

Colorado Commission on Higher Education  
Department of Higher Education

# Higher Education Transfer Credits

Performance Audit  
September 2025  
2459P



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September 25, 2025

Members of the Legislative Audit Committee:

This report contains the results of a performance audit of the Colorado Commission on Higher Education's (Commission) and the Department of Higher Education's (Department) oversight of the higher education transfer credit system. The audit was conducted pursuant to Section 2-3-108, C.R.S., which requires the State Auditor to conduct a special audit requested by a member of the General Assembly or the Governor, when approved by a majority vote of the Legislative Audit Committee. The Legislative Audit Committee approved this audit in response to a legislative request, which expressed concerns about whether the transfer credit processes outlined in statute were realizing intended outcomes for students in the areas of statewide transfer agreements, Guaranteed Transfer (GT) Pathways, and college-level learning acquired during military service. The report presents our findings, conclusions, and recommendations, and the responses of the Commission and Department

*Kerri L. Hunter*



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# Report Highlights



## Higher Education Transfer Credits

Colorado Commission on Higher Education • Department of Higher Education  
Performance Audit • September 2025 • 2459P

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### Key Concern

The Colorado Commission on Higher Education (Commission) and the Department of Higher Education (Department) can improve policies and oversight to help students benefit from statutory credit transfer guarantees and credit for military experience.

### Key Findings

- Statewide transfer agreements and Guaranteed Transfer (GT) Pathways generally worked as expected, though some students lost credits in transfer. Military students who submitted their military transcripts for evaluation by institutions of higher education (colleges) generally received some credit for their military experience.
- In cases where students submitted transcripts but did not benefit from statutory credit transfer guarantees, we found the primary reasons to be (a) students did not submit additional documentation or complete review processes deemed necessary by the college for credits earned from prior learning or for previously transferred credit, or (b) colleges deemed credits ineligible to transfer or not needed for students’ degrees. Of 176 students auditors reviewed, 23 students (13 percent) experienced these problems.
- Of 176 students auditors reviewed, 37 students (21 percent) lost credit due to the student not submitting their transcripts. We found that their colleges had disparate practices in following up with students to remind them of missing documentation.

### Background

- Statute guarantees credit transfer between Colorado’s public colleges if credits are earned under statewide transfer agreements or are GT Pathways courses, and gives colleges discretion to award college credit for military experience. The Commission, staffed by the Department, sets policies on how all Colorado public colleges award and apply these transfer credits.

Audit Recommendations Made	Agency Responses		
	Agree	Partially Agree	Disagree
19	19	0	0



# Chapter 1

## Overview

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For more than 40 years, state policymakers have recognized that the transfer of credits across Colorado’s public higher education institutions, which we generally refer to as “colleges” in this report, can help students be successful in completing their postsecondary education. Nationally, an estimated 35 percent of college students transfer colleges at some point in a 6-year period. In Colorado, students are increasingly working to earn college credit starting in high school; stacking credentials as they go, such as earning an associate degree before earning a bachelor’s degree; and transferring among colleges to best suit their needs. According to a 2025 resource guide published by the U.S. Department of Education on improving credit mobility, student pathways are becoming more complex and college students are increasingly mobile across institutions of higher education and other learning environments. For example, with college costs rising over the years, students can save money by attending a college where they can save on housing costs or save on tuition before transferring to a different college that may better meet their needs as they work to complete their degree. Improving credit mobility can be a strategy for helping students successfully complete their higher education credentials, including associate and bachelor’s degrees.

Statute provides for a couple of key ways for students to have credit mobility during their postsecondary education, as follows:

- **Statewide transfer agreements** between Colorado public 2-year and 4-year colleges that allow students to earn an associate degree, called a degree with designation, at a 2-year college and transfer and enroll in a 4-year college to seek a bachelor’s degree in the same field of study with status as a junior [Section 23-1-108(7), C.R.S.].
- **Guaranteed Transfer (GT) Pathways**, which is a system of guaranteed transfer of certain general education courses among Colorado’s public colleges to help students be more flexible as they pursue their associate and bachelor’s degrees [Sections 23-1-108.5 and 23-1-125(3), C.R.S.]. Examples of GT Pathways courses include College Algebra, Introduction to Literature, and General Chemistry.
- **Credit for college-level learning acquired while in the military**, available for active duty, reserve, or veteran U.S. military service members based on their military experience [Section 23-5-145, C.R.S.].
- **Dual and concurrent enrollment programs**, which allow high school students to be dual enrolled at both their high school and a college in order to earn college credit while in high school. If the student later enrolls after high school as a degree-seeking student at a college, they can attempt to transfer their dual enrollment credits into their college and degree program.

Concurrent Enrollment is one such program under the State's Concurrent Enrollment Programs Act [Section 22-35-101 et seq., C.R.S.].

- **Prior learning credit**, such as credit earned through Advanced Placement (AP), International Baccalaureate (IB), or College-Level Examination Program (CLEP) exams taken in high school [Section 23-1-125(4.5), C.R.S.]. If the student later enrolls after high school as a degree-seeking student at a college, they can attempt to transfer their dual enrollment credits into their college and degree program.

## Colorado's College System

Colorado has 28 public colleges that offer undergraduate associate and bachelor's degrees. The 2-year colleges primarily offer associate degrees and 4-year colleges primarily offer bachelor's degrees. The 13 colleges primarily offering 4-year bachelor's degrees are established in statute to be governed by either individual or system governing boards (i.e., University of Colorado system and the Colorado State University system) [Title 23, Articles 20 through 56 C.R.S.]. The 13 community colleges are overseen by the Colorado Community College System (CCCS) under Section 23-60-201, C.R.S., and two local district colleges are overseen by their own governing boards under Section 23-71-102(1), C.R.S., though the local district colleges often follow along with CCCS policies. Exhibit 1.1 provides the names of each of Colorado's 2-year and 4-year colleges and the location of their main campuses.

## Exhibit 1.1

### Colorado's Public Colleges by Name, Type, and Location

2-Year Community College	4-Year College
Arapahoe Community College (Littleton)	Adams State University (Alamosa)
Colorado Northwestern Community College (Rangely)	Colorado Mesa University <sup>1</sup> (Grand Junction)
Community College of Aurora (Aurora)	Colorado School of Mines (Golden)
Community College of Denver (Denver)	Colorado State University (Fort Collins)
Front Range Community College (Fort Collins)	Colorado State University – Pueblo (Pueblo)
Lamar Community College (Lamar)	Colorado State University – Global (Online)
Morgan Community College (Fort Morgan)	Fort Lewis College (Durango)
Northeastern Junior College (Sterling)	Metropolitan State University of Denver
Otero College (La Junta)	University of Colorado – Boulder
Pikes Peak State College (Colorado Springs)	University of Colorado – Colorado Springs
Pueblo Community College (Pueblo)	University of Colorado – Denver
Red Rocks Community College (Lakewood)	University of Northern Colorado (Greeley)
Trinidad State College (Trinidad)	Western Colorado University (Gunnison)

2-Year Local District Colleges
Aims Community College (Greeley, Windsor, Fort Lupton)
Colorado Mountain College <sup>2</sup> (Various)

Source: Office of the State Auditor analysis of Department of Higher Education data on postsecondary institutions in Colorado.

<sup>1</sup> Under Section 23-53-101, C.R.S., Colorado Mesa University is required to maintain a community college role. The college's community college division, CMU Tech (formerly known as Western Colorado Community College) is overseen by the Board of Trustees of Colorado Mesa University and not by the Colorado Community College System. For the purposes of our audit, we considered Colorado Mesa University and CMU Tech as one college.

<sup>2</sup> Colorado Mountain College has campuses in eight counties and nine school districts in the following locations: Aspen, Breckenridge, Carbondale, Dillon, Edwards, Glenwood Springs, Leadville, Rifle, Salida, and Steamboat Springs.

Colorado also has three area technical colleges that offer postsecondary vocational programs and are operated by a local school district or board of cooperative education services, but do not offer undergraduate degrees [Section 23-60-103(1), C.R.S.]. Our audit work did not focus on these colleges, and instead focused on Colorado's 28 public colleges that award 2-year and 4-year undergraduate degrees.

## Administration

### Colorado Commission on Higher Education (Commission)

Established in 1965, the Commission is an 11-member board charged with maximizing postsecondary education opportunities in Colorado through adopting policies and coordinating procedures around higher education [Sections 23-1-101 and 102 C.R.S.]. The Commission oversees the strategic direction of Colorado's higher education system, and sets policies and makes approvals related to higher education funding, student tuition and fees, financial assistance programs, colleges'

capital construction requests, degree and continuing education programs, academic admissions, and transfer credit processes, as is assigned throughout Title 23 Article 1, C.R.S. The Commission's duty, together with the Department of Higher Education, is "to implement the policies of the general assembly" [Section 23-1-101, C.R.S.] and all of the State's public colleges are obligated to comply with the policies set by the Commission [Section 23-1-102(2), C.R.S.], including policies governing the college transfer process.

The Commission's membership includes one member from each of the State's eight congressional districts and three members at-large, each appointed by the Governor with consent of the Senate. For these 11 Commission members, statute sets the following requirements [Section 23-1-102(3) and (4), C.R.S.]:

- At least one member must live west of the continental divide.
- No more than six members can be from the same political party.
- Members serve staggered 4-year terms and are limited to serving two consecutive terms.
- At the time of appointment, during their appointment, or within 1 year of appointment, members cannot be an officer, employee, or member of a college governing board or an officer or employee of a college.
- Members cannot be members of the General Assembly.
- The Commission's executive director is appointed by the Governor, with consent of the Senate, and also serves as executive director of the Department of Higher Education [Section 23-1-110(2)(a), C.R.S.].

## Department of Higher Education (Department)

Created under Section 24-1-114, C.R.S., the Department is led by the Commission's executive director and is responsible for implementing the policies adopted by the Commission and the General Assembly [Sections 23-1-110(2)(a) and 23-1-101, C.R.S.]. This means that the Department is expected to implement the relevant transfer credit policies set by the Commission.

## Funding

The Fiscal Year 2025 budget and appropriation to the Department was \$6.2 billion, with about \$10 million to the Department's administration, and \$5.5 million to the Commission's administration along with an appropriation of 39.9 full-time equivalent positions for Fiscal Year 2025. The remaining appropriation goes toward other entities or funds, including more than \$4 billion that goes to the colleges, \$1 billion that goes to the College Opportunity Fund, and \$45 million that goes to History Colorado.

## Data

The Department maintains student data provided by colleges within its database, Student Unit Record Data System (SURDS), which includes data on college enrollment, course enrollment, and degrees awarded. The Department uses SURDS data to complete federal and state reporting requirements. In June 2023, the Department experienced a data incident that impacted the Department's SURDS data collection, and it has been working to restore systems and return to normal operations. Due to this data incident, the Department only had data up to Spring 2022 for us to review during our audit.

## Recent Legislative Changes

In the past 5 years, the General Assembly has added or amended statutory provisions related to credit transfer requirements. Our audit work did not review the implementation or impact of these statutory changes due to the June 2023 data incident that limited the data available for our review to pre-Spring 2022. The following legislation made changes to transfer credit requirements that were not yet in place by Spring 2022:

- **House Bill 20-1002 – College Credit for Work Experience.** Effective July 2020, the General Assembly directed the Commission to work with its General Education Council to create a plan to award college credit through GT Pathways or statewide transfer agreement courses for work-related experience [Section 23-5-145.5(3)(a), C.R.S.]. The Commission adopted a plan in December 2021 to implement this requirement. However, the Department stated that this plan has not yet been implemented since it could cost around \$7 million and funding has not yet been secured to support the efforts.
- **Senate Bill 24-164 – Institution of Higher Education Transparency Requirements.** Effective May 2024, the bill adds new requirements to ensure the transfer and applicability of GT Pathways courses toward students' degree paths. These new requirements include that [Section 23-1-108.5(5), C.R.S.]:
  - GT Pathways courses are automatically transferable and applicable to the student's declared major but, if the credits cannot be applied to a student's major, they must be used to fulfill general elective requirements.
  - If a student changes majors, the application of transfer credits to the student's new major must be re-evaluated.
  - All courses in the GT Pathway matrix must qualify as the same course for both the originating college where the credit was first earned and the receiving college where a student transfers to, irrespective of the total credits assigned to the course by the colleges.
  - Receiving colleges cannot require students to retake GT Pathways courses regardless of whether the student earned an associate degree prior to transfer.

The bill also added the following rights related to transfer students [Section 23-1-125(1), C.R.S.]:

- Seamless, timely, transparent transfer process. “(i) Students have the right to seamless transfer of courses in the guaranteed transfer pathway matrix, transparency in the process for transferring credits, a timely response on applications for transferring credits, and transparency in how and why a credit is accepted or rejected by an institution and how and why a credit is or is not applied toward degree requirements;”
- Appeal rights for denied transfer credit. “(j) Students have the right to appeal an institution’s failure to accept the student’s request for transfer credit; and”
- Know what work and prior learning experience can receive college credit. “(k) Students have the right to know what work-related experiences or prior learning opportunities are awarded postsecondary academic credit at the institution in which the student is enrolled, pursuant to section 23-5-145.5.”

Further, the bill granted the Department authority to bring enforcement actions against colleges for violations of GT Pathways requirements and to set up an appeals process for transfer students to contest when colleges deny students credit for GT Pathways courses [Section 23-1-108.5(8), C.R.S.].

- **House Bill 25-1038 – Postsecondary Credit Transfer Website.** Effective August 2025, the law requires, subject to available appropriations, the Department to provide information in an online data platform to current and prospective students on which credits and courses, work-related experiences, and prior learning opportunities are transferable across colleges, starting with Fall 2023 going forward. The law makes it optional for colleges to provide information to the Department to populate the data platform, and this optional data is expected to be submitted on or before January 1, 2026 [Section 23-1-125.5(3)(a), C.R.S.]. The Department plans to use an \$874,000 grant from the Statewide Internet Portal Authority [Section 24-37.7-102, C.R.S.] to create, design, and develop the online data platform. At the end of July 2025, the Department reported that it launched the first phase of this data platform, allowing students to search for GT Pathways courses by category and institution and credits for specific prior learning assessment exams (i.e., DANTES Subject Standardized Test (DSST), AP, and IB), as well as help students find information on statewide transfer agreements and credit for college-level learning acquired while in the military.

## Audit Purpose, Scope, and Methodology

We conducted this performance audit pursuant to Section 2-3-108, C.R.S., which requires the State Auditor to conduct a special audit requested by a member of the General Assembly or the Governor, when approved by a majority vote of the Legislative Audit Committee. The Legislative Audit Committee approved this audit in response to a legislative request, which expressed concerns about whether the transfer credit processes outlined in statute were realizing intended outcomes for students in the areas of statewide transfer agreements, GT Pathways, and college-level learning

acquired during military service. The Office of the State Auditor (OSA) performed its audit work from October 2024 through September 2025. We appreciate the cooperation and assistance provided by the Commission and the Department during this audit.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The key objectives of the audit were to evaluate whether statewide transfer agreements and the GT Pathways system are working as designed and whether students receive appropriate college credit for their college-level learning acquired while in the military.

