

# CHILD SUPPORT COMMITTEE

November 8, 2011

12:00 – 1:00 p.m.

Arizona State Courts Building, Conference Room 345A

1501 W. Washington St.

Phoenix, Arizona 85007

Teleconference: 602-452-3192 Access: 1114

Webex link:

<https://arizonacourts.webex.com/arizonacourts/j.php?ED=185368797&UID=1262483812&PW=NYWQ4N2NjMjgw&RT=MIM1>

## Statute Review Workgroup Agenda

Chairman Comm. Kupiszewski

1. **Welcome and announcements**..... *Comm. Kupiszewski*
2. **Discuss proposed amendments** ..... *Janet Sell and Don Vert*  
ARS 25-681 Child support or spousal support arrest warrant  
ARS 25-685 Entry into criminal information system  
  
\_\_\_\_\_ *Action Item/Vote*
3. **Discuss proposed amendments** ..... *Pat Griffin and Janet Sell*  
ARS 25-320(M) Child support; factors; methods of payment; additional enforcement  
ARS 25-502 Jurisdiction, venue and procedure; additional enforcement provisions  
  
\_\_\_\_\_ *Action Item/Vote*
4. **Review and discuss red-lined matrix**..... *Comm. Kupiszewski*
5. **Review and update strategic plan**..... *Comm. Kupiszewski*
6. **Call to the Public**..... *Comm. Kupiszewski*  
This is the time for the public to comment. Members of the workgroup may not discuss items that are not specifically identified on the agenda. Therefore, pursuant to A.R.S. § 38-431.01(H), action taken as a result of public comment will be limited to directing staff to study the matter, responding to any criticism, or scheduling the matter for further consideration and decision at a later date.
7. **Set next agenda**..... *Comm. Kupiszewski*

### Next Meeting

December 13, 2011

Conference Room – 230

12:00 p.m. to 1:00 p.m.

All times are approximate. The Chair reserves the right to set the order of the agenda. Please contact Kathy Sekardi, Staff to the Child Support Committee at (602) 452-3253, with any questions concerning this Agenda. Persons with a disability may request reasonable accommodations by contacting Julie Graber at (602) 452-3250. Requests should be made as early as possible to allow time to arrange the accommodation.



# *Statute Review Workgroup*

## *Minutes*

<b>Date:</b> October 18, 2011	<b>Time:</b> Noon to 1 p.m.	<b>Location:</b> AOC – Conf. Rm 119A
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**Minute Taker:** Kathy Sekardi, Julie Graber

**Members Attending:**

- |                                                                   |                                                           |
|-------------------------------------------------------------------|-----------------------------------------------------------|
| <input type="checkbox"/> Comm. Stephen Kupiszewski (Acting Chair) | <input checked="" type="checkbox"/> Veronica Hart Ragland |
| <input checked="" type="checkbox"/> Theresa Barrett               | <input checked="" type="checkbox"/> Bianca Varelas Miller |
| <input checked="" type="checkbox"/> Janet Sell                    | <input checked="" type="checkbox"/> Donald Vert           |
| <input type="checkbox"/> Pat Griffin                              | <input checked="" type="checkbox"/> Farrah Watkins        |
| <input type="checkbox"/> Brandon Maxwell                          |                                                           |

**Staff/Admin. Support:** Kathy Sekardi, Julie Graber

**Guests:** None.

**Matters Considered:**

**1. Welcome and announcements**

Meeting commenced at 12:20 p.m. with a quorum. Janet Sell facilitated the meeting in Comm. Kupiszewski's absence.

**2. Review and discuss red-lined matrix**

In keeping with Comm. Kupiszewski's prior query, the workgroup reviewed the question: "Why are we revising the guidelines?" The guidelines could be simplified to improve understandability and accessibility for the general public. Ms. Barrett proposed making use of enhancements that stemmed from Child Support Guidelines Review Committee's review process and incorporating those new elements such as a table of contents, definitions of terms and expanded examples into the current guidelines. Members noted it was important that the public understand the difference between the guidelines and a guidelines' *model* (i.e., income shares model), and proposed further education and outreach to clarify the difference. Some members inquired about the vetting process. The vetting process was described and emphasis was placed on transparency and a thoughtful and deliberate process.

