

ChatGPT plan and PHI review matrix

Healthcare privacy, security and procurement teams

[Read the complete guide on aona.ai](#)

OpenAI's 9 July 2026 guide permits ChatGPT Enterprise or Edu PHI use only when the BAA expressly identifies the service as eligible; it excludes Free, Plus, Pro and Business. Healthcare and Regulated Workspaces have a separate guide. Check the applicable workspace agreement and feature conditions before sending patient information.

Published plan and feature conditions from OpenAI's guide posted 9 July 2026, checked on 21 September 2026. A separate feature checklist is included in the pack.

Vendor positions are documented and scope-specific. The customer review context and practice prompt are synthetic; no customer agreement or deployment is approved.

Your review

Reviewer: _____ Date: _____

Organisation or team: _____

☐ Match plan and workspace scope

Identify whether the July Enterprise/Edu guide or separate Healthcare/Regulated guidance applies.

☐ Confirm explicit BAA eligibility

Check the actual named service, permitted purpose and contractual conditions.

☐ Review feature and field restrictions

Validate the current guide, enabled settings, retention, recipients and sharing for the intended input.

Checked items record your review, not a compliance approval or an installed-product test result.

Notes and next actions

Decision and scope: _____

Evidence to collect: _____

Owner and next review date: _____

Review matrix

Plan or control	Published position	Customer verification
ChatGPT Enterprise	Eligible only if expressly identified in the BAA, under the July guide's scope.	Match the executed BAA and applicable workspace/feature guide.
ChatGPT Edu	The same explicit BAA eligibility condition applies in the July guide.	Do not infer PHI permission from education branding alone.

Plan or control	Published position	Customer verification
ChatGPT Free, Plus or Pro	Not Eligible Services in the July guide.	Keep PHI out of this consumer-plan route.
ChatGPT Business	Not an Eligible Service in the July guide.	A paid business plan does not establish BAA coverage.
Healthcare or Enterprise/Edu Regulated Workspace	Explicitly outside the July guide; separate workspace guidance applies.	Review that current scope and agreement, not the ordinary Enterprise/Edu feature list.
Enterprise/Edu PHI-prohibited fields	Filenames, profile/workspace details, specified GPT Content and support requests.	Keep these fields free of PHI and apply the exact category definitions.
Enterprise/Edu retention	Content remains for the agreement term unless deleted earlier or a shorter period is selected.	Set the appropriate retention and perform required removal under the applicable guide.
Search, external execution and connected recipients	The July guide restricts specified PHI uses and recommends disabling relevant third-party transmission features.	Review exact feature settings, recipients and sharing permissions before enabling them.

The purchasing decision has three parts

- **Plan:** Identify the eligible service and workspace scope
- **Agreement:** BAA expressly covers the proposed service
- **Feature:** Check fields, retention, recipients and enabled controls

Feature checklist within the July guide scope

July 2026 guide area	Documented condition	Scope check
PHI-prohibited fields	No PHI in filenames, user profile, workspace name/image, GPT Content or support requests.	See Enterprise/Edu section 4 for exact subfields.
Unsupported features	Codex, Memories and Search Agent mode are listed as unsupported for PHI.	Applies to this July guide; Healthcare and Regulated Workspace are excluded from its scope.
Search and Deep Research	The described browsing capabilities may not be used with PHI.	Confirm the applicable current workspace guide.
Canvas code network access	The described external network requests may not be used with PHI.	Review the exact enabled feature and recipient path.
Apps/connectors, Code on macOS and third-party GPTs	The guide describes potential third-party transfers and recommends disabling relevant functionality.	If enabling a permitted feature, review actual recipients and conditions.
Sharing	Customer must evaluate permissions and ensure relevant recipients are authorised.	Do not infer that all workspace members may access every shared PHI item.

Safe practice prompt

Invented scenario: improve a generic reception reminder without adding a patient name, diagnosis, booking date or identifier. No actual patient record or installed-product test result is represented.

Obtain the customer's applicable BAA and current workspace/feature guidance before approving a real use.

Sources and scope

PHI means protected health information. BAA means business associate agreement.

Sources checked 2026-09-21. Review the current requirements and your actual agreement before using this workbook for a real decision. General information, not professional approval or a completed control test. Aona does not approve HIPAA disclosures, supply an OpenAI BAA or certify a workflow as compliant. Its own handling and contractual role need review.

[HHS: Guidance on HIPAA and cloud computing](#). Business-associate roles, BAAs, risk analysis and cloud-service safeguards, including providers without decryption keys.

[OpenAI: HIPAA Implementation and Configuration Guide, 9 July 2026](#). Dated Enterprise/Edu BAA eligibility, excluded consumer/Business plans, PHI-prohibited fields, retention and feature conditions; explicitly excludes Healthcare and Regulated Workspace scope.

[OpenAI: HIPAA configuration guide for Codex](#). Separate Codex Local conditions for the specified Healthcare, Clinicians or Regulated workspace/API paths and an explicit Codex cloud exclusion; not a replacement for every ChatGPT workspace guide.

Additional source and scope notes

Official source: <https://cdn.openai.com/osa/hipaa-guide.pdf>

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Retrieved: 21 September 2026

SHA-256: fa9aa775e352c29c277a250ba80938025be206af060e4dee824e6b7a8f966607

This guide explicitly excludes ChatGPT for Healthcare and Enterprise/Edu Regulated Workspaces. The separate Codex guide has a different stated scope: <https://learn.chatgpt.com/docs/hipaa-configuration>