

# Remote Assessment Lessons Learned & Looking Ahead



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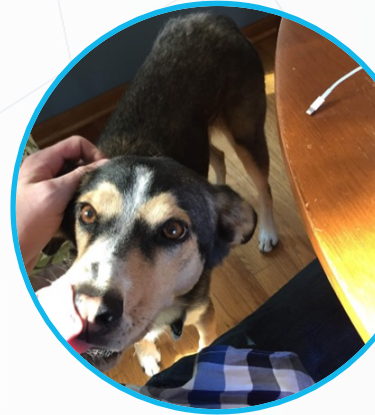
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# Historic View on Assessment



## Onsite Required

- The QSA Program Guide and PCI DSS both required onsite assessment
- Had to be 'creative' for fully hosted solutions, but made sense for merchants with many brick-and-mortar branches, multiple data centers, etc.
- In assessing Enterprise Holdings:
  - 1000's of branches in several countries
  - Plus, the travel wasn't always so bad...



# Remote Assessment - Where it all began



....and then came travel restrictions

- Enterprise's 2020 Project Timeline:
- "Just be safe and we'll adjust as necessary"
- Travel Ban / Closed Borders
  - March 11, 2020 - 8:25p CST / 3:25a in Paris
- "Get your butt in an airplane seat"
- What now?

Mar 11, 2020, 8:25 PM

Yo - Trump just announced ban on travel to/from Europe starting Friday. Need to get you home.



