




**2024 ANNUAL CONFERENCE**  
 Minnesota Family Support & Recovery Council  
 in partnership with Minnesota County Attorney's Association



## Establishment and Modification Legal Actions

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### Agenda

- Establishment of CS legal actions
- Modification of CS legal actions
- Court Hearings

• Description of this Session: "A session discussing establishments and modifications. We will focus on the foundations of pleadings and court hearings in these types of actions. This is intended for newer child support attorneys and child support officers, and those that are looking for a refresher on the basics of establishments and modifications. The discussion will focus on these actions in the expedited process – from receiving the pleading referral, to case preparation, to the court hearing."

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## Establishments

Minnesota Statutes, section 518A.82  
 (renumbered from 256.87, effective 7/1/2024)

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**Legal Basis – Statutory Renumbering**

- If your EST legal action is/was commenced after 7/1/2024, your *pleadings* (complaint/motion) must include a citation to the new statute number.
- Just adding into default order is not sufficient, because the parties do not receive notice...and thus, no due process.
- Initiating a lawsuit against someone is a BIG deal; the legal basis must be correct.
- Example from DCYF – state CS office:

Effective July 1, 2024 Minnesota Statutes sections 256.741 and 256.87 were renumbered. The statute that now governs assignment of rights by public assistance program is Minnesota Statutes section 518A.81 and the statute that now governs cause of action for child support establishments is Minnesota Statutes section 518A.82.

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**Legal Basis for Child Support Establishment Action**

Minn. Stat. § 518A.82 subds. 1, 1a and 5 (formerly 256.87) provide the basis to commence an action for child support.

**Subd. 1 – Actions against parents for assistance furnished**  
(a/k/a “the past PA reimbursement” subdivision)

“A parent of a child is liable for the amount of public assistance . . . furnished to and for the benefit of the child, including any assistance furnished for the benefit of the caretaker of the child, which the parent has had the ability to pay. Ability to pay must be determined according to chapter 518A. The parent’s liability is limited to the two years immediately preceding the commencement of the action. . . .”

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**Legal Basis for Child Support Establishment Action**

**Subd. 1a – Continuing support contributions.**  
(a/k/a “Ongoing monthly support” subdivision)

“In addition to granting the county or state agency a money judgment, the court may, upon a motion or order to show cause, order continuing support contributions by a parent found able to reimburse the county or state agency. The order shall be effective for the period of time during which the recipient receives public assistance from any county or state agency and thereafter. The order shall require support according to chapter 518A...”

Subd. 3 also: “The order for continuing support contributions shall remain in effect following the period after public assistance...is terminated...”

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**Legal Basis for Child Support Establishment Action – cont'd**

**Subd. 5 – Child not receiving assistance.**  
(a/k/a the "NPA child support" subdivision)

"A person or entity having physical custody of a dependent child not receiving public assistance . . . has a cause of action for child support against the child's noncustodial parents. Upon a motion served on the noncustodial parent, the court shall order child support payments, including medical support and child care support, from the noncustodial parent under chapter 518A. A noncustodial parent's liability may include up to the two years immediately preceding the commencement of the action. *This subdivision applies only if the person or entity has physical custody with the consent of a custodial parent or approval of the court.*"

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**When does the County commence establishment proceedings:**

If paternity has been established, an action to establish child support can be commenced in the Expedited Process when:

- Public Assistance Referral** – the public authority may bring an action for reimbursement of public assistance that was placed for the child during the two years preceding the action, as well as for ongoing reimbursement of public assistance that continues to be placed for the child. The reimbursement obligation shall be based upon the obligor's ability to pay (Chapter 518A; Minn. Stat. § 256.87, subd. 1 and 1a).
- Request by Parent** – the public authority or entity who has custody of a child not receiving public assistance may request IV-D services and establishment of child support.

\*\*If no establishment of paternity, counties can choose to start paternity action in Expedited Process or District Court.

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**How is Paternity established?**

Most common ways in which paternity is established :

- Court ordered adjudication;
- Properly signed and filed Recognition of Parentage (Minn. Stat. § 257.75); or
- If the child was born into a legal marriage.

