DELAWARE VALLEY SCHOOL DISTRICT

SECTION: FINANCES

TITLE: INVESTMENT OF

DISTRICT FUNDS

ADOPTED: JUNE 18, 2015

REVISED: MAY 14, 2015

609. INVESTMENT OF DISTRICT FUNDS

1. Purpose

It shall be the policy of the Board to optimize its return through investment of cash balances in such a way as to minimize non-invested balances and to maximize return on investments.

The primary objectives of investment activities, in priority order, shall be:

Legality - All investments shall be made in accordance with applicable laws of Pennsylvania.

Safety - Safety of principal shall be of highest priority. Preservation of capital in the portfolio of investments shall be ensured through the mitigation of credit risk and interest rate risk.

Liquidity - Investments shall remain sufficiently liquid to meet all operating requirements that are reasonably anticipated. A fiscal year operations anticipated cash flow shall be developed so that investments can be made as early as possible, with maturities concurrent with anticipated cash demands.

Yield - Investments shall be made with the objective of attaining a market-average rate of return throughout the budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs.

2. Authority SC 440.1, 621, 622, 623

All investments of the school district made by an officer and/or employee of the district shall be made in accordance with this policy and a Board-approved investment program.

3. Definitions

Short-term - any period thirteen (13) months or less.

Long-term - any period exceeding forty-eight (48) months' duration.

Mid-range - any period between short-term and long-term.

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Concentration of credit risk – the risk associated with the consolidation of investments in a single pool, institution, or instrument.

Credit risk - the risk of loss of principal due to the failure of the security issue or backer of the issue.

Custodial credit risk – the risk of loss associated with consolidation of investments with a single institution where the district may rely on the institution to hold investments on behalf of the district or through collateral action when the instruments are not in the district name.

Foreign currency risk – the risk associated with investment in foreign currency that is subject to market fluctuation and associated currency conversion.

Interest rate risk - the risk that the market value of securities will fall due to changes in general interest rates.

Investment program - the specifically enumerated and Board-approved investment strategy.

4. Delegation of Responsibility SC 440.1 The Board shall delegate to a designated individual the responsibility to manage the district's investment program, in accordance with written, Board-approved procedures for operation of the investment program.

An annual review of the investment program shall be prepared by the designated individual, based upon the anticipated cash flow of all district funds, i.e. general, capital reserve, bond, etc. The investment program shall be submitted to the Board no later than sixty (60) days after adoption of the annual budget.

SC 440.1

The designated individual responsible for investments shall report monthly to the Board the following:

- 1. Amount of funds invested.
- 2. Interest earned and received to date.
- 3. Types and amounts of each investment and the interest rate on each.
- 4. Names of the institutions where investments are placed.
- 5. Current market value of the funds invested.

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	The Board directs the Superintendent to have developed written procedures that will ensure compliance with this policy. Such procedures shall include a disclosure form for designated individuals involved in the investment process and/or required written statements for advisors and bidders.
5. Guidelines SC 440.1	Investments permitted by this policy are those defined in Section 440.1 of the School Code, as amended, which are collateralized in accordance with applicable laws.
	All securities shall be purchased in the name of the school district, and custody of the securities shall be specified within the district's investment program.
17 CFR 270	An exception to purchases in the name of the school district is permitted for the purchase of shares of an investment company that is or conducts business voluntarily in compliance with SEC section 2a7.
SC 440.1	All investment advisors or bidders shall verify in writing that they have received a copy of this policy. Such written statement shall indicate that they have read and understand this policy and all applicable statutes related to school district investments, along with their intent to comply fully with these requirements.
	The district shall require all investment advisors/bidders to submit annually any or all of the following, as appropriate:
	1. Audited financial statements.
	2. Proof of Financial Industry Regulatory Authority (FINRA) certification.
	3. Proof of state registration.
	4. Provide annually the rating from a recognized rating agency.
	Disclosure
65 P.S. 1101 et seq	Designated officers and employees involved in the district's investment process shall disclose any personal business activity that could conflict with the proper execution and management of the investment program or could impair their ability to make impartial decisions.
	Audit
	The Board directs that all investment records be subject to annual audit by the district's independent auditors.
	The audit shall include but not be limited to independent verification of amounts and records of all transactions, as deemed necessary by the independent auditors.

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	It shall be the responsibility of the investment advisor and/or bidder to maintain necessary documents to permit independent audit of the district's investments.
	Bond Proceeds
53 Pa. C.S.A. Sec. 8001 et seq Sec. 8224	Bond proceeds shall be invested in accordance with the Local Government Unit Debt Act and applicable federal and state laws, subject to approval by the solicitor and/or bond counsel and the School Board.
	Investment transactions arising from bond proceeds shall be reported monthly to the Board, in accordance with this policy.
SC Sec. 2-218 GASB Stmt 40	Compliance with Generally Accepted Accounting Principles (GAAP)
	The following is intended to guide district investments as limited by Section 440.1 of the School Code.
	1. District funds shall not be invested in foreign currency and shall have no related risk that would require disclosure pursuant to GASB Statement 40.
	2. District investments shall limit the exposure to loss of principal due to market changes in interest rates. To accomplish this, investments of this nature shall be zero.
SC 440.1	3. District investments in authorized instruments that are not backed by the "full faith and credit" of the federal or state governments shall be limited to those investments specified in the School Code.
	If, after purchase, the rating of any instrument is reduced and no longer in compliance with this policy, the individual responsible for district investments shall advise the board at the earliest opportunity of any changes to the School Code.
	4. For purposes of interest rate disclosure in the annual financial report, the method of determining interest rate risk shall be based on weighted average maturity.
References:	Public Officials and Employee Ethics Act – 65 Pa. C.S.A. Sec. 1101 et seq
	Local Government Unit Debt Act – 53 Pa. C.S.A. Sec. 8001 et seq, 8224
	Investment Companies, Title 17, Code of Federal Regulations – 17 CFR Part 270
	Governmental Accounting Standards Board, Statement No. 40