

MUSKOGEE COUNTY FY27 INVESTMENT POLICY

In compliance with the provisions of Oklahoma Statutes Title 19 O. S. § 623, and 62 § 348.1 and 348.3, effective November 1, 2025, modified to 62 O. S. § 348A and 62 O. S. § 348B, the Muskogee County Board of County Commissioners, do hereby authorize and adopt the following Written Investment Policy:

I. **Governing Authority**

Legality

The investment program shall be operated in conformance with federal, state and other legal requirements, including Oklahoma State Statutes.

II. **Scope**

This policy applies to the investment of all operating and trust funds of Muskogee County. Longer-term funds, including investments of employees' retirement funds and proceeds from certain bond issues, are covered by a separate policy.

1. Pooling of Funds

Except for cash in certain restricted and special funds, the County can consolidate cash balances from all funds to maximize investment earnings. Investment income will be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting principles. Operational Funds shall be pooled managed for liquidity. The County will determine liquidity needs for operational funds.

2. External Management of Funds

Investment through external programs, facilities and professionals operating in a manner consistent with this policy will constitute compliance.

III. **General Objectives**

The Primary objectives, in priority order, of investment activities shall be safety, liquidity and yield:

1. Safety

Safety of principle is the foremost objective of the investment program. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The objective will be to

identify and mitigate credit risk and interest rate risk through diversification.

a. Credit Risk

The County will minimize credit risk, the risk of loss due to the failure of the security issuer or backer.

b. Interest Rate Risk

The County will minimize the risk that the market value of securities in the portfolio will fall due to changes in general interest rates.

2. Liquidity

The investment portfolio shall remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated. This is accomplished by structuring the portfolio so that securities mature concurrent with cash needs to meet anticipated demands (static liquidity). Furthermore, since all possible cash demands cannot be anticipated, the portfolio should consist largely of securities with active secondary or resale markets (dynamic liquidity). A portion of the portfolio also may be placed in bank deposits or repurchase agreements that offer same-day liquidity for short-term funds.

3. Yield

The investment portfolio shall be designed with the objective of attaining a market rate of return throughout budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs. Return on investment is of secondary importance compared to the safety and liquidity objectives described above. The core of investments are limited to relatively low risk securities in anticipation of earning a fair return relative to the risk being assumed. Securities shall not be sold prior to maturity with the following exceptions:

- A security with declining credit may be sold early to minimize loss of principle.
- A security swap would improve the quality, yield or target duration in the portfolio.
- Liquidity needs of the portfolio require that the security be sold.

IV. Standards of Care

1. Prudence

The standard of care 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 liability for an individual’s security credit risk or market price changes, provided deviations from expectations are reported in a timely fashion to the governing body, and the liquidity and the sale of securities are carried out in accordance with the terms of this policy

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 the probable income to be derived.

The investment officer and staff, acting in accordance with the written procedures and exercising due diligence, shall not be held personally responsible for a specific security’s credit risk or market price changes.

For bond issue to which the federal yield arbitrage regulations apply, the primary objections shall be to obtain satisfactory market yields to minimize the costs associated with negative arbitrage.

2. Ethics and Conflicts of Interest

Officers and employees involved in the investment process shall refrain from personal business 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. 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 which business is conducted on behalf of the County.

3. Delegation of Authority

Authority to manage the investment program is granted to Treasurer and derived from the following **62 O.S § 348A and § 348B**.

Responsibility for the operation of the investment program is hereby delegated to the investment officer, who shall act in accordance with the established written procedures and internal controls for the operation of the investment program consistent with this investment policy.

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 County Treasurer shall be responsible for all transactions undertaken and shall establish a system of controls to regulate the activities of subordinate officials.

V. Investment Transactions

1. Authorized Financial Dealers and Institutions

A list will be maintained of financial institutions authorized to provide investment transactions. In addition, a list also will be maintained of approved security broker/dealers selected by an interview process as determined by the County Treasurer and approved by the governing body. These may include “primary” dealers or regional dealers that qualify under Securities and Exchange Commission (SEC) Rule 15C3-1 (uniform net capital rule).

An annual review of the financial condition and registration of qualified financial institutions and broker/dealers will be conducted by the investment officer.

