

# **Rockwall Independent School District**

## **Board Agenda Item Synopsis**

**Subject: Consider Approval of Resolution Regarding Investment Policies and Strategies Review, Investment Training Providers, and Qualified Brokers**

### **Background Information:**

Pursuant to Board Policy CDA (Legal) and Government Code 2256.005(e), the Board shall review its investment policy and investment strategies not less than annually. The board shall adopt a written instrument by resolution stating that it has reviewed the investment policy and investment strategies and that the written instrument so adopted shall record any changes made to either the investment policy or investment strategies.

Pursuant to Board Policy CDA (Legal) and Government Code 2256.005(m), the District shall perform a compliance audit of management controls on investments and adherence to the district's established investment policies. The compliance audit shall be performed in conjunction with the annual financial audit.

Pursuant to Board Policy CDA (Legal) and Government Code 2256.008(a), the Board shall approve the independent training providers providing investment training to the designated investment officer[s] of the District.

Pursuant to Board Policy CDA (Legal) and Government Code 2256.025, the Board shall at least annually, review, revise, and adopt a list of qualified brokers that are authorized to engage in investment transactions with a district.

### **Administrative Consideration:**

In compliance with the applicable Board policies and Government Code sections and subsections referenced above, the Administration presents the following to the Board of Trustees:

1. The attached resolution recommending the investment policies and strategies, qualified brokers, and training providers for the 2018-2019 fiscal year; and
2. The Annual Investment Report for the year ending June 30, 2018.

### **Budgetary Impact:**

No appropriations necessary from the District.

### **Goals:**

- We will provide authentic and innovative learning experiences for every learner.
- We will ensure consistent instructional processes to achieve and maintain high performance for all learners.
- We will ensure continuous improvement through maximizing fiscal efficiency to address growth.
- We will partner with our community to enhance the learner experience.
- We will engage in consistent and interactive communication.
- We will ensure a safe and civil environment that is responsive to the needs of our community.
- We will attract, recruit, develop, and retain high-quality professional staff.

### **Recommendation:**

The Administration recommends that the Board of Trustees approve the Resolution approving the Investment Policies and Strategies, and the Investment Training Providers.

**Submitted by:**

*David Carter, CPA*

*Senior Chief Financial Officer*

**Recommended by:**

*JJ Villarreal, Ed.D.*

*Superintendent*

**Meeting Date:** November 12, 2018

# Rockwall ISD

## Annual Investment Review

The District abides by the following investment policies:

- CDA (Legal) – Public Funds Investment Act
- CDA (Local) –
  - Approved Investment Instruments
  - Safety
  - Liquidity & Maturity
  - Diversity
  - Funds/Strategies
  - Investments by Fund Types
  - Internal Controls
  - Annual Review
    - “The Board shall review the investment policy and investment strategies not less than annually and shall document its review in writing, which shall include whether the any changes were made to either the investment policy or investment strategies.”

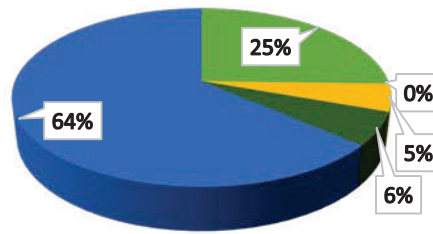
During Fiscal Year 2018, interest rates continued to increase. Excess funds not needed for current operations are invested in Investment Pools to yield the highest returns possible. Operating funds are held at Lone Star Investment Pool and bond and other excess funds have been invested in Texas CLASS Investment Pool by Public Trust, the Districts’ Investment Advisors. District Investment Officers have invested funds held at Texas Term Investment Pool in Commercial Paper options, which are fixed rate term investments rated A1/P1, which complies with Rockwall ISD Investment Policy and Government Code 2256.013.

District Investment Officers are in regular contact with Public Trust Advisors who monitor market conditions in order to invest funds to receive the maximum returns available. Currently, Public Trust advises that because market rates are expected to continue increasing, it is best to remain invested in the Investment Pools where investments are invested shorter on the yield curve. In addition, funds are liquid and available immediately for project and operating needs.

### Investment Balances at 6/30/18

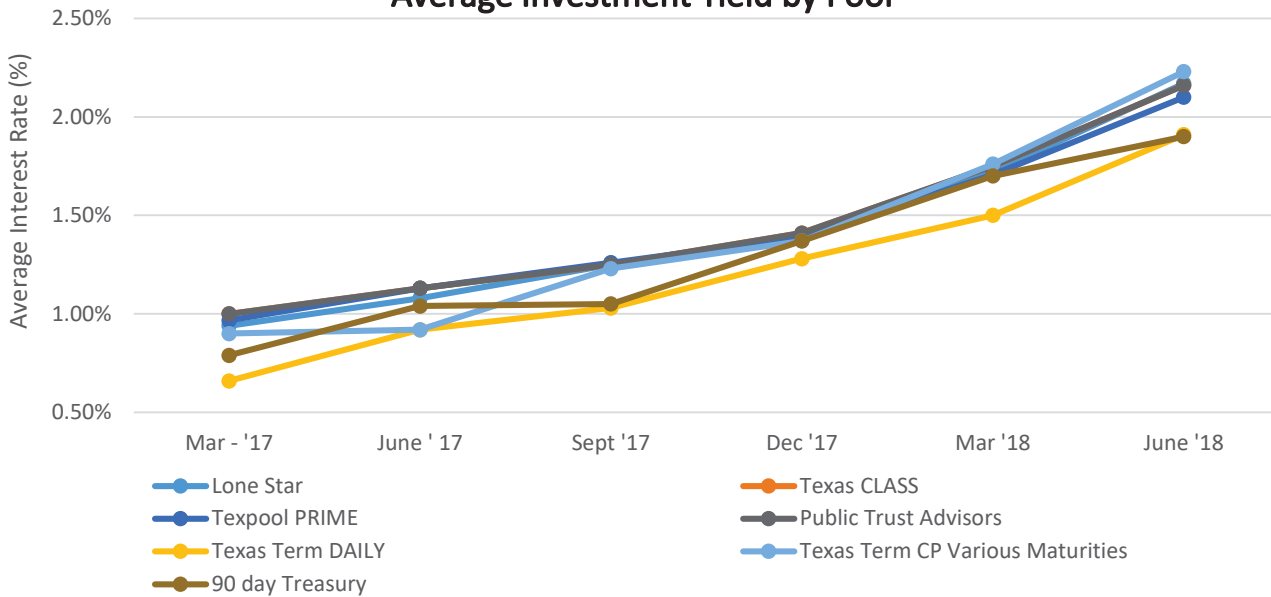
Investment Pool	Market Value	Percentage
Lone Star Investment Pool	\$45,935,235	25.44%
Texas CLASS	42,558	0.02%
TexPool	8,999,091	4.98%
Texas Term	10,727,393	5.94%
Public Trust Advisors	114,876,002	63.62%
<b>Totals</b>	<b>\$180,580,279</b>	<b>100%</b>