**3. Review and update strategic plan**

Ms. Watkins expressed interest in spousal maintenance enforcement. Some concerns were raised about the appropriateness of the topic for the workgroup. Mr. Vert called attention to spousal maintenance arrest warrants that expire after one year when there is no corresponding child support order and sought equal treatment between spousal maintenance and child support arrest warrants. Ms. Sell identified that A.R.S. sections 25-681 and 25-685 could be amended to include spousal support. Members agreed to add spousal maintenance arrest warrants to the strategic plan for 2011. Mr. Vert volunteered to work on the proposed legislation to review at the next meeting.

With regard to the federal IWO form, Ms. Barrett advised that the topic would be brought to court leadership's attention to obtain feedback for implementation planning purposes. Accordingly, she proposed holding off on new legislation until next session when language could be written to address specific challenges, if any, encountered during the implementation process.

**4. Call to the Public**

No members of the general public were in attendance.

**5. Set next agenda**

For next agenda, SRWG will continue to review and discuss the red-lined matrix.

Meeting adjourned at 1:12 p.m.

1           25-681. Child support or spousal support arrest warrant; definition

2           A. In any action or proceeding pursuant to section 25-502, on motion of a  
3 party or on its own motion the court may issue a child support or **spousal support**  
4 arrest warrant if the court finds that all of the following apply to the person for whom  
5 the warrant is sought:

6           1. The person was ordered by the court to appear personally at a specific  
7 time and location.

8           2. The person received actual notice of the order, including a warning that the  
9 failure to appear might result in the issuance of a child support **or spousal support**  
10 arrest warrant.

11           3. The person failed to appear as ordered.

12           B. The judicial officer shall order the child support **or spousal support** arrest  
13 warrant and the clerk shall issue the warrant. The warrant shall contain the name of  
14 the person to be arrested and other information required to enter the warrant in the  
15 Arizona criminal justice information system. The warrant shall command that the named  
16 person be arrested and either remanded to the custody of the sheriff or brought before  
17 the judicial officer or, if the judicial officer is absent or unable to act, the nearest or  
18 most accessible judicial officer of the superior court in the same county. A warrant  
19 that is issued pursuant to this section remains in effect until it is executed or  
20 extinguished by the court.

21           C. The court shall determine and the warrant shall state the amount the  
22 arrested person shall pay in order to be released from custody.

23           D. For the purposes of this article, "child support **or spousal support** arrest  
24 warrant" means an order that is issued by a judicial officer in a noncriminal child  
25 support **or spousal support** matter and that directs a peace officer in this state to  
26 arrest the person named in the warrant and bring the person before the court.  
27

SRWG  
November 18, 2011 Meeting  
Proposed Amendment

- 1           25-685. Entry into criminal information system
- 2           Child support or spousal support arrest warrants shall be entered in the wanted
- 3           person file of the Arizona criminal justice information system.

## **2012 LEGISLATIVE PROPOSAL**

### **IMAGED DOCUMENTS**

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#### **Purpose:**

Allow the Department to file copies of imaged child support enforcement documents with the Superior Court without the requirement to maintain the original certified paper copy.

#### **What Problem Are We Solving?**

Arizona statute currently permits the Department's child support program to file documents with the Superior Court electronically. However, the electronic document must state the copy was certified before it was electronically transmitted. The requirement implies the transmitter must have a hard copy of the transmitted document.

Arizona courts currently work with and accept electronically submitted documents from the Clerks of Court. The Clerks of the Court are not required under A.R.S. Title 12 Chapter 2 to maintain hard copies of certified documents for filing purposes. Therefore, by matching the Clerks of the Court's filing procedures, the proposed amendments will streamline the filing process for the Department.

#### **Benefits:**

- Filing procedures will be simplified allowing the Department to file imaged documents without being required to maintain a hard copy, matching the process used by the Clerks of Court.
- Each case will have only one electronic file, eliminating duplication
- All Department offices will have access to the same electronic file, enabling more efficient customer service by ensuring access to files electronically, rather than sending clients to another office because a hard case file is being housed in a different regional office or county.

