



**CITY OF ST. LOUIS
MENTAL HEALTH BOARD OF TRUSTEES**

INVESTMENT POLICY

I. SCOPE

This policy applies to the investment of excess operating or longer-term reserve funds of the St. Louis Mental Health Board.

1. Pooling of Funds

Except for certain restricted and special funds, the City of St. Louis Mental Health Board will consolidate cash balances from all funds to maximize investment earnings. Investment income will be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting principles.

2. External Management of Funds

Investment through external programs, facilities and professionals operating in a manner consistent with this policy will constitute compliance.

II. GENERAL OBJECTIVE

The primary objectives, in priority order of investment activities; shall be safety, liquidity and yield.

1. Safety

Safety of principal is the foremost objective of the investment program. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The objective will be to mitigate credit risk and interest rate risk.

a. Credit Risk

The City of St. Louis Mental Health Board will minimize credit risk, the risk of loss due to the failure of the security issuer or backer, by:

- i. Pre-qualifying the financial institutions, brokers/dealers, intermediaries, and advisors with which the City of St. Louis Mental Health Board will do business
- ii. Diversifying the portfolio so that potential losses on individual securities will be minimized

b. Interest Rate Risk

The City of St. Louis Mental Health Board will minimize the risk that the market value of securities in the portfolio will fall due to changes in general interest rates by:

- i. Structuring the investment portfolio so that securities mature to meet cash requirements for ongoing operations, thereby avoiding the need to sell securities on the open market prior to maturity
- ii. Investing operating funds primarily in shorter-term securities

2. Liquidity

The investment portfolio shall remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated. This is accomplished by structuring the portfolio so that securities mature concurrent with cash needs to meet anticipated demands (static liquidity). Furthermore, since all possible cash demands cannot be anticipated, the portfolio should consist largely of securities with active secondary or resale markets (dynamic liquidity). A portion of the portfolio also may be placed in bank deposits or repurchase agreements that offer same-day liquidity for short-term funds.

3. Yield

The investment portfolio shall be designed with the objectives of attaining a market rate of return throughout budgetary and economic cycles, considering the investment risk constraints and liquidity needs. Return on investment is of secondary importance to the safety and liquidity objectives described above. The core of investments is limited to relatively minimal risk securities in anticipation of earning a fair return relative to the risk being assumed. Securities shall not be sold prior to maturity with the following exceptions:

- a. A security with declining credit may be sold early to minimize loss of principal.
- b. A security swap would improve the quality, yield, or target duration in the portfolio.
- c. Liquidity needs of the portfolio require that the security be sold.

III. STANDARDS OF CARE

1. Prudence

The standard of prudence to be used by investment officials shall be the “prudent person” standard and shall be applied in the context of managing an overall portfolio. Investment officers acting in accordance with written procedures and this investment policy and exercising due diligence shall be relieved of personal responsibility for an individual security’s credit risk or market price changes provided deviations from expectations are reported in a timely fashion to the governing body and the liquidity and the sale of securities are carried out in accordance with the terms of this policy.

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 probable safety of their capital as well as the probable income to be derived.

2. Ethics and Conflicts of Interest

Officers and employees involved in the investment process shall refrain from personal business activity that could conflict with the proper execution and management of the investment program, or that could impair their ability to make impartial decisions. Employees and investment officials shall disclose any material interests in financial institutions in which they conduct business. They shall further disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. Employees and officers shall refrain from undertaking personal investment transactions with the same individual with which business is conducted on behalf of the City of St. Louis Mental Health Board.

3. Delegation of Authority

Authority to manage the investment program is granted to the Executive Director, (hereinafter referred to as investment officer), by resolution of the Board of Trustees and under the direction of the Investment Committee, duly appointed by the Chair of the Board of Trustees. Responsibility for the operation of the investment program is hereby delegated to the investment officer, who shall act in accordance with the established written procedures and internal controls for the operation of the investment program consistent with this investment policy. Procedures should include references to safekeeping, delivery vs. payment, investment accounting, repurchase agreements, wire transfer agreements, and collateral/depository agreements. No person may engage in an investment transaction except as provided under the terms of this policy and the procedures established by the investment officer. The investment officer shall be responsible for all transactions undertaken and shall establish a system of controls to regulate the activities of subordinate officials.