Paternity can also be established through:

- Other state's Voluntary Acknowledgment of Paternity;
- Other state's or country's birth record (as legal as it complies with the laws of that location and is a conclusive determination of paternity); or
- Other basis of parentage (i.e. adoption).

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**How is paternity established? – cont'd**

**1. Court Ordered Adjudication**

- A Paternity Order where the parent / child relationship has been adjudicated (the court has made a formal judgment or decision.
- Need the specifics of the court order (including the state and county where it issued, court file number, and file date of the order).

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**How is paternity established? – cont'd**

**2. Properly signed and filed Recognition of Parentage**

- Minn. Stat. § 257.75 establishes a parent-child relationship, as long as there are no competing presumptions (unless the competing presumption is a husband who executes a joinder).
- It has the same legal effect as a court ordered adjudication of paternity. Unlike an ordered adjudication of paternity, a ROP does not establish custody, parenting time, or support without commencing a legal action in court.
- A MN ROP is entitled to full faith and credit in other jurisdictions.
- If there are other competing presumptions, the ROP creates a presumption only, and a paternity action must be commenced.

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**How is paternity established? – cont'd**

**More on ROPs:**

- Until there is an *order* granting custody, the mother has statutory sole legal and physical custody of the child.
- It must be completely filled out with no errors, signed by both parties before a notary, and filed with Minnesota Dept of Health – State Registrar of Vital Statistics.
- Parties give up the following when they sign a ROP: (1) genetic testing - the alleged father attests to being the "biological father" by signing a ROP; (2) a trial to determine parentage; (3) a paternity hearing to establish custody and parenting time without filing a separate legal action; and (4) a paternity hearing to determine the child's name if there is not an agreement, without filing a separate legal action.

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**Establishment Referral**

Typically, the Child Support Office will draft pleadings for the Assistant County Attorney's review and signature. Pleadings include the following:

- Summons and Complaint;
- Notice of Motion and Motion for Establishment of Child Support;
- Supporting Affidavit;
- Child Support Guidelines Worksheet(s);
- Notice of Department of Employment and Economic Development Information;
- Attachments, including but not limited to: Employment Verification Responses; Financial Statements; Medical documentation; Child Care Verifications; and
- Confidential Information Form (required by Minn. Gen. R. Prac. 11)

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**Establishment Referral**

**Summons and Motion Requirements:**

- The summons may or may not have a hearing date. If there is no hearing date, and the parties do not request a hearing, the motion may proceed by default without a hearing. Minn. R. Gen. Prac. 363.02.
- The motion shall include the *specific* relief the County is seeking, a specific support amount (if no hearing scheduled) and an acknowledgment that the action is not being pursued for any improper purpose. Minn. R. Gen. Prac. Rules 370.02, subd. 3 and 372.01, subd. 2.

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**Establishment Referral**

**Affidavit Requirements:**

- All guideline worksheets and attachments should be referred to within the body of the affidavit;
- Addresses of the parties:
  - check to see if either party is requesting their address be kept confidential;
  - Out of state address – if the either party has an out-of-state address, there must be specific additional language in both the complaint and affidavit about long-arm jurisdiction over that party. Minn. Stat. § 518C.201.
- Names and dates of birth of each child for which support is being requested;
- Statement about how paternity was established;

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**Establishment Referral**

**Affidavit Requirements – cont’d:**

- Monthly household expenses (if financial statements were returned);
- Information about any non-joint child(ren) - (need to include initials and dates of birth) and whether the parent is legally responsible for the non-joint child(ren) or has a child support obligation for the non-joint child(ren);
- Last known employers;
- Gross monthly income – including how the income was calculated and what information was relied on;

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**Establishment Referral**

**Affidavit Requirements – cont’d:**

- Public Assistance programs (MFIP, GA, SSI, MA, Child Care), including amounts if available;
- Number of court-ordered overnights and the applicable Parenting Expense Adjustment – should be described in detail, including the court file number, date of order, and overnights/parenting time schedule;
- Basic Support – if a guideline worksheet is attached, then the specific dollar amount of basic support should be stated;
- Health Care and Dental Coverage Options – must be stated in detail. If it is unknown, the reason it is unknown should be explained, along with a statement detailing what attempts the CSO made to collect this information;

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**Establishment Referral**

**Affidavit Requirements – cont’d:**

- Uninsured/Unreimbursed health-related expenses – each parent’s PICS percentage share should be specifically stated;
- Child care support – the monthly cost of work-related or education-related child care expenses should be stated. If childcare support is requested, verification of the expenses (from the provider or MEC2) must be attached to the affidavit;
- Past Support and reimbursement owed to the public authority – the specific time periods and to whom the support is owed (NPA or PA) should be stated. If the applicant has indicated they are not seeking past support, there needs to be specific information about how the CSO knows this information and/or a signed waiver of past support from the applicant.

