



**YOUNGSTOWN
STATE
UNIVERSITY**

**BOARD OF TRUSTEES
INVESTMENT SUBCOMMITTEE**

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**BACKGROUND MATERIALS
Wednesday, March 6, 2019**

- 1. Policy 3356-3-10, Investment of the University's Non-Endowment and Asset Allocation and Other Investment Guidelines.**

Tab 1

3356-3-10 Investment of the university's non-endowment and endowment funds.

Previous Policy Number: 3007.01
Responsible Division/Office: Finance and Administration
Responsible Officer: President
Revision History: September 1998; December 2004; June 2006;
December 2008; June 2010; June 2012;
December 2014
Board Committee: Finance and Facilities
Effective Date: December 16, 2014
Next Review: 2017

- (A) Policy statement. The president and the vice president for finance and administration, or designee, is authorized to invest university funds in compliance with this policy, provisions of the Revised Code and all other applicable laws and regulations, including Amended Substitute House Bill 524, 124th General Assembly amending section 3345.05 of the Revised Code.
- (1) For the purpose of this policy on the investment of the university's non-endowment and endowment funds (the "policy"), the non-endowment and endowment portfolios shall include:
- (a) All tuition and mandatory fees, registration, non-resident tuition fees, academic fees for the support of on- and off-campus instruction, laboratory and course fees when so assessed and collected, all other fees, deposits, charges, receipts, and income from all or part of the students, all subsidy or other payments from state appropriations, and all other fees, deposits, charges, receipts, and income received. These funds shall be held and administered by the board of trustees.
 - (b) Notwithstanding any provision of the revised code to the contrary, the title to investments made by the board of trustees with funds derived from revenues described above shall not be vested in the state but shall be held in trust by the board. Such investments shall be made pursuant to this

investment policy adopted by the board in public session. Such investments shall be made with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims.

- (c) It is the intention of the board of trustees that actions taken pursuant to this policy shall be in compliance with all applicable laws as they may be amended from time to time. No university representative, employee, or agent shall take any action prohibited by or fail to take any action required by all applicable laws in carrying out this policy.
- (d) Members of the board of trustees will annually provide to the chair of the board of trustees a statement disclosing the nature, if at all, of any relationship with the financial institutions involved with the university's non-endowment and endowment funds. Any member having a relationship that creates a conflict prohibited by the ethics laws with any investment entity will withdraw from participating in the selection of, or authorizing the contracts of, those investment managers and/or consultants.
- (e) External investment managers, consultants and advisors retained by the university shall immediately notify the chair of the investment subcommittee and the vice president for finance and administration, or designee, of any potential conflicts of interest which may develop from time to time. In any such situation, the external investment manager, consultant and/or advisor shall identify the nature of the conflict of interest and its potential impact, if any, on the university.
- (f) The university's non-endowment portfolio will remain sufficiently liquid to enable the university to meet all operating requirements. Portfolio liquidity is defined as the maturity or ability to sell a security on short notice near the purchase price of the security. To help retain the desired liquidity, no security shall be purchased that is likely to have few market makers or poor market bids. Additionally,

liquidity shall be assured by keeping an adequate amount of short-term investments to accommodate the cash needs of the university.

- (g) The university's non-endowment and endowment portfolios shall be structured with the objective of attaining the highest possible total return for the investment portfolio while adhering to a prudent level of risk.
- (2) Specific responsibilities of the investment subcommittee of the finance and facilities committee of the board of trustees (hereafter referred to as the "subcommittee") in the investment process include:
- (a) The application of a total return philosophy of asset management;
 - (b) Developing sound and consistent investment policy guidelines;
 - (c) Setting forth an investment structure for managing the university's assets. This structure includes identification of asset classes, strategic asset allocation, and acceptable asset ranges above and below the strategic asset allocation;
 - (d) Providing guidelines that control the level of overall risk and liquidity assumed for the investment portfolio so that all assets are managed in accordance with stated objectives;
 - (e) Complying with all applicable fiduciary, prudence, due diligence requirements, and with all applicable laws, rules and regulations from various local, state, federal, and international political entities that may impact fund assets;
 - (f) Selecting and monitoring investment managers;
 - (g) Selecting an investment consulting organization;
 - (h) Communicating clearly the major duties and responsibilities of those accountable for achieving investment results;