#### **Statutes Affected:**

- ARS § 25-320 (M)
- ARS § 25-502 (H)

**2012 LEGISLATIVE PROPOSAL**  
**IMAGED DOCUMENTS**

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**A.R.S. §§ 25-320(M) & 25-502(H)**

25-320. Child support; factors; methods of payment; additional enforcement provisions; definitions

- 1  
2  
3 A. In a proceeding for dissolution of marriage, legal separation, maintenance or  
4 child support, the court may order either or both parents owing a duty of  
5 support to a child, born to or adopted by the parents, to pay an amount  
6 reasonable and necessary for support of the child, without regard to marital  
7 misconduct.
- 8 B. If child support has not been ordered by a child support order and if the court  
9 deems child support appropriate, the court shall direct, using a retroactive  
10 application of the child support guidelines to the date of filing a dissolution of  
11 marriage, legal separation, maintenance or child support proceeding, the  
12 amount that the parents shall pay for the past support of the child and the  
13 manner in which payment shall be paid, taking into account any amount of  
14 temporary or voluntary support that has been paid. Retroactive child support  
15 is enforceable in any manner provided by law.
- 16 C. If the parties lived apart before the date of the filing for dissolution of  
17 marriage, legal separation, maintenance or child support and if child support  
18 has not been ordered by a child support order, the court may order child  
19 support retroactively to the date of separation, but not more than three  
20 years before the date of the filing for dissolution of marriage, legal  
21 separation, maintenance or child support. The court must first consider all  
22 relevant circumstances, including the conduct or motivation of the parties in  
23 that filing and the diligence with which service of process was attempted on  
24 the obligor spouse or was frustrated by the obligor spouse. If the court  
25 determines that child support is appropriate, the court shall direct, using a  
26 retroactive application of the child support guidelines, the amount that the  
27 parents must pay for the past support of the child and the manner in which  
28 payments must be paid, taking into account any amount of temporary or  
29 voluntary support that has been paid.
- 30 D. The supreme court shall establish guidelines for determining the amount of  
31 child support. The amount resulting from the application of these guidelines  
32 is the amount of child support ordered unless a written finding is made,  
33 based on criteria approved by the supreme court, that application of the  
34 guidelines would be inappropriate or unjust in a particular case. The supreme  
35 court shall review the guidelines at least once every four years to ensure that  
36 their application results in the determination of appropriate child support  
37 amounts. The supreme court shall base the guidelines and criteria for  
38 deviation from them on all relevant factors, including:  
39 1. The financial resources and needs of the child.  
40 2. The financial resources and needs of the custodial parent.  
41 3. The standard of living the child would have enjoyed had the marriage not  
42 been dissolved.  
43 4. The physical and emotional condition of the child, and the child's  
44 educational needs.  
45 5. The financial resources and needs of the noncustodial parent.

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1           6. The medical support plan for the child. The plan should include the child's  
2           medical support needs, the availability of medical insurance or services  
3           provided by the Arizona health care cost containment system and whether a  
4           cash medical support order is necessary.

5           7. Excessive or abnormal expenditures, destruction, concealment or  
6           fraudulent disposition of community, joint tenancy and other property held in  
7           common.

8           8. The duration of parenting time and related expenses.

9       E. Even if a child is over the age of majority when a petition is filed or at the  
10       time of the final decree, the court may order support to continue past the  
11       age of majority if all of the following are true:

12           1. The court has considered the factors prescribed in subsection D of this  
13           section.

14           2. The child is severely mentally or physically disabled as demonstrated by  
15           the fact that the child is unable to live independently and be self-supporting.

16           3. The child's disability began before the child reached the age of majority.

17       F. If a child reaches the age of majority while the child is attending high school  
18       or a certified high school equivalency program, support shall continue to be  
19       provided during the period in which the child is actually attending high school  
20       or the equivalency program but only until the child reaches nineteen years of  
21       age unless the court enters an order pursuant to subsection E of this section.  
22       Notwithstanding any other law, a parent paying support for a child over the  
23       age of majority pursuant to this section is entitled to obtain all records  
24       related to the attendance of the child in the high school or equivalency  
25       program.

26       G. If a personal check for support payments and handling fees is rightfully  
27       dishonored by the payor bank or other drawee, the person obligated to pay  
28       support shall make any subsequent support payments and handling fees only  
29       by cash, money order, cashier's check, traveler's check or certified check. If  
30       a person required to pay support other than by personal check demonstrates  
31       full and timely payment for twenty-four consecutive months, that person  
32       may pay support by personal check if these payments are for the full  
33       amount, are timely tendered and are not rightfully dishonored by the payor  
34       bank or other drawee.

