



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

SECTION 3.2

Green Paper on Fees for QQI Services

FOR CONSULTATION

QQI welcomes your views.

If you have suggestions regarding any aspect of the content of this proposed Policy Document please use the *Questions and Comments* area which appears immediately after it.

PLEASE NOTE:

7 JUNE 2013

CLOSING DATE FOR SUBMISSIONS

SECTION 3.2

Green Paper on Fees for QQI Services

3.2.1 Introduction

This Green Paper is intended to inform the development of a policy on fees and the underpinning schedule of fees for services to be provided by QQI. The Qualifications and Quality Assurance (Education and Training) Act 2012 (hereafter the 2012 Act) specifies the services for which fees may be charged. This is a departure from the Qualifications (Education and Training) Act 1999.

3.2.2 Legislative and Organisational Context

Section 80 of the 2012 Act identifies fifteen services to be provided by QQI for which fees may be charged:

1. Approval of the quality assurance procedures established by relevant providers, other than previously established universities.
2. Review of established quality assurance procedures and the implementation of those procedures by a relevant provider.
3. Undertaking a quality assurance review on behalf of a designated awarding body.
4. Review of the effectiveness of the review procedures established by the National University of Ireland (NUI) and the implementation of those review procedures by NUI.
5. Validation of a programme of education and training.
6. Review by QQI of a validated programme.
7. Making awards to learners and providers.
8. Application for delegation of authority in respect of specific programmes.
9. Approval of an application by a provider for delegation of authority to make awards.
10. Review of delegation of authority to make awards.
11. Approval of procedures for access, transfer and progression in relation to learners.
12. Review of procedures for access, transfer and progression in relation to learners.
13. Authorisation of the use of the International Education Mark (IEM) by a provider who complies with the established code of practice.
14. Review of a provider's compliance with the code of practice for the IEM and the provider's use of it.

15. Lodging an appeal under the 2012 Act.

In addition to the above specified fees, *Section 62* provides for an annual charge in respect of the International Education Mark (IEM). The 'annual charge' (maximum €50k) technically differs from the agreement and implementation of fees. The fees and annual charge proposed by QQI require the approval of the Minister for Education and Skills and the Minister for Public Expenditure and Reform.

The previous legislation had provision for the various bodies to charge fees in relation to their functions, but the individual policies and practices in relation to fees varied across the organisations. This varied practice has led to different expectations of our providers in respect of the potential level and range of fees to be applied.

The 2012 Act is specific in terms of the services for which fees may be levied. A fee cannot be charged for any statutory functions not indicated on the list of functions above.

3.2.3 Public Policy Context

There is an expectation from government, that given the critical state of the finances of the country, state agencies will be more responsible than heretofore for cost recovery for public services. State agencies may in future be judged and resourced on their ability to deliver and account for outcomes based on agreed targets and using statutory fees in ways that will promote cost transparency and efficiency.

3.2.4 Current and legacy fee arrangements

For fees authorised by the Minister in the current transitional context, please see Appendix A. These will continue until such time as new fees are approved by the Minister. Fees formerly charged that are no longer current are listed in Appendix B for information. It is envisaged that fees will apply under the policy to be established for Provider Access to Programme Accreditation (as discussed in Section 2). QQI will be submitting a draft schedule of fees to the Minister for approval, to enable these functions to be implemented in September 2013.

3.2.4.1 Quality Assurance Services

Relationship fees were paid by the seven universities to IUQB for its services. Relationship fees were also paid by the Institutes of Technology to the HET Awards Council for the range of services provided. These fees were agreed on an annual basis and approved by the Minister.

Providers of programmes leading to HETAC awards paid for the initial assessment of their quality assurance policy and procedures and for programme validation, including validation of programmes leading to joint awards.

Providers of programmes leading to FETAC awards did not pay fees in respect of their engagement with the FET Awards Council, except for certification.

Recognised English Language Teaching Organisations (ELTOs) paid fees for a range of services.

3.2.4.2 Certification (Award) Fees

Certification fees are paid by learners, through the providers, in respect of their programmes of study leading to FETAC and HETAC awards. In the context of further education and training, certification fees apply only to programmes at level 5 and level 6 on the National Framework of Qualifications (NFQ).

Certification fees are also paid by the Accreditation and Co-ordination of English Language Services (ACELS) sector.

3.2.4.3 Alignment Fees

Fees for the alignment of the awards of non-Irish awarding bodies within the NFQ were paid to NQAI in respect of this service. Fees were payable by professional bodies to the HET Awards Council for the alignment of their awards to the NFQ. Fees were also payable by providers (other than those who already had approval to provide programmes leading to HETAC awards) for the approval of tax relief on fees paid in respect of their programmes.

3.2.5 Anticipated External Expectations

It is reasonable to assume that the new fee structure may give rise to increased expectations in relation to the quality and timeliness of services provided.

The range of QQI services to which fees will apply will be extensive and therefore some providers, particularly those in the further education and training sector, may be concerned regarding the possibilities in this regard and the level of fees which may be payable. A requirement for further education and training providers to pay fees, for services other than certification, would mark a new departure for them.

