

Sample Employer, Inc. | Sample PBM, Inc.

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DSI DESIGNATION

DSI BRONZE

DATA SOVEREIGNTY

Depth of employer control across the five dimensions that decide who controls the data.

The Data Sovereignty score measures contract strength on five high-leverage provisions: rebate transparency, data ownership, audit rights, conflict of interest, and lowest net cost. Designation requires two independent conditions. Every one of the five provisions must clear a 60-point floor. And the Fiduciary Alignment Score must clear the tier threshold to achieve Bronze, Silver, or Gold status. Either condition's failure produces an INELIGIBLE result.

DESIGNATION CRITERIA

CONDITION 1: PER-PROVISION FLOOR

PASSED

All five DSI provisions must score 60 or above.

All five provisions clear the 60-point floor.

CONDITION 2: FIDUCIARY ALIGNMENT SCORE

BELOW SILVER

DSI Gold requires FAS at or above 90. DSI Silver requires FAS at or above 75.

FAS ACTUAL **61** /100 **FAIR**

Result: FAS of 61 is below the Silver threshold of 75. Even with all five floors cleared, the contract would qualify only for DSI Bronze at this FAS.

DSI PROVISION FLOORS

<p>P3 Rebate & Manufacturer Revenue</p> <p>62 PASS</p> <p>0 FLOOR 60 100</p>	<p>P4 Data Ownership & Rights</p> <p>64 PASS</p> <p>0 FLOOR 60 100</p>	<p>P5 Audit Rights & Verification</p> <p>60 PASS</p> <p>0 FLOOR 60 100</p>	<p>P6 Conflict of Interest & Neutrality</p> <p>80 PASS</p> <p>0 FLOOR 60 100</p>	<p>P8 Lowest Net Cost & Clinical Integrity</p> <p>60 PASS</p> <p>0 FLOOR 60 100</p>
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WHY DSI BRONZE

All five DSI provisions clear the 60-point floor. The Fiduciary Alignment Score of 61 is below the Silver threshold of 75. The contract meets the legal compliance floor on all five DSI dimensions, equivalent to building code compliance.

About this report. This report is provided for informational and educational purposes only. It does not constitute legal, financial, or professional advice. Scores reflect explicit contract language. They do not evaluate business practices, marketing claims, regulatory filings, or operational performance outside the documents reviewed. Plan sponsors should consult qualified counsel before incorporating any model language into a binding agreement.

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01

How DSI designations work

Four tiers. Two conditions. Both must be met.

DSI uses four designation tiers, with two independent qualifying conditions. Neither condition compensates for the other: a strong overall score cannot mask a weak provision, and a perfect floor cannot lift an average score.

DESIGNATION	FAS THRESHOLD	PER-PROVISION FLOOR
DSI Gold	FAS ≥ 90 (Excellent)	All five floors ≥ 75 (Good)
DSI Silver	FAS ≥ 75 (Good)	All five floors ≥ 60 (Fair)
DSI Bronze	No FAS minimum	All five floors ≥ 60 (Fair)
Ineligible	n/a	Any one floor below 60

The two-condition design exists because data sovereignty is a structural property of a contract, not an average. A single weak provision creates a hole large enough to compromise sponsor control regardless of strength elsewhere. The per-provision floor protects against that masking effect.

02

The LEED parallel

Built on a pattern that works.

DSI is structured after the LEED certification system for buildings, a model that has reshaped construction practice over twenty-five years. Three design choices carry over.

<p>INDEPENDENT THIRD-PARTY SCORING</p> <p>LEED is awarded by the US Green Building Council, not by builders. DSI is awarded by Nautilus Health Institute, not by PBMs. Independence is the foundation of the designation's credibility.</p>	<p>MEANINGFUL TIER DIFFERENTIATION</p> <p>LEED has Certified, Silver, Gold, and Platinum. DSI has Bronze, Silver, and Gold. Both reject the binary pass-fail framing. A Silver-rated contract is genuinely different from a Bronze-rated contract.</p>	<p>DESIGNED TO EVOLVE OVER TIME</p> <p>LEED has tightened its criteria across versions as the industry has matured. DSI is built with the same expectation. What earns Gold today may be the floor for Silver in a future version.</p>
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Like LEED, DSI rewards demonstrated contract structure rather than aspirational marketing claims. The designation is earned through what the PBM has agreed to in writing, not what is said in pitch materials.

03

Using DSI in procurement

Three ways plan sponsors apply the designation.

The DSI is most valuable when it changes a decision. Three patterns emerge from plan sponsors who use it well.

1

SET A MINIMUM TIER IN RFP SCORING

Many sponsors require DSI Silver or higher as a baseline qualifier in pharmacy-benefit RFPs. This filters proposals on contract structure before evaluating pricing or operational fit. It also signals to incumbents that data sovereignty is non-negotiable.

2

MEASURE TIER PROGRESS YEAR OVER YEAR

A DSI Bronze contract is not a failure. It is a starting point with a visible improvement path. Sponsors who re-score at each renewal create documented progress: Bronze to Silver, Silver to Gold. The designation becomes a fiduciary record, not just a moment-in-time snapshot.

3

TRANSLATE THE DESIGNATION FOR THE BOARD

The board does not need to understand the per-provision floor mechanics to engage with the designation. A short summary works: this contract meets (or does not meet) DSI Silver criteria, which means the plan sponsor can (or cannot) demonstrate that data sovereignty protections exist in writing across all five dimensions.

This DSI report places **Sample Employer, Inc.**'s Sample PBM, Inc. contract at the **DSI Bronze** level. Whether that becomes a target to maintain, a baseline to improve, or a reason to renegotiate is the sponsor's decision to make.

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