

I MISSED MY ASV SCAN: THERE IS GUIDANCE, NOT A TIME MACHINE

You cannot scan last quarter today. You can recover the facts, perform the control correctly now, repair the operating process, and present an honest assessment record. That is not the same as making the missed occurrence disappear.

PRACTITIONER POSITION

A missed ASV scan is not a documentation inconvenience and it is not automatically cured by obtaining a passing scan after the required window. PCI SSC FAQ 1572 states that an activity required at a defined frequency cannot be performed retroactively or backdated, and a compensating control cannot be used merely to cover the missed timeframe. The same FAQ provides an assessment path, not automatic forgiveness: after corrective action and successful performance of the control, an assessor may determine the requirement In Place only when the evidence provides assurance of a repeatable documented process, an exceptional circumstance rather than poor or recurring practice, correction of the cause, and steps designed to prevent recurrence. Otherwise, Not in Place may be the appropriate result. FAQ 1152 separately explains the quarterly scan-remediate-rescan objective and states that an entity has not met the requirement when the absence of four passing quarterly outcomes results from poor scheduling, incomplete scans, or unresolved vulnerabilities. The QSA can assess the facts, test the corrective state, exercise bounded professional judgment, and document the result. The compliance-accepting entity controls its own validation and reporting program and may need to answer what must be submitted, when, and with what consequence. Contacting it is therefore necessary for the program decision, but it is not a substitute for using the published guidance, preserving the missed occurrence, or completing the assessment work.

THE FIELD PATTERN

WHAT THIS LOOKS LIKE IN PRACTICE

An entity discovers during readiness that no ASV scan was completed in one required three-month period. A passing scan is obtained immediately. The root cause appears to be a renewal failure and an unmonitored scanner notification sent to a departed employee. The assessor explains that the later scan cannot be backdated and says the entity may also need direction from its compliance-accepting entity. Management hears only: 'Nobody can tell us anything until the acquirer responds.' Operations starts searching for a waiver, compliance asks whether the passing rescan fixes the problem, and the evidence team removes the blank quarter from its tracker. The official guidance already answers several assessment questions. What it does not do is grant the assessor authority to promise how the acquirer or payment brand will handle the entity's compliance-program submission.

WHAT SHOULD MAKE YOU STOP

- The missed quarter is represented as a late task rather than a distinct expected occurrence with no in-window scan evidence.
- A current passing scan is renamed or described as if it satisfied the earlier period.
- The team asks for a compensating control solely because the defined-frequency activity was not performed on time.
- The cause is described as 'the reminder failed' without identifying process ownership, renewal, notification routing, population approval, escalation, and verification failures.
- The word exceptional is applied to ordinary staffing, budget, scheduling, backlog, or recurring operational weakness without evidence.
- The assessor's assessment judgment and the compliance-accepting entity's reporting or program decision are discussed as one permission.
- The entity pauses remediation while waiting for the accepting entity to answer a question that does not change the need to scan, remediate, rescan, and prevent recurrence.
- The final evidence package retains the passing scan but not the missed-occurrence record, original chronology, cause analysis, corrective action, and recurrence-prevention evidence.

WHY IT MATTERS

THE COST OF LEAVING IT UNEXPLAINED

Start with the historical fact. Name the expected scan window, the applicable environment and population, the responsible owner, the evidence that should exist, and the point at which the team discovered it did not. Do not move the due date, relabel the next scan, or create a retrospective artifact that implies in-window performance. The missed occurrence is now part of the assessment population and the vulnerability-management operating record.

Then establish the current technical state. Initiate the ASV process promptly, confirm the complete applicable population, address findings, and obtain required rescans. Preserve every scan in the sequence, including failed, disputed, incomplete, and passing results. FAQ 1152 recognizes that a collection of results may together demonstrate the quarterly scan-remediate-rescan process when coverage and remediation are complete. That nuance does not allow results from a later period to populate an empty earlier period.

Build the corrective-action case around operation, not adjectives. Identify the cause and every contributing control weakness: contract renewal, inventory handoff, scan scheduling, target approval, notification routing, owner absence, alerting, management escalation, and evidence verification. Establish a documented repeatable process, perform it successfully, and add preventive mechanisms that can detect their own failure. If the entity relies on an exceptional-circumstance explanation, preserve the evidence and allow the assessor to evaluate whether the published conditions are actually met.

Keep assessment judgment separate from program acceptance. The assessor can evaluate Requirement 11.3.2 and the applicable testing procedures, determine whether the current evidence and corrective actions

support In Place or whether Not in Place is appropriate, and document the basis in workpapers and the ROC or SAQ. The assessor should not promise a waiver, penalty outcome, filing extension, or acceptance decision that belongs to an acquirer, payment brand, or other compliance-accepting entity.

