

# Honest Broker Guidance

(with permission adapted from <https://www.hrpo.pitt.edu/honest-broker-guidance>)

This page provides information about how to become a certified honest broker and how the investigator obtains permission to use a certified honest broker system.

- An honest broker is a neutral third party who is not part of the research team in any way. The honest broker cannot be one of the study's investigators, study coordinators, or statisticians and cannot serve as a co-author on any publication.
- Honest Broker Systems are set up for divisions, departments, clinics, labs, etc. Multiple honest broker systems exist throughout VCU and VCUHS.
  - Wright Center Honest Broker Services; please contact [informatics.vcu.edu](mailto:informatics.vcu.edu) or Tamas Gal, Ph.D., director, at (804) 628-2123, [tsgal@vcu.edu](mailto:tsgal@vcu.edu)
  - [VCU and VCUHS honest broker process](#)
- An Honest Broker is a VCU/VCUHS Team Member who conducts Data Curation for research purposes in accordance with VCU and VCUHS policy. An Honest Broker is a neutral third party who is not part of the team for a particular research study (i.e., is not one of the investigators, study coordinators, statisticians, or data analysts on a research study). An Honest Broker for a study may not be a co-author on any publication for that same study.

## How to request permission to use a certified honest broker:

- The investigator wishing to use an honest broker system should contact the honest broker system and request honest broker services for their research study. The investigator and honest broker should work together to determine if the honest broker system is able to provide the data/samples that the investigator would like.
- To initiate a request for access to Health System Data for research, a VCU or VCUHS employee, medical staff member and/or credentialed provider, or faculty member who wishes to access Health System Data for research (the "Investigator") will submit the Research Data Application found at [informatics.vcu.edu](mailto:informatics.vcu.edu).

- The Honest Broker must agree to provide services and sign the Honest Broker Attestation form, and the Honest Broker Assurance can be found at [informatics.vcu.edu](http://informatics.vcu.edu).
- The investigator **then** submits to the VCUHS Privacy Board and the IRB and provides the signed Honest Broker Attestation form in their RAMS IRB submission to the IRB.
- An honest broker must be approved and listed on a certified honest broker system before that system can be referenced and the broker named.
- The IRB submission must also be approved before the honest broker can begin providing services to the investigator.
- [Data Use Agreement for Use of Limited Data Set](#)

If you have any questions, email [complianceservices@vcuhealth.org](mailto:complianceservices@vcuhealth.org).

## How to become a certified honest broker:

- The VCU and VCUHS honest broker process is listed here: [vcu-vcuhs.policymedical.net/policymed](http://vcu-vcuhs.policymedical.net/policymed). The honest broker application must be completed, signed, and submitted to the IRB for both the IRB and VCUHS Privacy Officer to review and approve. Refer to the application form and Research Honest Broker VCU Health System Authority and Affiliates Policy.
- Only team members with VCUHS Privacy Office credentials may function as Honest Brokers. To obtain and maintain credentialing, a team member must:
  1. be appointed by VCUHS or a VCU department to serve as an Honest Broker,
  2. attend all required training sessions, and
  3. execute the Honest Broker Attestation.
- All Honest Brokers must complete CITI Research Ethics and HIPAA training before accessing the data. The required training is listed in the VCUHS Research Honest Broker policy.
- Any listed honest broker (on an honest broker system for VCU records/data) who is not a VCU or VCUHS Employee must document how they are a part of the VCU or VCUHS workforce and have a VCU or VCUHS employee as a supervisor.
- Failure to comply with this policy and procedure may result in suspension of the Honest Broker's access to health system data and disciplinary action.

## How to access VCU Health System policies

All clinical research team members conducting research involving VCU Health System must familiarize themselves with VCU Health System policies and procedures related to clinical research and abide by them throughout the clinical study.

1. VCU Health System policies and procedures may be accessed via [VCU Health System intranet](#) (VCU Health System credentials are required for access). [Learn how to request access.](#)
2. Login to the [VCU Health System intranet policies and procedures](#)
3. Click on “Policy Manager” to review VCU Health System policies

## Links to the VCUHS Honest Broker Certification Process documents

- VCU/VCUHS Honest Broker attestation [can be found on the VCU Health System Intranet](#)
- Research data application (for VCU and VCUHS investigators) [can be found on the VCU Health System Intranet](#)

## VCU Health System Authority and Affiliates Related policies and procedures

- [HRPP Policies and guidance](#)
- [SACHRP Honest Broker](#)
- [VCU Health System Authority and Affiliates Policy Research Honest Broker](#)
- [Meeting Book - Audit, Integrity and Compliance Committee – Open Session](#)