

# INDEPENDENT SCHOOL DISTRICT #877 POLICY

## Buffalo-Hanover-Montrose

INDEX TITLE Non-Instructional Operations and Business Services SERIES NO. 700

POLICY TITLE Investments ~~and Cash Management~~ CODE NO. 705

### I. PURPOSE

The purpose of this policy is to establish guidelines for the investment of school district funds.

### II. GENERAL STATEMENT OF POLICY

The policy of the school district is to comply with all state laws relating to investments and to guarantee that investments meet certain primary criteria.

### III. SCOPE

This procedure applies to activities of the school district with regard to investing of the financial assets of all funds including the following: General Fund, Special Revenue (Food Service, Community Services), Capital Expenditure, Building Construction, Alternative Facilities, Debt Service, Trust and Agencies, and Student Activity Funds.

### IV. AUTHORITY; OBJECTIVES

- A. The funds of the school district shall be deposited or invested in accordance with this policy, **Minnesota Statutes Chapter** 118A and any other applicable law or written administrative procedures.
- B. The primary criteria for the investment of the funds of the school district, in priority order, are as follows
  1. Safety and Security. Safety of principal is the first priority. The investments of the school district shall be undertaken in a manner that seeks to ensure the preservation of the capital in the overall investment portfolio.
  2. Liquidity. The funds shall be invested to assure that funds are available to meet immediate payment requirements, including payroll, accounts payable, and debt service.
  3. Return and Yield. The investments shall be managed in a manner to attain a market rate of return through various economic and budgetary cycles, while preserving and protecting the capital in the investment portfolio and considering constraints on risk and cash flow requirements.

## **V. DELEGATION OF AUTHORITY**

- A. The Director of Finance and Operations, or designee, is designated as investment officer of the school district and is responsible for investment decisions and activities under the direction of the school board. The investment officer shall operate the school district's investment program consistent with this policy. The investment officer may delegate certain duties to a designee or designees, but shall remain responsible for the operation of the program.
- B. All officials and employees that are part of the investment process shall act professionally and responsibly as custodians of the public trust, and shall refrain from personal business activity that could conflict with the investment program or which could reasonably cause others to question the process and integrity of the investment program. The investment officer shall avoid any transaction that could impair public confidence in the school district.

## **VI. STANDARD OF CONDUCT**

The standard of conduct regarding school district investments to be applied by the investment officer shall be the "prudent person standard." Under this standard, the investment officer shall exercise that degree of judgment and care, under the circumstances then prevailing, that persons of prudence, discretion, and intelligence would exercise in the management of their own affairs, investing not for speculation and considering the probable safety of their capital as well as the probable investment return to be derived from their assets. The prudent person standard shall be applied in the context of managing the overall investment portfolio of the school district. The investment officer, acting in accordance with this policy and exercising due diligence, judgment, and care commensurate with the risk, shall not be held personally responsible for a specific security's performance or for market price changes. Deviations from expectations shall be reported in a timely manner and appropriate actions shall be taken to control adverse developments.

## **VII. MONITORING AND ADJUSTING THE PORTFOLIO**

The investment officer will monitor the contents of the portfolio, the available market, and the relative values of the competing instruments. The procedures shall be designated to prevent loss of public funds due to fraud, error, misrepresentation, unanticipated market changes and imprudent actions.

## **VIII. INTERNAL CONTROLS**

The investment officer shall establish a system of internal controls which shall be documented in writing. The internal controls shall be reviewed by the school board and shall be annually reviewed for compliance by the school district's independent auditors. The internal controls shall be designed to prevent and control losses of public funds due to fraud, error, misrepresentation, unanticipated market changes, or imprudent actions by officers, employees, or others. The internal controls may include, but shall not be limited to, provisions relating to controlling collusion, separating functions, separating transaction authority from accounting and record keeping, custodial safekeeping, avoiding bearer form

securities, clearly delegating authority to applicable staff members, limiting securities losses and remedial action, confirming telephone transactions in writing, supervising and controlling employee actions, minimizing the number of authorized investment officials, and documenting transactions and strategies.

