

**A RESOLUTION AMENDING AND ADOPTING THE CITY OF SHAVANO PARK
INVESTMENT POLICY**

WHEREAS, Chapter 2256 of the Texas Government Code, commonly known as the "Public Funds Investment Act," requires the City to adopt an investment policy by rule, order, ordinance, or resolution; and

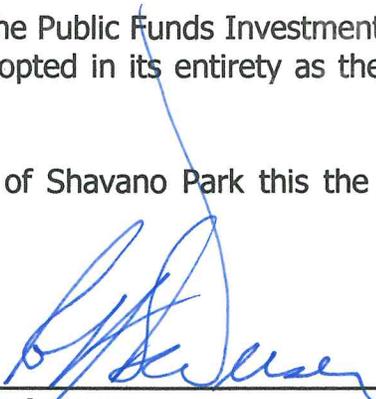
WHEREAS, The Public Funds Investment Act (Section 2256.005 a) requires the governing body to review and adopt that investment policy not less than annually, recording any changes made thereto; and

WHEREAS, the City of Shavano Park has chosen to delete State of Israel Bonds as unauthorized investments in our investment portfolio.

NOW, THEREFORE, BE IT RESOLVED AND ORDERED BY THE CITY COUNCIL OF THE CITY OF SHAVANO PARK, TEXAS:

That the City Council has complied with the requirements of the Public Funds Investment Act and the Investment Policy attached hereto as Exhibit A, is hereby adopted in its entirety as the Investment Policy of the City.

PASSED AND APPROVED by the City Council of the City of Shavano Park this the 27th day of February, 2017



Robert Werner
MAYOR

Attest: 

