

AN ORDINANCE 2008-09-18-0831

APPROVING AN INVESTMENT POLICY FOR THE CITY OF SAN ANTONIO, TEXAS, IN ACCORDANCE WITH THE REQUIREMENT OF THE TEXAS PUBLIC FUNDS INVESTMENT ACT, FOR CITY COUNCIL TO REVIEW AND APPROVE THE CITY'S INVESTMENT POLICY; DESIGNATING CERTAIN EMPLOYEES AS INVESTMENT OFFICERS FOR THE CITY OF SAN ANTONIO; AND PROVIDING AN EFFECTIVE DATE .

* * * * *

WHEREAS, the purpose of the City of San Antonio Investment Policy is to provide a framework for the prudent and efficient investment of City funds, with the objectives of satisfying cash flow requirements, preservation and safety of principal, liquidity and diversification, maximizing yield, and proactive portfolio management; and

WHEREAS, among other things, the Texas Public Funds Investment Act, as amended (the "Act") requires an annual review of the Investment Policy by the City Council, as well as a designation of the City's Investment Officers; and

WHEREAS, the proposed Investment Policy incorporates several changes, all of which were approved by the City's Investment Committee on August 13, 2008; and

WHEREAS, it is now necessary to approve the Investment Policy, as revised; **NOW, THEREFORE**;

BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF SAN ANTONIO:

SECTION 1. The Investment Policy, attached hereto and incorporated herein as **Attachment I**, is hereby approved and adopted for use by the City of San Antonio in investing its funds and funds under its control. The Investment Policy approved by this Ordinance contains the following changes from the Investment Policy approved on September 20, 2007, pursuant to Ordinance No. 2007-09-20-1013: 1) Investment Objectives section and globally throughout the document, the term "rate of return" is replaced with "maximize yield"; 2) Prudence section language is added to limit the liability of Investment Officers for changes in market values; 3) Investment Maturities section eliminates the option of the Director of Finance to approve extending maturities past five (5) years and establishes a maximum investment maturity of five (5) years; 4) Authorized Investments section increases the collateral requirement from 100% to 102% for Securities Lending; and 5) the Investment Strategy section establishes a maximum three (3) year Weighted Average Maturity ("WAM") for all funds.

SECTION 2. The City employees in the following positions are hereby designated as Investment Officers: Director of Finance, Assistant Director of Finance – Financial Services, Tax Assessor/Collector Administrator, and the following individuals from the Division of Financial Management: Financial Management Administrator, Financial Manager, Banking Officer, Debt Officers, and Investment Officers. As Investment Officers, said employees are hereby authorized to invest the City's funds and funds under its control. The authority granted to the employees residing in said designated positions is effective until rescinded by the City or until termination of the person's employment by the City. A successor in office to any of the positions designated shall assume the duties of that position as an Investment Officer. All investments shall be made by said Investment Officers in compliance with all applicable federal, state, and local laws, rules, and regulations, including, but not limited to, the Act, and the City's Investment Policy.

SECTION 3. This ordinance shall take effect on October 1, 2008.

PASSED AND APPROVED this 18th day of September, 2008.



M A Y O R

PHIL HARDBERGER

ATTEST:



City Clerk

APPROVED AS TO FORM:



City Attorney



Request for
**COUNCIL
ACTION**



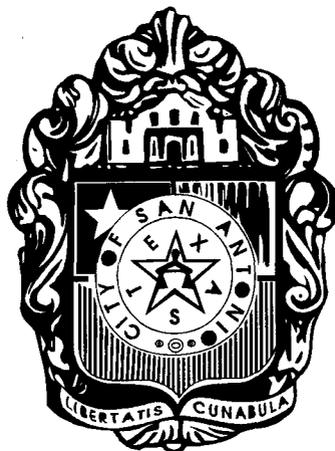
Agenda Voting Results - 37

Name:	35A, 35B, 35C, 37
Date:	09/18/2008
Time:	09:33:42 AM
Vote Type:	Motion to Approve
Description:	An Ordinance approving an Investment Policy for the City of San Antonio, Texas, as required by the Texas Public Funds Investment Act; and designating certain employees as Investment Officers for the City of San Antonio. [Pat DiGiovanni, Deputy City Manager; Ben Gorzell, Director, Finance]
Result:	Passed

Voter	Group	Not Present	Yea	Nay	Abstain	Motion	Second
Phil Hardberger	Mayor		x				
Mary Alice P. Cisneros	District 1		x				
Sheila D. McNeil	District 2		x				
Jennifer V. Ramos	District 3		x				
Philip A. Cortez	District 4		x				
Lourdes Galvan	District 5		x				
Delicia Herrera	District 6		x			x	
Justin Rodriguez	District 7				x		
Diane G. Cibrian	District 8		x				x
Louis E. Rowe	District 9	x					
John G. Clamp	District 10		x				

A T T A C H M E N T I

CITY OF SAN ANTONIO, TEXAS
Department of Finance



Investment Policy

September 30, 2008

CITY OF SAN ANTONIO
Department of Finance
Investment Policy

Table of Contents

	<u>Page</u>
Introduction	1
Investment Committee.....	2
Scope	2
Investment Objectives:	
Satisfy Cash Flow Requirements	2
Preservation and Safety of Principal	3
Liquidity and Diversification	3
Maximize Yield.....	3
Proactive Portfolio Management.....	3
Risk Environment:	
Interest Rate Risk	3
Credit Risk	4
Liquidity Risk.....	4
Authority to Execute Investment Transactions	4
Prudence	5
Investment Maturities.....	5
Training	5
Ethics	6
Internal Controls.....	6
Monitoring Market Activity and Investments	6
Authorized Investments:	
Obligations of, or Guaranteed by Governmental Entities	7
Certificates of Deposit and Share Certificates	7
Repurchase Agreements	8
Securities Lending.....	9
Bankers' Acceptance.....	9
Commercial Paper	10
Mutual Funds.....	10
Guaranteed Investment Contract.....	11
Investment Pools	11
Broker/Dealer, Bank, and Mutual Fund Eligibility.....	13
Utilization of Approved Firms and Periodic Review.....	14
Investment Management Firms	14
Safekeeping and Collateralization.....	15
Investment Strategy	15
Record Keeping and Reporting	17
Closing	18
Glossary.....	Exhibit I

CITY OF SAN ANTONIO, TEXAS

Investment Policy

INTRODUCTION

Fiduciary responsibility for the management and safeguarding of the City of San Antonio's (the "City") monetary assets resides with the City's Department of Finance. In addition to the management of the City's investment assets, the department also has the responsibility to manage the investment assets of various trust and agency funds. The City's investment strategy for all investments is to ensure availability of funds to meet cash flow requirements, safeguard and preserve principal, maintain liquidity, practice security diversification, minimize risk, and maximize yield, all within the context of understanding the suitability of each investment and the cash flow requirements of the City.

The Investment Policy (the "Policy") for the City encompasses a dynamic framework, which, under the direction and approval of City Council, provides the City with the flexibility and control required to execute investment transactions and manage the investment portfolio. The Policy incorporates the investment guidelines and mandates promulgated in the Texas Public Funds Investment Act (the "Act"), as amended. As prescribed by the Act, and as authorized by this Policy pursuant to City Council approval, the City's designated Investment Officers include the Director of Finance, Assistant Director of Finance – Financial Services, Tax Assessor/Collector Administrator, and the following individuals from the Division of Financial Management: Financial Management Administrator, Financial Manager, Banking Officer, Debt Officers and Investment Officers (functional titles of the designated Investment Officers may vary from City of San Antonio Pay Plan titles). Daily investment transactions and management of the City's invested funds are the responsibility of the designated Investment Officers within the Department of Finance, Division of Financial Management.

During the year, periodic review of strategic investment initiatives and management practices shall be undertaken by an Investment Committee. The Investment Committee is comprised of two representatives from the City Council, two representatives from the City Manager's Office, the Director of Finance, Assistant Director of Finance – Financial Services, Tax Assessor/Collector Administrator, Director of the Office of Management and Budget, and the following individuals from the Division of Financial Management: Financial Management Administrator, Financial Manager, Banking Officer, Debt Officers, and Investment Officers.