### Rockwall ISD's Investment by Pool



■ Lone Star Investment Pool 
 ■ Texas CLASS 
 ■ TexPool 
 ■ Texas Term 
 ■ Public Trust Advisors

### Average Investment Yield by Pool




Rockwall Independent School District  
Investment Report  
For the Year Ended June 30, 2018

SUMMARY BY POOL	Beginning Balance 07/01/17	Deposits	Withdrawals	Interest for Year	Ending Balance 06/30/18	Interest Rate at 6/30/18	Interest 2017-2018
<b>Lone Star Investment Pool</b>							
<b>Liquidity/Corporate Fund</b>							
General Fund	\$ 21,924,517.51	\$ 136,437,938.70	\$ (126,862,368.62)	\$ 560,003.91	\$ 32,060,091.50		\$ 560,003.91
Food Service	\$ 2,378,410.27	\$ 2,460,289.29	\$ (1,966,000.00)	\$ 37,570.58	\$ 2,910,270.14		\$ 37,570.58
Debt Service Fund	\$ 10,980,089.18	\$ 35,162,305.64	\$ (35,339,064.25)	\$ 161,394.22	\$ 10,964,724.79		\$ 161,394.22
Healthcare Plan	\$ 153,413.88	\$ -	\$ (154,900.83)	\$ 1,635.99	\$ 149.04		\$ 1,635.99
	<u>\$ 35,436,430.84</u>	<u>\$ 174,060,533.63</u>	<u>\$ (164,322,333.70)</u>	<u>\$ 760,604.70</u>	<u>\$ 45,935,235.47</u>	<u>2.17%</u>	<u>\$ 760,604.70</u>
<b>Texas CLASS</b>							
General Fund	\$ 32,900.81	\$ -	\$ -	\$ 516.10	\$ 33,416.91		\$ 516.10
Debt Service Fund	\$ 6,659.72	\$ -	\$ -	\$ 104.48	\$ 6,764.20		\$ 104.48
Capital Projects 2016	\$ 2,339.88	\$ -	\$ -	\$ 36.66	\$ 2,376.54		\$ 36.66
	<u>\$ 41,900.41</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 657.24</u>	<u>\$ 42,557.65</u>	<u>2.16%</u>	<u>\$ 657.24</u>
<b>TexPool</b>							
General Fund	\$ 7,952,548.72	\$ -	\$ -	\$ 123,386.14	\$ 8,075,934.86		\$ 123,386.14
Debt Service Fund	\$ 909,052.23	\$ -	\$ -	\$ 14,104.19	\$ 923,156.42		\$ 14,104.19
	<u>\$ 8,861,600.95</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 137,490.33</u>	<u>\$ 8,999,091.28</u>	<u>2.10%</u>	<u>\$ 137,490.33</u>
<b>Texas Term</b>							
General Fund - Daily	\$ 51,143.04	\$ 37,592,169.87	\$ (37,500,000.00)	\$ 30,753.28	\$ 174,066.19	1.91%	\$ 30,753.28
Gen Fund - Term (90 day CP - Maturity 11/02/17)	\$ 7,516,089.04		\$ (7,516,089.04)				\$ -
Gen Fund - Term (180 day CP - Maturity 11/7/17)	\$ 2,452,359.44		\$ (2,452,359.44)				\$ -
General Fund - Term (90 day CP - Maturity 2/1/18)	\$ -	\$ 7,600,000.00	\$ (7,655,810.69)	\$ 55,810.69	\$ (0.00)	1.36%	\$ 55,810.69
General Fund - Term (90 day CP - Maturity 2/1/18)	\$ -	\$ 2,400,000.00	\$ (2,417,254.75)	\$ 17,254.75	\$ -	1.37%	\$ 17,254.75
Gen Fund - Term (90 day CP - Maturity 5/1/18)	\$ -	\$ 10,000,000.00	\$ (10,028,931.51)	\$ 28,931.51	\$ 0.00	1.76%	\$ 28,931.51
Gen Fund - Term (90 day CP - Maturity 8/27/18)	\$ -	\$ 10,000,000.00			\$ 10,000,000.00		\$ -
Debt Service Fund - Daily	\$ (0.00)				\$ (0.00)		\$ -
Capital Projects - Series '10	\$ 545,615.80			\$ 7,229.03	\$ 552,844.83		\$ 7,229.03
Accrued Interest Receivable	\$ 22,206.64		\$ (22,206.64)	\$ 18,939.72	\$ 18,939.72		\$ 18,939.72
	<u>\$ 10,587,413.96</u>	<u>\$ 67,592,169.87</u>	<u>\$ (67,592,652.07)</u>	<u>\$ 158,918.98</u>	<u>\$ 10,745,850.74</u>		<u>\$ 158,918.98</u>
<b>Public Trust Advisors/UMB Bank</b>							
General Fund	\$ 13,913,186.10	\$ -	\$ -	\$ 216,987.70	\$ 14,130,173.80		\$ 216,987.70
Debt Service Fund	\$ 8,875,927.36	\$ -	\$ -	\$ 138,427.57	\$ 9,014,354.93		\$ 138,427.57
Food Service	\$ 109,873.99	\$ -	\$ -	\$ 1,713.62	\$ 111,587.61		\$ 1,713.62
Capital Projects Land	\$ 111,922.40			\$ 1,745.48	\$ 113,667.88		\$ 1,745.48
Capital Projects 2016 '07 Bond	\$ 12,521,706.10		\$ (5,567,100.00)	\$ 127,097.02	\$ 7,081,703.12		\$ 127,097.02
Capital Projects 2016 '15 Bond	\$ 68,501,052.29		\$ (60,850,000.00)	\$ 519,457.88	\$ 8,170,510.17		\$ 519,457.88
Capital Projects 2017 696	\$ 75,083,022.30			\$ 1,170,981.85	\$ 76,254,004.15		\$ 1,170,981.85
	<u>\$ 179,116,690.54</u>	<u>\$ -</u>	<u>\$ (66,417,100.00)</u>	<u>\$ 2,176,411.12</u>	<u>\$ 114,876,001.66</u>	<u>2.16%</u>	<u>\$ 2,176,411.12</u>
<b>Total for Investments</b>	<u>\$ 234,044,036.70</u>	<u>\$ 241,652,703.50</u>	<u>\$ (298,332,085.77)</u>	<u>\$ 3,234,082.37</u>	<u>\$ 180,598,736.80</u>		<u>\$ 3,234,082.37</u>