Zina Tedford,
City Secretary

City of Shavano Park Texas

Investment Policy

Adopted February 27, 2017

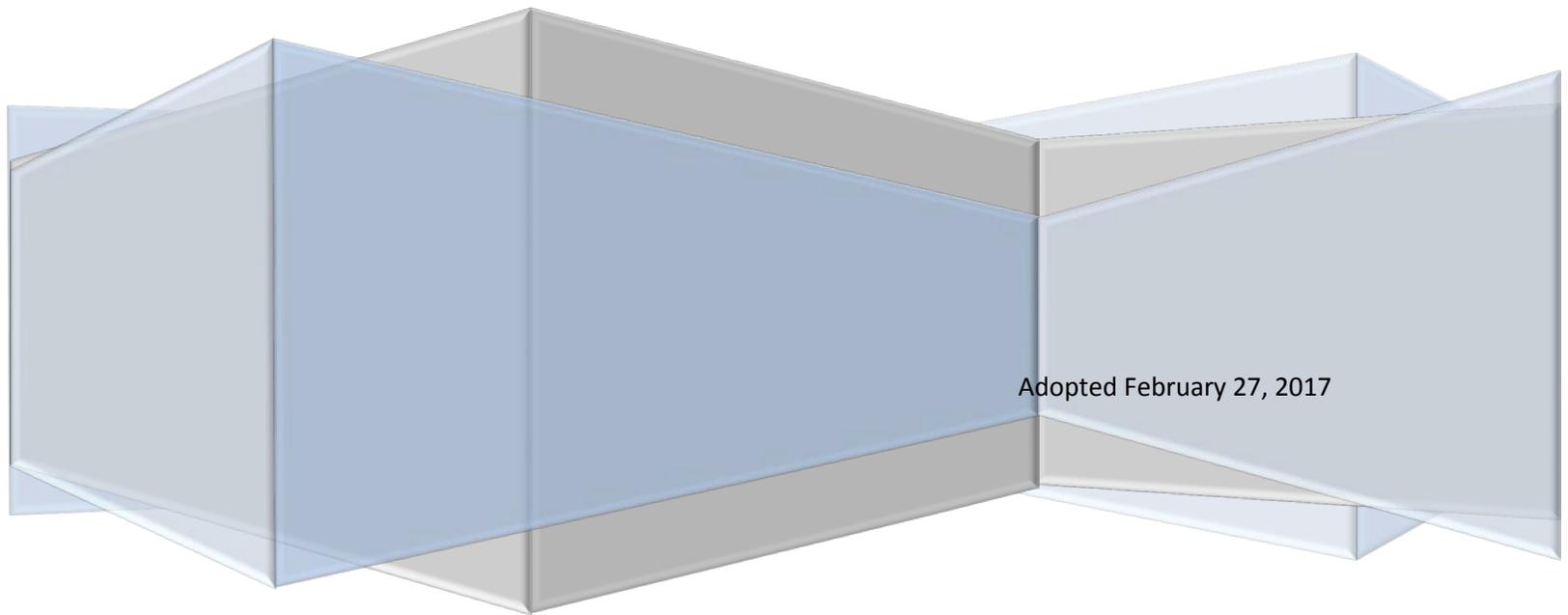


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INTRODUCTION

The purpose of this document is to set forth specific investment policy and strategy guidelines for the City of Shavano Park in order to achieve the objectives of safety, liquidity, diversification, and yield for all investment activity. The City Council of the City of Shavano Park shall review and adopt, by resolution, its investment strategies and policy not less than annually. The resolution shall include a record of changes made to either the investment policy or strategy. This policy serves to satisfy the statutory requirement (specifically the Public Funds Investment Act, "the ACT", Chapter 2256 Texas Government Code) to define, adopt and review a formal investment strategy and policy.

INVESTMENT STRATEGY

The City of Shavano Park maintains portfolios which utilize five specific investment strategy considerations designed to address the unique characteristics of the fund groups represented in the portfolios:

- A. Operating funds and commingled pools containing operating funds have as their primary objective to assure that anticipated cash flows are matched with adequate investment liquidity. The secondary objective is to create a portfolio structure which will experience minimal volatility (i.e. risk) during economic cycles. This may be accomplished by purchasing high-quality, short to medium-term securities which will complement each other in a laddered or barbell maturity structure. The dollar weighted average maturity of 365 days or less will be calculated using the stated final maturity date of each security.
- B. Debt service funds shall have as the primary objective the assurance of investment liquidity adequate to cover the debt service obligation on the required payment date. Securities purchased shall not have a stated final maturity date which exceeds the debt service payment date.
- C. Debt service reserve funds shall have as the primary objective the ability to generate a dependable revenue stream to the appropriate debt service fund from securities with a low degree of volatility. Securities should be of high quality and, except as may be required by the bond ordinance specific to an individual issue, of short to intermediate-term maturities. Volatility shall be further controlled through the purchase of securities carrying the highest coupon available, within the desired maturity and quality range, without paying a premium, if at all possible.
- D. Special projects or special purpose fund portfolios will have as their primary objective to assure that anticipated cash flows are matched with adequate investment liquidity. These portfolios should include at least 10% in highly liquid securities to allow for flexibility and unanticipated project outlays. The stated final maturity dates of securities held should not exceed the estimated, project completion date.

- E. Operating funds reserved fund balance shall have as the primary objective the capability of adding yield to the portfolio without causing any cash flow inadequacies. The City's intent is to maintain a reserve fund balance of four to six months of operating expenditures to ensure that during economic shortfalls funds are available to sustain the City's needs. The weighted average maturity of these securities shall be no more than 2 years and at least 15% of the funds will be liquid.

INVESTMENT POLICY

SCOPE

This investment policy applies to all financial assets of the City of Shavano Park. These funds are accounted for in the City's Comprehensive Annual Financial Report (CAFR) and include:

- General Fund
- Special Revenue Funds
- Debt Service Funds
- Capital Projects Funds
- Proprietary Funds
- All Other Funds

OBJECTIVES

The City of Shavano Park shall manage and invest its cash with four objectives, listed in order of priority: Safety, Liquidity, Diversification, and Yield. The safety of the principal invested always remains the primary objective. All investments shall be designed and managed in a manner responsive to the public trust and consistent with State and Local law.

