



Contempt and Modifying Orders under the Federal Final Rule

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Road Map for Presentation

- A discussion about contempt, the CLV contempt workgroup, modifications, stipulations, and determining ability to pay under the Federal Final Rule.
- Goals:
 - review the Federal Final Rule provisions on contempt and ability to pay,
 - discuss the current CLV contempt workgroup, and
 - discuss modifications as they relate to contempt and "ability to pay", and
 - discuss alternatives to contempt.

Ask Questions any time!



- There is no “right and wrong” in this topic.
- Just information on the Federal Final Rule, things to consider and alternative methods to think about.
- Color cards on tables with pre-written questions! 😊
 - If you ask one of the questions, grab a prize from the middle of the table.
 - Or ask your own question, and get a fabulous prize!

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The Federal Final Rule

Goals of the Federal Final Rule



- Set accurate child support obligations based on the noncustodial parents' ability to pay;
- Increase consistent, on-time payments to families;
- Move nonpaying cases to paying status;
- Increase the number of noncustodial parents supporting their children;

Goals of the Federal Final Rule



- Improve child support collection rates;
- Reduce the accumulation of unpaid and uncollectible child support arrearages; and
- Incorporate technological advances and evidence-based standards that support good customer service and cost-effective management practices.

Quotes from the Federal Final Rule



- Goal is to “increase **reliable child support** for children by setting child support orders based on the Obligor’s earnings, income or other evidence of **ability to pay.**”

Quotes from the Federal Final Rule



- “The rule is intended to improve the accuracy of and compliance with child support orders by requiring state child support agencies to **increase case investigation** efforts and develop a **sufficient evidentiary basis** for child support orders.”

Quotes from the Federal Final Rule



- “Orders set beyond a parent’s ability to pay can contribute to **unintended consequences**, such as unmanageable debt, reduced employment, participation in the underground economy, and increased criminal activities.”

Quotes from the Federal Final Rule



- “It is **counterproductive and not in children’s best interests** to have their parents engage in a cycle of nonpayment, illegal income generation, and incarceration.”
- “Without an evidentiary basis, imputed income is **fictitious income** and does not generally result in orders based on the noncustodial parent’s ability to pay.”



....Contempt case that shaped part of Federal Final Rule

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Contempt-related parts of the Federal Final Rule

- *Turner v. Rogers*, 131 S.Ct. 2507 (2011)
 - U.S. Supreme Court case that shaped much of the Final Rule discussion on contempt.
- Facts:
 - 5 contempt actions in 3 years, and Mr. Turner paid 4 out of the 5 times.
 - Mr. Turner served full 6 month sentence on the 5th civil contempt.

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Contempt-related parts of the Federal Final Rule



- *Turner v. Rogers*, 131 S.Ct. 2507 (2011)
 - Facts: After release, a 6th contempt was started and a very brief court hearing occurred.
 - Court asked Mr. Turner, “anything you want to say?”
 - Mr. Turner stated that he had chemical dependency issues upon release from jail, suffered a back injury, and then he filed for and started receiving SSI/disability benefits.
 - Court held him in contempt, 12 month sentence, purge condition was pay off all arrears, and court put lien on SSI payments.

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Contempt-related parts of the Federal Final Rule



- *Turner v. Rogers* – Supreme Court discussed 2 issues:
 1. **Right to court-appointed counsel?**
 - U.S. Supreme Court identified differing practices across the country
 - Weighing 3 considerations: (1) CP also not represented & no IV-D attorney, (2) ability to pay and thus, ability to afford attorney is required in the case, and (3) due process procedural safeguards must be in place, so the Supreme Court decided that there was not a right to court-appointed counsel.

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Contempt-related parts of the Federal Final Rule



- *Turner v. Rogers* – Supreme Court discussed 2 issues:
 - The Court indicated that they were not addressing the scenario of a public assistance reimbursement-related contempt, where the opposing side (IV-D agency) is represented by counsel.
 - It's possible that may tip the scales in favor of court-appointed counsel. The Court added a reference to *Johnson v. Zerbst*, 58 S.Ct. 1019 (1938), with emphasis.

Contempt-related parts of the Federal Final Rule



- *Turner v. Rogers* – Supreme Court discussed 2 issues:
 - 2. Procedural Due Process Safeguards:**
 - a. notice to the defendant that "ability to pay" is a critical issue in the contempt proceeding;
 - b. the use of a form to elicit relevant financial information;
 - c. an opportunity at the hearing for the defendant to respond to statements and questions about his financial status; and
 - d. an express finding by the court that the defendant has the ability to pay.