SUMMARY BY FUND	Beginning Balance 7/1/2017	Deposits	Withdrawals	Interest for Quarter	Ending Balance 6/30/2018	Interest Year to Date
General Fund	\$ 53,864,951.30	\$ 204,030,108.57	\$ (194,455,020.69)	\$ 1,052,583.80	\$ 64,492,622.98	\$ 1,052,583.80
Food Service	\$ 2,488,284.26	\$ 2,460,289.29	\$ (1,966,000.00)	\$ 39,284.20	\$ 3,021,857.75	\$ 39,284.20
Debt Service Fund	\$ 20,771,728.49	\$ 35,162,305.64	\$ (35,339,064.25)	\$ 314,030.46	\$ 20,909,000.34	\$ 314,030.46
Capital Projects	\$ 156,765,658.77	\$ -	\$ (66,417,100.00)	\$ 1,826,547.92	\$ 92,175,106.69	\$ 1,826,547.92
Healthcare Plan	\$ 153,413.88	\$ -	\$ (154,900.83)	\$ 1,635.99	\$ 149.04	\$ 1,635.99
<b>Total for Investments</b>	<u>\$ 234,044,036.70</u>	<u>\$ 241,652,703.50</u>	<u>\$ (298,332,085.77)</u>	<u>\$ 3,234,082.37</u>	<u>\$ 180,598,736.80</u>	<u>\$ 3,234,082.37</u>

I certify that the above investments comply with RISD Policy CDA.



David Carter, CPA  
Senior Chief Financial Officer  
Investment Officer



Jamie Tomalin, CPA  
Executive Director of Finance  
Investment Officer



Bobby Vaughan  
Director of Accounting  
Investment Officer

OTHER REVENUES  
INVESTMENTS

CDA  
(LEGAL)

All investments made by a district shall comply with the Public Funds Investment Act (Texas Government Code Chapter 2256, Subchapter A) and all federal, state, and local statutes, rules or regulations. *Gov't Code 2256.026*

WRITTEN POLICIES

Investments shall be made in accordance with written policies approved by the board. The investment policies must primarily emphasize safety of principal and liquidity and must address investment diversification, yield, and maturity and the quality and capability of investment management. The policies must include:

1. A list of the types of authorized investments in which a district's funds may be invested;
2. The maximum allowable stated maturity of any individual investment owned by the district;
3. For pooled fund groups, the maximum dollar-weighted average maturity allowed based on the stated maturity date of the portfolio;
4. Methods to monitor the market price of investments acquired with public funds;
5. A requirement for settlement of all transactions, except investment pool funds and mutual funds, on a delivery versus payment basis; and
6. Procedures to monitor rating changes in investments acquired with public funds and the liquidation of such investments consistent with the provisions of Government Code 2256.021 [see LOSS OF REQUIRED RATING, below].

*Gov't Code 2256.005(b)*

ANNUAL REVIEW

The board shall review its investment policy and investment strategies not less than annually. The board shall adopt a written instrument stating that it has reviewed the investment policy and investment strategies and that the written instrument so adopted shall record any changes made to either the investment policy or investment strategies. *Gov't Code 2256.005(e)*

ANNUAL AUDIT

A district shall perform a compliance audit of management controls on investments and adherence to the district's established investment policies. The compliance audit shall be performed in conjunction with the annual financial audit. *Gov't Code 2256.005(m)*

INVESTMENT  
STRATEGIES

As part of the investment policy, a board shall adopt a separate written investment strategy for each of the funds or group of funds under the board's control. Each investment strategy must describe

the investment objectives for the particular fund under the following priorities in order of importance:

1. Understanding of the suitability of the investment to the financial requirements of the district;
2. Preservation and safety of principal;
3. Liquidity;
4. Marketability of the investment if the investment needs to be liquidated before maturity;
5. Diversification of the investment portfolio; and
6. Yield.

