C.1.7 (Policy) Investments
Responsible Department: Vice Chancellor for Finance and Administration
Board Adoption: 9-15-2009
Amended: 10-26-10, 10-25-11, 10-30-12, 10-22-13, 10-28-14, 10-27-15, 10-18-16, 10-23-17, 10-16-18, 10-22-19, 10-20-20, 10-27-21
Reviewed: 10-18-22, 10-24-23

ALAMO COLLEGES DISTRICT

General

The Board of Trustees ("Board") as fiduciary of the funds of Alamo Community College District, may direct or delegate the purchase, sale, and investment of funds under its control in investments authorized in the Public Funds Investment Act, Chapter 2256, Texas Government Code ("PFIA"), in compliance with Board-adopted investment policies, and according to the standard of care prescribed in this written policy. This Policy is intended to satisfy the requirements of the PFIA. *[Texas Government Code Section 2256.005(a)]*

Scope

The provisions of this policy apply to the investment of College District funds and to all funds under the control of the Board, including, without limitation:

(i) Operating Funds
(ii) Debt Service Funds
(iii) Debt Service Reserve Fund
(iv) Construction Funds and Unexpended Plant Funds
(v) Other Funds

Objectives

This investment policy emphasizes the safety of principal and liquidity, *[Texas Government Code Section 2256.005 (2)]* and addresses investment diversification, yield, maturity and the quality and capability of investment management. The Board intends that investments will be purchased to hold until maturity; no investments will be made for the specific purpose of speculation of changes in market interest rates.

The investment objectives of the College District are in order of priority:

1. Assure the safety of the College District's funds.
2. Maintain sufficient liquidity to provide adequate and timely operating funds.
3. Ensure the investment is marketable if the need arises to liquidate the investment.

4. Minimize risk of loss resulting from concentration of assets by diversifying investments as to maturity, security type, and issuer and providing for investments in authorized pooled and mutual funds.
5. Attain a market yield consistent with safety and liquidity considerations.

Management of Funds

Delegation of Authority

The Board retains ultimate responsibility as fiduciaries of the assets of the College District. The Associate Vice Chancellor of Finance and Fiscal Services is designated as the investment officer of the College District by Board authority delegated through the Chancellor. In the absence of the Associate Vice Chancellor of Finance and Fiscal Services, the Vice Chancellor for Finance and Administration is deemed to be the investment officer. The investment officer shall be responsible for the investment of funds consistent with the investment policy adopted by the Board. The Associate Vice Chancellor of Finance and Fiscal Services may delegate management responsibility for daily investment transactions to the Controller or Treasurer.
[Texas Government Code Section 2256.005(f)]

External Advisory Services

The Board may contract with advisory firm registered under the Investment Advisors Act of 1940 (15 U.S.C. Section 80-b1 et seq.) and the State of Texas to provide for the nondiscretionary investment and management of its public funds under its control. The contracted period will be for a maximum of two years, and a renewal or extension of the contract must be made by the Board by resolution. The firm must disclose any significant litigation relating to the firm's integrity or abilities. Subject to the provisions of the professional services contract, advisory firms can be terminated by the Board at any time.
[Texas Government Code Section 2256.003(b)]

Standards of Care

Standards of Care

All investments will be made with judgment and care, under prevailing circumstances, that a person of prudence, discretion, and intelligence would exercise in the management of his/her own affairs, not for speculation. *[Texas Government Code Section 2256.006(a)]* In determining whether an investment officer has exercised prudence with respect to an investment decision, the

determination will be made taking into consideration: (1) the investment of all funds over which the officer had responsibility, rather than a consideration as to the prudence of a single investment; and (2) whether the investment decision was consistent with this investment policy. *[Texas Government Code Section 2256.006 (b)]* A College District investment officer who has a personal business relationship with a business organization offering to engage in an investment transaction with the College District will file a statement disclosing that personal business interest. An investment officer who is related as determined by Texas Government Code Chapter 573, to an individual seeking to sell an investment to the College District will file a statement disclosing that relationship with the Board and with the Texas Ethics Commission. *[Texas Government Code Section 2256.005]*

