



<p>4. Delegation of Responsibility SC 440.1</p> <p>SC 440.1 72 P.S. Sec. 3836 et seq</p>	<p><b>Concentration of credit risk</b> - the risk associated with the consolidation of investments in a single pool, institution, or instrument.</p> <p><b>Credit risk</b> - the risk of loss of principal due to the failure of the security issue or backer of the issue.</p> <p><b>Custodial credit risk</b> - the risk of loss associated with consolidation of investments with a single institution where the center may rely on the institution to hold investments on behalf of the center or through collateral action when the instruments are not in the center's name.</p> <p><b>Foreign currency risk</b> - the risk associated with investment in foreign currency that is subject to market fluctuation and associated currency conversion.</p> <p><b>Interest rate risk</b> - the risk that the market value of securities will fall due to changes in general interest rates.</p> <p><b>Investment program</b> - the specifically enumerated investment strategy approved by the Joint Operating Committee.</p> <p>The Joint Operating Committee shall delegate to a designated individual the responsibility to manage the center's investment program, in accordance with written rules and procedures approved by the Joint Operating Committee for operation of the investment program.</p> <p>The designated individual responsible for investments shall report monthly to the Joint Operating Committee the following:</p> <ol style="list-style-type: none"> <li>1. Amount of funds invested.</li> <li>2. Interest earned and received to date.</li> <li>3. Types and amounts of each investment and the interest earned on each.</li> <li>4. Other information required by the Joint Operating Committee.</li> </ol>
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<p>5. Guidelines SC 440.1</p>	<p>Investments permitted by this policy are those defined in law, which are collateralized in accordance with applicable laws.</p> <p>The center shall require all investment advisors/bidders to submit annually any or all of the following, as appropriate:</p> <ol style="list-style-type: none"> <li>1. Audited financial statements.</li> <li>2. Proof of National Association of Securities Dealers (NASD) certification.</li> <li>3. Proof of state registration.</li> <li>4. Rating from a recognized rating agency.</li> </ol> <p><u>Disclosure</u></p>
<p>65 Pa. C.S.A. Sec. 1101 et seq</p>	<p>Designated officers and employees involved in the center’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.</p> <p><u>Audit</u></p>
<p>Pol. 619</p>	<p>The Joint Operating Committee directs that all investment records be subject to annual audit by the center’s independent auditors.</p> <p>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.</p> <p>It shall be the responsibility of the investment advisor and/or bidder to maintain necessary documents to permit independent audit of the center’s investments.</p> <p><u>Bond Proceeds</u></p>
<p>53 Pa. C.S.A. Sec. 8001 et seq</p>	<p>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 Joint Operating Committee.</p> <p>Investment transactions arising from bond proceeds shall be reported monthly to the Joint Operating Committee, in accordance with policy.</p>

<p>SC 218, 440.1 GASB Stmt 40</p>	<p><u>Compliance With GAAP</u></p> <p>The following is intended to guide the center’s investments as limited by law:</p> <ol style="list-style-type: none"> <li>1. Center funds shall not be invested in foreign currency and shall have no related risk that would require disclosure pursuant to GASB Statement 40.</li> <li>2. Center investments shall limit the exposure to loss of principal due to market changes in interest rates.</li> <li>3. Center 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 two (2) credit ratings available for such instruments issued by a recognized organization.</li> </ol> <p>If, after purchase, the rating of any instrument is reduced and no longer in compliance with this policy, the individual responsible for center investments shall advise the Joint Operating Committee at the earliest opportunity of such action and make recommendations for altering investments.</p> <ol style="list-style-type: none"> <li>4. When center 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 center, the amount of the investment shall be unlimited, but the Joint Operating Committee shall be notified of such investment monthly.</li> <li>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.</li> </ol>
<p>SC 440.1 72 P.S. Sec. 3836 et seq</p>	<p><u>Protection Of Bank Balances In Excess Of FDIC Limits</u></p> <p>When the center’s cash is deposited in an authorized depository, if the cash balance exceeds the insurance limits, center funds shall be collateralized pursuant to law.</p> <p>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.”</p> <p>Verification of the value of the collateral instrument(s) shall occur quarterly.</p>

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

References:

School Code – 24 P.S. Sec. 218, 440.1, 621, 622, 623

Local Government Unit Debt Act – 53 Pa. C.S.A. Sec. 8001 et seq.

Public Officials and Employee Ethics Act – 65 Pa. C.S.A. Sec. 1101 et seq.

Security of Public Deposits – 72 P.S. Sec. 3836 et seq.

Investment Companies, Title 17, Code of Federal Regulations – 17 CFR Part 270

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