization

“A one page flyer is always a good thing that we Coordinators can use to share with families and students. This would need to be shared with all CEPA students since we cannot know their financial status due to confidentiality reasons. I also would like to know how these funds are used when the schools pay for the entirety of the student's bill?”

“To enhance the effectiveness of future initiatives and scholarships like the Puente Grant for concurrent enrollment students, I advocate for providing tailored support and guidance throughout the application and utilization process. This encompasses offering individualized assistance in completing applications, clarifying eligibility criteria, and facilitating access to resources. Additionally, I propose forging strong partnerships with high schools and school districts to seamlessly integrate information about these initiatives and scholarships into existing programs and support frameworks. This collaborative effort could entail embedding pertinent details into college and career readiness initiatives, academic advising sessions, and parent/student meetings, ensuring widespread awareness and accessibility.”

“Targeted to CEPA students that we know may be experience barriers to them being interested in CEPA.”

Coordinator Comments about Impact of Program Expansion on Enrollment

“Yes, offering more robust financial aid opportunities for CEPA students is likely to encourage more students to enroll for several reasons - Increased Access: Financial aid reduces the financial barrier to accessing higher education. Many students may be deterred from enrolling in concurrent enrollment courses due to concerns about affordability. By offering robust financial aid opportunities, more students from diverse socioeconomic backgrounds can access these programs. I have several schools that I work with that do not cover the cost of books and fees for college courses. Improved Equity: Robust financial aid can help level the playing field and promote equity in access to educational opportunities. Students from low-income families may face greater financial obstacles to enrolling in concurrent enrollment courses. By providing financial aid, CMC can help mitigate these disparities and ensure that all students have equal access to high-quality educational experiences. Enhanced Affordability: High costs associated with college textbooks, course fees, and transportation can be significant barriers for CEPA students. Financial aid can help alleviate these costs, making concurrent enrollment more affordable and accessible to a broader range of students. Increased Motivation: Knowing that financial support is available can motivate students to take advantage of concurrent enrollment opportunities. Financial aid can serve as an incentive for students to enroll in challenging courses, pursue academic excellence, and achieve their educational goals. Long-term Benefits: Access to concurrent enrollment programs can have long-term benefits for students, including increased college readiness, academic success, and opportunities for advanced coursework. By expanding financial aid opportunities for CE students, CMC can empower more students to take advantage of these benefits and prepare for success in higher education and beyond. Overall, offering more robust financial aid opportunities for CEPA students is likely to encourage greater enrollment, promote equity in access to education, and provide students with the support they need to succeed academically and professionally.”

“There are students who don't even consider CEPA because they know/assume there will be some costs involved, which there are. Books and fees etc.”

Appendix 6: Student Feedback (n=14)

- 83% report knowing little to nothing about the program
- 100% of indicate that receiving the money helped them enroll or stay enrolled.
- 80% indicate they would take more courses through CMC if more funding were available

Student Comments on Value of Funding

“It would make students not so stressed to take those kinds of courses knowing they would be getting help.”

“It helps many of the students in our community that would not pursue an education if these classes had to be paid for. Personally by next year I will have 4-5 nursing prerequisites done of this grant is maintained. If more funding was available i would start doing my gen ed classes through CMC which would be more useful than my AP courses since these classes are accredited for the entire state of Colorado and i plan to go to a Colorado university for my nursing degree. This grant has not only impacted me, it has impacted the choices of many other students as well.”

“Yes, because it allowed me to feel more comfortable and confident to take the opportunity to take classes and get my degree.”

“If this grant is not upheld and is scrapped for next year. I dont think i would be able to take concurrent enrollment classes.”

Student Comments on Financial Barriers They Face

“Gas.”

“Money.”

“My family is considered low income, so I’m dependent on scholarships and grants to attend college. These classes are in the hundreds range typically and my family would not be able to afford them if it weren’t for this grant”

Colorado Student Grant Innovation Program for Concurrent Enrollment

Pueblo Community College serves as a vital educational hub, covering one of the largest and most diverse service areas in the State of Colorado, spanning 11,000 square miles. Through collaborative partnerships with over 70 high schools across 40 distinct school districts, the college facilitates concurrent enrollment programs, enriching the academic journeys of over 3,000 students annually.



