Gemini HIPAA Checklist for Therapists

This checklist is for therapists who use Gemini without a business associate agreement (BAA) with Google, which includes everyone signed in with a personal Google account. With the following safeguards in place, using Gemini 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.
- [ ] With a personal account, turn off “Chat content including text & uploads” under Settings, then History.
- [ ] With a personal account, use a “temporary chat” for clinical work. Temporary chats stay out of your recent chats and out of model training, and Google keeps them for around two months.
- [ ] Skip the “Good response” and “Bad response” buttons in clinical chats. Trained reviewers read feedback with its conversation, and Google keeps both for up to 3 years.
- [ ] 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 Google's help pages and HHS guidance on de-identification as they read on November 23, 2026.