

# Proposal to Provide Technical Assistance for the Review of the Alabama Child Support Guidelines

*Submitted to:*  
State of Alabama  
Administrative Office of Courts

*Submitted by:*  
**CPR**   
center for policy research

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(May 29, 2020)

## CONTENTS

Overview and Statement of Understanding .....	3
Proposed Approach.....	3
Task 1: Review Federal and State Requirements .....	4
Task 2: Review Studies of Child-Rearing Expenditures and Update Schedule.....	5
Task 3: Analyze Case File Data and Labor Market Data .....	7
Task 4: Explore Alternative Low-Income Adjustments.....	8
Task 5: Prepare Final Report .....	9
Task 6: On-Site Presentation.....	9
Qualifications and Experience .....	10
Proposed Staff .....	10
Appendix A: Federal Requirements of State Guidelines (45 C.F.R. § 302.56) .....	14
Resume .....	16

## OVERVIEW AND STATEMENT OF UNDERSTANDING

The Center for Policy Research (CPR) is a non-profit organization with 13 years of experience assisting states (including Alabama) with child support guidelines reviews. In fact, CPR developed the existing Alabama child support guidelines schedule from economic data on the cost of raising children in 2007.

CPR's proposes technical assistance that will meet federal and state guidelines review requirements and be useful information to the Advisory Committee on Child-Support Guidelines and Enforcement for their guidelines review and deliberation. Since Alabama last reviewed its guidelines, federal requirements of state guidelines and state guidelines reviews have changed. (For convenience, the federal requirements are included in Appendix A.)

CPR's proposed technical assistance will explain and address new federal requirements of state guidelines; namely, the consideration of the subsistence needs of the obligated parent; providing that the order is based on evidence of ability to pay; providing that if imputation of income is authorized, there is consideration of the specific circumstances of the parent; providing that incarceration is not treated as voluntary unemployment; and addressing the changes to the provision pertaining to the child's health care needs. Further, CPR's technical assistance will essentially meet all of the data requirements imposed in federal regulations (45 C.F.R §302.56(h)) of a state's guidelines review. This includes reviewing the economic data on the cost of raising children, the analysis of case file, and the analysis of labor market data. CPR will use the economic data to prepare an updated schedule(s). The findings from the analysis of case file and labor market data may be useful information to the Committee as they deliberate whether to update the schedule and the self-support reserve and recommend other changes.

It is assumed that the Administrative Office of the Courts (AOC) will fulfill the federal requirement (45 C.F.R §302.56(h)(3)) to provide opportunity for public input including input from low-income parents and representatives of low-income parties and obtain input from the state child support agency. CPR will also share information with the Committee on how other states are fulfilling that federal requirement. In addition, it is assumed that the AOC will publish the guidelines review report (as federally required by 45 C.F.R §302.56(h)). The Committee may develop its own report or rely on CPR's report to fulfill that federal requirement. If the Committee relies on CPR's report, CPR will include the federally required information (*i.e.*, list of Committee members and dates).

The remainder of this proposal describes CPR's proposed approach and qualifications.

## PROPOSED APPROACH

CPR proposed 6 tasks.

- Task 1: Review federal and state requirements of the guidelines and guidelines review;
- Task 2: Review economic data on the cost of raising children and prepare updated schedule(s);
- Task 3: Analyze case file data and labor market data;
- Task 4: Explore alternative low-income adjustments;
- Task 5: Prepare a draft final report; and
- Task 6: Provide an on-site presentation to the Committee.

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## Task 1: Review Federal and State Requirements

### Purpose:

Develop a shared understanding of

- The federal and state requirements; and
- Options for bringing Alabama in compliance.

**Approach:** This task will address all federal requirements of state guidelines and guidelines reviews with particular focus on federal requirements that do not require the analysis of economic data or case file data. (Those requirements are addressed in subsequent tasks.)

CPR will prepare a side-by-side analysis of the federal and state requirements and what provisions of the existing Alabama guidelines fulfill or partially fulfill those requirements and identify whether any refinements or new provisions are necessary to bring Alabama in compliance with federal requirements. For the new requirements that do not consider economic data or case file data, CPR will provide examples of how other states are meeting the requirements and identify the advantages and disadvantages to various approaches. CPR will also explain how some of the provisions link to other federal requirements imposed on the IV-D child support agency and how a particular guidelines provision could ease the agency's application of that requirement.

### Deliverables:

- This will be a written chapter in the final report, and,
- At AOC/Committee discretion, information can be shared with the Committee within six weeks of project start-up in a Powerpoint or white paper. Dr. Venohr can also be available through teleconferencing or videoconferencing to explain and answer questions at this meeting. A benefit of sharing it early is the Committee can begin to address the new federal requirements that do not require economic or case file data.

### Federal Requirements Addressed:

- All of the requirements in 45 C.F.R. 302.56
- Non-data requirements to be examined in detail as part of this task:
  - 45 C.F.R. 302.56(c)(1)(ii) requires state guidelines to provide that the order is based on evidence of ability to pay;
  - 45 C.F.R. 302.56(c)(iii) requires state guidelines to provide that if imputation of income is authorized, the specific circumstances of the parent are considered;
  - 45 C.F.R. 302.56(c) requires state guidelines to provide that incarceration is not treated as voluntary unemployment; and
  - 45 C.F.R. 302.56 makes changes to the provision pertaining to the child's health care needs.

