

INVESTMENT POLICY

I. PURPOSE

The purpose of this document is to specify the policies and guidelines that provide for the prudent and productive investment of City of Cambridge (the City) funds. The City's investment program is operated by the City Treasurer in conformance with all applicable federal and state requirements including MGLA c.44, §§ 54 and 55.

This policy statement reflects the long-term policy guidelines that have been used by the City's management team, which are now incorporated into the City's annual Budget and Public Investment Program. Each year the City Manager will review these policy statements with the City Council, informing the public of the City's desire to maintain the highest standards of governance.

II. SCOPE

This policy applies to the investment of all of the City's funds excluding the investment of employees' retirement funds. Except for cash in certain restricted and special funds, the City will consolidate cash and reserve balances from all funds to maximize investment earnings and to increase efficiencies with regard to investment pricing, safekeeping and administration. Investment income will be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting principles.

III. INVESTMENT OBJECTIVES

The City shall seek as high a level of investment income as is consistent with, first: the safety of principal and second: the provision of liquidity to meet daily cash flow requirements.

A. Safety of Principal

Safety of principal, the primary objective, shall be pursued in a number of ways.

1. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio by protecting against credit risks.
2. Investments shall be made in conformance with prudent guidelines for allowable instruments, credit quality and maturities.
3. Adequate diversification of instruments, issuers and maturities shall be maintained.
4. All deliverable securities shall be held by a third party custodian on the basis of delivery vs. payment to a custodian bank.
5. All repurchase agreements shall be fully collateralized, with a custodian bank receiving delivery of the collateral.

B. Liquidity

The investment portfolio shall be structured to meet all of the City's cash requirements that may be reasonably anticipated. Furthermore, since all cash requirements cannot be anticipated, the portfolio should consist mainly of custodial arrangements, investment pools or money market funds specified below, securities or deposits with very short maturities, or securities with active secondary or resale markets.

C. Yield

The investment portfolio shall be designed to attain a market-average rate of return throughout budgetary and economic cycles, taking into account investment risk constraints and the City's liquidity requirements.

The portfolio shall be managed with the objective of exceeding the average of three-month U.S. Treasury Bill rates for the equivalent period. This index is considered a benchmark for near-riskless investment transactions and, therefore, comprises a minimum standard for the portfolio's rate of return. The investment program shall seek to augment returns above this threshold, consistent with stated risk limitations and prudent investment principles.

While investments shall not be made for the purpose of trading or speculating as the dominant criterion, the City may seek to enhance total portfolio return through active portfolio management. The prohibition on speculative investments precludes pursuit of gain or profit through unusual risk. Trading in response to changes in market value or market direction, however, is warranted under active portfolio management.

IV. STANDARDS OF CARE

A. 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. The "prudent person" standard states that "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."

Investment officers acting in accordance with written procedures and the 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 in writing and appropriate action is taken to control adverse developments.

B. 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 with 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 whom business is conducted on behalf of the City.

C. Delegation of Authority

Authority to manage the investment program is granted to the Director of Financial Systems and Operations, hereinafter referred to as the investment manager. The investment manager shall establish 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, 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 manager. The investment manager shall be responsible for all transactions undertaken and shall establish a system of controls to regulate the activities of subordinate officials. The controls shall be designed to prevent and control losses of public funds arising from fraud, employee error, misrepresentation by third parties, or imprudent actions by employees and officers. An investment committee, comprised of the City Treasurer, City Auditor, Budget Director and the investment manager, will meet monthly to review the investment program and activity.

V. FINANCIAL DEALERS AND INSTITUTIONS

The City shall conduct business only with qualified financial institutions. The investment manager shall develop criteria for selecting brokers and dealers. An annual review of the financial condition and registration of qualified bidders will be conducted.

All repurchase agreement transactions will be conducted through primary dealers of the Federal Reserve Bank of New York or applicable state agencies with short-term debt ratings of at least A-1, P-1 or F-1, or qualified depositories as described in the appropriate Section, which have executed master repurchase agreements with the City.

VI. INVESTMENT GUIDELINES

All investments must be made in securities authorized by MGL c.44, §§ 54 and 55 and this investment policy statement.

