CONFIDENTIAL PROGRAM POLICY FRAMEWORK

Agricultural Renewal Trust

Program Eligibility, Assistance, and Payment Framework

Need determination, exclusions, payments, and gray-area guidance

Operating-development draft: August 22, 2026

Confidential - Internal Program and Financial Information - Not for Public Distribution

> Document status. This is a working policy document for the Initial Trustee, development managers, future operating fiduciaries, counsel, the CPA, and other authorized advisors. It records the intended program boundaries and decision standards but does not activate a Program, approve a case, or replace the Trust Agreement, authority schedule, case forms, assistance agreements, or professional advice.

Purpose and Intended Use

This framework brings the decisions already made about the three Trust Programs into one working document. It explains who may be considered, how agricultural and financial need are determined, what ordinarily does not qualify, how assistance and payments may be structured, and how difficult cases should be handled.

The agricultural and financial development managers will turn this direction into workable procedures with advice from counsel, the CPA, the banker, risk advisers, and specialists. They may recommend changes, but the Trust must expressly approve any change to the purpose or core decision standards.

Basic promise. The Trust will make a serious effort to help a qualifying agricultural operation solve a documented problem when help is truly needed. At the same time, it must guard against favoritism, duplicate recovery, avoidable loss, and payment of costs the operation can reasonably bear.

No automatic award. A breakdown, disruption, sound project, or completed application permits evaluation; it does not create a right to Trust money. Funding requires an agricultural finding, a financial finding, proper authority, available funds, and appropriate terms.

Respectful verification. Start with the operator's explanation and verify the facts that matter. Verification protects the fund; it is not an accusation. The review should be no more intrusive than the size, complexity, and risk of the case require.

The Three Programs at a Glance

Program	Condition being addressed	Primary purpose	Timing
Essential Operations Assistance	A specific failure or imminent failure of an existing essential operating function.	Prevent a material interruption or restore current operating capacity.	Time-sensitive; cannot reasonably wait through ordinary resource coordination.
Agricultural Emergency and Business Disruption Recovery	A serious event outside ordinary operating control has already interrupted or materially reduced operations.	Stabilize the operation, protect essential assets and workforce, and carry out a reasonable restoration plan.	Emergency stabilization followed by monitored recovery.

Program	Condition being addressed	Primary purpose	Timing
Agricultural Resource and Gap Assistance	A sound agricultural need exists but does not require immediate stabilization.	Coordinate available resources and address a documented remaining gap when outside resources are unavailable, incomplete, unsuitable, or too slow.	Normal evaluation and resource coordination can occur without material interruption.

Program classification follows the condition being addressed, not the type of payment requested. One case may contain linked needs under more than one Program, but it should have one primary classification, one coordinated solution, and one case record so assistance is not duplicated.

Core Terms

Qualifying agricultural operation. A legitimate farm, ranch, dairy, producer, or independent agricultural business within the activated service area and approved ownership and size standards. A supplier, processor, cold-storage operation, transporter, veterinarian, repair business, or other related business qualifies only when its work is directly and substantially connected to agricultural production or to qualifying independent producers.

Qualified agricultural need. A verified condition that fits an activated Program, materially affects or threatens a qualifying operation, and has a reasonable solution consistent with the Trust's purpose. It establishes eligibility for a decision, not an entitlement to money.

Reasonable viability. A supportable conclusion that the operation can continue or recover if the identified problem is corrected. Perfect finances are not required, but assistance must do more than postpone failure when no credible recovery plan exists.

Material financial gap. The portion of an approved need that the operation cannot reasonably pay or finance without materially impairing essential operations, required working capital, normal payroll and existing benefits, necessary inputs, or other obligations needed to continue through the next reasonably expected revenue period.

Ordinary cost of doing business. A repair, deductible, maintenance expense, financing cost, or temporary cash-flow reduction that the operation can absorb while meeting essential obligations. Wanting to preserve cash, avoid interest, maintain a preferred cushion, or protect profit does not create a material financial gap.

Applicant contribution. The portion of the approved cost that the operation can reasonably provide without causing material operational impairment. It may include cash and, when appropriate and verifiable, usable materials, safe owner labor, equipment, transportation, insurance or warranty proceeds, or other resources that reduce the actual project cost.

Assistance method. The form in which an approved financial gap is addressed, such as resource coordination, shared-cost assistance, nonrecoverable assistance, conditional assistance, temporary stabilization, staged payment, or an authorized recoverable bridge.