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## Task 2: Review Studies of Child-Rearing Expenditures and Update Schedule

### Purpose:

Develop shared understanding of:

- economic basis of existing schedule;
- The economic studies of child-rearing expenditures that could be used to update the schedule;
- Other assumptions or data that could be changed or updated (*e.g.*, the existing schedule considers 2007 federal and state income tax rates and FICA, 2007 price levels, and an adjustment for Alabama's lower cost of living based on 2004 Census data, and a self-support reserve equivalent to the 2007 federal poverty guidelines for one person); and
- The impact of possible schedule changes.

**Approach:** First, CPR will develop a succinct table identifying the assumptions and data underlying the current schedule, the data available for updating the data, alternative assumptions and data, and what data and assumptions are typically used by other states. This table can be used by the Committee to direct CPR to develop an alternative schedule based on an alternative assumption or data. (CPR will develop one alternative schedule.)

At the core of CPR's assistance, however, CPR will prepare an updated schedule using the same assumptions of the existing schedule but only with updated data:

- updated Betson-Rothbarth study of child-rearing expenditures since the existing schedule is based on an old Betson-Rothbarth study;
- 2020 federal and state income tax rates;
- 2020 price levels;
- the 2020 federal poverty guidelines for one person as the basis of the self-support reserve; and
- An adjustment for Alabama's lower cost of living using a newly available measure developed by the U.S. Bureau of Economic Analysis (BEA) that finds that Alabama's cost of living is 86.7 percent of the national average.<sup>1</sup> (The use of new BEA measure clearly improves on data and method used to adjust for Alabama's cost of living when developing the existing schedule in 2007.)

Prior to preparing the updated schedule, CPR will prepare a summary of the following current and credible studies of child-rearing expenditures. Different studies are considered because there is no consensus among economists on which methodology best measures actual child-rearing expenditures. To this end, a report commissioned by the U.S. Department of Health and Human Services<sup>2</sup> recommends that any guidelines amount between the lowest and the highest of the credible measurements of child-

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<sup>1</sup> U.S. Bureau of Economic Analysis. (2019). *2017 Regional Price Parities by State (US = 100)*. Retrieved from <https://www.bea.gov/news/2019/real-personal-income-states-and-metropolitan-areas-2017>.

<sup>2</sup> Lewin/ICF. (1990). *Estimates of Expenditures on Children and Child Support Guidelines*. Report to U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. Fairfax, VA.

rearing expenditures is an appropriate guidelines amounts. Many states are examining four studies. The USDA study generally yields the highest amount and the Comanor study yield the lowest amount.

- **Betson-Rothbarth (2020)**<sup>3</sup> that is based on 2014-2019 Consumer Expenditure Survey (CES) data. Betson, a University of Notre Dame professor, is the economist developing the measurements and “Rothbarth” is the methodology used to separate child-rearing expenditures from total family expenditures. Betson-Rothbarth measurements form the basis of 29 state child support guidelines including the current Alabama schedule. This will be the fifth and most current Betson study. The existing Alabama schedule is based on the second Betson-Rothbarth study which is based on 1996-99 CES data.
- **Rodgers-Rothbarth (2018)**<sup>4</sup> that is based on CES 2000-2015. William R. Rodgers is a Rutgers University professor. This is his most current study. It is not used by any state, but an earlier version of this study is used by New Jersey as the basis of its guidelines. Rodgers has a slightly different interpretation of Rothbarth that produces results that differ from Betson’s interpretation.
- **USDA (2017)**<sup>5</sup> that is based on the CES 2011-2015 and is the most current USDA study. Only Minnesota uses USDA measurements as the basis of their guidelines. The USDA has developed a methodology to measure child-rearing expenditures and has produced several updates of it over the past three decades.
- **Comanor et al. (2015)**<sup>6</sup> that is based on the CES 2004-2009 and uses a methodology developed by Professor William Comanor at University of California at Santa Barbara.

Using charts and tables, CPR will compare these studies to the existing Alabama schedule amounts. CPR will also compare the existing Alabama schedule amounts to an updated schedule and the guidelines of bordering states.

#### **Deliverables:**

- The analysis will be a written chapter in the final report;
- The assumptions, data, and steps taken to develop an updated schedule will be documented in the final report:
- Updated schedule(s) in Excel or Word form or both;

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<sup>3</sup> David M. Betson (forthcoming). “Appendix A: Parental Expenditures on Children,” in Center for Policy Research. *Review of the Arizona Child Support Guidelines*.

<sup>4</sup> Rodgers, William M. (2018). “Comparative Economic Analysis of Current Economic Research on Child-Rearing Expenditures.” In Judicial Council of California, *Review of Statewide Uniform Child Support Guideline 2017*. San Francisco, CA. Retrieved from <http://www.courts.ca.gov/documents/lr-2018-JC-review-of-statewide-CS-guideline-2017-Fam-4054a.pdf>.

<sup>5</sup> Lino, Mark. (2017). *Expenditures on Children by Families: 2015 Annual Report*. U.S. Department of Agriculture, Center for Nutrition and Policy Promotion. Miscellaneous Publication No. 1528-2015, Washington, D.C. Retrieved from <http://www.cnpp.usda.gov/publications/crc/crc2012.pdf>.

