

# C-14

October 5, 2021

HONORABLE MAYOR AND CITY COUNCIL  
City of Long Beach  
California

## RECOMMENDATION:

Adopt the Statement of Investment Policy for Calendar Year 2022 pursuant to Section 53646(a) of the State of California Government Code. (Citywide)

## DISCUSSION

In accordance with the State of California Government Code, Section 53646, et seq., the City Treasurer must present to the City Council an annual Statement of Investment Policy (Investment Policy). The Investment Policy for the City is based on policies recommended by several professional organizations, including the California Municipal Treasurers' Association and the Government Finance Officers Association.

The California Government Code Section 53601 that governs investment by local agencies was recently amended. The attached Investment Policy for Calendar Year 2022 (Policy) includes updates to align with those changes. The revision to Section 1.4.3 (B) of the Policy reflects the change to Government Code Section 53601.6(b)(2) that permits local agencies to invest in zero or negative-yielding government-issued securities during rare periods of market duress and negative market rates. The revision to Appendix D of the Policy, Section 6 reflects the change to Government Code Section 53601(h) that permits local agencies with investment assets under management exceeding \$100 million to invest up to a maximum 40 percent of the portfolio in Commercial Paper. There are also a number of non-material language improvements to various sections that are updated in Appendix D.

The Policy was reviewed and approved by the Investment Advisory Committee, composed of the Assistant City Auditor, Deputy City Attorney, City Treasurer, City Controller, and designated representatives from the Harbor and Water Departments. The Policy was reviewed by the City's Investment Advisor, Chandler Asset Management. The changes are detailed in Attachment A.

There is also a significant change in the City's investment practices authorized under the State Government Code and City Policy. The change in practice is that the City has resumed investing, on a limited basis, in corporate securities, which were administratively discontinued in response to the global financial crisis of 2008 and the subsequent Great Recession. At that time, Lehman Brothers, a global investment bank, filed for bankruptcy. Many companies and governments, including the City, invested in Lehman Brothers corporate securities and had investment losses. Since then, the City has engaged a professional investment advisor to assist City staff in ensuring that purchased investment

HONORABLE MAYOR AND CITY COUNCIL

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securities are safe and the market is continually monitored for risk. In addition, the Treasurer's Office is currently administratively limiting corporate securities to no more than approximately 5 percent of the total portfolio. It is important to note that throughout the Great Recession and into the recovery, corporate securities remained an authorized investment for municipalities under California Government Code Section 56301. Attachment B provides further background and information on the City's reinstatement of corporate securities investments.

This matter was reviewed by Deputy City Attorney Taylor M. Anderson and Budget Management Officer Rhutu Amin Gharib on August 17, 2021.

TIMING CONSIDERATIONS

The Government Code requires the City Council's annual adoption of the City's Investment Policy.

FISCAL IMPACT

This recommendation has no staffing impact beyond the normal budgeted scope of duties and is consistent with existing City Council priorities. There is no fiscal or local job impact associated with this recommendation.

SUGGESTED ACTION:

Approve recommendation.

Respectfully submitted,



KEVIN RIPER  
DIRECTOR OF FINANCIAL MANAGEMENT

- ATTACHMENTS: A – INVESTMENT POLICY CHANGES  
B – 2022 INVESTMENT POLICY  
C – 2022 INVESTMENT POLICY REDLINED  
D – MEMO REINSTITUTION CORPORATE SECURITIES

APPROVED:



THOMAS B. MODICA  
CITY MANAGER

## Attachment A – 2022 Investment Policy Changes

Section #	Change Description	Page No.
1.4.3 (B)	Align with CA Government Code Section 53601.6(b)(2) updates that allow a local agency to invest in securities issued by, or backed by, the United States government that could result in zero- or negative-interest accrual if held to maturity, in the event of, and for the duration of, a period of negative market interest rates under a provision sunseting on January 1, 2026.	3
<b>APPENDIX D</b>		
6	<p>Added words “or equivalent” to the minimum rating requirement so that the language is more applicable across the three Nationally Recognized Statistical Rating Organization (NRSROs).</p> <p>Align with CA Government Code Section 53601(h) where local agencies that have one hundred million dollars (\$100,000,000) or more of investment assets under management to invest up to 40% of their moneys in eligible commercial paper with a sunseting date of January 1, 2026.</p>	9
2, 3, 5, 7, 10, 11, 14, 15	Added words “or equivalent” to the minimum rating requirement so that the language is more applicable across the three Nationally Recognized Statistical Rating Organization (NRSROs).	9-12



# **INVESTMENT POLICY**

**Effective January 1, 2022**

# **INVESTMENT POLICY**

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## 1.1 Scope

- 1.1.1 In accordance with Resolution No. C-22401, the City Treasurer is authorized to invest the City's funds in accordance with the State of California Government Code, Section 53600, et seq. The objective of the Investment policy ("Policy") is to ensure that the temporarily idle funds of the City of Long Beach are prudently invested to preserve capital and provide necessary liquidity, while maximizing earnings.
- 1.1.2 Investments may only be made as authorized by the State of California Government Code, Section 53600, et seq., the ("Code") and this policy. This policy conforms to the Code as well as to customary standards of prudent investment management. Should the provisions of the Code become more restrictive than those contained herein, such provisions will be considered as immediately incorporated in this policy.
- 1.1.3 This policy sets forth the City's investment of surplus funds in the Investment Pool. Excluded from this policy are guidelines for the investment of Debt Service and Reserve and Deferred Compensation Funds.
- 1.1.4 All authorized officers are governed by this policy, The City Treasurer is responsible for monitoring and ensuring that the total funds subject to this policy remain in compliance with this policy, and shall report to the City Council regularly on compliance.

## 1.2 Investment Objectives

- 1.2.1 The primary objectives, in priority order, of the City's investment activities shall be:
  - A. **Safety:** Safety of principal is the foremost objective of the investment program; however, risk is inherent throughout the investment process. The City's investments shall be undertaken in a manner that seeks to maximize the preservation of capital in the overall portfolio and minimize the risk related to capital losses from institutional default, broker-dealer default, or erosion of market value.
  - B. **Liquidity:** The City's Investment Pool will remain sufficiently liquid to meet all operating requirements that might be reasonably anticipated.
  - C. **Yield:** The City shall manage its funds to maximize the return on investments consistent with the two primary objectives of safety and liquidity. The investment goals are to maximize interest income through the prudent implementation of the Policy.
- 1.2.2 It is the intent of this policy to hold investments until maturity, however, if the City's liquidity needs require that investments be sold at a gain or loss, or

because of a downgrade of credit quality, national or public issues, or to take advantage of market conditions which will result in a gain on reinvestment of the sale proceeds, the security may be sold and the decline in value shall be recorded as a loss.

- 1.2.3 Investments shall be made in the context of the “Prudent Investor” standard which states: "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 in the context of managing an overall portfolio”.
- 1.2.4 Authorized Officers in the management of the Investment Pool shall use the “Prudent Investor” standard. Investment officers acting in accordance with this investment policy, and written portfolio procedures 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 the quarterly investment report to the City Council, and appropriate action is taken to control adverse developments.

### **1.3 Delegation of Authority**

- 1.3.1 The City Council shall be the trustee of funds received by the City. In accordance with the Code, Section 53607, and Resolution C-22401, the City Council hereby delegates the authority to invest or reinvest the City's funds, to sell or exchange securities so purchased and to deposit securities for safekeeping to the City Treasurer.
- 1.3.2 The City Treasurer shall establish written procedures for the investment of surplus funds, consistent with this policy, including establishment of appropriate written agreements with financial institutions. The City Treasurer may engage independent investment managers or Advisors to assist in the investment of the City's financial assets.
- 1.3.3 No person may engage in an investment transaction except as provided under the terms of this policy and the procedures established by the City Treasurer.
- 1.3.4 Officers and employees involved in the investment process shall refrain from personal business activity that could conflict with the proper execution of the investment program or which could impair their ability to make impartial investment decisions. All investment personnel shall comply with the reporting requirements of the Fair Political Practices Committee and include an annual filing of a Statement of Economic Interests.

## 1.4 Permitted and Prohibited Investments

- 1.4.1 All surplus funds which are not required for immediate cash expenditures shall be invested in income producing investments or accounts, in compliance with the provisions and restrictions of this Policy as outlined in Appendix A and as specifically authorized by the Code, Section 53600, et seq.

In order to reduce overall portfolio risk, investments shall be diversified among types of investments, maturities of those investments, issuers and depository institutions. See Appendix A for specific concentration limits by type of investment.

All investment concentration limits and minimum quality guidelines are to be applied at all times.

- 1.4.2 Maturities of individual investments shall be diversified to meet the following objectives:

- A. Investment maturities will be first and foremost based on the City's anticipated cash flow requirements.
- B. No investment instrument shall be purchased which matures more than five years from the settlement date, unless the instrument is specifically approved by the City Council or is approved by the City Council as part of an investment program and such approval must be granted no less than three months prior to the investment.
- C. The maximum weighted average maturity of the Investment Pool shall be three (3) years.

- 1.4.3 This Policy specifically prohibits the investment of any funds subject to this policy in the following securities:

Derivative securities, as defined in Section 53601.6 of the Code as any security that derives its value from an underlying instrument, index, or formula, are prohibited. The derivative universe includes, but is not limited to, futures, options, structured and range notes, securities that could result in zero interest accrual if held to maturity, variable rate, floating rate or inverse floating rate investments, and mortgage derived interest or principal only strips.

Funds may be invested in securities issued by, or backed by, the United States government that could result in zero- or negative-interest accrual if held to maturity, in the event of, and for the duration of, a period of negative market interest rates per Code Section 53601.6(b)(2) as an exception, with sunseting date on January 1, 2026, to previously prohibited investment in any security that could result in a zero-interest accrual if held to maturity.