2. Internal Controls

The investment officer is responsible for establishing and maintaining an internal control structure. The internal control structure shall be designed to ensure that the assets of the County are protected from loss, theft or misuse and to provide reasonable assurance that these objectives are met. The concept of reasonable assurance recognizes that (1) the cost of control should not exceed the benefits likely to be derived and (2) the valuation of costs and benefits require estimates and judgments by management.

The internal controls shall include the following points:

- Control of collusion
- Separation of transaction authority from accounting and record keeping.
- Custodial safe-keeping.

- Clear delegation of authority to subordinate staff members.
- Written confirmation of transactions for investments and wire transfers
- Accounting method. The County shall comply with the Government Accounting Standard Board (GASB) requirements in reporting assets.

VI. Suitable and Authorized Investments

1. Investment Types

In accordance with and subject to restrictions imposed by current statutes, the following list represents the entire range of investments that the County will consider, and which shall be authorized for the investments of funds by the County.

- a. United States Treasury Securities. The County may invest in obligations of the United States government for which the full faith and credit of the United States are pledged for the payment of principal and interest
- b. United States Agency Securities & Instrumentalities. The County may invest in obligations issued or guaranteed by any agency of the United States Government as described in V. (2)
- c. Repurchase Agreements. The County may invest in contractual agreements between the County and commercial banks or primary government securities dealers. The purchaser in a repurchase agreement (repo) enters into a contractual agreement to purchase U.S. Treasury and government agency securities while simultaneously agreeing to resell the securities at predetermined dates and prices.
- d. Collateralized Public Deposits (Certificates of Deposit). Instruments issued by financial institutions which state that specified sums have been deposited for specified periods of time and at specified rates of interest. The certificates of deposit are required to be backed by acceptable collateral securities as dictated by state statute.

Certificates of deposit or other deposits of national banks located within the state and chartered banks under supervision provided such deposits are insured or collateralized as provided by the Oklahoma Security for Public Deposits Act.

Also allowable are Certificates of Deposit, which are fully insured by the Federal Deposit Insurance Corporation. Federally insured certificates of

deposit issued through the Certificate of Deposit Account Registry Service (CDARS) by financial institutions located in the United States, provided that the funds are initially invested by the jurisdiction through a financial institution that is participating in CDARS and that is located and doing business in Oklahoma; the financial institution in the state receives reciprocal deposits from customers of other financial institutions in an amount equal to the funds initially invested by the authority; and each such certificate of deposit is an amount that is eligible for full FDIC insurance coverage. The banks financial health should be checked through <http://research.fdic.gov/bankfmd>.

- e. Banker's Acceptances. Time drafts drawn on and accepted by a commercial bank, otherwise known as banker's acceptances. The County may invest in banker's acceptances issued by domestic commercial banks possessing the highest rating issued by Moody's Investor Services, Inc. or Standard and Poor's Corporation.
- f. Commercial Paper. The County may invest in commercial paper issued by domestic corporations, which has received the highest rating issued by Moody's Investor Services, Inc. or Standard and Poor's Corporation. Eligible paper is further limited to issuing corporations that have total commercial paper program size in excess of Five Hundred Million Dollars (\$500,000,000).
- g. Money market mutual funds regulated by the Securities and Exchange Commission and whose portfolios consist only of dollar-denominated securities.
- h. Local government investment pools either state-administered or developed through joint powers statutes and other intergovernmental agreement legislation.

2. Security Selection

The following list represents the entire range of United States Agency Securities that the County will consider, and which shall be authorized for the investment of funds by the County. Additionally, the following definitions and guidelines should be used in purchasing the instruments.

- a. **U.S Govt. Agency and instrumentalities Coupon and Zero-Coupon Securities.** Bullet Coupon Bonds with no embedded options.
- b. **U.S. Govt. Agency and instrumentalities Discount Notes.** Purchased at a discount with maximum maturities of one (1) year.
- c. **U.S. Govt. Agency and instrumentalities Callable Securities.** Restricted to securities callable at par only with final maturities of five (5) years.

