

How to Calculate Back Child Support

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Arrears v. Past Support

- **Arrears** are defined by Minn. Stat. § 518A.26, Subd. 3 which states:
Arrears are amounts that accrue pursuant to an obligor's failure to comply with a support order. Past support and pregnancy and confinement expenses contained in a support order are arrears if the court order does not contain repayment terms. Arrears also arise by the obligor's failure to comply with the terms of a court order for repayment of past support or pregnancy and confinement expenses. An obligor's failure to comply with the terms for repayment of amounts owed for past support or pregnancy and confinement turns the entire amount owed into arrears.
- **Past support**, also known as back support or retroactive support is not as clearly defined by statute. A practitioner needs to look to case law as well as Minn. Stat. § 518A.82 to learn about the issue of past support. Past support is generally understood to be support which accrues prior to the effective date of the first order for an ongoing support obligation. In custody and support actions, there may be a past support obligation for up to two years prior to the commencement of the action based upon Minn. Stat. § 518A.82. In a dissolution case there may be a past support obligation going back to the commencement of the dissolution or the date of separation based upon case law discussed below.
- Labelling retroactive or past child support as arrears, when it is not, can be the basis for a reversal on appeal.
- Past support should not be labeled as arrears.
- Use of the label “arrears” can trigger enforcement remedies that can create a hardship for an obligor who has not yet had the opportunity to pay his past support obligation.
- Past due child support should only be labeled as arrears when the obligor has disobeyed a prior order to pay their monthly child support obligation or when they have not complied with repayment terms for past support in a prior order.

Past Support in Custody, Paternity, and Support Cases

- Minn. Stat. § 518A.82 was formerly Minn. Stat. § 256.87. The statute moved over to 518A on July 1, 2024 (with the revision effective August 1, 2025). Minn. Stat. § 518A.82 is almost identical to the last version of Minn. Stat. § 256.87.
- Minn. Stat. § 518A.82, Subd. 1 addresses past support for public assistance (PA):
*A parent of a child is liable for the amount of public assistance, as defined in section 518A.81, furnished to and for the benefit of the child, including any assistance furnished for the benefit of the caretaker of the child, which the parent has had the ability to pay. Ability to pay must be determined according to this chapter. **The parent's liability is limited to the two years immediately preceding the commencement of the***

action, except that where child support has been previously ordered, the state or county agency providing the assistance, as assignee of the obligee, shall be entitled to judgments for child support payments accruing within ten years preceding the date of the commencement of the action up to the full amount of assistance furnished. The action may be ordered by the state agency or county agency and shall be brought in the name of the county or in the name of the state agency against the parent for the recovery of the amount of assistance granted, together with the costs and disbursements of the action.

Emphasis added.

- Minn. Stat. § 518A.82, Subd. 5 addresses past support for non-public assistance (NPA): *A person or entity having physical custody of a dependent child not receiving public assistance as defined in section 518A.81 **has a cause of action for child support against the child's noncustodial parents.** Upon a motion served on the noncustodial parent, the court shall order child support payments, including medical support and child care support, from the noncustodial parent under this chapter. **A noncustodial parent's liability may include up to the two years immediately preceding the commencement of the action.** This subdivision applies only if the person or entity has physical custody with the consent of a custodial parent or approval of the court.*

Emphasis added.

- Minn. Stat. § 257.75, Subd. 3 notes that a ROP is a basis for bringing an action to award custody and to establish child support. The statute specifically notes that the child support obligation being established may include up to the two years immediately preceding the commencement of the action.
- Minn. Stat. § 257.66, Subd. 4 is a part of the Minnesota Parentage Act (MPA) and applies to paternity cases, the statute states:

*Support judgments or orders ordinarily shall be for periodic payments which may vary in amount. In the best interest of the child, a lump-sum payment may be ordered in lieu of periodic payments of support. **The court shall limit the parent's liability for past support of the child to the proportion of the expenses that the court deems just, which were incurred in the two years immediately preceding the commencement of the action.** In determining the amount of the parent's liability for past support, the court may deviate downward from the guidelines if:*

- (1) the child for whom child support is sought is more than five years old and the obligor discovered or was informed of the existence of the parent and child relationship within one year of commencement of the action seeking child support;*
- (2) the obligor is a custodian for or pays support for other children; and*
- (3) the obligor's family income is less than 175 percent of the federal poverty level.*

