



YAMHILL COUNTY INVESTMENT POLICY

Adopted by Board Order
Effective Date: October 2021



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Treasurer
October 2021

B.O. 21-432

Contents

1. Introduction	2
2. Governing Authority	2
3. Scope.....	2
4. General Objectives.....	2
5. Standards of Care.....	3
6. Transaction Counterparties, Investment Advisers, and Depositories	4
7. Administration and Operations	8
8. Suitable and Authorized Investments.....	9
9. Investment Parameters.....	10
10. Investment of Proceeds from Debt Issuance	14
11. Investment of Reserve of Capital Improvement Funds	14
12. Guideline Measurement and Adherence.....	14
13. Reporting and Disclosure	15
14. Policy Maintenance and Considerations.....	16
15. Documents Used and Maintained in Conjunction with this Policy.....	16

Yamhill County Investment Policy—Amended

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1. Introduction

The Investment Policy defines the parameters within which funds are to be invested by Yamhill County (County). This policy also formalizes the framework, pursuant to **ORS 294.135**, for the County's activities to ensure effective and judicious management of funds within the scope of this policy.

2. Governing Authority

The County's investment program shall be operated in conformance with the Oregon Revised Statutes and applicable federal law. Specifically, the investment policy is written in conformance with ORS 294.035, 294.040, 294.135, 294.145, and 294.810. All funds within the scope of this policy are subject to regulations established by the State of Oregon. Any revisions or extensions of these sections of the ORS shall be assumed to be part of this Investment Policy immediately upon being enacted.

3. Scope

This policy applies to activities of the County with regard to investing assets of operating funds, capital funds, bond proceeds, bond reserve funds, revenue funds, debt service funds, assessment funds, and stewardship funds. Investment of employees' retirement funds, deferred compensation funds and other funds are not covered by this policy. The amount of funds falling within the scope of this policy over the next three years is expected to range between \$20 million and \$90 million.

4. General Objectives

The primary objectives, in order of priority, of investment activities shall be:

a. Preservation of Investment Capital

Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The goal is to mitigate credit risk and interest rate risk.

b. Liquidity

The Investment Portfolio shall remain sufficiently liquid to meet all reasonably anticipated operating requirements. Furthermore, the portfolio should consist largely of securities with active secondary or resale markets. A portion of the portfolio will be placed in the Oregon Short-Term Fund, which offers next day liquidity. Where possible and prudent, the portfolio should be structured so that investments mature concurrently with anticipated demands.

c. Return

The Investment Portfolio shall be designated with the objective of attaining a market rate of return throughout budgetary and economic cycles, taking into consideration the safety and liquidity needs of the portfolio. Although return consists of both principal return (gains and losses due to market value fluctuations) and income return (yield), this policy discourages active trading and turnover of investments. Investments should generally be held to maturity.

5. Standards of Care

a. Prudence

The standard of prudence to be used by investment officials shall be the “prudent person” standard and shall be applied in the context of managing an overall portfolio. Investment officers acting in accordance with written procedures and this investment policy and exercising due diligence shall be relieved of personal responsibility for an individual security’s credit risk or market price changes, provided deviations from expectations are reported and appropriate action is taken to control adverse developments within a timely fashion as defined in this policy.

The “prudent person” standard 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.”

b. Ethics and Conflict of Interest

Officers and employees involved in the investment process shall refrain from personal activity that could conflict with the proper execution and management of the investment program or that could impair their ability to make impartial decisions. Employees and investment officials shall disclose any material interests in financial institutions with which they conduct business. Disclosure shall be made to the governing body. They shall further disclose any personal financial/investment positions that could be related to the performance of the Investment Portfolio. Employees and officers shall refrain from undertaking personal investment transactions with the same individual with whom business is conducted on behalf of the County. Officers and employees shall, at all times, comply with the Oregon Government Standards and Practices code of ethics set forth in ORS Chapter 244.

c. Delegation of Authority and Responsibility

i. Governing Body

The County’s Board of Commissioners will retain fiduciary responsibility for invested funds. The governing body will receive reports pursuant to and with sufficient detail to comply with ORS 294.085 and 294.155.

ii. Delegation of Authority

Authority to manage investments within the scope of this policy and operate the investment program in accordance with established written procedures and internal

controls is granted to the County Treasurer, hereinafter referred to as the Investment Officer, and derived from the following: ORS 294.035, 294.053, 294.125, 294.145, and 294.810. In the Treasurer's absence, the Deputy Treasurer has the authority to act as the County's investment officer.

