

**Investment Authority**

The Superintendent and business clerk shall serve as the investment officers of the District and shall invest District funds as directed by the Board and in accordance with the District's written investment policy and generally accepted accounting procedures.

**Approved  
Investment  
Instruments**

From those investments authorized by law and described further in CDA(LEGAL) under Authorized Investments, the Board shall permit investment of District funds, including bond proceeds and pledged revenue to the extent allowed by law, in only the following investment types, consistent with the strategies and maturities defined in this policy:

1. Obligations of, or guaranteed by, governmental entities as permitted by Government Code 2256.009.
2. Certificates of deposit and share certificates, and other forms of financial institution deposits, as permitted by Government Code 2256.009(a) and 2256.010 that are properly insured or collateralized.
3. Fully collateralized repurchase agreements permitted by Government Code 2256.011.
4. No-load mutual funds, except for bond proceeds, and no-load money market mutual funds whose investment objectives include a stable \$1.0000 net asset value as permitted by Government Code 2256.014.
5. A guaranteed investment contract as an investment vehicle for bond proceeds, provided it meets the criteria and eligibility requirements established by Government Code 2256.015.
6. Public funds investment pools as permitted by Government Code 2256.016.

The District shall not be required to liquidate investments that were authorized investments at the time of purchase.

**Safety**

The primary goal of the investment program is to ensure safety of principal, maintain liquidity, and optimize financial returns within current market conditions in accordance with this policy. Investments shall be made with judgement and care, under prevailing circumstances, that a person of prudence, discretion, and intelligence would exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of capital and the probable income to be derived.

The investment officers shall seek to act responsibly as custodians of the public trust. The investment officers shall avoid transactions

that might impair public confidence in the District's ability to govern effectively.

Investments shall be made in a manner that ensures the preservation of capital in the overall portfolio.

**Investment  
Management**

In accordance with Government Code 2256.005(b)(3), the quality and capability of investment management for District funds shall be in accordance with the standard of care, investment training, and other requirements set forth in Government Code Chapter 2256.

Each investment officer shall attend investment training sessions from the following authorized independent sources:

- Texas Association of School Boards ("TASB")
- Texas Association of School Administrators ("TASA")
- Texas Association of School Business Officials ("TASBO")
- Regional Education Service Center
- American Institute of Certified Public Accountants ("AICPA")
- Texas Society of Certified Public Accountants ("TSCPA")
- University of North Texas Center for Public Management
- Council of Governments
- Government Treasurer's Organization of Texas ("GTOT")
- Public Treasury Institute of North America
- Texas Cooperative Liquid Assets Security System (Texas CLASS) Trust

**Liquidity and  
Maturity**

The maximum dollar weighted maturity and stated final maturity of District investments is outlined in Funds/Strategies.

The District's investment portfolio shall have sufficient liquidity to meet anticipated cash flow requirements.

**Diversity**

The investment portfolio shall be diversified in terms of investment instruments, maturity scheduling, and financial institutions to reduce risk of loss resulting from overconcentration of assets in a specific class of investments, specific maturity, or specific issuer, where appropriate.

**Monitoring Market  
Prices**

The investment officers shall monitor the investment portfolio and shall keep the Board informed of significant changes in the market value of the District's investment portfolio. Information sources may include financial/investment publications and electronic media,

available software for tracking investments, depository banks, commercial or investment banks, financial advisers, and representatives/advisers of investment pools or money market funds. Monitoring shall be done at least quarterly, as required by law, and more often as economic conditions warrant by using appropriate reports, indices, or benchmarks for the type of investment.

**Monitoring Rating Changes**

In accordance with Government Code 2256.005(b), the investment officers shall develop a procedure to monitor changes in investment ratings and shall take all prudent measures that are consistent with this policy to liquidate investments that do not maintain satisfactory ratings.

**Portfolio Reporting**

The investment officers shall prepare an investment report at least quarterly in compliance with the Public Funds Investment Act (PFIA). This report shall be prepared in a manner that will allow the District to ascertain whether investment activities during the reporting period have conformed to this policy. The report shall be provided to the Board. Weighted average yield to maturity shall be the portfolio performance standard presented in the report.

**Funds/Strategies**

Investments of the following fund categories shall be consistent with this policy and in accordance with the applicable strategy defined below. All strategies described below for the investment of a particular fund should be based on an understanding of the suitability of an investment to the financial requirements of the District and consider preservation and safety of principal, liquidity, marketability of an investment if the need arises to liquidate before maturity, diversification of the investment portfolio, and yield.

**Operating Funds**

Investment strategies for operating funds (including any commingled pools containing operating funds) shall have as their primary objectives preservation and safety of principal, investment liquidity, and maturity sufficient to meet anticipated cash flow requirements. Any approved investment instrument is suitable and provides acceptable marketability. The maximum dollar weighted maturity shall be 270 days and the maximum stated final maturity shall be two years. The appropriate yield target shall be the District's main public funds investment pool yield.