IV. INVESTMENT TRANSACTIONS

1. Authorized Financial Dealers and Institutions

A list will be maintained of financial institutions authorized to provide investment transactions. In addition, a list also will be maintained of approved security brokers/dealers selected by creditworthiness as determined by the investment officer and approved by the governing body. These may include "primary" dealers or regional dealers that qualify under Securities and Exchange Commission (SEC) Rule 15C3-1 (uniform net capital rule).

All financial institutions and brokers/dealers who desire to become qualified for investment transactions must supply the following, as appropriate:

- a. Audited financial statements
- b. Proof of Financial Industry Regulatory Authority (FINRA)
- c. Proof of state registration
- d. Completed broker/dealer questionnaire
- e. Certification of having read, understood and agreeing to comply with the City of St. Louis Mental Health Board's investment policy

An annual review of the financial condition and registration of qualified financial institutions and brokers/dealers will be conducted by the investment officer.

From time to time, the investment officer may choose to invest in instruments offered by emerging or minority firms and community financial institutions. In such situations, a waiver to the criteria under Paragraph 1 may be granted by the governing body. All terms and relationships will be fully disclosed prior to purchase and will be reported to the governing body of the City of St. Louis Mental Health Board on a consistent basis. The governing body of the City of St. Louis Mental Health Board should approve these types of investment purchases in advance.

2. Internal Controls

The investment officer, under the direction of the Investment Committee, is responsible for establishing and maintaining an internal control structure that will be reviewed annually with the City of St. Louis Mental Health Board's independent auditor, in conjunction with the annual audit. The internal control structure shall be designed to ensure that the assets of the City of St. Louis Mental Health Board are protected from loss, theft or misuse and to provide reasonable assurance that these objectives are met.

The concept of reasonable assurance recognizes that (1) the cost of control should not exceed the benefits likely to be derived and (2) the valuation of costs and benefits require estimates and judgments by management.

The internal controls shall address the following points:

- a. Control of collusion
- b. Separation of transaction authority from accounting and record keeping
- c. Custodial safekeeping
- d. Avoidance of physical delivery securities
- e. Clear delegation of authority to subordinate staff members
- f. Written confirmation of transactions for investments and wire transfers
- g. Development of a wire transfer agreement with the lead bank and third party custodian

3. Delivery vs. Payment

All trades where applicable will be executed by delivery vs. payment (DVP) to ensure that securities are deposited in eligible financial institutions prior to the release of funds. All securities shall be perfected in the name of the City of St. Louis Mental Health Board and shall be held by a third-party custodian as evidenced by safekeeping receipts.

V. SUITABLE AND AUTHORIZED INVESTMENTS

1. Investment Types

In accordance with and subject to restrictions imposed by current statutes, the following list represents the entire range of investments that the City of St. Louis Mental Health Board will consider, and which shall be authorized for the investment of funds by the City of St. Louis Mental Health Board.