Investment transactions are executed through approved Broker/Dealers with securities delivered to the Custodian Bank as instructed by the City's Depository Bank. Investment transactions are settled on a delivery versus payment basis with the exception of mutual fund or investment pool investments. Settlement of trades may be done on a same day or subsequent day basis as the Investment Committee and Investment Officers deem most appropriate and advantageous to the City. In addition to the securities acquired through the use of Broker/Dealers, the City may exercise its right to utilize other investment vehicles such as mutual funds and investment pools as authorized and permitted by the Act and this Policy.

For the reader's convenience, a glossary is attached as Exhibit I.

INVESTMENT COMMITTEE

The Investment Committee shall meet at least quarterly to receive a report from the Financial Management Administrator on the most recent quarter's investment activity, cash position of the City, and proposed investment activity for the next succeeding quarter. The Investment Committee shall also review and suggest any changes or adjustments to investment practices.

In addition to the quarterly meetings, Investment Committee members may hold meetings as needed related to the daily investment activity. Any decisions made shall be within the parameters agreed to by the full committee and within the guidelines established in this Policy.

SCOPE

The Policy applies to all funds invested by the City which include the General Fund; Enterprise Funds, to include the Airport System, Parking Facilities, and the Environmental Services Fund; Debt Service Funds created for general obligation indebtedness and revenue bonds; Special Revenue Funds; Capital Project Funds; Internal Service Funds; Fiduciary Funds to include Agency Funds; Expendable Trust Funds, to include the San Antonio Housing Trust Fund, and other funds that may be created.

Investments are pooled into two primary categories, operating funds and debt service funds. Pooled operating funds consist of balances from the City's various funds invested in an aggregate or pooled amount, with principal and interest income distributed to each respective fund on a pro rata basis. Similarly, pooled debt service funds consist of balances applicable to the City's debt service funds invested in an aggregate or pooled amount with principal and interest income distributed to each respective debt service fund on a pro rata basis. In addition, the City may purchase certain investments with the available balance of a specific fund for the sole benefit of such fund. The strategy of pooling investments is subject to change as deemed appropriate by the Investment Committee, and subject to the provisions of this Policy.

Strategic investment practice is focused on meeting daily or short-term cash flow requirements. Long-term investments (investments having maturities in excess of one year) are applicable to balances in construction funds, which may be matched to mature with projected construction draws, and balances held in reserve funds and other such accounts. Investments are typically held to maturity; however, the sale prior to maturity and acquisition of replacement securities may be exercised if financial analysis deems such transactions beneficial to the City, consistent with the investment strategies and objectives established herein. Investment portfolio management practice includes control, flexibility and safety of investments, and may incorporate the utilization of Money Market Mutual Funds, Mutual Funds, and Investment Pools into the investment structure to enhance investment portfolio and cash management efficiencies maintaining safety of principal as its primary objective.

INVESTMENT OBJECTIVES

Satisfy Cash Flow Requirements

The suitability of each investment and the cash flow requirements of the City are incorporated into the daily cash flow position analysis and investments are scheduled to mature on a timely basis to meet the City's on-going cash needs. In addition to the estimated daily routine cash needs, investments are scheduled to mature in connection with payroll dates, construction draw down schedules, debt service payment dates, and other major projected cash requirement dates.

Preservation and Safety of Principal

An essential investment objective is to ensure safety of the corpus or principal amount of every investment, as well as the accrued interest thereon. The City's investment practice is to exercise diligence in the type of securities purchased and the scheduled maturities of such investments to minimize loss of principal due to credit failure or other risk.

Liquidity and Diversification

The investment portfolio shall be structured with diversification and securities that have high credit ratings and are liquid in nature. Fund balances, revenues and expenditure trends shall be studied and monitored to facilitate investment planning in accordance with the cash flow timing, purpose, use, and strategies applicable to the City's various funds.

Maximize Yield

The City will strive to maximize yield on its investments within the aforementioned safety parameters. While investments are made with scheduled maturities to coincide with estimated cash flow needs, opportunities to enhance the portfolio's yield through the sale of securities prior to maturity may be exercised if deemed practical and prudent.

Proactive Portfolio Management

Proactive portfolio management involves review and analysis of the securities in the investment portfolio to take advantage of any sell and buy opportunities that may become available with changes in the market. The purpose of identifying a group of securities for possible sale and the utilization of moneys received from such sale to immediately acquire and replace said securities would be to take advantage of market changes to realize additional profits from such transactions. The sell and buy methodology would involve an analysis of first calculating the possible gain to be made by selling a group of securities and replacing the sold securities with the same or comparable securities.

RISK ENVIRONMENT

The Investment Objectives described above are designed around the concept of preservation and safety of principal. Mitigation techniques are available for the specific risks inherent in securities utilized by the City. A discussion of the more common risks of investing is presented below.

Interest Rate Risk

This is the risk that changes in interest rates will adversely affect the fair value of an investment. Changes in the level of interest rates can influence the market value of certain securities; the severity of that impact depends on the type of security held, and the length of term to maturity. As the general level of interest rates moves up and down, a security's price may change. Volatility is a term used to describe a security's price fluctuations. Securities with long terms to maturity are more volatile than securities with short terms. Securities with call options, or other potential changes to cash flow, are also more sensitive to changes in interest rates than simpler, more traditional structures. By diversifying across issuers and maturity dates, interest rate risk is mitigated, as fewer funds should be subject to a risk occurrence at any given time. In addition, the City generally follows a laddered approach to investing, whereby blocks of roughly the same increments are invested at similarly increased maturity lengths. This

approach provides security that all funds will not fall due at one particularly advantageous or disadvantageous period in time, thereby spreading the interest rate risk.

Credit Risk

This is the risk that an issuer or other counterparty to an investment will not fulfill its obligations. The City's investment strategy is to purchase securities that are of the highest credit quality, based on current ratings provided by nationally recognized credit rating agencies. The majority of the City's funds are invested in U.S. Treasury securities and federal agency securities. These issuers, if guaranteed, are deemed to be without credit risk. Some, but not all federal agency securities are guaranteed, however they continue to carry high credit ratings. Investments in other debt securities will consist of securities rated "A" or better by at least two nationally recognized credit rating agencies. These requirements not only mitigate credit risk, but also mitigate liquidity risk, as the higher rated issues are generally the most liquid. Credit risk may also manifest in the following forms:

- (1) Concentration of Credit Risk – This risk of loss is attributed to the magnitude of investment in a single issuer. Diversification is the primary tool utilized to mitigate this risk. As a matter of policy, investments in issuers other than the U.S. Treasury or federal agency securities must have credit ratings of "A" or better from at least two nationally recognized credit rating agencies. U.S. Treasury and guaranteed federal agency securities are viewed as having the highest possible quality rating.
- (2) Custodial Credit Risk – This is the risk that, in the event of the failure of the counterparty to a transaction, the City would not be able to recover the value of the investment or collateral securities that are in the possession of an outside party. Assets pledged as collateral must generally be a type of security specifically authorized to be held as a direct investment; must be held by an independent third party; and must be pledged in the name of the City. In addition, collateral securities shall have a market value of not less than 102% of the amount of deposits.

Liquidity Risk

This is the risk that a security would not be adequately marketable, and that sale of said security would be unattainable, or attainable at a loss. Liquidity is affected, by many factors, including the amount of an issue outstanding and the term to maturity. Diversification of types and maturities of securities held can help alleviate the liquidity risk. The size of the issue also has an impact. The larger the issue and the higher the credit rating, the more liquid the security. The City maintains a relatively short weighted average maturity (WAM) and invests in high credit securities, which keep liquidity risk low. Additionally, based on periodic cash flow forecasts, an adequate supply of operating funds are maintained in money market funds, which further helps alleviate liquidity risk.