- d. **U.S. Govt. Agency and instrumentalities Step-Up Securities.** The coupon rate is fixed for an initial term. At coupon date, the coupon rate rises to a new, higher fixed term. Restricted to securities with final maturities of five (5) years.
- e. **U.S. Govt. Agency Floating Rate Securities.** The coupon rate floats off one index. Restricted to coupons with no interim caps that reset at least quarterly.
- f. **U.S. Govt. Mortgage-Backed Securities.** Restricted to securities with final maturities of five (5) years.
- g. **Money Market Mutual Funds** regulated by the Securities Exchange Commission and whose portfolios consist only of dollar-denominated securities.
- h. **Local Government Investment Pools** either state-administered or developed through joint powers statutes and other intergovernmental agreement legislation.

3. Investment Restrictions and Prohibited Transactions

To provide for the safety and liquidity of County funds, the investment portfolio will be subject to the following restrictions

- a. Borrowing for investment purposes, “Leverage” is prohibited
- b. Instruments known as Structured Notes (e.g., inverse floaters, leveraged floaters and equity-linked securities) are not permitted. Investment in any instrument, which is commonly considered a “derivative” instrument (e.g., options, futures, swaps, caps, floors and collars), is prohibited.
- c. Contracting to sell securities not yet acquired in order to purchase other securities for purposes of speculating on developments or trends in the market is prohibited.
- d. No more that 5% of the total market value of the portfolio may be invested in banker’s acceptances issued by any one commercial bank and no more than 5% of the total market value of the portfolio may be invested in commercial paper of any on issuer.

4. Collateralization

Collateralization will be required on two types of investment: certificates of deposit and repurchase agreements. For certificates of deposit, the market value of collateral must be at least greater than the amount of certificates of deposits plus demand deposits with the depository, less the amount, if any, which is insured by the Federal Deposit Insurance Corporation, or the National Credit Unions Share Insurance Fund. All securities, which serve as collateral against the deposits of the depository

institution, must be safe kept at a non-affiliated custodial facility. Depository institutions pledging collateral against deposits must, in conjunction with the custodial agent, furnish the necessary custodial receipts within five business days from the settlement date. The County shall have a depository contract and pledge agreement with each safe-keeping bank, that will comply with the Financial Institutions, Reform, Recovery and Enforcement Act of 1989 (FIRREA). This will ensure that the County security interest in collateral pledged to secure deposits is enforceable against the receiver of a failed financial institution.

5. Repurchase Agreements

The securities for which repurchase agreements will be transacted will be limited to U.S. Treasury and government agency securities that are eligible to be delivered via the Federal Reserve's Fed wire book entry system. Securities will be delivered to the County designated Custodial Agent. Funds and securities will be transferred on a delivery vs. payment basis.

VII. Reporting

1. Methods

The investment officer shall prepare an investment report of the current investment portfolio and transactions made over the last quarter. This management summary will be prepared in a manner that will allow the County to ascertain whether investment activities during the reporting period have conformed to the investment policy. An investment report shall be issued at least annually to the governing body of the County.

2. Performance Standards

The investment portfolio will be managed in accordance with the parameters specified within this policy. The portfolio should obtain a market average rate of return during a market/economic environment of stable interest rates.

VIII. Policy Considerations

1. Exemption

Any investment currently held that does not meet the guidelines of this policy shall be exempt from the requirements of this policy. At maturity or liquidation, such monies shall be reinvested only as provided by this policy.

2. Adoption

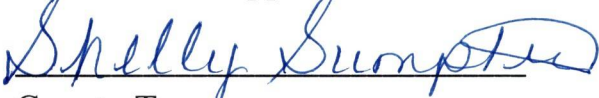
This policy shall be adopted by resolution of the County governing body. The investment officer shall review the policy annually and recommended changes will be presented to the governing body for consideration.

COUNTY STATUTORILY APPROVED INVESTMENT ENTITIES

Pursuant to FY27 Resolution Designating County Depository Banks, the following financial institutions are designated as the official depositories for Muskogee County deposits into demand accounts and investment purposes made by the County Treasurer:

Armstrong Bank	Muskogee, OK
Bancfirst	Muskogee, OK
Bank of Oklahoma	Muskogee, OK
Firststar Bank	Muskogee, OK
Mabrey Bank	Muskogee, OK

Submitted for approval,



County Treasurer

Adoption and Effective Date:

This Written Policy is formally adopted by the Muskogee County Board of County Commissioners and takes effect on the 1st day of July, 2026.

Approved this 22nd day of June, 2026.

Attest:


County Clerk

County Board of County Commissioners:


Chairman
Member
Member

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