Comments on the Massachusetts Child Support Guidelines and Guidelines Worksheet

To: Hon. Heidi E. Brieger, Chief Justice of the Trial Court
Massachusetts Trial Court, One Pemberton Square, Boston, MA 02108

cc: childsupport@jud.state.ma.us

Re: Suggested amendments to the 2025 Child Support Guidelines and Guidelines Worksheet

From: Christopher Campbell

Date: 3 September 2026

What I am asking for

1. **§ IV.C and Worksheet Line 7e** — the substantial-hardship threshold is measured against pre-tax income while the obligation is paid from after-tax income, so it engages later than its own text implies.
2. **§ II.E.1 and Worksheet Line 6b** — child care is allocated on each parent's share of income measured before the base order has re-weighted their resources. One calculation uses two income measures. A redline follows, and it changes amounts.
3. **§ II.E.4** — "reasonable evidence" of a child care cost is owed only on request and may be the claiming parent's own testimony, and "after any discounts or subsidies" is defined nowhere and recorded nowhere on the Worksheet.
4. **§ IV.B.13** — the same units problem as item 1, in the deviation factor written to compare the two households' standards of living.
5. **Worksheet Lines 5b and 6e** — the credit for equal parenting is the payor's own Line 6e, and Line 6e reduces it by reference to the other parent's income. The limitation operates in a payor's favour under Box 2 and against him under Box 1. Two redlines follow, and both change amounts.
6. Two recommendations already before the Task Force, on mandatory financial disclosure and on deviation data.

None of these changes Table A or anything committed to the Legislature. Three of them, the redline in Section 2 and the two in Section 5, would change the presumptive amount at this family's incomes; I say so and give the figures where they appear. The rest change no amount.

Scope

These comments are about the internal consistency of the Guidelines' own mechanics. Each one asks that a provision measure what it says it measures. Apart from the Section 2 and Section 5 redlines just noted, nothing here asks for a different amount of support.

I am writing outside a review cycle and to the Chief Justice's office rather than to a sitting task force, for the reasons in § 7. I have followed the format the Trial Court asks of comments on the Guidelines anyway: the section to be changed, the suggested language, and the reasons.

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1. Section IV.C measures hardship in units the obligation is not paid in

Section referenced: Section IV.C; Guidelines Worksheet Lines 3a and 7e.

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:

> "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~~ **as adjusted to an after-tax basis, for a current child support order,** there shall be a rebuttable presumption of a substantial hardship, justifying a deviation from the guidelines. **The Worksheet shall compute this comparison at Line 7e using the payor's available income net of federal and state income tax and FICA.**"

Reasons.

Section IV.C is a diagnostic. It sets no amount; it identifies when an amount has become a hardship. Whether the Guidelines should be calibrated on gross income is a separate question, and I take no position on it here.

The 2025 Commentary says the 40% language "is consistent with the calculation in the guidelines worksheet." It is. Line 7e computes exactly the quantity that sentence names. My question is about the quantity, not about whether the form follows the sentence.

A support order is paid out of after-tax income. A threshold stated in pre-tax terms therefore does not measure the thing it names, and the gap between the two grows with the payor's effective tax rate. The provision engages latest for exactly the payors with the largest gap between gross and net. That is the reverse of the ordering its purpose implies.

The Task Force knows the underlying issue. Its Economic Review records that "again in this review, as prior task forces have done, the Task Force discussed the use of gross versus net income in the guidelines. Ultimately, it decided not to recommend a change from gross income to net income at this time," and that "we expect this issue will once again be considered as part of the next guidelines review." The same review notes the Task Force discussed "the Child Tax Credit and the Earned Income Tax Credit that can materially affect a household's available income, especially in lower-income families."

I am not asking the Task Force to reopen that question. I am asking only that the hardship diagnostic be stated in the units in which hardship is felt. Table A, the tranches, and every support amount stay exactly as they are.

A worked example, and a disclosure. The example used throughout these comments is my own child support calculation, with the parties shown as Parent A and Parent B. I am using it because it is a real order under the 2025 Guidelines rather than parameters chosen to produce a result. I have no request pending before the Task Force and seek nothing in my own case from these comments, which propose only changes of general application. One of them, in Section 5, would lower the order in this example by up to 30.8% if it were adopted, and I would rather put that in front of you here than have you find it there. My order is fixed by an existing judgment; a change to the Guidelines would reach it only if it were modified on other grounds, and I am not seeking that. I do not think a proposal should be discounted because the person making it can work out what it would mean for him, but you are entitled to know, and to weigh it.

Two parents, three children aged 5, 8 and 14, Box 1 (shared). Parent B earns $201,000 per year and pays a $43 weekly health premium. Parent A reports $570 weekly and pays $33. Combined available income is well inside the presumptive range; there is no imputed income, no dependency benefit, and no child aged 18 or over, so the example runs the ordinary path through the Worksheet and Table C does not engage.

Weekly child care claimed	Presumptive order	Line 7e reports	Order as % of payor's after-tax income	Hardship box
$0	$1,013	26.5%	37.7%	—
$100	$1,100	28.8%	40.9%	—
$300	$1,276	**33.4%**	**47.4%**	—
$589	$1,529	**40.0%**	**56.9%**	**checked**
$1,290 (the § II.E.1 maximum)	$2,144	56.1%	79.7%	checked

Line 7e first reaches 40% when claimed child care reaches about $589 per week. That is roughly $196 per child, and about 46% of the $430-per-child benchmark the Guidelines themselves allow. At the moment the presumption becomes available, the payor is already sending about 57% of after-tax income to the order. In this example the gap between what Line 7e reports and what the payor is actually paying is about 17 percentage points, and it widens as the payor's effective tax rate rises.

So the trigger is reachable. The Guidelines are not inoperative. But it fires well after its own text says it should, and last for the payors it was written for.

Supporting analysis is attached (Attachment B: worksheet.py, net_position.py, box1_fix.py, childcare_post_transfer.py and submission_figures.py, with their test suites).

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2. The Worksheet allocates child care on an income measure it has already adjusted away from

Section referenced: Section II.E.1; Worksheet Lines 2g, 3c, 6a and 6b.

Section II.E.1 allocates child care "in proportion to their share of combined available income." Worksheet Line 6b implements that as *the other parent's Line 3c × this parent's Line 6a*. Line 3c is a pre-transfer measure. It is each parent's share of combined available income before the base support calculation at Lines 3e–5c has re-weighted the parties' resources. The second expense is therefore allocated on a distribution that no longer exists once the first transfer is made.

In the worked example, Parent A's Line 3c is 12.32% and Parent B's is 87.68%.

Child care claimed by Parent A	$15,600/yr ($300/wk)
Increase in the presumptive order	**$13,678/yr** ($263/wk)
Proportion of the claimed expense funded by Parent B through the order	**88%**

Parent B funds 88% of the expense because Parent B held 88% of pre-transfer available income, a share Parent B no longer holds once the base order at Line 5c has been applied.

The allocation is also blind to the parenting arrangement. Lines 6a and 6b contain no parenting-time term, and Line 3c is a pure income share, so the box checked at Line 1b makes no difference to how child care is allocated. In the worked example the allocation to Parent B is $263.05 per week under Box 1 and $263.05 under Box 2.

The reverse direction is not symmetrical, and I do not think it was meant to be. Where the payor pays the provider directly, the payor's nominal entitlement is the other parent's 12.32% share.

Under Box 2 it arrives in full. The order falls by $36.95 per week. Under Box 1 the order falls by $5.19.

The cause is Line 6e. Under Box 1, Line 6d for the payor's column is 4.97%, below the 10% threshold, so 6e is limited to *"((6d + 10%) x the other parent's 3a)"*, and the other parent's Line 3a is $537. The credit passes through at the ratio of the two available incomes, about 14%. Under Box 2, Line 6d reads "N/A", 6e equals 6c, and no limit applies.

A payor who shares parenting equally therefore recovers less for child care paid directly than a payor whose children live mainly elsewhere, roughly 1.7 cents on the dollar against 12.3. That is the opposite of the ordering the arrangement would suggest, and it comes from a low-income protection at Line 6e operating on a line it was not written for.

Where both parents pay child care, the two features compound. The scenario below assumes each parent separately incurs $300 per week of work-related child care during their own parenting time, so combined spending is $600 per week rather than $300. I state that as an assumption, not a finding. The Guidelines collect no data on how child care spending behaves under shared parenting. If the combined figure is lower, the effect scales down in proportion; the mechanism does not change.

