Comments on the 2025 Massachusetts Child Support Guidelines and Guidelines Worksheet

From: A Massachusetts child support payor
To: Hon. Heidi E. Brieger, Chief Justice of the Trial Court, One Pemberton Square, Boston, MA 02108
cc: childsupport@jud.state.ma.us
Date: ____________________

Dear Chief Justice Brieger:

The Child Support Guidelines Worksheet violates the federal rule that governs child support guidelines. While federal law requires every order to rest on the parent's ability to pay, 45 C.F.R. § 302.56(c)(1), and your Preamble adopts that standard, the Worksheet has no line for it. Massachusetts also orders more child support for joint custody than any other state, and joint custody here costs more than primary custody in 47 states.

I am asking the Trial Court for two things:

- **Base the Guidelines on net pay, starting with the hardship test.**
  - The study behind the schedule measures the cost of children in net income.
  - Your consultant already converts gross to net at every review.
- **Price joint custody with the cross-credit formula 19 jurisdictions use, and cap it at 30% of the payor's net pay until then.**
  - When both parents house the children half the time, each household carries most of its own costs.
  - The order should encourage both parents to stay in the children's lives.

In the worked example one parent works a demanding job earning $201,000 a year, while the other works part time and earns about $30,000, with three children in joint custody. With no child care claimed, the Worksheet sends 37.7% of the higher earner's net pay to the other household. With $300 a week of child care it sends 47.4%, close to half.

Orders this high discourage work on both sides. The higher earner has little reason to stay in a high-stress job when every raise is split with tax and the order, and the lower earner has no incentive to build earning capacity when the formula makes up the difference. In joint custody especially, where both parents share the children's time, both should be expected to work full time.

I built a model of the Worksheet line by line, ran the same case through every state's guidelines, and published all of it at checktheworksheet.org.

The Worksheet violates the federal rule that governs child support guidelines

Federal law sets a floor for every state's guidelines: the order must be based on the parent's "earnings, income, and other evidence of ability to pay," 45 C.F.R. § 302.56(c)(1), and meeting that floor is a condition of the Commonwealth's federal child support plan, § 302.56(a). The Guidelines' Preamble adopts those words as their own. The Worksheet that sets the amount then computes nothing after tax. It has no line for net pay, after-tax income or disposable earnings, and the words ability to pay are not on it. A form that does not know what a parent keeps cannot base an order on what he is able to pay.

The Worksheet produces orders the Commonwealth cannot lawfully collect

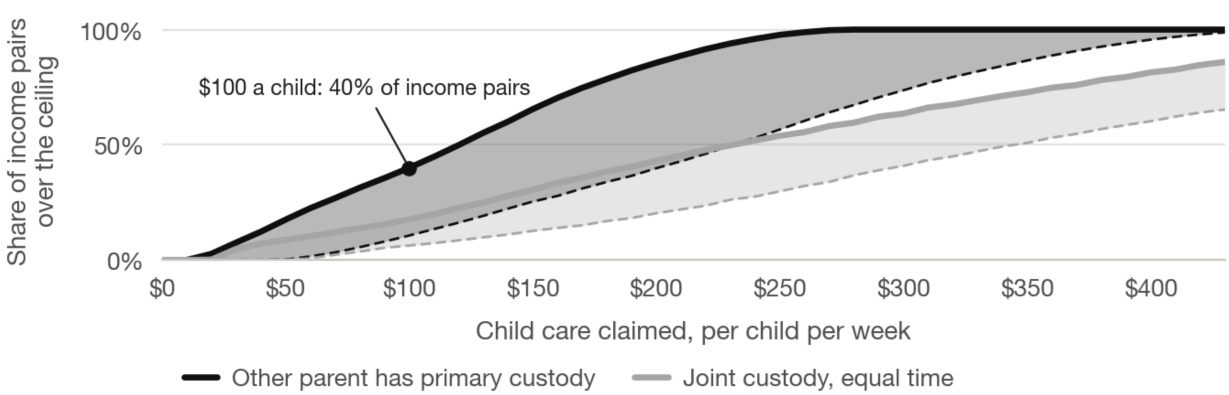
With child care claimed, the Worksheet produces orders above the federal ceiling on what may be withheld from a paycheck, which is 50 percent of net pay, or 60 percent for a parent with no second family to support. At $100 a week per child of child care, 40% of three-child primary-custody combinations produce an order over the ceiling. At the Guidelines' $430-per-child maximum every combination does, and the order reaches 186 percent of net pay at its highest.

With child care claimed, the Worksheet produces orders the Commonwealth cannot lawfully collect

Share of income combinations whose order is above the federal ceiling, by child care claimed per child per week.

CHILDREN 3 · INCOMES 1,147 pairs, payor $60,000 to $300,000

CHILD CARE $0 to the Guidelines' $430 limit



Notes: Shaded band: solid edge, share over the 50% ceiling (a payor with a second family); dashed edge, share over 60% (a payor with none), 15 U.S.C. 1673(b)(2). With no child care claimed, no order crosses either.

The Department of Revenue cannot lawfully collect those amounts in full. Child care is not an add-on outside the Guidelines. It is entered on the Worksheet, and the Worksheet adds it to the order, so the Guidelines themselves produce amounts the Commonwealth may not collect.

The Court promulgates the Worksheet and can correct it without waiting for anyone. The fix is the first ask below: measure available income after tax, and run the hardship test against it. Until the form carries one, I ask the Court to instruct that Line 7e be read against net pay, so the test the Guidelines already contain can fire on the orders it was written for.

Until then, an amount above the federal ceiling should not be treated as the presumptive order.

1. The hardship test measures gross pay, so it misses orders that take more than 40% of net pay

At the worked example's incomes the hardship test does not fire until the order takes 57% of the payor's net pay. While Section IV.C presumes a substantial hardship when an order takes 40% of the payor's gross pay, nobody pays a support order out of gross pay. With three children in joint custody and no child care claimed, 15.4% of income combinations (177 of 1,147) put the order over 40% of the payor's net pay. The hardship test fires on none of them.