Who May Be Considered

An operation may proceed to full evaluation when the preliminary record reasonably indicates all of the following:

- It is a legitimate agricultural operation or directly related independent business covered by the activated policy.
- It is in Pontotoc County, another activated service area, or an area covered by an approved exception.
- Its ownership, control, and scale fit the approved focus on smaller independent domestic operations rather than large industrial or corporate enterprises.
- The condition is real, fits an activated Program, and has a meaningful effect on the operation or a sound agricultural need.
- A workable solution appears possible, and the operation is willing to provide needed information, disclose other resources, follow approved conditions, and permit completion verification.

Legal form alone does not decide eligibility. A sole proprietorship, partnership, family entity, tenant operation, or other legitimate structure may be considered if the file establishes the business, its operating rights, responsibility for the need, and authority to perform the work. Leased or jointly used property may require owner consent and a fair allocation of the approved benefit.

The Five Required Gates

Gate	Required question	If the gate is not satisfied
1. Operation	Is the applicant a qualifying agricultural operation or directly related agricultural business within the activated service area?	Refer, defer, or decline unless a permitted geographic or eligibility exception applies.
2. Program need	Is there a verified condition that fits one or more activated Programs and has a material agricultural or business effect?	No case funding. Information or referral may still be offered.
3. Viability and solution	Will the proposed work reasonably correct, stabilize, or restore the condition, and is the operation reasonably capable of continuing?	Narrow the solution, obtain specialist advice, stabilize only what must be protected, or decline.
4. Financial gap	After reasonable applicant resources and outside assistance are considered, is there a material financial gap?	The cost remains the operation's responsibility; resource coordination may continue.
5. Authority and payment	Are funds available, both required approvals documented, recipient and terms verified, and the payment route authorized?	Do not promise, commit, or release Trust money.

What Ordinarily Does Not Qualify for Trust Money

The following conditions ordinarily result in referral, deferral, or denial of Trust payment. They should be applied with judgment; a listed condition may be part of a larger eligible matter, but it does not by itself justify funding.

- The operation can pay the cost or obtain timely, affordable credit without impairing essential operations. Preserving a preferred cash balance, avoiding normal interest or fees, or protecting profit is not enough.
- The work is cosmetic, elective, convenience-driven, or primarily an expansion, upgrade, capacity increase, or speculative investment rather than a reasonable correction of the documented need.
- The requested amount is for unrestricted working capital, owner draws, personal living expenses, unrelated debt, lost profit, or another use not tied to an approved agricultural solution. Properly limited emergency workforce support is addressed separately.
- The same cost is fully available from insurance, a warranty, a responsible party, a government or tribal program, a manufacturer, a lender, or another source on terms and timing that reasonably meet the need.
- The proposed repair or payment would only delay likely failure, and there is no credible recovery, restructuring, transition, or responsible closure plan.
- The operation refuses information needed to verify the need, cost, financial gap, authority, payment route, conflicts, expected reimbursement, or completion.
- The request involves intentional damage, unlawful activity, unsafe or unlicensed work where qualification is required, material misrepresentation, diversion of earlier assistance, or an unresolved related-party conflict.
- A recurring problem is being presented repeatedly without reasonable corrective action, maintenance, management change, or another plan to address the cause.
- The operation falls outside the activated agricultural, ownership, size, or geographic standards and no authorized exception applies.

Incomplete is not always declined. If a case may qualify, missing information usually calls for a clear request, a time-limited deferral, a narrow protective action, or help from a trusted advisor instead of an immediate final denial.

How Agricultural Need Is Determined

The agricultural review determines what happened, why it matters, and what solution makes sense. The applicant's requested repair, replacement, amount, or Program label is a starting point, not the answer.

- Identify the failed, interrupted, threatened, or missing agricultural function and its likely cause.
- Determine the current operating effect and what is likely to happen, and when, if no action is taken.
- Distinguish an isolated problem from deferred maintenance, chronic undercapitalization, a management issue, a broader system failure, or another root cause.

- Determine whether the operation can continue and whether the proposed work will actually solve the problem.
- Consider safe temporary workarounds, repair, replacement, rental, alternate providers, staged work, and other practical solutions.
- Use site visits, photographs, records, estimates, production information, and qualified specialists in proportion to the problem.
- Define the eligible work, reasonable cost, provider qualifications, completion standard, and any needed follow-up.

Agricultural approval does not decide financial assistance. A sound repair or recovery plan establishes the eligible work and cost. The financial review still decides whether the operation should pay all, pay part, use another resource, receive nonrecoverable assistance, or receive an authorized recoverable bridge.

