

AN ASSESSMENT IS PRESENT TENSE. A REMEDIATION PLAN IS FUTURE TENSE.

A promise can govern tomorrow's work. It cannot become evidence that today's control is implemented, operating, and ready for the result being reported.

PRACTITIONER POSITION

My practitioner position is that a PCI DSS assessment result is a bounded present-tense conclusion supported by completed implementation and evidence appropriate to the control being tested. A remediation plan is useful evidence of governance, ownership, sequencing, and intent, but it is not evidence that the planned control already exists or operates as required. The distinction becomes more-not less-important when the control has a time dimension. A current configuration can demonstrate what exists now; recurring records may be needed to demonstrate performance across the relevant period; and a future milestone can show only what the entity intends to change. PCI SSC guidance also preserves bounded cases requiring professional judgment: initial assessments of defined-frequency activities, and exceptional missed periodic activities followed by completed corrective action, successful performance, and recurrence prevention. Those cases do not turn unfinished work into an In Place result. They reinforce the discipline: identify the exact requirement, reporting context, observed state, completed corrective action, tested evidence, historical limitation, and accountable authority before selecting the assessment response.

THE FIELD PATTERN

WHAT THIS LOOKS LIKE IN PRACTICE

Three weeks before report completion, a team presents a remediation tracker for a control that is not yet fully implemented. The future design is approved, the owner is credible, the change ticket is funded, and deployment is scheduled. The assessment workbook already says In Place because everyone expects the work to finish. Evidence consists of the design, ticket, target date, and a screenshot from a development environment. No production implementation has been observed, no applicable population has been tested, and no operating evidence exists. Elsewhere, a quarterly activity was missed, later completed, and corrected with a new repeatable process-but the team has flattened that materially different case into the same green status. One status is now trying to represent a future promise, an untested implementation, a completed correction, a historical lapse, and an assessor conclusion. The calendar may be optimistic. The assessment record cannot be ambiguous about time.

SIGNALS DETECTED

WHAT SHOULD MAKE YOU STOP

- A requirement is marked In Place while the implementation ticket remains open.
- A planned go-live date appears in the evidence column as though the date were an observation.

- Development or staging evidence is substituted without proving production representativeness or current production operation.
- The control exists now, but the evidence required to demonstrate its defined-frequency operation does not exist for the relevant period.
- A current correction silently overwrites the chronology of a missed or failed occurrence.
- The words designed, approved, deployed, enabled, operating, evidenced, and assessed are treated as synonyms.
- A project manager's confidence is allowed to substitute for an assessor's completed testing.
- The report has no explicit assessment cut-off, observation date, evidence period, or post-cut-off change treatment.
- An initial-assessment provision is treated as a universal grace period for unfinished controls.
- The remediation tracker and assessment workpaper disagree about state, but neither record exposes the contradiction.

WHY IT MATTERS

THE COST OF LEAVING IT UNEXPLAINED

Start by naming the time proposition. Record the assessment period, observation date, evidence period, report cut-off, requirement instance, subject and population. 'Current' is not a date, and 'implemented' is not a complete claim until the subject, environment, configuration, owner, effective moment, and testing basis are identifiable.

Separate planned from completed. A roadmap, ticket, purchase order, design, approved exception, target date, or management commitment can demonstrate remediation governance. It cannot demonstrate that a technical or procedural control is already implemented and operating. Keep the future-state record visible, but do not let it populate the present-state result.

Separate implementation from operation. Deployment evidence may show that a control exists at a moment. It may not demonstrate that a recurring process operated across its required interval, that the applicable population was covered, or that exceptions were handled. The evidence design must follow the requirement and the claim-not the convenience of the newest screenshot.

Preserve the difference between present state and historical performance. Correcting a control can materially improve the environment now without rewriting what happened earlier. Record the failure or missed occurrence, discovery, cause, containment, completed correction, successful performance, recurrence prevention, remaining limitation, and effect on the assessment claim.

Use PCI SSC FAQ 1485 narrowly. For a first formal assessment of a requirement with a defined timeframe, the current guidance describes conditions for considering the most recent required activity and the documented process for continuing it. It also says other applicable requirements are expected to be in place at assessment time. Treat this as a specific assessment context-not a general permission to report planned work as complete.

Use PCI SSC FAQ 1572 narrowly. A compensating control cannot retroactively fill a missed periodic activity. The FAQ describes circumstances in which an assessor may consider In Place after completed corrective action, successful control performance, an exceptional circumstance, addressed cause, prevention of recurrence, and adequate assurance. The chronology and professional judgment remain visible; the later success does not manufacture the missing historical artifact.

