ChatGPT HIPAA Checklist for Therapists

This checklist is for therapists who use ChatGPT without a business associate agreement (BAA) with OpenAI, which includes everyone on a personal ChatGPT plan. With the following safeguards in place, using ChatGPT for session planning, skill practice and drafting can be done in a safe and ethical way.

- [ ] **Before entering client material, remove these 18 identifiers for the client and for the client's relatives, employers and household members:**
  - Names
  - Street addresses, cities, counties, ZIP codes and other places smaller than a state
  - All parts of dates except the year, such as birth or admission dates, and ages over 89, with any year that shows such an age
  - Phone numbers
  - Fax numbers
  - Email addresses
  - Social Security numbers
  - Medical record numbers
  - Health plan beneficiary numbers
  - Account numbers
  - Certificate and license numbers
  - Vehicle identifiers and license plates
  - Device identifiers and serial numbers
  - Web addresses (URLs)
  - IP addresses
  - Fingerprints, voiceprints and other biometrics
  - Full-face photos and comparable images
  - Any other unique number, characteristic or code
- [ ] Leave out any other detail that you know could identify the client, and call the client Client A.
- [ ] Turn off “Improve the model for everyone” under Settings, then Data controls.
- [ ] Use a “temporary chat” for clinical work. Temporary chats stay out of chat history and model training, create no memories and may be kept for up to 30 days for safety.
- [ ] Skip the thumbs-up and thumbs-down buttons in clinical chats, since feedback can let the whole conversation be used for training.
- [ ] Tell clients when and why AI is used in their care, following your profession's ethics code and your work setting's consent policy.
- [ ] Make every clinical decision yourself, and review every AI draft before it enters a record or reaches a client.
- [ ] Follow your work setting's crisis protocol whenever a situation involves risk.

This checklist follows OpenAI's help pages and HHS guidance on de-identification as they read on November 22, 2026.