

INVESTMENT POLICY

INVESTMENT OBJECTIVES

The primary objectives of the College District Investment Policy are the preservation of capital and protection of principal, safety of funds and investments, maintenance of sufficient liquidity, diversification to avoid unreasonable or avoidable risks, and yield.

The College District's portfolio shall be designed and managed in accordance with the following "prudent person" 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 the person's own affairs; not for speculation, but for investment, considering the probable safety of capital as well as the probable income to be derived. This prudent person standard shall apply to the management of all College District funds.

To meet the investment objectives of the College District, the maturity of investments shall be targeted to coincide with the cash flow needs of the College District. The investment portfolio shall be diversified to reduce the risk of loss of investment income from overconcentration of assets in a specific issue, a specific issue size, or a specific class of securities.

Nevertheless, the College District recognizes that in a diversified portfolio, occasional measured losses are inevitable and must be considered within the context of the overall portfolio's investment return. Also, it is intended that investments in all funds shall be managed in such a way that any market price losses resulting from interest rate volatility shall be offset by income received from the balance of the portfolio over a reasonable period of time as determined by the Board.

AUTHORIZED INVESTMENTS

The College District's investment authority is derived from the Public Funds Investment Act. Effective September 1, 1995, College District funds may be invested in the following:

1. Obligations of the United States, its agencies, or instrumentalities, except the following: obligations whose payment represents the coupon payments on the outstanding principal balance of the underlying mortgage-backed security collateral and that pays no principal; obligations whose payment represents the principal stream of cash flow from the underlying mortgage-backed security collateral and that bears no interest; collateralized mortgage obligations that have a stated final maturity date of greater than ten years; and collateralized mortgage obligations with an interest rate that is determined by an index that adjusts opposite to the changes in a market index.
2. Repurchase Agreements and Reverse Repurchase Agreements – College District funds may be invested in fully

collateralized repurchase agreements and reverse repurchase agreements having a defined termination date and secured by any obligation of the United States, its agencies, or its instrumentalities, including certain mortgaged-backed securities of the U.S. The repurchase and reverse repurchase agreement transactions are to be placed only with primary government securities dealers or state or national banks doing business in the state of Texas.

3. Certificates of Deposit – College District funds may be invested in fully collateralized certificates of deposit issued by state or national banks domiciled in the state of Texas or savings and loans domiciled in the state of Texas and guaranteed by the Federal Deposit Insurance Corporation or its successor. The certificates must be styled in the name of the College District. Collateral for the time deposits may be in the form of obligations of the United States, its agencies, or instrumentalities; direct obligations of the state of Texas, its agencies, or instrumentalities; other state and local government bonds or obligations rated not less than “A” or its equivalent; other obligations fully guaranteed, insured by, or backed by the full faith and credit of the state of Texas or the United States, including certain mortgage-backed securities.
4. Money Market Mutual Funds – College District funds may be invested in a no-load money market mutual fund that is regulated by the Securities and Exchange Commission. The money market fund must be rated “AAA” or its equivalent by at least one nationally recognized investment rating firm. The money market fund must also maintain a dollar-weighted average stated maturity of 90 days or fewer, and included in its investment objectives shall be the maintenance of a stable net asset value of \$1.
5. Local Investment Pools – College District funds may be invested in the Texas Local Government Investment Pool (TexPool).
6. Commercial Paper – College District funds may be invested in commercial paper if the commercial paper is rated not less than A-1 or P-1 or an equivalent rating by at least two nationally recognized credit rating agencies; or one nationally recognized credit rating agency when fully secured by an irrevocable letter of credit issued by a bank organized and existing under the laws of the United States or any state.

