Honest Broker Training
Standard Operating Procedures

1. Revision, Review and Approval History

Action	Name	Date	Notes
Initial Draft	Evan French	1/15/2025	
Discussion	Evan French	2/25/2025	Discussed at Research Data Provisioning meeting
Approval	Evan French	3/4/2025	Approved after 7-day comment period

2. Purpose

This document describes the training requirements for honest brokers

3. Reference Policies

The most recent version of Health System policies are available in the VCUHS Policy Library (**only accessible from the VCUHS network**).

Title	Organization	Policy Number
Research Honest Broker Policy	VCU Health System Authority and Affiliates	No number, search name
Protected Health Information, Uses & Disclosures for Research Policy	VCU Health System Authority and Affiliates	COMP-014
De-Identification of Protected Health Information Policy	VCU Health System Authority and Affiliates	MR.PH.004
Protected Health Information, Minimum Necessary Uses and Disclosures Policy	VCU Health System Authority and Affiliates	No number, search name
Uses and disclosures of PHI for which an authorization or opportunity to agree or object	Department of Health and Human Services	45 CFR 164.512(i)

is not required		
Other Requirements Relating to Uses and Disclosures of Protected Health Information	Department of Health and Human Services	[45 CFR 164.514(b)](#)
VCU/VCUHS Enterprise Data Warehouse for Research	VCU	[HM20023298](#)

4. Policy

All honest brokers are required to complete a set of training material/sessions.

All training must be renewed at specified intervals and documentation of completion provided to the VCUHS Compliance Office for honest brokers to maintain active status.

Wright Center honest broker data analysts must complete additional Epic training prior to being granted access to the Enterprise Data Warehouse.

5. Definitions

Please see definitions relevant to this policy in the [glossary](#).

6. Procedures

Initial Training

The following training material/sessions must be completed and documentation of completion provided to the VCUHS Compliance Office (complianceservices@vcuhealth.org) prior to personnel being approved to function as an Honest broker.

[VCU Talent](#)
- Information Security Awareness
    - NOTE: This training requires VCU academic login credentials

[VCUHS Workday](#)
- Information Security
- Annual Patient Privacy Training

[CITI](#)
- Basic/Refresher Course Human Subjects Research - Biomedical
- Information Privacy Security (IPS) - Health Privacy (HIPAA)

- Information Privacy Security (IPS) - Information Security

Compliance Office
- Personal Honest broker onboarding session

Supplemental Data Analyst Training

Honest broker data analysts may also receive access to the Snowflake Enterprise Data Warehouse and the Clarity/Caboodle databases on SQL Server. The prerequisites for access to each data source are listed below.

Snowflake VCU_RESEARCH_DB (MDAS, OMOP)
- Completion of *Initial Training* described above

Snowflake DATALAKE_PROD_DB and SQL Server (Clarity, Caboodle)
- Completion of *Initial Training* described above
- Completion of Cogito Fundamentals (COG170) certification/accreditation

New honest broker data analysts should enroll in the next available Clarity Data Model (CLR110) and Caboodle Data Model (CDW110) courses after completing COG170.

Ongoing Training

In order to maintain their status, honest brokers must renew the following trainings at the specified intervals.

- VCU Talent - annual
- VCUHS Workday - annual
- CITI - every two years
- Honest broker training sessions led by the VCUHS Compliance Office (quarterly)