Training

Board members and investment officers will attend at least one training session relating to the person's responsibilities conducted by the Texas Higher Education Coordinating Board within six months after taking office or assuming duties. Training shall include education in investment controls, security risks, strategy risks, market risks, diversification of investment portfolio and compliance with the Public Funds Investment Act. All investment officers will attend a minimum of five hours of training at least once every state biennium from a recognized and independent source, as approved by the Board of Trustees. The list of approved training sources is listed in **Appendix 1**. *[Texas Government Code Section 2256.007]*

Internal Controls

Internal controls will be established by the investment officer to prevent the loss of public funds through collusion. There will be a division of responsibilities between the Associate Vice Chancellor of Finance and Fiscal Services, the Controller and the Treasurer for internal control purposes. The internal control procedures will address the following points:

(i) Avoidance of collusion
(ii) Separation of trading authority from personnel responsible for maintaining the accounting records
(iii) Custodial safekeeping
(iv) Written confirmation of transactions

Roles and responsibilities of the participants in the investment process of the College District are outlined in **Appendix 2**.

The investment officer will establish a process for a compliance audit at least once every two years by the College District's internal auditor or by a private auditor, the results of which are reported to the state auditor no later than January of each even-numbered year.
[Texas Government Code Section 2256.005 (n)]

Quarterly reports will be reviewed at least annually by an independent auditor reporting to the Board of Trustees. This will be done as part of the annual external audit process.
[Texas Government Code Section 2256.023 (d)]

Investment Strategies

The Board will adopt a separate written investment strategy for each type of account under its control, describing the investment objectives of each.
[Texas Government Code Section 2256.005(d)]
Operating Funds

The objective of these funds is to maintain adequate liquidity to meet cash needs. All security types listed in the "*Authorized Investments-Operating Funds*" section of this policy are considered suitable investments for the investment of Operating funds. Safety of principal and availability of adequate liquidity take priority over yield. The College District will diversify assets by security type, issuer and maturity date through separately purchased investments, through investments in approved pools or a combination of both in order to minimize overall risk and capture additional yield through maturity extension, as determined by cash flow needs.

The investment strategy for the District's Operating funds shall be accomplished by purchasing high quality, short- to medium-term securities. It is expected that a portion of the portfolio will be invested in readily available, liquid funds such as Local Government Investment Pools, money market funds or overnight repurchase agreements. The dollar weighted average maturity for operating funds shall be two years or less. (Investment in the liquidity alternative is assumed to have maturity of one day for calculation purposes). Callable securities may be purchased in this fund group when there is a yield advantage over non-callable treasury securities of comparable duration based on both the call date and the stated final maturity date. The stated final maturity for an individual security can be up to five years from the date of purchase. It is anticipated that the portfolio will have an overall yield higher than the liquidity product utilized; this liquidity alternative will be used as a benchmark for performance.

Debt Service Funds

Investments in debt service funds are governed by the bond covenants, and investment strategies for debt service funds shall assure investment liquidity adequate to cover the debt service obligation on the required payment date. Securities are purchased to meet specific bond payment dates. All security types as authorized for Operating funds within this policy are considered suitable investments for the investment of Debt Service funds. Safety of principal shall take priority over yield. Adequate liquidity is required only to fund each debt service payment. The

College District will seek diversification by security type, and issuer in order to minimize overall risk. Securities purchased shall not have a stated final maturity date which exceeds the debt service payment date. The weighted average maturity of the Debt Service Fund will be commensurate with bond covenants.

Debt Service Reserve Funds

Investment of debt reserve funds is governed by the bond covenants. Generally, all security types authorized for Operating funds within this policy are considered suitable investments for the investment of Debt Service Reserve funds. Safety of principal shall take priority over yield. There is no need to maintain cash liquidity in a Reserve fund. The College District shall seek diversification by security type and issuer name in order to minimize overall risk.

