

# Payment Card Industry (PCI) PIN Security Requirements

# **Template for Report on Compliance**

For use with PCI PIN Security Requirements v3.0

**Revision 1.0a** 

March 2019



# **Document Changes**

Date	Version	Description
January 2019	1.0	To introduce the template for submitting Reports on Compliance. This document is intended for use with version 3.0 of the PCI PIN Security Requirements.
March 2019	1.0a	Minor errata



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# Introduction to the ROC Template

This document, the Payment Card Industry PIN Security Requirements (PCI PIN Standard) Template for Report on Compliance for use with PCI PIN Security Requirements and Test Procedures v3.0, Revision 1.0 ("ROC Reporting Template"), is the mandatory template for Qualified PIN Assessors (QPAs) completing a Report on Compliance (ROC) for assessments against the PCI PIN Security Requirements and Test Procedures, v3.0. The ROC Reporting Template provides reporting instructions and the template for QPAs to use. This can help provide reasonable assurance that a consistent level of reporting is present among assessors.

#### Use of this Reporting Template is mandatory for all v3.0 submissions.

Tables have been included in this template to facilitate the reporting process for certain lists and other information as appropriate. The tables in this template may be modified to increase/decrease the number of rows, or to change column width. Additional appendices may be added if the assessor feels there is relevant information to be included that is not addressed in the current format. However, the assessor must not remove any details from the tables provided in this document. Personalization, such as the addition of company logos, is acceptable.

# Do not delete any content from any place in this document, including this section and the versioning above. These instructions are important for the assessor as the report is written and for the recipient in understanding the context the responses and conclusions are made. Addition of text or sections is applicable within reason, as noted above

The Report on Compliance (ROC) is produced during onsite PCI PIN assessments as part of an entity's validation process. The ROC provides details about the entity's environment and assessment methodology, and documents the entity's compliance status for each PCI PIN Requirement. A PCI PIN compliance assessment involves thorough testing and assessment activities, from which the assessor will generate detailed work papers. These work papers contain comprehensive records of the assessment activities, including observations, results of system testing, configuration data, file lists, interview notes, documentation excerpts, references, screenshots, and other evidence collected during the course of the assessment. The ROC is effectively a *summary of evidence* derived from the assessor's work papers to describe how the assessor performed the validation activities and how the resultant findings were reached. At a high level, the ROC provides a comprehensive *summary of testing activities performed and information collected* during the assessment against the *PCI PIN Security Requirements and Test Procedures, v3.2.1*. The information contained in a ROC must provide enough detail and coverage to verify that the assessed entity is compliant with all PCI PIN requirements.



# **ROC Sections**

The ROC includes the following sections and appendices:

- Section 1: Contact Information and Report Date
- Section 2: High-level Network Diagrams
- Section 3: Description of Scope of Work and Approach Taken
- Section 4: Details about Reviewed Environment
- Section 5: Findings and Observations
- Appendices 1 and 2: Compensating Controls and Compensating Controls Worksheet (as applicable)

The first four sections must be thoroughly and accurately completed, in order for the assessment findings in Section 5 and any applicable responses in the Appendices to have the proper context. The Reporting Template includes tables with Reporting Instructions built-in to help assessors provide all required information throughout the document. Responses should be specific, but efficient. Details provided should focus on concise quality of detail, rather than lengthy, repeated verbiage. Parroting the testing procedure within a description is discouraged, as it does not add any level of assurance to the narrative. Use of template language for summaries and descriptions is discouraged and details should be specifically relevant to the assessed entity.

# **ROC Summary of Assessor Findings**

With the Reporting Template, an effort was made to efficiently use space, and as such, there is one response column for results/evidence ("ROC Reporting Details: Assessor's Response") instead of three. Additionally, the results for "Summary of Assessor Findings" represent the testing and results that took place, which should be aligned with the Attestation of Compliance (AOC).

There are five results possible: In Place, In Place with CCW (Compensating Control Worksheet), Not Applicable, Not Tested, and Not in Place. At each sub-requirement there is a place to designate the result ("Summary of Assessor Findings"), which can be checked as appropriate. See the example format on page 5, as referenced.

The following table is a helpful representation when considering which selection to make. Remember, only one response should be selected at the sub-requirement level, and reporting of that should be consistent with other required documents, such as the AOC.



RESPONSE	WHEN TO USE THIS RESPONSE:	USING THE SAMPLE BELOW:		
requirement have been met as stated. "i		In the sample, the Summary of Assessment Findings at 1.1 is "in place" if all report findings are in place for 1.1.a and 1.1.b or a combination of in place and not applicable.		
In Place w/ CCW (Compensating Control Worksheet)	The expected testing has been performed, and the requirement has been met with the assistance of a compensating control. All responses in this column require completion of a Compensating Control Worksheet (CCW). Information on the use of compensating controls and guidance on how to complete the worksheet is provided in the PCI PIN.	In the sample, the Summary of Assessment Findings at 1.1 is "in place with CCW" if all report findings are in place for 1.1.a and 1.1.b with the use of a CCW for one or both (completed at the end of the report) or a combination of in place with CCW and not applicable.		
the process of being implemented, or require further testing before it will		In the sample, the Summary of Assessment Findings at 1.1 is "not in place" if either 1.1.a or 1.1.b are concluded to be "not in place."		
N/A (Not Applicable)	The requirement does not apply to the organization's environment. All "not applicable" responses require reporting on testing performed to confirm the "not applicable" status. Note that a "Not Applicable" response still requires a detailed description explaining how it was determined that the requirement does not apply.	In the sample, the Summary of Assessment Findings at 1.1 is "not applicable" if both 1.1.a and 1.1.b are concluded to be "not applicable." A requirement is applicable if any aspects of the requirement apply to the environment being assessed, and a "Not Applicable" designation in the Summary of Assessment Findings should not be used in this scenario. <b>Note:</b> Future-dated requirements are considered Not		
		Applicable until the future date has passed. While it is true that the requirement is likely not tested (hence the original instructions), it is not required to be tested until the future date has passed, and the requirement is therefore not applicable until that date. As such, a "Not Applicable" response to future- dated requirements is accurate, whereas a "Not Tested" response would imply there was not any consideration as to whether it could apply (and be perceived as a partial or incomplete ROC).		
		Once the future date has passed, responses to those requirements should be consistent with instructions for all requirements.		
Not Tested	The requirement (or any single aspect of the requirement) was not included for consideration in the assessment and was not tested in any way. (See "What is the difference between 'Not Applicable' and 'Not Tested'?" in the following section for examples of when this option should be used.)	In the sample, the Summary of Assessment Findings at 1.1 is "not tested" if either 1.1.a or 1.1.b are concluded to be "not tested."		



#### What is the difference between "Not Applicable" and "Not Tested?"

Requirements that are deemed to be not applicable to an environment must be verified as such. Using the example of Store and Forward, an organization that does not acquire PCI payment-brand denominated, PIN-based POS transactions in any capacity, an assessor could select "N/A" for Requirement 4-1 after confirming via testing that there are no PCI payment-brand denominated, PIN-based POS transactions. The accompanying reporting must reflect the testing performed to confirm the Not Applicable status.

If a requirement is completely excluded from review without any consideration as to whether it could apply, the "Not Tested" option should be selected. Examples of situations where this could occur may include:

- An organization may be asked by its acquirer to validate a subset of requirements—for example: requirements to which an entity was previously found non-complaint.
- A service provider organization might offer a service that covers only a limited number of PCI PIN requirements—for example, an entity
  that acquires transactions but also operates a key-injection facility (KIF) on behalf of others may only wish to validate the Annex B KIF
  security requirements.

In these scenarios, the organization only wishes to validate certain PCI PIN requirements even though other requirements might also apply to its environment. Compliance is determined by the brands and acquirers, and the AOCs they see will be clear in what was tested and not tested. They will decide whether to accept a ROC with something "not tested," and the QPA should speak with them if any exception like this is planned. This should not change current practice, just reporting.

### **Sample Findings and Observations Template**

**Note:** Checkboxes have been added to the "Summary of Assessment Findings" so that the assessor may double click to check the applicable summary result. Hover over the box you'd like to mark and click once to mark with an 'x'. To remove a mark, hover over the box and click again.

Control Objective 1 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)				
and Test Procedures	Assessor's Response		In Place with CCW	Not Applicable	Not Tested	Not in Place
Requirement 1: Sample requirement						
1.1 Sample sub-requirement						
1.1.a Sample testing procedure	<report findings="" here=""></report>	1	1	1		
1.1.b Sample testing procedure	<report findings="" here=""></report>					



# **ROC Reporting Details**

The reporting instructions in the Reporting Template explain the intent of the response required. There is no need to repeat the testing procedure or the reporting instruction within each assessor response. As noted earlier, responses should be specific and relevant to the assessed entity. Details provided should focus on concise quality of detail, rather than lengthy, repeated verbiage and should avoid parroting of the testing procedure without additional detail or generic template language.

Assessor responses will generally fall into categories such as the following:

One word (yes/no)

Example Reporting Instruction: Indicate whether the assessed entity is an issuer or supports issuing services. (yes/no)

Document name or interviewee job title/reference – In Sections 4.3, "Documentation Reviewed," and 4.4, "Individuals Interviewed" below, there is a space for a reference number and *it is the QPA's choice* to use the document name/interviewee job title or the reference number at the individual reporting instruction response.

Example Reporting Instruction: Identify the individuals interviewed who confirm that ...

 Sample description – For sampling, the QPA must describe the sample selection and its basis in Section 5, "Findings and Observations." If sampling is not used, the types of components that were tested must still be identified. This may be accomplished by listing the tested items individually in the response.

Example Reporting Instruction: Identify the sample of removable media observed.

Brief description/short answer – Short and to the point, but provide detail and individual content that is not simply an echoing of the testing procedure or reporting instruction nor a template answer used from report to report, but instead relevant and specific to the assessed entity. These responses must include unique details, such as the specific system configurations reviewed (to include what the assessor observed in the configurations) and specific processes observed (to include a summary of what was witnessed and how that verified the criteria of the testing procedure). It is not enough to simply state that it was verified. Responses must go beyond that and include details regarding *how* a requirement is in place.

Example Reporting Instruction: **Describe** the procedures for secure key distribution that were observed to be implemented.

Example Reporting Instruction: For the interview, summarize the relevant details discussed that verify ...

### Dependence on another service provider's compliance:

Generally, when reporting on a requirement where a third-party service provider is responsible for the tasks, an acceptable response for an "in place" finding may be something like:

Assessor verified this is the responsibility of Service Provider X, as verified through review of x/y contract (document). Assessor reviewed the AOC for Service Provider X, dated MM/DD/YYYY, and confirmed the service provider was found to be PCI PIN



compliant **against PCI PIN Standard v3.0** for all applicable requirements, and that it covers the scope of the services used by the assessed entity.

That response could vary, but what's important is that it is noted as "in place" and that there has been a level of testing by the assessor to support the conclusion that this responsibility is verified and that the responsible party has been tested against the requirement and found to be compliant.

### **Do's and Don'ts: Reporting Expectations**

DO:		DON'T:	
•	Use this Reporting Template when assessing against v3.0 of the PCI PIN Standard.	<ul> <li>Don't report items in the "In Place" column unless they have been verified as being "in place" as stated.</li> </ul>	
	Complete all sections in the order specified. Read and understand the intent of each Requirement and Testing Procedure. Provide a response for every Testing Procedure. Provide sufficient detail and information to support the designated finding, but be concise. Describe <i>how</i> a Requirement is in place per the Reporting Instruction, not just that it <i>was</i> verified. Ensure the parts of the Testing Procedure and Reporting Instruction are addressed. Ensure the response covers all applicable system components. Perform an internal quality assurance review of the ROC for clarity, accuracy, and quality.	<ul> <li>Don't include forward-looking statements or project plans in the "In Place" assessor response.</li> <li>Don't simply repeat or echo the Testing Procedure in the response.</li> <li>Don't copy responses from one Testing Procedure to another.</li> <li>Don't copy responses from previous assessments.</li> <li>Don't include information irrelevant to the assessment.</li> <li>Don't leave any spaces blank. If a section does not apply, annotate it as such.</li> </ul>	
•	Provide useful, meaningful diagrams, as directed.		



# **ROC Template for PCI PIN v3.0**

This template is to be used for creating a Report on Compliance. Content and format for a ROC is defined as follows:

# 1. Contact Information and Report Date

#### 1.1 Contact information

Client				
Company name:				
Company address:				
Company URL:				
Company contact name:				
<ul> <li>Contact phone number:</li> </ul>	Contact e-mail address:			
Assessor Company				
<ul> <li>Company name:</li> </ul>				
Company address:				
<ul> <li>Company website:</li> </ul>				
Assessor				
Lead Assessor name:				
<ul> <li>Assessor PCI credentials: (QPA)</li> </ul>				
<ul> <li>Assessor phone number:</li> </ul>	<ul> <li>Assessor e-mail address:</li> </ul>			
<ul> <li>List all other assessors involved in the</li> </ul>	e assessment. If there were none, mark as Not Applicable. (add rows as	s needed)		
Assessor name:	Assessor PCI credentials: (QPA)			
Assessor Quality Assurance (QA) Pr	imary Reviewer for this specific report (not the general QA contact	t for the QPA)		
• QA reviewer name:				
• QA reviewer phone number:				
<ul> <li>QA reviewer e-mail address:</li> </ul>				



#### **1.2** Date and timeframe of assessment

Date of report:	
Timeframe of assessment (start date to completion date):	
Identify date(s) spent onsite at the entity:	
Describe the time spent onsite at the entity, time spent performing remote assessment activities and time spent on validation of remediation activities.	

#### 1.3 PCI PIN version

-	Version of the PCI PIN Standard used for the assessment
	(should be 3.0)):

#### 1.4 Additional services provided by QPA Company

The PCI SSC Qualification Requirements for Qualified PIN Assessors (QPA) v1.0 includes content on "Independence," which specifies requirements for assessor disclosure of services and/or offerings that could reasonably be viewed to affect independence of assessment. Complete the below after review of relevant portions of the Qualification Requirements document(s) to ensure responses are consistent with documented obligations.

•	Disclose all services offered to the assessed entity by the QPAC, including but not limited to whether the assessed entity uses any security-related devices or security-related applications that have been developed or manufactured by the QPAC, or to which the QPAC owns the rights or that the QPAC has configured or manages:	
•	Describe efforts made to ensure no conflict of interest resulted from the above mentioned services provided by the QPAC:	



#### 1.5 Summary of Findings

PCI PIN Requirement	Summary of Findings (check one)			
	Compliant	Non-Compliant	Not Applicable	Not Tested
Control Objective 1:				
Control Objective 2:				
Control Objective 3:				
Control Objective 4:				
Control Objective 5:				
Control Objective 6:				
Control Objective 7:				
Annex A1 – Control Objective 3:				
Annex A1 – Control Objective 4:				
Annex A1 – Control Objective 5:				
Annex A1 – Control Objective 6:				
Annex A2 – Control Objective 3				
Annex A2 – Control Objective 4:				
Annex A2 – Control Objective 5:				
Annex A2 – Control Objective 6:				
Annex A2 – Control Objective 7:				
Annex B – Control Objective 1:				
Annex B – Control Objective 2:				
Annex B – Control Objective 3:				
Annex B – Control Objective 4:				
Annex B – Control Objective 5:				
Annex B – Control Objective 6:				
Annex B – Control Objective 7:				



# 2. High-level network diagram(s)

For entities engaged in the processing of PIN based transaction provide a network schematic describing PIN based transaction flows with the associated key type usage. Additionally, KIFs and entities engaged in remote key distribution using asymmetric techniques should provide keying material flows

- Critical components including POS/ATM devices, systems, and HSMs, as applicable
- Other necessary payment components, as applicable





# 3. Description of Scope of Work and Approach Taken

Part 3a. Scope Verification				
Services that were INCLUDED in the scope of the PCI PIN Assessment (check all that apply):				
Туре с	f service(s) assessed:			
	PIN Acquirer Payment Processing - POS			
	PIN Acquirer Payment Processing - ATM			
	Remote Key Distribution Using Asymmetric Keys - Operations			
	Certification and Registration Authority Operations			
	Key Injection Facilities			
	Others (specify)			
<b>Note</b> : These categories are provided for assistance only,and are not intended to limit or predetermine an entity's service description. If you feel these categories don't apply to your service, complete "Others." If you're unsure whether a category could apply to your service, consult with the applicable payment brand.				
	ces that are provided by the service provider but were NOT INCLUDED in the scope of the PCI PIN Assessment ( all that apply):			
Туре о	of service(s) <b>not</b> assessed:			
	PIN Acquirer Payment Processing - POS			
	PIN Acquirer Payment Processing - ATM			
	Remote Key Distribution Using Asymmetric Keys - Operations			
	Certification and Registration Authority Operations			
	Key Injection Facilities			
	Others (specify)			
Provide a brief explanation why any checked services were not included in the assessment:				



#### Part 3b. Locations

List types of facilities (for example, data centers, key injection facilities, certification authority operations, etc.) and a summary of locations included in the PCI PIN review.

Date of Assessment	Location(s) of facility (city, country):
18-20 June, 2019	Boston, MA, USA



## 4. Details about Reviewed Environment

#### 4.1 Cryptographic keys used

#### For acquiring entities

Provide a summary listing of all cryptographic keys used in connection with the acquiring and processing of PIN data. This includes keys used by POI devices, HSMs, and those shared with other internal network nodes or other organizations that are used for the conveyance of PIN data and associated messages.

Note that MAC and account-data encryption keys are not in scope except to ensure they are not used for functions that are in scope, such as PIN encipherment.

A summary listing of these keys:

- Must include the name/usage, e.g.:
  - TMK: Terminal Master Key POI key-encipherment key;
  - PEK: POI PIN-encipherment key;
  - MFK: HSM Master File Key;
  - KEK-A: Zone key-encipherment key shared with organization A;
  - ZPK: Zone PIN Key-A PIN-encipherment key shared with organization A;
  - Etc.
- Must also include keys such as any asymmetric key pairs used for remote key-establishment and distribution as delineated in Annex A, and other keys used in the message flow such as MAC and keys associated with account-data encryption.
- Does not include vendor keys such as those used for firmware authentication, but shall include acquirer-controlled private or secret keys used to sign payment applications that handle PIN data, display prompt control data, etc.

#### Under Annexes A and B

Vendor-controlled secret and private keys used in connection with the following activities are also in scope:

- When used in connection with vendor-operated PKIs used for remote key loading using asymmetric techniques. This applies specifically to the distribution of acquirer keys to transaction-originating devices (POIs) for use in connection with PIN and account-data encryption, whether the actual distribution of acquirer keys occurs from the transaction-processing host or is distributed directly by the vendor. This includes:
  - Root and Subordinate Certification Authority keys and keys used in connection with associated Registration Authority activities
  - Device-specific key pairs used for that purpose



- Keys associated with protection of the aforementioned keys during storing, loading, and usage
- The generation of the aforementioned keys
- When used in connection with KIF activities for loading and/or distribution of acquirer keys to transaction-originating devices (POIs) for use in connection with PIN and account-data encryption.
- When used for the protection of PIN and account data when conveyed between non-integrated components of a POI device—e.g., an SCR and a PIN pad. Note: When created and/or loaded by the acquiring entity, these keys are in scope of the Transaction Processing Operations section.

Additionally, acquirer keys generated on behalf of the acquirer are in scope.

Key Name	Purpose/Usage	Algorithm	<b>Size</b> (Bits)	Generated by e.g., Acquirer, Vendor, etc.	Form Factor Loaded to Device In e.g., # Components, Encrypted, etc.	Unique per device/ Acquirer/ Vendor-specific/ Other (describe)



#### 4.2 Critical hardware used

Identify and list all types of hardware in use. Critical hardware includes HSMs, KLDs and POI devices.(ATM or POS) and Host Processing software For each item in the list, provide details for the hardware as indicated below. Add rows, as needed.

#### **Critical Hardware/Software**

Type of Device/Name of Host Software (for example, POS, ATM, HSM, KLD, proprietary, commercial product name, etc.)	Vendor	Make/Model	Role/Functionality



#### 4.3 Documentation reviewed

Identify and list all reviewed documents. Include the following:

Reference Number (optional)	<b>Document Name</b> (including version, if applicable)	Brief description of document purpose	Document date (latest version date)
Doc-1			
Doc-2			
Doc-3			
Doc-4			
Doc-5			
Doc-6			
Doc-7			
Doc-8			
Doc-9			
Doc-10			
Doc-11			
Doc-12			
Doc-13			
Doc-14			
Doc-15			



#### 4.4 Individuals interviewed

Identify and list the individuals interviewed. Include the following:

Reference Number (optional)	Employee Name	Role/Job Title	Organization
Int-1			
Int-2			
Int-3			
Int-4			
Int-5			
Int-6			
Int-7			
Int-8			
Int-9			
Int-10			
Int-11			
Int-12			
Int-13			
Int-14			
Int-15			



#### 4.5 Disclosure summary for "In Place with Compensating Control" responses

•	Identify whether there were any responses indicated as "In Place with Compensating Control." (yes/no)	

If "yes," complete the table below:

List of all requirements/testing procedures with this result	Summary of the issue (legal obligation, etc.)

#### 4.6 Disclosure summary for "Not Tested" responses

•	Identify whether there were any responses indicated as "Not Tested": (yes/no)	
•	If "yes," complete the table below:	

List of all requirements/testing procedures with this result	Summary of the issue (for example, not deemed in scope for the assessment, etc.)



# 5. Findings and Observations

# **Transaction Processing Operations**

# Control Objective 1: PINs used in transactions governed by these requirements are processed using equipment and methodologies that ensure they are kept secure

	Control Objective 1 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
Requirement 1:	All cardholder-entered PINs must be processed in equipmen (SCDs). PINs must never appear in the clear outside of an S		ements fo	r secure o	cryptogra	phic devi	ces		
	nic device (SCD) must meet the requirements of a "Physically Sec red against one of the following:	ure Device" as defined in ISO	13491.7	This is evi	idenced l	by their b	eing		
<ul> <li>One of the version or</li> <li>FIPS 140-2 level</li> </ul>	ons of the PCI PTS standard, as members of Approval Classes EPP, I 3 or higher	PED, or UPT (collectively know	n as POI	Devices)	and Appr	oval Class	s HSMs,		
use of approved devic	g PIN-based transactions is responsible for maintaining information s es. For each individual device, the minimal information elements are i 30, PCI PIN Requirement 33, and PCI DSS Requirement 9.9.1):								
The company name (w	rendor) of the device model								
The device model	Iname								
<ul> <li>The PCI PTS App</li> </ul>									
The POI device inform	nation must include the following summary information								
<ul> <li>List of models use</li> </ul>	ed								
	evices, broken down by model.								
approval for each su	of applications that replace or disable the PCI evaluated firmware func inch implementation unless those applications are validated for complia sted as such in the approval listings.								
1-1 Testing Procedure	es applicable to POI devices (PCI PTS standards):								
1-1.a Obtain the POI of	levice information. Check for the correct population of the fields	<report findings="" here=""></report>							



Control Objective 1 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>1-1.b</b> Compare the information against the list of approved PTS devices at www.pcisecuritystandards.org to determine which POI devices used are PCI approved and are listed, with a valid PCI approval number on the PCI SSC website.	<report findings="" here=""></report>							
<b>1-1.c</b> For devices identified as PCI approved, verify that all of the following POI device characteristics match the PCI PTS listing.	<report findings="" here=""></report>							
Vendor name								
Model name/number								
Hardware version number								
Firmware version number								
<ul> <li>Name and application version number of any applications resident within the device that were included in the PTS assessment</li> </ul>								
<b>1-1.d</b> For a sample of the PCI-approved devices, verify that the device displays the firmware version and either displays or has a label with the hardware version number.	<report findings="" here=""></report>							
<b>Note:</b> PCI-approved devices must show the same version numbers of hardware and firmware as have been approved and are shown in the list of approved devices. If it is not displayed, the hardware number must be shown on a label attached to the device. The firmware and application version numbers, and optionally the hardware version number, must be shown on the display or printed during startup or on request. This includes all modules addressed in testing, including SRED and Open Protocols.								
For unattended devices, the focal point is the PIN-entry vehicle.								
1-2 Not used in Transaction Process Operations procedures.								
1-3 All hardware security modules (HSMs) shall be either:								
FIPS140-2 Level 3 or higher certified, or								
PCI approved.								



Control Objective 1 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>1-3.a</b> For all HSM brands/models used, examine approval documentation (e.g., FIPS certification or PTS approval) and examine the list of approved devices to verify that all HSMs are either:	<report findings="" here=""></report>							
<ul> <li>Listed on the NIST Cryptographic Module Validation Program (CMVP) list, with a valid listing number, and approved to FIPS 140-2 Level 3, or higher. Refer http://csrc.nist.gov.</li> </ul>								
<ul> <li>Listed on the PCI SSC website, with a valid SSC listing number, as Approved PCI PTS Devices under the approval class "HSM." Refer to https://www.pcisecuritystandards.org.</li> </ul>								
<b>1-3.b</b> Examine documented procedures and interview personnel to verify that all PIN- translation operations are performed only by the FIPS-approved and/or PTS-approved HSMs identified above.	<report findings="" here=""></report>							
1-4 The approval listing must match the deployed devices in the following characteristics:	1							
Vendor name								
Model name and number								
Hardware version number								
Firmware version number								
<ul> <li>The PCI PTS HSM or FIPS 140 approval number</li> </ul>								
<ul> <li>For PCI-approved HSMs, any applications resident within the device, including applicati included in the PTS assessment.</li> </ul>	on version number, that were							



Control Objective 1 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>1-4.a</b> For all PCI-approved HSMs used, examine HSM devices and examine the <i>PCI SSC List of Approved PCI PTS Devices</i> to verify that all of the following device characteristics match the PCI PTS listing for each HSM:	<report findings="" here=""></report>							
Vendor name								
Model name/number								
Hardware version number								
Firmware version number								
The PCI PTS HSM number								
<ul> <li>Any applications, including application version number, resident within the device which were included in the PTS assessment</li> </ul>								
<b>1-4.b</b> For all FIPS-approved HSMs used, examine HSM devices and examine the <i>NIST Cryptographic Module Validation Program</i> (CMVP) list to verify that all of the following device characteristics match the FIPS140-2 Level 3 (or higher) approval listing for each HSM:	<report findings="" here=""></report>							
Vendor name								
Model name/number								
Hardware version number								
Firmware version number								
The FIPS 140 approval number								

- a. All cardholder PINs processed online must be encrypted and decrypted using an approved cryptographic technique that provides a level of security compliant with international and industry standards. Any cryptographic technique implemented meets or exceeds the cryptographic strength of TDEA using double-length keys.
- b. All cardholder PINs processed offline using IC card technology must be protected in accordance with the requirements in Book 2 of the EMV IC Card Specifications for Payment Systems and ISO 9654.

2-1 Documented procedures exist and are followed that ensure any employee or agent neither requests a cardholder to			
divulge their PIN in an oral or written manner nor enters it for the cardholder—e.g., documented procedures state that the			
merchant, clerk, and/or teller will not request or accept the PIN from the cardholder.			



Control Objective 1 PCI PIN Security Requirements	Reporting Details:	Sum	Summary of Assessment Findings (check one)					
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>2-1.a</b> Through interview of responsible personnel, demonstration at sample points of entry, and examination of documented procedures, determine that:	<report findings="" here=""></report>							
<ul> <li>Written procedures include language prohibiting employees from requesting, observing, or entering a cardholder's PIN.</li> </ul>								
<ul> <li>Such procedures are followed at the point of PIN entry.</li> </ul>								
2-2 Online PIN translation must only occur using one of the allowed key-management methor master key/session key.	ods: DUKPT, fixed key,							
<b>2-2.a</b> Interview responsible personnel to determine key-management methods used for online PIN acquisition.	<report findings="" here=""></report>							
<b>2-2.b</b> Examine system documentation, the summary of cryptographic keys, and the network schematic (see "Overview" section) to determine key-management methods used within each zone—e.g., terminal to host, host to next node, etc. Confirm only approved methods are in use.	<report findings="" here=""></report>							



Control Objective 1 PCI PIN Security Requirements	Reporting Details:	Sum	<b>nent Finc</b> e)	nt Findings		
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>2-3</b> Online PINs must be encrypted using an algorithm and key size that is specified in <i>ISO</i> approved algorithms for online PIN are:	9564. Currently, the only					
<ul> <li>The TDEA using the electronic code book (TECB) mode of operation, and</li> </ul>						
AES as described in ISO 18033-3						
For purposes of these requirements, all references to TECB are using key options 1 or 2, as	defined in ISO 18033-3.					
<i>Note:</i> <i>Effective 1 January 2023:</i> Fixed key for TDES PIN encryption in POI devices is disallow	ed.					
Effective 1 January 2023: Fixed key for TDES PIN encryption in host-to-host connection	s is disallowed.					
Effective 1 January 2023: All hosts must support ISO PIN block format 4 decryption.						
<i>Effective 1 January 2025:</i> All hosts must support ISO PIN block format 4 encryption.						
2-3.a Interview responsible personnel to determine encryption algorithms utilized in connection with "not-on-us" acquisitions of PIN blocks.	<report findings="" here=""></report>					
<b>2-3.b</b> Examine system documentation, the list of cryptographic keys, and the network schematic to verify information provided during the aforementioned interviews:	<report findings="" here=""></report>					
• For internally developed systems, examine system design documentation or source code for type of key (algorithm) and key sizes used to encrypt the PIN blocks. Examine the point in <b>2-3.a</b> Interview responsible personnel to determine encryption algorithms utilized in connection with "not-on-us" acquisitions of PIN blocks.the code where the calls are made to the hardware security module.						
<ul> <li>For application packages, examine parameter files (e.g., the Base24 KEYF file) to determine type of key (algorithm) and key sizes used to encrypt PIN blocks.</li> </ul>						
<b>2-3.c</b> Examine the HSM configuration to ensure that the PIN translation encryption algorithms are only TDEA and/or AES.	<report findings="" here=""></report>					
<b>2-3.d</b> Examine the algorithm type parameter (to ensure it denotes TDEA and/or AES) and hardware-encryption-required parameter (if applicable, to ensure it indicates hardware encryption—not software encryption) on every terminal link, network link, and if applicable, internal path (i.e., if using an intermediate key) for the host application.	<report findings="" here=""></report>					



	PCI PIN Security Requirements		Reporting Details:	Sum		Assessment Findings heck one)			
			Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
re	<b>2-4</b> All cardholder PINs processed offline using IC card technology must be protected in accordance with the requirements in Book 2 of the <i>EMV IC Card Specifications for Payment Systems</i> and <i>ISO 9564</i> . See Book 2, Section 7, of the <i>EMV IC Card Specifications for Payment Systems</i> , and <i>ISO 9564</i> .								
	PIN submission method	PIN entry device and IC reader integrated as a device meeting the requirements of <i>ISO</i> 9564	PIN entry device and IC reader not integrated as a device meeting the requirements of <i>ISO</i> 9564						
	1. Enciphered PIN block submitted to the IC card	The PIN block shall be submitted to the IC card enciphered using an authenticated encipherment key of the IC card.	The PIN block shall be enciphered between the PIN entry device and the IC reader in accordance with <i>ISO 9564</i> or enciphered using an authenticated encipherment key of the IC card.						
			The PIN block shall be su enciphered using an auth key of the IC card.						
	2. Plaintext PIN block submitted to the IC card	No encipherment of the PIN block is required.	The PIN block shall be er entry device to the IC rea <i>ISO 9564.</i>						

**2-4.a** Interview the responsible personnel to determine which POI device models identified in Requirement 1 summary are used for offline PIN acquiring.

2-4.b Validate that the POI device models used for offline PIN-including both the ICCR	<report findings="" here=""></report>
and the PIN entry device where non-integrated—are approved for "Offline PIN" on the PTS	
Approved Devices Listing at www.pcisecuritystandards.org.	

Requirement 3:	For online interchange transactions, PINs must be only encrypted using ISO 9564–1 PIN-block formats 0, 1, 3 or 4. Format 2 must be used
	for PINs that are submitted from the IC card reader to the IC card.

3-1 For secure transmission of the PIN from the point of PIN entry to the card issuer, the encrypted PIN-block format			
must comply with ISO 9564 format 0, ISO 9564 format 1, ISO 9564 format 3, or ISO 9564 format 4.			



Control Objective 1 PCI PIN Security Requirements	Reporting Details:	Sum	Summary of Assessment Findings (check one)					
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>3-1.a</b> Interview responsible personnel to determine the PIN-block format(s) utilized for "not- on-us" traffic from point of acquisition through routing of the transaction to another entity. Examine and verify the accuracy of the network schematic.	<report findings="" here=""></report>		•					
<b>3-1.b</b> Examine system documentation to verify information provided during interviews. This is mandatory, especially if personnel have indicated the use of a compliant PIN-block format:	<report findings="" here=""></report>							
<ul> <li>For internally developed systems, examine system design documentation, transaction logs, or source code for type of PIN-block format(s) used.</li> </ul>								
<ul> <li>For application packages, examine parameter files where the PIN-block format is specified (e.g., the KEYF file for Base 24). Verify the format is ISO Formats 0, 1, 3, or 4 as the online PIN-block type for compliance.</li> </ul>								
<b>3-2</b> PINs enciphered only for transmission between the PIN entry device and the IC reader in formats specified in <i>ISO 9564</i> . Where ISO format 2 is used, a unique-key-per-transaction met <i>11568</i> shall be used. Format 2 shall only be used in connection with either offline PIN verific operations in connection with ICC environments.	ethod in accordance with ISO							
<b>3-2.a</b> Using the summary from Requirement 1, identify any non-PCI-approved devices and device types for which the ICC card reader is not integrated in the PIN entry device. For each of these device types, Interview applicable personnel to determine that PINs enciphered only for transmission between the PIN entry device and the ICCR use one of the PIN-block formats specified in <i>ISO 9564</i> . If format 2 is used, verify that a unique-key-per-transaction method in accordance with <i>ISO 11568</i> is used.	<report findings="" here=""></report>							
<b>Note:</b> PCI-approved devices are validated to this; nevertheless, personnel must still be interviewed to validate the implementation.								
<b>3-2.b</b> Examine device documentation to validate that the device functions as described above.	<report findings="" here=""></report>							



Control Objective 1 PCI PIN Security Requirements Assessor's Respons		etails:	Summary of Assessment Findi (check one)							
	and Test Procedures			Assessor's Response		In Place	In Place w/CCW	N/A	Not Tested	Not in Place
formats. PINs enciphered using format other than ISO for enciphered using ISO for format 1. ISO format 1 r Translations between P translation capability be format 3 to ISO format 3 translations from format	formats (i.e., ISO formats 0, 1, 2, 3, and 4) ISO format 0, ISO format 3, or ISO format 4 format 0, 3, or 4 except when translated to I format 1 may be translated into ISO format 2 may be translated into ISO format 2 as spe IN-block formats that both include the PAN tween ISO formats 0, 3, or 4 (including tran 3, or from ISO format 4 to ISO format 4) mu s 0, 1, 3 and 4:	4 must not be tra SO format 2 as 0, 3, or 4, but mu cified in the table I shall not support I shall not support I shall not support I shall not allow a cl	anslated in specified ir ust not be t e below. ort a change O format 0 hange of P	to any other PIN-bi o the table below. F ranslated back into e in the PAN. The l o to ISO format 0, f AN. The following i	ock PINs DISO PIN- rom ISO					
Translation					]					
To → From ↓	ISO Format 0, 3, 4	ISO Format 1	IS	O Format 2	-					
ISO Format 0, 3, 4	<ul> <li>Permitted anywhere without change of PAN</li> <li>Change of PAN only permitted in sensitive state for card issuance</li> <li>Change of PAN token to real PAN only permitted with cryptographic binding of PAN token to real PAN</li> </ul>	Not permitted	Permitte to an IC	d for submission card	-					
ISO Format 1	Permitted	Permitted	to an IC							
ISO Format 2	Not permitted	Not permitted	Permitte to an IC	d for submission card	J					



Control Objective 1 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<ul> <li>3-3.a Verify the following, using information obtained in the prior steps of Requirement 3:</li> <li>ISO PIN-block formats are not translated into non-ISO formats.</li> <li>ISO PIN-block formats 0, 3, and 4 are not translated into any PIN-block formats other than 0, 3, or 4 except for submission to an IC payment card.</li> <li>If ISO format 1 is translated to ISO format 0, 3, or 4, it is not translated back to ISO format 1.</li> <li>If ISO format 1 is translated to ISO format 2, it is only for submission to an IC payment card.</li> <li>PIN-block translations from ISO format 0, 3, or 4 to any of ISO format 0, 3, or 4 do not</li> </ul>	<report findings="" here=""></report>				1			
<ul> <li>support a change in PAN.</li> <li><b>3-3.b</b> Where translated to format 2, verify that the PIN block is only submitted to the IC card.</li> <li><i>Note:</i> For offline PIN this is verified for PCI-approved POI devices: <ul> <li>a) The PIN that is submitted by the ICC reader to the IC shall be contained in a PIN block conforming to ISO format 2 PIN block. This applies whether the PIN is submitted in plaintext or enciphered using an encipherment key of the IC.</li> <li>b) Where the ICC reader is not integrated into the PIN entry device and PINs are enciphered only for transmission between the PIN entry device and the ICC reader, the device shall use one of the PIN-block formats specified in ISO 9564-1. Where ISO format 2 PIN blocks are used, a unique-key-per-transaction method in accordance with ISO 11568 shall be used.</li> </ul> </li> </ul>	<report findings="" here=""></report>							
Requirement 4:       PINs must not be stored except as part of a store-and-forward tran logged, the encrypted PIN block must be masked or deleted from the encrypted, the encrypted PIN block must be masked or deleted from the encrypted, must not be retained in transaction journals or logs. PIN blocks are required in must not be retained for any subsequent verification of the transaction. Transaction of a single transaction (the time between PIN entry and verification, i.e. store storage of other data elements, see the PCI Data Security Standards.	he record before it is logged. 64. PIN blocks, even essages sent for nsaction PINs shall only exist	mum time		ary. If a ti		n is		



Control Objective 1 PCI PIN Security Requirements	Reporting Details:	Sum	Summary of Assessment Findings (check one)					
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>4-1</b> Interview appropriate personnel to determine whether PINs are stored or retained for some period of time as part of a store-and-forward environment:	<report findings="" here=""></report>							
• Examine transaction journals/logs to determine the presence of PIN blocks. If present, PIN blocks—whether enciphered or not—must be masked before the record is logged. For environments using online transaction monitors (e.g., CICS), specifically note how management is ensuring that PINs are not stored in online transaction journals.								
<ul> <li>For entities that drive POS devices, examine documentation (operating procedures) to verify the disposition of PIN blocks when communication links are down.</li> </ul>								



# Control Objective 2: Cryptographic keys used for PIN encryption/decryption and related key management are created using processes that ensure that it is not possible to predict any key or determine that certain keys are more probable than other keys.

Control Objective 2 PCI PIN Security Requirements	Reporting Details:	Sum		of Assessment Findings (check one)				
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
Requirement 5: All keys, key components, and key shares must be generated usi	ng an approved random or ps	eudo-rano	dom proc	ess.				
<b>5-1</b> Keys must be generated so that it is not feasible to determine that certain keys are mor from the set of all possible keys. Generation of cryptographic keys or key components must be generated by one of the following:								
<ul> <li>An approved key-generation function of a PCI-approved HSM or POI</li> </ul>								
An approved key-generation function of a FIPS 140-2 Level 3 (or higher) HSM								
<ul> <li>An SCD that has an approved random number generator that has been certified by an comply with NIST SP 800-22</li> </ul>	independent laboratory to							
<b>Note:</b> Random number generation is critical to the security and integrity of all cryptographic key generation relies upon good quality, randomly generated values.	systems. All cryptographic							
<b>5-1.a</b> Examine key-management policy documentation to verify that it requires that all devices used to generate cryptographic keys meet one of the following:	<report findings="" here=""></report>	1	1		1			
<ul> <li>An approved key-generation function of a PCI-approved HSM or POI</li> </ul>								
<ul> <li>An approved key-generation function of a FIPS 140-2 Level 3 (or higher) HSM</li> </ul>								
<ul> <li>An SCD that has an approved random number generator that has been certified by an independent qualified laboratory according to NIST SP 800-22.</li> </ul>								
<b>5-1.b</b> Examine certification letters or technical documentation to verify that all devices used to generate cryptographic keys or key components meet one of the following:	<report findings="" here=""></report>							
<ul> <li>An approved key-generation function of a PCI-approved HSM or POI</li> </ul>								

• An approved key-generation function of a FIPS 140-2 Level 3 (or higher) HSM

• An SCD that has an approved random number generator that has been certified by an independent qualified laboratory according to *NIST SP 800-22*.

5-1.c Examine procedures to be used for future generations and logs of past key	<report findings="" here=""></report>
generations to verify devices used for key generation are those as noted above, including	
validation of the firmware used.	



Control Objective 2 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)					
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>Requirement 6:</b> Compromise of the key-generation process must not be possible v	vithout collusion between at le	east two	trusted in	dividuals			
<b>6-1</b> Implement security controls, including dual control and tamper detection, to prevent the u keys or key components. Perform the following:	inauthorized disclosure of						
<b>6-1.1</b> Any clear-text output of the key-generation process must be managed under dual control. Only the assigned custodian can have direct access to the clear text of any key component/share. Each custodian's access to clear-text output is limited to the individual component(s)/share(s) assigned to that custodian, and not the entire key.							
6-1.1.a Examine documented procedures to verify the following.	<report findings="" here=""></report>						
Any key-generation process with clear-text output is performed under dual control							
<ul> <li>Any output of a clear-text component or share is overseen by only the assigned key custodian(s) for that component/share</li> </ul>							
<ul> <li>Each custodian's access to clear-text output is limited to the individual component(s)/share(s) assigned to that custodian, and not the entire key.</li> </ul>							
6-1.1.b Observe key-generation process demonstration and interview responsible personnel to verify:	<report findings="" here=""></report>						
Any key-generation process with clear-text output is performed under dual control.							
<ul> <li>Any output of a clear-text component or share is overseen by only the assigned key custodian(s) for the component/share.</li> </ul>							
<ul> <li>Each custodian's access to clear-text output is limited to the individual component(s)/share(s) assigned to that custodian, and not the entire key.</li> </ul>							
6-1.2 There must be no point in the key-generation process where a single individual has the ability to determine, obtain, or ascertain any part of a clear-text key or all the components for a key.							
<b>Note:</b> Key shares derived using a recognized secret-sharing algorithm or full-length key co considered key parts and do not provide any information regarding the actual cryptographi	•						
<b>6-1.2.a</b> Examine documented procedures for all key-generation methods and observe demonstrations of the key-generation process from end-to-end to verify there is no point in the process where a single person has the ability to determine, obtain, or ascertain any part of a clear-text key or all the components for a key.	<report findings="" here=""></report>						



Control Objective 2 PCI PIN Security Requirements and Test Procedures	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)					
		In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<ul> <li>6-1.2.b Examine key-generation logs to verify that:</li> <li>The documented procedures were followed, and At least two individuals performed the key-generation processes.</li> </ul>	<report findings="" here=""></report>						
<ul> <li>6-1.3 Devices used for generation of clear-text key components that are output in the clear must either be powered off when not in use or require re-authentication whenever key generation is invoked.</li> <li>Logically partitioned devices used concurrently for other processes—e.g., providing services simultaneously to host systems, such as for transaction processing—must have key-generation capabilities disabled when not in use and other activities are continuing.</li> </ul>							
<ul> <li>6-1.3 Examine documented procedures for all key-generation methods. Verify procedures require that:</li> <li>Key-generation devices that generate clear-text key components are powered off when not in use or require re-authentication whenever key generation is invoked; or</li> <li>If the device used for key generation is logically partitioned for concurrent use in other processes, the key-generation capabilities are enabled for execution of the procedure and disabled when the procedure is complete.</li> </ul>	<report findings="" here=""></report>						
<ul> <li>6-1.4 Key-generation equipment used for generation of clear-text key components must not show any signs of tampering (for example, unknown cables) and must be inspected prior to the initialization of key-generation activities. Ensure there isn't any mechanism that might disclose a clear-text key or key component (e.g., a tapping device) between the key-generation device and the device or medium receiving the key or key component.</li> <li>Note: This does not apply to logically partitioned devices located in data centers that are concurrently used for other purposes, such as transaction processing.</li> </ul>							
<b>6-1.4.a</b> Examine documented procedures for all key-generation methods to verify they include inspections of the key-generation equipment for evidence of tampering prior to use. Verify procedures include a validation step to ensure no unauthorized mechanism exists that might disclose a clear-text key or key component (e.g., a tapping device).	<report findings="" here=""></report>						
6-1.5 Physical security controls must be used to prevent unauthorized personnel from accessing the area during key- generation processes where clear-text keying material is in use. It must not be feasible to observe any clear-text keying material either directly or via camera monitoring.							



Control Objective 2 PCI PIN Security Requirements and Test Procedures	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)					
		In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>6-1.5.a</b> Examine documentation to verify that physical security controls (e.g., partitions or barriers) are defined to ensure the key component/ cannot be observed or accessed by unauthorized personnel.	<report findings="" here=""></report>						
<b>6-1.5.b</b> During the demonstration for 6-1.1.b, observe the physical security controls (e.g., partitions or barriers) used, and validate that they ensure the key-generation process cannot be observed or accessed by unauthorized personnel directly or via camera monitoring (including those on cellular phones).	<report findings="" here=""></report>						
6-2 Multi-use/purpose computing systems shall not be used for key generation where any cle or component thereof appears in memory outside the tamper-protected boundary of an SCD							
For example, it is not permitted for the cryptographic key to be passed through the memory of a computer unless it has been specifically tasked for the sole purpose of key loading. Computers that have been specifically purposed and used solely for key loading are permitted for use if all other requirements can be met, including those of Requirement 5 and the controls defined in Requirement 13 of Annex B.							
Additionally, this requirement excludes from its scope computers used only for administration devices that do not have the ability to access clear-text cryptographic keys or components.	n of SCDs, or key-generation						
Single-purpose computers with an installed SCD or a modified PED where clear keying mate secure port on the key-generating SCD to the target SCD (e.g., a POI device) meet this requirements pass through memory of the PC, Requirement 13 of Annex B must be met.							
SCDs used for key generation must meet Requirement 5.1.							
Note: See Requirement 5 and Annex B, Requirement 13.							
<b>6-2.a</b> Examine documented procedures to verify that multi-purpose computing systems are not permitted for key generation where any clear-text secret or private key or component thereof appears in memory outside the tamper-protected boundary of an SCD.	<report findings="" here=""></report>						
<b>6-2.b</b> Observe generation process and examine vendor documentation for each type of key to verify that multi-purpose computing systems are not used for key generation where any clear-text secret or private key or component thereof appears in memory outside the tamper-protected boundary of an SCD except where Requirement 5 and Requirement 13 of Annex B are met.	<report findings="" here=""></report>						



Control Objective 2 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
6-2.c Where single-purpose computers with an installed SCD are used, verify that either:	<report findings="" here=""></report>								
<ul> <li>Clear keying material is injected directly from a secure port on the SCD to the target (e.g., a POI device), or a modified PED.</li> </ul>									
<ul> <li>Where clear keying material passes through memory of the PC, the PC requirements of Requirement 13 of Annex B are met.</li> </ul>									
<b>6-3</b> Printed key components must be printed within blind mailers or sealed in tamper-evident immediately after printing or transcription to ensure that:	and authenticable packaging								
Only approved key custodians can observe the key component.									
Tampering can be visually detected.									
Printers used for this purpose must not be used for other purposes, must not be networked ( must be managed under dual control, including use of a secure room that meets the requirer									
<b>6-3.a</b> Examine documented procedures for printed key components and verify that they require printed key components to be printed within blind mailers or sealed in tamper-evident and authenticable packaging immediately after printing such that:	<report findings="" here=""></report>								
<ul> <li>Only approved key custodians can observe the key component.</li> </ul>									
Tampering can be detected.									
Printers used for this purpose are not used for other purposes, are managed under dual control in a secure room that meets the requirements of 32-9 in Annex B, and are not networked.									
6-3.b Observe processes for printing key components to verify that:	<report findings="" here=""></report>								
<ul> <li>Key components are printed within blind mailers or sealed in tamper-evident and authenticable packaging immediately after printing, such that no one but the authorized custodian ever has physical access to the output;</li> </ul>									
<ul> <li>Printers are used only under dual control and only within a secure room that meets the requirements of 32-9 in Annex B; and</li> </ul>									
Printers are not networked.									
<b>6-3.c</b> Observe blind mailers, tamper-evident and authenticable packaging, or other sealed containers used for key components to verify that components cannot be read from within and that tampering can be detected.	<report findings="" here=""></report>								



Control Objective 2 PCI PIN Security Requirements	Reporting Details:	Sum		Assessn check one	nent Finc ∋)	lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<ul> <li>6-4 Any residue that may contain clear-text keys or components must be destroyed or securely deleted—depending on media—immediately after generation of that key, to prevent disclosure of a key or the disclosure of a key component to an unauthorized individual.</li> <li><i>Examples of where such key residue may exist include (but are not limited to):</i></li> <li><i>Printing material, including ribbons and paper waste</i></li> <li><i>Memory storage of a key-loading device, after loading the key to a different device or system</i></li> <li>Other types of displaying or recording</li> </ul>						
<b>6-4.a</b> Examine documented procedures to identify all locations where key residue may exist. Verify procedures ensure the following:	<report findings="" here=""></report>					
<ul> <li>Any residue that may contain clear-text keys or components is destroyed or securely deleted immediately after generation.</li> </ul>						
<ul> <li>Specific direction as to the method of destruction is included in the procedure.</li> </ul>						
<ul> <li>If a key is generated in a separate device before being exported into the end-use device, confirm that the key and all related critical security parameters (e.g., secret seeds) are deleted (zeroized) from the generation and/or injection device immediately after the transfer to the device(s) that will use the key.</li> </ul>						
• Examine logs of past destructions and deletions to verify that procedures are followed						
<b>6-4.b</b> Observe the destruction process of each identified type of key residue and verify the following:	<report findings="" here=""></report>					
<ul> <li>Any residue that may contain clear-text keys or components is destroyed immediately after generation.</li> </ul>						
The method of destruction is consistent with Requirement 24.						
• If a key is generated in a separate device before being exported into the end-use device, confirm that the key and all related critical security parameters (e.g., secret seeds) are deleted (zeroized) from the generation and/or injection device immediately after the transfer to the device(s) that will use the key.						
6-5 Asymmetric-key pairs must either be:						
Generated by the device that will use the key pair; or						
<ul> <li>If generated externally, the private key of the key pair and all related critical security parameters (for example, secret seeds) must be deleted (zeroized) immediately after the transfer to the device that will use the key pair.</li> </ul>						



Control Objective 2 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
6-5.a Examine documented procedures for asymmetric key generation to confirm that procedures are defined to ensure that asymmetric-key pairs are either:	<report findings="" here=""></report>							
<ul> <li>Generated by the device that will use the key pair, or</li> </ul>								
• If generated externally, the key pair and all related critical security parameters are deleted (zeroized) immediately after the transfer to the device that will use the key pair								
6-5.b Observe key-generation processes to verify that asymmetric-key pairs are either:	<report findings="" here=""></report>							
<ul> <li>Generated by the device that will use the key pair, or</li> </ul>								
<ul> <li>If generated externally, the key pair and all related critical security parameters are deleted (for example, zeroized) immediately after the transfer to the device that will use the key pair.</li> </ul>								
<b>6-6</b> Policy and procedures must exist to ensure that clear-text private or secret keys or their or transmitted across insecure channels. Preclusions include but are not limited to:	components/shares are not							
Dictating verbally keys or components								
Recording key or component values on voicemail								
• Faxing, e-mailing, or otherwise electronically conveying clear-text secret or private keys	or components							
<ul> <li>Conveying clear-text private key shares or secret key components/shares without contain evident and authenticable packaging</li> </ul>	ining them within tamper-							
Writing key or component values into startup instructions								
Affixing (e.g., taping) key or component values to or inside devices								
Writing key or component values in procedure manuals								



Control Objective 2 PCI PIN Security Requirements and Test Procedures	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>6-6.a</b> Examine documented policy and procedures to verify that they include language that prohibits transmitting clear-text private or secret keys or their components/shares across insecure channels, including but not limited to:	<report findings="" here=""></report>		1		1			
Dictating verbally keys or components								
Recording key or component values on voicemail								
• Faxing, e-mailing, or otherwise electronically conveying clear-text keys or components								
<ul> <li>Conveying clear-text private key shares or secret key components/shares without containing them within tamper-evident and authenticable packaging</li> </ul>								
<ul> <li>Writing key or component values into startup instructions</li> </ul>								
<ul> <li>Affixing key or component values to or inside devices</li> </ul>								
Writing key or component values in procedure manual								
<b>6-6.b</b> From observation of key-management processes verify that clear-text private or secret keys or their components are not transmitted across insecure channels, including but not limited to:	<report findings="" here=""></report>							
Dictating verbally keys or components								
<ul> <li>Recording key or component values on voicemail</li> </ul>								
• Faxing, e-mailing, or otherwise electronically conveying clear-text keys or components								
<ul> <li>Conveying clear-text private or secret key components without containing them within tamper-evident, authenticable packaging</li> </ul>								
<ul> <li>Writing key or component values into startup instructions</li> </ul>								
<ul> <li>Affixing key or component values to or inside devices</li> </ul>								
<ul> <li>Writing key or component values in procedure manual</li> </ul>								
Requirement 7: Documented procedures must exist and be demonstrably in use for	r all key-generation processe	s.						
7-1 Written key-generation policies and procedures must exist, and all affected parties (key of technical management, etc.) must be aware of those procedures. Procedures for creating all	· · · ·							



Control Objective 2 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>7-1.a</b> Examine documented key-generation procedures to confirm that they include all aspects of key-generation operations and address all keys in scope.	<report findings="" here=""></report>							
<b>7-1.b</b> Interview those responsible for the key-generation processes (including key custodians, supervisory staff, technical management, etc.) to verify that the documented procedures are known and understood by all affected parties.	<report findings="" here=""></report>							
<b>7-1.c</b> Observe key-generation ceremonies, whether actual or for demonstration purposes, and verify that the documented procedures are demonstrably in use.	<report findings="" here=""></report>							
<b>7-2</b> Logs must exist for the generation of higher-level keys, such as KEKs exchanged with or and BDKs. The minimum log contents include date and time, object name/identifier, purpose individual(s) involved, and tamper-evident package number(s) and serial number(s) of device	e, name and signature of							
<b>7-2.a</b> Examine documented key-generation procedures to verify that all key-generation events for higher-level keys (e.g., KEKs shared with other organizations or otherwise manually loaded as components, and MFKs and BDKs) must be logged.	<report findings="" here=""></report>							
<b>7-2.b</b> Observe demonstrations for the generation of higher-level keys to verify that all key- generation events are logged.	<report findings="" here=""></report>							
<b>7-2.c</b> Examine logs of key generation to verify that exchanges of higher-level keys with other organizations have been recorded and that all required elements were captured.	<report findings="" here=""></report>							



## Control Objective 3: Keys are conveyed or transmitted in a secure manner

Control Objective 3 PCI PIN Security Requirements and Test Procedures	Reporting Details:	Summary of Assessment Finding (check one)							
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
Requirement 8:	<ul> <li>Secret or private keys shall be transferred by:</li> <li>a. Physically forwarding the key as at least two separate key shadifferent communication channels, or</li> <li>b. Transmitting the key in ciphertext form. Public keys must be conveyed in a manner that protects their</li> <li>It is the responsibility of both the sending and receiving parties to ender the sending and the send</li></ul>	r integrity and authenticity.	·				ng		
<b>8-1</b> Keys must be t an SCD.	-1 Keys must be transferred either encrypted, as two or more full-length clear-text components, key shares, or within SCD.								
Where key co	<ul> <li>Clear-text key components/shares must be conveyed in SCDs or using tamper- evident, authenticable packaging.</li> <li>Where key components are transmitted in clear-text using pre-numbered, tamper-evident, authenticable mailers:</li> </ul>								
different	ents/shares must be conveyed using at least two separate communicatic courier services. Components/shares sufficient to form the key must not mmunication channel.								
– Documer	f the serial number of the package are conveyed separately from the pac nted procedures exist and are followed to require that the serial numbers the keying material.	-							
Where SCDs component/sh	are used for conveying components/shares, the mechanisms or data (e. nare from the SCD must be conveyed using a separate communication free eyed in the same manner as a paper component. SCDs must be inspect	rom the SCD channel, or it							
dual-control n	D (i.e., HSM or KLD) is conveyed with pre-loaded secret and/or private knechanisms to become operational. Those mechanisms must not be comon channel as the SCD. SCDs must be inspected for signs of tampering.								
Note: Components	s/shares of encryption keys must be conveyed using different communicative rvices. It is not sufficient to send key components/shares for a specific key compon								
	nether keys are transmitted encrypted, as clear-text s, or within an SCD.	<report findings="" here=""></report>							



Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Finding (check one)						
	and Test Procedures		Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
8-1.b If key components ar authenticable packaging, p	e transmitted in clear text using pre- erform the following:	numbered, tamper-evident,	<report findings="" here=""></report>					
Examine documented authenticable packag	l procedures for sending component ing to verify that:	s in tamper- evident,						
<ul> <li>They define how</li> </ul>	the details of the package serial nur	nber are to be transmitted.						
<ul> <li>There is a require from the package</li> </ul>	ement that the package serial numbe e itself.	er is to be sent separately						
<ul> <li>Each component component.</li> </ul>	is to be sent to/from only the custod	lian(s) authorized for the						
	nunication channels are used to ser st separation by sending on different	1						
<ul> <li>Prior to the use of</li> </ul>	f the components, the serial number	s are to be confirmed.						
transfers that the proc	rvation, interview, and inspection of cess used to transport clear-text key ident, authenticable packaging, is su	components using pre-						
<ul> <li>The package ser</li> </ul>	ial number was transmitted as presc	ribed.						
<ul> <li>The details of the from the package</li> </ul>	e serial number of the package were e itself.	transmitted separately						
	nunication channels were used to se st separation by sending on different							
<ul> <li>Each component component</li> </ul>	was sent to/from only the custodian	(s) authorized for the						
<ul> <li>Prior to the use of</li> </ul>	f the component, the serial number	was confirmed.						



Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
8-1.c Where SCDs are used to convey components/shares:	<report findings="" here=""></report>							
<ul> <li>Examine documented procedures to verify that the mechanism to obtain the keying material (e.g., PIN) is conveyed using separate communication channel from the associated SCD.</li> </ul>								
<ul> <li>Examine documented procedures to verify that each SCD is inspected to ensure that there are not any signs of tampering.</li> </ul>								
<ul> <li>Examine the chain-of-custody document for the SCDs and any transport logs to ensure the movement of each device is tracked and that there is evidence that the SCDs and dual-control mechanisms were separated sufficiently to ensure that no one person gained access to the SCDs and both SCD enablers.</li> </ul>								
<b>8-1.d</b> Where an SCD is conveyed with pre-loaded secret and/or private keys, perform the following:	<report findings="" here=""></report>							
<ul> <li>Examine documented procedures to verify that the SCD requires dual-control mechanisms to become operational.</li> </ul>								
• Examine the documented procedures to ensure the method of shipment of the SCD and dual-control mechanisms (e.g., smart cards or passphrases) are separated in a way that ensures there is no opportunity for one person to gain access to the SCD and both authorization mechanisms (e.g., both smartcards, etc.).								
<ul> <li>Examine documented procedures to verify that the SCD is inspected to ensure there are no signs of tampering.</li> </ul>								
<ul> <li>Examine records of key transfers and interview responsible personnel to verify the mechanisms that make the SCD operational are conveyed using separate communication channels.</li> </ul>								



Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Finding (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>8-2</b> A person with access to one component or share of a secret or private key, or to the media conveying this value, must not have access to other components or shares of this key or to any other medium containing other components or shares of this key that are sufficient to form the necessary threshold to derive the key.								
<b>Note:</b> An m-of-n scheme is a component- or share-allocation scheme where m is the number of shares or components necessary to form the key, and n is the number of the total set of shares or components related to the key. Management of the shares or components must be sufficient to ensure that no one person can gain access to enough of the item to form the key alone.								
E.g., in an m-of-n scheme (which must use a recognized secret-sharing scheme such as Sk key components or shares (i.e., $m = 3$ ) can be used to derive the key, no single individual cat than two components/shares.								
<b>8-2.a</b> Examine documented procedures to verify they include controls to ensure that no single person can gain access to components or shares of this key or to any other medium containing other components or shares of this key that are sufficient to form the necessary threshold to derive the key. Verify procedures include:	<report findings="" here=""></report>	1	1	1				
<ul> <li>Designation of person(s) permitted to convey/receive keys</li> </ul>								
<ul> <li>Reminder that any person with access to one component/share of a key must not have access to other components/shares of this key, or to any other medium conveying any other component or shares sufficient to form the necessary threshold to derive the key.</li> </ul>								
Steps to ensure any person with access to the media conveying a component/share of a key could not have access to other components/shares of this key, or to any other medium conveying any other component of this key that is sufficient to form the necessary threshold to derive the key, without detection.								



Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>8-2.b</b> Observe key-transfer processes and interview personnel to verify that controls are implemented to ensure that no single person can gain access to components or shares of this key or to any other medium containing other components or shares of this key that are sufficient to form the necessary threshold to derive the key. Verify the implemented controls ensure the following:	<report findings="" here=""></report>							
<ul> <li>Only designated custodians can send/receive the component or share.</li> </ul>								
• There is a clear understanding that an individual with access to a key component or key share does not have access to other components/shares of this key or to any other medium conveying any other components or shares of this key that are sufficient to form the necessary threshold to derive the key.								
• There is sufficient evidence to show that a person with access to the media conveying a key component or key share could not have access to other components/shares of this key or to any other medium conveying any other components or shares of this key that are sufficient to form the necessary threshold to derive the key without detection.								
<b>8-2.c</b> Examine records of past key transfers to verify that the method used did not allow for any personnel to have access to components or shares sufficient to form the key.	<report findings="" here=""></report>							
<b>8-3</b> E-mail shall not be used for the conveyance of secret or private keys or their components/shares, even if encrypted, unless the key (or component/share) has already been encrypted in accordance with these requirements— i.e., in an SCD. This is due to the existence of these key values in memory just prior to encryption or subsequent to decryption. In addition, corporate e-mail systems allow the recovery by support staff of the clear text of any encrypted text or files conveyed through those systems.								
Other similar mechanisms, such as SMS, fax, or telephone shall not be used to convey clear	-							
<b>8-3</b> Validate through interviews, observation, and log inspection that e-mail, SMS, fax, telephone, or similar communication is not used as means to convey secret or private keys or key components/shares.	<report findings="" here=""></report>							



Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<ul> <li>8-4 Public keys must be conveyed in a manner that protects their integrity and authenticity. Examples of acceptable methods include:</li> <li>Use of public-key certificates as defined in Annex A that are created by a trusted CA the of Annex A.</li> <li>Validating a hash of the public key sent by a separate channel (for example, mail)</li> <li>Using a MAC (message authentication code) created using the algorithm defined in <i>ISU</i>.</li> <li>Conveyance within an SCD</li> <li>Encrypted</li> <li>Note: Self-signed certificates must not be used as the sole method of authentication.</li> <li>Self-signed root certificates protect the integrity of the data within the certificate but do not get the data. The authenticity of the root certificate is based on the use of secure procedures to Specifically, they must be directly installed into the PIN pad of the ATM or POS device and device subsequent to manufacture.</li> </ul>	O 16609 guarantee the authenticity of distribute them.								
8-4 For all methods used to convey public keys, perform the following:									
<ul> <li>8-4.a Examine documented procedures for conveying public keys to verify that methods are defined to convey public keys in a manner that protects their integrity and authenticity such as:</li> <li>Use of public-key certificates created by a trusted CA that meets the requirements of Annex A</li> <li>Validation of a hash of the public key sent by a separate channel (for example,</li> </ul>	<report findings="" here=""></report>								
<ul> <li>Using a MAC (message authentication code) created using the algorithm defined in ISO 16609</li> </ul>									
Conveyance within an SCD									
• Encrypted									
<b>8-4.b</b> Validate that procedures dictate that self-signed certificates must not be used as the sole method of authentication.	<report findings="" here=""></report>								



Control Objective 3 PCI PIN Security Requirements	Reporting Details:	`						
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
responsible personr	process for conveying public keys, associated logs, and interview nel to verify that the implemented method ensures public keys are ner that protects their integrity and authenticity.	<report findings="" here=""></report>						
Requirement 9: During its transmission, conveyance, or movement between any two locations or organizational entities, any single unencrypted secret or private key component or share must at all times be protected.								
	Sending and receiving locations/entities are equally responsible for the physical protection of the materials involved.							
These requirements also apply to keys moved between locations of the same organization.								
9-1 During the proceetither:	ess to convey it, any single clear-text secret or private key component/sl	hare must at all times be						
Under the continue	inuous supervision of a person with authorized access to this componen	t,						
	curity container or courier mailer (including pre-numbered, tamper-evider hat it can be obtained only by a person with authorized access to it and							
Contained with	in a physically secure SCD.							
<b>Note:</b> No single per private cryptograph	rson shall be able to access or use all components or a quorum of share ic key.	s of a single secret or						
	umented procedures for transmission, conveyance, or movement of wo locations to verify that any single clear-text key component must at	<report findings="" here=""></report>						
<ul> <li>Under the continue component,</li> </ul>	inuous supervision of a person with authorized access to this							
evident, auther	curity container or courier mailer (including pre-numbered, tamper- nticable packaging) in such a way that it can be obtained only by a thorized access to it, or							
<ul> <li>Contained with</li> </ul>	in a physically secure SCD.							



Control Objective 3 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>9-1.b</b> Observe key-management processes, examine associated logs, and interview responsible personnel to verify processes implemented ensure that any single clear-text key component is at all times either:	<report findings="" here=""></report>					-		
<ul> <li>Under the continuous supervision of a person with authorized access to this component, or</li> </ul>								
<ul> <li>Sealed in a security container or courier mailer (including pre-numbered, tamper- evident, authenticable packaging) in such a way that it can be obtained only by a person with authorized access to it, or</li> </ul>								
Contained within a physically secure SCD.								
<ul> <li>9-2 Packaging or mailers (i.e., pre-numbered, tamper-evident packaging) containing clear-t examined for evidence of tampering before being opened. Any sign of package tampering is potentially compromised must be assessed and the analysis formally documented. If comp result is that one person could have knowledge of the key, it must result in the destruction a</li> <li>The set of components</li> </ul>	ndicating a component was romise is confirmed, and the							
Any keys encrypted under this (combined) key								
<b>9-2.a</b> Verify documented procedures include requirements for all packaging or mailers containing clear-text key components to be examined for evidence of tampering before being opened.	<report findings="" here=""></report>	1	1		1	1		
<b>9-2.b</b> Interview responsible personnel and observe processes to verify that all packaging or mailers containing clear-text key components are examined for evidence of tampering before being opened.	<report findings="" here=""></report>							
<b>9-2.c</b> Verify documented procedures require that any sign of package tampering is identified, reported, and ultimately results in the destruction and replacement of both:	<report findings="" here=""></report>							
The set of components								
Any keys encrypted under this (combined) key								



Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>9-2.d</b> Interview responsible personnel and observe processes to verify that, if a package shows signs of tampering indicating a component was potentially compromised, processes are implemented to identify the tampering, report/escalate it, and ultimately result in the destruction and replacement of both:	<report findings="" here=""></report>							
The set of components								
Any keys encrypted under this (combined) key.								
<b>9-2.e</b> Examine records related to any escalated transmittal events. Verify that it resulted in the destruction and replacement of both:	<report findings="" here=""></report>							
The set of components								
<ul> <li>Any keys encrypted under this (combined) key</li> </ul>								
<b>9-3</b> Only an authorized key custodian—and designated backup(s)—shall have physical acc prior to being secured in transmittal packaging and upon removal of a secured key compon packaging.								
<b>9-3.a</b> Verify the existence of a list(s) of key custodians—and designated backup(s)—authorized to have physical access to key components prior to being secured in transmittal packaging and upon removal of a secured key component from transmittal packaging.	<report findings="" here=""></report>							
<b>9-3.b</b> Observe implemented access controls and processes to verify that only those authorized key custodians—and designated backup(s)—have physical access to key components prior to being secured in transmittal packaging and upon removal of a secured key component from transmittal packaging.	<report findings="" here=""></report>							
<b>9-3.c</b> Examine physical access logs (e.g., to security containers for key components) to verify that only the authorized individual(s) have access to each component.	<report findings="" here=""></report>							
9-4 Mechanisms must exist to ensure that only authorized custodians:	1							
Place key components into pre-numbered, tamper-evident, authenticable packaging fo	r transmittal.							
<ul> <li>Check tamper-evident packaging upon receipt for signs of tamper prior to opening tam packaging containing key components.</li> </ul>	per-evident, authenticable							
Check the serial number of the tamper-evident packing upon receipt of a component packing upon re	ackage.							
Note: See Requirement 26 for logging.								



Control Objective 3 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)							
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>9-4.a</b> Verify that a list(s) of key custodians authorized to perform the following activities is defined and documented:	<report findings="" here=""></report>								
<ul> <li>Place the key component into pre-numbered, tamper-evident packaging for transmittal.</li> </ul>									
<ul> <li>Upon receipt, check the tamper-evident packaging for signs of tamper prior to opening the tamper-evident packaging containing the key component.</li> </ul>									
<ul> <li>Check the serial number of the tamper-evident packing upon receipt of a component package.</li> </ul>									
<b>9-4.b</b> Observe implemented mechanisms and processes and examine logs to verify that only the authorized key custodians can perform the following:	<report findings="" here=""></report>								
<ul> <li>Place the key component into pre-numbered, tamper-evident packaging for transmittal.</li> </ul>									
<ul> <li>Upon receipt, check the tamper-evident packaging for signs of tamper prior to opening the tamper-evident packaging containing the key component.</li> </ul>									
<ul> <li>Check the serial number of the tamper-evident packing upon receipt of a component package.</li> </ul>									
<b>9-5</b> Pre-numbered, tamper-evident, authenticable bags shall be used for the conveyance of not in an SCD. Out-of-band mechanisms must be used to verify receipt of the appropriate be <b>Note:</b> Numbered courier bags are not sufficient for this purpose									
<b>9-5</b> Verify that pre-numbered, tamper-evident, authenticable bags are used for the conveyance of clear-text key components and perform the following:	<report findings="" here=""></report>	1	1		1				
<ul> <li>Examine documented procedures to verify they define how details of the serial number are transmitted separately from the package itself.</li> </ul>									
• Observe the method used to transport clear-text key components using tamper- evident mailers, and interview responsible personnel to verify that details of the serial number of the package are transmitted separately from the package itself.									
Examine logs to verify that procedures are followed.									



Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Sum		Assessm check one	nent Find ∋)	lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>9-6</b> If components or shares of multiple keys are being sent simultaneously between the sar custodians, the component/shares for a specific custodian or custodian group can be shippe provided that:	<b>c c</b>					
<ul> <li>The components inside the tamper-evident and authenticable package are in separate packaging (e.g., individually sealed within labeled, opaque envelopes or PIN mailers) to inadvertent observation when the package is opened.</li> </ul>						
<ul> <li>The components are repackaged at receipt into separate tamper-evident and authentic at the receiving location.</li> </ul>	able packages for storage					
Records reflect the receipt of the shipped bag and association with subsequent individu	ual bags.					
<b>9-6.a</b> If components or shares of multiple keys are being sent simultaneously between the same sending and receiving custodians, the component/shares for a specific custodian or custodian group can be shipped in the same TEA bag provided that:	<report findings="" here=""></report>					
<ul> <li>The components inside the tamper-evident and authenticable package are in separate opaque and identifiable packaging (e.g., individually sealed within labeled, opaque envelopes or within PIN mailers) to prevent confusion and/or inadvertent observation when the package is opened.</li> </ul>						
<ul> <li>The components are repackaged at receipt into separate tamper-evident and authenticable packages for storage at the receiving location.</li> </ul>						
<ul> <li>Records reflect the receipt of the shipped bag and association with subsequent individual bags</li> </ul>						
<b>9-6.b</b> Examine logs to verify that procedures are followed.	<report findings="" here=""></report>					



Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findin (check one)						
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
Requirement 10:	All key-encryption keys used to transmit or convey other cryptogr conveyed.	aphic keys must be at least	as strong	as any k	ey transn	nitted or		
	ion keys used to encrypt for transmittal or conveyance of other cryptogr being sent, as delineated in Annex C <sup>1</sup> , except as noted below for RSA							
<ul> <li>TDEA keys use TDEA in an end</li> </ul>								
<ul> <li>A double- or trip</li> </ul>	strength.							
<ul> <li>TDEA keys sha</li> </ul>	Il not be used to protect AES keys.							
<ul> <li>TDEA keys sha</li> </ul>	Il not be used to encrypt keys greater in strength than 112 bits.							
<ul> <li>RSA keys used</li> </ul>	to transmit or convey other keys must have bit strength of at least 80 b	its.						
<ul> <li>RSA keys encry</li> </ul>	pting keys greater in strength than 80 bits shall have bit strength at lea	st 112 bits.						
<b>Note:</b> Entities that are in the process of migrating from older devices to PCI devices approved against version 3 or higher of the PCI POI Security Requirements—and thus have a mixed portfolio of devices—may use RSA key sizes less than 2048 and use SHA-1 to help facilitate the migration. However, in all cases, version 3 or higher devices must implement RSA using key sizes of 2048 or higher and SHA-2 when used for key distribution using asymmetric techniques in accordance with Annex A.								
used to transmit or o	umented procedures to verify there is a requirement that all keys convey other cryptographic keys must be at least as strong as any key eyed, except as noted for RSA keys.	<report findings="" here=""></report>	<u> </u>	·		<u> </u>	·	
through interview of Consider keys manu	twork schematic and the summary listing of cryptographic keys and personnel, identify keys that protect other keys for transmission. ally transferred (e.g., cryptograms sent to an ESO) as well as those erated and transferred (e.g., KEK or TMK encrypting working keys).	<report findings="" here=""></report>						

<sup>&</sup>lt;sup>1</sup> PCI PIN Security Requirements and Test Procedures, v3.0



Control Objective 3 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)							
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>10-1.c</b> Observe key-generation processes for the key types identified above. Verify that all keys used to transmit or convey other cryptographic keys are at least as strong as any key transmitted or conveyed except as noted for RSA keys. To verify this:	<report findings="" here=""></report>								
<ul> <li>Interview appropriate personnel and examine documented procedures for the creation of these keys.</li> </ul>									
<ul> <li>Using the table in Annex C<sup>2</sup>, validate the minimum respective key sizes for TDEA, RSA, Elliptic Curve, DSA, and Diffie Hellman algorithms where used for key encryption.</li> </ul>									
Verify that:									
<ul> <li>TDEA keys used for encrypting keys must be at least double-length keys (have bit strength of 80 bits) and use the TDEA in an encrypt, decrypt, encrypt mode of operation for key-encipherment.</li> </ul>									
<ul> <li>A double- or triple-length TDEA key must not be encrypted with a TDEA key of lesser strength.</li> </ul>									
<ul> <li>TDEA keys are not used to protect AES keys.</li> </ul>									
<ul> <li>TDEA keys shall not be used to encrypt keys greater in strength than 112 bits.</li> </ul>									
<ul> <li>RSA keys used to transmit or convey other keys have bit strength of at least 80 bits.</li> </ul>									
<ul> <li>RSA keys encrypting keys greater in strength than 80 bits have bit strength at least 112 bits.</li> </ul>									
<ul> <li>Any POI device that is version 3 or higher is using RSA with a key size of at least 2048 and SHA-2, where applicable. Use as necessary the device information used in Requirement 1.</li> </ul>									
<b>10-1.d</b> Examine system documentation and configuration files to validate the above, including HSM settings.	<report findings="" here=""></report>								
Requirement 11: Documented procedures must exist and be demonstrably in use f	or all key transmission and c	onveyan	ce proces	sing.					
11-1 Written procedures must exist and be known to all affected parties.									

<sup>2</sup> PCI PIN Security Requirements and Test Procedures, v3.0



Control Objective 3 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>11-1.a</b> Verify documented procedures exist for all key transmission and conveyance processing.	<report findings="" here=""></report>							
<b>11-1.b</b> Interview responsible personnel to verify that the documented procedures are known and understood by all affected parties for key transmission and conveyance processing.	<report findings="" here=""></report>							
<b>11-2</b> Methods used for the conveyance or receipt of keys must be documented.								
<b>11-2</b> Verify documented procedures include all methods used for the conveyance or receipt of keys.	<report findings="" here=""></report>		<u>.</u>	<u>.</u>	•			



Control Objective 4: Key-loading to HSMs and POI PIN-acceptance devices is handled in a secure manner.

Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
Requirement 12:       Secret and private keys must be input into hardware (host) securit manner.         a.       Unencrypted secret or private keys must be entered using the b.         Key-establishment techniques using public-key cryptograph	ne principles of dual control	and split l			a secure	2			
<ul> <li>12-1 The loading of secret or private keys, when from the individual key components or sha using the principles of dual control and split knowledge.</li> <li>Note: Manual key loading may involve the use of media such as paper, smart cards, or other secret cards.</li> </ul>	res, must be performed								
<b>12-1.a</b> Using the summary of cryptographic keys, identify keys that are loaded from components and examine documented process to load each key type (MFK, TMK, PEK, etc.) from components to ensure dual control and split knowledge are required.	<report findings="" here=""></report>	1	1		1	1			
<b>12-1.b</b> Interview appropriate personnel to determine the number of key components for each manually loaded key.	<report findings="" here=""></report>								
<b>12-1.c</b> Witness a structured walk-through/demonstration of various key-loading processes for all key types (MFKs, AWKs, TMKs, PEKs, etc. Verify the number and length of the key components against information provided through verbal discussion and written documentation.	<report findings="" here=""></report>								
<b>12-1.d</b> Verify that the process includes the entry of individual key components by the designated key custodians.	<report findings="" here=""></report>								
12-1.e Ensure key-loading devices can only be accessed and used under dual control.	<report findings="" here=""></report>								
<b>12-1.f</b> Examine locations where keys may have been recorded that don't meet this requirement. As applicable, perform the following:	<report findings="" here=""></report>								
<ul> <li>Test a random sample population of ATMs to ensure key or component values are not affixed inside</li> </ul>									
<ul> <li>Examine HSM startup documentation (including Disaster Recovery or Business Continuity Planning documentation) and procedure manuals to ensure that there are no key or component values recorded.</li> </ul>									



Control Objective 4 PCI PIN Security Requirements and Test Procedures	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>12-2</b> Procedures must be established that will prohibit any one person from having access to components sufficient to form an encryption key when components are removed from and returned to storage for key loading.								
<b>12-2</b> . Examine logs of access to security containers for key components/shares to verify that only the authorized custodian(s) have accessed. Compare the number on the current tamper-evident and authenticable package for each component to the last log entry for that component.	<report findings="" here=""></report>							
Trace historical movement of higher-order keys (MFK, KEK, and BDK) in and out of secure storage to ensure there is no break in the package-number chain that would call into question authorized handling and sufficient storage of the component or share. This must address at a minimum the time frame from the date of the prior audit.								



Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Sum	mary of a	Assessn check one		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>12-3</b> The loading of clear-text cryptographic keys using a key-loading device requires dual cloading session. It shall not be possible for a single person to use the key-loading device to						
Dual control must be implemented using one or more of, but not limited to, the following tec	hniques:					
• Two or more passwords/authentication codes of five characters or more (vendor defaul	It values must be changed)					
<ul> <li>Multiple cryptographic tokens (such as smartcards), or physical keys</li> </ul>						
Physical access controls						
Separate key-loading devices for each component/share						
Note that for devices that do not support two or more passwords/authentication codes, this splitting the single password used by the device into two halves, each half controlled by a s custodian. Each half must be a minimum of five characters.						
Note that passwords/authentication codes to the same object may be assigned to a custodian group team—e.g., custodian team for component A.						
<b>Note:</b> The addition of applications that replace or disable the PCI-evaluated firmware function device approval for each such implementation unless those applications are validated for constraining the security Requirements and listed as such in the approval listings. If modified PEDs are not the KLD approval class, they must be managed in accordance with Annex B Requirement of the KLD approval class.	ompliance to PTS POI validated and approved to					
<b>12-3.a</b> Identify instances where a key-loading device is used to load clear-text keys. Examine documented procedures for loading of clear-text cryptographic keys, to verify:	<report findings="" here=""></report>	1	1			
<ul> <li>Procedures require dual control to authorize any key-loading session.</li> </ul>						
The techniques to be used to achieve dual control are identified.						
<ul> <li>There is a requirement to change any default passwords/authentication codes and set passwords/authentication codes that have at least five characters.</li> </ul>						
<ul> <li>There is a requirement that if passwords/authentication codes or tokens are used, they be maintained separately.</li> </ul>						



Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>12-3.b</b> For each type of production SCDs loaded using a key-loading device, observe the process (e.g., a demonstration) of loading clear-text cryptographic keys and interview personnel. Verify that:	<report findings="" here=""></report>							
<ul> <li>Dual control is necessary to authorize the key-loading session.</li> </ul>								
Expected techniques are used.								
Default passwords/authentication codes are reset.								
<ul> <li>Any passwords/authentication codes used are a minimum of five characters.</li> </ul>								
Any passwords/authentication codes or tokens are maintained separately.								
<b>12-3.c</b> Examine documented records of key-loading to verify the presence of two authorized persons during each type of key-loading activity.	<report findings="" here=""></report>							
<b>12-3.d</b> Ensure that any default dual-control mechanisms (e.g., default passwords/authentication codes—usually printed in the vendor's manual—in a key-loading device) have been disabled or changed.	<report findings="" here=""></report>							
<b>12-4</b> Key components for symmetric keys must be combined using a process such that no a determined without knowledge of the remaining components—for example, via XOR'ing of	•							
The resulting key must only exist within the SCD.								
Note that concatenation of key components together to form the key is unacceptable; e.g., hexadecimal character halves to form a 16-hexadecimal secret key.	concatenating two 8-							
<b>12-4.a</b> Examine documented procedures for combining symmetric-key components and observe processes to verify that key components are combined using a process such that no active bit of the key can be determined without knowledge of the remaining components—e.g., only within an SCD.	<report findings="" here=""></report>				1			
<b>12-4.b</b> Confirm key-component lengths through interview and examination of blank component forms and documented procedures. Examine device configuration settings and interview personnel to verify that key components used to create a key are the same length as the resultant key.	<report findings="" here=""></report>							
<b>12-5</b> Hardware security module (HSM) Master File Keys, including those generated interna exported, must be at least double-length keys and use the TDEA (including parity bits) or A least 128 bits.								



Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>12-5</b> Examine vendor documentation describing options for how the HSM MFK is created and verify the current MFK was created using AES or double- or triple-length TDEA. Corroborate this via observation of processes, with information gathered during the interview process, and procedural documentation provided by the entity under review.	<report findings="" here=""></report>							
<b>12-6</b> Any other SCD loaded with the same key components must combine all entered key c identical process.	omponents using the							
<b>12-6</b> Through examination of documented procedures, interviews, and observation, confirm that any devices that are loaded with the same key components use the same mathematical process to derive the final key.	<report findings="" here=""></report>							
<b>12-7</b> The initial terminal master key (TMK) or initial DUKPT key must be loaded to the device using either asymmetric key-loading techniques or manual techniques—e.g., the device keypad, IC cards, key-loading device, etc. Subsequent loading of the terminal master key or an initial DUKPT key may use techniques described in this document such as:								
Asymmetric techniques								
Manual techniques								
<ul> <li>The existing TMK to encrypt the replacement TMK for download</li> </ul>								
<ul> <li>For AES DUKPT, using the option to derive a key-encryption key called the DUKPT Up can send a device a new initial key encrypted under that key. Note this also requires the also sent</li> </ul>								
Keys shall not be reloaded by any methodology in the event of a compromised device and use.	must be withdrawn from							
<b>12-7.a</b> Examine documented procedures for the loading of TMKs and initial DUKPT keys to verify that they require asymmetric key-loading techniques or manual techniques for initial loading and allowed methods for replacement TMK or initial DUKPT key loading.	<report findings="" here=""></report>							
<b>12-7.b</b> Examine documented procedures to verify that keys are withdrawn from use if they were loaded to a device that has been compromised or gone missing.	<report findings="" here=""></report>							



Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>12-8</b> If key-establishment protocols using public-key cryptography are used to distribute set the requirements detailed in Annex A of this document. For example:	cret keys, these must meet							
A public-key technique for the distribution of symmetric secret keys must:								
<ul> <li>Use public and private key lengths that are in accordance with Annex C<sup>3</sup> for the algorith bits minimum for RSA).</li> </ul>	nm in question (e.g., 1024-							
Use key-generation techniques that meet the current ANSI and ISO standards for the a	algorithm in question.							
• Provide for mutual device authentication for both the host and the POI device or host-to-host if applicable, including assurance to the host that the POI device has (or can compute) the session key, and that no entity other than the POI device specifically identified can possibly compute the session key.								
<b>12-8.a</b> For techniques involving public-key cryptography, examine documentation to illustrate the process, including the size and sources of the parameters involved, and the mechanisms utilized for mutual device authentication for both the host and the POI.	<report findings="" here=""></report>							
<b>12-8.b</b> If key-establishment protocols using public-key cryptography are used to distribute secret keys, verify that the remote key requirements detailed in Annex A of this document are met, including:	<report findings="" here=""></report>							
<ul> <li>Use of public and private key lengths that are in accordance with Annex C for the algorithm in question (e.g., 1024-bits minimum for RSA).</li> </ul>								
<ul> <li>Use of key-generation techniques that meet the current ANSI and ISO standards for the algorithm in question.</li> </ul>								
<ul> <li>Providing for mutual device authentication for both the host and the POI device or host-to-host if applicable.</li> </ul>								

<sup>&</sup>lt;sup>3</sup> PCI PIN Security Requirements and Test Procedures, v3.0



Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>Requirement 13:</b> The mechanisms used to load secret and private keys—such as terminals, external PIN pads, key guns, or similar devices and methods—must be protected to prevent any type of monitoring that could result in the unauthorized disclosure of any component.								
<b>13-1</b> Clear-text secret and private keys and key components must be transferred into an SCD only when it can be ensured that:								
<ul> <li>Any cameras pr text key compor</li> </ul>	esent in the environment must be positioned to ensure they cannot mo nents.	nitor the entering of clear-						
<ul> <li>There is not any the transferred k</li> </ul>	v mechanism at the interface between the conveyance medium and the keys.	SCD that might disclose						
-	d receiving SCDs must be inspected prior to key loading to ensure that pering or unauthorized modification that could lead to the disclosure of	-						
	nspected to detect evidence of monitoring and to ensure dual control p uring key loading.	rocedures are not						
An SCD must tra- identified by the	ansfer a plaintext secret or private key only when at least two authorize device.	ed individuals are uniquely						



Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>13-1</b> Observe key-loading environments, processes, and mechanisms (for example, terminals, PIN pads, key guns, etc.) used to transfer keys and key components. Perform the following:	<report findings="" here=""></report>							
<ul> <li>Ensure that any cameras present are positioned to ensure they cannot monitor the entering of clear-text key components</li> </ul>								
<ul> <li>Examine documented procedures to determine that they require that keys and components are transferred into an SCD only after an inspection of the devices and mechanism; and verify they are followed by observing a demonstration that:</li> </ul>								
<ul> <li>SCDs must be inspected to detect evidence of monitoring and to ensure dual- control procedures are not circumvented during key loading.</li> </ul>								
<ul> <li>An SCD must transfer a plaintext secret or private key only when at least two authorized individuals are identified by the device.</li> </ul>								
<ul> <li>There is not any mechanism (including cabling) at the interface between the conveyance medium and the SCD device that might disclose the transferred keys.</li> </ul>								
<ul> <li>The SCD is inspected to ensure it has not been subject to any prior tampering or unauthorized modification, which could lead to the disclosure of clear-text keying material.</li> </ul>								
<b>13-2</b> Only SCDs shall be used in the loading of clear-text secret or private keys or their com key-loading facility, as delineated in the requirements contained in Annex B. For example, A keyboards or those attached to an HSM shall never be used for the loading of clear-text sec components.	ATM controller (computer)							
<b>Note:</b> The addition of applications that replace or disable the PCI-evaluated firmware function device approval for each such implementation unless those applications are validated for consecurity Requirements and listed as such in the approval listings. If modified PEDs are not the KLD approval class, they must be managed in accordance with Annex B Requirement and the terms of terms of the terms of terms of the terms of terms of terms of the terms of terms o	ompliance to PTS POI validated and approved to							
<b>13-2.a</b> Examine documentation to verify that only SCDs are used in the loading of clear- text secret or private keys or their components outside of a secure key-loading facility, as delineated in this requirement. For example, ATM keyboards or keyboards attached to an HSM shall never be used for the loading of clear-text secret or private keys or their components.	<report findings="" here=""></report>							



Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>13-2.b</b> Observe a demonstration of key loading to verify that only SCDs are used in the loading of clear-text secret or private keys or their components outside of a secure key-loading facility.	<report findings="" here=""></report>							
<b>13-3</b> The loading of plaintext secret or private key components or shares from an electronic thumb drive, fob, or other device used for data transport—directly into a cryptographic devic correct receipt of the component, if applicable) results in either of the following:								
<ul> <li>The electronic media are placed into secure storage and managed under dual control ( they will be required for future re-loading of the component into the cryptographic device</li> </ul>								
<ul> <li>All traces of the component are erased or otherwise destroyed from the electronic med Requirement 24.</li> </ul>	ia in accordance with							
<b>13-3.a</b> Examine documented procedures for the loading of secret or private key components from an electronic medium to a cryptographic device. Verify that procedures define specific instructions to be followed as a result of key loading, including:	<report findings="" here=""></report>							
<ul> <li>Instructions for the medium to be placed into secure storage and managed under dual control (only if there is a possibility it will be required for future re-loading of the component into the cryptographic device); or</li> </ul>								
<ul> <li>Instructions to erase or otherwise destroy all traces of the component from the electronic medium, including the method to use.</li> </ul>								
<b>13-3.b</b> Observe key-loading processes to verify that the loading process results in one of the following:	<report findings="" here=""></report>							
<ul> <li>The medium used for key loading is placed into secure storage and managed under dual control (only if there is a possibility it will be required for future re-loading of the component into the cryptographic device); or</li> </ul>								
<ul> <li>All traces of the component are erased or otherwise destroyed from the electronic medium.</li> </ul>								
13-3.c Examine records/logs of erasures to confirm that:	<report findings="" here=""></report>							
The documented procedure was followed.								
<ul> <li>The method used was in accordance with Requirement 24.</li> </ul>								



Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>13-4</b> For secret or private keys transferred from the cryptographic hardware that generated key-loading device:	the key to an electronic		<u> </u>		1	1		
<b>13-4</b> Examine documented procedures and observe processes for the use of key-loading devices. Perform the following:								
<b>13-4.1</b> The key-loading device must be a physically secure SCD, designed and implement unauthorized disclosure of the key is prevented or detected. <i>Note:</i> A PCI-approved KLD meets this requirement for a SCD.	nted in such a way that any							
<b>13-4.1</b> Verify the key-loading device is a physically secure SCD, designed and implemented in such a way that any unauthorized disclosure of the key is prevented or detected.	<report findings="" here=""></report>	•	· ·					
<b>13-4.2</b> The key-loading device must be under the supervision of a person authorized by n secure container such that no unauthorized person can have access to it.	nanagement or stored in a							
<b>13-4.2</b> Verify the key-loading device is under the supervision of a person authorized by management or stored in a secure container such that no unauthorized person can have access to it.	<report findings="" here=""></report>							
<b>13-4.3</b> The key-loading device must be designed or controlled so that only authorized per can use and enable it to output a key into another SCD. Such personnel must ensure that not inserted between the SCDs.								
<b>13-4.3.a</b> Verify the key-loading device is designed or controlled so that only authorized personnel under dual control can use and enable it to output a key into another SCD.	<report findings="" here=""></report>							
<b>13-4.3.b</b> Verify that both authorized personnel involved in key-loading activity inspect the key-loading device prior to use to ensure that a key-recording device has not been inserted between the SCDs.	<report findings="" here=""></report>							
<b>13-4.4</b> The key-loading device must not retain any information that might disclose the key key for injection into a non-SCD) that was installed in the device or a key that it has succe								



Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>13-4.4</b> Verify the key-loading device does not retain any information that might disclose the key or a key that it has successfully transferred. For example, attempt to output the same value more than one time from the device or cause the device to display check values for its contents both before and after injection and compare.	<report findings="" here=""></report>							
<ul> <li>13-5 Any media (electronic or otherwise) containing secret or private key components or shortyptographic keys must be maintained in a secure storage location and accessible only to When removed from the secure storage location, media or devices containing key components of clear-text cryptographic keys must be in the physical possession of only the designated or only for the minimum practical time necessary to complete the key-loading process.</li> <li>The media upon which a component resides must be physically safeguarded at all times which accesses the residue of the physical process.</li> <li>Key components that can be read (for example, those printed on paper or stored on magne approximate of the physical process).</li> </ul>	authorized custodian(s). ents or used for the injection omponent holder(s), and nen removed from secure tic cards, PROMs, or							
smartcards) must be managed so they are never used in a manner that would result in the in clear text to anyone who is not a designated custodian for that component.								
<b>13-5.a</b> Interview personnel and observe media locations to verify that the media is maintained in a secure storage location accessible only to custodian(s) authorized to access the key components.	<report findings="" here=""></report>							
<b>13-5.b</b> Examine documented procedures for removing media or devices containing key components—or that are otherwise used for the injection of cryptographic keys—from the secure storage location. Verify procedures include the following:	<report findings="" here=""></report>							
• Requirement that media/devices be in the physical possession of only the designated component holder(s).								
<ul> <li>The media/devices are removed from secure storage only for the minimum practical time necessary to complete the key-loading process.</li> </ul>								
<b>13-5.c</b> Interview designated component holder(s) and examine key-management logs to verify that media or devices removed from secure storage are in the physical possession of only the designated component holder(s).	<report findings="" here=""></report>							
<b>13-5.d</b> Interview key-injection personnel and examine logs for the removal of media/devices from secure storage to verify they are removed only for the minimum practical time necessary to complete the key-loading process.	<report findings="" here=""></report>							



Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>13-6</b> If the component is in human-readable form (e.g., printed within a PIN-mailer type document), it must be visible only to the designated component custodian and only for the duration of time required for this person to privately enter the key component into an SCD.								
<b>13-6</b> Validate through interview and observation that printed key components are not opened until just prior to entry into the SCD. Plaintext secret and/or private keys and/or their components are visible only to key custodians for the duration of loading into an SCD.	<report findings="" here=""></report>							
13-7 Written or printed key-component documents must not be opened until immediately pr	ior to use.							
<b>13-7.a</b> Examine documented procedures and confirm that printed/written key-component documents are not opened until immediately prior to use.	<report findings="" here=""></report>	1			1			
<b>13-7.b</b> Observe key-loading processes and verify that printed/written key components are not opened until immediately prior to use.	<report findings="" here=""></report>							
<b>13-8</b> A person with access to any component or share of a secret or private key, or to the m must not have access to other components or shares of this key or to any other medium con or shares of this key that are sufficient to form the necessary threshold to derive the key.								
E.g., in an m-of-n scheme (which must use a recognized secret-sharing scheme such as SI key components or shares (i.e., $m = 3$ ) can be used to derive the key, no single individual c than two components/shares.								
<b>13-8.a</b> Examine documented procedures for the use of key components to verify that procedures ensure that any individual custodian only has access to their assigned components and never has access to sufficient key components to reconstruct a cryptographic key.	<report findings="" here=""></report>							
<b>13-8.b</b> Examine key-component access controls and access logs to verify that any single authorized custodian can and has only had access to their assigned component(s) and cannot access sufficient key components to reconstruct a cryptographic key.	<report findings="" here=""></report>							



Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 14:</b> All hardware and access/authentication mechanisms (e.g., passw under the principle of dual control.	ords/authentication codes) ι	ised for k	ey loading	g must b	e manage	ed		
<ul> <li>14-1 Any hardware and passwords/authentication codes used in the key-loading function m maintained in a secure environment under dual control. Resources (e.g., passwords/auther associated hardware) must be managed such that no single individual has the capability to text keys or their components. This is not to imply that individual access authentication med under dual control.</li> <li>Note: Where key-loading is performed for POIs, the secure environment is defined in Anne</li> </ul>	tication codes and enable key loading of clear- hanisms must be managed							
<ul><li>14-1.a Examine documented procedures to verify they require the following:</li><li>Any hardware used in the key-loading function must be controlled and maintained in a secure environment under dual control.</li></ul>	<report findings="" here=""></report>		· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·			
• Any resources (e.g., passwords/authentication codes and associated hardware) used in the key-loading function must be controlled and managed such that no single individual has the capability to enable key loading of clear-text keys or their components.								
14-1.b Observe key-loading environments and controls to verify the following:	<report findings="" here=""></report>							
• All hardware used in the key-loading function is controlled and maintained in a secure environment under dual control.								
<ul> <li>All resources (e.g., passwords/authentication codes and associated hardware) used for key-loading functions are controlled and managed such that no single individual has the capability to enable key loading.</li> </ul>								
<b>14-2</b> All cable attachments over which clear-text keying material traverses must be examine entity's key-activity operations (system power on/authorization) to ensure they have not bee compromised.								
<b>14-2.a</b> Examine documented procedures to ensure they require that cable attachments are examined at the beginning of an entity's key-activity operations (system power on/authorization).	<report findings="" here=""></report>							
<b>14-2.b</b> Observe key-loading processes to verify that all cable attachments are properly examined at the beginning of an entity's key-activity operations (system power on/authorization).	<report findings="" here=""></report>							



Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>14-3</b> Key-loading equipment usage must be monitored and a log of all key-loading activities purposes containing at a minimum date, time, personnel involved, and number of devices k									
<b>14-3.a</b> Observe key-loading activities to verify that key-loading equipment usage is monitored.	<report findings="" here=""></report>		·		·				
<b>14-3.b</b> Verify logs of all key-loading activities are maintained and contain all required information.	<report findings="" here=""></report>								
<b>14-4</b> Any physical tokens (e.g., brass keys or chip cards) used to enable key-loading must r possession of any one individual who could use those tokens to load secret or private crypter control. These tokens must be secured in a manner similar to key components, including ta packaging and the use of access-control logs for when removed or placed into secure stora	ographic keys under single mper-evident, authenticable								
<b>14-4.a</b> Examine documented procedures for the use of physical tokens (e.g., brass keys or chip cards) to enable key loading. Verify procedures require that physical tokens must not be in the control or possession of any one individual who could use those tokens to load secret or private cryptographic keys under single control.	<report findings="" here=""></report>								
<b>14-4.b</b> Inspect locations and controls for physical tokens to verify that tokens used to enable key loading are not in the control or possession of any one individual who could use those tokens to load secret or private cryptographic keys under single control.	<report findings="" here=""></report>								
<b>14-4.c</b> Examine storage locations for physical tokens to determine adequacy to ensure that only the authorized custodian(s) can access their specific tokens.	<report findings="" here=""></report>								
<b>14-4.d</b> Verify that access-control logs exist and are in use including notation of tamper- evident, authenticable bag numbers.	<report findings="" here=""></report>								
14-4.e Reconcile storage contents to access-control logs.	<report findings="" here=""></report>								
14-5 Default passwords/authentication codes used to enforce dual-control must be changed procedures must exist to require that these password/PINs be changed when assigned per									
<b>14-5.a</b> Verify that documented procedures require default passwords/authentication codes used to enforce dual control are changed.	<report findings="" here=""></report>								
<b>14-5.b</b> Verify that documented procedures exist to require that these passwords/authentication codes be changed when assigned personnel change.	<report findings="" here=""></report>								



Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 15:</b> The loading of keys or key components must incorporate a validation can be ascertained that they have not been tampered with, substitution of the second		e authen	ticity of th	e keys is	ensured,	and it		
<b>15-1</b> A cryptographic-based validation mechanism must be in place to ensure the authentici and/or their components (for example, testing key check values, hashes, or other similar un upon the keys or key components being loaded). See ISO 11568. Where check values are displayed, key-component check values and key check values shall be generated by a cryp all portions of the key or key component are involved in generating the check value. The ch accordance with the following note.	ique values that are based used, recorded, or tographic process such that							
<b>Note:</b> Check values are computed by encrypting an all-zero block using the key or compon- using the leftmost n-bits of the result; where n is at most 24 bits (6 hexadecimal digits/3 byte be used for TDEA or TDEA must use, and AES shall use a technique where the KCV is call zero block using the CMAC algorithm as specified in ISO 9797-1 (see also NIST SP 800-38 the leftmost n-bits of the result, where n is at most 40 bits (10 hexadecimal digits). The bloc function is the same as the block cipher of the key itself. A TDEA key or a component of a T using the TDEA block cipher, while a 128-bit AES key or component will be MACed using the	es). Either this method must culated by MACing an all- BB). The check value will be k cipher used in the CMAC FDEA key will be MACed							
<b>15-1.a</b> Examine documented procedures to verify a cryptographic-based validation mechanism is in place to ensure the authenticity and integrity of keys and/or components.	<report findings="" here=""></report>							
<b>15-1.b</b> Observe the key-loading processes to verify that the defined cryptographic-based validation mechanism used to ensure the authenticity and integrity of keys and components is being used and are verified by the applicable key custodians.	<report findings="" here=""></report>							
<b>15-1.c</b> Verify that the methods used for key validation are consistent with ISO 11568—for example, if check values are used, they are in accordance with this requirement.	<report findings="" here=""></report>							
<b>15-2</b> The public key must have its authenticity and integrity ensured. In order to ensure auth public key must be encrypted in accordance with Annex C, or if in plaintext form, must:	nenticity and integrity, a							
Be within a certificate as defined in Annex A; or								
Be within a PKCS#10 (authentication and integrity occurs via other mechanisms); or								
Be within an SCD; or								
Have a MAC (message authentication code) created using the algorithm defined in ISC	0 16609.							
<b>15-2.a</b> Interview personnel and review documented procedures to verify that all public keys exist only in an approved form.	<report findings="" here=""></report>							



Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)					
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>15-2.b</b> Observe public-key stores and mechanisms to verify that public keys exist only in an approved form.	<report findings="" here=""></report>						
Requirement 16: Documented procedures must exist and be demonstrably in use (i	ncluding audit trails) for all k	ey-loadin	ng activitie	es.			
<b>16-1</b> Documented key-loading procedures must exist for all devices (e.g., HSMs and POIs), cryptographic key loading must be aware of those procedures.	and all parties involved in						
16-1.a Verify documented procedures exist for all key-loading operations.	<report findings="" here=""></report>						
<b>16-1.b</b> Interview responsible personnel to verify that the documented procedures are known and understood by all affected parties for all key-loading operations.	<report findings="" here=""></report>						
<b>16-1.c</b> Observe key-loading process for keys loaded as components and verify that the documented procedures are demonstrably in use. This may be done as necessary on test equipment—e.g., for HSMs.	<report findings="" here=""></report>						
16-2 All key-loading events must be documented. Audit trails must be in place for all key-loading events must be documented.	ading events.						
<b>16-2</b> Examine log files and observe logging processes to verify that audit trails are in place for all key-loading events.	<report findings="" here=""></report>						



Control Objective 5: Keys are used in a manner that prevents or detects their unauthorized usage.

Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 17:</b> Unique, secret cryptographic keys must be in use for each identific logically separate systems within the same organization.	able link between host comp	uter syste	ems betwo	een two o	organizat	tions or		
<b>17-1</b> Where two organizations or logically separate systems share a key to encrypt PINs (in keys used to encrypt the PIN-encryption key) communicated between them, that key must lorganizations or logically separate systems and must not be given to any other organization systems.	be unique to those two							
<b>17-1.a</b> Examine the documented key matrix and operational procedures and interview personnel to determine whether any keys are shared between organizations.	<report findings="" here=""></report>		·					
<b>17-1.b</b> For all keys shared between two organizations (including key-encryption keys used to encrypt a PIN-encryption key) perform the following:	<report findings="" here=""></report>							
• Generate or otherwise obtain key-check values for any key-encipherment keys (KEKs) to verify key uniqueness between the two organizations. A random sample may be used where more than ten zone connections are in use. This is not intended to be based on values retained on paper or otherwise sent as part of the original conveyance of the keying material, but rather on values generated from stored zone production keys from the production host database. Cryptograms may be used for this purpose if it is verified that the same MFK variant is used to encrypt the KEKs.								
<ul> <li>If a remote key-establishment and distribution scheme is implemented between networks, examine public keys and/or hash values and/or fingerprints of the keys to verify key uniqueness of the asymmetric-key pairs.</li> </ul>								
<ul> <li>Compare key check values against those for known or default keys to verify that known or default key values are not used.</li> </ul>								



Control Objective 5 PCI PIN Security Requirements and Test Procedures	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 18</b> : Procedures must exist to prevent or detect the unauthorized subs another or the operation of any cryptographic device without legiti		lacemen	t and key	misuse)	of one ke	ey for		
<b>18-1</b> Synchronization errors must be monitored to help reduce the risk of an adversary's su to them. Procedures must exist and be followed for investigating repeated synchronization of such as online key exchanges or transmission or processing of PIN-based transactions.								
<b>Note:</b> Multiple synchronization errors in PIN translation may be caused by the unauthorized of one stored key for another, or the replacement or substitution of any portion of a TDEA k unencrypted.								
<b>18-1.a</b> Verify procedures have been implemented for monitoring and alerting to the presence of multiple cryptographic synchronization errors.	<report findings="" here=""></report>		1		1			
18-1.b Verify that implemented procedures include:	<report findings="" here=""></report>							
<ul> <li>Specific actions that determine whether the legitimate value of the cryptographic key has changed. (For example, encryption of a known value to determine whether the resulting cryptogram matches the expected result.)</li> </ul>								
<ul> <li>Proactive safeguards that shut down the source of any synchronization errors and start an investigative process to determine the true cause of the event.</li> </ul>								
<b>18-2</b> To prevent or detect usage of a compromised key, key-component packaging, or cont tampering indicating a component was potentially compromised must be assessed and the documented. If compromise is confirmed, and the result is that one person could have know result in the discarding and invalidation of the component and the associated key at all located to the term.	analysis formally vledge of the key, it must							
<b>18-2.a</b> Verify that documented procedures are documented require that key-component packaging/containers showing signs of tampering indicating a component was potentially compromised are assessed and the analysis is formally documented. If compromise is confirmed, and the result is that one person could have knowledge of the key, it must result in the destruction and invalidation of all associated key components and the resultant cryptographic key(s) at all locations where they exist.	<report findings="" here=""></report>							



Control Objective 5 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>18-2.b</b> Interview personnel and observe processes to verify procedures are implemented to require that key-component packaging/containers showing signs of tampering indicating a component was potentially compromised are assessed and the analysis is formally documented. If compromise is confirmed, and the result is that one person could have knowledge of the key, it results in the destruction and invalidation of all associated key components and the resultant cryptographic key(s) at all locations where they exist.	<report findings="" here=""></report>				-	1			
<b>18-3</b> Encrypted symmetric keys must be managed in structures called key blocks. The key usage must be cryptographically bound to the key using accepted methods.									
The phased implementation dates are as follows:									
<ul> <li>Phase 1 – Implement Key Blocks for internal connections and key storage within Service Provider Environments – this would include all applications and databases connected to hardware security modules (HSM). Effective date: 1 June 2019.</li> </ul>									
<ul> <li>Phase 2 – Implement Key Blocks for external connections to Associations and Network 2021.</li> </ul>	ks. Effective date: <b>1 June</b>								
<ul> <li>Phase 3 – Implement Key Block to extend to all merchant hosts, point-of-sale (POS) d date: 1 June 2023.</li> </ul>	evices and ATMs. Effective								
Acceptable methods of implementing the integrity requirements include, but are not limited	to:								
<ul> <li>A MAC computed over the concatenation of the clear-text attributes and the encipherer which includes the key itself,</li> </ul>	d portion of the key block,								
<ul> <li>A digital signature computed over that same data,</li> </ul>									
• An integrity check that is an implicit part of the key-encryption process such as that wh wrap process specified in ANSI X9.102.	ich is used in the AES key-								
<b>18-3</b> Using the cryptographic-key summary to identify secret keys conveyed or stored, examine documented procedures and observe key operations to verify that secret cryptographic keys are managed as key blocks using mechanisms that cryptographically bind the key usage to the key at all times via one of acceptable methods or an equivalent.	<report findings="" here=""></report>								
Where key blocks are not implemented, identify and examine project plans to implement in accordance with the prescribed timeline.									



Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
Requirement 19: Cryptographic keys must be used only for their sole intended purp	ose and must never be share	ed betwe	en produc	ction and	l test sys	tems.		
<b>19-1</b> Encryption keys must be used only for the purpose they were intended—i.e., key-encryption keys must not to be used as PIN-encryption keys, PIN-encryption keys must not be used for account data, etc. Derivation Keys may be derived into multiple keys, each with its own purpose. For example, a DUKPT Initial Key may be used to derive both a PIN encryption key and a data encryption key. The derivation key would only be used for its own purpose, key derivation. This is necessary to limit the magnitude of exposure should any key(s) be compromised. Using keys only as they are intended also significantly strengthens the security of the underlying system.								
<b>19-1.a</b> Examine key-management documentation (e.g., the cryptographic key inventory) and interview key custodians and key-management supervisory personnel to verify that cryptographic keys are defined for a specific purpose.	<report findings="" here=""></report>							
<b>19-1.b</b> Using a sample of device types, validate via examination of check values, terminal definition files, etc. that keys used for key encipherment or PIN encipherment are not used for any other purpose.	<report findings="" here=""></report>							
19-2 Private keys:								
<ul> <li>Must be used only for a single purpose—a private key must only be used for either dec signatures, but not both (except for transaction-originating POI devices).</li> </ul>	ryption or for creating digital							
Must never be used to encrypt other keys.								
When used for remote key distribution, must not be used in connection with any other p	ourpose.							
<b>Note:</b> The restriction does not apply to certificate signing requests e.g., PKCS #10.								
<b>19-2</b> Examine key-management documentation and interview key custodians and key- management supervisory personnel to verify that private keys are:	<report findings="" here=""></report>				·			
<ul> <li>Used only to create digital signatures or to perform decryption operations.</li> </ul>								
<ul> <li>Used only for a single purpose—a private key must only be used for either decryption or for creating digital signatures, but not both (except for POI devices).</li> </ul>								
Never used to encrypt other keys.								
• Not used in connection with any other purpose when used for remote key distribution.								
<b>19-3</b> Public keys must only be used for a single purpose—a public key must only be used for verifying digital signatures, but not both (except for transaction-originating POI devices).	or either encryption or for							



and Test Procedures	ssessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
nagement supervisory personnel to verify that public keys are only used: To perform encryption operations or to verify digital signatures. For a single purpose—a public key must only be used for either encryption or for	eport Findings Here>					
For a single purpose—a public key must only be used for either encryption or for						
4 Keys must never be shared or substituted between production and test/development systems	ms:					
Key used for production must never be present or used in a test system, and						
Keys used for testing must never be present or used in a production system.						
<b>te:</b> For logically partitioned HSMs and computing platforms, if one or more logical partitions of a ed for production and one or more other logical partitions are used for testing, including QA or si figuration that is impacted—computing platform(s) and networking equipment—must be manage duction.	similar, the entire					
<b>4.a</b> Examine key-management documentation and interview key custodians and key- nagement supervisory personnel to verify that cryptographic keys are never shared or stituted between production and development systems.	eport Findings Here>					
<b>4.b</b> Observe processes for generating and loading keys into in production systems to ure that they are in no way associated with test or development keys.	eport Findings Here>					
<b>4.c</b> Observe processes for generating and loading keys into in test systems to ensure t they are in no way associated with production keys.	eport Findings Here>					
<b>4.d</b> Compare check, hash, cryptogram, or fingerprint values for production and //development keys for higher-level keys (e.g., MFKs, KEKs shared with other network les and BDKs) to verify that development and test keys have different key values.	eport Findings Here>					
<b>19-5</b> If a business rationale exists, a production platform (HSM and server/standalone computer) may be temporarily used for test purposes. However, all keying material must be deleted from the HSM(s) and the server/computer platforms prior to testing. Subsequent to completion of testing, all keying materials must be deleted, the server/computer platforms must be wiped and rebuilt from read-only media, and the relevant production keying material restored using the principles of dual control and split knowledge as stated in these requirements.						
all times the HSMs and servers/computers must be physically and logically secured in accordan uirements.	ance with these					
te: This does not apply to HSMs that are never intended to be used for production.						



Control Objective 5 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Finding (check one)							
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>19-5</b> Interview personnel to determine whether production platforms are ever temporarily used for test purposes.	<report findings="" here=""></report>								
If they are, verify that documented procedures require that:									
<ul> <li>All keying material is deleted from the HSM(s) and the server /computer platforms prior to testing.</li> </ul>									
<ul> <li>Subsequent to completion of testing, all keying materials must be deleted and the server/computer platforms must be wiped and rebuilt from read-only media.</li> </ul>									
<ul> <li>Prior to reuse for production purposes the HSM is returned to factory state.</li> </ul>									
<ul> <li>The relevant production keying material is restored using the principles of dual control and split knowledge as stated in these requirements.</li> </ul>									
<ul> <li>Requirement 20: All secret and private cryptographic keys ever present and used f transaction-originating terminal (e.g., PED) that processes PINs r</li> <li>20-1 POI devices must each implement unique secret and private keys for any function direction</li> </ul>	nust be unique (except by cha ectly or indirectly related to				ment) by	a D			
transaction-originating terminal (e.g., PED) that processes PINs n	nust be unique (except by cha ectly or indirectly related to	ance) to t	hat devic	е.					
<b>20-1</b> POI devices must each implement unique secret and private keys for any function dire PIN protection. These keys must be known only in that device and in hardware security mo	nust be unique (except by cha actly or indirectly related to dules (HSMs) at the	ance) to t	hat devic	е.					
<b>20-1</b> POI devices must each implement unique secret and private keys for any function dire PIN protection. These keys must be known only in that device and in hardware security mo minimum number of facilities consistent with effective system operations. Disclosure of the key in one such device must not provide any information that could be fea	nust be unique (except by char ectly or indirectly related to dules (HSMs) at the asibly used to determine the tkeys, firmware-	ance) to t	hat devic	е.					
<ul> <li>transaction-originating terminal (e.g., PED) that processes PINs manual of the protection. These keys must be known only in that device and in hardware security momentary manual of facilities consistent with effective system operations.</li> <li>Disclosure of the key in one such device must not provide any information that could be feakey in any other such device.</li> <li>This means not only the PIN-encryption key(s), but also keys that are used to protect other authentication keys, payment-application authentication and display-prompt control keys.</li> </ul>	nust be unique (except by char ectly or indirectly related to idules (HSMs) at the asibly used to determine the tweys, firmware- as stated in the requirement,	ance) to t	hat devic	е.					
<b>20-1</b> POI devices must each implement unique secret and private keys for any function dire PIN protection. These keys must be known only in that device and in hardware security mo minimum number of facilities consistent with effective system operations. Disclosure of the key in one such device must not provide any information that could be fea- key in any other such device. This means not only the PIN-encryption key(s), but also keys that are used to protect other authentication keys, payment-application authentication and display-prompt control keys. A this does not apply to public keys resident in the device. POI private keys must not exist anywhere but the specific POI they belong to, except where	nust be unique (except by char ectly or indirectly related to idules (HSMs) at the asibly used to determine the tweys, firmware- as stated in the requirement,	ance) to t	hat devic	е.					
<ul> <li>transaction-originating terminal (e.g., PED) that processes PINs maintenance of the terminal (e.g., PED) that processes PINs maintenance of the terminal terminal (e.g., PED) that processes PINs maintenance of the terminal terminal (e.g., PED) that processes PINs maintenance of the terminal terminal terminal (e.g., PED) that processes PINs maintenance of the terminal terminal terminal (e.g., PED) that processes PINs maintenance of terminal terminal terminal (e.g., PED) that processes PINs maintenance of terminal terminal terminal terminal (e.g., PED) that processes PINs maintenance of the terminal te</li></ul>	nust be unique (except by cha ectly or indirectly related to idules (HSMs) at the asibly used to determine the keys, firmware- as stated in the requirement, e generated external to the	ance) to t	hat devic	е.					



Control Objective 5 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>20-1.b</b> Observe HSM functions and procedures for generating and loading secret and private keys for use in transaction-originating POIs to verify that unique keys are generated and used for each POI device.	<report findings="" here=""></report>							
<b>20-1.c</b> Examine check values, hashes, or fingerprint values for a sample of cryptographic keys from different POI devices to verify private and secret keys are unique for each POI device. This can include comparing a sample of POI public keys (multiple devices for each POI vendor used) to determine that the associated private keys stored in the POI devices are unique per device—i.e., the public keys are unique.	<report findings="" here=""></report>							
<b>20-2</b> If a transaction-originating terminal (for example POI device) interfaces with more than the transaction-originating terminal SCD must have a completely different and unique key o acquiring organization. These different keys, or sets of keys, must be totally independent ar another.	r set of keys for each							
<b>20-2a</b> Determine whether any transaction-originating terminals interface with multiple acquiring organizations. If so:	<report findings="" here=""></report>	-						
<ul> <li>Examine documented procedures for generating all types of keys and verify the procedures ensure that unique keys or sets of keys are used for each acquiring organization and are totally independent and not variants of one another.</li> </ul>								
<ul> <li>Interview personnel and observe key-generation processes to verify that unique keys or sets of keys are generated for each acquiring organization.</li> </ul>								
<b>20-2b</b> Observe processes for generation and injection of keys into a single POI for more than one acquiring organization, to verify:	<report findings="" here=""></report>							
<ul> <li>The POI has a completely different and unique key, or set of keys, for each acquiring organization.</li> </ul>								
<ul> <li>These different keys, or sets of keys, are totally independent and not variants of one another.</li> </ul>								



Control Objective 5 PCI PIN Security Requirements Assessor's Response	Reporting Details:	<u> </u>						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>20-3</b> Keys that are generated by a derivation process and derived from the same Base (master) Derivation Key must use unique data for the derivation process as defined in <i>ISO 11568</i> so that all such cryptographic devices receive unique initial secret keys. Base derivation keys must not ever be loaded onto POI devices—i.e., only the derived key is loaded to the POI device.								
This requirement refers to the use of a single "base" key to derive initial keys for many different POIs, using a key- derivation process as described above. This requirement does not preclude multiple unique keys being loaded on a single device, or for the device to use a unique key for derivation of other keys once loaded, for example, as done with DUKPT.								
<b>Note:</b> The same BDK with the same KSN installed in multiple injection systems or installed same injection system will not meet uniqueness requirements.	multiple times within the							
<b>20-3.a</b> Examine documented procedures and observe processes for generating initial keys. Verify the following is implemented where initial keys are generated by a derivation process and derived from the same Base Derivation Key:	<report findings="" here=""></report>							
<ul> <li>Unique data is used for the derivation process such that all transaction-originating POIs receive unique secret keys.</li> </ul>								
<ul> <li>Key derivation is performed prior to a key being loaded/sent to the recipient transaction-originating POI.</li> </ul>								
Examine key-generation/injection logs to ensure that sequential values included in unique key derivation are not repeated.								
<b>20-3.b</b> Verify that derivation keys used to generate keys for multiple devices are never loaded into a POI device.	<report findings="" here=""></report>							
<b>20-4</b> Entities processing or injecting DUKPT or other key-derivation methodologies must inc strategy in their environments. Segmentation must use one or more of the following techniq								
Different BDKs for each financial institution								
Different BDKs by injection vendor (e.g., ESO), terminal manufacturer, or terminal mod								
Different BDKs by geographic region, market segment, processing platform, or sales up	nit							



PCI PIN Security Requirements and Test Procedures	Reporting Details: Assessor's Response	Summary of Assessment Finding (check one)						
		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>20-4</b> Examine documented key-generation and injection procedures to verify that entities processing or injecting DUKPT or other key-derivation methodologies incorporate a segmentation strategy in their environments using one or more of the following techniques:	<report findings="" here=""></report>							
Different BDKs for each financial institution								
<ul> <li>Different BDKs by injection vendor (e.g., ESO), terminal manufacturer, or terminal model</li> </ul>								
<ul> <li>Different BDKs by geographic region, market segment, processing platform, or sales unit</li> </ul>								



## Control Objective 6: Keys are administered in a secure manner.

Control Objective 6 PCI PIN Security Requirements		Reporting Details:	Summary of Assessment Findings (check one)						
	Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
	d for enciphering PIN-encryption keys or for PIN e s, must never exist outside of SCDs, except when e knowledge.								
<ul> <li>At least two separate key shares (s</li> <li>Encrypted with a key of equal or g</li> <li>Contained within a secure cryptog</li> </ul>	clear-text keying material outside of a SCD when use	ed within a secure room in							
	es for key storage and usage to verify that secret or approved forms at all times when stored.	<report findings="" here=""></report>	1	1	1	1	1		
<b>21-1.b</b> Observe key stores to verify tha approved forms at all times when store	t secret or private keys only exist in one or more d.	<report findings="" here=""></report>							
21-2 Wherever key components/shares	s are used, they have the following properties:								
<b>21-2</b> Examine documented procedures all instances where key components/sh	and interview responsible personnel to determine nares are used.	<report findings="" here=""></report>	·	-					
<b>21-2.1</b> Knowledge of any one key con cryptographic key.	mponent/share does not convey any knowledge of ar	ny part of the actual							
	ng key components/shares to verify that knowledge es not convey any knowledge of any part of the	<report findings="" here=""></report>							
21-2.2 Construction of the cryptograp	phic key requires the use of at least two key component	ents/shares.							
21-2.2 Observe processes for construction key components/shares are required	ucting cryptographic keys to verify that at least two for each key construction.	<report findings="" here=""></report>							
21-2.3 Each key component/share ha	as one or more specified authorized custodians.	•							
PCI Tomplato for Poport on Compliana	e for use with PCI PIN Security Requirements v3.0					Λ.Λ	arch 2019		



Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>21-2.3.a</b> Examine documented procedures for the use of key components/shares and interview key custodians and key-management supervisory personnel to verify that each key component/share is assigned to a specific individual, or set of individuals, who are designated as key custodians for that component/share.	<report findings="" here=""></report>							
<b>21-2.3.b</b> Observe key-component/share access controls and key-custodian authorizations/assignments to verify that all individuals with access to key components/shares are designated as key custodians for those components/shares.	<report findings="" here=""></report>							
<b>21-2.4</b> Procedures exist to ensure that no custodian ever has access to sufficient key com secret or private key to reconstruct a cryptographic key.	ponents or shares of a							
For example, in an m-of-n scheme (which must use a recognized secret-sharing scheme such as Shamir), where only two of any three shares are required to reconstruct the cryptographic key, a custodian must not have current or prior knowledge of more than one share. If a custodian was previously assigned share A, which was then reassigned, the custodian must not then be assigned share B or C, as this would give them knowledge of two shares, which gives them ability to recreate the key.								
In an m-of-n scheme where n=5 and where three shares are required to reconstruct the cr custodian may be permitted to have access to two of the key shares (for example, share A second custodian (with, in this example, share C) would be required to reconstruct the fina control is maintained	A and share B); and a							
21-2.4.a Examine documented procedures for the use of key components/shares to verify that procedures ensure that any custodian never has access to sufficient key components or shares to reconstruct a secret or private cryptographic key.	<report findings="" here=""></report>		·,					
21-2.4.b Examine key-component/share access controls and access logs to verify that authorized custodians cannot access sufficient key components or shares to reconstruct a secret or private cryptographic key.	<report findings="" here=""></report>							
21-3 Key components/shares must be stored as follows:	·							
<b>21-3</b> Examine documented procedures, interview responsible personnel, and inspect key- component/share storage locations to verify that key components/shares are stored as outlined in Requirements 21-3.1 through 21-3.3 below.	<report findings="" here=""></report>							



Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Sum	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>21-3.1</b> Key components that exist in clear text outside of an SCD must be sealed in individe tamper-evident, authenticable packaging that prevents the determination of the key comport damage to the packaging.	· · · · · · · · · · · · · · · · · · ·								
<b>Note:</b> Tamper-evident, authenticable packaging—opacity may be envelopes within tampe to secure key components must ensure that the key component cannot be determined. For paper, opacity may be sufficient, but consideration must be given to any embossing or oth "read" the component without opening of the packaging. Similarly, if the component is stor other media that can be read without direct physical contact, the packaging should be des access to the key component.	r components written on er possible methods to ed on a magnetic card, or								
<b>21-3.1.a</b> Examine key components and storage locations to verify that components are stored in opaque, pre-numbered, tamper-evident packaging that prevents the determination of the key component without noticeable damage to the packaging.	<report findings="" here=""></report>								
<b>21-3.1.b</b> Inspect any tamper-evident packaging used to secure key components—e.g., is the package sufficiently opaque to prevent reading of a component—and ensure that it prevents the determination of the key component without visible damage to the packaging.	<report findings="" here=""></report>								
<b>21-3.1.c</b> Ensure clear-text key components do not exist in non-secure containers such as databases or in software programs.	<report findings="" here=""></report>								
<b>21-3.1.d</b> Confirm that start-up instructions and other notes used by service technicians do not contain initialization-key values written in the clear (e.g., at the point in the checklist where the keys are entered).	<report findings="" here=""></report>								
<b>21-3.2</b> Key components/shares for each specific custodian must be stored in a separate, s accessible only by the custodian and/or designated backup(s).	secure container that is								
<b>Note:</b> Furniture-based locks or containers with a limited set of unique keys—for example, sufficient to meet this requirement.	desk drawers—are not								
Components/shares for a specific key that are stored in separate envelopes, but within the place reliance upon procedural controls and do not meet the requirement for physical barr									



Control Objective 6 PCI PIN Security Requirements		Reporting Details:	Summary of Assessment Findings (check one)						
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
21-3.2 Inspect eac	ch key component/share storage container and verify the following:	<report findings="" here=""></report>							
<ul> <li>Key compone containers.</li> </ul>	ents/shares for different custodians are stored in separate secure								
<ul> <li>Each secure backup(s).</li> </ul>	container is accessible only by the custodian and/or designated								
	nponent/share is stored on a token, and an access code (e.g., a PIN or ed to access the token, only that token's owner—or designated backup(s d its access code.								
that if a key is stor used to access the	esponsible personnel and observe implemented processes to verify red on a token, and an access code (PIN or similar mechanism) is e token, only that token's owner—or designated backup(s)—has h the token and its access code.	<report findings="" here=""></report>	<u>.</u>			-			
Requirement 22:	Procedures must exist and must be demonstrably in use to replace encrypted with the compromised key), and keys derived from the c								
22-1 Procedures for	known or suspected compromised keys must include the following:								
<b>22-1</b> Verify document keys that includes a	nted procedures exist for replacing known or suspected compromised Il of the following:	<report findings="" here=""></report>	1	1		1			
22-1.1 Key compo the SCD has beer	onents/shares are never reloaded when there is any suspicion that either a compromised.	the originally loaded key or							
key components/s	esponsible personnel and observe implemented processes to verify shares are never reloaded when there is any suspicion that either the ey or the SCD has been compromised.	<report findings="" here=""></report>							
	ized alteration is suspected, new keys are not installed until the SCD has d that the equipment has not been subject to any form of unauthorized n								
that if unauthorize	esponsible personnel and observe implemented processes to verify d alteration is suspected, new keys are not installed until the SCD has nd assurance reached that the equipment has not been subject to any red modification.	<report findings="" here=""></report>							



Control Objective 6 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>22-1.3</b> A secret or private cryptographic key must be replaced with a new key whenever the compromise of the original key is known. Suspected compromises must be assessed, and the analysis formally documented. If compromise is confirmed, the key must be replaced. In addition, all keys encrypted under or derived using that key must be replaced with a new key within the minimum feasible time. The replacement key must not be a variant or an irreversible transformation of the original key. Compromised keys must not be used to facilitate replacement with a new key(s).								
<b>Note:</b> The compromise of a key must result in the replacement and destruction of that key reversible transformations of that key, as well as all keys encrypted under or derived from								
Known or suspected substitution of a secret key must result in the replacement of that key of how the key was substituted, any associated key-encipherment keys that may have bee								
<b>22-1.3</b> Interview responsible personnel and observe implemented processes to verify that if compromise of the cryptographic key is suspected, an assessment and analysis is performed. If compromise is confirmed, all the following are performed:	<report findings="" here=""></report>					<u>.</u>		
• Use of that key is halted, and the key is replaced with a new unique key.								
<ul> <li>Any systems, devices, or processing involving subordinate keys that have been calculated, derived, or otherwise generated, loaded, or protected using the compromised key are included in the key-replacement process.</li> </ul>								
• The replacement key must not be a variant of the original key, or an irreversible transformation of the original key.								



Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>22-1.4</b> A documented escalation process and notification to organizations that currently sh shared the key(s), including:	are or have previously							
Identification of key personnel								
A damage assessment including, where necessary, the engagement of outside consultants								
Specific actions to be taken with system software and hardware, encryption keys, enc	rypted data, etc.							
<b>22-1.4.a</b> Interview responsible personnel and examine documented procedures to verify key personnel are identified and that the escalation process includes notification to organizations that currently share or have previously shared the key(s).	<report findings="" here=""></report>							
22-1.4.b Verify notifications include the following:	<report findings="" here=""></report>							
<ul> <li>A damage assessment including, where necessary, the engagement of outside consultants.</li> </ul>								
<ul> <li>Details of specific actions to be taken with system software and hardware, encryption keys, encrypted data, etc.</li> </ul>								
22-1.5 Identification of specific events that would indicate a compromise may have occurre include but are not limited to:	ed. Such events must							
Missing secure cryptographic devices								
Tamper-evident seals or authenticable envelope numbers or dates and times not agree	eing with log entries							
Tamper-evident seals or authenticable envelopes that have been opened without authorization or show signs of attempts to open or penetrate								
Indications of physical or logical access attempts to the processing system by unauther	orized individuals or entities							
<ul> <li>Failure to document that a secret or private key has been managed using the principle knowledge from its date of creation</li> </ul>	es of dual control and split							



Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>22-1.5</b> Interview responsible personnel and examine documented procedures to verify that specific events that may indicate a compromise are identified. This must include, as a minimum, the following events:	<report findings="" here=""></report>							
Missing SCDs								
<ul> <li>Tamper-evident seals or authenticable envelope numbers or dates and times not agreeing with log entries</li> </ul>								
<ul> <li>Tamper-evident seals or authenticable envelopes that have been opened without authorization or show signs of attempts to open or penetrate</li> </ul>								
<ul> <li>Indications of physical or logical access attempts to the processing system by unauthorized individuals or entities</li> </ul>								
<ul> <li>Failure to document that a secret or private key has been managed using the principles of dual control and split knowledge from its date of creation</li> </ul>								
<b>22-2</b> If attempts to load a secret key or key component into an KLD or POI fail, the same key loaded into a replacement device unless it can be ensured that all residue of the key or comp from or otherwise destroyed in the original KLD or POI.								
<b>22-2</b> Interview responsible personnel and observe implemented processes to verify that if attempts to load a secret key or key component into a KLD or POI fail, the same key or component is not loaded into a replacement device unless it can be ensured that all residue of the key or component has been erased from or otherwise destroyed in the original KLD or POI.	<report findings="" here=""></report>					<u>.</u>		



	Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Sum		f Assessment Findings (check one)			
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
Requirement 23:	Keys generated using reversible key-calculation methods, such as Keys generated using reversible key-calculation methods must not	be used at different levels c	of the key	hierarchy	. For exa	ample, a v	-	
	of a key-encryption key used for key exchange must not be used as a working key or as a Master File Key for local storage. Keys generated using a non-reversible process, such as key-derivation or transformation process with a base key using an enc process, are not subject to these requirements.							
same manner as the key may be used for reversible transform <b>Note:</b> Exposure of k exposure of all keys	ated with a reversible process (such as a variant of a key) of another key e original key—that is, under the principles of dual control and split know different purposes but must not be used at different levels of the key his ations must not generate key-encipherment keys from PIN keys. reys that are created using reversible transforms of another (key-genera that have been generated under that key-generation key. To limit this ri- key variants, the reversible transforms of a key must be secured in the s	ledge. Variants of the same erarchy. For example, tion) key can result in the sk posed by reversible key						
	umented procedures and interview responsible personnel to determine nerated using reversible key-calculation methods.		1				<u> </u>	
-	cesses to verify that any key generated using a reversible process of cted under the principles of dual control and split knowledge.							
must not be used ex used by host proces as key conveyance I A logical configuration	by host processing systems for encipherment of keys for local storage- ternal to the (logical) configuration that houses the MFK itself. For exam sing systems for encipherment of keys for local storage shall not be use between platforms that are not part of the same logical configuration. In is defined as one where all the components form a system used to ur	ple, MFKs and their variants d for other purposes, such						
•	nd controlled under a single operational and security policy.	<report findings="" here=""></report>						
variants. <i>Note:</i> Some HSMs i	may automatically generate variants or control vectors for specific to the entity to specify exact usage.							
23-2.b Examine ven	dor documentation to determine support for key variants.	<report findings="" here=""></report>						



Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
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<b>23-2.c</b> Via examination of the network schematic detailing transaction flows with the associated key usage and identification of the sources of the keys used, determine that variants of the MFK are not used external to the logical configuration that houses the MFK.	<report findings="" here=""></report>		·					
<b>23-3</b> Reversible key transformations are not used across different levels of the key hierarchy transformations must not generate working keys (e.g., PEKs) from key-encrypting keys. Such transformations are only used to generate different types of key-encrypting keys from a								
or working keys with different purposes from another working key. <b>Note:</b> Using transformations of keys across different levels of a key hierarchy—for example, key-encrypting key—increases the risk of exposure of each of those keys.	generating a PEK from a							
It is acceptable to use one "working" key to generate multiple reversible transforms to be use such as a PIN key, MAC key(s), and data key(s) (where a different reversible transform is us different working key). Similarly, it is acceptable to generate multiple key-encrypting keys fro key. However, it is not acceptable to generate working keys from key-encrypting keys.	sed to generate each							
<b>23-3</b> Examine documented key-transformation procedures and observe implemented processes to verify that reversible key transformations are not used across different levels of the key hierarchy, as follows:	<report findings="" here=""></report>	1	1		1	1		
<ul> <li>Variants used as KEKs must only be calculated from other key-encrypting keys.</li> </ul>								
<ul> <li>Variants of working keys must only be calculated from other working keys.</li> </ul>								
Requirement 24: Secret and private keys and key components that are no longer us	ed or have been replaced m	lust be se	curely de	stroyed.				
24-1 Instances of secret or private keys, and their key components, that are no longer used of by a new key must be destroyed.	or that have been replaced							
<b>24-1.a</b> Verify documented procedures are in place for destroying secret or private keys and their components that are no longer used or that have been replaced by a new key.	<report findings="" here=""></report>	1			1	1		
<b>24-1.b</b> Identify a sample of keys and key components that are no longer used or have been replaced. For each item in the sample, interview responsible personnel and examine key-history logs and key-destruction logs to verify that all keys have been destroyed.	<report findings="" here=""></report>							
<b>24-1.c</b> Examine storage locations for the sample of destroyed keys to verify they are no longer kept.	<report findings="" here=""></report>							



Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<ul> <li>24-2 The procedures for destroying key components or shares that are no longer used or have been replaced by a new key must be documented and sufficient to ensure that no part of the key or component can be recovered. For written components, this must be accomplished by use of a cross-cut shredder, pulping, or burning. Strip-shredding is not sufficient.</li> <li>Note: Key destruction for keys installed in HSMs and POI devices is addressed in Requirement 31.</li> </ul>								
<b>24-2.a</b> Examine documented procedures for destroying keys and confirm they are sufficient to ensure that no part of the key or component can be recovered.	<report findings="" here=""></report>	1	1	1	1			
<b>24-2.b</b> Observe key-destruction processes to verify that no part of the key or component can be recovered.	<report findings="" here=""></report>							
<ul> <li>24-2.1 Keys on all other storage media types in all permissible forms—physically secured, electronic DB backups of cryptograms), or components—must be destroyed following the 9564 or ISO–11568.</li> <li>For example, keys (including components or shares) maintained on paper must be burned crosscut shredder.</li> </ul>	procedures outlined in ISO-							
<b>24-2.1.a</b> Examine documented procedures for destroying keys and confirm that keys on all other storage media types in all permissible forms—physically secured, enciphered, or components—must be destroyed following the procedures outlined in ISO–9564 or ISO–11568.	<report findings="" here=""></report>	1	1	1	1			
<b>24-2.1.b</b> Observe key-destruction processes to verify that keys on all other storage media types in all permissible forms—physically secured, enciphered, or components—are destroyed following the procedures outlined in ISO–9564 or ISO–11568.	<report findings="" here=""></report>							
<b>24-2.2</b> The key-destruction process must be observed by a third party other than the custor that key. I.e., the third party must not be a key custodian for any part of the key being dest. The third-party witness must sign an affidavit of destruction.								
<b>24-2.2.a</b> Observe the key-destruction process and verify that it is witnessed by a third party other than a key custodian for any component of that key.	<report findings="" here=""></report>							
<b>24-2.2.b</b> Inspect key-destruction logs and verify that a third-party, non-key-custodian witness signs an affidavit as a witness to the key destruction process.	<report findings="" here=""></report>							



Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
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<b>24-2.3</b> Key components for keys other than the HSM or KLD MFKs that have been succes as operational must also be destroyed, unless the HSM does not store the encrypted value the subordinate keys internal to the HSM. BDKs used in KLDs may also be stored as compreload the KLD.	es on a DB but only stores								
<b>24-2.3.a</b> Verify documented procedures exist for destroying key components of keys once the keys are successfully loaded and validated as operational.	<report findings="" here=""></report>								
<b>24-2.3.b</b> Observe key-conveyance/loading processes to verify that any key components are destroyed once the keys are successfully loaded and validated as operational.	<report findings="" here=""></report>								
Requirement 25:       Access to secret and private cryptographic keys and key material must be:         a.       Limited to a need-to-know basis so that the fewest number of key custodians are necessary to enable their effective use; and         b.       Protected such that no other person (not similarly entrusted with that component) can observe or otherwise obtain the component.									
<b>25-1</b> To reduce the opportunity for key compromise, limit the number of key custodians to the operational efficiency. For example:	e minimum required for								
<b>25-1</b> Interview key custodians and key-management supervisory personnel and observe implemented processes to verify the following:	<report findings="" here=""></report>								
<b>25-1.1</b> Designate key custodian(s) for each component, such that the fewest number (e.g., key custodians are assigned as necessary to enable effective key management. Key custo or contracted personnel.									
25-1.1 Examine key-custodian assignments for each component to verify that:	<report findings="" here=""></report>								
Key custodian(s) are designated for each component.									
<ul> <li>The fewest number of key custodians is assigned as necessary to enable effective key management.</li> </ul>									
Assigned key custodians are employees or contracted personnel.									
25-1.2 Document this designation by having each custodian and backup custodian sign a	key-custodian form.								
<b>25-1.2.a</b> Examine completed key-custodian forms to verify that key custodians sign the form,	<report findings="" here=""></report>								



Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
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<b>25-1.2.b</b> Examine completed key-custodian forms to verify that backup custodians sign the form.	<report findings="" here=""></report>			·				
25-1.3 Each key-custodian form provides the following:								
Specific authorization for the custodian								
<ul> <li>Identification of the custodian's responsibilities for safeguarding key components or other keying material entrusted to them</li> </ul>								
<ul> <li>Signature of the custodian acknowledging their responsibilities</li> </ul>								
An effective date for the custodian's access								
Signature of management authorizing the access								
25-1.3 Examine all key-custodian forms to verify that they include the following:	<report findings="" here=""></report>							
Specific authorization for the custodian								
<ul> <li>Identification of the custodian's responsibilities for safeguarding key components or other keying material entrusted to them</li> </ul>								
Signature of the custodian acknowledging their responsibilities								
An effective date for the custodian's access								
Signature of management authorizing the access								



Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>25-1.4</b> In order for key custodians to be free from undue influence in discharging their custodial duties, key custodians sufficient to form the necessary threshold to create a key must not directly report to the same individual except as noted below for organizations of insufficient size.									
For example, for a key managed as three components, at least two individuals report to di of-n scheme (which must use a recognized secret-sharing scheme such as Shamir), such to form the key, key custodians sufficient to form the threshold necessary to form the key i individual.	as three of five key shares								
The components collectively held by an individual and his or her direct reports shall not co not provide any information about the value of the key that is not derivable from a single co	• •								
Custodians must not become a custodian for a component/share of a key where the custo is currently a custodian for another component/share of that key if that would collectively c the actual key.									
When the overall organization is of insufficient size such that the reporting structure cannon procedural controls can be implemented.	t support this requirement,								
Organizations that are of insufficient size that they cannot support the reporting-structure r	equirement must:								
• Ensure key custodians do not report to each other (i.e., the manager cannot also be a	i key custodian);								
Receive explicit training to instruct them from sharing key components with their direct	t manager;								
Sign key-custodian agreements that include an attestation to the requirement; and									
Receive training that includes procedures to report any violations.									
<b>25-1.4.a</b> Examine key-custodian assignments and organization charts to confirm the following:	<report findings="" here=""></report>		·			<u>.</u>			
<ul> <li>Key custodians that form the necessary threshold to create a key do not directly report to the same individual.</li> </ul>									
<ul> <li>Neither direct reports nor the direct reports in combination with their immediate supervisors possess the necessary threshold of key components sufficient to form any given key.</li> </ul>									
<ul> <li>Key custodians are not and have not been a custodian for another component/share of a key where that collectively would constitute a quorum to form the actual key.</li> </ul>									



Control Objective 6 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>25-1.4.b</b> For organizations that are such a small, modest size that they cannot support the reporting-structure requirement, ensure that documented procedures exist and are followed to:	<report findings="" here=""></report>							
Ensure key custodians do not report to each other.								
<ul> <li>Receive explicit training to instruct them from sharing key components with their direct manager.</li> </ul>								
Sign key-custodian agreement that includes an attestation to the requirement.								
Ensure training includes procedures to report any violations.								



Control Objective 6 PCI PIN Security Requirements		Reporting Details:	Summary of Assessment Findings (check one)						
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
Requirement 26:	Logs must be kept for any time that keys, key components, or rela	ted materials are removed fr	om stora	ge or load	ed to an	SCD.			
	kept whenever keys, key components, or related materials are removed These logs must be archived for a minimum of two years subsequent to h								
At a minimum, logs i	must include the following:								
<ul> <li>Date and time in</li> </ul>	n/out								
<ul> <li>Key-component</li> </ul>	tidentifier								
Purpose of acce	ess								
Name and signation	ature of custodian accessing the component								
<ul> <li>Name and signation</li> </ul>	ature of a non-custodian (for that component/share) witness								
<ul> <li>Tamper-evident</li> </ul>	and authenticable package number (if applicable)								
	files and audit log settings to verify that logs are kept for any time that nts, or related materials are:	<report findings="" here=""></report>		1		1			
Removed from	secure storage								
<ul> <li>Loaded to an So</li> </ul>	CD								
26-1.b Examine log	files and audit log settings to verify that logs include the following:	<report findings="" here=""></report>							
<ul> <li>Date and time in</li> </ul>	n/out								
<ul> <li>Key-component</li> </ul>	tidentifier								
<ul> <li>Purpose of acce</li> </ul>	ess								
<ul> <li>Name and signation</li> </ul>	ature of custodian accessing the component								
<ul> <li>Name and signation</li> </ul>	ature of a non-custodian (for that component/share) witness								
<ul> <li>Tamper-evident</li> </ul>	and authenticable package number (if applicable)								
Requirement 27:	Backups of secret and private keys must exist only for the purpose inaccessible. The backups must exist only in one of the allowed sto		accidenta	ally destro	yed or ar	e otherwi	se		
	Note: It is not a requirement to have backup copies of key compor	ents or keys.							
	es of secret and/or private keys exist, they must be maintained in accordation followed for the primary keys.	ance with the same							



Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>27-1</b> Interview responsible personnel and examine documented procedures and backup records to determine whether any backup copies of keys or their components exist. Perform the following:	<report findings="" here=""></report>		-			-		
<ul> <li>Observe backup processes to verify backup copies of secret and/or private keys are maintained in accordance with the same requirements as are followed for the primary keys.</li> </ul>								
<ul> <li>Inspect backup storage locations and access controls or otherwise verify through examination of documented procedures and interviews of personnel that backups are maintained as follows:</li> </ul>								
<ul> <li>Securely stored with proper access controls</li> </ul>								
<ul> <li>Under at least dual control</li> </ul>								
<ul> <li>Subject to at least the same level of security control as operational keys as specified in this document</li> </ul>								
27-2 If backup copies are created, the following must be in place:	·							
<ul> <li>Creation (including cloning) of top-level keys, e.g., MFKs, must require a minimum of tw enable the process.</li> </ul>	o authorized individuals to							
All requirements applicable for the original keys also apply to any backup copies of keys	and their components.							
<b>27-2</b> Interview responsible personnel and observe backup processes to verify the following:	<report findings="" here=""></report>							
<ul> <li>The creation of any backup copies for top-level keys requires at least two authorized individuals to enable the process.</li> </ul>								
<ul> <li>All requirements applicable for the original keys also apply to any backup copies of keys and their components.</li> </ul>								



Control Objective 6 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
Requirement 28: Documented procedures must exist and must be demonstrably in u	ise for all key-administration	operatio	ns.					
<b>28-1</b> Written procedures must exist, and all affected parties must be aware of those procedu key administration must be documented. This includes all aspects of key administration, as v	vell as:							
<ul> <li>Training of all key custodians regarding their responsibilities, and forming part of their ar</li> <li>Role definition—nominated individual with overall responsibility</li> </ul>	inual security training							
Background checks for personnel								
<ul> <li>Management of personnel changes, including revocation of access control and other pri move</li> </ul>	vileges when personnel							
<b>28-1.a</b> Examine documented procedures for key-administration operations to verify they include:	<report findings="" here=""></report>							
<ul> <li>Training of all key custodians regarding their responsibilities, and forming part of their annual security training</li> </ul>								
Role definition—nominated individual with overall responsibility								
Background checks for personnel								
<ul> <li>Management of personnel changes, including revocation of access control and other privileges when personnel move</li> </ul>								
<b>28-1.b</b> Interview personnel responsible for key-administration operations to verify that the documented procedures are known and understood.	<report findings="" here=""></report>							
<b>28-1.c</b> Interview personnel to verify that security-awareness training is provided for the appropriate personnel.	<report findings="" here=""></report>							
<b>28-1.d</b> Interview responsible HR personnel to verify that background checks are conducted (within the constraints of local laws).	<report findings="" here=""></report>							



Control Objective 7: Equipment used to process PINs and keys is managed in a secure manner.

Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Sum	n <b>ent Find</b> e)	Findings					
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 29:</b> PIN-processing equipment (e.g., POI devices and HSMs) must be placed into service only if there is assurance that the equipment has not been substituted or subjected to unauthorized modifications or tampering prior to the deployment of the device—both prior to and subsequent to the loading of cryptographic keys—and that precautions are taken to minimize the threat of compromise once deployed.									
service only if there	praphic devices—such as HSMs and POI devices (e.g., PEDs and ATMs is assurance that the equipment has not been subject to unauthorized r or is not otherwise been subject to misuse prior to deployment.								
<ul> <li>the following assura</li> <li>POIs have not be tampering.</li> <li>SCDs used for</li> </ul>	umented procedures to confirm that processes are defined to provide nces prior to the loading of cryptographic keys: been substituted or subjected to unauthorized modifications or key injection/loading or code signing have not been substituted or authorized modifications or tampering.	<report findings="" here=""></report>							
<ul> <li>to provide the follow</li> <li>POIs have not tampering.</li> <li>SCDs used for</li> </ul>	cesses and interview personnel to verify that processes are followed ing assurances prior to the loading of cryptographic keys: been substituted or subjected to unauthorized modifications or key injection/loading or code signing have not been substituted or authorized modifications or tampering.	<report findings="" here=""></report>							
	ust be protected against compromise. Any compromise must be detecter r the compromise must be prevented. ude the following:	ed. Loading and use of any							
	ocumented procedures to verify controls are defined to protect POIs rom unauthorized access up to point of deployment.	<report findings="" here=""></report>							



Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>29-1.1.1</b> Access to all POIs and other SCDs is documented, defined, logged, and controlled such that unauthorized individuals cannot access, modify, or substitute any device without detection. The minimum log contents include date and time, object name/identifier, purpose, name of individual(s) involved, signature or electronic capture (e.g., badge) of individual involved, and if applicable, tamper-evident package number(s) and serial number(s) of device(s) involved. Electronic logging—e.g., using bar codes—is acceptable for device tracking.									
<b>29-1.1.1.a</b> Examine access-control documentation and device configurations to verify that access to all POIs and key-injection/loading devices is defined and documented.	<report findings="" here=""></report>								
<b>29-1.1.1.b</b> For a sample of POIs and other SCDs, observe authorized personnel accessing devices and examine access logs to verify that access to all POIs and other SCDs is logged.	<report findings="" here=""></report>								
<b>29-1.1.1.c</b> Examine implemented access controls to verify that unauthorized individuals cannot access, modify, or substitute any POI or other SCD.	<report findings="" here=""></report>								
<b>29-1.1.3</b> All personnel with access to POIs and other SCDs prior to deployment are do and authorized by management. A documented security policy must exist that requires personnel with authorized access to all secure cryptographic devices. This includes do with access to POIs and other SCDs as authorized by management. The list of authoriz least annually.	the specification of cumentation of all personnel								
<b>29-1.1.3.a</b> Examine documented authorizations for personnel with access to devices to verify that prior to deployment:	<report findings="" here=""></report>	<u> </u>	I						
<ul> <li>All personnel with access to POIs and other SCDs are authorized by management in an auditable manner.</li> </ul>									
The authorizations are reviewed annually.									
<b>29-1.1.3.b</b> For a sample of POIs and other SCDs, examine implemented access controls to verify that only personnel documented and authorized in an auditable manner have access to devices.	<report findings="" here=""></report>								
<b>29-1.2</b> POIs and other SCDs must not use default keys or data (such as keys that are prepurposes) or passwords/authentication codes.	e-installed for testing								
<b>29-1.2.a</b> Examine vendor documentation or other information sources to identify default keys (such as keys that are pre-installed for testing purposes), passwords, or data.	<report findings="" here=""></report>								



Control Objective 7 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>29-1.2.b</b> Observe implemented processes and interview personnel to verify that default keys or passwords are not used.	<report findings="" here=""></report>							
<b>29-2</b> Implement a documented "chain of custody" to ensure that all devices are controlled fr into service.	om receipt to placement							
The chain of custody must include records to identify responsible personnel for each interact	ction with the devices.							
<b>Note:</b> Chain of custody includes procedures, as stated in Requirement 29-1, that ensure the and other SCDs is documented, defined, logged, and controlled such that unauthorized indemodify, or substitute any device without detection.								
<b>29-2.a</b> Examine documented processes to verify that the chain of custody is required for devices from receipt to placement into service.	<report findings="" here=""></report>	· · ·						
<b>29-2.b</b> For a sample of devices, examine documented records and interview responsible personnel to verify the chain of custody is maintained from receipt to placement into service.	<report findings="" here=""></report>							
<b>29-2.c</b> Verify that the chain-of-custody records identify responsible personnel for each interaction with the device.	<report findings="" here=""></report>							



Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Sum		Assessm check one	ent Find	ings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>29-3</b> Implement physical protection of devices from the manufacturer's facility up to the poin deployment, through one or more of the following:	t of key-insertion and					
<ul> <li>Transportation using a trusted courier service (for example, via bonded carrier). The de stored until key-insertion and deployment occurs.</li> </ul>	vices are then securely					
<ul> <li>Use of physically secure and trackable packaging (for example, pre-serialized, counterf evident packaging). The devices are then stored in such packaging, or in secure storag deployment occurs.</li> </ul>						
<ul> <li>A secret, device-unique "transport-protection token" is loaded into the secure storage as manufacturer's facility. The SCD used for key-insertion verifies the presence of the corr token" before overwriting this value with the initial key, and the device is further protected</li> </ul>	ect "transport-protection					
<ul> <li>Shipped and stored containing a secret that:</li> </ul>						
<ul> <li>Is immediately and automatically erased if any physical or functional alteration to t</li> </ul>	he device is attempted, and					
<ul> <li>Can be verified by the initial key-loading facility, but that cannot feasibly be determ personnel.</li> </ul>	nined by unauthorized					
<ul> <li>Each cryptographic device is carefully inspected and tested immediately prior to key-ins using due diligence. This is done to provide reasonable assurance that it is the legitima been subject to any unauthorized access or modifications.</li> </ul>						
Note: Unauthorized access includes that by customs officials.						
<ul> <li>Devices incorporate self-tests to ensure their correct operation. Devices must not is assurance they have not been tampered with or compromised.</li> </ul>	be re-installed unless there					
Note: This control must be used in conjunction with one of the other methods.						
<ul> <li>Controls exist and are in use to ensure that all physical and logical controls and ar used are not modified or removed.</li> </ul>	nti-tamper mechanisms					
<b>29-3.a</b> Examine documented procedures to confirm that they require physical protection of devices from the manufacturer's facility up to the point of key-insertion and deployment, through one or more of the defined methods.	<report findings="" here=""></report>					
<b>29-3.b</b> Interview responsible personnel to verify that one or more of the defined methods are in place to provide physical device protection for devices, from the manufacturer's facility up to the point of key-insertion and deployment.	<report findings="" here=""></report>					



Control Objective 7 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>29-4</b> Dual-control mechanisms must exist to prevent substitution or tampering of HSMs—bo back-up devices—throughout their life cycle. Procedural controls, which may be a combinat logical controls, may exist to support the prevention and detection of substituted HSMs but in implementation of dual-control mechanisms.	ion of physical barriers and							
<b>29-4.a</b> Examine documented procedures to confirm that dual-control mechanisms exist to prevent substitution or tampering of HSMs—both deployed and spare or back-up devices—throughout their life cycle.	<report findings="" here=""></report>							
<b>29-4.b</b> Interview responsible personnel and physically verify the dual-control mechanism used to prevent substitution or tampering of HSMs—both in service and spare or back-up devices—throughout their life cycle.	<report findings="" here=""></report>							
<b>29-4.1</b> HSM serial numbers must be compared to the serial numbers documented by the different communication channel from the device) to ensure device substitution has not or serial-number verification must be maintained.								
<b>Note:</b> Documents used for this process must be received via a different communication c document used must not have arrived with the equipment. An example of how serial num by the sender includes but is not limited to the manufacturer's invoice or similar document.	bers may be documented							
<b>29-4.1.a</b> Interview responsible personnel to verify that device serial numbers are compared to the serial number documented by the sender.	<report findings="" here=""></report>	·			-			
<b>29-4.1.b</b> For a sample of received devices, examine sender documentation sent via a different communication channel than the device's shipment (for example, the manufacturer's invoice or similar documentation) used to verify device serial numbers. Examine the record of serial-number validations to confirm the serial number for the received device was verified to match that documented by the sender.	<report findings="" here=""></report>							



Control Objective 7 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>29-4.2</b> The security policy enforced by the HSM must not allow unauthorized or unnecess functionality and commands that are not required to support specified functionality must be equipment is commissioned.	•							
<ul> <li>For example, for HSMs used in transaction processing operations:</li> <li>PIN-block format translation functionality is in accordance with Requirement 3, or non-not be supported without a defined documented and approved business need.</li> </ul>	ISO PIN-block formats must							
<ul> <li>HSMs used for acquiring functions shall not be configured to output clear-text PINs or functionality.</li> </ul>	support PIN-change							
Documentation (e.g., a checklist or similar suitable to use as a log) of configuration setting and dated by personnel responsible for the implementation. This documentation must inc for the HSM, such as serial number and/or asset identifiers. This documentation must be each affected HSM any time changes to configuration settings would impact security.	lude identifying information							
29-4.2.a Obtain and examine the defined security policy to be enforced by the HSM.	<report findings="" here=""></report>	1	1					
<b>29-4.2.b</b> Examine documentation of the HSM configuration settings from past commissioning events to determine that the functions and commands enabled are in accordance with the security policy.	<report findings="" here=""></report>							
<b>29-4.2.c</b> For a sample of HSMs, examine the configuration settings to determine that only authorized functions are enabled.	<report findings="" here=""></report>							
<b>29-4.2.d</b> Verify that PIN-change functionality, PIN-block format translation functionality, or non-ISO PIN-block formats are not supported without a defined documented and approved business need.	<report findings="" here=""></report>							
29-4.2.e Verify that functionality is not enabled to allow the outputting of clear-text PINs.	<report findings="" here=""></report>							



Control Objective 7 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
29-4.2.f Examine documentation to verify:	<report findings="" here=""></report>					·		
<ul> <li>Configuration settings are defined, signed, and dated by personnel responsible for implementation.</li> </ul>								
<ul> <li>It includes identifying information for the HSM, such as serial number and/or asset identifier.</li> </ul>								
<ul> <li>The documentation is retained and updated anytime configuration settings impacting security occur for each affected HSM.</li> </ul>								
<b>29-4.3</b> When HSMs are connected to online systems, controls are in place to prevent the use of an HSM to perform privileged or sensitive functions that are not available during routine HSM operations.								
Examples of sensitive functions include but are not limited to: loading of key components, components, and altering HSM configuration.	outputting clear-text key							
<b>29-4.3</b> Examine HSM configurations and observe processes to verify that HSMs are not enabled in a sensitive state when connected to online systems.	<report findings="" here=""></report>							
<b>29-4.4</b> Inspect and test all HSMs—either new or retrieved from secure storage—prior to in have not been tampered with or compromised.	nstallation to verify devices							
Processes must include:								
<b>29-4.4</b> Examine documented procedures to verify they require inspection and testing of HSMs prior to installation to verify integrity of device.	<report findings="" here=""></report>							
29-4.4.1 Running self-tests to ensure the correct operation of the device	I							
<b>29-4.4.1</b> Examine records of device inspections and test results to verify that self- tests are run on devices to ensure the correct operation of the device.	<report findings="" here=""></report>							
<b>29-4.4.2</b> Installing (or re-installing) devices only after confirming that the device has not compromised	been tampered with or							
<b>29-4.4.2</b> Observe inspection processes and interview responsible personnel to verify that devices are installed, or reinstalled, only after confirming that the device has not been tampered with or compromised.	<report findings="" here=""></report>				-			
<b>29-4.4.3</b> Physical and/or functional tests and visual inspection to confirm that physical a tamper mechanisms are not modified or removed	and logical controls and anti-							



Control Objective 7 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)							
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>29-4.4.3</b> Observe inspection processes and interview responsible personnel to confirm processes include physical and/or functional tests and visual inspection to verify that physical and logical controls and anti-tamper mechanisms are not modified or removed.	<report findings="" here=""></report>		1	1					
29-4.4.4 Maintaining records of the tests and inspections, and retaining records for at I	east one year								
<b>29-4.4.4.a</b> Examine records of inspections and interview responsible personnel to verify records of the tests and inspections are maintained.	<report findings="" here=""></report>	1	1	1	1				
<b>29-4.4.b</b> Examine records of inspections to verify records are retained for at least one year.	<report findings="" here=""></report>								
29-5 Maintain HSMs in tamper-evident packaging or in secure storage until ready for instal	lation.								
<b>29-5.a</b> Examine documented procedures to verify they require devices be maintained in tamper-evident packaging until ready for installation.	<report findings="" here=""></report>	1	1	1	1				
<b>29-5.b</b> Observe a sample of received devices to verify they are maintained in tamper- evident packaging until ready for installation.	<report findings="" here=""></report>								
Requirement 30: Physical and logical protections must exist for deployed POI device	ces								
<b>30-1</b> POI devices must be secured throughout the device lifecycle. The responsible entity r	nust:								
Maintain inventory-control and monitoring procedures to accurately track POI devices	in their possession.								
<ul> <li>Physically secure POI devices awaiting deployment or otherwise not in use.</li> </ul>									
<ul> <li>Implement procedures to prevent and detect the unauthorized alteration or replacement possession during deployment.</li> </ul>	nt of POI devices in								
<ul> <li>Ensure that POI devices are physically secured or otherwise controlled to prevent una modification, or substitution while devices are deployed for use. This includes both atte devices (for example, kiosks, "pay-at-the-pump," etc.).</li> </ul>									
Prevent unauthorized physical access to devices undergoing repair or maintenance whether the second se	nile in their possession.								