Pueblo Community College has experienced tremendous growth in the concurrent enrollment program over the past 3 years. In fact, in AY 22-23, PCC realized the largest one-year increase among all CCCS colleges:

	AY 18-19	AY 19-20	AY 20-21	AY 21-22	AY 22-23	AY 23-24
PCC	2,059	2,448	2,256	2,564	3,450	4,053
% Gain (Loss)		+17%	(-8.5%)	+13.6%	+34.5%	+17.5%*

Source: Academic Year 2022-2023: High School Students Attending CCCS Colleges Annual Report

*as of 3/4/24

AY 23-24 is also proving to be a period of growth in concurrent enrollment at PCC.

Much of that gain was due to more high school students taking college courses through PCC at their high school. In keeping with the goals of the innovative use of a portion of the Colorado Student Grant to be used “To expand Concurrent Enrollment student access and success, as direct costs for college textbooks and materials are not funded under current law for high school students. This expanded access would specifically target low-income students who remain underrepresented in both Concurrent Enrollment and post-secondary participation, as recognized in the State’s Higher Education Master Plan.” (CMC-CCCS-DHE Memorandum of Understanding, page 1)

Moreover, our plan and funding initiatives are specifically aimed at expanding access to concurrent enrollment programs for low-income students. We are dedicated to providing financial assistance to students who may otherwise be unable to participate in these courses due to financial constraints. By offering essential financial resources, we aim to ensure that all students, regardless of economic background, have the opportunity to benefit from concurrent enrollment and advance their educational pursuits.

Due to our partnerships, PCC has successfully increased access to concurrent enrollment courses by credentialing more high school instructors and through innovative delivery of courses both synchronously and asynchronously. Additionally, our goal was to also ensure that concurrent enrollment was as free as possible to students and lessen the burden for school districts. The CSG Funding has been central to realizing that goal.

The primary areas of expenses for students fall into 3 categories:

1. Books (both hardcopy and digital)
2. Supplies (course specific supplies and technology)
3. Fees (course fees – mostly for CTE programs)

PCC allocated \$160,000.00 in CSG Funds to support the program. For the 2022-23 Academic Year, the total amount of CSG Funding provided to students was: \$95,203.48; the average award was: \$186.90.

Through the program, PCC was able to support 514 students from 8 school districts and 13 high schools. Fall 2022-Spring 2023 Data – Colorado Student Grant Participants:

District Information

District Served	High School	High School Population	Number of CE Participants	Percent of Students Participating in CE	District Free & Reduced Lunch Percentage
Bayfield 10 JT-R	Bayfield High School	423	143	33.8%	39.4%
Dolores RE-4A	Dolores Senior High School	680	66	9.7%	49.4%
Durango 9-R	Durango High School	1,343	415	30.9%	39.5%
Fremont RE-1	Canon City High School	954	606	63.5%	59.9%
Fremont RE-2	Florence High School	392	81	20.7%	55.7%
Mancos RE-6	Mancos High School	154	120	77.9%	53.5%
Montezuma-Cortez RE-1	Montezume-Cortez High School	602	123	20.4%	63.4%
Montezuma-Cortez RE-1	Southwest Open High School	134	12	9.0%	81.3%
Pueblo District 60	Centennial High School	824	156	18.9%	83.7%
Pueblo District 60	Central High School	1,053	232	22.0%	83.7%
Pueblo District 60	Paragon Learning Center	469	27	5.8%	83.7%
Pueblo District 60	Pueblo East High School	1,024	217	21.2%	83.7%
Pueblo District 60	Pueblo South High School	895	233	26.0%	83.7%
					State FRL = 45.9%

Source: <https://www.cde.state.co.us/schoolview/explore/welcome> and PCC Navigate 360 Reports

The majority of the school districts that PCC partners with have student populations varying in size and are predominantly rural, with a majority exceeding the state's free and reduced lunch rate of 45.9%.