To accomplish our audit objectives, we performed the following audit work:

- Reviewed state statute, legislative history, Commission policies, and Department reports and resources related to the transfer of college credits under statewide transfer agreements and the GT Pathways guarantee transfer system, and awarding of credit for college-level learning acquired while in the military.
- Analyzed Department SURDS data from Fall 2016 through Spring 2022 on students' enrollment in, and transfers across, Colorado colleges, course credits earned before and after transfer, and degrees awarded before and after transfer. Our review period allowed us to analyze students' associate and bachelor's degree graduation outcomes. For example, for students who earned an associate degree with designation in Spring 2019, we could assess if they subsequently transferred to a 4-year college and completed coursework for a bachelor's degree by Spring 2022.
- Assessed the transfer of credits for a selection of 51 students who completed an associate degree with designation as part of a statewide transfer agreement in Spring 2019 and subsequently transferred to a Colorado public 4-year college between Fall 2019 and Fall 2020. The assessment included collecting information from each of the eight receiving colleges represented in the selection about which of the selected students' course credits they accepted in transfer and reviewing Department resources related to statewide transfer agreements.
- Assessed the transfer to GT Pathways course credits for a selection of 60 students who completed one or more GT Pathways courses before transferring into a Colorado public college between Fall 2019 and Fall 2020. The assessment included collecting information from each of the 20 receiving colleges represented in the selection about which of the selected students' GT Pathways course credits they accepted in transfer and reviewing Department resources related to the GT Pathways guarantee transfer system.
- Assessed the credit transfer for college-level learning acquired while in the military for a selection of 53 students with military experience who enrolled or transferred in a Colorado public college in Fall 2021. The assessment included collecting information from each of the eight receiving

colleges represented in the selection about the military course credits the colleges accepted in transfer and whether the applicable military experiences were eligible for GT Pathways credit. The assessment also included review of Department resources related to military prior learning assessments; the American Council on Education (ACE) Military Guide, which provides recommended college credit equivalencies for military experiences and occupations; and resources available from the U.S. Department of Defense about military transcripts.

- Interviewed Department staff who maintain the Department’s SURDS data and administer the State’s credit transfer systems, and stakeholders representing education policy interests, the Colorado Community College System, military students, and students.

We relied on the following targeted selections to support our work:

- A selection of 51 of the 353 students who earned an associate degree with designation under a statewide transfer agreement in Spring 2019 and subsequently transferred to a 4-year program under a statewide transfer agreement in the same degree path between Fall 2019 and Fall 2020. The selection included all 23 students who were not enrolled with junior status when they transferred to a 4-year college, when enrolling with junior status under a statewide transfer agreement is normally expected; all 9 students who were enrolled with junior status and awarded a bachelor’s degree and earned 75 or more credits at their 4-year college without earning dual degrees, when needing only about 60 credits at the 4-year college is normally expected under a statewide transfer agreement; and a random selection of 19 of the 89 students who were enrolled with junior status and had not completed their bachelor’s degree as of Spring 2022.
- A random selection of 60 of the 1,869 students who enrolled for the first time at a Colorado public college in Fall 2018, took at least one GT Pathways course, and then transferred to another Colorado public college between Fall 2019 and Fall 2020. The selection included 20 of the 170 students who transferred from a 2-year college to another 2-year college, 20 of the 734 students who transferred from a 2-year college to a 4-year college, and 20 of the 965 students who transferred from a 4-year college to another 4-year college.
- A random selection of 65 of the 672 students that colleges indicated in SURDS as having military experience who first enrolled or transferred into a Colorado public college in Fall 2021. The selection included 5 of the 411 first-time enrollees randomly selected from each of the top eight colleges with the highest population of those students (40 first-time enrollees selected in total) and 5 of the 261 transfer student randomly selected from each of the top five colleges with the highest population of those military transfer students (25 transfer students selected in total).

Exhibit 1.2 shows the number of students selected by college for each of the audit’s areas of review.

**Exhibit 1.2**  
**Number of Students Selected for Each of the**  
**Audit's Areas of Review, by College**

College Name	Number of Selected Students			
	Statewide Transfer Agreements	GT Pathways	College Credit for Military Experience	Total Students Selected for Audit Review
Adams State University	—	1	—	1
Aims Community College	—	1	5	6
Arapahoe Community College	—	3	—	3
Colorado Mesa University	—	1	5	6
Colorado Mountain College	—	1	—	1
Colorado School of Mines	—	2	—	2
Colorado State University (CSU)	1	3	10	14
Colorado State University (CSU) Pueblo	3	3	—	6
Community College of Aurora	—	1	—	1
Colorado State University (CSU) Global	—	1	—	1
Front Range Community College	—	4	—	4
Lamar Community College	—	1	—	1
Metropolitan State University of Denver (MSU Denver)	18	11	10	39
Otero College	—	1	—	1
Pikes Peak State College	—	3	5	8
Red Rocks Community College	—	3	—	3
University of Colorado Boulder (CU Boulder)	4	10	10	24
University of Colorado Colorado Springs (UCCS)	14	5	10	29
University of Colorado Denver (CU Denver)	6	2	10	18
University of Northern Colorado (UNC)	4	3	—	7
Western Colorado University	1	—	—	1
<b>Grand Total</b>	<b>51</b>	<b>60</b>	<b>65</b>	<b>176</b>

Source: Results of the Office of the State Auditor's selection of students for review based on analysis of the Department of Higher Education's Student Unit Record Data System (SURDS) data, Fall 2016 through Spring 2022.

These targeted selections are valid for assessing whether statewide transfer agreements and the GT Pathways system are working as designed and whether students receive appropriate college credit for their college-level learning acquired while in the military, and, along with the other audit work performed, provides sufficient, reliable evidence as the basis for our findings, conclusions, and recommendations.

As required by auditing standards, we planned our audit work to assess the effectiveness of those internal controls that were significant to our audit objectives. Details about the audit work supporting our findings and conclusions, including any deficiencies in internal control that were significant to our audit objectives, are described in the remainder of this report.

A draft of this report was reviewed by the Commission and the Department. Obtaining the views of responsible officials is an important part of the OSA's commitment to ensuring that the report is accurate, complete, and objective. The OSA was solely responsible for determining whether and how to revise the report, if appropriate, based on the Commission's and the Department's comments. The written responses to the recommendations and the related implementation dates were the sole responsibility of the Commission and the Department.

# Chapter 2

## Higher Education Transfer Credits

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Credit mobility, or the ability of students to successfully transfer college credits between institutions, can be a strategy for helping students successfully complete their higher education. For example, according to a 2022 report published jointly by the Department of Higher Education (Department) and the Department of Education, Colorado has seen sustained increases over the last decade in the number of students participating in dual enrollment programs to earn college credit in high school, which is part of the State’s “various strategies to...cultivate seamless...pathways to increase credential completion.” The strategy of having Colorado students start earning college credit in high school to improve credential attainment, such as associate and bachelor’s degrees, requires those credits to easily transfer as students pursue their higher education. Beyond the mobility of college credits earned in high school, the option to transfer between colleges can be a crucial strategy for students to save money and time on their way to achieving their higher education goals. When the transfer process works well, it can benefit many students in helping them to complete their higher education.

Our audit work focused on three methods established in statute to help students have credit mobility during their postsecondary education: statewide transfer agreements [Section 23-1-108(7), C.R.S.], Guaranteed Transfer (GT) Pathways [Sections 23-1-108.5 and 23-1-125(3), C.R.S.], and credit for college-level learning acquired while in the military [Section 23-5-145, C.R.S.]. The timeframe of our work generally spanned from Fall 2016 to Spring 2022, using the most recent data available from the Department. Through our audit work, we found:

- Statewide transfer agreements generally worked as designed for the students we reviewed, where most participating students received the appropriate number of transfer credits and were enrolled at their 4-year college with junior status after receiving their associate degree. However, we found instances of receiving 4-year colleges not accepting credits that the students had previously transferred into their 2-year colleges. We also found that students did not always submit their transcripts when they transferred to their 4-year colleges and, as a result, did not receive full credit for their associate degree coursework.
- GT Pathways system worked as designed for more than three-fourths of the transfer students we reviewed, where the receiving college awarded credit for all eligible GT Pathways courses, and applied that credit to general education requirements. However, we found instances of problems for students transferring between 2-year colleges, where the receiving 2-year college did not accept or correctly apply eligible credits to general education requirements. We also found instances of students not receiving GT Pathways credits in transfer because they did not provide their transcripts to the receiving college.

- For students with military experience, when they provided their military transcripts to their college for evaluation, the college generally awarded at least some credit for the student's college-level learning acquired while in the military. However, we identified a number of areas where colleges employ inconsistent methods for evaluating students' military experience.

Of the 176 students reviewed, we identified 23 students (13 percent) who submitted transcripts to their receiving college but experienced problems transferring their credits, and we identified 37 students (21 percent) who lost credit due to the student not submitting their transcripts.

The rest of this chapter provides details on these results.

## Finding 1 – Statewide Transfer Agreements

Since 1983, the General Assembly has required the Colorado Commission on Higher Education (Commission) to establish and enforce a system for students who are transferring from 2-year colleges to 4-year colleges [Section 23-1-108(7)(a), C.R.S.]. Since 2010, statute has required the Commission to formalize this process through statewide transfer agreements. As the Commission's staff, the Department helps the Commission oversee the statewide transfer agreement process. The Department defines statewide transfer agreements as "pathways for students to earn an associate degree, followed by a bachelor's degree, in a given discipline or program area." These agreements, which are approved by the Commission, are between Colorado public 2-year and 4-year colleges, allowing students to earn an associate degree—called a degree with designation—at a 2-year college, and then transfer and enroll into a 4-year college in the same degree path with status as a junior. Currently, there are 38 agreements for 38 different degree programs (e.g., Chemistry, English, and Communication). Participation in the agreements is voluntary for colleges. Colleges can choose which agreements they participate in depending on the degree programs they offer, and most colleges are part of multiple agreements. Colorado School of Mines is the only one of Colorado's public colleges that is not party to any statewide transfer agreements due to its engineering role and mission, according to the Department. The Department publishes each agreement on its website. Each agreement lists each participating 2-year and 4-year college and the curriculum students should follow while pursuing their associate degree with designation at their 2-year college.

The creation of statewide transfer agreements begins within the Commission's General Education (GE) Council, which is required to be made up of representatives from each of the higher education governing boards and each of the 4-year colleges, a representative sample of the 2-year colleges, and a representative of the Commission [Section 23-1-108.5(3)(a), C.R.S.]. The GE Council makes recommendations on statewide transfer agreements to the Commission for approval. For example, the GE Council recommended the creation of Computer Science and Dance statewide transfer agreements in 2020. The GE Council acts as institution liaisons to assist the Department in creating the terms of the agreements, including the required courses and number of electives students must pass at their 2-year college to earn their associate degree with designation and the requirement that 4-year colleges must accept those courses in transfer [Commission Policy, Section I, Part L, 5.06.06]. The GE Council is responsible for assisting the Department in reviewing and revising statewide transfer agreements at least every 5 years [Commission Policy, Section I, Part L, 5.06.07]. Statewide

transfer agreements do not have a specified end date; however, if a 2-year or 4-year college discontinues a program that is part of a statewide transfer agreement, the agreement may sunset if no other college offers that program.

In the event of a dispute in relation to a statewide transfer agreement, statute provides the Commission with “final authority” to resolve the dispute [Section 23-1-108(7)(a), C.R.S.]. Under Commission policy, students can initiate complaints related to statewide transfer agreements, which first requires students to exhaust all resolution options with their colleges before submitting a formal complaint and detailed documentation to the Department [Commission Policy, Section I, Part T, 5.01]. Commission policy then directs the Department to “facilitate an expeditious review and resolution” of any students’ statewide transfer agreement complaints submitted to the Department [Commission Policy, Section I, Part L, 10.00]. The GE Council acts as institution liaisons to provide guidance to the Department on the resolution of transfer disputes [Commission Policy, Section I, Part L, 5.06.06]. Department staff reported that it received an average of zero to two student-initiated complaints per year, total, about transfer credits, indicating that students infrequently initiate complaints with the Department.

## **What audit work was performed and what was the purpose?**

We reviewed statutes and Commission policies pertaining to statewide transfer agreements. We interviewed stakeholders with interest in students earning degrees relevant to in-demand Colorado jobs, representatives of the Colorado Community College System, and a student group to understand their familiarity and experience with statewide transfer agreements.

Using the Department’s Student Unit Record Data System (SURDS), the official source of data for public postsecondary education in Colorado, we analyzed degree completion and enrollment data from Spring 2019 through Fall 2020 to identify the 830 students who earned an associate degree with designation under a statewide transfer agreement in Spring 2019 and the 353 (43 percent) of those students who subsequently transferred to a 4-year program under a statewide transfer agreement in the same degree path between Fall 2019 and Fall 2020.

We selected for review 51 students out of the 353 students (14 percent) who transferred to a 4-year college after earning their associate degree with designation. These 51 students fell into one of three risk categories that could indicate problems with statewide transfer agreements, and included:

1. All 23 students who were not enrolled with junior status when they transferred to a 4-year college.
2. All 9 students who were enrolled with junior status and awarded a bachelor’s degree, but earned 75 or more credits at their 4-year college, none of whom earned dual degrees. We would have expected to see these students earn a bachelor’s degree within about 60 credit hours at a 4-year college, assuming they took about 30 credits per year, since a bachelor’s degree typically requires 120 credits.

3. A random selection of 19 of the 89 students (21 percent) who were enrolled with junior status and had not completed their bachelor's degree as of Spring 2022.

Exhibit 2.1 shows the total number of students we identified in our selection and the 4-year receiving colleges that they attended.

### Exhibit 2.1

#### Number of Students Selected for Each of the Audit's Areas of Review, by College

College Name	Number of Selected Students
Colorado State University (CSU)	1
Colorado State University (CSU) Pueblo	3
Metropolitan State University of Denver (MSU Denver)	18
University of Colorado (CU) Boulder	4
University of Colorado – Colorado Springs (UCCS)	14
University of Colorado (CU) Denver	6
University of Northern Colorado (UNC)	4
Western Colorado University	1
<b>Total</b>	<b>51</b>

Source: Results of the Office of the State Auditor's selection of students for review based on analysis of the Department of Higher Education's Student Unit Record Data System (SURDS) data.

For each of the 51 selected students, we requested transfer information from the students' respective receiving 4-year colleges. From each of these eight receiving colleges, we collected information about which of the selected students' course credits they accepted in transfer.

Additionally, we analyzed SURDS degree completion and enrollment data from Spring 2019 through Spring 2022 to identify the graduation outcomes of students who transferred to a 4-year college after earning their associate degree and the graduation outcomes of non-transfer students who remained at the same 4-year college throughout their undergraduate education and who were sophomores in Spring 2019, which is the same cohort as the transfer students in our selection.

The purpose of our work was to determine if statewide transfer agreements are working as designed, meaning participating students received the appropriate number of transfer credits.

## How were the results of the audit work measured?

**Participating 4-year colleges must adhere to statutory requirements governing statewide transfer agreements.** When a student earns an associate degree with designation under a statewide transfer agreement and is admitted to a 4-year college participating in that statewide transfer agreement, the receiving 4-year college must follow these requirements:

- **Accept associate degree coursework in transfer and enroll the student with junior status.** Section 23-1-108(7)(a), C.R.S., requires statewide transfer agreements to “include provisions under which state institutions of higher education shall accept all credit hours of acceptable course work for automatic transfer from an associate of arts, associate of applied science, or associate of science degree program in another state institution of higher education in Colorado.” All of the statewide transfer agreements applicable to our review period included these provisions; listed the courses that were required for the associate degree with designation’s prescribed curriculum; and specified that in order for credits to be acceptable for transfer, the student must have earned a C-minus grade or higher in the course. Generally, the agreements outlined 60 hours of coursework required for earning the associate degree with designation, with the exception of two agreements from our review period that required 61 and 63 credits, respectively. All of the students we selected for review were participating in 60-credit hour statewide transfer agreements.

Additionally, Section 23-1-108(7)(b)(I), C.R.S., requires that “A student who completes an associate of arts, associate of applied science, or associate of science degree that is the subject of a statewide degree transfer agreement and who transfers from the state institution of higher education that awarded the degree to a four-year state institution of higher education shall, if admitted, be enrolled with junior status.”