No person may engage in an investment transaction except as provided under the terms of this policy and the procedures established by the Investment Officer. The Investment Officer shall be responsible for all transactions undertaken and shall establish a system of controls to regulate the activities of subordinate officials.

All participants in the investment process shall seek to act responsibly as custodians of the public trust. No officer or designee may engage in investment transactions except as provided under the terms of this policy and supporting procedures.

iii. Investment Advisory Committee

An Investment Advisory Committee shall be created by Board Order. It shall be comprised of up to 7 voting members: the County Treasurer (who shall serve as Chair), the liaison commissioner, and up to 5 citizens selected by the Treasurer who have public investment knowledge. The citizens members shall be appointed by the Board of Commissioners. Such appointment shall not be unreasonably withheld. Ex officio members are the two commissioners who do not serve as liaison to the County Treasurer, the County Administrator, and the Deputy County Treasurer. The committee shall provide guidance to the Investment Officer on investments and review investment performance at least quarterly.

iv. Investment Advisers

The County, through the Investment Officer and with the approval of the Board of Commissioners, may engage the services of one or more external investment managers to assist in the management of the County's Investment Portfolio in a manner consistent with this investment policy. Investment Advisers may be hired on a non-discretionary basis. All investment transactions by approved investment advisers must be pre-approved in writing by the Investment Officer and compliant with this investment policy. If the County hires an investment adviser to provide investment management services, the adviser is authorized to transact with its direct dealer relationships on behalf of the County.

6. Transaction Counterparties, Investment Advisers, and Depositories

a. Broker/Dealers

In the event the County elects to make investments that require broker/dealers, the Investment Officer shall determine which broker/dealer firms and registered representatives are authorized for the purposes of investing funds within the scope of this investment policy. The following minimum criteria must be met before broker/dealer firms and affiliated registered representatives are authorized to execute investment transactions. The Investment Officer may impose more stringent criteria.

- i. A list will be maintained of approved broker/dealer firms and affiliated registered representatives.
- ii. Broker/dealer firms must meet the following minimum criteria:
 - Be registered with the Securities and Exchange Commission (SEC).
 - Be registered with the Financial Industry Regulatory Authority (FINRA).
 - Provide most recent audited financials.
 - Provide FINRA Focus Report filings.
- iii. Approved broker/dealer employees who execute transactions with the County the following minimum criteria:
 - Be a registered representative with the FINRA.
 - Be licensed by the State of Oregon.
 - Provide a certification (in writing) of having read, understood, and agreed to comply with the most current version of this investment policy.
- iv. The Investment Officer may want to establish policy for engaging broker/dealer firms and registered representatives that are more restrictive than stated in this policy. Additional requisites or due diligence items may include but not be limited to:
 - Positive references from at least three other local government clients.
 - As part of periodic due diligence review, inquiries with other local government clients with regard to their recent experience with broker /dealer firms or registered representatives and any change in relationship status.
 - Requirement that approved registered representatives provide notification within 30 days of any formal investigations or disciplinary actions initiated by federal or state regulators.
 - Requirement that prospective registered representatives have an established history of advising local governments with similar amounts of assets under management.
- v. Periodic (at least annual) review of all authorized broker/dealers and their respective authorized registered representatives will be conducted by the Investment Officer. Factors to be considered would be:
 - Pending investigations by security regulators.
 - Significant changes in net capital.
 - Pending customer arbitration cases.
 - Regulatory enforcement actions.

Professional conduct, regulatory filing history, and registration status for any registered broker/dealer firm or for an individually registered representative can be researched at the FINRA website using the FINRA BrokerCheck® service.

➤ www.finra.org/investors/ToolsCalculators/BrokerCheck/

Additional information (including state-issued enforcement orders) on brokers and registered representatives licensed by the State of Oregon may also be obtained from the Oregon Department of Consumer and Business Services Division of Finance and Corporate Securities.