35       H. Subsection G of this section does not apply to payments made by means of  
36       an assignment.

37       I. If after reasonable efforts to locate the obligee the clerk or support payment  
38       clearinghouse is unable to deliver payments for the period prescribed in  
39       section 25-503 due to the failure of the person to whom the support has  
40       been ordered to be paid to notify the clerk or support payment clearinghouse  
41       of a change in address, the clerk or support payment clearinghouse shall not  
42       deliver further payments and shall return the payments to the obligor  
43       consistent with the requirements of section 25-503.

44       J. An order for child support shall assign responsibility for providing medical  
45       insurance for the child who is the subject of the support order to one of the  
46       parents and shall assign responsibility for the payment of any medical costs

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1 of the child that are not covered by insurance according to the child support  
2 guidelines. Each parent shall provide information to the court regarding the  
3 availability of medical insurance for the child that is accessible and available  
4 at a reasonable cost. In title IV-D cases, the parent responsible pursuant to  
5 court order for providing medical insurance for the child shall notify the child  
6 support enforcement agency in the department of economic security if  
7 medical insurance has been obtained or if the child is no longer covered  
8 under an insurance plan.

9 K. If the court finds that neither parent has the ability to obtain medical  
10 insurance for the child that is accessible and available at a reasonable cost,  
11 the court shall:

12 1. In a title IV-D case, in accordance with established title IV-D criteria,  
13 establish a reasonable monthly cash medical support order to be paid by the  
14 obligor. If medical assistance is being provided to a child under title XIX of  
15 the social security act, cash medical support is assigned to the state pursuant  
16 to section 46-407. On verification that the obligor has obtained private  
17 insurance, the cash medical support order terminates by operation of law on  
18 the first day of the month after the policy's effective date or on the date the  
19 court, or the department in a title IV-D case, is notified that insurance has  
20 been obtained, whichever is later. If the private insurance terminates, the  
21 cash medical support order automatically resumes by operation of law on the  
22 first day of the month following the termination date of the policy.

23 2. Order one parent to provide medical insurance when it becomes accessible  
24 and available at a reasonable cost.

25 3. Order that medical costs in excess of the cash medical support amount  
26 shall be paid by each parent according to the percentage assigned for  
27 payment of uninsured costs.

28 L. In a title IV-D case, if the court orders the noncustodial parent to obtain  
29 medical insurance the court shall also set an alternative cash medical support  
30 order to be paid by that parent if the child is not covered under an insurance  
31 plan within ninety days after entry of the order or if the child is no longer  
32 covered by insurance. The court shall not order the custodial parent to pay  
33 cash medical support.

34 M. In title IV-D cases the superior court shall accept for filing any documents  
35 that **HAVE BEEN ELECTRONICALLY IMAGED, REPRODUCED OR** are received  
36 through electronic transmission if the electronically reproduced document  
37 states that the copy used ~~for the electronic transmission~~ was certified before  
38 it was electronically **IMAGED, REPRODUCED OR** transmitted.

39 N. The court shall presume, in the absence of contrary testimony, that a parent  
40 is capable of full-time employment at least at the applicable state or federal  
41 adult minimum wage, whichever is higher. This presumption does not apply  
42 to noncustodial parents who are under the age of eighteen and who are  
43 attending high school.

44 O. An order for support shall provide for an assignment pursuant to sections 25-  
45 504 and 25-323.

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- 1 P. Each licensing board or agency that issues professional, recreational or  
2 occupational licenses or certificates shall record on the application the social  
3 security number of the applicant and shall enter this information in its  
4 database in order to aid the department of economic security in locating  
5 parents or their assets or to enforce child support orders. This subsection  
6 does not apply to a license that is issued pursuant to title 17 and that is not  
7 issued by an automated drawing system. If a licensing board or agency  
8 allows an applicant to use a number other than the social security number on  
9 the face of the license or certificate while the licensing board or agency keeps  
10 the social security number on file, the licensing board or agency shall advise  
11 an applicant of this fact.
- 12 Q. For the purposes of this section:
- 13 1. "Accessible" means that insurance is available in the geographic region  
14 where the child resides.
- 15 2. "Child support guidelines" means the child support guidelines that are  
16 adopted by the state supreme court pursuant to 42 United States Code  
17 sections 651 through 669B.
- 18 3. "Date of separation" means the date the married parents ceased to  
19 cohabit.
- 20 4. "Reasonable cost" means an amount that does not exceed the higher of  
21 five per cent of the gross income of the obligated parent or an income-based  
22 numeric standard that is prescribed in the child support guidelines.
- 23 5. "Support" has the same meaning prescribed in section 25-500.
- 24 6. "Support payments" means the amount of money ordered by the court to  
25 be paid for the support of the minor child or children.
- 26

