acl
transforming audit and risk

DEAN FOODS
AUTOMATES SOX PRIVILEGED ACCESS CONTROL COMPLIANCE WITH ACL TECHNOLOGY

Dean Foods® (NYSE:DF) is the largest U.S. processor and direct-to-store distributor of fluid milk, marketed under more than 50 local and regional dairy brands and private labels. Headquartered in Dallas, Texas, Dean Foods also distributes ice cream, cultured products, juices, teas, bottled water and other products.

> "USING ACL TECHNOLOGY, THE COMPANY IMPROVED EFFICIENCY IN MEETING SARBANES-OXLEY IT USER PROVISIONING CONTROL REQUIREMENTS."
>
> - CHRIS JACKSON, USER PROVISIONING PROCESS OWNER, DEAN FOODS

Challenges: Rapid growth, M&As create IT control opportunities

Every day, Dean Foods delivers fresh milk and other products to customers across the United States, and are the makers of the popular TruMoo flavored milk. The company has grown quickly through acquisitions, and while the rapid growth has been great for business, it brought together many different databases, ERP systems and order-to-cash processes. Access rules varied widely from one system to the next, and the IT department did not have an efficient, effective way to monitor elevated privileged user activities, which year over year always ended with User Provisioning IT General Control (ITGC) challenges .

The need for centralized privileged access controls

Driven to have User Provisioning ITGC's operate effectively, Dean Foods launched a project to implement centralized system privileged access activity monitoring and robust Sarbanes-Oxley (SOX) controls. The IT and User Provisioning leadership team, led by Chris Jackson, first built an Identity and Access Management system and User Provisioning process to improve compliance with the six core User Provisioning ITGCs, and improve quality and effectiveness of the User Provisioning process. "In a nutshell, user provisioning ensures the right people have appropriate systems access, based on their roles at Dean Foods," says Jackson.

Automating manual reviews of all administrator activity was the next step in this journey. The system logs produced huge, multi-page activity journals that required a full day of manual review from each responsible system owner. Once managers completed these painstaking reviews, they would email the results in PDF or spreadsheet form, or mark the task as complete on an internal file server. There were no central policies to guide exceptions, and every reviewer applied different criteria to determine high-risk activities.

Solution: Automated controls with ACL data analytics technology

After creating a reliable identity and access management system, the team was ready to control system authorizations. The Dean Foods Internal Audit (IA) group already used ACL technology and suggested ACL™ Analytics Exchange (AX) for this IT-driven control project.

The IT and User Access teams developed a series of configurable rule sets based on established standards for high-risk system activities. Using AX, they now join these files and activity logs to identify system activities, based on the rule set. The solution works across mid-range, local server, domain and database systems to screen the company's full data population and flag potential problems. AX is also able to

SOLUTION
Enterprise Continuous Monitoring

Consulting Services

Support

INDUSTRY
Food & Beverage

REGION
North America

KEY BENEFITS

50%
cut in technology licensing and reduction in third-party audit costs

20 hours
per week in manual reviews saved

Assist with performance of Sarbanes-Oxley access control requirements

Pass a full-year IT department User Provisioning audit

acl

acl
transforming audit and risk

> "ACL DATA ANALYTICS SOFTWARE HAS BEEN A GREAT HELP AS WE AUTOMATE OUR PROCESSES AND STREAMLINE CRITICAL SYSTEMS."
>
> **– CHRIS JACKSON**
> USER PROVISIONING PROCESS OWNER, DEAN FOODS

Dean's Foods

- More than **50 trusted** regional brands
- More than **70 manufacturing** facilities
- **19,000 employees**
- **3.0 B gallons** produced annually
- Over **37,000 points of distribution**
- More than **2/3 of U.S. households** purchase a Dean Foods branded product annually

Learn more about what your organization can accomplish with ACL.

Call 1-888-669-4225
or email info@acl.com

acl.com | references@acl.com

handle all data sources, ranging from IBM AS400 to MS Active Directory, MS Windows local servers and application/database systems.

The exception criteria (aka decision point) was centralized within a Risk Management team function so the same exception criteria could apply across the whole environment without deviation from personal choices made by management in reviewing their own teams. The criteria and rule sets are reviewed on an as-needed basis and at least semi-annually to confirm they are up-to-date.

Closing the loop on control exceptions

Dean Foods uses the exception management capabilities of AX to close its remediation loop. When the analytics detect a problem, the system automatically notifies the appropriate manager, who can click a link to visit the internal AX exception management web portal, examine the issue, and submit a review. Managers (or other process owners) can also see workflow histories, add comments and upload attachments – and by ruling whether each activity is acceptable or inappropriate, the review process actually refines the access rules and continually cleans the data. The Risk Management team performs the final review to ensure complete and accurate reviews.

Within six weeks, Dean Foods designed its own monitoring process and worked with ACL Consulting Services to create custom analytics and automate the data imports. The company also relies on ACL Support Services to resolve technical problems. From logic bugs to web service issues, the team can access skilled help with a single phone call.

Results: Reaching a major corporate milestone

Dean Foods has used ACL technology to:

- Assure controls operate effectively and efficiently to mitigate risk.
- Improve the quality and efficiency of User Provisioning IT General Control (ITGC) testing.
- Cut technology licensing and third-party audit costs.
- Access and analyze data from any data source, which enables monitoring of user privileged access activity across every company system and technology.

Almost immediately, the automated controls eliminated about 20 hours (five managers saving four

hours each) of manual reviews per week, as reviewers can focus on identified exceptions rather than all activity. The ACL solution also connects different business systems and databases to provide complete data coverage.

Most importantly, the new activity controls recently helped Dean Foods pass its annual IT User Provisioning audit.

Reducing manual effort to reduce costs

Automated controls will also enable Dean Foods to eliminate several monitoring tools (and the associated licensing costs), increase review quality and reduce audit fees by half. "The new, robust rule set serves as a cornerstone of the SOX control and user provisioning process," says Jackson. "The Dean Foods IT group now works closely with IA to minimize risk and improve processes." Working toward shared goals increases the sense of partnership between the two functions as they work to continually improve solutions and systems.

The Dean Foods journey began with a need to standardize system access and led to stronger, more robust internal controls.

Dean Foods: IT + IA collaboration tips

- Look for new ways for IA and IT to collaborate.
- IT can help Audit leverage new tools and systems to lower and mitigate risk.
- Identify key projects and priorities that drive a shared sense of purpose.
- Invite an IT manager to be a guest auditor, or an IA manager to work closely with IT.
- Learning each others' working methods and priorities can build partnership and trust.