FOR TAX PREPARERS AND CPA FIRMS

WISP Starter

A short fill-in worksheet that helps you document the basics of a written information security program. It is organized around the FTC Safeguards Rule, 16 CFR Part 314, but it is not the full plan.

> **This is not legal, tax, or insurance advice.** Completing this worksheet does not mean the firm meets the Safeguards Rule, IRS expectations, state law, or any insurer request. ProvenPolicies helps you document a program. It does not sell, solicit, or negotiate insurance, fill out insurer applications, or give coverage advice. Have an advisor review anything you rely on.

Use this to get the basics on paper: who is in charge, what customer information you handle, the main risks, and the safeguards you already use. Write what is actually true today. If something is not in place yet, say so.

When you want the complete fill-in template, with every section of the plan ready to complete, sign up free at provenpolicies.com. The full template also covers testing, service-provider reviews, incident response, leadership updates, and FTC notice, and it notes where the Rule has a limited exception for firms that maintain customer information on fewer than 5,000 consumers.

1. Firm information

LEGAL NAME OF THE FIRM

PRIMARY OFFICE ADDRESS

NUMBER OF STAFF WHO CAN ACCESS CUSTOMER INFORMATION

APPROXIMATE NUMBER OF CONSUMERS WHOSE INFORMATION YOU MAINTAIN

TAX SOFTWARE, PORTALS, AND OTHER SYSTEMS THAT HOLD CUSTOMER INFORMATION

2. Qualified Individual

The Safeguards Rule asks a firm to designate a Qualified Individual to oversee the program. That person can work for the firm, an affiliate, or a service provider. If the role sits outside the firm, name a senior person inside the firm who oversees them.

QUALIFIED INDIVIDUAL NAME AND TITLE

EMPLOYED BY THE FIRM, AN AFFILIATE, OR A PROVIDER?

SENIOR PERSON INSIDE THE FIRM, IF THE QI IS OUTSIDE

BACKUP PERSON IF THE QI IS UNAVAILABLE

3. Customer information you handle

Examples in a tax practice can include Social Security numbers, ITINs, dates of birth, bank details, prior-year returns, and ID documents. Do not copy actual client data into this worksheet.

TYPE OF INFORMATION	WHERE IT LIVES	WHO CAN ACCESS IT	HOW LONG YOU KEEP IT

4. Main risks you see

List reasonably foreseeable internal and external risks to customer information, such as phishing, lost laptops, vendor incidents, or staff mistakes, and where your current safeguards may fall short.

RISKS AND GAPS YOU WANT THE PROGRAM TO ADDRESS

5. Safeguards in place today

Describe what is actually in place. The full template walks through these in more detail, including access controls, encryption, MFA, applications, retention, change management, and monitoring.

WHO CAN ACCESS CUSTOMER INFORMATION, AND HOW ACCESS IS REMOVED WHEN SOMEONE LEAVES

WHERE MFA IS REQUIRED TODAY, AND ANY EXCEPTIONS

HOW LAPTOPS, EMAIL, AND BACKUPS ARE PROTECTED

HOW OFTEN YOU TEST BACKUPS OR OTHER KEY SAFEGUARDS

WHO RECEIVES TRAINING, AND HOW OFTEN

VENDORS THAT HANDLE CUSTOMER INFORMATION, AND HOW YOU REVIEW THEM

HOW YOU DISPOSE OF PAPER AND ELECTRONIC CUSTOMER INFORMATION WHEN YOU NO LONGER NEED IT

6. If something goes wrong

A short record of who acts first. The full template has a complete incident-response section, plus a place to document who would handle any required notices.

WHO IS TOLD FIRST, AND WHO CAN MAKE DECISIONS

HOW STAFF REPORT A SUSPECTED INCIDENT

FIRST STEPS YOU WOULD TAKE, AND WHO YOU WOULD CONTACT FOR HELP

7. Review

DATE OF THIS WORKSHEET

NEXT DATE YOU WILL REVIEW IT

WHO COMPLETED THIS WORKSHEET, AND THEIR TITLE

What you get in the full template

Sign up free at provenpolicies.com to get the complete fill-in Written Information Security Plan template. It includes:

- Every program section, ready to complete in your own words.
- A fuller risk-assessment worksheet and data inventory.
- Detailed prompts for testing, service providers, incident response, leadership updates, and FTC notice.
- An approval log and an attachments checklist.
- Notes on where 16 CFR 314.6 has a limited exception for smaller firms.

This Starter helps you document the basics. Sign up free at provenpolicies.com to get the full template and keep working on your plan. ProvenPolicies does not sell insurance or give legal advice, and the full template does not mean the plan meets the Rule.

It is organized around the FTC Safeguards Rule, 16 CFR Part 314, as read on November 22, 2026. The Rule can change. Official text is on eCFR at 16 CFR Part 314. The IRS also reminds tax professionals to maintain a Written Information Security Plan. This worksheet is not legal, tax, or insurance advice. Completing it does not mean a firm meets any law or insurer request. ProvenPolicies helps you document a program. It does not sell, solicit, or negotiate insurance. © 2026 ProvenPolicies · provenpolicies.com