Investment strategies for debt service reserve funds shall generate a dependable revenue stream to the appropriate debt service fund from securities with a low degree of volatility. Except as may be required by the bond minute order specific to an individual issue, securities should be of high quality, with short- to intermediate-term maturities. Stated final maturity of any individual security in the debt service reserve fund shall not exceed the final installment payment date of the debt issue. The weighted average maturity of the Debt Service Reserve Funds will be commensurate with bond covenants.

Construction Funds and Unexpended Plant Funds

Investment strategies for construction funds and unexpended plant funds must assure that anticipated cash flows are matched with adequate investment liquidity. All security types authorized for Operating funds within this policy are considered suitable investments for the investment of Construction Funds and Unexpended Plant Funds, but if the funds are proceeds from bond issuances, the covenants from the issue govern the investment activity. Safety of principal shall take priority over yield. Care shall be taken to provide adequate liquidity to fund forecasted expenditures. The College District will seek diversification by security type and issuer when purchasing individual securities, but may invest all of the proceeds of a single bond issue into a single investment if that investment type allows for cash withdrawals on demand. These portfolios should include an adequate level of investment in highly liquid securities or investment in public funds investment pools which function as a money market mutual fund to allow for flexibility to meet unanticipated project outlays. The stated final maturity dates of securities held should not exceed the estimated project completion date. The weighted average maturity of these funds will be commensurate with the timing of the construction project.

Other Funds

From time to time, funds are received that are identified for specific use. The investment objective of these funds is to maintain adequate liquidity to meet cash needs. All security types listed in the "*Authorized Investments-Operating Funds*" section of this policy are considered suitable

investments for the investment of Operating funds. Safety of principal and availability of adequate liquidity take priority over yield.

Authorized Investments

Operating Funds

Only the following securities are authorized investments under this policy. All investments are referenced and authorized under the *Texas Government Code (PFIA) Sections 2256.009- 2256.016 and Sections 2256-019 – 2256.0201*

(i) Obligations of the United States, including letters of credit, or its agencies and instrumentalities;

(ii) Direct obligations of the State of Texas or its agencies and instrumentalities;

(iii) Other obligations, the principal and interest of which are unconditionally guaranteed or insured by, or backed by the full faith and credit of, the State of Texas or the United States or their respective agencies and instrumentalities including any security type insured by the Federal Deposit Insurance Corporation (FDIC);

(iv) Obligations of states, agencies, counties, cities, and other political subdivisions of any state rated as to investment quality by a nationally recognized investment rating firm not less than A or its equivalent;

(v) Certificates of Deposit and Share Certificates issued by a depository institution that has its main office or a branch office in Texas or through a broker that has its main office or a branch office in Texas and is included on the authorized broker list. These may be purchased without limit from a domestic bank if the principal and accrued interest is insured by the FDIC, is fully secured by an FHLB Letter of Credit, or collateralized by securities as provided for in this policy (see "Collateralization"). t. Certificates of Deposit (CDs) may be placed with banking institutions which offer competitive and documented interest rates, both at or above interest rates available on government securities to similar maturity dates. Since it may not possible to obtain competitive CD offers, documentation detailing the best available alternatives at time of purchase is required;

(vi) Collateralized Repurchase Agreements. Execution of a Master Repurchase Agreement, approved by the Legal Department, is required prior to the purchase of this investment. Investments must have a defined termination date and be secured by a combination of cash and obligations as described by Section 2256.009(a) (1) of the Texas Government Code. The securities being purchased to be pledged to the College District, held in the College District's name and deposited at the time the investment is made; and, is placed through a primary government securities dealer, as defined by the Federal Reserve or a financial institution doing business in the State of Texas; The term of any single repurchase agreement may be made coterminous with the need to expend bond proceeds, provided the purchase agreement allows for multiple draws at the College District's discretion and the maturity date does not exceed the expected final expenditure date.;