- **Cannot require additional general education or lower-division courses that are not required of non-transfer students.** General education requirements represent a specific set or type of courses that each student must take in order to earn a degree. These courses are lower-division courses, signified by the course numbers either in the 100 or 200 course range, or the 1000 or 2000 course range, and may differ between different degree programs. Section 23-1-108(7)(b)(II)(A), C.R.S., requires that, “A state institution of higher education that admits as a junior a student who holds an associate of arts degree, associate of applied science degree, or associate of science degree that is the subject of a statewide degree transfer agreement shall not require the student to complete any additional courses to fulfill general education requirements.” However, colleges may require students transferring under statewide transfer agreements to take additional general education or lower-division courses if those courses do not end up requiring statewide transfer agreement students to take more courses and take more time to complete a degree than their non-transfer peers [Section 23-1-108(7)(b)(II)(A), C.R.S.]. These provisions generally allow students to “Complete the bachelor’s degree in no more than 60 additional credits at the receiving four-year institution (for a total of 120 credits)” where the student completes 60 credits at their 2-year college as part of earning their associate degree with designation, and has only 60 more credits at a 4-year college to earn a bachelor’s degree in the same degree path, except where the degree program has received a waiver from the Commission to exceed 120 credits [Commission Policy, Section I, Part L, 8.02.03.].

**Students are responsible for providing the required documentation to successfully transfer their credits earned under a statewide transfer agreement.** Provisions of the statewide transfer agreements include that, “Students must meet all admission and application requirements at the receiving institution **including the submission of all required documentation by stated**

**deadlines”** [emphasis added] and that students are advised to consult with the Office of Admissions at the college to which they intend to transfer. All of the statewide transfer agreements applicable to our review period included these provisions.

## What problems did the audit work identify?

Overall, we found that statewide transfer agreements generally worked as designed for the students we reviewed, where most participating students we reviewed received the appropriate number of transfer credits. We did not find concerns related to colleges requiring statewide transfer agreement students to take additional general education or lower-division courses that were not otherwise required of non-transfer students in the same degree path. Each of the eight colleges in our review reported that none of the selected students were required to take general education or lower-division courses that were not required of their non-transfer peers, and we did not find concerns in this area. In addition, we did not find concerns related to statewide transfer agreement students being able to graduate with just 60 additional credits at their 4-year college. We found that 3 of the 9 students who earned 75 or more credits at their 4-year college were also seeking a licensure, which explained the additional credits, and for the other 6 students, we did not identify any concerns that indicated their credit hours in excess of 60 credits was due to colleges requiring transfer students to take courses that were not required of non-transfer students.

However, we did find that receiving 4-year colleges did not always accept all coursework and enroll students with junior status, and students did not always submit their transcripts to receive full credit. For 13 of the 51 selected students we reviewed (25 percent), the 4-year colleges did not accept all of their associate degree credits in transfer or enroll them with junior status; we found two types of problems for these 13 students’ transfers, each of whom submitted their transcripts upon transfer to their 4-year colleges. An additional 3 of the 51 selected students we reviewed (6 percent) lost credit due to not submitting their final transcripts. We outline these issues below.

**For 8 students, their 4-year colleges did not accept a total of 32 credits that the students had previously transferred into their 2-year colleges.** That is, these students had received prior learning assessment (PLA) credits for PLA exams (e.g., credit awarded for Advanced Placement (AP) exams and College-Level Examination Program (CLEP) exams), credit for college-level learning awarded on students’ Joint Services Transcripts (JST), and credits awarded by other Colorado public colleges, an out-of-state college, or a foreign university that their 2-year colleges had accepted in transfer. The 2-year colleges had applied these credits to the students’ associate degree with designation coursework requirements. None of these students were enrolled with a junior status at their receiving 4-year college because the receiving 4-year college did not accept the transfer credits awarded by the student’s 2-year college. These 8 students lost between 2 and 12 credits each in transferring to the 4-year college.

While these credits were listed on the students’ 2-year college transcripts and their transcripts showed they earned an associate degree with designation, the receiving 4-year colleges told us they denied these credits for seven of the students because the students did not submit supporting or underlying documentation related to these prior credits. For example, one student earned a History

degree with designation by earning 58 credits at Front Range Community College and transferring in 5 credits from their JST, for a total of 63 credits. When the student transferred to the University of Northern Colorado (UNC), the college accepted only 58 credits, instead of the full 63 credits, because the student did not submit their JST.

In addition to not receiving the underlying documentation, the receiving 4-year colleges reported other reasons for why they did not accept PLA credits. For example, UCCS and CU Denver told us that because their student's PLA exam scores were not on their transcripts, the colleges could not award the students credit. CSU Pueblo reported that it did not accept a student's PLA credits because Commission policy regarding the transfer of PLA credits was not in effect in Fall 2019, which is when the student transferred; however, we verified that the Commission's policy did require the acceptance of PLA credits as of May 2018 and CSU Pueblo should have accepted this student's PLA credits.

For the eighth student, the originating 2-year college (Community College of Aurora) accepted 12 transfer credits from a foreign university to meet the student's statewide transfer agreement requirements (i.e., two economics courses, a business course, and a public speaking course), but the receiving 4-year college (CU Denver) reviewed the student's foreign university transcript and denied the transfer of those credits, concluding that the 12 credits were not academic in nature.

The Department reported that if these courses were taken as part of the associate degree with designation and met requirements for a 60-hour degree with designation, they should have transferred to the 4-year institutions. However, the Department also told us that, although the colleges need to honor the transfer agreements, they can require students to submit the underlying documentation for PLA credits.

**For 5 students, their receiving 4-year colleges did not accept a total of 13 credits because they determined that one of their courses was ineligible for automatic transfer.** For each of these students, their receiving 4-year colleges (MSU Denver and CSU Pueblo) did not enroll the students with junior status because the colleges did not accept one of each of the students' 3-credit courses that should have transferred under the statewide transfer agreements, which led to students transferring less than the guaranteed 60 credits. Four of the students were at MSU Denver—two students had credits denied for an accounting course (ACC 101) completed at Front Range Community College, that was taken as part of both students' elective credits required by the statewide transfer agreement, and two students had an advanced academic achievement course denied, which is a college preparation course that the students took as one of their elective credits at Community College of Denver and Arapahoe Community College, respectively, required under the statewide transfer agreement. MSU Denver told us that previous faculty concluded that the denied courses did not align with its curriculum and deemed them non-transferable. The remaining student was a Psychology student at CSU Pueblo and they had an English special topics course taken at Pueblo Community College denied that the student completed as an elective required for their degree with designation. CSU Pueblo told us that the student was required to submit a syllabus for the course to be evaluated for transfer, but the student never submitted the syllabus. According to the Department, 4-year colleges must automatically accept all credit hours of acceptable coursework

that were applied toward the requirements for the degree with designation, including the elective courses, and a review of the syllabus should not have been necessary in order for the student to receive the credit. The Department went on to say that CSU Pueblo should have transferred the course and counted it toward the student's junior standing if the course was included on the student's degree with designation transcript as part of the 60-credits. Both MSU Denver and CSU Pueblo told us it would help if there was more clarity about how elective credits should be accepted under statewide transfer agreements.

**For 3 students, their receiving 4-year colleges did not accept an estimated 41 credits in total due to either the students not submitting final transcripts to the receiving college or administrative error.** One of these students was not enrolled with junior status upon transfer because they did not submit their final transcript to the receiving 4-year college (MSU Denver). MSU Denver accepted 57 credits in transfer, and the student lost at least 3 credits, as a result of not reporting successful completion of their courses that they needed to complete to obtain their 60-credit associate's degree with designation. For another student, before they attended their 2-year college (Red Rocks Community College), they first enrolled at their 4-year college (UNC), and later transferred to attend their 2-year college to earn their associate degree with designation, and then transferred back to their 4-year college. This student did not submit their final, 2-year college transcript to their 4-year college, leading to the student not receiving credit from the 4-year college for all courses taken as part of their associate degree with designation. Since the receiving 4-year colleges (MSU Denver and UNC) did not receive the final associate degree transcript for these students, it is not clear if the students earned a C-minus grade or above for all their associate degree courses. However, based on the number of credits that the colleges accepted from students' in-progress transcripts, we can estimate that these students lost 3 and 31 credits, respectively.

The 4-year colleges explained to us that students often submit applications, along with their in-progress transcripts, a year prior to enrollment. However, if students do not remember to provide their final, official associate degree transcript to the 4-year college prior to the start of their bachelor's degree program, the 4-year colleges will enroll the student based on their in-progress associate degree transcript and will not factor any of their in-progress courses into the student's enrollment status. The Department told us that its expectation is that colleges "should have procedures for identifying students who have missing documents, follow up to request the missing information, and set reasonable deadlines for their submission" and that while not a requirement of policy or statute, the Department "expects institutions to maintain clear and equitable practices for following up with enrolled students who have not submitted final transfer transcripts." For the students who did not submit a final transcript, the receiving colleges (MSU Denver and UNC) reported that they have a transcript request process that includes sending reminder e-mails to students to submit their final transcripts.

For the third student, the college (UCCS) told us the denial of a 3-credit English course taken at Pikes Peak State College was due to an administrative error, where the course was missed by college staff during the transfer credit evaluation process. While UCCS was not aware of this error until we identified it, the student was able to graduate in Fall 2020 under the statewide transfer agreement.

## Why did these problems occur?

### **The Department does not currently monitor participation in statewide transfer agreements.**

As part of the Department's efforts to oversee statewide transfer agreements, up until 2023, the Department annually analyzed and created an internal report on the number of students who earned an associate degree with designation and subsequently earned a bachelor's degree, the results of which staff shared with the GE Council. The Department stopped this analysis and reporting in 2023 due to the data incident in June 2023 that impacted the Department's SURDS data collection. Resuming its internal analysis and reporting, along with developing additional analysis requested by the Commission, could provide useful information on students' use of statewide transfer agreements.

### **Commission policy is unclear as to whether colleges can accept credits from statewide transfer agreement students without needing all underlying documentation.**

Colleges told us that they denied some students' credits earned under a statewide transfer agreement because the colleges believe they are required to review the original transcript or documentation for certain course credits (e.g., AP or CLEP exam score, transfer credit, PLA credit, course syllabus). The Department told us that it is common practice for colleges to review all transcripts, exam scores, and underlying documentation, even if the student's originating college reviewed this information as part of awarding credit towards students' associate degrees with designation. For some courses, such as the special topics course that CSU Pueblo did not accept in transfer for one student, colleges require students to submit a syllabus in order to evaluate if there is equivalency for that course in the 4-year college's curriculum. However, the statewide transfer agreements published on the Department's website do not mention that students may need to submit syllabi for any courses that the 2-year colleges counted towards the student's elective requirements. In addition, according to Department tables posted online, all colleges participating in statewide transfer agreements award credit for qualifying exam scores for exams like AP; International Baccalaureate (IB); CLEP exams, which are introductory-level college subject exams; and the Department of Defense's DSST exams, which are standardized exams that military service members can take. For example, colleges award credit for DSST scores of 400 or higher. This means that if one college awards a student credit for an exam and lists this on the student's transcript, the other colleges will know that the student earned a passing grade without needing to see underlying documentation.

In our review, we did not find any requirement that colleges must receive all underlying documentation in order to accept credits in transfer. Although Commission policy states that "Receiving institutions may require students to resubmit test scores or other documentation if they transfer" [Commission Policy, Section I, Part X, 3.03], it does not clearly address applicability to statewide transfer agreements, which appear in a different section of the Commission's policies (Commission Policy, Section I, Part L) and for which automatic transfer is emphasized.

The Department and colleges in our review suggested that it is best practice, and one college said it was a requirement of the accrediting entity for all of Colorado's colleges, the Higher Learning Commission, that colleges must obtain all underlying, source documentation for courses in order to accept those courses in transfer. However, we found no evidence that this is best practice and

confirmed with staff at the Higher Learning Commission that no such requirement exists, and that colleges can accept transfer credits that were evaluated by “responsible third parties” without all supporting documentation and without risk of losing their accreditation. As part of this discussion, the accreditor said that state entities like the Commission could define responsible third parties as it deems fit, such as 2-year colleges that are party to statewide transfer agreements. As an example, if a 2-year college evaluates and awards a student’s credits from AP exams, high school concurrent enrollment courses, and transfer credits from other colleges, and lists those credits on the student’s transcript, then receiving 4-year colleges can accept those credits in transfer, without any additional documentation from the student, because the credits have already been evaluated and awarded credit by a responsible third party. In addition, statewide transfer agreements provide additional assurances to 4-year colleges that students’ courses are acceptable for transfer due to the GE Council’s review and the Commission’s approval of all course requirements set within statewide transfer agreements.

Since 1992, the General Assembly has directed the Commission to implement and revise policies to include “minimizing and eliminating the restrictions against automatic transfer of credit hours of acceptable course work” and to ensure statewide transfer agreements “are directed at easing such transfer restrictions” [Section 23-1-108(13)(a)(III), C.R.S.]. Accepting credit from specific responsible third parties for students transferring under statewide transfer agreements could help ease current transfer restrictions and help ensure students receive all guaranteed credits in transfer.

**Statewide transfer agreements lack clarity on accepting elective credits and foreign university credits.** In the statewide transfer agreements that governed the selected students’ degree with designation course requirements, the agreements had general language stating that 4-year colleges must accept all 60 credits in transfer. Some of these agreements required students to take a specific number of elective courses, without specifying the types of courses needed. This means that students can take a variety of courses to earn the required elective requirements, which are guaranteed to transfer under the agreements. The agreements’ language does not appear to give 4-year colleges discretion to deny the transfer of students’ required elective credits. However, we acknowledge that it may be difficult for 4-year colleges to discern on students’ transcripts what course credits the students earned as elective credits under their statewide transfer agreements, since this detail is not listed on students’ transcripts. In addition, while we do not interpret the statewide transfer agreements as allowing 4-year colleges to deny the transfer of students’ credits earned as part of the statewide transfer agreement, we see that 4-year colleges may benefit from clarity on the extent that they can deny the transfer of credits that students originally earned at foreign universities. The Commission should clarify the statewide transfer agreements’ language on the required transfer of electives and foreign university credits, and work with the Department and the GE Council to revise statewide transfer agreements as appropriate.

## Why do these problems matter?

When statewide transfer agreements do not work as expected, it can impact whether students earn a bachelor’s degree and how long it takes them to earn it. Of the 16 students in our review who experienced issues when transferring credits to the 4-year college, only 7 students (44 percent) had

graduated with a bachelor's degree as of Spring 2022—3 years after they earned their associate degree with designation. By comparison, for the 353 total students who earned their degree with designation in Spring 2019 and then transferred under the statewide agreements between Fall 2019 and Fall 2020, 67 percent had earned a bachelor's degree as of Spring 2022, which is the latest SURDS data we had available for those students. The difference in graduation outcomes suggests that when transfer agreements work as designed, they can help students stay on track to earn a bachelor's degree. For the remaining 9 students in our review who experienced transfer issues, 5 were not enrolled in any Colorado public college as of Spring 2022, according to SURDS data; 3 graduated with their bachelor's degrees between Summer 2022 and Spring 2023, according to their colleges; and 1 student was still enrolled at their college as of Fall 2024, according to their college.

Further, we saw that students using statewide transfer agreements may have more success earning their bachelor's degree when compared to students who did all of their coursework at a 4-year college. The Department's SURDS data show that 60 percent of non-transfer students enrolled at 4-year colleges, who were sophomores in Spring 2019, which is the same cohort as the transfer students in our selection, earned a bachelor's degree by Spring 2022. This graduation rate is 7 percentage points lower than the graduation rate of 67 percent for the 353 statewide transfer agreement students from our selection who earned their bachelor's degree by Spring 2022 after obtaining their associate degree with designation in Spring 2019. These results indicate that when statewide transfer agreements work as designed, they may help provide students a reliable pathway to a bachelor's degree.

