**Topic: Recommended Approval of Blanket Waiver of GT Pathways Curriculum Requirements for the Bachelor of Applied Sciences Degree Programs at Community Colleges and Baccalaureate-Degree Granting Institutions**

**Prepared by: Brad Griffith, Senior Director of Academic Pathways and Innovation and Christina Carrillo, Academic Policy Officer and Advocate**

1. **Summary**

This consent item recommends approval of a blanket waiver of GT Pathways curriculum requirements for the Bachelor of Applied Science (BAS) degree programs that are developed at all Colorado community colleges and baccalaureate-degree granting institutions. This blanket waiver recognizes that BAS degrees are applied completion pathways built on Associate of Applied Science (AAS) degree programs designed for working professionals, allowing programs to align with workforce needs while still ensuring the statutory core course competencies in reading, critical thinking, written communication, mathematics, and technology are achieved.

1. **Background**

Institutions of higher education (IHEs) are required by CCHE Policy I, Part L (Statewide Transfer and GT Pathways) to seek a waiver from GT Pathways curriculum requirements when their baccalaureate degree programs do not meet the full curriculum requirements. Commission approval is required for such a waiver per §23-1-125(3), Colorado Revised Statutes (C.R.S.), which states “in creating and adopting the [core curriculum] guidelines, the department and the commission, in collaboration with the public institutions of higher education, may make

allowances for baccalaureate programs that have additional degree requirements recognized by the commission.” Additionally, per CCHE Policy I, Part V (Creation, Modification, or Discontinuance of Academic and Vocational Programs at Public Institutions of Higher Education), Section 4.02.03 states, "if the Department determines that the [academic program] proposal is not consistent with…GT Pathways requirements (if applicable), it will so inform the governing board. The Department shall take credit cap and GT Pathways (where applicable) waiver requests to the Commission for action”.

At its May 2019 meeting, the Commission approved revisions to CCHE Policy I, Part L (Statewide Transfer and GT Pathways), which codified a process for institutions seeking a GT Pathways waiver for an individual degree program and criteria for the Commission to use in determining whether to grant a full/blanket waiver, a modified/limited waiver, or no waiver. The process includes six questions that an institution must address to aid Department staff in making a recommendation to the Commission for action:

1. Why it is important that a [GT] Pathways waiver be granted for this program (address the nature of the degree relative to the profession, if applicable, including work pathways for students entering the program)?
2. Which specific components of the [GT] Pathways curriculum are requested to be waived or modified?
3. How will the institution ensure that the program includes a “core of courses” that provide a general education through which “students demonstrate competency in reading, critical thinking, written communications, mathematics, and technology”, as articulated in Colorado Revised Statutes 23-1-125(3)? How will the general education provided respond to the 10 competencies of the [GT] Pathways curriculum?
4. What additional degree requirements, such as those associated with accreditation and licensure, make it impossible to include the full [GT] Pathways in the program curriculum?
5. How will the absence of a [GT] Pathways waiver potentially harm students (if, for example, it extends the time to degree beyond four years, or results in certain critical courses being left out of a program)?
6. How will the institution ensure that the [GT] Pathways waiver will not create barriers to student transfer?

Since being codified into policy, the Department has received and reviewed at least five modified/limited waiver requests for BAS programs from different IHEs, which the Commission ultimately granted. The Department followed this process for the current waiver request, as well as a simultaneous waiver request for a BAS Technical Education degree program for Red Rocks Community College, including discussion with the General Education (GE) Council at its August 2025 meeting.

As BAS offerings expand to meet workforce demand, the GE Council agreed with the identified need for a streamlined, flexible approach as presented by representatives from the Colorado Community College System. The proposal for a blanket waiver would replace the Council and Department’s processing of serial, program-by-program requests.

1. **Staff Analysis**

The Guaranteed Transfer (GT) Pathways curriculum was created by statute in 2001 and is defined in §23-1-108.5(2)(e) as “a group of general education courses or lower-division courses…that every student enrolled…at the institution must successfully complete…”. The main principles of this “core course concept” are that 1) the curriculum should be designed to ensure that students demonstrate certain competencies; 2) it shall consist of at least thirty-one credits; and 3) it shall apply to all public institutions of higher education in Colorado. The original intent of GT Pathways was to ease transfer between institutions and preserve credit for courses taken to the extent feasible.