How Financial Need Is Determined

The financial review determines whether there is a real funding gap and, if so, the amount and form of help needed. It is not a search for every asset the owner possesses or an effort to make the operator prove poverty. The question is whether paying the cost would impair the operation's ability to continue.

The financial review should consider, as relevant:

- Available business cash after protecting a supportable amount for essential operations through the next expected revenue period.
- Seasonal income and expenses, receivables, committed contracts, required inputs, ordinary payroll and existing benefits, utilities, debt service, taxes, and other obligations necessary to continue.
- An owner contribution and resources of related entities, but only when those resources are connected to the operation and actually available.
- Insurance, warranties, manufacturer responsibility, responsible parties, federal, state, local, and tribal programs, disaster resources, educational or technical resources, and other assistance.
- Ordinary credit, an existing operating line, payment terms, or short-term financing, including the real effect of timing, collateral, fees, and interest.
- The applicant's proposed contribution, prior assistance, recent distributions or transfers, repeat requests, and any important inconsistency or warning sign.
- The effect of the proposed commitment on the Trust's available program capital and ability to respond fairly to other cases.

The review should not ordinarily require liquidation of productive farmland, essential equipment, breeding livestock, a primary residence, or retirement assets. Asset ownership may still be relevant to liquidity, ordinary credit, related-party transactions, or viability, but an asset-rich operation should not be treated as having immediate cash merely because it owns productive property.

Applicant Contribution and Ability to Pay

No fixed percentage should be applied to every operation. The applicant contribution should be the amount the operation can reasonably provide after essential obligations and a supportable operating reserve are protected. The method should use consistent factors while allowing agricultural seasonality, livestock needs, weather, production cycles, and committed revenue to be considered.

Financial result	Usual assistance direction	Required explanation
Can reasonably pay all	No Trust payment; resource information may be provided.	Why payment or ordinary financing will not materially impair essential operations.
Can reasonably pay part	Shared-cost assistance or staged applicant contribution.	How the contribution was calculated and why a larger amount would cause material impairment.
Temporary timing gap with reliable repayment source	Authorized recoverable bridge, direct provider payment, or short deferral.	Repayment source and date, financing alternatives, risk if delayed, and written terms.
Cannot reasonably contribute	Full or substantially full nonrecoverable or conditional assistance if all other gates are satisfied.	Why available resources are insufficient and why the assistance remains a sound use of Trust funds.
Capacity is uncertain	Obtain focused information; consider a limited, staged, or protective commitment.	What is uncertain, what would resolve it, and what loss the limited action prevents.

Proportionate Verification

Ask only for what is needed to make and protect the decision. Larger, more complex, repeat, recoverable, related-party, or questionable cases require more verification. Telephone, paper, in-person, and trusted-advisor participation should remain available; a public portal or complex digital application is not required.

Review level	Typical use	Examples of information
Limited / urgent	Clear, time-sensitive, lower-risk need or immediate protective action.	Identity and operation verification; problem confirmation; estimate or provider confirmation; brief cash and resource statement; emergency authority record.
Standard	Most ordinary cases and shared-cost decisions.	Ownership or operating rights; agricultural evaluation; estimates; seasonal cash-flow summary; selected bank or accounting records; insurance, warranty, credit, and resource status; applicant contribution.

Review level	Typical use	Examples of information
Enhanced	Large, complex, repeat, recoverable, related-party, mixed-use, inconsistent, or higher-risk case.	Financial statements or tax information as relevant; accountant or lender confirmation; related-entity information; specialist reports; ownership and conflict records; repayment and collateral review if activated.

Informal records are not an automatic disqualification. With the operator's permission, a trusted accountant, banker, purchaser, veterinarian, insurance agent, attorney, supplier, or other advisor may help confirm the facts. Personal information is needed only when business and personal finances are intertwined or another documented reason requires it.

Good payment and completion controls may protect the Trust better than collecting unnecessary financial records. Tell the applicant what is needed, why it is needed, who will see it, and what happens if it cannot be provided.

Two-Key Review and Joint Recommendation

Agricultural review determines	Financial review determines	Joint recommendation states
Actual problem and cause; primary Program; urgency; material operating effect; viability; sound solution; specialist need; eligible scope and cost; completion standard.	Material financial gap; applicant contribution; outside resources; assistance method; Trust reserve effect; recipient and payment route; financial conditions; accounting and recovery needs.	Approved work; total cost; applicant contribution; Trust amount or limit; assistance form; payee; conditions; timing; monitoring; completion evidence; reimbursement or repayment expectation.