The City shall maintain a comprehensive cash management program which includes collection of accounts receivable, vendor payment in accordance with invoice terms and prudent investment of available cash. Cash management is defined as the process of managing monies in order to ensure maximum cash availability and maximum yield on short-term investment of pooled idle cash.

Safety

The primary objective of the City's investment activity is the preservation of capital in the overall portfolio. Each investment transaction shall be conducted in a manner to avoid capital losses, whether they are from securities defaults or erosion of market value.

Liquidity

The City's investment portfolio shall be structured such that the City is able to meet all obligations in a timely manner. This shall be achieved by matching investment maturities with forecasted cash flow requirements and by investing in securities with active secondary markets.

Diversification

In order to minimize investment and market risk, the City will diversify its investments by market sector (security type) and maturity. The portfolio will be designed to avoid unreasonable risks within one market sector or from an individual financial institution.

Yield

The City's cash management portfolio shall be designed with the objective of regularly exceeding the average rate of return on U.S. Treasury Bills at a maturity level comparable to the City's weighted average maturity in days. The investment program shall seek to augment returns above this threshold consistent with risk limitations identified herein and prudent investment policies.

RESPONSIBILITY AND CONTROL

Investment Committee

Members

A five member Investment Committee, shall consist of the City Manager, Finance Director and at least one City Council member and two outside committee members as selected by Council.

Scope

The Investment Committee shall meet at least semi-annual or other time frame to determine operational strategies and to monitor results. Include in its deliberation such topics as: performance reports, economic outlook, portfolio, diversification, maturity structure, potential risk to the City's funds, authorized brokers and dealers and the target rate of return on the investment portfolio. The committee may make recommendations to the Investment Officer and the Council.

Procedures

The Investment Committee shall establish its own rules of procedures as it is not required to conform to open meetings act. Meeting summations shall be provided to all members of the investment committee.

Delegation of Authority

Authority to manage the City's investment program is derived from a resolution of the City Council. The Finance Director and City Manager or any person designated by the City Council shall act as Investment Officers for the City and is responsible for investment decisions and activities. The Investments Officer shall establish written procedures for the operation of the investment program, consistent with this investment policy.

Training

The Investment Officers and the other members of the Investment Committee shall attend at least one training session relating to investment responsibilities under the Act within 12 months after assuming duties; a training session not less than once in a two-year period that begins on the first day of the City of Shavano Park's fiscal year and consists of the two consecutive years after that date; each initial training session shall contain not less than 10 hours of training, and subsequent training sessions not less than eight hours of instruction.

Training requirements for "Other" members of the Investment Committee may be waived by City Council for highly qualified professionals as so designated at the time of appointment.

Such training from an independent source shall be approved or endorsed by either, Government Finance Officers Association of Texas, the Government Treasurers Organization of Texas, the Texas Municipal League or the Alamo Area Council of Governments. All expenses incurred for the required training will be paid or reimbursed by the City in accordance with the current travel and training policy in force.

Internal Controls

The Investment Officers are responsible for establishing and maintaining an internal control structure designed to ensure that the assets of the entity are protected from loss, theft or misuse. The internal control structure shall be designed to provide reasonable assurance that these objectives are met. The concept of reasonable assurance recognizes that (1) the cost should not exceed the benefits likely to be derived; and (2) the valuation of costs and benefits requires estimates and judgments by the investment officers.

Accordingly, the Investment Officers shall establish a process for annual independent review by an external qualified entity(s) to assure compliance with policies and procedures. This can be part of the annual audit. The results of this review shall be reported to the City Council. The internal controls shall address the following points:

- A. Control of collusion

- B. Separation of transaction authority from accounting and record keeping.
- C. Custodial safekeeping
- D. Avoidance of physical delivery securities.
- E. Clear delegation of authority to subordinate staff members.
- F. Written confirmation for telephone (voice) transactions for investments and wire transfers.
- G. Development of a wire transfer agreement with the depository bank or third party custodian.