**AUTHORIZED
DEALERS/BROKERS**

The College District shall maintain a list of primary dealers and brokers authorized to provide investment services. All dealers and brokers who desire to become qualified bidders for investment transactions must supply the following:

1. A completed broker/dealer questionnaire;

2. Proof of registration with the Texas State Securities Board;
3. Proof of National Association of Securities Dealers (NASD) certification;
4. Audited financial statements;
5. Written acknowledgement that the entity has read the College District Investment Policy and has reasonable procedures and controls to preclude imprudent investment activities arising out of investment transactions conducted between the entity and the College District.

The College District shall annually review the financial condition and registration of qualified dealers and brokers.

CONFLICTS OF INTEREST

The College President, dean of business and finance, and the Board must disclose personal business and certain family relationships with any entity seeking to sell investments, and a copy of each such disclosure statement must be filed with the governing body of the investing entity and the Texas Ethics Commission.

SAFEKEEPING AND CUSTODY

To protect against potential fraud and embezzlement, the cash and investments of the District shall be secured through third-party custody and safekeeping procedures as designated by the College District.

PORTFOLIO REPORTS

A monthly management portfolio report shall be prepared by the dean of business and finance relating to investments of the College District. The report shall:

1. Describe in detail the investment position of the entity on the date of the report;
2. Be prepared jointly by all investment offices of the entity;
3. Be signed by the dean of business and finance;
4. Contain a summary statement of each pooled fund group that states the beginning market value for the reporting period; additions and changes to the market value during the period; and ending market value for the period;
5. State the book value and market value of each separately invested asset at the beginning and end of the reporting period by the type of asset and fund type invested;
6. State the maturity date of each separately;
7. State the account, fund, or pooled group fund for which each individual investment was acquired;

8. State the compliance of the investment portfolio as it relates to the investment strategy expressed in the Investment Policy and other relevant provisions of the Investment Policy.

INVESTMENT
TRAINING

Each member of the Board shall attend at least one investment training session or view the state-approved investment training video within twelve months after taking office or assuming duties. The investment officer shall attend at least one investment training session with twelve months of assuming duties.

The training shall include education in investment controls, security risks, strategy risks, market risks, as well as compliance with the Texas Public Funds Investment Act.

INVESTMENT
AUTHORIZATION

The dean of business and finance shall serve as the investment officer of the College District, in consultation with the College President and Board. No officer or employee of the Board may deposit, withdraw, invest, transfer, or otherwise manage local funds without the express written authority of the Board.

REVIEW OF
INVESTMENT POLICY

The Board shall review the Investment Policy and investment strategies not less than annually.

AUTHORIZED
INVESTMENT PRIOR
TO HOUSE BILL 2459
AMENDING THE
TEXAS PUBLIC
FUNDS INVESTMENT
ACT

Authorized investment securities acquired under Chapter 2256, Government Code, before the effective date of House Bill 2459, 74th Legislative Session, that are no longer authorized investment securities under Chapter 2256, Government Code, as amended by House Bill 2459, are not required to be liquidated before the final stated maturity of the investment. However, these investment securities should be liquidated when prudent, as determined by the Board.

INVESTMENT
STRATEGY

All College District funds shall be invested in a manner consistent with the following ranked criteria:

1. Preservation of capital and protection of principal;
2. Safety of funds and investments;
3. Maintenance of sufficient liquidity;
4. Diversification to avoid unreasonable or avoidable risk;
5. Yield.

DIVERSIFICATION
AND SUITABILITY

The portfolio shall be designed with the protection of principal and maintenance of sufficient liquidity as the highest priority of the investment strategy. After consideration of safety and liquidity, the College District portfolio shall be directed toward achieving a competitive rate of return. The risk return relationship shall be maintained and controlled through these investment parameters, operation requirements, and the guiding policies of the Board. Actual

risks shall be minimized by adequate collateralization and delivery versus payment procedures, which shall be utilized at all times.

Market and credit risk shall be minimized by diversification. Diversification by market sector and security types, as well as maturity, shall be used to protect the College District against market and credit risk while aiding liquidity requirements. The portfolio shall be structured to benefit from anticipated market conditions and to achieve a reasonable return.