Concurrent Enrollment Information

District Served	High School	Number of CE Participants	Percent of Students Participating in CE	Credits Completed by all CE Participants
Bayfield 10 JT-R	Bayfield High School	143	33.8%	969
Dolores RE-4A	Dolores Senior High School	66	9.7%	645
Durango 9-R	Durango High School	415	30.9%	2,609
Fremont RE-1	Canon City High School	606	63.5%	8,071
Fremont RE-2	Florence High School	81	20.7%	930
Mancos RE-6	Mancos High School	120	77.9%	1,356
Montezuma-Cortez RE-1	Montezume-Cortez High School	123	20.4%	994
Montezuma-Cortez RE-1	Southwest Open High School	12	9.0%	44
Pueblo District 60	Centennial High School	156	18.9%	962
Pueblo District 60	Central High School	232	22.0%	1,414
Pueblo District 60	Paragon Learning Center	27	5.8%	131
Pueblo District 60	Pueblo East High School	217	21.2%	875
Pueblo District 60	Pueblo South High School	233	26.0%	1,203

Source: <https://www.cde.state.co.us/schoolview/explore/welcome> and PCC Navigate 360 Reports



Community College

Colorado Student Grant Information

District Served	High School	Number of CE Participants	Number of CSG Recipients	Percent of CE Students Receiving CSG	Credits Completed CSG Recipients	Percent of Credits Completed by CSG Recipients
Bayfield 10 JT-R	Bayfield High School	143	69	48.3%	240	24.8%
Dolores RE-4A	Dolores Senior High School	66	17	25.8%	53	8.2%
Durango 9-R	Durango High School	415	78	18.8%	234	9.0%
Fremont RE-1	Canon City High School	606	69	11.4%	222	2.8%
Fremont RE-2	Florence High School	81	23	28.4%	72	7.7%
Mancos RE-6	Mancos High School	120	9	7.5%	25	1.8%
Montezuma-Cortez RE-1	Montezume-Cortez High School	123	49	39.8%	151	15.2%
Montezuma-Cortez RE-1	Southwest Open High School	12	4	33.3%	15	34.1%
Pueblo District 60	Centennial High School	156	22	14.1%	61	6.3%
Pueblo District 60	Central High School	232	68	29.3%	206	14.6%
Pueblo District 60	Paragon Learning Center	27	16	59.3%	51	38.9%
Pueblo District 60	Pueblo East High School	217	32	14.7%	98	11.2%
Pueblo District 60	Pueblo South High School	233	58	24.9%	176	14.6%

Source: <https://www.cde.state.co.us/schoolview/explore/welcome> and PCC Navigate 360 Reports

On average, 27.7% of students in participating schools were enrolled in concurrent enrollment courses. Among these students, 27.4% received CSG funds to support their educational needs. Out of the 514 participants, an impressive 86.5%, or 445 students, successfully passed their classes. It's worth noting that without CSG support, many of these students might not have opted to participate in concurrent enrollment courses due to concerns about adding financial strain to their families.

Complete Data Table

District Served	High School	High School Population	Number of CE Participants	Percent of Students Participating in CE	District Free & Reduced Lunch Percentage	Credits Completed by all CE Participants	Number of CSG Recipients	Percent of CE Students Receiving CSG	Credits Completed CSG Recipients	Percent of Credits Completed by CSG Recipients
Bayfield 10 JT-R	Bayfield High School	423	143	33.8%	39.4%	969	69	48.3%	240	24.8%
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Pueblo District 60	Pueblo South High School	895	233	26.0%	83.7%	1,203	58	24.9%	176	14.6%

PCC staff met with school representatives to inform them of the CSG Program. This collaboration empowered school staff to actively promote concurrent enrollment courses within their institutions, thus contributing significantly to the attainment of the program's initial objectives.

Pueblo Community College enthusiastically advocates for the reinstatement of the CSG Program by the Colorado Department of Education, commencing in Spring 2024. Such reinstatement is imperative to ensure equitable access for all students, irrespective of their geographical location or financial constraints, enabling them to partake in concurrent enrollment programs and actualize their educational and career aspirations.