(vii) Bankers' Acceptances. Investment must have a 270 day or less stated maturity from date of issuance and be liquidated in full by stated maturity, be acceptable as collateral for borrowing by a federal reserve bank, and be accepted by a bank rated at least A-1 and P-1 or equivalent by a Nationally Recognized Statistical Rating Organization ("NRSRO");

(viii) Commercial Paper. Commercial paper must have a stated maturity of 270 days or less, and be rated at least A-1 or P-1 or equivalent, either by two NRSROs, or by a single NRSRO if it is also fully secured by an irrevocable letter of credit issued by a domestic bank. Both taxable and municipal commercial paper are authorized;

(ix) No-Load Money Market Mutual Fund. Fund must be regulated by the Securities and Exchange Commission (SEC"); have a dollar-weighted average stated maturity of 60 days or less; and include in its investment objectives the maintenance of a stable net asset value of $1 for each share. Such investments may not exceed, in the aggregate, more than 15 percent of the College District's monthly average fund balance, excluding bond proceeds and reserves and other funds held for debt service, and the investment in any single mutual fund may not exceed 10 percent of the total assets of the Mutual Fund;

(x) No-Load Mutual Fund. Fund must be registered with the SEC; have an average weighted maturity of less than two years; be invested exclusively in obligations approved by this policy; be continuously rated as to investment quality by at least one nationally recognized investment rating firm of not less than AAA or its equivalent; and conform to the requirements set forth in Section 2256.016 of the Texas

Government Code relating to the eligibility of investment pools to receive and invest funds of investing entities. The investment in any single mutual fund may not exceed 10 percent of the total assets owned or controlled by the College District, including bond proceeds and reserves and other funds held for debt service;

(xi) Public Fund Investment Pools. Public funds investment pools must be specifically authorized by the Board through resolution, and are subject to the limitations of PFIA Section 2256.016;

(xii) Interest bearing bank savings deposits issued by state and national banks or savings bank or a state or federal credit union (having their main or branch office in Texas) that are guaranteed or insured by the Federal Deposit Insurance Corporation or National Credit Union Share Insurance Fund (or their successor organizations) or secured by an FHLB Letter of Credit. Also included are collateralized interest- bearing savings deposit that have secured the uninsured portion of deposits with pledged collateral as provided for in this policy (see "Collateralization")

(xiii) Bank Sweep Accounts. Investments in bank sweep accounts are permitted provided they offer daily liquidity and invested in compliance with this Policy.

Debt Service/Reserve/Construction Funds

In addition to the authorized investments above, bonds proceeds may be invested in the following *[Texas Government Code Section 2256.011 and 015]*:

(i) Guaranteed Investment Contracts ("GICs") having a defined termination date corresponding to the expected final draw date on the projected construction schedule, secured by U.S. Government direct or agency obligations.

(ii) Flexible Repurchase Agreement ("Flex Repo") with a defined termination date of and corresponding to the expected final draw date on the projected construction schedule secured by U.S. Government direct or agency obligations at a minimum of 102% of outstanding principal balance plus accrued interest.

Other Funds

All funds authorized for Operating Funds are also authorized for Other Funds.

Financial Institutions and Broker/Dealers

All investment transactions require that competitive bids or offers be received from at least three (3) qualified broker/dealers or investment providers in accordance with Texas law. If the College

District has hired an Investment Advisor, the advisor shall obtain and document competitive bids and offers on all transactions and present these to the College District as part of its standard trade documentation. (This section excludes transactions with money market mutual funds and public funds investment pools, which are deemed to be made at prevailing market rates).