Contempt-related parts of the Federal Final Rule



- *Turner v. Rogers* – Supreme Court discussed 2 issues:
 2. **Procedural Due Process Safeguards** – goes to “critical question” of whether the Obligor has the ability to comply with the order.
 - Quoted research indicating that “many obligors who do not have reported quarterly wages have relatively limited resources.”

Contempt-related parts of the Federal Final Rule



- *Turner v. Rogers*, 131 S.Ct. 2507 (2011)
 - “We conclude that where as here the custodial parent is unrepresented by counsel, the State need not provide counsel to the noncustodial parent. But we attach an important caveat, namely, that the State must nonetheless have in place alternative procedures that **assure a fundamentally fair determination** of the critical incarceration-related question, whether the supporting parent is **able to comply** with the support order.



....Back to the Final Rule



Federal Final Rule

§ 303.6 Enforcement of support obligations

- (c) ... (4) Establishing guidelines for the use of civil contempt citations in IV-D cases.
 - The guidelines must include requirements that the IV-D agency: (i) **Screen the case** for information regarding the noncustodial parent's **ability to pay** or otherwise comply with the order; (ii) **Provide the court** with such information regarding the noncustodial parent's ability to pay, or otherwise comply with the order, which may assist the court in making a factual determination regarding the noncustodial parent's ability to pay the purge amount or comply with the purge conditions; and (iii) **Provide clear notice** to the noncustodial parent that his or her ability to pay constitutes the critical question in the civil contempt action...

Federal Final Rule



- **Per the Final Rule, county agencies must:**
 1. Review the Obligor's circumstances for "actual and present" ability to pay.
 2. Provide the court with information regarding the Obligor's ability to pay or otherwise comply with the order.
 3. Provide clear notice that "ability to pay" is critical question in the contempt.

Quotes in the Final Rule



- Contempt is not an effective "discovery tool".
- "In addition, the final rule is intended to reduce the routine use of costly and often ineffective contempt proceedings and increase case investigation and more cost-effective collection efforts."

Quotes in the Final Rule



- Per OCSE, contempt should **NOT be used** when there is no current income information and the Obligor's ability to pay is unknown.
- "States that have reduced their over-reliance on contempt proceedings have found that they increased collections and reduced costs at the same time."

Quotes in the Final Rule



- As it relates to contempt, "the main goal is to increase consistent child support payments for children by **ensuring that low-income parents are not incarcerated unconstitutionally** because they are poor and unable to comply with orders that do not reflect their ability to pay."
 - Federal Office of Child Support Enforcement (OCSE)

On the flip side



- Contempt can be extremely effective and coercive, if the procedural safeguards are in place, the case is appropriate screened first and the Obligor has an ability to pay.
- Also, what about Minnesota law?
 - Minn. Stat. § 588.01 and 518A.71-72
 - Minn. Gen. R. Prac. 309 and 357.03
 - *Hopp v. Hopp*, 279 N.W.2d 170 (Minn. 1968) (discusses requirements of initial contempt order)
 - *Mahady v. Mahady*, 448 N.W.2d 888 (Minn. Ct. App. 1988) (second stage hearing; purge conditions)
 - *Cox v. Slama*, 355 N.W.2d 401, 403 (Minn. 1984) (right to counsel when incarceration is a real possibility)

On the flip side



- **Minn. Stat. § 518A.71** – “A child support or maintenance order constitutes **prima facie evidence** that the obligor has the ability to pay the award. If the obligor disobeys the order, it is prima facie evidence of contempt.”
- **Minn. Stat. § 518A.72** – “An obligor is presumed to be able to work full time. The obligor has the burden of proving inability to work full time.”

On the flip side



- *Hicks v. Feiock*, 485 U.S. 624 (1988), U.S. Supreme Court decided that California's statutory presumption, that an obligor is presumed to remain able to comply with the support order, is OK as long as the Obligor has the ability to "purge" herself/himself of the contempt.
 - Because of the purge conditions, the proceeding was more "civil" than "criminal" and did not violate the Due Process clause in the Constitution by shifting the burden to the Obligor.

But then again...