**With students increasingly earning prior learning credits to obtain their degrees, there is a risk of students losing those credits when transferring under a statewide transfer agreement.**

Colorado is offering more opportunities for students to earn college credits before graduating high school via prior learning credits and concurrent enrollment, and more students are taking advantage of these opportunities. We observed that several students in our selection earned transfer, exam, and prior learning credits awarded by the student's 2-year college as part of their associate degree with designation, though some of these students lost credits in transfer because they did not submit original transcripts or documentation that the receiving 4-year college required. Considering that students are increasingly earning credits outside of their 2-year colleges and prior to starting their associate degree programs, it will be important for the Commission to clarify and provide guidance to colleges on how to transfer these credits to ensure that students do not lose them.

## **Recommendation 1**

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The Department of Higher Education (Department) should help oversee participation in statewide transfer agreements by resuming its analysis and reporting on the number of students who earned an associate degree with designation and subsequently earned a bachelor's degree, and developing a process to regularly provide that information to the Colorado Commission on Higher Education (Commission) and other stakeholders as appropriate. The Department should also work with the Commission to identify any needed additional reporting from the Department's existing data that may be helpful for the Commission's oversight of statewide transfer agreements.

## Response

Department of Higher Education

Agree

Implementation Date: October 2026

The Department agrees with this recommendation. While such reporting is not required by statute or policy, it provides valuable insight into transfer student outcomes and will support efforts to assess and strengthen the statewide transfer system. The Department acknowledges that the cybersecurity attack of 2023 has delayed capacity for non-mandatory reporting; however, it will resume the analysis and seek to expand reporting processes as capacity permits. The Department will solicit feedback from the Commission on developing the report parameters and update them on their progress.

## Recommendation 2

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The Colorado Commission on Higher Education (Commission) should help ensure statewide transfer agreements work as designed and students receive the appropriate credits by:

- A. Revising policy to clarify whether colleges can accept credits in transfer from statewide transfer agreement students without needing all underlying documentation. This could include defining in policy that responsible third parties include colleges participating in statewide transfer agreements and that underlying documentation includes course syllabi, exam scores, and transcripts from other colleges that the originating college used to accept and award transfer credits.
- B. Revising policy to clarify statewide transfer agreements' language on the appropriate transfer of electives and foreign university credits, and work with the Department of Higher Education and the General Education Council to revise statewide transfer agreements as appropriate.
- C. Reviewing the problems the audit identified where students lost credits in transfer that were earned as part of a statewide transfer agreement and then, as appropriate and pursuant to Section 23-1-108(7)(a), C.R.S., which provides the Commission final authority to resolve statewide transfer agreement disputes, work with the students' colleges to ensure the students receive appropriate credits in transfer under the statewide transfer agreement.

## Response

### Colorado Commission on Higher Education

#### A. Agree

Implementation Date: October 2026

The Commission agrees with this recommendation and will update relevant Commission policy, with a specific focus on evaluating Section I, Part X, 3.03 on institutions' ability to require original documentation for awarding credit for prior learning and Section I, Part L on Statewide Transfer Articulation Agreements. To inform this work, Department staff will research current institutional documentation requirements for admission, including the different forms and sources of documentation, and consider circumstances where submission requirements may be waived. This process will involve consultation with multiple advisory groups, including the General Education, Academic, Admissions, and Registrar Councils to develop proposed policy modifications. These recommendations will be discussed with the Commission's Transfer Subcommittee as well as the Student Success and Workforce Alignment Standing Committee. Proposed policy changes will move forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

#### B. Agree

Implementation Date: October 2026

The Commission agrees with this recommendation and will work with the Department and the General Education Council to revise statewide transfer agreements as appropriate. Additionally, the Commission working with the Department and General Education Council will update relevant Commission Policy with a specific focus on evaluating Section I, Part L on Statewide Transfer Articulation Agreements (STAAs). To inform this work, Department staff will research current institutional practices for accepting elective and foreign university credits and consider approaches that balance the necessary guarantees for students earning a Degree with Designation under an STAA with institutional flexibility for ad hoc transfers.

This process will involve consultation with multiple advisory groups, including the General Education, Academic, Admissions, and Registrar Councils to develop proposed policy modifications. These recommendations will be discussed with the Commission's Transfer Subcommittee as well as the Student Success and Workforce Alignment Standing Committee. Proposed policy changes will move forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

#### C. Agree

Implementation Date: January 2026

The Commission agrees with this recommendation and will direct Department staff to follow up with the colleges in which the identified students lost credits in transfer and ensure credit is awarded as appropriate. As reference, CRS 23-1-101 codifies that "express powers and duties are

delegated to a central policy and coordinating board, the Colorado commission on higher education, and the department of higher education is responsible for implementing the duly adopted policies of the Colorado commission on higher education. The ultimate authority and responsibility is expressly reserved to the general assembly, and it is the duty of the Colorado commission on higher education and the department of higher education to implement the policies of the general assembly.” Additionally, CCHE Policy I, Part L provides that “The Commission, with the Colorado Department of Higher Education acting as its staff” shall enforce statewide transfer agreements [CRS 23-1-108(7)(a)]. The Department will be responsible for carrying out this work to ensure Commission policy on transfer credit and prior learning is enforced consistently and equitably across institutions.

## Finding 2 – Guaranteed Transfer Pathways

For many students, the ability to transfer among Colorado’s public colleges is critical to the success of achieving a degree. The State established a system of guaranteed transfer of identified general education courses among Colorado’s public colleges to help students be more flexible as they pursue their higher education. This system is broadly known as Guaranteed Transfer (GT) Pathways, and is composed of two main concepts: the GT Pathways Matrix and the GT Pathways Curriculum.

### GT Pathways Matrix

In pursuit of empowering more students to reach their academic goals, the General Assembly declared the need for a statewide common course catalog—known as the GT Pathways Matrix—to provide the broadest and simplest mechanisms feasible for transferring by creating a Matrix of lower-division courses guaranteed to transfer among all Colorado public colleges [Sections 23-1-108.5(1) and (2), C.R.S.]. The GT Pathways Matrix is “a group of general education courses or lower-division courses” that have “equivalent learning outcomes as the same level of courses offered by another institution” with the intention that, “All credits earned by a student in the guaranteed transfer pathway matrix are automatically transferable” among all Colorado public colleges [Sections 23-1-108.5(2)(e) and 5(a), C.R.S.]. Practically speaking, the GT Pathways Matrix exists as a catalog of approved courses published on the Department’s website that lists the course number and prefix, the institution offering the course, and the corresponding academic category for the course, such as math, communication, history, social and behavioral sciences, etc. To ensure the academic quality of undergraduate programs across the state, courses in the GT Pathways Matrix are intended to be comparable in quality and learning outcomes, as it is expected that these courses will be transferable and applicable to general education core requirements across all Colorado public colleges [Sections 23-1-108.5(1) and (2)(e), and 23-1-125(3), C.R.S.].

The GT Pathways Matrix can be used as a crosswalk for both students and colleges to understand how GT Pathways-designated courses taken at one college can be transferred to meet general education requirements at another college. For example, College Algebra taken at any of the 2-year colleges—with course number MAT 1340—is categorized in the GT Pathways Matrix as Math 1

(GT-MA1) and should transfer in as a GT-MA1 course and satisfy math general education requirements at any Colorado public college.

All Colorado public colleges are required to participate in the GT Pathways Matrix by contributing courses to the catalog of approved GT Pathways courses and automatically accepting GT Pathways courses in transfer [Sections 23-1-108.5(4) and (5), C.R.S.]. In Academic Year 2023-2024, Colorado's 2-year and 4-year public colleges offered a combined total of more than 1,400 approved GT Pathways courses across all colleges, according to Department data.

Since 2001, the Commission has overseen the GT Pathways Matrix through the adoption of policies and guidelines for colleges related to identifying their GT Pathways courses and accepting the transfer of other colleges' GT Pathways courses. The Commission also convenes the statutorily-created GE Council, comprised of subject matter experts, to advise the Commission on the GT Pathways Matrix and courses. Statute requires the GE Council to annually review courses in the GT Pathways Matrix and to recommend to the Commission the courses to be added, removed, or altered within the catalog, to be approved by the Commission [Section 23-1-108.5(3)(c)(II), C.R.S.].

## GT Pathways Curriculum

The General Assembly also provided for the creation of a core course framework—known as the GT Pathways Curriculum—that “defines the general education course guidelines for all public institutions of higher education” and is “designed to ensure that students demonstrate competency in reading, critical thinking, written communication, mathematics, and technology” [Section 23-1-125(3), C.R.S.]. The Commission created a group of general education core courses known as the GT Pathways Curriculum. The GT Pathways Curriculum consists of six content areas corresponding with the GT Pathways Matrix course categories (written communication, math, arts and humanities, history, social and behavioral sciences, and natural and physical sciences), in which students generally need to earn a combined total of at least 31 credit hours across the content areas, depending on the degree program, to fulfill a degree program's general education requirements [Commission Policy, Section I, Part L, 7.00].

Courses in the GT Pathways Matrix are expected to fulfill GT Pathways Curriculum general education course requirements. Statute requires that “the courses identified by the individual institutions as meeting the general education course guidelines shall be included in the [GT Pathways] matrix” [Section 23-1-125(3), C.R.S.], aligning the contents of the GT Pathways Matrix with the State's core general education curriculum. While general education requirements may vary by institution, per Commission policy, the GT Pathways Matrix and GT Pathways Curriculum “takes some of the guesswork out of transfer because gtPathways courses, in which the student earned a C- [grade] or higher, will always transfer and the credit will apply to gtPathways [Curriculum] requirements in every Liberal Arts & Sciences bachelor's degree at every public Colorado institution” [Commission Policy, Section I, Part L, 7.00]. For example, the GT Pathways Curriculum outlines that a student must earn 6 credits in written communication, which can be fulfilled by taking courses listed in two of three possible GT Pathways categories: GT-CO1: Introductory Writing, GT-CO2: Intermediate Writing, or GT-CO3: Advanced Writing. Colleges

indicate in their course catalogs which of their courses align to these specific GT Pathways course categories. Practically speaking, a student could begin their studies at a 2-year college taking GT Pathways courses from this GT Pathways Curriculum, and benefit from automatic transfer of those courses to fulfill the general education requirements of a bachelor's degree program at a 4-year college.

Colorado's system of guaranteed transfer through GT Pathways is relevant to a sizeable population of Colorado's students. For Academic Year 2018, which was the cohort we reviewed as part of the audit, about 35,000 students were enrolled as first-time college students across Colorado's 28 public colleges, according to the Department's SURDS data. About 2,000 (6 percent) of those students later transferred, at some point between Fall 2019 and Fall 2020, to another Colorado public college. Nearly all of those transfer students—about 1,900 of the 2,000 transfer students, or 95 percent—took at least one GT Pathways course before they transferred and most transfer students took at least 8 courses prior to transfer.

Under Senate Bill 24-164, effective May 2024, statute provides the Department “exclusive authority to bring an enforcement action” against a college for violation of GT Pathways requirements [Sections 23-1-108.5(8)(a), (b), and (c), C.R.S.]. The Bill also authorized the Department to create an appeals process for students to initiate an appeal of a college's decision regarding the denial of GT Pathways credit and specified that the Department can promulgate rules related to GT Pathways enforcement actions and the student-initiated appeals process [Sections 23-1-108.5(8)(d) and (e), C.R.S.]. In September 2025, the Department reported that it was in the process of establishing the GT Pathways appeals process and drafting the rules related to GT Pathways enforcement actions and appeals process.

## **What audit work was performed and what was the purpose?**

We researched the history and intent of the State's GT Pathways guaranteed transfer system through a review of statute, Commission policy, the GT Pathways Matrix, and other transfer resources on the Department's website. We interviewed Department staff, stakeholders representing education policy and student groups, and staff from 20 Colorado public colleges.

We analyzed the Department's SURDS enrollment data to identify the 1,869 students who enrolled for the first time at a Colorado public college in Fall 2018, took at least one GT Pathways course, and then transferred to another Colorado public college between Fall 2019 and Fall 2020. From this population of 1,869 students, we stratified the students into three subpopulations based on their transfer path: 2-year college to 2-year college (170 students, or 9 percent), 2-year college to 4-year college (734 students, or 39 percent), and 4-year college to 4-year college (965 students, or 52 percent). We randomly selected 20 students from each of the three transfer paths for a total selection of 60 students who transferred into 20 different colleges.

Exhibit 2.2 shows the total number of students we identified in our selection and the 2-year and 4-year receiving colleges that they attended.

## Exhibit 2.2

### Number of Students Selected for Review of Guaranteed Transfer (GT) Pathways, by College

College Name	Number of Selected Students
Adams State University	1
Aims Community College	1
Arapahoe Community College	3
Colorado Mesa University	1
Colorado Mountain College	1
Colorado School of Mines	2
Colorado State University (CSU)	3
Colorado State University (CSU) Pueblo	3
Community College of Aurora	1
Colorado State University (CSU) Global	1
Front Range Community College	4
Lamar Community College	1
Metropolitan State University of Denver (MSU Denver)	11
Otero College	1
Pikes Peak State College	3
Red Rocks Community College	3
University of Colorado (CU) Boulder	10
University of Colorado Colorado Springs (UCCS)	5
University of Colorado (CU) Denver	2
University of Northern Colorado (UNC)	3
<b>Total</b>	<b>60</b>

Source: Results of the Office of the State Auditor’s selection of students for review based on analysis of the Department of Higher Education’s Student Unit Record Data System (SURDS) data.

For each of the 20 colleges with students in our selection, we reviewed information from the college about whether they awarded credit for the selected students’ GT Pathways courses in transfer, and how they applied that credit to the students’ general education and other academic requirements.

The purpose of our audit work was to determine whether the GT Pathways guaranteed transfer system is working as designed to ensure that students receive transfer credits and they are applied appropriately.

## How were the results of the audit work measured?

**GT Pathways courses should be transferable to all Colorado public colleges and listed on students’ transcripts.** Statute requires that, “All credits earned by a student” in the GT Pathways Matrix “are automatically transferable” among all Colorado public colleges, and that colleges must modify their policies as necessary to accept the transfer of GT Pathways credits [Section 23-1-108.5(5)(a), C.R.S.]. Commission policy specifies that students must earn a C-minus grade or higher

in GT Pathways courses in order for their courses to be guaranteed to transfer, and requires that colleges note on students' transcripts all of the GT Pathways courses accepted in transfer [Commission Policy, Section I, Part L, 7.00].

**GT Pathways courses should be applied to receiving colleges' general education requirements.** Commission policy requires that "each public higher education institution will apply GT Pathways credits to its general education requirements" [Commission Policy, Section I, Part L, 8.01.]. Commission policy differentiates the transfer of credit from the application of credit, where transfer means credits are accepted by the colleges and listed on the student's transcript, but might not count toward any part of the student's degree, while the application of transfer credits means the credit is used to satisfy a component of a student's degree program, such as their general education requirements, and, overall, moves the student closer to completing their degree [Commission Policy, Section I, Part L, 7.00].

## What problems did the audit work identify?

Overall, we found that the State's GT Pathways guaranteed transfer system worked as designed for more than three-fourths of the students we reviewed. Specifically, we found that for 47 of the 60 (78 percent) students we reviewed, their GT Pathways courses transferred as expected, where the receiving college awarded credit for all GT Pathways courses in which the student received an eligible grade of at least C-minus, and applied that credit to general education requirements.

However, we found problems with the transfer of GT Pathways credits for 4 of 60 students (7 percent), all of whom were transferring between 2-year colleges, where the receiving 2-year college did not accept or correctly apply eligible credits to general education requirements. For an additional 9 students (15 percent) transferring to either a 2-year or 4-year college, the students lost GT Pathways credits due to not submitting transcripts to their receiving college. These issues are outlined below; one student is included in two categories.