A. Suitable and Authorized Investments

The City may invest in the following securities or deposits:

- In term deposits or certificates of deposit in trust companies, national banks, savings banks, banking companies or cooperative banks.
- In obligations issued or unconditionally guaranteed by the United States government or one of its agencies.
- In United States government securities or securities of United States government agencies.

- Money market mutual funds regulated by the Securities and Exchange Commission and whose portfolios consist only of dollar-denominated securities; and
- Local government investment pools such as the Massachusetts Municipal Depository Trust and Massachusetts Municipal Depository Short Term Bond Fund.

No investments may be made in “derivative” securities such as futures, swaps, options, interest-only or principal-only mortgage-backed securities, inverse floaters, CMT floaters, leveraged floaters, dual index floaters, COFI floaters, and range floaters. These restrictions apply to direct investments as well as to investments through custodial arrangements, pools or money market funds discussed in applicable Sections. Thus, if a custodial arrangement, pool or fund includes securities listed in this paragraph, the City may not invest in shares or other interest in such custodial arrangement, pool or fund.

The City requires full collateralization on all demand deposit accounts including checking accounts, certificates of deposits and money market accounts.

The City shall not at any one time have on deposit in a bank, trust company or banking company an amount exceeding sixty per cent of the capital surplus of such bank, trust company or banking company unless satisfactory security is given to it by such bank, trust company or banking company for such excess.

B. Diversification

It is the policy of the City to diversify its investment portfolio. To eliminate risk of loss resulting from the over-concentration of assets in a specific maturity, issuer or class of securities, all cash and cash equivalent assets shall be diversified by maturity, issuer and class of security. Diversification strategies shall include:

1. At the time of acquisition, no more than ten percent (10%) of the overall portfolio may be invested in deposits with a single bank, unless the deposits are fully-insured or fully-collateralized, or in repurchase arrangements for a period longer than two business days conducted through a single dealer.
2. There is no limitation on the percentage of the overall portfolio that may be invested in: (1) U.S. government and agency obligations and in repurchase agreements fully collateralized by such securities, appropriate state pools, or an authorized custodial arrangement, pool or money market fund, if permitted by state statute, specified in the appropriate Section.
3. Investments in securities that are not readily marketable, other than securities or deposits that mature within seven days, may not exceed 10 percent of the portfolio’s net assets at the time of purchase.

This section does not apply to bank accounts used for the temporary deposit of receipts and deposits needed to cover disbursements that are expected to clear over the next seven days.

Investment decisions shall be based on the relative and varying yields and risks of individual securities and the City's liquidity requirements.

VII. REPORTS

Quarterly and annual reports summarizing the investment portfolio by security types and maturities, and describing the portfolio's performance relative to standard benchmarks (e.g., 90-day Treasury bills), shall be provided by the investment committee to the City Manager. A detailed portfolio listing, including cost, market valuations, maturities and commentary on economic conditions, shall be provided with each report.

VIII. PORTFOLIO VALUATION

The market value of the investment portfolio shall be determined on at least a monthly basis. Significant deviations of market values to amortized costs shall be reported promptly to the City Treasurer.

IX. ADOPTION

This policy shall be adopted by the City Council. Any revisions must be approved by the City Treasurer and City Council.

Any investment held at the time of this policy's adoption that does not conform with the policy shall be exempted from the requirements of the policy so long as such investment is a permitted City investment under state statutes. At maturity or liquidation of such investment, all proceeds shall be reinvested only as provided by this policy.

The City may invest or reinvest in an authorized custodial arrangement, pool or money market fund specified in the appropriate Section of this policy that currently contains in its portfolio securities that do not meet the criteria set forth in appropriate Section ("Non-Conforming Securities") only if (1) the custodial arrangement, pool or money market fund is a permitted City investment under state statutes, (2) the custodial arrangement, pool or money market fund has adopted a written investment policy that precludes future purchases of Non-Conforming Securities for its portfolio, and (3) the custodial arrangement, pool or money market fund has adopted a written investment policy of liquidating such Non-Conforming Securities as soon as practicable after market conditions permit such liquidation at par.

This policy shall be reviewed during the City's Annual Budget and Public Investment Program process.