Prudence

The standard of prudence to be applied by the investment officer shall be the "prudent investor" rule, which states: "Investments shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of their capital as well as the probable income to be derived." In determining whether an investment officer has exercised prudence with respect to an investment decision, the determination shall be made taking into consideration:

- A. The investment of all funds under the City's control, over which the officer had responsibility rather than a consideration as to the prudence of a single investment.
- B. Whether the investment decision was consistent with the written investment policy of the City.

The Investment Officers and those delegated investment authority under this Policy, when acting in accordance with the written procedures and in accord with the Prudent Person Rule, shall be relieved of personal liability in the management of the portfolio provided that deviations from expectations for a specific security's credit risk or market price change or portfolio shifts are reported in a timely manner and that appropriate action is taken to control adverse market effects.

Public Trust

All participants in the City's investment process shall seek to act responsibly as custodians of the public trust. Investment officials shall avoid any transaction which might impair public confidence in the City's ability to govern effectively.

Ethics and Conflicts of Interest

The Investment Committee and City staff involved in the investment process shall refrain from personal business activity that could conflict with proper execution of the investment program, or which could impair the ability to make impartial investment decisions. City staff shall disclose to the City Manager any material financial interests in financial institutions that conduct business with the City and they shall further disclose positions that could be related to the performance of the City's portfolio. City staff shall subordinate their personal financial transactions to those of the City, particularly with regard to timing of purchases and sales.

An investment officer of the City who has a personal business relationship with an organization seeking to sell an investment to the City shall file a statement disclosing that personal business interest. An investment officer who is related within second degree by affinity or consanguinity to an individual seeking to sell an investment to the City shall file a statement disclosing that relationship. A statement required under this subsection must be filed with the Texas Ethics Commission and the governing body of the entity.

REPORTING

Quarterly Reporting

The Investment Officer shall submit quarterly reports to the City Council containing sufficient information to permit an informed outside reader to evaluate the performance of the investment program and consistent with statutory requirements. All reports shall be in compliance with the Act. Market prices for market evaluations will be obtained from an independent source.

Annual Report

Within 90 days of the end of the fiscal year, the Investment Officer shall present an annual report on the investment program and investment activity. This report may be presented as a component of the fourth quarter report to the City Council.

Methods

The quarterly investment report shall include a succinct management summary that provides a clear picture of the status of the current investment portfolio and transactions made over the last quarter. This management summary will be prepared in a manner which will allow the City to ascertain whether investment activities during the reporting period have conformed to

the investment policy. The report will be provided to the City Council and will include the following:

- A. A listing of individual securities held at the end of the reporting period. This list will include the name of the fund or pooled group fund for which each individual investment was acquired.
- B. Unrealized gains or losses resulting from appreciation or depreciation by listing the beginning and ending book and market value of securities for the period. Market values shall be obtained from financial institutions or portfolio reporting services independent from the broker/dealer from whom the security was purchased.
- C. Additions and changes to the market value during the period.
- D. Fully accrued interest for the reporting period.
- E. Average weighted yield to maturity of portfolio on entity investments as compared to applicable benchmarks.
- F. Listing of investments by maturity date.
- G. The percentage of the total portfolio which each type of investment represents.
- H. Statement of compliance of the City's investment portfolio with State law and the investment strategy and policy approved by the City Council.

INVESTMENT PORTFOLIO

Active Portfolio Management

The City shall pursue an active versus a passive portfolio management philosophy. That is, securities may be sold before they mature if market conditions present an opportunity for the City to benefit from the trade. The investment officer will routinely monitor the contents of the portfolio, the available markets, and the relative value of competing instruments and will adjust the portfolio accordingly.