- The Federal Final Rule (and *Turner v. Rogers*) requires that child support agencies do the following:
 1. Establish procedures for reviewing cases for civil contempt. The Obligor must have the "**actual and present**" **ability to pay** or comply with the support order.
 2. Provide the court with **information** about the Obligor's ability to pay or comply with the order.
 3. Give **clear notice** to the Obligor that "ability to pay" is the critical question in the civil contempt action.



All of this leads to....

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Contempt and the CLV workgroup

CLV Contempt group



- **How it started?**

- DHS-CSD felt that the State of Minnesota was in compliance with the rule, but the final rule started a productive discussion amongst stakeholders on the differences in how counties work on contempt cases.
- As a result, this issue was submitted to CLV. The CLV Executive Committee agreed to form a contempt workgroup. This was assigned to the CLV enforcement group.

CLV Contempt group



- **The CLV submission form included the following:**

- The Child Support Division Policy and Planning Unit has been analyzing the rule and reviewing current policy, PRISM documents and state law. Although CSD has asked the federal Office of Child Support Enforcement to find MN in compliance with the Federal Final Rule, contempt practices vary across the state and there is concern that the contempt practices in all counties do not meet these requirements.
- In addition, this is a great opportunity to thoroughly review contempt practices statewide for compliance and effectiveness.

CLV Contempt group



- **Questions posed to the Contempt CLV workgroup:**
 - When screening cases for contempt, are counties looking for inabilities as well as the ability to pay and comply with the proposed contempt order?
 - Is the NCP provided with clear notice that his/her ability to pay is the crucial question in the contempt action? Do court documents need to be revised?
 - Does the bench generally have the appropriate information, and is the bench using the information to make appropriate factual determinations regarding the NCP's ability to pay?
 - When information is lacking, when if ever, is contempt appropriate?
 - How can modifications be used in conjunction with contempt to right-size orders?

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CLV Contempt group



- A CLV Contempt Final Rule Subcommittee was formed and meetings have been held on May 4, June 22, and September 7, 2018. The next meeting will be on November 2, 2018.
- This group is made up of DHS staff, Assistant County Attorneys and county child support staff.
 - From DHS and 11 counties statewide
 - List of members can be found on DHS-SIR, CLV page, under "CLV group members" Enforcement CLV group (Contempt as the subgroup).

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CLV Contempt group



Goals:

- Ensure that all counties are in compliance with the requirements specified in the final rule.
- Encourage continuity in how individual counties approach contempt.
- Build a comprehensive reference guide for county attorneys and county staff that includes a screening checklist, legal forms, legal citations, etc.

CLV Contempt group



Work done so far:

- Started by narrowing down issues we wanted to address
- Next, working our way through the process – Start to finish
- Completed: A comprehensive screening checklist
 - Legal Requirements to bring contempt
 - Policy and factual considerations in bringing contempt
 - Includes legal citations when appropriate (and possibly PRISM screens, TBD)

CLV Contempt group



Up next:

- Stage One of contempt: Order to Show Cause, Initial pleadings and resulting orders
 - Determine what must be in the forms, orders
 - Draft template forms and orders
- Stage Two of contempt: Vacating/Lifting the Stay and resulting orders
 - Determine what must be in the forms, orders
 - Draft template forms

CLV Contempt group



Additional questions we intend to address:

- Does the Obligee on a NPA case have to request contempt in order to proceed?
- Non-monetary conditions
- Can you designate payments under your contempt to your county only?
- Can you bring contempt on arrears only cases? (Yes)
 - What is required to do so?
- Is an obligor entitled to good time on contempt sentences?

CLV Contempt group



If you have other issues/questions you would like the Contempt CLV to address:

- Contact a member
- See me after the presentation

If you are interested in joining a CLV committee

- Court, Enforcement, Guidelines, Medical
- Contact: Melissa Rossow (Ramsey Co), Julie Erickson (DHS) or Shila Walek Hooper (Isanti Co)

CLV Contempt group



Co-Chairs:

- Bobby Jackson – Hennepin County – Human Services Program Manager

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- Holly Mikeworth – Isanti County-Assistant County Attorney

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Presenter:

- Karen Wangler – Dakota County–Assistant County Attorney

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Factoring in the Federal Final Rule guidance on Ability to Pay and modifications.....

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Ability to Pay and Modifications

Ability to Pay & Contempt



- What does all that mean, as it relates to contempt?
- What guidance does the Federal Final Rule give us on contempt, modifications and ability to pay?
- What factors should we consider before referring a case to contempt?
- Should we try different option(s) before initiating civil contempt?