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1 **25-502. Jurisdiction, venue and procedure; additional enforcement provisions**

- 2 A. The superior court has original jurisdiction in proceedings brought by the  
3 department, its agents, a person having physical custody of a child or a party  
4 to the case to establish, enforce or modify the duties of support as prescribed  
5 in this chapter. All such proceedings are civil actions except as provided in  
6 section 25-511. Proceedings to enforce the duties of support as prescribed in  
7 this chapter may be originated in the county of residence of the respondent  
8 or the petitioner or of the child or children who are the subject of the action.
- 9 B. A proceeding to establish support must originate in the county where the  
10 child resides or, if the child resides out of state, the county of this state  
11 where the party filing the petition to establish support resides, if either of the  
12 following applies:
- 13 1. An action does not exist under this title.  
14 2. Paternity was established without a court order pursuant to section 36-  
15 334.
- 16 C. A person or the department or its agent must file a petition to establish or  
17 modify a child support order in the superior court in the county of the last  
18 order issued under this title if an order exists in this state. If a person wishes  
19 the case transferred to the county of this state where the child resides or, if  
20 the child resides out of state, the county of this state where the party  
21 requesting the transfer resides, the person must file a request for transfer  
22 with the clerk of the superior court that issued the last order.
- 23 D. A request for transfer pursuant to subsection C of this section must include a  
24 petition or motion regarding support, a statement of payments in default, if  
25 applicable, and the transmittal fee prescribed in section 12-284. The  
26 responding party may object to the transfer by filing an objection and  
27 affidavit within twenty days after service of the request to transfer.
- 28 E. If the clerk does not receive an objection and affidavit pursuant to subsection  
29 D of this section, the clerk shall issue the transfer order and transfer the  
30 proceeding and all related court files to the other county within thirty days  
31 after service of the request to transfer. If the clerk receives an objection and  
32 affidavit within the time prescribed in subsection D of this section, the clerk  
33 shall notify all parties of the date of the hearing at least ten days before the  
34 hearing date. The court may hear evidence relevant only to the issue of the  
35 transfer. If after that hearing the court orders the transfer, the clerk shall  
36 transfer the proceeding and court files within ten days after the order. The  
37 county to which the transfer is made retains the court files and venue for all  
38 purposes and the transferring county shall not retain a copy of those files.
- 39 F. The county to which a transfer is made pursuant to subsection D or E of this  
40 section shall proceed as if the proceeding was brought in that county  
41 originally. A judgment from that county has the same effect and may be  
42 enforced or modified as a judgment from the original county.
- 43 G. The party who petitioned for transfer must pay the postadjudication fee  
44 prescribed in section 12-284 to the county to which the proceeding was  
45 transferred within ten days after the date the clerk of the court mails the  
46 notice of the requirement to pay the postadjudication fee. If the party does

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1 not pay the fee by that date, the transfer order is automatically nullified and  
2 the court clerk shall return the proceeding and all related court files to the  
3 original county.

4 H. Except as provided in section 25-510, in title IV-D cases the superior court  
5 shall accept for filing any documents that **HAVE BEEN ELECTRONICALLY**  
6 **IMAGED, REPRODUCED OR** are received through electronic transmission if  
7 the electronically reproduced document states that the copy used ~~for the~~  
8 ~~electronic transmission~~ was certified before it was electronically **IMAGED,**  
9 **REPRODUCED OR** transmitted.