**Four students lost GT Pathways credits when transferring to another 2-year college.** For these students, all of whom transferred between 2-year colleges, the receiving 2-year colleges denied the transfer of between 3 and 20 credits, totaling 47 credits for all four students, as follows:

- For one student who transferred to Otero College from Pueblo Community College, the receiving college did not accept in transfer or note on the student's transcript 20 of the student's 34 GT Pathways credits (59 percent); the college stated the denied courses were not needed for the student's Associate of Applied Science in Nursing degree path.
- For one student who transferred to Aims Community College from Otero College, the receiving college did not accept in transfer or note on the student's transcript 18 of the student's 29 GT Pathways credits (62 percent); the college stated the denied courses were not needed for the student's Applied Associate of Science in Welding Technology degree path. However, college staff confirmed that they changed their policy in 2022 and now accept all GT Pathways courses, even if they may not apply. The college also did not apply one of the accepted GT Pathways

courses to the student's general education requirements; this problem is outlined in the next section.

- For one student who transferred to Front Range Community College from Aims Community College, the receiving college did not accept in transfer or note on the student's transcript 6 of the student's 12 GT Pathways credits (50 percent); the college stated the denied courses were not needed for the student's Associate of Applied Science in Nursing degree path.
- For another student who transferred to Front Range Community College from Lamar Community College, the receiving college did not accept in transfer or note on the student's transcript 3 of the student's 20 GT Pathways credits (15 percent); the college stated that the student was pursuing an Associate of Arts degree in elementary education through a statewide transfer agreement to later transfer again to a participating 4-year college to complete a bachelor's degree in elementary education. The receiving college (Front Range Community College) concluded that the denied 3-credit course was needed neither for the student's Associate of Arts degree in elementary education at the college, nor would it be needed at the subsequent 4-year college after transfer through the statewide transfer agreement, and so they denied the course.

The three colleges (Aims Community College, Front Range Community College, and Otero College) told us the reason they denied the students' transfer credits is because the courses were not needed for the students' programs of study—each college's policy is to only award transfer credit that is applicable to a student's degree path. However, Commission policy outlines that all GT Pathways credits are required to always transfer and be noted on the student's transcript, regardless of if the credits are applicable to a student's degree program [Commission Policy, Section I, Part L, 7.00].

The Department agreed that these 2-year colleges should have accepted in transfer all of these students' GT Pathways courses, in accordance with Commission policy, and then listed those courses on the students' transcripts, regardless of whether the credits were applicable to the students' current degree paths. Aims Community College and Front Range Community College reported to us that they began accepting all GT Pathways courses, regardless of whether the credits applied to students' degree paths, starting in 2022 and in May 2025, respectively.

**One student did not have an accepted GT Pathways course applied to their receiving 2-year college's general education requirements.** For a student who lost GT Pathways credit as discussed above, the college (Aims Community College) additionally did not apply one of the courses it did accept in transfer, a 4-credit natural and physical sciences course completed at Otero College, to its general education requirements. Specifically, the college accepted in transfer a natural and physical sciences course that qualified for the GT-SC1 GT Pathways course category, but did not apply the course to its GT-SC1 general education requirement needed to complete the student's Applied Associate of Welding Technology degree. The student had not yet earned all of the GT-SC1 courses needed for the degree, so the application of this transferred-in GT Pathways course could have helped the student in completing their degree. The college told us that at the time the student transferred, the college only allowed GT-SC1 courses with certain prefixes to fulfill the welding

technology degree's natural and physical sciences requirements, and the student's transferred-in GT-SC1 GT Pathways course did not match any of the permissible prefixes; however, the college told us this limitation on prefixes is no longer in place.

The Department agreed that this student's 4-credit GT Pathways natural and physical sciences course should have been applied to the degree program's general education requirements, and further stated that an intention of the GT Pathways guaranteed transfer system is that courses will be transferable in the same category, and colleges do not have the authority to not apply courses on the basis of the course prefix.

**Nine students lost GT Pathways credits in transfer because they did not submit their transcripts.** For four of these students who transferred into four different colleges (MSU Denver, Arapahoe Community College, Pikes Peak State College, and Red Rocks Community College), the receiving colleges reported that they did not receive any transcripts for the students and, therefore, did not award credit earned at the students' prior colleges. None of these colleges require students to submit transcripts as part of the admissions process, which could be a reason why students did not submit their transcripts. We can see from the Department's SURDS data that these four students lost a total of 28 GT Pathways credits, where each student earned at their prior colleges between 3 and 16 GT Pathways credit hours with grades of C-minus or higher. For the Arapahoe Community College student, the college told us that while the student enrolled as seeking an Associate of General Studies degree, the student ultimately sought and earned a certificate and was not impacted by the loss of GT Pathways credit transfers.

For the other five students who transferred into five colleges (MSU Denver, Adams State University, CSU, CSU Global, and Front Range Community College), the receiving colleges reported that they did not receive the students' final transcripts, and therefore, did not award credit for one or more GT Pathways courses where the submitted transcripts did not list the courses as being completed. We can see from the Department's SURDS data that these five students lost a total of 23 GT Pathways credits, where each student earned at their prior colleges between 3 and 10 GT Pathways credit hours with grades of C-minus or higher.

The Department reported that it was appropriate for the receiving college to not award GT Pathways transfer credit for courses in which the receiving college had not received the student's transcript showing final completion of the course with the grade obtained. However, when we asked Department staff what measures, if any, colleges should be expected to take to obtain adequate transcript documentation to ensure an effective transfer process, they stated that colleges should take reasonable steps to contact students requesting all transcripts and explain to students the potential impact on their academic goals by failing to provide their final transcripts.

## Why did these problems occur?

Commission policies could provide clearer direction for Colorado's public colleges on accepting and applying credit as part of the GT Pathways guaranteed transfer system, and ensuring transcripts needed for transfer are received, as follows:

**Commission policy does not address the GT Pathways system’s applicability to associate degrees generally, and applied associate degrees specifically.** Statute requires the Commission to adopt policies and guidelines, as necessary, to ensure the transfer of GT Pathways courses among all Colorado public colleges and further compels all Colorado public colleges to have policies to ensure the transferability of GT Pathways courses [Section 23-1-108.5(5)(a), C.R.S.]. We also noted that statute seems to indicate that the GT Pathways guaranteed transfer system applies to associate degrees generally, and therefore should apply to all associate degrees unless the degree program is specifically exempted.

For example, statute defines general education course as a lower-division course that “any degree-seeking student” must complete “in order to obtain an associate’s degree or a bachelor’s degree” and that the GT Pathways Matrix is made up of a “group of general education courses” [Section 23-1-108.5(2)(c) and (2)(e), C.R.S.]. Statute also requires the automatic acceptance of, “All credits earned by a student in the [GT] pathway matrix” by all higher education institutions [Section 23-1-108.5(5)(a), C.R.S.], which includes all 2-year colleges and their offerings of associate degrees. In addition, while statute provides for the Commission to make allowances for bachelor’s degree programs to “have additional degree requirements” beyond the defined general education courses required within the GT Pathways Curriculum, statute does not allow associate degree programs to deviate from the GT Pathways Curriculum [Section 23-1-125(3), C.R.S.].

However, the Commission adopted policies for the transfer and application of GT Pathways courses that primarily only address students attempting to earn a bachelor’s degree, and its policies are not explicit on how GT Pathways courses should be accepted and applied toward associate degrees. For example, Commission policy states that credit for GT Pathways coursework “will always transfer and the credit will apply to gtPathways requirements in every Liberal Arts & Sciences bachelor’s degree at every public Colorado institution” [emphasis added] [Commission Policy, Section I, Part L, 7.00]. The Department confirmed our understanding that Commission policy on GT Pathways applies to associate degrees despite language in the policy never mentioning associate degrees and only explicitly mentioning bachelor’s degrees.

At the same time, Department staff and Colorado Community College System (CCCS) staff have raised doubts about the GT Pathways system’s applicability to applied associate degrees. Specifically, Department staff and CCCS staff have told us that there is limited or sometimes no applicability for GT Pathways courses into applied associate degrees. These degrees are specific to an applied science or technical skill and lead to a specific trade with a primary focus on coursework related to skills, competencies, and hands-on experience that prepares the student to enter a trade right after graduation. However, neither statute nor Commission policy provide for specific exemptions from the GT Pathways system for applied associate degrees.

All four students from our review whose credits were not accepted were in associate degree programs, and three of the students—including the one student whose credit was also not appropriately applied to general education requirements—were specifically in applied associate degree programs, in which the college stated the denied courses were not needed for the student’s degree path. Given that the issues we identified with GT Pathways credits not being accepted or

applied involved students transferring into 2-year colleges to seek associate degrees, the Commission could revise its policies to clarify GT Pathways applicability to these degrees.

**Commission policy could clarify how statutory requirements interact with industry best practice related to noting transfer courses on transcripts when they do not relate to the student's degree path.** Statute requires that all GT Pathways courses automatically transfer to all colleges [Section 23-1-108.5(5)(a), C.R.S.], and Commission policy requires that colleges note on students' transcripts all of the GT Pathways courses accepted in transfer [Commission Policy, Section I, Part L, 7.00.]. However, as part of our audit work, we reviewed the assumed practices set by the Higher Learning Commission, which is an entity that accredits all of Colorado's 2-year and 4-year public colleges. The accreditor's practices state, "The institution refrains from the transcription of credit from other institutions or providers that it will not apply to its own programs" [Higher Learning Commission, Assumed Practices, C.2]. We contacted the Higher Learning Commission, and the accreditor explained that its assumed practices do not necessarily supersede state statute and policies, which means colleges could be confused on how the accreditor's practices interact with state statute and Commission policy.

The three colleges from our review that denied students' GT Pathways credits in transfer told us that students' credits were denied in transfer because it was college policy or procedure to only accept transfer credits that would apply to the student's area of study. This practice would be in line with guidance from the colleges' accrediting body. In addition, staff with CCCS explained to us that 2-year colleges' policies may only allow the transfer of applicable credit to help ensure students do not run the risk of losing access to federal financial aid, where federal financial aid only finances up to 150 percent of the courses needed for a degree program, and will not cover any courses beyond that limit. As part of this discussion, CCCS staff explained that while the 150 percent course limit may affect students seeking associate degrees in some cases, it largely impacts students seeking short-term, non-degree certificate programs. In addition, CCCS staff told us that federal rule changes for financial aid in 2022 now allow students to initiate an appeal in instances a student is at risk of reaching the 150 percent limit on course credits and that many 2-year colleges have been doing away with policies to only transfer in applicable courses as a result of those federal rule changes.

However, not noting GT Pathways courses on students' transcripts, even when not used for a student's current degree path, may lead to unnecessary credit lost if the student changes degree paths or later transfers. The Commission should revise its policies to add guidance on how colleges should accept GT Pathways courses in transfer when the courses are not needed for the student's degree path and provide colleges with clarity on how to navigate instances in which automatic transfer of GT Pathways courses may risk a student's access to federal financial aid as well as how state statute and Commission policies relate to Higher Learning Commission assumed practices.

**Commission policies do not clearly state that GT Pathways courses must be accepted regardless of course prefix.** For the Aims Community College student for whom the college did not apply a GT Pathways course to general education requirements for the student's degree path, college staff told us that the limitation related to which course prefixes were applicable the student's

degree requirements specified in the college's course catalog. The Department told us that their interpretation of GT Pathways transferability and applicability is that courses will transfer and apply to requirements within their designated category, and colleges do not have the authority to not apply GT Pathways courses on the basis of the course prefix. However, Commission policy does not reflect this expectation and colleges could benefit from having this expectation made clear.

**Commission policies do not provide direction to colleges on obtaining transfer students' final transcripts.** Statute instructs the Commission to adopt policies to ensure institutions can guarantee the transferability of GT Pathways courses [Section 23-1-108.5(5)(a), C.R.S.]. While Commission policy charges Colorado's public colleges and their governing boards with developing effective transfer advising systems and implementing policies to ensure the transferability of GT Pathways courses [Commission Policy, Section I, Part L, 5.02 and 5.03], the policy does not provide direction to colleges on obtaining transfer students' final transcripts.

The four colleges that did not receive any transcripts from four students in our selection provided varying responses about their procedures for obtaining transcripts. For example, MSU Denver described how they flag transfer students that have not provided their transcripts in their data system and will send periodic reminders about submitting transcripts. Conversely, Arapahoe Community College, Pikes Peak State College, and Red Rocks Community College stated that they do not require a transcript for enrollment and do not have a specific practice expected of staff in instances where a transfer student has not provided transcripts. Further, as part of our review of statewide transfer agreements, CU Denver and UCCS told us if a student has coursework that is marked as "in progress" on an official transcript, they will place a hold on the student record and notify the student to submit a final transcript.

The Department told us that the variation in procedures by the colleges indicates that this is an area where guidance for colleges could be strengthened. The Commission could provide guidance or requirements for colleges on ways they can improve communication with students about providing transcripts that are needed for them to transfer in credit.

## Why do these problems matter?

**Students may not always benefit from statute's guarantee of credit transfer.** While we found the GT Pathways guaranteed transfer system worked as designed for most of the students we reviewed, the examples we found of students losing GT Pathways credits in transfer indicate that some improvements can be made to ensure colleges uphold statutory guarantees. In general, when students lose credits in transfer, students may experience an increase in the time and costs needed to earn their degrees, or discourage the students from completing their degrees. For example, students could experience negative impacts such as increased costs when they pay to repeat courses or need to extend their time pursuing higher education; running out of financial aid, particularly for aid that has time or credit hour limits; discouragement from completing a degree due to their courses not being acknowledged or the increased cost; and risk of continuing to lose credits as students transfer to other colleges, when their GT Pathways credits are not be noted on their most recent transcript. Additionally, when colleges do not accept and apply GT Pathways courses as guaranteed by statute

and Commission policy, students may not be realizing their right “to know which courses are transferable among the state public” 2-year and 4-year colleges and which courses will “satisfy the students’ degree requirements” [Section 23-1-125(1)(d) and (f), C.R.S.].

Recently, Senate Bill 24-164 emphasized the importance of GT Pathways courses transferring by adding to the Student Bill of Rights,

“Students have the right to seamless transfer of courses in the guaranteed transfer pathway matrix, transparency in the process for transferring credits, a timely response on applications for transferring credits, and transparency in how and why a credit is accepted or rejected by an institution and how and why a credit is or is not applied toward degree requirements” [Section 23-1-125(1)(i), C.R.S.].

In order for all students to experience seamless transfer as part of the GT Pathways system, colleges need to exercise consistent practices in accepting and applying courses as expected in statute.

**Problems with guaranteed transfer between 2-year colleges may especially impact students for whom the Commission and Department are seeking to improve outcomes.** The Commission and the Department have established goals for 2024-2025 to increase credential completions, such as associate degrees, for low-income students and students of color. In our review of student data, we found students who were recipients of the PELL grant, a need-based federal grant for students from a low-income background, made up 41 percent of the students who first-time enrolled in a Colorado 2-year college in Fall 2018 and transferred to another 2-year college in the following 2 years. Students of color further made up 55 percent of this population. These data suggest that transfers between 2-year colleges are a pathway commonly accessed by these two populations for which the Commission and Department are seeking to improve outcomes, and when their credits do not follow them, they may experience more difficulty in completing their higher education.

## Recommendation 3

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The Colorado Commission on Higher Education should ensure the Guaranteed Transfer (GT) Pathways system works as designed and students receive and have applied to their transcripts and degree requirements the appropriate transfer credits by:

- A. Revising policy to clarify the applicability of the GT Pathways system to associate degrees generally, and applied associate degrees specifically.
- B. Revising policy to clarify how colleges should accept GT Pathways courses in transfer when the courses are not needed for the student’s degree path. These policy revisions should include guidance on how to navigate instances in which automatic transfer of GT Pathways courses may risk a student’s access to federal financial aid as well as how state statute and Commission policies relate to Higher Learning Commission assumed practices and any other industry best practices.

- C. Revising policy to provide clearer direction to colleges on how to apply GT Pathways credits in transfer to degree requirements. Policy revisions should address whether colleges have the authority to not award and apply GT Pathways credits based on course prefixes.
- D. Revising policy to provide guidance or requirements on ways colleges can improve communications with students about providing transcripts that are needed for them to transfer in credit.