➤ www.cbs.state.or.us/external/dfcs/

b. Investment Advisers

A list may be maintained of approved advisers selected through a process of due diligence.

- i. The following items are required for all approved investment advisers:
 - The investment adviser firm must be registered with the Securities and Exchange Commission (SEC) or licensed by the State of Oregon. (Note: Investor adviser firms with assets under management greater than \$100 million must be registered with the SEC, otherwise the firm must be licensed by the State of Oregon.)
 - All investment adviser firm representatives conducting investment transactions on behalf of the County must be registered representatives with FINRA.
 - All investor adviser firm representatives conducting investment transactions on behalf of the County must be licensed by the state of Oregon.
 - Certification, by all of the adviser representatives conducting investment transactions on behalf of the entity, of having read, understood, and agreed to comply with this investment policy.
- ii. A periodic (at least annual) review of all authorized investment advisers will be conducted by the Investment Officer to determine their continued eligibility within the portfolio guidelines. Factors to consider would be:
 - Pending investigations by securities regulators.
 - Significant changes in net capital.
 - Pending customer arbitration cases.
 - Regulatory enforcement actions.

Professional conduct and regulatory filing history for any investment adviser representative can be researched on the SEC Investment Adviser Public Disclosure website.

The SEC's Investment Adviser Public Disclosure website provides access to the registration form ("Form ADV") that the adviser filed. Form ADV contains information about an investment adviser and its business operations. Additionally, it contains disclosure about certain disciplinary events involving the adviser and its key personnel.

The website allows users to search for an individual investment adviser representative and view that individual's professional background and conduct, including current registrations, employment history, and disclosures about certain disciplinary events involving the individual.

➤ http://www.adviserinfo.sec.gov/IAPD/Content/Search/iapd_Search.aspx

- iii. The Investment Officer may want to establish guidelines or policy for engaging investment advisers' services that are more restrictive than stated in this policy. Additional requisites or due diligence items may include:
 - Positive references from at least three other local government clients of a prospective investment adviser firm.

- As part of a periodic due diligence review, inquire with other local government clients of approved investment advisers with regard to their recent experiences with the adviser and any changes in the relationship status.
- Requirement that approved investment advisers provide notification within 30 days of a relationship termination by an Oregon-based local government.
- Requirement that approved investment adviser provide notification within 30 days of any formal investigation or disciplinary actions initiated by federal or state regulators.
- Requirement that prospective investment advisers have an established history of advising local governments with similar amounts of assets under management.

c. Depositories

All financial institutions who desire to become depositories must be qualified Oregon Depositories pursuant to ORS Chapter 295.

d. Competitive Transactions

- i. The Investment Officer shall obtain and document competitive bid information on all investments purchased or sold in the secondary market. Competitive bids or offers should be obtained, when possible, from at least three separate brokers/financial institutions or through the use of a nationally recognized trading platform. The Investment Officer will select the quote which satisfies the investment objectives of the Investment Portfolio within the parameters of this policy.
- ii. In the instance of a security for which there is no readily available competitive bid or offering on the same specific issue, then the Investment Officer shall document quotations for comparable or alternative securities.
- iii. When purchasing original issue instrumentality securities, no competitive offerings will be required, as all dealers in the selling group offer those securities at the same original issue price. However, the Investment Officer is encouraged to document quotations on comparable securities.
- iv. If an investment adviser provides investment management services, the adviser must retain documentation of competitive pricing execution on each transaction and provide upon request.
- v. Nothing in this policy will prevent the Investment Officer from immediately purchasing an investment that suddenly becomes available and meets an existing need. It is recognized that investments can both become available and sell-out in a matter of minutes. The Investment Officer shall use professional judgment before buying an investment without competitive quotes.