The test misses ordinary incomes the same way. Two parents at $60,000 and $45,000 with three children: the order takes 42.8% of the payor's net pay, and the test reads 35.3%. Across the 1,147 income combinations I modeled, with three children in primary custody and no child care claimed, 41.2% (473 of 1,147) put the order over 40% of net pay. The hardship test fires on none of them.

Federal law caps what an employer may withhold for child support at 50 percent of a parent's disposable earnings, or 60 percent for a parent with no second family to support, 15 U.S.C. § 1673(b)(2). The Worksheet has no line for the payor's household, so it cannot tell which of the two applies. At the worked example's incomes with primary custody instead of joint, a $300 a week child care claim, well inside the Guidelines' own $430-per-child limit, puts the order at 50.2 percent of net pay, over the ceiling for a parent with a second family to support. At the Guidelines' maximum it reaches 82.5 percent. The Worksheet has no line that checks an order against it.

The fix changes no order. Measure the 40% test against net pay instead of gross. The same gross-pay reading sits in deviation factor 13, which compares the two households' standard of living on income before tax, and takes the same fix.

2. Child care should be split on the money each parent has after the order

Right now child care is divided on gross earnings before the order is paid. The payor's earnings are transferred to the other parent, and then the payor is charged for child care as if he still had all of that gross pay available. That is unfair, and it is large. At the worked example's incomes the payor holds 88% of the income before the base order, so he funds 88 cents of every dollar of child care the other parent claims. Measured on the money each parent actually has after the order and after tax, his share is 53%. Splitting a $300-a-week claim this way moves the Worksheet amount from $1,276 to $1,172 a week, which is roughly $5,415 a year.

Your consultant already does this arithmetic. From the 2025 Economic Review: "we calculated the net income equivalents of gross weekly income amounts for Massachusetts, since the guidelines use gross income and Dr. Betson's study uses net income." I am asking for that conversion on two lines of the form instead of on a chart. One fact runs against me: the calculation leaves out refundable tax credits, because the Worksheet does not collect filing status or which parent claims which child. Counting them would put the payor's share at 49.7%, three points lower than I am asking for.

A child care claim also needs no receipt unless someone asks for one, and a parent's own testimony satisfies the request. Writing a number on the form costs nothing. Contesting it costs more than the number in almost every case. The evidence should come with the claim.

3. Massachusetts joint custody is the most expensive in the nation, and the discount for it is negligible

Twenty-eight of the fifty-one jurisdictions reduce the order by some formula, the cross-credit or another, once a parent has the children a third of the nights. Hawaii, the most expensive state in the nation for primary custody, cuts its order 52% at equal time. Utah cuts 55%, Montana 52%. Massachusetts cuts 6.9%, and charges more for joint custody than 47 states charge for primary custody.

The usual defence is the cost of living, but the six places that cost more to live in than Massachusetts, California, Hawaii, the District of Columbia, New Jersey, New York and Washington, all order less for joint custody, as the enclosed exhibit shows. The discount comes from no rule about parenting time. It is a side effect of a cap on one line of the Worksheet, described in no published document.

Because the discount is so small, a parent who houses the children half the time pays nearly the full primary-custody order on top of those costs, so stepping back is the cheaper choice. Charging the most in the nation for joint custody pushes parents to give up custody, and that harms children, who do best when both parents work and both stay in their lives. A rule that rewards one parent taking the children and the other stepping back is an archaic picture of family life.

The fix is the formula 19 jurisdictions already use. The cross-credit works out what each parent would owe the other for the time the other has the children, adds 50% for the costs two households both carry, and has the parent who owes more pay the difference. At the worked example's incomes, with no child care claimed, it orders $701 a week where the Worksheet orders $1,013. Until the Worksheet carries it, and barring extraordinary circumstances, a joint custody order should never take more than 30% of the payor's net pay. The proposed Worksheet language is attached.

4. The Court should collect data on how often judges deviate from the Guidelines, and why

Separately, I support one thing already asked for. In December 2024 the Massachusetts Family Advocacy Coalition asked for deviation data to be collected on the Worksheet instead of the Findings form, and it was not adopted.

The Economic Review reports that judges deviated, imputed income or entered a default in 26% of all cases, and never reports the deviation rate on its own. In a separate sample of 259 cases, 14% of deviations gave no reason at all. That number is what tells you whether the presumption is rebuttable in practice or only on paper.

5. The Guidelines do not comply with federal law, and the Court should amend them now, not wait for the 2029 review

The Child Support Guidelines in their current state do not comply with federal law, and that requires an immediate review. The Trial Court has amended the Guidelines between reviews twice. In June 2018 it "reviewed two issues on which it received questions" and revised the age adjustment factors in the Worksheet. In July 2023, after a federal review, it clarified that incarceration may not be treated as voluntary unemployment. Every change I propose is the same kind, confined to one provision or one line of a form, and the proposed language is attached in the Trial Court's format, so adopting any of it requires no drafting.

Waiting four years has a cost. Every order entered between now and the next review will be computed on this Worksheet. A parent who wants to question the arithmetic cannot. The Guidelines, the Task Force report and the Economic Review describe the shared-parenting computation nowhere, so there is nothing published to point to. Federal law requires the presumptive amount to be rebuttable, 42 U.S.C. § 667(b)(2). A parent cannot rebut what has not been published. I ask the Court to adopt these changes now, by amendment, as it did in 2018 and 2023.

Respectfully submitted,

A data scientist who pays child support in Massachusetts
checktheworksheet.org

Enclosed: Charts of the orders against the federal ceiling · Exhibit on cost of living · Proposed language, section by section · The worked example, line by line · The fifty-one-jurisdiction comparison

These comments propose changes of general application only. The author pays child support in Massachusetts and has a stake in the outcome.

