

# **OPERATION OSWEGO COUNTY, INC.**

## **INVESTMENT POLICY GUIDELINES AND PROCEDURES**

Revised and adopted the 17<sup>th</sup> day of September, 2018

### **POLICY:**

Except as otherwise prohibited or regulated by federal or state law, or regulation, or by court order, the Executive Director or their designee, shall temporarily invest funds of Operation Oswego County, Inc., not required for immediate expenditure, in certain acceptable investment instruments as outlined in the guidelines and procedures as set forth below. In investing such funds, the Executive Director shall concurrently pursue the following objectives:

1. To provide a level of liquidity to insure the availability of funds for payment to meet obligations of the Operation Oswego County, Inc. or for disbursement otherwise required.
2. To minimize the amount of funds un-invested.
3. To minimize the risk of any potential loss or devaluation of funds invested.
4. To earn a maximum rate of return on funds invested, within the limitations as to types of investments permitted under these policies and the provisions of General Municipal Law.

### **GUIDELINES AND PROCEDURES:**

#### **1. Funds to Be Invested**

1) To the extent that Operation Oswego County, Inc. has funds beyond that which are necessary to meet current obligations or for disbursement otherwise required, such funds shall from time to time be invested by the Executive Director in acceptable investment instruments.

#### **2. Acceptable Investment Instruments**

1) Acceptable investment instruments for the investment of funds by the Executive Director are as follows:

a) Certificates of Deposit issued by a bank or trust company authorized to do business in New York State, provided however, that such Certificates of Deposit shall be payable within such time as the proceeds shall be needed to meet expenditures for which such

monies were obtained, and provided further that such certificates of deposit be secured in the same manner as provided for securing deposits of public funds by Subdivision 3 of Section 10 of the New York General Municipal Law.

b) Time Deposit Accounts in a bank or trust company authorized to do business in New York State, provided however, that such Time Deposit Accounts shall be payable within such time as the proceeds shall be needed to meet expenditures for which such monies were obtained and provided further that such time deposit accounts be secured in the same manner as is provided for securing deposits of public funds by Subdivision 3 of Section 10 of the New York General Municipal Law.

c) Obligations of agencies of the federal government if principal and interest is guaranteed by the United States.

d) Obligations of the State of New York, and its political subdivisions.

### **3. Timing of Investments**

1) The Executive Director shall maintain a portfolio of all investments. Investments made by the Executive Director shall generally mature or otherwise be available for sale or redemption without penalty at such times as funds invested are required for payment to meet obligations of Operation Oswego County, Inc., or are otherwise required for disbursement.

### **4. Collateral Requirements**

1) Certificate of Deposits and Time Deposit Accounts shall be fully secured to the maximum amount set by the Federal Deposit Insurance Corporation.

2) Certificate of Deposits and Time Deposit Accounts with principal value in excess of the amount insured by the Federal Deposit Insurance Corporation, shall be fully secured by eligible securities as that term is defined in Section 10 of the General Municipal Law having in the aggregate a market value at least equal to the aggregate amount of the deposits and Third Party Custodial Agreements shall be entered into with the deposit institution.

3) Collateral shall be delivered to and held by the Executive Director as part of the investment portfolio or be delivered to a custodial bank or trust company with which Operation Oswego County, Inc. has a Custodial Agreement. Said Custodial Institution shall provide written confirmation to the Executive Director of the obligations held in such institutions as collateral for investments of Operation Oswego County, Inc..

4) Collateral is required for Certificate of Deposits and Time Deposit Accounts at 105% of all deposits not covered by federal deposit insurance. Obligations that may be pledged as collateral are obligations of the United States and its agencies and obligations of the State of New York and its political subdivisions.

5) When, in the opinion of the Audit Committee, the funds held in Certificates of Deposits and time deposits exceed 105% of all deposits not covered by Federal Deposit Insurance, the Executive Director shall be authorized to pursue utilization of the Certificate of Deposit Account Registry Service (CDARS) and/or an Insured Cash Sweep (ICS) through participating financial institutions.

## **5. Custodial Institutions**

1) The Executive Director shall from time to time enter into contracts with banks or trust companies licensed to do business in New York State to act as custodian of funds owned by Operation Oswego County, Inc. or of funds pledged as collateral for certificates of deposit or time deposit accounts. Custodians must be member banks of the Federal Reserve Bank or maintain accounts with member banks. A custodial contract shall not be entered into for holding of an investment with the same party from which such investment instrument was acquired, without approval of the Board of Directors of the Operation Oswego County, Inc. A custodial contract may be entered into with the Trust Department of the seller of the investment instrument provided that the Trust Department is a separate corporate entity. At the request of the Executive Director, custodial institutions shall verify collateral held on behalf of Operation Oswego County, Inc. as property or as collateral for an investment instrument.

## **6. Financial Strength of Institutions**

1) The financial statements of banks and trust companies with which Operation Oswego County, Inc. transacts investment business shall be reviewed from time to time or at least by the Executive Director to determine the financial strength and or credit worthiness of the institution.

## **7. Competition for Acquisition and Sale of Investment Instruments**

1) The Executive Director shall endeavor to insure competition amongst interested and eligible institutions for the acquisition or sale of investment instruments and shall make every reasonable effort to solicit by telephone or other electronic device at least three quotations for every investment transaction except for interim investment instruments which may from time to time be necessary to conduct normal day to day business operations of Operation Oswego County, Inc.

2) The Executive Director shall maintain a file of any confirmations, correspondence, or statement which support investment activity.

## **8. Report to be Provided**

1) The Executive Director shall prepare quarterly and annual reports to the Board of Directors of Operation Oswego County, Inc. reflecting, as of the last day of such quarter, an inventory of investment instruments, a listing of investment instruments acquired or

redeemed during the quarter, and a statement of investment income earned for the quarter and cumulative total interest earned since the beginning of the current fiscal year.

**9. Internal Controls to be Maintained**

1) The Executive Director shall establish, document and maintain a system of internal controls which provides for segregation of duties with respect to investment activities, cash receipts, and accounting.

**10. Miscellaneous Provisions**

1) The Executive Director from time to time shall designate qualified staff personnel to assist in carrying out the provisions of the Policies Guidelines and Procedures as outlined above.

**11. Intent**

It is the intent that this Investment Policy Guidelines and Procedures conform to the requirements of the provisions of Sections 10 and 11 of the New York General Municipal Law, as the same may be amended from time to time, and in the event of any inconsistency between these policies and the provisions of those statutes, the statutory provision shall control and be followed to their fullest extent by the Agency and its officers and directors.

**APPROVAL:**

This policy was ratified by the Board of Directors at its meeting held on March 21, 2022.

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Peter Cullinan  
Secretary

**[END OF POLICY]**