	Presumptive order	Payor retains	Recipient household holds	Payor's share
Neither parent pays child care	$1,013/wk	$87,172	$93,821	48.2%
Recipient alone pays $300/wk	$1,276/wk	$73,493	$91,900	44.4%
Each parent pays $300/wk	**$1,271/wk**	**$58,163**	**$91,630**	**38.8%**

Combined child care across the two households is $31,200 a year. Of that, $29,008, or 93%, is borne by the payor, who also earns 87.15% of combined gross income. The payor's own $15,600 of child care reduces the presumptive order by $270 a year, because of the Line 6e limit described above. Line 7e reports 33.2%. The payor's order and own child care together consume 58.4% of after-tax income.

The caveat belongs here as much as anywhere. Per person the payor still leads, $58,163 supporting one against $22,907 each for four. The point is not that the payor is worse off in every sense. It is that the Worksheet allocates a cost incurred in two households as though it were incurred in one, and then declines to credit the payor's own share of it.

Suggested language (Commentary to Section II.E.1, added):

> "**The allocation of child care costs at Line 6b is made on each parent's share of combined available income and is not affected by the parenting schedule selected at Line 1b. Where a parent has paid child care directly and that parent's Line 6d is below 10%, the limitation at Line 6e may reduce the resulting credit substantially below the other parent's proportional share. The Court may consider whether that result is appropriate in the circumstances.**"

I am not suggesting that Line 3c is the wrong basis as a matter of policy. Allocating a shared expense by relative means is a coherent rule. What I am pointing out is that the Worksheet applies two different income measures inside one calculation. The base obligation re-weights the parties' resources, and the child care allocation is then computed as though it had not. The correction is to measure the shares after the base order, in the units the Worksheet already uses.

Suggested language (Section II.E.1):

> "in proportion to their share of combined available income **as adjusted by the base child support obligation**"

Suggested language (Worksheet, new Line 6b-1 and Line 6b):

> "**6b-1. Adjusted income share.** For each parent, Line 3a reduced (for the Payor) or increased (for the Recipient) by the weekly amount Line 7d would show if Lines 6a and 6b were zero, using the Payor and Recipient designations Line 6f would give in that case, divided by Line 3b."
>
> "**6b.** ~~Other parent's Line 3c~~ **Other parent's Line 6b-1** × this parent's Line 6a."

At the worked example, Parent B's share of the $300 a week falls from 87.7% to 64.5%, and the order with child care falls from $1,276 to $1,206 a week, $3,624 a year (`model/childcare_post_transfer.py`). Measured on after-tax resources the share would be 48.2%, but that needs a tax computation the Guidelines do not make, and I do not ask for one here.

Line 3c remains the right basis for the base obligation itself. The point is narrower: child care is a second allocation computed after the first, and by then the parties' shares have changed. The new line needs a second pass through Line 6f with child care suppressed, which is more than § 1 asks of the form, and it changes an amount; I say both. If either is the objection, the disclosure below is the adoptable version and costs nothing.

Suggested language (Commentary to Section II.E.1, added, as a fallback):

> "**The proportional allocation at Line 6b is computed on each parent's share of combined available income at Line 3c, which is measured before the base support obligation is applied. A parent's share of child care under Line 6b will therefore exceed that parent's share of resources remaining after the base order.**"

The Commentary language is a disclosure, not a change to any amount. It costs nothing, and it lets a court and the parties see what the line is doing.

This section and § 3 belong together. The allocation rule decides how much of a claimed expense a payor funds; § II.E.4 decides how easily the expense can be claimed. 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 that in nearly every case where the question could arise.

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3. "Reasonable evidence" is owed only on request, and "subsidies" is defined nowhere

Section referenced: Section II.E.4 and the Commentary to it; Worksheet Line 2g.

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."

Commentary: "Reasonable evidence may include a parent's credible testimony."

Suggested 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~~ **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.**"

Reasons.

The Task Force added § II.E.4 this cycle, which says it recognises that claimed child care costs need substantiating. Two features of the provision as adopted limit what it can do. The obligation arises only "upon request," and the Commentary lets the standard be met by the claiming parent's own testimony.

The result is lopsided. Entering a child care figure on Line 2g costs nothing. Testing it means requesting evidence and then contesting credibility, the most expensive kind of factual dispute there is, over an amount that will usually be smaller than the cost of contesting it. A provision with that cost structure works the same way whether the claim is accurate or not.

The suggested language keeps the Court's discretion to accept non-documentary evidence where documentation genuinely does not exist, as it often will not for informal or family-provided care. It makes documentation the ordinary expectation instead of something a party has to ask for.

The same sentence has a second gap. Section II.E.4 already limits the claimable amount to what was "actually paid after any discounts or subsidies." Neither the Guidelines nor the Commentary says what a subsidy is, and the Worksheet has no line to record one. The phrase does no work.

The clearest case is an employer dependent care flexible spending arrangement. The 2026 limit is $7,500, the first permanent increase since 1986, and those dollars are excluded from income before federal tax, Massachusetts tax and FICA. A parent contributing the full amount avoids roughly a third of it in tax. Those dollars were never taxed and were never out of pocket in any ordinary sense, and nothing on the Worksheet stops the gross figure from being entered at Line 2g. The same is true of a child care voucher, scholarship or subsidy from any governmental or private source.

Suggested language (Commentary to Section II.E.4, added):

> "**For purposes of this section, amounts 'actually paid after any discounts or subsidies' are net of employer-provided dependent care assistance and of amounts excluded from income through a dependent care flexible spending arrangement, and net of any child care subsidy, voucher or scholarship received from a governmental or private source. The parent claiming the cost should state whether any such amount was received.**"

Suggested Worksheet change: a new line after 2g, captioned "**2h. Employer dependent care assistance, dependent care FSA reimbursement, or child care subsidy received (weekly).**", subtracted from Line 2g before the Line 6a benchmark is applied.

I am not asking that the federal Child and Dependent Care Credit or the Massachusetts child care expense deduction be netted. Those depend on a party's whole return, cannot be computed on the Worksheet, and would raise the tax question the Task Force has deliberately set aside. Dependent care assistance and subsidy amounts need no tax computation at all. The claiming parent knows them, and they appear on Form W-2, Box 10.

This applies symmetrically. A payor who pays child care directly and enters it at Line 2g is in precisely the same position. And it supports the recommendation at § 6.

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4. Factor 13 compares standards of living in a currency neither household spends

Section referenced: Section IV.B.13; CJ-D 305 item 14.

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:

> "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, **measured on an after-tax basis and inclusive of refundable tax credits received by either household**"

Reasons.

This is the units problem of § 1 in a second provision, and I will not repeat the argument. What differs is the subject. Factor 13 is expressly a standard-of-living comparison, and standard of living is a function of post-transfer resources, not pre-tax income. A household-level comparison is already an accepted ground for deviation under the Guidelines; the suggestion changes only the measure, not the ground.

In the worked example, Parent B's effective rate on $201,000 is about +30.4%. Parent A, filing as head of household with three qualifying children, has an effective rate of about −38.9%: negative, because refundable credits exceed the tax owed. Four refundable credits reach that household. The federal Earned Income Tax Credit, the refundable part of the federal Child Tax Credit, the Massachusetts EITC at 40% of the federal credit, and the Massachusetts Child and Family Tax Credit at $440 per dependent (M.G.L. c. 62, § 6(x)). That is a 69-point spread in the rate at which each household turns gross income into post-transfer resources, and Factor 13 sees none of it.

	Payor retains	Recipient household holds	Payor's share of post-transfer resources
No child care	$87,172	$93,821	48.2%
$300/wk child care	$73,493	$91,900	44.4%

Three things have to be said about this table, and I would rather state them than leave them to the reader. Per person the payor is still ahead: $87,172 supporting one person against $23,455 each for four. A household comparison and a per-person comparison point in different directions, and Factor 13 asks for the household one. The Massachusetts Child and Family Tax Credit reaches only dependents under 13, so at the ages used here it reaches two of the three children; if it reached none, the recipient's effective rate would be −35.9% rather than −38.9%, and the conclusion would not change. And the reason the gap is this wide is the −38.9% itself: the recipient household's refundable credits exceed its tax. That is a fact about the tax code, not about either parent, and a reader may fairly think it a reason the Guidelines need not intervene. I include it because Factor 13 asks about standard of living, and public support is part of a household's standard of living whether or not the Guidelines count it.

Per person the payor remains ahead. Factor 13 measures households, not people, and at the household level the two sides have already crossed while a factor denominated in "combined available income" still reports them as roughly comparable. The factor cannot detect the condition it names.