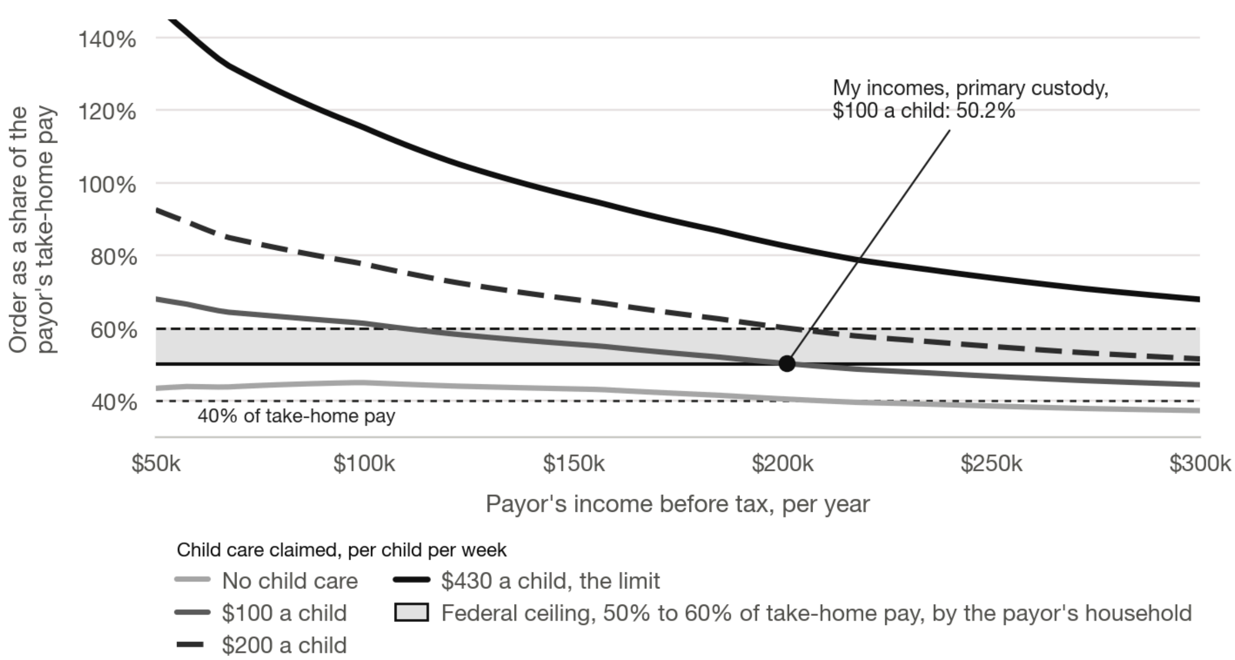
Exhibits — The Worksheet's orders against the federal ceiling

Accompanying: Comments on the 2025 Massachusetts Child Support Guidelines and Guidelines Worksheet

The more child care is claimed, the further the order goes over the federal ceiling

Pick a payor income along the bottom, read up to a line: that is how much of his take-home pay the order takes.

CUSTODY Other parent primary (Box 2) · CHILDREN 3 · OTHER PARENT $29,640 a year



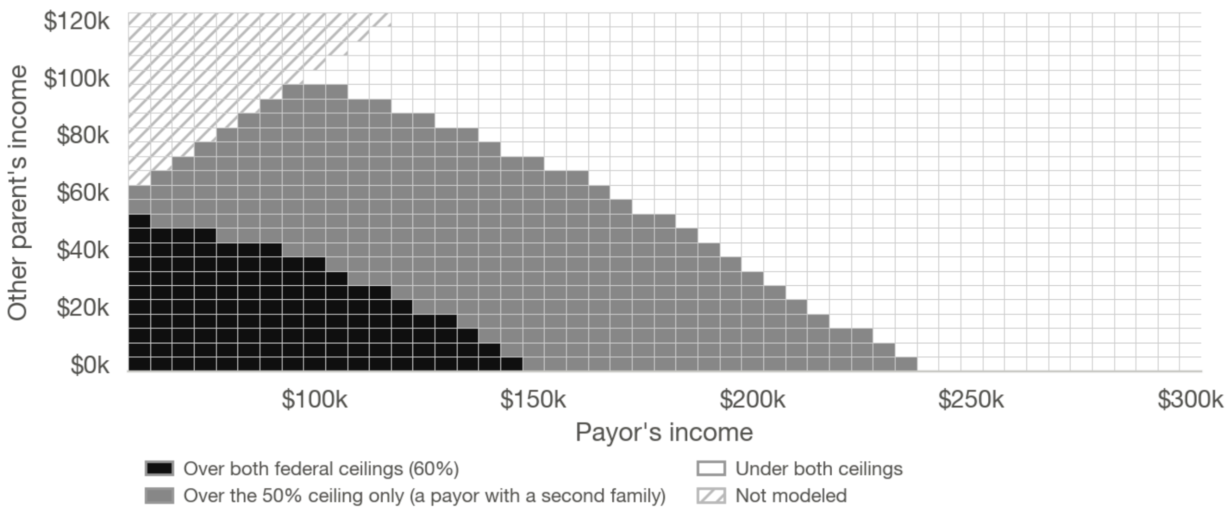
Notes: Federal ceiling, 15 U.S.C. 1673(b)(2): 50% of take-home pay for a payor who supports a second family, 60% for one who does not. Take-home pay is after federal and state tax, Social Security and Medicare.

Each line is the order the Worksheet produces at one child care claim, every one of them inside the Guidelines' own limits. Once a line rises above the federal ceiling, the order is more than federal law lets the Commonwealth collect. The Worksheet has no line that says so.