<sup>6</sup> Comanor, William, Sarro, Mark, and Rogers, Mark. (2015). “The Monetary Cost of Raising Children.” In (ed.) *Economic and Legal Issues in Competition, Intellectual Property, Bankruptcy, and the Cost of Raising Children* (Research in Law and Economics), Vol. 27). Emerald Group Publishing Limited, pp. 209–51.

- Graphical and tabular comparisons of the existing schedule and updated schedule and comparisons with bordering states will be included in the final report; and,
- At AOC/Committee discretion, information about the data and assumptions underlying the existing schedule and options for updating the schedule can be shared with the Committee within six weeks of project start-up in Powerpoint or white paper. Dr. Venohr can also be available through teleconferencing or videoconferencing to explain and answer questions at this meeting. A benefit of sharing it early is the Committee address whether they would like to examine an alternative updated schedule and what alternative assumptions or data they would like to consider.

#### **Federal Requirements Addressed:**

- 45 C.F.R. 302.56(h)(1) which requires the analysis of economic data on cost of raising children; and,
- 45 C.F.R. 302.56(h)(1) which requires the analysis of impact of guidelines policies and amounts on parties with incomes less than 200 percent of the poverty level.

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#### **Task 3: Analyze Case File Data and Labor Market Data**

**Purpose:** This task fulfills federal requirements. Moreover, most states find it very helpful information when deliberating recommended changes to the guidelines. The information uses actual case file data to create a profile of payers and non-payers and labor market conditions that helps inform changes to the low-income adjustment, the minimum order, and income imputation policies.

**Approach:** Most states contracting with CPR for this task extract the data from the state's automated child support system. After a preliminary discussion with a representative of the state's child support agency, CPR supplies the state with a data wishlist and case selection criteria based on what is typically available from other states and Alabama-specific modifications. In turn, the list is reviewed by information technology staff that work with the automated system. If they have any questions, they contact CPR. Once CPR receives the extract, it typically takes CPR one to three months to analyze the data depending on the timing of the receipt of the data and availability of staff. CPR has developed several proxies to meet the federal requirement for states that do not record income imputation, default, and whether the low-income adjustment was applied. For example, CPR uses the guidelines amount for minimum-wage earners as a proxy for orders imputed at minimum wage. In turn, CPR compares payment amounts for those with orders set at this amount with payment amounts for orders set slightly less and slightly more. CPR typically finds that payment is less for those with the minimum-wage order. This finding (if it occurs in Alabama) underscores the need for the guidelines to better address income imputation, which is also a federal requirement.

CPR gathers labor market data from a state's department of labor and supplements it with national data when appropriate. Due to major changes in employment resulting from the COVID-19 pandemic, CPR has also been gathering data from other credible sources (*e.g.*, Federal Reserve banks) since there is a lag in collecting data and reporting the information and the COVID-19 economic changes happened

quickly. The analysis of the labor market data has been informative to developing income imputation policies around hours worked (*e.g.*, using 37 hours per week instead of 40 hours because state evidence finds service-sector jobs offer fewer hours per week) and understanding what low-skilled, jobs typically pay in the state, which is also informative to income imputation policies.

**Deliverables:**

- This will be a written chapter in the final report, and,
- Some of the findings will be intertwined with other topics (*e.g.*, updating the self-support reserve) when appropriate.

**Federal Requirements Addressed:**

- 45 C.F.R. 302.56 (h) which requires the analysis of labor market data and case file data on guidelines applications, deviations, default, income imputation, use of the low-income adjustment, payment patterns, and other data.

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**Task 4: Explore Alternative Low-Income Adjustments**

**Purpose:** This task explores numerous alternatives. The existing low-income adjustment consists of the self-support reserve and the minimum order. It is largely determined by policy decisions. There are many besides the amount of the self-support reserve and amount of the minimum order and whether to even have a minimum order. Many states provide self-support reserves that are more than the federal poverty guidelines for one person. Some states are eliminating a minimum order or providing for circumstances when there should be zero. Further, the self-support reserve adjustment can be applied to each parent or just the noncustodial parent, applied before or after other adjustments (*e.g.*, an adjustment for extraordinary medical expenses), and there are many options for phase-out of the adjustment and phase-in of the economic data in the schedule.

**Approach:** CPR will identify the numerous sub-factors that are considered in the low-income adjustment (as described above), list options, and identify the advantages and disadvantages of the options. CPR will also examine how other states approach each of these options. CPR will also use the findings from the analysis of case file data, particularly the analysis of payment data by income or order amount to inform the Committee of the likely impact of any changes to the low-income adjustment. In addition, CPR will prepare graphical and tabular comparisons illustrating the differences in order amounts based on these alternatives.

**Deliverables:**

- This will be a written chapter in the final report, and,
- Can be addressed at the final presentation. (It is better to complete this task after analyzing the case file data since the findings from the analysis is typically informative to improving the low-income adjustment).



### **Federal Requirements Addressed:**

- 45 C.F.R. 302.56 (c)(1)(2) requires state guidelines to consider the basic subsistence needs of the noncustodial parent (and at the State's discretion, the custodial parent and children) who has a limited ability to pay by incorporating a low-income adjustment, such as a self- support reserve or some other method determined by the State;

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### **Task 5: Prepare Final Report**

**Purpose:** This purpose of the final report will be to document the review and the assumptions, data, and steps used to develop an updated schedule if the Committee recommends an updated schedule.