AUTHORITY TO EXECUTE INVESTMENT TRANSACTIONS

Investment transactions shall be executed by the City's designated Investment Officers, which include the Director of Finance, Assistant Director of Finance – Financial Services, Tax Assessor/Collector Administrator, and the following individuals from the Division of Financial Management: Financial Management Administrator, Financial Manager, Banking Officer, Debt Officers, and Investment Officers. Daily investment activity and portfolio management shall be performed by the Department of Finance, Division of Financial Management designated Investment Officers.

PRUDENCE

City of San Antonio investment transactions shall be executed in accordance with 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 safety of their capital as well as the probable income to be derived." In addition, investments shall be made in accordance with the Act and this Policy with the character of the investments given the priority of: (i) preservation and safety of principal, (ii) liquidity and diversification, and (iii) maximum yield.

Investment Officers shall perform their duties in conformance with procedures and policies as set forth in this Policy. Determination as to whether an Investment Officer has exercised prudence in the execution of investment duties shall be made, in part, by taking into consideration the following:

- (1) the investment of all funds, or funds under the City's control, over which an Investment Officer had responsibility rather than a consideration as to the prudence of a single investment; and
- (2) whether the investment decision was consistent with the written Investment Policy of the City.

The Investment Officer, acting in accordance with written procedures and exercising due diligence consistent with the Act, shall not be held personally responsible for a specific security's market price changes, provided that these deviations are reported immediately and that appropriate action is taken to control adverse developments. Failure to act in the manner set forth in the immediately preceding sentence could result in the Investment Officer being held personally responsible in such a situation.

INVESTMENT MATURITIES

Strategic portfolio investments focus on meeting short-term operational and debt service cash flow requirements during the course of a year, and long-term cash flow requirements pertaining to fund balances that are reserved for unexpected decreases in cash positions. Short-term investments to meet operational cash flow requirements are typically invested for less than one year, while balances in funds that are not anticipated to be utilized except in extraordinary circumstances may be invested with two and three year maturities, dependent in part on the yield curve and market conditions. The maximum allowable maturity of an individual investment shall be no more than five (5) years.

TRAINING

In accordance with the Act, the City's designated Investment Officers shall attend at least one training session from an independent source approved by the City Council or by the Investment Committee as provided for in this policy and containing at least ten (10) hours of instruction within twelve (12) months after taking office or assuming duties. This training must include education in investment controls, investment-related risks, portfolio diversification, and compliance with the Act. Thereafter, Investment Officers shall attend an investment training session not less than once in a two-year period and receive not less than ten (10) hours of instruction relating to investment responsibilities under the Act from an independent source approved by the City Council or the Investment Committee as provided for in this policy.

ETHICS

An officer or employee of a commission created under Chapter 391 of the Local Government Code is ineligible to be designated as an Investment Officer under the Act for the City. An Investment Officer who has a personal business relationship with a business organization offering to engage in an investment transaction with the City shall file a statement disclosing that personal business interest. An Investment Officer who is related within the second degree by affinity or consanguinity, as determined under Chapter 573 of the Government Code, to an individual seeking to sell an investment to the City shall file a statement disclosing that relationship. A statement required under the Act must be filed with the Texas Ethics Commission and the City Council. For purposes of this section, an Investment Officer has a "personal business relationship" with a business organization if:

- (1) the Investment Officer owns ten percent (10%) 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 (10%) 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.

INTERNAL CONTROLS

Internal control is exercised through the separation of functions and the reconciliation of investment transaction records created by different parties involved with each transaction. Investment Officers are authorized to execute investment trades but are not authorized to release, transfer, or wire moneys related to investment transactions. Accounting personnel are authorized to effectuate wire transfers and record the transactions. Written records are separately prepared and maintained by the Investment Officers and the Accounting Division. Broker/Dealer trade confirmations and custodial reports are also kept on file.

MONITORING MARKET ACTIVITY AND INVESTMENTS

Market activity is monitored on a continuous basis via financial news wires made available over e-mail and the Internet, as well as live news reports and on-line systems with market quotes. Broker/Dealers provide market information and various financial databases provide historical statistical information. In addition, financial periodicals are perused as an additional information vehicle to broaden financial and market awareness and knowledge. End of month security prices may be obtained from various sources including the City's depository bank, on-line market databases, and Broker/Dealers. This broad-based knowledge is utilized in strategic investment decision making and proactive investment portfolio management.

AUTHORIZED INVESTMENTS

The Texas Public Funds Investment Act authorizes local governments to invest in a prescribed set of investment instruments that can be utilized to promote the goals of safety of principal, liquidity and diversification, and maximum yield. All investments shall be made in compliance with the Texas Public Funds Investment Act as adopted by this Policy (in whole or in part) and any other applicable laws. Through this Policy, the City may elect not to participate in all of the instruments allowed by the Act. Listed below are permitted investment instruments as prescribed by this Policy in accordance with the Texas Public Funds Investment Act.

Obligations of, or Guaranteed by Governmental Entities

Obligations of or Guaranteed by Governmental Entities include, and are limited to, the following:

- (1) obligations, including letters of credit, of the United States or its agencies and instrumentalities;
- (2) direct obligations of the State of Texas or its agencies and instrumentalities;
- (3) 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;
- (4) 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, or the United States, or their respective agencies and instrumentalities; and
- (5) obligations of states, agencies, counties, cities, and other political subdivisions of any state rated as to investment quality by a nationally recognized credit rating agency not less than "A" or its equivalent.

Certificates of Deposit and Share Certificates

A certificate of deposit is an authorized investment if the certificate is issued by a depository institution that has its main office or a branch office in this state and is:

- (1) guaranteed or insured by the Federal Deposit Insurance Corporation or its successor or the National Credit Union Share Insurance Fund or its successor;
- (2) secured by authorized obligations described in "Obligations of, or Guaranteed by, Governmental Entities" 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 securities specifically prohibited by the Texas Public Funds Investment Act, as amended; and
- (3) secured in any other manner and amount provided by law for deposits of the City.

In addition to the authority to invest funds in certificates of deposit as stated above, an investment in certificates of deposit made in accordance with the following conditions is an authorized investment:

- (1) the funds are invested by the City through a depository institution that (a) has its main office or a branch office in the State of Texas; (b) authorized to offer services through Certificates of Deposit Account Registry Service, "CDARS"; and (c) is selected by the City;

- (2) the depository institution selected by the City arranges for the deposit of the funds in certificates of deposit in one or more federally insured depository institutions, wherever located including out of state. Each of the certificates of deposit will be issued for the account of the City as the beneficial owner of the certificates of deposit;
- (3) 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; in effect the Federal Deposit Insurance Corporation (FDIC). Each certificate of deposit will be issued in an amount within the FDIC \$100,000 insurance coverage limit. The total amount of the City's investment will be allocated among a number of financial institutions. The City's investment will thus be fully protected against the failure of any of the institutions issuing the certificates of deposit;
- (4) the depository institution selected by the City acts as custodian for the City with respect to the certificates of deposit issued for the account of the City with respect to the certificates of deposit. Under this provision, when the certificates of deposit issued by other institutions to the City mature, the payment of the principal and accrued interest will be made by those institutions through the selected depository institution in Texas; and
- (5) at the same time that the funds are deposited and the certificates of deposit are issued for the account of the City, the depository institution selected by the City receives an amount of deposits from customers of other federally insured depository institutions, wherever located, that is equal to the amount of the funds invested by the City through the depository institution. The economic effect of investments by the City made in accordance with this procedure will be that the selected depository institution in Texas will have on deposit the amount of funds initially invested by City.
- (6) The amount of funds that may be invested by the City with any one depository institution that meets the requirements set out in (1) through (5) above may not exceed \$10,000,000.

All such collateral must be fully documented, executed with authorizing documentation, and held at an approved third party institution. With respect to certificates of deposit in which the City has invested pursuant to the provisions of (1) through (6) above, the depository institution selected by the City is an approved third party institution.