As noted above, both professional and international bodies, who have sought alignment/recognition of their qualifications within the NFQ, from either the HET Awards Council or NQAI, have paid fees. These bodies have been made aware that there is no provision in the 2012 Act to charge for any alignment/recognition services provided by QQI.

3.2.6 Rationale for Policy Development

QQI is required to submit a schedule of fees to the Minister for agreement. QQI has therefore decided to develop a comprehensive policy on fees. This will provide clarity and transparency in respect of:

- The level of fees to be charged in respect of the range of specified services.
- Any possible variations in fees across different providers.
- A rationale for exemptions and waivers.
- Penalties for late payment of fees and charges.

3.2.7 Issues and Options

3.2.7.1 Level of Fees

A clear basis for charging fees across the range of services identified should be established, e.g. level of fees could be based on cost. The 2012 Act provides for different processes for different providers according to size of provider and/or complexity of the related process. It also makes provision for a range of fees for different classes of providers. Any variation in fees should be justified.

If fees are set at a high level some potential providers may not be able to afford to engage with QQI. If fees are set too low, providers may be tempted to engage with QQI

speculatively. Fees could be pitched at a relatively high level in order to deter providers from engaging with QQI until they are fully prepared.

Q3.2.a Should a range of fees be established for each service, i.e. should fees vary across classes of providers? If so, what might be the possible factors which could justify potential variations?

Q3.2.b Should flat fees be considered for each service, i.e. should there be a single fee for each service, irrespective of the nature of the provider or NFQ level of the provision?

Q3.2.c Should the level of fee for any service relate to the NFQ level of the awards which a provider offers?

Q3.2.d Should fees be used as a mechanism to incentivise or dis-incentivise engagement with QQI?

Q3.2.e Should the fee policy provide for a partial refund where a provider is fully prepared for its interaction with QQI and the service can be delivered with maximum efficiency?

Q3.2.f Should fees reflect in some measure the cost of the resources required to provide an effective service?

[Click here or click on respective bookmark to respond >>](#)

3.2.7.2 A Composite Fee or Separate Fees

The 2012 Act identifies a range of services for which fees should be charged. It also provides for QQI to conduct one or more reviews at the same time. Provision therefore could be made for a composite fee which is less than the total of the single individual fees.

An annual 'relationship' fee/ subscription could be considered for all providers availing of QQI services. Such a fee/subscription would be similar to the 'relationship' fee paid by the universities to IUQB and the Institutes of Technology to the HET Awards Council. The fee would reflect the totality of the relationships which a provider would have with QQI over a period and would be equalised over a number of years. Such an option may provide for more accurate financial planning for providers.

Q3.2.g Should a composite fee be charged when QQI conducts one or more reviews at the same time? What factors should QQI consider when determining the composite fee?

Q3.2.h Would it be preferable to have a relationship fee/annual subscription which would remain relatively static over a defined period of time, i.e. a 5 year period?

[Click here or click on respective bookmark to respond >>](#)

3.2.7.3 Exemptions/Waivers/Penalties

The legislation provides for exemptions and waivers. Currently, fees, other than certification fees, are not paid by providers of further education and training awards. Certification fees are not payable in respect of awards at level 4 and below on the NFQ.

Q3.2.i In what circumstances should exemptions from fees for QQI services or waivers apply?

Q3.2.j Should certain categories of providers be exempt from paying fees? If so, what are these categories?

Q3.2.k Should exemptions apply to services which relate to the provision of awards up to and including level 4 on the NFQ?

[Click here or click on respective bookmark to respond >>](#)

3.2.7.4 Certification Fees

Currently, certification fees are payable in respect of further education and training awards at levels 5 and 6 of the NFQ. A different set of certification fees (award fees) are payable in respect of higher education and training awards at level 6 to level 10 on the NFQ.

Certification fees are not payable in respect of awards at levels 4 and below on the NFQ. The actual cost of producing a certificate is the same regardless of the NFQ level of the award, however, the quality assurance apparatus which underpins an award may differ according to the complexity of the process.

Q3.2.l Should the cost of certification to the learner/provider be the same irrespective of the level of the award in question?

[Click here or click on respective bookmark to respond >>](#)

Appendix A

Legacy body fees authorised by Minister for use by QQI on commencement of 2012 Act

FET Awards Council

Service	Fee €
Certification fees	
- Major awards at level 5 and level 6	50
- Component/specific purpose/supplemental	20

National Qualifications Authority of Ireland

Service	Fee €
<i>ACELS registration fees¹</i>	
- Provider with adult classes	870
- Provider with junior classes and a minimum of 11 classes in the main centre	870
- Provider with junior classes and a maximum of 10 classes in the main centre	520
- Additional centres	280
<i>ACELS Inspection Fees</i>	
- Centre of 8 classes or fewer	300
- Centre of 9 classes or more	600
- Follow-up inspection (including spot checks)	300
- Appeal Fee	All costs associated with the appeal
Approval to provide English language teacher training programme	525
Annual renewal of the approval to provide teacher training	525
Certification fee for the Test of Interactive English (including ETAPP)	20
Certificate of English Language Teaching (CELT), Prep ELT Certificate and replacement Certificates	35
Verification of non-national ELT awards and their equivalence for employment purposes	35

¹ Fees apply to the initial application for recognition and to the annual renewal of recognition.