At $100 a child, 40% of income pairs produce an order over the federal ceiling

Each square is one pair of incomes: the Worksheet's order with $300 a week of child care claimed.

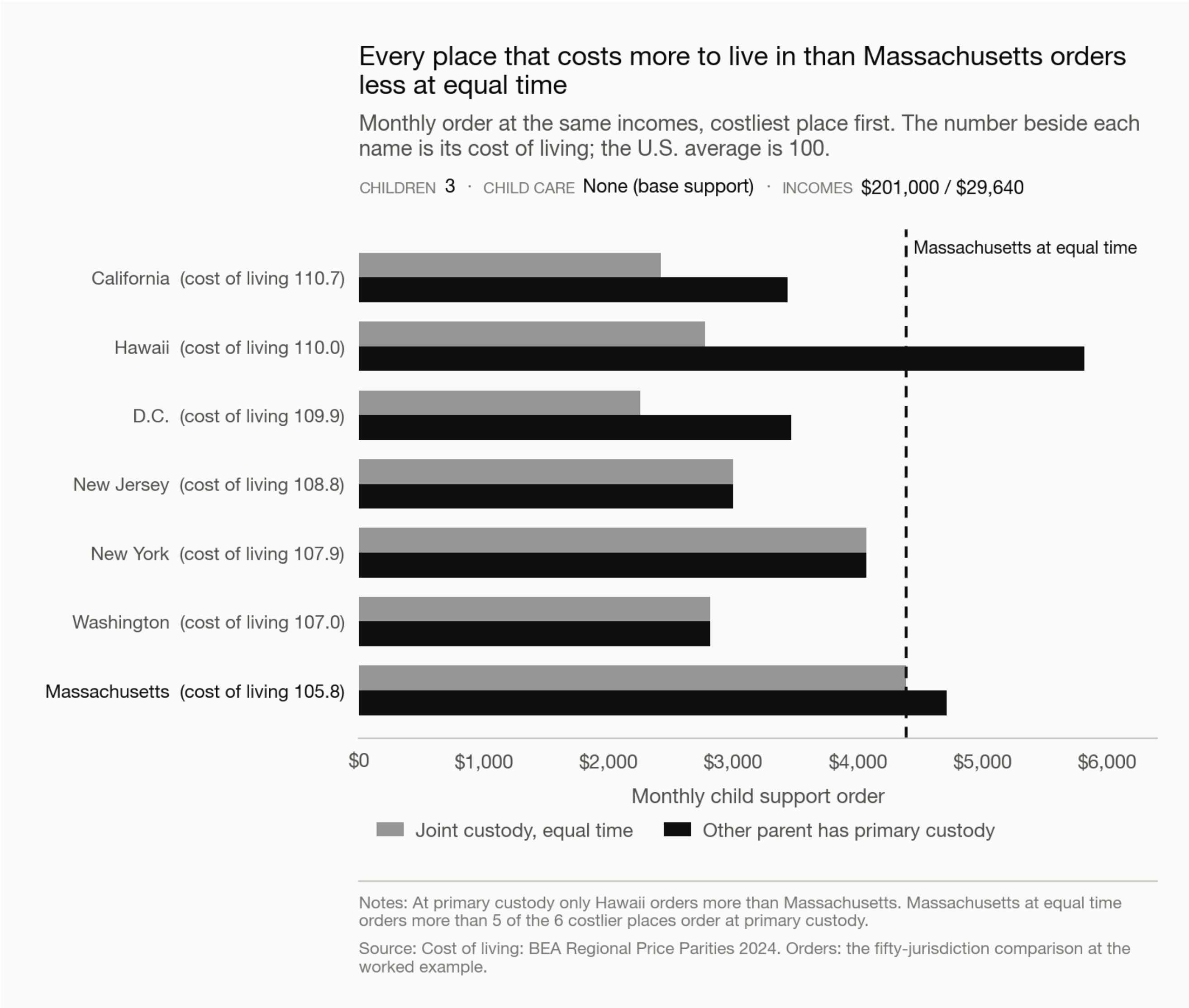
CUSTODY Other parent primary (Box 2) · CHILDREN 3



Notes: 40% of squares are over the 50% ceiling that applies to a payor with a second family, and 11% are over 60%, the ceiling for a payor with none. Hatched: pairs where the other parent would be the higher earner.

Each dark square is a pair of incomes for which the Worksheet, with a modest child care claim, sets an order larger than federal law lets the Commonwealth collect from the payor.