## Response

### Colorado Commission on Higher Education

#### A. Agree

Implementation Date: October 2026

The Commission agrees with this recommendation and will update relevant Commission Policy within Section I, Part L, 7.00 on General Education and GT Pathways Curriculum to provide clear guidance on the applicability of GT Pathways courses within different associate degree frameworks. To determine policy updates which will explore flexibility within applied science degree general education requirements with maximized portability for students, Department staff will consult with multiple advisory groups, including the General Education, Academic, Admissions, and Registrar Councils in addition to the Colorado Community College System. These recommendations will first be presented to the Commission's Transfer Subcommittee as part of broader efforts to strengthen the statewide transfer system. Any proposed policy changes will require approval by the Student Success and Workforce Alignment Committee before moving forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

#### B. Agree

Implementation Date: October 2026

The Commission agrees with this recommendation and will update relevant Commission Policy within Section I, Part L to provide clear guidance on navigating GT Pathways courses if the course is not applicable to general education, major, or available elective hours for the declared major. Due to the conflict between current statute [Section 23-1-108.5(5)(a), C.R.S.] and Higher Learning Commission assumed practices regarding whether inapplicable credits should be listed on a transcript, Department staff will consult with multiple advisory groups, including the General Education, Academic, and Admissions Councils to determine the best path forward to modify policy or consider proposing a revision to statute with a goal of maximizing financial aid opportunity for students. These recommendations will first be presented to the Commission's Transfer Subcommittee as part of broader efforts to strengthen the statewide transfer system. Any proposed policy changes will require approval by the Student Success and Workforce Alignment Committee before moving forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

C. Agree

Implementation Date: October 2026

The Commission agrees with this recommendation and will update relevant Commission Policy within Section I, Part L, 5.03 Institutional Responsibilities to clearly state that institutions shall accept all courses approved by the General Education (GE) Council for GT Pathways and apply them to the designated content category, regardless of course subject or prefix. Institutions may not limit applicability of GT Pathways courses based on institutional course prefix alignment, provided the course has been approved through the GE Council review process. Department staff will coordinate the proposed policy changes with the GE Council before presenting to the Commission's Transfer Subcommittee as part of broader efforts to strengthen the statewide transfer system. Any proposed policy changes will require approval by the Student Success and Workforce Alignment Committee before moving forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

D. Agree

Implementation Date: October 2026

The Commission agrees with this recommendation and will update relevant Commission Policy with a specific focus on evaluating Section I, Part L. To inform this work, Department staff will research current institutional practices for requiring and promoting submission of transfer transcripts. This will require consultation with multiple advisory groups, including the General Education, Academic, Admissions, and Registrar Councils to develop proposed policy modifications to incorporate specific requirements or other recommended guidance. These recommendations will first be presented to the Commission's Transfer Subcommittee as part of broader efforts to strengthen the statewide transfer system. Any proposed policy changes will require approval by the Student Success and Workforce Alignment Committee before moving forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

## Recommendation 4

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The Department of Higher Education (Department) should ensure the Guaranteed Transfer (GT) Pathways system works as designed and students receive and have applied to their transcripts and degree requirements the appropriate transfer credits. This should include reviewing the problems the audit identified where students lost GT Pathways credits in transfer and, as appropriate and pursuant to Section 23-1-108.5(8), C.R.S., which gives the Department exclusive authority to resolve GT Pathways transfer disputes, work with the students' colleges to ensure the students receive appropriate GT Pathways credits.

## Response

Department of Higher Education

Agree

Implementation Date: January 2026

The Department agrees with this recommendation and will follow up with the students' colleges where issues were identified to both ensure they receive proper credits and that the Commission policy on transfer credit works as designed and students receive course credits as appropriate.

## Finding 3 – College Credit for Military Experience

With several military bases and about 333,000 military veterans, Colorado is home to a sizeable population of individuals with military experience—about 7 percent of the State's population 18 years and older. According to the Department's SURDS data for Fall 2021, which was the timeframe covered by our audit work, about 5,000 students attending public colleges in Colorado had military experience. These students were active duty military, in the military reserves, or veterans.

In 2017, the General Assembly passed House Bill 17-1004, to “ensure an easier pathway to career and financial success for our veterans,” as stated in the bill's legislative declaration. The legislation established a requirement that the governing board of each institution of higher education (college) adopt, make public, and implement a prior learning assessment policy for college-level learning acquired while in the military [Section 23-5-145, C.R.S.]. In the bill's legislative declaration, legislators found and declared that, “The Armed Forces invest taxpayer dollars to provide high-quality education and training to service members”; service members “spend significant time receiving training and education for jobs serving our country”; and, with federal veteran education benefits through the GI Bill generally covering only 36 months of education, “Veterans face an increased risk of poverty and failure to complete their postsecondary education if they are placed in college courses without appropriate recognition of college-level learning acquired while in the military”.

To implement House Bill 17-1004, statute required college governing boards to adopt policies related to awarding credit for military experience [Section 23-5-145(2), C.R.S.], and charged the Department with conducting a one-time review of those policies [Section 23-5-145(4), C.R.S., repealed in 2019].

Some military experience may qualify for GT Pathways credit, and when it does, there are specific ways in which the Department may be involved in ensuring students receive proper credit. Specifically, under Senate Bill 24-164, effective May 2024, statute provides the Department “exclusive authority to bring an enforcement action” against a college for violation of GT Pathways requirements [Sections 23-1-108.5(8)(a), (b), and (c), C.R.S.]. In addition, under Commission policy and the Department's website, students can initiate complaints related to concerns that they are not receiving credits in line with the student bill of rights, which is established in Section 23-1-125(1), C.R.S. The Department's student-initiated complaint process first requires students to exhaust all

resolution options with their colleges before submitting a formal complaint and detailed documentation to the Department [Commission Policy, Section I, Part T, 5.01].

## **What audit work was performed and what was the purpose?**

We reviewed state statute, Commission policies, and legislative history for House Bill 17-1004 related to expectations of colleges to award academic credit for college-level learning acquired while in the military. We reviewed the prior learning assessment documents related to military experience maintained on the Department's website and the American Council on Education (ACE) Military Guide, which provides recommended college credit equivalencies for military experiences and occupations. We interviewed stakeholders from military and student groups to understand students' experiences with receiving credit for their military experience. We also interviewed Department staff and staff from eight public colleges on the methods taken to award students credit for their college-level experience acquired while in the military.

The Department collects data from colleges within its SURDS database about enrolled students' military experience, including if students have military experience themselves or are dependents of active duty military service members. Colleges identify these students using different processes including data from admissions, financial aid, and other methods like students self-identifying as having military experience or when they reach out to the colleges' veteran services offices.

We analyzed the Department's SURDS enrollment data to identify the 411 students with military experience, as indicated in SURDS, who were first-time enrollees in Colorado public colleges in Fall 2021 and randomly selected 5 of these students from each of the top eight colleges with the highest population of those military students. We also identified the 261 students with military experience, as indicated in SURDS, who transferred from a Colorado public college to another Colorado public college in Fall 2021 and randomly selected 5 of these students from each of the top five colleges with the highest population of these military transfer students.

Exhibit 2.3 details the number and type of military students we selected for review from the eight Colorado public colleges.

## Exhibit 2.3

### Number of Students Selected for Review of Credit for Military Experience, by College

College Name	Number of Selected Students Who Were Military First-Time Enrollee Students	Number of Selected Students Who Were Military Transfer Students
Aims Community College	5	—
Colorado Mesa University	5	—
Colorado State University (CSU)	5	5
Metropolitan State University of Denver (MSU Denver)	5	5
Pikes Peak State College	5	—
University of Colorado – Boulder (CU Boulder)	5	5
University of Colorado - Colorado Springs (UCCS)	5	5
University of Colorado - Denver (CU Denver)	5	5
<b>Total</b>	<b>40</b>	<b>25</b>

Source: Results of the Office of the State Auditor’s selection of students for review based on analysis of the Department of Higher Education’s Student Unit Record Data System (SURDS) data.

For each of the eight colleges with students in our selection, we reviewed information from the colleges about whether the students attempted to receive credit for their college-level learning acquired while in the military, and the outcome of if and how the colleges awarded college credit for the military experience. We reviewed whether any of the military experiences reflected on students’ military transcripts qualified for GT Pathways credit according to prior learning assessment materials maintained on the Department’s website. We reviewed the eight colleges’ policies on awarding credit for military experience and the Department’s 2018 review of those policies, which were both required by House Bill 17-1004.

The purpose of our audit work was to determine whether students are receiving appropriate credit at Colorado public colleges for their college-level learning acquired while in the military.

## How were the results of the audit work measured?

Colleges should award credit for college-level learning acquired while in the military. Statute requires colleges to “implement a prior learning assessment policy for awarding academic credit for college-level learning acquired while in the military” that uses “the American Council on Education’s recommendations on the [student’s] joint services transcript, among other factors, to evaluate college-level learning acquired by a student while in the military and, at the discretion of the campus, assign appropriate prior learning assessment credit” [Section 23-5-145(2), C.R.S.]. To document and represent all college-level learning that has been acquired, all enlisted officers, warrant officers, both active and veterans from all Army components, Coast Guard, Marine Corps, and Navy are eligible to receive a Joint Services Transcript (JST). According to the U.S. Department of Defense’s “Joint Services Transcript FAQ” website, a JST “is an academically accepted document approved by the

American Council on Education (ACE) to validate a service members [sic] military occupational experience and training along with the corresponding ACE college credit recommendations.” Through a U.S. Department of Defense contract, ACE is the sole source of information for courses and occupations evaluated for the military. The online ACE Military Guide provides credit recommendations for these evaluated military experiences. For example, the ACE Military Guide recommends 3 lower-division credits in leadership for Marines who completed the Corporals Distance Education Program between June 2012 and October 2024.

College-level learning acquired while in the military may also be demonstrated through other documentation, including:

- **Air Force Transcripts.** Air Force personnel are eligible to receive Community College of the Air Force (CCAF) transcripts, which outline the military education and training a service member received while serving in the Air Force. ACE does not evaluate CCAF transcripts to recommend academic credit for the military education and experience reflected on CCAF transcripts. Instead, colleges can review the content on CCAF transcripts and assess the transferability of the transcribed courses in the same manner they would assess transcripts from any other community college. Neither statute nor Commission policy specifically address how Colorado public colleges should evaluate experience reflected on Air Force students’ CCAF transcripts to determine appropriate academic credit.
- **DD214 Discharge Documentation.** Veterans or any discharged military service members receive a Certificate of Release or Discharge from Active Duty form, otherwise known as the DD Form 214 (DD214), from the U.S. Department of Defense. The DD214 documents various details of military service including the duration of a service member’s active duty, their highest rank, foreign service, and awards and honors received while in the military. Some colleges may request that students submit their DD214s to the college, and the college awards credit based on rank and completion of certain types of service and training from the student’s military experience. Neither statute nor Commission policy address how Colorado public colleges should evaluate experience reflected in a student’s DD214 to determine appropriate academic credit, but some colleges’ prior learning assessment policies address how they will consider DD214s for awarding credit for military experience. For example, CU Denver’s policy allows students who completed basic training to be awarded 9 credits if they reached the rank of E4 and 15 credits if they reached the rank of E5.
- **Exams.** Service members can take a variety of exams while in the military to demonstrate college-level learning, and the scores for such exams taken at military testing centers are listed on the student’s military transcript. Commission policy addresses how credit for such exams should be awarded, as follows:
  - **CLEP.** College-Level Examination Program (CLEP) exams governed by College Board include more than 30 introductory-level college subject exams. Commission policy requires colleges to award at least 3 GT Pathways credits for CLEP exams with at least a score of 50 [Commission Policy, Section I, Part X, 4.01-4.04].

- **DSST.** DANTES (Defense Activity for Non-Traditional Education Support) Subject Standardized Tests (DSST) funded by the U.S. Department of Defense and managed by Prometric, include more than 37 subject exams service members can take. Commission policy requires colleges to award at least 3 GT Pathways credits for DSST exams with at least a score of 400 [Commission Policy, Section I, Part X, 4.01-4.04].
- **DLPT.** Defense Language Proficiency Tests (DLPT) overseen by the military's Defense Language Institute Foreign Language Center are used worldwide by the U.S. Department of Defense to measure proficiency in listening and reading comprehension. Commission policy requires colleges to award students with military experience GT Pathways World Language credit for DLPT exams listed on JSTs "for qualifying scores at ACE recommended cut scores" [Commission Policy, Section I, Part X, 5.02].

**Colleges should award GT Pathways credit for military experience based on military prior learning assessment (PLA) tables posted to the Department's website.** In addition to specific mention of awarding GT Pathways credit for certain exams and corresponding scores as outlined above, Commission policy states, "Military and veteran students shall be awarded GT Pathways credit for military courses and occupations, as designated in tables posted on the Department's website" [Commission Policy, Section I, Part X, 5.01]. In 2018, the Department posted a series of military PLA tables, one for each 2-year and 4-year public college, excluding Colorado School of Mines, that list applicable GT Pathways and elective credits students can be awarded at the applicable college for the student's military courses and occupations, as determined eligible by the college. Each college's military PLA table lists approximately 60 ACE-recommended courses and occupations that translate into applicable GT Pathways courses. For example, one college's (CSU's) military PLA table shows a student can earn 3 GT Pathways communication elective credits in either leadership communication, management, leadership development, or operations management for the U.S. Army's Aviation Captain's Career course (ACE code AR-1405-0271). For the same military course, two other colleges' military PLA tables show a student can earn 3 GT Pathways communication elective credits as either generic elective credits (CU Denver awards credits for course XDEN1999ME) or as arts and science elective credits (CU Boulder awards credits for course ARSC 1999TC). The Colorado School of Mines does not have a military PLA table posted on the Department's website because the college is generally exempt from GT Pathways curriculum requirements due to the nature of their STEM programs. However, Colorado School of Mines may accept GT Pathways credit on a case-by-case basis. Since these military PLA tables only list ACE-recommended courses and occupations, they only apply to JSTs and not CCAF transcripts.

In addition, students who have been awarded GT Pathways credit for their military experience should be able to automatically transfer that credit to another Colorado public college. Specifically, for students transferring between Colorado public colleges, statute requires the colleges to "accept in transfer...prior learning assessment credit awarded for courses with [GT Pathways] designation" [Section 23-5-145(2)(c), C.R.S.].

**The Department should accurately identify military students enrolled in Colorado colleges.** The Department collects information from colleges within SURDS on whether students have no

military experience, have some military experience (e.g., active duty, reserves, veteran), or if they are dependents of military service members. With this data, the Department can fulfill occasional reporting requirements and can provide the Commission with information on the population of college students with military experience, among other uses of the data. Based on best practices outlined within the U.S. Government Accountability's Office's Standards for Internal Control in the Federal Government, which the Office of the State Controller requires the Department to follow, management should obtain relevant data from reliable external sources "that are reasonably free from error and bias and faithfully represent what they purport to represent" [Principle 13.04, U.S. Government Accountability Office, Standards for Internal Control in the Federal Government].

## What problems did the audit work identify?

Overall, we found that when students with military experience provided their military transcripts to their college for evaluation, the college generally awarded at least some credit for the student's military experience. Prior to reviewing students' military experience, we identified that 12 of the 65 selected students (18 percent) that colleges flagged as having military experience in SURDS were actually dependents of military service members, so we removed these students from our review; we discuss this issue at the end of this section. Of the 53 military students we reviewed from eight colleges, 28 students (53 percent) provided some type of military transcript to their college for evaluation: 25 students submitted a JST, 2 students submitted only their DD214s, and 1 student only submitted a CCAF transcript. From the 28 students, 22 of those students (79 percent) received at least some credit for their military experience while the 6 remaining students (21 percent) received no credit for their military experience. The remaining 25 students we reviewed (47 percent) did not submit any military transcript to the college for evaluation, and received no credit for their military experience. We outline observations from our review below.

