

24 June 2025

Consultation on the New Zealand Qualifications Authority's proposed fee increases

We are pleased to provide comment on NZQA's proposed fee increases.

About Te Rito Maioha Early Childhood New Zealand

Te Rito Maioha Early Childhood New Zealand (Te Rito Maioha) is an Incorporated Society of members committed to high quality early childhood education for every child. Established in 1963, we are an influential leader in shaping today's early childhood sector through advocacy, policy, tertiary education qualifications and professional development programmes.

We advocate for early childhood education services and the teachers | kaiako who provide education to thousands of infants, toddlers, and children | tamariki. Our members are drawn from a diverse range of community-based, privately-owned, kindergarten and homebased early childhood education services.

Te Rito Maioha is also a registered Private Training Establishment (PTE) with the highest Category One rating for a tertiary provider. We are accredited and approved by New Zealand Qualifications Authority (NZQA) to deliver a range of undergraduate, graduate, and postgraduate qualifications (levels 4-9), including specialist kaiako education, both nationally and internationally.

We are committed to achieving high-quality teaching and learning by:

- increasing kaiako knowledge of Te Tiriti o Waitangi and Aotearoa New Zealand's dual cultural heritage;
- providing access to online blended delivery of undergraduate, graduate, and postgraduate tertiary education programmes leading to recognised and approved qualifications;
- promoting quality teaching and leadership through ongoing professional learning and development programmes;
- providing a range of unique resources and services to our members.

NZQA's fee review seems timely

While fee increases are certainly not welcomed in an increasingly constrained financial environment, we understand the rationale, noting NZQA is partially cost recovery and has made efforts to avoid increases in recent years. Using this opportunity to simplify and improve transparency is sensible.

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

What additional factors or considerations should we consider in determining the hourly rate?

The increase seems reasonable. NZQA have provided a clear rationale for the new proposed hourly rate:

- the professional service hourly rate hasn't been reviewed or increased since 2018, and
- the proposed increase accounts for inflation increases and to align with comparable services from other government departments.



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

Do you support the concept of set fees for services? Please give the reason(s) for your preference.

A set professional services fees is transparent and will allow us to budget more accurately than we are currently able. While this is an advantage, without knowing what these proposed fees are it is difficult to comment or provide real feedback. We are cautiously supportive of the concept of a set fee.

What factors or considerations should we consider in determining set fees?

Transparency and fairness. The current approach of an hourly rate means tertiary education organisations (TEOs) pay actual costs for the work involved. TEOs are varied and we imagine the scope of work involved for NZQA is just as variable. A set fee must be affordable for any sized TEO.

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

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.

- As we don't deliver or report on standards, the credit reporting fee has not previously applied to us. The proposed fee, applied to all our credit reporting (over 1000 total EFTS), will mean a significant increase in our NZQA fees. Looking at two qualifications to unpack this unexpected cost for us:
 - If we had 50 students|taura enrolled full-time in our Graduate Diploma of Teaching (ECE), a 150-credit programme, that would equate to \$205.50 per taura, and a total of \$10,275 (GST exclusive).
 - Each year, we have an average of 470 taura (FTE) enrolled across all three years of our Bachelor of Teaching (ECE) programme. At 120 credits a year, that would equate to \$164.40 per taura, and a total of \$77,268 (GST exclusive).

These are only two of many qualifications we offer, and a small portion of all our enrolments in the above example but gives a sense of how significant this change will be for us.

- Given the unexpected and significant increases in fees, introducing the changes from 1 January 2026 is insufficient notice. We have not budgeted for such costs in the 2026 year.
- We appreciate the proposed changes will simplify the fee structure.
- If the proposed changes progress, we agree with removing the annual fee and the consistency fees.
- Are we correct in assuming the credit reporting fee remains unchanged at \$1.37 (GST exclusive) per credit?



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.

Yes, it makes sense for micro-credentials to be included in this section of the Act. Micro-credentials are a key – and growing - feature of the NZQCF and our sector, and the legislation should reflect and enable that.

Further comments

- Without knowing the set fees for NZQA's various activities, it is difficult to provide comment. As such, the proposed changes create some uncertainty. We hope you engage with the sector to set these fees.
- The rationale for increasing the hourly professional services fee is to account for inflationary increases. Our own government funding has not increased in line with inflation to reflect these proposed costs.
- Note also that EER is changing to the integrated Quality Assurance Framework (iQAF). With further detail to be determine, the costs of that change are also unknown and could also increase.
- Please consider the costs TEOs pay to administer our programmes. As an initial teacher education provider, we work with both NZQA and the Teaching Council who moderate, monitor, and review our programmes. The associated costs are significant, and we hope that these monitoring agencies are aligned to ensure we are not duplicating effort or costs.

Make submission to QAFredesign@nzqa.govt.nz by 24 June.

Key contact for Te Rito Maioha Early Childhood New Zealand: Kathy Wolfe, Chief Executive.