

Recruitment Studies

Standard Operating Procedures

Revision, Review and Approval History

Action	Name	Date	Notes
Initial Draft	Evan French	2/6/2025	

Purpose

This document describes the role of Honest Brokers in projects in which the study team requires identifiable patient contact information for screening and recruitment.

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 is not required	Department of Health and Human Services	45 CFR 164.512(i)
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

Policy

Prospective studies are encouraged to consent and get HIPAA authorizations signed by their participants, with approved partial HIPAA waiver for screening/recruitment purposes. Prior to receiving identifiable data for screening and recruiting subjects, investigators must obtain approval for their project from the IRB.

Honest brokers may provide investigators with identifiable patient contact information for screening and recruitment purposes. Data provided in recruitment extracts should be the minimum necessary to carry out the recruitment process.

Subjects may be recruited in the course of routine clinical care (i.e. during a clinical encounter) without the involvement of an honest broker.

Study teams are encouraged to utilize the [Epic Best Practice Advisory \(BPA\) Recruitment Tool](#) for prospective recruitment.

Definitions

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

Procedures

Investigators leading studies requiring identifiable patient contact information for screening and recruitment should follow the process described in the [Informatics Request Process SOP](#) to secure honest broker support for their project as early as possible.

Data Release

Patient lists with identifiable contact information for screening and recruitment purposes must have an approved data transfer method in their DMS plan, typically REDCap Send-It. These patient lists are not required to be managed in the Horizon Black environment as that would make it cumbersome for the study teams to contact patients.