7. Administration and Operations

a. Delivery vs. Payment

All trades of marketable securities will be executed (cleared and settled) by delivery vs. payment (DVP) to ensure that securities are deposited in the County's safekeeping institution prior to the release of funds.

b. Third-Party Safekeeping

Marketable securities will be held by an independent third-party safekeeping institution selected by the County. All marketable securities will be evidenced by safekeeping receipts in the County's name. Upon request, the safekeeping institution shall make available a copy of its Statement on Standards for the Attestation Engagements (SSAE) No. 16.

c. Internal Controls

The Investment Officer and the County Administrator are responsible for establishing and maintaining an adequate internal control structure designed to reasonably assure that invested funds are invested within the parameters of this Investment Policy and protected from loss, theft, or misuse. Specifics for the internal controls shall be documented in writing. The established control structure shall be reviewed and updated periodically.

The concept of reasonable assurance recognizes that the cost of a control should not exceed the benefits likely to be derived, and that the valuation of costs and benefits requires estimates and judgments by management.

The internal controls shall address the following points at a minimum:

- Compliance with Investment Policy.
- Control of collusion.
- Separation of transaction authority from accounting and record keeping.
- Custodial safekeeping.
- Avoidance of physical delivery of securities whenever possible and addressing of control requirements for physical delivery where necessary.
- Clear delegation of authority to subordinate staff members.
- Confirmation of transactions for investments and wire transfers in written or digitally verifiable electronic form.
- Dual authorizations of wire and automated clearing house (ACH) transfers.
- Staff training.
- Review, maintenance, and monitoring of security procedures, both manual and automated.

An external auditor shall provide an annual independent review to assure compliance with Oregon state law and County policies and procedures.

8. Suitable and Authorized Investments

a. Investment Types

The following investments are permitted pursuant to ORS 294.035, 294.040 and 294.810. Bank demand deposits in qualified depository institutions are considered cash vehicles, not investments, and are therefore outside the scope of this policy.

- U.S. Treasury Obligations: U.S. Treasury and other government obligations that carry the full faith and credit guarantee of the United States for the timely payment of principal and interest.
- U.S. Agency Senior Debenture Obligations: Senior Debenture Obligations of U.S. Federal agencies and instrumentalities or U.S. government-sponsored enterprises (GSE).
- Bank Time Deposits/Savings Accounts/Certificates of Deposits.
- Corporate Indebtedness
 - Commercial paper issued under the authority of section 3(a)(3) of the Securities Act of 1933.
 - Corporate bonds.
- Repurchase Agreements.
- Banker's Acceptances.
- Oregon Short-Term Fund.
- Debt obligations of the agencies and instrumentalities of the State of Oregon and its political subdivisions.
- Debt obligations of the states of California, Idaho, and Washington and political subdivisions of those states.

b. Approval of Permitted Investments

If additional types of securities are considered for investment, per Oregon state statute, they will not be eligible for investment until this Policy has been amended and the amended version adopted by the County.

c. Bank Deposits and Savings Accounts

All bank deposits, time deposits, certificates of deposits, and savings accounts, shall be held in qualified Oregon depositories in accordance with ORS Chapter 295.

d. Prohibited Investments

i. Private Placement or "144A" Securities

Private placement or SEC Rule 144A securities are not allowed. SEC Rule 144A securities include commercial paper issued under section 4(2) of the Securities Act of 1933.

ii. U.S. Agency Mortgage-backed Securities

U.S. Agency Mortgage-backed securities, such as those securities by FNMA and FHLMC, are not allowed.

iii. Securities Lending

The County shall not lend securities nor directly participate in a securities lending.

e. Repurchase Agreements

- i. ORS 294.035(3)(j) requires repurchase collateral to be limited in maturity to three years and priced according to percentages prescribed by written policy of the Oregon Investment Council or the Oregon Short-Term Fund Board.
- ii. ORS 294.135(2) limits the maximum term of any repurchase agreement to 90 days.
- iii. Repurchase agreements must meet the margins adopted by the OSTF Board. Current margins are:
 - U.S. Treasury Securities: 102%
 - U.S. Agency Discount and Coupon Securities: 102%
 - Mortgage-backed and Other: 103%

9. Investment Parameters

a. Credit Risk

Credit risk is the risk that a security or a portfolio will lose some or all of its value due to a real or perceived change in the ability of the issuer to repay its debt. Credit risk will be mitigated by the following guidelines:

- i. Diversification – It is the policy of the County to diversify its investments. Where appropriate, exposure will be limited by security type, maturity, issuance, issuer, and security type. Allowed security types and investment exposure limitations are detailed in the table below.
- ii. Investment Credit Ratings – Investments must have a rating from at least one of the following nationally recognized statistical ratings organizations (NRSROs), as detailed in the table below: Moody's Investor Service, Standard and Poor's, and Fitch Rating Service. Ratings used to apply the guidelines below should be investment-level ratings and not issuer-level ratings.