10 I. On filing of the petition and, if applicable, after a transfer is completed, the  
11 court shall issue an order requiring the responding party to appear at the  
12 time and place set for the hearing on the petition. Service of the order and a  
13 copy of the petition shall be as provided in the Arizona rules of family law  
14 procedure. If the responding party receives notice of a hearing but fails to  
15 appear, the court may issue a child support arrest warrant as provided in  
16 article 5 of this chapter and shall require that the responding party pay at the  
17 time of arrest an amount set by the court to secure the responding party's  
18 release from custody pending an appearance at the next scheduled hearing.  
19 The court also may find the party to be in contempt of court pursuant to  
20 section 12-864.01 and set an amount to be paid to purge the contempt. Any  
21 purge amount set by the court shall supersede the amount required to be set  
22 to secure the responding party's release, and the responding party shall pay  
23 only the purge amount as a condition of release from custody. Any amounts  
24 paid under this section shall be deposited with the clerk of the court or the  
25 support payment clearinghouse and credited first to the responding party's  
26 current child support obligation and then to arrearages. The court may grant  
27 a default judgment for arrearages on a prima facie showing of the amount  
28 due.

29 J. The department or its agent or a parent, guardian or custodian may file with  
30 the clerk of the superior court a request to establish child support. The  
31 request must include a proposed order, the worksheet for child support and a  
32 notice of the right to request a hearing within twenty days after service in  
33 this state or within thirty days after service outside this state. The request,  
34 proposed order, worksheet and notice shall be served pursuant to the  
35 Arizona rules of family law procedure on all parties, and in a title IV-D case,  
36 on the department or its agent. In a title IV-D case, the department or its  
37 agent may serve all parties by certified mail, return receipt requested. If a  
38 party does not request a hearing within the time prescribed by this  
39 subsection, the court shall review the proposed order and worksheet and  
40 enter an appropriate order or set the matter for a hearing. In a title IV-D  
41 case, the department or its agent shall enforce the order.

42 K. Each licensing board or agency that issues professional, recreational or  
43 occupational licenses or certificates shall record on the application the social  
44 security number of the applicant and shall enter this information in its  
45 database in order to aid the department of economic security in locating  
46 parents or their assets or to enforce child support orders. This subsection

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1           does not apply to a license that is issued pursuant to title 17 and that is not  
2           issued by an automated drawing system. If a licensing board or agency  
3           allows an applicant to use a number other than the social security number on  
4           the face of the license or certificate while the licensing board or agency keeps  
5           the social security number on file, the licensing board or agency shall advise  
6           an applicant of this fact.  
7

LEGISLATIVE CHILD SUPPORT COMMITTEE

**Statute Review Workgroup Strategic Planning – 2011**

GOALS FOR 2011:

1. ARS § 23-722.01 Employer or payor reporting; exceptions
  - **PROPOSED LANGUAGE TO CSC: APPROVED BY CSC 9-9-11, to Leg. Council**
2. ARS § 25-505.01 Administrative income withholding order; notice; definition
  - **PROPOSED LANGUAGE TO CSC: APPROVED BY CSC 9-9-11, to Leg. Council**
3. Possibly review different child support guidelines models with CSC
  - **START REVIEWING RED-LINE MATRIX ON 10-18-11**
4. **FROM THE CSC 9-9-11:** Review enhanced version of income shares model guidelines - Pending
  - **FIRST DRAFT TO CSC: APPROVED BY CSC 9-9-11, SEND TO SRWG**
5. **FROM THE CSC 9-9-11:** Federal IWO form: SRWG to review implementation of IWO form to conform to uniform form being presented by federal government. **APPROVED BY CSC 9-9-11 SEND TO SRWG TO REVIEW**
6. Recapture of overpayment of child support due to various reasons, not only due to change in custody. **CONSENSUS TO LEAVE STATUTE AS IS AND FOCUS ON JUDICIAL TRAINING- (06/14/11)** Downward modification overpayment – feedback from judiciary. Education issue Comm. Kupiszewski will speak with Judge Carey Hyatt
7. ARS § 25-505.02 Insurance information exchange
  - **PROPOSED LANGUAGE TO CSC: APPROVED BY CSC 9-9-11, to Leg. Council**
8. (From 10-18-11 SRWG meeting) Spousal support enforcement ARS § 25-681 and ARS § 25-685 – propose amendments

GOALS FOR 2012:

1. Update statutory language to replace “interstate” to “intergovernmental” (non-UIFSA) statutes
2. **FROM THE CSC 9-9-11:** SRWG to initiate discussion with regard to a simplified procedure with unreimbursed medical expenses as related to child support orders including notice issues, statutory scenes to accomplish such, and simplification of forms.