The two reviews answer different questions: Is the work needed and sound? How, if at all, should the Trust help pay for it? The agricultural reviewer cannot approve Trust money merely because the work is important, and the financial reviewer cannot replace a sound solution with a cheaper one that will not work. Both findings must be documented before funds are committed, except for a narrowly authorized protective payment.

If the reviewers disagree, approval pauses while they identify the point of disagreement, obtain the facts or specialist advice needed, and consider a narrower, staged, or temporary solution. Only an exceptional unresolved dispute should go to the person or office named in the governing documents.

Program 1 - Essential Operations Assistance

Purpose. Prevent a material interruption or restore current capacity when a specific existing operating function has failed or is likely to fail before ordinary resource coordination can reasonably be completed.

In addition to the five required gates, the case should establish:

- The exact essential function, asset, service, or system that has failed or is in imminent danger of failure.

- What will happen, and how soon, if it is not corrected, including any safety, animal-welfare, production, spoilage, workforce, or contract consequences.
- Whether a safe temporary workaround, rental, alternate provider, repair, replacement, or staged solution is available and appropriate.
- The work needed to restore or preserve current capacity, its cost and timing, and any maintenance or corrective conditions.

Typical assistance may include diagnosis, emergency rental, repair, necessary replacement, parts, materials, qualified labor, transportation or delivery, temporary operating arrangements, and related specialist work. Replacement may be chosen when repair is unavailable, unsafe, excessively slow, or not economically sound.

A broken piece of equipment is not by itself a reason for the Trust to pay. Routine maintenance, an affordable repair, elective upgrades, added capacity, cosmetic work, and a preferred replacement when a sound lower-cost correction will do are ordinarily the operator's responsibility.

Boundary with Resource and Gap Assistance. If the operation can safely continue while insurance, a manufacturer, a lender, a government or tribal program, or another resource is evaluated in the normal course, the matter generally belongs in Resource and Gap Assistance. If waiting creates a material interruption, Essential Operations may provide the immediate component while resource coordination continues for the balance.

Program 2 - Agricultural Emergency and Business Disruption Recovery

Purpose. Stabilize and restore a viable operation after a serious event outside ordinary operating control has already interrupted or materially reduced operations.

In addition to the five required gates, the case should establish:

- The event, affected property or functions, immediate hazards, and actual operating interruption or reduction.
- What must be done now to prevent further loss, protect people or animals, preserve essential assets, maintain access, or meet critical obligations.
- A practical stabilization and restoration plan, estimated recovery period, costs, providers, outside resources, and completion milestones.
- A reasonable path to recovery, including what insurance, responsible parties, government or tribal programs, lenders, manufacturers, or disaster organizations are expected to provide.

Assistance may cover protective work; debris removal needed for access or repairs; temporary power, water, feed, shelter, transportation, or storage; repair or replacement; and necessary specialist services. Nonurgent work may wait for the responsible payer or normal restoration schedule.

Temporary workforce assistance may cover normal payroll and existing employer benefits when a documented interruption would otherwise cause the operation to lose employees needed for recovery. Pay it through the employer's business or payroll and benefit administrator, set a defined recovery period, and review it regularly. It cannot be used for bonuses, owner distributions, or permanent operating support.

The Trust should coordinate with insurers, lenders, government agencies, and responsible parties without replacing their obligations or allowing its assistance to reduce what another party properly owes. Later proceeds are handled under the Completion, Reimbursements, and Recoverable Assistance section.

Program 3 - Agricultural Resource and Gap Assistance

Purpose. Address a sound agricultural need that can undergo normal evaluation without immediate stabilization by coordinating available resources and addressing a documented remaining gap when appropriate.

In addition to the five required gates, the review should identify:

- The agricultural need, operating benefit, proposed solution, timing, cost, and reason it is sound for the existing operation.
- Insurance, warranties, lenders, manufacturers, suppliers, federal, state, local, and tribal agricultural or disaster programs, foundations, qualified relief organizations, educational and technical resources, and other available assistance.
- Which resources can help, when they can help, and what part of the need will remain.
- The applicant's contribution, the remaining financial gap, and why the proposed Trust assistance is the responsible solution.

Do not require pointless applications. If a commonly expected resource is inapplicable, unavailable, too slow, or financially harmful, note the reason in the case file. Resource coordination must not turn a known problem into an avoidable emergency.