EXPOSURE CONSTRAINTS

Issue Type	Maximum % Holdings	Minimum Ratings Standard & Poor's	Minimum Ratings Moody's	Minimum Ratings Fitch
U.S. Treasury Obligations	100%	N/A	N/A	N/A
U.S. Agency Securities	100%	N/A	N/A	N/A
Per Agency (Senior Obligations Only)	50%			
Oregon Short-Term Fund/LGIP	Maximum allowed per ORS 294.810 Or 100%	N/A	N/A	N/A
Corporate Debt (Total)	35%			
Corporate Commercial Paper	25%			
Per Issuer	5%	A1	P1	F1
Corporate Bonds	35%			
Per Issuer	5%	AA-	Aa3	AA-
Repurchase Agreements	5%			
Banker's Acceptance	25%	A1	P1	F1
Bank Time Deposits/Savings	50%			
Accounts/Certificates of Deposit	25%			
Per Institution				
Municipal Debt (Total)	35%	AA-	Aa3	AA-
State of Oregon	25%	A	A2	A
States of Idaho, CA, WA	25%	AA	Aa2	AA

- iii. Restrictions on Issuers with Prior Default History- Per ORS 294.040, the bonds of issuers listed in ORS 294.035(3)(a) to (3)(c) may be purchased only if there has been no default in payment of or the interest on the obligations of the issuing county, port, school district, or city for a period of five years next preceding the date of the investment.
- iv. Portfolio Credit Rating – The minimum weighted average credit rating of the portfolio's rated investments shall be AA/Aa2/AA by Standard and Poor's, Moody's Investor's Service, and Fitch Ratings Service respectively.

	Moody's INVESTORS SERVICE	FitchRatings	S&P Global Ratings	Rating Grade Description
Investment Grade	Aaa	AAA	AAA	Highest credit quality, lowest level of credit risk
	Aa1	AA+	AA+	Very high credit quality with very low credit risk
	Aa2	AA	AA	
	Aa3	AA-	AA-	
	A1	A+	A+	High credit quality with low credit risk
	A2	A	A	
	A3	A-	A-	
	Baa1	BBB+	BBB+	Good credit quality with moderate credit risk
	Baa2	BBB	BBB	
	Baa3	BBB-	BBB-	
Speculative Grade	Ba1	BB+	BB+	Speculative with substantial credit risk
	Ba2	BB	BB	
	Ba3	BB-	BB-	
	B1	B+	B+	Highly speculative with high credit risk
	B2	B	B	
	B3	B-	B-	
	Caa1	CCC+	CCC+	Substantial credit risk with default as a real possibility
	Caa2	CCC	CCC	
	Caa3	CCC-	CCC-	
	Ca	CC	CC	Very high levels of credit risk with default either occurring or about to occur
	C	C	C	Default or default-like process has begun
	SD	RD		Selective Default (SD): Issuers have defaulted on one or more specific issues but are expected to meet their other payment obligations. Restricted Default (RD): Issuers have missed one or more payments but are not under supervision for reorganization or liquidation.
	D	D		Default: Issuers are unlikely to pay their obligations and have likely entered into bankruptcy filings, administration, receivership, liquidation or other formal winding up procedures.

b. Liquidity Risk

Liquidity risk is the risk that an investment may not be easily marketable or redeemable.