**Approach:** The report will be an accumulation of the materials and information developed in the previous tasks.

### **Deliverables:**

- A draft report will be prepared 2 months after receipt of the case file data for Task 3.
- It will be presented to the Committee as part of Task 6 and finalized after Task 6.

### **Federal Requirements Addressed:**

- 45 C.F.R. 302.56(e) requires publication of the guidelines review members and guidelines dates. The report will include this information.

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### **Task 6: On-Site Presentation**

**Purpose:** This will allow the committee to develop a shared understanding of the findings from the review and ask questions.

**Approach:** The on-site presentation can occur at the end of the project or at the meeting following the start of the contract. The advantage of having the meeting at the beginning is to gain a shared understanding of the information to be developed in Tasks 1 and 2. Specifically, this will allow the Committee to work on the non-data federal requirements early and to have input at the beginning of the project on the development of the updated schedule as well as ask clarifying questions about the new federal requirements.

**Deliverables:** Powerpoint slides of key points.

### **Federal Requirements Addressed:**

- All requirements in 45 C.F.R. 302.56

## QUALIFICATIONS AND EXPERIENCE

The Center for Policy Research (CPR) is a non-profit organization established in 1981 to provide independent evaluation and technical assistance to federal, state, and local government agencies and courts on children and family issues. CPR has contracted with over 30 states on projects for the review and development of child support guidelines since 2007. This included a contract to assist Alabama with its 2007-08 guidelines review. It also includes contracts with Arkansas, Arizona, California, Connecticut, Colorado, Guam Georgia, Illinois, Indiana, Iowa, Kentucky, Louisiana, Maryland, Minnesota, Missouri, Nebraska, New Mexico, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, Virginia, West Virginia, Wyoming and the Eastern Shoshone Tribe.

For most of these states, CPR has provided written summaries of economic studies on the cost of raising children and used that data to develop updated child support schedules that also consider the economic situation of a particular state such as whether the state's cost of living is more or less than the national average as well as the state income tax rate of that particular state because taxes affect the amount of spendable income available for child-rearing expenditures. CPR has also updated schedules for changes in price levels. In addition, CPR has developed guidelines adjustments for low-income parents with limited ability to pay and formulas for parties with very high income, additional dependents, and shared-parenting time.

Most recently, CPR has assisted or is assisting several states with fulfilling new federal requirements of state guidelines (45 C.F.R. 302.56) that become effective December 2016. States have a year after commencing their next review that occurred a year after the rule became effective to meet the deadline. This includes analysis of case file data to determine rates of income imputation, default orders, and use of the state's low-income adjustment, analysis of payment patterns by various characteristics, examination of labor market data, and other analyses. CPR has developed various proxies for these measures using IV-D automated system data even for states that do not have specific data fields for the requisite federal data. CPR conducted or is conducting the analysis required under the new federal regulation for Arizona, Georgia, Guam, Kentucky, Missouri, New Mexico, Nebraska, Oklahoma, and Pennsylvania.

The table on the next page lists current projects or projects completed by CPR in the last two years. The list is organized alphabetically by state. It also contains project year and notes whether the project was through the state child support agency or the court—many states set their guidelines in legislation.

## PROPOSED STAFF

CPR Economist/research associate, Dr. Jane Venohr, will lead the project. Dr. Venohr has a Ph.D. in economics from the University of Colorado. She assisted Alabama with its last guidelines review. Dr. Venohr has 30 years of experience with the review and development of state child support guidelines. She has directed all of CPR's child support guidelines projects. Venohr has published articles in the *Family Law Quarterly* and the *Journal of the American Academy of Matrimonial Lawyers*. Venohr also periodically teaches economics and business statistics for Colorado Mountain College. This includes a

business statistics class that is part of a small-business certificate program offered at the Buena Vista Correctional Facility, which is a medium security prison. Venohr's resume is attached.

Venohr will be assisted by CPR's pool of research assistants and associates. This includes CPR Research Assistant, Savannah Matyasic, who has assisted with the guidelines reviews for Guam, Kentucky, and Oklahoma child support guidelines review and has conducted other research assistance on CPR's child support guidelines projects. In addition, CPR associate director, Dr. Nancy Thoennes, will assist Matyasic with the data analyst. Thoennes has led the data analysis for countless CPR projects including the review of child support guidelines.