**1.5 Selection of Depository Institutions, Investment Managers and Broker-Dealers**

- 1.5.1 To minimize the risk to the City's overall cash and Investment Pool, prudence and due diligence as outlined below shall be exercised with respect to the selection of financial institutions in which the City's funds are deposited or invested.
- A. In selecting Depositories pursuant to the Code, Section 53600, et seq., the credit worthiness, financial stability, and financial history of the institution, as well as the cost and scope of services and yields offered shall be considered. No funds will be deposited in an institution unless that institution has been evaluated by a nationally recognized independent rating service as satisfactory or better.
  - B. Deposits of \$250,000 or less which are insured pursuant to federal law by the Federal Deposit Insurance Corporation (FDIC), or the National Credit Union Administration (NCUA) may be excluded from the independent rating service evaluation requirement above and from the collateralization requirements of Section 1.6.3 of this Policy, at the City Treasurer's discretion.
- 1.5.2 Pursuant to the Code, Section 53601.5, the City and its Investment Managers shall only purchase statutorily authorized investments either from the issuer, from the broker-dealer licensed by the state, as defined in Section 25004 of the Corporations Code, from a member of a federally regulated securities exchange, a national or state-chartered bank, a federal or state association (as defined by Section 5102 of the Financial Code) or from a brokerage firm designated as a primary government dealer by the Federal Reserve Bank. Selection of broker/dealers who the City can purchase or sale investments shall be made by reviewing past performance and contacting references. The City's Investment Advisor, if applicable, will be used to review the information provided and make a recommendation based upon their research.
- A. Internal investment managers will only purchase or sell securities from broker-dealers defined in section 1.5.2 of the Policy and meet the minimum requirements of being registered and licensed by the National Association of Securities Dealers (NASD) and possess an active Series 7 license, an active Series 66 license (or Series 63), submission of a NASD form U4 (employment history) and a current NASD form U5 Disclosure Statement and have completed the City's broker/dealer questionnaire.
  - B. Internal investment managers will only use broker-dealers that have a minimum of three years of experience working for a primary dealer or five years working for a non-primary dealer.

- 1.5.3 Selections of external investment manager(s)/Advisors to manage a portion of the Investment Pool shall be based on an RFP process, which will include, at the minimum, past performance, stability, financial strength, reputation, area of expertise, and willingness and ability to provide the highest investment return at the lowest cost to the City within the parameters of this Policy and the California Government Code. External investment managers must be registered with the Securities and Exchange Commission (SEC) under the Investment Advisor Act of 1940.
- A. External investment managers may purchase or sell securities from non-Primary Dealers qualified under U.S. Securities and Exchange Commission Rule 15C3-1, the Uniform Net Capital Rule, and provided that the dealer is a certified member of the National Association of Securities Dealers. External investment managers shall submit to the City at least quarterly, a list of the non-Primary Dealers used during the period.
  - B. External investment managers must certify in writing that they will purchase securities in compliance with this Policy, City Procedures, and applicable State and Federal laws.
- 1.5.4 Depositories, and external investment managers, who do business with the City, shall sign a Certification of Understanding (see Appendix B). All broker-dealers who do business with the City's internal investment managers shall acknowledge receipt of the City's Investment Policy (see Appendix C).

## **1.6 Custody and Safekeeping of Securities and City Funds**

- 1.6.1 Collateral pledged for investments in Repurchase Agreements, shall be held by the City's Custodial Agent or a third-party Trust Department approved by the City Treasurer. Third party transactions will be governed by an Agreement between all parties on the disposition of the pledge securities in the event of default or non-compliance with the terms of the Repurchase Agreement.
- 1.6.2 All purchases and sales of securities in the Investment Pool shall be settled "delivery-versus-payment", using the appropriate delivery system for the security, i.e., Federal Reserve Book entry, Depository Trust Company ("DTC") or physical delivery to the appropriate party designated financial institution or Trust Company. The City portfolio shall be held in safekeeping by a third-party custodian, acting as agent for the City under the terms of a custody agreement executed by the custodian and the City. Exception to this policy are, mutual fund investments, and Local Agency Investment Fund, pledged collateral, or other Local Government Investment Pools

Funds deposited by the City shall be secured by a Depository in compliance with the requirements of the Code, Section 53652.

- 1.6.3 Investment securities in bearer form such as Negotiable Certificates of Deposit and Bankers' Acceptances shall be held in a qualified safekeeping financial institution or Trust Department designated by the City.

## **1.7 Reports and Communications**

- 1.7.1 The City Treasurer is responsible for ensuring compliance with all applicable Local, State, and Federal laws governing the reporting of investments made with public funds. The Investment Pool will be monitored for compliance. Non-compliance issues will be included in the quarterly City Council report as stated in Section 1.7.3 of this Policy.
- 1.7.2 The City Treasurer shall annually submit a statement of investment policy to the City Council for approval. The existing approved policy will remain in effect until the City Council approves the recommended statement of investment policy.
- 1.7.3 The City Treasurer shall render a quarterly cash, investment, and transaction report to the City Manager (referred to as the Chief Executive Officer by the Code, Section 53646, b), the City Auditor and the City Council within a reasonable time period, but no later than 90 days following the end of the quarter covered by the report, subject to Investment Advisory and City Council meeting schedules. The report shall include a description of the City's funds, investments, or programs that are under the management of the contracted parties, including lending programs. The report shall include at a minimum:
- A. A detail report listing the type of investment, name of the issuer, maturity date, par value and cost, accrued interest and market value.
  - B. Ending cash balances held at the primary and secondary financial institutions.
  - C. Describe any Investment portfolio managed by an outside advisor or manager, including any securities lending programs, if applicable. Summary discussion of the performance of each portfolio within the Investment Pool performance as of the date of the ending quarterly report.
  - D. Statement of compliance of the Investment Pool to the Investment Policy, or manner in which the portfolio is not in compliance.
  - E. Statement denoting the ability of the City to meet its pool's expenditure requirements for the next six months, or provide an explanation as to why sufficient money shall, or may not, be available.
- 1.7.4 Investment managers shall monitor investments and market conditions and report on a regular and timely basis to the City Treasurer. The City Treasurer will form and act as Chairman of the Investment Advisory Committee ("IAC"). Members of the Committee should include a representative from the City Attorney's office, the City Auditor's office, the City Controller, the Cash/Investment Manager, the Debt Manager and representatives from the

major participants in the Investment Pool. The IAC will meet quarterly or more often if necessary.

## **1.8 Internal Control**

1.8.1 The City Treasurer shall establish a system of internal controls designed to prevent losses of public funds arising from fraud, employee or third party error, misrepresentation of third parties, unanticipated changes in financial markets, or imprudent actions by City employees or agents.

## **1.9 Purchasing Guidelines**

1.9.1 Authorized officers shall purchase and sell securities at the price and execution that is most beneficial to the City, while maintaining the primary objectives of safety, liquidity and yield. Prior to the purchase of any security, the City's liquidity requirements shall be analyzed to determine the optimal investment maturities. Purchase and/or sales shall be done on a competitive basis using the approved list of broker/dealers.

## **2.0 Benchmarks**

2.0.1 Investment Pool performance shall be compared and evaluated against the following benchmarks:

- Short Maturity Portfolio: Three-month Treasury Bill
- Intermediate Maturity Portfolio: ICE BofA Merrill Lynch 1-3 Year US Treasury and Agency Index
- Long Maturity Portfolio: ICE BofA Merrill Lynch 1-5 Year US Treasury and Agency Index

Benchmark indices can be redefined or changed by the City Treasurer due to changes in the markets.

## **3.0 Ethics and conflicts of Interest**

The City Treasurer, along with the members of the Investment Advisory Committee, and other employees involved in the investment decision-making process are required to file annual disclosure statements as required by the Fair Political Practices Commission (FPPC) and, in addition, comply with the City of Long Beach current guidelines of disclosure on annual basis.

## ATTACHMENT B

The City utilizes three NRSROs (Nationally Recognized Statistical Rating Organization) in determining credit quality investment eligibility. The City will consider the credit ratings of Moody's, Standard and Poor's, and Fitch in determining NRSRO eligibility specific to the investment policy. The City of Long Beach and the City's investment adviser will determine specific securities are consistent with the objectives of the POLICY, in addition to the minimum NRSRO credit quality requirement denoted.

#	Type of Investment	Other Restrictions
1.	United States Treasury notes, bonds, bills or certificates of indebtedness or those for which the full faith and credit of the United States are pledged for the payment of principal and interest.	Maximum Maturity: 5 years
2.	Registered state warrants or notes or bonds of the State of California.	Maximum % of Portfolio: 30% Minimum Quality: ST: A1 or equivalent by any NRSRO LT: AA or equivalent by any NRSRO Maximum Maturity: 5 years
3.	Bonds, notes, warrants, or other evidences of indebtedness of any local agency within the State of California.	Maximum % of Portfolio: 30% Minimum Quality: ST: A1 or equivalent by any NRSRO LT: AA or equivalent by any NRSRO Maximum Maturity: 5 years
4.	Federal agency or United States government-sponsored enterprise ("GSE") obligations, participations, or other instruments, including those issued by or fully guaranteed as to principal and interest by federal agencies or United States government-sponsored enterprises.	Maximum Total Callables: 25% Maximum Maturity: 5 years
5.	Bill of exchanges or time drafts drawn on and accepted by a commercial bank, otherwise known as bankers' acceptances.	Maximum % of Portfolio: 40% Maximum Per Issuer: 30% Maximum Maturity: 180 days Minimum Quality: ST: A1 or equivalent by any NRSRO
6.	Commercial Paper	Maximum % of Portfolio*: 40% Maximum Outstanding CP of Issuer: 10% Maximum Per Issuer: 5% Maximum Maturity: 270 days Minimum Quality: ST: A1 or equivalent by any NRSRO  * Government Code Section 53601 (h) provision sunseting on January 1, 2026 permits local agencies with investment assets under management exceeding \$100 million to invest up to maximum 40% of portfolio in Commercial Paper.