**IX. PERMISSABLE INVESTMENT INSTRUMENTS**

The school district may invest its available funds in those instruments specified in **Minnesota Statutes sections §§ 118A.04 and 118A.05**, as these sections may be amended from time to time, or any other law governing the investment of school district funds. The assets of an Other Post Employment Benefits (OPEB) trust or trust account established pursuant to **Minnesota Statutes sections §§ 471.6175** to pay postemployment benefits to employees or officers after their termination of service, with a trust administrator other than the Public Employees Retirement Association, may be invested in instruments authorized under **Minnesota Statutes Chapter 118A** or **Minnesota Statutes section §§ 356.A.06, subdivision. 7**. See District Policy 705.1 Investments Policy – OPEB. Investment of funds in an OPEB trust account under **Minnesota Statutes section § 356A.06, subdivision 7**, as well as the overall asset allocation strategy for OPEB investments, shall be governed by an OPEB Investment Policy Statement (IPS) developed between the investment officer, as designed herein, and the trust administrator.

**X. PORTFOLIO DIVERSIFICATION; MATURITIES**

The school district will diversify use of investment instruments to avoid incurring unreasonable risks inherent in over investing in specific instruments, individual financial institutions or maturities.

	Maximum Percent  <u>of Portfolio</u>
Investment Type:	
U.S. Treasury Obligations (bills, notes and bonds)	100%
U.S. Government Agency Securities and Instrumentalities of Government Sponsored Corporations	100%
Local Government Investment Pool	100%
Certificates of Deposit (CDs)	95%
Commercial Paper - Prime (C)	33%
Repurchase Agreements (Repos)	33%

No more than 50% of the total portfolio will be with any one single investment issued from among the investment types listed above.

**Maturity Scheduling:**

Investment maturities shall be scheduled to coincide with projected cash flow needs, taking into account large routine expenditures (payroll, bond payments) as well as considering sizeable blocks of anticipated revenue (property tax and state aid payments).

## **XI. COMPETITIVE SELECTION OF INVESTMENT INSTRUMENTS**

Before the school district invests any surplus funds in a specific investment instrument, a competitive bid or quotation process shall be utilized. If a specific maturity date is required, either for cash flow purposes or for conformance to maturity guidelines, quotations or bids shall be requested for instruments which meet the maturity requirement. If no specific maturity is required, a market trend analysis, which includes a yield curve, will normally be used to determine which maturities would be most advantageous. Quotations or bids shall be requested for various options with regard to term and instrument. The school district will accept the quotation or bid which provides the highest rate of return within the maturity required and within the limits of this policy. Generally, all quotations or bids will be computed on a consistent basis, i.e., a 360-day or a 365-day yield. Records will be kept of the quotations or bids received, the quotations or bids accepted, and a brief explanation of the decision that was made regarding the investment. If the school district contracts with an investment advisor, bids are not required in those circumstances specified in the contract with the advisor.

## **XII. QUALIFIED INSTITUTIONS AND BROKER-DEALERS**

- A. The school district shall maintain a list of financial institutions, which are approved for investment purposes. Financial institutions include, but are not limited to, federally chartered banks, and other money management firms. Such institutions or firms must be designated by the Board of Education as official depositories. They shall have done business with other Minnesota government units and be primary dealers or a Minnesota regional dealer with combined capital and surplus of at least forty million dollars exclusive of subordinate debt.
- B. Prior to completing an initial transaction with a broker, the school district shall provide to the broker a written statement of investment restrictions which shall include a provision that all future investments are to be made in accordance with Minnesota statutes governing the investment of public funds. The broker must annually acknowledge receipt of the statement of investment restrictions and agree to handle the school district's account in accordance with these restrictions. The school district may not enter into a transaction with a broker until the broker has provided this annual written agreement to the school district. The notification form to be used shall be that prepared by the State Auditor. A copy of this investment policy, including any amendments thereto, shall be provided to each such broker.

## **XIII. SAFEKEEPING AND COLLATERALIZATION**

- A. All investment securities purchased by the school district shall be held in third-party safekeeping by an institution designated as custodial agent. The custodial agent may be any Federal Reserve Bank, any bank authorized under the laws of the United States or any state to exercise corporate trust powers, a primary reporting dealer in United States Government securities to the Federal Reserve Bank of New York, or a securities broker-dealer defined in **Minnesota Statutes section §118A.06**. The institution or dealer shall issue a safekeeping receipt to the school district

listing the specific instrument, the name of the issuer, the name in which the security is held, the rate, the maturity, serial numbers and other distinguishing marks, and other pertinent information.