Exhibit — Cost of living does not explain the Massachusetts amounts

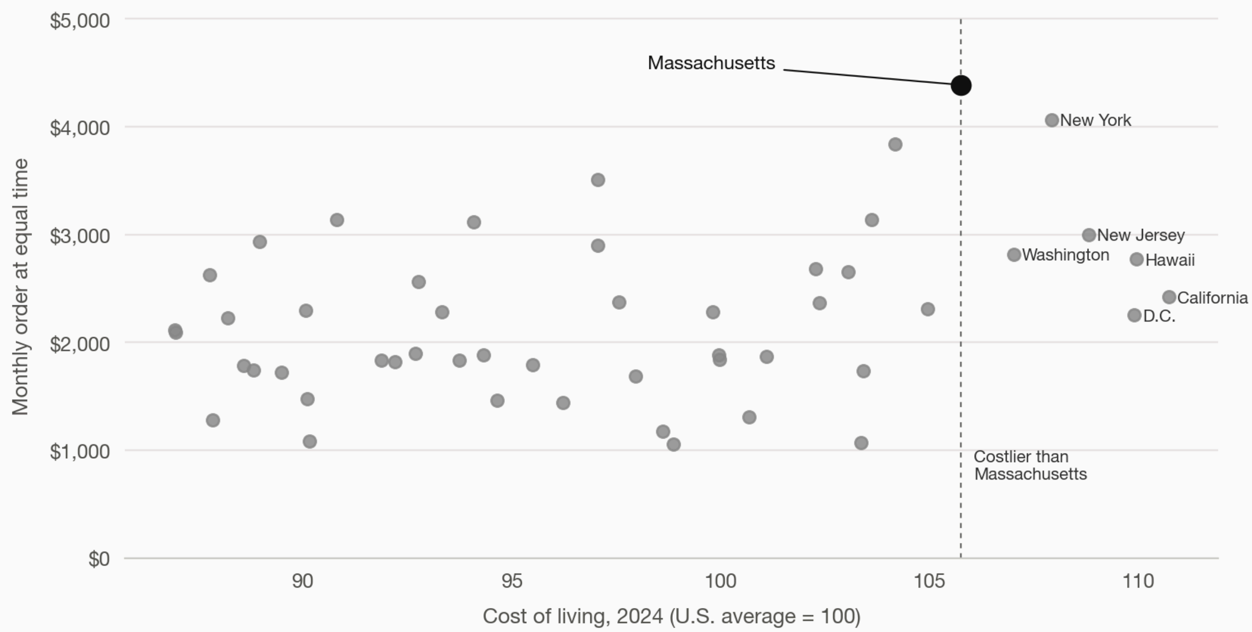


Six places cost more to live in than Massachusetts, and every one of them orders less for the same family at equal parenting time. Five of the six order less even when one parent has the children full time. Hawaii is the one exception at primary custody.

Massachusetts orders the most at equal time, and it is not the most expensive place to live

Each dot is one state: its cost of living against its equal-time order for the same family.

CHILDREN 3 · CHILD CARE None (base support) · INCOMES $201,000 / $29,640



Notes: Georgia is held out of the fifty-state comparison. Cost of living: BEA Regional Price Parities, all items.

Source: Cost of living: BEA Regional Price Parities 2024. Orders: the fifty-jurisdiction comparison at the worked example.

Across the fifty states, the cost of living does not track the equal-time order, and Massachusetts sits alone at the top.

Attachment 1 — Proposed language, section by section

Comments on the 2025 Massachusetts Child Support Guidelines and Guidelines Worksheet

Each item follows the Trial Court's comment format: section referenced, current language, suggested language, reasons. Figures are from the worked example disclosed in the comments (Box 1, joint custody, three children, $201,000 and $570 a week) unless stated.

A. The basis of the calculation

Section referenced: II.A (income), Worksheet Line 3a, Table A.

Suggested change: compute available income, and calibrate Table A, on income net of federal and Massachusetts income tax and of Social Security and Medicare withholding, on the convention the Economic Review already uses to convert the Chart to net terms (single filer, standard withholding).

Reasons: the Betson study underlying the schedule is denominated in net income. The Economic Review converts gross to net every cycle to compare the two. Moving the basis removes the need for items B through E, each of which corrects a place where the form measures gross pay instead of what a parent can pay. Items B through E are offered as the minimum if the basis stays gross; item F stands on its own regardless of the basis chosen.

B. The hardship test

Section referenced: IV.C and Worksheet Line 7e. Changes no support amount.

Current language: "Whenever application of the guidelines requires a payor to pay a recipient 40% or more of the payor's available income in Line 3a of the guidelines worksheet for a current child support order, there shall be a rebuttable presumption of a substantial hardship, justifying a deviation from the guidelines."

Suggested language: measure the 40% comparison, in Section IV.C and at Line 7e, against the payor's income net of federal and Massachusetts income tax and Social Security and Medicare withholding, rather than against Line 3a.

Reasons: Line 7e reports 26.5% on an order taking 37.7% of net pay, and reaches 40.0% only when the order takes 56.9%. At $60,000 and $45,000, three children, primary custody: 35.3% reported against 42.8% actual. With three children in primary custody and no child care, 473 of 1,147 income combinations put the order over 40% of net pay. Table A and every order are unchanged.

C. Deviation factor 13

Section referenced: IV.B, factor 13 (item 14 on form CJ-D 305). Changes no support amount.

Current language: "application of the guidelines would result in a gross disparity in the standard of living between the two households such that one household is left with an unreasonably low percentage of the combined available income"

Suggested language: after "combined available income" add ", measured on an after-tax basis."

Reasons: at the worked example the payor loses 30.4% of gross income to tax and the recipient 16.6%. The factor, read on Line 3c, registers none of the 14-point spread. With no child care the payor keeps $87,172 against $77,395 for the recipient's household (53.0%). With $300 a week of child care claimed, $73,493 against $75,474 (49.3%). Line 3c does not move, because it is computed before child care is entered. Limit: the convention understates the recipient's resources (head-of-household filing, refundable credits), which the Worksheet does not collect.

D. The child care split

Section referenced: II.E.1 and Worksheet Lines 6a, 6b, 6e. Changes a support amount.

Current language: child care costs "are shared by the parents in proportion to their share of combined available income."

Suggested language: "in proportion to their share of the income each parent retains after the base child support obligation and after federal and Massachusetts income tax and Social Security and Medicare withholding, computed for a single filer claiming no exemptions." On the Worksheet: add new Line 6b-1a, each parent's income on this after-tax basis, computed using the Payor and Recipient labels that Line 6f would assign if Lines 6a and 6b were both zero. Add new Line 6b-1, each parent's share of the two Line 6b-1a amounts, combined. Line 6b then uses the other parent's Line 6b-1.

Fallback, no tax computation: new Line 6b-2, each parent's share of Line 3a adjusted by the Line 7d amount that would result with Lines 6a and 6b at zero, divided by Line 3b. Payor's share 64.5%; order with $300 a week of child care $1,206 (from $1,276).