Submitted by:

Michael J. Gage, Senior Director
 Student Support & Outreach
 Pueblo Community College
 March 4, 2024

COLORADO COMMISSION ON HIGHER EDUCATION - BYLAWS

Section 1. Organization and Meetings

- 1.1 **Organization:** Pursuant to C.R.S. §23-1-102, the Commission shall consist of eleven members appointed by the Governor with the consent of the Senate. The members of the Commission are selected on the basis of their knowledge of and interest in higher education and shall serve for four-year terms. No member of the Commission may serve more than two consecutive full four-year terms.
- 1.2 **Officers:** Pursuant to C.R.S. §23-1-110, the officers of the Commission shall be the Chair and Vice Chair. The Secretary shall be the Executive Director of the Commission and the Department and is a non-voting member of the Commission. The Governor appoints, with the consent of the Senate, the Executive Director to serve as the executive officer of the Commission and the Department.
- 1.3 All officers shall be elected at the May meeting of the Commission to serve a term of one year, except the Secretary whose term shall be coterminous with his or her term as Executive Director. Any member may nominate themselves or another member to be chair or vice-chair. Members will vote on each position; if there is more than one nomination the vote will be conducted by private ballot to be counted by the Secretary. Officers shall be limited to two consecutive terms, unless an exception is approved by a vote of more than 60 percent of the Commission. When possible, a Commissioner is encouraged to serve as vice-chair prior to becoming chair.
- 1.4 **Regular Meetings of the Commission:** The Commission shall adopt at the October Commission meeting a schedule of regular meetings of the Commission for the following calendar year.
- 1.3 **Notice of Meetings:** Any meetings at which the adoption of any proposed policy, position, resolution, rule, regulation, or formal action occurs or at which a majority or quorum of the body is in attendance, or is expected to be in attendance, shall be held only after full and timely notice to the public. In addition to any other means selected by the Commission for giving notice to the public, the Commission shall post notice of its meetings at the office of the Colorado Department of Higher Education located at 1560 Broadway, Suite 1600, Denver, Colorado 80202 and on the Colorado Department of Higher Education website. Notices shall be posted no less than two days prior to the holding of the meeting. The posting shall include specific agenda information where possible.
- 1.4 **Special Meetings:** Special meetings of the Commission may be held at the call of the Chair on two days' notice, or at the request of five members of the Commission who may petition the Chair to call such a meeting. Notice of special meetings shall be made electronically or by telephone and posted at the office and on the website of the Colorado

Department of Higher Education no less than two days prior to the meeting date.

- 1.5 **Conduct of Meetings:** The Chair shall preside at all meetings at which he or she is present. In the Chair's absence, the Vice Chair shall preside, and in the event both are absent, those present shall elect a presiding officer. All meetings shall be conducted in accordance with all State laws and regulations. The parliamentary rules contained in Robert's Rules of Order, latest revision, shall govern in all cases to which they are applicable, except as modified herein.
- 1.6 **Attendance at Meetings:** The term of any member of the Commission who misses more than two consecutive regular Commission meetings without good cause, as determined by the Chair, shall be terminated and his successor appointed in the manner provided for appointments under C.R.S. §23-1-102.
- 1.7 **Preparation of Agenda:** Meeting agendas shall be prepared by the Executive Director of the Department. A monthly agenda call will be scheduled with the Chair, Vice Chair, and Executive Director, or his or her designee, to discuss and approve the proposed agenda. At a regular or special meeting, an item of business may be considered for addition to the agenda by a majority vote of the Commissioners present.
- 1.8 **Minutes of the Commission:** The Secretary shall maintain an accurate set of minutes of Commission meetings, which shall include a complete record of all actions taken by the Commission. Such minutes shall constitute a permanent record. After the minutes of each meeting are completed they shall be reviewed by the Commission and, after approval, posted on the CCHE website and made available to the public for inspection upon written request.
- 1.9 **Standing Committees:** The Commission may create standing or ad hoc committees comprised of Commissioners to research and make recommendations on specific issues for the full Commission to consider and act on.

Section 2. Duties and Responsibilities of Officers

- 2.1 **Chair of the Commission:** The Chair of the Commission shall preside at meetings of the Commission at which he or she is in attendance.
- 2.2 **Vice Chair of the Commission:** The Vice Chair shall perform all duties of the Chair in the Chair's absence.
- 2.3 **The Secretary/Executive Director of the Commission:** In addition to performing those duties established by law, the Executive Director of the Commission and Department shall: (a) serve as the Secretary of the Commission, (b) meet with the officers and staff of institutions of higher learning as the needs dictate for a mutual discussion of the matters affecting the responsibilities of the Commission, (c) meet with appropriate state and federal groups and/or officials on matters pertaining to the Commission, (d) meet with appropriate committees of the General Assembly on matters pertaining to the

Commission's responsibilities, (e) appoint such professional staff as in his or her judgment are required and are within the budget approved by the Commission and for which funds are available, (f) prepare an annual operating budget and work program for approval by the Commission, (g) implement the policies of the Commission and communicate those policies to interested parties as appropriate.

