

City of Bellevue Investment Policy

Revised: December, 2015

Objectives

This policy sets forth criteria for the operation of the investment portfolio. It will be recognized that the primary objective of the Investment Policy is to establish a conservative set of investment criteria that will prudently protect Bellevue's (hereafter referred to as the City) principal sums and enable the City to generate a market rate of return from its investment activities while assuring adequate liquidity to meet its cash flow needs. All investment activity will be in compliance with RCW [35A.40.050](#) "Fiscal - Investment of Funds" and any other statutes or regulatory requirements, such as Internal Revenue Codes, which may apply.

Scope

This policy guides the investment of all available City funds except it does not include assets held in escrow in order to defease refunded debt, nor does it include retirement funds managed by others such as the state, the Municipal Employees Benefit Trust, and deferred compensation plan providers.

Responsibility

Authority to manage the investment program is derived from Bellevue City Code Section [3.37.060](#). This section gives the Finance Director authority to determine the amount of money available in each fund administered by the City for investment purposes, and the authority to invest such moneys in all forms of investments that are authorized by law. This section also authorizes the Director to designate a subordinate employee(s) to assist in the performance of these duties.

The Finance Director will provide a letter(s) of authorization to individuals or firms on the approved broker/dealer list specifically designating City staff who have the authority to commit the City to investment transactions.

The Finance Director or his/her designee will establish written investment procedures including a glossary of investment terms for the operation of the investment program, consistent with this investment policy.

Types of Investment and Diversification

The City may invest in any of the securities identified as eligible investments as defined by RCW 35A.40.050 "Fiscal - Investment of Funds". For purposes of this policy, the major eligible investment categories have been further restricted as follows:

1. United States Treasury Debt Obligations

- Maximum % of Portfolio 100%
- Maximum Remaining Maturity 5 years

2. United States Agency Securities backed by the full faith and credit of the United States Government for the payment of principal and interest

- Maximum % of Portfolio 100%

- Maximum Remaining Maturity 5 years
- Maximum % of Portfolio Per Issuer 25%
- Defined by RCW 43.84.080 to include certificates, notes, or bonds of the United States, or other obligations of the United States or its agencies, or of any corporation wholly owned by the government of the United States.
- Does not allow investments in derivatives or securities that derive value and/or yield from an underlying asset unless they fall into one of the following categories: 1) agency obligations that float with interest rates or external indexes such as CMT index, treasury bills, LIBOR, Prime rate and Fed Funds rate; 2) agency security obligations that have call features; and 3) agency security obligations that have step-up features at pre-determined intervals.
- Interest only and principal only mortgage backed securities, inverse floaters and collateralized mortgage obligations are excluded.
- Securities will be held by the City's third party custodian in the City's name.

3. United States Agency Coupon Securities (Mortgage-backed Securities Included)

- Maximum % of Portfolio 100%
- Maximum Remaining Maturity 5 years
- Maximum % of Portfolio Per Issuer 25%
- Defined by RCW 43.84.080 to include obligations of any United States government-sponsored corporation whose obligations are eligible as collateral for advances to member banks as determined by the Board of Governors of the Federal Reserve System.
- Does not allow investments in derivatives or securities that derive value and/or yield from an underlying asset unless they fall into one of the following categories: 1) agency obligations that float with interest rates or external indexes such as CMT index, treasury bills, LIBOR and Fed Funds rate; 2) agency security obligations that have call features; and 3) agency security obligations that have step-up features at pre-determined intervals.
- Interest only and principal only mortgage backed securities, inverse floaters and collateralized mortgage obligations are excluded.
- Securities will be held by the City's third party custodian in the City's name.

4. United States Agency Discount Notes

- Maximum % of Portfolio 100%
- Maximum Remaining Maturity 1 year
- Maximum % of Portfolio Per Issuer 25%
- Defined by RCW [43.84.080](#) to include obligations of any United States government-sponsored corporations whose obligations are eligible as collateral for advances to member banks as

determined by the Board of Governors of the Federal Reserve System.

- Securities will be held by the City's third party custodian in the City's name.

5. FDIC Guaranteed Senior Unsecured Debt Obligations – TLGP (Treasury Liquidity Guaranty Program) and other federal government guaranteed programs

- Required Investment Rating AAA/Aaa long-term and A-1/ P-1 short-term
- Maximum % of Portfolio 100%
- Maximum Remaining Maturity Not to exceed the lesser of the expiration date of FDIC's guarantee or 5 years
- Maximum % of Portfolio Per Issuer 5%
- To be eligible for purchase, the obligations must: 1) be guaranteed by the FDIC, and 2) carry the full faith credit of the United States Government.
- The note obligations must be issued by corporations organized and operating in the United States.
- Securities will be held by the City's third party custodian in the City's name.

6. Repurchase Agreements secured by United States Government and United States Agency Debt Obligations

- Maximum % of Portfolio 50%
- Maximum % of Portfolio With any Primary Dealers or Financial Institutions 10%
- Maximum Remaining Maturity 60 days
- Maximum Remaining Maturity of Underlying Collateral 5 years
- Collateral Pricing Daily
- All US Government Agency collaterals should stay within the 25% per issuer limit.
- Collateral equal to 102% of the repurchase agreement must be delivered to the City's third party custodian if less than 30 days. If the repurchase agreement is between 30-60 days, collateral equal to 105% of the repurchase agreement must be delivered to the custodian.
- Securities will be purchased from primary dealers or financial institutions that are members of the Washington Public Depository under a written Master Repurchase Agreement.
- Only US Treasury, US Government Agency, and US Government Sponsored Corporation securities may be accepted as collateral.
- Collateral securities will be held by the City's third party custodian, or through a tri-party arrangement in the City's name.

