Mr Luke Sheehy
Chief Executive Officer

16 October 2026

Dr Mary Russell
Chief Executive Officer
Tertiary Education Quality and Standards Agency

Dear Dr Russell

Response to TEQSA's fees and charges consultation

I'm writing to provide Universities Australia's (UA) feedback on the Tertiary Education Quality and Standards Agency's (TEQSA) proposed changes to its fees and charges under the Cost Recovery Implementation Statement (CRIS).

While we appreciate the opportunity to comment, I must reiterate our previously raised concerns about short consultation timeframes. Recent examples have included two weeks for Statements of Regulatory Expectations relating to racism and 11 days for the previous consultation on cost recovery. This consultation provides little over a week for providers to consider changes to fees and charges with significant financial implications. This timeline does not allow sufficient time for meaningful consideration and feedback and should be reconsidered for future consultations.

We refer to our responses to recent guidance notes consultations and the 2026 fees and charges consultation in which we called for greater transparency and more meaningful engagement with the sector.

UA continues to hold concerns with government committing to additional cost-recovered expenditure through MYEFO and budget processes without prior consultation with affected providers. The $9.6 million allocated to TEQSA over four years through the 2026-27 federal budget, following the $7.6 million allocated through the 2024-25 budget represents a significant expansion in the operating budget of the agency. Universities should have a say in decisions that directly increase their regulatory costs. We urge that any additional recoverable funding be discussed with providers in advance of a budgetary decision.

The examples provided indicate that Australia's universities will be particularly impacted by the proposed changes. For the university example provided, the annual RHEP charge would increase by 57 per cent, taking it to almost $120,000. UA recommends that a more risk-based approach to the RHEP charge be pursued by TEQSA, as EFTSL is too blunt a measure to allocate sector-wide risk. Institutional size does not necessarily reflect regulatory risk or the level of oversight required.

The tiering of compliance assessments into simple and complex similarly disadvantages universities, which due to their size and scale are more likely to require a greater number of assessment hours. This

risks imposing higher charges on institutions because of their complexity rather than their regulatory risk.

UA also seeks further clarity on the circumstances in which TEQSA will undertake a quality assessment. Given that this now attracts a $22,000 charge, universities need greater certainty about how quality assessments are identified, initiated, progressed and resolved similar to what is provided for compliance assessments through the Compliance Monitoring Framework. This guidance should be available before the new charge takes effect.

We would appreciate further engagement with TEQSA regarding cost recovery to ensure that fees and charges are appropriately justified and allocated. In particular, universities need greater transparency about the costs being recovered and confidence that charges are proportionate to the regulatory activity undertaken.

Yours sincerely

Mr Luke Sheehy
Chief Executive Officer, Universities Australia