



Hospital Reporting Requirements

Senate Bill (SB) 26-138;
House Bill (HB) 26-1207

Background:

The legislature passed several bills during the 2026 session that modify hospital reporting requirements and related administrative processes. To assist hospitals in preparing for implementation and maintaining compliance with evolving state requirements, this issue brief highlights key statutory changes affecting hospital reporting obligations, timelines, and data submission requirements.

SB 26-138: Hospital Financial Transparency Reporting (Regulatory Relief)

The bill modifies certain hospital reporting requirements administered by the Colorado Department of Health Care Policy and Financing (HCPF). The law requires HCPF to establish the content and format of hospital transparency reports through the formal rulemaking process, limiting the department's ability to make reporting changes outside of rulemaking. The bill also requires HCPF to provide hospitals and CHA with a draft transparency report by Dec. 1 each year for review prior to publication. Additionally, the bill extends the deadline for hospitals to submit audited financial statements from 120 days to 150 days following the end of the hospital's fiscal year.

What you need to know:

Hospitals should monitor upcoming HCPF rulemaking related to hospital transparency reporting requirements and participate in stakeholder engagement opportunities regarding report content, formatting, and submission expectations. Hospitals should also review internal workflows and timelines for reviewing draft transparency reports released by HCPF prior to publication.

Additionally, hospitals may wish to reassess financial reporting timelines and coordination processes with finance teams and external auditors in light of the extended deadline for submitting audited financial statements.

Effective date:

- Aug. 12, 2026

Additional Resources:

- [SB 26-138 Rerevised Bill Text](#)
- [SB 26-138 Fiscal Note](#)

HB 26-1207: Disclosure of Demographic Workforce Data

The bill requires certain employers that file periodic reports with the Colorado Secretary of State to also submit demographic workforce data collected through the federal Equal Employment Opportunity Commission's EEO-1 form. The requirement applies to private sector employers with 100 or more employees and continues even if the federal government repeals or discontinues EEO-1 reporting requirements. Employers must use the EEO-1 form as it existed on March 1, 2026.

What you need to know:

Hospitals and health systems meeting the definition of an employer under the law should review workforce demographic data collection, reporting, and record retention practices to ensure continued compliance with state reporting requirements. Because the state requirement remains in place regardless of future federal action, hospitals should prepare to maintain EEO-1 data collection and reporting capabilities even if federal reporting obligations change.

Hospitals should also review coordination processes between human resources, legal, compliance, and information technology teams to ensure demographic workforce data is collected, maintained, and submitted in accordance with applicable state requirements and reporting timelines.

Effective date:

- July 1, 2027

Additional Resources:

- [HB 26-1207 Final Bill](#)
- [HB 26-1207 Fiscal Note](#)