Repurchase Agreements

A fully collateralized repurchase agreement is an authorized investment if the repurchase agreement:

- (1) has a defined termination date;
- (2) is secured by obligations, including letters of credit, of the United States or its agencies and instrumentalities;
- (3) requires the securities being purchased by the City to be pledged to the City, held in the City's name, and deposited at the time the investment is made with the City or with a third party selected and approved by the City; and
- (4) is placed through a primary government securities dealer, as defined by the Federal Reserve, or a financial institution doing business in the State of Texas.

A "repurchase agreement" is a simultaneous agreement to buy, hold for a specified time, and sell back at a future date, obligations, including letters of credit, of the United States or its agencies and instrumentalities, at a market value at the time the funds are disbursed of not less than the principal

amount of the funds disbursed. A "repurchase agreement" includes a direct security repurchase agreement and a reverse security repurchase agreement.

Notwithstanding any other law, 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 the City 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.

Securities Lending

Securities lending is an authorized investment if:

- (1) the value of securities loaned under the program is not less than 102 percent collateralized, including accrued income;
- (2) a loan made under the program allows for termination at any time;
- (3) a loan made under the program is secured by:
 - (A) pledged securities authorized by the Act, Section 2256.009;
 - (B) 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 credit rating agency at not less than "A" or its equivalent; or
 - (C) cash invested in accordance with the Act;
- (4) the terms of a loan made under the program require that the securities being held as collateral be:
 - (A) pledged to the City;
 - (B) held in the City's name; and
 - (C) deposited at the time the investment is made with the City or with a third party selected by or approved by the City;
- (5) a loan made under the program is placed through:
 - (A) a primary government securities dealer, as defined by 5 C.F.R. Section 6801.102 (f), as that regulation existed on September 1, 2003; or
 - (B) a financial institution doing business in the State of Texas; and
- (6) an agreement to lend securities is executed under this section and has a term of one year or less.

Bankers' Acceptance

A bankers' acceptance is an authorized investment if the bankers' acceptance:

- (1) has a stated maturity of 270 days or fewer from the date of its issuance;
- (2) will be, in accordance with its terms, liquidated in full at maturity;
- (3) is eligible for collateral for borrowing from a Federal Reserve Bank; and
- (4) is accepted by a bank organized and existing under the laws of the United States or any state, if the short-term obligations of the bank, or of a bank holding company of which the bank is

the largest subsidiary, are rated not less than "A-1" or "P-1" or an equivalent rating by at least one nationally recognized credit rating agency.

Commercial Paper

Commercial paper is an authorized investment if the commercial paper:

- (1) has a stated maturity of 270 days or fewer from the date of its issuance; and
- (2) is rated not less than "A-1", "P-1" or an equivalent rating by at least two nationally recognized credit rating agencies, or by one national recognized credit rating agency and is 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.

Mutual Funds

A no-load money market mutual fund is an authorized investment if the mutual fund:

- (1) is registered with and regulated by the Securities and Exchange Commission (SEC);
- (2) provides the City with a prospectus and other information required by the Securities Exchange Act of 1934 or the Investment Company Act of 1940;
- (3) has a dollar-weighted average stated maturity of 90 days or fewer; and
- (4) includes in its investment objectives the maintenance of a stable net asset value of \$1 for each share.

In addition to a no-load money market mutual fund permitted as an authorized investment, a no-load mutual fund is an authorized investment if the mutual fund:

- (1) is registered with the Securities and Exchange Commission;
- (2) has an average weighted maturity of less than two years;
- (3) is invested exclusively in obligations approved by the Act and this Policy;
- (4) is continuously rated as to investment quality by at least one nationally recognized credit rating agency of not less than "AAA" or its equivalent; and
- (5) conforms to the requirements set forth in Sections 2256.016 (b) and (c) of the Act, relating to the eligibility of investment pools to receive and invest funds of investing entities.

Mutual Fund Restrictions:

The City may not:

- (1) invest in the aggregate more than 15 percent of its monthly average fund balance, excluding bond proceeds and reserves and other funds held for debt service, in no-load mutual funds described above;
- (2) invest any portion of bond proceeds, reserves and funds held for debt service, in the authorized no-load mutual funds described above; or

- (3) invest its funds or funds under its control, including bond proceeds and reserves and other funds held for debt service, in any one no-load money market mutual fund or no-load mutual fund described above in an amount that exceeds 10 percent of the total assets of such fund.

Guaranteed Investment Contract

A guaranteed investment contract is an authorized investment for bond proceeds if the guaranteed investment contract:

- (1) has a defined termination date;
- (2) is secured by obligations described by Section 2256.009(a)(1) of the Act, 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; and
- (3) is pledged to the City and deposited with the City or with a third party selected and approved by the City.

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 of longer than five years from the date of issuance of the bonds. To be eligible as an authorized investment:

- (1) the governing body of the City must specifically authorize guaranteed investment contracts as an eligible investment in the order, ordinance, or resolution authorizing the issuance of bonds;
- (2) the City must receive bids from at least three separate providers with no material financial interest in the bonds from which proceeds were received;
- (3) the City must purchase the highest yielding guaranteed investment contract for which a qualifying bid is received;
- (4) the price of the guaranteed investment contract must take into account the reasonably expected drawdown schedule for the bond proceeds to be invested; and
- (5) the provider must certify the administrative costs reasonably expected to be paid to third parties in connection with the guaranteed investment contract.

Investment Pools

The City may invest its funds and funds under its control through an eligible investment pool if the City Council, by ordinance, authorizes investment in the particular pool. The investment pool must only invest in those instruments authorized by the Act and this Policy.

To be eligible to receive funds from and invest funds on behalf of the City, an investment pool must furnish to the City through an Investment Officer or other authorized representative of the City, an offering circular or other similar disclosure instrument that contains, at a minimum, the following information:

- (1) the types of instruments in which the money is allowed to be invested;
- (2) the maximum average dollar-weighted maturity allowed, based on the stated maturity date of the pool;

- (3) the maximum stated maturity date any investment security within the pool;
- (4) the objectives of the pool;
- (5) the size of the pool;
- (6) the names of the members of the advisory board of the pool and the dates their terms expire;
- (7) the custodian bank that will safekeep the pool's assets;
- (8) whether the intent of the pool is to maintain a net asset value of one dollar and the risk of market price fluctuation;
- (9) 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;
- (10) the name and address of the independent auditor of the pool;
- (11) the requirements to be satisfied for the City to deposit funds in and withdraw funds from the pool and any deadlines or other operating policies required for the City to invest funds in and withdraw funds from the pool; and
- (12) the performance history of the pool, including yield, average dollar-weighted maturities, and expense ratios.

In addition, to maintain eligibility to receive funds from and invest funds on behalf of the City, an investment pool must furnish to the City, through an Investment Officer, or other authorized representative of the City:

- (1) investment transaction confirmations; and
- (2) a monthly report that contains, at a minimum, the following information:
 - the types and percentage breakdown of securities in which the pool is invested;
 - the current average dollar-weighted maturity, based on the stated maturity date, of the pool;
 - the current percentage of the pool's portfolio in investments that have stated maturities of more than one year;
 - the book value versus the market value of the pool's portfolio, using amortized cost valuation;
 - the size of the pool;
 - the number of participants in the pool;
 - the custodian bank that is safekeeping the assets of the pool;
 - a listing of daily transaction activity relating to the City's participation in the pool;
 - the yield and expense ratio of the pool;
 - the portfolio managers of the pool; and
 - any changes or addenda to the offering circular.

To be eligible to receive funds from and invest funds on behalf of the City, a public funds investment pool created to function as a money market mutual fund must mark its portfolio to market daily, and, to the extent reasonably possible, stabilize at \$1.00 net asset value. If the ratio of the market value of the portfolio divided by the book value of the portfolio is less than 0.995 or greater than 1.005, portfolio holdings shall be sold as necessary to maintain the ratio between 0.995 and 1.005.

To be eligible to receive funds from and invest funds on behalf of the City, a public funds investment pool must have an advisory board composed:

- (1) equally of participants in the pool and other persons who do not have a business relationship with the pool and are qualified to advise the pool, for a public funds investment pool created under Chapter 791 of the Texas Government Code and managed by a state agency; or
- (2) of participants in the pool and other persons who do not have a business relationship with the pool and are qualified to advise the pool, for other investment pools.