Past Support in Marital Dissolution Cases

- Past support for married parties is determined as a part of the dissolution action, and is not determined in a support action (you do not utilize Minn. Stat. § 518A.82, formerly Minn. Stat. § 256.87 for married parties).
 - In re the Support of J.M.K. & S.R.K., 507 N.W.2d 459 (Minn. Ct. App. 1993)
- Generally past support can be requested back to the date of the commencement of the dissolution proceeding, but the court does have the power to order past support all the way back to the date of separation if it does so as a part of the final decree.
 - Korf v. Korf, 553 N.W.2d 706 (Minn. Ct. App. 1996)
- Temporary motions may be a tool to be utilized regarding the retroactivity of support.
 - Minn. Stat. § 518.131

The Issue of Retroactivity in Modification Cases

- This CLE is focused on the calculation of past support which occurs at the start of an action.
- However, for ease of reference, the relevant statute governing the issue of retroactive modifications of child support is Minn. Stat. § 518A.39, Subd. 2(f).
 - Minn. Stat. § 518A.39, Subd. 2(f) states that for modifications, child support can only be modified back to the date of service of the motion to modify support.
 - Leifur v. Leifur, 820 N.W.2d 40 (Minn. Ct. App. 2012)
- Despite the general rule found in Minn. Stat. § 518A.39, Subd. 2(f), retroactive modifications of child care support are permissively allowed pursuant to Minn. Stat. § 518A.39, Subd. 7.
 - *The court **may** provide that a decrease in the amount of the child care based on a decrease in the actual child care expenses is effective as of the date the expense is decreased.*
 - Thus, for child care support, the Court may utilize its discretion to retroactively decrease child care support back further than the date of service of the motion to modify child care support.
- Parties may bind themselves to alternative effective date.
 - Minn. Stat. § 518A.39, Subd. 2(l).

Helpful Case Law:

Precedential:

- Davis v. Davis, 631 N.W.2d 822 (Minn. Ct. App. 2001)
 - Initial award of child support made in post-dissolution proceeding cannot be made retroactive, where divorce decree reserved past child support and stated child support would be established when obligee's income reached certain limit.

- Schaefer v. Weber, 567 N.W.2d 29 (Minn. 1997)
 - The father was liable for child support beginning two years prior to the filing of the paternity action.
- Korf v. Korf, 553 N.W.2d 706 (Minn. Ct. App. 1996)
 - Marital dissolution case
 - Date of separation: 6/1/1992
 - Commencement of dissolution action: 12/28/1992
 - Order for Temporary Relief: 3/10/1993
 - In the temporary order, the court ordered past support back to 6/1/1992, the date of separation (6 months prior to the start of the dissolution action).
 - The temporary order was incorporated into the final decree.
 - The obligor argued that past support could not be ordered prior to the commencement of the dissolution.
 - “Generally a trial court may not order retroactive child support for dates prior to the commencement of an action under chapter 518.”
 - However, the Court of Appeals carved out an exception, and said that a trial court may order past support back to the date of separation as a part of the final decree.
 - The trial court may consider all payments made by the obligor since the time of separation.
- In re the Support of J.M.K. & S.R.K., 507 N.W.2d 459 (Minn. Ct. App. 1993)
 - For married parties, past support, if requested, is addressed in a dissolution action.
- Cty. of Nicollet v. Haakenson, 497 N.W.2d 611 (Minn. Ct. App. 1993)
 - Retroactive (past) child support is not an arrearage. An arrearage is money overdue and unpaid. Retroactive child support is only an arrearage if it is not paid when due.
- McNeal v. Swain, 477 N.W.2d 531 (Minn. Ct. App. 1991)
 - Decided under an earlier version of Minn. Stat. § 257.66, Subd. 4, which contains the language about past support being limited to a proportion of expenses which is just.
 - The standard of review is abuse of discretion
 - The court should consider the earnings, needs, and resources of the parties and the child.
 - The court should make particularized findings.
 - Negative treatment: Pasket v. Hale, No. CO-02-1884, 2003 WL 21321793 (Minn. Ct. App. June 10, 2003) – McNeal was decided based on an earlier version of

Minn. Stat. § 257.66, Subd. 4 which didn't include some of the language which is now in the statute.

