

**INVESTMENT POLICY STATEMENT**

**FOR**

**THE PENNSYLVANIA PUBLIC SCHOOL EMPLOYEES'**

**RETIREMENT BOARD**

**INVESTMENT POLICY  
FOR  
THE PENNSYLVANIA PUBLIC SCHOOL EMPLOYEES' RETIREMENT BOARD**

The Public School Employees' Retirement Board (the Board) is responsible for the formulation of investment policy for the Public School Employees' Retirement Fund (the Fund). The Fund is the largest public pension fund in the Commonwealth of Pennsylvania and the custodian of the Fund's assets is the State Treasurer of the Commonwealth of Pennsylvania. The Board, as trustee for the Fund, has exclusive investment control and management of the Fund, subject to constraints set forth in Section 8521 (Prudent Person Legislation) of the Public School Employees' Retirement Code, 24 Pa. C.S. and the laws of the Commonwealth of Pennsylvania, and the interest of the taxpayers of this Commonwealth to support this Fund. As part of the Board's function, it has the responsibility for the implementation of investment policy, retention of investment advisors, and ongoing supervision of investment results. The Board is also responsible for establishing policies with respect to fees and commissions for all managers, investment advisors, and agents to the plan assets. In order to fulfill its responsibilities, it is the intention of the Board to review the Investment Policy at least annually.

Investment policy for the Fund relates to the portfolio of all assets which comprise the total holdings of the Fund. The Board recognizes that the objective of a sound and prudent policy is to produce investment results that will preserve the assets of the Fund, as well as maximizing earnings of the Fund consistent with its long-term needs. These long-term needs have been ascertained through various studies performed on behalf of the Board by its actuary. The reports provide in-depth analysis of the funding policies for the Public School Employees' Retirement System (the System). The investment policies herein set forth and the long-run average allocation of plan assets to which they refer are deemed to be consistent with the projected pattern of cash-flows to the plan and its projected benefit payments. Should either the projected finances of the System change significantly, changes in applicable Federal or State statutes dictate, or changes in the plan's asset valuation methods be adopted, these policies and average asset allocations will be reviewed and modified by action of the Board, if appropriate. The Investment Policy represents policy for the entire Fund, which for the purposes of investment management and control is divided into portfolios that contain similar assets or for which the Board has retained a specific investment advisor. Detailed guidelines for each of these portfolios have been constructed so that they collectively implement policy for the entire Fund.

**Investment Objectives**

The long-term investment objectives of the Fund are:

1. Preservation of capital in real terms;
2. To maximize total returns while limiting the risk of volatility through diversification;
3. To achieve total returns in excess of the policy index (the policy index is a custom index created based on the Board established asset allocation structured to generate a return that meets the actuarial rate of return assumption);
4. To achieve a real rate of return over CPI over time; and

5. To provide sufficient liquidity to meet the current operating needs of the Fund.

### Asset Allocation

The Board will review long-term asset allocation targets at least annually. The Board will seek the opinion of its actuary, consultants, staff, and any other sources of information it deems appropriate in formulating this allocation. The purpose of the Board's long-term asset allocation is to achieve diversification, or a combination of expected return and risk, that is consistent in meeting the near and long-term financial needs and objectives of the Fund.

The following are the long-term top-down asset allocation targets of the Board, based on the market value of the Fund's assets:

<u>ASSET CLASS</u>	<u>SUB-CLASS OBJECTIVE</u>	<u>6/06 OBJECTIVE</u>	<u>POLICY RANGE</u>
Large Cap	<del>32.0</del> <u>24.0</u> %		<del>29.0</del> <u>20.0</u> % - <del>35.0</del> <u>28.0</u> %
SMID Cap	<del>7.0</del> <u>25.4</u> %		<del>5.0</del> <u>24.4</u> % - <del>9.0</del> <u>26.4</u> %
Micro Cap	<del>0.0</del> <u>800.6</u> %		<del>0.0</del> <u>3040</u> % - <del>1.0</del> <u>300.8</u> %
<b>U.S. Equity Exposure*</b>		<b><u>40.0</u><del>30.0</del>%</b>	<b><u>37.5</u><del>25.0</del>% - <u>43.5</u><del>35.0</del>%</b>
Non-U.S. Large Cap	<del>17.0</del> <u>24.0</u> %		<del>14.0</del> <u>20.0</u> % - <del>20.0</del> <u>28.0</u> %
Non-U.S. Small Cap	<del>1.5</del> <u>3.0</u> %		<del>0.5</del> <u>2.0</u> % - <del>2.5</del> <u>4.0</u> %
Emerging Markets	<del>1.5</del> <u>3.0</u> %		<del>0.5</del> <u>2.0</u> % - <del>2.5</del> <u>4.0</u> %
<b>Non-U.S. Equity Exposure*</b>		<b><u>20.0</u><del>30.0</del>%</b>	<b><u>17.5</u><del>25.0</del>% - <u>23.5</u><del>35.0</del>%</b>
<b>Total Public Market Equity Exposure</b>		<b>60.0%</b>	<b>57.0% - 63.0%</b>
<del>Private Debt</del>	<del>3.00</del> %		
<del>Private Equity/Venture Capital</del>	<del>8.00</del> %		
<b>Alternative Investments</b>		<b>11.0%</b>	
<b>Real Estate (including publicly-traded REITs)</b>		<b><u>7.0</u>%</b>	<b>5.0% - 9.0%</b>
<b>Total Equity Exposure</b>		<b>78.0%</b>	<b>75.0% - 81.0%</b>
TIPS	<del>5.00</del> %		<del>3.50</del> <u>5.00</u> % - <del>6.50</del> %
Domestic Fixed Income	<del>12.60</del> %		<del>10.60</del> <u>10.60</u> % - <del>14.60</del> %
Global Fixed Income	<del>3.30</del> %		<del>1.80</del> <u>1.80</u> % - <del>4.80</del> %
High Yield	<del>1.10</del> %		<del>0.10</del> <u>0.10</u> % - <del>2.10</del> %
Cash	<del>0.00</del> %		<del>(3.00)</del> <u>0.00</u> % - <del>3.00</del> %
<b>Total Fixed Income Exposure</b>	<b><u>22.0</u>%</b>	<b>19.0% - 25.0%</b>	
<b>Commodity Exposure*</b>		<b>0.0%</b>	<b>0.0% - 7.0%</b>

\* - the Board has approved an allocation of 5.0% to commodities to be funded equally from U.S. and non-U.S. equity exposure. This allocation is to be implemented over the next 12 to 18 months. Capital committed to commodities will be raised from U.S. and non-U.S. equities. For example, if 1.0% of the fund is allocated to commodities in a quarter, then 0.50% will be funded from the U.S. equity allocation and 0.5% will be funded from the non-U.S. equity allocation. This process will continue until 5.0% has been allocated to commodities and the allocation to U.S. equity drops to 27.5% and the allocation to non-U.S. equity drops to 27.5%.

The targets established above are long-term targets. Implementation of any private market strategies in real estate and alternative investments are, at a minimum, three to five year targets.

Developmental Fund – the Developmental Fund has a target allocation of 1.5% with a policy range of 0.0% to 2.0%. The advisor’s objectives will determine where the manager is included in the overall asset allocation of the Fund.

For purposes of this analysis, cash and cash equivalents held in each advisor’s portfolio will be considered fully invested based on that advisor’s objectives (i.e. cash in a domestic equity advisor’s account will be considered as part of the domestic equities in the table above). Cash equivalents include fixed income securities maturing in less than one year for classification purposes.

### Policy Index

Based on the asset allocation noted above, the Board has adopted the following weighted policy benchmark to measure the performance of the Fund for the fiscal year beginning July 1, ~~2005~~2006:

DJ Wilshire 5000 Index	4030.0%**
MSCI ACW Index ex. U.S. (gross dividends), <u>30% hedged</u>	<u>2030.0%**</u>
Lehman Aggregate Index	13.7%
Lehman U.S. TIPS Index	5.0%
Lehman Global Aggregate Index	3.3%
Wilshire Real Estate Securities Index	1.4%
NCREIF Index, one-quarter lagged	5.6%
Venture Economics Median, one-quarter lagged*	11.0%
<u>DJ/AIG Commodity Index</u>	<u>0.0%**</u>
Total	<u>100.0%</u>

\* - the Venture Economics Median returns will be calculated on a weighted vintage year basis that will account for the timing of commitments made by the Fund.

\*\* - as the commodity allocation is funded, the benchmark will be revised to reflect this funding. For example, if 1.0% of fund is allocated to commodities in the first quarter, then starting with the second quarter the Policy Index will include this 1.0% DJ/AIG Commodity Index and the DJ Wilshire 5000 Index will be reduced by 0.5% and the MSCI ACW Index ex. U.S. (gross dividends), 30% hedged benchmark will also be

reduced by 0.5%. This process will continue until 5.0% has been benchmarked to commodities (DJ/AIG Commodity Index) and the benchmark to U.S. equity (DJ Wilshire 5000 Index) drops to 27.5% and the benchmark to non-U.S. equity (MSCI ACW Index ex. U.S. (gross dividends), 30% hedged) drops to 27.5%.