Trust money is not justified merely because it is cheaper than commercial financing. Timely, affordable credit remains a normal business resource when using it will not impair operations. A Trust bridge may be considered when a reliable repayment source exists but lender timing, collateral, or cost would create an operating threat the bridge would solve.

Selecting the Form of Assistance

Match the assistance to the actual gap. Use no more Trust money or restriction than the case requires.

Assistance form	When it may fit	Main safeguards
Resource coordination or referral	The need is legitimate but another suitable resource can meet it or additional expertise is needed.	No promise that the outside resource will approve; track time-sensitive referrals when delay matters.
Shared-cost assistance	The operation can reasonably pay part but not all of the eligible cost.	Document the contribution method, timing, proof, and effect of cost changes.
Nonrecoverable assistance	A material gap exists and repayment is not appropriate or reasonably supportable.	Plainly state that the approved amount is not debt; use restrictions, direct payment, milestones, and completion review.

Assistance form	When it may fit	Main safeguards
Conditional assistance	Payment is justified only if specified actions occur, such as maintenance, insurance, owner consent, matching funds, or completion milestones.	Conditions must be reasonable, written, measurable, and connected to the identified risk or purpose.
Temporary stabilization	A limited action is needed to prevent greater loss while the complete problem and recovery plan are evaluated.	Narrow scope, short duration, spending cap, no implied approval of the full case, and prompt reassessment.
Staged or milestone payment	Work is complex, uncertain, or performed in phases.	Pay only after defined evidence; control deposits, change orders, retainage when appropriate, and unused funds.
Recoverable bridge	A reliable receivable, insurance payment, government reimbursement, contract payment, or other source is expected, but timing creates a material gap.	Must be activated, legally and financially reviewed, agreed in writing before payment, and never imposed later on nonrecoverable assistance.

Loans, secured capital, guarantees, liens, equity, acquisitions, and joint ventures should remain inactive unless they are separately authorized after legal, tax, accounting, banking, and risk review. Calling an arrangement a bridge, advance, or recoverable assistance does not avoid the need to determine its actual legal and financial treatment.

Payment and Recipient Rules

Use the simplest authorized payment route that clearly ties the money to the approved work. Direct provider payment is normally preferred, but another approved route may be used when it is more practical and can be properly controlled.

Approved payment routes may include:

- Direct payment to a repair firm, manufacturer, supplier, contractor, veterinarian, engineer, inspector, agricultural specialist, utility, landlord, transportation provider, or other qualified provider.
- Payment to an insurer, lender, government entity, payroll or benefit administrator, or other institution when the payment satisfies a specifically approved obligation.
- Payment to a qualifying agricultural operation's business account when direct provider payment is impractical or the operation must administer several approved costs, provided permitted uses, records, conditions, and accounting treatment are stated.
- Payment in the legal name or documented trade name of a sole proprietorship only when the file establishes the business purpose and advisers confirm the proper recipient and documentation. This is not unrestricted personal cash assistance.
- Reimbursement of a verified eligible expense incurred before payment only when the final policy permits it, the expense was reasonable and necessary, and the operation did not rely on an unauthorized promise of reimbursement.

Before money is released, the payment file should contain:

[ ] The agricultural approval, financial approval, approved amount or limit, assistance method, authority reference, and available-funds confirmation.

[ ] The recipient's identity, contract or estimate, tax and qualification records when required, conflict review, and independently verified payment instructions.

[ ] A plain-language funding summary or signed agreement stating the approved work, total cost, applicant contribution, Trust contribution, permitted use, conditions, monitoring, reimbursement, and whether any amount is recoverable.

[ ] The required invoice, deposit terms, milestone evidence, change-order approval, completion evidence, and accounting category.

The financial fiduciary or authorized alternate releases payment after confirming both approvals and the payment requirements. The case needs two professional approvals, but the bank does not need two physical signatures on every transaction when the governing documents allow one authorized signer to carry out the documented decision.

New or changed ACH, wire, or other electronic instructions must be verified through an independent method before payment. Cash payments should not be used except under a narrowly approved emergency procedure with receipts, reconciliation, and a stated limit.

Completion, Reimbursements, and Recoverable Assistance

Payment does not close the case. The agricultural reviewer confirms that the work was completed and produced the intended result. The financial reviewer reconciles the invoices, contributions, Trust payments, credits, refunds, unused balances, and expected reimbursements. The closure record should state the result and any continuing obligation.

The operation must disclose later insurance, warranty, government, manufacturer, responsible-party, or other proceeds covering the same cost. The agreement must say how those proceeds will be handled. They may reduce an unpaid Trust commitment, be returned, be applied to an authorized recoverable balance, or be used for another approved part of the recovery. The same cost cannot be paid twice.