To maintain eligibility to receive funds from and invest funds on behalf of the City, an investment pool must be continuously rated no lower than "AAA" or "AAA-m" or at an equivalent rating by at least one nationally recognized credit rating agency.

A public funds investment pool must be continuously rated no lower than "AAA" or "AAA-m" or at an equivalent rating by at least one nationally recognized credit rating agency or no lower than investment grade by at least one nationally recognized credit rating agency with a weighted average maturity no greater than 90 days.

BROKER/DEALER, BANK, AND MUTUAL FUND ELIGIBILITY

Broker/Dealer, Bank, and Mutual Fund firms interested in providing investment services to the City will be required to submit a Statement of Qualifications in response to the City's Request for Qualifications (RFQ) to provide Broker/Dealer Services. The RFQ may include but not be limited to, inquiries such as the name, address and brief history of the firm, identification of the individuals who will be working with the City, capital structure of the firm, description of major changes that have recently occurred in the firm, disclosure of investigations for alleged improper, fraudulent, disreputable or unfair investment activities, financial reports, and disclosure of any filing or claim the firm may have had or currently has against the City of San Antonio. Firms shall also be evaluated based on fixed income experience, volume, capitalization, integrity, local presence, Small Business Economic Development Advocacy goals, professionalism, product knowledge, and history of alleged or convicted securities violations and/or settlements. In addition to the aforementioned inquiries, Mutual Fund firms will be required to provide a prospectus for each of the funds in which the City may invest. The Statement of Qualifications submitted will be periodically reviewed by the City's Investment Committee which will assess whether a Broker/Dealer, Bank, or Mutual Fund firm is approved to provide investment services to the City. In addition to submission of a Statement of Qualifications, prospective firms must execute a Broker/Dealer, Bank, Mutual Fund, or Investment Pool Certification, as well as complete and sign a Discretionary Contracts Disclosure Form required by the City's Ethics Code. The Broker/Dealer, Bank, Mutual Fund, or Investment Pool Certification will serve as the written instrument whereby such firm acknowledges that, among other things: (1) such firm has received and reviewed the City's Investment Policy; and (2) has implemented reasonable procedures and controls in an effort to preclude investment transactions conducted between the City and the firm that are not authorized by the City's Investment Policy, except to the extent that this authorization is dependent on an analysis of the makeup of the City's entire portfolio or requires an interpretation of subjective investment standards. Nothing in the Act relieves the City of the responsibility for monitoring the investments made by the City to determine that they are in compliance with the City's Investment Policy.

Firms shall be advised that it is the policy of the City to involve qualified small business and local business enterprises to the extent feasible in the City's professional services and other discretionary contracts. Pursuant to Ordinance 96754, the City of San Antonio, its employees, contractors, and subcontractors shall not discriminate on the basis of race, color, religion, national origin, sex, age, or

handicap in the award and performance of contracts or professional services. Firms are encouraged to contact the Economic Development Department for pertinent information regarding the City's Small Business Economic Development Advocacy (SBEDA) Policy Requirements. Firms offering to engage in the City's investment transactions must submit a completed City SBEDA Form 117C, pertaining to a Good Faith Effort Plan regarding Small, Minority and Women Owned Business, and any other relevant documentation of employment practices and policies.

Utilization of Approved Firms and Periodic Review

The City will maintain a list of approved Broker/Dealers based on the aforementioned criteria established in the City's RFQ. Investment Officers will administer investments with the goal of providing and distributing opportunities to the various eligible firms. In that regard, whenever possible, the City will obtain at least three quotes on open-market investment purchases, and such quotes will be obtained from eligible firms on a rotating basis. The Investment Committee shall review, revise, and adopt, at least once per year, the list of approved Broker/Dealers, Banks, and Mutual Fund firms with whom the City does business. A firm may be removed from eligible status, without notice, at the City's sole discretion.

INVESTMENT MANAGEMENT FIRMS

The City 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. The City does not currently utilize an investment management firm for the investment or management of its funds. However, the City may utilize an investment management firm for the investment and management of certain funds if deemed beneficial by the Investment Committee and would be subject to the approval of City Council. A contract made with an investment management firm may not be for a term longer than two years and a renewal or extension of the contract must be approved by the City Council through ordinance.

If the City has contracted with an investment management firm to invest its funds, the investment officer of the investment management firm is considered to be an Investment Officer of the City. Authority granted to a fiduciary to invest City funds is effective until rescinded by the City or until the expiration of the contract with the investment management firm. In the administration of the duties of an Investment Officer, the fiduciary 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 City Council will retain ultimate responsibility as fiduciaries of the assets of the City.

A written copy of the City's Investment Policy shall be presented to an investment management firm that the City contracts with to invest or manage the City's investment portfolio. A qualified representative of the investment management firm shall execute a written instrument in a form acceptable to the City that demonstrates that the firm has:

- (1) received and reviewed the Investment Policy of the City; and
- (2) acknowledged that the investment management firm has implemented reasonable procedures and controls in an effort to preclude investment transactions conducted between the City and the organization that are not authorized by the City's Investment Policy, except to the extent that this authorization is dependent on an analysis of the makeup of the City's entire portfolio or requires an interpretation of subjective investment standards.

SAFEKEEPING AND COLLATERALIZATION

The City's collateral requirements, safekeeping arrangements, and payment for securities are accomplished in accordance with the Public Funds Collateral Act and Texas Public Funds Investment Act, as amended. The City's cash deposits shall be fully secured by a combination of FDIC Insurance coverage or other Federal Insurance and market value of eligible securities as provided for in the Public Funds Collateral Act. Collateral securities shall have a market value of not less than 102% of the amount of deposits. Collateral deposits must be pledged to the City and placed in the custody of a third-party institution that customarily provides such custodial services.

Custodial services arranged through the City's depository bank provide for the safekeeping of securities in the City's investment portfolio. Payment of all securities transactions, except mutual funds and investment pools, shall occur on the settlement date on a delivery versus payment basis.

INVESTMENT STRATEGY

The City administers funds which are derived from a variety of sources, and which are utilized for various purposes. Short-term investments, that is investments with maturities of one year or less, make up the predominate amount of the investment portfolio and are utilized to meet operational, debt service and capital project funding needs. Long-term investments are applicable to balances that are not anticipated to be drawn on and are maintained in a reserve position to preserve the financial integrity of the City's financial resources and would be utilized if unexpected cash draws were required. The maximum weighted average maturity (WAM) applicable to all City funds will be no more than three (3) years.

Investments may be pooled or invested for the benefit of one or more funds. If pooled, principal and interest income is distributed to each respective fund on a pro rata basis. Whether investments are pooled or invested separately is decided by the Investment Committee, based upon which method is most beneficial to the City and on the investment strategies established herein. For all City investments, daily and other periodic cash flow analysis shall be performed to facilitate the investing process. The City's fund groups and their general investing strategies based on their various specific purposes are as follows:

General Fund - Investments pertaining to the General Fund are structured primarily to meet the various operating expenses of the City including payroll and other costs of daily operations. Accordingly, these instruments are structured to be safe, liquid, and short-term in nature, with maturities generally no greater than one year. In addition, investments pertaining to the General Fund will consist of a diversified group of approved instruments intended to maximize yield, and to possess adequate marketability so as not to result in materially adverse impacts should unexpected liquidity needs arise. Available funds deemed not to be required for short-term operational needs may be invested using a laddered structure between one and five years.

Enterprise Funds - Investments pertaining to Enterprise Funds are structured to meet the various operating, debt service, and capital project obligations related to the City's Airport System, Parking Facilities, Environmental Services Fund, and the creation of any other future enterprise funds. Accordingly, liquidity and maturity terms of investments pertaining to Enterprise Funds are based on projections and information related to their various expenditure outlooks and requirements. Investments pertaining to the Enterprise Funds will consist of a diversified group of safe and approved instruments intended to maximize yield, and to possess adequate marketability so as not to result in materially adverse impacts should liquidation become necessary.