# Remote Assessment in 2020



## Key Considerations

### Travel Policies

- Both our business & assessment firm

### Operational impacts on location and workforce sampling

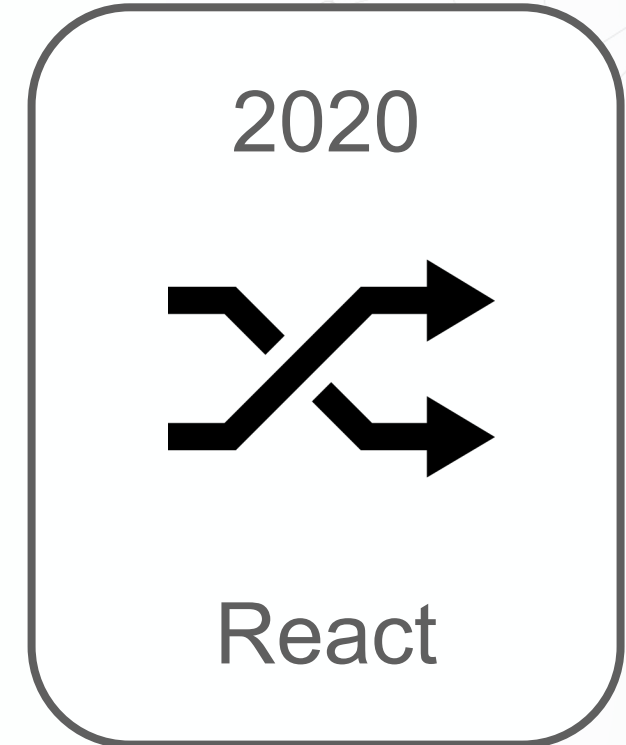
- Temporary Closures, workforce impacts

### Technical Challenges

- Physical controls testing - datacenter walkthrough

### Cultural Challenges

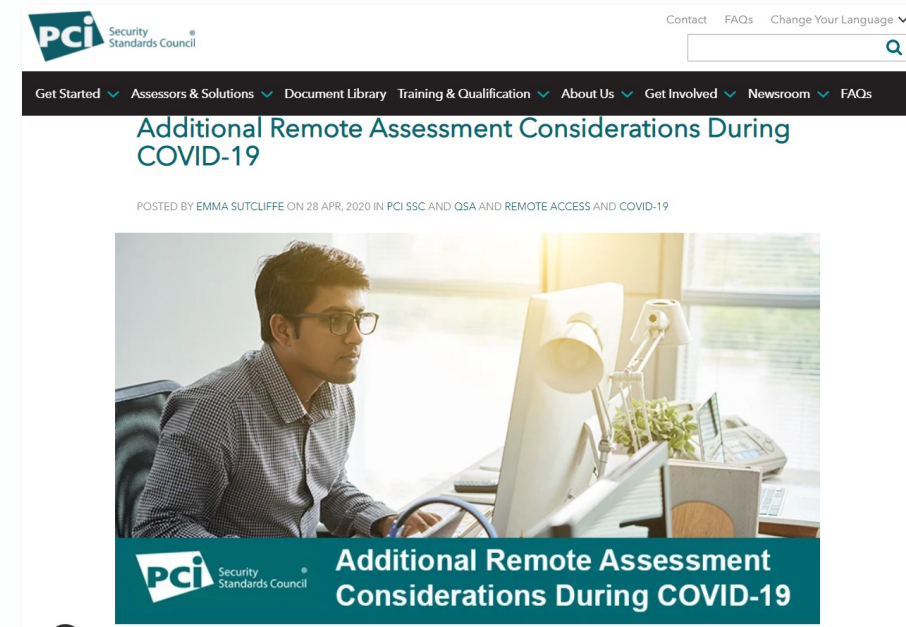
- Remote Interviews



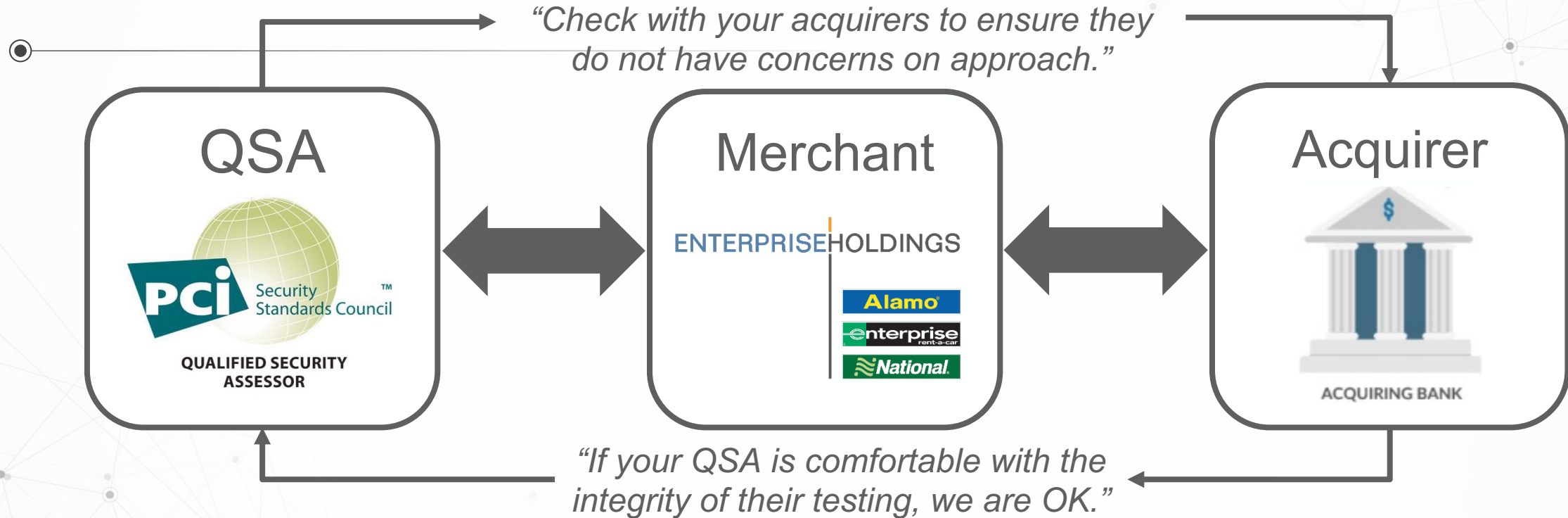
# 2020 Remote Assessment

## The lingering question – are we doing this right?

PCI Security Standards Council released guidance



# Discussion with Assessor & Acquirer



## PCI SSC Guidance (April 28th)

- “Entities should contact their compliance-accepting entity—that is, payment brand or acquirer—to determine any compliance impact associated with remote assessments.”
- “Remote assessments must be performed with the same rigor and integrity as an onsite assessment and provide an equivalent level of assurance...”