**ATTACHMENT B**

#	Type of Investment	Other Restrictions
		<p>Must meet all of the criteria of 1 or of 2:</p> <p>1a. Must be organized and operating in the US as a general corporation</p> <p>1b. Has total assets greater than \$500 million</p> <p>1c. Has debt other than CP, if any, that is rated A or higher by any NRSRO</p> <p>2a. Must be organized within the US as a special purpose corporation, trust or LLC</p> <p>2b. Has program wide enhancements (over collateralization, letter of credit, etc.)</p> <p>2c. Has CP that is rated A1 or higher by an NRSRO</p>
7.	Negotiable certificates of deposits issued by a nationally or state-chartered bank or a state or federal savings and loan association or by a state-licensed branch of a foreign bank.	<p>Maximum Per Issuer: 10%</p> <p>Minimum Quality: ST: A1 or equivalent by any NRSRO</p> <p>Maximum Maturity: 5 years</p>
8.	Time Certificates of Deposit.	<p>The city may invest in non-negotiable time deposits collateralized in accordance with the California Government Code, in those banks and savings and loan associations which meet the requirements for investment in negotiable certificates of deposit.</p>
9.	Repurchase Agreements.	<p>Max Maturity: 90 days</p> <p>Repo Agreement must be covered under a Master Repurchase Agreement</p> <p>Must be a Tri-Party Repo</p> <p>Collateral must be at all times:</p> <ul style="list-style-type: none"> <li>- secured with obligations of the US and Federal agencies (MV of 102% at all times)</li> <li>- valued daily internally or externally</li> </ul> <p>The City shall obtain 1<sup>st</sup> lien and security interest in all collateral</p> <p>Repurchase agreements shall be executed through Primary Broker-Dealers.</p>
10.	Reverse Repurchase Agreements or Securities Lending Agreements.	<p>May be utilized only when all conditions are met:</p> <ol style="list-style-type: none"> <li>1. Security to be sold has been owned and fully paid for at least 30 days prior to sale</li> <li>2. Maximum % of Portfolio: 20%</li> <li>3. Maximum Maturity: 92 days</li> <li>4. Funds from a Reverse Repo or Securities Lending agreement shall not be used to purchase a security that has a maturity of greater than 92 days from the settlement of the sale</li> </ol>

**ATTACHMENT B**

#	Type of Investment	Other Restrictions
		5. Counterparty Minimum Rating: A or equivalent by any NRSRO
11.	Medium-term notes issued by corporations organized and operating within the United States, or by depository institutions licensed by the United States or any state and operating within the United States.	Maximum % of Portfolio: 30% Maximum Per Issuer: 5% Minimum Quality: A or equivalent by all NRSROs. Maximum Maturity: 5 years
12.	Mutual Funds/Money Market Mutual Funds: Shares of beneficial interest issued by diversified management companies investing in the securities and obligations as authorized by the State of California Code 53601 and 53630 et seq.	Maximum % of Portfolio: 20%  Maximum Per Mutual Fund: 10% Maximum Per Money Market Mutual Fund: 20%  Purchase price may not include any commissions charged by these companies.  Companies must have either: <ul style="list-style-type: none"> <li>- the highest ranking or the highest letter and numerical rating provided by not less than two of the nationally recognized rating services;</li> <li>- retained an investment advisor registered or exempt with the Securities and Exchange Commission, with no less than five years of experience investing with assets under management in excess of five hundred million dollars (\$500,000,000) in A) Bond Funds: the securities and obligations authorized by State Code 53601 a-k and m-q; or B) Money Market Mutual Funds.</li> </ul>
13.	State of California Local Agency Investment fund (LAIF).	Maximum investment in LAIF accounts are dependent upon limits established under the Local Agency Investment Fund guidelines.
14.	Mortgage and Asset Backed Securities.	Maximum % of Portfolio: 20%  Minimum Quality: MBS: AA or equivalent by any NRSRO  Minimum Quality: ABS: AA or equivalent by any NRSRO  Maximum Maturity: 5 years  Must be fixed rate.  MBS: Pass-Through securities:

**ATTACHMENT B**

#	Type of Investment	Other Restrictions
		<ul style="list-style-type: none"> <li>- Limited to Government Agency or Government Sponsored issuers</li> <li>- Planned Amortization Classes (PAC) CMOs only</li> <li>ABS:               <ul style="list-style-type: none"> <li>- Publicly offered, generic credit card and automobile receivables only.</li> <li>- Deal size must be at least \$250 million</li> <li>- Tranche size must be at least \$25 million</li> </ul> </li> </ul>
15.	Supranational Securities: US dollar denominated senior unsecured unsubordinated obligations issued or unconditionally guaranteed by the International Bank for Reconstruction and Development (IBRD), International Finance Corporation (IFC), or Inter-American Development Bank (IADB) eligible for purchase and sale within the US.	Maximum % of Portfolio: 30% Maximum Per Issuer: 5% Minimum Quality: AA by any NRSROs. Maximum Maturity: 5 years.

APPENDIX B

CITY OF LONG BEACH

CERTIFICATION OF UNDERSTANDING

The City of Long Beach Investment Policy as approved by the City Council requires that all Financial Institutions and Investment Managers doing business with the City sign a Certification of Understanding acknowledging that:

- 1. You have read and are familiar with the City's Investment Policy and Guidelines as well as applicable Federal and State laws.
- 2. You meet the requirements as outlined in the City's Investment Policy.
- 3. You agree to make every reasonable effort to protect the assets of the City from loss.
- 4. You agree to notify the City in writing of any potential conflicts of interest.
- 5. You agree to notify the City in writing of any changes in personnel with decision-making authority over the City's funds within 24 hours of such event.

Failure to submit a Certification of Understanding shall result in the withdrawal by the City of all funds held by the financial institution or investment manager and the immediate revocation of any rights to act as an agent of the City for the purchase of securities or investment of funds on behalf of the City.

The City Council is committed to the goals of the Community Reinvestment Act (CRA). As part of the certification process for depository institutions, it is requested that you remit evidence of your most recent CRA rating.

SIGNED: \_\_\_\_\_ DATE: \_\_\_\_\_

Print Name and Title: \_\_\_\_\_

After reading and signing this Certification of Understanding please return with any supporting documentation to:

City of Long Beach  
 City Treasurer's Office  
 411 W. Ocean Blvd., 6th Floor,  
 Long Beach, CA 90802

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City of Long Beach use only:

Approved: \_\_\_\_\_ Disapproved: \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Date Notification sent: \_\_\_\_\_ Sent by: \_\_\_\_\_

APPENDIX C

CITY OF LONG BEACH

BROKER-DEALER RECEIPT OF INVESTMENT POLICY

We are in receipt of the City of Long Beach’s Investment Policy.

We have read the policy and understand the provisions and guidelines of the policy. All salespersons covering the City’s account will be made aware of this policy and will be directed to consider its provisions and constraints in selecting investment opportunities to present to the City.

Signed: \_\_\_\_\_  
 Name Name  
 \_\_\_\_\_  
 Title Title

\_\_\_\_\_  
Firm Name

\_\_\_\_\_  
Date

After reading and signing this Receipt of Investment Policy, please return with supporting documentation to:

City of Long Beach  
 City Treasurer’s Office  
 Attention: Investment Manager  
 411 W. Ocean Blvd., 6th floor,  
 Long Beach, CA 90802

City of Long Beach use only:  
 Approved: \_\_\_\_\_ Disapproved: \_\_\_\_\_ Date: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date notification sent: \_\_\_\_\_ Sent by: \_\_\_\_\_

APPENDIX D

CITY OF LONG BEACH

INVESTMENT POLICY DEFINITIONS

**ADJUSTABLE RATE MORTGAGE (ARM):** A mortgage that features predetermined adjustments of the loan interest rate at regular intervals based on an established index. The interest rate is adjusted at each interval to a rate equivalent to the index value plus a predetermined spread, or margin, over the index, usually subject to per-interval and to life-of-loan interest rate and/or payment rate caps.

**ASKED:** The price at which securities are offered from a seller.

**ASSET BACKED SECURITIES:** Securities issued by corporations organized and operating in the United States that are collateralized with some class of assets; credit cards, mortgages, etc. Examples of some issuers are Citibank, Chase Manhattan Bank, American Express.

**BANKERS' ACCEPTANCE (BA):** Time drafts that a bank "accepts" as its financial responsibility as part of a trade finance process. These short-term notes are sold at a discount, and are obligations of the drawer (or issuer - the bank's trade finance client) as well as the bank. Once accepted, the bank is irrevocably obligated to pay the BA upon maturity if the drawer does not.

**BID:** The price offered by a buyer of securities.

**BOND:** A debt security. It is usually issued by government agencies, municipalities and corporations. The purchaser actually lends the entity money and is considered the creditor. The entity is the seller and is considered the debtor or issuer. The issuer agrees to repay the principal amount of the loan at a specified time (maturity). Interest bearing bonds pay interest periodically at a predetermined time. A discounted bond such as a Zero Coupon bond pays no interest. It is sold at a discount from face value (par value) and the investor receives a rate of return through price appreciation and the bond is redeemed at face value.

**BOOK VALUE:** The original cost of the investment, plus accrued interest and amortization of any premium or discount.

**BROKER:** A broker brings buyers and sellers together for a commission.

**CERTIFICATE OF DEPOSIT (CD):** A time deposit with a specific maturity evidenced by a certificate. Large-denomination CDs are typically negotiable (marketable or transferable).

**COLLATERAL:** Securities, evidence of deposit, or other property that a borrower pledges to secure repayment of a loan. Also refers to securities pledged by a bank to secure deposits of public moneys.

**COLLATERALIZED MORTGAGED OBLIGATION SECURITIES (CMOS):** are mortgaged securities consisting of "pools" of real estate properties. These securities are broken into individual pools or sectors by maturity date called **TRANCHES**.

**COMMERCIAL PAPER (CP):** Unsecured promissory notes issued by companies and government entities at a discount. Commercial paper is negotiable, although it is typically held to maturity. The maximum maturity is 270 days, with most CP issued for terms of less than 30 days.

**CONSTANT MATURITY TREASURY (CMT) INDEX:** An index published by the Federal Reserve Board based on the average yield of a range of Treasury securities. Yields on Treasury securities at constant maturity are determined by the U.S. Treasury from the daily yield curve. That is based on the closing market-bid yields on actively traded Treasury securities in the over-the-counter market.

