

## **Investment Policy**

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This Investment Policy applies to the investment activities of all funds of the City of Rock Island, except for the Police Pension Fund and the Fire Pension Fund, which are subject to the order of the Board of Trustees of each respective fund. All financial assets of other funds, including: the General Fund, Special Revenue Funds, Capital Project Funds, Debt Service Funds, Special Assessment Funds, Enterprise Funds, Internal Service Funds, Trust and Agency Funds, and other funds that may be created from time to time, shall be administered in accordance with the provisions of this Policy.

Any monies received for the Police Pension Fund, the Fire Pension Fund, the Centennial Bridge Fund, the Park and Recreation Funds and the Rock Island Public Library Fund will be administered by the written order of the respective Board of Trustees of each fund. In the absence of such orders, monies received and/or securities held by the City of Rock Island on behalf of these funds shall be administered in accordance with the provisions of this Policy.

### **Objectives of investment policy**

The purpose of the Investment Policy of the City of Rock Island is to establish cash management and investment guidelines for City Officials responsible for the stewardship of public funds. Specific objectives include:

Safety of principal is the foremost objective of the Investment Policy of the City of Rock Island. Except for the pension funds, for which short-term market fluctuation are tolerable, each investment transaction shall seek to first ensure that capital losses are avoided, whether they be from securities defaults or erosion of market value. Market Speculation is not appropriate in the investment of funds. Normally a "buy and hold" approach to investment will be used. Investments are intended to be purchased so they will mature when funds are needed.

The City shall diversify its investments to avoid incurring unreasonable risks regarding specific security types and/or individual financial institutions.

The City's investment portfolio shall remain sufficiently liquid to enable the City to meet all operating requirements which may be reasonably anticipated in any City fund. Maturities of investments of all funds shall not exceed five years. The majority of funds would normally be invested with a life less than three years.

The investment portfolio of the City except for the pension funds, shall be designed with the objective of regularly exceeding the average return of three month U.S. Treasury Bills. The investment program shall seek to augment returns above this threshold, consistent with risk limitations identified herein and prudent investment principles.

Assets of the pension funds shall be invested in securities, which over the term of an economic cycle, equal or exceed market-average rates of return for comparable portfolios or categories of assets.

In managing its investment portfolio, City officials shall avoid any transaction that might impair public confidence in the government of the City of Rock Island. Investments shall be made with judgement 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. The standard of prudence to be used by investment officials shall be the "prudent person" and shall be applied in the context of managing the overall portfolio.

## **Responsibility for the investment program**

Except for the Police and Fire Pension Funds, the management responsibility for the investment program of the City of Rock Island is hereby delegated to the Director of Finance, who shall establish written procedures for the operation of the Investment Program consistent with this Policy. Such procedures shall include explicit delegation of authority to persons responsible for investment transactions. No person may engage in an investment transaction except as provided under terms of this Policy and procedures established by the Director of Finance. The Director of Finance shall be responsible for all transactions undertaken, and shall establish a system of controls to regulate the activities of subordinates.

The responsibility for investment activities of the Police and Fire Pension Funds rest with the respective Board of Trustees of each fund.

## **Cash management**

The City's policy regarding cash management is based upon the realization that there is a time-value to money. Temporarily idle cash may be invested for a period of one day to five years depending upon when the money is needed. Accordingly, the Director of Finance shall cause to be prepared written cash management procedures which shall include, but not be limited to, the following:

- Receipts: All monies due the City shall be collected as promptly as possible. Monies that are received shall be deposited in an approved financial institution no later than the next business day after receipt by the City. Amounts that remain uncollected after a reasonable length of time shall be subject to any available legal means of collection.
- Disbursements: Any disbursement to suppliers of goods and/or services or to employees for salaries and wages shall be contingent upon available budgeted funds. Disbursements shall be made in accordance with the City's purchasing policy.
- Cash Forecast: At least annually, a cash forecast shall be prepared using expected revenue sources and items of expenditure to project cash requirements over the fiscal year of the City. The forecast shall be updated from time to time to identify the probable investable balances that will be available.
- Pooling of Cash: Except for cash in certain restricted and special accounts, the City will pool the cash of various funds to maximize investment earnings. Investment income will be allocated to the various funds based upon their respective participation.

One of the objectives of the City's cash management procedures is to comply with The Public Funds Deposit Act of the State of Illinois (30 Illinois Compiled Statutes 225/0.01) (formerly Illinois Revised Statutes Chapter 102-34-1) which mandates prompt investment of funds.

## **Accounting**

The City of Rock Island maintains its accounting records on the basis of fund accounting. Each fund is considered a separate accounting entity. All investment transactions shall be recorded in the various funds in accordance with generally accepted accounting principles as promulgated by the Government Accounting Standards Board. Accounting treatment will include:

Investments will be carried at the lower of cost or market in accordance with generally accepted accounting principles.

Premium or discount will be recorded according to generally accepted accounting principles.

Gains or losses on investments in all funds except the pension funds will be recognized at the time of disposition of the security and recorded according to generally accepted accounting principles.