**Custodial Funds**

Investment strategies for custodial funds shall have as their primary objectives preservation and safety of principal, investment liquidity, and maturity sufficient to meet anticipated cash flow requirements. Any approved investment instrument is suitable and provides acceptable marketability. The maximum stated final maturity shall be two years. The appropriate yield target shall be the District's main public funds investment pool yield.

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**Debt Service Funds** Investment strategies for debt service funds shall have as their primary objective sufficient investment liquidity to timely meet debt service payment obligations in accordance with provisions in the bond documents. Any approved investment instrument is suitable and provides acceptable marketability. The maximum stated final maturity shall be the next debt service payment date not already funded by pending approved investment instruments. The appropriate yield target shall be the District's main public funds investment pool yield.

**Capital Project Funds** Investment strategies for capital project funds shall have as their primary objective sufficient investment liquidity to timely meet capital project obligations. Any approved investment instrument is suitable and provides acceptable marketability. The maximum stated final maturity shall be the lesser of the anticipated cash flow schedule and the applicable "temporary period" allowed by the IRS. Achieving a positive spread to the cost of borrowing is the desired objective, within the limits of this policy's risk constraints. The default yield target shall be the District's main public funds investment pool yield.

**Safekeeping and Custody**

All investment security and repurchase agreement transactions shall be settled on a delivery versus payment basis. The District shall retain clearly marked safekeeping receipts providing proof of the District's ownership of directly purchased investments. The District may delegate, however, to an investment pool the authority to hold legal title as custodian of investments purchased with District funds by the investment pool.

All securities pledged as collateral backing District deposits shall be held by an approved custodian, and the District shall retain clearly marked pledge receipts.

**Collateral**

The District shall comply with state law in the monitoring and management of pledged collateral. All instruments authorized in the Public Funds Collateral Act are eligible for pledge. Additionally, the District shall require a perfected security interest in compliance with federal and state regulations, including:

1. The agreement must be in writing;
2. The agreement must be executed by the depository and the District contemporaneously with the acquisition of the asset;
3. The agreement must be approved by the Board or designated committee of the depository and a copy of the meeting minutes must be delivered to the District; and
4. The agreement must be part of the depository's "official record" continuously since its execution.

**Sellers of  
Investments**

Prior to handling investments on behalf of the District, a broker/dealer or a qualified representative of a business organization must submit required written documents in accordance with law. [See Sellers of Investments, CDA(LEGAL)]

Representatives of brokers/dealers and representatives with distributors of investment pools shall be registered with the Texas State Securities Board and must have membership in the Securities Investor Protection Corporation (SIPC) and be in good standing with the Financial Industry Regulatory Authority (FINRA). Distributors of investment pools shall also be a registrant in good standing with the Municipal Securities Rulemaking Board (MSRB). Broker/dealer firms and representative with distributors of investment pools shall be approved by the Board initially, and annually thereafter, and shall meet selection criteria as determined by the investment officers.

Authorized broker/dealers and representatives with distributors of investment pools include:

- FHN Financial
- SAMCO Capital Markets
- Wells Fargo Securities

**Business  
Organizations**

Prior to handling investments on behalf of the District, business organizations must submit written documents in accordance with law.

**Competitive  
Environment**

In order to get the best return on its investments, the District may solicit quotes from multiple providers for each investment transaction, including certificates of deposit.

**Soliciting Bids for  
CDs**

In order to get the best return on its investments, the District may solicit bids for certificates of deposit in writing, by telephone, or electronically, or by a combination of these methods.

**Interest Rate Risk**

To reduce exposure to changes in interest rates that could adversely affect the value of investments, the District shall use final and weighted-average-maturity limits and diversification.

**Internal Controls**

A system of internal controls shall be established and documented in writing and must include specific procedures designating who has authority to withdraw funds. Also, they shall be designed to protect against losses of public funds arising from fraud, employee error, misrepresentation by third parties, unanticipated changes in financial markets, or imprudent actions by employees and officers of the District. Controls deemed most important shall include:

1. Separation of transaction authority from accounting and recordkeeping and electronic transfer of funds.

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2. Avoidance of collusion.
3. Custodial safekeeping.
4. Clear delegation of authority.
5. Written confirmation of telephone transactions.
6. Documentation of dealer questionnaires, quotations and bids, evaluations, transactions, and rationale.
7. Avoidance of bearer-form securities.

**Annual Review**

The Board shall review this investment policy and investment strategies not less than annually and shall document its review in writing, which shall include whether any changes were made to either the investment policy or investment strategies.

**Annual Audit**

In conjunction with the annual financial audit, the District shall perform a compliance audit of management controls on investments and adherence to the District's established investment policies.