Reasons: Line 3c is computed before the base order at Line 5c re-weights the two households. Payor's share falls from 87.7% to 53.0% (net basis). Order with $300 a week of child care claimed goes from $1,276 to $1,172, $5,415 a year. Counting refundable credits would give 49.7%. They are excluded because the Worksheet collects neither filing status nor dependency claims.

E. Evidence for a child care claim

Section referenced: II.E.4 and Worksheet Line 2g. Changes no support amount by formula.

Current language: "The parent claiming the child care cost is responsible for providing reasonable evidence of the out-of-pocket expense actually paid after any discounts or subsidies, upon request."

Suggested language: strike ", upon request"; replace with "at the time the cost is entered on Line 2g of the guidelines worksheet. Reasonable evidence ordinarily consists of documentation of the amount actually paid, such as a provider statement, invoice, receipt, or record of payment. Where documentation is unavailable, the Court may accept other reasonable evidence and shall note the basis on the record."

Also: Commentary defining "subsidies" as employer-provided dependent care assistance, amounts excluded from income through a dependent care flexible spending arrangement, and any child care subsidy, voucher or scholarship from a governmental or private source; new Line 2h recording that amount, subtracted from Line 2g before Line 6a is applied. The federal child care tax credit is excluded; it depends on a whole return.

Reasons: at an 88% allocation an unsupported entry on Line 2g is worth 88 cents on the dollar to the parent who makes it, and contesting it costs more than the amount in nearly every case. The same reasoning applies to a payor who pays a provider directly.

F. The cross-credit formula for joint custody orders, with a ceiling until it is in place

Section referenced: II.D, IV.C and Worksheet Lines 5b, 6e and 7d (Box 1 and Box 3). Changes a support amount.

Suggested change: where Box 1 is checked, multiply each column's Line 5b by 0.75, which is the standard cross-credit multiplier of 1.5 applied at equal time, and do not apply the Line 6e limitation. Apply the Box 2 limitation at Line 7b to the resulting transfer instead, and enter no more than the Box 2 order for the same family. Under Box 1, child care either parent pays is split on the post-order shares in item D, and each parent is credited with what that parent pays. Until that change is made, where Box 1 or Box 3 is checked, the presumptive order may not exceed 30% of the payor's income net of federal and Massachusetts income tax and Social Security and Medicare withholding, absent a written finding of extraordinary circumstances under Section IV. Implemented as a new line after Line 7d that computes the ceiling and enters the lesser of the two amounts.

Reasons: worked example, Box 1: $1,013 a week, 37.7% of net, with no child care claimed, and $1,276 a week, 47.4%, with $300 a week claimed. The ceiling reaches 48.8% of three-child and 29.1% of two-child equal-time orders on the published income grid, so for families with more than one child it is a schedule for shared custody, not only a backstop.

Why the current discount is what it is, and why the cross-credit fixes it: under Box 1 each parent's column carries every child at the full Table B factor, which is a cross-credit with a duplication factor of 2.0, and the shared-parenting credit is the payor's own Line 6e. Line 6e's limitation caps an obligation under Box 2, where it protects the payor, and caps a credit under Box 1, where it takes from him. That is why the discount tracks the income gap and nothing else, running from 77.6% to 1.3% at a $201,000 payor as the other parent's income rises. Oldham and Venohr, 54 Fam. L.Q. 141, 152-53 (2020), report the duplication factor is 1.5 "in most states using the cross-credit formula." At the worked example with no child care claimed, the cross-credit at 1.5 orders $701.30 a week against $1,012.73, a cut of 30.8%. Nineteen jurisdictions use a cross-credit today. Box 3 follows the same path and has not been modeled.

G. A recommendation already submitted

Section referenced: the Worksheet and form CJ-D 305. Changes no support amount.

Suggested change: adopt the Massachusetts Family Advocacy Coalition's Recommendation 5 (December 2024) as submitted, without change: "Replace the Deviation section in the Findings form with a new Deviation section in the Guidelines Worksheet." One addition: the data collected should record the reason for each deviation and be sufficient to report the deviation rate separately from imputed income, attributed income and default.

Reasons: the Economic Review reports deviation, imputed or attributed income, or default in 26% of all cases. In a separate sample of 259 cases, 50% of deviations came from negotiated agreements and 14% gave no reason. The deviation-only rate and the success rate of contested deviation requests are unreported.

Attachment F: a worked example, line by line

Accompanying: Comments on the Massachusetts Child Support Guidelines and Guidelines Worksheet **Date:** September 18, 2026

Here is the tax arithmetic behind Sections 1 and 2 of the comments, worked with a calculator rather than a computer, with the source named for every constant it uses. The order figure comes from the Guidelines Worksheet itself and is not re-derived here; the tax steps that follow it are.

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1. The method

The Comments propose measuring net income the same way the Commonwealth's own consultant already does. The Economic Review of the Massachusetts Child Support Guidelines 2024–2025 (The Brattle Group, retained for the 2024–2025 quadrennial review), p. 52 of the printed report, explaining how it converts the chart to compare against Betson (2020), the child-cost estimates the review uses as its benchmark:

> "we calculated the net income equivalents of gross weekly income amounts for Massachusetts, since the guidelines use gross income and Dr. Betson's study uses net income. We made this adjustment using state-specific income withholding tables for Massachusetts and standard withholding for Social Security and Medicare."

That is the method this page applies: **net = gross − federal income tax − Social Security and Medicare − Massachusetts income tax**, the same formula for both parents, using a single filer claiming no exemptions and no dependents. No refundable credit, filing status, or claim to a dependent enters anywhere, because CJ-D 304, the Guidelines Worksheet itself, records none of them and a shared-parenting case commonly alternates who claims which child from year to year. About eight constants, each sourced below, are all this method needs.

2. The worked example

Payor: $201,000.00/yr gross ($3,865.38/wk), health premium $43/wk. Recipient: $29,640.00/yr gross ($570.00/wk), health premium $33/wk. Three children, Box 1 (equal parenting time), no child care claimed. Same worked example as the comments throughout.