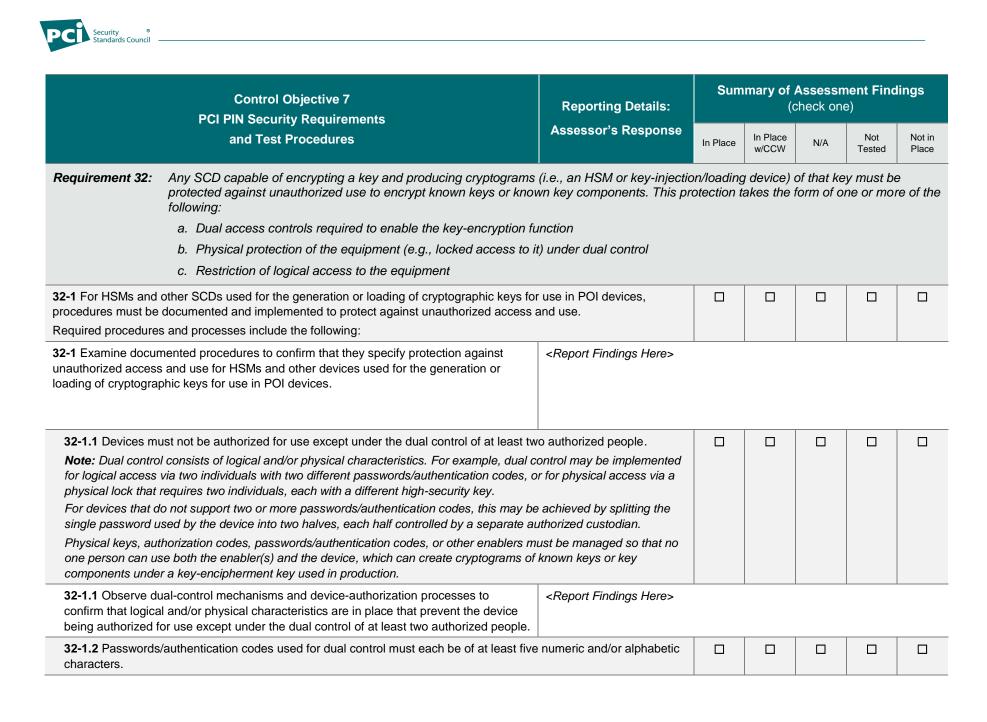
Control Objective 7 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>30-1.a</b> Obtain and examine documentation of inventory control and monitoring procedures. Determine that the procedures cover:	<report findings="" here=""></report>							
Inventory-control and monitoring procedures to track POI devices in their possession.								
<ul> <li>Physically securing POI devices when awaiting deployment or otherwise not in use.</li> </ul>								
<ul> <li>The prevention and detection of the unauthorized alteration or replacement of POI devices during deployment.</li> </ul>								
<ul> <li>Ensuring that POI devices are physically secured or otherwise controlled to prevent unauthorized access, modification, or substitution while devices are deployed for use, including both attended and unattended devices (for example, kiosks, "pay-at-the- pump," etc.).</li> </ul>								
<ul> <li>Preventing unauthorized physical access to devices undergoing repair or maintenance while in their possession.</li> </ul>								
<b>30-1.b</b> Interview applicable personnel to determine that procedures are known and followed.	<report findings="" here=""></report>							
30-2 Secure device-management processes must be implemented. The responsible er	ntity must:							
<ul> <li>Securely maintain POI devices being returned, replaced, or disposed of, and provide re party providers performing this service.</li> </ul>	elated instructions to third-							
Protect POI devices from known vulnerabilities and implement procedures for secure u	pdates to devices.							
<ul> <li>Provide auditable logs of any changes to critical functions of the POI device(s).</li> </ul>								
<ul> <li>Define and implement procedures for merchants on detecting and reporting tampered I missing devices.</li> </ul>	POI devices, including							
<ul> <li>Implement mechanisms to monitor and respond to suspicious activity on POI devices of locations.</li> </ul>	leployed at merchant							



PCI PIN Security Requirements	Reporting Details:	Sum		Assessn check one	nent Find e)	ings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>30-2</b> Obtain and examine documentation of POI device-management processes. Determine that procedures cover:	<report findings="" here=""></report>					
<ul> <li>Securely maintaining devices being returned, replaced, or disposed of, along with related instructions to third-party providers performing this service.</li> </ul>						
<ul> <li>Protecting POI devices from known vulnerabilities and implementing procedures for secure updates to devices.</li> </ul>						
• Providing for auditable logs of any changes to critical functions of the POI device(s).						
<ul> <li>Defined, implemented procedures for merchants on detecting and reporting tampered POI devices, including missing devices.</li> </ul>						
<ul> <li>Implementing mechanisms to monitor and respond to suspicious activity on POI devices deployed at merchant locations.</li> </ul>						
<b>Requirement 31:</b> Procedures must be in place and implemented to protect any SCL material within such devices—when removed from service, retired						
<b>31-1</b> Procedures are in place to ensure that any SCDs to be removed from service—e.g., re repair—are not intercepted or used in an unauthorized manner, including rendering all secrematerial stored within the device irrecoverable.						
Processes must include the following:						
<b>Note:</b> Without proactive key-removal processes, devices removed from service can retain of battery-backed RAM for days or weeks. Likewise, host/hardware security modules (HSMs) more critically, the Master File Key—resident within these devices. Proactive key-removal p to delete all such keys from any SCD being removed from the network.	can also retain keys—and					
<b>31-1</b> Verify that documented procedures for removing SCDs from service include the following:	<report findings="" here=""></report>	1	1			
<ul> <li>Procedures require that all secret and private keys and key material stored within the device be securely destroyed.</li> </ul>						
Procedures cover all devices removed from service or for repair.						
<b>31-1.1</b> HSMs require dual control (e.g., to invoke the system menu) to implement for all control processes.	ritical decommissioning					
<b>31-1.1.a</b> Examine documented procedures for removing HSM from service to verify that dual control is implemented for all critical decommissioning processes.	<report findings="" here=""></report>					



Control Objective 7 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>31-1.1.b</b> Interview personnel and observe demonstration (if HSM is available) of processes for removing HSMs from service to verify that dual control is implemented for all critical decommissioning processes.	<report findings="" here=""></report>							
<b>31-1.2</b> Key are rendered irrecoverable (for example, zeroized) for SCDs. If data cannot be devices must be physically destroyed under dual control to prevent the disclosure of any								
<b>31-1.2</b> Interview personnel and observe demonstration of processes for removing SCDs from service to verify that all keying material is rendered irrecoverable (for example, zeroized), or that devices are physically destroyed under dual-control to prevent the disclosure of any sensitive data or keys.	<report findings="" here=""></report>							
31-1.3 SCDs being decommissioned are tested and inspected to ensure keys have been	rendered irrecoverable.							
<b>31-1.3</b> Interview personnel and observe processes for removing SCDs from service to verify that tests and inspections of devices are performed to confirm that keys have been rendered irrecoverable or the devices are physically destroyed.	<report findings="" here=""></report>							
31-1.4 Affected entities are notified before devices are returned.								
<b>31-1.4</b> Interview responsible personnel and examine device-return records to verify that affected entities are notified before devices are returned.	<report findings="" here=""></report>	1	1	1	1	1		
<b>31-1.5</b> Devices are tracked during the return process.								
<b>31-1.5</b> Interview responsible personnel and examine device-return records to verify that devices are tracked during the return process.	<report findings="" here=""></report>	1	1	1	1	1		
31-1.6 Records of the tests and inspections are maintained for at least one year.								
<b>31-1.6</b> Interview personnel and observe records to verify that records of the tests and inspections are maintained for at least one year.	<report findings="" here=""></report>		<u> </u>	<u> </u>		<u> </u>		





Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>32-1.2</b> Observe password policies and configuration settings to confirm that passwords/authentication codes used for dual control must be at least five numeric and/or alphabetic characters	<report findings="" here=""></report>							
32-1.3 Dual control must be implemented for the following:								
<ul> <li>To enable any manual key-encryption functions and any key-encryption functions that occur outside of normal transaction processing;</li> </ul>								
To place the device into a state that allows for the input or output of clear-text key components;								
For all access to key-loading devices (KLDs).								
<b>32-1.3</b> Examine dual-control mechanisms and observe authorized personnel performing the defined activities to confirm that dual control is implemented for the following:	<report findings="" here=""></report>							
<ul> <li>To enable any manual key-encryption functions, and any key-encryption functions that occur outside of normal transaction processing;</li> </ul>								
<ul> <li>To place the device into a state that allows for the input or output of clear-text key components;</li> </ul>								
For all access to KLDs.								
32-1.4 Devices must not use default passwords/authentication codes.								
<b>32-1.4.a</b> Examine password policies and documented procedures to confirm default passwords/authentication codes must not be used for HSMs, KLDs, and other SCDs used to generate or load cryptographic keys.	<report findings="" here=""></report>	·	·					
<b>32-1.4.b</b> Observe device configurations and interview device administrators to verify that HSMs, KLDs, and other SCDs used to generate or load cryptographic keys do not use default passwords/authentication codes.	<report findings="" here=""></report>							
32-1.5 To detect any unauthorized use, devices are at all times within a secure room and	either:							
<ul> <li>Locked in a secure cabinet and/or sealed in tamper-evident packaging, or</li> </ul>								
<ul> <li>Under the continuous supervision of at least two authorized people who ensure that a device would be detected.</li> </ul>	any unauthorized use of the							



Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>32-1.5.a</b> Examine documented procedures to confirm that they require devices are either:	<report findings="" here=""></report>							
<ul> <li>Locked in a secure cabinet and/or sealed in tamper-evident packaging at all times, or</li> </ul>								
Under the continuous supervision of at least two authorized people at all times.								
<b>32-1.5.b</b> Interview responsible personnel and observe devices and processes to confirm that devices are either:	<report findings="" here=""></report>							
<ul> <li>Locked in a secure cabinet and/or sealed in tamper-evident packaging at all times, or</li> </ul>								
Under the continuous supervision of at least two authorized people at all times.								
<b>Requirement 33:</b> Documented procedures must exist and be demonstrably in use to POI devices supporting PIN and HSMs) placed into service, initial				essing eq	uipment	(e.g.,		
<b>33-1</b> Written procedures must exist, and all affected parties must be aware of those procedures maintained of the tests and inspections performed on PIN-processing devices before they a well as devices being decommissioned.								
<b>33-1.a</b> Examine documented procedures/processes and interview responsible personnel to verify that all affected parties are aware of required processes and are provided suitable guidance on procedures for devices placed into service, initialized, deployed, used, and decommissioned.	<report findings="" here=""></report>							
<b>33-1.b</b> Verify that written records exist for the tests and inspections performed on PIN- processing devices before they are placed into service, as well as devices being decommissioned.	<report findings="" here=""></report>							



# Normative Annex A – Symmetric Key Distribution using Asymmetric Techniques

This normative annex contains detailed requirements that apply to remote key-establishment and distribution applications for POI devices and is in addition to key- and equipment-management criteria stated in the main body of the *PCI PIN Security Requirements*. Remote key-distribution schemes should be used for initial key loading only—i.e., establishment of the TDEA key hierarchy, such as a terminal master key. Standard symmetric key-exchange mechanisms should be used for subsequent TMK, PEK, or other symmetric key exchanges, except where a device requires a new key-initialization due to unforeseen loss of the existing TMK.

These requirements pertain to two distinct areas covered separately in the two parts of this Annex.

### A1 – Remote Key-Distribution Using Asymmetric Techniques Operations

Characteristics of the actual key-distribution methodology implemented. These requirements apply to all entities implementing remote key distribution using asymmetric techniques for the distribution of acquirer keys to transaction-originating devices (POIs) for use in connection with PIN encryption, whether the actual distribution of acquirer keys occurs from the transaction-processing host or is distributed directly by the vendor.

• ANSI TR-34 presents a methodology that is compliant with these requirements.

#### A2 – Certification and Registration Authority Operations

Operations of Certification and Registration Authority platforms used in connection with remote key-distribution implementations. These requirements apply only to the entities operating Certification and/or Registration Authorities.

- Certification Authority requirements apply to all entities (acquirers, manufacturers, and other third parties) signing public keys to be used for remote distribution of cryptographic keys, whether in X.509 certificate-based schemes or other designs, to allow for the required authentication of these signed public keys. For purposes of these requirements, a certificate is any digitally signed value containing a public key, where the term "digitally signed" refers to a cryptographic method used that enforces the integrity and authenticity of a block of data through the cryptographic processing of that block of data with a private key. The CA requirements apply only to methods that allow for the distribution and use of such signed public keys to multiple systems, and as such do not apply to systems that apply symmetric cryptography to keys for authentication (such as through the use of MACs).
- The Certification Authority requirements are not intended to be applied to devices that sign their own keys, nor to key-loading systems where the key loading is not performed remotely, and authentication is provided by another method—such as properly implemented dual control and key-loading device(s)—even if these systems involve the use of certificates.

If the key loading is not performed remotely and authentication is provided by another method—such as properly implemented dual control using keyloading device(s)—even if these systems involve the use of certificates, Annex A does not apply. Remotely means whenever the key loading device and the POI device are not co-located and connected via a direct mechanism, such as a cable.

The control objectives and security requirements are delineated as found in the preceding "PIN Security Requirement – Technical Reference" section of this document and are in addition to requirements for those entities performing transaction processing.

Unless otherwise specified, the term Certification Authority (CA) refers to any CA in the hierarchy, Root or SubCa.



# A1 – Remote Key Distribution Using Asymmetric Techniques Operations

# Control Objective 1: PINs used in transactions governed by these requirements are processed using equipment and methodologies that ensure they are kept secure.

Annex A1, Control Objective 1 PCI PIN Security Requirements and Test Procedures	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
No additional security requirements added for "Symmetric Key Distribution using Asymmetric Techniques."								

Control Objective 2: Cryptographic keys used for PIN encryption/decryption and related key management are created using processes that ensure that it is not possible to predict any key or determine that certain keys are more probable than other keys.

Annex A1, Control Objective 2 PCI PIN Security Requirements and Test Procedures	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
No additional security requirements added for "Symmetric Key Distribution using Asymmetric Techniques."								



# Control Objective 3: Keys are conveyed or transmitted in a secure manner.

Annex A1, Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
Requirement 10: All key-encryption keys used to transmit or convey other cryptographic keys must be at least as strong as any key transmitted or conveyed.									
<b>10-2</b> All key-encryption keys used to transmit or convey other cryptographic keys must be at least as strong as any key transmitted or conveyed except as noted in Requirement 10-1.									
<b>10-2</b> Examine documented procedures to verify that all keys used to transmit or convey other cryptographic keys must be at least as strong as any key transmitted or conveyed except as noted in Requirement 10-1.	<report findings="" here=""></report>								
10-3 Key sizes and algorithms must be in accordance with Annex C except as noted in Re	quirement 10-1.								
<b>10-3</b> Observe key-generation processes to verify that all keys used to transmit or convey other cryptographic keys are at least as strong as any key transmitted or conveyed except as noted in Requirement 10-1.	<report findings="" here=""></report>								



Control Objective 4: Key-loading to HSMs and POI PIN-acceptance devices is handled in a secure manner.

Annex A1, Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 15:</b> The loading of keys or key components must incorporate a validation can be ascertained that they have not been tampered with, subst		e autheni	ticity of th	e keys is	ensured,	, and it		
<b>15-3</b> Mechanisms must exist to prevent a non-authorized KDH from performing key transport, key exchange, or key establishment with POIs. POIs and key-distribution hosts (KDHs) using public-key schemes must validate authentication credentials of other such devices involved in the communication immediately prior to any key transport, exchange, or establishment.								
Mutual authentication of the sending and receiving devices must be performed. <b>Note:</b> Examples of this kind of validation include ensuring the SCD serial number is listed a devices, checking current certificate revocation lists or embedding valid authorized KDH ce disallowing communication with unauthorized KDHs, as delineated by techniques defined in PCI PTS POI Security Requirements.								
<b>15-3.a</b> Examine documented procedures to confirm they define procedures for mutual authentication of the sending and receiving devices, as follows:	<report findings="" here=""></report>	1			1	1		
<ul> <li>POI devices must validate authentication credentials of KDHs prior to any key transport, exchange, or establishment with that device.</li> </ul>								
<ul> <li>KDHs must validate authentication credentials of POIs prior to any key transport, exchange, or establishment with that device.</li> </ul>								
<b>15-3.b</b> Interview applicable personnel to verify that mutual authentication of the sending and receiving devices is performed, as follows:	<report findings="" here=""></report>							
<ul> <li>POI devices validate authentication credentials of KDHs immediately prior to any key transport, exchange, or establishment with that device.</li> </ul>								
<ul> <li>KDHs validate authentication credentials of POIs immediately prior to any key transport, exchange, or establishment with that device.</li> </ul>								
15-4 Key-establishment and distribution procedures must be designed such that:								
<ul> <li>Within an implementation design, there shall be no means available for "man-in-the-m through binding of the KDH certificate upon the initial communication.</li> </ul>	iddle" attacks—e.g.,							
• System implementations must be designed and implemented to prevent replay attacks random nonces and time stamps as noted in <i>ANSI TR-34</i> .	s—e.g., through the use of							



Annex A1, Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>15-4</b> Examine system and process documentation to verify that key-establishment and distribution procedures are designed such that:	<report findings="" here=""></report>							
<ul> <li>There are no means available in the implementation design for "man-in-the-middle" attacks.</li> </ul>								
System implementations are designed to prevent replay attacks.								
<b>15-5</b> Key pairs generated external to the device that uses the key pair must be securely transferred and loaded into the device and must provide for key protection in accordance with this document. That is, the secrecy of the private key and the integrity of the public key must be ensured. The process must ensure that once keys are injected they are no longer available for injection into other POI devices—i.e., key pairs are unique per POI device.								
<b>15-5</b> If key pairs are generated external to the device that uses the key pair, perform the following:	<report findings="" here=""></report>							
<ul> <li>Examine documented procedures to verify that controls are defined to ensure the secrecy of private keys and the integrity of public keys during key transfer and loading.</li> </ul>								
<ul> <li>Observe key transfer and loading operations to verify that the secrecy of private keys and the integrity of the public keys are ensured.</li> </ul>								
<ul> <li>Verify the process ensures that key pairs are unique per POI device.</li> </ul>								



Control Objective 5: Keys are used in a manner that prevents or detects their unauthorized usage.

Annex A1, Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 18:</b> Procedures must exist to prevent or detect the unauthorized substitution (unauthorized key replacement and key misuse) of one key for another or the operation of any cryptographic device without legitimate keys.								
<b>18-4</b> POIs shall only communicate with a Certification Authority (CA) for the purpose of certification where the certificate-issuing authority generates the key pair on behalf of the PO management, normal transaction processing, and certificate (entity) status checking.								
18-4.a Examine documented procedures to verify that:	<report findings="" here=""></report>							
<ul> <li>POIs only communicate with CAs for the purpose of certificate signing, or for key injection where the certificate-issuing authority generates the key pair on behalf of the device;</li> </ul>								
<ul> <li>POIs only communicate with KDHs for key management, normal transaction processing, and certificate (entity) status checking.</li> </ul>								
18-4.b Interview responsible personnel and observe POI configurations to verify that:	<report findings="" here=""></report>							
<ul> <li>POIs only communicate with CAs for the purpose of certificate signing, or for key- injection where the certificate issuing authority generates the key pair on behalf of the device;</li> </ul>								
<ul> <li>POIs only communicate with KDHs for key management, normal transaction processing, and certificate (entity) status checking.</li> </ul>								
<b>18-5</b> KDHs shall only communicate with POIs for the purpose of key management and no and with CAs for the purpose of certificate signing and certificate (entity) status checking.	rmal transaction processing,							
18-5.a Examine documented procedures to verify that:	<report findings="" here=""></report>							
<ul> <li>KDHs only communicate with POIs for the purpose of key management and normal transaction processing;</li> </ul>								
KDHs only to communicate with CAs for the purpose of certificate signing and certificate (entity) status checking.								



Annex A1, Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<ul> <li>18-5.b Interview responsible personnel and observe KDH configurations to verify that:</li> <li>KDHs only communicate with POIs for the purpose of key management and normal transaction processing;</li> <li>KDHs only communicate with CAs for the purpose of certificate signing and certificate (entity) status checking.</li> </ul>	<report findings="" here=""></report>							
Requirement 19: Cryptographic keys must be used only for their sole intended purp	oose and must never be share	ed betwee	en produc	tion and	test syste	ems.		
<b>19-6</b> Key pairs must not be reused for certificate renewal or replacement—i.e., new key pairs must be generated. Each key pair must result in only one certificate.								
<ul> <li>19-6.a Examine documented procedures for requesting certificate issue, renewal, and replacement to verify procedures include generation of a unique key pair for each: <ul> <li>New certificate issue request</li> <li>Certificate replacement request</li> <li>Each key pair generated results in only one certificate issuing and replacement processes to verify that: <ul> <li>Only one certificate is requested for each key pair generated.</li> <li>Certificates are replaced by generating a new key pair and requesting a new certificate.</li> <li>Each key pair generated results in only one certificate.</li> </ul> </li> </ul></li></ul>	<report findings="" here=""></report>							
19-7 KDH private keys must not be shared between devices except for load balancing and	disaster recovery.							
<b>19-10</b> Examine documented processes to verify that KDH private keys are not permitted to be shared between devices, except for load balancing and disaster recovery.	<report findings="" here=""></report>							
<b>19-8</b> POI private keys must not be shared between devices.								
<b>19-11.a</b> Examine documented processes to verify that POI private keys are not permitted to be shared between devices.	<report findings="" here=""></report>							



Annex A1, Control Objective 5 PCI PIN Security Requirements and Test Procedures	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>19-11.b</b> Inspect public key certificates on the host processing system to confirm that a unique certificate exists for each connected POI.	<report findings="" here=""></report>							



## Control Objective 6: Keys are administered in a secure manner.

	Annex A1, Control Objective 6 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Fir (check one)						
	and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 21:</b> Secret keys used for enciphering PIN-encryption keys or for PIN encryption, or private keys used in connection with remote key- distribution implementations, must never exist outside of SCDs, except when encrypted or securely stored and managed using the principles of dual control and split knowledge.									
<b>21-4</b> Private keys used to sign certificates, certificate status lists, messages, or for key protection must exist only in o or more of the following forms:									
Within a secure	cryptographic device that meets applicable PCI PTS requirements for	such a device,							
<ul> <li>Encrypted within</li> </ul>	n an SCD using an algorithm and key size of equivalent or greater stre	ngth, or							
<ul> <li>As key shares u control and spli</li> </ul>	using a recognized secret-sharing scheme (e.g., Shamir), that are at al t knowledge.	l times managed under dual							
used to sign certifica	umented key-management procedures to verify that private keys ates, certificate-status lists, messages, or for key protection must more of the approved forms at all times.	<report findings="" here=""></report>			·		·		
management sup	ey-management operations and interview key custodians and key- ervisory personnel to verify that private keys used to sign certificates, ists, messages, or for key protection must exist only in one or more orms at all times.	<report findings="" here=""></report>							



# A2 – Certification and Registration Authority Operations

Control Objective 3: Keys are conveyed or transmitted in a secure manner.

Annex A2, Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 10:</b> All key-encryption keys used to transmit or convey other cryptographic keys must be at least as strong as any key transmitted or conveyed.									
<b>10-4</b> All key-encryption keys used to transmit or convey other cryptographic keys must be at least as strong as any key transmitted or conveyed.									
<b>10-4</b> Examine documented procedures to verify that all keys used to transmit or convey other cryptographic keys must be at least as strong as any key transmitted or conveyed.									
<b>10-5</b> Key sizes and algorithms must be in accordance with Annex C.									
	ation processes to verify that all keys used to transmit or convey are at least as strong as any key transmitted or conveyed.	vey <report findings="" here=""></report>					<u> </u>		



Control Objective 4: Key-loading to HSMs and POI PIN-acceptance devices is handled in a secure manner.

Annex A2, Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Sum	mary of	Assessn check one		lings			
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>Requirement 15:</b> The loading of keys or key components must incorporate a validation mechanism such that the authenticity of the keys is ensured, and it can be ascertained that they have not been tampered with, substituted, or compromised.									
<b>15-5</b> Key pairs generated external to the device that uses the key pair must be securely tradevice and must provide for key protection in accordance with this document. That is, the sand the integrity of the public key must be ensured. The process must ensure that once key longer available for injection into other POI devices—i.e., key pairs are unique per POI devices.	secrecy of the private key ys are injected they are no								
<b>15-5</b> If key pairs are generated external to the device that uses the key pair, perform the following:	<report findings="" here=""></report>								
<ul> <li>Examine documented procedures to verify that controls are defined to ensure the secrecy of private keys and the integrity of public keys during key transfer and loading.</li> </ul>									
<ul> <li>Observe key transfer and loading operations to verify that the secrecy of private keys and the integrity of the public keys are ensured.</li> </ul>									
<ul> <li>Verify the process ensures that key pairs are unique per POI device.</li> </ul>									



## Control Objective 5: Keys are used in a manner that prevents or detects their unauthorized usage.

Annex A2, Control Objective 5 PCI PIN Security Requirements		Sum	nent Find e)	Findings		
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>Requirement 19:</b> Cryptographic keys must be used only for their sole intended purp	oose and must never be share	ed betwe	en produ	ction and	l test syst	ems
<b>19-5</b> If a business rationale exists, a production platform (HSMs and servers/standalone computers) may be temporarily used for test purposes. However, all keying material must be deleted from the HSM(s) and the CA and RA server/computer platforms prior to testing. Subsequent to completion of testing, all keying materials must be deleted, the server/computer platforms must be wiped and rebuilt from read-only media, and the relevant production keying material restored using the principles of dual control and split knowledge as stated in these requirements.						
At all times the HSMs and servers/computers must be physically and logically secured in ac requirements.	ccordance with these					
<b>19-5</b> Interview personnel to determine whether production platforms are ever temporarily used for test purposes.	<report findings="" here=""></report>					
If they are, verify that documented procedures require that:						
<ul> <li>All keying material must be deleted from the HSM(s) and the server/computer platforms prior to testing.</li> </ul>						
<ul> <li>Subsequent to completion of testing, all keying materials must be deleted, and the server/computer platforms must be wiped and rebuilt from read-only media.</li> </ul>						
<ul> <li>Prior to reuse for production purposes, the HSM is returned to factory state.</li> </ul>						
<ul> <li>The relevant production keying material is restored using the principles of dual control and split knowledge as stated in these requirements.</li> </ul>						
19-6 Key pairs must not be reused for certificate renewal or replacement—i.e., new key pairs	rs must be generated.					
Each key pair must result in only one certificate.						
<b>19-6.a</b> Examine documented procedures for requesting certificate issue, renewal, and replacement to verify procedures include generation of a unique key pair for each:	<report findings="" here=""></report>					
New certificate issue request						
Certificate replacement request						
Each key pair generated results in only one certificate						



Annex A2, Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>19-6.b</b> Interview responsible personnel, examine records of past KDH-signing requests, and observe certificate issuing and replacement processes to verify that:	<report findings="" here=""></report>		·					
<ul> <li>Only one certificate is requested for each key pair generated.</li> </ul>								
<ul> <li>Certificates are replaced by generating a new key pair and requesting a new certificate.</li> </ul>								
Each key pair generated results in only one certificate.								
<b>19-9</b> Mechanisms must be utilized to preclude the use of a key for other than its designated is, keys must be used in accordance with their certificate policy. See <i>RFC 3647- Internet X. Certificate Policy and Certification Practices Framework</i> for an example of content.								
<b>19-9.a</b> Examine key-usage documentation and ensure that the usage is in accordance with the certificate policy.	<report findings="" here=""></report>	·						
<b>19-9.b</b> Examine vendor documentation and device configuration settings to verify that the device mechanisms are implemented that preclude the use of a key for other than its designated and intended purpose.	<report findings="" here=""></report>							



Annex A2, Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>19-9.1</b> CA certificate signature keys, certificate (entity) status checking (for example, Certificate Revocation Lists) signature keys, or signature keys for updating valid/authorized host lists in encryption devices must not be used for any purpose other than subordinate entity certificate requests, certificate status checking, and self-signed root certificates.								
<b>Note:</b> The keys used for certificate signing and certificate (entity) status checking (and if a may be for combined usage or may exist as separate keys dedicated to either certificate-status checking.								
19-9.1.a Examine certificate policy and documented procedures to verify that:	<report findings="" here=""></report>							
Certificate signature keys,								
<ul> <li>Certificate status checking (for example, Certificate Revocation Lists) signature keys, or</li> </ul>								
<ul> <li>Signature keys for updating valid/authorized host lists in POIs</li> </ul>								
Are not used for any purpose other than:								
Subordinate entity certificate requests,								
Certificate status checking, and/or								
Self-signed root certificates.								
19-9.1.b Interview responsible personnel and observe demonstration to verify that:	<report findings="" here=""></report>							
Certificate signature keys,								
Status checking (for example, Certificate Revocation Lists) signature keys, or								
<ul> <li>Signature keys for updating valid/authorized host lists in POIs</li> </ul>								
Are not used for any purpose other than:								
Subordinate entity certificate requests,								
Certificate status checking, and/or								
Self-signed root certificates.								
<b>19-9.2</b> CAs that issue certificates to other CAs must not be used to issue certificates to POI certificates to both subordinate CAs and end-entity (POI) devices.	s—i.e., a CA cannot sign							



Annex A2, Control Objective 5 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>19-9.2</b> If a CA issues certificates to other CAs, examine the CA certificate policy and documented procedures to verify that the CA does not also issue certificates to POI devices.	<report findings="" here=""></report>							
<b>19-10</b> Public-key-based implementations must provide mechanisms for restricting and controlling the use of public and private keys. For example, this can be accomplished through the use of X.509 compliant certificate extensions.								
<b>19-10</b> Examine documented procedures to verify that mechanisms are defined for restricting and controlling the use of public and private keys such that they can only be used for their intended purpose.	<report findings="" here=""></report>							
<b>19-11</b> CA private keys must not be shared between devices except for load balancing and disaster recovery.								
<b>19-11</b> Examine CA's documented processes to verify that CA private keys are not permitted to be shared between devices, except for load balancing and disaster recovery.	<report findings="" here=""></report>	· · · · · · · · · · · · · · · · · · ·			,			



Annex A2, Control Objective 5 PCI PIN Security Requirements Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<ul> <li>19-12 Certificates used in conjunction with remote key-distribution functions must only be used for a single purpose.</li> <li>Certificates associated with encryption for remote key-distribution functions must not be used for any other purpose.</li> <li>Certificates associated with authentication of the KDH must not be used for any other purpose.</li> <li>Certificates associated with authentication of the POI must not be used for any other purpose.</li> <li>Certificates associated with authentication of POI firmware and POI applications must not be used for any other purpose.</li> </ul>							
<ul> <li>If CA separation is used to ensure certificate segmentation:</li> <li>Sub-CAs used to produce certificates used for remote key-delivery functions must not l certificates used for any other purpose.</li> <li>Sub-CAs used to produce certificates for POI firmware and POI application authenticat other purpose</li> <li>If policy-based certificate segmentation is used to achieve unique purpose certificates:</li> <li>The method of segmentation between certificates must be reflected in the certificate pr the CA.</li> <li>Certificates issued for remote key-distribution purposes must include a mechanism to it purpose.</li> <li>Each SCD using a certificate in a remote key-delivery function must ensure there is a certificate indicating that it is for use in the remote key-delivery function for which it is b</li> </ul>	ion must not be used for any actice statement (CPS) for dentify designation for this lesignation included in the						
<ul> <li>certificate in a remote key-delivery function must ensure that if there is a designation in indicates it is for use in a remote key-delivery function, the SCD does not use it for any 19-12.a Examine implementation schematics and other relevant documentation to identify PKI architecture and where certificates are used in the implementation.</li> <li>19.12.b Identify mechanism(s) used to restrict certificates to a single-purpose use as either:</li> <li>a) Separation of the Sub-CAs issuing the certificates, or</li> <li>b) Policy-based certificate segmentation that depends upon a characteristic of the certificate.</li> </ul>	cluded in a certificate that						



Annex A2, Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
	<b>2.c</b> If CA separation is used to ensure certificate segmentation, confirm that the wing are true:	<report findings="" here=""></report>							
a)	The designation of each Sub-CA is documented.								
b)	Policies and procedures are in place to support and require appropriate use of each Sub-CA.								
c)	Any Sub-CA used to produce certificates used for remote key-delivery functions (i.e. encryption, POI authentication, or KDH authentication) is not used to produce certificates used for any other purpose.								
d)	Any Sub-CA used to produce certificates for POI firmware and POI application authentication is not used for any other purpose.								
	<b>2.d</b> If policy-based certificate segmentation is used to ensure certificate nentation, confirm that all of the following are true:	<report findings="" here=""></report>							
a)	The method of segmentation between certificates is clearly stated in the certificate practice statement (CPS) for the CA.								
b)	Certificates issued for all of the remote key-distribution functions (i.e. encryption, POI authentication, or KDH authentication) include a mechanism to identify designation for this purpose.								
c)	Policies and procedures are in place to support and require specific function designation for each certificate issued, and there is evidence that such procedures are followed.								
d)	The SCDs involved in the remote key-delivery functions ensure that the certificates used for these functions are designated for the purpose for which they are being used.								
e)	The SCDs involved in remote key delivery ensure that certificates with remote key- delivery designation are not used for some other purpose.								



Annex A2, Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
	<b>12.e</b> Confirm that the mechanisms in place are effective in restricting the certificates to ngle purpose use as noted below:	<report findings="" here=""></report>							
a)	Certificates associated with encryption for remote key-distribution functions are not used for any other purpose.								
b)	Certificates associated with authentication of the KDH are not used for any other purpose.								
c)	Certificates associated with authentication of the POI are not used for any other purpose.								
d)	Certificates associated with authentication of POI firmware and POI applications are not used for any other purpose.								



## Control Objective 6: Keys are administered in a secure manner.

	Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 21:</b> Secret keys used for enciphering PIN-encryption keys or for PIN encryption, or private keys used in connection with remote key- distribution implementations, must never exist outside of SCDs, except when encrypted or securely stored and managed using the principles of dual control and split knowledge.									
or more of the follow	sed to sign certificates, certificate status lists, messages, or for key pr ving forms: e cryptographic device that meets applicable PCI requirements for suc								
<ul> <li>Encrypted using</li> </ul>	g an algorithm and key size of equivalent or greater strength, or								
<ul> <li>As key shares u control and split</li> </ul>	using a recognized secret-sharing scheme (e.g., Shamir), that are at a t knowledge.								
used to sign certifica	umented key-management procedures to verify that private keys ates, certificate-status lists, messages, or for key protection must more of the approved forms at all times.								
management superv	-management operations and interview key custodians and key- visory personnel to verify that private keys used to sign certificates, s, messages, or for key protection must exist only in one or more of at all times.	<report findings="" here=""></report>							
Requirement 22:	Procedures must exist and be demonstrably in use to replace a enciphered with the compromised key) to values not feasibly re		omised a	nd its sub	osidiary k	eys (thos	e keys		
22-3 Root CAs must implementation of se	t provide for segmentation of risk to address key compromise. An exa	mple of this would be the							
	camination of documented procedures, interviews and observation As provide for segmentation of risk to address key compromise.	<report findings="" here=""></report>							
	nust be in place to respond to address compromise of a CA due to, fo his must include procedures to revoke or otherwise invalidate the usa ffected entities.								



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>22-4.a</b> Examine documented procedures to verify that mechanisms are defined to respond to compromise of a CA. Verify the mechanisms include procedures to:	<report findings="" here=""></report>							
Revoke subordinate certificates, and								
Notify affected entities.								
<b>22-4.b</b> Interview responsible personnel to verify that the defined mechanisms to respond to compromise of a CA are in place and include:	<report findings="" here=""></report>							
<ul> <li>Revoking subordinate certificates, and</li> </ul>								
Notifying affected entities.								
<b>22-4.1</b> The CA must cease issuance of certificates if a compromise is known or suspect assessment, including a documented analysis of how and why the event occurred.	ted and perform a damage							
<b>22-4.1.a</b> Examine documented procedures to verify that the following are required in the event a compromise is known or suspected:	<report findings="" here=""></report>							
The CA will cease issuance of certificates.								
<ul> <li>The CA will perform a damage assessment, including a documented analysis of how and why the event occurred.</li> </ul>								
<b>22-4.1.b</b> Interview responsible personnel and observe process to verify that in the event a compromise is known or suspected:	<report findings="" here=""></report>							
The CA ceases issuance of certificates.								
<ul> <li>The CA performs a damage assessment, including a documented analysis of how and why the event occurred.</li> </ul>								
<b>22-4.2</b> In the event of a confirmed compromise, the CA must determine whether to revocertificates with a newly generated signing key.	oke and reissue all signed							
<b>22-4.2.a</b> Examine documented procedures to verify that in the event of a confirmed compromise, procedures are defined for the CA to determine whether to revoke and reissue all signed certificates with a newly generated signing key.	<report findings="" here=""></report>	<u>.</u>	<u> </u>	<u> </u>	<u> </u>	·		
<b>22-4.2.b</b> Interview responsible personnel to verify procedures are followed for the CA to determine whether to revoke and reissue all signed certificates with a newly generated signing key.	<report findings="" here=""></report>							



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>22-4.3</b> Mechanisms (for example, time stamping) must exist to prevent the usage of fraudulent certificates, once identified.								
<b>22-4.3.a</b> Examine documented procedures to verify that mechanisms are defined to prevent the usage of fraudulent certificates.	<report findings="" here=""></report>							
<b>22-4.3.b</b> Interview responsible personnel and observe implemented mechanisms to verify the prevention of the use of fraudulent certificates	<report findings="" here=""></report>							
<b>22-4.4</b> The compromised CA must notify any superior or subordinate CAs of the compromise. The compromise damage analysis must include a determination of whether subordinate CAs and KDHs must have their certificates reissued and distributed to them or be notified to apply for new certificates.								
<b>22-4.4.a</b> Examine documented procedures to verify that the following procedures are required in the event of a compromise:	<report findings="" here=""></report>							
The CA will notify any superior CAs.								
The CA will notify any subordinate CAs.								
The CA will perform a damage assessment to determine the need to either:								
<ul> <li>Reissue and distribute certificates to affected parties, or</li> </ul>								
<ul> <li>Notify the affected parties to apply for new certificates.</li> </ul>								
<b>22-4.4.b</b> Interview responsible personnel to verify that the following procedures are performed in the event a compromise:	<report findings="" here=""></report>							
The CA notifies any superior CAs.								
The CA notifies any subordinate CAs.								
The CA performs a damage assessment to determine the need to either:								
<ul> <li>Reissues and distributes certificates to affected parties, or</li> </ul>								
<ul> <li>Notifies the affected parties to apply for new certificates.</li> </ul>								



Annex A2, Control Objective 6 PCI PIN Security Requirements		Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
22-5 Minimum cryptographic strength for the CA system shall be:									
<ul> <li>Root and subordinate CAs have a minimum RSA 2048 bits or equivalent;</li> </ul>									
<ul> <li>EPP/PED devices have a minimum RSA 1024 bits or equivalent.</li> </ul>									
KDH devices have a minimum RSA 2048 bits or equivalent.									
The key-pair lifecycle shall result in expiration of KDH keys every five years, unless anoth the use of a compromised KDH private key.	er mechanism exists to prevent								
<b>22-5.a</b> Interview appropriate personnel and examine documented procedures for the creation of these keys.	<report findings="" here=""></report>								
<b>22-5.b</b> Verify that the following minimum key sizes exist for RSA keys or the equivalent for the algorithm used as defined in Annex C:	nt <report findings="" here=""></report>								
2048 for CAs and KDHs									
1024 POI devices									
<b>22-5.c</b> Verify that KDH keys expire every five years unless another mechanism exists to prevent the use of a compromised KDH private key.	<report findings="" here=""></report>								
Requirement 25: Access to secret or private cryptographic keys and key material	must be:								
a. Limited to a need-to-know basis so that the fewest number	of key custodians are necessar	y to enat	ole their e	ffective u	ise, and				
b. Protected such that no other person (not similarly entrusted	l with that component) can obse	erve or ot	herwise c	btain the	compon	ent.			
<b>25-2</b> All user access to material that can be used to construct secret and private keys (such as key components or key shares used to reconstitute a key) must be directly attributable to an individual user—for example, through the use of unique IDs.									
<i>Note</i> : Individual user IDs may be assigned to a role or group.	1								
<b>25-2.a</b> Examine documented procedures to confirm that access to material that can be used to construct secret and private keys is directly attributable to an individual user.	<report findings="" here=""></report>								
<b>25-2.b</b> Observe the access-control mechanisms in place to verify that access to material that can be used to construct secret and private keys is directly attributable to an individual user.	<report findings="" here=""></report>								



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Finding (check one)					
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>25-2.1</b> All user access must be restricted to actions authorized for that role. <b>Note:</b> Examples of how access can be restricted include the use of CA software and of controls.	perating-system and procedural						
<b>25-2.1.a</b> Examine documented procedures to confirm that access to material that can be used to construct secret and private keys must be restricted to actions authorized for that role.	<report findings="" here=""></report>						
<b>25-2.1.b</b> Observe user role assignments and access-control mechanisms to verify that access to material that can be used to construct secret and private keys is restricted to actions authorized for that role.	<report findings="" here=""></report>						
<b>25-3</b> The system enforces an explicit and well-defined certificate security policy and certification practice statement. This must include the following:							
<b>25-3.1</b> CA systems that issue certificates to other CAs and KDHs must be operated off network (not a network segment).	line using a dedicated closed						
• The network must only be used for certificate issuance and/or revocation.							
• Outside network access (e.g., using a separate platform in the DMZ) shall exist on certificate-status information to relying parties (e.g., example, KDHs).	ly for the purposes of "pushing"						
<b>25-3.1</b> Examine network diagrams and observe network and system configurations to verify:	<report findings="" here=""></report>						
<ul> <li>CA systems that issue certificates to other CAs and KDHs are operated offline using a dedicated closed network (not a network segment).</li> </ul>							
<ul> <li>The network is only used for certificate issuance, revocation, or both certificate issuance and revocation.</li> </ul>							
<ul> <li>Outside network access shall exist only for the purposes of "pushing" certificate- status information to relying parties (for example, KDHs).</li> </ul>							
<b>25-3.2</b> For CAs operated online—e.g., POI-signing CAs: CA or Registration Authority (I be done over the network (local console access must be used for CA or RA software up)							
<b>25-3.2</b> Examine software update processes to verify that local console access is used for all CA or RA software updates.	<report findings="" here=""></report>						
<b>25-3.3</b> For CAs operated online—e.g., POI-signing CAs: Non-console access must use This also applies to the use of remote console access.	e multi-factor authentication.						



Annex A2, Control Objective 6 PCI PIN Security Requirements and Test Procedures	Reporting Details:	Sum	mary of . ((	Assessn check one		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>25-3.3</b> Examine remote-access mechanisms and system configurations to verify that all non-console access, including remote access, requires multi-factor authentication.	<report findings="" here=""></report>					
<ul> <li>25-3.4 For CAs operated online—e.g., POI-signing CAs: Non-console user access to the environments shall be protected by authenticated encrypted sessions. No other remote or RA platform(s) for system or application administration.</li> <li>Note: Access for monitoring only (no create, update, delete capability) of online system</li> </ul>	access is permitted to the CA					
<b>25-3.4.a</b> Examine non-console access mechanisms and system configurations to verify that all non-console user access is protected by authenticated encrypted sessions.	<report findings="" here=""></report>				1	
<b>25-3.4.b</b> Observe an authorized CA personnel attempt non-console access to the host platform using valid CA credentials without using an authenticated encrypted session to verify that non-console access is not permitted.	<report findings="" here=""></report>					
<ul> <li>25-3.5 CA certificate (for POI/KDH authentication and validity status checking) signing under at least dual control.</li> <li>Note: Certificate requests may be vetted (approved) using single user logical access to</li> </ul>						
<b>25-3.5.a</b> Examine the certificate security policy and certification practice statement to verify that CA certificate-signing keys must only be enabled under at least dual control.	<report findings="" here=""></report>				1	
<b>25-3.5.b</b> Observe certificate-signing processes to verify that signing keys are enabled only under at least dual control.	<report findings="" here=""></report>					
<b>25-4</b> The CA shall require a separation of duties for critical CA functions to prevent one p CA system without detection, the practice referred to as "dual control." At a minimum, the for operational procedures such that no one person can gain control over the CA signing	re shall be multi-person control					



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Finding (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
25-4.a Examine documented procedures to verify they include following:	<report findings="" here=""></report>							
Definition of critical functions of the CA								
<ul> <li>Separation of duties to prevent one person from maliciously using a CA system without detection</li> </ul>								
<ul> <li>Multi-person control for operational procedures such that no one person can gain control over the CA signing key(s)</li> </ul>								
25-4.b Observe CA operations and interview responsible personnel to verify:	<report findings="" here=""></report>							
Definition of Critical functions of the CA								
<ul> <li>Separation of duties to prevent one person from maliciously using a CA system without detection</li> </ul>								
<ul> <li>Multi-person control for operational procedures such that no one person can gain control over the CA signing key(s)</li> </ul>								
<b>25-5</b> All CA systems that are not operated exclusively offline must be hardened to prever include:	t insecure network access, to							
<ul> <li>Services that are not necessary or that allow non-secure access (for example, rlogin removed or disabled.</li> </ul>	, rshell, telnet, ftp, etc.) must be							
Unnecessary ports must also be disabled.								
Documentation must exist to support the enablement of all active services and ports.								
25-5.a Examine system documentation to verify the following is required:	<report findings="" here=""></report>							
<ul> <li>Services that are not necessary or that allow non-secure access (for example, rlogin, rshell, etc., commands in UNIX) must be removed or disabled.</li> </ul>								
Unnecessary ports must also be disabled.								
Documentation must exist to support the enablement of all active services and ports.								



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findin (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>25-5.b</b> For a sample of systems, examine documentation supporting the enablement of active services and ports, and observe system configurations to verify:	<report findings="" here=""></report>							
<ul> <li>Services that are not necessary or that allow non-secure access (for example, rlogin, rshell, etc., commands in UNIX) are removed or disabled.</li> </ul>								
Unnecessary ports are disabled.								
There is documentation to support all active services and ports.								
<b>25-5.1</b> All vendor-default IDs must be changed, removed, or disabled unless necessary business reason.	for a documented and specific							
Vendor default IDs that are required as owners of objects or processes or for installation must only be enabled when necessary and otherwise must be disabled from login.	n of patches and upgrades							
25-5.1.a Examine documented procedures to verify that:	<report findings="" here=""></report>							
<ul> <li>Vendor-default IDs are changed, removed, or disabled unless necessary for a documented and specific business reason.</li> </ul>								
<ul> <li>Vendor default IDs that are required as owners of objects or processes or for installation of patches and upgrades are only be enabled when required and otherwise must be disabled from login.</li> </ul>								
<b>25-5.1.b</b> Examine system configurations and interview responsible personnel to verify that:	<report findings="" here=""></report>							
<ul> <li>Vendor-default IDs are changed, removed or disabled unless necessary for a documented and specific business reason.</li> </ul>								
<ul> <li>Vendor default IDs that are required as owners of objects or processes or for installation of patches and upgrades are only be enabled when required and otherwise must be disabled from login.</li> </ul>								
<b>25-5.2</b> Vendor defaults, including passwords and SNMP strings, that exist and are not a must be changed, removed, or disabled before installing a system on the network.	ddressed in the prior step							
<b>25-5.2.a</b> Examine documented procedures to verify that vendor defaults, including passwords and SNMP strings, that exist and are not addressed in the prior step are changed, removed, or disabled before installing a system on the network.	<report findings="" here=""></report>							



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findin (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>25-5.2.b</b> Examine system configurations and interview responsible personnel to verify that vendor defaults, including passwords and SNMP strings, that exist and are not addressed in the prior step are changed, removed, or disabled before installing a system on the network.	<report findings="" here=""></report>							
25-6 Audit trails must include but not be limited to the following:								
<ul> <li>All key-management operations—such as key generation, loading, transmission, bac destruction, and certificate generation or revocation</li> </ul>	kup, recovery, compromise,							
The identity of the person authorizing the operation								
<ul> <li>The identities of all persons handling any key material (such as key components or k or media)</li> </ul>	eys stored in portable devices							
<ul> <li>Protection of the logs from alteration and destruction</li> </ul>								
<b>25-6.a</b> Examine system configurations and audit trails to verify that all key- management operations are logged.	<report findings="" here=""></report>	·	·					
<b>25-6.b</b> For a sample of key-management operations, examine audit trails to verify they include:	<report findings="" here=""></report>							
<ul> <li>The identity of the person authorizing the operation</li> </ul>								
<ul> <li>The identities of all persons handling any key material</li> </ul>								
<ul> <li>Mechanisms exist to protect logs from alteration and destruction</li> </ul>								
<b>25-6.1</b> Audit logs must be archived for a minimum of two years.	1							
<b>25-6.1</b> Examine audit trail files to verify that they are archived for a minimum of two years.	<report findings="" here=""></report>		·		1			
<b>25-6.2</b> Records pertaining to certificate issuance and revocation must, at a minimum, b associated certificate.	e retained for the life of the							
<b>25-6.2.a</b> For a sample of certificate issuances, examine audit records to verify that the records are retained for at least the life of the associated certificate.	<report findings="" here=""></report>							
<b>25-6.2.b</b> For a sample of certificate revocations, examine audit records to verify that the records are retained for at least the life of the associated certificate.	<report findings="" here=""></report>							



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Sum	mary of (	Assessn check on		dings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>25-6.3</b> Logical events are divided into operating-system and CA application events. For recorded in the form of an audit record:	both, the following must be					
Date and time of the event,						
<ul> <li>Identity of the entity and/or user that caused the event,</li> </ul>						
Type of event, and						
Success or failure of the event.						
<b>25-6.3.a</b> Examine audit trails to verify that logical events are divided into operating- system and CA application events.	<report findings="" here=""></report>					
<b>25-6.3.b</b> Examine a sample of operating-system logs to verify they contain the following information:	<report findings="" here=""></report>					
• Date and time of the event,						
<ul> <li>Identity of the entity and/or user that caused the event,</li> </ul>						
Type of event, and						
Success or failure of the event.						
<b>25-6.3.c</b> Examine a sample of application logs to verify they contain the following information:	<report findings="" here=""></report>					
• Date and time of the event,						
<ul> <li>Identity of the entity and/or user that caused the event,</li> </ul>						
Type of event, and						
Success or failure of the event.						



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Sum		Assessn check on	n <b>ent Finc</b> e)	lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>25-7</b> CA application logs must use a digital signature or a symmetric MAC (based on one 16609 – Banking – Requirements for message authentication using symmetric technique alteration.						
The signing/MACing key(s) used for this must be protected using a secure cryptographic key-management requirements stipulated in this document.	device in accordance with the					
<b>25-7.a</b> Examine log security controls to verify that CA application logs use a digital signature or a symmetric MAC (based on one of the methods stated in <i>ISO 16609 – Banking – Requirements for message authentication using symmetric techniques</i> ) mechanism for detection of alteration.	<report findings="" here=""></report>					
<b>25-7.b</b> Examine documentation and interview personnel and observe to verify that signing/MACing key(s) used for this are protected using a secure cryptographic device in accordance with the key-management requirements stipulated in this document.	<report findings="" here=""></report>					
<b>25-7.1</b> Certificate-processing system components operated online must be protected b unauthorized access, including casual browsing and deliberate attacks. Firewalls must						
Deny all services not explicitly permitted.						
<ul> <li>Disable or remove all unnecessary services, protocols, and ports.</li> </ul>						
<ul> <li>Fail to a configuration that denies all services and require a firewall administrator to failure.</li> </ul>	o re-enable services after a					
Disable source routing on the firewall.						
Not accept traffic on its external interfaces that appears to be coming from internal	network addresses.					
<ul> <li>Notify the firewall administrator in near real time of any item that may need immedi in, little disk space available, or other related messages so that an immediate action</li> </ul>						
<ul> <li>Run on a dedicated computer: All non-firewall related software, such as compilers, software, etc., must be deleted or disabled.</li> </ul>	editors, communications					
<b>25-7.1.a</b> Examine network and system configurations to verify that certificate- processing system components operated online are protected from unauthorized access by firewall(s).	<report findings="" here=""></report>					



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Sum		Assessn heck on	nent Find e)	lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
25-7.1.b Examine firewall configurations for verify they are configured to:	<report findings="" here=""></report>		·			
Deny all services not explicitly permitted.						
<ul> <li>Disable or remove all unnecessary services, protocols, and ports.</li> </ul>						
<ul> <li>Fail to a configuration that denies all services and require a firewall administrator to re-enable services after a failure.</li> </ul>						
Disable source routing on the firewall.						
<ul> <li>Not accept traffic on its external interfaces that appears to be coming from internal network addresses.</li> </ul>						
<ul> <li>Notify the firewall administrator in near real time of any item that may need immediate attention such as a break-in, little disk space available, or other related messages so that an immediate action can be taken.</li> </ul>						
<ul> <li>Run on a dedicated computer: All non-firewall related software, such as compilers, editors, communications software, etc., must be deleted or disabled.</li> </ul>						
<b>25-7.2</b> Online certificate-processing systems must employ individually or in combination intrusion detection systems (IDS) to detect inappropriate access. At a minimum, databas servers for RA and web, as well as the intervening segments, must be covered.						
<b>25-7.2.a</b> Observe network-based and/or host-based IDS configurations to verify that on-line certificate-processing systems are protected by IDS to detect inappropriate access.	<report findings="" here=""></report>					
<b>25-7.2.b</b> Verify that IDS coverage includes all database servers, RA application servers and web servers, as well as the intervening segments.	<report findings="" here=""></report>					
25-8 Implement user-authentication management for all system components as follows:						
25-8.1 Initial, assigned passphrases are pre-expired (user must replace at first logon).						
<b>25-8.1</b> Examine password procedures and observe security personnel to verify that first-time passwords for new users, and reset passwords for existing users, are set to a unique value for each user and are pre-expired.	<report findings="" here=""></report>					
25-8.2 Use of group, shared, or generic accounts and passwords, or other authentication	on methods is prohibited.					



