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By email

28 August 2025

GOS fees data 2025/26

Dear Ali,

At our meeting on 19 August 2025, where we reiterated our concerns about the process that has been followed, we promised to explain in more detail how we thought that a greater increase in the sight test fee was possible while still working within the financial envelope that NHS England says is non-negotiable. We also expressed our ongoing concerns at the data on which NHS England relies. As we said at our meeting in May, some intuitively did not make sense, for example, the data on vouchers and training grants.

Since the 19 August meeting, we have spent many additional hours examining the underpinning data, trends and drawing on a larger range of data sources and we believe we have now fully resolved most of the underlying data problems that NHS England have been experiencing.

We would be very happy to walk you, or members of the team, through our process, but in summary we think that modelling using the NHS England estimates of growth provides two new estimates for the potential spend relative to the envelope of circa £17.6m.

The crux of this modelling is the longstanding relationship between sight test growth and growth in vouchers. As we have said repeatedly, the rate of growth between the two is intrinsically linked and follows a long-standing trend. This trend is essential to accurately modelling growth and spend.

After carefully recalculating the average voucher value against a larger data set, revalidating the link between sight tests and vouchers, taking on board NHS England's

concerns around the number of training grants, and correcting the way that the domiciliary fees are apportioned, we now have a near complete model.

In summary we believe that the modelling provides the following options.

	High Growth Scenario increase in sight test volume of 1.27%	Low Growth Scenario increase in sight test volume of 0.97%
Increase sight test fees to £25.00	c£9.7m over NHS England's envelope	c£8.3m over NHS England's envelope
Increase sight test fee to £24.53	c£3m over NHS England's envelope	c£1.6m over NHS England's envelope.
Increase sight test fee to £24.40	c£1.2m over NHS England's envelope	c£250k under NHS England's envelope.

We have included more detailed data in a table at Appendix 1. This is based on a sight test fee of £24.40 and your higher growth scenario of 1.27% for sight tests. The sight test to voucher ratio would be expected to be 1:0.33.

We look forward to walking you or your team through the details.

Yours sincerely

Paul Carroll
Chair OFNC

Appendix 1

	Volume	Fee		Total
GOS 1	13,690,009	£ 24.40		£ 334,036,213.26
GOS 3	4,694,141	£ 50.59		£ 237,476,617.50
GOS 4	663,493	£ 31.71		£ 21,039,353.02
GOS 5	9,121	£ 12.13		£ 110,642.45
GOS 6 high	378,397	£ 40.80	£ 24.40	£ 24,671,513.16
GOS 6 low	163,970	£ 10.21	£ 24.40	£ 5,674,996.23
CET	10,967	£ 596.00		£ 6,536,050.87
Pre-Reg	800	£ 4,010.00		£ 3,208,000.00
Other				£ 200,000.00
TOTAL				£ 632,953,386.49
Available envelope				
£ 631,800,000.00			Variance to available envelope	£ (1,153,386.49)