



COVERSHEET

Minister	Hon Dr Shane Reti	Portfolio	Science, Innovation and Technology
Title of Cabinet paper	Transitioning health research funding from the Health Research Council to Research Funding New Zealand	Date to be published	9 April 2026

List of documents that have been proactively released		
Date	Title	Author
November 2025	Transitioning Health Research Funding from the Health Research Council to Research Funding New Zealand	Offices of the Minister of Science, Innovation and Technology, and of the Minister of Health
12 November 2025	Transitioning Health Research Funding from the Health Research Council to Research Funding New Zealand ECO-25-MIN-0185 Minute	Cabinet Office
5 November 2025	Future of Health Research Funding: Decision Making and Allocation RIS	MBIE and MOH
5 November 2025	RIS Annex 2 - Cost Recovery for a Fast-track Research Ethics Review Process	MBIE and MOH
3 December 2025	RIS Quality Assurance Feedback Form and QA Criteria	MBIE and MOH
14 August 2025 – 5 November 2025	Briefings on the Future of Health Research Funding	MBIE and MOH

Information redacted

YES

Any information redacted in this document is redacted in accordance with MBIE's policy on Proactive Release and is labelled with the reason for redaction. This may include information that would be redacted if this information was requested under Official Information Act 1982. Where this is the case, the reasons for withholding information are listed below. Where information has been withheld, no public interest has been identified and that would outweigh the reasons for withholding it.

Some information has been withheld under the grounds of commercial information, confidential advice to Government, and confidential commercial information (trade secret).

RIS Quality Assurance - Feedback Form and QA Criteria

This form simplifies collation of Quality Assurance Panel feedback on the quality of Regulatory Impact Analysis. It can be used for any Regulatory Impact Analysis document. For general guidance on RIS quality assurance see our [Intranet Page](#), and for information specific to each type of document see guidance and the latest templates on the [Ministry for Regulation](#) site.

This form consists of five parts in two sections:

Section 1: RIS documents

1. Detailed feedback: this covers key points for the panel to consider in assessing the content. Panel members can use this section to guide their review and capture feedback for the authors.
2. Quality Assurance Criteria: these are the four criteria that a QA panel must use to rate the RIS.
3. Advice on preparing a quality assurance statement

Section 2: Discussion Documents

4. Quality Assurance Criteria for un-narrowed discussion documents
5. Advice on preparing a quality assurance statement specific to un-narrowed discussion documents

Part 1: Detailed Feedback

Use this section to consolidate the Panel's specific comments on the RIS, to be provided to the authors. Focus on the changes that could be made to improve the document.

Part 1: Detailed Feedback					
Section	Considerations	First Review QA level	How to improve this section	Second Review QA level	Final comments
Status Quo & Problem Definition	Is a problem identified and explained?	Adequate	<p>There does seem to be a gap about why in-principle decisions were made in the first place, being able to understand the problem that these decisions were trying to solve would be useful. <u>Then</u> can be clear that the policy problem addressed by this RIS is to make changes to legislation to give effect to Cabinet decisions.</p> <p>Needs to be clear on what the current functions of the HRC are (essentially as per annex).</p> <p>Some duplication of wording which could be addressed to make this section crisper and clearer.</p> <p>Not completely clear why the ethics review is being included within this RIS. Would be good to have this more clearly explained.</p>	Adequate	Could still be tighter, but not an issue for the purpose of the document. Did include the ethics piece at the start.
	Does the problem need to be addressed?				
	Is the problem clearly described?				
Objectives	Do the objectives describe the desired outcome?	Good	Objectives are clear – achieving all of these will get the desired outcome	Good	

