Crafting Your Path to an Ironclad Security Program

Stephen Reyes February 21, 2024





Featured Presenter

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The Association of Accountants and Financial Professionals in Business



About Bellator Cyber Guard

Bellator Cyber Guard specializes in providing cybersecurity and WISP compliance solutions tailored for tax professionals, ensuring their practices meet stringent data protection standards. Our focused support makes regulatory compliance effortless and secure.

Agenda

- 1. Introduction
- 2. What is a WISP?
- 3. Why do I need a WISP?
- 4. WISP Elements
- 5. WISP Attachments
- 6. Conclusion
- 7. Key Takeaway

- 1. Welcome & overview of cybersecurity relevance for tax professionals.
- Purpose and objective of completing your Written Information Security Plan.
- Importance of compliance with federal law and data security for tax professionals.
- 4. Key components that constitute a comprehensive WISP.
- 5. Essential documents and templates that support a WISP's effectiveness.
- 6. Recap of the WISP's critical role in cybersecurity for tax professionals.
- The imperative of adopting a WISP for regulatory compliance and client trust.

Poll Question 1:

Preparing taxes for clients without a WISP in place is?

- a. Legal
- b. A Misdemeanor
- c. A Felony

What is a WISP?

Written Information Security Program

- Information security program. You shall develop, implement, and maintain a comprehensive information security program that is written in one or more readily accessible parts and contains administrative, technical, and physical safeguards that are appropriate to your size and complexity, the nature and scope of your activities, and the sensitivity of any customer information at issue.
- **Objectives.** The objectives of section 501(b) of the Act, and of this part, are to:
 - Insure the security and confidentiality of customer information;
 - Protect against any anticipated threats or hazards to the security or integrity of such information; and
 - Protect against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any customer.

Poll Question 2:

What percent of small business that suffer a cyber attack go out of business within 6 months?

- a. 20%
- b. 40%
- c. 60%

Why Do I Need a WISP?

Legality

- GLBA 501 and 505
 - It is the policy of the Congress that each financial institution has an affirmative and continuing obligation to respect the privacy of its customers and to protect the security and confidentiality of those customers' nonpublic personal information.
 - Each agency or authority described in section 505 shall establish appropriate standards for the financial institutions subject to their jurisdiction relating to administrative, technical, and physical safeguards:
 - To insure the security and confidentiality of customer records and information
 - To protect against any anticipated threats or hazards to the security or integrity of such records
 - To protect against unauthorized access to or use of such records or information which could result in substantial harm or inconvenience to any customer.
- Code of Federal Regulations
 - Title 16 Chapter 1 Part 314
 - Standards for Safeguarding Customer Information

Form W-12 (Rev. October 2022) Department of the Treasury Internal Revenue Service 1 Name and PTIN (Print in ink or Type)		IRS Paid Preparer Tax Identification Number (PTIN) Application and Renewal Go to www.irs.gov/FormW12 for instructions and the latest information.			OMB No. 1545-2190
			Middle name	Last name	
		☐ Initial application	Renewal application	(Enter PTIN: P	

Poll Question 3:

What Percentage of cyber-attacks target small businesses?

- a. 23%
- b. 43%
- c. 63%

WISP Elements

Qualified Individual

- Designate a qualified individual responsible for overseeing and implementing your information security program.
- The Data Security Coordinator (DSC) should report at least annually on overall status of the program and any issues or updates related to the program.
- The Public Information Officer (PIO) is responsible for following the outlined steps in the case of a data breach.



Policies

- Responsible Officials
- PII Collection and Retention
- Change Management Process
- Personnel Accountability
- PII Disclosure
- Reportable Events
- Electronic Exchange of PII
- Network Protection
- Continuous Monitoring
- User Access Control
- Wi-Fi and Remote Access
- Connected Devices
- Information Security Training



Safeguards Program

- Design and implement a safeguards program, and regularly monitor and test it.
 - Qualified Individual
 - Access Controls
 - Network Security Controls
 - Encryption
 - Multi-Factor Authentication
 - Secure Disposal Procedures
 - Change Management Procedures
 - Continuous Monitoring or Annual Penetration Testing
 - Oversee Service Providers
 - Written Incident Response Plan
 - Qualified Individual Reporting
 - Security 6



Risk Assessment

- Identify and assess the risks to PII
- Establish and evaluate safeguards for controlling these risks
- Update when new Risks are Identified
- WISP Policies are controls based on the Risk Assessment.



Poll Question 4:

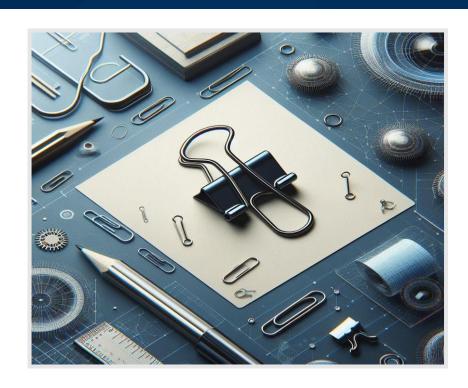
Which attack vector is most commonly used in data breaches?

- a. Social Engineering
- b. Malware
- c. Spyware

WISP Attachments

Attachments

- Data Breach Steps for PIO (IRP)
- Software to Remain Enabled
- Employee and Hardware Inventory
- Security Features
- Responsibilities
- Risk Assessment
- Additional Reportable Events



Conclusion & Key Takeaway

Questions and Answers

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Thank you!

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