The Board must adopt and annually review a list of qualified dealer/brokers authorized to engage in investment transactions with the College District. *[Texas Government Code Section 2256.025]* A written copy of this investment policy shall be presented to any business organization defined as an investment pool or investment management firm under contract to manage the College District's portfolio with discretionary authority. *[Texas Government Code Section 2256.005(k)*. A Qualified representative [Texas Government Code Section 2256.002(10)] of the business organization must execute a written instrument substantially to the effect that the registered principal has received and thoroughly reviewed the investment policy of the College District and acknowledged that the organization has implemented procedures and controls in an effort to preclude transactions that are not authorized by this policy. *[Texas Government Code Section 2256.005(k)]* Form C.1.7.F Texas Public Funds Investment Act Certification by Dealer may be used to satisfy this requirement.

Safekeeping and Custody

Securities will be held by a third-party custodian designated by the Board and held in the College District's name as evidence by safekeeping records of the institutions with which the securities are deposited. All transactions, except those with an investment pool or mutual fund, will be settled on a delivery versus payment method. *[Texas Government Code Section 2256.005(b)(4) (e)]*

Collateralization

The College District shall require full collateralization of funds on deposit with depository institutions, other than investments, in accordance with the Texas Government Code, Chapter 2257. In order to anticipate market changes and provide a level of security for all funds, the collateralization level shall be at least100% percent of market value of principal and accrued interest on the deposits, less any amount insured by the FDIC. Collateral should be repriced daily. This collateral will be held by a third party and not be subject to any security interest, lien or right of set-off by the third party. Bank deposits and repurchase agreements often require collateral substitution. If the District has a contractual agreement with an independent third-party custodian, this custody agent shall permit collateral substitution provided that the total value of the new securities maintains a market value equal to or greater than the required collateral level. Collateral used to secure direct bank deposits shall be monitored no less than monthly. *[Texas Government Code Sections 2257.021, 022,023]*

Other

Monitoring Market Prices

The market value of the portfolio will be obtained monthly from the investment advisor, or the custodian bank, as appropriate. Market value of pooled or mutual funds will be obtained from published sources, such as their websites.

Credit Downgrades

Procedures shall be maintained by the investment officer to monitor rating changes in investments (reference Appendix 2 Roles and Responsibilities). *[Texas Government Code Section 2256.005(b)4(f)]*. It is not a requirement to liquidate an investment that was an authorized investment at the time of purchase *[Texas Government Code Section 2256.017]*; however, the investment must be evaluated by the investment officer to determine if it is prudent to liquidate. Investments that are downgraded to less than the required minimum credit rating should be liquidated in a prudent manner. *[Texas Government Code Section 2256.021]*

Securities Lending

A securities lending program is authorized if it meets the conditions provided by the Texas Government Code Section and is separately approved by the Board of Trustees. *[Texas Government Code Section 2256.0115]*

Reporting

An investment report will be prepared on a quarterly basis by the investment officers(s) and the investment advisor and submitted to the Board. The report must be signed by all investment officers, and electronic signatures will be acceptable. The report must state that it was generated in compliance with the Investment Policy and PFIA, be signed by the investment officers and will minimally include the following:

(i) For separate investments: detailed investment position including type of asset, book and market value, maturity and accrued interest.

(ii) For each pooled fund group or mutual fund: name of pooled fund, ending book and market value, and accrued interest.

(iii) For all investments: dollar-weighted average maturity.

[Texas Government Code Section 2256.023]

Additionally, if an investment advisor is used, a report will be submitted at least quarterly by the investment advisor detailing the market value of the investments, utilizing a named, commonly accepted pricing source, and the performance of the investments. The pricing of mutual funds and pooled funds will be obtained directly from those institutions.