<b>Arizona Child Support Guidelines Review</b> (current, court). CPR is providing technical assistance.	Susan Pickard Statewide Child Support Initiative Coordinator, Administrative Office of the Courts 602.452.3252 SPickard@courts.az.gov
<b>Arkansas Child Support Guidelines</b> (2019, court).  Arkansas guidelines are set in court rule and Arkansas is switching from a percentage-of-obligor income guidelines to an income shares guidelines.	Brooke F. Steen Staff Attorney   Administrative Office of the Courts: Arkansas Office: 501-682-9400 <a href="mailto:brooke.steen@arcourts.gov">brooke.steen@arcourts.gov</a>
<b>Illinois Child Support Guidelines</b> (2020 and earlier, state agency) CPR has held multiple contracts with Illinois to assist them with the review of their guidelines and switching to the income shares model. CPR's current contract is to provide annual updates to their gross-to-net income conversion table and the Guideline table if warranted.	Bryan Tribble, Policy Director, State Child Support Services, 217.720.0184, <a href="mailto:Bryan.Tribble@Illinois.gov">Bryan.Tribble@Illinois.gov</a>
<b>Georgia Child Support Guidelines</b> (2018, court). CPR used economic data on the cost of raising children to assess whether updates to the Georgia schedule were appropriate. CPR also analyzed case file data collected by court staff to fulfill the federal requirement to analyze case file data on guidelines applications and deviations	Elaine Johnson, Executive Program Manager, Judicial Council's Administrative Office of the Courts of Georgia: 404-463- 6383, <a href="mailto:Elaine.johnson@georgiacourts.gov">Elaine.johnson@georgiacourts.gov</a>
<b>Kentucky Child Support Guidelines</b> (2019, state agency). CPR assisted Kentucky with meeting the federal requirements.	Maria Lewis, Assistant Director, 502.564.2285, Ext 4831, <a href="mailto:Maria.Lewis@KY.gov">Maria.Lewis@KY.gov</a>
<b>Maryland Child Support Guidelines</b> (2020 and earlier, state agency) Over the last four years, CPR has held three contracts with Maryland. These projects, CPR has analyzed economic data and updated the Maryland child support schedule and explored several options for a Maryland self-support reserve. In addition, CPR economist has provided legislative testimony.	Kevin Guistwite, Executive Director, Child Support Enforcement Administration, (410) 767-7606 <a href="mailto:kevin.guistwite@maryland.gov">kevin.guistwite@maryland.gov</a>
<b>Technical Assistance to the Minnesota Child Support Task Force</b> (2019, state agency). CPR provide technical assistance on several issues including the analysis of economic data on the cost of raising children, analysis of case file data, development of a low-income adjustment, analysis of adjustments for non-joint children, analysis of modification thresholds and other issues.	Jessica Raymond, Policy Analyst. Child Support Division/CFS 651-478-8109 <a href="mailto:Jessica.raymond@state.nm.us">Jessica.raymond@state.nm.us</a>
<b>New Mexico Child Support Guidelines Review</b> (2018, state agency) CPR assisted New Mexico with meeting the new federal requirements	Melinda Pineda, Policy Manager, State of New Mexico Child Support Administration 505-827-1320 <a href="mailto:melinda.pineda@state.nm.us">melinda.pineda@state.nm.us</a>

<p><b>Oklahoma Child Support Guidelines</b> (2019). CPR assisted with meeting federal requirements</p>	<p>Elizabeth Wilson, Assistant Director, Child Support Services, 405.522.2780 Elizabeth.Wilson@okdhs.org</p>
<p><b>Pennsylvania Child Support Guidelines</b> (current and earlier, court). CPR has assisted Pennsylvania with its last four reviews. In addition, CPR has helped Pennsylvania update its spousal support formula.</p>	<p>Bruce Ferguson, Counsel for the Domestic Relations Procedural Rules Committee 717-231-9555 ext 4129, bruce.ferguson@pacourts.us</p>
<p><b>Tennessee Child Support Guidelines</b> (2020 and earlier, state agency), , CPR was awarded multiple contracts to assist Tennessee with the review of the guidelines. This included an analysis of economic data and case file data and the development of a low-income adjustment. Tennessee was one of a few states not to have a presumptive low-income adjustment in its guidelines. CPR helped Tennessee draft proposed rules. The Tennessee child support guidelines are set in administrative rules but are subject to a rigorous a review process that involves legislature input</p>	<p>Emily Gregg, Project Manager 615-313-5847 emily.gregg@tn.gov or</p>

## APPENDIX A: FEDERAL REQUIREMENTS OF STATE GUIDELINES (45 C.F.R. § 302.56)

- (a) Within 1 year after completion of the State's next quadrennial review of its child support guidelines, that commences more than 1 year after publication of the final rule, in accordance with § 302.56(e), as a condition of approval of its State plan, the State must establish one set of child support guidelines by law or by judicial or administrative action for setting and modifying child support order amounts within the State that meet the requirements in this section.
- (b) The State must have procedures for making the guidelines available to all persons in the State.
- (c) The child support guidelines established under paragraph (a) of this section must at a minimum:
  - (1) Provide that the child support order is based on the noncustodial parent's earnings, income, and other evidence of ability to pay that:
    - (i) Takes into consideration all earnings and income of the noncustodial parent (and at the State's discretion, the custodial parent);
    - (ii) Takes into consideration the basic subsistence needs of the noncustodial parent (and at the State's discretion, the custodial parent and children) who has a limited ability to pay by incorporating a low-income adjustment, such as a self-support reserve or some other method determined by the State; and
    - (iii) If imputation of income is authorized, takes into consideration the specific circumstances of the noncustodial parent (and at the State's discretion, the custodial parent) to the extent known, including such factors as the noncustodial parent's assets, residence, employment and earnings history, job skills, educational attainment, literacy, age, health, criminal record and other employment barriers, and record of seeking work, as well as the local job market, the availability of employers willing to hire the noncustodial parent, prevailing earnings level in the local community, and other relevant background factors in the case.
  - (2) Address how the parents will provide for the child's health care needs through private or public health care coverage and/or through cash medical support;
  - (3) Provide that incarceration may not be treated as voluntary unemployment in establishing or modifying support orders; and
  - (4) Be based on specific descriptive and numeric criteria and result in a computation of the child support obligation.
- (d) The State must include a copy of the child support guidelines in its State plan.
- (e) The State must review, and revise, if appropriate, the child support guidelines established under paragraph (a) of this section at least once every four years to ensure that their application results in the determination of appropriate child support order amounts. The State shall publish on the internet and make accessible to the public all reports of the guidelines reviewing body, the membership of the reviewing body, the effective date of the guidelines, and the date of the next quadrennial review.
- (h) As part of the review of a State's child support guidelines required under paragraph (e) of this section, a State must:
  - (1) Consider economic data on the cost of raising children, labor market data (such as unemployment rates, employment rates, hours worked, and earnings) by occupation and skill-level for the State and local job markets, the impact of guidelines policies and amounts on custodial and noncustodial parents who have family incomes below 200 percent of the Federal poverty level, and factors that influence employment rates among noncustodial parents and compliance with child support orders;