7. Certificates of Deposit, and other Interest Bearing Bank Deposits with financial institutions recognized by the State of Washington Public Deposit Protection Commission (PDPC) as qualified to hold public deposits.

- Maximum % of Portfolio 50%
- Maximum Remaining Maturity 1 year
- Maximum % of Portfolio Per Issuer 10%

8. Bankers Acceptances purchased on the secondary market

- Required Investment Rating Rated at the time of purchase in the highest tier (e.g., A-1, P-1, F-1 or better) of the accepting bank's short-term obligations by any two nationally recognized statistical rating organizations
- Maximum % of the Portfolio 15%
- Maximum Remaining Maturity 6 months
- Maximum % of Portfolio Per Issuer 5%
- Securities will be held by the City's third party custodian in the City's name.

9. Municipal Bonds or Warrants

- Required Investment Rating Rated at the time of purchase in one of the two highest credit ratings (Aaa/Aa) by any two nationally recognized statistical rating organizations
- Maximum % of the Portfolio 10%
- Maximum Remaining Maturity 5 years
- Maximum % of Portfolio Per Issuer 5%
- Bonds, notes or warrants issued by the State of Washington or any local government in the State of Washington (RCW 39.59.020).
- General obligation bonds of a state other than the State of Washington and general obligation bonds of a local government of a state other than the State of Washington (RCW 39.59.020).
- Securities will be held by the City's third party safekeeping agent in the City's name.

10. Commercial Paper Issued by United States Corporations in compliance with the provisions adopted by the State Investment Board [RCW 43.84.080](#) (7).

Ethics and Conflicts of Interest

Employees involved in the investment process shall refrain from personal business activity that could conflict with proper execution of the investment program, or which could impair their ability to make impartial investment decisions. These employees shall disclose to the City Manager and Finance Director any material financial interests in financial institutions that conduct business within this jurisdiction, and they shall further disclose any large personal financial/investment positions that could be related to performance of the City's portfolio, particularly with regard to the time of purchases and sales. Employees shall subordinate their personal investment transactions to those of the City.

Authorized Financial Dealers/Institutions and Financial Review

The Finance Director will approve financial institutions to be eligible to conduct investment business with the City. A current list of approved brokerage firms will be maintained by the Finance Director or his/her designee. This list may include primary dealers (government securities reporting to the Market Reports Division of the Federal Reserve Bank of New York), regional dealers that qualify under Securities and Exchange Commission (SEC) Rule 15C3-1 (uniform net capitalization), and national banks.

To become authorized to provide investment services to the City, each institution must provide an annual letter to the City from the individual providing the service certifying that he or she has read the City's investment policy and assures that all transactions with the City will fall within the policy boundaries. This letter shall also certify that the firm and broker assigned to this account have the required credentials and licenses with the NASD, SEC or appropriate agencies and that they must immediately notify the City if at any time the firm or broker is not in compliance with SEC rule 15C3-1, the firm's capital position falls short of the Capital Adequacy or uniform Net Cap Rule standard, or a material control weakness is identified by the firm's independent auditor. In addition, each institution must also provide the City with a copy of their annual audited financial report or Consolidated Report of Condition (call report).

In the case of certificates of deposit, those financial institutions recognized by the PDPC (Public Deposit Protection Commission) are qualified to hold public deposits.

An annual review of the audited financial report or call report of the selected qualified financial institutions will be conducted by Finance staff.

Broker Allocation

Investment transactions will be based upon the financial institution or brokerage firm that offers the best price to the City on each particular transaction. The City will make its best effort to obtain three bids for purchase or sale of government agency securities other than new issues. If circumstances dictate fewer than three bids due to the volatility of the market place, lack of bids, etc., the Finance Director, Assistant Finance Director or the Treasury Manager has the authority to waive this rule. Generally not all brokers will have the same inventory of agency securities available to sell, but should be able to offer comparable alternatives. Treasury security transactions will be accomplished at or within the bid or asked price spread indicated on the live Bloomberg screens or similar reliable real time investment information service. Issues not actively traded on such services will be subject to the three bid requirement. Bankers Acceptances and Certificates of Deposit (other than a compensating balance CD) also require the acquisition of at least three bids, and acceptance of the most attractive rate from among comparable alternatives. Where two or more institutions or brokers have offered the same low bid, allocation will go to the lowest bidder that has provided the best service to the City.

Custody

All security transactions, including collateral for repurchase agreements, entered into by the City shall be conducted on a delivery versus payment (DVP) basis. Securities will be held by a third party custodian

designated by the Finance Director or his designee as evidenced by confirmations in the City's name.

Internal Control

Investment procedures will be defined, documented, and implemented by the Finance Director or his/her designee to assure adequate internal control of the investment process.

The Finance Director or his/her designee will establish a process of periodic independent review by an external auditor or competent staff not assigned to the investment function.

The Washington State Auditor's Office will customarily conduct independent annual reviews of the investment function.

Reporting

Investment reports will be prepared and provided at least quarterly to meet the needs of the users including sufficient detail to provide an accurate and meaningful representation of the portfolio, showing its performance in relation to established benchmarks and its compliance with the investment policy.

Policy Adoption

The Investment Policy is adopted by the City Council as part of the biennial budget. The Finance Director has authority to approve changes to this Investment Policy.