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Sum	mary of a	Assessn heck one		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>25-8.2.a</b> For a sample of system components, examine user ID lists to verify the following:	<report findings="" here=""></report>					
Generic user IDs and accounts are disabled or removed.						
<ul> <li>Shared user IDs for system administration activities and other critical functions do not exist.</li> </ul>						
Shared and generic user IDs are not used.						
<b>25-8.2.b</b> Examine authentication policies/procedures to verify that group and shared passwords or other authentication methods are explicitly prohibited.	<report findings="" here=""></report>					
<b>25-8.2.c</b> Interview system administrators to verify that group and shared passwords or other authentication methods are not distributed, even if requested.	<report findings="" here=""></report>					
<b>25-8.3</b> If passwords are used, system-enforced expiration life must not exceed 90 days one day.	and a minimum life at least					
<b>25-8.3</b> For a sample of system components, obtain and inspect system configuration settings to verify that user password parameters are set to require users to change passwords at least every 90 days and have a minimum life of at least one day.	<report findings="" here=""></report>					
<b>25-8.4</b> Passwords must have a minimum length of eight characters using a mix of alph characters or equivalent strength as defined in <i>NIST SP 800-63B</i> .	abetic, numeric, and special					
<b>25-8.4</b> For a sample of system components, obtain and inspect system configuration settings to verify that password parameters are set to require passwords to be at least eight characters long and contain numeric, alphabetic, and special characters or equivalent strength as defined in <i>NIST SP 800-63B</i> .	<report findings="" here=""></report>					
25-8.5 Limit repeated access attempts by locking out the user ID after not more than five	ve attempts.					
<b>25-8.5</b> For a sample of system components, obtain and inspect system configuration settings to verify that authentication parameters are set to require that a user's account be locked out after not more than five invalid logon attempts.	<report findings="" here=""></report>					
<b>25-8.6</b> Authentication parameters must require a system-enforced passphrase history, passphrase used in the last 12 months.	preventing the reuse of any					



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Sum		Assessn heck on	<b>nent Finc</b> e)	dings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not i Plac
<b>25-8.6</b> For a sample of system components, obtain and inspect system configuration settings to verify that authentication parameters are set to require a system-enforced passphrase history, preventing the reuse of any passphrase used in the last 12 months.	<report findings="" here=""></report>					
<b>25-8.7</b> Passwords are not stored on any of the systems except in encrypted form or as parameters form and the systems.	part of a proprietary one-way					
<b>25-8.7</b> For a sample of system components, obtain and inspect system configuration settings to verify that passwords are not stored unless encrypted as part of a proprietary one-way hash.	<report findings="" here=""></report>	·				
25-8.8 The embedding of passwords in shell scripts, command files, communication scr	ipts, etc. is strictly prohibited.					
<b>25-8.8.a</b> Examine policies and procedures and interview personnel to determine that the embedding of passwords in shell scripts, command files, communication scripts, etc. is strictly prohibited.	<report findings="" here=""></report>	1	11		1	
<b>25-8.8.b</b> Inspect a sample of shell scripts, command files, communication scripts, etc. to verify that passwords are not embedded in shell scripts, command files, or communication scripts.	<report findings="" here=""></report>					
<b>25-8.9</b> Where log-on security tokens (for example, smart cards) are used, the security to associated usage-authentication mechanism, such as a biometric or associated PIN/pasage. The PIN/passphrase must be at least eight decimal digits in length, or equivalent <b>Note:</b> Log-on security tokens (for example, smart cards) and encryption devices are not management requirements for password expiry as stated above.	ssphrase to enable their t.					
<b>25-8.9.a</b> If log-on security tokens are used, observe devices in use to verify that the security tokens have an associated usage-authentication mechanism, such as a biometric or associated PIN/passphrase to enable their usage.	<report findings="" here=""></report>		1			·
<b>25-8.9.b</b> Examine token-configuration settings to verify parameters are set to require that PINs/passwords be at least eight decimal digits in length, or equivalent.	<report findings="" here=""></report>					
-9 Implement a method to synchronize all critical system clocks and times for all system perations.	ns involved in key-management					



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Finding (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>25-9.a</b> Examine documented procedures and system configuration standards to verify a method is defined to synchronize all critical system clocks and times for all systems involved in key-management operations.	<report findings="" here=""></report>							
<b>25-9.b</b> For a sample of critical systems, examine the time-related system parameters to verify that system clocks and times are synchronized for all systems involved in key-management operations.	<report findings="" here=""></report>							
<b>25-9.c</b> If a manual process is defined, verify that the documented procedures require that it occur at least quarterly.	<report findings="" here=""></report>							
<b>25-9.d</b> If a manual process is defined, examine system configurations and synchronization logs to verify that the process occurs at least quarterly.	<report findings="" here=""></report>							
Requirement 28: Documented procedures must exist and be demonstrably in use	e for all key-administration oper	ations.						
<b>28-2</b> CA operations must be dedicated to certificate issuance and management. All physi components must be separated from key-distribution systems.	cal and logical CA system							
28-2.a Examine documented procedures to verify:	<report findings="" here=""></report>							
CA operations must be dedicated to certificate issuance and management.								
<ul> <li>All physical and logical CA system components must be separated from key- distribution systems.</li> </ul>								
<b>28-2.b</b> Observe CA system configurations and operations to verify they are dedicated to certificate issuance and management.	<report findings="" here=""></report>							
<b>28-2.c</b> Observe system and network configurations and physical access controls to verify that all physical and logical CA system components are separated from key-distribution systems.	<report findings="" here=""></report>							



Annex A2, Control Objective 6 PCI PIN Security Requirements Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>28-3</b> Each CA operator must develop a certification practice statement (CPS). (See <i>RFC Key Infrastructure Certificate Policy and Certification Practices Framework</i> for an example							
The CPS must be consistent with the requirements described within this document.							
The CA shall operate in accordance with its CPS.							
<b>Note:</b> This may take the form of a declaration by the CA operator of the details of its trust practices it employs in its operations and in support of the issuance of certificates. A CPS specific, single document or a collection of specific documents.							
The CPS must be consistent with the requirements described within this document. The 0 with its CPS.	CA shall operate in accordance						
<b>28-3.a</b> Examine documented certification practice statement (CPS) to verify that the CPS is consistent with the requirements described within this document.	<report findings="" here=""></report>					<u>.</u>	
<b>28-3.b</b> Examine documented operating procedures to verify they are defined in accordance with the CPS.	<report findings="" here=""></report>						
<b>28-3.c</b> Interview personnel and observe CA processes to verify that CA operations are in accordance with its CPS.	<report findings="" here=""></report>						
<b>28-4</b> Each CA operator must develop a certificate policy. (See RFC 3647- Internet X.509 Certificate Policy and Certification Practices Framework for an example of content.)	Public Key Infrastructure						



Annex A2, Control Objective 6 Reporting Details: PCI PIN Security Requirements	Summary of Assessment Finding (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
28-4 Examine documented certificate policy to verify that the CA has one in place.							
<b>28-5</b> Documented procedures exist and are demonstrably in use by CAs to validate the id requestor and recipient before issuing a digital certificate for the recipient's associated pul request is not generated within the same secure room meeting the requirements of the Le below. These procedures must include at a minimum, two or more of the following for KDI	blic key where the certificate evel 3 environment defined						
<ul> <li>Verification of the certificate applicant's possession of the associated private key thro signed certificate request pursuant to PKCS #10 or another cryptographically-equival</li> </ul>							
<ul> <li>Determination that the organization exists by using at least one third-party identity-pro- alternatively, organizational documentation issued by or filed with the applicable gove authority that confirms the existence of the organization;</li> </ul>							
<ul> <li>Confirmation by telephone, confirmatory postal mail, and/or comparable procedure to confirm that the organization has authorized the certificate application, confirmation o representative submitting the certificate application on behalf of the certificate applica authority of the representative to act on behalf of the certificate applicant;</li> </ul>	f the employment of the						
<ul> <li>Confirmation by telephone, confirmatory postal mail, and/or comparable procedure to representative to confirm that the person named as representative has submitted the</li> </ul>							
<b>28-5.a</b> Examine documented procedures to verify that unless the certificate request is generated within the same secure room meeting the requirements of the Level 3 environment, they include validating the identity of the certificate requestor and recipient before issuing a digital certificate for the recipient's associated public key.	<report findings="" here=""></report>						
environment, they include validating the identity of the certificate requestor and							

 28-5.b Observe certificate-issuing processes to verify that the identities of the certificate
 <Report Findings Here>

 requestor and recipient are validated before issuing a digital certificate for the
 <Report Findings Here>

 recipient's associated public key.



Annex A2, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>28-5.1</b> For CA and KDH certificate-signing requests, including certificate or key-validity revocation, suspension, replacement—verification must include validation that:	status changes—for example,							
• The entity submitting the request is who it claims to be.								
<ul> <li>The entity submitting the request is authorized to submit the request on behalf of t originating entity.</li> </ul>	he certificate request's							
<ul> <li>The entity submitting the request has a valid business relationship with the issuing vendor) consistent with the certificate being requested.</li> </ul>	authority (for example, the							
<ul> <li>The certificate-signing request has been transferred from the certificate request's or secure manner.</li> </ul>	originating entity to the RA in a							
<b>28-5.1.a</b> Examine documented procedures to verify that certificate-signing requests, including certificate or key-validity status changes, require validation that:	<report findings="" here=""></report>							
The entity submitting the request is who it claims to be.								
• The entity submitting the request is authorized to submit the request on behalf of the certificate request's originating entity.								
<ul> <li>The entity submitting the request has a valid business relationship with the issuing authority (for example, the vendor) consistent with the certificate being requested.</li> </ul>								
• The certificate-signing request has been transferred from the certificate request's originating entity to the RA in a secure manner.								
<b>28-5.1.b</b> Observe certificate-signing requests, including certificate or key-validity status changes, to verify they include validation that:	<report findings="" here=""></report>							
The entity submitting the request is who it claims to be.								
• The entity submitting the request is authorized to submit the request on behalf of the certificate request's originating entity.								
<ul> <li>The entity submitting the request has a valid business relationship with the issuing authority (for example, the vendor) consistent with the certificate being requested.</li> </ul>								
• The certificate-signing request has been transferred from the certificate request's originating entity to the RA in a secure manner.								



Annex A2, Control Objective 6 PCI PIN Security Requirements and Test Procedures	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>28-5.2</b> RAs must retain documentation and audit trails relating to the identification of entities for all certificates issued and certificates whose status had changed for the life of the associated certificates.								
<b>28-5.2</b> Examine documentation and audit trails to verify that the identification of entities is retained for the life of the associated certificates:	<report findings="" here=""></report>	·			·			
For all certificates issued								
<ul> <li>For all certificates whose status had changed</li> </ul>								



Control Objective 7: Equipment used to process PINs and keys is managed in a secure manner.

Annex A2, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
Requirement 32:	Any SCD capable of encrypting a key and producing cryptograms protected against unauthorized use to encrypt known keys or kno following:								
	a. Dual access controls are required to enable the key-encryp	tion function.							
	b. Physical protection of the equipment (e.g., locked access to	o it) under dual control.							
	c. Restriction of logical access to the equipment								
<b>32-2.1</b> The certific follows:	ate-processing operations center must implement a three-tier physical	security boundary, as							
Level One Ba	arrier – Consists of the entrance to the facility.								
<ul> <li>Level Two Ba</li> </ul>	rrier – Secures the entrance beyond the foyer/reception area to the CA	A facility.							
	Barrier – Provides access to the physically secure, dedicated room hou application servers and cryptographic devices.	sing the CA and RA							
32-2.1.a Examine defined as follows	physical security policies to verify three tiers of physical security are :	<report findings="" here=""></report>							
Level One Ba	arrier – The entrance to the facility								
<ul> <li>Level Two Ba facility</li> </ul>	rrier – The entrance beyond the foyer/reception area to the CA								
	Barrier – Access to the physically secure, dedicated room housing A database and application servers and cryptographic devices								
32-2.1.b Observe implemented as for	the physical facility to verify three tiers of physical security are ollows:	<report findings="" here=""></report>							
Level One Ba	arrier – The entrance to the facility								
<ul> <li>Level Two Ba facility</li> </ul>	arrier – The entrance beyond the foyer/reception area to the CA								
	Barrier – Access to the physically secure, dedicated room housing A database and application servers and cryptographic devices								



Annex A2, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
Level 1 Bar	rier							
32-2.2 The entrance to the CA facility/building must include the following controls:								
<b>32-2.2.1</b> The facility entrance only allows authorized personnel to enter the facility.								
<b>32-2.2.1.a</b> Examine physical-security procedures and policies to verify they require that the facility entrance allows only authorized personnel to enter the facility.	<report findings="" here=""></report>							
<b>32-2.2.1.b</b> Observe the facility entrance and observe personnel entering the facility to verify that only authorized personnel are allowed to enter the facility.	<report findings="" here=""></report>							
<b>32-2.2.2</b> The facility has a guarded entrance or a foyer with a receptionist. No entry is entryway is not staffed—i.e., only authorized personnel who badge or otherwise author when entryway is unstaffed.								
<b>32-2.2.a</b> Examine physical-security procedures and policies to verify they require that the facility have a guarded entrance or a foyer with a receptionist or the entryway prevents access to visitors.	<report findings="" here=""></report>							
<b>32-2.2.b</b> Observe the facility entrance to verify it has a guarded entrance or a foyer with a receptionist.	<report findings="" here=""></report>							
32-2.2.3 Visitors (guests) to the facility must be authorized and be registered in a logb	ook.							
<b>32-2.2.3.a</b> Examine physical-security procedures and policies to verify they require visitors to the facility to be authorized and be registered in a logbook.	<report findings="" here=""></report>							
<b>32-2.2.3.b</b> Observe the facility entrance and observe personnel entering the facility to verify that visitors are authorized and registered in a logbook.	<report findings="" here=""></report>							
Level 2 Bar	rier							
32-2.3 The Level 2 barrier/entrance must only allow authorized personnel beyond this en	ntrance.							
<b>32-2.3.a</b> Examine physical-security procedures and policies to verify that only authorized personnel are allowed beyond the Level 2 barrier/entrance.	<report findings="" here=""></report>							
<b>32-2.3.b</b> Observe personnel entering the Level 2 barrier/entrance to verify that only authorized personnel are allowed through.	<report findings="" here=""></report>							



Annex A2, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
32-2.3.1 Visitors must be authorized and escorted at all times within the Level 2 envir	onment.							
<b>32-2.3.1.a</b> Examine documented policies and procedures to verify that authorized visitors must be escorted at all times within the Level 2 environment.	<report findings="" here=""></report>							
<b>32-2.3.1.b</b> Interview personnel and observe visitors entering the environment to verify that visitors are authorized and escorted at all times within the Level 2 environment.	<report findings="" here=""></report>							
<b>32-2.3.2</b> Access logs must record all personnel entering the Level 2 environment. <i>Note: The logs may be electronic, manual, or both.</i>								
<b>32-2.3.2.a</b> Examine documented policies and procedures to verify that access logs are required to record all personnel entering the Level 2 environment.	<report findings="" here=""></report>							
<b>32-2.3.2.b</b> Observe personnel entering the Level 2 barrier and examine corresponding access logs to verify that all entry through the Level 2 barrier is logged.	<report findings="" here=""></report>							
<b>32-2.4</b> The Level 2 entrance must be monitored by a video-recording system.								
<b>32-2.4.a</b> Observe the Level 2 entrance to verify that a video-recording system is in place.	<report findings="" here=""></report>	1	1	1				
<b>32-2.4.b</b> Examine a sample of recorded footage to verify that the video-recording system captures all entry through the Level 2 entrance.	<report findings="" here=""></report>							
Level 3 Bar	rier							
<b>32-2.5</b> The Level 3 environment must consist of a physically secure, dedicated room no activities but certificate operations.	t used for any other business							
Note: All certificate-processing operations must operate in the Level 3 environment.								
<b>32-2.5.a</b> Examine documented policies and procedures to verify that all certificate-processing systems must be located within a Level 3 environment.	<report findings="" here=""></report>							



Annex A2, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>32-2.5.b</b> Examine physical locations of certificate operations to verify that all certificate-processing systems are located within a Level 3 secure room.	<report findings="" here=""></report>	_						
<b>32-2.5.c</b> Observe operations and interview personnel to confirm that the Level 3 secure room is not used for any business activity other than certificate operations.	<report findings="" here=""></report>							
<b>32-2.5.1</b> Doors to the Level 3 secure room must have locking mechanisms.								
<b>32-2.5.1.a</b> Observe Level 3 environment entrances to verify that all doors to the Level 3 environment have locking mechanisms.	<report findings="" here=""></report>		1	1	1	1		
<b>32-2.5.2</b> The Level 3 environment must be enclosed on all sides (including the ceiling techniques such as true floor-to-ceiling (slab-to-slab) walls, steel mesh, or bars. For example, the Level 3 environment may be implemented within a "caged" environmented within a "c								
<b>32-2.5.2.a</b> Examine physical security documentation for the Level 3 environment to verify that the environment is enclosed on all sides (including the ceiling and flooring areas) using techniques such as have true floor-to-ceiling (slab-to-slab) walls, steel mesh, or bars	<report findings="" here=""></report>	1	1	1	1	1		
<b>32-2.5.2.b</b> Examine the physical boundaries of the Level 3 environment to verify that the environment is enclosed on all sides (including the ceiling and flooring areas) using techniques such as true floor-to-ceiling (slab-to-slab) walls, steel mesh, or bars and protection from entry from below floors and above ceilings.	<report findings="" here=""></report>							
32-2.6 Documented procedures must exist for:								
<ul> <li>Granting, revocation, and review of access privileges by an authorized officer of the</li> <li>Specific access authorizations, whether logical or physical</li> </ul>	entity operating the CA							
32-2.6.a Examine documented procedures to verify they include the following:	<report findings="" here=""></report>							
<ul> <li>Granting, revocation, and review of access privileges by an authorized officer of the entity operating the CA</li> </ul>								
Specific access authorizations, whether logical or physical								



Annex A2, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>32-2.6.b</b> Interview responsible personnel to verify that the documented procedures are followed for:	<report findings="" here=""></report>							
<ul> <li>Granting, revocation, and review of access privileges by an authorized officer of the entity operating the CA</li> </ul>								
Specific access authorizations, whether logical or physical								
<ul> <li>32-2.6.1 All authorized personnel with access through the Level 3 barrier must:</li> <li>Have successfully completed a background security check.</li> <li>Be assigned resources (staff, dedicated personnel) of the CA operator with de duties.</li> <li>Note: This requirement applies to all personnel with pre-designated access to the Level</li> </ul>								
<ul> <li>32-2.6.1.a Examine documented policies and procedures to verify they require personnel authorized as having access through the Level 3 barrier to:</li> <li>Have successfully completed a background security check.</li> <li>Be assigned resources of the CA operator with defined business needs and duties.</li> </ul>	<report findings="" here=""></report>	1	1		1	1		
<b>32-2.6.1.b</b> Interview responsible HR personnel to verify that background checks are conducted (within the constraints of local laws) on CA personnel prior such personnel being authorized for access through the Level 3 barrier.	<report findings="" here=""></report>							
<b>32-2.6.1.c</b> Interview a sample of personnel authorized for access through the Level 3 barrier to verify that they are assigned resources of the CA with defined business needs and duties.	<report findings="" here=""></report>							
<b>32-2.6.2</b> Other personnel requiring entry to this level must be accompanied by two (2) resources at all times.	authorized and assigned							
<b>32-2.6.2.a</b> Examine documented policies and procedures to verify that personnel requiring entry to this level must be accompanied by two (2) authorized and assigned resources at all times.	<report findings="" here=""></report>							
<b>32-2.6.2.b</b> Interview a sample of responsible personnel to verify that personnel requiring entry to this level are accompanied by two (2) authorized and assigned resources at all times.	<report findings="" here=""></report>							



Annex A2, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Sum		Assessm check one	ent Find	ings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<ul> <li>32-2.7 The Level 3 environment must require dual-control access and dual-occupancy s occupied by one person for more than thirty (30) seconds—i.e., one person may never b 30 seconds alone.</li> <li>For example: The Level 3 room is never occupied by one person except during the time period for entry/exit does not exceed 30 seconds.</li> </ul>	e in the room for more than					
<b>32-2.7.a</b> Examine documented policies and procedures to verify that the Level 3 environment requires dual-control access and dual-occupancy such that the room is never occupied by one person alone for more than thirty (30) seconds.	<report findings="" here=""></report>					
<b>32-2.7.b</b> Observe authorized personnel accessing the Level 3 environment to verify that dual-control access and dual-occupancy is enforced such that the room is never occupied by one person alone for more than thirty (30) seconds.	<report findings="" here=""></report>					
32-2.7.1 The mechanism for enforcing dual-control and dual-occupancy must be auto	mated.					
<b>32-2.7.1.a</b> Examine documented policies and procedures to verify that the defined enforcement mechanism is automated.	<report findings="" here=""></report>	·				
32-2.7.1.b Observe enforcement mechanism configuration to verify it is automated.	<report findings="" here=""></report>					
32-2.7.2 The system must enforce anti-pass-back.						
<b>32-2.7.2.a</b> Examine documented policies and procedures to verify that the system is required to enforce anti-pass-back.	<report findings="" here=""></report>					
<b>32-2.7.2.b</b> Observe mechanisms in use and authorized personnel within the environment to verify that anti-pass-back is enforced by the conduct of a test.	<report findings="" here=""></report>					
<b>32-2.7.3</b> Dual occupancy requirements are managed using electronic (for example, basystems.	adge and/or biometric)					
<b>32-2.7.3.a</b> Examine documented policies and procedures to verify that dual occupancy requirements are defined to be managed using electronic (for example, badge and/or biometric) systems.	<report findings="" here=""></report>	·				
<b>32-2.7.3.b</b> Observe mechanisms in use and authorized personnel within the environment to verify that dual-occupancy requirements are managed using electronic systems.	<report findings="" here=""></report>					



Annex A2, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>32-2.7.4</b> Any time a single occupancy exceeds 30 seconds, the system must automatically audit event that is followed up by security personnel.	generate an alarm and							
<b>32-2.7.4.a</b> Examine documented policies and procedures to verify that any time one person is alone in the room for more than 30 seconds, the system must automatically generate an alarm and an audit event that is followed up by security personnel.	<report findings="" here=""></report>							
<b>32-2.7.4.b</b> Observe mechanisms in use to verify that the system automatically generates an alarm event and an audit event when one person is alone in the room for more than 30 seconds.	<report findings="" here=""></report>							
<b>32-2.7.4.c</b> Examine a sample of audit events and interview security personnel to verify that the audit events are followed up by security personnel.	<report findings="" here=""></report>							
<b>32-2.8</b> Access to the Level 3 room must create an audit event, which must be logged.								
<b>32-2.8</b> Observe authorized personnel enter the environment and examine correlating audit logs to verify that access to the Level 3 room creates an audit log event.								
<b>32-2.8.1</b> Invalid access attempts to the Level 3 room must create audit records, which security personnel	n must be followed up by							
<b>32-2.8.1</b> Observe an invalid access attempt and examine correlating audit logs to verify that invalid access attempts to the Level 3 room create an audit log event.	<report findings="" here=""></report>		1	1	1			
32-2.9 The Level 3 environment must be monitored as follows:								
<b>32-2.9.1</b> A minimum of one or more cameras must provide continuous monitoring (for the Level 3 environment, including the entry and exit. <b>Note:</b> <i>Motion-activated systems that are separate from the intrusion-detection system</i>								
recording activity.	i may be used to activate							
<b>32-2.9.1.a</b> Observe the Level 3 physical environment to verify that cameras are in place to monitor the Level 3 environment, including the entry and exit.	<report findings="" here=""></report>							
<b>32-2.9.1.b</b> Examine monitoring system configurations (e.g., CCTV systems) to verify that continuous monitoring is provided.	<report findings="" here=""></report>							



Annex A2, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>32-2.9.1.c</b> If motion-activated systems are used for monitoring, observe system configurations for the motion-activated systems to verify they are separate from the intrusion-detection system.	<report findings="" here=""></report>				1			
<b>32-2.9.2</b> The cameras must record to time-lapse VCRs or similar mechanisms, with a equally recorded over every three seconds.	minimum of five frames							
<ul> <li>32-2.9.2 Examine monitoring system configurations to verify;</li> <li>The system records to time-lapse VCRs or similar mechanisms.</li> <li>A minimum of five frames are recorded every three seconds.</li> </ul>	<report findings="" here=""></report>							
<b>32-2.9.3</b> Continuous or motion-activated, appropriate lighting must be provided for the <b>Note:</b> Visible spectrum lighting may not be necessary if the cameras do not require su images (for example, if infrared cameras are used).								
<b>32-2.9.3.a</b> Observe the Level 3 physical environment to verify that continuous or motion-activated lighting is provided for each camera monitoring the environment.	<report findings="" here=""></report>							
<b>32-2.9.3.b</b> Examine a sample of captured footage from different days and times to ensure that the lighting is adequate.	<report findings="" here=""></report>							
<b>32-2.9.4</b> Surveillance cameras must be configured to prevent the monitoring of compupads, or other systems that may expose sensitive data. Cameras must not be able to zoom in or otherwise observe the aforementioned.								
<b>32-2.9.4.a</b> Observe each camera locations in the Level 3 environment to verify they are not set to monitor computer screens, keyboards, PIN pads, or other systems that may expose sensitive data.	<report findings="" here=""></report>							
<b>32-2.9.4.b</b> Examine a sample of captured footage to verify it does not allow for the monitoring of computer screens, keyboards, PIN pads, or other systems that may expose sensitive data.	<report findings="" here=""></report>							
<b>32-2.9.5</b> Personnel with access to the Level 3 environment must not have access to the tapes, digital-recording systems, etc.) containing the recorded surveillance data.	ne media (for example, VCR							



Annex A2, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>32-2.9.5.a</b> Examine documented access policies and procedures to verify that personnel with access to the Level 3 environment are not permitted to have access to the media containing recorded surveillance data for that environment.	<report findings="" here=""></report>								
<b>32-2.9.5.b</b> Examine Level 3 access lists as well as access controls to the media containing surveillance data, to verify that personnel with access to the Level 3 environment do not have access to the media containing recorded surveillance data.	<report findings="" here=""></report>								
32-2.9.6 Images recorded from the CCTV system must be securely archived for a per	iod of no less than 45 days.								
If digital-recording mechanisms are used, they must have sufficient storage capacity a backup) to prevent the loss of information necessary to reconstruct events for the most									
<b>32-2.9.6.a</b> Examine storage of captured recordings to verify that at least the most recent 45 days of images are securely archived.	<report findings="" here=""></report>								
<b>32-2.9.6.b</b> If digital-recording mechanisms are used, examine system configurations to verify that the systems have sufficient redundancy to prevent the loss of information necessary to reconstruct events for the most recent 45-day period.	<report findings="" here=""></report>								
<b>32-2.9.7</b> CCTV images must be backed up daily. The backup recording must be store location within the facility and must ensure segregation of duties between the users (p secure room) and administrators of the system. Alternatively, backups may be stored techniques such as disk mirroring, provided the storage is secure in accordance with t	ersonnel accessing the in other facilities via								
32-2.9.7 Examine backup techniques utilized to ensure that:	<report findings="" here=""></report>		·						
Backups are securely stored in a separate location from the primary.									
<ul> <li>Ensure that segregation is maintained between users and administrators of the system.</li> </ul>									
<b>32-3</b> The environment must have continuous (24/7) intrusion-detection systems in place, w room by motion detectors when unoccupied.	which protects the secure								
32-3.a Examine security policies and procedures to verify they require:	<report findings="" here=""></report>								
Continuous (24/7) intrusion-detection monitoring of the Level 3 environment.									
Motion detectors must be active when the environment is unoccupied.									



Annex A2, Control Objective 7 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
32-3.b Examine intrusion-detection system configurations to verify:	<report findings="" here=""></report>				-			
<ul> <li>Continuous (24/7) intrusion-detection monitoring of the Level 3 environment is in place.</li> </ul>								
<ul> <li>Motion detectors are active when the environment is unoccupied.</li> </ul>								
32-3.1 Any windows in the secure room must be locked and protected by alarmed sense	Drs.							
<b>32-3.1.a</b> Observe all windows in the secure room to verify they are locked and protected by alarmed sensors.	<report findings="" here=""></report>		1	I		I		
<b>32-3.1.b</b> Examine configuration of window sensors to verify that the alarm mechanism is active.	<report findings="" here=""></report>							
<b>32-3.1.c</b> Test at least one window (if they can be opened) to verify that the alarms function appropriately.	<report findings="" here=""></report>							
<b>32-3.2</b> Any windows or glass walls must be covered, rendered opaque, or positioned to observation of the secure room.	prevent unauthorized							
<b>32-3.2</b> Observe all windows and glass walls in the secure room to verify they are covered, rendered opaque, or positioned to prevent unauthorized observation of the secure room.	<report findings="" here=""></report>	·						
<b>32-3.3</b> The intrusion-detection system(s) must be connected to the alarm system and at time all authorized personnel have performed an authenticated exit of the secure room. configured to activate within 30 seconds.								
32-3.3.a Examine security system configurations to verify:	<report findings="" here=""></report>							
• The intrusion-detection system(s) is connected to the alarm system.								
The intrusion-detection system(s) is automatically activated every time all authorized personnel have exited the secure room.								
32-3.3.b Verify the IDS and alarms function correctly via:	<report findings="" here=""></report>							
<ul> <li>Having all authorized personnel who badged or otherwise authenticated into the area exit and one person remain behind even though they have badged out.</li> </ul>								
<ul> <li>Having all but one authorized person who badged or otherwise authenticated into the system badge out and exit.</li> </ul>								



Annex A2, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>32-3.4</b> Alarm activity must include unauthorized entry attempts or any actions that disab system.	le the intrusion-detection								
<b>32-3.4</b> Examine security-system configurations to verify that an alarm event is generated for:	<report findings="" here=""></report>								
Unauthorized entry attempts									
Actions that disable the intrusion-detection system									
<b>32-4</b> All non-CA personnel must sign an access logbook when entering the Level 3 environment. <b>Note:</b> This log is in addition to those provided by the access-control system.									
<b>32-4.a</b> Examine security policies and procedures to verify they require all non-CA personnel to sign an access logbook when entering the Level 3 environment.	<report findings="" here=""></report>								
<b>32-4.b</b> On the escorted entry into the secure room, observe that all non-CA personnel appropriately sign the access logbook.	<report findings="" here=""></report>								
32-4.1 The access log must include the following details:									
Name and signature of the individual									
Organization									
Date and time in and out									
Reason for access or purpose of visit									
For visitor access, the initials of the person escorting the visitor									
32-4.1 Examine the access logbook to verify it contains the following information:	<report findings="" here=""></report>								
Name and signature of the individual									
Organization									
Date and time in and out									
Reason for access or purpose of visit									
<ul> <li>For visitor access, the initials of the person escorting the visitor</li> </ul>									
<b>32-4.2</b> The logbook must be maintained within the Level 3 secure environment.									



Annex A2, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>32-4.2</b> Observe the location of the access logbook and verify that it is maintained within the Level 3 secure environment.	<report findings="" here=""></report>							
<b>32-5</b> All access-control and monitoring systems (including intrusion-detection systems) are uninterruptible power source (UPS).	e powered through an							
<b>32-5</b> Inspect uninterruptible power source (UPS) system configurations to verify that all access-control and monitoring systems, including intrusion-detection systems, are powered through the UPS.	<report findings="" here=""></report>							
32-6 All alarm events must be documented.								
<b>32-6.a</b> Examine security policies and procedures to verify they require that all alarm events are logged.	<report findings="" here=""></report>		1		1			
<b>32-6.b</b> Examine security-system configurations and documented alarm events to verify that all alarm events are logged.	<report findings="" here=""></report>							
<b>32-6.1</b> An individual must not sign off on an alarm event in which they were involved.								
<b>32-6.1.a</b> Examine documented procedures for responding to alarm events to verify that the procedure does not permit a person who was involved in an alarm event to sign-off on that alarm event.	<report findings="" here=""></report>		• •					
32-6.1.b Determine who is authorized to sign off on alarm events.	<report findings="" here=""></report>							
<b>32-6.1.c</b> For a sample of documented alarm events, examine the record to verify that personnel authorized to sign off on alarm events were not also the cause of that event.	<report findings="" here=""></report>							
<b>32-6.2</b> The use of any emergency entry or exit mechanism must cause an alarm event.								
<b>32-6.2.a</b> Examine security system configurations to verify that an alarm event is generated upon use of any emergency entry or exit mechanism.	<report findings="" here=""></report>		·		·			
32-6.2.b Conduct a test to verify the mechanisms work appropriately.	<report findings="" here=""></report>							
<b>32-6.3</b> All alarms for physical intrusion necessitate an active response within 30 minutes security duties.	by personnel assigned							



PCI PIN Security Requirements	Reporting Details:	Sum		ssessment Findings				
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>32-6.3.a</b> Examine documented procedures to verify they require that all alarms for physical intrusion must be responded to within 30 minutes by personnel assigned security duties.	<report findings="" here=""></report>		1		1	1		
<b>32-6.3.b</b> Examine a sample of alarm events and interview personnel assigned with security-response duties to verify that alarms for physical intrusion are responded to within 30 minutes.	<report findings="" here=""></report>							
<b>32-6.3.c</b> Conduct a test to verify the appropriate response occurs.	<report findings="" here=""></report>							
<b>32-7</b> A process must be implemented for synchronizing the time and date stamps of the and monitoring (camera) systems to ensure accuracy of logs. It must be ensured that synce CCTV, intrusion detection, and access control cannot exceed one minute. <i>Note: This may be done by either automated or manual mechanisms.</i>								
<b>32-7.a</b> Examine documented procedures to verify that mechanisms are defined (may be automated or manual) for synchronizing the time and date stamps of the access, intrusion-detection, and monitoring (camera) systems to ensure accuracy of logs.	<report findings="" here=""></report>	1	1		1	1		
<b>32-7.b</b> Examine system configurations for access, intrusion-detection, and monitoring (camera) systems to verify that time and date stamps are synchronized.	<report findings="" here=""></report>							
<b>32-7.c</b> Examine a sample of logs from the access, intrusion-detection, and monitoring (camera) systems to verify log time and date stamps are synchronized.	<report findings="" here=""></report>							
<b>32-7.1</b> If a manual synchronization process is used, synchronization must occur at least recorded, and variances documented; and documentation of the synchronization must b year period.								
<b>32-7.1.a</b> If a manual synchronization process is implemented, interview responsible personnel and examine records of synchronization to verify the mechanism is performed at least quarterly.	<report findings="" here=""></report>					-		
<b>32-7.1.b</b> Examine records of the synchronization process to verify that documentation is retained for at least one year.	<report findings="" here=""></report>							



## **Normative Annex B – Key-Injection Facilities**

Key-Injection Facility Security Requirements Technical Reference

## Introduction

This technical reference contains the specific requirements that apply to key-injection facilities for the loading of acquirer keys. It includes applicable criteria from the main body of the *PCI PIN Security Requirements.* Furthermore, it provides implementation criteria on how the requirements can be realized. Other implementation methods may be considered, assuming that they provide at least the same level of security.

This technical reference refers to Triple-DEA (TDEA) with at least double-length keys as the cryptographic standard for PIN encryption. However, defining the schedule for the migration from Single-DEA to Triple-DEA is reserved to the payment brands. The Advanced Encryption Standard may be used in place of TDEA for key-management purposes.

## Note:

From time to time, the standards change in order to more completely reflect the state of both technology and the threat environment at a particular point in time. It is necessary to ensure that the correct Technical Reference is used when evaluating whether a process, technique, piece of equipment, or policy is compliant with a specific requirement.

Key-injection systems that allow clear-text secret and/or private keys and/or their components to appear in unprotected memory (e.g., within a computer and outside of the secure boundary of a secure cryptographic device) are inherently less secure. Any such systems are subject to additional controls as delineated in the criteria in this annex.

Key-injection facilities that are engaged in either or both of the following must also meet the criteria delineated in Annex A:

- 1. Operations of Certification and Registration Authority platforms used in connection with remote key-distribution implementations. These requirements apply only to the entities operating Certification and/or Registration Authorities.
- 2. Remote distribution of symmetric keys using asymmetric techniques to transaction-originating devices. These criteria pertain to the characteristics of the actual key-distribution methodology implemented. If the key loading is not performed remotely and authentication is provided by another method—such as properly implemented dual control and key-loading device(s)—even if these systems involve the use of certificates, Annex A does not apply. "Remotely" means whenever the key-loading device and the POI device are neither co-located nor connected via a direct mechanism, such as a cable.



## Control Objective 1: PINs used in transactions governed by these requirements are processed using equipment and methodologies that ensure they are kept secure.

Annex B, Control Objective 1 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
Requirement 1:	All cardholder-entered PINs must be processed in equipment that of PINs must never appear in the clear outside of an SCD.	conforms to the requirements	s for secu	ire cryptc	graphic o	devices (S	SCDs).	
1-2 Key-injection fac	ilities must only inject keys into equipment that conforms to the requirem	ents for SCDs.						
	nented procedures and system documentation to verify that key- nd systems used for managing cryptographic keys are required to rements for SCDs.	<report findings="" here=""></report>	1		1	1	1	
<ul> <li>FIPS140-2 Leve</li> <li>PCI approved.</li> <li>Note: Key-injection p the keys that conform</li> </ul>	ardware security modules (HSMs) are either: I 3 or higher certified, or platforms and systems shall include hardware devices for managing (e.g m to the requirements for SCDs. This includes SCDs used in key-injectic EDs are not validated and approved to the KLD approval class, they mu quirement 13-9.	n facilities (e.g., modified						
<ul> <li>certification or PTS a HSMs are either:</li> <li>Listed on the <i>NI</i> listing number, a http://csrc.nist.g</li> <li>Listed on the PC</li> </ul>	ands/models used, examine approval documentation (e.g., FIPS approval) and examine the list of approved devices to verify that all <i>ST Cryptographic Module Validation Program</i> (CMVP) list, with a valid and approved to FIPS 140-2 Level 3, or higher. Refer ov. CI SSC website, with a valid SSC listing number, as Approved PCI ider the approval class "HSM." Refer to	<report findings="" here=""></report>				1	1	



Annex B, Control Objective 1 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Sum		Assessn check on	n <b>ent Finc</b> e)	lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
1-4 The approval listing must match the deployed devices in the following characteristics:						
Vendor name						
Model name and number						
Hardware version number						
Firmware version number						
The PCI PTS or FIPS 140 Approval Number						
<ul> <li>For PCI-approved HSMs, any applications, including application version number, resider were included in the PTS assessment</li> </ul>	nt within the device which					
<ul> <li>1-4.a For all PCI-approved HSMs used, examine HSM devices and examine the PCI SSC list of Approved PCI PTS Devices to verify that all of the following device characteristics match the PCI PTS listing for each HSM:</li> <li>Vendor name</li> </ul>	<report findings="" here=""></report>					
Model name/number						
Hardware version number						
Firmware version number						
The PCI PTS HSM approval number						
<ul> <li>Any applications, including application version number, resident within the device which were included in the PTS assessment</li> </ul>						
<b>1-4.b</b> For all FIPS-approved HSMs used, examine HSM devices and review the <i>NIST Cryptographic Module Validation Program</i> (CMVP) list to verify that all of the following device characteristics match the FIPS140-2 Level 3 (or higher) approval listing for each HSM:	<report findings="" here=""></report>					
Vendor name						
Model name/number						
Hardware version number						
Firmware version number						
The FIPS 140 approval number						



Annex B, Control Objective 1 PCI PIN Security Requirements	Reporting Details:	Sum	nmary of Assessment Findings (check one)				
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>1-5</b> The KIF platform provider maintains documentation detailing the KIF architecture and key-management flows. The platform provider must:							
<ul> <li>Maintain current documentation that describes or illustrates the architecture of the KIF, in functionality.</li> </ul>	ncluding all KIF						
<ul> <li>Maintain documentation detailing the flow of keys from the key generation, through the fudestination device. The documentation should indicate how personnel interaction and invocomponents are integrated into the flow.</li> </ul>	-						
<b>1-5.a</b> Interview relevant personnel and examine documentation to verify that procedures exist for maintaining documentation that describes and/or illustrates the architecture of the KIF.	<report findings="" here=""></report>						
<b>1-5.b</b> Interview relevant personnel and examine documentation that describes and/or illustrates the architecture of the KIF to verify that all KIF components, key-management flows, and personnel interaction with key-management flows are identified and documented.	<report findings="" here=""></report>						
1-5.c Examine the key-management flows and interview personnel to verify:	<report findings="" here=""></report>						
Documentation shows all key-management flows across functions and networks from the point the key is generated through to the point the key is injected into the POI.							
Documentation is kept current and updated as needed upon changes to the KIF architecture							



Control Objective 2: Cryptographic keys used for PIN encryption/decryption and related key management are created using processes that ensure that it is not possible to predict any key or determine that certain keys are more probable than other keys.

Annex B, Control Objective 2 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
Requirement 5: All keys, key components, and key shares must be generated usin	g an approved random or ps	seudo-rar	ndom proc	cess.				
<b>5-1</b> Keys must be generated so that it is not feasible to determine that certain keys are more from the set of all possible keys. Generation of cryptographic keys or key components must must be generated by one of the following:								
<ul> <li>An approved key-generation function of a PCI-approved HSM or POI</li> </ul>								
An approved key-generation function of a FIPS 140-2 Level 3 (or higher) HSM								
<ul> <li>An SCD that has an approved random number generator that has been certified by an i comply with NIST SP 800-22</li> </ul>	ndependent laboratory to							
<b>Note:</b> Random number generation is critical to the security and integrity of all cryptographic key-generation relies upon good quality, randomly generated values.	systems. All cryptographic							
<b>5-1.a</b> Examine key-management policy documentation to verify that it requires that all devices used to generate cryptographic keys meet one of the following	<report findings="" here=""></report>	1	1		1			
<ul> <li>An approved key-generation function of a PCI-approved HSM or POI</li> </ul>								
<ul> <li>An approved key-generation function of a FIPS 140-2 Level 3 (or higher) HSM</li> </ul>								
<ul> <li>An SCD that has an approved random number generator that has been certified by an independent qualified laboratory according to NIST SP 800-22</li> </ul>								
<b>5-1.b</b> Examine certification letters or technical documentation to verify that all devices used to generate cryptographic keys or key components meet one of the following	<report findings="" here=""></report>							
<ul> <li>An approved key-generation function of a PCI-approved HSM or POI</li> </ul>								
<ul> <li>An approved key-generation function of a FIPS 140-2 Level 3 (or higher) HSM</li> </ul>								
<ul> <li>An SCD that has an approved random number generator that has been certified by an independent qualified laboratory according to NIST SP 800-22</li> </ul>								



Annex B, Control Objective 2 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>5-1.c</b> Examine procedures to be used for future generations and logs of past key generations to verify devices used for key generation are those as noted above, including validation of the firmware used.	<report findings="" here=""></report>								
Requirement 6: Compromise of the key-generation process must not be possible without collusion between at least two trusted individuals.									
6-1 Implement security controls, including dual control and tamper detection to prevent the u keys or key components.	inauthorized disclosure of								
6-1 Perform the following:									
<b>6-1.1</b> Any clear-text output of the key-generation process must be managed under dual cont custodian can have direct access to the clear text of any key component/share. Each custod output is limited to the individual component(s)/share(s) assigned to that custodian, and not	lian's access to clear-text								
6-1.1.a Examine documented procedures to verify the following:	<report findings="" here=""></report>			-					
Any key-generation process with clear-text output is performed under dual control.									
<ul> <li>Any output of a clear-text component or share is overseen by only the assigned key custodian(s) for that component/share.</li> </ul>									
<ul> <li>Each custodian's access to clear-text output is limited to the individual component(s)/share(s) assigned to that custodian, and not the entire key.</li> </ul>									
<b>6-1.1.b</b> Observe key-generation process demonstration and interview responsible personnel to verify:	<report findings="" here=""></report>								
Any key-generation process with clear-text output is performed under dual control.									
<ul> <li>Any output of a clear-text component or share is overseen by only the assigned key custodian(s) for that the component/share.</li> </ul>									
<ul> <li>Each custodian's access to clear-text output is limited to the individual component(s)/share(s) assigned to that custodian, and not the entire key.</li> </ul>									



Annex B, Control Objective 2 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<ul> <li>6-1.2 There must be no point in the key-generation process where a single individual has the ability to determine, obtain, or ascertain any part of a clear-text key or all the components for a key.</li> <li>Note: Key shares derived using a recognized secret-sharing algorithm or full-length key components are not considered key parts and do not provide any information regarding the actual cryptographic key.</li> </ul>									
<b>6-1.2.a</b> Examine documented procedures for all key-generation methods and observe demonstrations of the key-generation process from end to end to verify there is no point in the process where a single person has the ability to determine, obtain, or ascertain any part of a clear-text key or all the components for a key.	<report findings="" here=""></report>								
<ul> <li>6-1.2.b Examine key-generation logs to verify that:</li> <li>The documented procedures were followed, and</li> <li>At least two individuals performed the key-generation processes.</li> </ul>	<report findings="" here=""></report>								
<ul> <li>6-1.3 Devices used for generation of clear-text key components that are output in the clear when not in use or require re-authentication whenever key generation is invoked.</li> <li>Logically partitioned devices used concurrently for other processes—e.g., providing servic systems, such as for transaction processing—must have key-generation capabilities disab other activities are continuing.</li> </ul>	es simultaneously to host								
<ul> <li>6-1.3 Examine documented procedures for all key-generation methods. Verify procedures require that:</li> <li>Key-generation devices that generate clear-text key components be powered off when not in use; or require re-authentication whenever key generation is invoked; or</li> <li>If the device used for key generation is logically partitioned for concurrent use in other processes, the key-generation capabilities are enabled for execution of the procedure and disabled when the procedure is complete.</li> </ul>	<report findings="" here=""></report>	1	1						
<b>6-1.4</b> Key-generation equipment used for generation of clear-text key components must not tampering (for example, unknown cables) and must be inspected prior to the initialization of Ensure there isn't any mechanism that might disclose a clear-text key or key component (a between the key-generation device and the device or medium receiving the key or key corr <b>Note:</b> This does not apply to logically partitioned devices located in data centers that are of purposes, such as transaction processing.	of key-generation activities. e.g., a tapping device) mponent.								



Annex B, Control Objective 2 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>6-1.4.a</b> Examine documented procedures for all key-generation methods to verify they include inspections of the key-generation equipment for evidence of tampering, prior to use—including verification that there is a validation step to ensure no unauthorized mechanism exists that might disclose a clear-text key or key component (e.g., a tapping device).	<report findings="" here=""></report>							
<b>6-1.4.b</b> Observe key-generation set-up processes for all key types to verify that key- generation equipment is inspected prior to use, to ensure equipment does not show any signs of tampering—including verification that there is a validation step to ensure no unauthorized mechanism exists that might disclose a clear-text key or key component (e.g., a tapping device).	<report findings="" here=""></report>							
<b>6-1.5</b> Physical security controls must be used to prevent unauthorized personnel from acc generation processes where clear-text keying material is in use. It must not be feasible to material either directly or via camera monitoring.								
<b>6-1.5.a</b> Examine documentation to verify that physical security controls (e.g., partitions or barriers) are defined to ensure the key component cannot be observed or accessed by unauthorized personnel.	<report findings="" here=""></report>	·						
<b>6-1.5.b</b> During the demonstration for 6-1.1.b, observe the physical security controls (e.g., partitions or barriers) used, and validate that they ensure the key-component/key-generation process cannot be observed or accessed by unauthorized personnel directly or via camera monitoring (including those on cellular phones).	<report findings="" here=""></report>							



Annex B, Control Objective 2 PCI PIN Security Requirements		Sum	mary of a	Assessn check on		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>6-2</b> Multi-use/purpose computing systems shall not be used for key generation where any cluor component thereof appears in memory outside the tamper-protected boundary of an SCD For example, it is not permitted for the cryptographic key to be passed through the memory of the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through the memory of the cryptographic key to be passed through th	). of a computer unless it has					
been specifically tasked for the sole purpose of key loading. Computers that have been species solely for key loading are permitted for use if all other requirements can be met, including the the controls defined in Requirement 13 of Annex B.						
Additionally, this requirement excludes from its scope computers used only for administration generation devices that do not have the ability to access clear-text cryptographic keys or contract of the statement						
Single-purpose computers with an installed SCD or a modified PED where clear keying mate a secure port on the key-generating SCD to the target SCD (e.g., a POI device) meet this re components or key pass through memory of the PC, Requirement 13 of Annex B must be m	quirement. Where the					
SCDs used for key generation must meet requirement 5.1						
Note: See Requirements 5 and 13.	1					
<b>6-2.a</b> Examine documented procedures to verify that multi-purpose computing systems are not permitted for key generation where any clear-text secret or private key or component thereof appears in memory outside the tamper-protected boundary of an SCD.	<report findings="" here=""></report>					
<b>6-2.b</b> Observe generation process and examine vendor documentation for each type of key to verify that multi-purpose computing systems are not used for key generation where any clear-text secret or private key or component thereof appears in memory.	<report findings="" here=""></report>					
<b>6-2.c</b> Where single-purpose computers with an installed SCD or a modified PED are used, verify that either:	<report findings="" here=""></report>					
<ul> <li>Clear keying material is injected directly from a secure port on the SCD to the target (e.g., a POI device), or</li> </ul>						
<ul> <li>Where clear keying material passes through memory of the PC, the PC requirements of Requirement 13 of Annex B are met.</li> </ul>						



Annex B, Control Objective 2 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Find (check one)					
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>6-3</b> Key components must be printed within blind mailers or sealed in tamper-evident and au immediately after printing or transcription to ensure that:	thenticable packaging						
<ul> <li>Only approved key custodians can observe the key component.</li> </ul>							
Tampering can be visually detected.							
<ul> <li>Printers used for this purpose must not be used for other purposes, must not be network and must be managed under dual control, including use of a secure room that meets the Annex B.</li> </ul>							
<b>6-3.a</b> Examine documented procedures for printed key components and verify that they require key components to be printed within blind mailers or sealed in tamper-evident and authenticable packaging immediately after printing such that:	<report findings="" here=""></report>						
<ul> <li>Only approved key custodians can observe the key component.</li> </ul>							
Tampering can be detected.							
<ul> <li>Printers used for this purpose are not used for other purposes, are managed under dual control in a secure room that meets the requirements of 32-9 in Annex B, and are not networked.</li> </ul>							
<b>6-3.b</b> Observe processes for printing key components to verify that key components are printed within blind mailers or sealed in tamper-evident and authenticable packaging immediately after printing, such that no one but the authorized custodian ever has physical access to the output and that printers are used only under dual control, only within the secure room that meets the requirements of 32-9 in Annex B, and are not networked.	<report findings="" here=""></report>						
<b>6-3.c</b> Observe blind mailers, tamper-evident and authenticable packaging, or other sealed containers used for key components to verify that components cannot be read from within, and that tampering can be detected.	<report findings="" here=""></report>						



Annex B, Control Objective 2 PCI PIN Security Requirements	Reporting Details: Assessor's Response							
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>6-4</b> Any residue that may contain clear-text keys or components must be destroyed or secur media—immediately after generation of that key, to prevent disclosure of a key or the disclosure an unauthorized individual.								
<ul><li>Examples of where such key residue may exist include (but are not limited to):</li><li>Printing material, including ribbons and paper waste</li></ul>								
<ul> <li>Memory storage of a key-loading device, after loading the key to a different device or sy.</li> <li>Other types of displaying or recording</li> </ul>	stem							
<b>6-4.a</b> Examine documented procedures to identify all locations where key residue may exist. Verify procedures ensure the following:	<report findings="" here=""></report>	·						
<ul> <li>Any residue that may contain clear-text keys or components is destroyed or securely deleted immediately after generation.</li> </ul>								
<ul> <li>Specific direction as to the method of destruction is included in the procedure.</li> </ul>								
<ul> <li>If a key is generated in a separate device before being exported into the end-use device, confirm that the key and all related critical security parameters (e.g., secret seeds) are deleted (zeroized) from the generation and/or injection device(s) immediately after the transfer to the device that will use the key.</li> </ul>								
Examine logs of past destructions and deletions to verify that procedures are followed.								
<b>6-4.b</b> Observe the destruction process of each identified type of key residue and verify the following:	<report findings="" here=""></report>							
<ul> <li>Any residue that may contain clear-text keys or components is destroyed immediately after generation.</li> </ul>								
The method of destruction is consistent with Requirement 24.								
<ul> <li>If a key is generated in a separate device before being exported into the end-use device, confirm that the key and all related critical security parameters (e.g., secret seeds) are deleted (zeroized) from the generation and/or injection device(s) immediately after the transfer to the device that will use the key.</li> </ul>								



Annex B, Control Objective 2 PCI PIN Security Requirements	Reporting Details:								
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
6-5 Asymmetric-key pairs must either be:									
<ul> <li>Generated by the device that will use the key pair; or</li> </ul>									
<ul> <li>If generated externally, the private key of the key pair and all related critical security pair secret seeds) must be deleted (zeroized) immediately after the transfer to the device the</li> </ul>									
<b>6-5.a</b> Examine documented procedures for asymmetric-key generation to confirm that procedures are defined to ensure that asymmetric-key pairs are either:	<report findings="" here=""></report>								
<ul> <li>Generated by the device that will use the key pair, or</li> </ul>									
• If generated externally, the key pair and all related critical security parameters must be deleted (zeroized) immediately after the transfer to the device that will use the key pair.									
6-5.b Observe key-generation processes to verify that asymmetric-key pairs are either:	<report findings="" here=""></report>								
<ul> <li>Generated by the device that will use the key pair, or</li> </ul>									
<ul> <li>If generated externally, the key pair and all related critical security parameters are deleted (for example, zeroized) immediately after the transfer to the device that will use the key pair.</li> </ul>									
<b>6-6</b> Policy and procedures must exist to ensure that clear-text private or secret keys or their transmitted across insecure channels. Preclusions include but are not limited to:	components/shares are not								
Dictating verbally keys or components									
<ul> <li>Recording key or component values on voicemail</li> </ul>									
• Faxing, e-mailing, or otherwise electronically conveying clear-text secret or private keys	or components								
<ul> <li>Conveying clear-text private key shares or secret key components/shares without conta evident and authenticable packaging</li> </ul>	aining them within tamper-								
Writing key or component values into startup instructions									
Affixing (e.g., taping) key or component values to or inside devices									
<ul> <li>Writing key or component values in procedure manuals</li> </ul>									



Annex B, Control Objective 2 PCI PIN Security Requirements	Reporting Details:	Sum		Assessr check on	nent Finc e)	lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>6-6.a</b> Examine documented policy and procedures to verify that they include language that prohibits transmitting clear-text private or secret keys or their components/shares across insecure channels, including but not limited to:	<report findings="" here=""></report>					
Dictating verbally keys or components						
Recording key or component values on voicemail						
• Faxing, e-mailing, or otherwise electronically conveying clear-text keys or components						
<ul> <li>Conveying clear-text private key shares or secret key components/shares without containing them within tamper-evident and authenticable packaging</li> </ul>						
Writing key or component values into startup instructions						
<ul> <li>Affixing key or component values to or inside devices</li> </ul>						
Writing key or component values in procedure manual						
<b>6-6.b</b> From observation of key-management processes verify that clear-text private or secret keys or their components are not transmitted across insecure channels, including but not limited to:	<report findings="" here=""></report>					
Dictating verbally keys or components						
Recording key or component values on voicemail						
• Faxing, e-mailing, or otherwise electronically conveying clear-text keys or components						
<ul> <li>Conveying clear-text private or secret key components without containing them within tamper-evident, authenticable packaging</li> </ul>						
Writing key or component values into startup instructions						
Affixing key or component values to or inside devices						
Writing key or component values in procedure manual						
Requirement 7: Documented procedures must exist and be demonstrably in use for	r all key-generation process	ing.				
7-1 Written key-generation policies and procedures must exist, and all affected parties (key staff, technical management, etc.) must be aware of those procedures. All key-creation ever injection facility must be documented. Procedures for creating all keys must be documented	its performed by a key-					
<b>7-1.a</b> Examine documented key-generation procedures to confirm that they include all aspects of key-generation operations and address all keys in scope.	<report findings="" here=""></report>					
PCI PIN v3.0 Template for Report on Compliance, Rev. 1.0	1				٨ ٨-	arch 20 <sup>-</sup>



Annex B, Control Objective 2 PCI PIN Security Requirements	Reporting Details:	Sum		Assessn check on	n <b>ent Finc</b> e)	lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>7-1.b</b> Interview those responsible for the key-generation processes (including key custodians, supervisory staff, technical management, etc.) to verify that the documented procedures are known and understood by all affected parties.	<report findings="" here=""></report>					
<b>7-1.c</b> Observe key-generation ceremonies whether actual or for demonstration purposes and verify that the documented procedures are demonstrably in use.	<report findings="" here=""></report>					
<b>7-2</b> Logs must exist for the generation of higher-level keys such as KEKs exchanged with ot and BDKs. The minimum log contents include date and time, object name/identifier, purpose individual(s) involved, and tamper-evident package number(s) and serial number(s) of device	e, name and signature of					
<b>7-2.a</b> Examine documented key-generation procedures to verify that all key-generation events for higher-level keys (e.g., KEKs shared with other organizations or otherwise manually loaded as components and MFKs and BDKs) must be logged.	<report findings="" here=""></report>	·	·		•	
<b>7-2.b</b> Observe demonstrations for all types of key-generation events to verify that all key-generation events are logged.	<report findings="" here=""></report>					
<b>7-2.c</b> Examine logs of key generation to verify that exchanges of higher-level keys with other organizations have been recorded and that all required elements were captured.	<report findings="" here=""></report>					



Control Objective 3: Keys are conveyed or transmitted in a secure manner.