*Gov't Code 2256.005(d)*

INVESTMENT  
OFFICER

A district shall designate one or more officers or employees as investment officer(s) to be responsible for the investment of its funds. If the board has contracted with another investing entity to invest its funds, the investment officer of the other investing entity is considered to be the investment officer of the contracting board's district. In the administration of the duties of an investment officer, the person designated as investment officer shall exercise the judgment and care, under prevailing circumstances that a prudent person would exercise in the management of the person's own affairs, but the board retains the ultimate responsibility as fiduciaries of the assets of the district. Unless authorized by law, a person may not deposit, withdraw, transfer, or manage in any other manner the funds of the district. Authority granted to a person to invest the district's funds is effective until rescinded by the district or until termination of the person's employment by a district, or for an investment management firm, until the expiration of the contract with the district. *Gov't Code 2256.005(f)*

A district or investment officer may use the district's employees or the services of a contractor of the district to aid the investment officer in the execution of the officer's duties under Government Code, Chapter 2256. *Gov't Code 2256.003(c)*

INVESTMENT  
TRAINING  
INITIAL

Within 12 months after taking office or assuming duties, the chief financial officer and the investment officer of a district shall attend at least one training session from an independent source approved either by the board or by a designated investment committee advising the investment officer. This initial training must contain at least ten hours of instruction relating to their respective responsibilities under the Public Funds Investment Act. *Gov't Code 2256.008(a)*

OTHER REVENUES  
INVESTMENTS

CDA  
(LEGAL)

ONGOING

The chief financial officer and the investment officer must also attend an investment training session not less than once in a two-year period that begins on the first day of the district's fiscal year and consists of the two consecutive fiscal years after that date, and receive not less than eight hours of instruction relating to investment responsibilities under the Public Funds Investment Act from an independent source approved by the board or a designated investment committee advising the investment officer. If a district has contracted with another investing entity to invest the district's funds, this training requirement may be satisfied by having a board officer attend four hours of appropriate instruction in a two-year period that begins on the first day of the district's fiscal year and consists of the two consecutive fiscal years after that date. *Gov't Code 2256.008(a-1)-(b)*

Investment training shall include education in investment controls, security risks, strategy risks, market risks, diversification of investment portfolio, and compliance with the Government Code, Chapter 2256. *Gov't Code 2256.008(c)*

STANDARD OF  
CARE

Investments shall be made with judgment and care, under prevailing circumstances that a person of prudence, discretion, and intelligence would exercise in the management of his or her own affairs, not for speculation, but for investment, considering the probable safety of capital and the probable income to be derived. Investments shall be governed by the following objectives in order of priority:

1. Preservation and safety of principal;
2. Liquidity; and
3. Yield.

In determining whether an investment officer has exercised prudence with respect to an investment decision, the following shall be taken into consideration:

1. The investment of all funds, rather than the prudence of a single investment, over which the officer had responsibility.
2. Whether the investment decision was consistent with a board's written investment policy.

*Gov't Code 2256.006*

PERSONAL  
INTEREST

A district investment officer who has a personal business relationship with a business organization offering to engage in an investment transaction with the district shall file a statement disclosing that personal business interest. An investment officer who is relat-



ed within the second degree by affinity or consanguinity, as determined by Government Code Chapter 573, to an individual seeking to sell an investment to the investment officer's district shall file a statement disclosing that relationship. A required statement must be filed with the board and with the Texas Ethics Commission. For purposes of this policy, an investment officer has a personal business relationship with a business organization if:

1. The investment officer owns ten percent or more of the voting stock or shares of the business organization or owns \$5,000 or more of the fair market value of the business organization;
2. Funds received by the investment officer from the business organization exceed ten percent of the investment officer's gross income for the previous year; or
3. The investment officer has acquired from the business organization during the previous year investments with a book value of \$2,500 or more for the personal account of the investment officer.

*Gov't Code 2256.005(i)*

QUARTERLY  
REPORTS

Not less than quarterly, an investment officer shall prepare and submit to a board a written report of investment transactions for all funds covered by the Public Funds Investment Act for the preceding reporting period. This report shall be presented to a board and a superintendent, not less than quarterly, within a reasonable time after the end of the reporting period. The report must:

1. Contain a detailed description of the investment position of a district on the date of the report.
2. Be prepared jointly and signed by all district investment officers.
3. Contain a summary statement for each pooled fund group (i.e., each internally created fund in which one or more accounts are combined for investing purposes) that states the:
  - a. Beginning market value for the reporting period;
  - b. Ending market value for the period; and
  - c. Fully accrued interest for the reporting period.
4. State the book value and market value of each separately invested asset at the end of the reporting period by the type of asset and fund type invested.
5. State the maturity date of each separately invested asset that has a maturity date.

OTHER REVENUES  
INVESTMENTS

CDA  
(LEGAL)

6. State the account or fund or pooled group fund in a district for which each individual investment was acquired.
7. State the compliance of the investment portfolio of a district as it relates to the district's investment strategy expressed in the district's investment policy and relevant provisions of Government Code, Chapter 2256.

If a district invests in other than money market mutual funds, investment pools or accounts offered by its depository bank in the form of certificates of deposit, or money market accounts or similar accounts, the reports shall be formally reviewed at least annually by an independent auditor, and the result of the review shall be reported to the board by that auditor.

*Gov't Code 2256.023*

SELECTION OF  
BROKER

A board or a designated investment committee, shall, at least annually, review, revise, and adopt a list of qualified brokers that are authorized to engage in investment transactions with a district.

