

WISPWOLF · COMPLIANCE STARTER KIT

GLBA Compliance Checklist

This is a free starter resource from WISPWOLF to help tax preparers and small firms identify their compliance gaps. It is **not** a completed Written Information Security Program. For a customized WISP, compliance score, remediation tracking, and evidence organization, generate yours at **wispwolf.com**.

How GLBA applies to your firm

The Gramm-Leach-Bliley Act treats paid tax preparers, CPA firms, bookkeepers, and many financial professionals as **financial institutions**. The FTC Safeguards Rule (16 CFR Part 314) implements the security requirements; the Privacy Rule (Part 313) implements the notice requirements.

Safeguards Rule checklist

- Designate a Qualified Individual
- Written risk assessment with documented likelihood + impact
- Implement safeguards mapped to identified risks
- Test the safeguards (continuous monitoring or annual pen test)
- Employee training and awareness program
- Vendor due diligence, contracts, and reassessment
- Written incident response plan, tested annually
- Annual board / governing-body reporting by the Qualified Individual

Privacy Rule checklist

- Provide an initial privacy notice to every customer
- Provide an annual privacy notice (or qualify for the exception)
- Honor the customer's opt-out for non-affiliate sharing
- Document the categories of nonpublic personal information collected
- Document the categories of third parties data is shared with

Recordkeeping checklist

- Maintain risk assessments and updates for at least 6 years
- Retain training records and attestations
- Retain vendor due-diligence and reassessment records
- Retain incident response test results and after-action reports

Next step

This checklist helps you self-identify gaps. Generate a customized WISP, track remediation, and produce an audit-ready evidence packet at wispwolf.com.

Next step

Generate a customized WISP, get a compliance score, and track remediation evidence at **wispwolf.com/quiz**. Want a complete Written Information Security Program instead of a starter template? Generate your WISP with WISPWolf.

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