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**ESTABLISHMENT**

### Establishment Pleadings

**Specificity**

- Due Process and Notice
- Allows the parties to be prepared, and impacts how they respond (“preparation of their defense”)
- Court Rules require it now (as of 11/22/2023)
- Allows the Court to proceed by default
- Put yourself in their shoes; what if it’s your relative or friend?
- Especially on PAST SUPPORT requests!
- Include the county’s recommendation in motion, affidavit, worksheet(s)...even if it changes at the hearing. That’s OK!

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**ESTABLISHMENT**

### Establishment vs. Motion to Set

- Establishment action:
  - No prior court orders (in any court file) that address child support
  - Typically, a new court file is created
  - Allows a 2-year past support time period (under 518A.82, subd. 1 and 5)
  - If custody action does not plead out child support in the initiating documents and the custody order doesn’t address child support, then an Establishment action is required.

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**ESTABLISHMENT**

### Establishment vs. Motion to Set

- Motion to Set action:
  - Existing court file that pled out/requested child support, in the initiating documents (Look back at the Petition, Complaint, Answer, Counterpetition, etc.)
  - Child support has previously been addressed, but likely reserved, or “will be addressed at a later date or in Ex Pro” and never finalized.
  - **NO** 2-year past support time period because child support has already been addressed (even though there was no amount set). Due Process and retro modification issues if there was a request to go back 2 years.

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**...and Motions to Modify**

- Motion to Modify action:
  - Existing court file that pled out/requested child support, and there is a prior order that set an amount, including \$0.
  - Must meet statutory change in circumstances under Minn. Stat. 518A.39.
  - **NO** 2-year past support time period/NO retroactive modification; effective date only "when there is a pending motion".
  - Childcare modification can go retro, per Minn. Stat. 518A.39, subd. 7.
- More to come on Modifications...

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**Preparing for the Hearing**

- Many Assistant County Attorneys (ACAs) work with the child support office to have a "prep sheet" that is exchanged between the child support office and county attorney's office prior to the hearing;
- Review the complaint, motion and affidavit to ensure your understanding of what the county is requesting and why;
- Ensure service has occurred and is proper;
- Assistant County Attorney and Child Support Officer should communicate prior to the hearing to learn of any updates or changes to the information; and
- Attempt to contact the parties *before the hearing* to see if there are any areas of agreements, updates to their incomes, or financial situations.

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**At the Hearing**

- **Tips for presenting your case:**
  - At the start of the hearing, the ACA should be prepared to inform the Child Support Magistrate of any agreements, and the issues that remain in dispute.
  - ACA may give an opening statement and inform the Child Support Magistrate of witnesses the County intends to call.
  - ACA proceeds with witness testimony – Child Support Officer *and* the parties. Minn. Gen. R. Prac. Rule 364.12. (Opposing counsel ask questions of any witness in all types of legal actions – civil and criminal.)

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**At the Hearing**

- **Tips for presenting your case:**
  - **This is the county's legal action; the county has the burden to prove their case and support their requests.** Minn. Gen. R. Prac. Rule 364.11.
  - The Child Support Magistrate may ask the parties follow-up questions to clarify certain facts or evidence. Minn. Gen. R. Prac. Rule 364.13, and *In re the Custody of B/L, White vs. Loesch*, No. A22-0964, Minn. Ct. App Dec. 26, 2023 (2023 WL 8889700).
  - ACA should be prepared to offer a "closing statement" summarizing the County's position, requests for relief, and to address any legal issues that may have arisen during the hearing.