- a. United States Treasury Securities The City of St. Louis Mental Health Board may invest in obligations of the United States government for which the full faith and credit of the United States are pledged for the payment of principal interest.
- b. United States Agency Securities The City of St. Louis Mental Health Board may invest in obligations issued or guaranteed by any agency of the United States government as described in V. (2)
- c. Repurchase Agreements The City of St. Louis Mental Health Board may invest in contractual agreements between the City of St. Louis Mental Health Board and commercial banks or primary government securities dealers. The purchaser in a repurchase agreement (repo) enters into a contractual agreement to purchase U.S. Treasury and government agency securities while simultaneously agreeing to resell the securities at predetermined dates and prices.
- d. Collateralize Public Deposits (Certificates of Deposit). Instruments issued by financial institutions which state that specified sums have been deposited for specified periods of time and at specified rates of interest. The certificates of deposit are required to be backed by acceptable collateral securities as dictated by State statute.
- e. Banker's Acceptance Time drafts drawn on and accepted by a commercial bank, otherwise known as bankers' acceptances. The City of St. Louis Mental Health Board may invest in bankers' acceptances issued by domestic commercial banks possessing the highest rating issued by Moody's Investor Services, Inc. or Standard and Poor's Corporation.
- f. Commercial Paper The City of St. Louis Mental Health Board may invest in commercial paper issued by domestic corporations, which has received the highest rating issued by Moody's Investor Services, Inc. or Standard and Poor's Corporation. Eligible paper is further limited to issuing corporations that have total assets in excess of five hundred million dollars (\$500,000,000).
- g. CDARS The City of St. Louis Mental Health Board may participate in the Certificate of Deposit Accounts Registry Service (CDARS) program providing it meets the requirements of 67.085 RSMo. which requires separate 100% deposit insurance provided by Federal deposit insurance. Funds may be deposited only in participating banks, which acts as custodian with respect to certificates of deposit.
- h. Funds that invest solely in investments in categories a. & b. above.

2. Security Selection

The following list represents the range of United States Agency Securities that City of St. Louis Mental Health Board will consider, and which shall be authorized for the investment of funds by the City of St. Louis Mental Health Board. Additionally, the following definitions and guidelines should be used in purchasing the instruments:

- a. U.S. Govt. Agency Coupon and Zero-Coupon Securities Bullet coupon bonds with no embedded options.
- b. U.S. Govt. Agency Discount Notes Purchased at a discount with maximum maturities of one (1) year.
- c. U.S. Govt. Agency Callable Securities Restricted to securities callable at par only with final maturities of five (5) years.
- d. U.S. Govt. Agency Step-Up Securities The coupon rate is fixed for an initial term. At coupon date, the coupon rate rises to a new, higher fixed term. Restricted to securities with final maturities of five (5) years.
- e. U.S. Govt. Agency Floating Rate Securities The coupon rate floats off one index. Restricted to coupons with no interim caps that reset at least quarterly.
- f. U.S. Govt. Mortgage-Backed Securities Restricted to securities with final maturities of five (5) years.

3. Investment Restrictions and Prohibited Transactions

To provide for the safety and liquidity of the City of St. Louis Mental Health Board's funds, the investment portfolio will be subject to the following restrictions:

- a. Borrowing for investment purposes ("Leverage") is prohibited
- b. Instruments known as Structured Notes (e.g., inverse floaters, leveraged floaters, and equity-linked securities) are not permitted. Investment in any instrument which is commonly considered a "derivative" investment (e.g., options, futures, swaps, caps, floors, and collars), is prohibited
- c. Contracting to sell securities not yet acquired in order to purchase other securities for purposes of speculating on developments or trends in the market is prohibited
- d. No more than 5% of the total market value of the portfolio may be invested in bankers' acceptances issued by any one commercial bank and no more than 5% of the total market value of the portfolio may be invested in commercial paper of any one issuer

4. Collateralization

Collateralization will be required on two types of investments: certificates of deposit and repurchase agreements. The market value (including accrued interest) of the collateral should be at least 100%.

For certificates of deposit, the market value of collateral must be at least 100% or the greater of the number of certificates of deposits plus demand deposits with the depository, less the amounts, if any, which is insured by the Federal Deposit Insurance Corporation, or the National Credit Unions Share Insurance Fund.

All securities, which serve as collateral against the deposits of a depository institution must be safekept at a non-affiliated custodial facility. Depository institutions pledging collateral against deposits must, in conjunction with the custodial agent, furnish the necessary custodial receipts within five business days from the settlement date.

The City of St. Louis Mental Health Board shall have a depository contract and pledge agreement with each safekeeping bank that will comply with the Financial Institutions, Reform, Recovery, and Enforcement Act of 1989 (FIRREA). This will ensure that the City of St. Louis Mental Health Board's security interest in collateral pledge to secure deposits is enforceable against the receiver of a failed financial institution.