Airport System Funds - Available balances in the Airport System Funds exclusive of the construction funds will be laddered over the next five years. The available balances in the Airport construction funds will be invested to match maturities with draw requirements as provided by the Department of Aviation.

Parking Facilities Funds - Available balances in the Parking Facilities Funds will be invested to the end of the current fiscal year and revenue receipts will be invested to cover short-term operational needs.

Environmental Services Fund - Available balances in the Environmental Services Fund will be invested to the end of the current fiscal year and revenue receipts will be invested to cover short-term operational needs.

Debt Service Funds - Investments pertaining to the Debt Service Funds are structured to mature in conjunction with City debt requirements, and to ensure compliance with any pertinent covenants and legal requirements contained in related bond ordinances. In addition, investments pertaining to the Debt Service Funds will consist of a diversified group of safe and approved instruments intended to maximize yield, and to possess adequate marketability so as not to result in materially adverse impacts should liquidation become necessary. Due to definitive debt service schedules, the nature of these funds allows for precise forecasting of required cash flows.

Special Revenue Funds - Investments pertaining to Special Revenue Funds are structured to meet the various specific and restricted expenditure purposes. Generally, the Special Revenue Funds involve frequent activity and require related investment instruments to be liquid and short-term in nature, with maturities generally no greater than one year. In addition, investments pertaining to the Special Revenue Funds will consist of a diversified group of safe and approved instruments intended to maximize yield, and to possess adequate marketability so as not to result in materially adverse impacts should unexpected liquidity needs arise.

HUD 108 Loan Repayment Program (1998) - HUD 108 Loan Repayment Program Funds are invested in direct obligations of the U.S. Treasury, in order to cover interest and principal expenses on the semi-annual debt service requirements.

HUD 108 Guaranteed Loan Program (2006) - HUD 108 Guaranteed Loan Program Funds are invested in liquid, short-term direct obligations of the U.S. Treasury in order to meet monthly draw requirements.

HUD 108 Guaranteed Loan Repayment Program (2006) - HUD 108 Guaranteed Loan Repayment Program Funds are invested in direct obligations of the U.S. Treasury, in order to cover interest and principal expenses on the semi-annual debt service requirements of the HUD 108 Guaranteed Loan Program.

Special Public Improvement District Fund - Any available balance in this fund will be invested in liquid securities to cover expenditures as they arise.

Capital Projects Funds - Investments pertaining to Capital Projects Funds are structured to meet the City's various capital projects obligations. Accordingly, maturity terms of investments pertaining to Capital Project Funds are based on projections and information related to capital project expenditures, with maturity terms timed to meet draw schedule requirements, and not to exceed the expected completion date of the related capital project. Investments pertaining to the Capital Projects Funds will

consist of a diversified group of safe and approved instruments intended to maximize yield, and to possess adequate marketability so as not to result in materially adverse impacts should liquidation become necessary.

Internal Service Funds - Investments pertaining to Internal Service Funds are structured to satisfy the expenditures incurred in providing goods or services between City departments. The Internal Service Funds involve various activity patterns, and require related investment instruments to include various maturity horizons. In addition, investments pertaining to Internal Service Funds will consist of a diversified group of safe and approved instruments intended to maximize yield, and to possess adequate marketability so as not to result in materially adverse impacts should liquidation become necessary

Fiduciary Funds - Investments pertaining to Fiduciary Funds are structured by the City to satisfy various maturity requirements, based on their specific intended purposes. Fiduciary Funds may involve frequent or infrequent activity, thereby resulting in varying liquidity and maturity requirements. Investments pertaining to the Fiduciary Funds will consist of a diversified group of safe and approved instruments intended to maximize yield, and to possess adequate marketability so as not to result in materially adverse impacts should liquidation become necessary.

Agency Funds - Available balances in the Agency Funds will be invested in securities with maturities within two years. Any revenue receipts will be invested in short-term instruments to the end of the current fiscal year.

Expendable Trust Funds - Available balances in the Expendable Trust Funds will be invested in securities with maturities within two years. Any revenue receipts will be invested in short-term instruments to the end of the current fiscal year.

San Antonio Housing Trust Fund - The available balance in this fund will be invested in accordance with draw requirements provided by the San Antonio Housing Trust.

RECORD KEEPING AND REPORTING

Not less than quarterly, the Investment Officers shall prepare and submit to the City Council and the City Manager, a written report of investment transactions of all funds covered by this Policy and the Texas Public Funds Investment Act, for the preceding reporting period within a reasonable time after the end of the period. The report must:

- (1) describe in detail the investment position of the City on the date of the report;
- (2) be prepared and signed jointly by each Investment Officer;
- (3) contain a summary statement, prepared in compliance with generally accepted accounting principles, 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, ending market value for the period, and fully accrued interest for the reporting period;
- (4) 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;
- (5) state the maturity date of each separately invested asset that has a maturity date;
- (6) state the account or fund or pooled group fund of the City for which each individual investment was acquired; and

- (7) state the compliance of the investment portfolio of the City as it relates to the investment strategy expressed in the City's Investment Policy and relevant provisions of the Texas Public Funds Investment Act.

Reports prepared by the Investment Officers for investments transacted other than money market mutual funds, investment pools or accounts offered by the depository bank in the form of certificates of deposit, shall be formally reviewed at least annually by the City's independent auditors, and the result of the review shall be reported to the City Council.

CLOSING

This policy has been developed by the City's Department of Finance, reviewed by the City Attorney's Office, and approved by the City Manager. The Investment Policy is formally adopted by the City Council through Ordinance. The City's Investment Officers will review this policy periodically in accordance with the Act, to evaluate its effectiveness in meeting the City's public funds investment objectives as stated herein, and in the course of their review revise and update the list of qualified Broker/Dealers, Banks, and Mutual Funds with whom the City executes investment transactions. City Council shall review the Investment Policy and investment strategies annually and shall approve and adopt an ordinance, which states that the City Council has reviewed the Investment Policy and investment strategies. Such ordinance so adopted shall record any changes made to either the Investment Policy or investment strategies.

Exhibit I

CITY OF SAN ANTONIO Investment Policy Glossary

DEFINITIONS

The following terms as used in this Policy and in the City's investment portfolio practice shall have the meanings as ascribed below. All definitions provided may not be utilized in this Policy or Investment Reports but are included for informational purposes.

Arbitrage/Rebate Regulations

Arbitrage may arise when tax-exempt municipal bond proceeds are invested at higher yields than the yields on the related bonds. In such cases, interest earnings on the arbitrage bonds may be subject to Internal Revenue Service arbitrage/rebate provisions. The City of San Antonio may from time to time incur arbitrage/rebate liability under these provisions. The City's Finance Department will be responsible for appropriate tracking and maintenance of records to facilitate compliance with requirements of the arbitrage/rebate provisions.

Accrued Interest

Accrued Interest represents the interest on fixed rate securities calculated for the period commencing with the last interest payment date to the settlement date.

Agency Discount Notes

Agency Discount Notes are debt instruments issued by agencies of the United States government with stated maturities not to exceed one (1) year. Agency discount notes are priced at a discount rate based on current market yields. They are not direct obligations of the United States government but are secured by financial arrangements established by each of the applicable issuing agencies.

Airport Construction Fund

The Airport Construction Fund is utilized to make payment on Airport capital improvement construction costs as presented for payment.

Average Life of Portfolio

The Average Life of the Portfolio is the weighted average period of time required to mature all investments in the portfolio.

Bankers' Acceptance (BA)

A Bankers' Acceptance is a negotiable debt instrument primarily utilized to facilitate import/export operations. The note is created by a bank at an agreed upon rate and a stated maturity of less than one (1) year. The Bankers' Acceptance is secured by the creditworthiness of the bank.

Bond Equivalent Yield

The Bond Equivalent Yield is that rate of return on a security sold on a discount basis that assumes actual days to maturity and a 365 day year.

Book Value

Book Value is the original acquisition cost of an investment plus or minus the amortization or accretion of the premium or discount.