- (i) Monitoring and evaluating results to assure that the guidelines are being adhered to and the objectives are being met;
 - (j) To control costs of administering and managing the funds;
 - (k) Taking appropriate action to discharge an investment manager for failure to perform as mutually expected at the time of selecting; and
 - (l) Undertaking such work and studies as may be necessary to keep the board of trustees of the university adequately informed as to the status of the investment of the balance sheet assets (the "assets").
- (3) This policy shall be reviewed every five years by the subcommittee or upon the advisement of investment advisors or management. All material changes to the policy will be approved by the subcommittee and submitted to the university's board of trustees for final approval.
- (B) UPMIFA considerations. In accordance with the state of Ohio's adoption of the Uniform Prudent Management of Institutional Funds Act ("UPMIFA"), effective June 1, 2009, the subcommittee will take the following into consideration when making investment decisions:
- (1) General economic conditions.
 - (2) The possible effect of inflation or deflation.
 - (3) Expected tax consequences.
 - (4) The role that each investment plays within the overall portfolio.
 - (5) Expected total return from income and appreciation.
 - (6) Other resources of the institution.
 - (7) Need of the institution to make distributions and preserve capital.

- (8) Assets special relationship or special value to the charitable purpose.
- (C) Purpose. Investments shall be managed for the use and benefit of the university in a diversified portfolio that focuses, over time, on the preservation of capital, minimization of cost and risk, maintenance of required levels of liquidity in the overall portfolio to meet cash flow requirements, and compliance with state statute. The non-endowment and endowment portfolios are intended to achieve a reasonable yield balanced with a component invested for longer-term appreciation.
- (1) The purpose of this policy is to assist the university in more effectively supervising and monitoring the investment activities of its assets. This policy is designed to assist university staff and the investment subcommittee with regard to its fiduciary responsibility by:
 - (a) Defining the responsibilities of university staff, its investment managers, and its investment consultant;
 - (b) Stating in writing the university's attitudes, expectations, and goals for the investment of the assets;
 - (c) Providing a basis for reviewing investment management organizations in the selection process;
 - (d) Encouraging effective communication between the investment managers, investment consultant, the subcommittee, and Youngstown state university; and
 - (e) Setting objectives against which the performance results of the investment managers, operating within the constraints imposed by the university's policy guidelines, can be measured.
 - (2) A primary expectation for university assets is to support the university by providing current income to the university from both non-endowed and endowed funds, managed on behalf of the university by outside investment professionals, while concurrently growing principal. The asset base is dedicated to providing a

reliable source of funds for current and future enhancements at the university.

(D) Parameters.

- (1) Investment assets are to be held by a reputable custodian/trust company. Investment assets are to be held in safe-keeping in the name of the university. Evaluation, selection, and monitoring of the university's custodian will include, but not be limited to, the following factors:
 - (a) Size and scalability of the underlying financial institution;
 - (b) Delivery of competitive safe-keeping and trust services as measured by attributes such as systems functionality, statement delivery, client service, audit controls and reporting capabilities; and
 - (c) Safe-keeping and trust service pricing and fees.
- (2) The management of the non-endowment and endowment funds involves a tradeoff between two competing goals. On the one hand, the funds must preserve capital and maintain liquidity sufficient to distribute cash to fund immediate operating needs and prior spending commitments. To accommodate these objectives, the university will establish the operating and short-term pool. On the other hand, the funds must accumulate capital sufficient to support nominal growth in expenses for existing programs and to establish new quasi-endowment funds. To accommodate these objectives, the university will establish the long-term/reserve pool. The goal of the funds is to accommodate these competing needs by providing adequate short-term liquidity along with long-term capital appreciation.
- (3) The subcommittee recognizes that risk and volatility are present to some degree with all types of investments. However, high levels of risk are to be avoided at the total asset level. This is to be accomplished through diversification by asset class, style of investment manager, and sector and industry limits.