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5. The Worksheet's credit for equal parenting time shrinks as the income gap widens, because it contains no parenting-time term

Section referenced: Guidelines Worksheet Lines 1b, 5b, 6d–6e and 7a–7b; Section II.D.

Before the mechanics, something about where they live. Section II.D.2 provides that information about the parenting arrangement "is entered directly into the guidelines worksheet," and that "the guidelines worksheet will calculate the presumptive child support order based on the information entered into the guidelines worksheet." The calculation belongs to the form. I searched the 2025 Guidelines, the Task Force's report and the Economic Review for the lines that perform it. "6d," "6e" and "income disparity" return nothing in any of the three. Of the two places the Economic Review uses "shaded," one concerns the Chart's low-income area and the other a table of court-division deviation rates. Neither concerns these lines. Neither does any form of "duplicate," so the cost question those lines implicitly answer, whether two households providing a residence for the same children cost more than one, was not examined in this cycle either.

I am not suggesting anything was concealed. The Worksheet is a public form and was an appendix to the Task Force's own report. What it means is that what follows is not a disagreement with a judgment the Task Force made. It is an account of a computation that fixes the presumptive order in every shared-parenting case in the Commonwealth and that no published document sets out or explains. That seems to me a better reason to look at it again than any argument I could make about whether the result is fair.

The Worksheet takes parenting time as a categorical input at Line 1b: Box 1 (shared approximately equally), Box 2 (children primarily with one parent, approximately two-thirds of the time), or Box 3 (split). No quantity of parenting time enters the arithmetic at any later line. The boxes work by changing the number of children entered in each parent's column at Lines 1d–1f. Under Box 2 the payor's column carries zero children, so the Table B factor for that column is 0.00 and Line 6g reduces to the difference between the two parents' income shares.

The reduction a payor receives for having the children half the time rather than a third is therefore a function of the parties' relative incomes and of nothing else. Holding the children, their ages and the parenting arrangement constant, and varying only the income split:

Payor's share of combined available income (Line 3c)	Box 2 order	Box 1 order	Reduction for equal shared parenting
56.3%	$934	$209	**77.6%**
66.0%	$985	$478	51.5%
76.6%	$1,040	$826	20.5%
87.7%	$1,088	$1,013	**6.9%**
95.8%	$1,123	$1,108	**1.3%**

(Three children under 18; health premiums as in the worked example; only the lower earner's income varies.)

Two parents in identical arrangements, each caring for three children half of the time, receive recognition for it ranging from 77.6% to 1.3% depending on how far apart their incomes are. What is the 6.9% compensating for? The Guidelines do not say, because no parenting-time or cost quantity enters the calculation at any line.

The arithmetic behind that is short enough to set out in full. Under Box 1 both columns carry every child, so Line 4c is the same figure in each column. Each column's Line 5b is that figure multiplied by the *other* parent's income share. Under Box 2 the payor's column carries no children, so his Line 5b is nothing and the order is Line 4c multiplied by his own income share. Subtract one from the other and an identity falls out: the credit for equal parenting is the payor's own Line 6e, exactly, and nothing besides.

Two separate things reduce that quantity. The first is that his column entitlement is Line 4c multiplied by the *recipient's* income share, so the less the other parent earns, the less he is credited for having the children half the time. At the worked example that is $152.84 against a $1,240.73 obligation. The second is Line 6e itself. His entitlement is small relative to his income, so Line 6d comes to 4%, below the 10% threshold, and Line 6e then limits him to roughly 10% of the *other parent's* income. That removes a further $77.67 and leaves $75.17.

Line 6e is the income-disparity limitation, and the same device appears at Lines 7a and 7b. There, under Box 2, it caps what a payor can be ordered to pay by reference to the share of her own income the other parent devotes to the children, and it protects him. Under Box 1 the Worksheet applies it to both columns symmetrically, and on the payor's column the quantity being limited is not an obligation but a credit. The sentence that shields him in one box takes from him in the other. This is the narrowest defect in this submission: one line, no policy judgment, no change to any schedule.

Set the limitation aside and Box 1 turns out to be a formula that is not unusual at all. Of the fifty-one jurisdictions surveyed for Attachment D, twenty-eight apply some formula-based reduction for shared parenting, and the common shape is a cross-credit. Each parent's obligation to the other is the basic obligation, raised by a factor for the costs two households duplicate, allocated by income share, then multiplied by the share of time the other parent has the children; the two are netted. I have not classified all twenty-eight by mechanism, and I do not claim they all use this one. Box 1 without the Line 6e limitation is that formula, at equal time, with the duplication factor set to 2.0. That is simply what it means for both columns to carry every child at Table B: two households, each charged in full for three children.

A larger duplication factor produces a larger transfer, so 2.0 is not a generous assumption but the most severe one available, and I can find no published estimate supporting it. Indiana's Commentary, quoted above, puts a number on the question, and it is the usual one. Oldham and Venohr report that twenty-three states use the cross-credit formula, most of them raising the basic obligation by 50% "to account for some child-rearing expenses being duplicated when both parents have substantial access," which is a factor of 1.5. J. Thomas Oldham and Jane Venohr, The Relationship Between Child Support and Parenting Time, 54 Fam. L.Q. 141, 152–53 (2020).

That gives a way to say what equal parenting is currently worth in the units the question is actually about. The cross-credit can be solved for the share of overnights that would produce the order Massachusetts in fact produces. Every parent in the table below has the children half of the time.

Payor's share of combined available income (Line 3c)	Box 1 order	Priced at a factor of 1.5	Priced at a factor of 2.0
60.8%	$340	46.4%	50.0%
68.4%	$536	43.9%	50.0%
76.6%	$826	36.0%	46.2%
81.5%	$920	34.4%	46.2%
85.1%	$977	33.6%	46.5%
87.7%	$1,013	**33.3%**	46.9%

Against Indiana's factor, a parent at this family's incomes who has the children half of the time is credited as though he had them a third of the time. I should be exact about what that is and is not. It is the last row of the table, which is the worked example's own income split, and it is not the typical case: across the rest of the range the figure runs between 33.6% and 46.4%. What holds generally is the direction and the slope, not the coincidence with one third. Against the 2.0 the Worksheet's own arithmetic already implies, the answer is 46.9%, and the entire shortfall from half is the Line 6e limitation. The two benchmarks disagree about the size and agree about the direction. Below $391 of available income Line 5c substitutes a fixed amount from the shaded area of the Chart, at which point the order is not a cross-credit at all and cannot honestly be expressed as one, so those incomes are left out of the table.

One third is also the figure the Guidelines assign to Box 2. So on this fact pattern, checking the box for equal parenting moves the order by very little because it produces close to what the primary-custody box already produces.

On the cost side I assert no figure of my own. Massachusetts has not estimated the additional cost of housing and transporting children for a greater share of the time, and this submission does not supply one. Two things a reader can check. Housing is consistently the largest single component of child-rearing cost in the federal estimates, 26% to 33% of the total in the United States Department of Agriculture's *Expenditures on Children by Families*, and it is the component least reducible by a time split, because a residence for the children must exist in both households regardless of the overnight count. And at least one other state's guidelines commission has quantified this directly. Indiana's Child Support Guideline 6 Commentary provides that where parents share parenting equally, 50% of the Basic Child Support Obligation is assumed to be "duplicated," 35.4% "transferred," and the remaining 14.1% "controlled" by one parent.

I applied this fact pattern to all fifty states and the District of Columbia. For each jurisdiction, one analysis read the state's own statute, court rule, schedule and worksheet and recorded its structure. Two further analyses then computed the order independently from that record without seeing each other's work. Disagreements were adjudicated against the primary source, and a final analysis tried to find an error in the recorded structure. Each of those analyses was performed by an AI language model working from the primary documents under written instructions. Attachment D describes the method, names every source, and lists every document downloaded. Massachusetts went through the same process blind, as a control, and reproduced the worksheet figures above to within a dollar.

I report only the jurisdictions whose figures survived every stage. Thirty did on the first pass. I then reworked the twenty-one that had not, in two further passes, the second of them from the states' own documents downloaded for the purpose, and each reworked figure went through the same independent recomputation and adversarial check. Twenty more survived, and I report fifty in all. Three of the fifty, Kansas, New York and Oklahoma, are the mandatory amounts at those states' income caps, with everything above the cap left to the judge, and they are labelled as such wherever they appear. The one I do not report is Georgia, whose newly enacted parenting-time formula, read literally, produces a lower order at one-third time than at equal time. Five analyses agree that is what the text says, and the worked example in the Georgia Commission's own calculator guide reproduces the same formula to the cent. I would rather not rank a result the statute's own explanation of the adjustment seems not to intend, even though the state's calculator produces it. It falls well below Massachusetts on both scenarios either way.