The following strategies will be employed to mitigate liquidity risks:

- i. The value of at least 25% of funds available for investing will be invested in the Oregon Short-Term Fund with a qualified depository institution or investments maturing within 180 days to provide sufficient liquidity for expected disbursements.
- ii. Funds in excess of liquidity requirements are allowed for investments maturing in greater than 180 days. However, longer-term investments tend to be less liquid than shorter-term investments. Portfolio investment maturities will be limited as follows:

Total Portfolio Maturity Constraints	
Maturity Constraints	Minimum % of Total Portfolio
Under 30 days	Lesser of 10% or 2 months net operating expenditures
Under 180 days	Lesser of 25% or 4 months net operating expenditures
Under 18 months	35%
Under 36 months	60%
Under 60 months	100%

Due to fluctuations in the surplus funds balance, maximum percentages for a particular issuer, investment type, or maturity may be exceeded at a point in time subsequent to the purchase of a particular security. Securities need not be liquidated to realign the portfolio.

In no event shall the Investment Portfolio (non LGIP investments) be greater than the sum of the Total Portfolio (LGIP and non LGIP investments) minus the 18-month maturity constraint (35% of the Total Portfolio).

- iii. Reserve or Capital Improvement Project monies may be invested in securities exceeding the maximum term if the maturities of such investments are made to coincide as nearly as practicable with the expected use of the funds.
- iv. Larger issuance sizes enhance liquidity as there are likely to be a greater number of investors. Issuance sizes above a minimum amount qualify a municipal debt bond issuance for index eligibility. Index-eligible bonds have a significantly larger investor base, which improves liquidity.
- v. Limiting investments in a specific debt issuance improves secondary market liquidity by ensuring there are other owners of the issuance.

Issue Type	Maximum % of Issuance* (Par)
U.S. Agency Securities	50%
Corporate Debt (Total)	
Corporate Commercial Paper	25%
Corporate Bonds	25%
Municipal Bonds	50%
*The par amount issued under a single CUSIP	

c. Interest Rate Risk

Longer-term investments have the potential to achieve higher returns, but are likely to exhibit higher market value volatility due to the changes in the general level of interest rates over the life of the investment(s). Interest rate risk will be mitigated by providing adequate liquidity for short-term cash needs and by making longer-term investments only with funds that are not needed for current cash flow purposes. Certain types of securities, including variable rate securities, securities with principal paydowns prior to maturity, and securities with embedded options, will affect the interest rate risk profiles of the portfolio differently in different interest rate environments. The following strategies will be employed to control and mitigate adverse changes in the market value of the portfolio due to changes in interest rates:

- i. Where feasible and prudent, investment maturities should be matched with expected cash outflows to mitigate market risk.
- ii. To the extent feasible, investment maturities not matched with cash outflows, including liquidity investments under eighteen months, should be staggered to mitigate reinvestment risk.
- iii. No commitments to buy or sell securities may be made more than 14 days prior to the anticipated settlement date or receive a fee other than interest for future deliveries.
- iv. The maximum percent of callable securities in the portfolio shall be 35%.

- v. The maximum stated final maturity of individual securities in the portfolio shall be five years, except as otherwise stated in this policy.
- vi. The maximum portfolio average weighted maturity exclusive of Reserve or Capital Improvement Project monies measured with stated final maturity shall not exceed 4 years. Callable bonds will be calculated using their final maturity dates rather than their callable dates. LGIP and other money market investments shall be excluded from the average weighted maturity calculation.

10. Investment of Proceeds from Debt Issuance

- a. Investment of bond proceeds is restricted under bond covenants that may be more restrictive than the investment parameters included in this policy. Bond proceeds shall be invested in accordance with the parameters of this policy and the applicable bond covenants and tax laws.
- b. Funds from bond proceeds and amounts held in a bond payment reserve or proceeds fund may be invested pursuant to ORS 294.052. Investment of bond proceeds are typically not invested for resale and are maturity matched with outflows. Consequently, surplus funds within the scope of ORS 294.052 are not subject to this policy's liquidity risk constraints within section 10(b).

11. Investment of Reserve of Capital Improvement Funds

Pursuant to ORS 294.135(1)(b), reserve or capital improvement monies may be invested in securities exceeding five years when the funds in question are being accumulated for an anticipated use that will occur more than 18 months after the funds are invested; then, upon the approval of the governing body of the County, the maturity of the investment or investments made with the funds may occur when the funds are expected to be used.