Annex B, Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Sum	mary of a	Assessn check one		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place

**Requirement 8:** Secret or private keys must be transferred by:

- a. Physically forwarding the key as at least two separate key shares or full-length components (hard copy, smart card, SCD) using different communication channels, or
- b. Transmitting the key in ciphertext form.

Public keys must be conveyed in a manner that protects their integrity and authenticity.

It is the responsibility of both the sending and receiving parties to ensure these keys are managed securely during transport

Keys conveyed to a key-injection facility must be conveyed in compliance with these requirements. Such keys can include, but are not limited to:

- Derived Unique Key Per Transaction (DUKPT) Base Derivation Keys (BDKs) used in the DUKPT key-management method;
- Key-encryption keys used to encrypt the BDKs when the BDKs are conveyed between entities (e.g., from the BDK owner to a device manufacturer that is performing key-injection on their behalf, or from a merchant to a third party that is performing key-injection on their behalf);
- Terminal master keys (TMKs) used in the master key/session key key-management method;
- PIN-encryption keys used in the fixed-transaction key method;
- Public keys used in remote key-establishment and distribution applications;
- Private asymmetric keys for use in remote key-loading systems.

Keys conveyed **from** a key-injection facility (including facilities that are device manufacturers) must be conveyed in compliance with these requirements. Such keys can include, but are not limited to:

- Digitally signed HSM-authentication public key(s) signed by a device manufacturer's private key and subsequently loaded into the HSM for supporting certain keyestablishment and distribution applications protocols (if applicable);
- Device manufacturer's authentication key loaded into the HSM for supporting certain key-establishment and distribution applications protocols (if applicable).



Annex B, Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Sum	mary of (	Assessm check one		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>8-1</b> Keys must be transferred either encrypted, as two or more full-length clear-text co within an SCD.	omponents, key shares, or					
Clear-text key components/shares must be transferred in SCDs or using tamper-evide packaging.	ent, authenticable					
Where key components are transmitted in clear-text using tamper-evident, authentica	ble mailers:					
<ul> <li>Components/shares must be conveyed using at least two separate communicati different courier services. Components/shares sufficient to form the key must no same communication channel.</li> </ul>						
<ul> <li>Ensure that details of the serial number of the package are conveyed transmitted package itself.</li> </ul>	d separately from the					
<ul> <li>Documented procedures exist and are followed to require that the serial number usage of the keying material.</li> </ul>	s be verified prior to the					
<ul> <li>Where SCDs are used for conveying components/shares, the mechanisms or data (e. component/share from the SCD must be conveyed using a separate communication or must be conveyed in the same manner as a paper component. SCDs must be inspect</li> </ul>	channel from the SCD, or it					
<ul> <li>Where an SCD (i.e,, HSM or KLD) is conveyed with pre-loaded secret and/or private I dual-control mechanisms to become operational. Those mechanisms must not be con communication channel as the SCD. SCDs must be inspected for signs of tampering.</li> </ul>						
<b>Note:</b> Components of encryption keys must be transferred using different communication courier services. It is not sufficient to send key components for a specific key on different communication channel.						
<b>8-1.a</b> Determine whether keys are transmitted encrypted, as clear-text components/shares, or within an SCD.	<report findings="" here=""></report>		1			

Annex B, Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Sum	mary of a	Assessn check on		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>B-1.b</b> If key components are transmitted in clear text using pre-numbered, tamper- evident, authenticable packaging, perform the following:	<report findings="" here=""></report>				1	
<ul> <li>Examine documented procedures for sending components in tamper- evident, authenticable packaging to verify that:</li> </ul>						
<ul> <li>They define how the details of the package serial number are to be transmitted.</li> </ul>						
<ul> <li>There is a requirement that the package serial number is to be sent separately from the package itself.</li> </ul>						
<ul> <li>Each component is to be sent to/from only the custodian(s) authorized for the component.</li> </ul>						
<ul> <li>At least two communication channels are used to send the components of a given key (not just separation by sending on different days).</li> </ul>						
<ul> <li>Prior to the use of the components, the serial numbers are to be confirmed.</li> </ul>						
• Confirm through observation, interview, and inspection of the records of past key transfers that the process used to transport clear-text key components using pre- numbered, tamper-evident, authenticable packaging, is sufficient to ensure:						
<ul> <li>The package serial number was transmitted as prescribed.</li> </ul>						
<ul> <li>The details of the serial number of the package were transmitted separately from the package itself.</li> </ul>						
<ul> <li>At least two communication channels were used to send the components of a given key (not just separation by sending on different days).</li> </ul>						
<ul> <li>Each component was sent to/from only the custodian(s) authorized for the component</li> </ul>						
Prior to the use of the component, the serial number was confirmed.						

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Annex B, Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Sum		Assessn check one	nent Find ∋)	lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
8-1.c Where SCDs are used to convey components/shares,	<report findings="" here=""></report>					
<ul> <li>Examine documented procedures to verify that the mechanism to obtain the keying material (e.g., PIN) is conveyed using separate communication channel from the associated SCD.</li> </ul>						
<ul> <li>Examine documented procedures to verify that the SCD is inspected to ensure that there are not any signs of tampering.</li> </ul>						
<ul> <li>Examine the chain-of-custody document for the SCDs and any transport logs to ensure the movement of each device is tracked and that there is evidence that the SCDs and dual-control mechanisms were separated sufficiently to ensure that no one person gained access to the SCDs and both SCD enablers.</li> </ul>						
<b>8-1.d</b> Where an SCD is conveyed with pre-loaded secret and/or private keys, perform the following:	<report findings="" here=""></report>					
<ul> <li>Examine documented procedures to verify that the SCD requires dual-control mechanisms to become operational.</li> </ul>						
• Examine the documented procedures to ensure the method of shipment of the SCD and dual-control mechanisms (e.g., smart cards or passphrases) are separated in a way that ensures there is no opportunity for one person to gain access to the SCD and both authorization mechanisms (e.g., both smartcards, etc.).						
• Examine documented procedures to verify that the SCD is inspected to ensure there are no signs of tampering.						
<ul> <li>Examine records of key transfers and interview responsible personnel to verify the mechanisms that make the SCD operational are conveyed using separate communication channels.</li> </ul>						



Annex B, Control Objective 3 PCI PIN Security Requirements	Sum		Assessn check one	nent Find ∋)	lings	
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>8-2</b> A person with access to one component or share of a secret or private key, or to the media conveying this value, must not have access to other components or shares of this key or to any other medium containing other components or shares sufficient to form the necessary threshold to derive the key.						
<b>Note:</b> An m-of-n scheme is a component- or share-allocation scheme where m is the number of shares or components necessary to form the key, and n is the number of the total set of shares or components related to the key. Management of the shares or components must be sufficient to ensure that no one person can gain access to enough of the item to form the key alone.						
E.g., in an m-of-n scheme (which must use a recognized secret-sharing scheme such as S key components or shares (i.e., $m = 3$ ) can be used to derive the key, no single individual than two components/shares.						
<b>8-2.a</b> Examine documented procedures to verify they include controls to ensure that no single person can gain access to components or shares of this key or to any other medium containing other components or shares of this key that are sufficient to form the necessary threshold to derive the key. Verify procedures include:	<report findings="" here=""></report>					
<ul> <li>Designation of person(s) permitted to convey/receive keys</li> <li>Reminder that any person with access to one component/share of a key must not have access to other components/shares of this key, or to any other medium conveying any other components or shares sufficient to form the necessary threshold to derive the key.</li> </ul>						
• Steps to ensure any person with access to the media conveying a component/share of a key could not have access to other components/shares of this key, or to any other medium conveying any other component of this key that is sufficient to form the necessary threshold to derive the key without detection.						

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Annex B, Control Objective 3 PCI PIN Security Requirements and Test Procedures	Reporting Details:	Sum	mary of (	Assessn check one		lings
	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>8-2.b</b> Observe key-transfer processes and interview personnel to verify that controls are implemented to ensure that no single person can gain access to components or shares of this key or to any other medium containing other components or shares of this key that are sufficient to form the necessary threshold to derive the key. Verify the implemented controls ensure the following:	<report findings="" here=""></report>					
<ul> <li>Only designated custodians can send/receive the component or share.</li> </ul>						
• There is a clear understanding that an individual with access to a key component or key share does not have access to other components/shares of this key or to any other medium conveying other components or shares of this key that are sufficient to form the necessary threshold to derive the key.						
• There is sufficient evidence to show that a person with access to the media conveying a key component or key share could not have access to other components/shares of this key or to any other medium conveying any other components or shares of this key that are sufficient to form the necessary threshold to derive the key without detection.						
<b>8-2.c</b> Examine records of past key transfers to verify that the method used did not allow for any personnel to have access to components or shares sufficient to form the key.	<report findings="" here=""></report>					
<b>8-3</b> E-mail shall not be used for the conveyance of secret or private keys or their compone encrypted, unless the key (or component/share) has already been encrypted in accordance i.e., in an SCD. This is due to the existence of these key values in memory just prior to ence decryption. In addition, corporate e-mail systems allow the recovery by support staff of the text or files conveyed through those systems.	e with these requirements— cryption or subsequent to clear text of any encrypted					
Other similar mechanisms, such as SMS, fax, or telephone shall not be used to convey cle	ear-text key values.					
<b>8-3</b> Validate through interviews, observation, and log inspection that e-mail, SMS, fax, or telephone or similar communication is not used as means to convey secret or private keys or key components/shares.	<report findings="" here=""></report>					



Annex B, Control Objective 3 PCI PIN Security Requirements and Test Procedures	Reporting Details:	Sum		Assessn check on	n <b>ent Find</b> e)	lings
	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<ul> <li>8-4 Public keys must be conveyed in a manner that protects their integrity and authenticity Examples of acceptable methods include:</li> <li>Use of public-key certificates as defined in Annex A that are created by a trusted CA t of Annex A.</li> <li>Validating a hash of the public key sent by a separate channel (for example, mail)</li> <li>Using a MAC (message authentication code) created using the algorithm defined in <i>IS</i>.</li> <li>Conveyance within an SCD</li> <li>Encrypted</li> <li>Note: Self-signed certificates must not be used as the sole method of authentication.</li> <li>Self-signed root certificates protect the integrity of the data within the certificate but do not the data. The authenticity of the root certificate is based on the use of secure procedures to Specifically, they must be directly installed into the PIN pad of the ATM or POS device and device subsequent to manufacture.</li> </ul>	hat meets the requirements SO 16609 guarantee the authenticity of o distribute them.					
8-4 For all methods used to convey public keys, perform the following:						
<ul> <li>8-4.a Examine documented procedures for conveying public keys to verify that methods are defined to convey public keys in a manner that protects their integrity and authenticity such as:</li> <li>Use of public-key certificates created by a trusted CA that meets the requirements of Annex A</li> <li>Validation of a hash of the public key sent by a separate channel (for example, mail)</li> <li>Using a MAC (message authentication code) created using the algorithm defined in <i>ISO 16609</i></li> <li>Conveyance within an SCD</li> <li>Encrypted</li> </ul>	<report findings="" here=""></report>					
<b>8-4.b</b> Validate that procedures dictate that self-signed certificates must not be used as the sole method of authentication.	<report findings="" here=""></report>					



Annex B, Control Objective 3 PCI PIN Security Requirements and Test Procedures	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>8-4.c</b> Observe the process for conveying public keys, associated logs, and interview responsible personnel to verify that the implemented method ensures public keys are conveyed in a manner that protects their integrity and authenticity.	<report findings="" here=""></report>		11	1	1	1		

**Requirement 9:** During its transmission, conveyance, or movement between any two locations or organizational entities, any single unencrypted secret or private key component or share must at all times be protected.

Sending and receiving location/entities are equally responsible for the physical protection of the materials involved.

Key components/shares conveyed to and from a key-injection facility must be conveyed in compliance with these requirements. Such key components/shares include but are not limited to those for key-encryption keys used to encrypt the BDKs when the BDKs are conveyed between entities (e.g., from the BDK owner to a device manufacturer that is performing key-injection on their behalf, or from a merchant to a third party that is performing key-injection on their behalf), or key components for the BDKs themselves, and terminal master keys used in the master key/session key key-management method. These requirements also apply to keys moved between locations of the same organization.

<b>9-1</b> During the process to convey it, any single clear-text secret or private key component/share must either:	at all times be			
Under the continuous supervision of a person with authorized access to this component,				
<ul> <li>Sealed in a security container or courier mailer (including pre-numbered, tamper-evident, authen in such a way that it can be obtained only by a person with authorized access to it and unauthoriz be detected, or</li> </ul>				
Contained within a physically secure SCD.				
<b>Note:</b> No single person shall be able to access or use all components or a quorum of shares of a sing private cryptographic key.	gle secret or			
<b>9-1.a</b> Examine documented procedures for transmission, conveyance, or movement of keys between any two locations to verify that any single clear-text key component must at all times be either:	Findings Here>			
<ul> <li>Under the continuous supervision of a person with authorized access to this component, or</li> </ul>				

- Sealed in a security container or courier mailer (including pre-numbered, tamperevident, authenticable packaging) in such a way that it can be obtained only by a person with authorized access to it, or
- Contained within a physically secure SCD.



Annex B, Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Sum	mary of <i>i</i> (c	Assessn check one		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>9-1.b</b> Observe key-management processes, examine associated logs, and interview responsible personnel to verify processes are implemented to ensure that any single clear-text key component is at all times either:	<report findings="" here=""></report>		· · · · ·			
<ul> <li>Under the continuous supervision of a person with authorized access to this component, or</li> </ul>						
<ul> <li>Sealed in a security container or courier mailer (including pre-numbered, tamper- evident, authenticable packaging) in such a way that it can be obtained only by a person with authorized access to it, or</li> </ul>						
Contained within a physically secure SCD.						
<b>9-2</b> Packaging or mailers (i.e., pre-numbered, tamper-evident packaging) containing clear- examined for evidence of tampering before being opened. Any sign of package tampering potentially compromised must be assessed and the analysis formally documented. If comp result is that one person could have knowledge of the key, it must result in the destruction	indicating a component was promise is confirmed, and the					
The set of components						
Any keys encrypted under this (combined) key	1					
<b>9-2.a</b> Verify documented procedures include requirements for all packaging or mailers containing clear-text key components to be examined for evidence of tampering before being opened.	<report findings="" here=""></report>					
<b>9-2.b</b> Interview responsible personnel and observe processes to verify that all packaging or mailers containing clear-text key components are examined for evidence of tampering before being opened.	<report findings="" here=""></report>					
<b>9-2.c</b> Verify documented procedures require that any sign of package tampering is identified, reported and ultimately results in the destruction and replacement of both:	<report findings="" here=""></report>					
The set of components						
Any keys encrypted under this (combined) key						



Annex B, Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Assessn check one	<b>nent Findings</b> e)			
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>9-2.d</b> Interview responsible personnel and observe processes to verify that, if a package shows signs of tampering indicating a component was potentially compromised, processes are implemented to identify the tampering, report/escalate it, and ultimately result in the destruction and replacement of both:	<report findings="" here=""></report>					
The set of components						
Any keys encrypted under this (combined) key.						
<b>9-2.e</b> Examine records related to any escalated transmittal event. Verify that it resulted in the destruction and replacement of both:	<report findings="" here=""></report>					
The set of components						
<ul> <li>Any keys encrypted under this (combined) key</li> </ul>						
<b>9-3</b> Only an authorized key custodian—and designated backup(s)—shall have physical ac prior to being secured in transmittal packaging and upon removal of a secured key compor packaging.						
<b>9-3.a</b> Verify that a list(s) of key custodians—and designated backup(s)—authorized to have physical access to key components prior to being secured in transmittal packaging and upon removal of a secured key component from transmittal packaging.	<report findings="" here=""></report>		·			
<b>9-3.b</b> Observe implemented access controls and processes to verify that only those authorized key custodians—and designated backup(s)—have physical access to key components prior to being secured in transmittal packaging and upon removal of a secured key component from transmittal packaging.	<report findings="" here=""></report>					
<b>9-3.c</b> Examine physical access logs (e.g., to security containers for key components) to verify that only the authorized individual(s) have access to each component.	<report findings="" here=""></report>					
9-4 Mechanisms must exist to ensure that only authorized custodians:						
• Place key components into pre-numbered, tamper-evident, authenticable packaging for	or transmittal.					
<ul> <li>Check tamper-evident packaging upon receipt for signs of tamper prior to opening the authenticable packaging containing key components.</li> </ul>	e tamper-evident,					
Check the serial number of the tamper-evident packing upon receipt of a component packing upon re	backage.					



Annex B, Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Assessn check on	s <b>ment Findings</b> one)			
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>9-4.a</b> Verify that a list(s) of key custodians authorized to perform the following activities is defined and documented:	<report findings="" here=""></report>					
<ul> <li>Place the key component into pre-numbered, tamper-evident packaging for transmittal.</li> </ul>						
<ul> <li>Upon receipt, check the tamper-evident packaging for signs of tamper prior to opening the tamper-evident packaging containing the key component.</li> </ul>						
<ul> <li>Check the serial number of the tamper-evident packing upon receipt of a component package.</li> </ul>						
<b>9-4.b</b> Observe implemented mechanisms and processes and examine logs to verify that only the authorized key custodians can perform the following:	<report findings="" here=""></report>					
<ul> <li>Place the key component into pre-numbered, tamper-evident packaging for transmittal.</li> </ul>						
<ul> <li>Upon receipt, check the tamper-evident packaging for signs of tamper prior to opening the tamper-evident packaging containing the key component.</li> </ul>						
• Check the serial number of the tamper-evident packing upon receipt of a component package.						
<b>9-5</b> Pre-numbered, tamper-evident, authenticable bags shall be used for the conveyance of not in an SCD. Out-of-band mechanisms must be used to verify receipt of the appropriate						
Note: Numbered courier bags are not sufficient for this purpose						
<b>9-5</b> Verify that pre-numbered, tamper-evident, authenticable bags are used for the conveyance of clear-text key components and perform the following:	<report findings="" here=""></report>					
<ul> <li>Examine documented procedures to verify they define how details of the serial number are transmitted separately from the package itself.</li> </ul>						
<ul> <li>Observe the method used to transport clear-text key components using tamper- evident mailers, and interview responsible personnel to verify that details of the serial number of the package are transmitted separately from the package itself.</li> </ul>						
<ul> <li>Examine logs to verify that procedures are followed.</li> </ul>						



Annex B, Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Sum		Assessm check one	nent Find ∋)	ings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>9-6</b> If components or shares of multiple keys are being sent simultaneously between the sa custodians, the component/shares for a specific custodian or custodian group can be shipp provided that:						
<ul> <li>The components inside the tamper-evident and authenticable package are in separate packaging (e.g., individually sealed within labeled, opaque envelopes or PIN mailers) inadvertent observation when the package is opened.</li> </ul>						
<ul> <li>The components are repackaged at receipt into separate tamper-evident and authenti at the receiving location.</li> </ul>	cable packages for storage					
Records reflect the receipt of the shipped bag and association with subsequent individ	lual bags.					
<b>9-6.a</b> If components or shares of multiple keys are being sent simultaneously between the same sending and receiving custodians, the component/shares for a specific custodian or custodian group can be shipped in the same TEA bag provided that:	<report findings="" here=""></report>					
<ul> <li>The components inside the tamper-evident and authenticable package are in separate opaque and identifiable packaging (e.g., individually sealed within labeled, opaque envelopes or within PIN mailers) to prevent confusion and/or inadvertent observation when the package is opened.</li> </ul>						
<ul> <li>The components are repackaged at receipt into separate tamper-evident and authenticable packages for storage at the receiving location.</li> </ul>						
<ul> <li>Records reflect the receipt of the shipped bag and association with subsequent individual bags.</li> </ul>						
<b>9-6.b</b> Examine logs to verify that procedures are followed.	<report findings="" here=""></report>					



Annex B, Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Sum	mary of (	Assessm check one		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place

**Requirement 10:** All key-encryption keys used to transmit or convey other cryptographic keys must be at least as strong as any key transmitted or conveyed.

Key-encryption keys used to convey keys to a key-injection facility or between locations or systems within the same key-injection facility must be at least as strong as any key transmitted or conveyed. Such keys include but are not limited to, key-encryption keys used to encrypt the BDKs when the BDKs are conveyed between entities, locations, or systems (e.g., from the BDK owner to a device manufacturer that is performing key-injection on their behalf, or from a merchant to a third party that is performing key-injection on their behalf) for system migration, or transport between injection locations owned by the same organization.

<b>10-1</b> All key-encryption keys used to encrypt for transmittal or conveyance of other cryptographic keys must be at least as strong as the key being sent, as delineated in Annex C except as noted below for RSA keys used for key transport.				
<ul> <li>TDEA keys used for encrypting keys must be at least double-length keys (have bit stre TDEA in an encrypt, decrypt, encrypt mode of operation for key-encipherment.</li> </ul>	ength of 80 bits) and use the			
A double- or triple-length TDEA key must not be encrypted with a TDEA key of a lesser	r strength.			
<ul> <li>TDEA keys shall not be used to protect AES keys.</li> </ul>				
<ul> <li>TDEA keys shall not be used to encrypt keys greater in strength than 112 bits.</li> </ul>				
• RSA keys used to transmit or convey other keys must have bit strength of at least 80 b	vits.			
RSA keys encrypting keys greater in strength than 80 bits shall have bit strength at lease	st 112 bits.			
<b>Note:</b> Entities that are in the process of migrating from older devices to PCI devices approv higher of the PCI POI Security Requirements—and thus have a mixed portfolio of devices— sizes less than 2048 and use SHA-1 to help facilitate the migration. However, in all cases, w must implement RSA using key sizes of 2048 or higher and SHA-2 when used for key distri- techniques in accordance with Annex A.	–they may use RSA key version 3 or higher devices			
<b>10-1.a</b> Examine documented procedures to verify there is a requirement that all keys used to transmit or convey other cryptographic keys must be at least as strong as any key transmitted or conveyed except as noted for RSA keys	<report findings="" here=""></report>			

key transmitted or conveyed, except as noted for RSA keys.	
<b>10-1.b</b> Using the network schematic and the summary listing of cryptographic keys and through interview of personnel, identify keys that protect other keys for transmission. Consider keys manually transferred (e.g., cryptograms sent to an ESO) as well as those that are system generated and transferred (e.g., KEK or TMK encrypting working keys).	<report findings="" here=""></report>



Annex B, Control Objective 3 PCI PIN Security Requirements	Reporting Details:	Sum		Assessn check on	n <b>ent Find</b> e)	lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>IO-1.c</b> Observe key-generation processes for the key types identified above. Verify that all keys used to transmit or convey other cryptographic keys are at least as strong as any key transmitted or conveyed except as noted for RSA keys.	<report findings="" here=""></report>				1	
<ul> <li>Interview appropriate personnel and examine documented procedures for the creation of these keys.</li> </ul>						
• Using the table in Annex C, validate the respective key sizes for TDEA, RSA, Elliptic Curve, DSA, and Diffie Hellman algorithms where used for key encryption.						
Verify that:						
<ul> <li>TDEA keys used for encrypting keys must be at least double-length keys (have bit strength of 80 bits) and use the TDEA in an encrypt, decrypt, encrypt mode of operation for key-encipherment.</li> </ul>						
<ul> <li>A double- or triple-length TDEA key must not be encrypted with a TDEA key of lesser strength.</li> </ul>						
<ul> <li>TDEA keys are not used to protect AES keys.</li> </ul>						
<ul> <li>TDEA keys shall not be used to encrypt keys greater in strength than 112 bits.</li> </ul>						
<ul> <li>RSA keys used to transmit or convey other keys have bit strength of at least 80 bits.</li> </ul>						
<ul> <li>RSA keys encrypting keys greater in strength than 80 bits have bit strength at least 112 bits.</li> </ul>						
<ul> <li>Any POI device that is version 3 or higher is using RSA with a key size of at least 2048 and SHA-2, where applicable. Use as necessary the device information used in Requirement 1.</li> </ul>						
<b>10-1.d</b> Examine system documentation and configuration files to validate the above, including HSM settings.	<report findings="" here=""></report>					
Requirement 11: Documented procedures must exist and be demonstrably in	use for all key transmission	and conv	eyance p	rocessing	g.	
11-1 Written procedures must exist and be known to all affected parties.						



PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>11-1.a</b> Verify documented procedures exist for all key transmission and conveyance processing.	<report findings="" here=""></report>				·				
<b>11-1.b</b> Interview responsible personnel to verify that the documented procedures are known and understood by all affected parties for key transmission and conveyance processing.	<report findings="" here=""></report>								
<b>11-2</b> Methods used for the conveyance or receipt of keys must be documented.									
<b>11-2</b> Verify documented procedures include all methods used for the conveyance or receipt of keys.	<report findings="" here=""></report>								



Control Objective 4: Key-loading to HSMs and POI PIN-acceptance devices is handled in a secure manner.

Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)					
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place	

**Requirement 12:** Secret and private keys must be input into hardware (host) security modules (HSMs) and POI PIN-acceptance devices in a secure manner.

a. Unencrypted secret or private keys must be entered using the principles of dual control and split knowledge. b. Key-establishment techniques using public-key cryptography must be implemented securely.

Key-injection facilities must load keys using dual control and for clear-text secret and private keys, split knowledge. Such keys include, but are not limited to:

- Derived Unique Key Per Transaction (DUKPT) Base Derivation Keys (BDKs) used in the DUKPT key-management method;
- Key-encryption keys used to encrypt the BDKs when the BDKs are conveyed between entities (e.g., from the BDK owner to a device manufacturer that is performing key-injection on their behalf, or from a merchant to a third party that is injecting keys on their behalf);
- Terminal master keys (TMKs) used in the master key/session key key-management method;
- PIN-encryption keys used in the fixed-transaction key method;
- Master keys for key-injection platforms and systems that include hardware devices (SCDs) for managing (e.g., generating and storing) the keys used to encrypt other keys for storage in the key-injection platform system;
- Public and private key pairs loaded into the POIs for supporting remote key-establishment and distribution applications;
- Digitally signed POI public key(s) signed by a device manufacture's private key and subsequently loaded into the POI for supporting certain key-establishment and distribution applications protocols (if applicable). Dual control is not necessary where other mechanisms exist to validate the authenticity of the key, such as the presence in the device of an authentication key;
- Device manufacturer's authentication key (e.g., vendor root CA public key) loaded into the POI for supporting certain key-establishment and distribution applications protocols (if applicable).

<ul><li>12-1 The loading of secret or private keys, when loaded from the individual key components the principles of dual control and split knowledge.</li><li>Note: Manual key loading may involve the use of media such as paper, smart cards, or other secret cards.</li></ul>				
<b>12-1.a</b> Using the summary of cryptographic keys, identify keys that are loaded from components and examine documented process to load each key type (MFK, TMK, PEK, etc.) from components to ensure dual control and split knowledge are required.	<report findings="" here=""></report>			
<b>12-1.b</b> Interview appropriate personnel to determine the number of key components for each manually loaded key.	<report findings="" here=""></report>			



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>12-1.c</b> Witness a structured walk-through/demonstration of various key-loading processes for all key types (MFKs, TMKs, PEKs. etc.). Verify the number and length of the key components against information provided through verbal discussion and written documentation.	<report findings="" here=""></report>		-			-		
<b>12-1.d</b> Verify that the process includes the entry of individual key components by the designated key custodians.	<report findings="" here=""></report>							
12-1.e Ensure key-loading devices can only be accessed and used under dual control.	<report findings="" here=""></report>							
<b>12-2</b> Procedures must be established that will prohibit any one person from having access to form an encryption key when components are removed from and returned to storage for key	-							
<b>12-2</b> Examine logs of access to security containers for key components/shares to verify that only the authorized custodian(s) have accessed. Compare the number on the current tamper-evident and authenticable package for each component to the last log entry for that component.	<report findings="" here=""></report>							
Trace historical movement of higher-order keys (MFK, KEK, and BDK) in and out of secure storage to ensure there is no break in the package-number chain that would call into question authorized handling and sufficient storage of the component or share. This must address at a minimum the time frame from the date of the prior audit.								



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>12-3</b> The loading of clear-text cryptographic keys using a key-loading device requires dual or loading session. It shall not be possible for a single person to use the key-loading device to								
Dual control must be implemented using one or more of, but not limited to, the following tec	hniques:							
• Two or more passwords/authentication codes of five characters or more (vendor defau	It values must be changed),							
<ul> <li>Multiple cryptographic tokens (such as smartcards), or physical keys,</li> </ul>								
Physical access controls								
<ul> <li>Separate key-loading devices for each component/share</li> </ul>								
Note that for devices that do not support two or more passwords/authentication codes, this splitting the single password used by the device into two halves, each half controlled by a s custodian. Each half must be a minimum of five characters.								
Note that passwords/authentication codes to the same object may be assigned to a custodi custodian team for component A.	an group team—e.g.,							
<b>Note:</b> The addition of applications that replace or disable the PCI-evaluated firmware function device approval for each such implementation unless those applications are validated for consecurity Requirements and listed as such in the approval listings.	-							
<b>12-3.a</b> Identify instances where a key-loading device is used to load clear-text keys. Examine documented procedures for loading of clear-text cryptographic keys, including public keys, to verify:	<report findings="" here=""></report>				1			
<ul> <li>Procedures require dual control to authorize any key-loading session.</li> </ul>								
<ul> <li>The techniques to be used to achieve dual control are identified.</li> </ul>								
<ul> <li>There is a requirement to change any default passwords/authentication codes and set passwords/authentication codes that have at least five characters.</li> </ul>								
<ul> <li>There is a requirement that if passwords/authentication codes or tokens are used, they be maintained separately.</li> </ul>								



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>12-3.b</b> For each types of production SCDs loaded with a key-loading device, observe the processes (e.g., a demonstration) of loading clear-text cryptographic keys and interview personnel. Verify that:	<report findings="" here=""></report>							
<ul> <li>Dual control is necessary to authorize the key-loading session.</li> </ul>								
Expected techniques are used.								
<ul> <li>Default passwords/authentication codes are reset.</li> </ul>								
<ul> <li>Any passwords/authentication codes used are a minimum of five characters.</li> </ul>								
Any passwords/authentication codes or tokens are maintained separately.								
<b>12-3.c</b> Examine documented records of key-loading to verify the presence of two authorized persons during each type of key-loading activity.	<report findings="" here=""></report>							
<b>12-3.d</b> Ensure that any default dual-control mechanisms (e.g., default passwords/authentication codes—usually printed in the vendor's manual—in a keyloading device) have been disabled or changed.	<report findings="" here=""></report>							
<b>12-4</b> Key components for symmetric keys must be combined using a process such that no determined without knowledge of the remaining components. (For example, via XOR'ing or								
Note that concatenation of key components together to form the key is unacceptable; e.g., hexadecimal character halves to form a 16-hexadecimal secret key.	concatenating two 8-							
The resulting key must only exist within the SCD.								
<b>12-4.a</b> Examine documented procedures for combining symmetric key components and observe processes to verify that key components are combined using a process such that no active bit of the key can be determined without knowledge of the remaining components—e.g. only within an SCD.	<report findings="" here=""></report>					<u> </u>		
<b>12-4.b</b> Confirm key-component lengths through interview and examination of blank component forms and documented procedures. Examine device configuration settings and interview personnel to verify that key components used to create a key are the same length as the resultant key.	<report findings="" here=""></report>							
<b>12-5</b> Hardware security module (HSM) Master File Keys, including those generated internates exported, must be at least double-length keys and use the TDEA (including parity bits) or A least 128 bits.								



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>12-5</b> Examine vendor documentation describing options for how the HSM MFK is created and verify the current MFK was created using AES or double- or triple-length TDEA. Corroborate this via observation of processes, with information gathered during the interview process, and procedural documentation provided by the entity under review.	<report findings="" here=""></report>							
<b>12-6</b> Any other SCD loaded with the same key components must combine all entered key or identical process.	components using the							
<b>12-6</b> Through examination of documented procedures, interviews, and observation, confirm that any devices that are loaded with the same key components use the same mathematical process to derive the final key.	<report findings="" here=""></report>	-				-		
<b>12-7</b> The initial terminal master key (TMK) or initial DUKPT key must be loaded to the devic key-loading techniques or manual techniques—e.g., the device keypad, IC cards, key-load loading of the terminal master key may use techniques described in this document such as	ing device, etc. Subsequent							
Asymmetric techniques								
Manual techniques								
<ul> <li>The existing TMK to encrypt the replacement TMK for download</li> </ul>								
<ul> <li>For AES DUKPT, using the option to derive a key-encryption key called the DUKPT Up can send a device a new initial key encrypted under that key. Note this also requires the also sent.</li> </ul>								
Keys shall not be reloaded by any methodology in the event of a compromised device and use.	must be withdrawn from							
<b>12-7.a</b> Examine documented procedures for the loading of TMKs and initial DUKPT keys to verify that they require asymmetric key-loading techniques or manual techniques for initial loading and allowed methods for replacement TMK or initial DUKPT key loading.	<report findings="" here=""></report>							
<b>12-7.b</b> Examine documented procedures to verify that keys are withdrawn from use if they were loaded to a device that has been compromised or went missing.	<report findings="" here=""></report>							



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>12-8</b> If key-establishment protocols using public-key cryptography are used to distribute set the requirements detailed in Annex A of this document. For example:	cret keys, these must meet							
A public-key technique for the distribution of symmetric secret keys must:								
<ul> <li>Use public and private key lengths that are in accordance with Annex C for the algorith bits minimum for RSA).</li> </ul>	m in question (e.g., 1024-							
• Use key-generation techniques that meet the current ANSI and ISO standards for the a	algorithm in question.							
Provide for mutual device authentication for both the host and the POI device or host-to-host if applicable, including assurance to the host that the POI device has (or can compute) the session key and that no entity other than the POI device specifically identified can possibly compute the session key.								
<b>12-8.a</b> For techniques involving public key cryptography, examine documentation to illustrate the process, including the size and sources of the parameters involved, and the mechanisms utilized for mutual device authentication for both the host and the POI.	<report findings="" here=""></report>							
<b>12-8.b</b> If key-establishment protocols using public-key cryptography are used to distribute secret keys, verify that the remote key-distribution requirements detailed in Annex A of this document are met, including:	<report findings="" here=""></report>							
<ul> <li>Use of public and private key lengths that are in accordance with Annex C for the algorithm in question (e.g., 1024-bits minimum for RSA).</li> </ul>								
<ul> <li>Use of key-generation techniques that meet the current ANSI and ISO standards for the algorithm in question.</li> </ul>								
<ul> <li>Providing for mutual device authentication for both the host and the POI device or host-to-host if applicable.</li> </ul>								



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Sum	nmary of a	Assessn heck on		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>12-9</b> Key-injection facilities must implement dual control and split-knowledge controls for th devices (for example, POIs and other SCDs).	e loading of keys into					
<ul> <li>Note: Such controls may include but are not limited to:</li> <li>Physical dual access controls that electronically provide for restricted entry and egress key injection such that the badge-access system enforces the presence of at least two times in the room so no one person can singly access the key-loading equipment. Acces appropriate personnel involved in the key-loading process.</li> </ul>	authorized individuals at all					
<ul> <li>Logical dual control via multiple logins with unique user IDs to the key-injection platform one person can operate the application to singly inject cryptographic keys into devices.</li> </ul>	application such that no					
<ul> <li>Key-injection platform applications that force the entry of multiple key components and procedures that involve multiple key custodians who store and access key components split-knowledge mechanisms.</li> </ul>	-					
<ul> <li>Demonstrable procedures that prohibit key custodians from handing their components to key entry.</li> </ul>	o any other individual for					
Separate key-loading devices for each component						
<b>12-9.a</b> Examine documented key-injection procedures to verify that the procedures define use of dual control and split knowledge controls for the loading of keys into devices.	<report findings="" here=""></report>					
<b>12-9.b</b> Interview responsible personnel and observe key-loading processes and controls to verify that dual control and split-knowledge controls are in place for the loading of keys into devices.	<report findings="" here=""></report>					
<b>12-9.c</b> Examine records of key-loading processes and controls to verify that the loading of keys does not occur without dual control and split knowledge.	<report findings="" here=""></report>					



The mechanisms used to load secret and private keys—such as terminals, external PIN pads, key guns, or similar devices and Requirement 13: methods-must be protected to prevent any type of monitoring that could result in the unauthorized disclosure of any component.

Key-injection facilities must ensure key-loading mechanisms are not subject to disclosure of key components or keys.

Some key-injection platforms use personal-computer (PC)-based software applications, whereby clear-text secret and/or private keys and/or their components exist in memory outside the secure boundary of an SCD for loading keys. Such systems have inherent weaknesses that, if exploited, may cause the unauthorized disclosure of components and/or keys. These weaknesses include:

- XOR'ing of key components is performed in software. •
- Clear-text keys and components can reside in software during the key-loading process. .
- Some systems require only a single password. .
- Some systems store the keys (e.g., BDKs, TMKs) on removable media or smart cards. These keys are in the clear with some systems.
- PCs, by default, are not managed under dual control. Extra steps (e.g., logical user IDs, physical access controls, etc.) must be implemented to prevent single • control of a PC.
- Data can be recorded in the PC's non-volatile storage.
- Software Trojan horses or keyboard sniffers can be installed on PCs.

13-1 Clear-text secret and private keys and key components must be transferred into an SCD only when it can be ensured that:			
<ul> <li>Any cameras present in the environment must be positioned to ensure they cannot monitor the entering of clear- text key components.</li> </ul>			
• There is not any mechanism at the interface between the conveyance medium and the SCD that might disclose the transferred keys.			
• The sending and receiving SCDs must be inspected prior to key loading to ensure that they have not been subject to any prior tampering or unauthorized modification that could lead to the disclosure of clear-text keying materials.			
<ul> <li>SCDs must be inspected to detect evidence of monitoring and to ensure dual-control procedures are not circumvented during key loading.</li> </ul>			
<ul> <li>An SCD must transfer a plaintext secret or private key only when at least two authorized individuals are uniquely identified by the device.</li> </ul>			

Not in

Place

Annex B, Control Objective 4	Reporting Details:	Summary of Assessment Findings (check one)						
PCI PIN Security Requirements and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>13-1</b> Observe key-loading environments, processes, and mechanisms (for example, terminals, PIN pads, key guns, etc.) used to transfer keys and key components. Perform the following:	<report findings="" here=""></report>		1	1	1			
<ul> <li>Ensure that any cameras that are present are positioned to ensure they cannot monitor the entering of clear-text key components.</li> </ul>								
• Examine documented procedures to determine that they require that keys and components are transferred into an SCD only after an inspection of the devices and mechanism; and verify they are followed by observing a demonstration that:								
<ul> <li>SCDs must be inspected to detect evidence of monitoring and to ensure dual- control procedures are not circumvented during key loading.</li> </ul>								
<ul> <li>An SCD must transfer a plaintext secret or private key only when at least two authorized individuals are identified by the device.</li> </ul>								
<ul> <li>There is not any mechanism (including cabling) at the interface between the conveyance medium and the SCD device that might disclose the transferred keys.</li> </ul>								
<ul> <li>The SCD is inspected to ensure it has not been subject to any prior tampering or unauthorized modification that could lead to the disclosure of clear-text keying material.</li> </ul>								
<b>13-2</b> Only SCDs shall be used in the loading of clear-text secret or private keys or their con secure key-loading facility, as delineated in the requirements in this Annex. For example, A keyboards or those attached to an HSM shall never be used for the loading of clear-text secomponents.	TM controller (computer)							
<b>Note:</b> The addition of applications—e.g., component, share, or key-loading applications—the PCI evaluated firmware functionality invalidates the device approval for each such implement applications are validated for compliance to PTS POI Security Requirements and listed as	entation unless those							
<b>13-2.a</b> Examine documentation to verify that only SCDs are used in the loading of clear- text secret or private keys or their components, outside of a secure key-loading facility, as delineated in this Annex. For example, ATM keyboards or keyboards attached to an HSM shall never be used for the loading of clear-text secret or private keys or their components.	<report findings="" here=""></report>		1	1	1	1		

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Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)							
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>13-2.b</b> Observe a demonstration of key loading to verify that only SCDs are used in the loading of clear-text secret or private keys or their components outside of a secure key-loading facility.	<report findings="" here=""></report>								
<b>13-3</b> The loading of plaintext secret or private key components or shares from an electronic medium—e.g., smart card, thumb drive, fob or other devices used for data transport—directly into a cryptographic device (and verification of the correct receipt of the component, if applicable) results in either of the following:									
• The medium is placed into secure storage and managed under dual control (only if there is a possibility it will be required for future re-loading of the component into the cryptographic device); or									
<ul> <li>All traces of the component are erased or otherwise destroyed from the electronic med Requirement 24.</li> </ul>	dium in accordance with								
<b>13-3.a</b> Examine documented procedures for the loading of secret or private key components from an electronic medium to a cryptographic device. Verify that procedures define specific instructions to be followed as a result of key loading, including:	<report findings="" here=""></report>			-					
<ul> <li>Instructions for the medium to be placed into secure storage and managed under dual control (only if there is a possibility it will be required for future re-loading of the component into the cryptographic device); or</li> </ul>									
<ul> <li>Instructions to erase or otherwise destroy all traces of the component from the electronic medium, including the method to use.</li> </ul>									
<b>13-3.b</b> Observe key-loading processes to verify that the loading process results in one of the following:	<report findings="" here=""></report>								
<ul> <li>The medium used for key loading is placed into secure storage and managed under dual control (only if there is a possibility it will be required for future re-loading of the component into the cryptographic device); or</li> </ul>									
<ul> <li>All traces of the component are erased or otherwise destroyed from the electronic medium.</li> </ul>									
13-3.c Examine records/logs of erasures to confirm that:	<report findings="" here=""></report>								
The documented procedure was followed.									
<ul> <li>The method used was in accordance with Requirement 24.</li> </ul>									



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>13-4</b> For secret or private keys transferred from the cryptographic hardware that generated key-loading device:	the key to an electronic							
<b>13-4</b> Examine documented procedures and observe processes for the use of key-loading devices. Perform the following:	<report findings="" here=""></report>							
<b>13-4.1</b> The key-loading device must be a physically secure SCD, designed and implement unauthorized disclosure of the key is prevented or detected. <b>Note:</b> A PCI-approved KLD meets this requirement for a SCD.	nted in such a way that any							
<b>13-4.1</b> Verify the key-loading device is a physically secure SCD designed and implemented in such a way that any unauthorized disclosure of the key is prevented or detected.	<report findings="" here=""></report>				1	1		
<b>13-4.2</b> The key-loading device must be under the supervision of a person authorized by r secure container such that no unauthorized person can have access to it.	nanagement or stored in a							
<b>13-4.2</b> Verify the key-loading device is under the supervision of a person authorized by management or stored in a secure container such that no unauthorized person can have access to it.	<report findings="" here=""></report>	-		-		• •		
<b>13-4.3</b> The key-loading device must be designed or controlled so that only authorized pe can use and enable it to output a key into another SCD. Such personnel must ensure tha not inserted between the SCDs.								
<b>13-4.3.a</b> Verify the key-loading device is designed or controlled so that only authorized personnel under dual control can use and enable it to output a key into another SCD.	<report findings="" here=""></report>							
<b>13-4.3.b</b> Verify that both authorized personnel involved in key-loading activity inspect the key-loading device prior to use to ensure that a key-recording device has not been inserted between the SCDs.	<report findings="" here=""></report>							
<b>13-4.4</b> The key-loading device must not retain any information that might disclose the key key for injection into a non-SCD—that was installed in the device or a key that it has succ								
<b>13-4.4</b> Verify the key-loading device does not retain any information that might disclose the key or a key that it has successfully transferred. For example, attempt to output the same value more than one time from the device or cause the device to display check values for its contents both before and after injection and compare.	<report findings="" here=""></report>							



Annex B, Control Objective 4 PCI PIN Security Requirements Assessor's Response	Sum	mary of <i>I</i> (c	Assessm heck one		ings	
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<ul> <li>13-5 Any media (electronic or otherwise) containing secret or private key components or sh cryptographic keys must be maintained in a secure storage location and accessible only to a When removed from the secure storage location, media or devices containing key component of clear-text cryptographic keys must be in the physical possession of only the designated conly for the minimum practical time necessary to complete the key-loading process.</li> <li>The media upon which a component resides must be physically safeguarded at all times wh storage.</li> <li>Key components that can be read/displayed (for example, those printed on paper or stored PROMs, or smartcards) must be managed so they are never used in a manner that would rebeing displayed in clear text to anyone who is not a designated custodian for that component</li> </ul>	authorized custodian(s). ents or used for the injection component holder(s), and nen removed from secure on magnetic cards, esult in the component					
<b>13-5.a</b> Interview personnel and observe media locations to verify that the media is maintained in a secure storage location accessible only to custodian(s) authorized to access the key components.	<report findings="" here=""></report>					
<b>13-5.b</b> Examine documented procedures for removing media or devices containing key components—or that are otherwise used for the injection of cryptographic keys—from the secure storage location. Verify procedures include the following:	<report findings="" here=""></report>					
<ul> <li>Requirement that media/devices are in the physical possession of only the designated component holder(s).</li> </ul>						
<ul> <li>The media/devices are removed from secure storage only for the minimum practical time necessary to complete the key-loading process.</li> </ul>						
<b>13-5.c</b> Interview designated component holder(s) and examine key-management logs to verify that media or devices removed from secure storage are in the physical possession of only the designated component holder.	<report findings="" here=""></report>					
<b>13-5.d</b> Interview key-injection personnel and examine logs for the removal of media/devices from secure storage to verify they are removed only for the minimum practical time necessary to complete the key-loading process.	<report findings="" here=""></report>					
<b>13-6</b> If the component is in human-readable form (e.g., printed within a PIN-mailer type doc only to the designated component custodian and only for the duration of time required for the the key component into an SCD.						



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>13-6</b> Validate through interview and observation that printed key components are not opened until just prior to entry into the SCD. Plaintext secret and/or private keys and/or their components are visible only to key custodians for the duration of loading into an SCD.	<report findings="" here=""></report>							
13-7 Written or printed key-component documents must not be opened until immediately pr	ior to use.							
<b>13-7.a</b> Examine documented procedures and confirm that printed/written key-component documents are not opened until immediately prior to use.	<report findings="" here=""></report>							
<b>13-7.b</b> Observe key-loading processes and verify that printed/written key components are not opened until immediately prior to use.	<report findings="" here=""></report>							
<b>13-8</b> A person with access to any component or share of a secret or private key, or to the media conveying this value, must not have access to other components or shares of this key or to any other medium containing other components or shares of this key that are sufficient to form the necessary threshold to derive the key.								
E.g., in an m-of-n scheme (which must use a recognized secret-sharing scheme such as S key components or shares (i.e., $m = 3$ ) can be used to derive the key, no single individual of than two components/shares.								
<b>13-8.a</b> Examine documented procedures for the use of key components to verify that procedures ensure that any individual custodian only has access to their assigned components and never has access to sufficient key components to reconstruct a cryptographic key.	<report findings="" here=""></report>			1	1	1		
<b>13-8.b</b> Examine key-component access controls and access logs to verify that any single authorized custodians can and has only had access to their assigned component(s) and cannot access sufficient key components to reconstruct a cryptographic key.	<report findings="" here=""></report>							
<b>13-9</b> Key-injection facilities that use PC-based key-loading software platforms or similar det that allow clear-text secret and/or private keys and/or their components to exist in memory of an SCD must minimally implement the following additional controls:								
<b>Note: Effective 1 January 2021,</b> entities engaged in key loading on behalf of others shall based key-loading methodologies where clear-text secret and/or private keying material ap outside the secure boundary of an SCD.								
<i>Effective 1 January 2023</i> , entities only performing key loading for devices for which they a longer have this option.	are the processor shall no							



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Sun			Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place						
<b>13-9</b> Interview appropriate personnel and examine documentation to determine the procedures for key loading to POIs, key-loading devices, and HSMs that are part of the key-loading platform. Examine any logs of key loading.	<report findings="" here=""></report>		-	-	• •							
<ul> <li>13-9.1 PCs and similar devices must be:</li> <li>Standalone (i.e., without modems, not connected to a LAN or WAN, not capable of wireless connections, etc.);</li> <li>Dedicated to only the key-loading function (e.g., there must not be any other application software installed); and</li> <li>Located in a physically secure room meeting the criteria of Requirement 32-9 that is dedicated to key-loading activities.</li> </ul>												
<ul> <li>13-9.1 For facilities using PC-based key-loading software platforms or similar devices, verify through interviews and observation that the platform is:</li> <li>Standalone</li> <li>Dedicated to only key loading</li> <li>Located in a physically secure room meeting the criteria of Requirement 32-9 that is dedicated to key loading activities</li> </ul>	<report findings="" here=""></report>											
<b>13-9.2</b> All hardware used in key loading (including the PC) must be managed under dual control. Key-injection must not occur unless there are minimally two individuals in the key-injection room at all times during the process. If a situation arises that would cause only one person to be in the room, all individuals must exit until at least two can be inside.												
<ul> <li>13-9.2 Verify through interviews and observation that:</li> <li>All hardware used in key loading (including the PC) is managed under dual control.</li> <li>Key-injection cannot occur unless there are minimally two individuals in the key-injection room at all times during the process.</li> <li>Mechanisms exist (See Requirement 32) that do not permit the room to be occupied by fewer than two authorized individuals.</li> </ul>	<report findings="" here=""></report>											



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>13-9.3</b> PC access and use must be monitored, and logs of all key loading must be maintained. These logs must be retained for a minimum of three years. The logs must be regularly (no less frequently than weekly) reviewed by an authorized person who does not have access to the room or to the PC. The reviews must be documented. The logs must include but not be limited to:								
<ul> <li>Logs of access to the room from a badge-access system;</li> </ul>								
<ul> <li>Logs of access to the room from a manual sign-in sheet;</li> </ul>								
<ul> <li>User sign-on logs on the PC at the operating-system level;</li> </ul>								
<ul> <li>User sign-on logs on the PC at the application level;</li> </ul>								
<ul> <li>Logs of the device IDs and serial numbers that are loaded, along with the date and ti performing the key-injection;</li> </ul>	me and the individuals							
Video surveillance logs with a minimum retention period of 45 days.								
<b>13-9.3.a</b> Verify through interviews and observation that logs of key-loading activities are maintained and meet the following:	<report findings="" here=""></report>							
Retained for a minimum of three years.								
<ul> <li>Regularly reviewed by an authorized person who does not have access to the room or to the PC.</li> </ul>								
The reviews are documented.								