- Noren v. Kunza, 465 N.W.2d 717 (Minn. Ct. App. 1991)
 - A parent not receiving public assistance may be awarded past child support for expenses incurred in the two years immediately preceding the commencement of the action under Minn. Stat. § 257.66, Subd. 4.
- Rieck v. Lambert, 396 N.W.2d 269 (Minn. Ct. App. 1986)
 - The court should consider the earnings, needs, and resources of the parties and the child.
- Nash v. Allen, 392 N.W.2d 244 (Minn. Ct. App. 1986)
 - Decided under an earlier version of Minn. Stat. § 257.66, Subd. 4.
 - The standard of review is abuse of discretion
- Braun v. Braun, 350 N.W.2d 492 (Minn. Ct. App. 1984)

Non-Precedential:

- Abdi v. Somane, No. A24-0989, 2025 WL 1789167 (Minn. Ct. App. June 30, 2025)
 - Remand to district court to reconsider whether retroactive child support is warranted where district court's determination of obligor's income was clearly erroneous and Court of Appeals also remanded issue of obligor's gross monthly income.
- Atak v. Atak, No. A24-1023, 2025 WL 1552726 (Minn. Ct. App. June 2, 2025)
 - Marital dissolution case
 - The mother filed a petition for dissolution in April 2022.
 - The mother requested child support retroactive to the parties' date of separation.
 - The mother provided evidence about expenses she paid for the children from and after the date of separation.
 - The Court reduced the father's cash equalizer payment by a "back child support" amount which was calculated based upon support owed from the time of separation through the date of trial.
 - "Because 'a parent's child support responsibilities begin at the child's birth,' a district court may order retroactive child support as part of a final decree.... The district court 'may consider all payments made by the obligor since the time of separation and address all of the parties' concerns in a single action.'"
 - This case explains the difference between arrears and back (or past) child support. The court notes that arrears are amounts that accrued based on an obligor's failure to comply with an order; whereas past support is permissible without an existing child support order in place.

- The court found that the district court “acted within its broad discretion by awarding [Mother] these expenses as additional child support.”
- In Re Custody of A.W.W., No A23-0452, 2024 WL 3016488 (Minn. Ct. App. June 17, 2024)
 - Custody case
 - The father filed a petition for custody on 6/10/2020.
 - The mother requested support retroactive to 2/2022.
 - The district court ordered support effective 2/2023.
 - The district court denied the request for past support because the father incurred significant expenses for supervised parenting time and therapy.
 - “Under the statute, determinations concerning liability for past support are committed to the district court’s discretion.”
 - “Such balancing of financial burdens was within the district court’s discretion and mother has failed to persuade us otherwise.”
- Arensberg v. Arensberg, No. A22-1608, 2024 WL 74433 (Minn. Ct. App. Jan. 8, 2024)
 - Where there is insufficient evidence to establish such retroactive child support, such as the evidence failing to establish how much the obligor paid before the dissolution trial, a trial court’s denial of retroactive child support will be upheld.
- Kemp v. Kemp, No. A22-0195, 2023 WL 2847303 (Minn. Ct. App. Apr. 10, 2023)
 - Recognizes date of separation can be ambiguous and affirmed district court’s award of back child support, inclusive of a brief period parties resided together.
 - District court did not abuse discretion by ordering obligor to pay child support accruing before obligee filed for divorce, before parties separated and after child’s birth.
 - Reversed district court’s calculation of child support as beginning to accrue before child’s birth.
 - Reversed district court’s treatment of back child support as an arrearage and order that the obligor’s back child support “be collected” at the statutory rate of 20%. Court of Appeals noted this treatment of arrears was an error because the obligor “could not have been in arrears...because he was never given an opportunity to pay” retroactive child support under an existing order citing Minn. Stat. § 518A.26, subd. 3, and County of Nicollet v. Haakenson, 497 N.W.2d 611, 616 (Minn. Ct. App. 1993).
- S.A. v. L.H., No. A21-0921, 2022 WL 1918963 (Minn. Ct. App. June 6, 2022)
 - In 2018, in a paternity action, the district court referred the issue of child support including past support to the expedited process.
 - The obligee did not proceed to the expedited process.
 - In 2019, the obligee filed a new action seeking child support including past support.