Certificates of Deposit (CD)

Certificates of Deposit are debt instruments issued by commercial banks and savings and loan associations which have a stated interest rate and a maturity not less than 7 days. The Certificate of Deposit is insured up to \$100,000 by FDIC and secured by collateral of permitted investments as defined in the Texas Public Funds Investment Act deposited with the custodian bank for the amount of investment in excess of \$100,000.

Collateralized Mortgage Obligations (CMO's)

Collateralized Mortgage Obligations are bonds secured by a pool of mortgages in which the principal cash flows of the pool are separated into two or more series of bonds or tranches that represent short, medium and long-term investments.

Commercial Paper

Obligations issued by banks, corporations, and other financial institutions at interest rates and maturities designed to accommodate the investor's portfolio. Commercial Paper is typically discounted at market yield but may also be interest bearing. Commercial Paper obligations have scheduled maturities that do not exceed 270 days. The security for the Commercial Paper is the creditworthiness of the issuing institution.

Convention Center Expansion Construction Fund

The Convention Center Expansion Construction Fund is utilized to make payment on Convention Center capital improvement construction costs as presented for payment.

Convention Center Expansion Debt Service Fund

The Convention Center Expansion Debt Service Fund is utilized to account for revenues deposited into the fund to pay principal and interest on the outstanding bonds.

Convention Center Expansion Debt Service Reserve Fund

The Convention Center Expansion Debt Service Reserve Fund was created with the issuance of the Series 1996 Convention Center Bonds, and is pledged to the payment of debt service.

Cost

Cost is the price of a security based on market yield exclusive of accrued interest.

Coupon

Coupon represents a stated fixed rate of interest payable at periodic installments, typically every six months.

CUSIP (Committee on Uniformed Securities Investment Procedures)

CUSIP is the standard alphanumeric system used throughout the financial community for identification of security issues.

Discount

Discount represents the difference between the cost of a security priced at less than par or face value and the par or face value of the security and occurs when the yield is greater than the stated rate.

Discount Rate

Discount Rate is used to determine the price of a discount note given market yield.

Federal Agricultural Mortgage Corporation (FRMC)

Farm Credit System banks, commercial banks, thrifts, insurance companies, and other qualified originators of agricultural real estate loans sell their loans to certified loan poolers. These pooled loans are securitized into notes and bonds with fixed interest rates and stated maturities and discount notes that mature within one (1) year at a price based on current market yield and pays the par or face value at maturity. The securities are not direct obligations of the United States government. They are secured by a cash reserve and a \$1.5 billion line of credit to the U.S. Treasury. The Federal Agricultural Mortgage Corporation facilitates the development of a secondary market for farm mortgage loans.

Federal Farm Credit Bank (FFCB)

The Federal Farm Credit Bank issues notes and bonds with fixed interest rates and stated maturities. It also issues discount notes that mature within one (1) year at a price based on current market yield and pays the par or face value at maturity. The securities are not direct obligations of the United States government. Notes, discount notes, and bonds are secured by joint and several obligations of the banks of the Farm Credit System. They are secured by collateral consisting of notes or other obligations of borrowers, obligations of the United States government or any agency thereof, other readily marketable securities approved by the Farm Credit Administration, or cash, in an aggregate value equal to the bonds outstanding. The Federal Farm Credit Bank funds are utilized to provide agricultural loans to farmers and to agricultural associations within the system.

Federal Home Loan Bank (FHLB)

The Federal Home Loan Bank issues notes and bonds with fixed interest rates and stated maturities. It also issues discount notes that mature within one (1) year at a price based on current market yield and pays the par or face value at maturity. The securities are backed by collateral of guaranteed mortgages, cash, government securities, or secured advances to savings and loan associations. They are not direct obligations of the United States government though a credit line with the United States Treasury is in place. The Federal Home Loan Bank funds are utilized to provide money to thrift institutions that in turn originate home loan mortgages.

Federal Home Loan Mortgage Corporation (FHLMC)

The Federal Home Loan Mortgage Corporation issues notes and bonds with fixed interest rates and stated maturities. It also issues discount notes that mature within one (1) year at a price based on current market yield and pays the par or face value at maturity. The securities are unsecured general obligations of the Federal Home Loan Mortgage Corporation and are not direct obligations of the United States government. The Federal Home Loan Mortgage Corporation funds are utilized to purchase mortgages from individual lenders for sale to the secondary market.

Federal National Mortgage Association (FNMA)

The Federal National Mortgage Association issues notes and bonds with fixed interest rates and stated maturities. It also issues discount notes that mature within one (1) year at a price based on current market yield and pays the par or face value at maturity. The securities are unsecured general obligations of the Federal National Mortgage Association and are not direct obligations of the United States government. The Federal National Mortgage Association funds are utilized to purchase mortgages from individual lenders for sale to the secondary market.

HUD 108 Loan Repayment Funds

On June 8, 1998, the City of San Antonio entered into a contract for loan guarantee assistance with the Secretary of Housing and Urban Development. Under the terms of the agreement, the City borrows funds from HUD and in turn loans them to the Greater Kelly Development Corporation for the purpose of capital improvements for Kelly Air Force Base. The HUD 108 Loan Repayment Funds are used for debt service on the loans from HUD.

HUD 108 Guaranteed Loan Funds

On June 12, 2006, the City entered into a contract for loan guarantee assistance with Housing and Urban Development for City Capital Improvement Program Projects.

HUD 108 Guaranteed Loan Repayment Funds

On June 12, 2006, the City entered into a contract for loan guarantee assistance with Housing and Urban Development for City Capital Improvement Program Projects. The HUD 108 Guaranteed Loan Repayment Funds are used to pay debt service on the loans from the HUD 108 Guaranteed Loan

Investment Pool

An Investment Pool is an entity created to invest public funds jointly on behalf of the entities that participate in the pool and whose investment objectives in order of priority are preservation and safety of principal, liquidity and yield.

Market Value

Market Value is the current face or par value of an investment multiplied by the selling price of the security as quoted by a recognized market-pricing source on the valuation date.

Maturity Date

Maturity Date is the date in which the principal or stated value of a debt security becomes due and payable.

Money Market Mutual Funds

A Money Market Mutual Fund is an investment vehicle authorized under the Texas Public Funds Investment Act, as amended, which pools money contributed from many investors and allows the fund to act as a large single investor. The Act requires that such fund be a no-load money market mutual fund, be regulated by the Securities and Exchange Commission, have a dollar weighted average stated maturity of 90 days or fewer, and include in its investment objectives the maintenance of a stable net asset value of \$1 for each share.

Mutual Fund

A Mutual Fund is an investment vehicle authorized under the Texas Public Funds Investment Act, as amended, which pools money contributed from many investors and allows the fund to act as a large single investor. The Act requires that such fund be a no-load mutual fund, be registered with the Securities and Exchange Commission, have an average weighted maturity of less than two years, be invested exclusively in permitted investments as defined in the Act and be continuously rated by at least one nationally recognized credit rating agency of not less than "AAA" or its equivalent.

Par/Maturity Value

Par/Maturity Value is the value assigned a security at 100% of its principal or principal plus interest paid at maturity.

Premium

Premium represents the difference between the cost of a security priced at greater than par or face value and the par or face value of the security and occurs when the yield is less than the stated rate.

Price

Price is the dollar value of a security based on a computation of market yield versus stated interest rate.

Pooled Operating Funds

Pooled Operating Funds consist of balances from the City's various funds, exclusive of the debt service funds, invested in an aggregate or pooled amount with principal and interest income distributed to each respective fund on a pro rata basis.

Pooled Debt Service Funds

Pooled Debt Service Funds consist of balances from the City's Debt Service Funds invested in an aggregate or pooled amount with principal and interest income distributed to each respective fund on a pro rata basis.

Repurchase Agreement (Repo)

A Repurchase Agreement is a debt instrument acquired by an investor with a stated yield and maturity date and a promise by the seller of the debt instrument to repurchase all or a portion of the Repo plus interest upon demand. The Repurchase Agreement is secured with collateral consisting of securities listed as permitted investments as defined in the Texas Public Funds Investment Act and delivered to a custodial bank.

