California State Treasurer’s Office

Investment Policy

Pooled Money Investment Account

January 19, 2022
All state money held by the State Treasurer in treasury trust accounts, and all money in the State Treasury is appropriated for the purpose of investment and deposit as provided in Section 16480 et. seq. of the Government Code.

GOAL I. PORTFOLIO SAFETY/DIVERSIFICATION

The pool will be managed to ensure the safety of the portfolio by investing in high quality securities and by maintaining a mix of securities that will provide reasonable assurance that no single investment or class of investments will have a disproportionate impact on the total portfolio.

OBJECTIVE: In addition to the safety provided by investing in high quality securities, the safety of the portfolio is enhanced three ways by maintaining a diverse, prudent mix of investments: 1) Spreading investments over different investment types minimizes the impact any one industry/investment class can have on the portfolio; 2) Spreading investments over multiple credits/issuers within an investment type minimizes the credit exposure of the portfolio to any single firm/institution; and 3) Spreading investments over various maturities minimizes the risk of portfolio depreciation due to a rise in interest rates.

POLICY: The portfolio shall contain a sufficient number and diversity of marketable securities so that a reasonable portion of the portfolio can be readily converted to cash without causing a material change in the value of the portfolio. Limitation and eligibility as to specific investments are to be determined by the Pooled Money Investment Board in the case of Commercial Paper, the Treasurer’s Investment Committee in the case of new dealer authorizations, and the State Treasurer’s Investment Division in all other matters.

GOAL II. LIQUIDITY

The pool will be managed to ensure that normal cash needs, as well as scheduled extraordinary cash needs can be met. Further, adequate liquidity shall be maintained to ensure the unforeseen cash needs, whether ordinary or extraordinary.

OBJECTIVE: The pool will maintain a “cash flow generated” portfolio balance sufficient to cover specifically the one-month prepared cash forecast, as well as generally the six-month prepared cash forecast. Further, sufficient marketable treasuries will be maintained to cover unforeseen withdrawals or delayed deposits.

POLICY: First priority is to maintain specific calendar liquidity, as dictated by the most recent cash forecast. Second priority is the maintenance of Treasury Bill positions adequate to meet unscheduled needs. Final consideration would be given to “other” investments deemed appropriate to portfolio maintenance, enhancement, or restructuring.
GOAL III. RATE OF RETURN

Pooled investments and deposits shall be made in such a way as to realize the maximum return consistent with safe and prudent treasury management.

**OBJECTIVE:** The rate of return will be maintained on a consistent level representative of current market yield direction.

**POLICY:** Sales gains/losses will not be incurred to the point of radically altering the final quarterly apportionment rate. Significant sales gains will be offset for restructuring purposes to maintain consistent current return, as well as maximizing future portfolio performance. Significant sales losses shall be incurred only by consent of the Treasurer, or when sufficient profits negate the alteration of the apportionment rate. Range bonds and inverse yielding securities are examples of the types of investments which are precluded by the above stated objective.

**CONFORMANCE**

All of the foregoing goals, objectives and policies shall be observed by the Director of Investments or his/her designee and monitored and reviewed continually by the Treasurer or his/her designee.
STATEMENT OF PORTFOLIO MANAGEMENT GUIDELINES

The State Treasurer's Investment Division has set forth a general declaration of portfolio goals, objectives and policies. Following are various guidelines necessary to the good faith observance of these policies.

I. GUIDELINES FOR MAINTAINING SAFETY/DIVERSIFICATION

There are few statutory limitations placed on individual categories of authorized investments. However, this does not entitle the investment staff to "carte blanche" participation in these security types. In the absence of direct statutory limitations, the "prudent person rule" shall be utilized by the investment staff. As market conditions change, altering credit risk, marketability, yield spreads, and securities availability, application of this rule shall govern any investment decision. This application shall be discussed as soon as time permits with the Director of Investments. At the Director of Investments determination, the situation may be discussed with the Treasurer or his/her designee.

Following are various considerations/limitations as they pertain to specific investment types:

A. **U.S. Treasury Securities**

   1) Maximum maturity: Statutory: None. Policy: 5 years.

   2) Maximum par value, total portfolio: None.

   3) Maximum par value per name: None.

   4) Maximum par value per maturity: None.

   5) Credit: Full faith and credit of the Federal Government.

Treasury Bills are maintained for liquidity, trading, and yield enhancement as the underlying security in a Reverse Repurchase transaction. Treasury strips and full coupon securities are purchased for average maturity preservation, liquidity, and trading.