- (4) The following statements and guidelines are set forth in an effort to provide direction to each of the investment managers that manage separate accounts for the university. Managers are retained to manage separate pools of assets, and funds are allocated to such managers in order to achieve an appropriate, diversified, and balanced asset mix. The subcommittee, from time to time, may shift assets from one manager to another to maintain the appropriate mix. Additionally, the subcommittee recognizes that mutual or commingled funds used by the university may not adhere to these guidelines. However, when selecting mutual or commingled fund products, the subcommittee will refer to these guidelines as a basis to select new funds.
- (5) Evaluation, selection, and monitoring of the university's individual investment managers will include, but not be limited to, the following factors:
 - (a) Each investment manager should have clearly stated investment objectives.
 - (b) The performance (return) and volatility (risk) of each investment manager should be evaluated over time, evaluating performance in light of how closely the investment manager has adhered to its stated investment objectives.
 - (c) The depth and experience of the portfolio manager(s) should be evaluated (both with respect to the current investment portfolio he or she manages and any funds previously managed).
 - (d) The depth and financial stability of the relevant investment fund company should be considered.
 - (e) The fees and expenses charged with respect to such investment management services should be considered.
- (6) A written "Investment Guideline Statement" or prospectus clearly outlining objectives and responsibilities will be in place with each investment manager. For the non-endowment funds, the managers shall have discretion to invest assets in cash reserves as they deem

appropriate but will be expected under normal circumstances to be fully invested in their assigned asset class. A manager's performance will be evaluated against their fully invested passive benchmark and against similar portfolio results. Passive benchmarks will be used for comparative purposes which most closely approximate the investment mandate's duration, credit quality, security composition, capitalization, style, asset class, etc.

- (7) To the extent bequests are made to the university via shares of marketable equity securities, the following provisions apply:
- (a) The policy on bequests as defined by rule 3356-5-07 of the Administrative Code will supersede all provisions within this policy.
 - (b) If the bequest is a non-endowed gift, the securities will be sold as soon as prudently possible.
 - (c) If the bequest is an endowed gift, the securities will be invested as specified by the donor and agreed to by the board of trustees.

(E) Procedures.

- (1) The vice president for finance and administration, or designee, shall be accountable to the board of trustees for implementing this policy.
- (2) The vice president for finance and administration, or designee, will report to the investment subcommittee at least quarterly on the status of the non-endowment and endowment portfolios.
- (3) It shall be permissible for the vice president for finance and administration, or designee, to realize gains and losses if such an action would be consistent with the university's investment goals. Losses and gains realized on the non-endowment portfolio shall be charged against current income unless otherwise approved by the investment subcommittee.
- (4) Between meetings of the board of trustees, if deemed advisable, other investments not specifically authorized by this policy may be

made if approved by the investment subcommittee. Any such actions shall be taken to the board of trustees for review at its next meeting.