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**At the Hearing**

*In re the Custody of B/L, White vs. Loesch:*

- "White contends that the CSM erred on the ground that she called him as a witness and then "tendered" him to the county. Specifically, White contends that the CSM violated rule 614(a) of the rules of evidence. That rule expressly authorizes a district court to call a witness: "The court may, on its own motion or at the suggestion of a party, call witnesses ...." Minn. R. Evid. 614(a).
- White nonetheless contends that the CSM erred by assuming the role of an advocate and providing assistance to the county. He cites a comment to rule 614, which states, "The right to call and question witnesses can be abused by the trial court which assumes an advocate's position ...." Minn. R. Evid. 614, 1977 comm. cmt.
- But rule 614 does not apply because the CSM did not call White as a witness. **Rather, White was called by the county.**

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**Modifications**

Minnesota Statutes, section 518A.39, subd. 2

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**When do we modify?**

- **By request of either party**
  - If, upon review, there is a change in circumstances (e.g. change in income, needs, PA, healthcare, childcare, emancipation) that makes current order unreasonable and unfair.
  - If there would be a result opposite of what the requestor would like, we can still file a motion as long as it meets requirements for modifying the order.
- **On our own**
  - Party is incarcerated
  - Party is receiving public assistance such as GA, Social Security, or MFIP
  - There is a change to public assistance such that we would now be requesting a contribution (MA, MFIP, Childcare Assistance)

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**Basis for Modification**  
(§ 518A.39, subd. 2)

**Substantial change in circumstances**  
that makes the current order  
**unreasonable and unfair**

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**Unreasonable and Unfair**  
§ 518A.39, subd. 2(a)

- Changes that presumably make the order unreasonable and unfair:
  - Substantial change in income for either party
  - Substantial change in need for either party
  - Public assistance
  - Extraordinary medical expenses of child
  - Change in need or cost of medical insurance
  - New childcare expenses
  - Emancipation

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**Substantial Change in Circumstances**  
 § 518A.39, subd. 2(b)

- Presumed to exist when:
  - Guidelines indicate a change of at least 20% and \$75
  - Medical support provision not enforceable
  - Ordered medical insurance not available
  - Existing order is a percentage, not a dollar amount
  - Income has decreased by at least 20% by no fault of their own
  - Deviation due to living in another country where they no longer live

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**Reviewing the Pleadings**

- Typically, the Child Support Office will draft the pleadings for your review and signature.
  - Notice of Intervention (if needed)
  - Notice of Motion and Motion to Modify
  - Affidavit in Support of Motion (with supporting documents – DEED, Employment Verifications, financial statements, etc.)

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**Reviewing the Pleadings - Affidavit**

- Confidential address?
- Information from the prior order
  - Income for both parties
  - Parenting time
    - Must be in court order (518A.36, Subd. 1(b))
    - Can do a deviation if there is an agreement
      - This does not change the court ordered parenting time and a change in parenting time cannot be ordered in the Expedited Process
- Non-joint children that either party is “legally responsible for”
  - Initials/DOBs
  - If there is a child support order due, how much, or if there is no order

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**Reviewing the Pleadings – Affidavit**

- Current Income
  - Proof must be attached – DEED, employer verification, tax documents, financial statement, salary survey, etc.
  - Unemployed or underemployed? 518A.32, Subds. 2-3
- Receipt of RSDI
  - Child(ren) receiving derivative benefits?
- Public Assistance
  - We only address receipt of MA (Medical Assistance), Childcare Assistance, or MFIP (Minnesota Family Investment Program) for reimbursement
  - Does the Paying Parent receive General Assistance or Social Security (SSDI or SSI)?

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**Reviewing the Pleadings - Affidavit**

- Health-care coverage
  - Private coverage – need premium costs (individual + family), deductible amount, copays, others already covered
    - Affordable? Comprehensive? Accessible? Special Needs?
    - Can still receive MA, that will just become secondary coverage if there is other insurance provided, we do not request a contribution to MA
  - Public coverage – effective January 1, 2025, “public health care coverage is presumed appropriate”.
- Division of health-related expenses – PICS %
- Childcare expenses
  - Proof must be attached! From the provider or MEC2/Childcare Assistance.
  - Average expenses over the year

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**Reviewing the Pleadings - Affidavit**

- Legal Justification for modification
  - \$75 and 20% change
    - Creates a rebuttable presumption (“really strong case”)
    - Not a requirement in every modification, but if not, need a basis from 518A.39, subd. 2(a). See updates to state policy.
- Justification for everything you are asking for
  - If it goes by default, does the court have the info they need to issue the order you are asking for?
- Does it seem fair/correct?
  - Guidelines worksheet have all of the relevant info?
  - Affidavit match the supporting documentation?