(2) Analyze case data, gathered through sampling or other methods, on the application of and deviations from the child support guidelines, as well as the rates of default and imputed child support orders and orders determined using the low-income adjustment required under paragraph (c)(1)(ii) of this section. The analysis must also include a comparison of payments on child support orders by case characteristics, including whether the order was entered by default, based on imputed income, or determined using the low-income adjustment required under paragraph (c)(1)(ii). The analysis of the data must be used in the State's review of the child support guidelines to ensure that deviations from the guidelines are limited and guideline amounts are appropriate based on criteria established by the State under paragraph (g); and

(3) Provide a meaningful opportunity for public input, including input from low-income custodial and noncustodial parents and their representatives. The State must also obtain the views and advice of the State child support agency funded under title IV–D of the Act.

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## EDUCATION

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**PhD** Economics  
1997 *University of Colorado, Boulder*

**MS** Economics  
1990 *University of Colorado, Denver*

**BS** Regional Planning  
1982 *Grand Valley State University*

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## CURRENT EMPLOYMENT

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2007 – Present **Economist and Senior Research Associate**  
Center for Policy Research in Denver, Colorado

2012 – Present **Adjunct Faculty, Macroeconomics, Microeconomics and Business Statistics**  
Colorado Mountain College, Glenwood Springs, Colorado

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## PAST EMPLOYMENT AND EXPERIENCE

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1999-2006 **Lecturer: Micro- and Macroeconomics**  
Metropolitan State University in Denver, Colorado

1997-2007 **Economist and Senior Research Associate**  
Policy Studies Inc. (PSI) in Denver, Colorado

1989-1997 **Research Assistant/Research Associate**  
Policy Studies Inc. (PSI) in Denver, Colorado

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## ECONOMIC ADVISOR AND TECHNICAL ASSISTANCE ON CHILD SUPPORT GUIDELINES

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Venohr led the technical assistance for the following state reviews or developments of child support guidelines. Venohr has also assisted six states change their guidelines model to income shares. Venohr assessed and summarized the economic evidence on child-rearing expenditures and used the evidence to develop updated child support schedules or formulae for most of these projects. For some projects, Venohr also provided legislative or committee testimony, analyzed case file data, developed guidelines worksheets or other guidelines provisions to deal with special case circumstances such as low-income adjustments, shared-parenting time, extraordinary healthcare costs, and multiple families. Venohr produced a report for most of these projects.



Commonwealth of Northern Mariana Islands, Guam, Illinois, Kentucky, Maryland, Pennsylvania, Tennessee, Vermont	2019
Colorado, Georgia, Illinois, Maryland, Minnesota, Nebraska, New Mexico, North Carolina, Tennessee, Utah	2018
Eastern Shoshone, Illinois, Kansas, Maryland, Minnesota, New York, Rhode Island, Tennessee, Ohio	2017
Illinois, Iowa, Maryland, Minnesota, Missouri, Nevada, Ohio, Pennsylvania, South Dakota, Wyoming	2016
Arizona, Georgia, New Mexico, North Carolina, Nebraska, Ohio, Vermont	2014
West Virginia, Maryland (low-income)	2013
Arkansas, Connecticut, Illinois, Iowa, Missouri, South Dakota, Tennessee, Texas, Wyoming	2012
Rhode Island, Virginia	2011
New Mexico, Pennsylvania, California, New York, North Carolina, Illinois, Vermont, Georgia	2010
Arizona, Colorado, Illinois, Indiana, Ohio, South Carolina, Tennessee	2009
Illinois, Maryland, Missouri, Pennsylvania, South Dakota, Wyoming	2008
Alabama, Iowa, Louisiana, Maine, New Mexico, Rhode Island, Vermont	2007
Arkansas, Alabama, Nebraska, North Carolina, Oregon	2006
California, Georgia, Maryland, Massachusetts, Minnesota, Tennessee, Washington	2005
Alabama, Connecticut, Guam, Iowa, Maryland, Missouri, Ohio, South Dakota, Washington, West Virginia, Wyoming	2004
Arizona, District of Columbia, Louisiana, New Jersey, Pennsylvania, South Carolina, Tennessee	2003
Georgia, Indiana, North Carolina, New Mexico, Tennessee, Utah, Vermont	2002
Georgia, Michigan, Missouri, Oregon, Rhode Island, Tennessee, Wisconsin	2001
Arkansas, California, Colorado, Kentucky, Maryland, Ohio, South Dakota, Arizona, Connecticut, Iowa, Idaho, Louisiana, Maine, Vermont, Virginia	2000