- (F) Spending policy. The board has established a spending policy for certain funds. This policy reflects the tradeoffs between short-term liquidity and long-term capital appreciation needs, as described in paragraphs C and D of this rule.
- (1) Non-endowment assets. Non-endowment assets are comprised of operating and non-operating funds and include cash, cash equivalents, and investment assets.
 - (2) Operating funds comprised of cash, cash equivalents, and certain investment assets make up the university's general funds. The use of cash, cash equivalents, and investment assets in these general funds is not subject to any board-approved spending policy as the university's annual operating budget establishes parameters for the use of these funds.
 - (3) The university's remaining non-endowed investment assets are primarily in reserve for project-related funds. Spending within these funds is subject to rule 3356-3-11.1 of the Administrative Code, project-specific spending plans, and various other university operating and financial policies and procedures. If deemed necessary for university operations, university management, working with the investment consultant, has authority to raise an appropriate level of cash from non-operating investments.
 - (4) Income earned on non-endowed investment assets is primarily used to support university operations; thus, it is the policy of the board not to limit annual distributions of realized investment income. The annual operating budget establishes parameters for the use of this income, and the disposition of total annual net operating inflows over outflows requires board approval. Unrealized investment income from non-endowment assets shall always be non-spendable.
 - (5) Endowment assets. It is the policy of the board to set annual distributions each fiscal year to five per cent of the twelve-quarter average of the market value for the preceding twelve calendar

quarters. In calculating the twelve-quarter average, census dates of March thirty-first, June thirtieth, September thirtieth, and December thirty-first for the previous three years shall be used. Any distribution greater than this would require written justification and approval by the board of trustees. For all other managed funds, distributions are project-specific and, thus, are limited only to the extent needed to sustain appropriate cash flow for the expenditure cycle of the corresponding project.

YOUNGSTOWN STATE UNIVERSITY
Asset Allocation and Other Investment Guidelines
Investment of Non-Endowment University Funds
(Last revised: November 30, 2016)

ASSET ALLOCATION GUIDELINES

The Assets of the University are to be allocated between short-term assets and long-term assets. The Asset Allocation section of the Policy is specifically intended to address short-term assets and long-term assets as two distinct asset pools of the University's balance sheet assets.

The objectives that the University has established in conjunction with a comprehensive review of the current and projected financial requirements are as follows:

1. The strict adherence to the Ohio Revised Code and the authority granted under Ohio Revised Code §3345.05. Specifically:
 - a. ORC 3345.05 (C)(1): A minimum of 25% of the average amount of the University's investment portfolio over the course of the previous fiscal year must be invested in securities of the United States government or of its agencies or instrumentalities, the treasurer of state's pooled investment program, obligations of this state or any political subdivision of this state, certificates of deposit of any national bank located in this state, written repurchase agreements with any eligible Ohio financial institution that is a member of the federal reserve system or federal home loan bank, money market funds, or bankers acceptances maturing in two hundred seventy days or less which are eligible for purchase by the federal reserve system, as a reserve.
 - b. ORC 3345.05 (C)(2): Eligible funds above those that meet the conditions described in ORC 3345.05 (C)(1) may be pooled with other institutional funds and invested in accordance with section 1715.52 of the Revised Code.

The Operating and Short-Term Pool will be comprised of cash and short-term assets required for working capital, liquidity purposes, and other short-term needs. It is understood that assets classified as short-term are to be maintained primarily in cash and cash equivalents, and may also invest partially in short term fixed income (guidelines defined within), in order to meet the daily liquidity needs of the University. The asset allocation guidelines of the Operating and Short-Term Pool are outlined in the table below.

The Long-Term / Reserves Pool are investments with a time horizon in excess of one year. It is assumed that financial needs of the University ranging from one to five years will be maintained in fixed income investments. It is further assumed that any equity or alternative investments will have a time horizon greater than five years. As shown in the

table below, short-term and intermediate-term fixed income, alternative investments, and equity are classified as long-term assets.

Based on the investment objectives and risk tolerances stated in these guidelines, the following asset allocation strategy is considered appropriate for the University's investment Assets:

Operating & Short Term Pool		Allocation	
Asset Class/Investment Strategy	Pool Target	Pool Range	Total Range
Total Cash/Operating Assets	n/a	60-100%	
Total Short-Term Fixed Income	n.a	0-40%	
			25-50%
Long Term/Reserves Pool			
Total Domestic Equity	27%	20-35%	
Total International Equity	8%	0-15%	
Total Equity	35%	25-45%	
Total Alternatives	10%	0-20%	
Total Short-Term Fixed Income	35%	25-45%	
Total Intermediate-Term Fixed Income	20%	10-30%	
Cash	0%	0-5%	
	100%		50-75%