**Colleges used discretion in awarding ACE-recommended credit.** We reviewed the JSTs from the 25 students who had submitted one to their college. Each JST included one or more courses and occupations with ACE-recommended credit. Colleges awarded at least some credit to most of these students, as follows:

For 4 of these students (16 percent), the colleges (Pikes Peak State College and Colorado Mesa University) awarded credit for all of the ACE-recommended courses (15, 23, 7, and 22 credits, respectively). Colorado Mesa University awarded mostly elective credits and some kinesiology courses that fulfill their physical education requirement. Pikes Peak State College awarded its student a variety of elective credits and some business and management related credits.

For 3 students, the colleges (CU Boulder, Aims Community College, and Pikes Peak State College) evaluated the student's JST, but did not award any credits for their military experience. These 3 students had a collective 86 ACE-recommended college credits that were not awarded by colleges, ranging from 18 to 41 credits per student.

For 13 students, the colleges (CSU, MSU Denver, and Pikes Peak State College) awarded some of the credits from their JSTs in the form of mostly elective credits and credits for courses meeting

physical education requirements. Colleges awarded these students a total of 177 out of 393 credits on their JSTs (45 percent).

Two students who submitted a JST with ACE-recommended credits to their colleges (UCCS and CU Denver) did not complete the college's review process and submit a form indicating that they would like their college to review their JST for credit; another three students submitted a JST with ACE-recommended credits to their colleges (CU Denver, MSU Denver) and had credits awarded based on the students' DD214s, rather than receiving ACE-recommended credit. These issues are discussed in subsequent sections.

When colleges did not accept ACE-recommended credits from students' JSTs, they generally told us that the ACE-recommended credits did not have course equivalencies at their college to match the technical or specialized military learning acquired by students. For example, for a CU Boulder student, the JST only had one course for basic combat training with ACE-recommended credit for first aid and CPR, land navigation, physical fitness, self-defense, and marksmanship. However, the college told us that because there are no applicable course equivalencies at the college in those areas, they did not accept the ACE-recommended credit. We reviewed the 41 ACE-recommended courses denied by the colleges and found no examples where the college should have clearly accepted it; the explanations of the ACE-recommended credits lacking course equivalencies at the college appeared reasonable.

**One college evaluated, but did not award any credit from a student's CCAF.** For one student who earned an Associate of Applied Sciences degree worth 43 credits while serving in the Air Force, as reflected on their CCAF transcript, the college (CU Boulder) awarded no credit for this experience. However, in our review of the Air Force student's CCAF courses that were denied, we noticed the student attended Airman Leadership School and earned credits for three courses focused on leadership, managerial communications, and military studies, all of which are course topics offered by the college. It appears that CU Boulder could have considered these courses for credit based on its academic course offerings. However, we acknowledge that the college is allowed discretion in how it evaluates and awards credit to students. The college told us it did not award credit for the student's military experience because the courses listed on the student's CCAF were too technical and, since they have not been evaluated by ACE, were not GT Pathways-approved courses.

**Two colleges used students' DD214, rather than their JSTs, for awarding credit for military experience.** Two students attending MSU Denver submitted their DD214, without also submitting their JST, and the college awarded applicable elective credit based on the student's military rank as reflected on the student's DD214 (3 and 6 credits, respectively), pursuant to the college's policy. For a third student at MSU Denver, the student submitted both their DD214 and their JST, but the college only awarded credit based on the DD214. Specifically, the student's JST included 27 ACE-recommended credits in total, including more specialized Navy trainings such as in submarine refrigeration maintenance and firefighting, which the college did not accept; the student's engineering major had specific course requirements that the student's ACE-recommended courses

from their JST could not fill. However, the college awarded 15 elective credits based on the student's rank and years of service, as reflected on their DD214, pursuant to the college's policy.

For two students who attended CU Denver, the college awarded 9 and 15 credits, respectively, based on the students' DD214. These students' JSTs included 37 and 67 ACE-recommended credits, respectively, but pursuant to the college's policy, the college did not evaluate each individual course from the students' JSTs, instead awarding credit based on the rank the student achieved based on the students' DD214s and accompanying Military Experience Form that students fill out.

The colleges' approach of awarding credit based on students' DD214s appears to be an efficient way to award credit, since the two colleges' policies outline standard credit awards based on completion of basic training and the rank achieved. However, statute indicates that colleges should use, at a minimum, ACE recommendations based on students' JSTs in determining what credit to award for military experience. Policymakers may wish to consider whether statute should more clearly allow colleges to base their evaluations for awarding credit for military experience on documents other than JSTs, such as DD214s in lieu of JSTs.

**Three colleges did not award credit for exams listed on students' military transcripts because the colleges lacked underlying exam documentation.** Three colleges (CU Denver, CU Boulder, and MSU Denver) denied three students 24 credits total (4, 12, and 8 credits, respectively) for CLEP, DSST, and DLPT exams listed on their JSTs, as follows:

- For the student who transferred from Front Range Community College to CU Denver, the receiving college did not accept prior learning assessment credits earned while in the military, as statute requires. This transfer student's JST listed a passing score for a CLEP math exam that was awarded 4 GT Pathways credits by Front Range Community College. When the student transferred to CU Denver, the student lost these 4 GT Pathways credits in transfer because the college required the student to submit the underlying CLEP exam scores for evaluation, and this did not occur. CU Denver told us that the student had transferred in 2 other GT Pathways math courses, indicating the student did not need the course to earn their degree. However, Commission policy requires that GT Pathways courses "will always transfer" and be listed on students' transcripts, even if the courses do not apply toward students' degrees [Commission Policy, Section I, Part L, 7.00]. The Department told us it believed the colleges exercised appropriate discretion in requiring submission of the student's original exam record outside of the JST documentation.
- For the student attending MSU Denver, the student's JST listed two DLPT exams in a foreign language both with a score of 2, but the JST did not specify if the exam was for reading, listening, or writing in that language. It is not clear whether 2 was a score that qualified the student to receive GT Pathways credit for the exams, since Commission policy does not define what a qualifying "cut score" is. The college did not award the student the 8 possible credits. As part of its response, MSU Denver explained that in the past, its staff was not equipped to request the underlying DLPT exam scores from students or to interpret the ACE guidance for DLPT scores listed on the students' JSTs. The college's processes have since changed so that

there is now a staff member dedicated to military credit evaluation who can follow up with students to request the underlying DLPT exam scores and interpret their scores to award appropriate credit.

- For the student at CU Boulder, who transferred from UCCS, the student's JST listed three CLEP exams and one DSST exam eligible for GT Pathways credit based on earning scores above the Commission's standards, totaling 12 possible credits. However, the college did not award the student any of these credits due to the student not having submitted the accompanying CLEP and DSST exam score documentation. The student's originating college (UCCS) also did not award GT Pathways credits for these exams.

**Two colleges did not award credit because students did not complete the college's review process.** For one student, the college (UCCS) told us it did not award any credit for the student's military experience because the student did not complete the college's JST review process. This student's JST included 52 ACE-recommended credits. Per the college's military transcript evaluation process, students should submit their JST to the UCCS Admissions office, but the student also must initiate the evaluation process with the UCCS Veteran and Military Affairs office since the Registrar's Office does not have the ability to interpret JSTs. The student did not work with the Veteran and Military Affairs office to complete their JST review process – and possibly did not know this was a requirement. UCCS reported to us that starting in the Fall 2025 term, it removed the requirement for students to initiate the evaluation process. For another student at CU Denver, the student only submitted their JST and did not submit the accompanying Military Experience Form, which is required by the college to award the applicable 9 credits for having completed basic training and achieved an E4 rank while in the military. At the six other colleges included in our review of military students, staff will evaluate the JST upon its receipt and do not need students to submit a specific form. The Department told us that neither the Department nor the Commission generally have the authority to dictate institutional operating procedures.

**None of the 25 students who submitted a JST were eligible for any GT Pathways credit as outlined in the military PLA tables posted on the Department's website.** We reviewed each of the students' JSTs to see if the course and occupations appeared on the respective colleges' military PLA tables posted on the Department's website. None of the 25 students' 106 credit-bearing military experiences were listed on these military PLA tables, which indicates that the military PLA tables may not be effective in helping award GT Pathways credits to students with military experience. When creating the military PLA tables in late 2018, the Department told us it was aware that military occupations and courses were likely not going to crosswalk into many GT Pathways courses. In our review, we found that colleges often maintain and refer to their own databases that crosswalk military experience in order to award students credit for military experiences, rather than relying on the college's PLA table posted on the Department's website. Five colleges from our review (all but Colorado Mesa University, CU Boulder, and CU Denver) confirmed that they have built their own military PLA course equivalency databases, which are independent from the military PLA tables on the Department's website, to keep track of what courses they have previously evaluated to more easily evaluate future JSTs. The Department acknowledged that it may be helpful

for the Commission to update its policies to better reflect how students are awarded credit based on colleges' own military PLA evaluation methods.

**Five colleges incorrectly flagged in SURDS that a total of 12 students had military experience.** Of these 12 students, 5 were flagged by the colleges as active U.S. military service members, 1 was flagged as a reserve U.S. military service member, and 6 were flagged as honorably discharged veterans. The colleges (Colorado Mesa University, CSU, CU Boulder, UCCS, and CU Denver) informed us of these data entry errors after we selected the students as part of our review and the colleges were responding to our requests for information about the students. When we asked colleges how they collect information on students' military experience and enter the data into SURDS, they stated that either students' fill out admission forms where they self select if they have military experience – and then college staff enter the information into SURDS – or college staff identify and enter into SURDS students' military experience when student's seek federal financial aid for military service members.

## Why did these problems occur?

The Commission has not set policies for colleges on consistent methods of awarding credit for college-level learning acquired while in the military. When we shared the results of our analysis with the Department, its response largely was that colleges have discretion to set their own policies and award credits for military experience in their own way. However, with nearly half of the students in our selection not submitting—and potentially not knowing they need to submit—their military transcripts, and with the inconsistency and possible inequities of students receiving credits for their military experience across colleges, we determined that additional guidance, direction, or best practices could benefit both the colleges and Colorado's active duty, reserve, and veteran students.

In our review, the Commission's policies on awarding college credit for military experience are limited to two requirements specific to awarding GT Pathways credits. However, we have identified that the Commission could provide additional guidance on common areas of inconsistency that led to students not receiving credit for their college-level learning acquired while in the military. Commission policy could specify:

- **What documents, other than JSTs that list ACE recommendations, colleges can or should use to award credit for college-level learning acquired in the military.** For example, the Air Force documents college-level learning acquired while in the Air Force on CCAF transcripts, instead of on JSTs. In addition, two colleges used military students' DD214s – which include information about a veteran's dates of service, highest rank, foreign and sea service – to award credits. The Commission could address the extent that colleges can or should assess CCAF transcripts and DD214s when awarding students credits for college-level learning acquired in the military, which could create a consistent process across colleges for military students to more easily navigate transferring and receiving credits at Colorado public colleges. In addition, the Commission may consider working with the General Assembly to assess if statutory change is needed to clarify the extent to which colleges can award military students'

college credits based on military documents other than JSTs and then pursue any statutory changes deemed necessary.

- **How colleges should specify on students' transcripts exam credits and scores awarded based on students' JSTs or other military documents.** For the CU Denver student who lost GT Pathways credits for a CLEP exam listed on their JST when they transferred, we found that the student's originating college transcript listed the exam credit as the equivalent GT Pathways credit but did not specify that the credit came from a CLEP exam with a passing score on the student's JST. CU Denver was aware that the exam credit related to military experience and was guaranteed to transfer; however, it did not award the credit due to not having received the official CLEP exam score documentation from the student. In general, we noticed that college transcripts specify some of the credits awarded from students' JSTs, but not for exam scores listed on a JST. Instead, JST exam scores are often categorized under Prior Learning Assessment headers, which may include other exams taken by students before or after their completion of military service.

However, even if colleges indicate that exams originated from students' time in the military, we noticed that colleges do not list the students' score of the exam on the transcript. Without adding exam scores to students' transcripts, a receiving college will need to require students to submit the underlying documentation for each specific exam, which could lead to students losing credits if they do not submit—and potentially do not know they need to submit—official, underlying scores for each exam.

Additionally, the JST is an official academic document prepared by the U.S. Department of Defense, which could be considered a responsible third party. Requiring students to submit supporting documentation for exams taken and overseen by the U.S. Department of Defense can be seen as an extra administrative step and potential barrier for students to receive college credit. To help ensure students with military experience are successful in transferring credits from one college to another, the Commission could revise its policy to instruct or guide colleges on what information to document on students' transcripts in order for other Colorado public colleges to know what courses they are required to accept and to allow for colleges to accept exam scores provided by responsible third parties without requiring underlying documentation. The Department told us that “ideally, institutions would follow the same procedures for documentation required to award credit for prior learning” but that, “Statute and policy support institutional autonomy in setting operating procedures and awarding credit.”

- **How colleges should award credits for DLPT exams.** For the MSU Denver student who did not earn credits for two DLPT exams, the college told us a factor that led to the denial of credits was that the student earned a score of 2, which the college considered to be too low to accept. In our review, we noticed that Commission policy requires colleges to award students GT Pathways world language credit for DLPT tests listed on JSTs “for qualifying scores at ACE recommended cut scores.” However, ACE does not make recommendations on DLPT “cut” scores and therefore, Commission policy does not provide enough information or direction to colleges on awarding credits for DLPT exams. We could not determine what DLPT scores

typically are accepted by colleges for course credit, given that DLPT scores range from 0+ to 5. As an example on how DLPT scores are not easily translated into applicable course credits, a score of 1 is “elementary proficiency,” a score of 2 is “limited working proficiency,” and a score of 3 is “general professional proficiency.” The Commission could conduct analyses to determine and specify in policy what DLPT scores are eligible to earn either lower-division or upper-division course credits.

- **How and when colleges should request that students submit JSTs and other military documents.** In our review, we found that practices for prompting military students to submit their transcripts varied across the eight colleges. Of the six colleges where a total of 25 students did not submit military transcripts, one college (CU Boulder) reported that it does not prompt students to submit their military transcripts for evaluation. The other five colleges (CSU, UCCS, Aims Community College, CU Denver, and MSU Denver) reported that they prompt students to optionally submit their military transcripts for evaluation at one or more stages of the student’s enrollment (e.g., admissions, enrollment, student orientation, when students are referred to the college’s veteran services office). We found that these five colleges still had students who did not submit their transcripts to the college for evaluation. CSU reported to us that in 2023, they changed their process where staff now will order a student’s JST if the student indicates they have military experience and there is not already a JST in the student’s record. In contrast, at the two colleges where all selected students submitted their military transcripts for evaluation, one college (Pikes Peak State College) reported that it obtains a JST from the U.S. Department of Defense on behalf of the student, and the other college (Colorado Mesa University) reported that it requires the student to submit their JST to the college as part of applying for federal veteran education benefits. Also, for the three students who had exam scores listed on their JSTs and did not earn credit for their exams, the colleges told us they needed to see the underlying exam scores and could not simply use the information on the JSTs. It is unclear the extent that college staff informed the students that additional documentation was necessary to receive credits for their exams.

With the Commission’s oversight of prior learning policy and in consultation with its key stakeholder groups, the Department acknowledged that it could provide additional guidance and best practices to help colleges increase student submission rates of the JSTs, official exam scores, and other military documents in order to optimize students’ military experience. However, the Department told us that neither the Department nor the Commission have the authority to dictate operating procedures at the colleges. As part of this, the Commission could consider clarifying in its policy that colleges can – and possibly should – accept exam scores as they are listed by the U.S. Department of Defense on students’ JSTs to minimize the risk of students losing credits for their exams.

