

DEBT MANAGEMENT

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| BP No. 6323 |
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Board Adopted: NEW, Drafted: 3/13/19

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This policy is legally required on the advisement of Bond Counsel.

I. Introduction

The Board of Trustees recognizes the importance of having Debt Management Policies (the “Debt Policies”) that provide a framework for public finance borrowing. The Debt Policies provide guidelines for public finance borrowings, ensure careful and consistent monitoring and use of debt issuances and structures, establish debt management goals and help attain the best credit ratings, preserve financial flexibility, meet all capital requirements, and guide the investment of bond proceeds.

The Board of Trustees, prior to issuance, must authorize the issuance of any of the following types of debt obligations of the District:

- General Obligation Bonds (“G.O. Bonds”)
- Bond anticipation notes (“BANs”)
- Lease-purchase agreements (“Leases”)
- Certificates of participation (“COP”)
- Tax and revenue anticipation notes (“TRANS”)
- Other issuance that constitutes debt under the California constitution

Debt Policies set forth herein have been developed to provide guidelines for such issuance and other forms of indebtedness.

While the issuance of debt by the District is an appropriate and necessary method of financing capital projects, careful and consistent monitoring of such debt issuance is required to preserve the District’s credit strength, budget and financial flexibility. These Debt Policies will serve the District in determining the appropriate uses for debt financing, debt structures and establishing prudent debt management goals.

Compliance with State and Federal Law. The District shall maintain such records regarding the District’s debt issues as may be required pursuant to the Internal Revenue Code (the “Tax Code”) and pertinent regulations, including, without limitation, information required to calculate arbitrage rebate due to the U.S. Department of the Treasury, and to ensure compliance with the District’s continuing disclosure obligations incurred pursuant to Rule 15c2-12 of the Securities and Exchange Commission.

II. Policy Goals

The purpose of the Debt Policies is to provide functional tools for debt management and capital planning, as well as to enhance the District’s ability to manage its debt and lease financings in a conservative and prudent manner. In following these Debt

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Policies, the District shall pursue the following goals:

- The District shall strive to fund capital improvements from referendum-approved bond issues to preserve the availability of its General Funds for District operating purposes and other purposes that cannot be funded by such bond issues.
- The District shall endeavor to attain the best possible credit rating, as applicable, for each debt issue (with or without bond insurance) in order to reduce interest costs, within the context of preserving financial flexibility and meeting capital funding requirements.
- The District shall take all practical precautions and proactive measures to avoid any financial decision which will negatively impact current credit ratings on existing or future debt issues.
- The District shall remain mindful of debt limits in relation to assessed value growth within the District and the tax burden needed to meet long-term capital requirements.
- The District shall consider market conditions and District cash flows when timing the issuance of debt.
- The District shall determine the amortization (maturity) schedule which will best fit with the overall debt structure of the District at the time the new debt is issued.
- The District shall give consideration to matching the term of the issue to the useful lives of assets whenever practicable, while considering repair and replacement costs of those assets to be incurred in future years as an offset to the useful lives, and the related length of time in the payout structure.
- The District shall, when planning for the issuance of new debt, consider the impact of such new debt on overlapping debt and the financing plans of local, State and other governments which overlap with the District.
- The District shall, when issuing debt, assess financial alternatives to include new and innovative financing approaches, including whenever feasible categorical grants, revolving loans or other State/Federal aid, so as to minimize the encroachment on the District's General Fund.
- In order to minimize the encroachment on the District's General Fund when issuing debt, the District will clearly identify the sources of repayment.

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III. Authorization and Purpose for Debt

The laws of the State of California authorize the issuance of debt by the District, and confer upon it the power and authority to make lease payments, contract debt, borrow money, and issue bonds for public improvement projects. Under these provisions, the District may contract debt to: pay for the cost of acquiring, constructing, reconstructing, rehabilitating, replacing, improving, extending, enlarging, furnishing and equipping such projects; to refund existing debt; or to provide for cash flow needs.

IV. Alignment with District's Capital Improvement Program and Budget

Decisions regarding the issuance of debt for the purpose of financing capital improvements shall be aligned with current and prospective needs for acquisition, construction and/or improvement of District property and facilities as identified by the District through sources and information including the District's facilities master plan or other needs assessment, as applicable, the projected costs of those needs, schedules for the projects, and anticipated resources.

When considering a debt issuance, the Board, Superintendent/President and the Vice President, Business/Administration or designee shall consider both the short-term and long-term implications of the debt issuance and additional operating costs associated with new projects. Such evaluation may include, but is not limited to, the projected ratio of annual debt service and tax burden on the District's taxpayers, and the ratio of annual debt service secured by the general fund to general fund expenditures.

V. Post Issuance Review and Update

The Debt Policies shall be reviewed and updated before and after each bond issuance and made available to the Board for review. The Vice President, Business/Administration or his or her designee is the designated administrator of the Debt Policies and has the overall responsibility, with the Board's approval, for decisions related to the structuring of all of the District's debt issues. The Vice President, Business/Administration or his or her designee may delegate the day-to-day responsibility for managing the District's debt and lease financings. The Board is the obligated issuer of all District debt and awards all purchase contracts for G.O. Bonds, COPs, TRANs, County Loans and any other debt issuances.

VI. Internal Control Procedures

The District has implemented certain internal control procedures to ensure that the proceeds of its debt issuances will be directed to their intended use. Such internal control procedures include, but are not limited to, more detailed Administrative Regulations related to Debt Issuance, Policies and Procedures related to Post-

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Issuance Tax Compliance for the District's tax-exempt issues, whether comprising G.O. Bonds, BANs, COPs, TRANs, County Loans, revenue obligations or other forms of debt issuances, and Continuing Disclosure guidelines. Tax Compliance may include Compliance Monitoring, Record Creation and Retention, the designation of Compliance Officers and other protocols designed to ensure that proceeds of the District's debt issuances will be directed to their intended use.

VII. Special Situations

The District acknowledges that the capital marketplace fluctuates, and such fluctuations may produce situations not anticipated or covered by this policy. Accordingly, the Board may make exceptions or modifications to this policy to achieve the debt management goals outlined herein. Management flexibility is appropriate and necessary in such situations, provided specific authorization is granted by the Board.

VIII. Source/References:

Ann La Morena Rohlin, Partner, Norton Rose Fulbright, US, LLP
District Bond Counsel