Among the fifty, on equal shared parenting, Massachusetts produces the highest presumptive order, $4,388 per month. New York's cap-bound $4,068 is next. Among states whose schedules reach this income, the next highest is New Hampshire at $3,839, which Massachusetts exceeds by about 14%. On the primary-custody scenario, one jurisdiction is higher: Hawaii, at $5,821 under a Melson formula, a design shared only with Delaware and Montana among the fifty, and Hawaii sits well below Massachusetts on equal parenting. Massachusetts's $4,714 is about 5% above the next, Wisconsin at $4,492. Two conventions differ between the passes, on the parents' health premiums and on the tax treatment of net-income states. Attachment D measures both, and the Wisconsin margin, the closest in the ranking, should be read with that in mind.

Three qualifications, and I would rather state them than leave them to the reader. This is one fact pattern at one income level; it does not control for cost of living, and the Task Force's own consultant has justified higher Massachusetts amounts on that ground. Most of the fifty figures were produced by analysts who rated their own confidence as moderate, usually because a schedule had to be interpolated, and while each was checked by an adversarial pass, none was checked to the standard of the Massachusetts control. And these are presumptive guideline amounts, not outcomes. Several jurisdictions reach equal-parenting results through discretionary deviation rather than formula, and those outcomes may be materially lower.

One comparison does not depend on any ranking. Massachusetts's worksheet does not count overnights. It selects among three categorical boxes, and approximately one-third parenting time falls inside the box the Guidelines treat as ordinary primary custody with no adjustment. Twenty-eight of the fifty-one jurisdictions surveyed apply some formula-based reduction at that time split; Massachusetts is one of the twenty-three that do not. I draw no conclusion about the size of that effect. Among the five rows that met the strictest verification tier, the increase from equal time to one-third time runs from nothing in New Jersey to about 75% in Delaware, with Massachusetts, the one row without a credit, second lowest at about 7%. The presence of a credit does not order those five. I note only that the categorical design is the minority approach.

The 2025 Task Force declined to add parenting-time boxes to the Worksheet and created the Section II.D.4 deviation pathway instead. I am not asking it to revisit that. The first change below alters the wording of an existing line and adds nothing. The second adds one computed sub-line, which I recognise is a change to the form, though it asks nothing of either party that the Worksheet does not already collect. The third would require a parenting-time field, and I raise it without pressing it.

Section referenced: Guidelines Worksheet Lines 6d–6e and 7a–7b.

Suggested language (Worksheet Line 6e, replacing the present instruction as it applies where Box 1 is checked):

> "**Where Box 1 is checked, enter the amount from Line 6c. The limitation described at Line 6e shall be applied once, at Lines 7a and 7b, to the netted amount at Line 6g, in the same manner as where Box 2 is checked.**"

Box 3 follows the same path on the form, so the same reversal must occur there. I have not modelled it, Section 5.1 below finds a defect under Box 3 that runs in the opposite direction, and I would rather raise the question than extend a change I have not checked.

Reasons. Line 6e limits a parent's figure by reference to the other parent's income. The Guidelines do not state the line's purpose, so what follows is an inference from what it does rather than a reading of any Commentary. Where the figure limited is an obligation, as it is under Box 2, the limitation holds down what a parent can be ordered to pay relative to what the other parent devotes of her own income, which operates in the payor's favour. Where it is a credit, as it is for the payor under Box 1, the same limitation reduces what he is allowed for having the children half the time, and it reduces it most where the income gap is widest. Applying it once to the netted transfer preserves the protection and removes the reversal. It requires no new information from either party.

Section referenced: Guidelines Worksheet Line 5b; Section II.D.

Suggested language (Worksheet, new Line 5b-1):

> "**5b-1. Where Box 1 is checked, multiply Line 5b by 0.75 and enter the result. Where Box 2 or Box 3 is checked, enter the amount from Line 5b.**"

Reasons. Box 1 charges each household in full for every child, which is a cross-credit with a duplication factor of 2.0. The factor of 1.5 that Indiana's commission derived, halved by the equal time Box 1 already describes, is the 0.75 above. The Task Force need not adopt Indiana's figure. What I am asking is that the factor be a number the Guidelines have chosen and can explain, rather than one that falls out of an entry convention at Lines 1d to 1f. If the Task Force concludes 2.0 is right, saying so in the Commentary would answer this section.

Not proposed, recorded for completeness. Replacing the 0.75 with 1.5 multiplied by the other parent's share of overnights would give the same result at equal time and would also dispose of the region between one third and one half that Section II.D.4 now sends to a judge. It needs a parenting-time field on the Worksheet, which the 2025 Task Force declined to add, so it is not one of the suggestions in these comments.

These change amounts, and I would rather say so than present them as neutral. At the worked example the first reduces the weekly order from $1,013 to $935, a change of 7.7%, and the second to $701, a change of 30.8%. Line 7e falls from 26.5% to 24.5% and then to 18.3%. Against a Box 2 order of $1,088, the credit for equal parenting goes from 6.9% to 14.0% and then to 35.5%, It also stops collapsing as the incomes diverge. Over a payor income share running from 61% to 95%, the credit as the Worksheet now computes it falls from 64.5% to 1.3%; under this change it runs from 73.4% to 26.3%.

Two things about the scope of these figures. Every number above holds child care at zero, so I ran the same comparison with it present: at $300 per week of claimed child care the first change moves the order from $1,276 to $1,198 and the second to $964, and the credit for equal parenting falls from 14.0% to 11.3% and from 35.5% to 28.6%. The direction holds and the size shrinks, because child care enters Line 6c and is allocated on income share regardless of the box, which is the subject of Section 2. And I checked the mirror case, in which the lower earner would be the payor: no change proposed here alters which parent pays, at any income split I tested.

If the Task Force adopts neither, two smaller things would still help. The Commentary could say plainly what the Box 1 adjustment is:

> **"The adjustment produced by checking Box 1 rather than Box 2 in Line 1b is a function of the parents' relative shares of combined available income. Where one parent's share of combined available income is substantially larger, the adjustment for approximately equal parenting time will be correspondingly smaller. In providing that both parents' columns carry every child, the Worksheet treats each household as bearing the children's costs in full, and the Worksheet does not separately measure the additional costs a parent incurs in providing a residence for the children for a greater share of the time. Where those costs are material, Section IV.B may apply."**

And the Worksheet could display both the Box 1 and the Box 2 amounts. Section II.D.4 asks a judge to decide whether the categorical result is appropriate for a family between one third and one half. How is that judgment to be made without knowing what the categorical result was worth, when on the figures above it may be 1.3% or it may be 77.6%? Showing both changes no amount and adds one computed line.

Suggested Worksheet language:

> **"7f. If you checked Box 1 or Box 3 in 1b, enter the amount that would result at 7d if you had checked Box 2."**

5.1 Under Box 3, splitting the children lowers the order while raising the cost

Section referenced: Guidelines Worksheet Lines 1b (Box 3), 1d–1f, 3f and 6g; Section II.D.

Table B exists to capture economies of scale. Two children do not cost twice one child, so the factor is 1.40 rather than 2.00. Where the children are divided between the parents under Box 3, those economies are gone. Each household incurs the cost of a first child, and the two columns together generate a combined factor of 2.00. The arrangement is more expensive in total.

Line 6g nets the two columns against each other, and the net is computed on the one-child schedule. So the more expensive arrangement produces the smaller transfer.

Arrangement (two children)	Payor's share of the children's care	Order
Box 1 — shared equally, both children	2 × 50% = **1.0 child-share**	**$835/wk**
Box 3 — one child residing with each parent	1 × 100% = **1.0 child-share**	**$581/wk**

That is $13,203 a year on identical care responsibility. The netting also treats the lower earner's column obligation as though it were payable. Parent A's nominal obligation is small, since Parent A earns $570 a week and holds a 12.32% share, and it is set off in full. Line 5c's low-income protection does not reach Parent A either, because it engages only where the other parent's Line 3a is $391 or less, and Parent A's is $537.

This point does not favour payors. It cuts against whichever parent has the lower income.