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)							
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>13-9.3.b</b> Verify through interviews and observation that logs of key-loading activities are maintained and meet the following:	<report findings="" here=""></report>								
Retained for a minimum of three years.									
<ul> <li>Regularly reviewed by an authorized person who does not have access to the room or to the PC.</li> </ul>									
The reviews are documented.									
Logs include a minimum of:									
<ul> <li>Access to the room from a badge access system,</li> </ul>									
<ul> <li>Access to the room from a manual sign-in sheet,</li> </ul>									
<ul> <li>User sign-on logs on the PC at the operating system level,</li> </ul>									
<ul> <li>User sign-on logs on the PC at the application level,</li> </ul>									
<ul> <li>Logs of the device IDs and serial numbers that are loaded along with the date and time and the individuals performing the key-injection,</li> </ul>									
<ul> <li>Video surveillance logs with a minimum retention period of 45 days.</li> </ul>									
13-9.4 Additionally:	13-9.4 Verify through inter	rviews an	id observat	ion that:					
<b>13-9.4.1</b> Cable attachments and the key-loading device must be examined before each equipment is free from tampering.	h use to ensure the								
<b>13-9.4.1</b> Cable attachments and the key-loading device are examined before each use to ensure the equipment is free from tampering.	<report findings="" here=""></report>								
<b>13-9.4.2</b> The key-loading device must be started from a powered-off position every tim occur.	e key-loading activities								
<b>13-9.4.2</b> The key-loading device is started from a powered-off position every time key-loading activities occur.	<report findings="" here=""></report>								
<b>13-9.4.3</b> The software application must load keys without recording any clear-text valu other unsecured devices.	es on portable media or								
<b>13-9.4.3</b> The software application loads keys without recording any clear-text values on portable media or other unsecured devices.									



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Sum	nmary of a	Assessr heck on		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
13-9.4.4 Clear-text keys must not be stored except within an SCD.						
13-9.4.4 Clear-text keys are not stored except within an SCD.	<report findings="" here=""></report>		1		1	
<b>13-9.4.5</b> The personnel responsible for the systems administration of the PC (e.g., a W configures the PC's user IDs and file settings, etc.) must not have authorized access in escorted by authorized key-injection personnel—and they must not have user IDs or produces to operate the key-injection application.	nto the room—they must be					
<b>13-9.4.5</b> Personnel responsible for the systems administration of the PC do not have authorized access into the room—i.e., they are escorted by authorized key-injection personnel—and do not have user IDs or passwords/authentication codes to operate the key-injection application.	<report findings="" here=""></report>					
<b>13-9.4.6</b> The key-injection personnel must not have system-administration capability at application level on the PC.	t either the O/S or the					
<b>13-9.4.6</b> Key-injection personnel do not have system-administration capability at either the O/S or the application level on the PC.	<report findings="" here=""></report>					<u>.</u>
<b>13-9.4.7</b> The PC must not be able to boot from external media (e.g., USB devices or C hard drive only.	Ds). It must boot from the					
<b>13-9.4.7</b> The PC is not able to boot from external media (e.g., USB devices or CDs). It must boot from the hard drive only.	<report findings="" here=""></report>		1		1	
<b>13-9.4.8</b> Key-injection facilities must cover all openings on the PC that are not used for seals that are tamper-evident and serialized. Examples include but are not limited to P and modem connections on the PC, and access to the hard drive and memory. The se log, and the log must be maintained along with the other key-loading logs in a dual-cor seals must be performed prior to key-loading activities.	CMCIA, network, infrared als must be recorded in a					
<b>13-9.4.8</b> All openings on the PC that are not used for key-injection are covered with security seals that are tamper-evident and serialized. The seals are recorded in a log, and the log is maintained along with the other key-loading logs in a dual-control safe. Verification of the seals must be performed prior to key-loading activities.	<report findings="" here=""></report>					



Annex B, Control Objective 4 PCI PIN Security Requirements		Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures		Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>13-9.4.9</b> If the PC application stores clear-text key components (e.g., BDKs or TMKs) on portable electronic media (e.g., smart cards), the media must be secured as components under dual control when not in use. The key components must be manually entered at the start of each key-injection session from components that are maintained under dual control and split knowledge.									
<b>Note:</b> For DUKPT implementations, the BDK should be loaded from component manual tracking of the device ID counter and serial numbers from the previous facilities with PC applications that require passwords/authentication codes to be on portable electronic media (e.g., smart cards) must ensure the passwords/a under dual control and split knowledge.									
<b>13-9.4.9</b> If the PC application stores keys (e.g., BDKs or TMKs) on portable electronic media (e.g., smart cards), the media is secured as components under dual control when not in use. The key components are manually entered at the start of each key-injection session from components that are maintained under dual control and split knowledge.									
13-9.4.10 Manufacturer's default passwords/authentication codes for PC-base	ed applica	ations must be changed.							
<b>13-9.4.10</b> Manufacturer's default passwords/authentication codes for PC-base applications are changed.	ed	<report findings="" here=""></report>	1	1	1	1	1		
<b>Requirement 14:</b> All hardware and access/authentication mechanisms (e.g under the principle of dual control.	., passw	rords/authentication codes) ι	ised for l	key loadin	g must b	e manage	ed		
Key-injection facilities must ensure that the key-injection application password to enforce dual control. Also, the hardware used for key-injection must be mar be changed.									
<b>14-1</b> Any hardware and passwords/authentication codes used in the key-loading furmaintained in a secure environment under dual control. Resources (e.g., passwords)									

The first of the passing function and passing function made be controlled and			
maintained in a secure environment under dual control. Resources (e.g., passwords/authentication codes and			
associated hardware must be managed such that no single individual has the capability to enable key loading. This is			
not to imply that individual access authentication mechanisms must be managed under dual control.			



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Sun	nmary of <i>i</i> (c	Assessn heck on		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
14-1.a Examine documented procedures to verify they require the following:	<report findings="" here=""></report>					
<ul> <li>Any hardware used in the key-loading function must be controlled and maintained in a secure environment under dual control.</li> </ul>						
• Any resources (e.g., passwords/authentication codes and associated hardware) used in the key-loading function must be controlled and managed such that no single individual has the capability to enable key loading.						
14-1.b Observe key-loading environments and controls to verify the following:	<report findings="" here=""></report>					
<ul> <li>All hardware used in the key-loading function is controlled and maintained in a secure environment under dual control.</li> </ul>						
<ul> <li>All resources (e.g., passwords/authentication codes and associated hardware) used for key-loading functions are controlled and managed such that no single individual has the capability to enable key loading.</li> </ul>						
<b>14-2</b> All cable attachments over which clear-text keying material traverses must be examine entity's key-activity operations (system power on/authorization) to ensure they have not been compromised.						
<b>14-2.a</b> Examine documented procedures to ensure they require that cable attachments are examined at the beginning of an entity's key-activity operations (system power on/authorization).	<report findings="" here=""></report>	-				
<b>14-2.b</b> Observe key-loading processes to verify that all cable attachments are properly examined at the beginning of an entity's key-activity operations (system power on/authorization).	<report findings="" here=""></report>					
<b>14-3</b> Key-loading equipment usage must be monitored, and a log of all key-loading activitie purposes containing at a minimum date, time, personnel involved, and number of devices k						
<b>14-3.a</b> Observe key-loading activities to verify that key-loading equipment usage is monitored.	<report findings="" here=""></report>					
<b>14-3.b</b> Verify logs of all key-loading activities are maintained and contain all required information.	<report findings="" here=""></report>					



Annex B, Control Objective 4 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>14-4</b> Any physical tokens (e.g., brass keys or chip cards) used to enable key-loading must possession of any one individual who could use those tokens to load secret or private crypt control. These tokens must be secured in a manner similar to key components including tal packaging and the use of access-control logs for when removed or placed into secure store	ographic keys under single mper-evident authenticable							
<b>14-4.a</b> Examine documented procedures for the use of physical tokens (e.g., brass keys or chip cards) to enable key loading. Verify procedures require that physical tokens must not be in the control or possession of any one individual who could use those tokens to load secret or private cryptographic keys under single control.	<report findings="" here=""></report>							
<b>14-4.b</b> Inspect locations and controls for physical tokens to verify that tokens used to enable key loading are not in the control or possession of any one individual who could use those tokens to load secret or private cryptographic keys under single control.	<report findings="" here=""></report>							
<b>14-4.c</b> Examine storage locations for physical tokens to determine adequacy to ensure that only the authorized custodian(s) can access their specific tokens.	<report findings="" here=""></report>							
<b>14-4.d</b> Verify that access-control logs exist and are in use, including notation of tamper- evident authenticable bag numbers.	<report findings="" here=""></report>							
14-4.e Reconcile storage contents to access-control logs.	<report findings="" here=""></report>							
<b>14-5</b> Default passwords/authentication codes used to enforce dual-control must be change procedures must exist to require that these password/PINs be changed when assigned per								
<b>14-5.a</b> Verify that documented procedures require default passwords/authentication codes used to enforce dual control are changed.	<report findings="" here=""></report>							
<b>14-5.b</b> Verify that documented procedures exist to require that these passwords/authentication codes be changed when assigned personnel change.	<report findings="" here=""></report>							



Annex B, Control Objective 4 PCI PIN Security Requirements		Reporting Details:	Summary of Assessment Findings (check one)						
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
Requirement 15:	The loading of keys or key components must incorporate a valida can be ascertained that they have not been tampered with, substi		e auther	ticity of th	e keys is	ensured	, and it		
and/or their compon upon the keys or key displayed, key-comp all portions of the key accordance with the <b>Note:</b> Check values using the leftmost n- must be used for TE all-zero block using be the leftmost n-bit CMAC function is th	c-based validation mechanism must be in place to ensure the authentic ents (for example, testing key check values, hashes, or other similar ur y components being loaded). See <i>ISO 11568</i> . Where check values are bonent check values and key check values shall be generated by a cryp y or key component are involved in generating the check value. The ch following note. are computed by encrypting an all-zero block using the key or compone- bits of the result—where n is at most 24 bits (6 hexadecimal digits/3 by DEA or TDEA must use, and AES shall use a technique where the KCV the CMAC algorithm as specified in ISO 9797-1 (see also NIST SP 800 s of the result, where n is at most 40 bits (10 hexadecimal digits). The k e same as the block cipher of the key itself. A TDEA key or a compone DEA block cipher, while a 128-bit AES key or component will be MACed	hique values that are based used, recorded, or btographic process such that neck value shall be in hent as the encryption key, tres). Either this method is calculated by MACing an 0-38B). The check value will block cipher used in the nt of a TDEA key will be							
	umented procedures to verify a cryptographic-based validation ce to ensure the authenticity and integrity of keys and/or components.	<report findings="" here=""></report>	I	1	I				
validation mechanis	key-loading processes to verify that the defined cryptographic-based m used to ensure the authenticity and integrity of keys and g used and are verified by the applicable key custodians.	<report findings="" here=""></report>							
15-1.c Verify that the	e methods used for key validation are consistent with ISO 11568—for	<report findings="" here=""></report>							

example, if check values are used, they are in accordance with this requirement.



Annex B, Control Objective 4 PCI PIN Security Requirements and Test Procedures	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>15-2</b> The public key must have its authenticity and integrity ensured. In order to ensure authenticity and integrity, a public key must be encrypted, or if in plaintext form, must:								
Be within a certificate as defined in Annex A; or								
• Be within a PKCS#10 (authentication and integrity occurs via other mechanisms); or								
Be within an SCD; or								
Have a MAC (message authentication code) created using the algorithm defined in ISG	D 16609.							
<b>15-2.a</b> Interview personnel and examine documented procedures to verify that all public keys exist only in an approved form.	<report findings="" here=""></report>	1			1			
<b>15-2.b</b> Observe public-key stores and mechanisms to verify that public keys exist only in an approved form.	<report findings="" here=""></report>							
Requirement 16: Documented procedures must exist and be demonstrably in use (including audit trails) for all				es.				
<b>16-1</b> Documented key-loading procedures must exist for all devices (e.g., HSMs and POIs) cryptographic key loading must be aware of those procedures.	, and all parties involved in							
<b>16-1.a</b> Verify documented procedures exist for all key-loading operations.	<report findings="" here=""></report>							
<b>16-1.b</b> Interview responsible personnel to verify that the documented procedures are known and understood by all affected parties for all key-loading operations.	<report findings="" here=""></report>							
<b>16-1.c</b> Observe key-loading process for keys loaded as components and verify that the documented procedures are demonstrably in use. This may be done as necessary on test equipment—e.g., for HSMs.	<report findings="" here=""></report>							
16-2 All key-loading events must be documented. Audit trails must be in place for all key-loading	ading events.							
<b>16-2</b> Examine log files and observe logging processes to verify that audit trails are in place for all key-loading events.	<report findings="" here=""></report>							



Control Objective 5: Keys are used in a manner that prevents or detects their unauthorized usage.

Annex B, Control Objective 5 PCI PIN Security Requirements		Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)					
and Test Procedures	In Place		In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 18:</b> Procedures must exist to prevent or detect the unauthorized substitution (unauthorized key replacement and key misuse) of one key for another or the operation of any cryptographic device without legitimate keys.							y for	
<b>18-2</b> To prevent or detect usage of a compromised key, key-component packaging, or containers that show signs of tampering indicating a component was potentially compromised must be assessed and the analysis formally documented. If compromise is confirmed, it must result in the discarding and invalidation of the component and the associated key at all locations where they exist.								
packaging/containers showir compromised are assessed confirmed, it must result in th	ed procedures require that key-component ng signs of tampering indicating a component was potentially and the analysis is formally documented. If compromise is ne destruction and invalidation of all associated key nt cryptographic key(s) at all locations where they exist.	<report findings="" here=""></report>					<u>.</u>	
to require that key-component indicating a component was formally documented. If com	and observe processes to verify procedures are implemented nt packaging/containers showing signs of tampering potentially compromised are assessed and the analysis is promise is confirmed, it results in the destruction and key components and the resultant cryptographic key(s) at all	<report findings="" here=""></report>						



Annex B, Control Objective 5 PCI PIN Security Requirements		Sum		Assessm heck one	ment Findings ne)		
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>18-3</b> Encrypted symmetric keys must be managed in structures called key blocks. The key cryptographically bound to the key using accepted methods	usage must be						
<ul> <li>Phase 1 – Implementation dates are as follows:</li> <li>Phase 1 – Implement Key Blocks for internal connections and key storage within Service Provider Environments – this would include all applications and databases connected to hardware security modules (HSM). Effective date: 1 June 2019.</li> </ul>							
<ul> <li>Phase 2 – Implement Key Blocks for external connections to Associations and Networl 2021.</li> </ul>	ks. Effective date: 1 June						
<ul> <li>Phase 3 – Implement Key Block to extend to all merchant hosts, point-of-sale (POS) didate: 1 June 2023.</li> </ul>	evices and ATMs. Effective						
Acceptable methods of implementing the integrity requirements include, but are not limited	to:						
<ul> <li>A MAC computed over the concatenation of the clear-text attributes and the enciphered which includes the key itself—e.g. TR-31;</li> </ul>							
A digital signature computed over that same data;							
• An integrity check that is an implicit part of the key-encryption process such as that which is used in the AES key- wrap process specified in ANSI X9.102.							
<b>18-3</b> Using the cryptographic-key summary to identify secret keys conveyed or stored, examine documented procedures and observe key operations to verify that secret cryptographic keys are managed as key blocks using mechanisms that cryptographically bind the key usage to the key at all times via one of the acceptable methods or an equivalent.	<report findings="" here=""></report>						
Where key blocks are not implemented, identify and examine project plans to implement in accordance with the prescribed timeline.							
<b>18-4</b> Controls must be in place to prevent and detect the loading of unencrypted private and components by any one single person.	d secret keys or their						
<b>Note:</b> Controls include physical access to the room, logical access to the key-loading applic activities in the key-injection room, physical access to secret or private cryptographic key controls in the key-injection room, physical access to secret or private cryptographic key controls in the key-injection room.							
<b>18-4.a</b> Examine documented key-injection procedures to verify that controls are defined to prevent and detect the loading of keys by any one single person.	<report findings="" here=""></report>				1		



Annex B, Control Objective 5	Annex B, Control Objective 5 PCI PIN Security Requirements and Test Procedures Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)					
		In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>18-4.b</b> Interview responsible personnel and observe key-loading processes and controls to verify that controls—for example, viewing CCTV images—are implemented to prevent and detect the loading of keys by any one single person.	<report findings="" here=""></report>						
<b>18-5</b> Key-injection facilities must implement controls to protect against unauthorized substitution of keys and to preven the operation of devices without legitimate keys. Examples include but are not limited to:							
All devices loaded with keys must be tracked at each key-loading session by serial nut	mber.						
<ul> <li>Key-injection facilities must use something unique about the POI (for example, logical identifiers) when deriving key (for example, DUKPT, TMK) injected into it.</li> </ul>							
18-5.a Examine documented procedures to verify they include:	<report findings="" here=""></report>						
<ul> <li>Controls to protect against unauthorized substitution of keys, and</li> </ul>							
<ul> <li>Controls to prevent the operation of devices without legitimate keys.</li> </ul>							
<b>18-5.b</b> Interview responsible personnel and observe key-loading processes and controls to verify that:	<report findings="" here=""></report>						
Controls are implemented that protect against unauthorized substitution of keys, and							
<ul> <li>Controls are implemented that prevent the operation of devices without legitimate keys.</li> </ul>							
Requirement 19: Cryptographic keys must be used only for their sole intended purp	pose and must never be sha	red betwe	en produc	tion and	test syst	ems.	
Where test keys are used, key-injection facilities must use a separate test system for the injection of test keys.							

- Test keys must not be injected using the production platform, and test keys must not be injected into production equipment.
- Production keys must not be injected using a test platform, and production keys must not be injected into equipment that is to be used for testing purposes.
- Keys used for signing of test certificates must be test keys.
- Keys used for signing of production certificates must be production keys.



Annex B, Control Objective 5 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>19-1</b> Encryption keys must be used only for the purpose they were intended—i.e., key-encryption keys must not to be used as PIN-encryption keys, PIN-encryption keys must not be used for account data, etc. Derivation Keys may be derived into multiple keys, each with its own purpose. For example, a DUKPT Initial Key may be used to derive both a PIN encryption key and a data encryption key. The derivation key would only be used for its own purpose, key derivation. This is necessary to limit the magnitude of exposure should any key(s) be compromised. Using keys only as they are intended also significantly strengthens the security of the underlying system.								
<b>19-1.a</b> Examine key-management documentation (e.g., the cryptographic key inventory) and interview key custodians and key-management supervisory personnel to verify that cryptographic keys are defined for a specific purpose.	<report findings="" here=""></report>							
<b>19-1.b</b> Using a sample of device types, validate via examination of check values, terminal definition files, etc. that keys used for key encipherment or PIN encipherment are not used for any other purpose.								
<ul><li>19-2 Private keys:</li><li>Must be used only for a single purpose—a private key must only be used for either decompose.</li></ul>	cryption or for creating digital							
signatures, but not both (except for transaction-originating POI devices).								
<ul> <li>Must never be used to encrypt other keys.</li> </ul>								
When used for remote key distribution, must not be used in connection with any other purpose.								
<b>Note:</b> The restriction does not apply to certificate signing requests e.g., PKCS #10.								
<b>19-2</b> Examine key-management documentation and interview key custodians and key- management supervisory personnel to verify that private keys are:	<report findings="" here=""></report>	<u>.</u>	<u>.</u>					
<ul> <li>Used only to create digital signatures or to perform decryption operations.</li> </ul>								
<ul> <li>Used only for a single purpose—a private key must only be used for either decryption or for creating digital signatures, but not both (except for POI devices).</li> </ul>								
Never used to encrypt other keys.								
<ul> <li>Not used in connection with any other purpose when used for remote key distribution.</li> </ul>								
<b>19-3</b> Public keys must only be used for a single purpose—a public key must only be used for verifying digital signatures, but not both (except for transaction-originating POI devices).	or either encryption or for							



Annex B, Control Objective 5 PCI PIN Security Requirements	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>19-3</b> Examine key-management documentation and interview key custodians and key- management supervisory personnel to verify that public keys are only used:	<report findings="" here=""></report>		1				
<ul> <li>To perform encryption operations or to verify digital signatures.</li> </ul>							
<ul> <li>For a single purpose—a public key must only be used for either encryption or for verifying digital signatures, but not both (except for POI devices).</li> </ul>							
19-4 Keys must never be shared or substituted between production and test/development s	systems:						
Key used for production keys must never be present or used in a test system, and							
• Keys used for testing keys must never be present or used in a production system.							
<b>Note:</b> For logically partitioned HSMs and computing platforms, if one or more logical partition used for production and one or more other logical partitions are used for testing, including configuration that is impacted—computing platform(s) and networking equipment—must be production.	QA or similar, the entire						
<b>19-4.a</b> Examine key-management documentation and interview key custodians and key- management supervisory personnel to verify that cryptographic keys are never shared or substituted between production and development systems.	<report findings="" here=""></report>						
<b>19-4.b</b> Observe processes for generating and loading keys into in production systems to ensure that they are in no way associated with test or development keys.	<report findings="" here=""></report>						
<b>19-4.c</b> Observe processes for generating and loading keys into test systems to ensure that they are in no way associated with production keys.	<report findings="" here=""></report>						
<b>19-4.d</b> Compare check, hash, cryptogram, or fingerprint values for production and test/development keys for higher-level keys (e.g., MFKs, KEKs shared with other network nodes, and BDKs) to verify that development and test keys have different key values.	<report findings="" here=""></report>						
<b>19-5</b> If a business rationale exists, a production platform (HSM and server/standalone compused for test purposes. However, all keying material must be deleted from the HSM(s) and server/computer platforms prior to testing. Subsequent to completion of testing, all keying material resource platforms must be wiped and rebuilt from read-only media, and the relematerial restored using the principles of dual control and split knowledge as stated in these At all times the HSMs and server/computers must be physically and logically secured in an requirements.	the key-injection naterials must be deleted, evant production keying requirements.						
Note this does not apply to HSMs that are never intended to be used for production.							



Annex B, Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Sum	mary of Assessment Findings (check one)				
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>19-5</b> Interview personnel to determine whether production platforms are ever temporarily used for test purposes.	<report findings="" here=""></report>						
If they are, verify that documented procedures require that:							
<ul> <li>All keying material is deleted from the HSM(s) and the server /computer platforms prior to testing.</li> </ul>							
<ul> <li>Subsequent to completion of testing, all keying materials must be deleted, and the server/computer platforms must be wiped and rebuilt from read-only media,</li> </ul>							
<ul> <li>Prior to reuse for production purposes the HSM is returned to factory state,</li> </ul>							
<ul> <li>The relevant production keying material is restored using the principles of dual control and split knowledge as stated in these requirements.</li> </ul>							



Annex B, Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Sum	nent Find e)	ings				
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 20:</b> All secret and private cryptographic keys ever present and used for any function (e.g., key-encipherment or PIN-encipherment) by a transaction-originating terminal (e.g., PED) that processes PINs must be unique (except by chance) to that device.								
<b>20-1</b> POI devices must implement unique secret and private keys for any function directly or protection. These keys must be known only in that device and in hardware security module number of facilities consistent with effective system operations.	-							
Disclosure of the key in one such device must not provide any information that could be feat key in any other such device.	sibly used to determine the							
This means that not only the PIN-encryption key(s), but also keys that are used to protect of authentication keys, payment application authentication, and display-prompt control keys. A this does not apply to public keys resident in the device.								
POI private keys must not exist anywhere but the specific POI they belong to, except where POI and prior to the injection into the POI.	e generated external to the							
<b>20-1.a</b> Examine documented procedures for the generation, loading, and usage of all keys used in transaction-originating POI devices. Verify the procedures ensure that all private and secret keys used in transaction-originating POI devices are:	<report findings="" here=""></report>							
<ul> <li>Known only to a single POI device, and</li> </ul>								
<ul> <li>Known only to HSMs at the minimum number of facilities consistent with effective system operations.</li> </ul>								
<b>20-1.b</b> Observe HSM functions and procedures for generating and loading secret and private keys for use in transaction-originating POIs to verify that unique keys are generated and used for each POI device.	<report findings="" here=""></report>							
<b>20-1.c</b> Examine check values, hashes, or fingerprint values for a sample of cryptographic keys from different POI devices to verify private and secret keys are unique for each POI device. This can include comparing a sample of POI public keys (multiple devices for each POI vendor used) to determine that the associated private keys stored in the POI devices are unique per device—i.e., the public keys are unique.	<report findings="" here=""></report>							
<b>20-2</b> If a transaction-originating terminal (for example POI device) interfaces with more than the transaction-originating terminal SCD must have a completely different and unique key of acquiring organization. These different keys, or sets of keys, must be totally independent an another.	or set of keys for each							



Annex B, Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Sum	nent Find e)	lings		
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>20-2a</b> Determine whether any transaction-originating terminals interface with multiple acquiring organizations. If so:	<report findings="" here=""></report>					
<ul> <li>Examine documented procedures for generating all types of keys and verify the procedures ensure that unique keys or sets of keys are used for each acquiring organization and are totally independent and not variants of one another.</li> </ul>						
<ul> <li>Interview personnel and observe key-generation processes to verify that unique keys or sets of keys are generated for each acquiring organization.</li> </ul>						
<b>20-2b</b> Observe processes for generation and injection of keys into a single POI for more than one acquiring organization, to verify:	<report findings="" here=""></report>					
<ul> <li>The POI has a completely different and unique key, or set of keys, for each acquiring organization.</li> </ul>						
<ul> <li>These different keys, or sets of keys, are totally independent and not variants of one another.</li> </ul>						
<b>20-3</b> Keys that are generated by a derivation process and derived from the same Base (master) Derivation Key must use unique data for the derivation process as defined in <i>ISO 11568</i> so that all such cryptographic devices receive unique initial secret keys. Base derivation keys must not ever be loaded onto POI devices—i.e., only the derived key is loaded to the POI device.						
This requirement refers to the use of a single "base" key to derive initial keys for many diffe derivation process as described above. This requirement does not preclude multiple unique single device, or for the device to use a unique key for derivation of other keys once loaded DUKPT.	e keys being loaded on a					
<b>Note:</b> The same BDK with the same KSN installed in multiple injection systems or installed same injection system will not meet uniqueness requirements.	I multiple times within the					



Annex B, Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Sum	nent Find ∋)	Findings		
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>20-3.a</b> Examine documented procedures and observe processes for generating initial keys. Verify the following is implemented where initial keys are generated by a derivation process and derived from the same Base Derivation Key:	<report findings="" here=""></report>				·	
<ul> <li>Unique data is used for the derivation process such that all transaction-originating POIs receive unique secret keys.</li> </ul>						
<ul> <li>Key derivation is performed prior to a key being loaded/sent to the recipient transaction-originating POI.</li> </ul>						
<ul> <li>Examine key-generation/injection logs to ensure that sequential values included in unique key derivation are not repeated.</li> </ul>						
<b>20-3.b</b> Verify that derivation keys used to generate keys for multiple devices are never loaded into a POI device.	<report findings="" here=""></report>					
<b>20-4</b> Entities processing or injecting DUKPT or other key-derivation methodologies must in strategy in their environments. Segmentation must use one or more of the following techni						
Different BDKs for each financial institution						
• Different BDKs by injection vendor (e.g., ESO), terminal manufacturer, or terminal mo	del					
Different BDKs by geographic region, market segment, processing platform, or sales	unit					
<ul> <li>Injection vendors must use at least one unique Base Derivation Key (BDK) per acquir able to support segmentation of multiple BDKs of acquiring organizations.</li> </ul>	ing organization and must be					
<b>20-4.a</b> Examine documented key-generation and injection procedures to verify that entities processing or injecting DUKPT or other key-derivation methodologies incorporate a segmentation strategy in their environments using one or more of the following techniques:	<report findings="" here=""></report>					
<ul> <li>Different BDKs for each financial institution</li> </ul>						
<ul> <li>Different BDKs by injection vendor (e.g., ESO), terminal manufacturer, or terminal model</li> </ul>						
<ul> <li>Different BDKs by geographic region, market segment, processing platform, or sales unit</li> </ul>						



Annex B, Control Objective 5 PCI PIN Security Requirements	Reporting Details:	Sum	n <b>ent Find</b> e)	ent Findings		
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>20-4.b</b> Examine documented key-generation and injection procedures to verify that key- injection vendors use at least one unique Base Derivation Key (BDK) per acquiring organization and are able to support segmentation of multiple BDKs of acquiring organizations.	<report findings="" here=""></report>					
<b>20-5</b> Key-injection facilities that load DUKPT keys for various POI types for the same entity per terminal type if the terminal IDs can be duplicated among the multiple types of terminal injection facility must ensure that any one given key cannot be derived for multiple devices	s. In other words, the key-					
<b>20-5.a</b> If the key-injection facility loads DUKPT keys, examine documented procedures for generation and use of BDKs to verify they require use of separate BDKs per terminal type.	<report findings="" here=""></report>					
<b>20-5.b</b> Observe key-loading processes for a sample of terminal types used by a single entity, to verify that separate BDKs are used for each terminal type.	<report findings="" here=""></report>					
20-6 Remote Key-Establishment and Distribution Applications						
The following requirements apply to key-injection facilities participating in remote key-estable applications:	lishment and distribution					
<ul> <li>Keys must be uniquely identifiable in all hosts and POI Devices—e.g., EPPs/PEDs. Keys cryptographically verifiable means—e.g., through the use of digital signatures or key classifier or the second se</li></ul>						
<ul> <li>Key pairs must be unique per POI device—e.g., EPPs and PEDs.</li> </ul>						
<b>20-6.a</b> For techniques involving public key cryptography, examine documentation and develop a schematic to illustrate the process, including:	<report findings="" here=""></report>					
<ul> <li>The size and sources of the parameters involved, and</li> </ul>						
<ul> <li>The mechanisms utilized for mutual device authentication for both the host and the POI PED.</li> </ul>						
<b>20-6.b</b> If key-establishment protocols using public-key cryptography are used to distribute secret keys, verify that:	<report findings="" here=""></report>					
<ul> <li>Cryptographic mechanisms exist to uniquely identify the keys.</li> </ul>						
<ul> <li>Key pairs used by POI devices are unique per device.</li> </ul>						



### Control Objective 6: Keys are administered in a secure manner.

Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Sum		Assessm check one	nent Find ∋)	lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place

**Requirement 21:** Secret keys used for enciphering PIN-encryption keys or for PIN encryption, or private keys used in connection with remote keydistribution implementations, must never exist outside of SCDs, except when encrypted or securely stored and managed using the principles of dual control and split knowledge.

Key-injection facilities must ensure that KEKs and PIN-encryption keys do not exist outside of SCDs except when encrypted or stored under dual control and split knowledge.

Some key-injection platforms use personal-computer (PC)-based software applications or similar devices whereby clear-text secret and/or private keys and/or their components exist in memory outside the secure boundary of an SCD for loading keys. Such systems do not therefore meet this requirement. Such systems have inherent weaknesses that, if exploited, may cause the unauthorized disclosure of components and/or keys. The exploitation of some of the weaknesses could be possible without collusion. Therefore, key-injection facilities that use PC-based key-loading software platforms whereby clear-text secret and/or private keys and/or their components exist in memory outside the secure boundary of an SCD must minimally implement the compensating controls outlined in Requirement 13.

<ul> <li>At least two separate key shares (secret or private) or full-length components (secret)</li> <li>Encrypted with a key of equal or greater strength as delineated in Annex C</li> <li>Contained within a secure cryptographic device</li> <li>Note: Key-injection facilities may have clear-text keying material outside of a SCD when used within a secure room in accordance with Requirement. 32 in Annex B.</li> </ul>	]
Contained within a secure cryptographic device     Note: Key-injection facilities may have clear-text keying material outside of a SCD when used within a secure room in	
Note: Key-injection facilities may have clear-text keying material outside of a SCD when used within a secure room in	
<b>21-1.a</b> Examine documented procedures for key storage and usage to verify that secret or private keys only exist in one or more approved forms at all times when stored. <i><report findings="" here=""></report></i>	
<b>21-1.b</b> Observe key stores to verify that secret or private keys only exist in one or more approved forms at all times when stored. <i><report findings="" here=""></report></i>	
21-2 Wherever key components/shares are used, they have the following properties:	]
<b>21-2</b> Examine documented procedures and interview responsible personnel to determine all instances where key components/shares are used.	
<b>21-2.1</b> Knowledge of any one key component/share does not convey any knowledge of any part of the actual	]



Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Sum	<b>nent Finc</b> e)	nt Findings		
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	Not Tested	Not in Place	
<b>21-2.1</b> Examine processes for creating key components to verify that knowledge of any one key component or share does not convey any knowledge of any part of the actual cryptographic key.	<report findings="" here=""></report>			-		-
21-2.2 Construction of the cryptographic key requires the use of at least two key compon	ents/shares.					
<b>21-2.2</b> Observe processes for constructing cryptographic keys to verify that at least two key components/shares are required for each key construction.	<report findings="" here=""></report>					
21-2.3 Each key component/share has one or more specified authorized custodians.						
<b>21-2.3.a</b> Examine documented procedures for the use of key components and interview key custodians and key-management supervisory personnel to verify that each key component or share is assigned to a specific individual, or set of individuals, who are designated as key custodians for that component/share.	<report findings="" here=""></report>	1	1	1	1	1
<b>21-2.3.b</b> Observe key-component access controls and key-custodian authorizations/assignments to verify that all individuals with access to key components or shares are designated as key custodians for those particular components/shares.	<report findings="" here=""></report>					
<ul> <li>21-2.4 Procedures exist to ensure that no custodian ever has access to sufficient key corsecret or private key to reconstruct a cryptographic key.</li> <li>For example, in an m-of-n scheme (which must use a recognized secret-sharing scheme only two of any three shares are required to reconstruct the cryptographic key, a custodia prior knowledge of more than one share. If a custodian was previously assigned share A reassigned, the custodian must not then be assigned share B or C, as this would give the which gives them ability to recreate the key.</li> <li>In an m-of-n scheme where n=5 and where all three shares are required to reconstruct the single custodian may be permitted to have access to two of the key shares (for example, a second custodian (with, in this example, share C) would be required to reconstruct the control is maintained.</li> </ul>	such as Shamir), where an must not have current or which was then em knowledge of two shares, he cryptographic key, a share A and share B); and					
<b>21-2.4.a</b> Examine documented procedures for the use of key components/shares to verify that procedures ensure that no custodian ever has access to sufficient key components or shares to reconstruct a secret or private cryptographic key.	<report findings="" here=""></report>					



Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Sum	n <b>ent Find</b> e)	dings		
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>21-2.4.b</b> Examine key-component access controls and access logs to verify that authorized custodians cannot access sufficient key components or shares to reconstruct a secret or private cryptographic key.	<report findings="" here=""></report>		•		•	
21-3 Key components/shares must be stored as follows:						
<b>21-3</b> Examine documented procedures, interview responsible personnel, and inspect key- component/share storage locations to verify that key components/shares are stored as outlined in Requirements 21-3.1 through 21-3.3 below:	<report findings="" here=""></report>		·			
<b>21-3.1</b> Key components that exist in clear text outside of an SCD must be sealed in indivinumbered, tamper-evident, authenticable packaging that prevents the determination of the noticeable damage to the packaging.						
<b>Note:</b> Tamper-evident, authenticable packaging (opacity may be envelopes within tampe to secure key components must ensure that the key component cannot be determined. F paper, opacity may be sufficient, but consideration must be given to any embossing or ot "read" the component without opening of the packaging. Similarly, if the component is sto other media that can be read without direct physical contact, the packaging should be des access to the key component.	or components written on her possible methods to pred on a magnetic card, or					
<b>21-3.1.a</b> Examine key components and storage locations to verify that components are stored in individual opaque, pre-numbered, tamper-evident packaging that prevents the determination of the key component without noticeable damage to the packaging.	<report findings="" here=""></report>	1				
<b>21-3.1.b</b> Inspect any tamper-evident packaging used to secure key components—e.g., is the package sufficiently opaque to prevent reading of a component—and ensure that it prevents the determination of the key component without visible damage to the packaging.	<report findings="" here=""></report>					
<b>21-3.1.c</b> Interview responsible personnel to determine that clear-text key components do not exist in non-secure containers such as databases or in software programs.	<report findings="" here=""></report>					
<b>21-3.1.d</b> Confirm that start-up instructions and other notes used by service technicians do not contain initialization-key values written in the clear (e.g., at the point in the checklist where the keys are entered).	<report findings="" here=""></report>					



and Test Procedures       Assessor's Response       In Place       I	Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Finding (check one)					
accessible only by the custodian and/or designated backup(s).       Note: Furniture-based locks or containers with a limited set of unique keys—for example, desk drawers—are not sufficient to meet this requirement.       Image: Control in the series in the seri		Assessor's Response	In Place		N/A			
sufficient to meet this requirement.       Components/shares for a specific key that are stored in separate envelopes, but within the same secure container, place reliance upon procedural controls and do not meet the requirement for physical barriers.       Image: Containers in the secure container and verify the following: <ul> <li>Report Findings Here&gt;</li> <li>Stach secure container is accessible only by the custodian and/or designated backup(s).</li> <li>Each secure container is accessible only by the custodian and/or designated backup(s).</li> <li>Stach secure container is accessible only by the custodian and/or designated backup(s).</li> <li>Stach secure container is accessible only by the custodian and/or designated backup(s).</li> <li>Stach secure container is accessible only by the custodian and/or designated backup(s).</li> <li>Stach secure container is accessible on a token, and an access code (e.g., a PIN or similar access-control mechanism) is used to access the token, only that token's owner—or designated backup(s).</li> <li>Stach secure container is accessible on a token, and an access code (PIN or similar mechanism) is used to access the token, only that token's owner—or designated backup(s).</li> <li>Stach secure control and observe implemented processes to verify that if a key is stored on a token, and an access code.</li> </ul> <li> <ul> <li></li></ul></li>	accessible only by the custodian and/or designated backup(s).							
place reliance upon procedural controls and do not meet the requirement for physical barriers.       Image: Controls and do not meet the requirement for physical barriers.         21-3.2 Inspect each key component/share storage container and verify the following:          Key component/shares for different custodians are stored in separate secure containers.          Each secure containers.       Each secure container is accessible only by the custodian and/or designated backup(s).         21-3.3 If a key component/share is stored on a token, and an access code (e.g., a PIN or similar access-control mechanism) is used to access the token, only that token's owner—or designated backup(s)—must have possession of both the token and its access code.       Image: I		desk drawers—are not						
<ul> <li>Key components/shares for different custodians are stored in separate secure containers.</li> <li>Each secure container is accessible only by the custodian and/or designated backup(s).</li> <li>21-3.3 If a key component/share is stored on a token, and an access code (e.g., a PIN or similar access-control container) is used to access the token, only that token's owner—or designated backup(s)—must have possession of both the token and its access code.</li> <li>21-3.3 Interview responsible personnel and observe implemented processes to verify that if a key is stored on a token, and an access code (PIN or similar mechanism) is used to access the token, only that token's owner—or designated backup(s)—has possession of both the token and its access code.</li> <li>Requirement 22: Procedures must exist and must be demonstrably in use to replace any key determined to be compromised, its subsidiary keys (those keys encrypted with the compromised key), and keys derived from the compromised key, to values not feasibly related to the original keys.</li> <li>Key-injection facilities must have written procedures to follow in the event of compromise of any key associated with the key-injection platform and process. Written procedures to follow in the event of compromise of any key associated with the key-compromise procedures must exist, and all parties involved in cryptographic key loading must be aware of those procedures. All key-compromise procedures must be documented.</li> <li>22-1 Verify documented procedures exist for replacing known or suspected compromised compromised key</li> <li>22-1 Verify documented procedures are never reloaded when there is any suspicion that either the originally loaded key</li> <li>22-1 Key components/shares are never reloaded when there is any suspicion that either the originally loaded key</li> <li>22-1 Key componented/shares are never reloaded when there is any suspicion that either the originally loaded key</li> </ul>								
containers.       Each secure container is accessible only by the custodian and/or designated backup(s).         21-3.3 If a key component/share is stored on a token, and an access code (e.g., a PIN or similar access-control mechanism) is used to access the token, only that token's owner—or designated backup(s)—must have possession of both the token and its access code. <ul> <li>21-3.3 Interview responsible personnel and observe implemented processes to verify that if a key is stored on a token, and an access code (PIN or similar mechanism) is used to access the token, only that token's owner—or designated backup(s)—must have possession of both the token and its access code.              <li><i>Report Findings Here&gt;</i> </li> </li></ul> Requirement 22:       Procedures must exist and must be demonstrably in use to replace any key determined to be compromised, its subsidiary keys (those keys encrypted with the compromised key), and keys derived from the compromised key, to values not feasibly related to the original keys. <i>Key-injection facilities must have written procedures to follow in the event of compromise of any key associated with the key-injection platform and process. must be documented.</i> 21-1 Procedures for known or suspected compromised keys must include the following: <ul> <li><i>C</i></li> </ul> 21-1 Verify documented procedures exist for replacing known or suspected compromised keys <li><i>C</i></li> <li><i>C</i></li> 22-1 Verify documented procedures exist for replacing known or suspected compromised keys <li><i>C</i></li> <li><i>C</i><td>21-3.2 Inspect each key component/share storage container and verify the following:</td><td><report findings="" here=""></report></td><td></td><td></td><td></td><td></td><td></td></li>	21-3.2 Inspect each key component/share storage container and verify the following:	<report findings="" here=""></report>						
backup(s).         21-3.3 If a key component/share is stored on a token, and an access code (e.g., a PIN or similar access-control mechanism) is used to access the token, only that token's owner—or designated backup(s)—must have possession of both the token and its access code. <ul> <li>21-3.3 Interview responsible personnel and observe implemented processes to verify that if a key is stored on a token, and an access code (PIN or similar mechanism) is used to access the token, only that token's owner—or designated backup(s)—has possession of both the token and its access code.              <li>Report Findings Here&gt;             </li> </li></ul> Requirement 22:       Procedures must exist and must be demonstrably in use to replace any key determined to be compromised, its subsidiary keys (those keys encrypted with the compromised key), and keys derived from the compromised key, to values not feasibly related to the original keys.         Key-injection facilities must have written procedures to follow in the event of compromise of any key associated with the key-injection platform and process. Written procedures must exist, and all parties involved in cryptographic key loading must be aware of those procedures. All key-compromise procedures must be documented.         22-1 Procedures for known or suspected compromised keys must include the following:  De occotters is and must be demonstrably in use to replace a								
mechanism) is used to access the token, only that token's owner—or designated backup(s)—must have possession       Image: Content of the token and its access code.         21-3.3 Interview responsible personnel and observe implemented processes to verify that if a key is stored on a token, and an access code (PIN or similar mechanism) is used to access the token, only that token's owner—or designated backup(s)—has possession of both the token and its access code.          Requirement 22:       Procedures must exist and must be demonstrably in use to replace any key determined to be compromised, its subsidiary keys (those keys encrypted with the compromised key), and keys derived from the compromised key, to values not feasibly related to the original keys.         Key-injection facilities must have written procedures to follow in the event of compromise of any key associated with the key-injection platform and process. Written procedures must exist, and all parties involved in cryptographic key loading must be aware of those procedures. All key-compromise procedures must be documented.         22-1 Procedures for known or suspected compromised keys must include the following:              22-1 Verify documented procedures exist for replacing known or suspected compromised keys that include all of the following:                                  <								
21-3.3 Interview responsible personnel and observe implemented processes to verify that if a key is stored on a token, and an access code (PIN or similar mechanism) is used to access the token, only that token's owner—or designated backup(s)—has possession of both the token and its access code.	mechanism) is used to access the token, only that token's owner-or designated backup(							
that if a key is stored on a token, and an access code (PIN or similar mechanism) is used to access the token, only that token's owner—or designated backup(s)—has possession of both the token and its access code.       Image: Comparison of the token and its access code.         Requirement 22:       Procedures must exist and must be demonstrably in use to replace any key determined to be compromised, its subsidiary keys (those keys encrypted with the compromised key), and keys derived from the compromised key, to values not feasibly related to the original keys.         Key-injection facilities must have written procedures to follow in the event of compromise of any key associated with the key-injection platform and process. Written procedures must exist, and all parties involved in cryptographic key loading must be aware of those procedures. All key-compromise procedures must be documented.         22-1 Procedures for known or suspected compromised keys must include the following:       Image: Comparison of the following:         22-1 Verify documented procedures exist for replacing known or suspected compromised keys that include all of the following:       Image: Comparison comparis								
keys encrypted with the compromised key), and keys derived from the compromised key, to values not feasibly related to the original keys.         Key-injection facilities must have written procedures to follow in the event of compromise of any key associated with the key-injection platform and process. Written procedures must exist, and all parties involved in cryptographic key loading must be aware of those procedures. All key-compromise procedures must be documented.         22-1 Procedures for known or suspected compromised keys must include the following: <ul> <li></li></ul>	that if a key is stored on a token, and an access code (PIN or similar mechanism) is used to access the token, only that token's owner—or designated backup(s)—has	<report findings="" here=""></report>						
Written procedures must exist, and all parties involved in cryptographic key loading must be aware of those procedures. All key-compromise procedures must be documented.         22-1 Procedures for known or suspected compromised keys must include the following:       □	keys encrypted with the compromised key), and keys derived from							
22-1 Verify documented procedures exist for replacing known or suspected compromised keys that include all of the following: <td>Written procedures must exist, and all parties involved in cryptographic key loading m</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>	Written procedures must exist, and all parties involved in cryptographic key loading m							
keys that include all of the following:         22-1.1 Key components/shares are never reloaded when there is any suspicion that either the originally loaded key	22-1 Procedures for known or suspected compromised keys must include the following:							
	<b>22-1</b> Verify documented procedures exist for replacing known or suspected compromised keys that include all of the following:	<report findings="" here=""></report>						
		r the originally loaded key						



Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Sum	mary of a	Assessn heck one		lings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>22-1.1</b> Interview responsible personnel and observe implemented processes to verify key components are never reloaded when there is any suspicion that either the originally loaded key or the SCD has been compromised.	<report findings="" here=""></report>		·			
<b>22-1.2</b> If unauthorized alteration is suspected, new keys are not installed until the SCD has assurance reached that the equipment has not been subject to any form of unauthorized						
<b>22-1.2</b> Interview responsible personnel and observe implemented processes to verify that if unauthorized alteration is suspected, new keys are not installed until the SCD has been inspected and assurance reached that the equipment has not been subject to any form of unauthorized modification.	<report findings="" here=""></report>					
<b>22-1.3</b> A secret or private cryptographic key must be replaced with a new key whenever to original key is known. Suspected compromises must be assessed, and the analysis form compromise is confirmed, the key must be replaced. In addition, all keys encrypted under must be replaced with a new key within the minimum feasible time. The replacement key irreversible transformation of the original key. Compromised keys must not be used to fact new key(s).	ally documented. If r or derived using that key must not be a variant or an					
<b>Note</b> : The compromise of a key must result in the replacement and destruction of that ke reversible transformations of that key, as well as all keys encrypted under or derived from						
Known or suspected substitution of a secret key must result in the replacement of that ke of how the key was substituted, any associated key-encipherment keys that may have be						
<b>22-1.3</b> Interview responsible personnel and observe implemented processes to verify that if compromise of the cryptographic key is suspected, an assessment and analysis is performed. If compromise is confirmed, all the following are performed:	<report findings="" here=""></report>					
Use of that key is halted, and the key is replaced with a new unique key.						
<ul> <li>Any systems, devices, or processing involving subordinate keys that have been calculated, derived, or otherwise generated, loaded, or protected using the compromised key are included in the key-replacement process.</li> </ul>						
• The replacement key must not be a variant of the original key, or an irreversible transformation of the original key.						



Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>22-1.4</b> A documented escalation process and notification to organizations that currently s shared the key(s), including:	hare or have previously								
Identification of key personnel									
A damage assessment including, where necessary, the engagement of outside cons	ultants								
• Specific actions to be taken with system software and hardware, encryption keys, encrypted data, etc.									
<b>22-1.4.a</b> Interview responsible personnel and examine documented procedures to verify key personnel are identified and that the escalation process includes notification to organizations that currently share or have previously shared the key(s).	escalation process includes notification				·				
22-1.4.b Verify notifications include the following: <a><report findings="" here=""></report></a>									
<ul> <li>A damage assessment including, where necessary, the engagement of outside consultants.</li> </ul>									
<ul> <li>Details of specific actions to be taken with system software and hardware, encryption keys, encrypted data, etc.</li> </ul>									
22-1.5 Identification of specific events that would indicate a compromise may have occur include but are not limited to:	red. Such events must								
Missing secure cryptographic devices									
• Tamper-evident seals or authenticable envelope numbers or dates and times not ag	eeing with log entries								
<ul> <li>Tamper-evident seals or authenticable envelopes that have been opened without au attempts to open or penetrate</li> </ul>	thorization or show signs of								
<ul> <li>Indications of physical or logical access attempts to the processing system by unautlentities</li> </ul>	norized individuals or								
<ul> <li>Failure to document that a secret or private key has been managed using the princip knowledge from its date of creation</li> </ul>	les of dual control and split								



PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>22-1.5</b> Interview responsible personnel and examine documented procedures to verify that specific events that may indicate a compromise are identified. This must include, as a minimum, the following events:	<report findings="" here=""></report>					-		
Missing SCDs								
<ul> <li>Tamper-evident seals or authenticable envelope numbers or dates and times not agreeing with log entries</li> </ul>								
<ul> <li>Tamper-evident seals or authenticable envelopes that have been opened without authorization or show signs of attempts to open or penetrate</li> </ul>								
<ul> <li>Indications of physical or logical access attempts to the processing system by unauthorized individuals or entities</li> </ul>								
Failure to document that a secret or private key has been managed using the principles of dual control and split knowledge from its date of creation								
<b>22-2</b> If attempts to load a secret key or key component into a KLD or POI fail, the same key loaded into a replacement device unless it can be ensured that all residue of the key or comfrom or otherwise destroyed in the original KLD or POI								
<b>22-2</b> Interview responsible personnel and observe implemented processes to verify that if attempts to load a secret key or key component into a KLD or POI fail, the same key or component is not loaded into a replacement device unless it can be ensured that all residue of the key or component has been erased from or otherwise destroyed in the original KLD or POI.	<report findings="" here=""></report>	·	· · · · · · · · · · · · · · · · · · ·		·	·		



	Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
Requirement 23:	rement 23: Keys generated using reversible key-calculation methods, such as key variants, must only be used in SCDs that possess the original								
		Keys generated using reversible key-calculation methods must not be used at different levels of the key hierarchy. For example, a varia of a key-encryption key used for key exchange must not be used as a working key or as a Master File Key for local storage.							
	Keys generated using a non-reversible process, such as key-derivation or transformation process with a base key using an encipher process, are not subject to these requirements.								
same manner as the key may be used for reversible transform <b>Note:</b> Exposure of k	ated with a reversible process (such as a variant of a key) of another key original key—that is, under the principles of dual control and split know or different purposes but must not be used at different levels of the key h ations must not generate key-encipherment keys from PIN keys. The set of the terms of another (key-generation key). To limit this is that have been generated under that key-generation key. To limit this is	vledge. Variants of the same ierarchy. For example, ation) key can result in the							
	key variants, the reversible transforms of a key must be secured in the								
	umented procedures and interview responsible personnel to keys are generated using reversible key-calculation methods.	<report findings="" here=""></report>	1	1	1	1			
	cesses to verify that any key generated using a reversible process of cted under the principles of dual control and split knowledge.	<report findings="" here=""></report>							
must not be used ex variants used by hos	by host processing systems for encipherment of keys for local storage— ternal to the (logical) configuration that houses the MFK itself. For exar st processing systems for encipherment of keys for local storage shall n ey conveyance between platforms that are not part of the same logical	xample, MFKs and their all not be used for other							



Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>23-2.a</b> Interview responsible personnel to determine which host MFKs keys exist as variants.	<report findings="" here=""></report>							
<b>Note:</b> Some HSMs may automatically generate variants or control vectors for specific keys, but it is still up to the entity to specify exact usage.								
23-2.b Examine vendor documentation to determine support for key variants.	<report findings="" here=""></report>							
<b>23-2.c</b> Via examination of the network schematic detailing transaction flows with the associated key usage and identification of the sources of the keys used, determine that variants of the MFK are not used external to the logical configuration that houses the MFK.	<report findings="" here=""></report>							
<b>23-3</b> Reversible key transformations are not used across different levels of the key hierarch transformations must not generate working keys (e.g., PEKs) from key-encrypting keys.	y. For example, reversible							
Such transformations are only used to generate different types of key-encrypting keys from or working keys with different purposes from another working key.	an initial key-encrypting key							
<b>Note:</b> Using transformations of keys across different levels of a key hierarchy—for example from a key-encrypting key—increases the risk of exposure of each of those keys.	e, generating a PEK key							
It is acceptable to use one "working" key to generate multiple reversible transforms to be us keys, such as a PIN key, MAC key(s), and data key(s) (where a different reversible transford different working key). Similarly, it is acceptable to generate multiple key-encrypting keys fr key. However, it is not acceptable to generate working keys from key-encrypting keys.	m is used to generate each							
<b>23-3</b> Examine documented key-transformation procedures and observe implemented processes to verify that reversible key transformations are not used across different levels of the key hierarchy, as follows:	<report findings="" here=""></report>	I						
Variants used as KEKs must only be calculated from other key-encrypting keys.								
Variants of working keys must only be calculated from other working keys.								
Requirement 24: Secret and private keys and key components that are no longer u	sed or have been replaced r	nust be s	ecurely d	estroyed.				
<b>24-1</b> Instances of secret or private keys, and their key components, that are no longer used by a new key must be destroyed.	or that have been replaced							



Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>24-1.a</b> Verify documented procedures are in place for destroying secret or private keys, and their key components that are no longer used or that have been replaced by a new key.	<report findings="" here=""></report>				• •	-		
<b>24-1.b</b> Identify a sample of keys and key components that are no longer used or have been replaced. For each item in the sample, interview responsible personnel and examine key-history logs and key-destruction logs to verify that all keys have been destroyed.	<report findings="" here=""></report>							
<b>24-1.c</b> Examine storage locations for the sample of destroyed keys to verify they are no longer kept.	<report findings="" here=""></report>							
<ul><li>24-2 The procedures for destroying key components or shares that are no longer used or h key must be documented and sufficient to ensure that no part of the key or component can components, this must be accomplished by use of a cross-cut shredder, pulping or burning sufficient.</li><li>Note: Key destruction for keys installed in HSMs and POI devices is addressed in Required</li></ul>	be recovered. For written Strip-shredding is not							
<b>24-2.a</b> Examine documented procedures for destroying keys and confirm they are sufficient to ensure that no part of the key or component can be recovered.	<report findings="" here=""></report>	I	I		1	I		
<b>24-2.b</b> Observe key-destruction processes to verify that no part of the key or component can be recovered.	<report findings="" here=""></report>							
<b>24-2.1</b> Keys on all other storage media types in all permissible forms—physically secured electronic DB backups of cryptograms), or components—must be destroyed following the ISO–9564 or ISO–11568.								
For example, keys (including components or shares) maintained on paper must be burne crosscut shredder.	d, pulped, or shredded in a							
<b>24-2.1.a</b> Examine documented procedures for destroying keys and confirm that keys on all other storage media types in all permissible forms—physically secured, enciphered, or components—must be destroyed following the procedures outlined in ISO–9564 or ISO–11568.	<report findings="" here=""></report>		<u>.</u>		-			
<b>24-2.1.b</b> Observe key-destruction processes to verify that keys on all other storage media types in all permissible forms—physically secured, enciphered, or components—are destroyed following the procedures outlined in ISO–9564 or ISO–11568.	<report findings="" here=""></report>							



Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>24-2.2</b> The key-destruction process must be observed by a third party other than the cust that key. I.e., the third party must not be a key custodian for any part of the key being destruction.								
<b>24-2.2.a</b> Observe the key-destruction process and verify that it is witnessed by a third party other than a key custodian for any component of that key.	<report findings="" here=""></report>							
<b>24-2.2.b</b> Inspect key-destruction logs and verify that a third-party, non-key-custodian witness signs an affidavit as a witness to the key destruction process.	<report findings="" here=""></report>							
<b>24-2.3</b> Key components for keys other than the HSM or KLD MFKs that have been succe confirmed as operational must also be destroyed, unless the HSM does not store the end database but only stores the subordinate keys internal to the HSM. BDKs used in KLDs r components where necessary to reload the KLD.	rypted values on a							
<b>24-2.3.a</b> Verify documented procedures exist for destroying key components of keys, once the keys are successfully loaded and validated as operational.	<report findings="" here=""></report>							
<b>24-2.3.b</b> Observe key-conveyance/loading processes to verify that any key components are destroyed once the keys are successfully loaded and validated as operational.	<report findings="" here=""></report>							
Requirement 25:Access to secret and private cryptographic keys and key materiala.Limited to a need-to-know basis so that the fewest numberb.Protected such that no other person (not similarly entrusted	of key custodians are necess with that component) can of	•						
<b>25-1</b> To reduce the opportunity for key compromise, limit the number of key custodians to the operational efficiency. For example:	ne minimum required for							
<b>25-1</b> Interview key custodians and key-management supervisory personnel and observe implemented processes to verify the following:	<report findings="" here=""></report>							
<b>25-1.1</b> Designate key custodian(s) for each component, such that the fewest number (e.g., key custodians are assigned as necessary to enable effective key management. Key custod contracted personnel								



Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
25-1.1 Examine key-custodian assignments for each component to verify that:	<report findings="" here=""></report>				· · · · ·			
Key custodian(s) are designated for each component.								
• The fewest number of key custodians is assigned as necessary to enable effective key management.								
<ul> <li>Assigned key custodians are employees or contracted personnel</li> </ul>								
25-1.2 Document this designation by having each custodian and backup custodian sign a	a key-custodian form.							
<b>25-1.2.a</b> Examine completed key-custodian forms to verify that key custodians sign the form.	<report findings="" here=""></report>							
<b>25-1.2.b</b> Examine completed key-custodian forms to verify that backup custodians sign the form.	<report findings="" here=""></report>							
25-1.3 Each key-custodian form provides the following:								
Specific authorization for the custodian								
<ul> <li>Identification of the custodian's responsibilities for safeguarding key components or entrusted to them</li> </ul>	other keying material							
Signature of the custodian acknowledging their responsibilities								
An effective date for the custodian's access								
Signature of management authorizing the access								
25-1.3 Examine all key-custodian forms to verify that they include the following:	<report findings="" here=""></report>							
Specific authorization for the custodian								
<ul> <li>Identification of the custodian's responsibilities for safeguarding key components or other keying material entrusted to them</li> </ul>								
Signature of the custodian acknowledging their responsibilities								
An effective date for the custodian's access								
Signature of management authorizing the access								



Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details:	Sum	Summary of Assessment Findings (check one)					
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<ul> <li>25-1.4 In order for key custodians to be free from undue influence in discharging their cust custodians sufficient to form the necessary threshold to create a key must not directly rep. For example, for a key managed as three components, at least two individuals report to c of-n scheme (which must use a recognized secret-sharing scheme such as Shamir), such to form the key, key custodians sufficient to form the threshold necessary to form the key individual.</li> <li>The components collectively held by an individual and his or her direct reports shall not con not provide any information about the value of the key that is not derivable from a single of Custodians must not become a custodian for a component/share of a key where the cust or is currently a custodian for another component/share of that key if that would collective form the actual key.</li> <li>When the overall organization is of insufficient size such that the reporting structure cann procedural controls can be implemented.</li> <li>Organizations that are of insufficient size that they cannot support the reporting-structure</li> <li>Ensure key custodians do not report to each other (i.e., the manager cannot also be</li> <li>Receive explicit training to instruct them from sharing key components with their dire</li> <li>Sign key-custodian agreements that include an attestation to the requirement; and</li> <li>Receive training that includes procedures to report any violations.</li> </ul>	bort to the same individual. different individuals. In an m- th as three of five key shares must not report to the same constitute a quorum (or shall component). odian has previously been ely constitute a quorum to ot support this requirement, requirement must: a key custodian);							
<ul> <li>25-1.4.a Examine key-custodian assignments and organization charts to confirm the following:</li> <li>Key custodians that form the necessary threshold to create a key do not directly report to the same individual.</li> <li>Neither direct reports nor the direct reports in combination with their immediate supervisors possess the necessary threshold of key components sufficient to form any given key.</li> <li>Key custodians are not and have not been a custodian for another component/share of a key where that collectively would constitute a quorum to form the actual key.</li> </ul>	<report findings="" here=""></report>				<u> </u>			



Annex B, Control Objective 6 PCI PIN Security Requirements and Test Procedures	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>25-1.4.b</b> For organizations that are such a small, modest size that they cannot support the reporting-structure requirement, ensure that documented procedures exist and are followed to:	<report findings="" here=""></report>							
Ensure key custodians do not report to each other.								
<ul> <li>Receive explicit training to instruct them from sharing key components with their direct manager.</li> </ul>								
Sign key-custodian agreement that includes an attestation to the requirement.								
Ensure training includes procedures to report any violations.								

**Requirement 26:** Logs must be kept for any time that keys, key components, or related materials are removed from storage or loaded to an SCD.

Key-injection facilities must maintain logs for the key management of all keys and keying material used in all key-loading sessions. These include keys and materials removed from safes and used in the loading process.

<b>26-1</b> Logs must be kept whenever keys, key components, or related materials are removed from secure storage or loaded to an SCD. These logs must be archived for a minimum of two years subsequent to key destruction.				
At a minimum, logs must include the following:				
Date and time in/out				
Key-component identifier				
Purpose of access				
<ul> <li>Name and signature of custodian accessing the component</li> </ul>				
<ul> <li>Name and signature of a non-custodian (for that component/share) witness</li> </ul>				
<ul> <li>Tamper-evident and authenticable package number (if applicable)</li> </ul>				
<b>26-1.a</b> Examine log files and audit log settings to verify that logs are kept for any time that keys, key components, or related materials are:	9>		·	
Removed from secure storage				
Loaded to an SCD				



	Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
	and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not ir Place		
26-1.b Examine log	files and audit log settings to verify that logs include the following:	<report findings="" here=""></report>							
<ul> <li>Date and time i</li> </ul>	in/out								
<ul> <li>Key-componen</li> </ul>	it identifier								
<ul> <li>Purpose of acc</li> </ul>	ess								
<ul> <li>Name and sign</li> </ul>	nature of custodian accessing the component								
Name and sign	ature of a non-custodian (for that component/share) witness								
Tamper-eviden	t and authenticable package number (if applicable)								
27-1 If backup copie	<b>Note:</b> It is not a requirement to have backup copies of key composes of secret and/or private keys exist, they must be maintained in accord	-							
	e followed for the primary keys.								
•	onsible personnel and examine documented procedures and backup e whether any backup copies of keys or their components exist. ng:	<report findings="" here=""></report>			<u>.</u>		-		
	up processes to verify backup copies of secret and/or private keys are accordance with the same requirements as are followed for the primary								
	storage locations and access controls or otherwise verify through documented procedures and interviews of personnel that backups are follows:								
<ul> <li>Securely</li> </ul>	stored with proper access controls								
<ul> <li>Under at I</li> </ul>	least dual control								
-	o at least the same level of security control as operational keys as in this document								
27-2 If backup copie	es are created, the following must be in place:								
<ul> <li>Creation (include)</li> </ul>	ding cloning) must require a minimum of two authorized individuals to er	nable the process.							



Annex B, Control Objective 6 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)						
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>27-2</b> Interview responsible personnel and observe backup processes to verify the following:	<report findings="" here=""></report>	-	·					
<ul> <li>The creation of any backup copies requires at least two authorized individuals to enable the process.</li> </ul>								
<ul> <li>All requirements applicable for the original keys also apply to any backup copies of keys and their components.</li> </ul>								
Requirement 28: Documented procedures must exist and be demonstrably in use	for all key-administration ope	erations.						
<b>28-1</b> Written procedures must exist, and all affected parties must be aware of those proced key administration must be documented. This includes all aspects of key administration, a								
Training of all key custodians with regard to their responsibilities, and forming part of t	heir annual security training							
<ul> <li>Role definition—nominated individual with overall responsibility</li> </ul>								
Background checks for personnel								
<ul> <li>Management of personnel changes, including revocation of access control and other p move</li> </ul>	privileges when personnel							
<b>28-1.a</b> Examine documented procedures for key-administration operations to verify they include:	<report findings="" here=""></report>							
<ul> <li>Training of all key custodians regarding their responsibilities, and forming part of their annual security training</li> </ul>								
Role definition—nominated individual with overall responsibility								
Background checks for personnel								
<ul> <li>Management of personnel changes, including revocation of access control and other privileges when personnel move</li> </ul>								
<b>28-1.b</b> Interview personnel responsible for key-administration operations to verify that the documented procedures are known and understood.	<report findings="" here=""></report>							
<b>28-1.c</b> Interview personnel to verify that security-awareness training is provided for the appropriate personnel.	<report findings="" here=""></report>							
<b>28-1.d</b> Interview responsible HR personnel to verify background checks are conducted (within the constraints of local laws).	<report findings="" here=""></report>							



Control Objective 7: Equipment used to process PINs and keys is managed in a secure manner.

	Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>Requirement 29:</b> PIN-processing equipment (e.g., POI devices and HSMs) must be placed into service only if there is assurance that the equipment has not been substituted or subjected to unauthorized modifications or tampering prior to the deployment of the device—both prior to and subsequent to the loading of cryptographic keys—and that precautions are taken to minimize the threat of compromise once deployed.									
Key-injection facilities must ensure that only legitimate, unaltered devices are loaded with cryptographic keys. Secure rooms must be established for inventory that includes securing PEDs that have not had keys injected. The area must have extended walls from the real floor to the real ceiling using sheetrock, wire mesh, or equivalent. Equivalence can be steel cages extending floor to real ceiling. The cages can have a steel cage top in lieu of the sides extending to the real ceiling. The cages must have locks (with logs) or badge control with logging for entry.									
<b>29-1</b> Secure cryptographic devices—such as HSMs and POI devices (e.g., PEDs and ATMs)—must be placed into service only if there is assurance that the equipment has not been subject to unauthorized modification, substitution, or tampering and has not otherwise been subject to misuse prior to deployment.									
	umented procedures to confirm that processes are defined to assurances prior to the loading of cryptographic keys:	<report findings="" here=""></report>							
<ul> <li>POIs have not b tampering.</li> </ul>	peen substituted or subjected to unauthorized modifications or								
	key injection/loading or code signing have not been substituted or authorized modifications or tampering.								
	cesses and interview personnel to verify that processes are followed ing assurances prior to the loading of cryptographic keys:	<report findings="" here=""></report>							
<ul> <li>POIs have not b tampering.</li> </ul>	been substituted or subjected to unauthorized modifications or								
	key injection/loading or code signing have not been substituted or authorized modifications or tampering.								
	ust be protected against compromise. Any compromise must be detect after the compromise must be prevented. ude the following:	ed. Loading and use of							
	ocumented procedures to verify controls are defined to protect POIs om unauthorized access up to point of deployment.	<report findings="" here=""></report>							



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>29-1.1.1</b> Access to all POIs and other SCDs is documented, defined, logged, and controlled such that unauthorized individuals cannot access, modify, or substitute any device without detection. The minimum log contents include date and time, object name/identifier, purpose, name of individual(s) involved, signature or electronic capture (e.g., badge) of individual involved and if applicable, tamper-evident package number(s) and serial number(s) of device(s) involved. Electronic logging—e.g., using bar codes—is acceptable for device tracking.									
<b>29-1.1.1.a</b> Examine access-control documentation and device configurations to verify that access to all POIs and key-injection/loading devices is defined and documented.	<report findings="" here=""></report>								
<b>29-1.1.1.b</b> For a sample of POIs and other SCDs, observe authorized personnel accessing devices and examine access logs to verify that access to all POIs and other SCDs is logged.	<report findings="" here=""></report>								
<b>29-1.1.1.c</b> Examine implemented access controls to verify that unauthorized individuals cannot access, modify, or substitute any POI or other SCD.	<report findings="" here=""></report>								
and authorized by management. A documented security policy must exist that require personnel with authorized access to all secure cryptographic devices. This includes de	<b>29-1.1.3</b> All personnel with access to POIs and other SCDs prior to deployment are documented in a formal list and authorized by management. A documented security policy must exist that requires the specification of personnel with authorized access to all secure cryptographic devices. This includes documentation of all personnel with access to POIs and other SCDs as authorized by management. The list of authorized personnel is								
<ul> <li>29-1.1.3.a Examine documented authorizations for personnel with access to devices to verify that prior to deployment:</li> <li>All personnel with access to POIs and other SCDs are authorized by management in an auditable manner.</li> <li>The authorizations are reviewed annually.</li> </ul>	<report findings="" here=""></report>	1	1	1					
<b>29-1.1.3.b</b> For a sample of POIs and other SCDs, examine implemented access controls to verify that only personnel documented and authorized in an auditable manner have access to devices.	<report findings="" here=""></report>								
<b>29-1.2</b> POIs and other SCDs must not use default keys or data (such as keys that are propurposes) or passwords/authentication codes.	re-installed for testing								



PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>29-1.2.a</b> Examine vendor documentation or other information sources to identify default keys (such as keys that are pre-installed for testing purposes), passwords, or data.	<report findings="" here=""></report>							
<b>29-1.2.b</b> Observe implemented processes and interview personnel to verify that default keys or passwords are not used.	<report findings="" here=""></report>							
<b>29-2</b> Implement a documented "chain of custody" to ensure that all devices are controlled from receipt to placement into service.								
The chain of custody must include records to identify responsible personnel for each intera	action with the devices.							
<b>Note:</b> Chain of custody includes procedures, as stated in Requirement 29-1, that ensure to devices and other SCDs is documented, defined, logged, and controlled such that unauthor access, modify, or substitute any device without detection.								
<b>29-2.a</b> Examine documented processes to verify that the chain of custody is required for devices from receipt to placement into service.	<report findings="" here=""></report>	1	1	1	1	1		
<b>29-2.b</b> For a sample of devices, examine documented records and interview responsible personnel to verify the chain of custody is maintained from receipt to placement into service.	<report findings="" here=""></report>							
<b>29-2.c</b> Verify that the chain-of-custody records identify responsible personnel for each interaction with the device.	<report findings="" here=""></report>							



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>29-3</b> Implement physical protection of devices from the manufacturer's facility up to the point of key-insertion and deployment, through one or more of the following:								
<ul> <li>Transportation using a trusted courier service (for example, via bonded carrier). The d stored until key-insertion and deployment occurs.</li> </ul>	evices are then securely							
<ul> <li>Use of physically secure and trackable packaging (for example, pre-serialized, counterfeit-resistant, tamper- evident packaging). The devices are then stored in such packaging, or in secure storage, until key insertion and deployment occurs.</li> </ul>								
<ul> <li>A secret, device-unique "transport-protection token" is loaded into the secure storage area of each device at the manufacturer's facility. The SCD used for key-insertion verifies the presence of the correct "transport-protection token" before overwriting this value with the initial key, and the device is further protected until deployment.</li> </ul>								
<ul> <li>Shipped and stored containing a secret that:</li> </ul>								
<ul> <li>Is immediately and automatically erased if any physical or functional alteration to and</li> </ul>	the device is attempted,							
<ul> <li>Can be verified by the initial key-loading facility, but that cannot feasibly be deter personnel.</li> </ul>	mined by unauthorized							
<ul> <li>Each cryptographic device is carefully inspected and tested immediately prior to key-ir using due diligence. This is done to provide reasonable assurance that it is the legitim not been subject to any unauthorized access or modifications.</li> </ul>								
Note: Unauthorized access includes that by customs officials.								
<ul> <li>Devices incorporate self-tests to ensure their correct operation. Devices must no there is assurance they have not been tampered with or compromised.</li> </ul>	t be re-installed unless							
Note: This control must be used in conjunction with one of the other methods.								
<ul> <li>Controls exist and are in use to ensure that all physical and logical controls and a used are not modified or removed.</li> </ul>	anti-tamper mechanisms							
<b>29-3.a</b> Examine documented procedures to confirm that they require physical protection of devices from the manufacturer's facility up to the point of key-insertion and deployment, through one or more of the defined methods.	<report findings="" here=""></report>							
<b>29-3.b</b> Interview responsible personnel to verify that one or more of the defined methods are in place to provide physical device protection for devices, from the manufacturer's facility up to the point of key-insertion and deployment.	<report findings="" here=""></report>							



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>29-4</b> Dual-control mechanisms must exist to prevent substitution or tampering of HSMs—both deployed and spare or back-up devices—throughout their life cycle. Procedural controls, which may be a combination of physical barriers and logical controls, may exist to support the prevention and detection of substituted HSMs but must not supplant the implementation of dual-control mechanisms.								
<b>29-4.a</b> Examine documented procedures to confirm that dual-control mechanisms exist to prevent substitution or tampering of HSMs—both deployed and spare or back-up devices—throughout their life cycle.	<report findings="" here=""></report>							
<b>29-4.b</b> Interview responsible personnel and physically verify the dual-control mechanism used to prevent substitution or tampering of HSMs—both in service and spare or back-up devices—throughout their life cycle.	<report findings="" here=""></report>							
<b>29-4.1</b> HSM serial numbers must be compared to the serial numbers documented by the different communication channel from the device) to ensure device substitution has not e serial-number verification must be maintained.								
<b>Note:</b> Documents used for this process must be received via a different communication document used must not have arrived with the equipment. An example of how serial nurby the sender includes but is not limited to the manufacturer's invoice or similar document.	mbers may be documented							
<b>29-4.1.a</b> Interview responsible personnel to verify that device serial numbers are compared to the serial number documented by the sender.	<report findings="" here=""></report>	•	<u>.</u>	-	·			
<b>29-4.1.b</b> For a sample of received devices, examine sender documentation sent via a different communication channel than the device's shipment (for example, the manufacturer's invoice or similar documentation) used to verify device serial numbers. Examine the record of serial-number validations to confirm the serial number for the received device was verified to match that documented by the sender.	<report findings="" here=""></report>							



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)							
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>29-4.2</b> The security policy enforced by the HSM must not allow unauthorized or unnecessary functions. HSM API functionality and commands that are not required to support specified functionality must be disabled before the equipment is commissioned.									
<ul> <li>For example, for HSMs used in transaction processing operations:</li> <li>PIN-block format translation functionality is in accordance with Requirement 3, or non-ISO PIN-block formats must not be supported without a defined documented and approved business need.</li> </ul>									
<ul> <li>HSMs used for acquiring functions shall not be configured to output clear-text PINs or functionality.</li> </ul>	r support PIN-change								
Documentation (e.g., a checklist or similar suitable to use as a log) of configuration settings must exist and be signed and dated by personnel responsible for the implementation. This documentation must include identifying information for the HSM, such as serial number and/or asset identifiers. This documentation must be retained and updated for each affected HSM any time changes to configuration settings would impact security.									
29-4.2.a Obtain and examine the defined security policy to be enforced by the HSM.	<report findings="" here=""></report>								
<b>29-4.2.b</b> Examine documentation of the HSM configuration settings from past commissioning events to determine that the functions and commands enabled are in accordance with the security policy.	<report findings="" here=""></report>	port Findings Here>							
<b>29-4.2.c</b> For a sample of HSMs, examine the configuration settings to determine that only authorized functions are enabled.	<report findings="" here=""></report>								
<b>29-4.2.d</b> Verify that PIN-change functionality, PIN-block format translation functionality, or non-ISO PIN-block formats are not supported without a defined documented and approved business need.	<report findings="" here=""></report>								
<b>29-4.2.e</b> Verify that functionality is not enabled to allow the outputting of clear-text PINs.	<report findings="" here=""></report>								
29-4.3.f Examine documentation to verify:	<report findings="" here=""></report>								
<ul> <li>Configuration settings are defined, signed and dated by personnel responsible for implementation.</li> </ul>									
<ul> <li>It includes identifying information for the HSM, such as serial number and/or asset identifiers.</li> </ul>									
<ul> <li>The documentation is retained and updated anytime configuration setting impacting security occur for each affected HSM.</li> </ul>									



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>29-4.3</b> When HSMs are connected to online systems, controls are in place to prevent the use of an HSM to perform privileged or sensitive functions that are not available during routine HSM operations. <i>Examples of sensitive functions include but are not limited to: loading of key components, outputting clear-text key components, and altering HSM configuration.</i>								
<b>29-4.3</b> Examine HSM configurations and observe processes to verify that HSMs are not enabled in a sensitive state when connected to online systems.	<report findings="" here=""></report>					<u>.</u>		
<b>29-4.4</b> Inspect and test all HSMs—either new or retrieved from secure storage—prior to have not been tampered with or compromised. Processes must include:	installation to verify devices							
<b>29-4.4</b> Examine documented procedures to verify they require inspection and testing of HSMs prior to installation to verify integrity of device.	<report findings="" here=""></report>					<u>.</u>		
29-4.4.1 Running self-tests to ensure the correct operation of the device								
<b>29-4.4.1</b> Examine records of device inspections and test results to verify that self-tests are run on devices to ensure the correct operation of the device.	<report findings="" here=""></report>					<u>.</u>		
<b>29-4.4.2</b> Installing (or re-installing) devices only after confirming that the device has no compromised	ot been tampered with or							
<b>29-4.4.2</b> Observe inspection processes and interview responsible personnel to verify that devices are installed, or reinstalled, only after confirming that the device has not been tampered with or compromised.	<report findings="" here=""></report>	-			-			
<b>29-4.4.3</b> Physical and/or functional tests and visual inspection to confirm that physica anti-tamper mechanisms are not modified or removed	and logical controls and							
<b>29-4.4.3</b> Observe inspection processes and interview responsible personnel to confirm processes include physical and/or functional tests and visual inspection to verify that physical and logical controls and anti-tamper mechanisms are not modified or removed.	<report findings="" here=""></report>							
29-4.4.4 Maintaining records of the tests and inspections, and retaining records for at least one year								
<b>29-4.4.4.a</b> Examine records of inspections and interview responsible personnel to verify records of the tests and inspections are maintained.	<report findings="" here=""></report>	·			<u> </u>	·		



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details: Assessor's Response	Summary of Assessment Findings (check one)							
and Test Procedures		In Place	In Place w/CCW	N/A	Not Tested	Not in Place			
<b>29-4.4.4.b</b> Examine records of inspections to verify records are retained for at least one year.	<report findings="" here=""></report>		<u>.</u>						
29-5 Maintain HSMs in tamper-evident packaging or in secure storage until ready for ins	29-5 Maintain HSMs in tamper-evident packaging or in secure storage until ready for installation.								
<b>29-5.a</b> Examine documented procedures to verify they require devices be maintained in tamper-evident packaging until ready for installation.	<report findings="" here=""></report>	·							
<b>29-5.b</b> Observe a sample of received devices to verify they are maintained in tamper- evident packaging until ready for installation.	per- <report findings="" here=""></report>								
Requirement 30: Physical and logical protections must exist for deployed POI devices									

Key-injection facilities must ensure protection against unauthorized use of SCDs (e.g., HSMs) used in the key-injection platform that are capable of encrypting a key and producing cryptograms of that key.

<b>30-3</b> Processes must exist to ensure that key-injection operations are performed and reconciled on an inventory of pre-authorized devices.			
Processes must include the following:			
<ul> <li>Each production run must be associated with a predefined inventory of identified POI devices to be injected or initialized with keys.</li> </ul>			
<ul> <li>Unauthorized personnel must not be able to modify this inventory without detection.</li> </ul>			
<ul> <li>All POI devices to be initialized with keys on a production run must be identified and accounted for against the inventory.</li> </ul>			
<ul> <li>Unauthorized POI devices submitted for injection or initialized must be rejected by the injection platform and investigated.</li> </ul>			
<ul> <li>Once processed by the KIF, whether successfully initialized with keys or not, all submitted POI devices must be identified and accounted for against the inventory.</li> </ul>			
<b>Note:</b> The KIF platform must ensure that only authorized devices can ever be injected or initialized with authorized keys. Processes must prevent (1) substitution of an authorized device with an unauthorized device, and (2) insertion of an unauthorized device into a production run.			



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:		Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Respon	Se In Plac	e In Place w/CCW	N/A	Not Tested	Not in Place			
<b>30.3.a</b> Obtain and examine documentation of inventory control and monitoring procedures. Determine that the procedures cover:	<report findings="" here<="" td=""><td>&gt;</td><td></td><td></td><td></td><td></td></report>	>							
• Each production run is associated with a predefined inventory of identified devices to be injected or initialized with keys.	201								
Unauthorized personnel are not able to modify this inventory without detect	ion.								
<ul> <li>All POI devices to be initialized with keys on a production run are identified accounted for against the inventory.</li> </ul>	and								
<ul> <li>Unauthorized POI devices submitted for injection or initialized are rejected injection platform and investigated.</li> </ul>	by the								
Once processed by the KIF, whether successfully initialized with keys or not, all submitted POI devices are identified and accounted for against the inventory.									
<b>30.3.b</b> Interview applicable personnel to determine that procedures are known a followed.	nd <report findings="" here<="" td=""><td>&gt;</td><td></td><td></td><td></td><td></td></report>	>							
<b>Requirement 31:</b> Procedures must be in place and implemented to prote material within such devices—when removed from ser									
Key-injection facilities must have procedures to ensure keys are destroyed in cl in the key-injection platform, as well as to any devices that have been loaded w unnecessary and never to be placed into service.									
If a key-injection facility receives a used device to reload with keys, procedures new keys. (The used device should have had its keys destroyed when it was re destroyed.)						ng of			
<b>31-1</b> Procedures are in place to ensure that any SCDs to be removed from serv repair—are not intercepted or used in an unauthorized manner, including rende key material stored within the device irrecoverable.									
Processes must include the following:									
<b>Note:</b> Without proactive key-removal processes, devices removed from service battery-backed RAM for days or weeks. Likewise, host/hardware security modu more critically, the Master File Key—resident within these devices. Proactive key	les (HSMs) can also retain keys—al	nd							

place to delete all such keys from any SCD being removed from the network.



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Summary of Assessment Findings (check one)						
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>31-1</b> Verify that documented procedures for removing SCDs from service include the following:	<report findings="" here=""></report>							
<ul> <li>Procedures require that all secret and private keys and key material stored within the device be securely destroyed.</li> </ul>								
Procedures cover all devices removed from service or for repair.								
<b>31-1.1</b> HSMs require dual control (e.g., to invoke the system menu) to implement for all critical decommissioning processes.								
<b>31-1.1.a</b> Examine documented procedures for removing HSM from service to verify that dual control is implemented for all critical decommissioning processes.	<report findings="" here=""></report>		• •					
<b>31-1.1.b</b> Interview personnel and observe demonstration (if HSM is available) of processes for removing HSM from service to verify that dual control is implemented for all critical decommissioning processes	<report findings="" here=""></report>							
<b>31-1.2</b> Keys are rendered irrecoverable (for example, zeroized) for SCDs. If data cannot devices must be physically destroyed under dual control to prevent the disclosure of any								
<b>31-1.2</b> Interview personnel and observe demonstration of processes for removing SCDs from service to verify that all keying material is rendered irrecoverable (for example, zeroized), or that devices are physically destroyed prior to leaving the dual-control area to prevent the disclosure of any sensitive data or keys.	<report findings="" here=""></report>		1		1	1		
31-1.3 SCDs being decommissioned are tested and inspected to ensure keys have beer	rendered irrecoverable.							
<b>31-1.3</b> Interview personnel and observe processes for removing SCDs from service to verify that tests and inspections of devices are performed to confirm that keys have been rendered irrecoverable or the devices are physically destroyed.	<report findings="" here=""></report>	1	1		1	1		
31-1.4 Affected entities are notified before devices are returned.	·							
<b>31-1.4</b> Interview responsible personnel and examine device-return records to verify that affected entities are notified before devices are returned.	<report findings="" here=""></report>							
<b>31-1.5</b> Devices are tracked during the return process.								



Annex B, Control Objective 7 PCI PIN Security Requirements		Reporting Details:	Summary of Assessment Findings (check one)						
	and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place		
<b>31-1.5</b> Interview responsible personnel and examine device-return records to verify that devices are tracked during the return process.									
31-1.6 Records of the tests and inspections maintained for at least one year.									
<b>31-1.6</b> Interview personnel and observe records to verify that records of the tests and inspections are maintained for at least one year.									
Requirement 32:	Any SCD capable of encrypting a key and producing cryptograms protected against unauthorized use to encrypt known keys or kno following:								
	a. Dual access controls required to enable the key-encryption for	unction							
	b. Physical protection of the equipment (e.g., locked access to	it) under dual control							
	c. Restriction of logical access to the equipment								
Key-injection facilities must ensure protection against unauthorized use for SCDs (e.g., HSMs) used in the key-injection platform that are capable of encrypting a key and producing cryptograms of that key.									
32-1 For HSMs and	other SCDs used for the generation or loading of cryptographic keys for	or use in POI devices,							

<b>32-1</b> For HSMs and other SCDs used for the generation or loading of cryptographic keys for use in POI devices, procedures must be documented and implemented to protect against unauthorized access and use.					
Required procedures and processes include the following:					
<b>32-1</b> Examine documented procedures to confirm that they specify protection against unauthorized access and use for HSMs and other devices used for the generation or loading of cryptographic keys for use in POI devices.	<report findings="" here=""></report>				



Reporting Details:	Sum				ings
Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<ul> <li>32-1.1 Devices must not be authorized for use except under the dual control of at least two authorized people.</li> <li>Note: Dual control consists of logical and/or physical characteristics. For example, dual control may be implemented for logical access via two individuals with two different passwords/authentication codes at least five characters in length, or for physical access via a physical lock that requires two individuals, each with a different high-security key.</li> <li>For devices that do not support two or more passwords/authentication codes, this may be achieved by splitting the single password used by the device into two halves, each half controlled by a separate authorized custodian. Each half must be a minimum of five characters.</li> <li>Physical keys, authorization codes, passwords/authentication codes, or other enablers must be managed so that no one person can use both the enabler(s) and the device, which can create cryptograms of known keys or key components under a key-encipherment key used in production.</li> </ul>					
<report findings="" here=""></report>					
ve numeric and/or					
<b>32-1.2</b> Observe password policies and configuration settings to confirm that passwords/authentication codes used for dual control must be at least five numeric and/or alphabetic characters.					
<ul> <li>32-1.3 Dual control must be implemented for the following:</li> <li>To enable any manual key-encryption functions and any key-encryption functions that occur outside of normal transaction processing;</li> <li>To place the device into a state that allows for the input or output of clear-text key components;</li> <li>For all access to key-loading devices (KLDs).</li> </ul>					
	Assessor's Response wo authorized people. control may be cation codes at least five als, each with a different be achieved by splitting the authorized custodian. Each must be managed so that no of known keys or key <report findings="" here="">   ve numeric and/or   <report findings="" here=""></report></report>	Reporting Details:         Assessor's Response         In Place         wo authorized people.         control may be         cation codes at least five         als, each with a different         be achieved by splitting the         authorized custodian. Each         must be managed so that no         of known keys or key            ve numeric and/or               re numeric and/or            at occur outside of normal	Reporting Details:       (C         Assessor's Response       In Place       In Place         wo authorized people.       □       □         control may be       □       □         cation codes at least five       □       □         als, each with a different       □       □         we achieved by splitting the       □       □         authorized custodian. Each       □       □         must be managed so that no       □       □         of known keys or key       □       □         ve numeric and/or       □       □         ext occur outside of normal       □       □	Reporting Details:       (check one         Assessor's Response       In Place       In Place       N/A         wo authorized people.       □       □       □       □         control may be       □       □       □       □       □         control may be       □       <	Assessor's Response       In Place       In Place       In Place       N/A       Not Tested         wo authorized people.       □



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	· · · · · · · · · · · · · · · · · · ·					
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>32-1.3</b> Examine dual-control mechanisms and observe authorized personnel performing the defined activities to confirm that dual control is implemented for the following:	<report findings="" here=""></report>		-	-	- -	-	
<ul> <li>To enable any manual key-encryption functions, and any key-encryption functions that occur outside of normal transaction processing;</li> </ul>							
<ul> <li>To place the device into a state that allows for the input or output of clear-text key components;</li> </ul>							
For all access to KLDs.							
32-1.4 Devices must not use default passwords/authentication codes.							
<b>32-1.4.a</b> Examine password policies and documented procedures to confirm default passwords/authentication codes must not be used for HSMs, KLDs, and other SCDs used to generate or load cryptographic keys.	<report findings="" here=""></report>	1	1	1	1	1	
<b>32-1.4.b</b> Observe device configurations and interview device administrators to verify that HSMs, KLDs, and other SCDs used to generate or load cryptographic keys do not use default passwords/authentication codes.	<report findings="" here=""></report>						
32-1.5 To detect any unauthorized use, devices are at all times within a secure room an	d either:						
<ul> <li>Locked in a secure cabinet and/or sealed in tamper-evident packaging, or</li> </ul>							
<ul> <li>Under the continuous supervision of at least two authorized people who ensure that any unauthorized use of the device would be detected.</li> </ul>							
Note: POI devices may be secured by storage in the dual-control access key injection re							
<b>32-1.5.a</b> Examine documented procedures to confirm that they require devices are either:							
<ul> <li>Locked in a secure cabinet and/or sealed in tamper-evident packaging at all times, or</li> </ul>							
Under the continuous supervision of at least two authorized people at all times.							



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Sum		Assessm heck one	ment Findings ne)		
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>32-1.5.b</b> Interview responsible personnel and observe devices and processes to confirm that devices are either:	<report findings="" here=""></report>						
<ul> <li>Locked in a secure cabinet and/or sealed in tamper-evident packaging at all times, or</li> </ul>							
Under the continuous supervision of at least two authorized people at all times.							
Functionality of a key-injection facility may be located at a single physical location or distributed over a number of physical locations. Distributed KIF functionality may include key generation, CA functionality, key distribution, and key injection. In order to mitigate the expanded attack surface of a distributed KIF, specific controls apply to a distributed architecture. This may occur within a single organization or across organizations. If any secret or private keys or their components/shares appear in the clear outside of a SCD, Requirement 32-9 for a secure room must be met.							
<b>32-8</b> Distributed functionality of the KIF that is used for generation and transfer of keys must communicate via mutually authenticated channels. All key transfers between distributed KIF functions must meet the requirements of Control Objective 3.							
<b>32-8.1</b> The KIF must ensure that keys are transmitted between KIF components in acco Objective 3.	rdance with Control						
<b>32-8.1.a</b> Examine documented procedures for key conveyance or transmittal to verify that keys used between KIF components are addressed in accordance with applicable criteria in Control Objective 3.	<report findings="" here=""></report>						
<b>32-8.1.b</b> Interview responsible personnel and observe conveyance processes to verify that the documented procedures are followed for key conveyance or transmittal for keys used between KIF components.	<report findings="" here=""></report>						
<b>32-8.2</b> The KIF must implement mutually authenticated channels for communication bet functions—for example, between a host used to generate keys and a host used to distribute the set of							
<b>32-8.2</b> Examine documented procedures to confirm they specify the establishment of a channel for mutual authentication of the sending and receiving devices.							
<b>32-8.3</b> The KIF must ensure that injection of enciphered secret or private keys into POI devices meets the requirements of Control Objective 4.							
32-8.4 The channel for mutual authentication is established using the requirements of Control Objective 4.							
<b>32-8.4.a</b> Examine documented procedures for key loading to hosts and POI devices to verify that they are in accordance with applicable criteria in Control Objective 4.							



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Sum	mary of A (c	Assessn heck one		ings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>32-8.4.a</b> Interview responsible personnel and observe key-loading processes to verify that the documented procedures are followed for key conveyance or transmittal for keys used between KIF components.	<report findings="" here=""></report>					
<b>32-8.5</b> The KIF must implement a mutually authenticated channel for establishment of enkeys between POI devices and an HSM at the KIF.	nciphered secret or private					
<b>32-8.5</b> Examine documented procedures to confirm they specify the establishment of a mutually authenticated channel for establishment of enciphered secret or private keys between sending and receiving devices—e.g., POI devices and HSMs.						
<ul> <li>32-8.6 Mutual authentication of the sending and receiving devices must be performed.</li> <li>KIFs must validate authentication credentials of a POI prior to any key transport, exervite that device.</li> <li>POI devices must validate authentication credentials of KDHs prior to any key transpectablishment with that device.</li> <li>When a KLD is used as an intermediate device to establish keys between POIs and possible to insert an unauthorized SCD into the flow without detection.</li> </ul>						
<ul> <li>32-8.6 Interview responsible personnel and observe processes for establishment of enciphered secret or private keys between sending and receiving devices to verify:</li> <li>KIFs validate authentication credentials of a POI prior to any key transport, exchange, or establishment with that device.</li> <li>POI devices validate authentication credentials of KLDs prior to any key transport, exchange, or establishment with that device.</li> <li>When a KLD is used as an intermediate device to establish keys between POIs and a KIF HSM, it is not possible to insert an unauthorized SCD into the flow without detection</li> </ul>	1	I			I	
<b>32-8.7</b> Mechanisms must exist to prevent a non-authorized host from injecting keys into POIs or an unauthorized POI from establishing a key with a legitimate KIF component.						
<b>32-8.7</b> Examine documented procedures to confirm they define mechanisms to prevent an unauthorized host from performing key transport, key exchange, or key establishment with POIs.						

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Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Sum	<b>mary of A</b> (c	Assessm heck one		ngs
and Test Procedures	In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>32-9</b> The KIF must implement a physically secure room for key injection where any secret or private keys or their components/shares appear in memory outside the secure boundary of an SCD during the process of loading/injecting keys into an SCD.						
<ul> <li>The secure room for key injection must include the following:</li> <li>Effective 1 January 2021 the injection of clear-text secret or private keying material shall not be allowed for entities engaged in key injection on behalf of others. Only encrypted key injection shall be allowed for POI v3 and higher devices.</li> </ul>						
• Effective 1 January 2023, the same restriction applies to entities engaged in key injection of devices for which they are the processors.						
<b>Note:</b> This does not apply to key components entered into the keypad of a secure cryptographic device, such as a device approved against the PCI PTS POI Security Requirements. It does apply to all other methods of loading of clear-text keying material for POI v3 and higher devices.						
<b>32-9.1</b> The secure room must have walls made of solid materials. In addition, if the solid the real floor to the real ceiling, the secure room must also have extended walls from the using sheetrock or wire mesh.						
<b>Note:</b> In KIF environments where Level 1 and Level 2 physical barrier controls are in pla secure room may be implemented within a "caged" environment. A caged environment i that meets the criteria of Requirement 32 but is not made of solid walls. Refer to Norma additional information on Level 1 and Level 2 physical barrier controls. All other criteria s and 32-10 relating to clear-text secret and/or private keys and/or their components exist outside the secure boundary of an SCD for loading keys apply.	s an enclosed secure room tive Annex A: A2 for stated in Requirements 13-9					
<b>32-9.1</b> Inspect the secure room designated for key injection to verify that it is constructed with extended walls from the real floor to the real ceiling using sheetrock or wire mesh.	<report findings="" here=""></report>					
32-9.2 Any windows into the secure room must be locked and protected by alarmed sen	sors.					
<b>32-9.2.a</b> Observe all windows in the secure room to verify they are locked and protected by alarmed sensors.	<report findings="" here=""></report>					
<b>32-9.2.b</b> Examine configuration of window sensors to verify that the alarm mechanism is active.	<report findings="" here=""></report>					



Annex B, Control Objective 7 PCI PIN Security Requirements							
and Test Procedures Assessor's Response		In Place	In Place w/CCW	N/A	Not Tested	Not in Place	
<b>32-9.3</b> Any windows must be covered, rendered opaque, or positioned to prevent unaut secure room.	horized observation of the						
<b>32-9.3</b> Observe all windows in the secure room to verify they are covered, rendered opaque, or positioned to prevent unauthorized observation of the secure room.	<report findings="" here=""></report>						
<b>32-9.4</b> A solid-core door or a steel door must be installed to ensure that door hinges car outside the room.	not be removed from						
<b>32-9.4</b> Inspect the secure room to verify that it is only accessed through a solid-core or a steel door, with door hinges that cannot be removed from outside the room.	<report findings="" here=""></report>						
<ul> <li>32-9.5 An electronic access control system (for example, badge and/or biometrics) must</li> <li>Dual-access requirements for entry into the secure room, and</li> <li>Anti-pass-back requirements.</li> </ul>							
<b>32-9.5</b> Observe authorized personnel entering the secure room to verify that a badge- control system is in place that enforces the following requirements:							
<ul><li>Dual-access for entry to the secure room</li><li>Anti-pass-back</li></ul>							
<b>32-9.6</b> The badge-control system must support generation of an alarm when one persor secure room for more than 30 seconds.	remains alone in the						
<b>Note:</b> Examples of alarm-generation mechanisms include but are not limited to motion of controls, biometrics, badge sensors, etc.	detectors, login/logout						
<b>32-9.6</b> Examine alarm mechanisms and interview alarm-response personnel to verify that the badge-control system supports generation of an alarm when one person remains alone in the secure room for more than 30 seconds.							
<b>32-9.7</b> CCTV cameras must record all activity, including recording events during dark periods through the use of infrared CCTV cameras or automatic activation of floodlights in case of any detected activity. This recording may be motion-activated. The recording must continue for at least a minute after the last pixel of activity subsides.							
<b>32-9.7</b> Inspect CCTV configuration and examine a sample of recordings to verify that CCTV monitoring is in place on a 24/7 basis.	<report findings="" here=""></report>					_	
<b>32-9.8</b> Monitoring must be supported on a continuous (24/7) basis such that alarms can personnel.	be resolved by authorized						



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Sum		Assessn heck on	n <b>ent Find</b> i e)	ings
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
<b>32-9.8</b> Inspect configuration of monitoring systems and interview monitoring personnel to verify that monitoring is supported on a continuous (24/7) basis and alarms can be resolved by authorized personnel.	<report findings="" here=""></report>					
<b>32-9.9</b> The CCTV server and digital storage must be secured in a separate secure locat personnel who have access to the key-injection secure room.	ion that is not accessible to					
<b>32-9.9.a</b> Inspect location of the CCTV server and digital-storage to verify they are located in a secure location that is separate from the key-injection secure room.	<report findings="" here=""></report>					
<b>32-9.9.b</b> Inspect access-control configurations for the CCTV server/storage secure location and the key-injection secure room to identify all personnel who have access to each area. Compare access lists to verify that personnel with access to the key-injection secure room do not have access to the CCTV server/storage secure location.						
<ul> <li>32-9.10 The CCTV cameras must be positioned to monitor:</li> <li>The entrance door,</li> <li>SCDs, both pre and post key injection,</li> <li>Any safes that are present, and</li> <li>The equipment used for key injection.</li> </ul>						
<ul> <li>32-9.10 Inspect CCTV positioning and examine a sample of recordings to verify that CCTV cameras are positioned to monitor:</li> <li>The entrance door,</li> <li>SCDs, both pre and post key injection,</li> <li>Any safes that are present, and</li> <li>The equipment used for key injection.</li> </ul>						
<b>32-9.11</b> CCTV cameras must be positioned so they do not monitor any combination locks, PIN pads, or keyboards used to enter passwords/authentication codes or other authentication credentials.						
<b>32-9.11</b> Inspect CCTV positioning and examine a sample of recordings to verify that CCTV cameras do not monitor any combination locks, PIN pads, or keyboards used to enter passwords/authentication codes or other authentication credentials.						



Annex B, Control Objective 7 PCI PIN Security Requirements	Reporting Details:	Sum		Assessm heck one	nent Findi e)	ngs
and Test Procedures	Assessor's Response	In Place	In Place w/CCW	N/A	Not Tested	Not in Place
32-9.12 Images recorded from the CCTV system must be securely archived for a period	of no less than 45 days.					
If digital-recording mechanisms are used, they must have sufficient storage capacity and loss of information necessary to reconstruct events for the most recent 45-day period.	redundancy to prevent the					
<b>32-9.12.a</b> Examine storage of captured recordings to verify that at least the most recent 45 days of images are securely archived.	<report findings="" here=""></report>					
<b>32-9.12.b</b> If digital-recording mechanisms are used, examine system configurations to verify that the systems have sufficient redundancy to prevent the loss of information necessary to reconstruct events for the most recent 45-day period.	<report findings="" here=""></report>					
<b>Requirement 33:</b> Documented procedures must exist and be demonstrably in use POI devices supporting PIN and HSMs) placed into service, initial				essing ea	quipment (	′e.g.,
<b>33-1</b> Written procedures must exist, and all affected parties must be aware of those proced maintained of the tests and inspections performed by key-injection facilities on PIN-proces are placed into service, as well as devices being decommissioned.						
<b>33-1.a</b> Examine documented procedures/processes and interview responsible personnel to verify that all affected parties are aware of required processes and are provided suitable guidance on procedures for devices placed into service, initialized, deployed, used, and decommissioned,	<report findings="" here=""></report>					
<b>33-1.b</b> Verify that written records exist for the tests and inspections performed on PIN- processing devices before they are placed into service, as well as devices being decommissioned.	<report findings="" here=""></report>					



# **Appendix 1: Compensating Controls**

Compensating controls may be considered for most PCI PIN requirements when an entity cannot meet a requirement explicitly as stated, due to legitimate technical or documented business constraints, but has sufficiently mitigated the risk associated with the requirement through implementation of other, or compensating, controls.

Compensating controls must satisfy the following criteria:

- 1. Meet the intent and rigor of the original PCI PIN requirement.
- 2. Provide a similar level of defense as the original PCI PIN requirement, such that the compensating control sufficiently offsets the risk that the original PCI PIN requirement was designed to defend against.
- 3. Be "above and beyond" other PCI PIN requirements. (Simply being in compliance with other PCI PIN requirements is not a compensating control.)

#### When evaluating "above and beyond" for compensating controls, consider the following:

**Note:** The items at a) and b) below are intended as examples only. All compensating controls must be reviewed and validated for sufficiency by the assessor who conducts the PCI PIN review. The effectiveness of a compensating control is dependent on the specifics of the environment in which the control is implemented, the surrounding security controls, and the configuration of the control. Companies should be aware that a particular compensating control will not be effective in all environments.

Existing PCI PIN requirements CANNOT be considered as compensating controls if they are already required for the item under review. For example, passwords for non-console administrative access must be sent encrypted to mitigate the risk of intercepting clear-text administrative passwords. An entity cannot use other PCI PIN password requirements (intruder lockout, complex passwords, etc.) to compensate for lack of encrypted passwords, since those other password requirements do not mitigate the risk of interception of clear-text passwords. Also, the other password controls are already PCI PIN requirements for the item under review (passwords).

- a) Existing PCI PIN requirements MAY be considered as compensating controls if they are required for another area, but are not required for the item under review.
- b) Be commensurate with the additional risk imposed by not adhering to the PCI PIN requirement.

During each annual PCI PIN assessment, the assessor is required to thoroughly evaluate compensating controls in accordance with items 1–3 above to validate that each adequately addresses the risk for which the original PCI PIN requirement was designed. To maintain compliance, processes and controls must be in place to ensure compensating controls remain effective after the assessment is complete.



# **Appendix 2: Compensating Controls Worksheet**

Use this worksheet to define compensating controls for any requirement where compensating controls are used to meet a PCI PIN requirement. Note that compensating controls should also be documented in the Report on Compliance in the corresponding PCI PIN requirement section.

**Note:** Only companies that have undertaken a risk analysis and have legitimate technological or documented business constraints can consider the use of compensating controls to achieve compliance.

#### **Requirement Number and Definition:**

	Informat	tion Required	Explanation
1.	Constraints	List constraints precluding compliance with the original requirement.	
2.	Objective	Define the objective of the original control; identify the objective met by the compensating control.	
3.	Identified Risk	Identify any additional risk posed by the lack of the original control.	
4.	Definition of Compensating Controls	Define the compensating controls and explain how they address the objectives of the original control and the increased risk, if any.	
5.	Validation of Compensating Controls	Define how the compensating controls were validated and tested.	
6.	Maintenance	Define process and controls in place to maintain compensating controls.	



### **Compensating Controls Worksheet – Completed Example**

Use this worksheet to define compensating controls for any requirement noted as being "in place" via compensating controls.

Requirement Number: 8.1.1 – Are all users identified with a unique user ID before allowing them to access system components or cardholder data?

	Informat	ion Required	Explanation
1.	Constraints	List constraints precluding compliance with the original requirement.	Company XYZ employs stand-alone Unix Servers without LDAP. As such, they each require a "root" login. It is not possible for Company XYZ to manage the "root" login nor is it feasible to log all "root" activity by each user.
2.	Objective	Define the objective of the original control; identify the objective met by the compensating control.	The objective of requiring unique logins is twofold. First, it is not considered acceptable from a security perspective to share login credentials. Secondly, having shared logins makes it impossible to state definitively that a person is responsible for a particular action.
3.	Identified Risk	Identify any additional risk posed by the lack of the original control.	Additional risk is introduced to the access control system by not ensuring all users have a unique ID and are able to be tracked.
4.	Definition of Compensating Controls	Define the compensating controls and explain how they address the objectives of the original control and the increased risk, if any.	Company XYZ is going to require all users to log into the servers using their regular user accounts, and then use the "sudo" command to run any administrative commands. This allows use of the "root" account privileges to run pre-defined commands that are recorded by sudo in the security log. In this way, each user's actions can be traced to an individual user account, without the "root" password being shared with the users.
5.	Validation of Compensating Controls	Define how the compensating controls were validated and tested.	Company XYZ demonstrates to assessor that the sudo command is configured properly using a "sudoers" file, that only pre-defined commands can be run by specified users, and that all activities performed by those individuals using sudo are logged to identify the individual performing actions using "root" privileges.
6.	Maintenance	Define process and controls in place to maintain compensating controls.	Company XYZ documents processes and procedures to ensure sudo configurations are not changed, altered, or removed to allow individual users to execute root commands without being individually identified, tracked and logged.