

9 September 2025

Consultation on changes to NZQA's fees system

We are pleased to provide further comment to the New Zealand Qualifications Authority (NZQA) on your proposed fee system changes.

Te Rito Maioha is an Incorporated Society of members committed to high quality early education for every child. Established in 1963, we are an influential leader in shaping today's early childhood sector through advocacy, policy, and delivering tertiary education qualifications and professional development programmes for current and future early childhood and primary education teachers.

Our bicultural kaupapa, te reo Māori me ōna tikanga, is embedded throughout everything we do and teach. We are committed to ensuring the success of our Pacific nation students across the motu by growing authentic relationships that embrace students' whānau and communities across our programmes.

Through our membership we advocate for early childhood education services and the kaiako who provide education to thousands of infants, toddlers, tamariki and young people. Our members are drawn from a diverse range of community-based, privately-owned, kindergarten and homebased early childhood education services and teachers.

Te Rito Maioha is a registered Private Training Establishment (PTE) with the highest rating for a tertiary provider in Aotearoa New Zealand. We are accredited and approved by the New Zealand Qualifications Authority (NZQA) to deliver a range of early childhood and primary school undergraduate, graduate, and postgraduate qualifications (levels 5-9), including specialist kaiako education, both nationally and internationally.

The organisation has delivered teacher education since 1980 and is governed by a Council made up of elected and appointed members, led by a National President and supported by a National Kaumātua. Our national office is in Wellington and our teaching staff are employed at 11 regional education centres | takiwā ako throughout Aotearoa New Zealand.

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

- increasing teachers' | kaiako knowledge of Te Tiriti o Waitangi and Aotearoa New Zealand's dual cultural heritage;
- providing access to blended delivery through online and face-to-face, with practical real-life exposure and experiences through 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 advocacy and a range of unique resources and services to our early childhood education members;
- collaborating with New Zealand and international partnerships to strengthen research and teacher education.



Consultation questions

Part One: Applying the credit reporting fee to qualifications, micro-credentials, and standards

Are there any comments or suggestions you would like to make on the proposal to reduce the credit reporting fee from \$1.37 + GST to \$1.10 + GST per credit?

As we don't deliver or report on standards, the credit reporting fee has not previously applied to us. In our response to your June 2025 consultation on fees, we noted that this represents a significant and unexpected cost. Introducing these changes from 1 January 2026 provides insufficient notice for an already stretched sector, and we have not budgeted for such expenses in the 2026 year.

We understand NZQA's Board has approved extending this fee to all qualification and micro-credential completions. Given this, reducing the fee, even slightly, is welcomed.

Proposed rules change:

Do you have any comments or suggestions for the proposal to include in the Qualification and Micro-credential Listing and Operational Rules a requirement to "pay the credit reporting fees due, by the end of the month following month of the invoice from NZQA."

This seems to be fair and standard practice/payment terms for a service provider.

Part Two: Proposed set fees for professional services

Would you prefer to move to the proposed set fees for some applications? Please explain your preference.

- Having set fees for accreditation to provide an approved programme is a positive, as otherwise there can often be lots of back and forth, which can add up quickly with an hourly rate. A set fee provides some certainty and consistency across process and cost.
- The proposed micro-credential listing, approval and accreditation fee is \$1,525, an almost 50% increase. How is this increase justified?

Would you prefer to continue to pay an hourly rate for all applications? Please explain your preference.

Our preference is the most efficient and cheapest option, but there are a lot of variables and unknowns. Much depends on individual circumstances, including the quality of the provider's application and the assessor's skills and experience.

We always work diligently to submit high standard programme applications, with few NZQA requests for further information. An hourly rate (especially with the increased hourly rate) will potentially increase costs for us.

Are there any other comments or suggestions you would like to make on the proposal to have set fees for some professional services?

- We appreciate the additional detail provided in the proposal, including the list of activities the credit reporting fee covers. There is some uncertainty around the introduction of the integrated quality assurance framework (iQAF), which is an annual process versus the four-yearly commitment of the EER. This has implications on our workload, so it is helpful to have some clarity around the financial side of this change. That said, the unknowns are worrying, given the changes coming in 2026. For instance, "Travel, contractor fees and disbursements may also be payable in some circumstances".

- We intend deliver micro-credentials for the first time in 2026. It is unclear from the proposal, relative to the funding we will receive, as to whether this will be cost-effective.
- Costs will significantly increase for us in relation to the credit reporting fee applying to all programmes. TEC funding is already constrained and will not increase funding to cover new fees.
- Please consider the costs providers pay to administer their programmes. As a provider offering initial teacher education, our programmes are moderated, monitored, and reviewed by both NZQA and the Teaching Council of Aotearoa New Zealand. The associated time, effort and costs are significant, and we hope that these monitoring agencies are aligned in their requirements to ensure we are not duplicating effort or costs.

Make submission to QAFredesign@nzqa.govt.nz by 9 September 2025.

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