One Year CMT is based on the monthly average yield of a range of Treasury securities, all adjusted to the equivalent of a one-year maturity.

**CUSTODY or SAFEKEEPING:** A service to customers rendered by banks for a fee whereby securities and valuables of all types and descriptions are held in the bank's vaults for protection.

**DEALER:** A dealer, as opposed to a broker, acts as a principal in all transactions, buying and selling for his own account.

**DELIVERY VERSUS PAYMENT:** Delivery of securities with a simultaneous exchange of money for the securities.

**DRAFT or TIME DRAFT:** financial instrument used in international trade, such as a Bankers Acceptance.

**EXTERNAL MANAGERS/ADVISORS:** Professional firms who manage Investment portfolios for Corporations and Public entities. Generally, these firms provide "best practice" reviews and recommendations to the contracting party on portfolio selection, duration and other factors including the impact to the contracting parties' cash flow.

**EXTERNAL PORTFOLIO:** Defined as one or more of the Investment Pool managed by an outside Investment Advisor

**FEDERAL AGENCIES AND U.S. GOVERNMENT SPONSORED ENTERPRISES (AGENCIES or "GSE"):** U.S. Government related organizations, the largest of which are government financial intermediaries assisting specific credit markets (housing, agriculture). They include:

- Federal Home Loan Banks (FHLB)
- Federal Home Loan Mortgage Corporation (FHLMC or "Freddie Mac")
- Federal National Mortgage Association (FNMA or "Fannie Mae")
- Federal Farm Credit Banks (FFCB)
- Tennessee Valley Authority (TVA)

**FINANCIAL FUTURES AND FINANCIAL OPTIONS:** A financial future is a contract to buy or sell a specific standard financial instrument during a specific future month at a price determined in a central, regulated marketplace, such as the Chicago Board of Trade (CBOT), etc. Futures contracts are available for a wide variety of financial instruments. Financial Options on financial futures contracts provide a purchaser the right (but not the obligation) to purchase or sell a given futures contract within a specified time period.

**INTEREST ONLY (I.O.) SECURITIES:** Securities that consist of the interest coupon of a bond. See Principal Only (P.O.).

**INTERNAL MANAGERS:** Are authorized city employees to purchase or sale securities in the Investment Pool. Authorization is the responsibility of the City Treasurer.

**INTERNAL PORTFOLIO:** Defined as one or more of the Investment Pool portfolios managed by City of Long Beach staff.

**ICE – INTERCONTINENTAL EXCHANGE, INC.** (NYSE: ICE): A leading operator of global exchanges and clearing houses and provider of data and listings services. ICE acquired the Bank of America Merrill Lynch's (BAML) fixed income index platform and renamed the BAML indices 'ICE BofAML Indices'

**INVESTMENT ADVISORY COMMITTEE ("IAC"):** The IAC consists of major shareholders of the Investment Pool; a representative from the City Attorney and City Auditor; City Treasurer, City Controller, Debt Manager, Cash and Investment Manager, FM Budget department employee, and designated representatives from the Harbor and Water departments. Members meet quarterly or more often, if necessary, to discuss the performance of the Investment Pool and review recommended changes in strategy, Pool composition and review recommended changes in strategy and pool diversification.

**INVESTMENT POOL:** Defined as the existing City of Long Beach Investment portfolio consisting of a Short-term, Intermediate and Long-term portfolio, each with a different performance benchmark and weighted average maturity guideline.

**INTERMEDIATE MATURITY PORTFOLIO:** A subset of the Investment Pool consisting of approved investments with an average target duration of the ICE BofA Merrill Lynch 1-3 Year US Treasury and Agency Index (plus or minus 10%) based on the City's investment objectives, constraints and risk tolerances.

**LOCAL AGENCY INVESTMENT FUND (LAIF):** The State of California created the Local Agency Investment Fund as an alternative investment for local agencies. The City may invest up to the maximum amount permitted by LAIF per account and fifteen transactions per account per month. The funds are protected under Section 16429.3 of the State of California Government Code and cannot be attached or seized by the State.

**LONG-MATURITY PORTFOLIO:** A subset of the Investment Pool consisting of approved investments with an average target duration of the ICE BofA Merrill Lynch 1-5 Year US Treasury and Agency Index (plus or minus 10%) based on the City's investment objectives, constraints and risk tolerances.

**MARKET VALUE:** The price at which a security is trading and could presumably be purchased or sold.

**MASTER REPURCHASE AGREEMENT:** A written contract covering all future transactions between the parties to repurchase/reverse repurchase agreements that establish each party's rights in the transactions. A master agreement will specify, among other things, the right of the buyer-lender to liquidate the underlying securities in the event of default by the seller-borrower.

**MATURITY:** The date upon which the principal or stated value of an investment becomes due and payable.

**MEDIUM TERM NOTES (MTN):** Interest bearing, continuously offered debt, issued in the nine-month to ten-year maturity range. Deposit notes, like Certificates of Deposit, actually represent an interest bearing deposit at a bank or other depository institution.

**MORTGAGED-BACKED SECURITIES:** A bond or security that is secured by a lien on property, equipment or other real assets.

**NEGOTIABLE CERTIFICATE OF DEPOSIT:** A large denomination (generally \$1 million or more) Certificates of Deposit that can be sold in the secondary market but cannot be cashed in before maturity.

**OFFER:** The price asked by a seller of securities.

**PAR VALUE:** The face value or principal amount payable at maturity.

**PRIMARY DEALER:** A group of government securities dealers who submit daily reports of market activity and positions and monthly financial statements to the Federal Reserve Bank of New York, and are subject to its informal oversight.

**PORTFOLIO GUIDELINES:** Defined as the primary objectives as defined in this policy and the eligible investments to meet the primary objectives. Included in this definition are the policy maximum maturities of any investment; the weighted average maturity of the Investment Pool and other investments as approved by City Council on a case-by-case basis.

**PRINCIPAL ONLY (P.O.) SECURITIES:** A Security that has the interest coupons stripped from the body of the bond. The bond is a non-interest investment and is treated as a discounted/zero security.

**RANGE NOTES:** A security whose interest rate coupon is calculated on a formula that only pays interest if the value of the coupon falls within a prescribed "range" of interest rates.

**REPURCHASE AGREEMENT (RP OR REPO):** A purchase of securities under a simultaneous agreement to sell these securities back at a fixed price on some future date. This is in essence a collateralized investment, whereby the security "buyer" in effect lends the "seller" money for the period of the agreement, and the difference between the purchase price and sale price determining the earnings. Dealers use RP extensively to finance their positions.

**REVERSE REPURCHASE AGREEMENTS:** The opposite or "reverse" of a repurchase agreement. The City puts up securities as collateral to borrow funds. The collateral is "marked to market" by the lending institution daily and if the market value falls below the amount of funds borrowed, the City is required to put up additional funds; either cash and/or securities with a market value equal to or greater than the loan amount. The State of California Government Code limits the maturity term of this investment to 92 days. An additional restriction is a maximum of 20% of the City's funds can be invested in Reverse Repurchase Agreements.

**SECURITIES AND EXCHANGE COMMISSION (SEC):** An agency by Congress to protect investors in securities transactions by administering securities legislation.

**SECURITIES LENDING:** An activity that places investment securities with a contracted counterparty (dealer) who will lend the securities temporarily to another party against a commission. The borrower party is legally obligated to return the same type and amount of securities at the end of a specified period. This action is similar to a reverse repurchase transaction.

**SECURITY RATINGS:** At this time, all references to rating, NRSRO, nationally recognized independent rating service, independent rating service evaluation, national rating agency, nationally recognized statistical-rating organization, nationally recognized rating service will constitute the use of only Standard and Poor's (S&P), Moody's or Fitch's rating scales. Each investment is to comply with the credit quality requirements specified for its class. If split-rated, the lower investment rating will be measured.

**SHORT-MATURITY PORTFOLIO:** A subset of the Investment Pool consisting of approved investments, including LAIF and all cash balances held at Servicing Bank(s). The portfolio has an average target duration of the 90-day U.S. Treasury Bill (plus or minus 10%) based on the City's investment objectives, constraints and risk tolerances.

**SUPRANATIONAL:** A Supranational is a multi-national organization whereby member states transcend national boundaries or interests to share in the decision making to promote economic development in the member countries.

**TRANCHE:** see CMOs

**TREASURY BILLS (T-BILLS):** A non-interest bearing discount security issued by the U.S. Treasury to finance the national debt. Most bills are issued to mature in three months, six months or one year.

**TREASURY NOTES AND BONDS:** Long-term U.S. Treasury securities having initial maturities of one to thirty years.

**VARIABLE RATE SECURITIES:** A security whose coupon interest rate is not fixed but is adjusted periodically according to a prescribed formula or index.

**WARRANTS:** A short-term obligation of a governmental body (as a municipality or state) issued in anticipation of revenues.

**WAM:** Defined as the weighted average maturity of the Investment Pool or each of the component pools.

**YIELD:** The rate of annual income return on an investment expressed as a percentage.

**YIELD TO MATURITY (YTM):** is the rate of return earned on an investment considering all cash flows and timing factors: interest earnings, discounts, and premiums above par.



# INVESTMENT POLICY

Effective January 1, 2020<sup>2</sup>

# **INVESTMENT POLICY**

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## 1.1 Scope

- 1.1.1 In accordance with Resolution No. C-22401, the City Treasurer is authorized to invest the City's funds in accordance with the State of California Government Code, Section 53600, et seq. The objective of the Investment policy ("Policy") is to ensure that the temporarily idle funds of the City of Long Beach are prudently invested to preserve capital and provide necessary liquidity, while maximizing earnings.
- 1.1.2 Investments may only be made as authorized by the State of California Government Code, Section 53600, et seq., the ("Code") and this policy. This policy conforms to the Code as well as to customary standards of prudent investment management. Should the provisions of the Code become more restrictive than those contained herein, such provisions will be considered as immediately incorporated in this policy.
- 1.1.3 This policy sets forth the City's investment of surplus funds in the Investment Pool. Excluded from this policy are guidelines for the investment of Debt Service and Reserve and Deferred Compensation Funds.
- 1.1.4 All authorized officers are governed by this policy, The City Treasurer is responsible for monitoring and ensuring that the total funds subject to this policy remain in compliance with this policy, and shall report to the City Council regularly on compliance.