Federal Final Rule



- **As a reminder...the Federal Final Rule requires the following of county agencies:**
 1. Review the Obligor's circumstances for "actual and present" ability to pay.
 2. Provide the court with information regarding the Obligor's ability to pay or otherwise comply with the order.
 3. Provide clear notice that "ability to pay" is critical question in the contempt.

"Actual and Present" Ability to Pay?



- Final Rule Factors to consider in this question:
 - **Assets**, or lack thereof
 - Vehicles, house/property, savings accounts, retirement, other?
 - **Residence**,
 - multiple addresses in recent years? No current residential address – more than just getting mail somewhere
 - **Educational attainment**,
 - High school diploma or GED?
 - Technical, vocational or community college?
 - Degrees?

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"Actual and Present" Ability to Pay?



- Final Rule Factors to consider in this question:
 - **Employment and earnings history**
 - Limited? Sporadic? Part-time? Seasonal? Temporary?
 - DEED wages show a history of earnings lower than the income in the order?
 - CCPA payments only?
 - Higher income before, but something changed?
 - Willful non-payer VS. Not able to pay/Not able to maintain consistent employment?

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"Actual and Present" Ability to Pay?



- Final Rule Factors to consider in this question:
 - **Job Skills**
 - Technical, vocational or community college?
 - Prior work experience?
 - **Literacy**
 - Limited or no ability to read and/or write?
 - **Age**
 - Depending on the type of jobs, age may, unfairly, reduce their employment options

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"Actual and Present" Ability to Pay?



- Final Rule Factors to consider in this question:
 - **Health**, physical, mental, emotional
 - Self-reported health concerns?
 - Documented medical diagnosis and treatment?
 - Chemical dependency and mental health concerns can be difficult to obtain treatment for.
 - The health concerns may also prevent the individual from gathering documents, following-through and navigating complex legal system.
 - Significant issue nationwide

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“Actual and Present” Ability to Pay?



- Final Rule Factors to consider in this question:
 - **Criminal record**
 - Felony record will limit their ability to obtain employment
 - Multiple other convictions may also limit
 - Many requirements for probation and re-entry, and almost impossible to navigate in addition to employment
 - Employers that will hire felons are limited
 - **Prevailing earnings level in the local community**
 - Depends on the current circumstances and wage levels in their community

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“Actual and Present” Ability to Pay?



- Final Rule Factors to consider in this question:
 - **Local job market and employers willing to hire Obligor**
 - Low “nationwide” unemployment right now: 3.9% in August 2018 compared to 9.6% in August 2009
 - However, the denominator reduced (labor force participation rate dropped, baby boomers?) – shrinking work force instead.
 - Also, differences by demographics (per U.S. Bureau of Labor Statistics):
 - African American unemployment: 6.3%
 - Latino/Hispanic unemployment: 4.7%
 - Asian unemployment: 3.0%
 - Immigration status

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Review of the case



- **Current circumstances of the Obligor?**
 - Employment or income status
 - Payment history
 - Contact with parties
 - Barriers to employment? Look at Final Rule Factors
- **Current order based on?**
 - Employment changed/ended?
 - Never maintained that income amount?
- **What has changed since the order was entered?**
- **Obligee's input**

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Engage with both parties



- Ask them about the current circumstances and lack of payments
- Ask the Obligor about job searching, contact with agencies to assist?
- Possible barriers: health, job skills, employment history, age, criminal history, local job market, applications and responses from employers?
- Is the Obligor involved in the child's life? Are they helping with daycare, buying small items, parenting time?

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Engage with both parties



- Ask Obligee about the Obligor's circumstances, and what their thoughts are about the current amount, payments, enforcement actions, etc.
 - It is important to get their input! Also, better to find out now than at the OSC/contempt hearing.
- Remember – civil contempt should not be used as a discovery tool. The gathering of information should be done first.
 - Maybe a modification is more appropriate than contempt?

Alternative: Stipulation



- If both parties agree to change the amount, even if temporary, the County should strongly consider drafting a Stipulation with the parties.
- When the parties are engaged in their case and have input on the amount of support, they feel more involved and have a better understanding of a complex legal system.

Alternative: Stipulation



- When support is set based on the parties' current circumstances and with their involvement, it is easier for the County to collect and enforce the support.
- Also, the children are more likely to receive timely and consistent payments, which is a good thing!
- Avoids a court hearing and the stress/time involved with filing a motion. Quick and easy.