Nonrecoverable assistance cannot later be turned into debt. Before accepting recoverable assistance, the recipient must understand the amount, repayment source and schedule, any interest or fees, reporting duties, and consequences of nonpayment. There should be no surprise debt.

Gray-Area Decision Method

A gray area exists when a material fact or judgment is uncertain and reasonable reviewers could disagree. These cases should not be decided by sympathy alone, by a rigid rule that ignores the operation, or by whichever person speaks first.

1. State the uncertainty. Identify the exact fact or judgment that prevents a confident decision. Do not label the entire applicant or case uncertain when one issue can be isolated.

2. Protect against immediate loss. If delay creates a serious safety, animal-welfare, spoilage, access, or irreversible operating risk, consider a narrowly authorized protective action that does not imply approval of the full request.

3. Get only the facts needed. Use the smallest additional review, estimate, trusted-advisor confirmation, site visit, or specialist opinion likely to resolve the issue.

4. Choose the narrowest sound response. Have both reviewers consider partial, staged, temporary, conditional, shared-cost, or referred assistance instead of treating full approval and final denial as the only choices.

5. Record the reasoning. State the agricultural and financial reasons, conditions, review date, and what new information could change the result. If the same issue keeps returning, turn the experience into approved written guidance.

Recurring Gray Areas and How to Handle Them

Financial capacity and contribution

The operation can pay but would rather not. The cost remains the operator's responsibility when business cash or ordinary credit can cover it without impairing essential operations. Reduced profit, normal interest, or a smaller preferred cash cushion is not enough. Explain the expected effect on the business instead of simply stating that money exists.

A receivable or job payment is expected soon. First check whether ordinary short-term financing is timely and affordable. If so, its cost is ordinarily a business expense. If lender timing, collateral, or cost would threaten operations and the incoming payment is reliable, an authorized interest-free or below-market bridge may be considered. Repayment terms must be written before payment, and direct provider payment should be used when practical.

Asset-rich but temporarily cash-limited. Land, essential equipment, breeding livestock, and other productive assets are not the same as cash. Review liquidity, ordinary credit, near-term revenue, and operating needs. Do not require a forced sale to meet a short-term need, but do not overlook cash or financing that is genuinely available.

The operation can pay part. Use shared-cost assistance instead of an all-or-nothing decision. Protect essential operating needs, calculate what the operator can contribute, state when it is due, and explain how cost changes affect both shares. A standard percentage may guide the review but cannot replace an actual ability-to-pay finding.

The applicant has informal records. Work with the records that exist and use confirmation from a trusted advisor, purchaser, lender, supplier, or bank when appropriate. Ask for more only when the decision cannot be made responsibly without it. Informal records are not fraud, but refusing to verify an important fact may prevent approval.

Problem, cause, and solution

A repair reveals a larger problem. Pause the original plan. Protect people, animals, property, and essential operations when needed, then reassess the cause, full solution, cost, and chance of recovery. Additional funding requires a new joint decision. Limited stabilization may still be approved even if the larger project is not.

Deferred maintenance contributed to the failure. Deferred maintenance does not automatically disqualify a case. Determine why it occurred, whether the proposed work will solve the problem, whether the operator should contribute more, and what maintenance or reporting condition is reasonable. Chronic disregard, repeated avoidable failure, or refusal to correct the cause may justify reduced assistance or denial.

The operation is underinsured. Underinsurance is not an automatic denial, especially when coverage was unavailable, misunderstood, or became inadequate as conditions changed. Review why the gap exists and whether future coverage or risk planning should be a condition. Deliberately avoiding available protection, or repeatedly relying on the Trust, may justify a larger contribution or denial.

Repair versus replacement. Compare safety, remaining useful life, total cost, downtime, parts availability, operating reliability, warranties, and the effect of repeated failure. The lowest initial price is not automatically the sound solution, but the Trust should not fund unnecessary capacity, luxury features, or an upgrade unrelated to the approved need. Any betterment should be identified and allocated.

A temporary workaround is available. Determine whether it is safe, lawful, reliable, and less harmful than immediate permanent work. A rental, alternate provider, temporary facility, or staged repair may preserve operations while resources are coordinated. A workaround should not be required when it creates unreasonable safety, animal-welfare, production, or cost risks.