- The district court did not have the statutory authority to enter an order for past support in the new support action.
- Elmi v. Hashi, No. A21-0887, 2022 WL 1763587 (Minn. Ct. App. May 31, 2022)
 - Marital dissolution case
 - The standard of review is abuse of discretion.
 - The Court of Appeals affirmed the district court’s denial of the obligee’s claim for retroactive child support because the obligee did not accept voluntary payments offered by the obligor during the proceedings.
 - The Court of Appeals also found that Minn. Stat. § 256.87, Subd. 5 did not apply because the minor child was receiving medical assistance, and the mother did not have physical custody of the minor child with the court’s approval or the consent of the other parent.
- Stanton v. Curran, No. A20-0211, 2021 WL 317227 (Minn. Ct. App. Feb. 1, 2021)
 - Under Minnesota Statutes section 518.131, subdivision 5, a district court may, in its discretion, award retroactive child support by amending a temporary order in a final dissolution order.
- Kriesel v. Rossman, No. A19-0712, 2019 WL 7287079 (Minn. Ct. App. Dec. 30, 2019)
 - Labelling retroactive or past child support as arrears, when it is not, can be the basis for a reversal.
- Nyhus v. Ka, No. A18-1089, 2019 WL 1007776 (Minn. Ct. App. Mar. 4, 2019).
 - Minn. Stat. § 256.87, Subd 5 (now 518A.82) only provides a cause of action for past support against a non-custodial parent.
 - In this case, both parents were custodial parents and so past support could not be ordered.

General Considerations

- Make sure to plead (request) the issue of past support.
- The award of past support is very discretionary with the court.
- The language of the statute is permissive.
 - “May” is permissive. Minn. Stat. § 645.44, Subd. 15.
- Further, the case law supports the court’s discretion regarding the amount and award of past support.
- These factors can result in variation between past support awards in different cases.
- This discretion provides an opportunity for a practitioner to advocate for their client’s position.

- Practitioners for an obligee should consider providing evidence regarding the expenses that the obligee solely paid, and what the financial repercussions were of the client having to solely support the joint children.
- Practitioners for an obligor should consider providing evidence regarding voluntary payments made by the obligor, information about their financial situation which might have impacted their ability to pay in the past, and their ability to pay in the future.
- Practitioners representing an obligor may consider talking to their client about setting up voluntary child support payments at the date of separation. Even if the amount is not perfectly calculated, these payments can reduce their future past support obligation and may create goodwill with the obligee.
 - It is difficult to provide evidence regarding voluntary payments made in cash or in kind (i.e. obligor provided a box of diapers). Payments made by check or by Cash App or Venmo are easier to prove.
- Providing evidence regarding the parties' financial situations during the past support time period, step by step, in a clear and organized way, aids the court.
 - Avoid simply providing a lump sum amount for the entirety of the past support period.
 - Provide a break down of your calculation.

Calculation Basics

- First, what is the past support time period?
 - When did the parties separate?
 - When was the action commenced?
 - What is the date two years prior to the date of commencement of the action?
- Second, are there any events that occurred during the past support time period which would impact the child support calculation? If so, you may need to change the calculation with the start of the new period after the change.
 - Birth of a nonjoint child
 - Loss of a job
 - Change of employment
 - Change in the guidelines calculator
 - The last major change in the calculator occurred between 2022 and 2023, but child care and medical assistance contribution tables change periodically.
 - Changes to the court ordered parenting time schedule (and thus the PEA)
- Third, what were the historical incomes of each party during the past support period?

- Fourth, what voluntary child support payments were made by the obligor to the obligee during the past support time period?
- Fifth, are past child care support, past medical support, or pregnancy and confinement expenses being requested in addition to past basic support?
 - If so, what evidence is there regarding these historic costs?
- Run a guidelines calculation for each section of the past support time period and provide these calculations to the court.

See Past Support Information Sheet & Past Support Calculation Worksheet.

Should Potential Income Be Used to Calculate Past Support?