Suggested language (Commentary to Section II.D, added):

> "**Where the children are divided between the parents under Box 3, each household incurs the cost of a first child, and the combined Table B factors applied across the two columns will exceed the factor that would apply were the children in one household. The netting at Line 6g does not account for this. Where a split arrangement leaves either household with materially less than it would receive were the same children in a single household, Section IV.B may apply.**"

This is a correctness point about one provision, not a claim about typical outcomes; I have no figure for how often Box 3 is used. There is a contrary view, and I acknowledge it: in a split each parent directly bears their own child's costs, so less needs to transfer. My point is not that netting is wrong in principle. It is that the netting is computed on a schedule that assumes economies of scale the arrangement has eliminated.

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6. Two recommendations already before the Task Force deserve adoption

Sections referenced: Guidelines Worksheet; Findings and Determinations form CJ-D 305.

In its December 2024 submission, the Mass Family Advocacy Coalition recommended, as its Recommendations 4 and 5, a mandatory financial disclosure checklist attached to the Guidelines Worksheet, completed and signed by each party under the penalties of perjury; and relocating the deviation section from the Findings form onto the Worksheet, together with better deviation data.

I support both.

I come to these from a different position than their authors, and I do not adopt their characterisation of the parties who create disclosure problems. That disagreement does not touch the merits, because both are symmetric instruments. A disclosure checklist signed by each party under the penalties of perjury protects a recipient against an understated income and a payor against an overstated expense. Neither party benefits from inaccurate inputs. The child benefits from neither.

On deviation data, the Economic Review reports that among cases with deviations, no reason was recorded in 14%, even though Section IV.A requires four specific written findings and CJ-D 305 supplies a checklist. It reports that 50% of deviations came from negotiated agreements, and that the headline 26% figure is a composite of deviations, imputed income, attributed income and defaults. The rate of deviation on its own is not published. Neither is the rate at which a contested request for deviation succeeds.

Those two numbers bear directly on whether the presumption established by G.L. c. 208 § 28 and 42 U.S.C. § 667(b)(2) operates as a rebuttable presumption in practice. Recommendation 5 would produce them. I suggest it be adopted for that reason, in addition to the reasons its authors gave.

Suggested language. I supply no redline of my own here. The language already before the Task Force is adequate, and adopting it as proposed avoids introducing unvetted terms. I ask that both be adopted substantially as submitted in December 2024:

> **Recommendation 4.** "Add a disclosure checklist to the Guidelines Worksheet for each party to complete and sign under the penalty of perjury."
>
> **Recommendation 5.** "Collect more deviation data and include a deviations section in the Guidelines Worksheet." In full: "Replace the Deviation section in the Findings form with a new Deviation section in the Guidelines Worksheet. ... [M]ore data is needed to further analyze these changes to presumptive child support calculations."

Both are quoted from the brief as submitted. One addition is mine and not MFAC's: that the data collected under Recommendation 5 be sufficient to report the rate of deviation separately from imputed income, attributed income and default, which the Economic Review's 26% composite figure does not.

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7. The Guidelines have been amended between review cycles before

The 2025 Guidelines took effect December 1, 2025, and the next quadrennial review is not due until about 2029. No public comment period is open. These comments are offered as correspondence, not as a filing.

I am sending them now rather than holding them for the next cycle because the Guidelines have twice been amended between quadrennial reviews. In June 2018 the Trial Court reviewed two issues on which it had received questions and revised the Worksheet's age-adjustment factors to eliminate outcomes it called "counterintuitive." That was a change to worksheet mechanics, made outside a review cycle, prompted by questions about how the form behaved. A further Commentary revision took effect in 2023.

Each suggestion above is of the same kind. It is confined to the mechanics of a provision or a worksheet line, and it could be adopted on the same basis. Three change a support amount and say so where they appear; the rest change none. If the Court would rather hold them for the 2029 review, they are offered with that in mind.

Attachments

- A. Method: how after-tax positions were computed, the constants used, and sensitivity analysis. File: ATTACHMENT-A-method (PDF and Markdown).
- B. Reproducible model and test suite. Folder: attachment-B-model. worksheet.py reproduces CJ-D 304 line by line; test_worksheet.py (60 checks) pins it against a real order and against the form's own calculation scripts; test_guidelines.py (20 checks) covers the Table A reconstruction; box1_fix.py and test_box1_fix.py (258 checks) produce Section 5's figures;

childcare_post_transfer.py and test_childcare_post_transfer.py (10 checks) produce Section 2's redline figures; submission_figures.py regenerates every other figure quoted above. Printed outputs are included as submission-figures-run-2026-09-05.txt, box1-fix-run-2026-09-05.txt and childcare-post-transfer-run-2026-09-05.txt.

- C. Worksheet reproduction and its validation. Folder: attachment-C-chart. The Table A schedule transcribed from CJ-D 304 page 4 was cross-checked against every one of the 1,104 rows published in the Guidelines Chart (guidelines-chart.json), with no disagreement greater than $1. The check is the first test in test_guidelines.py.
- D. Fifty-one-jurisdiction comparison at this fact pattern, with the verification status of every row and the method by which each was computed, reconciled and checked. Folder: attachment-D-fifty-one. Report: ATTACHMENT-D-fifty-one-jurisdiction-comparison (PDF and Markdown); per-row data final-rows-2026-09-03.json.

Attachment A — Method, assumptions, and sensitivity

Accompanying: Comments on the Massachusetts Child Support Guidelines and Guidelines Worksheet **Date:** 3 September 2026 **Reproducible source and tests:** Attachment B

This attachment states how I produced every figure in the comments, what I took from primary sources, what I assumed, and how far the conclusions move when an assumption changes. A reader who disagrees with a conclusion should be able to find the exact line where the disagreement starts.

1. Sources

All primary material is published by the Commonwealth.

Source	Use
2025 Child Support Guidelines, effective 1 December 2025	Section text and Commentary
Child Support Guidelines Worksheet, CJ-D 304 (12/01/2025)	The line-by-line arithmetic, transcribed
2025 Child Support Guidelines Chart	Independent check of Table A (§ 2)
Report of the Task Force for the 2024–2025 Quadrennial Review, 30 June 2025	Structure, recommendations
Economic Review of the Massachusetts Child Support Guidelines 2024–2025, The Brattle Group	Deviation data, benchmark states, gross and net income discussion
Findings and Determinations form CJ-D 305 (12/1/25)	Deviation grounds as presented to the Court

An earlier draft of this analysis was written before I had CJ-D 304 and inferred the Worksheet's order of operations. The form arrived on 2 September 2026. Every figure in the comments was recomputed from the transcribed form, and one earlier conclusion, that § IV.C does not measure child care, proved wrong and was withdrawn. Nothing below rests on the inferred version.

2. Table A, and how it was checked

CJ-D 304 page 4 prints Table A as eight tranches of combined available income: $15 up to $301; 20% of the excess to $391; 22% to $1,000; $220 plus 21% to $1,600; $346 plus 18% to $2,400; $490 plus 14% to $3,500; $644 plus 11% to $5,000; and $809 plus 10% to $8,654. I transcribed that schedule and then tested it against the Guidelines Chart, which publishes the one-child weekly amount at every level of combined available income.

That Chart contains 1,104 rows from $0 to $8,654 a week. The test suite in Attachment B confirms that every row reproduces from the transcribed schedule with no disagreement greater than $1, that support never falls as income rises, that the top row of $8,654 a week annualises to $450,008 and so matches the $450,000 maximum in Section II.C.2, that the $0 row returns the $15 minimum, and that the Chart's own instruction to use the lower amount when income falls between two rows is honoured. Table B is quoted, not reconstructed. Commentary 2021 to Section II.L gives 1.4 for two children, 1.68 for three, 1.85 for four and 1.94 for five.

3. The Worksheet chain

worksheet.py in Attachment B implements CJ-D 304 line by line. The lines the comments rely on:

Line	Operation
3a	Available income = 2a + 2c − 2d − 2e − 2f, floored at $0. No tax adjustment of any kind.
3c	Each parent's share of combined available income
3d	Applicable income, the lesser of 3b and $8,654
3e to 3g	Table A on 3d, times Table B for the number of children in that column
4a to 4c	Table C age adjustment, keyed per column
5a to 5c	Proportional shares, with the low-income payor adjustment at 5c

Line	Operation
6a and 6b	Child care, capped at $430 a child, allocated on the other parent's 3c
6c	5c + 6b. Child care enters the order here.
6d to 6g	Income-disparity adjustment. 6g = Recipient 6e − Payor 6e.
7a to 7d	Recipient-side disparity adjustment. 7d is the presumptive order.
7e	7d ÷ Payor 3a. At 40% or more the substantial-hardship box is checked.

