

Dear CDII Colleagues,

Thank you for the opportunity to review the draft fees policies and procedure. I have two comments:

1. It is unclear from the draft policy or the glossary whether Applicable Law includes any stipulations that fees be “reasonable”. I’m not sure how reasonable should be defined but it seems like fees should not be so cost prohibitive that they present a barrier to DxF participation by Participants and that the cost should not interfere with the organization’s ability to stay afloat.

2. If possible it would be great to have a sliding scale, equity-based, tiered pricing policies in the DxF policies and procedures so that smaller “scrappy” 501(c)3 nonprofit CBOs (such as those providing medically tailored meals or housing navigation services) with a budget under a certain threshold (e.g., \$500,000) do not have to pay a fee at all or only a nominal fee (\$50/year), while larger organizations, like hospitals, pay more based on the size of their annual budgets. I think an equity-focused approach here is key because those organizations best able to reach marginalized populations are also those least likely to have money or infrastructure and more likely to need to rely on a third party to exchange data.

Thanks,

Rachel