Program classification and outside resources

The case fits more than one Program. Use the Program that best describes the main problem and keep linked work in the same case file. Essential Operations may address an immediate repair while Resource and Gap coordinates insurance or manufacturer recovery. The same cost cannot be awarded twice.

Insurance or government assistance exists but is delayed. Confirm likely eligibility, amount, timing, conditions, and what waiting would do to the operation. A bridge, partial payment, or direct stabilization may be used when the delay creates a real gap. The agreement must address later proceeds and protect the obligation of the insurer or government program.

No outside program appears suitable. Resource and Gap Assistance does not require pointless applications. Record the resources reasonably considered and why none fits. Sole-source Trust assistance may then be considered if the agricultural need, viability, financial gap, authority, and funding requirements are satisfied.

The expense was incurred before approval. There is no automatic reimbursement. Consider whether the action prevented greater loss, whether waiting for approval was impractical, whether the cost and provider were reasonable, and whether policy allows reimbursement. An unauthorized promise does not bind the Trust.

A related agricultural business applies. Verify that the business is independent, within the approved standards, and materially and directly supports agricultural production or qualifying producers. A general business that happens to have agricultural customers should not receive agricultural assistance without a direct and substantial agricultural connection.

An asset or expense is mixed business and personal. Identify the agricultural portion and the reason the whole asset may or may not be necessary. Pay only the approved business share unless counsel and the CPA approve another allocation. A sole proprietorship does not turn a business expense into personal aid, but the file must make the business purpose clear.

Administration, fairness, and changing conditions

Several worthy cases compete for limited funds. First-come order should not control by itself. Give weight to immediate safety and animal welfare, irreversible loss, seasonal timing, workforce effects, available alternatives, likelihood of success, amount needed, prior assistance, and fairness across similar cases. Record why one case received priority and follow up with any case that was deferred.

The applicant has received help before. Prior assistance is a factor, not an automatic bar. Ask whether the new event is separate, earlier conditions were followed, the same cause remains, and another award would be fair and effective. Repeated preventable needs may require corrective conditions, a larger applicant contribution, or denial.

A related-party or familiar vendor is proposed. Disclose the relationship, remove the interested person from the decision, and verify price and qualifications independently. A qualified local or family-connected provider is not automatically prohibited, but familiarity does not replace conflict controls.

A provider requests a change order or the cost increases. If practical, stop before the extra cost is incurred. Decide whether the change is needed to complete the approved work, results from an unforeseen condition, or adds elective work. Additional Trust money requires revised agricultural and financial approval.

Immediate protective action is needed before full review. Use only the emergency authority, payee, spending cap, and record approved in advance. Limit the action to preventing greater loss or protecting people, animals, access, or essential property. Complete the full review promptly; the protective payment does not promise further assistance.

Temporary payroll or benefit support is requested. Confirm the disruption, existing workforce, normal payroll and benefits, employees needed for recovery, other resources, duration, and end date. Pay through the employer or administrator, not as unrestricted cash to workers. Bonuses, expansion hires, owner distributions, and indefinite wage replacement do not qualify.

Expected repayment cannot be made. Find out why repayment failed and reassess cash flow, viability, the underlying problem, and available options. An authorized extension or other modification may be appropriate after professional review. Do not automatically add funding, create a new debt, or treat an honest change in circumstances as misuse.

Information was inaccurate or funds were misused. Distinguish an honest mistake from material misrepresentation or intentional diversion. Correct the record and adjust future payments when possible. Serious or intentional misconduct may require suspension, termination, recovery, disqualification, or reporting; involve counsel when appropriate.

Case Process from Inquiry Through Closure

1. Inquiry and referral

Record who is asking, the operation and location, the general problem, urgency, immediate safety or animal-welfare concerns, and the preferred way to communicate. An inquiry is not a promise of assistance.

2. Preliminary screen and routing

Confirm apparent eligibility, service area, enough information to evaluate, and the likely primary Program. Route an immediate protective need through the approved emergency procedure.

3. Agricultural evaluation

Identify the real problem, cause, operating effect, urgency, practical choices, sound solution, specialist needs, cost, and completion standard.

4. Financial and resource review

Determine what the operation can contribute, which outside resources or ordinary financing are available, what reserve must be protected, and whether a material gap remains.

5. Joint recommendation

Put the proposed solution in one record: Program, eligible work, total cost, applicant share, Trust limit, assistance form, payee, conditions, timing, monitoring, completion, and any repayment or reimbursement.

6. Agricultural and financial approvals

The agricultural reviewer approves the need and solution. The financial reviewer confirms the gap, assistance form, authority, available funds, payee, and payment controls. A recommendation alone does not commit the Trust.

