De-identification Checklist for Therapists

This checklist is for therapists who enter client material into an AI system without a business associate agreement (BAA) with their practice. With the following safeguards in place, using AI 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

- [ ] Read the whole passage, including free text, quotes and file names, and remove every identifier wherever it appears.
- [ ] Leave out any other detail that you know could identify the client, such as a rare job or an event in the news.
- [ ] Call the client Client A, and leave out initials and parts of numbers.
- [ ] Keep the original record in your practice's own system, and enter only the de-identified version.
- [ ] If identifying information is entered by mistake, note what was entered, delete the conversation and tell your privacy officer right away.
- [ ] 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 HHS guidance on de-identification and breach notification as it read on November 23, 2026.