B. **Agencies (Federal and Supranational)**

   1) Maximum maturity: Statutory: None. Policy: 5 years.

   2) Maximum par value, total portfolio: None.

   3) Maximum par value per name: None.

   4) Maximum par value per maturity: None.
5) Credit: Despite there being no statutory limitations concerning this category, prudent investment practice necessitates constant credit analysis of certain issuing entities. Although there exists an implicit or explicit government guarantee of the various issues, market perception may limit the liquidity of these securities.

C. **Bankers Acceptances (Domestic and Foreign)**

1) Maximum maturity: Statutory: None.  
   Policy: 180 days.

2) Maximum par value, total portfolio: None.

3) Maximum par value per name: None.

4) Maximum par value per maturity: None.

5) Credit: A banker's acceptance is a money market instrument and, like most money markets, it is safe and liquid, particularly when the paying bank has a high credit rating.

D. **Certificates of Deposits**

1) Maximum maturity: Statutory: None.  
   Policy: 5 years.

2) Maximum par value, total portfolio: None.

3) Maximum par value per name: None.

4) Maximum par value per maturity: None.

5) Credit: Institutions must be rated average or better, by a nationally recognized statistical rating organization utilized by the State Treasurer’s Investment Division and must pass a credit evaluation by the investment staff. This evaluation may include a review of such criteria as geographic location, market perception, management factors, and overall fiscal soundness. Liquidity as far as both credit risk and marketability in the secondary level are addressed. There must be a market for the name in which at least three major dealers will bid or offer at a given moment.

The approved investments will be posted to the STO website.
E. **Collateralized Time Deposits**

1) **Maximum maturity:**  
   - Statutory: None.  
   - Policy: 1 year.

2) **Maximum par value, total portfolio:** None.

3) **Maximum par value per name:**  
   - Statutory: Shall not exceed the net worth of the institution.  
   - Policy: Shall not exceed the net worth of the institution or an amount considered prudent; whichever is less.

4) **Maximum par value per maturity:** None.

5) **Location:** Institutions must be headquartered in the State of California.

6) **Credit:** Institutions must be rated average or better, by a nationally recognized statistical rating organization utilized by the State Treasurer's Investment Division and must pass a credit evaluation by the investment staff. This evaluation may include a review of such criteria as geographic location, market perception, loan diversity, management factors, overall fiscal soundness and the Community Reinvestment Act Rating. If, while holding a pool deposit, an institution is downgraded below acceptable levels by the rating agencies, the following steps shall be taken:

   a) Notify the Centralized Treasury and Securities Management Division, Collateral Management Section to monitor collateral closely.

   b) Review financials and update credit report.

   c) Determine the appropriate plan of action which may include early termination of the time deposit, or allow the time deposit to mature.

7) **Collateral must comply with Government Code Section 16500 (et seq. (bank deposits)) and Section 16600 (et. seq. (savings and loans association and credit union deposits)).**
F. **Commercial Paper**

1) Maximum maturity:  
   - Statutory: 270 days.  
   - Policy: Same.

2) Maximum par value, total portfolio:  
   - Statutory: 30% of the current portfolio.  
   - Policy: Same.

3) Maximum par value per name:  
   - Statutory: 10% of outstanding.  
   - Policy: Same.

4) Maximum par value per maturity: None.

5) Credit: Commercial paper eligible for investment under this subdivision must be rated “Prime” quality as defined by a nationally recognized statistical rating organization utilized by the State Treasurer’s Investment Division and must be issued by a federally or state-chartered bank or a state-licensed branch of a foreign bank, corporation, trust, special purpose corporation, or limited liability company approved by the Pooled Money Investment Board. Furthermore, these entities must be either (1) organized and operating within the United States and have total assets in excess of five hundred million dollars ($500,000,000) or (2) must be organized within the United States and have programwide credit enhancements including, but not limited to, overcollateralization, letters of credit or surety bonds.

   The approved investments will be posted to the STO website.

G. **Corporate Bonds/Notes**

1) Maximum maturity:  
   - Statutory: None.  
   - Policy: 5 years.

2) Maximum par value, total portfolio: None.

3) Maximum par value per name: None.

4) Maximum par value per maturity: None.

5) Credit: Securities eligible for investment under this subdivision must be issued by corporations (including banks) organized and operating within the United States and shall be within the top three ratings of a nationally recognized statistical rating organization utilized by the State Treasurer’s Investment Division.

   The approved investments will be posted to the STO website.
H. Repurchases (RP) and Reverse Repurchases (RRP)

1) Maximum maturity: Statutory: None.  
   Policy: 1 year.