## 1.2 Investment Objectives

- 1.2.1 The primary objectives, in priority order, of the City's investment activities shall be:
- A. **Safety:** Safety of principal is the foremost objective of the investment program; however, risk is inherent throughout the investment process. The City's investments shall be undertaken in a manner that seeks to maximize the preservation of capital in the overall portfolio and minimize the risk related to capital losses from institutional default, broker-dealer default, or erosion of market value.
  - B. **Liquidity:** The City's Investment Pool will remain sufficiently liquid to meet all operating requirements that might be reasonably anticipated.
  - C. **Yield:** The City shall manage its funds to maximize the return on investments consistent with the two primary objectives of safety and liquidity. The investment goals are to maximize interest income through the prudent implementation of the Policy.
- 1.2.2 It is the intent of this policy to hold investments until maturity, however, if the City's liquidity needs require that investments be sold at a gain or loss, or

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because of a downgrade of credit quality, national or public issues, or to take advantage of market conditions which will result in a gain on reinvestment of the sale proceeds, the security may be sold and the decline in value shall be recorded as a loss.

- 1.2.3 Investments shall be made in the context of the “Prudent Investor” standard which states: “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 in the context of managing an overall portfolio”.
- 1.2.4 Authorized Officers in the management of the Investment Pool shall use the “Prudent Investor” standard. Investment officers acting in accordance with this investment policy, and written portfolio procedures 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 the quarterly investment report to the City Council, and appropriate action is taken to control adverse developments.

### 1.3 Delegation of Authority

- 1.3.1 The City Council shall be the trustee of funds received by the City. In accordance with the Code, Section 53607, and Resolution C-22401, the City Council hereby delegates the authority to invest or reinvest the City's funds, to sell or exchange securities so purchased and to deposit securities for safekeeping to the City Treasurer.
- 1.3.2 The City Treasurer shall establish written procedures for the investment of surplus funds, consistent with this policy, including establishment of appropriate written agreements with financial institutions. The City Treasurer may engage independent investment managers or Advisors to assist in the investment of the City's financial assets.
- 1.3.3 No person may engage in an investment transaction except as provided under the terms of this policy and the procedures established by the City Treasurer.
- 1.3.4 Officers and employees involved in the investment process shall refrain from personal business activity that could conflict with the proper execution of the investment program or which could impair their ability to make impartial investment decisions. All investment personnel shall comply with the reporting requirements of the Fair Political Practices Committee and include an annual filing of a Statement of Economic Interests.

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## 1.4 Permitted and Prohibited Investments

- 1.4.1 All surplus funds which are not required for immediate cash expenditures shall be invested in income producing investments or accounts, in compliance with the provisions and restrictions of this Policy as outlined in Appendix A and as specifically authorized by the Code, Section 53600, et seq.

In order to reduce overall portfolio risk, investments shall be diversified among types of investments, maturities of those investments, issuers and depository institutions. See Appendix A for specific concentration limits by type of investment.

All investment concentration limits and minimum quality guidelines are to be applied at all times.

- 1.4.2 Maturities of individual investments shall be diversified to meet the following objectives:

- A. Investment maturities will be first and foremost based on the City's anticipated cash flow requirements.
- B. No investment instrument shall be purchased which matures more than five years from the settlement date, unless the instrument is specifically approved by the City Council or is approved by the City Council as part of an investment program and such approval must be granted no less than three months prior to the investment.
- C. The maximum weighted average maturity of the Investment Pool shall be three (3) years.

- 1.4.3 This Policy specifically prohibits the investment of any funds subject to this policy in the following securities:

Derivative securities, as defined in Section 53601.6 of the Code as any security that derives its value from an underlying instrument, index, or formula, are prohibited. The derivative universe includes, but is not limited to, futures, options, structured and range notes, securities that could result in zero interest accrual if held to maturity, variable rate, floating rate or inverse floating rate investments, and mortgage derived interest or principal only strips.

Funds may be invested in securities issued by, or backed by, the United States government that could result in zero- or negative-interest accrual if held to maturity, in the event of, and for the duration of, a period of negative market interest rates per Code Section 53601.6(b)(2) as an exception, with sunseting date on January 1, 2026, to previously prohibited investment in any security that could result in a zero-interest accrual if held to maturity.

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**1.5 Selection of Depository Institutions, Investment Managers and Broker-Dealers**

- 1.5.1 To minimize the risk to the City's overall cash and Investment Pool, prudence and due diligence as outlined below shall be exercised with respect to the selection of financial institutions in which the City's funds are deposited or invested.
- A. In selecting Depositories pursuant to the Code, Section 53600, et seq., the credit worthiness, financial stability, and financial history of the institution, as well as the cost and scope of services and yields offered shall be considered. No funds will be deposited in an institution unless that institution has been evaluated by a nationally recognized independent rating service as satisfactory or better.
  - B. Deposits of \$250,000 or less which are insured pursuant to federal law by the Federal Deposit Insurance Corporation (FDIC), or the National Credit Union Administration (NCUA) may be excluded from the independent rating service evaluation requirement above and from the collateralization requirements of Section 1.6.3 of this Policy, at the City Treasurer's discretion.
- 1.5.2 Pursuant to the Code, Section 53601.5, the City and its Investment Managers shall only purchase statutorily authorized investments either from the issuer, from the broker-dealer licensed by the state, as defined in Section 25004 of the Corporations Code, from a member of a federally regulated securities exchange, a national or state-chartered bank, a federal or state association (as defined by Section 5102 of the Financial Code) or from a brokerage firm designated as a primary government dealer by the Federal Reserve Bank. Selection of broker/dealers who the City can purchase or sale investments shall be made by reviewing past performance and contacting references. The City's Investment Advisor, if applicable, will be used to review the information provided and make a recommendation based upon their research.
- A. Internal investment managers will only purchase or sell securities from broker-dealers defined in section 1.5.2 of the Policy and meet the minimum requirements of being registered and licensed by the National Association of Securities Dealers (NASD) and possess an active Series 7 license, an active Series 66 license (or Series 63), submission of a NASD form U4 (employment history) and a current NASD form U5 Disclosure Statement and have completed the City's broker/dealer questionnaire.
  - B. Internal investment managers will only use broker-dealers that have a minimum of three years of experience working for a primary dealer or five years working for a non-primary dealer.

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- 1.5.3 Selections of external investment manager(s)/Advisors to manage a portion of the Investment Pool shall be based on an RFP process, which will include, at the minimum, past performance, stability, financial strength, reputation, area of expertise, and willingness and ability to provide the highest investment return at the lowest cost to the City within the parameters of this Policy and the California Government Code. External investment managers must be registered with the Securities and Exchange Commission (SEC) under the Investment Advisor Act of 1940.
- A. External investment managers may purchase or sell securities from non-Primary Dealers qualified under U.S. Securities and Exchange Commission Rule 15C3-1, the Uniform Net Capital Rule, and provided that the dealer is a certified member of the National Association of Securities Dealers. External investment managers shall submit to the City at least quarterly, a list of the non-Primary Dealers used during the period.
- B. External investment managers must certify in writing that they will purchase securities in compliance with this Policy, City Procedures, and applicable State and Federal laws.
- 1.5.4 Depositories, and external investment managers, who do business with the City, shall sign a Certification of Understanding (see Appendix B). All broker-dealers who do business with the City's internal investment managers shall acknowledge receipt of the City's Investment Policy (see Appendix C).

**1.6 Custody and Safekeeping of Securities and City Funds**

- 1.6.1 Collateral pledged for investments in Repurchase Agreements, shall be held by the City's Custodial Agent or a third-party Trust Department approved by the City Treasurer. Third party transactions will be governed by an Agreement between all parties on the disposition of the pledge securities in the event of default or non-compliance with the terms of the Repurchase Agreement.
- 1.6.2 All purchases and sales of securities in the Investment Pool shall be settled "delivery-versus-payment", using the appropriate delivery system for the security, i.e., Federal Reserve Book entry, Depository Trust Company ("DTC") or physical delivery to the appropriate party designated financial institution or Trust Company. The City portfolio shall be held in safekeeping by a third-party custodian, acting as agent for the City under the terms of a custody agreement executed by the custodian and the City. Exception to this policy are, mutual fund investments, and Local Agency Investment Fund, pledged collateral, or other Local Government Investment Pools

Funds deposited by the City shall be secured by a Depository in compliance with the requirements of the Code, Section 53652.

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- 1.6.3 Investment securities in bearer form such as Negotiable Certificates of Deposit and Bankers' Acceptances shall be held in a qualified safekeeping financial institution or Trust Department designated by the City.

**1.7 Reports and Communications**

- 1.7.1 The City Treasurer is responsible for ensuring compliance with all applicable Local, State, and Federal laws governing the reporting of investments made with public funds. The Investment Pool will be monitored for compliance. Non-compliance issues will be included in the quarterly City Council report as stated in Section 1.7.3 of this Policy.
- 1.7.2 The City Treasurer shall annually submit a statement of investment policy to the City Council for approval. The existing approved policy will remain in effect until the City Council approves the recommended statement of investment policy.
- 1.7.3 The City Treasurer shall render a quarterly cash, investment, and transaction report to the City Manager (referred to as the Chief Executive Officer by the Code, Section 53646, b), the City Auditor and the City Council within a reasonable time period, but no later than 90 days following the end of the quarter covered by the report, subject to Investment Advisory and City Council meeting schedules. The report shall include a description of the City's funds, investments, or programs that are under the management of the contracted parties, including lending programs. The report shall include at a minimum:
- A. A detail report listing the type of investment, name of the issuer, maturity date, par value and cost, accrued interest and market value.
  - B. Ending cash balances held at the primary and secondary financial institutions.
  - C. Describe any Investment portfolio managed by an outside advisor or manager, including any securities lending programs, if applicable. Summary discussion of the performance of each portfolio within the Investment Pool performance as of the date of the ending quarterly report.
  - D. Statement of compliance of the Investment Pool to the Investment Policy, or manner in which the portfolio is not in compliance.
  - E. Statement denoting the ability of the City to meet its pool's expenditure requirements for the next six months, or provide an explanation as to why sufficient money shall, or may not, be available.
- 1.7.4 Investment managers shall monitor investments and market conditions and report on a regular and timely basis to the City Treasurer. The City Treasurer will form and act as Chairman of the Investment Advisory Committee ("IAC"). Members of the Committee should include a representative from the City

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Attorney's office, the City Auditor's office, the City Controller, the Cash/Investment Manager, the Debt Manager and representatives from the major participants in the Investment Pool. The IAC will meet quarterly or more often if necessary.

