**Honest Broker Guidance**

 When the research team is partnering with a HIPAA covered entity, and when the research protocol necessitates the collection of research data, an honest broker is the staff member of the covered entity authorized and willing to share with the research team the research data. They ensure confidentiality of data for HIPAA and institutional policy compliance.

An honest broker must have access to the data as part of their regular work responsibilities. Their role is to create and share a de-identified data set or a limited data set as described in the approved IRB application, *though they are NOT a member of the research team*. The honest broker works within their institution/department to obtain and provide clinical/medical records, data and specimens.

Suggested Methods:

The honest broker can assign individual codes replacing PHI from the dataset thus removing any link connecting the information to the patient’s identity. The researcher can then request additional clinical information from the honest broker using the codes.

For the data to be consider de-identified or eligible for consideration as a limited data set, the honest broker should not share information about how to de-code the data.

An honest broker must be identified and have completed the “Independent Honest Broker Assurance Agreement” for submission to the GVSU IRB for initial application for approval.

Reference:

1. <https://www.hrpo.pitt.edu/honest-broker-guidance>

2. <https://irb.research.chop.edu/honest-broker>