	Will the objectives identify the best option?				
	Is it clear how the objectives will be applied?				
Options Analysis	Are all possible options identified and described?	Needs work	<p>For section 2 -suggested changes:</p> <ul style="list-style-type: none"> option 1 should come out (this option seems to reflect a continuation in HRC’s funding function which is inconsistent with the Cabinet decisions to consolidate public research and the in-principle decision to transfer health research funding from HRC to RFNZ. Options that retain HRC’s funding role are noted as being out of scope). option 2 be the SQ option 3 is fine option 4 could be what has been discarded as mentioned in para 75 – it would be good if there was a couple of paras in the options section that outline what this could look like. <p>OR could be clear why there are really only 2 options (current option 3 and status quo). The discussion of option 3 would benefit from more information about which current HRC functions are going to where <i>and</i> whether the new functions will have a legislative basis (either new or amended) or not.</p> <p>The options analysis in 2.1 could be clearer about what the differences are between option two and three e.g. is option three also including a fast-track route?</p> <p>Option 3 is painted very positively, Are there no potential risks/downsides? What about the potential inequity between having two different approval tracks? Risk those unwilling/unable to pay or unable to commercially do so being deprioritised and having longer approval timeframes?</p>	Adequate	<p>The tables still don’t add up – Query re overall assessment. Should be either: Option 1: 1x negative (ordinal) or 4x negative (cardinal) Option 2: 1x positive (ordinal) or 3x positive (cardinal). [same issue for table of 2.1]</p> <p>Need to state how these have been ranked (which is better or worse) – or is one of the criteria weighted?</p> <p>Change to options looks clearer.</p> <p>Option 2A is good to have included & rational for not continuing is clear Improved discussion of implementation risks re.option 2.</p> <p>Does option 3 in 2.1 include a fast track route?</p>
	Has the best option been selected?				
	Is the analysis of options presented consistently?				

			Need more analysis in summary tables – unsure about how these have been rated e.g. ease of transition for options 2/3 for first problem, moving functions is relatively hard so doesn't marry up with the rating. The 'overall assessment' row does not match the scoring either – suggest clarifying calculation method. There are also specific comments on the tables from panellists in the document.		
Implementation, Monitoring, Evaluation and Review	Is an implementation path identified and explained?	Adequate	<p>Could be useful to outline a clear timetable that shows by X, Y will occur as while this section is good at outlining who/what but not the when.</p> <p>Would be good to show what goes where – realise this is in Annex One but a diagram would be easier to interact with.</p>	Good	Points have been well addressed.
	Is the implementation path realistic?				
	Are the implications clear for affected parties?				
Consultation (included throughout the analysis)	Is it clear who has been consulted and what form the consultation has taken?	Needs work	This is occurring at present but appears to be a good list of stakeholders.	Adequate	<p>Included new stakeholder feedback, indicated reasons for limitations & state that more engagement will be ongoing.</p> <p>Is hard to see how proposal has been shaped through consultation – feels that consultation is more important for future state. Would have been good to understand how concerns have been addressed.</p>
	Is key feedback summarised, with any significant concerns raised about the preferred options?				
	Has the proposal been altered to address feedback? If not, why not?				
	If there was limited or no consultation undertaken, have the reasons for this been explained?				
Other feedback	Provide any other feedback for the author here, including notes on whether the document is clear and concise overall.	Needs work	<p>Feedback on CRIS – table 2, footnote 11, how robust are the numbers? Could be wiser to test the numbers (particularly for fast track).</p> <p>Para 16 – what is the additional committee for? Given that there is also to be a 'floating' committee responsible for fast-track applications. This needs to be explained.</p>	Adequate	<p>Extra commentary around volume estimates is good.</p> <p>Some improved discussion of the additional HDEC committee and 'floating' committee. Still not entirely clear why 2 extra committees may be needed when it</p>

		<p>There is a difference between the estimated costs vs. revenue - if there is a desire to build a buffer, that would be good to call out as the CRIS currently refers to a net balance of zero.</p> <p>If volume is increasing – this will not be true cost recovery so when will fees be revisited/who will be monitored? How will fees react to higher/lower volumes?</p> <p>What is the level of flexibility of the scalability of resources? For all of these – can say that they will look at this in the future, noting they need to carry out a CRIS 2.</p>	<p>seems the cost-recovery approach will not change total demand for ethics approval, CRIS does not indicate the fast-track will increase demand compared to no-fast-track. Therefore we assume any increase in fast-track ethics approvals has a 1-1 reduction in ‘standard’ ethics approvals.</p> <p>Costs and revenue net to approximately zero.</p> <p>Extra commentary on scalability and risks of under-recovery / excess demand included.</p>
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Part 2: Quality Assurance Criteria

All RIS are quality assured against four criteria. Use the detailed feedback above to inform this overall QA rating.