## **1.8 Internal Control**

- 1.8.1 The City Treasurer shall establish a system of internal controls designed to prevent losses of public funds arising from fraud, employee or third party error, misrepresentation of third parties, unanticipated changes in financial markets, or imprudent actions by City employees or agents.

## **1.9 Purchasing Guidelines**

- 1.9.1 Authorized officers shall purchase and sell securities at the price and execution that is most beneficial to the City, while maintaining the primary objectives of safety, liquidity and yield. Prior to the purchase of any security, the City's liquidity requirements shall be analyzed to determine the optimal investment maturities. Purchase and/or sales shall be done on a competitive basis using the approved list of broker/dealers.

## **2.0 Benchmarks**

- 2.0.1 Investment Pool performance shall be compared and evaluated against the following benchmarks:

- Short Maturity Portfolio: Three-month Treasury Bill
- Intermediate Maturity Portfolio: ICE BofA Merrill Lynch 1-3 Year US Treasury and Agency Index
- Long Maturity Portfolio: ICE BofA Merrill Lynch 1-5 Year US Treasury and Agency Index

Benchmark indices can be redefined or changed by the City Treasurer due to changes in the markets.

## **3.0 Ethics and conflicts of Interest**

The City Treasurer, along with the members of the Investment Advisory Committee, and other employees involved in the investment decision-making process are required to file annual disclosure statements as required by the Fair Political Practices Commission (FPPC) and, in addition, comply with the City of Long Beach current guidelines of disclosure on annual basis.

Summary of Authorized Investment Types & Restrictions

The City utilizes three NRSROs (Nationally Recognized Statistical Rating Organization) in determining credit quality investment eligibility. The City will consider the credit ratings of Moody's, Standard and Poor's, and Fitch in determining NRSRO eligibility specific to the investment policy. The City of Long Beach and the City's investment adviser will determine specific securities are consistent with the objectives of the POLICY, in addition to the minimum NRSRO credit quality requirement denoted.

#	Type of Investment	Other Restrictions
1.	United States Treasury notes, bonds, bills or certificates of indebtedness or those for which the full faith and credit of the United States are pledged for the payment of principal and interest.	Maximum Maturity: 5 years
2.	Registered state warrants or notes or bonds of the State of California.	Maximum % of Portfolio: 30% Minimum Quality: ST: A1 <u>or equivalent</u> by any NRSRO —————LT: AA <u>or equivalent</u> by any NRSRO Maximum Maturity: 5 years
3.	Bonds, notes, warrants, or other evidences of indebtedness of any local agency within the State of California.	Maximum % of Portfolio: 30% Minimum Quality: ST: A1 <u>or equivalent</u> by any NRSRO —————LT: AA <u>or equivalent</u> by any NRSRO Maximum Maturity: 5 years
4.	Federal agency or United States government-sponsored enterprise ("GSE") obligations, participations, or other instruments, including those issued by or fully guaranteed as to principal and interest by federal agencies or United States government-sponsored enterprises.	Maximum Total Callables: 25% Maximum Maturity: 5 years
5.	Bill of exchanges or time drafts drawn on and accepted by a commercial bank, otherwise known as bankers' acceptances.	Maximum % of Portfolio: 40% Maximum Per Issuer: 30% Maximum Maturity: 180 days Minimum Quality: ST: A1 <u>or equivalent</u> by any NRSRO
6.	Commercial Paper	Maximum % of Portfolio*: <u>40% -25%</u> Maximum Outstanding CP of Issuer: 10% Maximum Per Issuer: 5% Maximum Maturity: 270 days Minimum Quality: ST: A1 <u>or equivalent</u> by any NRSRO  <u>* Government Code Section 53601 (h) provision sunsetting on January 1, 2026 permits local agencies with investment assets under management exceeding \$100 million to invest up to maximum 40% of portfolio in Commercial Paper.</u>

Summary of Authorized Investment Types & Restrictions

#	Type of Investment	Other Restrictions
		<p>Must meet all of the criteria of 1 or of 2:</p> <p>1a. Must be organized and operating in the US as a general corporation</p> <p>1b. Has total assets greater than \$500 million</p> <p>1c. Has debt other than CP, if any, that is rated A or higher by any NRSRO</p> <p>2a. Must be organized within the US as a special purpose corporation, trust or LLC</p> <p>2b. Has program wide enhancements (over collateralization, letter of credit, etc.)</p> <p>2c. Has CP that is rated A1 or higher by an NRSRO</p>
7.	Negotiable certificates of deposits issued by a nationally or state-chartered bank or a state or federal savings and loan association or by a state-licensed branch of a foreign bank.	<p>Maximum Per Issuer: 10%</p> <p>Minimum Quality: ST: A1 <u>or equivalent</u> by any NRSRO</p> <p>Maximum Maturity: 5 years</p>
8.	Time Certificates of Deposit.	<p>The city may invest in non-negotiable time deposits collateralized in accordance with the California Government Code, in those banks and savings and loan associations which meet the requirements for investment in negotiable certificates of deposit.</p>
9.	Repurchase Agreements.	<p>Max Maturity: 90 days</p> <p>Repo Agreement must be covered under a Master Repurchase Agreement</p> <p>Must be a Tri-Party Repo</p> <p>Collateral must be at all times:</p> <ul style="list-style-type: none"> <li>- secured with obligations of the US and Federal agencies (MV of 102% at all times)</li> <li>- valued daily internally or externally</li> </ul> <p>The City shall obtain 1<sup>st</sup> lien and security interest in all collateral</p> <p>Repurchase agreements shall be executed through Primary Broker-Dealers.</p>
10.	Reverse Repurchase Agreements or Securities Lending Agreements.	<p>May be utilized only when all conditions are met:</p> <ol style="list-style-type: none"> <li>1. Security to be sold has been owned and fully paid for at least 30 days prior to sale</li> <li>2. Maximum % of Portfolio: 20%</li> <li>3. Maximum Maturity: 92 days</li> <li>4. Funds from a Reverse Repo or Securities Lending agreement shall not be used to purchase a security that has a maturity of</li> </ol>

Summary of Authorized Investment Types & Restrictions

#	Type of Investment	Other Restrictions
		greater than 92 days from the settlement of the sale 5. Counterparty Minimum Rating: A <u>or equivalent</u> by any NRSRO
11.	Medium-term notes issued by corporations organized and operating within the United States, or by depository institutions licensed by the United States or any state and operating within the United States.	Maximum % of Portfolio: 30% Maximum Per Issuer: 5% Minimum Quality: A <u>or equivalent</u> by all NRSROs. Maximum Maturity: 5 years
12.	Mutual Funds/Money Market Mutual Funds: Shares of beneficial interest issued by diversified management companies investing in the securities and obligations as authorized by the State of California Code 53601 and 53630 et seq.	Maximum % of Portfolio: 20%  Maximum Per Mutual Fund: 10% Maximum Per Money Market Mutual Fund: 20%  Purchase price may not include any commissions charged by these companies.  Companies must have either: <ul style="list-style-type: none"> <li>- the highest ranking or the highest letter and numerical rating provided by not less than two of the nationally recognized rating services;</li> <li>- retained an investment advisor registered or exempt with the Securities and Exchange Commission, with no less than five years of experience investing with assets under management in excess of five hundred million dollars (\$500,000,000) in A) Bond Funds: the securities and obligations authorized by State Code 53601 a-k and m-q; or B) Money Market Mutual Funds.</li> </ul>
13.	State of California Local Agency Investment fund (LAIF).	Maximum investment in LAIF accounts are dependent upon limits established under the Local Agency Investment Fund guidelines.
14.	Mortgage and Asset Backed Securities.	Maximum % of Portfolio: 20%  Minimum Quality: MBS: AA <u>or equivalent</u> by any NRSRO  Minimum Quality: ABS: AA <u>or equivalent</u> by any NRSRO  Maximum Maturity: 5 years  Must be fixed rate.  MBS: Pass-Through securities:

Summary of Authorized Investment Types & Restrictions

#	Type of Investment	Other Restrictions
		<ul style="list-style-type: none"> <li>- Limited to Government Agency or Government Sponsored issuers</li> <li>- Planned Amortization Classes (PAC) CMOs only</li> <li>ABS:                             <ul style="list-style-type: none"> <li>- Publicly offered, generic credit card and automobile receivables only.</li> <li>- Deal size must be at least \$250 million</li> <li>- Tranche size must be at least \$25 million</li> </ul> </li> </ul>
15.	Supranational Securities: US dollar denominated senior unsecured unsubordinated obligations issued or unconditionally guaranteed by the International Bank for Reconstruction and Development (IBRD), International Finance Corporation (IFC), or Inter-American Development Bank (IADB) eligible for purchase and sale within the US.	Maximum % of Portfolio: 30% Maximum Per Issuer: 5% Minimum Quality: AA by any NRSROs. Maximum Maturity: 5 years.

APPENDIX B

CITY OF LONG BEACH

CERTIFICATION OF UNDERSTANDING

The City of Long Beach Investment Policy as approved by the City Council requires that all Financial Institutions and Investment Managers doing business with the City sign a Certification of Understanding acknowledging that:

- 1. You have read and are familiar with the City's Investment Policy and Guidelines as well as applicable Federal and State laws.
- 2. You meet the requirements as outlined in the City's Investment Policy.
- 3. You agree to make every reasonable effort to protect the assets of the City from loss.
- 4. You agree to notify the City in writing of any potential conflicts of interest.
- 5. You agree to notify the City in writing of any changes in personnel with decision-making authority over the City's funds within 24 hours of such event.

