

# **Is a QSA Employee that designs, develops, or implements specific controls for a customer also permitted to assess those same controls?**

PCI SSC FAQ | Article 1562 | November 2022

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No. As per section 2.2 of the QSA Qualification Requirements, "The QSA Company must have separation of duties controls in place to ensure Assessor-Employees conducting or assisting with PCI SSC Assessments are independent and not subject to any conflict of interest." If a QSA Employee(s) recommends, designs, develops, provides, or implements controls for an entity, it is a conflict of interest for the same QSA Employee(s) to assess that control(s) or the requirement(s) impacted by the control(s).

Another QSA Employee of the same QSA Company (or subcontracted QSA) - not involved in designing, developing, or implementing the controls - may assess the effectiveness of the control(s) and/or the requirement(s) impacted by the control(s). The QSA Company must ensure adequate, documented, and defensible separation of duties is in place within its organization to prevent independence conflicts.

Source: <https://www.pcisecuritystandards.org/faqs/1562/>