*Gov't Code 2256.025*

AUTHORIZED  
INVESTMENTS

A board may purchase, sell, and invest its funds and funds under its control in investments described below, in compliance with its adopted investment policies and according to the standard of care set out in this policy. Investments may be made directly by a board or by a nonprofit corporation acting on behalf of the board or an investment pool acting on behalf of two or more local governments, state agencies, or a combination of the two. *Gov't Code 2256.003(a)*

In the exercise of these powers, a board may contract with an investment management firm registered under the Investment Advisers Act of 1940 (15 U.S.C. Section 80b-1 et seq.) or with the State Securities Board to provide for the investment and management of its public funds or other funds under its control. A contract made for such purpose may not be for a term longer than two years. A renewal or extension of the contract must be made by a board by order, ordinance, or resolution. *Gov't Code 2256.003(b)*

The following investments are authorized for districts, although the board may specify in its investment policy that any such investment is not suitable, per Government Code 2256.005(j):

1. Obligations, including letters of credit, of the United States or its agencies and instrumentalities; direct obligations of the state of Texas or its agencies and instrumentalities; collateralized mortgage obligations directly issued by a federal agency or instrumentality of the United States, the underlying security for which is guaranteed by an agency or instrumentality of the

United States; 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, the United States, or their respective agencies and instrumentalities, including obligations that are fully guaranteed or insured by the Federal Deposit Insurance Corporation (FDIC) or by the explicit full faith and credit of the United States; 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; and bonds issued, assumed, or guaranteed by the state of Israel. *Gov't Code 2256.009(a)*

The following investments are not authorized:

- a. Obligations whose payment represents the coupon payments on the outstanding principal balance of the underlying mortgage-backed security collateral and pays no principal.
- b. Obligations whose payment represents the principal stream of cash flow from the underlying mortgage-backed security collateral and bears no interest.
- c. Collateralized mortgage obligations that have a stated final maturity date of greater than ten years.
- d. Collateralized mortgage obligations the interest rate of which is determined by an index that adjusts opposite to the changes in a market index.

*Gov't Code 2256.009(b)*

2. Certificates of deposit or share certificates issued by a depository institution that has its main office or a branch office in Texas that is guaranteed or insured by the FDIC or its successor or the National Credit Union Share Insurance Fund or its successor and is secured by obligations described in item 1 above, including mortgage-backed securities directly issued by a federal agency or instrumentality that have a market value of not less than the principal amount of the certificates [but excluding those mortgage-backed securities described in Section 2256.009(b)] or secured in any other manner and amount provided by law for the deposits of the investing entity. *Gov't Code 2256.010(a)*

In addition to the authority to invest funds in certificates of deposit under the previous section, an investment in certificates of deposit made in accordance with the following conditions is an authorized investment under Government Code 2256.010:

- a. The funds are invested by the district through a broker that has its main office or a branch office in this state and is selected from a list adopted by the district as required by Government Code 2256.025, or a depository institution that has its main office or a branch office in this state and that is selected by the district;
- b. The broker or depository institution selected by the district arranges for the deposit of the funds in certificates of deposit in one or more federally insured depository institutions, wherever located, for the account of the district;
- c. The full amount of the principal and accrued interest of each of the certificates of deposit is insured by the United States or an instrumentality of the United States; and
- d. The district appoints the depository institution selected by the district, an entity described by Government Code 2257.041(d), or a clearing broker-dealer registered with the Securities and Exchange Commission and operating pursuant to Securities and Exchange Commission Rule 15c3-3 (17 C.F.R. Section 240.15c3-3) as custodian for the district with respect to the certificates of deposit issued for the account of the district entity.

*Gov't Code 2256.010(b)*

The investment policies may provide that bids for certificates of deposit be solicited orally, in writing, electronically, or in any combination of those methods. *Gov't Code 2256.005(c)*

3. Fully collateralized "repurchase agreements" [as defined by Government Code 2256.011(b)] that have a defined termination date; are secured by a combination of cash and obligations of the United States or its agencies and instrumentalities; require the securities being purchased by the district or cash held by the district to be pledged to the district, held in the district's name, and deposited with the district or a third party selected and approved by the district, and are placed through a primary government securities dealer, as defined by the Federal Reserve or a financial institution doing business in Texas. The term of any reverse security repurchase agreement may not exceed 90 days after the date the reverse security repurchase agreement is delivered. Money received by a district under the terms of a reverse security repurchase agreement shall be used to acquire additional authorized investments, but the term of the authorized investments acquired must mature not later than the expiration date stated in

the reverse security repurchase agreement. *Gov't Code 2256.011*

4. A securities lending program if:
  - a. The value of securities loaned is not less than 100 percent collateralized, including accrued income, and the loan allows for termination at any time;
  - b. The loan is secured by:
    - (1) Pledged securities described by Government Code 2256.009;
    - (2) Pledged irrevocable letters of credit issued by a bank that is organized and existing under the laws of the United States or any other state and continuously rated by at least one nationally recognized investment rating firm at not less than A or its equivalent; or
    - (3) Cash invested in accordance with Government Code 2256.009, 2256.013, 2256.014, or 2256.016;
  - c. The terms of the loan require that the securities being held as collateral be pledged to the investing entity, held in the investing entity's name, and deposited at the time the investment is made with the entity or with a third party selected by or approved by the investing entity; and
  - d. The loan is placed through a primary government securities dealer or a financial institution doing business in this state.

An agreement to lend securities under a securities lending program must have a term of one year or less.