According to the University's Policy, the operating and short term funds of the non-endowment funds are allocated to the Operating and Short-Term Pool of the asset allocation guidelines. Adequate balance of 60 to 100% of the pool will be invested in cash and cash equivalents in order to provide the University with liquidity to meet its operational needs. The Pool may also invest 0-40% in 1-3 year average maturity U.S. Government fixed income investments. The Operating and Short Term Pool should represent no less than 25% of the total market value of the Investments. Although the actual percentage will fluctuate with market conditions, levels in excess of 50% or below 25% will result in rebalancing the Investments to target levels. The Subcommittee will review the pool level allocations on a quarterly basis.

According to the University's Policy, funds with a longer time horizon are allocated to the Long-Term / Reserves Pool. This Pool will be comprised of short-term fixed income, intermediate-term fixed income, alternative investments, and equity.

Short-term fixed income should normally represent 35% of the total market value of the Pool. Although the actual percentage will fluctuate with market conditions, short-term fixed income levels in excess of 45% or below 25% will result in rebalancing the short-term fixed income component of the pool to its target level. The Subcommittee will review the short-term fixed income allocation on a quarterly basis.

Intermediate-term fixed income should normally represent 20% of the total market value of the pool. Although the actual percentage will fluctuate with market conditions, short-term fixed income levels in excess of 30% or below 10% will result in rebalancing the intermediate-term fixed income component of the pool to its fixed income target level. The Subcommittee will review the intermediate-term fixed income allocation on a

quarterly basis. Up to 10% of the fixed income investments in the Long Term Pool may be made in below investment grade debt (high yield).

The equity component should normally represent 35% of the total market value of the long-term pool. Although the actual percentage of equities will vary with market conditions, equity levels in excess of 45% or below 25% will result in rebalancing the equity component of the fund to its equity target level. The Subcommittee will review the equity allocation on a quarterly basis.

The alternative investments component should normally represent 10% of the total market value of the long-term pool. Although the actual percentage will vary with market conditions, levels in excess of 20% will result in rebalancing the alternatives component of the fund to its target level. The Subcommittee will review the alternative allocation on a quarterly basis.

Depending upon market conditions, the percentage allocation to each asset class may fluctuate within the above policy ranges. Such strategic allocations should be reviewed and approved by the Investment Subcommittee on an ongoing basis. In the event that the allocation to a certain investment Pool and asset class falls above or below the above established ranges, the Consultant should make a recommendation to the Investment Subcommittee to rebalance the portfolio.

Investment objectives and guidelines will be established for each separate account investment manager. Mutual funds are not subject to the Guidelines set forth below. As it relates to the selection and retention decisions regarding mutual funds, the stated Guidelines should be used as references.

CASH AND CASH EQUIVALENTS GUIDELINES

Such investments should be prudently diversified and would include:

- any instrument issued by, guaranteed by, or insured by the U.S. Government, agencies, or other full faith instruments;
- commercial paper issued by domestic corporations which is rated both "P-1" and "A-1" by Moody's and Standard & Poor's, respectively;
- certificates of deposit, bankers acceptances, or other such irrevocable primary obligations from a list of approved banks provided by the managers; and
- commingled, short-term cash reserve funds managed generally in accordance with the principles set forth above.