### **Financial institutions**

It shall be the policy of the City of Rock Island to select financial institutions on the following basis:

Security:	The City will not maintain funds in any financial institution that is not a member of the FDIC system. Furthermore, the City of Rock Island will not maintain funds in any financial institution not willing or capable of posting required collateral for funds in excess of the FDIC or SAIF insurable limits.
Size:	The City of Rock Island will not select as depository, any financial institution in which the City funds on deposit will exceed 50% of the institution's capital stock and surplus.
Location:	The City of Rock Island shall encourage investment in the financial institutions within the City of Rock Island. However, the City may approve qualified depositories regardless of location.
Statement of Condition:	The City of Rock Island will maintain for public and managerial inspection current statement of condition for each financial institution named as depository. If, for any reason, the information furnished is considered by the Finance Director to be insufficient, the City may request additional data. The refusal of any institution to provide such data upon request may serve as sufficient cause for the withdrawal of City funds.
Services and Fees:	Any financial institution selected by the City of Rock Island shall provide normal banking services, including, but not limited to checking accounts, wire transfers, purchase and sale of investment securities and safekeeping services. Fees for banking services shall be determined through a request for proposal (RFP) bid process. Fees for services shall be substantiated by a monthly account analysis.

### **Investment Quotes**

The Finance Director, or an agent acting through written agreement shall receive quotes on all investments exceeding \$100,000. At least three institutions will normally be contacted requesting a quote. If the two higher quotes are identical and one of the tying institutions currently holds the funds being quoted, the Finance Director may award the investment to that institution. It is important that the quote is clearly defined. The percent of interest, actual dollar amount to be paid in interest, and the type of pledging must be clearly stated.

### **Community Reinvestment Act**

Priority for investing local funds may be given to banking institutions which exhibit compliance with the Community Reinvestment Act such as:

1. Assist the city in achieving neighborhood redevelopment objectives.
2. Actively market lending programs in older, lower income neighborhoods.

3. Develop programs which better meet credit needs of specified neighborhoods.
4. Participate in city programs now in place which target the Neighborhood Strategy Area.
5. Assist the city in developing programs which promote reinvestment and revitalization of specified neighborhoods (e.g. - risk lending pool).

### **Investment selection**

The City of Rock Island may invest in any type of security allowed by law as set out in The Public Funds Investment Act of the State of Illinois (*the "Investment Act"*) (30 Illinois Compiled Statutes 235/1 et seq) (formerly Illinois Revised Statutes, Chapter 85-902-2). A summary of allowable securities follows:

- (1) Bonds, notes, certificates of indebtedness, treasury bills, or other securities, which are guaranteed by the full faith and credit of the United States of America.
- (2) Interest-bearing savings accounts, interest-bearing certificates of deposit or interest-bearing time deposits or any other investments constituting direct obligations of any bank as defined by the Illinois Banking Act and only those banks with insurance managed and regulated by the Federal Deposit Insurance Corporation (FDIC).
- (3) Shares or other forms of securities legally issued by savings and loan associations incorporated under laws of the State of Illinois or any other state or under laws of the United States and only in those savings and loan associations insured by SAIF.
- (4) Short-term obligations of corporations (commercial paper) organized in the United States with assets exceeding \$500,000,000 if:
  - (a) such obligations are rated at the time of purchase at the highest classification established by at least two standard rating services and which mature not later than 180 days from the date of purchase,
  - (b) and no more than 10% of City funds are invested in such obligations at any time and
  - (c) such purchases do not exceed 10% of the corporation's outstanding obligations.
- (5) Short-term discount obligations of Federal agencies.
- (6) Illinois Public Treasurer's Investment Pool or other similar investments that are made within the parameters set by the Illinois Investment of Public Funds Act.
- (7) Repurchase agreements which meet the following requirements:
  - (a) The securities, unless registered or inscribed in the name of the City, are purchased through banks or trust companies authorized to do business in the State of Illinois.
  - (b) The Finance Director, after ascertaining which firm will give the most favorable rate of interest, directs the custodial bank to "purchase" specified securities from a designated institution. The "custodial bank" is the bank or trust company, or agency of government, which acts for the City in connection with repurchase agreements involving the investment of funds by the City. The custodial bank may not be the seller of securities to the City. The State Treasurer may act as custodial bank for public agencies executing repurchase agreements. To the extent the State Treasurer acts in this capacity, he is authorized to pass through to the City any charges assessed by the Federal Reserve Bank.