2) Maximum par value, total portfolio: Statutory: None.  
   Policy: RRP is limited to 10% of the current portfolio.

3) Maximum par value per name: None.

4) Maximum par value per maturity: None.

5) Credit:
   a) Must have on file, a signed Security Loan Agreement and/or General Repurchase Agreement. Repurchase Agreement may be either STO General Agreement or Bond Market Association Standard Agreement.
   b) Repurchases and reverse repurchases are only done with long established and/or well-capitalized broker-dealers.

I. Negotiable Order of Withdrawal (NOW) Accounts

1) Maximum maturity: Statutory: None.  
   Policy: Open ended.

2) Maximum par value, total portfolio: Statutory: None.  
   Policy: 5%.

3) Maximum par value per name: Statutory: Shall not exceed the net worth of the institution.  
   Policy: Same.

4) Maximum par value per maturity: Statutory: None.  
   Policy: None.

5) Credit: Institutions must be rated average or better by a nationally recognized statistical rating organization utilized by the State Treasurer’s Investment Division, and must pass a credit evaluation by the investment staff. All other conditions, regulations, or requirements associated with demand and time deposits will also apply.

6) Purpose: The NOW will act as an intra-day cushion to accommodate unexpected cash flow irregularities. In lieu of late sales to cover unexpected increases in disbursements, or in lieu of late investment limitations to cover unexpected increases in revenues, the NOW will provide pre-market and post-market liquidity and investment flexibility.
J. Foreign Government Bonds/Notes


2) Maximum par value, total portfolio: Statutory: 1% of the current portfolio. Policy: Same.

3) Maximum par value per name: Statutory: None. Policy: None.

4) Maximum par value per maturity: Statutory: None. Policy: None.

5) Credit: Must be direct obligations of the government of a foreign country that the International Monetary Fund lists as an advanced economy and for which the full faith and credit of that country has been pledged for the payment of principal and interest, if the securities are rated investment grade or its equivalent, or better, by a nationally recognized statistical rating organization.

K. Money Market Mutual Funds


2) Maximum par value, total portfolio: Statutory: 10% of the current portfolio. Policy: Same.

3) Maximum par value per name: Statutory: 10% of the mutual fund’s total assets. Policy: Same.

4) Maximum par value per maturity: Statutory: None. Policy: None.

5) Credit: Money market mutual funds eligible for investment under this subdivision must invest in securities and obligations described in Sections A, B, or H of this Policy. The financial institutions issuing the shares must have at least 5 years of investment experience in these funds and have at least $10 billion in assets under management. In addition, money market mutual funds must have attained the highest ranking or the highest letter and numerical rating provided by not less than two nationally recognized statistical rating organizations utilized by the State Treasurer’s Investment Division.
II. GUIDELINES FOR MAINTAINING LIQUIDITY

First priority will be the cash flow needs as reported on both the monthly and six-month cash forecasts. These forecasts will be updated daily using the current investment input, as well as adjustment information provided by the Centralized Treasury and Securities Management Division.

Sufficient Treasury securities will be maintained for unscheduled cash needs. It has been determined that Treasury Bills having maximum maturity of one year will be used for this purpose. Because of their federal government guarantee, as well as the short maturity, the exposure to market risk is minimal.

Due to the make-up of the portfolio participants, an average maturity of 120 days to eighteen months will be maintained.

III. GUIDELINES FOR MAINTAINING RATE OF RETURN

It is important to focus on providing a consistent rate of return, not only to the quarterly participants of the pool, but the longer-term depositors as well. It is often the case that investments made with long-term deposits create the base rate to the portfolio. Since sales gains/losses impact the portfolio on a quarterly basis, large gains/losses are to be avoided. Failure to offset gains or losses proportionately could result in an uneven or erratic earnings apportionment rate history. Extreme positions or styles of trading are prohibited.

Current investment strategies and economic releases are regularly discussed amongst the investment staff. Decisions of value and direction are made to accommodate the occurrence of all those events which might be considered reasonable and probable.

Although securities trading is allowed for purposes of enhancing portfolio return, specific limitations have been established to protect the portfolio rate of return:

1) Prior to taking a position, apparent value and size will be discussed between the Director of Investments, or his/her designee, and the trader involved.

2) During a “when issued” (W.I.) period, long positions shall never exceed the amount intended to be purchased.

3) Short positions will not be taken at any time.

4) Trading positions are to be reported daily to the Director of Investments.