Section 3. The Advisory Committee

3.1 There is hereby established an advisory committee pursuant to C.R.S. §23-1- 103).

Advisory Committee Members: The advisory committee shall consist of not less than thirteen members, to be designated as follows:

(a) Six members shall be appointed from the General Assembly, including three senators, two of whom shall be from the majority party, appointed by the President of the Senate and one of who shall be from the minority party appointed by the Minority Leader of the Senate, and three representatives, two of whom shall be from the majority party, appointed by the Speaker of the House of Representatives and one of who shall be from the minority party appointed by the Minority Leader of the House of Representatives. Said six members shall be appointed for terms of two years or for the same terms to which they were elected to the general assembly, whichever is the lesser. Successors shall be appointed in the same manner as the original members;

(b) One member shall be selected and designated by the Commission, as recommended by the Colorado Faculty Advisory Council, to represent the faculty in the state;

(c) One member shall be selected and designated by the Commission, as recommended by the Student Affairs Council, to represent the students in the state for a term of one year, commencing on July 1 of the year appointed;

(d) One member shall be selected and designated by the Commission who is a parent of a student enrolled in a state supported institution of higher education in Colorado to represent the parents of students for a term of two years, commencing on July 1 of the year appointed.

(e) Not more than four additional members representing educational or other groups may be selected and designated by the Commission to serve on the advisory committee.

The Commission has designated the four additional advisory committee members to represent:

- Chief Academic Officers of Colorado's state supported institutions of higher education, as recommended by the Colorado Academic Council;
- Chief Financial Officers of Colorado's state supported institutions of higher education, as recommended by the, as recommended by the Chief Financial Officers group;

- Independent Higher Education Institutions in Colorado (Colorado College, Regis, and Denver University), as recommended by the Independent Higher Education Council; and,
- The K-12 system, as recommended by the Colorado Department of Education.

All such appointments shall be for a term of two years, commencing on July 1 of the year appointed.

- 3.2 Notice and Agendas: All members of the advisory committee shall receive agendas and background material and be notified of all public meetings of the Commission and shall be invited to attend for the purpose of suggesting solutions for the problems and needs of higher education and maintaining liaison with the general assembly.
- 3.3 Recommendations of the Advisory Committee: The members of the advisory committee shall have full opportunity to present their views on any matter before the Commission.

Section 4. Change in Bylaws

- 4.1 Bylaws shall be subject to amendment at any meeting of the Commission provided any such proposed change is listed on the agenda in accordance with the procedure outlined in Section 1.5 Notice of Meetings. Bylaw changes must be approved by a majority of the Commission.

HISTORY: Adopted on September 10, 1965. Amended January 14, 1966; February 25, 1972; June 1, 1978; July 1, 1993; October 7, 2004; May 6, 2011; CCHE Agenda March 3, 2017 Item V; April 5, 2019