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## SELECTED RESEARCH, EVALUATION and TECHNICAL ASSISTANCE PROJECTS

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<b>Fatherhood Research and Practice Network (FRPN)</b>   U.S. Department of Health and Human Services, Administration for Children and Families, Office of Planning, Research and Evaluation, Subcontract with Temple University	2013-2018
<b>Evaluation of the Behavioral Interventions for Child Support Services (BICS) Demonstration</b>   U.S. Department of Health and Human Services, subcontract with MDRC	2015-2017
<b>Colorado HCPF: Development of Announcement and Scoring of Grant Proposals for School-Based Substance Abuse Prevention Program</b>   Colorado Department of Health Care Policy and Financing	2014
<b>Exploring a Child Support Pass Through Option for Colorado</b>   Colorado Department of Human Services	2013
<b>Streamlining the Child Support Modification Process:</b> Massachusetts Department of Revenue	2010-2012

<b>Evaluation of the Work Support Strategies Initiative: An Initiative that Coordinates and Streamlines Applications/Recertifications for Medicaid/CHIP, SNAP, TANF and Child Care Assistance</b>   State of Colorado Department of Human Services	2011-2012
<b>Pew Center on the States – Strategic Initiatives in Child Support Enforcement</b>   Pew Charitable Trust	2011
<b>Parents to Work: A Collaboration between Child Support and a Work Force Program</b>   Arapahoe County, Department of Human Services, Child Support Enforcement Division	2008-2011
<b>Technical Assistance Guidance for Effective Customer Service</b>   Department of Health and Human Services, Office of Child Support Enforcement	2008-2009
<b>Grant to Improve Collaboration between Medicaid and the Child Support Program</b>   State of Texas, Office of the Attorney General	2007-2011
<b>North Dakota 1115 Grant to Test the Collaboration between Child Protective Services and the Child Support Program</b>   Sub-contract with Policy Studies Inc.	2007-2011
<b>Investigation of Improved Access to Child Care and Early Education</b>   The Piton Foundation and the Denver Public Schools Preschool Program	2009
<b>Barriers to CCCAP Utilization: Proposed Assessment and Identification of Needed Solutions</b>   Denver Early Childhood Council	2007-2008
<b>Hawaii 1115 Grant to Test the Collaboration between TANF and the Child Support Program</b>   Sub-contract with Policy Studies Inc.	2007-2008
<b>The Motherhood Project, Services for Female Offenders in the Colorado Correctional System</b>   Colorado Department of Labor and Employment	2007
<b>Evaluation of Early Intervention Procedures Used to Collect Child Support</b>   Colorado Department of Human Services, Division of Child Support Enforcement	2006-2009
<b>Child Support Payment Predictor Model</b>   Commonwealth of Virginia, Department of Social Services	2004-2008

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## **Selected Projects while at PSI**

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<b>Task Order 42: Study to Investigate Underlying Causes of the Flattening of Increases to Child Support Collections</b>   Federal Office of Child Support Enforcement	2006
<b>Impact of Modification Thresholds on Review and adjustment of Child support Orders; and Effects of Child support Order Amounts on Payments by Low-Income Parents</b>   Federal Office of Child Support Enforcement	2006
<b>Knox County, Tennessee: Case Stratification Process</b>   Federal Office of Child Support Enforcement	2006

<b>Cost of Providing Center-Based Child Care</b>   State of Minnesota	2006
<b>Final Report: Evaluation of the Louisiana Low-Income Fatherhood Program</b>   SSA Consultants, Inc., Subcontract with SSA Consultants	2004-2005
<b>Evaluation of the Community Literacy Project of Greater Park Hill &amp; Northeast Denver</b>   Summer Scholars	2004
<b>Profile of Low-Income Fathers in Louisiana; Low-Income Fathers and Child Support: Best Practices and Recommendations; and Low-Income Fatherhood Program: Implementation Evaluation and Early Outcomes</b>   State of Louisiana Department of Social Services, Subcontract with SSA Consultants	2003-2004
<b>Grant to Center for Public Policy Studies Child Support Trust Accounts: Guide for Designing A Demonstration Program</b>   Ann E. Casey Foundation	2003-2004
<b>Colorado Partnerships: Workforce, Faith, &amp; Community Works! Initiative</b>   Colorado Department of Labor and Employment	2002-2004
<b>The Role of Minnesota Child Support Enforcement in Increasing Access to Healthcare Coverage for Children in Minnesota</b>   State of Minnesota	2002-2004
<b>Child Support Passthrough in Minnesota: An Evaluation and Outcome Evaluation</b>   State of Minnesota	2002-2003
<b>Task Order 23: Using Automated Income Data to Establish or Modify Child Support Orders</b>   Federal Office of Child Support Enforcement	2002-2003
<b>Task Order 24: State Policies and Practices that Address the Circumstances of Low-Income Noncustodial Fathers</b>   Federal Office of Child Support Enforcement	2002-2003
<b>Utilization of Federal Parent Locator Service Data for Evaluation of the Federal Welfare and Child Support Enforcement Program</b>   U.S. Department of Health and Human Services, Subcontract to Mathematica Policy Research & Social and Scientific Systems	2000-2003
<b>OCSE Responsible Fatherhood Programs: Client Characteristics and Outcomes; OCSE Responsible Fatherhood Programs: Early Implementation Lessons</b>   Federal Department of Health and Human Services, Assistant Secretary of Evaluation and Planning	1999-2003
<b>Evaluation of Father Friendly Initiative</b>   Commonwealth of Massachusetts	1999-2003
<b>Special Improvement Project to Implement Administrative Enforcement in Interstate Cases</b>   State of Wyoming	1999-2002
<b>Colorado E-Commerce Needs Assessment Report</b>   Colorado Department of Human Services	2001-2002
<b>Task Order 12: Assessment &amp; Inventory of State Staffing Patterns</b>   Federal Office of Child Support Enforcement	2001-2002
<b>Task Order 18: National Child Support Research Conference</b>   Federal Office of Child Support Enforcement	2001-2002
<b>Evaluation of Electronic Modification (ELMO) of Child Support Orders</b>   State of Alaska	2001

