

AI Section for Your WISP

Add these pages to your Written Information Security Plan. SEC-registered advisers can add the same language to their Regulation S-P policies.

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Do these three things this week

1. Fill in the blanks below and check what applies to your firm.
2. List your AI tools on Schedule A (page 3).
3. Have a partner sign page 3, then walk staff through the quick guide on page 2.

FIRM NAME

EFFECTIVE DATE

PLAN OWNER

A.1 Scope

Applies to any AI tool used for firm work, paid or free, including AI features inside software the firm licenses and tools used on a phone.

A.2 Approved tools

Only tools on Schedule A may be used for firm work. Schedule A is kept by _____ and reviewed every _____. Free or personal accounts are not allowed for firm work.

A.3 AI inside software we already license

For each program, list its AI features on Schedule A, turn off what the firm doesn't need where possible, and check whether the vendor uses client data to train its models. If a feature can't be turned off, note what client information may go into that program.

A.4 Never entered into any AI tool

Unless Schedule A says otherwise, staff never type, paste, or upload the items checked below:

- | | |
|--|---|
| ☐ Social Security and taxpayer ID numbers | ☐ Dates of birth |
| ☐ Bank, account, and card numbers | ☐ Client names with financial detail |
| ☐ Tax returns and schedules | ☐ Account and portfolio statements |
| ☐ Any file containing the above | ☐ Other: _____ |

A.5 Client information

Entering tax return information into a third-party tool may be a disclosure under IRC section 7216. For advisers, customer information in a third-party tool stays subject to Regulation S-P. Before entering client information into any tool, staff ask _____.

A.6 Incidents

Report suspected entry of client information into an unapproved tool to _____ the same day. Advisers follow the firm's Regulation S-P incident response program, including notice to affected individuals when required, as soon as practicable and no later than 30 days after becoming aware of unauthorized access to sensitive customer information.

A.7 Review

Review this section every _____ and whenever the firm adds an AI tool or a vendor changes its terms. Keep a note of each review.

Staff quick guide

Post this where your team will see it, or add it to onboarding.

1. Use only the AI tools on the firm's approved list.
2. Use your firm account, never a free or personal one.
3. Never type, paste, or upload the client information checked in A.4.
4. Not sure? Ask _____ first.
5. Made a mistake? Tell _____ the same day. Early is easier to fix.

Why A.3 matters. AI now ships inside software firms already pay for. Intuit's QuickBooks Online help says: "Currently, there isn't a way to turn off AI features individually." When you can't turn a feature off, decide in writing what goes into that program.

Written rules don't block anything on their own. Most firms pair them with a control that logs or limits what leaves the firm.



Want help putting this into practice?

Book a free 15-minute call with Brian Butterfield, CISSP, by video or phone.
micro-tech.com/txcpa · 954-327-1001



List every AI tool the firm allows, plus AI built into software you already license.

Adoption

ADOPTED BY	TITLE	DATE
SIGNATURE	NEXT REVIEW DATE	

Sources: IRS Publications 5708 and 4557. FTC Safeguards Rule, 16 CFR Part 314. IRC section 7216 and Treas. Reg. section 301.7216-3. SEC Regulation S-P, 17 CFR Part 248, as amended 89 FR 47688 (June 3, 2024). Intuit, Overview of Intuit AI in QuickBooks Online, checked October 28, 2026.