



Submission on: Proposed updated and new Teaching Council fees for services to ITE providers

From: TEACHER EDUCATION FORUM OF AOTEAROA NEW ZEALAND | TE RAUIKA TITOHU KAIAKO O AOTEAROA (TEFANZ)

TEFANZ is an ITE provider membership organisation fostering, promoting, and advocating for:

- High quality, degree level teacher education programmes for early childhood, primary, secondary, and Māori medium
- Teacher education as a means to implement a commitment to Te Tiriti o Waitangi/The Treaty of Waitangi
- The role of teacher education in contributing to community and environmental wellbeing
- Partnership, cooperation and collaboration within the teacher education profession and with the wider education community, nationally and internationally
- Teaching as a graduate profession

The elected executive of the organisation has a responsibility to contribute to the national voice for teacher education issues and as such has read and responded to the Teaching Council's proposal for fees and services charges. Questions about this submission may be directed to: [Rosina's details here]

TEFANZ Submission on Teaching Council's Proposed Updated Fees and Services for ITE Providers. December 2022.

Do you accept the rationale for the proposed increase in fees? If not, why not?

The partnership between providers and the Teaching Council is underpinned by a culture of high-trust and collegiality, which recognises that ITE providers are consistently working on a programme of self-review, evaluation and improvement. However, in its current state, we find the proposal seems incongruent with the above values.

The proposal does not seem to provide a true and accurate reflection of the different streams of work involved in ITE associated processes and approvals, and who takes lead responsibility on them. Equally there has been no consideration given to alignment between the

programme approval and reapproval processes that the ITE sector simultaneously undertakes in conjunction with CUAP or NZQA. As providers we have no option but to work with the Teaching Council given the Council has a monopoly on approval of programmes. As providers we are forced to “use” the “services” and as a result would have little choice but to accept the “reasonable” pricing, as detailed in appendix one.

We think it would be appropriate, given the work being done around monitoring, review and moderation, that costs in relation to programme approval and changes were considered as part of this broader discussion, as opposed to framed separately.

The application of a fixed rate does not account for the variation across the sector in terms of programme or provider size. While we appreciate that programmes are all subject to the same criteria and processes, the size of provider and programme have a direct bearing on income generation and so, due to size variation the process may overburden some providers. Perhaps consideration of a scale, with bearing on size and ITE EFTS might be more appropriate?

Being charged at these higher rates would come with the expectation of a service model where systems, reporting processes, documentation were all streamlined, end-user friendly and expedient. As providers we are beholden to the platforms and processes of the Teaching Council and would expect a better service given the higher rates charged.

Do you agree with the basis of the calculation of proposed new fees? If not, why not?

While we recognise the Teaching Council has to recoup some costs and operate on a cost recovery basis, we do not agree with the proposed new fee structure. For providers with a track record of submitting programmes for approval, the need for support from a lead advisor will be significantly less and therefore a flat rate does not reflect varying levels of experience or quality. It would seem that an hourly rate (with an agreed upon cap) would be more appropriate in reflecting the varying support needs for different providers. A capped hourly rate model could provide for providers’ needs in terms of budgeting for lead advisor costs.

We note that the proposal does not factor in mahi associated with multiple programme approvals by the same provider, given that these may be almost identical or very similar, economies can be made and full approval panel processes for each separate programme avoided, it would seem important to give consideration to this.

What changes might result from the proposed new fees?

We understand the need for the Teaching Council to find income streams in order to finance its operations. However, if we are to move to a payment schedule that requires fees for every change (8.8) this may result in a shift where providers feel less inclined to communicate minor changes with the Teaching Council and instead only engage for significant programme changes. We do not believe this is conducive to good models of practice between our providers and professional body - it may reduce transparency in relation to current programmes and practices; as such the fee schedule has the potential to create a move from a “we are a team” supporting the development of teachers model and we fear it would undermine the way we as ITE providers want the profession to work.

If the Teaching Council introduces these new ITE fees these costs would need to be recouped by providers. This may result in fee increases by some providers being passed on to students. In this new proposal there is a risk for providers that instead of money being invested in development and enhancement of existing programmes money will be diverted for administrative costs to the Teaching Council for their ITE fees. It should also be noted that we will not get additional funding from TEC in relation to supporting the approval process and it could become unaffordable for smaller providers.

Do you have any suggestions for alternative ways of structuring or recovering our costs?

A preferred model would be the potential for providers to pay an annual fee (pro-rata) that would cover matters related to small programme changes, exemptions etc. In line with this we would like to see classification of minor changes (Type 1) vs new approvals which would be deemed a major change (Type 2). Type 1 changes should not incur a cost and instead be viewed as part of the ongoing improvement cycle with changes simply noted as received by the Council when reported. We would expect that the changes be specified clearly for full transparency.

For panel related matters, an hourly rate model would more accurately reflect the costs for each individual panel for providers, given the variation of the quality of proposals.

Minor changes to programmes could be documented as part of the interim monitoring cycle and attract no further fee.

In the way appendix one is presented there is not a clear breakdown of all aspects of the work which would allow providers to be able to identify which aspects they could pick up (panel agenda, organisation of the panel) - we would prefer a more nuanced or itemised approach, so it was clear what was being paid for and what services the Council were accountable to providers for supplying.

Teaching Council presentations to students have been built into programmes previously to support Teaching Council in their work as the governing body for teachers and have little direct benefit to the ITE provider. If we are to be charged for these then they are unlikely to occur. Furthermore, the Council has the capacity to develop the material once for distribution across the sector, and so multiple charging for essentially the same product seems unnecessary and questionable.

Teaching Council should consult and collaborate with CUAP/NZQA regarding their moderation and review processes along with their fee structures. In an ideal world these processes would be aligned so that providers only had one simultaneous or connected "panel" approval and amendment process. This is a view that TEFANZ and other organisations have maintained for years; it seems like the Council has an opportunity, here, to move in this direction finally and we would encourage this.

Finally, the fee proposal outlines that the monitoring, review and moderation work is still underway and there could be some cost to be passed onto providers once decisions are made. For this reason, it is recommended that the fee structure work be halted for now and considered alongside as opposed to independent from the monitoring, review and moderation work. This way providers can be advised of the cost implications in their entirety as opposed to in a piecemeal manner.