INSTITUTION AND SYSTEM LEADERS

<u>INSTITUTION</u>	<u>CEO</u>	<u>LOCATION</u>
Adams State University	David Tandber, President	Alamosa
Aims Community College	Dr. Leah Bornstein, President	Greeley
Community College System	Joe Garcia, Chancellor	Denver
Arapahoe CC	President Dr. Stephanie Fujii,	Littleton
Colorado Northwestern CC	President Dr. Lisa Jones	Rangely
CC of Aurora	President Mordecai Brownlee,	Aurora
CC of Denver	President Marielena DeSanctis	Denver
Front Range CC	President Colleen Simpson	Westminster
Lamar CC	President Dr. Linda Lujan	Lamar
Morgan CC	President Dr. Curt Freed	Ft. Morgan
Northeastern JC	President Michael White	Sterling
Otero JC	President Dr. Timothy Alvarez	La Junta
Pikes Peak CC	President Dr. Lance Bolton	Colorado Springs
Pueblo CC	President Dr. Patty Erjavec	Pueblo
Red Rocks CC	President Dr. Michele Haney	Lakewood
Trinidad State JC	President Dr. Rhonda Epper	Trinidad
Colorado Mesa University	President John Marshall	Grand Junction
Colorado Mountain College	President Dr. Carrie Besnette Hauser	Glenwood Springs
Colorado School of Mines	President Paul Johnson	Golden
Colorado State System	Dr. Tony Frank, Chancellor	Denver
CSU-Ft Collins	President Amy Parsons	Fort Collins
CSU-Pueblo	President Armando Valdez	Pueblo
CSU-Global Campus	President Becky Takeda-Tinker	Aurora
CU System	Interim President Todd Saliman	Denver
CU – Boulder	Chancellor Dr. Philip DiStefano	Boulder
UCCS	Chancellor Jennifer Sobanet	Colorado Springs
UCD	Chancellor Dr. Michelle Marks	Denver
UC-Anschutz	Chancellor Don Elliman	Aurora
Emily Griffith Technical College	Randy Johnson, Executive Director	Denver
Ft. Lewis College	President Dr. Tom Stritikus	Durango
Metropolitan State University of Denver	President Janine Davidson	Denver



Pickens Technical College	Dr. Teina McConnell, Executive	Aurora
Technical College of the Rockies	Randall Palmer, Director	Delta
University of Northern Colorado	Dr. Andy Feinstein, President	Greeley
Western State Colorado University	Brad Baca, President	Gunnison

Higher Education Glossary

529 Savings Plan - 529 plans are more than just savings accounts. These state-sponsored college savings plans were established by the federal government in Section 529 of the Internal Revenue Code to encourage families to save more for college. They offer unique state and federal tax benefits you can't get from other ways to save, making them one of the best ways to save for college.

Accuplacer - A suite of computer-adaptive placement tests that are used as assessment tools at institutions to evaluate the level of course work for a student. Students measured as needing additional course work will be assigned to remediation.

Admission Standard - includes both Freshman and Transfer standard. The freshman standard applies to all in-state and out-of-state new freshmen applicants and to transfer applicants with 12 or fewer college credit hours, except freshmen and transfer applicants who meet one of the admissions standards index exemptions. The transfer standard applies to all degree-seeking undergraduate transfer applicants with more than 12 college credit hours who do not meet one of the exemptions

Admission Window - Defined in Admission policy, "The maximum allowable percentage of admitted students who are not required to meet the CCHE admission standards within a specific fiscal year is referred to as the admissions window. Separate windows exist for the freshmen and transfer standards. The allowable percentage is determined by the Commission." The percentages vary by institution.

CAP4K - SB08-212, Preschool to Postsecondary Education Alignment Act; Colorado Achievement Plan for Kids.

CHEA - Council for Higher Education Accreditation. As described on their website, CHEA is "A national advocate and institutional voice for self-regulation of academic quality through accreditation, CHEA is an association of 3,000 degree-granting colleges and universities and recognizes 60 institutional and programmatic accrediting organizations."

CIP - Classification of Instructional Program; The purpose of which is to provide a taxonomic scheme that will support the accurate tracking, assessment, and reporting of fields of study and program completions activity. (Relevant in Role & Mission)

CLEP - College Level Examination Program; Earn college credit for passing a subject specific examination.

COA - Cost of Attendance; in the context of financial aid, it is an estimate of what it will reasonably cost the student to attend a given institution for a given period of time.

Concurrent Enrollment – A high school student enrolled for one or more classes at a college or university in addition to high school courses.

Dually Enrolled - A student enrolled at two institutions at the same time. This may affect enrollment reports when both institutions count that student as enrolled.

EFC - Expected Family Contribution; in the context of financial aid, it is calculated by a federally-approved formula that accounts for income, assets, number of family members attending college, and other information.

FAFSA - Free Application for Federal Student Aid. This is a free service provided by the Federal government under the Department of Education and students are not charged to complete/file the FAFSA.

FAP – Financial Aid Plan (HESP specific)

FERPA - Family Educational Rights and Privacy Act, view federal website. The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

FFS – Fee-For-Service Contracts; A portion of the College Opportunity Fund program in addition to COF stipends, this contract provides funding to certain higher education institutions to supplement high cost programs and purchase additional services (such as graduate programs).

