

ASSOCIATION OF EMERGENCY CARE TRAINING PROVIDERS INC

Promoting quality in emergency care training

23 June 2025

Submission on Proposed NZQA Fee Changes

Submitted by the Association of Emergency Care Training Providers (AECTP)

The Association of Emergency Care Training Providers (AECTP) welcomes the opportunity to provide feedback on the proposed NZQA fee changes. As a collective of organisations delivering high-volume, short-duration first aid training across Aotearoa New Zealand, we are committed to supporting a funding model that is transparent, proportionate, and reflective of actual work undertaken. We offer the following responses to the consultation questions:

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

Our preference is Proposal 2 (fixed cost).

Question 2. Do you support the concept of set fees for services? Please give the reason(s) for your preference.

Yes, we support the move to set fees, as this provides predictability and clarity for providers. A fixed fee structure enables better planning and avoids uncertainty around variable hourly charges. It also creates a more consistent and equitable approach to pricing across similar types of applications.

Question 3. What factors or considerations should we consider in determining set fees?

Set fees should reflect the complexity, risk, and volume of the service being provided. For example, simpler and frequently submitted applications (such as minor changes to existing approvals) should attract a lower set fee than complex, bespoke approvals. Also, fees for site visits, EER (or their replacement process) and similar processes should reflect the size of the PTE and the nature and complexity of their area of education. Where compliance requirements are well-defined through measurable criteria, fees should reflect the comparatively small resource requirements.

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.

Yes, First Aid Training providers primarily deliver standard based training and are therefore paying a higher proportion of Fee's than TEO's that don't.

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.

Yes, we support the inclusion of micro-credentials.

Question 6. What additional factors or considerations should we consider in extending the credit reporting fee to all qualifications, micro-credentials, and standards?

We understand that NZQA allows providers to report both micro-credentials and associated unit/skill standards for the same learner, with each separately listed on the NZQCF and credit reported. However, this can lead to duplicate reporting fees for the same learning. We request that NZQA clarify its preferred approach in cases of overlap—such as whether providers should select one pathway or if fees should be adjusted to avoid double charging

NZQA should publish the total revenue generated by credit-reporting fees, broken down by credential type and sector. This will ensure the cost burden is visible and can be assessed for fairness.

NZQA has a responsibility to operate in a fiscally responsible manner and ensure that any efficiencies or cost savings achieved through changes to its fee structure are reflected in reduced or stabilised costs for Tertiary Education Organisations.

Thank you for considering our feedback. We welcome any further discussion or clarification as needed.

Please direct all communication to Bianca Petrie, our Executive Officer via email bianca@aectpnz.org

Ngā mihi,



Simon Barnett,

Chair of the Association of Emergency Care Training Providers (AECTP)