<b>Telephone Survey of State Paternity Establishment Policies and Practices: Summary of Results</b>   National Institute for Child Health and Development, Subcontract with Cornell University	1999-2003
<b>Exploring Options: Arrears Forgiveness and Passthrough of Payments to Custodial Families</b>   State of Minnesota Legislature	1999-2000
<b>Minnesota Child Support Assurance: Program Design Caseloads and Cost</b>   State of Minnesota	1999-2000
<b>Updated Colorado Staffing Standards for Child Support Enforcement</b>   Federal Office of Child Support Enforcement, State of Colorado	1999-2000
<b>A Study of Interest Usage on Child Support Arrears: State of Colorado</b>   State of Colorado	1999-2000
<b>Comprehensive Study of the Montana Certificate of Need Program</b>   Montana Department of Public Health and Human Services	1999
<b>Massachusetts Paternity Acknowledgment Program</b>   Massachusetts Departments of Health and Public Health	1994-1996
<b>Estimating the Benefits of Collecting Interest on Child Support Arrears: State of Oregon</b>   Oregon Department of Justice	1994
<b>WIC Distribution Payment Options: State of Vermont</b>   Vermont Department of Health	1993-1994
<b>Improving Energy Efficiency in Public Housing: A Colorado Field Experiment</b>   Department of Housing and Urban Development, Grant to Center for Public Policy Studies	1993-1994
<b>Central Payments Analysis: Standards, Current Problems, and Constraints</b>   Minnesota Department of Human Services	1993-1994
<b>Local Mental Health Funding: Other State Methods and Wyoming Policy Options</b>   Wyoming Department of Health	1993-1994
<b>Wyoming Nursing Salary Survey</b>   Wyoming Department of Health	1992
<b>Analysis of Wyoming Community Programs</b>   Wyoming Department of Health	1992
<b>Iowa/Nebraska: The Use of Electronic Funds Transfer Project: Analysis of Implementation Process and Issues in Child Support</b>   State of Nebraska	1990

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## Selected Publications

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Jane Venohr (2017). "A Call to Revisit Promising Practices for Staffing Configurations and Cost-Effective Staffing Levels in Child Support Offices." National Child Support Enforcement Association. *Communique*, Fairfax Virginia.

Jane C. Venohr (2017). "Differences in State Child Support Guidelines Amounts: Guidelines Models, Economic Basis, and Other Issues." *Journal of the American Academy of Matrimonial Lawyers*. Vol. 29, pp 377-407.

Jane C. Venohr (2015) "Income Available for Child Support: Fact and Fiction in State Child Support Guidelines." National Child Support Enforcement Association *Communique*, Fairfax, Virginia. (February 2015)

Jane C. Venohr (2013) "Child Support Guidelines and Guidelines Reviews: State Differences and Common Issues," *Family Law Quarterly*, vol. 43, no. 3 (Fall 2013).

Jane C. Venohr (2013) "Medical Support in Today's Child Support Guidelines and the Affordable Care Act." *Communique*, National Child Support Enforcement Association, Washington, D.C. (Dec. 2013)

Jane Venohr. (2011) "Child Support Guidelines: Recent Developments," *Communique*. National Child Support Enforcement Association (NCSEA) vol. 2, sec. 302-56, May 2011.

Jane C. Venohr and E. Tracy Griffith. (2005) "Child Support Guidelines: Issues and Reviews," *Family Court Review*, vol. 43, no. 3 (Summer 2005).

Jane C. Venohr and Robert G. Williams. (1999) "The Implementation and Periodic Review of State Child Support Guidelines," *Family Law Quarterly*, vol. 33, no. 1 (Spring 1999).

Jane C. Venohr (2006) "Behind Time-Sharing Adjustments in Child Support Guidelines," *2006 Family Law Update* edited by Laura Morgan and Ronald Brown, Aspen Publishers, NY, NY.