FIXED INCOME GUIDELINES

The objective of the fixed-income portion of the Assets shall be both to provide a secure, above-average stream of income (i.e., income in excess of U.S. Treasury Bill rates) and

to provide a relatively stable market value base. The following directions are intended to apply to all fixed-income investment managers:

- Within the Operating and Short Term Pool, non-cash investments are limited to U.S. government only fixed income securities with a 1 to 3 year average maturity and duration +/- 20% of the stated benchmark.
- Fixed-income investments may include U.S. and Non-U.S. issues of Government and Agency obligations, marketable corporate bonds, mortgage or asset-backed bonds, and preferred stocks with sinking funds as deemed prudent by the investment managers.
- Fixed income investments are to be prudently diversified by security type, with an emphasis toward avoiding concentrated positions in any one fixed income sector or security type.
- Fixed-income portfolio maturity, as measured by portfolio duration, should be in the range of 80% to 120% of the applicable benchmark.
- Below investment grade fixed income investments are permissible up to 10% of the total fixed income allocation; however, the total portfolio will seek an average weighted credit quality of "AA" or better by Standard & Poor's.
- No more than 5% of the fixed income investments, at market, shall be invested in securities of any one issuer, except Government and Agency obligations, without the Subcommittee's prior approval.
- Cash equivalent investments (maturities less than one year) are permitted, up to 10% of the total market value of the account, when the managers' investment policies discourage longer-term commitments. However, the Subcommittee must be consulted in the event that the manager chooses to increase its cash equivalent position beyond 10% of the assets under its supervision.
- Investment assets allocated to fixed income investment management firms and institutions shall be properly diversified so as to avoid over concentration with any one investment manager or institution.

EQUITY GUIDELINES

The objective of the equity portion of the Assets shall be to provide for potential growth of principal with a long term time horizon. The use of both passively managed equity index strategies and actively managed separate accounts and comingle funds is permitted. The following acceptable sub asset classes will serve as a guideline for equity investments:

- A. Large Cap Domestic - common stocks or equivalents listed on an established stock market (e.g., NYSE, AMEX, NASDAQ) and readily marketable with market capitalization generally exceeding \$5 billion. Non-marketable securities may not be purchased or held without prior approval from the Subcommittee. As used herein, “generally exceeding \$5 billion” means that greater than 67% of the value of the portfolio is invested in securities when the market capitalization of which exceeds \$5 billion.
- B. Small/Mid Cap Domestic - common stocks or equivalents listed on an established stock market (e.g., NYSE, AMEX, NASDAQ) and readily marketable with market capitalization generally exceeding \$500 million. Non-marketable securities may not be purchased or held without prior approval from the Subcommittee. As used herein, “generally exceeding \$500 million” means that greater than 67% of the value of the portfolio is invested in securities when the market capitalization of which exceeds \$500 million.
- C. International - common stocks or equivalents listed on an established stock market (e.g., NYSE, AMEX, NASDAQ, FTSE, NIKKEI, DAX) and readily marketable with market capitalization generally exceeding \$1 billion. Non-marketable securities may not be purchased or held without prior approval from the Subcommittee. As used herein, “generally exceeding \$1 billion” means that greater than 50% of the value of the portfolio is invested in securities when the market capitalization of which exceeds \$1 billion.

Equity Diversification

Each investment manager should diversify the portfolio in an attempt to minimize the impact of substantial losses in any specific industry or issue. Therefore, each equity account:

- May not invest more than approximately 5% of the account valued at cost in a given issuer
- May not invest more than approximately 10% of the account valued at market in a given issuer
- Large Cap, Mid Cap and Small Cap Domestic - Shall be broadly diversified by industry or sector groups and not represent over concentration relative to the mandate’s relevant benchmark. Additionally, domestic equity managers shall limit international-domiciled securities to 10% of their portfolio value, absent Subcommittee approval.
- International – Shall be broadly diversified by county, industry or sector groups and not represent over concentration relative to the mandate’s

relevant benchmark; and limit emerging market exposure to 25% of total international exposure.

ALTERNATIVE INVESTMENT GUIDELINES

Alternative investments are investments that are not included in the traditional assets of cash, equities, and fixed income. Alternative investments include categories such as hedge funds, private equity, real estate, commodities, tactical asset allocation strategies, etc.

The objective of the alternative investments shall be to promote diversification and provide risk-limiting characteristics with the goal of long-term return potential and lower overall portfolio volatility.