# 2021 & 2022 Remote Assessment



Business was largely stabilized

- Scoping, assessor sampling as normal

Travel still restricted

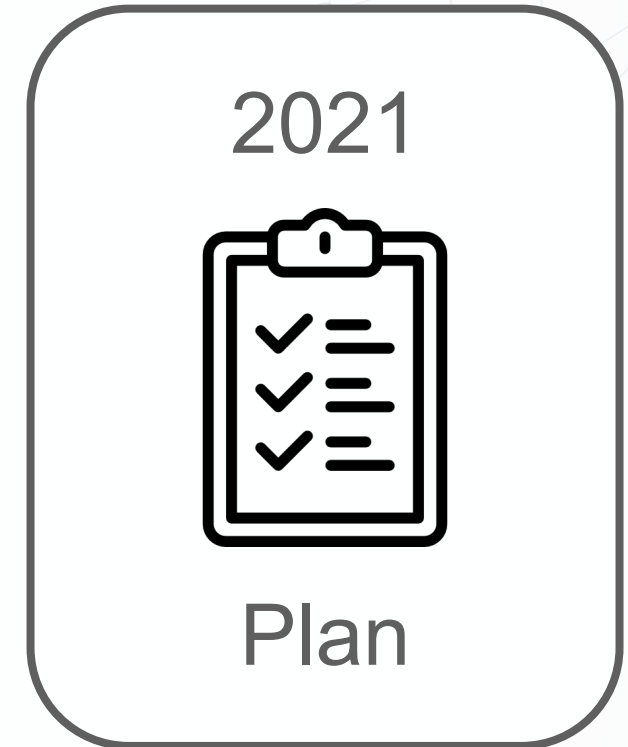
- Remote Interviews
- Remote Datacenter walkthrough
- Remote Branch Testing (new)

Shifts from 2020

- Remote work and collaboration tools new norm
  - Especially video conference

Challenges

- Patience with physical controls testing over video



# Looking Ahead...

## Remote Assessment Considerations

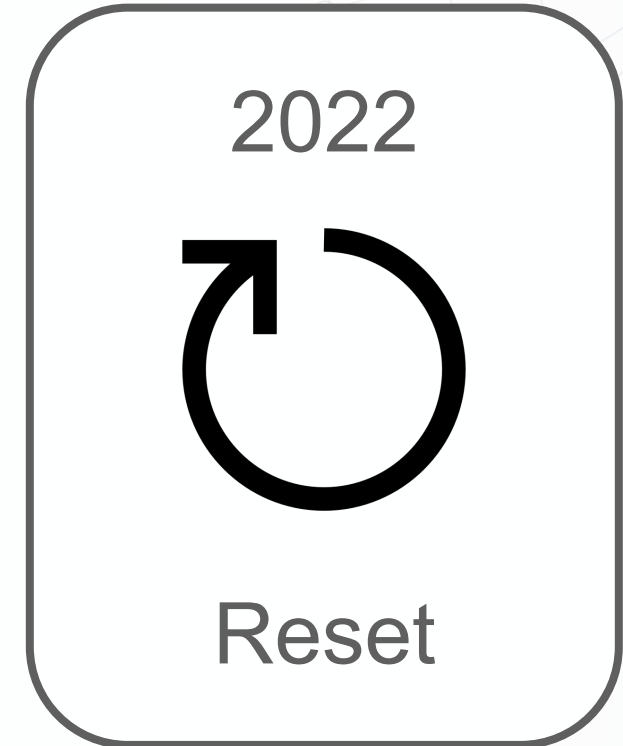


Some new norms are here to stay:

- Work from home is predominant in many areas (IT)
  - Workforce more geographically distributed
- Remote collaboration tools are default for meetings (Video/Chat)

Remote Assessment long term:

- We expect a hybrid as we consider our business factors.
- Every business is different – discuss with your QSA



# Key Takeaways



## Finding the sweet spot for remote assessments

- Pandemic was ultimately only an **accelerant** to a pending and necessary pivot
- Forced us to **define methodologies to maintaining rigor and assurance**, but now allows assessments to mirror the landscape
- Lean on the **Remote Assessment Addendum** for guidance when building your audit or project plan



### Appendix A Addendum for ROC/ROV: Remote Assessments

This Addendum documents the use of remote testing methods to complete an assessment to a PCI SSC standard. Completion of this Addendum is defined by the applicable PCI SSC program or payment brand compliance program requirements.

#### Assessment Details

PCI SSC standard and version used for the assessment:

Company name of the entity being assessed:

Name of solution, application, or product being assessed, if applicable:

Date of completion of Assessment (as stated in section 3.x of



- A combination of onsite and remote testing methods was used
- All testing was performed remotely

## Payment Card Industry (PCI) Remote Assessment

### Guidelines and Procedures

Version 1.0

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# Thank you



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