Before You Check the Box

Twelve questions for a tax or accounting firm. Ten minutes with a pen.

Your PTIN renewal asks you to acknowledge that paid preparers must keep a written information security plan. The requirement comes from the FTC's Safeguards Rule and applies all year. Answer each question for the office you run today.

		Yes	No	Not sure
Your plan				
1	Is one named person in charge of security at the firm?	☐	☐	☐
2	Do you have a written security plan, and was it reviewed in the last 12 months?	☐	☐	☐
3	Does the plan name the software, devices and people you have today, with nothing left over from a template?	☐	☐	☐
Signing in and email				
4	Does everyone use a second sign-in step, such as a code from a phone, for email, tax software and the client portal?	☐	☐	☐
5	Do you know whether someone could send email that looks like it came from your firm? Check in one minute at obsidianridge.io/email-check.	☐	☐	☐
6	When a "new client" emails an attachment before you have spoken, does staff know to send them to the portal?	☐	☐	☐
Computers and files				
7	Are the laptops that hold client files encrypted, so a stolen one can't be read?	☐	☐	☐
8	Is anyone watching your computers and sign-ins for unusual activity, including at night?	☐	☐	☐
People and vendors				
9	Does every seasonal or temporary worker have a written date when their access ends?	☐	☐	☐
10	Do you have a list of the outside companies that hold your client data, and have you read what each says about protecting it?	☐	☐	☐
11	Does your plan say which AI tools staff may use, and what client information stays out of them?	☐	☐	☐
If something goes wrong				
12	If client data were stolen tonight, do you know your first calls?	☐	☐	☐

Cyber insurance breach line _____

IRS Stakeholder Liaison for your area _____

State tax agency _____

If 500 or more people are affected, the FTC must be notified within 30 days of discovery.

Reading your answers: every "No" or "Not sure" is something your written plan should either fix or name as open.

This checklist is general information. It is not legal advice, and a page of "Yes" answers does not mean a firm meets the rule or can't be breached.

Free starting points: IRS Publication 5708 and IRS Publication 4557, at irs.gov.

Want to talk through your answers? Free 30-minute review for tax and accounting firms.

obsidianridge.io/briefing?source=byctb-pdf-m1

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