Copilot HIPAA Checklist for Therapists

This checklist is for therapists who use Microsoft Copilot without a business associate agreement (BAA) with Microsoft, which includes everyone signed in with a personal Microsoft account. With the following safeguards in place, using Copilot 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 “Saved memories” under Settings, then Personalization. To clear what Copilot has already saved, select Manage, then “Delete all memories.”
- [ ] Turn off “One shared experience” in the same menu, and turn off “Allow ads personalization” if Copilot shows you ads.
- [ ] Delete each clinical chat from your chat history when you finish.
- [ ] 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 Microsoft's help pages and HHS guidance on de-identification as they read on November 23, 2026.