Floor - In reference to the admission window, the floor is the minimum requirements for admission without requiring an exception of some kind. This usually coincides with the Index score.

FTE - Full-time Equivalent; a way to measure a student's academic enrollment activity at an educational institution. An FTE of 1.0 means that the student is equivalent to full-time enrollment, or 30 credit hours per academic year for an undergraduate student.

GEARUP - Gaining Early Awareness and Readiness for Undergraduate Programs; A Federal discretionary grant program designed to increase the number of low-income students who are prepared to enter and succeed in postsecondary education.

Guaranteed Transfer, GT Pathways - gtPATHWAYS applies to all Colorado public institutions of higher education, and there are more than 900 lower-division general education courses in 20 subject areas approved for guaranteed transfer. Courses are approved at least twice per academic and calendar year and apply the next semester immediately following their approval.

HB 1023 - In most cases, refers to HB 06S-1023, which declares "It is the public policy of the state of Colorado that all persons eighteen years of age or older shall provide proof that they are lawfully present in the United States prior to receipt of certain public benefits."

HB 1024 - In most cases, refers to HB 06-1024, which declares "On or before September 1, 2006, each governing board of a state institution of higher education shall submit to the Colorado commission on higher education and the education committees of the senate and the house of representatives, or any successor committees, a report regarding underserved students".

HB 1057 - In most cases, refers to HB 05-1057, which declares "a college preparation program operating within the school district that the college preparation program shall provide to the Colorado commission on higher education, on or before December 31 of each school year, a report specifying each student, by unique identifying number."

HEAR - Higher Education Admission Requirements, 2008-2010.

Index, Index Score - This index score is a quantitative evaluation that is part of a larger student application evaluation. The score is generated from academic achievement (GPA or High School Rank) and college placement tests (ACT or SAT). You can calculate your index score online. Index varies by institution depending on that institutions selection criteria.

IPEDS - Integrated Postsecondary Education Data System; Run by NCES, this system collects statistical data and information on postsecondary institutions. The Colorado Department of Higher Education submits aggregated data on public institutions to IPEDS.

Need - In the context of student financial aid, Need is calculated by the difference between the COA (Cost of Attendance) and the EFC (Expected Family Contribution)

NCATE - National Council for Accreditation of Teacher Education; NCATE is the profession's mechanism to help establish high quality teacher preparation.

NCLB - No Child Left Behind; The No Child Left Behind Act of 2001 (NCLB) reauthorized the Elementary and Secondary Education Act (ESEA) -- the main federal law affecting education from kindergarten through high school.

PSEO - Post Secondary Enrollment Option; A program that offers concurrent enrollment in college courses while in high school.

PWR - Postsecondary and Workforce Readiness; Definition was created during the SB08-212 CAP4K meetings.

QIS - Quality Indicator System; Implemented in HB96-1219, the specific quality indicators involved in QIS are similar to those used in the variety of quality indicator systems found in other states: graduation rates, freshmen retention and persistence rates, passing scores or rates on tests and licensure examinations, undergraduate class size, faculty teaching workload rates, and institutional support/administrative expenditures.

REP - Regional Education Provider; Colorado Statute authorizes Adams State College, Fort Lewis College, Mesa State College and Western State College to function as regional

educational providers and “have as their primary goal the assessment of regional educational needs...”
Regional education providers focus their attention on a certain geographical area.

SB 3 – In most cases refers to SB10-003, the Higher Education Flexibility Bill.

SB 212 - In most cases, refers to HB 08-212, the CAP4K legislation.

SBE - State Board of Education; As described on their website, "Members of the Colorado State Board of Education are charged by the Colorado Constitution with the general supervision of the public schools. They have numerous powers and duties specified in state law. Individuals are elected on a partisan basis to serve six-year terms without pay."

SFSF – State Fiscal Stabilization Fund; A component of the ARRA legislation and funding.

SURDS - Student Unit Record Data System

WICHE - Western Interstate Commission for Higher Education; A regional research and policy organization that assists students, policymakers, educators, and institutional, business and community leaders. WICHE states include: Alaska, Arizona, California, Colorado, Hawaii, Idaho, Montana, Nevada, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming.

WUE - Western Undergraduate Exchange Program, managed by WICHE