HET Awards Council

Service	Fee €
Provider registration	3,500
Programme validation - Major awards	7,000
Where the validation extends beyond 1 day an additional fee per day will be payable	3,500
Programme resubmission	3,500
<i>Programme validation - Minor, Special Purpose, Supplemental awards</i>	
Awards comprising up to 50 credits	3,500
Awards comprising 60 or more credits	7,000
Where the validation extends beyond 1 day an additional fee per day will be payable	3,500
Programme resubmission	3,500
Differential programme validation	3,500 ²
Programme validation - Joint Awards	3,500 ³
Where the validation extends beyond 1 day an additional fee per day will be payable	3,500
<i>Assessment for tax relief purposes per programme</i>	
- For HET Awards Council Registered Providers	2,000
- For non-HET Awards Council Registered Providers	3,500
- institutional assessment	1,500
- for each additional location	2,000
- per programme	
<i>Awards Fees⁴</i>	
Higher Certificate	80
Ordinary Bachelor Degree	120
Honours Bachelor Degree	160
Higher Diploma	200
Masters Degree/Post-graduate Certificate	200
Minor, Special Purpose, Supplemental Awards	40

² In respect of overseas differential validations, the Provider will be charged all vouched expenses including those relating to travel and subsistence for Panel members and Council executive.

³ This applies per programme, or where a single Panel evaluates a group of cognate programmes. In respect of overseas Joint Awards the Provider will be charged all vouched expenses, including those relating to travel and subsistence for Panel members and Council executive.

⁴ The fee is increased by 50% for late registrations. The fee for repeat purposes is 50% of the original fee.

Appendix B

Fees charged by NQAI and the HET Awards Council in respect of alignment prior to the commencement of the 2012 Act

National Qualifications Authority of Ireland

Service	Fee €
<i>Alignment</i>	
Number of qualifications submitted	
- 1 – 50	2,000
- 51 – 100	2,500
- 101 – 300	3,300
- 301 +	4,300

Higher Education and Training Awards Council

Service	Fee €
Alignment of Awards – Group B bodies	7,000

Questions and Comments

SPECIFIC CONSULTATION QUESTIONS

Q3.2.A Should a range of fees be established for each service, i.e. should fees vary across classes of providers? (Section 3.2.7.1)

yes

no

If so, what might be the possible factors which could justify potential variations?

Q3.2.B Should flat fees be considered for each service, i.e. should there be a single fee for each service, irrespective of the nature of the provider or NFQ level of the provision? (Section 3.2.7.1)

yes

no

Q3.2.c Should the level of fee for any service relate to the NFQ level of the awards which a provider offers? (Section 3.2.7.1)

yes

no

Q3.2.D Should fees be used as a mechanism to incentivise or dis-incentivise engagement with QQI? (Section 3.2.7.1)

yes

no

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Questions and Comments

SPECIFIC CONSULTATION QUESTIONS

Q3.2.E Should the fee policy provide for a partial refund where a provider is fully prepared for their interaction with QQI and the service can be delivered with maximum efficiency? (Section 3.2.7.1)

yes

no

Q3.2.F Should fees reflect in some measure the cost of the resources required to provide an effective service? (Section 3.2.7.1)

yes

no

Q3.2.G Should a composite fee be charged when QQI conducts one or more reviews at the same time? (Section 3.2.7.2)

yes

no

What factors should QQI consider when determining the composite fee?

Q3.2.H Would it be preferable to have a relationship fee/annual subscription which would remain relatively static over a defined period of time, i.e. a 5 year period? (Section 3.2.7.2)

yes

no

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Questions and Comments

SPECIFIC CONSULTATION QUESTIONS

Q3.2.I In what circumstances should exemptions from fees for QQI services or waivers apply? (Section 3.2.7.3)

Q3.2.J Should certain categories of providers be exempt from paying fees? (Section 3.2.7.3)

yes

no

If so, what are these categories?

Q3.2.K Should exemptions apply to services which relate to the provision of awards up to and including level 4 on the NFQ? (Section 3.2.7.3)

yes

no

Q3.2.L Should the cost of certification to the learner/provider be the same irrespective of the level of the award in question? (Section 3.2.7.4)

yes

no

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Questions and Comments

GENERAL CONSULTATION QUESTIONS

Q3.2.M Are there other options that have not been considered in this Green Paper?

Q3.2.N Are there advantages and disadvantages that have not been identified for each option?

Q3.2.O Do you have any preferences among the options?

Q3.2.P Do you have any comments on the issues raised in the Green Paper?

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Which sector do you work in?

If other please describe here

Contact email address

If you are satisfied with your comments please send them to us now by clicking the *Submit* button below.

You can also give feedback to QQI at: consultation@qqi.ie

Thank you for your time!