Failure to submit a Certification of Understanding shall result in the withdrawal by the City of all funds held by the financial institution or investment manager and the immediate revocation of any rights to act as an agent of the City for the purchase of securities or investment of funds on behalf of the City.

The City Council is committed to the goals of the Community Reinvestment Act (CRA). As part of the certification process for depository institutions, it is requested that you remit evidence of your most recent CRA rating.

SIGNED: \_\_\_\_\_ DATE: \_\_\_\_\_

Print Name and Title: \_\_\_\_\_

After reading and signing this Certification of Understanding please return with any supporting documentation to:

City of Long Beach  
 City Treasurer's Office  
 411 W. Ocean Blvd., 6th Floor,  
 Long Beach, CA 90802

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City of Long Beach use only:  
 Approved: \_\_\_\_\_ Disapproved: \_\_\_\_\_ Date: \_\_\_\_\_  
 Signature: \_\_\_\_\_

Date Notification sent: \_\_\_\_\_ Sent by: \_\_\_\_\_

APPENDIX C

CITY OF LONG BEACH

BROKER-DEALER RECEIPT OF INVESTMENT POLICY

We are in receipt of the City of Long Beach’s Investment Policy.

We have read the policy and understand the provisions and guidelines of the policy. All salespersons covering the City’s account will be made aware of this policy and will be directed to consider its provisions and constraints in selecting investment opportunities to present to the City.

Signed: \_\_\_\_\_  
 Name \_\_\_\_\_ Name \_\_\_\_\_  
 \_\_\_\_\_  
 Title \_\_\_\_\_ Title \_\_\_\_\_

\_\_\_\_\_  
Firm Name

\_\_\_\_\_  
Date

After reading and signing this Receipt of Investment Policy, please return with supporting documentation to:

City of Long Beach  
 City Treasurer’s Office  
 Attention: Investment Manager  
 411 W. Ocean Blvd., 6th floor,  
 Long Beach, CA 90802

City of Long Beach use only:  
 Approved: \_\_\_\_\_ Disapproved: \_\_\_\_\_ Date: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date notification sent: \_\_\_\_\_ Sent by: \_\_\_\_\_

APPENDIX D

CITY OF LONG BEACH

INVESTMENT POLICY DEFINITIONS

**ADJUSTABLE RATE MORTGAGE (ARM):** A mortgage that features predetermined adjustments of the loan interest rate at regular intervals based on an established index. The interest rate is adjusted at each interval to a rate equivalent to the index value plus a predetermined spread, or margin, over the index, usually subject to per-interval and to life-of-loan interest rate and/or payment rate caps.

**ASKED:** The price at which securities are offered from a seller.

**ASSET BACKED SECURITIES:** Securities issued by corporations organized and operating in the United States that are collateralized with some class of assets; credit cards, mortgages, etc. Examples of some issuers are Citibank, Chase Manhattan Bank, American Express.

**BANKERS' ACCEPTANCE (BA):** Time drafts that a bank "accepts" as its financial responsibility as part of a trade finance process. These short-term notes are sold at a discount, and are obligations of the drawer (or issuer - the bank's trade finance client) as well as the bank. Once accepted, the bank is irrevocably obligated to pay the BA upon maturity if the drawer does not.

**BID:** The price offered by a buyer of securities.

**BOND:** A debt security. It is usually issued by government agencies, municipalities and corporations. The purchaser actually lends the entity money and is considered the creditor. The entity is the seller and is considered the debtor or issuer. The issuer agrees to repay the principal amount of the loan at a specified time (maturity). Interest bearing bonds pay interest periodically at a predetermined time. A discounted bond such as a Zero Coupon bond pays no interest. It is sold at a discount from face value (par value) and the investor receives a rate of return through price appreciation and the bond is redeemed at face value.

**BOOK VALUE:** The original cost of the investment, plus accrued interest and amortization of any premium or discount.

**BROKER:** A broker brings buyers and sellers together for a commission.

**CERTIFICATE OF DEPOSIT (CD):** A time deposit with a specific maturity evidenced by a certificate. Large-denomination CDs are typically negotiable (marketable or transferable).

**COLLATERAL:** Securities, evidence of deposit, or other property that a borrower pledges to secure repayment of a loan. Also refers to securities pledged by a bank to secure deposits of public moneys.

**COLLATERALIZED MORTGAGED OBLIGATION SECURITIES (CMOS):** are mortgaged securities consisting of "pools" of real estate properties. These securities are broken into individual pools or sectors by maturity date called **TRANCHES**.

**COMMERCIAL PAPER (CP):** Unsecured promissory notes issued by companies and government entities at a discount. Commercial paper is negotiable, although it is typically held to maturity. The maximum maturity is 270 days, with most CP issued for terms of less than 30 days.

**CONSTANT MATURITY TREASURY (CMT) INDEX:** An index published by the Federal Reserve Board based on the average yield of a range of Treasury securities. Yields on Treasury securities at constant maturity are determined by the U.S. Treasury from the daily yield curve. That is based on the closing market-bid yields on actively traded Treasury securities in the over-the-counter market.

One Year CMT is based on the monthly average yield of a range of Treasury securities, all adjusted to the equivalent of a one-year maturity.

**CUSTODY or SAFEKEEPING:** A service to customers rendered by banks for a fee whereby securities and valuables of all types and descriptions are held in the bank's vaults for protection.

**DEALER:** A dealer, as opposed to a broker, acts as a principal in all transactions, buying and selling for his own account.

**DELIVERY VERSUS PAYMENT:** Delivery of securities with a simultaneous exchange of money for the securities.

**DRAFT or TIME DRAFT:** financial instrument used in international trade, such as a Bankers Acceptance.

**EXTERNAL MANAGERS/ADVISORS:** Professional firms who manage Investment portfolios for Corporations and Public entities. Generally, these firms provide "best practice" reviews and recommendations to the contracting party on portfolio selection, duration and other factors including the impact to the contracting parties' cash flow.

**EXTERNAL PORTFOLIO:** Defined as one or more of the Investment Pool managed by an outside Investment Advisor

**FEDERAL AGENCIES AND U.S. GOVERNMENT SPONSORED ENTERPRISES (AGENCIES or "GSE"):** U.S. Government related organizations, the largest of which are government financial intermediaries assisting specific credit markets (housing, agriculture). They include:

- Federal Home Loan Banks (FHLB)
- Federal Home Loan Mortgage Corporation (FHLMC or "Freddie Mac")
- Federal National Mortgage Association (FNMA or "Fannie Mae")
- Federal Farm Credit Banks (FFCB)
- Tennessee Valley Authority (TVA)

**FINANCIAL FUTURES AND FINANCIAL OPTIONS:** A financial future is a contract to buy or sell a specific standard financial instrument during a specific future month at a price determined in a central, regulated marketplace, such as the Chicago Board of Trade (CBOT), etc. Futures contracts are available for a wide variety of financial instruments. Financial Options on financial futures contracts provide a purchaser the right (but not the obligation) to purchase or sell a given futures contract within a specified time period.

**INTEREST ONLY (I.O.) SECURITIES:** Securities that consist of the interest coupon of a bond. See Principal Only (P.O.).

**INTERNAL MANAGERS:** Are authorized city employees to purchase or sale securities in the Investment Pool. Authorization is the responsibility of the City Treasurer.

**INTERNAL PORTFOLIO:** Defined as one or more of the Investment Pool portfolios managed by City of Long Beach staff.

**ICE – INTERCONTINENTAL EXCHANGE, INC.** (NYSE: ICE): A leading operator of global exchanges and clearing houses and provider of data and listings services. ICE acquired the Bank of America Merrill Lynch's (BAML) fixed income index platform and renamed the BAML indices 'ICE BofAML Indices'

**INVESTMENT ADVISORY COMMITTEE ("IAC"):** The IAC consists of major shareholders of the Investment Pool; a representative from the City Attorney and City Auditor; City Treasurer, City Controller, Debt Manager, Cash and Investment Manager, FM Budget department employee, and designated representatives from the Harbor and Water departments. Members meet quarterly or more often, if necessary, to discuss the performance of the Investment Pool and review recommended changes in strategy, Pool composition and review recommended changes in strategy and pool diversification.

**INVESTMENT POOL:** Defined as the existing City of Long Beach Investment portfolio consisting of a Short-term, Intermediate and Long-term portfolio, each with a different performance benchmark and weighted average maturity guideline.

**INTERMEDIATE MATURITY PORTFOLIO:** A subset of the Investment Pool consisting of approved investments with an average target duration of the ICE BofA Merrill Lynch 1-3 Year US Treasury and Agency Index (plus or minus 10%) based on the City's investment objectives, constraints and risk tolerances.

**LOCAL AGENCY INVESTMENT FUND (LAIF):** The State of California created the Local Agency Investment Fund as an alternative investment for local agencies. The City may invest up to the maximum amount permitted by LAIF per account and fifteen transactions per account per month. The funds are protected under Section 16429.3 of the State of California Government Code and cannot be attached or seized by the State.

**LONG-MATURITY PORTFOLIO:** A subset of the Investment Pool consisting of approved investments with an average target duration of the ICE BofA Merrill Lynch 1-5 Year US Treasury and Agency Index (plus or minus 10%) based on the City's investment objectives, constraints and risk tolerances.

**MARKET VALUE:** The price at which a security is trading and could presumably be purchased or sold.

**MASTER REPURCHASE AGREEMENT:** A written contract covering all future transactions between the parties to repurchase/reverse repurchase agreements that establish each party's rights in the transactions. A master agreement will specify, among other things, the right of the buyer-lender to liquidate the underlying securities in the event of default by the seller-borrower.

