



Consultation on fees

May 2025



### A simpler, fairer fee system

Over time our fee regime has become complex for Tertiary Education Organisations (TEOs) to keep track of and complex for NZQA to administer. It has also become inequitable with TEOs using standards paying a greater share of NZQA's total fee revenue.

This consultation is about moving to a simpler, fairer fee system.

Our suggested fee approach is to have:

- a credit reporting fee that extends to all qualifications, micro-credentials, and standards, and:
- a professional services fee as either
  - o an hourly rate; or
  - set fees for each approval and accreditation service<sup>1</sup>.

We would welcome any feedback you have on these proposals. An explanation of the fees and information on how to provide feedback is set out at the end of this document.

We expect that any change in the credit reporting fee (structure and amount) would be implemented from 1 January 2026. We propose that the professional services fee be increased from 1 January 2026.

<sup>&</sup>lt;sup>1</sup> Note that an hourly rate fee would not disappear entirely as it would still apply to some matters such as additional moderation required because of non-compliance.

## Background

## NZQA is expected to be partially self-funding through charging fees

Since its establishment in 1990, NZQA's financial model has been built on a combination of cost recovery and Crown funding for its quality assurance functions. NZQA's fee revenue allows us to:

- approve, and in some situations develop qualifications, micro-credentials and skill standards to support New Zealand's secondary and tertiary education, including work-based training;
- quality assure TEOs that deliver and assess those qualifications and credentials so that learners, employers and the community can be confident that the education they are purchasing will be of value;
- provide the New Zealand Record of Achievement to maintain a life-long record of the
  qualifications, micro-credentials and skill standards each person gains as they move from
  school into tertiary education and then throughout their working life; and
- to do all those other things that underpin a central government agency such as providing guidance, managing data and information technology systems, answering information requests, ensuring our qualifications are recognised overseas and many more activities.

NZQA receives some Crown funding for functions which protect the government's investment in education and training, such as the pastoral care of learners and investigating non-compliance with legislation and rules.

Some of our counterparts are entirely self-funded through fees, for example the Australian Skills Quality Authority.

#### Fees have not increased for some time

The credit reporting fee of \$1.37 (GST exclusive) per credit was last increased in 2008.

The professional services fee of \$190 per hour (GST exclusive) was last increased in 2018.

The assuring consistency fee, which varies across qualification level and inclusion of assessment standards, was set in **2015**.

The annual fee, applicable to wananga and private training establishments (PTEs), was set in **2002** and varies according to the Equivalent Full Time Students (EFTS) enrolled by each organisation and is determined as follows:

- a. a base fee of \$775 (GST exclusive), plus
- b. \$10 multiplied by the number of EFTS (GST exclusive).

Government Training Establishments are charged a standard annual fee of \$1600 (GST excl).

Te Pūkenga pay an agreed annual infrastructure fee of \$910,000 (GST exclusive) that is only for professional services provided to the former ITP business divisions.

#### Our current fee levels are not sustainable ...

NZQA's fees have not changed for a considerable period, despite cost increases and inflation. Instead NZQA has put in place cost reduction initiatives to mitigate ongoing cost pressures, for example by minimising travel.

#### ... nor are they equitable

Approximately two thirds of our fee revenue is contributed by TEOs who pay the credit reporting fee. Much of the revenue currently comes from the Work-based Learning business divisions of Te Pūkenga and from PTEs that provide standards-based vocational education and training.

The credit reporting fee was introduced in 1993 to fund the National Qualifications Framework (NQF). At that time all NQF qualifications were made up of unit standards and the completion of any unit standard generated revenue for NZQA via the credit reporting fee. This meant that TEOs paid a fee that reflected student completion of unit standards as they built towards the completion of a qualification.

In 2010, the New Zealand Qualifications Framework and new qualification types (New Zealand Certificates and Diplomas) were introduced. TEOs were able to opt out of using standards leading to New Zealand Certificates and Diplomas. Since then, the overall decline in the use of standards has been mirrored by a decline in credit reporting fee revenue. The result is that TEOs using standards are paying more and this provides an incentive to move away from standards, undermining the policy intent that TEOs will use standards to support consistent graduate outcomes and portability of learning.

#### What this inequity looks like in practice

Consider two TEOs, both with 100 EFTS, both have an external evaluation and review (EER) every 4 years:

**TEO 1:** learners complete 100 level 2 qualifications of 120 credits with standards

**TEO 2**: learners complete 100 level 2 qualifications of 120 credits without standards.

	TEO 1	TEO 2
Annual fee: base fee of \$775 + \$10/EFTS	\$1775	\$1775
Consistency fee: \$10.44 or \$12.17 per graduate	\$1044	\$1217
Credit reporting fee: \$1.37 per credit	\$16,440	\$0

EER charge of \$12,000 every 4 years (\$3000 per year)	\$3000	\$3000
Total fees paid annually (GST exclusive)	\$22,259	\$5,992

#### A fairer fee system

Regardless of any other factor we must also address the inequity created by our reliance on the credit reporting fee for the bulk of our fee revenue. Redistributing the cost of the credit reporting fee across all TEOs and making some adjustment to reflect inflation and the cost of investing in upgraded IT infrastructure will mean an overall fee increase for many TEOs.

# Proposal One: To increase the professional services fee

We intend to retain the professional services fee to apply to approval costs sought by TEOs regardless of a decision to move to a simplified annual fee. This is because the fee applies to matters that are only of relevance to a particular TEO.