- Minn. Stat. § 518A.32, Subd. 1, provides a basis for utilizing potential income for past support calculations. The statute states:
*This section applies to child support orders, including orders for **past** support or reimbursement of public assistance, issued under this chapter, chapter 256, 257, 518B, or 518C.*
Emphasis added.
- However, as a practical matter, a judicial officer may use their discretion and not utilize potential income for past support. From a public policy standpoint, an obligor cannot retroactively change their behavior.

Documents to Gather

- Evidence of each party's income during the past support time period.
 - DEED wage records
 - PRISM wage records
 - Paystubs (particularly year end paystubs)
 - Tax returns (complete copies, personal and business)
 - W-2s and 1099s
 - Unemployment compensation records
- Evidence regarding any life changes
 - ROPs for nonjoint children
 - Medical records showing how long a party was off of work due to a health related issue
- Evidence of costs
 - Child care verification for expenses paid during the past support period
- Evidence of voluntary payments
 - Cancelled checks
 - Venmo/Cash App records

Determining a Monthly Payback Amount

- Minn. Stat. § 518A.53, Subd. 10 addresses the monthly payment towards child support arrears. Arrears are generally paid back at the rate of 20% of the amount of an ongoing child support order. However, for arrears the court can order a different specific payback amount towards arrears.
- The court also has flexibility and discretion in ordering a monthly payment amount for past support.
- Sometimes the court will order a lower payment amount (less than 20% of the ongoing obligation) in order to encourage prompt and regular payment by an obligor.
- The court may also consider the obligor's ability to pay in setting the past support payment as well as how long it will take for the total past support obligation to be paid based upon the monthly payment ordered.

Sample Language for Proposed Order

Sample Findings:

1. The Father had DEED wages for the time period from 1/1/2024 to 12/31/2024 of \$_____, or \$_____ per month (\$_____ / 12 months).

2. The Father had DEED wages for the time period from 1/1/2025 to 12/31/2025 of \$_____, or \$_____ per month (\$_____ / 12 months).

3. The Mother had DEED wages for the time period from 1/1/2024 to 12/31/2024 of \$_____, or \$_____ per month (\$_____ / 12 months).

4. The Mother had DEED wages for the time period from 1/1/2025 to 12/31/2025 of \$_____, or \$_____ per month (\$_____ / 12 months).

5. The parties' combined incomes and the support obligations have been calculated pursuant to Minn. Stat. § 518A. The calculations are attached as Exhibit 1 and are incorporated herein.

6. The County [party requesting past support] requests that the Court order past support for _____'s [obligor's] support obligation from _____ to _____.

OPTION:

7. Minn. Stat. § 257.66, Subd. 4 states in pertinent part:

...The court shall limit the parent's liability for past support of the child to the proportion of the expenses that the court deems just, which were incurred in the two years immediately preceding the commencement of the action. In determining the amount of the parent's liability for past support, the court may deviate downward from the guidelines if:

(1) the child for whom child support is sought is more than five years old and the obligor discovered or was informed of the existence of the parent and child relationship within one year of commencement of the action seeking child support;

*(2) the obligor is a custodian for or pays support for other children; **and***

(3) the obligor's family income is less than 175 percent of the federal poverty level.

Emphasis added.

8. _____ [obligor] argues that past support should not be ordered because _____.

9. _____ [joint child] is currently ____ years old. _____ [obligor] filed a Petition to Establish Custody on _____, which was _____ years prior to the commencement of this action on _____ [obligor] (service upon _____ [obligor]).

10. _____ [obligor] pays child support for their nonjoint children as set forth above.

11. _____'s [obligor's] monthly income is \$_____ per month; which is _____% of the federal poverty level.

12. The word "and" used in the list of the criteria needed for a downward deviation in past support indicates that **all** circumstances listed in Minn. Stat. § 257.66, Subd. 4 must be met.¹

13. In the case at hand, some of the circumstances listed in the statute are not present.

14. The joint child had financial needs during the period of _____ to _____. _____'s [obligor's] income is considerably higher than _____'s [obligee's] income. The Court finds that it is equitable for _____ to contribute to the joint child's financial needs during this time period. A downward deviation in past support is not supported by the record.