Contact the compliance-accepting entity with a complete question, not an empty confession. Identify the entity and merchant or service-provider context, validation method, missed period, current assessment status, corrected scan state, root cause, prevention, assessor treatment, expected submission date, and the exact program direction requested. FAQ 1142 points entities to the payment brands and acquirer for compliance-program questions; FAQ 1152 also notes that external scan results may be separately required by those programs. Their response should become a governed engagement input, not a substitute for the assessment record.

The agitating truth is that there is useful guidance before the acceptor responds. It tells you that the quarter cannot be recreated, that a timing-only compensating control is not the answer, that corrective performance and exceptional circumstances have bounded assessment significance, and that the result must be documented. What remains external is the compliance program's handling of the submission. 'Contact your accepting entity' is correct for that decision. It is incomplete when used to avoid explaining everything the entity and assessor can and must do now.

QUESTIONS

QUESTIONS THAT EXPOSE THE WACK

- 01 What exact three-month period was missed, and which expected ASV scan occurrence and target population does it affect?
- 02 Was an initial scan performed in the period but the remediation and passing-rescan cycle remained incomplete, or was no qualifying scan performed at all?
- 03 What original scanner, ticket, contract, notification, inventory, and owner records establish the chronology without reconstruction?
- 04 Has the complete applicable population now been scanned, remediated, and rescanned, with all results preserved?
- 05 What circumstance caused the miss, and what evidence distinguishes it from poor scheduling, recurring failure, or weak security practice?
- 06 Which documented process, accountable owner, backup, alert, escalation, and verification now prevent another silent missed occurrence?
- 07 What assessment result and report language does the assessor support, and which facts or limitations drive that judgment?
- 08 Which separate reporting, submission, due-date, or compliance-program decision must be obtained from the identified compliance-accepting entity?

THE CLUSTER OF WACK

FIND / MAP / EXPLAIN / REDUCE / PROVE

ESCAPE THE WACK

01 / FIND

Preserve the unedited chronology: expected scan window, approved population, owner, contract and account state, scheduled work, notifications, scan records, discovery date, findings, remediation, rescans, and the missing evidence itself. Determine whether the failure was no scan, incomplete coverage, or an unfinished passing cycle.

02 / MAP

Separate four decision lanes: historical occurrence, current technical correction, assessor testing and conclusion, and compliance-accepting-entity program direction. Connect each lane to its evidence, accountable role, open question, deadline, and final record.

03 / EXPLAIN

Write the missed-occurrence narrative using the published conditions. State what did not happen, why, whether the circumstance is asserted as exceptional, what cause was corrected, how recurrence is prevented, what the successful current performance proves, and what it cannot prove about the earlier period.

04 / REDUCE

Replace reminder-only scheduling with an occurrence ledger, named owner and backup, contract and credential monitoring, population reconciliation, early-window scanning, remediation capacity, due-window alerts, missed-run escalation, and independent completion verification. Do not wait for the acceptor before restoring sound operation.

05 / PROVE

Test the new process through one complete scan-remediate-rescan cycle. Verify the population against the CDE-relevant public-edge register, confirm failure alerts and escalation, inspect preserved adverse results, document the assessor's bounded conclusion, and attach the accepting entity's program direction when received.

THE FIELD LAW

THE LINE WORTH REMEMBERING

YOU CAN REPAIR THE SCAN PROCESS TODAY. YOU CANNOT PERFORM LAST QUARTER TODAY.

Download the Missed ASV Occurrence Decision Record. Reconstruct the quarter without changing it, run the complete current scan-remediate-rescan process, document cause and prevention, separate assessor judgment from accepting-entity direction, and send the acceptor a question precise enough to answer.

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-0006 / Resource Guide: Vulnerability Scans and Approved Scanning Vendors / PCI Security Standards Council / [Open source](#)
- WACK-SOURCE-0008 / FAQ 1473: Role of compliance-accepting entities and assessors in determining applicability / PCI Security Standards Council / [Open source](#)
- WACK-SOURCE-0010 / FAQ 1142: How to contact the payment card brands / PCI Security Standards Council / [Open source](#)
- WACK-SOURCE-0031 / FAQ 1572: Periodic controls cannot be completed retroactively / PCI Security Standards Council / [Open source](#)
- WACK-SOURCE-0062 / FAQ 1152: Requirement to complete four passing quarterly ASV scans / PCI Security Standards Council / [Open source](#)

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

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