*Gov't Code 2256.0115*

5. Banker's acceptance, with a stated maturity of 270 days or fewer from the date of issuance that will be liquidated in full at maturity, which is eligible for collateral for borrowing from a Federal Reserve Bank, and is accepted by a bank meeting the requirements of Government Code 2256.012(4). *Gov't Code 2256.012*
6. Commercial paper that has a stated maturity of 270 days or fewer from the date of issuance and is rated not less than A-1 or P-1 or an equivalent rating by at least two nationally recognized credit rating agencies or by one nationally recognized credit rating agency provided the commercial paper is fully

secured by an irrevocable letter of credit issued by a bank organized and existing under United States law or the law of any state. *Gov't Code 2256.013*

7. No-load money market mutual funds that:
  - a. Are registered with and regulated by the Securities and Exchange Commission;
  - b. Provide a district with a prospectus and other information required by the Securities and Exchange Act of 1934 (15 U.S.C. 78a et seq.) or the Investment Company Act of 1940 (15 U.S.C. 80a-1 et seq.);
  - c. Have a dollar-weighted average stated maturity of 90 days or fewer; and
  - d. Include in their investment objectives the maintenance of a stable net asset value of \$1 for each share.

However, investments in no-load money market mutual funds shall be limited to the percentages authorized by Government Code 2256.014(c).

8. No-load mutual funds that:
  - a. Are registered with the Securities and Exchange Commission;
  - b. Have an average weighted maturity of less than two years;
  - c. Are invested exclusively in obligations approved by Government Code Chapter 2256, Subchapter A, regarding authorized investments (Public Funds Investment Act);
  - d. Are continuously rated by at least one nationally recognized investment rating firm of not less than AAA or its equivalent; and
  - e. Conform to the requirements in Government Code 2256.016(b) and (c) relating to the eligibility of investment pools to receive and invest funds of investing entities.

Investments in no-load mutual funds shall be limited to the percentages authorized by Government Code 2256.014(c). In addition, a district may not invest any portion of bond proceeds, reserves, and funds held for debt service, in no-load mutual funds described in this item.

*Gov't Code 2256.014*

9. A guaranteed investment contract, as an investment vehicle for bond proceeds, if the guaranteed investment contract:
  - a. Has a defined termination date.
  - b. Is secured by obligations described by Government Code 2256.009(a)(1), excluding those obligations described by Section 2256.009(b), in an amount at least equal to the amount of bond proceeds invested under the contract.
  - c. Is pledged to a district and deposited with the district or with a third party selected and approved by the district.

Bond proceeds, other than bond proceeds representing reserves and funds maintained for debt service purposes, may not be invested in a guaranteed investment contract with a term longer than five years from the date of issuance of the bonds.

To be eligible as an authorized investment:

- a. A board must specifically authorize guaranteed investment contracts as eligible investments in the order, ordinance, or resolution authorizing the issuance of bonds.
- b. A district must receive bids from at least three separate providers with no material financial interest in the bonds from which proceeds were received.
- c. A district must purchase the highest yielding guaranteed investment contract for which a qualifying bid is received.
- d. The price of the guaranteed investment contract must take into account the reasonably expected drawdown schedule for the bond proceeds to be invested.
- e. The provider must certify the administrative costs reasonably expected to be paid to third parties in connection with the guaranteed investment contract.

*Gov't Code 2256.015*

10. A public funds investment pool meeting the requirements of Government Code 2256.016 and 2256.019, if a board authorizes the investment in the particular pool by resolution. *Gov't Code 2256.016, .019*
11. Corporate bonds: A district that qualifies as an issuer as defined by Government Code 1371.001 [see CCF] may purchase, sell, and invest its funds and funds under its control in

“corporate bonds” (as defined in Government Code 2256.0204(a)) that, at the time of purchase, are rated by a nationally recognized investment rating firm “AA” or the equivalent and have a stated final maturity that is not later than the third anniversary of the date the corporate bonds were purchased. *Gov’t Code 2256.0204(b)–(c)*

The district is not authorized to:

- a. Invest in the aggregate more than 15 percent of its monthly average fund balance, excluding bond proceeds, reserves, and other funds held for the payment of debt service, in corporate bonds; or
- b. Invest more than 25 percent of the funds invested in corporate bonds in any one domestic business entity, including subsidiaries and affiliates of the entity.

*Gov’t Code 2256.0204(d)*

The district may purchase, sell, and invest its funds and funds under its control in corporate bonds if the board:

- a. Amends its investment policy to authorize corporate bonds as an eligible investment;
- b. Adopts procedures to provide for monitoring rating changes in corporate bonds acquired with public funds, and liquidating the investment in corporate bonds; and
- c. Identifies the funds eligible to be invested in corporate bonds.

*Gov’t Code 2256.0204(e)*

The district investment officer, acting on behalf of the district, shall sell corporate bonds in which the district has invested its funds not later than the seventh day after the date a nationally recognized investment rating firm:

- a. Issues a release that places the corporate bonds or the domestic business entity that issued the corporate bonds on negative credit watch or the equivalent, if the corporate bonds are rated “AA” or the equivalent at the time the release is issued; or
- b. Changes the rating on the corporate bonds to a rating lower than “AA” or the equivalent.