3. Each parent's tax, deduction by deduction

Line	Constant	Source	Payor	Recipient
Gross income			$201,000.00	$29,640.00
Standard deduction (single filer)	$16,100	Rev. Proc. 2025-32 §3.14(1)	$16,100.00	$16,100.00
Taxable income (gross minus deduction)			$184,900.00	$13,540.00
Federal income tax (2026 single-filer brackets)	10/12/22/24/32/35/37%, at $12,400 / $50,400 / $105,700 / $201,775 / $256,225 / $640,600	Rev. Proc. 2025-32 §3.01 Table 3	$36,974.00	$1,376.80
Social Security	6.2%, capped at the $184,500 wage base	SSA 2026 COLA fact sheet	$11,439.00	$1,837.68
Medicare	1.45%, uncapped	IRC §3101(b)	$2,914.50	$429.78
Additional Medicare	0.9% of gross over $200,000	IRC §3101(b)(2)	$9.00	$0.00
Massachusetts exemption (single filer)	$4,400	M.G.L. c.62 §3(B)(b)(1)	$4,400.00	$4,400.00
Massachusetts taxable income			$196,600.00	$25,240.00
Massachusetts income tax	5.00%	M.G.L. c.62 §4(b)	$9,830.00	$1,262.00
Net income (withholding basis)			**$139,833.50**	**$24,733.74**

Federal tax, bracket by bracket, so the $36,974.00 and $1,376.80 lines can be checked.

Payor (taxable income $184,900.00, four brackets reached): 10% × $12,400.00 = $1,240.00; 12% × $38,000.00 = $4,560.00; 22% × $55,300.00 = $12,166.00; 24% × $79,200.00 = $19,008.00. Sum: $36,974.00.

Recipient (taxable income $13,540.00, two brackets reached): 10% × $12,400.00 = $1,240.00; 12% × $1,140.00 = $136.80. Sum: $1,376.80.

Neither party's Massachusetts figure needs a bracket table: the Massachusetts rate is a single 5% applied above the exemption (M.G.L. c.62 §4(b)), so it is one multiplication.

4. The support order

CJ-D 304's Line 7d, unrounded, is $1,012.7257/wk; to the cent, $1,012.73/wk. Annualized from the unrounded figure: $1,012.7257 × 52 = **$52,661.74/yr**. The Commonwealth's own form rounds after every line and gives $1,016 a week rather than $1,012.73, which changes nothing here.

5. Net position after the order

	Payor	Recipient household
Net income (withholding basis)	$139,833.50	$24,733.74
Support order	−$52,661.74	+$52,661.74
After the order	**$87,171.76**	**$77,395.48**
Share of the combined $164,567.24	53.0%	47.0%

6. Sources

Constant	Value	Source
Federal standard deduction, single filer	$16,100	Rev. Proc. 2025-32 §3.14(1)
Federal single-filer brackets, TY2026	see § 3 above	Rev. Proc. 2025-32 §3.01 Table 3
Social Security rate and wage base	6.2%, $184,500	IRC §3101(a); SSA 2026 COLA fact sheet
Medicare rate	1.45%, uncapped	IRC §3101(b)
Additional Medicare Tax	0.9% over $200,000	IRC §3101(b)(2)
Massachusetts personal exemption, single filer	$4,400	M.G.L. c.62 §3(B)(b)(1)
Massachusetts income tax rate	5.00%	M.G.L. c.62 §4(b)
CJ-D 304 Line 7d (the order)	$1,012.7257/wk unrounded	the Guidelines Worksheet, this worked example

Every constant above was checked against the primary source that states it, and every figure on this page can be reproduced from the constants and the Worksheet, with a calculator.

Attachment D — Child support for the same family in every state

Accompanying: Comments on the 2025 Massachusetts Child Support Guidelines and Guidelines Worksheet

This attachment backs the comparison in the comments: what each state's own guidelines order for one family, and where Massachusetts ranks.

Massachusetts orders the most for joint custody of the fifty jurisdictions ranked

The family is the worked example in the comments. One parent earns $201,000 a year and pays a $43 weekly health premium, while the other earns $570 a week ($29,640 a year) and pays $33. They have three children, two under 13 and one between 13 and 17, and wage income only. Each state's guidelines were applied twice: at equal parenting time, 182 and 183 overnights, and with the lower earner as primary parent and the higher earner at 122 overnights a year.

At equal time Massachusetts orders $4,388 a month, the highest of the fifty. New York's capped $4,068 is next, then New Hampshire at $3,839. With primary custody Massachusetts orders $4,714, second only to Hawaii at $5,821. Twenty-eight of the fifty-one jurisdictions reduce the order by formula when the other parent has 122 overnights, and Massachusetts is not among them.

I computed child support for this family under every state's guidelines and compared each to Massachusetts

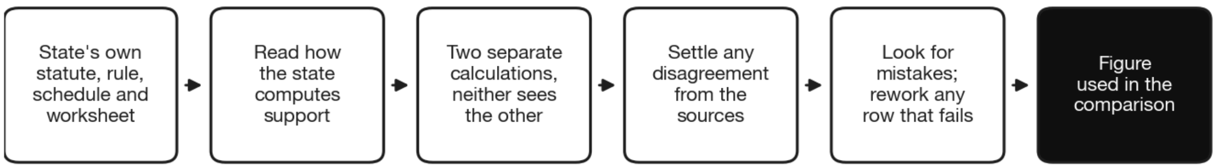
Each state's figures came from its own statute, court rule, schedule and worksheet, and went through the four checks below. I checked every figure the comments quote.