7. Agreement and payment

Provide clear terms, obtain the required signatures and records, verify payment instructions, and release funds under the approved contract, invoice, milestone, or emergency procedure.

8. Monitoring and change control

Track the work, payments, applicant contribution, outside proceeds, conditions, change orders, and any repayment problem. A material change requires reapproval.

9. Completion and closure

Confirm the operating result, reconcile the money, address refunds and recoveries, record any continuing obligation, and close the case with a short outcome statement.

Decision Outcomes, Explanation, and Reconsideration

Every evaluated matter should end in a stated status:

- Approved - the complete requested assistance is approved under written terms.

- Partially approved - only the eligible scope, amount, phase, or assistance form is approved.
- Conditionally approved - approval becomes effective only when stated conditions are satisfied.
- Referred - another resource is the appropriate first or complete solution.
- Deferred - a fact, event, resource decision, funding condition, or appropriate time must occur before a responsible decision can be made.
- Declined - one or more required gates are not satisfied, the cost is ordinary and affordable, the solution is unsound, or another stated reason prevents assistance.
- Incomplete or withdrawn - the operation did not complete the review or chose not to proceed.
- Suspended or terminated - a material change, misuse, conflict, unsafe condition, or failure of an approval condition prevents continued payment or work.

Give the operation a respectful, plain-language explanation of the decision, the main reasons, any conditions or referral, and whether new information or changed circumstances may be reconsidered. A declination should not imply wrongdoing when the actual reason is simply that no material financial gap exists.

Reconsideration may be requested for a factual error, important new information, changed conditions, or inconsistent application of policy. It is not a way to repeat the same request without new grounds. When practical, someone who was not the sole author of the disputed finding should take part in the review, while both required professional functions remain involved.

Consistency, Oversight, and Policy Improvement

Keep a short decision summary for each case and periodically compare similar cases. The purpose is to find unexplained differences, not to make earlier decisions binding. Different sectors, seasons, locations, operating scales, and available resources may justify different results when the reasons are recorded.

Operating fiduciaries should report material exceptions, recurring gray areas, repayment problems, suspected misuse, related-party matters, and significant effects on program reserves through the oversight process. A Trust Director or Trust Protector may address exceptional disputes within the authority granted to that office but should not become a routine case or payment approver.

At scheduled intervals, the agricultural and financial managers should recommend changes based on actual cases, provider performance, resource delays, documentation burdens, recoveries, and results. Each change must be approved, dated, and communicated before it is used.

Items That Must Be Completed Before Program Activation

This framework provides direction but is not ready for case use until the following are approved and attached or incorporated into the final Program Manual:

[ ] Final qualifying-operation, independence, ownership, size, service-area, tenant, related-business, and mixed-use standards.

[ ] Ordinary and exception authority limits, emergency protective-payment cap, Program reserve floor, and commitment-reporting thresholds.

[ ] Documentation-level triggers, financial-review forms, supportable-operating-reserve method, applicant-contribution method, and trusted-advisor confirmation procedure.

[ ] Activated assistance methods and legally reviewed agreements for nonrecoverable, conditional, shared-cost, payroll and benefit, reimbursement, and recoverable assistance.

[ ] Program routing guide, three program-specific evaluation forms, specialist and provider standards, estimate and change-order rules, and completion-verification requirements.

[ ] Payment recipient, onboarding, bank verification, approval, electronic payment, emergency purchase, reimbursement, refund, recovery, reconciliation, and case-closure procedures.

[ ] Declination, explanation, reconsideration, disagreement, related-party, misuse, suspension, repayment-difficulty, and exceptional-dispute procedures.

[ ] Approved fiduciaries and alternates, authority schedule, bank signers, records access, privacy, continuity, risk treatment, and completed simulated-case tests.

[ ] A signed Program Activation action identifying the approved policy version, activated Programs, initial geographic area, available program capital, effective date, and any temporary operating limits.

Development Review Record

Agricultural development review completed by: ________________________ Date: _________

Financial and administrative review completed by: _____________________ Date: _________

Oklahoma counsel review completed by: ______________________________ Date: _________

CPA / tax / accounting review completed by: __________________________ Date: _________

Banking or risk review, if requested: ______________________________ Date: _________

Unresolved issues, required revisions, or attached schedules:

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Initial Trustee review: ____ Date: _________

[ ] Approved for continued development only   [ ] Returned for revision

This review does not activate the Programs or authorize acceptance of a case.