Fifty-five automated checks in test_worksheet.py pin the chain, and two of them reproduce the amounts of a real Massachusetts order. Two things are not modelled: the Commentary's combined child-support-and-child-care test for parties who keep child care off the Worksheet, and the discretionary band above $450,000.

Rounding. CJ-D 304 says to round every line to the nearest whole dollar or percentage, and the model carries cents by default so each step can be traced. Setting `round_lines=True` reproduces the form's rounding, which on the worked example gives $1,016 a week rather than $1,012.73, almost entirely because Line 3c rounds 87.68% to 88%. The blank 2025 form published on mass.gov carries its own calculation scripts, and they do exactly that. Line 3c is fixed at two decimal places and every dollar line is rounded. Executed in a harness (`model/official_xfa_harness.js`), the form's own scripts return the model's rounded figure in all six scenarios the comments quote, $1,016 a week for the worked example, and the run is saved as `output/2026-09-05-official-xfa-vs-model.txt`. Across the three scenarios the difference runs against the payor by $3 to $4 a week. A reader who works the form by hand should expect the rounded figure, and no conclusion in the comments depends on the difference.

4. The after-tax computation

Support is neither deductible to the payor nor taxable to the recipient. To compare what each household has left to spend, net_position.py computes for each of them federal income tax, Social Security and Medicare including the additional Medicare tax, Massachusetts income tax, and the refundable credits available to the parent claiming the children.

Federal constants for tax year 2026: standard deduction $16,100 single and $24,150 head of household; Social Security wage base $184,500; Child Tax Credit $2,200 a child with $1,700 refundable, subject to the earned-income limit in IRC § 24(d); Earned Income Tax Credit maximum $8,231 for three children, phasing out from $23,890 to $62,974. Massachusetts constants: rate 5%; personal exemption $4,400 single and $6,800 head of household; dependent exemption $1,000; state EITC at 40% of the federal credit; Child and Family Tax Credit $440 for each dependent under 13. All were checked against Commonwealth or IRS publications on 2 September 2026, and a separate blind re-implementation from IRS Rev. Proc. 2025-32 (Attachment D, § 2) reproduced the two effective rates to within a tenth of a point.

Where the model simplifies, it does so against the point the comments make. The Massachusetts child care expense deduction is not modelled; including it would improve the recipient household's position further in every child-care scenario.

5. The figures used in the comments, and their sensitivity

submission_figures.py prints every figure below. None is asserted in prose only. The parameters are those of the author's own order, as the comments say in § 1: payor $201,000 a year with a $43 weekly health premium, recipient $570 a week with $33, three children aged 5, 8 and 14, Box 1.

Figure	Value	Basis
Presumptive order, no child care	$1,013/wk ($52,662/yr)	worksheet.py
Presumptive order, $300/wk child care claimed	$1,276/wk ($66,340/yr)	worksheet.py

Figure	Value	Basis
Line 7e at $300/wk child care	33.4%	Worksheet Line 7e
The same order as a share of payor after-tax income	47.4%	net_position.py
Child care at which Line 7e first reaches 40%	$589/wk (about $196 a child)	Solved by bisection
Payor's true burden at that point, as a share of after-tax income	56.9%	The 17-point lag
Payor effective tax rate	+30.4%	§ 4 constants
Recipient effective tax rate	−38.9%	§ 4 constants, two children under 13
Payor's Line 3c share, and so his share of any claimed child care	87.68%	Worksheet Line 6b
Reduction for equal shared parenting at that income ratio	6.9% ($3,909/yr)	Box 1 against Box 2
The same reduction at a 56.3% payor income share	77.6%	The sweep in § 5 of the comments
Box 1 against Box 3, two children, identical care responsibility	$835/wk against $581/wk	§ 5.1 of the comments
The equal-parenting credit, expressed as the payor's own Line 6e	$75.17/wk	§ 5; `model/box1_fix.py`
Cross-credit duplication factor implied by Box 1	2.00	§ 5; Indiana's commission derives 1.5
Equal parenting priced as a share of overnights, against 1.5	33.3%	§ 5; 46.9% against 2.0
Order under the Line 6e redline / the Line 5b-1 redline	$935.06 / $701.30 per week	§ 5; from $1,012.73
Each parent separately pays $300/wk of child care	Payor bears $29,008 of $31,200, 93%	Assumption, stated in the comments: combined spending doubles under equal parenting

| Child care allocated on shares adjusted by the base order (§ 2 redline, new Line 6b-1) | payor share 87.7% → 64.5%; order $1,276 → $1,206/wk, $3,624/yr | **Definition**, not assumption: Line 3a moved by the no-child-care Line 7d, Payor/Recipient as Line 6f would designate in that case, over Line 3b. On after-tax resources the share is 48.2%; the comments do not ask for that. `model/childcare_post_transfer.py`, pinned by its test file. | One sensitivity matters enough to show. Because the Massachusetts Child and Family Tax Credit stops at age 13, the recipient's effective rate depends on how many children are under that age: −40.3% with all three, −38.9% with two (the case here), −37.4% with one, −35.9% with none. Across that whole range the spread between the two households moves by less than five points.

6. Limits I want stated plainly

Per person rather than per household, the payor keeps more than any individual member of the recipient household: $87,172 for one against $23,455 each for four in the no-child-care case. Households are compared because Sections IV.C and IV.B.13 are themselves household-level and payor-level provisions, but the per-person figure belongs in view.

The $430-a-child benchmark is a ceiling, which the Task Force set from data on the average cost of infant care in Massachusetts, not a typical claim. At three children it is $1,290 a week. So the comments lead with the $589 a week at which Line 7e first reaches 40%, not with the ceiling, and the household inversion appears with no child care at all: $93,821 against $87,172.

One income pair is not a distribution. I do not know how often claimed child care approaches the benchmark. The Commonwealth is better placed to answer that, which is one reason the comments support the recommendation for better data collection.

The assumption that combined child care doubles under equal parenting is mine, and the 93% figure scales down proportionately if spending is lower. The Guidelines collect no data on it.

7. Reproduction

Attachment B contains the source, the parsed Chart data and the test suite. The suite runs in under a second on a standard Python installation, and the Table A check can be run against the published Chart independently of everything else in this submission. If a line of the transcription is wrong, I would like to be told, and I will revise.

Attachment D — Fifty-one-jurisdiction comparison at one fact pattern

Accompanying: Comments on the Massachusetts Child Support Guidelines and Guidelines Worksheet **Date:** 3 September 2026 **Per-row data:** final-rows-2026-09-03.json (this folder)

This attachment shows how I produced the cross-state figures in section 5 of the comments, which rows I used, which I excluded and why, and the full table for all fifty states and the District of Columbia. Any single row can be checked against the source that row names.

1. The fact pattern

Parent B earns $201,000 a year gross ($16,750.00 a month, $3,865.38 a week) and pays a $43 weekly health premium. Parent A earns $570 a week gross ($29,640 a year, $2,470.00 a month) and pays a $33 weekly health premium. Combined income is $230,640 a year, $19,220.00 a month, $4,435.38 a week. Three children, aged 5, 8 and 14. Wage income only, no other support orders.

S1 is equal shared parenting, 182 and 183 overnights. S2 is Parent A primary with Parent B at 122 overnights a year (33.4%), applying each state's own rule to that count rather than assuming S2 is the no-credit case. S3 is S2 plus $300 a week ($15,600 a year) of work-related child care for the two younger children. Weekly figures convert to monthly at 52 ÷ 12 before rounding, and monthly figures are reported to the cent.

2. Method

Every jurisdiction went through the same four stages, with no special handling for Massachusetts. Each stage was carried out by a separate AI language-model analyst working from the primary sources named in the row, under written instructions, and without access to the other analysts' output. I designed the stages, set the fact pattern, ran the control described below, and checked the figures the comments quote against the per-row data file. The table names the source for every row so that any reader can repeat the check without relying on either the analysts or me.

1. Profile. One analysis read the jurisdiction's own statute, court rule, schedule and worksheet and recorded the model (income shares, percentage of obligor income, Melson, or other), the income basis, the schedule unit, whether the schedule reaches this income, the shared-parenting rule and the treatment of work-related child care, citing a source for each.
2. Two blind computations. Two further analyses each computed S1, S2 and S3 from that profile without seeing the other's work.
3. Reconciliation. Where the two disagreed, a third analysis adjudicated from the sources and recorded why they had disagreed.
4. Attack. A final analysis tried to break the profile by finding a misread rule, a schedule read in the wrong unit, a cap not applied or a credit not credited. Where it found a defect that changes the result and could supply a corrected figure, I use the corrected figure and mark the row CORRECTED. Where it found such a defect and could not supply a figure, I mark the row DISPUTED.