This is one family at one income level, and the figures are what each state's guidelines presume, not what any court ordered. Cost of living does not explain the ranking. On the federal cost-of-living index, where the national average is 100, Massachusetts is 105.8, and the six places that cost more (California 110.7, Hawaii 110.0, District of Columbia 109.9, New Jersey 108.8, New York 107.9, Washington 107.0) all order less for joint custody. Kansas, New York and Oklahoma are shown at their income caps. Georgia is left out because its new formula, read literally, charges less at one-third time than at equal time. The cost-of-living figures are the Bureau of Economic Analysis's Regional Price Parities for 2024.

Every state's figure went through the same four checks

How each state's order for the worked example was computed and checked.

EACH CHECK A separate AI analyst · STATES 50 ranked, Georgia held out



Notes: Test of the method: Massachusetts went through the same checks with no special handling and matched the Worksheet to within a dollar.

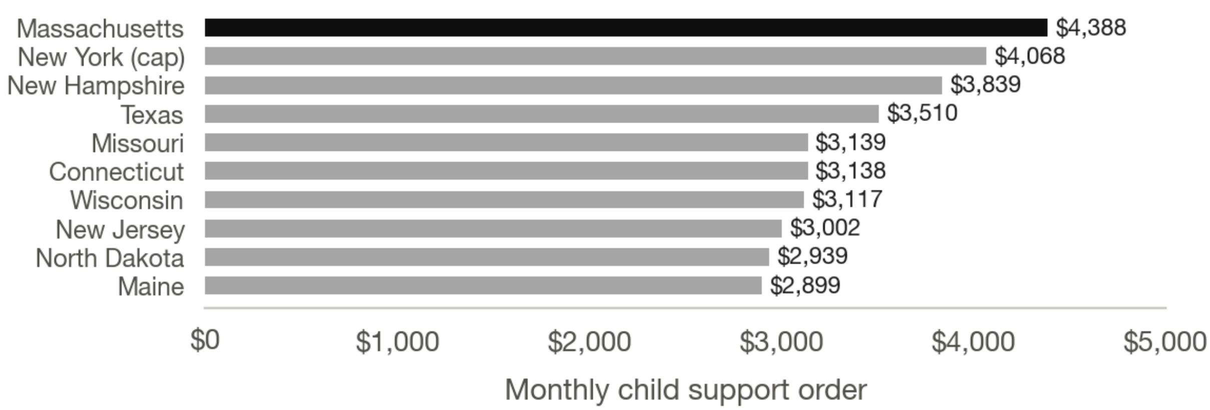
The fifty jurisdictions, highest equal-time order first

Massachusetts orders the most of any state for equal parenting time

Monthly order for the same family, ten highest of the fifty jurisdictions ranked.

CUSTODY Equal time, 182/183 nights · CHILDREN 3 · CHILD CARE None

INCOMES $201,000 / $29,640



Notes: New York is shown at its income cap. The full table of fifty follows.

Massachusetts has the longest bar: no other state orders as much for this family when both parents share the children equally.

Monthly amounts. "Formula credit at 122 nights" says whether the state reduces the order by formula when the other parent has the children 122 nights a year.

Rank	State	Equal time	Primary custody	Formula credit at 122 nights
1	**Massachusetts**	$4,388	$4,714	no
2	New York (cap)	$4,068	$4,068	no
3	New Hampshire	$3,839	$3,839	no
4	Texas	$3,510	$3,510	no
5	Missouri	$3,139	$3,139	yes
6	Connecticut	$3,138	$3,138	no
7	Wisconsin	$3,117	$4,492	yes
8	New Jersey	$3,002	$3,002	yes
9	North Dakota	$2,939	$3,219	yes
10	Maine	$2,899	$2,899	no
11	Washington	$2,820	$2,820	no
12	Hawaii	$2,774	$5,821	no
13	Rhode Island	$2,684	$3,123	no
14	Colorado	$2,652	$3,090	yes
15	Iowa	$2,630	$3,745	no
16	Ohio	$2,564	$2,564	yes
17	California	$2,424	$3,436	yes
18	Pennsylvania	$2,378	$3,087	no
19	Alaska	$2,368	$3,463	yes
20	Maryland	$2,310	$3,295	yes
21	Kansas (cap)	$2,297	$3,838	no
22	Indiana	$2,283	$2,548	yes
23	Delaware	$2,281	$3,991	yes
24	District of Columbia	$2,254	$3,468	no
25	Louisiana	$2,227	$3,269	no
26	Arkansas	$2,119	$2,350	no
27	Mississippi	$2,097	$2,565	no
28	Wyoming	$1,901	$2,802	yes
29	North Carolina	$1,883	$2,934	no
30	Illinois	$1,881	$3,038	no
31	Virginia	$1,872	$2,672	yes

Rank	State	Equal time	Primary custody	Formula credit at 122 nights
32	Nevada	$1,843	$2,485	no
33	Tennessee	$1,833	$2,031	yes
34	South Carolina	$1,832	$2,669	yes
35	New Mexico	$1,824	$2,795	no
36	Idaho	$1,794	$2,550	yes
37	South Dakota	$1,789	$2,623	yes
38	Alabama	$1,746	$2,736	no
39	Florida	$1,735	$2,513	yes
40	West Virginia	$1,724	$2,519	no
41	Vermont	$1,686	$2,594	yes
42	Nebraska	$1,475	$2,402	no
43	Montana	$1,461	$3,074	yes
44	Michigan	$1,445	$2,808	yes
45	Arizona	$1,309	$2,290	yes
46	Oklahoma (cap)	$1,284	$2,009	yes
47	Minnesota	$1,175	$2,271	yes
48	Kentucky	$1,088	$1,872	yes
49	Oregon	$1,072	$1,772	yes
50	Utah	$1,058	$2,333	yes

The per-row figures are published at checktheworksheet.org. The full record of each row, every document read and every defect found, is available on request.

End of Attachment D. Submitted with the Comments on the Massachusetts Child Support Guidelines and Guidelines Worksheet, which those comments sign.