



THE UNIVERSITY OF TEXAS AT DALLAS

OFFICE OF AUDIT AND CONSULTING SERVICES  
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**Date:** September 5, 2024

**To:** Ms. Ijeoma Nkele, Director of Purchasing

**From:** Ms. Toni Stephens, Chief Audit Executive

DocuSigned by:  
*Toni Stephens*  
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**Subject:** Purchasing and Contracting Policies Compliance Assessment

The Texas Education Code (TEC) §51.9337 requires that, *“The chief auditor of an institution of higher education shall annually assess whether the institution has adopted the rules and policies required by this section and shall submit a report of findings to the state auditor.”*

To satisfy this requirement, we performed the following as part of our FY24 annual audit plan:

- Gained an understanding of the requirements contained in TEC §51.9337,
- Reviewed documentation, including policies and procedures, supporting compliance with TEC §51.9337. Policies and procedures reviewed included those relating to codes of ethics and conduct; conflicts of interest and outside commitment; fraud policies; and contract management, delegation, and training. Our procedures did not include testing of compliance with the policies and procedures.

One issue was noted during our assessment. TEC §51.9337 requires the institution’s code of ethics to include general standards of conduct. While the UT Dallas [Code of Ethics](#) does include reference to these standards of conduct related to conflicts of interest, it also references the University’s Standards of Conduct Guide for a full discussion of various ethical issues. We noted in the past five reports that the guide was in the process of updating and no longer on the University’s website. The Standards of Conduct Guide is still not issued; however, this was addressed in Audit Report No. R2411, *TEC 51.3525 Compliance Audit*, dated August 19, 2024. This new Standards of Conduct Guide is scheduled to be implemented by September 1, 2024.

Overall, UT Dallas has adopted the policies and procedures outlined in TEC §51.9337. This certification will be included in the Annual Internal Audit Report to the State Auditor’s Office as required under Texas Government Code §2102.

Thank you for your assistance in providing the information necessary for this assessment. Please let me know if you have any questions or comments.

cc: Mr. Terry Pankratz, Vice President for Budget and Finance  
Dr. Brian Bernoussi, Assistant Vice President for Operations  
Mr. Bryce Brownlee, Director of Contract Administration  
UT System Audit Office

*Staff Assigned*

Staff Auditor: Brian Seale, Auditor II