Investments

Assets of the City of Shavano Park may be invested in the following instruments; provided, however, that at no time shall assets of the City be invested in any instrument or security not authorized for investment under the Act, as the Act may from time to time be amended. The City is not required to liquidate investments that were authorized investments at the time of purchase.

I. Authorized

- A. Obligations, including letters of credit, of the United States of America, its agencies and instrumentalities which have a liquid market with a readily determinable market value.
- B. Direct obligations of the State of Texas and agencies thereof. Total investment in this instrument shall not exceed 90% of the overall portfolio.
- C. Other obligations, the principle of and interest on which are unconditionally guaranteed or insured by, or backed by the full faith and credit of, the State of Texas or United States of America or their respective agencies and instrumentalities including obligations that are fully guaranteed or insured by the Federal Deposit Insurance Corporation or by the explicit full faith and credit of the United States.
- D. Obligations of the States (other than Texas), agencies thereof, Counties, Cities and other political subdivisions of any state having been rated as to investment quality by a nationally recognized investment rating firm and having received a rating of not less than "A" or its equivalent. Total investment in this instrument shall not exceed 25% of the overall portfolio.
- E. Certificates of Deposit by a Depository Institution that has its main office or branch office in the State of Texas, guaranteed or insured by the Federal Deposit Insurance Corporation or its successor or the National Credit Union Share Insurance Fund or its successor; secured by obligations described in A through D 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 of the nature described by Section 2256.009 (b) of the Texas Government Code and made in accordance with the conditions as specified by Section 2256.010 of the Texas Government Code. Total investment in CD's shall not exceed 80% of the overall portfolio.
- F. Fully collateralized direct repurchase agreements with a defined termination date secured by a combination of cash and obligations of the United States or its agencies and instrumentalities pledged to the City, held in the City's name, and deposited at the time the investment is made with the entity or with a third party, selected by the City. Repurchase agreements must be purchased through a primary government securities dealer, as defined by the Federal Reserve, or a financial institution domiciled in Texas. A Master Repurchase Agreement must be signed by the bank/dealer prior to investment in a repurchase agreement. The term of any reverse security repurchased agreement may not exceed 90 days after the date the reverse security repurchase agreement is delivered. Money received under the terms of a reverse security repurchase agreement shall be used to acquire additional investments, but the term of the authorized investments acquired must mature not later than the expiration date stated in the reverse security repurchase agreement. Total investment in repurchase agreements shall not exceed 10% of the overall portfolio.
- G. Joint pools of political subdivisions in the State of Texas which invest in instruments and follow practices as specified by Section 2256.016 of the Texas Government Code. Investment in such pools shall be limited to 90% of the City's entire portfolio. A pool must be continuously rated no lower than AAA or AAA-m or at an equivalent rating by at least one nationally recognized rating service.

II. Un-Authorized

The City's investment policy specifically prohibits investments in the securities listed below:

- 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 10 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.
- E. Securities Lending Program
- F. Bankers' Acceptance Commercial Paper

Holding Period

The City of Shavano Park intends to match the holding periods of investment funds with liquidity needs of the City. In no case will the average maturity of investments of the City's operating funds exceed one year. The maximum final stated maturity of any investment shall not exceed five years. The maximum weighted average maturity (WAM) of the overall portfolio shall not exceed 270 days.

Investments in all funds shall be managed in such a way that the market price losses resulting from interest rate volatility would be offset by coupon income and current income received from the volume of the portfolio during a twelve-month period.

The Investment Officer will monitor rating changes in investments acquired with public funds that require a minimum rating and shall take all prudent measures that are consistent with its investment policy to liquidate an investment that does not have the minimum rating thereby making that investment an unauthorized investment.

Risk and Diversification

The City of Shavano Park recognizes that investment risks can result from issuer defaults, market priced changes or various technical complications leading to temporary illiquidity. Risk is controlled through portfolio diversification which shall be achieved by the following general guidelines.