Part 2: QA Criteria		First Review: overall comments	Second Review: overall comments
Complete	Is all the necessary information in the Regulatory Impact Statement, as set out in the relevant template?	Yes, through the document several recommendations about extra information (or how things could be presented) to make this a bit easier for readers. Minor improvements can be made to options in section 2.	No further comment
Convincing	Is the analysis accurate, robust and balanced?	Minor improvements to options in section 2 are required	Improvements have been made to help this be more convincing
	Are the analysis and conclusions supported by the analytical framework, and a commensurate assessment of costs and benefits and supporting evidence?		
	Do the assumptions make sense?		

Consulted	Does the RIS show evidence of efficient and effective consultation with stakeholders, key affected parties and relevant experts?	This is still to occur and the RIS will be updated following this, there does appear to be a good range of stakeholders that will be consulted with.	Yes, consultation has occurred – just not quite clear on how feedback has been considered and used in analysis. Likely to be more useful in the further work to come.
	Does it show how any issues raised have been addressed or dealt with?		
	Has reasonable time has been given for comment? Ministry for Regulation recommends 60 days as the starting default minimum for public consultation. Is justification provided if it is less than 60 days?		
Clear & Concise	Is the material communicated in plain English?	Would be improved with a crisper problem definition (this is repeated quite a few times). Summary should be 4 pages, so this should be shorted.	Yes – should try and make the summary 4 pages. Would suggest a QA of the document (spelling, formatting etc.) before it is submitted to Cabinet.
	Is the RIS an appropriate length?		
Overall QA rating of document		Partially meets	Meets

In forming a view on the document's rating, the Panel needs to consider the context of the decisions being taken (are they in-principle or final policy decisions?) and any constraints or limitations that have been identified or disclosed that may compromise the quality of the analysis. If one of the main QA criteria (such as consultation) is absent, even if the author can give a compelling reason for such an absence, then the paper cannot fully meet the Criteria and there is an effective ceiling of Partially Meets.

Does not meet

- The Regulatory Impact Statement falls short of the standard on more than one aspect, or a key component is inadequate.
- A “does not meet” rating is effectively a judgement that the Regulatory Impact Statement does not contain sufficient information and analysis to allow Ministers to take a properly informed decision on the matters they are currently being asked to decide.

Partially meets

- Meets the quality standard on most dimensions.
- The RIS has one particular deficiency that should be highlighted and explained. The assessors may make a recommendation as to how the deficiency could potentially be addressed.
- A “partially meets” rating is effectively a judgement that there are deficiencies in the information and analysis provided. However, if Ministers are made aware of that, take that into account and are willing to take a risk in the circumstances, they might still be able to make a reasonably informed decision.

Meets

- Meets the quality standard, however there may still be scope for comment on what has been done well and what could have been done better.

Part 3: Advice on preparing a Quality Assurance Statement:

The outcome of the quality assurance process is a formal statement from the assessors on the quality of the impact analysis which is inserted into the RIS document. RIS authors must copy this statement (without edits) into the “Impact Analysis” section of the Cabinet paper.

The Quality Assurance Statement provides Ministers with an independent view on the extent to which they can rely on the analysis in the Regulatory Impact Statement to help them make an informed decision on the regulatory proposal. This is a statement about the content of the Regulatory Impact Statement and the robustness of the process for its development. It is not a comment on the merits of the regulatory proposal or recommended regulatory option (as this remains the responsibility of the policy team).

QA Panels should prepare a draft quality assurance statement at the conclusion of their review and send this to RIARP@MBIE.govt.nz.