Alternative: Stipulation



- Consider a **deviation** – even a temporary one and even if public assistance is open!
- If the parties are able to reach an agreement that includes a deviation from the guidelines, that may be in the best interest of the child(ren) to receive consistent and full payments....instead of nothing at all.

Alternative: Stipulation



- Ramsey County has been doing stipulations (and deviations) for many years.
 - Intact families and child with Obligor stips since 2008 (?). All other types since March 2013 (e.g. reduce basic/medical/childcare support, incarcerated stips, paternity/establishment stips).
- STATS:
 - Average of **6** "intact family/child with Obligor" stips per month
 - Average of **7** "all other types" of stips per month
- We have templates and are willing to share!

Alternative: Modification



- Per OCSE, "A successful strategy to encourage compliance and reduce the need for contempt is to provide **frequent review and adjustment**.... Because income often changes significantly over time, it is important to have policies and practices to **easily adjust orders** to reflect changes in income."

Alternative: Modification



- **Promising Practices in other states** (See *"Alternatives to Incarceration"* OCSE, link at end):
 - using automated review and adjustment via electronic systems and technology;
 - targeting newly unemployed noncustodial parents for a streamlined or expedited review;
 - instituting procedures to receive a modification for a temporary period of time; and,
 - developing outreach materials to encourage parents to seek modifications when they have experienced a significant change in circumstances.

Alternative: Modification



- Has there been a change in circumstances?
 - Decrease in income or decrease in ability to pay?
 - Health issues limiting the ability to work?
- If the Obligor's DEED wage history and payment history do not support the current child support amount, then the County should strongly consider initiating a motion to modify.
 - Contact the parties about their situation, and send Financial Statements.

Alternative: Modification



- Set for hearing to allow both parties to attend and discuss the current circumstances.
- If the support is set based on current circumstances and ability to pay, then payments are more likely.
- In addition, if the Obligor still doesn't pay, then the Court is more likely to approve a civil contempt action.

Alternative: Monitor for Income



- No payments and no current employment? Unsure if a modification is appropriate?
 - Continue to monitor case, quarterly, for income or employment?
- Civil contempt maybe isn't the right option now, considering there is no "actual and present ability to pay" as in Federal Final Rule.

Alternative: Motion to Enforce



- Florida's Motion to Enforce – use when case does not meet criteria for contempt/no proof of present ability to pay.
 - No current employment
 - No record of PA, SSI/RSDI, current disability
- Opportunity to obtain testimony from the Obligor regarding ability to pay, job searching, reason for nonpayment.

Alternative: Motion to Enforce



- Florida's Motion to Enforce - Types of relief: job search with reporting, job training, lump sum payments, payments on arrears
- Positive results
 - Collections received on nonpaying cases
 - Parents participating in job search/job training – Community resources identified first
 - Less intimidating for parents

Alternative: "Appear and Disclose" Subpoena



- Per Federal Final Rule: "Resources put into investigations, '**appear and disclose**' procedures, parent interviews, case conferencing, and expanded data sources are generally a more cost-effective use of Federal and State dollars than using contempt hearings in order to discover information."

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Alternative: "Appear and Disclose" Subpoena



- Option??
- "Appear and Disclose" Subpoena, under Minn. Rule of Family Court Procedure 361.06
 - Attendance of witnesses or production of documents
 - Could designate time and place at the courthouse, not for a hearing but for an opportunity to discuss the case
 - Can be signed by the Assistant County Attorney, not the Court
 - Must be personally served
 - County agencies do not have to pay fees or mileage
 - Cannot be "unreasonable or oppressive", R. 361.06, subd. 3

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Alternative: "Appear and Disclose" Subpoena



- Ramsey County – We have found many cases where the “present ability to pay” is unknown and there is no current employment. Contempt may not be the best option.
 - But there is a statutory presumption...
 - But that may not/does not satisfy the new guidance in the Federal Final Rule...
 - Yes, there are some “big” collections on appropriate contempt cases
 - But, many Obligor in contempt are struggling to meet the purge conditions...resources spent calling/tracking/enforcing to collect few payments.

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Alternative: "Appear and Disclose" Subpoena



- Ramsey County – We are going to try a version of Florida’s Motion to Enforce or the “Appear and Disclose” Subpoena.
 - Contact us if you’d like to try too! We’ll have templates and process developed soon.
 - Another thing we are trying....