- A. Risk of issuer default is controlled by limiting investments to those instruments allowed

by the Act, which are described herein.

- B. Risk of market price changes shall be controlled by avoiding over-concentration of assets in a specific maturity sector, limitation of average maturity of operating funds investments to one year and avoidance of over-concentration of assets in specific instruments other than U.S. Treasury Securities and Insured or Collateralized Certificates of Deposits.
- C. Risk of illiquidity due to technical complications shall be controlled by the selection of securities dealers as described herein.

The Table below summarizes the authorized investments and their maximum allocation as a percentage of the overall investment portfolio:

Security Type	Maximum Allocation
A. Obligations of the US Government, Agencies/Instrumentalities	90%
B. Obligations of the State of Texas, Agencies/Instrumentalities	50%
C. Obligations of other States, County, Cities and political subdivision	25%
D. Certificate of Deposits with branch(s) in the State of Texas (Max. of \$250K per institution, insured or collateralized)	80%
E. Collateralized direct repurchase agreements	10%
F. Constant dollar Investment Pools (Ex. TexPool, TexStar)	90%
G. Money Market Mutual Fund (AAA rated or equivalent)	50%

SELECTION OF BANKS, BROKER/DEALERS, AND INVESTMENT ADVISORS

Depository

City Council shall, by ordinance, “select and designate one or more banking institutions as the depository for the monies and funds of the City” in accordance with the requirement of Tex. Loc. Gov’t Code Ch. 105. At least every five years a Depository shall be selected through the City's banking services procurement process, which shall include a formal request for proposal (RFP). In selecting a depository, the credit worthiness of institutions shall be considered and the Investment Officer shall conduct a comprehensive review of prospective depositories' credit characteristics and financial history.

Certificates of Deposit

Banks seeking to establish eligibility for the City's competitive certificate of deposit purchase program shall submit for review annual financial statements, evidence of federal insurance and other information as required by the Investment Officer.

Investment Advisor

The Council may, at its discretion, contract with an investment management firm properly registered under the Investment Advisors Act of 1940 (15 U.S.C. Section 80b-1 et seq.) and with the Texas State Securities Board to provide for investment and management of its public funds or other funds under its control.

Securities Dealers

All investments made by the City will be made through the City's banking services bank or a primary dealer. The Investment Committee will review the list of authorized broker/dealers annually. A list of at least three broker/dealers will be maintained in order to assure competitive bidding. Brokers and dealers who office in the San Antonio and Austin metropolitan area are preferred. Investment officials shall not knowingly conduct business with any firm with whom public entities have sustained losses on investments. All Securities dealers shall provide the City with references from public entities which they are now serving.

All financial institutions and brokers/dealers who desire to become qualified bidders for investment transactions must supply the following as appropriate:

- audited financial statements each year,
- proof of National Association of Securities Dealers (NASD) certification and provision of CRD number,
- proof of current registration with the State Securities Commission and
- completed broker/dealer questionnaire
- certification of having read the City's investment policy signed by a qualified

representative of the organization

- acknowledgement that the organization has implemented reasonable procedures and controls in an effort to preclude imprudent investment activities arising out of investment transactions conducted between the City and the organization.

Qualified representative means a person who holds a position with a business organization, who is authorized to act on behalf of the business organization and who is one of the following:

- A. For a business organization doing business that is regulated by or registered with a securities commission, a person who is registered under the rules of the National Association of Securities Dealers;
- B. For state or federal bank, a savings bank, or a state or federal credit union, a member of the loan committee for the bank or branch of the bank or a person authorized by corporate resolution to act on behalf of and bind the banking institution; or
- C. For an investment pool, the person authorized by the elected official or board with authority to administer the activities of the investment pool to sign the certification on behalf of the investment pool.