5. Repurchase Agreements

The securities for which repurchase agreements will be transacted will be limited to Treasury and government agency securities that are eligible to be delivered via the Federal Reserve's Fedwire book entry system. Securities will be delivered to the City of St. Louis Mental Health Board's designated Custodial Agent. Funds and securities will be transferred on a delivery vs. payment basis.

VI. INVESTMENT PARAMETERS

1. Diversification

The investments shall be diversified to minimize the risk of loss resulting from over concentration of assets in specific maturity, specific issuer, or specific class of securities. Diversification strategies shall be established and periodically reviewed. Diversification standards by security type and issuer shall be:

- a. U.S. treasuries and securities having principal and/or interest guaranteed by the U.S. Government.....100%
- b. Collateralized time and demand deposits.....100%
- c. U.S. Government agencies, and government sponsored enterprises no more than 60%
- d. Collateralized repurchase agreements.....50%
- e. U.S. Government agency callable securities.....no more than 30%
- f. Commercial Paper.....no more than 30%
- g. Bankers' Acceptances.....no more than 30%

2. Maximum Maturities

To the extent possible, the City of St. Louis Mental Health Board shall attempt to match its investments with anticipated cash flow requirements. Investments in bankers' acceptances and commercial paper shall mature and become payable not more than one hundred eighty (180) days from the date of purchase. All other investments shall mature and become payable not more than five (5) years from the date of purchase. The City of St. Louis Mental Health Board shall adopt weighted average maturity limitations that should not exceed three (3) years and is consistent with the investment objectives.

Because of inherent difficulties in accurately forecasting cash flow requirements, a portion of the portfolio should be continuously invested in readily available funds such as in bank deposits or overnight repurchase agreements to ensure that appropriate liquidity is maintained to meet ongoing obligations.

VII. REPORTING

1. Methods

The investment managers shall prepare an investment report annually, including a management summary that provides an analysis of the status of the current investment portfolio and transactions made over the last quarter. This management summary will be prepared in a manner that will allow the City of St. Louis Mental Health Board to ascertain whether investment activities during the reporting period have conformed to the investment policy. The report should be provided to the MHB Finance/Investment Committee who will then summarize to the governing body of the City of St. Louis Mental Health Board. The report will include the following:

- a. Listing of individual securities held at the end of the reporting period.
- b. Realized and unrealized gains or losses resulting from appreciation or depreciation by listing the cost and market value of securities over one- year duration (in accordance with Government Accounting Standards Board (GASB) 31 requirements). (Note, this is only required annually)
- c. Average weighted yield to maturity of portfolio on investments as compared to applicable benchmarks.
- d. Listing of investment by maturity date.
- e. Percentage of the total portfolio which each type of investment represents.

2. Performance Standards

The investment portfolio will be managed in accordance with the parameters specified within this policy. The portfolio should obtain a market average rate of return during a market/economic environment of stable interest rates. A series of appropriate benchmarks shall be established against which portfolio performance shall be compared on a regular basis.

Commercial paper and bankers' acceptances must be reviewed monthly to determine if the rating level has changed: The commercial paper and bankers' acceptances should be reviewed for possible sale if the securities are downgraded below the minimum acceptable rating levels.

3. Marking to Market

The market value of the portfolio shall be calculated at least quarterly and a statement of the market value of the portfolio shall be issued at least annually to the governing body of the City of St. Louis Mental Health Board. This will ensure that review of the investment portfolio, in terms of value and price volatility, has been performed.

VIII. POLICY CONSIDERATION

1. Exemption

Any investment currently held prior to the adoption of this policy that does not meet the guidelines of this policy shall be exempt from the requirements of this policy. At maturity or liquidation, such monies shall be reinvested only as provided by this policy.

2. Adoption

This policy shall be adopted by resolution of the City of St. Louis Mental Health Board's governing body. The policy shall be reviewed annually by the Finance/Investment Committee and recommended changes will be presented to the governing body for consideration.

Revised May 2010