15. The historical income information for the parties and child support calculations can be summarized as follows:

Time Period	Mother's Income	Mother's NJ Child	Father's Income	Father's NJ CS obligation	Support Owed
_____ to _____	\$_____ per month		\$_____ per month	\$_____	Basic: \$_____ per month
_____ to _____	\$_____ per month		\$_____ per month	\$_____	Basic: \$_____ per month
_____ to _____	\$_____ per month		\$_____ per month	\$_____	Basic: \$_____ per month

¹ The plain language of a statute controls when the meaning of the statute is unambiguous. *State v. Boecker*, 893 N.W.2d 348 (Minn. 2017).

_____ to _____	\$____ per month		\$____ per month	\$____	Basic: \$____ per month
_____ to _____	\$____ per month		\$____ per month	\$____	Basic: \$____ per month
_____ to _____	\$____ per month		\$____ per month	\$____	Basic: \$____ per month

16. During the twenty-four (24) month period preceding the commencement of this action, from _____ to _____, _____ [obligor] had the ability to reimburse _____ [obligee] the sum of \$_____ for past support. This amount is calculated pursuant to Minn. Stat. § 518A.34.

OR

17. Thus, the total past child support obligation for the time period from _____ to _____ is calculated as follows:

- From _____ to _____, basic support of \$_____ * _____ months = \$_____
- From _____ to _____, basic support of \$_____ * _____ months = \$_____
- From _____ to _____, basic support of \$_____ * _____ months = \$_____
- From _____ to _____, basic support of \$_____ * _____ months = \$_____
- From _____ to _____, basic support of \$_____ * _____ months = \$_____
- From _____ to _____, basic support of \$_____ * _____ months = \$_____
- Total past support owed prior to any voluntary payments: \$_____

18. _____ [obligee] credibly testified that _____'s [obligor's] last voluntary payment to them in support of the joint minor child was in _____. This is prior to the two year past support time period. _____'s [obligor] past child support obligation is to be reduced by \$0 because they did not make any voluntary payments during the past support time period.

19. Thus, _____ [obligor] owes \$_____ in total past support (\$_____ - \$0).

20. Based upon _____'s [obligor's] financial circumstances the Court finds that a \$_____ per month payment towards his past child support is reasonable and affordable to them.

21. A past support payment of \$_____ per month is less than the default past support payment of 20% of ongoing child support per month (which would be \$_____ per month).

22. _____ [obligor] already owes a total ongoing support obligation of \$_____ per month; in addition to a basic support obligation of \$_____ per month for his nonjoint children. The Court finds that a lower past support payment is more affordable for _____ [obligor] at this time and will better enable him to meet his own living expenses and all of his support obligations.

OR

23. The Court has reviewed the financial situations of the parties. _____ [obligor] earned considerably more in _____ than they earn currently. While past support should be calculated based upon the parties' actual incomes, the Court is concerned that based on his current income _____ [obligor] will not have the ability to pay \$_____ in past support without endangering their ability to pay ongoing support. As a result, the Court finds that a downward deviation in past support from \$_____ to \$_____ is in the best interests of the joint minor child. Additionally, the Court finds that a past support payment of \$_____ per month is more affordable for _____ [obligor] than a past support payment of 20% of their ongoing child support obligation.

OR

24. _____ credibly testified that they received the following payments during the time period from _____ to _____ from _____ [obligor]:

- _____: \$_____
- _____: \$_____
- _____: \$_____
- _____: \$_____
- _____: \$_____
- Total voluntary payments: \$_____

25. From _____ through _____, _____ [obligor] voluntarily contributed \$_____ to _____ [obligee] for the support of the joint child. After the deduction of \$_____ from the amount owed of \$_____, _____ [obligor] owes the balance of \$_____ to _____ [obligee] for past support.

26. _____'s [obligor's] past support payments shall commence as of _____.