Massachusetts ran blind through the same pipeline as a control, and it reproduced the Worksheet model in Attachment B to within a dollar at every scenario. The blind run returned $4,388.48, $4,714.22 and $5,854.09 a month against the model's $4,389, $4,714 and $5,854. A separate blind re-implementation of the tax position, working from IRS Rev. Proc. 2025-32 and the Massachusetts statute, returned effective rates of +30.43% for the payor and −38.86% for the recipient. Attachment A reports +30.4% and −38.9%. On 5 September 2026 Texas and Georgia, recomputed blind from their own documents, reproduced their rows exactly, and Massachusetts, run blind through the form's own rounding, returned the rounded figures Attachment A reports.

3. Which rows the comments use

The comments rank only rows that survived every stage. That means the two blind computations agreed or were adjudicated, and the attack found nothing that changes the result. Thirty-six rows carry that flag. I set six of them aside before ranking.

- Kansas and New York exceed their own schedule's income cap at this fact pattern. New York's cap is $193,000 a year against $230,640 combined. Above the cap each guideline commits the amount to the judge's discretion, so no presumptive figure exists to report.
- Georgia and Nebraska are internally inconsistent. Georgia's S2 is below its S1, and Nebraska's S2 could not be computed.
- Alabama and California each carry a defect the attack marked as changing the result, with no corrected figure supplied. The survived flag on those two rows contradicts the attack's own text, so the DISPUTED classification in the table governs.

That left thirty rows after the first pass. On 4 September 2026 I ran two further passes over the twenty-one that had not survived. In the first, one analyst repaired each computation from the defects the adversary had named, a second computed the state from scratch without seeing the repair, a third adjudicated any disagreement, and a fresh adversary attacked the settled figure. Five survived that attack, and two more that the attack corrected were confirmed by a further independent recomputation. In the second pass I downloaded each remaining state's own guidelines, schedule, worksheet and conversion table from official sites, and ran the same four stages against those documents rather than the web. Ten settled there, and on 5 September a third reading of the single disputed line settled Colorado, Hawaii and South Dakota, and a reading of Iowa's medical support rule settled Iowa; I hold Georgia out. Every analysis in every pass was an AI language model working under written instructions; each document read is named in the data files in this folder, and a manifest lists every document downloaded.

The comparison therefore uses **fifty** rows. Kansas, New York and Oklahoma are reported as the mandatory amounts at their caps of $18,000 a month, $193,000 a year and $15,000 a month, and labelled cap-bound wherever they appear. Oklahoma also depends on one fact I have fixed by decision: the three children are insured, so its cash medical support line is not invoked; the source of that coverage is not part of the fact pattern and neither parent's stated premium is treated as covering them, which is how the Massachusetts worksheet treats those premiums too. Section 6 lists the twenty additions and the one row held out, with the reason for each. Georgia is held out although five analyses agree on its figure: the state's newly enacted parenting-time formula, read literally, gives a lower order at one-third time than at equal time. The worked example in the Commission's calculator user guide (Figures 79 and 80, $112.73 at 150 noncustodial days on a $390 obligation) reproduces the literal formula to the cent, so the state's calculator does produce this result. I still would rather not rank a result that the statute's own explanatory text seems not to intend.

Among the fifty Massachusetts produces the highest S1, $4,388 a month. New York's cap-bound $4,068 is next, and New Hampshire at $3,839 is the next highest state whose schedule reaches this income; Massachusetts exceeds it by about 14%. On S2 Hawaii is higher, at $5,821 under its Melson formula; Massachusetts's $4,714 is second, about 5% above Wisconsin at $4,492. Georgia, held out, falls well below Massachusetts on both scenarios.

A stricter tier requires, in addition, that both the profile and the calculation were self-rated high confidence. Five rows meet it: Delaware, Massachusetts, New Jersey, Vermont and Virginia. Massachusetts is first on S1 (46% above New Jersey) and on S2 (18% above Delaware) among those five as well. The gap between the two tiers is almost entirely analysts rating an interpolated schedule "medium" rather than any identified defect. That is why the comments use the fifty-row tier and say so.

Of the fifty-one jurisdictions, twenty-eight apply some formula-based reduction in support at 122 overnights a year and twenty-three apply none (`credit-at-122-2026-09-05.json`, produced by `tools/credit_at_122_tally.py`, which records the one reclassification, South Dakota, and its basis). I count Massachusetts among the twenty-three because its Worksheet takes a categorical input, and approximately one third of parenting time is Box 2, the base case, not a credit applied to a higher default. I draw no conclusion about the dollar effect of that difference. Among the five strict-tier rows the proportional increase from S1 to S2 is New Jersey 0%, Massachusetts 7.4%, Virginia 42.7%, Vermont 53.8% and Delaware 74.9%. Four of the five give a credit at 122 overnights and Massachusetts does not. The presence of a credit does not order them, and the Massachusetts-against-Delaware pairing on its own would have suggested the opposite of intuition.

4. Qualifications

This is one fact pattern at one income level. I have applied no cost-of-living adjustment, and the Task Force's own consultant has justified higher Massachusetts amounts on that ground. Every other jurisdiction's profile was assembled once in this exercise, while Massachusetts's has been checked against the form itself, so the pipeline's behaviour on Massachusetts is a reasonable proxy for its behaviour elsewhere and not a guarantee. And these are presumptive guideline amounts. They say nothing about what any court ordered.

Two conventions differ between the passes, each worth a few percent. The first pass told analysts the $43 and $33 premiums covered the children. The second, following the Massachusetts worksheet, treated them as each parent's own cost and the children as insured from an unstated source. Recomputing Delaware blind both ways on 5 September 2026 moved its figures by 1.3% to 2.8%, and under the first-pass convention it reproduced the row used here to the cent. Where a state works in net income and publishes no conversion table, analysts were given approximate effective tax rates with the lower earner's refundable credits left out. A blind recomputation of Michigan and Florida that netted those credits lowered their orders by 10% and 14%. Under the original convention they returned to within 1% and 3% of the rows used here. Netting a lower earner's refundable credits reduces a net-income state's order, so that convention runs against the comparison's conclusion wherever it applies. The 14% margin over New Hampshire on S1 clears the largest effect measured. The 5% margin over Wisconsin on S2 is the closest in the ranking, and although it exceeds the 2.8% measured on Delaware, one measurement on one state is not a noise band. Read it with more caution than the rest. The files are in `spot-check-2026-09-05/`.

5. The table (all 51), first pass

Dollar figures are monthly. Where the attack supplied a corrected value I use it. A ∗ marks a cell where the attack's corrected array left that scenario without a usable figure. DISPUTED and DISCRETIONARY rows show the as-computed blind figures for the record and are not ranked or cited. "Status" is the classification described in section 2, as it stood after the first pass. The fifty-row tier used in the comments is defined in section 3, and section 6 records what the second pass changed. The Reaches column records the first-pass profile's reading; Oklahoma's read Y although its cap binds at this income, which section 6 records as cap-bound.

State	Status	Model	Income basis	Schedule unit	Reaches income	S1 (mo)	S2 (mo)	S3 (mo)	Credit at 122 O/N
Alabama	DISPUTED, see § 6	income shares	gross	per family	Y	1,846.00	2,836.00	3,967.00	N
Alaska	LOW-CONFIDENCE	percentage of obligor income	net	percentage	N	2,367.95	3,462.96	3,624.80	Y
Arizona	CORRECTED, see § 6	income shares	gross	per family	Y	1,339.00	2,320.00	3,453.00	Y
Arkansas	LOW-CONFIDENCE	income shares	gross	per family	Y	2,118.68	2,349.64	3,482.57	N
California	DISPUTED, see § 6	other	net	other	Y	3,009.80	3,935.27	4,964.66	Y