Policy Review

This policy and strategies will be reviewed not less than annually by the Associate Vice Chancellor of Finance and Fiscal Services, the Audit, Budget, and Finance Committee, and the Policy and Long-Range Planning Committee, and the Board. The Board will adopt a written statement stating that it has reviewed the policy and strategies, and the written statement so adopted will record any changes made to either the policy or strategies. *[Texas Government Code Section 2256.005(e)]*
A copy of this approved statement will be posted on the College District's website, provided to all investment dealers and investment managers doing business with the College District, and also shall be provided to other interested parties on request. Confirmation of receipt and review of this policy by persons employed by an organization providing investment services to the College District and who deal directly with College District accounts shall be received by the College District prior to the institution of such services. *[Texas Government Code Section 2256.005(k)]*

Sources:

Public Funds Investment Act, Texas Government Code Chapter 2256 Public Funds Collateral Act, Texas Government Code Chapter 2257

Form C.1.7.F Texas Public Funds Investment Act Certification by Dealer

Legal Reference - TACC Policy Reference Manual
CAK(LEGAL) Appropriations and Revenue Sources: Investments

Appendix 1

List of approved training sources: *[Texas Government Code Section 2256.007]*

- Texas Higher Education Coordinating Board
- Government Treasurers' Organization of Texas
- Government Finance Officers Association of Texas
- Alamo Area Council of Governments
- University of North Texas Center for Public Management
- Texas Association of Community College Business Officers
- Texas Municipal League
- The PFM Group

- Virtual Learning Concepts
- Texas State University
- HilltopSecurities
- Association for Financial Professionals
- TexPool Academy (provided by Federated Investors)

Appendix 2 (Procedures) Roles and Responsibilities					
			Investment Officers		
Responsibility	Board of Trustees	External Investment Advisor	Treasurer	Vice Chancellor, Associate Vice Chancellor, Controller	General Accounting
Investment Policy	Annual review and approval	Acknowledges receipt of Investment Policy. Reviews to ensure compliance with PFIA and any legislative changes.	Prepares Policy for annual review by District Compliance and Legal and subsequent approval by Board of Trustees. Documents changes.	Review	
Compliance		Acknowledges receipt of Investment Policy. Reviews to ensure compliance with PFIA and changes. Ensures investment recommendations are approved per Policy.	Assures Investment Policy is following PFIA; manages investment activity in keeping with Investment Policy.		
Trading		Recommends trades, obtains competitive bids; executes trades based on direction from Alamo Investment Officers, prepares and forwards trade tickets. Retains duplicate copies of trade tickets and support documents.	Supplies cash flow information and investment parameters for recommendations from Advisor. Reviews trade options; authorizes trades and signs trade ticket.		
Review of Investment Activity			Prepares quarterly review of activity and other relevant information. Delivers report for Board of Trustees.		
Quarterly Investment Report (PFIA required) and other external reporting, as required	Quarterly approval PFIA compliant report.		Responsible for preparing and submitting all required reporting and posting necessary information to Alamo Colleges District's website.	Reviews and signs report	
Transactional Reporting		Prepares monthly reports of investment activity, holdings, book value adjustments, accrued income on each investment portfolio.	Reviews and compares balances and activity to internal records.		
Monitoring Ratings Changes		Provides information on changes in investment ratings and credit support. Supplies quarterly report of ratings on investment holdings.	Monitors and maintains current record of borrowers' ratings and support. Determines disposition of investments held due to ratings changes. Informs other Investment Officers with significant changes.		
Accounting			Prepares journal entries for all investment activity, interest income. Internal reconciliation of investment balances and interest income. Journal entries are supported by trade tickets and safekeeping receipts (if a purchase) and evidence of bank account activity. Prepares all footnotes and schedules in CAFR relating to investments.		Reviews and approves Journal Entries. Enters into General Ledger. Reconciles investment accounts.
Safekeeping			Enters all trades into bank safekeeping system- monitors delivery versus payment for securities purchased/sold and credit received for maturing investments and coupon payments.		
Collateral		Reviews collateral upon request.	Orders and monitors required collateral for depository funds in excess of FDIC insured amounts.		
Training	Attend training within six months of taking office.		Minimum 10 hours (is in excess of PFIA requirement) approved training each 2 years.	Minimum 5 hours approved training each 2 years.	