- (c) A custodial bank must be a member bank of the Federal Reserve System or maintain accounts with member banks. All transfers of book-entry securities must be accomplished on a Reserve Bank's computer records through a member bank of the Federal Reserve System. These securities must be credited to the City on the records of the custodial bank and the transaction must be confirmed in writing to the City by the custodial bank.
- (d) Trading partners shall be limited to banks or trust companies authorized to do business in the State of Illinois or to registered primary reporting dealers.
- (e) The security interest must be perfected. In order to perfect the security interest, the City, or its custodian or agent, must take possession of the securities. The seller or a person controlled by the seller cannot qualify as either a custodian or agent. The City obtains a security interest when it or its custodian or its agent receives possession of the securities, either physically or transferred through book entry on the Federal Reserve System. Confirmation in writing must be obtained from the custodian or agent.
- (f) The City enters into a written master repurchase agreement which outlines the basic responsibilities and liabilities of both buyer and seller.
- (g) The City enters into a written contract with the custodial bank which outlines the basic responsibilities and liabilities of the buyer, the seller and the custodial bank.
- (h) Payment for securities shall not be made by the custodial bank until the securities are actually received by the custodial bank.
- (i) The City Treasurer informs the custodial bank in writing of the maturity details of the repurchase agreement.
- (j) The custodial bank must take delivery of and maintain the securities in its custody for the account of the City and confirm the transaction in writing to the City. The Custodial Undertaking shall provide that the custodian takes possession of the securities exclusively for the City; that the securities are free of any claims against the trading partner; and any claims by the custodian are subordinate to the City's claim or right to those securities.
- (k) The obligations purchased by a City may only be sold or presented for redemption or payment by the fiscal agency bank or trust company holding the obligations upon the written instruction of the City.

The City will specifically avoid any purchase of financial forwards or futures, any leveraged investments, lending securities or reverse repurchase agreements.

#### **Diversification and maturities**

In order to reduce the risk of default, the investment portfolio of the City shall not exceed the following diversification limits: No financial institution shall hold more than 20% of the City of Rock Island's investment portfolio, exclusive of U.S. Treasury securities held in safekeeping unless specifically authorized by Council.

Commercial paper shall not exceed 10% of the City's investment portfolio.

Illinois Public Treasurer's Investment Pool shall not exceed 25% of the Investment portfolio. Maturities of investments of the various funds of the City shall be determined to enable the City to have

available sufficient cash for all operating purposes. Investments may be purchased with maturities to match future project or liability requirements. However, any investments purchased with a maturity longer than two years must be supported by written documentation explaining the reason for the purchase and must be specifically pre-authorized by the Finance Director. Notwithstanding, no investment in any fund shall have a maturity longer than five years and must be supported by written documentation explaining the reason for the purchase and must be specifically pre-authorized by the Finance Director.

### **Collateral**

It is the policy of the City of Rock Island to require that funds on deposit with banks and savings and loans in excess of FDIC or SAIF insurance limits be secured by some form of collateral. The City will accept any of the following assets as collateral:

- U.S. Government Securities

- Obligations of Federal Agencies

- Obligations of Federal Instrumentalities

- Obligations of the State of Illinois

- Obligations of the City of Rock Island

The amount of collateral provided will be not less than 110% of the fair market value of the net amount of public funds secured. The ratio of fair market value of collateral to the amount of funds secured will be reviewed quarterly and additional collateral will be requested when the ratio declines below the level required. Pledged collateral will be held by the City of Rock Island or in safekeeping and evidenced by a safekeeping agreement. If collateral is held in safekeeping, it may be held by a third party or by an escrow agent of the pledging institution. Collateral agreements will preclude the release of the pledged assets without an authorized signature from the City of Rock Island. Substitution or exchange of securities held in safekeeping cannot be done without prior approval of the City.

In addition to the above assets as security on deposits, the City will accept irrevocable letters of credit issued by a Federal Home Loan Bank.

### **Internal controls**

The Director of Finance shall establish a system of internal controls, which shall be documented in writing. The internal controls shall be reviewed by an independent certified public accountant in conjunction with the annual examination of the financial statements of the City. The controls shall be designed to prevent 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 City of Rock Island.

One of the required elements of the system of internal controls shall be the timely reconciliation of all City bank accounts. Bank reconciliations shall be performed on monthly basis and shall be completed no later than thirty (30) days after the end of the monthly cycle.

### **Reporting**

The Director of Finance shall submit an investment report as part of the Quarterly Management Report which shall describe the portfolio in terms of investment securities, maturities and cost by investment, and earnings for the current period and year-to-date. The report shall indicate any areas of policy concern and planned revision of investment strategies.

From time-to-time the Director of Finance shall suggest policies and improvements that might be made in the investment program.

### **Conflict**

Officers and employees involved in the investment process shall refrain from personal business activity that could conflict with the proper execution of the investment program, or which could impair their ability to make impartial investment decisions.

### **Indemnification**

The Finance Director and employees of the City acting in accordance with this investment policy and written procedures as have been or may be established and exercising due diligence, shall be relieved of personal liability for an individual security's credit risk or market changes.

The standard of prudence to be used by investment officials of the City of Rock Island shall be the "prudent person" standard which states:

Investments shall be made with judgement 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 possible income to be derived.

The above standard is established as the standard for professional responsibility and shall be applied in the contest of managing the City's overall portfolio.

### **Amendment**

This Policy shall be reviewed from time-to-time, and any changes shall be presented to the City Council for their approval.