## **Investment Structure**

Annually, the Board approves the investment structure as presented by the general investment consultant. The investment structure includes, among other things, the managers approved by the Board as well as the pro forma targets as a percentage of the total fund by manager. These target percentages represent the portion of the total fund allocated to each manager for investment management. Staff shall, as able and within a reasonable period of time, implement the investment structure based on the pro forma target percentages approved by the Board within plus or minus 20% of the target allocation or plus or minus 1.0%, whichever is less. The Chief Investment Officer shall have discretion in implementing changes that are less than 25 basis points (0.25%), taking into account transactions costs and liquidity.

Staff shall endeavor to invest any underweight to private real estate in public real estate securities until such a time as the money is allocated to and invested by a private real estate fund. In addition, Staff shall endeavor to invest any underweight in alternative investments (private debt, private equity, and venture capital) in public equities until the money is allocated to and invested by an alternative investment fund. Should either private real estate or alternative investments be overweight versus target, then Staff shall endeavor to invest such overweight from the public real estate securities/public equities allocation.

## **Asset Class Rebalancing**

The asset allocation will be reviewed on a regular basis, but no less frequently than monthly, for potential rebalancing. Any asset class allocation that falls outside the policy ranges described above will be rebalanced to within the policy range, but in no cases beyond the target allocation objective, within a reasonable period of time by the Chief Investment Officer.

Asset allocation rebalancing may be accomplished by using the cash markets or through the use of derivative securities. Derivative securities may only be used to implement temporary adjustments. Where feasible, index funds will be used to facilitate rebalancings to minimize the time frame and costs. However, any account may be increased or decreased to achieve the rebalancing objective based on the judgment of the Chief Investment Officer. When a rebalance is triggered, consideration will be given to the unique characteristics of each asset class, the degree of over/underweight, liquidity characteristics, current market conditions, and any other relevant considerations to ensure prudence and care.

The purpose of this structured reallocation policy is to provide a disciplined approach to asset allocation. All rebalancings will be reported to the Board at the next scheduled meeting.

## **Termination of Investment Managers**

The Chief Investment Officer, after receiving concurrence from the Executive Director and the Chair of the Finance Committee, and notifying the Board, has authority to terminate an investment manager for any valid business reason, including, but not limited to, poor performance, personnel changes, organizational changes, deviation from their investment

style, and compliance violations. Notwithstanding the preceding, any individual Board member has the right to request to have the termination decision listed on the agenda of the next scheduled Finance Committee Meeting. Pending said Finance Committee meeting, no action shall be taken by the Chief Investment Officer to terminate the investment manager. The Chief Investment Officer shall inform the Board of the status of the termination at the next scheduled Board meeting. Upon the termination of any investment manager, the Chief Investment Officer has the authority to reinvest the proceeds from the terminated manager with any remaining investment manager(s) previously approved by the Board and/or keep the proceeds in the Fund's cash management account.

### **Interest, Dividend, and Other Miscellaneous Income Earned**

Interest, dividend, and other miscellaneous income earned each month will be swept from each account one month and one business day after the month in which it was earned (for example, income earned in December will be swept from the accounts on the first business day in February). The amount to be swept shall be determined monthly through the reconciliation process with the custodial bank and/or the Fund as administered by the Investment Accounting Office. The Chief Investment Officer shall have discretion to waive this provision for any manager.

### **Investment Management Fees**

Investment management fees will be submitted to the Fund on a quarterly basis. Once approved by the Fund, the fees will be paid directly out of the investment manager's account as administered by the Investment Accounting Office. The Chief Investment Officer shall have discretion to waive this provision for any manager.

### **Index Portfolio Rebalancing**

Throughout the year, the index portfolios need to rebalance positions to minimize the tracking error of the portfolios. At times, rebalancing may lead to inefficient buying and selling of securities. To minimize the costs associated with rebalancing the portfolios, the Chief Investment Officer shall have discretion to fund the internally managed index accounts, as necessary, with additional cash.

### **Cash**

The Fund currently has cash outflows (primarily benefits) in excess of cash inflows (primarily contributions and investment income). In addition, frictional cash is minimized in the Fund through the commingling of the cash in various investment portfolios and reallocation of excess cash through the asset allocation plan. Therefore, there will be various points in time where the Chief Investment Officer will need to increase cash through allocation reductions to meet the cash needs of the Fund. As such, the Chief Investment Officer shall have the discretion to raise cash from any of the public market equity or fixed income portfolios as he considers prudent. The Chief Investment Officer shall consider the current positioning of the asset allocation, liquidity, cost, etc. in determining where to raise cash. Prior to raising cash, the Chief Investment Officer will inform the Board either by email or at the next scheduled Board meeting depending on the timing and need. The Chief Investment Officer shall inform the Board of any allocation reductions at the next scheduled Board meeting.