



Frequently Asked Questions

- 1. Is my practice data secure?** Yes, your data is extremely secure. The Vestrum Health IT team has broad experience working with the IRS, U.S. Treasury, and Department of Defense and industry-standard security procedures are utilized to maintain data security. Additionally, your data is de-identified prior to transfer to Vestrum.
- 2. To whom does Vestrum sell the data?** Vestrum Health's primary customers are the pharmaceutical industry, medical device manufacturers, and the financial services industry (hedge funds, analysts, etc.). Vestrum will not sell any data to payers or government entities.
- 3. How are physicians de-identified?** Data that is sold to industry does not include physician or practice names. Some blurred demographic information is provided to clients in order to increase its utility and value. However, the demographic information is limited in specificity. Data provided for clinical research does not include any physician identifiers or demographics.
- 4. How are patients de-identified?** Patient identifiers are removed and replaced with an alphanumeric identifier using an industry-standard one-way hash algorithm. No one can reverse the algorithm to generate patient identifiers – not even Vestrum Health.
- 5. Do all physicians in the practice have to participate?** No. Vestrum Health encourages full and unrestricted participation to maximize the value of the dataset, but each individual physician in a practice can choose to participate or not. In addition, physicians who choose to participate may elect to restrict authorized use of their collected data for only specific usages.
- 6. Can a physician or practice sell their data to industry directly?** No. OIG regulations preclude physicians from selling their data directly to industry as it could be viewed as an inducement. It also precludes physicians from selling their data through entities in which they have ownership.

7. Can our practice participate in other data initiatives if we participate in Vestrum? Yes. Your relationship to Vestrum is not exclusive. You may participate in the AAO's IRIS registry or other commercial data initiatives. However, participation in other commercial data initiatives may lead to decreased revenue and therefore decreased physician royalties.

8. Can I terminate participation? Yes. Physicians may terminate their participation at any time.

9. Does it cost anything to participate? No. There are no activation, interface, or maintenance fees.