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Alternative: Partnership with Workforce Center



- Approximately 25 percent of noncustodial parents have a limited ability to pay child support.
- Traditional child support enforcement tools, such as wage withholding, license revocation, and other administrative actions, are typically unsuccessful with this population, and can undermine employment retention.
 - Elaine Sorensen and Helen Oliver, *Policy Reforms are Needed to Increase Child Support from Poor Fathers*, Urban Institute, 2002.

Alternative: Partnership with Workforce Center



- The underlying problem for some parents is that they face multiple employment barriers and cannot find or maintain a job.
- Per OCSE, as of September 2011, there were at least 28 states with at least 38 work-oriented programs for noncustodial parents in which a child support program was involved.

Alternative: Partnership with Workforce Center



- These programs vary in many ways, but the ultimate goal is the same – increase the likelihood that noncustodial parents are working and paying child support.
- Successful workforce programs **reduce the likelihood of civil contempt** and are an appropriate alternative to incarceration.

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Alternative: Partnership with Workforce Center



- Ramsey County new partnership with Workforce Solutions
 - Beginning of case (before setting an order) and
 - Enforcing a case (before a contempt referral; temporarily modifying support to \$0).
 - Designated employment counselor as well as small group within child support program
 - Pilot program starting October 2018
- Carver County Child Support Workforce Services Program – started in 2004. Court-ordered program, as part of contempt action. It works!

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Things to Consider...



- Research shows that most unpaid child support arrears are owed by noncustodial parents with reported incomes below \$10,000 per year.
 - Elaine Sorensen, Lillian Sousa, and Simone Schafer, *Assessing Child Support Arrears in Nine Large States and the Nation*, Urban Institute, 2007.

Things to Consider...



- Incarceration can result in the accumulation of additional child support debt, and has the potential to reduce future earnings, erode a child's relationship with his or her parent, and negatively impact family and community stability.
 - Nancy Thoennes, *Child Support Profile: Massachusetts Incarcerated and Paroled Parents*, Center for Policy Research, 2002.
 - The Pew Charitable Trusts, *Collateral Costs: Incarceration's Effect on Economic Mobility*, 2010. Steve Christian, *Children of Incarcerated Parents*, National Conference of State Legislatures, 2009.

Things to Consider...



- Research conducted by child support agencies and the Department of Health and Human Services shows that setting an **accurate initial order (and modifying when needed!)** improves the chances that child support payments will continue over time.

- Carl Formoso, *Determining the Composition and Collectability of Child Support Arrearages*, Washington Department of Social and Health Services, Division of Child Support, 2003. U.S. Department of Health and Human Services, Office of Inspector General, *The Establishment of Child Support Orders for Low Income Non-custodial Parents*, U.S. Department of Health and Human Services, OEI-05-99-00390, 2000.

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Things to Consider...



- Parents are more likely to stay current on their child support payments if the support obligation is in the range of **15-20 % of earnings**.

- Mark Takayesu, *How Do Child Support Order Amounts Affect Payments and Compliance?*, Orange County Child Support Services, 2011.

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Things to Consider...



- Willful, non-payment **vs.** Cannot pay/unable to pay
- “**Should** we proceed with contempt?”, and not “**Can** we proceed with contempt”?
 - The Mark Ponsolle question

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Things to Consider...



- The Public Attorney is the representative not of an ordinary party to a controversy, but of a sovereignty whose obligation to govern impartially is as compelling as its obligation to govern at all; and, whose interest, therefore, **is not, that it shall win a case, but that justice shall be done.** As such, the Public Attorney is in a peculiar and very definite sense the servant of the law. The Public Attorney may proceed with earnestness and vigor—indeed, the Public Attorney should do so. But, while the Public Attorney **may strike hard blows**, the Public Attorney is **not at liberty to strike foul ones.**
 - Paraphrase of *Berger v. United States*, 55 S.Ct. 629 (1935) by Mark J. Ponsolle

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Links with more info



- Federal Final Rule:
<https://www.acf.hhs.gov/css/resource/final-rule-resources>
- Alternatives to Incarceration:
<https://www.acf.hhs.gov/css/resource/alternatives-to-incarceration>
- Orange County, California report:
http://ywcass.com/sites/default/files/pdf-resource/how_do_child_support_orders_affect_payments_and_compliance.pdf

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Questions?

Thank you!!

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