Investment Pools

A thorough investigation of the pool is required prior to investing, and on a continual basis. All investment pools must have available the following information in order to be eligible to receive funds:

- the types of investments in which money is allowed to be invested
- the maximum average dollar-weighted maturity allowed, based on the stated maturity date, of the pool
- the maximum stated maturity date any investment security within the portfolio has
- the objectives of the pool
- the size of the pool
- the names of the members of the advisory board of the pool and the dates their terms expire > the custodian bank that will safe keep the pool's assets
- whether the intent of the pool is to maintain a net asset value of one dollar and the risk of market price fluctuation

- whether the only source of payment is the assets of the pool at market value or whether there is a secondary source of payment, such as insurance or guarantees, and a description of the secondary source of payment
- the name and address of the independent auditor of the pool
- the requirements to be satisfied for an entity to deposit funds in and withdraw funds from the pool and any deadlines or other operating policies required for the entity to invest funds in and withdraw funds from the pool
- the performance history of the pool, including yield, average dollar weighted maturities and expense ratios
- a description of interest calculations and how interest is distributed, and how gains and losses are treated

An annual review of the financial condition of each investment pool(s) will be conducted by the Investment Committee.

SAFEKEEPING AND CUSTODY

Insurance or Collateral

All deposits and investments of City funds other than direct purchase of U.S. Treasuries or Agencies shall be secured by pledged collateral. In order to anticipate market changes and provide a level of security for all funds, the collateralization level will be 102% of market value of principal and accrued interest on the deposits or investments less an amount insured by the FDIC or FSLIC. Evidence of the pledged collateral shall be maintained by the Finance Director or a third party financial institution. Repurchase agreements shall be documented by a specific agreement noting the collateral pledge in each agreement. Collateral shall be reviewed weekly to assure that the market value of the pledged securities is adequate.

Safekeeping Agreement

Collateral pledged to secure deposits of the City shall be held by a safekeeping institution in accordance with a Safekeeping Agreement which clearly defines the procedural steps for gaining access to the collateral should the City of Shavano Park determine that the City's funds are in jeopardy. The safekeeping institution, or Trustee, shall be the Federal Reserve Bank or an institution not affiliated with the firm pledging the collateral. The safekeeping agreement shall include the signatures of authorized representatives of the City of Shavano Park, the firm pledging the collateral, and the Trustee.

Collateral Defined

The City of Shavano Park shall accept only the following securities as collateral:

- A. FDIC and FSLIC insurance coverage
- B. A bond, certificate of indebtedness, or Treasury Note of the United States, or other evidence of indebtedness of the United States that is guaranteed as to principal and interest by the United States.
- C. Obligations, the principal and interest on which, are unconditionally guaranteed or insured by the State of Texas.
- D. A bond of the State of Texas or of a county, city or other political subdivision of the State of Texas having been rated as investment grade (investment rating no less than "AA" or its equivalent) by a nationally recognized rating agency with a remaining maturity of ten (10) years or less.

Subject to Audit

All collateral shall be subject to inspection and audit by the Investment Officer or the City's independent auditors.

Delivery vs. Payment

Treasury Bills, Notes, Bonds, Repurchase Agreements and Government Agencies' securities shall be purchased using the delivery vs. payment method. That is, funds shall not be wired or paid until verification has been made that the correct security was received by the Trustee. The security shall be held in the name of the City or held on behalf of the City. The Trustee's records shall assure the notation of the City's ownership of or explicit claim on the securities. The original copy of all safekeeping receipts shall be delivered to the City.

Competitive Bidding

All investment transactions, including certificates of deposit, will be made on a competitive basis to assure that the City is receiving fair market prices. Bids for certificates of deposits may be solicited orally, in writing, electronically or in any combination of those methods.

INVESTMENT POLICY ADOPTION

The City of Shavano Park Investment Policy shall be adopted by resolution of the City Council. The policy shall be reviewed for effectiveness on an annual basis by the Investment Committee and

any modifications will be recommended for approval to the City Council. The City Council shall review these investment policies and strategies not less than annually.