With the assistance of its investment consultant, it is the responsibility of the Subcommittee to conduct acceptable levels of due diligence on any investment categorized as an alternative investment. The due diligence process will include obtaining proper education on the risks and rewards of the alternative asset class, as well as the underlying risks and characteristics of the alternative investment vehicle. This due diligence process must be properly documented and retained.

Investments in real estate, real assets, commodities, tactical asset allocation, equity long/shorts, and absolute return strategies are permissible to the extent that they are established within the asset allocation guidelines and are investments as part of the underlying investment strategy of a well-diversified, highly liquid mutual fund, whose shares are publicly traded on major U.S. exchanges.

Other alternative investment asset classes including but not limited to hedge funds and private strategies, such as private equity, venture capital and levered buyouts, are not permitted at this time.

PROHIBITED INVESTMENTS

The following categories of securities and strategies are not considered appropriate at the present time:

- Private Placements
- Unregistered or Restricted Stock
- Margin Trading/Short Sales
- Commodities, Commodity Contracts, Precious Metals, or Gems (excluding liquid mutual funds)
- Real Estate Property (excluding REITs)
- Guaranteed Insurance Contracts
- Securities Lending; pledging or hypothecating securities

VOTING OF PROXIES AND TRADE EXECUTION

The investment manager shall vote proxies for separately managed accounts on behalf of the University. The Investment Subcommittee will vote all mutual fund proxies.

The Subcommittee expects the purchase and sale of its securities to be made in a manner designed to receive the combination of best price and execution.

RESPONSIBILITIES OF THE INVESTMENT MANAGERS FOR SEPARATELY MANAGED ACCOUNTS

The guidelines below are applicable to all investment managers that manage money for the University on a separate account basis. However, any mutual or commingled fund retained by the University will not be expected to adhere to these responsibilities.

Adherence to Policy Guidelines

The Assets are to be managed in accordance with the Policy guidelines herein or expressed by separate written instructions when deviation is deemed prudent and desirable. Written instructions amending this Policy document must be authorized by the Subcommittee and will be communicated through the University's Vice President for Finance and Administration or the investment consultant.

Discretionary Authority

The investment managers are expected to exercise complete investment discretion within the boundaries of the restrictions outlined in these guidelines. Such discretion includes decisions to buy, hold, or sell equity or fixed-income securities (including cash equivalents) in amounts and proportions reflective of each manager's current investment strategy.

Communication

The Subcommittee encourages, and the investment managers are responsible for, frequent and open communication with the Subcommittee and the investment consultant on all significant matters pertaining to the investment of the Assets. These communications would generally be addressed to the University's Vice President for Finance and Administration or investment consultant. In this manner, the Subcommittee expects to be advised of any major changes in investment outlook, investment strategy, asset allocation, portfolio structure, market value of the Assets, and other substantive matters affecting the Assets. The Subcommittee also expects to be informed of any significant changes in ownership, organizational structure, financial condition, and/or senior personnel staffing of the investment management organizations.

All investment managers will be required to meet with the University's Investment Subcommittee at the discretion of the Subcommittee.

The Subcommittee recognizes that the Policy requires periodic re-examination and, perhaps, revision if it is to continue to serve as a working document to encourage effective investment management. Whenever an investment manager believes that the Policy should be altered, it is the responsibility of the manager to initiate written communication with the Subcommittee.

Reporting

The Subcommittee expects each investment manager to forward, on a timely basis, quarterly reports containing portfolio activity, valuations at market, and quarterly strategy updates.

Compliance with Prudence and Diversification Measures

As fiduciaries, the investment managers are expected to diversify the portfolio to minimize the risk of large losses. The managers are expected to invest the Assets with care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with such aims. Furthermore, the investment managers are expected to acknowledge in writing their intentions to comply with the Policy as it currently exists or as modified by the Subcommittee from time to time.