The professional services fee was last increased in July 2018, to \$190 per hour (excluding GST). Calculating the impact of inflation since then and factoring in forecast inflation suggests an increased fee of \$244.29. We propose setting the fee at \$240 (GST exclusive) for introduction from 1 January 2026.

A fee of \$240 per hour (GST exclusive) is comparable with hourly rates charged by government agencies with similar services to NZQA. Raising the fee to \$240 (GST exclusive) would have the following estimated impact on these examples of 'NZQA approvals' activities.

	Average staff time in hours (2023)	@ \$190	@ \$240 (increase of)
Programme Approval & Accreditation	9.47 hours	\$1,800	\$2,270 (+\$470)
Programme Change	7 hours	\$1,330	\$1,680 (+\$350)

#### Note that any:

- application for approval, accreditation, or consent received before 1 January 2026; and
- External Evaluation and Review scheduled in 2025

would be charged at the existing hourly rate of \$190 per hour (excluding GST).

# Proposal Two: To change the professional services fee to a set fee

An alternative approach used by other government agencies is to set a fee for each service provided rather than to use a professional services hourly rate.

This can be beneficial to both client and service provider. TEOs would benefit from certainty of costs prior to purchasing the service and NZQA would benefit from a reduction in administrative costs.

Under this option NZQA would publish a set fee for each activity. Whereas now we list activities and indicate that they would be charged out at \$190 per hour (GST exclusive).

We are seeking your feedback on whether you would prefer to move from an hourly rate to a set fee per activity.

If this proposal is supported, we will undertake a thorough assessment of costs to determine the dollar value of each of the fees.

Consultation on the dollar value for each fee would then be undertaken via a Rule setting process commencing later in 2025.

## Proposal Three: To extend the credit reporting fee

The credit reporting fee for standards was last increased in 2008 and is currently set at \$1.37 (GST exclusive) per credit.

Extending the credit reporting fee to all qualifications, micro-credentials and standards listed on the New Zealand Qualifications and Credentials Framework (NZQCF):

- provides an opportunity to simplify NZQA's fee structure by relying on this fee for most of our fee revenue;
- would allow NZQA to remove the annual fee and the consistency fee; and
- creates a more equitable fee distribution across TEOs.

## Adding micro-credentials to section 452(1)(s) of the Education and Training Act

In 2022, amendments to the Education and Training Act (the Act) included renaming the New Zealand Qualifications Framework (NZQF) to the NZQCF, which recognises the integral role of micro-credentials in the education and training landscape.

NZQA maintains a New Zealand Record of Achievement for all learners. Sections 452(1)(r) and (s) of the Act enable NZQA to create rules for the reporting of credits gained by learners that have completed study or training towards qualifications and standards.

To ensure the completeness of a learner's record of achievement, we propose 'micro-credentials' be added to section 452(1)(s) as follows:

(s) for the purposes of rules made under paragraph (r), specifying the qualifications, **micro-credentials** or standards for which institutions or workforce development councils are required to report the credits gained by students who are undertaking or who have undertaken study or training towards those qualifications, **micro-credentials** or standards.

We propose extending the credit reporting fee to learning that is not standards-based for introduction from 1 January 2026.

The timing of the introduction of reporting credits for micro-credentials to a learner's Record of Achievement, along with any associated credit reporting fee, is dependent on this amendment.

### Consultation questions

Proposal One: Increasing the professional services fee from \$190 per hour (GST exclusive) to \$240 per hour (GST exclusive) from 1 January 2026.

**Question 1.** What additional factors or considerations should we consider in determining the hourly rate?

## Proposal Two: Replacing the professional services fee with set fees for services from 1 January 2026.

This proposal is to move from the current practice of charging for each hour we work on an application to charging a set fee for each type of application. We would publish a table of fees and that is what you would be charged.

Please note we are consulting you only on the *concept* of moving away from an hourly rate to set fees for approval activities. If there is general support, we would undertake the detailed analysis that would enable us to bring a fully costed proposal to you, with the proposed fee for each service.

- **Question 2.** Do you support the concept of set fees for services? Please give the reason(s) for your preference.
- **Question 3.** What factors or considerations should we consider in determining set fees?

## Proposal Three: Extending the credit reporting fee to all qualifications, micro-credentials, and standards from 1 January 2026.

This proposal is to simplify the fee system and to address the current inequity by removing the assuring consistency and annual fees and extending the current credit reporting fee to all qualifications, micro-credentials, and standards.

- **Question 4.** Do you support the concept of extending the credit reporting fee to all qualifications and micro-credentials, as well as standards? Please give the reason(s) for your preference.
- Question 5. Do you support the inclusion of micro-credentials in section 452(1)(s) of the Education and Training Act? Please give the reason(s) for your preference.
- **Question 6.** What additional factors or considerations should we consider in extending the credit reporting fee to all qualifications, micro-credentials, and standards?

## How to have your say

Submissions can be made online at  $\underline{\text{https://www2.nzqa.govt.nz/about-us/consultations-and-reviews/simple-fee-system/}$  or by email to  $\underline{\text{QAFredesign@nzqa.govt.nz}}$  with "Fees consultation" in the subject.

You can answer the questions included in this document or provide any additional information or comments.

Submissions close at 11.59pm on 24 June 2025. Once submitted, your information will become a formal record for this programme of work. If you have any questions, need more information, or would like to provide your feedback in another form, please contact us at <a href="mailto:QAFredesign@nzqa.govt.nz">QAFredesign@nzqa.govt.nz</a>.