There is no set format, but the Quality Assurance Statement may follow the suggested structure:

A Quality Assurance Panel from MBIE [and x Ministry if a joint panel] has reviewed the Regulatory Impact Statement (RIS) prepared by [name of agency] titled [name of paper *(and associated supporting material if relevant)*] on [date].

The Panel consider that the information and impact analysis summarised in the RIS **meets / does not meet / partially meets** the Quality Assurance criteria.

[Explanation of the above rating and constructive comments to highlight to the decisionmaker any issues that have been identified in relation to any of the dimensions of the QA criteria. For example, where the assessment is that the RIS “does not meet” or “partially meets” the criteria, state:

- the areas that “do not meet” and the impacts of these areas on the robustness of the advice to support to Ministers’ decision making, or*
- comment on how the policy proposal could be moved forward or put on more solid foundations (e.g. further analysis of a particular issue, consultation with certain stakeholders, or careful monitoring and preparedness to take further action if necessary).]*

Section 2: Quality Assurance for Discussion Documents

Cabinet agreed in November 2024 to streamline the requirements for some discussion documents. Cabinet’s RIA requirements only apply to discussion documents that include regulatory options and require Cabinet to approve their release for public consultation. See guidance note [Impact Analysis Requirements for Discussion Documents](#)

There are two possible pathways depending on whether the options in the discussion document have been narrowed:

1. **The options are narrowed.** A separate **interim RIS** is required covering the full range of feasible options or else the impact analysis requirements will not be met. The interim RIS must reviewed by the panel against the Standard QA Criteria (above). The panel should be provided with a copy of the discussion document for context.
2. For Discussion Documents where the **options are not narrowed** and there is a full range of feasible options considered, QA panels only need to consider whether the discussion document supports effective consultation and enables future impact analysis. The content of the discussion document is reviewed by the agency’s quality assurance panel against the discussion document QA criteria (see below). The rating is either ‘meets’ or ‘does not meet’.

Part 4: QA Criteria for un-narrowed discussion Documents

Part 3: Un-Narrowed Discussion Document QA Criteria		First Review: Discussion Document comments	Second Review: Discussion Document comments
Plain Language	Is the discussion document written in language that is appropriate for the intended audience?		
	Is it clear, concise, and well-organised?		
	Is the level of detail and complexity appropriate for the audience?		
	Is the length of the document proportionate to the magnitude and proposed impact of the proposal?		
Clear Scope and Objectives	Is it clear what is in and out of scope of the consultation exercise?		
	Are the consultation objectives clear (including decisions that have already been made by Cabinet and decisions that have yet to be made)?		
	Is it clear how the feedback from respondents will be used to inform future decisions?		
Initial Analysis	Does the RIS show evidence of efficient and effective consultation with stakeholders, key affected parties and relevant experts?		
	Does it show how any issues raised have been addressed or dealt with?		
	Is there some initial analysis of the possible impacts of the options?		

Open Consultation Questions	Are the questions open and do they invite discussion?		
	Is there scope for respondents to provide feedback on issues not covered by direct questions posed in the discussion document?		
Overall QA rating of document		Choose an item.	Choose an item.

Part 5: Advice on preparing the quality assurance statement for un-narrowed discussion documents

The structure of the QA statement for a discussion document to be included in the Impact Analysis Section of the Cabinet paper is outlined below. Where there is a significant deficiency (or a number of minor deficiencies) in the discussion document, the panel may assess the document as not meeting the criteria. This would be the case if the deficiencies are likely to lead to ineffective consultation and hinder development of a good quality RIS to inform Cabinet’s final decisions.

A Quality Assurance Panel from MBIE [and x Ministry if a joint panel] has reviewed the discussion document [title of document] and determined that

[it will lead to effective consultation and enable the development of future impact analysis. Therefore, a separate regulatory impact statement (RIS) is not required at this stage. A full RIS will be completed at a later stage to inform Cabinet's final decisions on this proposal.] [Note, although it is not required, the panel can choose to include additional comment on the discussion document].

[the Discussion Document does not meet, and further impact analysis is required on (XYZ) in order to enable effective consultation]