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**Reviewing the Pleadings – Motion**

- Requesting confidential address?
- Make sure the motion matches the affidavit
  - Addressing all three aspects of support? – basic, medical, and childcare
    - Specifically for medical – change in who is providing/contributing, uninsured/unreimbursed splits, etc.
- Effective date
  - “only while motion is pending”

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**Other Considerations**

- NO Retroactive Modification (518A.39, Subd. 2(f))
  - Can only go back to the date of service of the motion
  - In practice, typically the first of the month after service
- Satisfaction of Support (518A.38, Subd. 3) – integrated into the obligated parent’s family with consent of custodial parent and child support not assigned.
- Arrears Management (518A.62)

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**Preparing for the Hearing**

- Some counties put everything on for hearing, some put certain types of cases on for hearing (imputed income, unique facts, etc.), and some request default orders on most (unless a hearing is requested by a party)
- Know what you are asking for and why
- Use a summary/prep sheet for easy reference
- Talk to your child support officer ahead of time
- Talk to parties ahead of time

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**County Requirement for ALL Ex Pro Hearings**

- Minn. Stat 518A.46, subd. 3(b) - For all matters scheduled in the expedited process, whether or not initiated by the public authority, the nonattorney employee of the public authority shall serve on the parties and file with the court:
  1. DEED wage summaries
  2. Statement of the monthly amounts of basic support, medical support, childcare and arrears currently being charged the obligated parent,
  3. Statement of the types and amount of any public assistance, and
  4. Any other information relevant to the determination of support that is known to the public authority.

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**County Requirement for ALL Ex Pro Hearings**

- Filed and served at least 5 days before the hearing.
- Needed for these types of hearings:
  - Motions to Modify – filed by a party
  - Review Hearings
  - Referral Hearings (from District Court)
- County-initiated EST, PAT or MOD hearings....only if the county has new or additional information, AND the county already submitted the required information in their original pleadings.

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**County Requirement for ALL Ex Pro Hearings**

- Many counties use the Case Information Sheet (CIS), via PRISM.
- The CSMs greatly appreciate it if you include the following (and most items are required):
  - All charging obligations: basic, medical and childcare, and the month/year that any charging ended – e.g. childcare.
  - The arrears balance and “as of” date.
  - Information on non-joint children that both parents are legally responsible for.
  - Attach any recent Employment Verifications for both parents (EMLTs)

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**At the Hearing**

- **County's MOD legal action: the county has the burden to prove their case and support their requests.**
  - Minn. Gen. R. Prac. Rule 364.11.
- ACA can call a represented party as a witness, even if their attorney did not call them.
  - Minn. Gen. R. Prac. Rule 364.12: "A party may call an adverse party or any witness for an adverse party, and may ask leading questions, cross-examine, and impeach that adverse party or witness."
- The Child Support Magistrate may ask the parties follow-up questions to clarify certain facts or evidence.
  - Minn. Gen. R. Prac. Rule 364.13, and *In re the Custody of BJL, White vs. Loesch*, No. A22-0964, Minn. Ct. App Dec. 26, 2023 (2023 WL 8889700).

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**Resources**

- PRISM
  - Allows access and information about cases
- DHS-SIR
  - Contact your county's Child Support supervisor or liaison to be added
- MCAA – Child Support Group for ACAs
  - Online forum for your questions
- DHS Online Tools
  - Calculator: <https://childsupportcalculator-beta.dhs.state.mn.us/>
  - PT schedule: <https://mn.gov/dhs/child-support-calendar/>
- MFSRC website
  - Archived conference handouts
  - Statutes keyword index and GIANT caselaw document

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**Questions?**

**Thank You!**

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