

CARLISLE AREA SCHOOL DISTRICT

SECTION: FINANCES
TITLE: INVESTMENT OF
DISTRICT FUNDS
ADOPTED: November 16, 2006
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April 21, 2022

609. INVESTMENT OF DISTRICT FUNDS

Purpose

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

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

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

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

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

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

Authority

All investments of the school district made by an officer and/or employee of the district shall be made in accordance with this policy. [1][2][3][4]

Definitions

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

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

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

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

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

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

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

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

Investment program - the specifically enumerated investment strategy.

Local Government Investment Pool – An investment trust or pool organized by groups of political subdivisions or municipal authorities pursuant to Section 51 of the Public School Code of 1949, or pursuant to the Intergovernmental Cooperation Law, 53 Pa. C.S.A. Sec. 2300 et seq., for the purpose of investing funds of such political subdivisions or municipal authorities for their exclusive benefit and in accordance with the laws governing their permissible investments. LGIPs include, but are not limited to, the Pennsylvania School District Liquid Asset Fund (PSDLAF), the Pennsylvania Local Government Investment Trust (PLGIT), and for purposes of this policy, the PA INVEST program operated by the Pennsylvania Treasury Department. [5][6]

Delegation of Responsibility

The Board shall delegate to a designated individual the responsibility to manage the district's investment program, in accordance with written procedures for operation of the investment program. [1]

An annual review of the investment program shall be prepared by the designated individual, based upon the anticipated cash flow of all district funds, i.e. general, capital reserve, bond, etc.

The designated individual responsible for investments shall report monthly to the Board the following: [1][7]

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

5. Current market value of the funds invested.
6. Confirmation of collateralization when deposits exceed FDIC insurance limits.

The Board directs the Superintendent or designee to establish administrative guidelines that will ensure compliance with this policy, including a disclosure form for designated individuals involved in the investment process and/or required written statements for advisors and bidders.

Guidelines

Investments permitted by this policy are those defined in law, which are collateralized in accordance with applicable laws. [1]

All securities shall be purchased in the name of the school district, and custody of the securities shall be specified within the district's investment program.

An exception to purchases in the name of the school district is permitted for the purchase of shares of an investment company that is or conducts business voluntarily in compliance with applicable law. [8]

All investment advisors or bidders shall verify in writing that they have received a copy of this policy. Such written statement shall indicate that they have read and understand this policy and all applicable laws related to school district investments, along with their intent to comply fully with these requirements. [1]

The district shall require all investment advisors/bidders to submit annually any or all of the following, as appropriate:

1. Audited financial statements.
2. Proof of **Financial Industry Regulatory Authority (FINRA)**.
3. Proof of state registration.
4. Rating from a recognized rating agency.

Disclosure

Designated officers and employees involved in the district's investment process shall disclose any personal business activity that could conflict with the proper execution and management of the investment program or could impair their ability to make impartial decisions. [9]

Audit

The Board directs that all investment records be subject to annual audit by the independent auditors hired by the district. [10]

The audit shall include but not be limited to independent verification of amounts and records of all transactions, as deemed necessary by the independent auditors.

It shall be the responsibility of the investment advisor and/or bidder to maintain necessary documents to permit independent audit of the district's investments.

Bond Proceeds

Bond proceeds shall be invested in accordance with the Local Government Unit Debt Act and applicable federal and state laws, subject to approval by the solicitor and/or bond counsel and the School Board. [11]

Investment transactions arising from bond proceeds shall be reported monthly to the Board, in accordance with this policy.

Compliance With GAAP

The following is intended to guide district investments as limited by law. [12][1]

1. District funds shall not be invested in foreign currency and shall have no related risk that would require disclosure pursuant to GASB Statement 40.
2. District investments shall limit the exposure to loss of principal due to market changes in interest rates.
3. District investments in authorized instruments that are not backed by the "full faith and credit" of the federal or state government shall be limited to those with the highest credit rating available for such instruments issued by a recognized organization.

If, after purchase, the rating of any instrument is reduced and is no longer in compliance with this policy, the individual responsible for district investments shall replace the investment immediately upon receipt of notice of the rating change.

4. When district funds are invested in any one (1) issuer other than designated depository accounts (which includes external investment pools), and securities issued or explicitly guaranteed by the U.S. Government (owned directly by the district), the amount of the investment shall be unlimited, but the Board shall be notified of such investment monthly.
5. For purposes of interest rate disclosure in the annual financial report, the method of determining

interest rate risk shall be based on weighted average maturity.

Protection Of Bank Balances In Excess Of FDIC Limits

When district cash is deposited in an authorized depository, if the cash balance exceeds the insurance limits, district funds shall be collateralized pursuant to law. [1][7]

The collateral shall be limited to investments authorized by law.

It shall be the responsibility of the Business Manager to verify with the depository the value of the instrument(s) based on the instrument being “marked to market.”

Verification of the value of the collateral instrument(s) shall occur monthly.

Following a review of valuation, the Business Manager may request an additional review by the district’s investment advisors or financial consultant, and shall require additional collateral if the existing collateral has declined in value and exposes the district to potential loss of principal. The Board shall be advised of the status of the valuation review and any additional collateral at the first meeting following the review.

Legal References:

1. 24 P.S. 440.1
 2. 24 P.S. 621
 3. 24 P.S. 622
 4. 24 P.S. 623
 5. 24 P.S. 521
 6. 53 Pa. C.S.A. 2301 et seq
 7. 72 P.S. 3836 et seq.
 8. 17 CFR Part 270
 9. 65 Pa. C.S.A. 1101 et seq.
 10. Pol. 619
 11. 53 Pa. C.S.A. 8001 et seq.
 12. 24 P.S. 218
- Pol. 000