AI Scribe Evaluation Checklist for Behavioral Health

This checklist is for behavioral health agencies and practices choosing an AI scribe, a tool that records or transcribes sessions and drafts documentation. With the following checks in place, an AI scribe can be used in a safe and ethical way.

Agreement and data

- [ ] Sign a business associate agreement that covers the product, the features you will use and every site that will use it.
- [ ] Confirm where audio, transcripts and drafts are stored, how long each is kept and how to delete them.
- [ ] Confirm whether session data is used to train models, and turn that use off.
- [ ] Confirm that subcontractors are bound by the same terms, that the vendor reports breaches and security incidents, and that data is returned or destroyed when the contract ends.
- [ ] Add the scribe to your HIPAA security risk analysis, and if your agency runs a program covered by 42 CFR Part 2, confirm that the scribe meets Part 2 for its records.

Consent

- [ ] Write a consent process that meets your state's law and your clinicians' ethics codes, and get written consent before any session is recorded.
- [ ] Offer every client the choice to decline recording without any effect on their services.

Accuracy and risk

- [ ] Test the scribe with fictional sessions that include a suicide risk assessment and a safety plan, and compare each draft with the script.
- [ ] Check drafts for anything omitted, added or changed in meaning, and test the languages, accents and interpreters your clients use.

Clinical use

- [ ] Require clinicians to review, edit and sign every note, correcting anything the scribe got wrong.
- [ ] Train staff on the scribe, the consent process and what to do when the scribe fails.
- [ ] Review a sample of notes on a schedule, and give staff and clients a way to report concerns.
- [ ] Follow your agency's crisis protocol whenever a situation involves risk.

This checklist follows HHS guidance on business associates, risk analysis and 42 CFR Part 2, and professional ethics guidance on AI, as they read on November 23, 2026.