**MATURITY:** The date upon which the principal or stated value of an investment becomes due and payable.

**MEDIUM TERM NOTES (MTN):** Interest bearing, continuously offered debt, issued in the nine-month to ten-year maturity range. Deposit notes, like Certificates of Deposit, actually represent an interest bearing deposit at a bank or other depository institution.

**MORTGAGED-BACKED SECURITIES:** A bond or security that is secured by a lien on property, equipment or other real assets.

**NEGOTIABLE CERTIFICATE OF DEPOSIT:** A large denomination (generally \$1 million or more) Certificates of Deposit that can be sold in the secondary market but cannot be cashed in before maturity.

**OFFER:** The price asked by a seller of securities.

**PAR VALUE:** The face value or principal amount payable at maturity.

**PRIMARY DEALER:** A group of government securities dealers who submit daily reports of market activity and positions and monthly financial statements to the Federal Reserve Bank of New York, and are subject to its informal oversight.

**PORTFOLIO GUIDELINES:** Defined as the primary objectives as defined in this policy and the eligible investments to meet the primary objectives. Included in this definition are the policy maximum maturities of any investment; the weighted average maturity of the Investment Pool and other investments as approved by City Council on a case-by-case basis.

**PRINCIPAL ONLY (P.O.) SECURITIES:** A Security that has the interest coupons stripped from the body of the bond. The bond is a non-interest investment and is treated as a discounted/zero security.

**RANGE NOTES:** A security whose interest rate coupon is calculated on a formula that only pays interest if the value of the coupon falls within a prescribed "range" of interest rates.

**REPURCHASE AGREEMENT (RP OR REPO):** A purchase of securities under a simultaneous agreement to sell these securities back at a fixed price on some future date. This is in essence a collateralized investment, whereby the security "buyer" in effect lends the "seller" money for the period of the agreement, and the difference between the purchase price and sale price determining the earnings. Dealers use RP extensively to finance their positions.

**REVERSE REPURCHASE AGREEMENTS:** The opposite or "reverse" of a repurchase agreement. The City puts up securities as collateral to borrow funds. The collateral is "marked to market" by the lending institution daily and if the market value falls below the amount of funds borrowed, the City is required to put up additional funds; either cash and/or securities with a market value equal to or greater than the loan amount. The State of California Government Code limits the maturity term of this investment to 92 days. An additional restriction is a maximum of 20% of the City's funds can be invested in Reverse Repurchase Agreements.

**SECURITIES AND EXCHANGE COMMISSION (SEC):** An agency by Congress to protect investors in securities transactions by administering securities legislation.

**SECURITIES LENDING:** An activity that places investment securities with a contracted counterparty (dealer) who will lend the securities temporarily to another party against a commission. The borrower party is legally obligated to return the same type and amount of securities at the end of a specified period. This action is similar to a reverse repurchase transaction.

**SECURITY RATINGS:** At this time, all references to rating, NRSRO, nationally recognized independent rating service, independent rating service evaluation, national rating agency, nationally recognized statistical-rating organization, nationally recognized rating service will constitute the use of only Standard and Poor's (S&P), Moody's or Fitch's rating scales. Each investment is to comply with the credit quality requirements specified for its class. If split-rated, the lower investment rating will be measured.

**SHORT-MATURITY PORTFOLIO:** A subset of the Investment Pool consisting of approved investments, including LAIF and all cash balances held at Servicing Bank(s). The portfolio has an average target duration of the 90-day U.S. Treasury Bill (plus or minus 10%) based on the City's investment objectives, constraints and risk tolerances.

**SUPRANATIONAL:** A Supranational is a multi-national organization whereby member states transcend national boundaries or interests to share in the decision making to promote economic development in the member countries.

**TRANCHE:** see CMOs

**TREASURY BILLS (T-BILLS):** A non-interest bearing discount security issued by the U.S. Treasury to finance the national debt. Most bills are issued to mature in three months, six months or one year.

**TREASURY NOTES AND BONDS:** Long-term U.S. Treasury securities having initial maturities of one to thirty years.

**VARIABLE RATE SECURITIES:** A security whose coupon interest rate is not fixed but is adjusted periodically according to a prescribed formula or index.

**WARRANTS:** A short-term obligation of a governmental body (as a municipality or state) issued in anticipation of revenues.

**WAM:** Defined as the weighted average maturity of the Investment Pool or each of the component pools.

**YIELD:** The rate of annual income return on an investment expressed as a percentage.

**YIELD TO MATURITY (YTM):** is the rate of return earned on an investment considering all cash flows and timing factors: interest earnings, discounts, and premiums above par.

Date: February 4, 2021

To: John Gross, Director of Financial Management

From: David Nakamoto, City Treasurer   
Cassandra Tan, Cash and Investment Manager

Subject: **Reinstating Investments in Corporate Securities**

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### **Recommendation**

Treasury Bureau staff recommends the reinstatement of the City's investment in corporate securities by an allocation of 20% in the Long Maturity portfolio and for it to be managed by Chandler Asset Management. As the City's investment pool is weighted heavily in government treasury and agency securities for maximum safety in preservation of capital, the Corporate securities would provide the City necessary tools to manage diversification and liquidity risk, as well as, the flexibility to manage and match varying cash flows.

### **Background**

The City of Long Beach's investment program is governed by California Government Code ("Code"), Section 53600, et seq. and the City's Investment Policy annually adopted by City Council. Both documents set forth the following primary objectives of the City's investment activities, in order of priority: 1) safety of principal; 2) sufficient liquidity to meet all operating requirements; and 3) maximization of return consistent with the two primary objectives of safety and liquidity. The Government Code and the City's Investment Policy permit up to 30 percent of the portfolio to be invested in corporate bonds with a maximum maturity of 5 years and a minimum rating of "A" by a Nationally Recognized Statistical Rating Organization (NRSRO).

In September 2008, Lehman Brothers Holdings, Inc., (rated A1/P1, the second highest short-term credit rating available by Standard and Poor's (S&P) and Moody's) filed for bankruptcy, forcing major losses to investment portfolios worldwide. The City owned \$20 million of commercial paper, of which \$10.1 million have been recovered as of close of Fiscal Year 2020. Due to the economic uncertainty of the global financial crisis, the City had sought additional safety by not exercising its corporate investment authority. The City chose to concentrate their investments only in U.S. Treasuries, U.S. Agencies and Money Market funds when the corporate securities market become illiquid.

Prior to the financial market crisis, many investors, including the City, relied on the opinions of rating agencies (Moody's, S&P, and Fitch) to measure credit quality for making investment decisions regarding corporate securities. When Lehman Brothers defaulted on their commercial paper in 2008, the City, along with many other investors, learned that the credit ratings issued by rating agencies were not necessarily reliable measures of the credit strength of an issuer. In response to the losses the City incurred and the lack of a reliable credit analysis process, the City discontinued purchases of corporate securities in 2008.

The City addressed the challenges by making key changes in the investment process. In 2009, the City engaged Chandler Asset Management (Chandler), a SEC-registered investment adviser, for strategic investment advisory services and to actively manage approximately \$400 million of the long-term investment portfolio. The firm has a dedicated team of investment experts, sophisticated research resources and a disciplined process for managing investment risk. They employ a rigorous, proprietary credit analysis process to identify stable and improving credits, and the early detection of weak and deteriorating issuers.

Since 2009, Chandler has worked closely with the City's Treasury staff to design and implement conservative investment strategies designed to protect the assets of the City, provide necessary liquidity for cash disbursements and enhance earnings once the first two objectives are satisfied. In designing and implementing strategies for the City, Chandler's investment team gives careful consideration and analysis to the risk/reward relationship of overall strategies as well as individual securities. Interest-rate risk and credit risk are the primary risks evaluated and managed in the City's portfolio. The risk management process includes both qualitative and quantitative aspects. Chandler continues to successfully navigate credit cycles using a disciplined, proprietary process for evaluating and monitoring the credit strength of corporate issuers that minimizes its reliance on rating agencies beyond assuring compliance with investment policies and governing laws.

Chandler will adhere to the credit criteria established in the City's Investment Policy. Chandler will constantly monitor the credit risk and performance of each investment to ensure the investments continue to meet the criteria established in the City's policy. Chandler will liquidate those investments where the credit ratings deteriorate or under-performed.

Chandler's disciplined methods and tools to help protect the City's assets and the potential benefits for the City, are the key considerations regarding the recommendation to re-authorize the purchase of corporate securities. The City of Long Beach will benefit from these tools and processes in the higher duration portfolio Chandler manages for the City.

### **Summary**

In the past ten years, securities issued by the United States Treasury and other government agencies has contracted materially, resulting in demand far exceeding supply which diminished yield and value for investors. This has led to California Government Code section 53601 to be moderately expanded in recent years to help broaden the investment opportunity for governmental investors who are required to adhere to the tenets of California Government Code: safety, liquidity, and return.

The City's investment pool is heavily weighted toward the government Treasury and Agency securities sector. Staff recommends to further diversify the investment by an allocation to the Corporate securities sector in the Long Maturity portfolio by starting with 5% and gradually increase to a total of 20% in the high grade corporate securities over an intermediate time period and managed by Chandler Asset Management. Although the Government Code and the City's Investment Policy allows up to 30 percent, a diversification of 20% allocation allows the City to reduce overall portfolio risk while maintaining its investment pool rating at AA+F by Standard & Poor (S&P). For the annual S&P credit quality review of the City's pooled

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investments, the Chandler team and City Treasury staff modeled a hypothetical portfolio with a 20% allocation to the Corporate sector within the long-term portfolio managed by Chandler on behalf of the City. By replicating the S&P credit criteria model with the addition of the corporate exposure, the rating of the aggregate pooled investments notably remained consistent with the existing rating of AA+f.

Due to the moderate exposure to corporates in the aggregate portfolio, via limiting the exposure to the Chandler long-term strategy, staff recommends adding corporate securities into the long-term portfolio as a prudent first step in enhancing the investment opportunity set for the City of Long Beach.

Please approve this subject to review and concurrence by the investment committee. I will then review this with the investment committee. I will then implement it after concurrence by them.

APPROVED:



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JOHN GROSS DIRECTOR  
FINANCIAL MANAGEMENT DEPARTMENT