Keep pre-production preparation in its lane. PCI SSC FAQ 1333 explains that reviewing pre-production may help an assessor understand a future environment, but a PCI DSS assessment cannot be completed and all applicable requirements cannot be reported In Place until the environment is operating and the necessary tests can be performed. A useful readiness review is still not a completed production assessment.

Create a four-state control record: proposed, implemented, demonstrated, and assessed. Proposed records carry owner, target, dependency, and acceptance criteria. Implemented records carry effective configuration and production identity. Demonstrated records carry evidence, population, period, procedure, result, and limitations. Assessed records carry the accountable response, reviewer, report lineage, and reopening triggers. Never let one state imply the next without its evidence.

Treat the reporting response as downstream. In Place, Not in Place, Not Applicable, Not Tested, and any other response permitted by the current instrument should be selected only after the requirement, facts, testing, evidence, timing, and authority are reconciled. A project status is an input to that analysis, not the assessment answer.

Close with a cut-off reconciliation. Before report completion, compare every open remediation item with its affected requirement instances and current workpapers. Record which work completed before the cut-off, which evidence was tested, which conclusions changed, which limitations remain, and which post-cut-off work belongs in the future record. The assessment documents what the evidence supports; the remediation plan documents what must happen next.

QUESTIONS

QUESTIONS THAT EXPOSE THE WACK

- 01 What exact date, period, environment, subject, and population does this assessment claim describe?
- 02 Is the cited artifact evidence of a plan, implementation, operation, test, or assessment decision?
- 03 What production evidence demonstrates the completed control rather than the intended design?
- 04 Does this requirement require a point-in-time state, performance across a period, or both?
- 05 What historical failure or missed occurrence would disappear if we showed only the corrected current state?
- 06 Is an initial-assessment provision actually applicable to this requirement and reporting history?
- 07 If a periodic activity was missed, have the FAQ 1572 conditions been evaluated and documented rather than assumed?
- 08 What work completed before the report cut-off, and what remained future state afterward?
- 09 Who owns remediation execution, who evaluates evidence, who makes the assessment judgment, and who accepts the report?

10 Can a cold reviewer distinguish proposed, implemented, demonstrated, and assessed without asking when the status changed?

THE CLUSTER OF WACK

FIND / MAP / EXPLAIN / REDUCE / PROVE

ESCAPE THE WACK

01 / FIND

Collect the requirement instance, assessment and evidence periods, report cut-off, current response, remediation records, production implementation facts, operating evidence, failures, retests, and reporting history.

02 / MAP

Join every item to four distinct states-proposed, implemented, demonstrated, and assessed-with dates, subjects, environments, populations, evidence, procedures, owners, authorities, limitations, and transitions.

03 / EXPLAIN

Write the chronology in plain language: what was absent, what was planned, what changed, when it became effective, what was observed and tested, what historical limitation remains, and what the current assessment response actually claims.

04 / REDUCE

Remove future-tense evidence from present-tense conclusions, retire ambiguous green statuses, stop substituting non-representative environments, and make each state transition require its own minimum proof.

05 / PROVE

Run a cut-off review against all open and recently closed remediation. Reperform the applicable test where needed, preserve the evidence and limitations, and demonstrate that post-cut-off promises cannot silently alter the report result.

THE LINE WORTH REMEMBERING

A REMEDIATION PLAN CAN PROVE THAT WORK IS GOVERNED. ONLY COMPLETED, TESTED EVIDENCE CAN PROVE THE STATE THE ASSESSMENT REPORTS.

Download the Assessment Cut-Off and Remediation Reconciliation Record. Separate proposed, implemented, demonstrated, and assessed before a future promise becomes a present-tense conclusion.

TECHNICAL GROUNDING

START WITH THE SOURCE MATERIAL

These references ground the practitioner interpretation. They do not turn the metaphor or method into official PCI DSS terminology.

- WACK-SOURCE-0001 / PCI DSS v4.0.1 / PCI Security Standards Council / [Open source](#)
- WACK-SOURCE-0090 / PCI SSC Releases ROC Template for PCI DSS v4.0.1 / PCI Security Standards Council / [Open source](#)
- WACK-SOURCE-0096 / FAQ 1485: What is the meaning of initial PCI DSS assessment? / PCI Security Standards Council / [Open source](#)
- WACK-SOURCE-0097 / FAQ 1333: Can PCI DSS compliance be determined by testing only pre-production environments using test data? / PCI Security Standards Council / [Open source](#)
- WACK-SOURCE-0098 / FAQ 1572: Can a compensating control be used when a periodic activity was missed? / PCI Security Standards Council / [Open source](#)

AUTHORITY CLASSIFICATION / PCI_SSC_SOURCE / ASSESSOR_JUDGMENT / PRACTITIONER_POSITION / PRACTITIONER_METHOD / AI_ASSISTED

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