- **What types of policies college governing boards must adopt to be compliant with state statute.** House Bill 17-1004 required “each governing board” of a Colorado public college to adopt, make public, and implement policies related to awarding military credit, including providing “specific guidance” to military students “in selecting a program of study and in optimizing” their military experience “to accelerate the student’s path to degree or certificate

completion” [Section 23-5-145(2), C.R.S.]. The legislation also required the Department to submit a report to the General Assembly in 2018 “regarding the adoption and implementation of the institutions’ policies adopted pursuant to this section.” The Department completed a report in 2018 that listed information on each Colorado public college’s policies, which included course catalogs, websites, and resources that were not formal governing board policies. In our review, we found that only three of eight colleges have policies adopted by the colleges’ governing boards while the other five colleges have other documents, such as campus-specific policies, course catalogs, or policies and procedures adopted by college presidents or other college leadership. We found that colleges that had governing board policies were more likely to receive students’ JSTs and to award more credit for students’ military experience when compared to colleges without governing board policies. The Department told us that while the five colleges that lacked policies on awarding military credit approved by their governing board did not “adhere firmly to the letter of statute,” the Department considers the other resources these colleges have related to awarding credit for military experience as meeting statutory intent. The Commission could clarify in its policies what types of policies colleges need to have in place to be compliant with Section 25-5-145(2), C.R.S., and then work with the Department to confirm the extent that colleges have these policies in place, which could include the Department submitting analysis or a report on colleges policy implementation to the Commission.

**The Commission’s policy on how colleges should award GT Pathways credit for students’ military experience appears to be outdated.** Since the Department posted the military PLA tables in 2018, the ACE Military guide has added more than 2,000 new credit recommendations for college-level learning in the military. These updates to the ACE Military guide, along with our results showing that none of the 25 selected students’ 106 credit-bearing military experiences were listed on these military PLA tables, indicates that the Commission’s policy directing colleges to use these 2018 tables may be out of date. The Commission should determine if its policy should continue to direct colleges to use the military PLA tables posted on the Department’s website to award students with military experience GT Pathways credits. If the Commission determines to keep its policy as written, it should work with the Department and colleges to update the military PLA tables posted on the Department’s website to reflect new ACE-recommended courses and establish a process to update the tables periodically to ensure they remain relevant to students. If the Commission determines that its policy should not continue to direct colleges to use the military PLA tables posted to the Department’s website to award GT Pathways credit, it should revise policy to better reflect how students are awarded college credit, either GT Pathways credits or for other types of standardized credit for common military experiences, based on colleges’ own prior learning assessment evaluation methods.

**The Department has not provided recent training or best practices to colleges on entering data into SURDS on students’ military experience.** The SURDS data field capturing students’ military information has been collected since at least 2013 and a description of how to enter student’s military information is posted on the Department’s website in its SURDS data dictionary. However, the Department has not provided recent trainings or best practices that cover how to ensure the accuracy of entering data into this field. Given that a majority of the colleges from our

review (five of eight colleges) incorrectly flagged students as having military experience, which impacted nearly 20 percent of the students in our selection (12 of 65 students), colleges could benefit from updated training or best practices from the Department on how to both enter, and ensure the accuracy of, data on students' military experience in SURDS.

## **Why do these problems matter?**

The problems we identified in our audit work create a missed opportunity for students to optimize their military experience to decrease both the time and cost to degree completion. When students do not submit their military transcripts for evaluation—and when colleges do not award all the credit the student is eligible for—students with military experience may miss out on the opportunity to optimize their military experience in working toward their degree. By colleges not evaluating military experience or not awarding credits as appropriate, this can lead to prolonging military students' time to degree completion, thus, prolonging the time it takes to when they can apply their skills to the workforce and increasing the costs of earning a college degree, whether paid with the student's own funds or GI bill benefits, or other financial aid once their GI bill benefits expire, which is at 36 months or 3 years for most military students. According to Department data, on average, students take 4.5 years to earn a 4-year bachelor's degree, which could result in a 1.5-year funding gap and increased financial barriers for military and veteran students.

For 1 year at a 4-year college in the 2021-2022 Academic Year, a student would pay an annual cost of attendance of \$27,730. This cost of attendance includes an average of \$10,900 in tuition and fees; \$11,500 in independent living expenses; \$1,460 on books and supplies; and \$3,870 (on the low end) on other expenses related to transportation, furnishings, laundry and entertainment. In addition, an extra year of college can delay students' entry into the workforce and cause a loss of \$45,000 in foregone annual wages, based on Department estimates of average first-year wages for bachelor's degree earners. Assuming that students are not working while enrolled in college, the combined cost of an additional year's worth of college costs and lost potential earnings was \$72,730 in the 2021-2022 Academic Year.

In 2017, the General Assembly stated its commitment to ensuring an easier pathway to career and financial success for students with military experience seeking college degrees, and the Department and Commission have shared with us their interest in improving the outcomes of military students in this area. If the Department and Commission decide to take steps to help ensure students with military experience receive appropriate college credit for college-level learning acquired while in the military, it will be important for colleges to enter reliable data in SURDS in order to identify military and veteran students enrolled in Colorado public colleges.

## Recommendation 5

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The Colorado Commission on Higher Education should ensure students are receiving appropriate credit at Colorado public colleges for their college-level learning acquired while in the military by:

- A. Revising policy to establish expectations for colleges to provide consistent methods of evaluating and awarding college credit for military experience. This guidance should include the extent to which colleges can rely on documentation other than Joint Services Transcripts (JSTs) and American Council on Education (ACE) recommendations to award credit for college-level learning, such as DD214 forms and Community College of the Air Force transcripts, and guidance on any other discrepancies the Commission may observe across colleges policies.
- B. Assessing whether statutory change is needed to clarify the extent to which colleges can award military students' college credits based on military documents other than JSTs and pursue any statutory changes deemed necessary.
- C. Revising policy to address how colleges should signify on students' transcripts that students earned credit for exams listed on JSTs and to provide guidance to colleges on how to ensure they accept Guaranteed Transfer (GT) Pathways credit for military experience in transfer, as required by statute.
- D. Determining whether colleges can or should accept college credit awarded for College-Level Examination Program (CLEP) and DANTES (Defense Activity for Non-Traditional Education Support) Subject Standardized Tests (DSST) exams completed while in the military in transfer that is evaluated and/or awarded by responsible third parties without requiring that students submit underlying documentation, and revising policies as appropriate. As part of this, the Commission should consider revising policy to define which entities are considered to be responsible third parties, such as other Colorado public colleges, the American Council on Education (ACE), and the U.S. Department of Defense.
- E. Revising policy to provide clear guidance to colleges on the Defense Language Proficiency Test (DLPT) scores that qualify students to be awarded GT Pathways world language credit.
- F. Revising policy to guide colleges on exercising consistent methods on how and when to reach out to students with military experience or otherwise help ensure the students know that they can submit JSTs and other military documents to help them earn college credit, and to provide assistance to the students in obtaining these military documents.
- G. Revising policy to clarify what types of policies colleges need to have in place to be compliant with Section 23-5-145(2), C.R.S., which requires college governing boards to adopt policies related to awarding credit for military experience, and then working with the Department to confirm the extent that colleges have these policies in place.
- H. Determining whether it should work with the colleges to update the 2018 military prior learning assessment (PLA) tables posted on the Department of Higher Education's website and establish

a process to periodically update the tables going forward. If the Commission determines not to work with colleges to update the 2018 military PLA tables, the Commission should revise policy to replace the direction to colleges to use the military PLA tables posted on the Department of Higher Education's website with direction that better reflects how students are awarded credit based on colleges' own prior learning assessment evaluation methods.

## Response

### Colorado Commission on Higher Education

#### A. Agree

Implementation Date: October 2026

The Commission agrees with this recommendation and will update Commission policy Section I, Part X on Credit for Prior Learning to provide clearer direction on awarding credit for military education and training. This work builds on the foundation of HB17-1004 College Credit for Military Education and Training, which charged the state institutions of higher education to develop a policy for awarding college-level credit for learning acquired in the military, which was folded into statewide transfer policy. During that time, the Commission partnered with the General Education Council with resources from the American Council on Education to review Joint Services Transcript (JST) military courses and occupations to approve a list of course equivalencies. To ensure consistency and fairness across institutions, the Commission will leverage the Transfer Subcommittee in consultation with the Academic, General Education, Admissions, and Registrar Councils to recommend updates to policy to ensure recognition of the variety and scope of learning documented through official military transcripts (e.g., JST, Community College of the Air Force (CCAF) Transcript), and other military records and certificates (e.g., DD Form 214 Certificate of Release or Discharge from Active Duty, DD Form 295 Application for the Evaluation of Learning Experiences, certificates of completion for specialized training, and other MOS/Rating/AFSC documentation of occupational specialty and duty). These recommendations will first be presented to the Commission's Transfer Subcommittee as part of broader efforts to strengthen the statewide transfer system. Any proposed policy changes will require approval by the Student Success and Workforce Alignment Committee before moving forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

#### B. Agree

Implementation Date: October 2026

The Commission agrees with the recommendation and requests that the Department first analyze the availability and content of current institutional policies regarding the awarding or waiving of college credit based on military documentation, similar to the review conducted under HB17-1004. The Department will submit this analysis to the Commission prior to formal policy discussions to ensure the Commission has a clear understanding of current institutional practices. The Transfer Subcommittee and the Student Success and Workforce Alignment

Standing Committee will determine whether statutory change is needed to clarify the extent to which colleges can award or waive credits based upon military documents other than a Joint Services Transcript. Should changes be deemed necessary, the Commission will work with the Department, its relevant councils, and other stakeholders to pursue appropriate statutory revisions. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

C. Agree

Implementation Date: October 2026

The Commission agrees with this recommendation and will update relevant Commission policy focused on GT Pathways and prior learning assessment. This will require consultation with multiple advisory groups, including the General Education, Academic, Admissions, and Registrar Councils to develop proposed policy modifications. Additionally, institutions may require technical guidance regarding transcript notations through collaboration with the Registrars Council. These recommendations for policy updates and technical guidance will first be presented to the Commission's Transfer Subcommittee as part of broader efforts to strengthen the statewide transfer system. Any proposed policy changes will require approval by the Student Success and Workforce Alignment Committee before moving forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

D. Agree

Implementation Date: October 2026

The Commission agrees with this recommendation and will update relevant Commission Policy, with a specific focus on evaluating Section I, Part X, 3.03 on institutions' ability to require original documentation for awarding credit for prior learning and Section I, Part L on Statewide Transfer Articulation Agreements. To inform this work, Department staff will research current institutional documentation requirements for transfer admission and college credit articulation, including the different forms and sources of documentation, and consider circumstances where submission requirements may be waived. The Department will also work with institutional representatives to define quality and consistent metrics for recognizing responsible third parties to allow for waiving requirements for submission of original documentation. This process will involve consultation with multiple advisory groups, including the General Education, Academic, Admissions, and Registrar Councils to develop proposed policy modifications. These recommendations will first be presented to the Commission's Transfer Subcommittee as part of broader efforts to strengthen the statewide transfer system. Any proposed policy changes will require approval by the Student Success and Workforce Alignment Committee before moving forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

E. Agree

Implementation Date: October 2026

The Commission agrees with this recommendation and will update relevant Commission policy to clarify the expected course equivalencies relevant to the DLPT scores and levels. Department staff will coordinate the proposed policy changes with the GE Council with specific consultation of American Council on Education's Credit Recommendations Guide before presenting to the Transfer Subcommittee as part of broader efforts to strengthen the statewide transfer system. Any proposed policy changes will require approval by the Student Success and Workforce Alignment Committee before moving forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

F. Agree

Implementation Date: October 2026

The Commission agrees with this recommendation and will update relevant Commission Policy with a specific focus on evaluating Section I, Part X on Prior Learning Assessment, including possible modification to General Provision 3.03 which permits receiving institutions to require students to resubmit test scores or other original documentation if they transfer. Additionally, Commission policy Section I, Part L (on Statewide Transfer Articulation Agreements) may be revised to facilitate more seamless transfer between Colorado institutions. To inform this work, Department staff will research current institutional practices for requiring and promoting submission of transfer transcripts, JSTs and other military documents. The Department will consult with multiple advisory groups, including the General Education, Academic, Admissions, and Registrar Councils to develop proposed policy modifications to incorporate specific requirements or other recommended guidance. These recommendations will first be presented to the Commission's Transfer Subcommittee as part of broader efforts to strengthen the statewide transfer system. Any proposed policy changes will require approval by the Student Success and Workforce Alignment Committee before moving forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

G. Agree

Implementation Date: October 2026

The Commission agrees with the recommendation and requests that the Department first analyze the availability and content of current institutional policies regarding the awarding or waiving of college credit based on military documentation, similar to the review conducted under HB17-1004. The Department will submit this analysis to the Commission prior to formal policy discussions to ensure the Commission has a clear understanding of current institutional practices. The Department will support institutions and the Commission in reviewing and developing any institutional policies needed to ensure alignment with CRS 23-5-145(2), Commission policy, and institutions' policies. As necessary, the Department will consult with

multiple advisory groups, including the General Education, Academic, Admissions, and Registrar Councils to develop proposed policy modifications. These recommendations will first be presented to the Commission's Transfer Subcommittee as part of broader efforts to strengthen the statewide transfer system. Any proposed policy changes will require approval by the Student Success and Workforce Alignment Committee before moving forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

#### H. Agree

Implementation Date: October 2026

The Commission agrees with this recommendation and will collaborate with institutions to bring the military PLA tables current from the 2018 original creation. The Department will also establish a process to ensure these tables are periodically updated on an ongoing basis, so they remain relevant and accurate in recognizing military learning and experience for academic credit. This work builds on the foundation of HB17-1004 College Credit for Military Education and Training, which charged the state institutions of higher education to develop a policy for awarding college-level credit for learning acquired in the military, which was folded into statewide transfer policy. At that time, the Commission partnered with the General Education Council and the American Council on Education to review Joint Service Transcript military courses and occupations and to approve a list of course equivalencies. The Commission reaffirms its commitment to this exchange to ensure that Colorado's military-affiliated students receive consistent and equitable recognition of their prior learning across the state. As necessary, the Department will consult with multiple advisory groups, including the General Education, Academic, Admissions, and Registrar Councils to develop proposed policy modifications. These recommendations will first be presented to the Commission's Transfer Subcommittee as part of broader efforts to strengthen the statewide transfer system. Any proposed policy changes will require approval by the Student Success and Workforce Alignment Committee before moving forward to the full Commission for consideration. Work on this recommendation will begin within 60 days of the October 20, 2025, legislative audit hearing.

## Recommendation 6

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The Department of Higher Education (Department) should ensure students are receiving appropriate Guaranteed Transfer (GT) Pathways credit at Colorado public colleges for their college-level learning acquired while in the military. This should include reviewing the problems the audit identified where students may not have been awarded appropriate GT Pathways credit for college-level learning acquired while in the military and, as appropriate and pursuant to Section 23-1-108.5(8), C.R.S., which gives the Department exclusive authority to resolve GT Pathways transfer disputes, the Department should work with the students' colleges to ensure the students receive appropriate GT Pathways credits.

## Response

Department of Higher Education

Agree

Implementation Date: January 2026

The Department agrees with this recommendation and will follow up with the students' colleges where the three student issues were identified to both ensure they receive proper credits earned while in the military as directed by policy and that the Commission policy on transfer credit works as designed and students receive course credits for their military work as appropriate.

## Recommendation 7

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The Department of Higher Education should help ensure that colleges are accurately entering data into the Student Unit Record Data System (SURDS) that indicate students' military experience by providing guidance and training to colleges on how to accurately enter information on students' military experience into SURDS.

## Response

Department of Higher Education

Agree

Implementation Date: October 2026

The Department agrees with this recommendation and will work with institutional data and registrar staff to develop clear guidance on how military experience should be captured in SURDS. The Department will provide training and technical assistance to help ensure institutional practices are consistent, accurate, and aligned with statewide reporting requirements.





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