RESPONSIBILITIES OF THE INVESTMENT CONSULTANT

The investment consultant is responsible for providing information and analysis to assist the University with the following:

- reviewing asset allocation and investment strategy on an annual basis to determine if the current strategy meets the cash flow needs of the University and is maximizing the long-term total return of the Assets;
- reviewing all separately managed accounts to ensure that each investment manager is adhering to the issued Policy guidelines;
- communicating with all investment management organizations on a quarterly basis to determine portfolio composition and to ascertain information concerning organizational change. (Each portfolio is to be reviewed for style drift through portfolio holdings and returns-based style analysis. Additionally, each portfolio is to be reviewed for prohibited investments on an ongoing basis);
- providing a quarterly performance evaluation report and assessment of the University's Assets;
- monitoring the equity holdings of the total portfolio to determine if any one holding represents a percentage weighting that exceeds 10% of the total portfolio and alerting the Subcommittee when the portfolio violates this Policy;
- reviewing asset allocation on a quarterly basis to determine if the current levels are consistent with the asset allocation guidelines stated in this document;
- monitoring the performance of each investment manager retained by the University to determine if the investment product is out-performing the appropriate benchmark over rolling 3 and 5-year time periods; and

monitoring the performance of the total portfolio to determine if the collective investment strategy is outperforming the appropriate benchmarks over rolling 3 and 5-year time periods.

EVALUATION AND REVIEW

The objective of the evaluation and review process is to monitor the progress of the Assets in achieving the overall investment objectives. Performance will be measured and reviewed periodically by the Subcommittee and their consultants. Particular attention will be directed toward:

- determining whether the total funds are achieving their stated objectives;
- determining whether the investment managers are performing satisfactorily in relation to both the objectives set forth in this Policy, as a primary consideration, and to other investment organizations managing similar pools of capital and the recognized market indices;
- determining whether the investment managers are adhering to the guidelines set forth herein;
- the relative total portfolio return and volatility versus established benchmarks and peers;
- any issue involving the management of the investment assets;
- asset allocation structure in light of evolving markets, strategies, and fund requirements;
- reviewing benchmarks at least annually to determine appropriateness;
- determining whether the investment managers are adhering to their stated philosophy and style; and
- determining whether the overall policies and objectives continue to be appropriate, reasonable, and achievable.

REVIEW OF INVESTMENT RESULTS

On a regular basis, but not less than once annually, the Subcommittee will review actual progress of the funds versus the investment environment. The regular review will include:

- absolute market and total portfolio returns;
- relative total portfolio return and volatility versus established benchmarks and peers;
- asset allocation structure in light of evolving markets, strategies, and fund requirements;

- adherence to guidelines;
- individual manager performance versus established benchmarks and peers;
- the continuing appropriateness of this Policy; and
- any issue involving the management of the funds' assets.

The performance of each individual investment manager will be reviewed on a quarterly basis with appropriate benchmarks as agreed upon from time to time by the Investment Subcommittee.

Total Fund, Pool level, and asset class returns will be measured as follows:

Total Fund: Weighted average benchmark based on the asset allocation targets identified with these guidelines using the below referenced market indices.

Pool level: Weighted average benchmark based on the asset allocation targets identified with these guidelines using the below referenced market indices.

<u>Asset Class</u>	<u>Benchmark</u>
Operating / Short Term Pool	
Cash	91 Day T-Bill
Short Term Fixed Income	Barclay's Capital 1-3 Year Government Index
Long Term / Reserves Pool	
Domestic Equity	Russell 3000 Index
International Equity	MSCI EAFE Index
Intermediate Fixed Income	Barclay's Capital Intermediate Govt. / Credit Index
Short Term Fixed Income	Barclay's Capital 1-5 Year Govt. / Credit Index and Merrill Lynch 1-3 Year Govt./ Credit Index
Alternative Investments	CPI + 3% HFRI Fund-of-Funds Index HFRI Equity Hedge Index FTSE NAREIT Developed Index