San Antonio Housing Trust Fund

The San Antonio Housing Trust Fund is utilized to account for programs administered by the San Antonio Housing Trust Foundation.

Securities Lending

An investment vehicle where a qualified investor lends securities from their portfolio to another qualified investor to earn enhanced returns on the lent securities through finance charges. The loan is often collateralized and the original securities are returned as repayment at the loan's expiration date.

Settlement Date

Settlement Date is the date in which the security is delivered and payment for the security is made.

Tennessee Valley Authority (TVA)

The Tennessee Valley Authority issues notes and bonds with fixed interest rates and stated maturities. The securities are backed by a first charge upon net power proceeds (net income before interest and non-cash expenses including depreciation). They are not direct obligations of the United States government. The Tennessee Valley Authority was established to develop the resources of the Tennessee Valley region in order to strengthen the regional and national economy and the national defense.

Texas Public Funds Investment Act (The Act)

The Texas Public Funds Investment Act, as amended, provides guidelines for investment practices and lists authorized investments for state agencies and local governments.

United States Treasury Bills

United States Treasury Bills are direct obligations of the United States of America. Treasury Bills are secured by the full faith and credit of the United States government, are sold at a discount based on market yield, pay the par or face value at maturity, and are scheduled to mature within one (1) year.

United States Treasury Bonds

United States Treasury Bonds are direct obligations of the United States of America. Treasury Bonds are secured by the full faith and credit of the United States government, have fixed interest rates, pay interest semiannually and are scheduled to mature within 10 years and 1 day to 30 years.

United States Treasury Notes

United States Treasury Notes are direct obligations of the United States of America. Treasury Notes are secured by the full faith and credit of the United States government, have fixed interest rates, pay interest semiannually and are scheduled to mature from 2 to 10 years.

United States Treasury STRIPS

United States Treasury STRIPS (Separate Trading of Registered Interest and Principal Securities) are direct obligations of the United States of America. Treasury STRIPS are secured by the full faith and credit of the United States government. Treasury STRIPS are zero coupon securities derived from selected Treasury Bonds and Notes that are separated on the books of the Federal Reserve Bank into their component parts of principal and interest and sold separately at a price that is equal to the present value computed at a present value discount based on market yield. Interest compounds semiannually and is paid at maturity along with the principal.



CITY OF SAN ANTONIO
Request for Council Action

Agenda Item # 37
Council Meeting Date: 9/18/2008
RFCA Tracking No: R-3878

DEPARTMENT: Finance

DEPARTMENT HEAD: Ben Gorzell

COUNCIL DISTRICT(S) IMPACTED:
City Wide

SUBJECT:
Investment Policy Annual Review

SUMMARY:

This ordinance approves an Investment Policy for the City of San Antonio, Texas, in accordance with the requirement of the Texas Public Funds Investment Act (the "Act"), as amended, for City Council to annually review and to approve the City's Investment Policy; designates certain employees as Investment Officers for the City of San Antonio; and provides an effective date.

BACKGROUND INFORMATION:

The purpose of the City's Investment Policy is to provide a framework for the prudent and efficient investment of City funds, with the objectives of preservation and safeguarding of principal, liquidity, diversification, and yield on investments. The Investment Policy designates the following employees as Investment Officers for the City of San Antonio: Director of Finance, Assistant Director of Finance – Financial Services, Tax Assessor/Collector Administrator, and the following individuals from the Division of Financial Management: Financial Management Administrator, Financial Manager, Banking Officer, Debt Officers, and Investment Officers. The Investment Policy also designates the composition of the City's Investment Committee. The Investment Committee is comprised of two representatives from the City Council, two representatives from the City Manager's Office, the Director of Finance, Assistant Director of Finance – Financial Services, Director of the Office of Management and Budget, Tax Assessor/Collector Administrator, and the following individuals from the Division of Financial Management: Financial Management Administrator, Financial Manager, Banking Officer, Debt Officers, and Investment Officers.

The Act requires an annual review of the Investment Policy by City Council. During the 2008 legislative session, no amendments were made to the Act. However, the following sections of the Investment Policy were revised: Investment Objectives section and globally throughout the document, the term "rate of return" was replaced with "maximize yield"; Prudence section language was added to limit the liability of Investment Officers for changes in market values; Investment Maturities section eliminated the option of the Director of Finance to approve extending maturities past five (5) years and established a maximum investment maturity of five (5) years; Authorized Investments section increased the collateral requirement from 100% to 102% for Securities Lending; and the Investment Strategy section established a maximum

three (3) year Weighted Average Maturity ("WAM") for all funds.

The proposed changes to the Investment Policy were reviewed and approved by the City's Investment Committee on August 13, 2008.

In accordance with the Act and the Investment Policy, a Request for Qualifications to Provide Broker/Dealer Services to the City of San Antonio ("Broker/Dealer RFQ") was mailed to forty (40) firms on June 30, 2008. On July 25, 2008, thirty-one (31) firms responded. The written proposals were scored according to the criteria incorporated in the Broker/Dealer RFQ, which included experience, background and qualifications, broker/dealer services, and Small Business Economic Development Advocacy Program ("SBEDA") goals. The proposals were grouped within three (3) categories based on capital: firms with capital greater than \$500,000,000.00; firms with capital greater than \$20,000,000.00 but less than \$500,000,000.00; and firms with capital less than \$20,000,000.00. The scoring in these three categories provided a better opportunity for large, medium, small, local, and SBEDA firms to compete with one another. The highest scoring firms in each category were recommended to the Investment Committee.

On August 13, 2008, the following firms were approved by the Investment Committee to engage in investment transactions with the City for a two-year period beginning October 1, 2008 through September 30, 2010.

- Apex Securities Inc., d/b/a Rice Financial Products Company*
- Bank of America Securities LLC
- Cabrera Capital Markets, LLC*
- FTN Financial Capital Markets
- J.P. Morgan Securities Inc
- Loop Capital Markets, LLC*
- Merrill Lynch, Pierce, Fenner & Smith, Incorporated
- Mizuho Securities USA, Inc.
- Robert W. Baird & Co. Inc.
- Seattle Northwest Securities
- Stifel, Nicolaus & Company, Incorporated

*SBEDA firm.

While it was anticipated that the firms listed above will remain in effect for a two-year period, the Investment Committee is required to review, revise, and adopt the list of qualified, eligible Broker/Dealers and banks with whom the City does business during Fiscal Year 2009.

ISSUE:

The annual review of the City's Investment Policy and the designation of certain City employees as Investment Officers for the City of San Antonio is consistent with the Act requirements. In addition, the Investment Policy complies with all other requirements of the Act and provides the framework that is utilized by City staff to manage the City's investment portfolio, invest in money market mutual funds and mutual funds, and to execute investment transactions with Broker/Dealers.

ALTERNATIVES:

Taking no action to approve this ordinance will cause the City to fail to comply with the requirements of the Act to annually review the City's Investment Policy and review, revise, and adopt the list of qualified, eligible Broker/Dealers.

FISCAL IMPACT:

This ordinance has no direct financial impact; however, approval of this Investment Policy provides the mechanism for the prudent, stable, and efficient administration of the City's investment activity.

RECOMMENDATION:

Staff recommends approval of this Ordinance approving an Investment Policy for the City of San Antonio, Texas, in accordance with the requirement of the Texas Public Funds Investment Act as amended.

ATTACHMENT(S):

File Description	File Name
Broker Dealer Discretionary Contracts Disclosure Forms	Broker Dealer Discretionary Contracts Disclosure Forms.pdf
Investment Policy 2008	Investment Policy 2008.pdf
Voting Results	
Ordinance/Supplemental Documents	200809180831.pdf

DEPARTMENT HEAD AUTHORIZATIONS:

Ben Gorzell Director Finance

APPROVED FOR COUNCIL CONSIDERATION:

Pat DiGiovanni Deputy City Manager