- B. Deposit-type securities shall be collateralized as required by **Minnesota Statutes section § 118A.03** for any amount exceeding FDIC, SAIF, BIF, FCUA, or other federal deposit coverage.
- C. Repurchase agreements shall be secured by the physical delivery or transfer against payment of the collateral securities to a third party or custodial agent for safekeeping. The school district may accept a safekeeping receipt instead of requiring physical delivery or third-party safekeeping of collateral on overnight repurchase agreements of less than \$1,000,000.

#### **XIV. REPORTING REQUIREMENTS**

- A. The investment officer shall generate daily and monthly transaction reports for management purposes. In addition, the school board shall be provided a quarterly report that shall include data on investment instruments being held as well as any narrative necessary for clarification.
- B. The investment officer shall prepare and submit to the school board a quarterly investment report that summarizes recent market conditions, economic developments, and anticipated investment conditions. The report shall summarize the investment strategies employed in the most recent quarter and describe the investment portfolio in terms of investment securities, maturities, risk characteristics, and other features. The report shall summarize changes in investment instruments and asset allocation strategy approved by the investment officer for an OPEB trust in the most recent quarter. The report shall explain the quarter's total investment return and compare the return with budgetary expectations. The report shall include an appendix that discloses all transactions during the past quarter. Each quarterly report shall indicate any areas of policy concern and suggested or planned revisions of investment strategies. Copies of the report shall be provided to the school district's auditor.
- C. Within ninety (90) days after the end of each fiscal year of the school district, the investment officer shall prepare and submit to the school board a comprehensive annual report on the investment program and investment activity of the school district for that fiscal year. The annual report shall include 12-month and separate quarterly comparisons of return and shall suggest revisions and improvements that might be made in the investment program.
- D. If necessary, the investment officer shall establish systems and procedures to comply with applicable federal laws and regulations governing the investment of bond proceeds and funds in a debt service account for a bond issue. The record keeping system shall be reviewed annually by the independent auditor or by another party contracted or designated to review investments for arbitrage rebate or penalty calculation purposes.

#### XIV. DEPOSITORIES

The school board shall designate one or more official depositories for school district funds. The treasurer or the chief financial officer of the school district may also exercise the power of the school board to designate a depository. The school board shall be provided notice of any such designation by its next regular meeting. The school district and the depository shall each comply with the provisions of **Minnesota Statutes section 118A.03**. The official depositories of the school district include Old National Bank, BankWest, CorTrust Bank, MidCountry Bank, Minnesota School District Liquid Asset Fund, PMA Financial Network, Inc., Bremer Bank and First Community Bank of Lester Prairie and Silver Lake.

#### XV. ELECTRONIC FUND TRANSFERS

The school district may make electronic fund transfers for investments of excess funds upon compliance with **Minnesota Statutes section 471.38**.

#### *Legal References:*

- Minn. Stat. § 118A.01 (~~Public Funds; Depositories and Investments~~) (**Definitions**)
- Minn. Stat. § 118A.02 (~~Authorization for Deposit and Investment~~) (**Depositories; Investing; Sales, Proceeds, Immunity**)
- Minn. Stat. § 118A.03 (~~Depositories and Collateral~~) (**When and What Collateral Required**)
- Minn. Stat. § 118A.04 (Investments)
- Minn. Stat. § 118A.05 (Contracts and Agreements)
- Minn. Stat. § 118A.06 (~~Delivery and~~ Safekeeping; **Acknowledgements**)
- Minn. Stat. § 356A.06, Subd. 7 (~~Authorized Investment Securities~~) (**Investments; Additional Duties**)
- Minn. Stat. § 471.38 (Claims)
- Minn. Stat. § 471.6175 (Trust for Postemployment Benefits)

**Cross References:** MSBA/MASA Model Policy 703 (Annual Audit)  
~~MSBA Service Manual, Chapter 7, Education Funding~~  
Minnesota Legal Compliance Audit Guide **for School Districts** Prepared by the Office of the State Auditor

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