12. Guideline Measurement and Adherence

- a. Guideline Measurement
Guideline measurements will use market value of investments.
- b. Guideline Compliance
 - i. If the portfolio falls outside of compliance with the adopted policy guidelines or is being managed inconsistently with this policy, the Investment Officer shall bring the portfolio back into compliance in a prudent manner and as soon as prudently feasible.
 - ii. Violations of portfolio guidelines as a result of transactions, actions to bring the portfolio back into compliance, and reasoning for actions taken to bring the portfolio back into compliance shall be documented and reported to the County Board of Commissioners.

- iii. Due to the fluctuation in the aggregate surplus funds balance, maximum percentages for a particular issuer or investment type may be exceeded at a point in time. Securities need not be liquidated to realign the portfolio; however, consideration should be given to this matter when future purchases are made to ensure that appropriate diversification is maintained.

13. Reporting and Disclosure

a. Compliance

The Investment Officer shall prepare a report at least quarterly that allows the Board of Commissioners to ascertain whether investment activities during the reporting period have conformed to the investment policy. The report should be provided to the investment oversight body. The report will include, at a minimum, the following:

The report will be placed on the Yamhill County Treasurer's website. The investment report shall include at least all of the following:

- Portfolio Summary: Weighted average maturity, yield on market and cost, average credit rating, asset allocation by type, maturity distribution, and aggregate book and market values
- Individual Investments: Issuer, CUSIP or identifier, maturity date, coupon, par value, book value, market value, est. annual income, unrealized gain/loss, yield., and credit rating
- Investment Income: A listing of investment income for the reporting period
- Performance Information: Yield comparisons, book return, total return, etc.
- Transaction Information: A listing of the period's transactions.

The Investment Officer shall also maintain records, subject to audit, of all investment transactions including the names of all obligors, descriptions of all securities purchased and sold (including dates of issue, acquisition and maturity, coupon, price, yield, and gain or loss on ultimate disposition), name of the broker/dealer involved in each transaction, custodian of each security, and the sale or maturity of each security.

Violations of portfolio guidelines or non-compliance issues that occurred during the prior period or that are outstanding. This report should also note actions (taken or planned) to bring the portfolio back into compliance as soon as practical.

The report should include comparisons of investment returns to relevant alternative investments and comparative bond indexes. The performance of the portfolio shall be compared to the performance of alternative investments such as available certificates of deposit, the Oregon Short-Term Fund, and U.S. Treasury rates.

b. Audits

Management shall establish an annual process of independent review by the external auditor to ensure compliance with internal controls. Such audit will include tests deemed appropriate by the auditor.

14. Policy Maintenance and Considerations

a. Review

The investment policy shall be reviewed at least annually within 90 days of the end of the County's fiscal year to ensure its consistency with the overall objectives of preservation of principal, liquidity, and return, and its relevance to current law and financial and economic trends.

b. Exemptions

The investments held prior to the adoption of this policy shall be exempted from the requirements of this policy. At maturity or liquidation, such monies shall be reinvested as provided by this policy.

c. Policy Adoption and Amendments

This investment policy and any modifications to this policy must be formally approved by Board Order by the County Board of Commissioners.

This policy must be submitted to the Oregon Short-Term Fund (OSTF) Board for review if:

- i. This policy allows maturities beyond 18 months, unless the funds are being accumulated for a specific purpose, including future construction projects; and if, upon approval by the County's Board of Commissioners, the maximum maturity date matches the anticipated use of the funds (ORS 294.135(1)(b) and ORS 294.135(3)); AND
- ii. Either this policy has never been submitted to the OSTF Board for comment, or material changes have been made since the last review by the OSTF Board.

Regardless of whether this policy is submitted to the OSTF Board for comment, this policy shall be re-submitted not less than annually to the County's Board of Commissioners for approval.

15. Documents Used and Maintained in Conjunction with this Policy

- Relevant investment statutes and ordinances
- Listing of authorized broker/dealers and financial institutions
- Safekeeping agreements
- Broker confirmation and safekeeping receipts
- Safekeeping monthly statements
- Investment Internal Control Procedures