Statutory language implies that every degree program should contain the GT Pathways curriculum. It was recognized by the Department early on that the GT Pathways curriculum “mapped” best to the general education core of degrees in the liberal arts and sciences and that it could be difficult to apply the curriculum to certain degrees with very different general education cores and additional accreditation requirements – such as nursing and engineering – as well as to applied degrees such as the BAS, which are more career and technically oriented and designed to focus on professional preparation for a specific vocation.

The general education courses in BAS programs are usually contextualized within the career. For this reason, the courses in the degrees may not always be part of GT Pathways, even though they are designed to address similar outcomes. As a result, many (but not all) BAS degrees previously approved by the Commission have also received waivers allowing the sponsoring institution to create an academic program that does not include the full GT Pathways curriculum. While the general education cores of these degrees do not contain the GT Pathways curriculum, they nonetheless are aligned with the statutory requirement that they be “…designed to ensure that students demonstrate competency in reading, critical thinking, written communication, mathematics, and technology” [§23-1-108.5(2)(c)].

In the intervening years since the GT Pathways curriculum requirements waiver was codified into policy, the Commission no longer has program approval over BAS degree programs.

In consultation with the GE Council, Department staff have identified multiple areas of **supporting rationale for granting the blanket waiver**:

* **BAS degree programs have a distinct mission** to serve career-focused learners and are built on AAS pathways which are co-designed with industry.
* **Credit capacity is necessary** for the technical depth and nature of coursework included in BAS degrees, which could be undermined by requiring the full 31 credit hours of GT Pathways courses.
* **BAS degrees target career advancement** instead of traditional transfer, but students in these programs can still be supported and protected through statewide transfer policies and structures, including modifications to Commission policy to account for applied science degrees.
* **Existing waivers demonstrate multiple models** for integrating core course competencies within technical coursework while showing institutions still include the most relevant GT Pathways selections.
* **BAS degree programs remain subject to HLC requirements** for breadth, intellectual skills, and outcomes assessment. Additionally, professional and licensure expectations (e.g. Teacher Education) further structure program content.

**Student Communication and Transparency**

To ensure clarity for prospective and current students, institutions offering BAS degrees should clearly distinguish BAS pathways from BA/BS programs, especially when parallel offerings exist (e.g. Business). This includes:

* Publishing program descriptions that emphasize the applied, workforce focus of BAS degrees;
* Making it explicit that BAS degrees are not designed as transfer pathways into traditional liberal arts or graduate programs; and
* Highlighting advantages for students with AAS backgrounds in seeking BAS degrees for career advancement.

Clear communication will help students make an informed decision and to avoid earning a degree which might not be the best fit for their desired path.

See **Attachment A**: Blanket Waiver Request for Bachelor of Applied Sciences Degrees Proposal

**Attachment B**: BAS Waiver Questions for responses to the six waiver questions for program-level assurance models and rationale.

1. **Staff Recommendations**

**Staff recommend that the Commission:**

* **Approve the blanket waiver of GT Pathways curriculum requirements for all Bachelor of Applied Science degree programs at all Colorado community colleges and public baccalaureate-degree granting institutions;**
* **Direct Department staff to revise CCHE Policy I, Part L (Statewide Transfer and GT Pathways), as necessary, to (a) reflect that BAS degree programs no longer require GT Pathways waivers and (b) offer guidance for acceptable competency assurance models.**
1. **Statutory Authority**

**C.R.S. § 23-1-125**

**Commission directive - student bill of rights - degree requirements - implementation of core courses - competency test - prior learning - prior work-related experience - policies - definitions - repeal.**

…

**(3) Core courses.** The department, in consultation with each Colorado public institution of higher education, is directed to outline a plan to implement a core course concept that defines the general education course guidelines for all public institutions of higher education. The core of courses shall be designed to ensure that students demonstrate competency in reading, critical thinking, written communication, mathematics, and technology. The core of courses shall consist of at least thirty credit hours but shall not exceed forty credit hours. Individual institutions of higher education shall conform their own core course requirements with the guidelines developed by the department and shall identify the specific courses that meet the general education course guidelines. Any such guidelines developed by the department shall be submitted to the commission for its approval. In creating and adopting the guidelines, the department and the commission, in collaboration with the public institutions of higher education, may make allowances for baccalaureate programs that have additional degree requirements recognized by the commission. If a statewide matrix of core courses is adopted by the commission, the courses identified by the individual institutions as meeting the general education course guidelines shall be included in the matrix. The commission shall adopt such policies to ensure that institutions develop the most effective way to implement the transferability of core course credits.

**Attachment(s):**

Attachment A: Blanket Waiver Request for Bachelor of Applied Sciences Degrees Proposal

Attachment B: BAS Waiver Questions