*Gov’t Code 2256.0204(f)*

Corporate bonds are not an eligible investment for a public funds investment pool. *Gov’t Code 2256.0204(g)*



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CHANGE IN LAW	A district is not required to liquidate investments that were authorized investments at the time of purchase. <i>Gov't Code 2256.017</i>
LOSS OF REQUIRED RATING	An investment that requires a minimum rating does not qualify as an authorized investment during the period the investment does not have the minimum rating. A district shall take all prudent measures that are consistent with its investment policy to liquidate an investment that does not have the minimum rating. <i>Gov't Code 2256.021</i>
SELLERS OF INVESTMENTS	<p>A written copy of the investment policy shall be presented to any person offering to engage in an investment transaction with a district or to an investment management firm under contract with a district to invest or manage the district's investment portfolio. For purposes of this section, a business organization includes investment pools and an investment management firm under contract with a district to invest or manage the district's investment portfolio. The qualified representative of the business organization offering to engage in an investment transaction with a district shall execute a written instrument in a form acceptable to the district and the business organization substantially to the effect that the business organization has:</p> <ol style="list-style-type: none"><li>1. Received and thoroughly reviewed the district investment policy; and</li><li>2. Acknowledged that the business organization has implemented reasonable procedures and controls in an effort to preclude investment transactions conducted between the district and the organization that are not authorized by the district's policy, except to the extent that this authorization is dependent on an analysis of the makeup of the district's entire portfolio or requires an interpretation of subjective investment standards.</li></ol> <p>The investment officer may not acquire or otherwise obtain any authorized investment described in a district's investment policy from a person who has not delivered to the district the instrument described above.</p> <p><i>Gov't Code 2256.005(k)-(l)</i></p>
DONATIONS	<p>A gift, devise, or bequest made to provide college scholarships for district graduates may be invested by a board as provided in Property Code 117.004, unless otherwise specifically provided by the terms of the gift, devise, or bequest. <i>Education Code 45.107</i></p> <p>Investments donated to a district for a particular purpose or under terms of use specified by the donor are not subject to the require-</p>

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ments of Government Code Chapter 2256, Subchapter A. *Gov't Code 2256.004(b)*

ELECTRONIC FUNDS  
TRANSFER

A district may use electronic means to transfer or invest all funds collected or controlled by the district. *Gov't Code 2256.051*

**Investment Authority**

The Superintendent or other person designated by Board resolution shall serve as the investment officer 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. All investment transactions except investment pool funds and mutual funds shall be settled on a delivery versus payment basis.

**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 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 as permitted by Government Code 2256.010.
3. Fully collateralized repurchase agreements permitted by Government Code 2256.011.
4. A securities lending program as permitted by Government Code 2256.0115.
5. Banker's acceptances as permitted by Government Code 2256.012.
6. Commercial paper as permitted by Government Code 2256.013.
7. No-load money market mutual funds and no-load mutual funds as permitted by Government Code 2256.014.
8. 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.
9. Public funds investment pools as permitted by Government Code 2256.016.

**Safety**

The primary goal of the investment program is to ensure safety of principal, to maintain liquidity, and to maximize financial returns within current market conditions in accordance with this policy. Investments shall be made in a manner that ensures the preservation of capital in the overall portfolio, and offsets during a 12-month period any market price losses resulting from interest-rate fluctuations by income received from the balance of the portfolio. No individual investment transaction shall be undertaken that jeopardizes the total capital position of the overall portfolio.

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**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.

**Liquidity and  
Maturity**

Any internally created pool fund group of the District shall have a maximum dollar weighted maturity of 180 days. The maximum allowable stated maturity of any other individual investment owned by the District shall not exceed two years from the time of purchase. The Board may specifically authorize a longer maturity for a given investment, within legal limits.

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.

**Monitoring Market  
Prices**

The investment officer 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 officer shall develop a procedure to monitor changes in investment ratings and to liquidate investments that do not maintain satisfactory ratings.

**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.

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Agency Funds	Investment strategies for agency funds shall have as their primary objectives preservation and safety of principal, investment liquidity, and maturity sufficient to meet anticipated cash flow requirements.
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. Maturities longer than one year are authorized provided legal limits are not exceeded.
Capital Project Funds	Investment strategies for capital project funds shall have as their primary objective sufficient investment liquidity to timely meet capital project obligations. Maturities longer than one year are authorized provided legal limits are not exceeded.
<b>Safekeeping and Custody</b>	The District shall retain clearly marked receipts providing proof of the District's ownership. 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.
<b>Sellers of Investments</b>	<p>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)]</p> <p>Representatives of brokers/dealers 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).</p>
<b>Soliciting Bids for CDs</b>	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.
<b>Interest Rate Risk</b>	<p>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.</p> <p>The District shall monitor interest rate risk using weighted average maturity and specific identification.</p>
<b>Internal Controls</b>	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:

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

These controls shall be reviewed by the District's independent auditing firm.

**Portfolio Report**

In addition to the quarterly report required by law and signed by the District's investment officer, a comprehensive report on the investment program and activity shall be presented annually to the Board.

**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.

## Recommendations

1. The District shall maintain a comprehensive cash management program to include the effective collection of all accounts receivable, prompt deposit of receipts to the District's depository and pools, payment of obligations, and the prudent investment of idle funds in accordance with the approved investment strategies.

The District's investment program will be conducted in such a manner to accomplish the following listed in the order of priority:

- Safety of Principal
- Sufficient liquidity to meet anticipated cash flow requirements
- Maximize financial returns within the current market conditions, in accordance with the District's investment strategy
- Diversity in terms of investments, maturity scheduling, and financial instructions to reduce risk of loss resulting from over concentration of assets in a specific class of investments, specific maturity, or specific issuer.

The District's strategies for the investment program are as follows:

- Continue to utilize the Investment Pools of TexPool, Lone Star Investment Pool, TexasTERM and Texas CLASS to invest excess funds needed for short term cash needs.
- Continue to work with Public Trust Advisors to develop an investment plan for excess funds not needed for current operations to invest funds so as to maximize investment yields while maintaining needed liquidity.

2. The District currently utilizes the expertise of the following major investment brokers. The District staff will make investment decisions for government securities and commercial paper based on competitive pricing. We recommend the Board of Trustees review and adopt this list of qualified brokers that are authorized to engage in investment transactions with the District.