State	Status	Model	Income basis	Schedule unit	Reaches income	S1 (mo)	S2 (mo)	S3 (mo)	Credit at 122 O/N
Colorado	CORRECTED, see § 6	income shares	adjusted gross	per family	Y	—*	—*	3,406.99	Y
Connecticut	LOW-CONFIDENCE	income shares	net	per family	Y	3,138.20	3,138.20	3,944.20	N
Delaware	**VERIFIED**	Melson	net	other	Y	2,281.35	3,990.73	4,989.26	Y
District of Columbia	LOW-CONFIDENCE	income shares	adjusted gross	per family	Y	2,253.73	3,467.96	4,600.90	N
Florida	LOW-CONFIDENCE	income shares	net	per family	Y	1,735.21	2,512.99	3,612.62	Y
Georgia	LOW-CONFIDENCE, see § 6	income shares	gross	per family	Y	1,783.68	610.75	1,743.68	Y
Hawaii	CORRECTED, see § 6	Melson	net	other	Y	2,763.00	5,799.00	6,681.00	N
Idaho	LOW-CONFIDENCE	income shares	gross	per family	Y	1,794.22	2,549.85	3,682.79	Y
Illinois	CORRECTED, see § 6	income shares	net	per family	Y	—*	—*	4,120.69	N
Indiana	LOW-CONFIDENCE	income shares	gross	per family	Y	2,283.25	2,548.03	3,680.96	Y
Iowa	CORRECTED, see § 6	income shares	net	per family	Y	1,943.88	3,111.16	4,152.38	N
Kansas	**DISCRETIONARY**, see § 6	income shares	gross	per child	N	2,494.99†	4,101.95†	5,234.88†	N
Kentucky	LOW-CONFIDENCE	income shares	gross	per family	Y	1,087.80	1,871.67	3,004.60	Y
Louisiana	LOW-CONFIDENCE	income shares	adjusted gross	per family	Y	2,227.23	3,269.06	4,284.34	N
Maine	LOW-CONFIDENCE	income shares	gross	per child	Y	2,899.02	2,899.02	4,031.96	N
Maryland	LOW-CONFIDENCE	income shares	gross	per family	Y	2,309.54	3,295.11	4,428.05	Y
Massachusetts	**VERIFIED**	income shares	gross	other	Y	4,388.48	4,714.22	5,854.09	N
Michigan	LOW-CONFIDENCE	income shares	net	per family	Y	1,445.25	2,808.44	3,908.11	Y
Minnesota	LOW-CONFIDENCE	income shares	gross	per family	Y	1,174.71	2,271.30	3,403.47	Y
Mississippi	LOW-CONFIDENCE	percentage of obligor income	adjusted gross (obligor only)	percentage	Y	2,097.44	2,564.76	2,564.76	N
Missouri	LOW-CONFIDENCE	income shares	gross	per family	Y	3,139.00	3,139.00	4,153.00	Y
Montana	CORRECTED, see § 6	Melson	net	other	Y	1,730.87	3,270.12	4,112.54	Y
Nebraska	LOW-CONFIDENCE, see § 6	income shares	net	per family	Y	1,572.00	—‡	—‡	N
Nevada	LOW-CONFIDENCE	percentage of obligor income	gross	percentage	Y	1,842.80	2,485.00	2,485.00	N
New Hampshire	DISPUTED, see § 6	hybrid	net	per family	Y	—	3,818.00	4,100.00	N

State	Status	Model	Income basis	Schedule unit	Reaches income	S1 (mo)	S2 (mo)	S3 (mo)	Credit at 122 O/N
New Jersey	**VERIFIED**	income shares	net	per family	Y	3,002.31	3,002.31	3,406.43	Y
New Mexico	LOW-CONFIDENCE	income shares	gross	per family	Y	1,823.64	2,795.32	3,928.25	N
New York	**DISCRETIONARY**, see § 6	other	gross	percentage	N	—	—	—	N
North Carolina	CORRECTED, see § 6	income shares	gross	per family	Y	1,976.88	—*	—*	N
North Dakota	LOW-CONFIDENCE	percentage of obligor income	net	other	Y	2,939.00	3,219.00	3,219.00	Y
Ohio	CORRECTED, see § 6	income shares	gross	per family	Y	2,441.85	2,441.85	3,581.69	Y
Oklahoma	CORRECTED, see § 6	income shares	adjusted gross	per family	Y	1,385.10	2,109.46	3,242.39	Y
Oregon	LOW-CONFIDENCE	income shares	gross	per family	Y	1,072.00	1,772.00	2,905.00	Y
Pennsylvania	LOW-CONFIDENCE	income shares	net	per family	Y	2,378.42	3,086.76	4,071.81	N
Rhode Island	LOW-CONFIDENCE	income shares	gross (functionally)	per family	Y	2,684.45	3,123.22	4,068.43	N
South Carolina	LOW-CONFIDENCE	income shares	gross	per family	Y	1,832.22	2,669.21	3,684.50	Y
South Dakota	CORRECTED, see § 6	income shares	net	per family	Y	1,876.20	2,472.50	2,472.50	Y
Tennessee	LOW-CONFIDENCE	income shares	adjusted gross	per family	Y	1,833.00	2,031.00	3,164.00	Y
Texas	LOW-CONFIDENCE	percentage of obligor income	net (obligor only)	percentage	N	3,510.00	3,510.00	3,510.00	N
Utah	CORRECTED, see § 6	income shares	gross	per family	Y	1,036.65	2,311.00	2,961.00	Y
Vermont	**VERIFIED**	income shares	other (available income)	per family	Y	1,686.42	2,594.42	3,644.63	Y
Virginia	**VERIFIED**	income shares	gross	per family	Y	1,872.18	2,672.09	3,805.02	Y
Washington	LOW-CONFIDENCE	income shares	net	per child	Y	2,819.56	2,819.56	3,919.20	N
West Virginia	CORRECTED, see § 6	income shares	gross	per family	Y	1,818.56	—*	—*	N
Wisconsin	CORRECTED, see § 6	percentage of obligor income	gross	percentage	Y	—*	3,652.87	4,087.39	Y
Wyoming	DISPUTED, see § 6	income shares	net	per family	Y	1,917.95	2,803.78	2,803.78	Y

6. The reworking passes, 4 and 5 September 2026

Twenty rows were added.

State	S1 (mo)	S2 (mo)	S3 (mo)	How it was settled
Alabama	1,746.00	2,736.00	3,698.00	second rework from local documents, survived the attack

State	S1 (mo)	S2 (mo)	S3 (mo)	How it was settled
Arizona	1,309.36	2,290.06	3,422.99	second rework from local documents, survived the attack
California	2,424.32	3,436.04	4,355.33	first rework, survived the attack (figures as corrected by the attack)
Colorado	2,652.32	3,090.30	4,040.22	second rework; one disputed line settled by a third reading of the document
Hawaii	2,774.00	5,821.00	6,713.00	second rework; one disputed line settled by a third reading of the document
Illinois	1,881.45	3,037.90	4,103.12	second rework from local documents, survived the attack
Iowa	2,630.25	3,744.73	4,764.86	second rework; cash medical support ordered by default under Rule 9.12(3)(a), three readings agree
Kansas	2,296.63	3,838.03	4,696.45	second rework from local documents, survived the attack (cap-bound)
Montana	1,461.00	3,073.50	3,790.83	first rework, survived the attack
Nebraska	1,475.23	2,402.03	3,499.66	first rework, survived the attack
New Hampshire	3,838.66	3,838.66	4,117.14	first rework, corrected by the attack then confirmed independently
New York	4,067.61	4,067.61	5,201.33	first rework, survived the attack (cap-bound)
North Carolina	1,883.12	2,934.30	4,067.23	first rework, corrected by the attack then confirmed independently
Ohio	2,564.15	2,564.15	3,647.26	second rework from local documents, survived the attack
Oklahoma	1,284.42	2,008.78	3,141.71	second rework from local documents, survived the attack (cap-bound; children insured)
South Dakota	1,788.96	2,623.12	3,623.24	second rework; one disputed line settled by a third reading of the document
Utah	1,058.31	2,332.66	2,982.66	second rework from local documents, survived the attack
West Virginia	1,724.21	2,518.77	3,368.48	second rework from local documents, survived the attack
Wisconsin	3,117.35	4,491.71	4,926.24	first rework, survived the attack
Wyoming	1,900.85	2,801.97	2,801.97	second rework from local documents, survived the attack

One row is held out. The figure shown is the latest computed and is not to be cited.

State	Status	Latest S1 / S2 / S3	Why
Georgia	held out	1671.47 / 510.07 / 1643.01	five analyses agree the literal enacted formula gives S2 below S1 and the Commission's calculator guide reproduces it to the cent; not ranked

Per-row detail, including every document read and every defect found, is in the JSON files in this folder: `repaired-rows-2026-09-04.json`, `attack-on-repaired-2026-09-04.json`, `blind-confirm-2026-09-04.json`, `rerun-from-docs-2026-09-04.json` and `settle-five-2026-09-05.json`; the tier itself is `tier-50-2026-09-05.json`. `MANIFEST.md` lists every downloaded document for all fifty-one jurisdictions with its title, edition and source URL; the documents themselves (about 330 MB) are available on request.