Sample Order:

1. The motion for past support is **GRANTED** as set forth herein.
2. _____ [obligor] owes the following amount as reimbursement for past support provided and judgment is granted² against _____ [obligor] as follows:
 - \$_____ [total past support amount] to _____ [obligee] for past support from _____ [start date] to _____ [end date] for the joint child.
3. Effective _____ [start date for payback usually start this at least one month in the future], _____ [obligor] must pay \$_____ [monthly payment] per month reimbursement for past support. This amount is instead of the 20% collected by Automatic Income Withholding, and no additional amounts shall be withheld by Automatic Income Withholding **as long as** _____ [obligor] **complies with the payment conditions set forth in** _____

² As noted in paragraph ____, judgment shall only be entered if _____ [obligor] fails to make timely payments of support and upon an Affidavit of Default filed by counsel for _____ [obligee].

this order. If _____ [obligor] defaults, the monthly reimbursement amount shall change from \$_____ [monthly payment] per month to be 20% of the ongoing child support obligation until reimbursement is paid in full pursuant to Minn. Stat. §§ 518A.53, subd. 10(a) and 518A.60(c).

4. Entry, execution, and interest on the judgment is stayed as long as _____ [obligor] remains current in the support obligation as set forth in this Order, beginning _____ [start date of past support payment].

Past Support Information Sheet

By: Marnie Zak, Margaux Soeffker & Karen Terese Kugler

Start Date of Past Support Time Period: _____

End Date of Past Support Time Period: _____

Date Petition Served: _____

Obligee Historical Income Information:

- Employer or Income Source: _____
 - Start Date: _____
 - End Date: _____
 - Hourly Rate: _____
 - Hours Per Week: _____
 - Gross Monthly Income: _____
- Employer or Income Source: _____
 - Start Date: _____
 - End Date: _____
 - Hourly Rate: _____
 - Hours Per Week: _____
 - Gross Monthly Income: _____
- Employer or Income Source: _____
 - Start Date: _____
 - End Date: _____
 - Hourly Rate: _____
 - Hours Per Week: _____
 - Gross Monthly Income: _____

Obligor Historical Income Information:

- Employer or Income Source: _____
 - Start Date: _____
 - End Date: _____
 - Hourly Rate: _____
 - Hours Per Week: _____
 - Gross Monthly Income: _____
- Employer or Income Source: _____

- Start Date: _____
- End Date: _____
- Hourly Rate: _____
- Hours Per Week: _____
- Gross Monthly Income: _____
- Employer or Income Source: _____
 - Start Date: _____
 - End Date: _____
 - Hourly Rate: _____
 - Hours Per Week: _____
 - Gross Monthly Income: _____

Obligee DEED or PRISM Wage Records

Time Period One:

- _____ to _____
- \$ _____
- _____ hours

Time Period Two:

- _____ to _____
- \$ _____
- _____ hours

Time Period Three:

- _____ to _____
- \$ _____
- _____ hours

Time Period Four:

- _____ to _____
- \$ _____
- _____ hours

Time Period Five:

- _____ to _____
- \$ _____
- _____ hours

Obligor DEED or PRISM Wage Records

Time Period One:

- _____ to _____
- \$ _____
- _____ hours

Time Period Two:

- _____ to _____
- \$ _____
- _____ hours

Time Period Three:

- _____ to _____
- \$ _____
- _____ hours

Time Period Four:

- _____ to _____
- \$ _____
- _____ hours

Time Period Five:

- _____ to _____
- \$ _____
- _____ hours

Past Support Issues Covered:

____ Past Basic Support

____ Past Child Care Support

____ Past Medical Support

____ Pregnancy & Confinement

Obligee's Nonjoint Children:

- _____, born _____
- _____, born _____

- _____, born _____
- _____, born _____

Obligor's Nonjoint Children:

- _____, born _____
- _____, born _____
- _____, born _____
- _____, born _____

Past Child Care Costs:

- Child Care Provider: _____
- Children Enrolled: _____
- Dates of Enrollment: _____
- Cost:
 - 202__: _____
 - Dates Enrolled in year _____
 - 202__: _____
 - Dates Enrolled in year _____
 - 202__: _____
 - Dates Enrolled in year _____
- Child Care Provider: _____
- Children Enrolled: _____
- Dates of Enrollment: _____
- Cost:
 - 202__: _____
 - Dates Enrolled in year _____
 - 202__: _____
 - Dates Enrolled in year _____
 - 202__: _____
 - Dates Enrolled in year _____
- Child Care Provider: _____
- Children Enrolled: _____
- Dates of Enrollment: _____
- Cost:
 - 202__: _____
 - Dates Enrolled in year _____
 - 202__: _____