- Lone Star Investments
- Texas Cooperative Liquid Assets Securities System Trust
- TexasTERM Local Government Investment Pool
- Merrill Lynch
- Morgan Stanley
- Citigroup Global Markets, Inc.
- Wells Fargo Securities
- First Southwest Company
- First Public, A Subsidiary of Texas Association of School Boards

- Coastal Securities
  - TexPool / Federated
  - BOK Financial Securities, Inc.
  - Public Trust Advisors
3. Government Code, Chapter 2256, requires investment officers to receive instruction relating to investment responsibilities under the Public Funds Investment Act from an independent source approved by the Board or a designated investment committee advising the investment officer, as provided for in the District's investment policy. We recommend the following providers for investment training:
- Texas Association of School Administrators (TASA)
  - Texas Association of School Boards (TASB)
  - Texas Association of School Business Officials (TASBO) and local affiliates
  - Texas Comptroller of Public Accounts
  - Texas State Society of Certified Public Accounts and its approved providers
  - Regional Education Service Centers including Region 10 and Region 7
  - First Southwest Company
  - Texas CLASS
  - First Public, LLC
  - Government Finance Officers Association
  - Government Treasurer's Organization of Texas (GTOT)
  - TexPool Federated
  - BOSC, Inc.
  - Public Trust Advisors, LLC
  - University of North Texas Center for Public Management
  - The PFM Group
  - Texas Municipal League
  - Patterson & Associates



**ROCKWALL INDEPENDENT SCHOOL DISTRICT**

**RESOLUTION APPROVING  
INVESTMENT POLICY, INVESTMENT STRATEGIES, and INVESTMENT TRAINING PROVIDERS**

At a lawfully called meeting on November 12, 2018, the Rockwall Independent School District Board of Trustees does hereby make the following resolution regarding approval of investment policies, investment strategies, investment brokers, and independent investment training providers.

WHEREAS, Section 2256.005(e), Texas Government Code, requires the Board to annually review its investment policy and investment strategies. Rockwall ISD Board of Trustees reviewed the district's investment policy of CDA (Local) at its November 12, 2018 regular meeting and recommended that no changes be made to the policy. The following investment strategy was discussed for the 2018-2019 fiscal year at the meeting:

The District will continue to utilize the Investment Pools of TexPool, Lone Star Investment Pool, TexasTERM and Texas CLASS to invest excess funds needed for short term cash needs.

The District's Investment Officers will continue to consult with Public Trust Advisors on the current market conditions and the utilization of other approved investment instruments so as to maximize investment yields while maintaining needed liquidity.

WHEREAS, Section 2256.005(d), Texas Government Code, requires that the District shall designate one or more officers or employees as investment officers to be responsible for the investment of its funds. The following investment officers have previously been designated:

David Carter, Senior Chief Financial Officer – January 2018  
Jamie Tomalin, Executive Director of Finance – November 2015  
Bobby Vaughan, Director of Accounting – August 2017

WHEREAS, Section 2256.008(a), Texas Government Code, requires the investment officer to attend an investment training not less than once in a two-year period and receive not less than eight hours of instruction relating to investment responsibilities from an independent source approved by the governing body of the local government. The following are independent providers of investment training:

- Texas Association of School Administrators (TASA)
- Texas Association of School Boards (TASB)
- Texas Association of School Business Officials (TASBO) and local affiliates
- Texas Comptroller of Public Accounts
- Texas State Society of Certified Public Accounts and its approved providers
- Regional Education Service Centers including Region 10 and Region 7
- First Southwest Company
- Texas CLASS
- First Public, LLC
- Government Finance Officers Association
- Government Treasurer's Organization of Texas (GTOT)
- TexPool Federated
- BOSC, Inc.
- Public Trust Advisors, LLC
- University of North Texas Center for Public Management
- The PFM Group
- Texas Municipal League
- Patterson & Associates

WHEREAS, Section 2256.003, the Texas Government Code, requires the approval of authority to invest funds, the following are authorized to engage investment transactions with the District:

- Lone Star Investments
- Texas Cooperative Liquid Assets Securities System Trust
- TexasTERM Local Government Investment Pool
- Merrill Lynch
- Morgan Stanley
- Citigroup Global Markets, Inc.
- Wells Fargo Securities
- First Southwest Company
- First Public, A Subsidiary of Texas Association of School Boards
- Coastal Securities
- TexPool / Federated
- BOSC, Inc.
- Public Trust Advisors

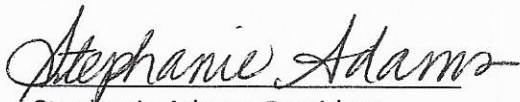
NOW, THEREFORE, BE IT RESOLVED that the Rockwall Independent Board of Trustees hereby adopts the above recitals as findings of fact and operative provisions hereof; and,

IT IS RESOLVED FURTHER, that the Board of Trustees approve the Investment Strategies stated above; and,

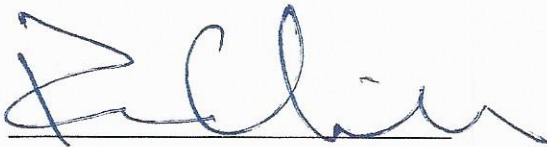
IT IS RESOLVED FURTHER, that the Board of Trustees approve the Independent investment training providers and,

IT IS RESOLVED FURTHER, that the Board of Trustees approve the qualified brokers, and

PASSED AND APPROVED, this 12<sup>th</sup> day of November, 2018 by the Board of Trustees of the Rockwall Independent School District.



Stephanie Adams, President  
Board of Trustees



Russ Childers, Secretary  
Board of Trustees