STATE OF CONNECTICUT, CHILD SUPPORT GUIDELINES COMMISSION MEETING

***These are draft minutes and have not yet been approved by the Commission**

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Minutes for the December 4, 2025, meeting held via Microsoft Teams. Agenda items are bolded.
Scribe: Gregory Bennett, DSS/OCSS

5:01pm – Call to order, provision for meeting minutes.

Roll Call

Present: CFSM Michael Ferguson, Chair, Graham Shaffer, Carolyn Signorelli, Darren Pruslow, Allison E Post, Cara Pavalock D'Amato, Michael Werner, Virginia Brown, and Susan Hamilton.

Not present: Campbell D. Barrett, , Gary Winfield, Amy Calvo MacNamara, Scott Storms.

Minutes from the October 2, 2025 meeting moved to adopt by Graham Shaffer and seconded by Carolyn Signorelli. Motion carried with Machael Werner abstaining.

5:06 pm – Receipt of comments on proposed regulation

Magistrate Michael Ferguson began the meeting by turning it over to Graham Shaffer to talk about the responses and the comments on the proposed regulations. Graham stated these were circulated a couple of weeks ago, these proposed responses to the public comments on the proposed regulations. Graham stated that there is not a set way in the Administrative Procedures Acts in Connecticut on how agencies or commissions have to do this, but he finds it easiest to do it this way where you kind of compartmentalize the comments and the different topics and respond to them that way, which is what he has done here. He stated that this is consistent with the way you will see federal agencies typically do notice and comment rulemaking. He stated that he is here to open up the floor to the members to see if they have any recommendations for this draft response. He stated as you go through it, you'll see we really didn't recommend making any changes to the proposed regulation based on the comments we received. Graham stated we received just a couple of written comments, some of which came from support enforcement services and then the comments that you guys all witnessed at the two public hearings that we held on the proposed regulations. Graham stated that he is here to listen to the feedback if there is any, and if there are any changes you think are necessary, we can document that now, Caroline.

Caroline Signorelli stated that she has been just quickly reading through these and apologized she didn't get a chance to look at them sooner. She stated that the only comment she has so far is the response to #4 where it starts out "unfortunately" she would just take that out to not use any kind of editorializing to bait the particular person. Graham Shaffer stated that we can remove that, and he will look through and see if there was any more sort of editorializing along those lines too and remove that. Graham then asked if anybody else had any thoughts. He stated that he did have a margin comment about the language in comment #10. He stated that you know as often happens, you're drafting stuff, and you look at it 17 times and you settle on language and then go back to it months later and you read it again and you're like, is this as clear as it could be? Graham stated he put some alternative language, possibly saying the exact same thing in a little bubble there. He stated he thinks it's probably clear enough the way that it's currently written to be perfectly honest. He stated that the commenter was concerned in this one that it wasn't clear what was meant by dependency benefits, but he thinks the language is pretty clarifying. He stated he thinks the commenter wanted to cross

reference back to the worksheet instructions where dependency benefits are previously mentioned and there is already a cross reference in there. Graham stated that he didn't feel compelled to necessarily make any changes based on this one, but if you guys do think the language in the bubble comment is more clear he would be happy to make that update. He stated beyond that he thinks there was nothing that warranted any kind of changes but is open to disagreements. Darren Pruslow stated he is going to echo some agreement while people are reading and that he did have a chance to read. He stated that he thought it was well drafted, and he doesn't disagree with what #22 really says about unfortunately. He stated that's a style thing, but he thinks that makes sense. Darren stated otherwise he thinks its spot on and thanked Graham for doing the Herculine chore of putting that all together in such a thoughtful and organized way. Carolyn Signorelli agreed and stated good job. Magistrate Ferguson echoed what Darren stated and said he had the opportunity to read it and saw the draft as well and he did a great job but does agree with Attorney Signorelli to take that "unfortunately" out.

5:06 pm – Next Steps in the Rule Making Process

Darren Pruslow asked if Graham was going to be doing the whole preamble too and Graham Shaffer stated that he hopes not. Graham stated he candidly doesn't know when that preamble has been done in the past because it is not technically part of the reg. He stated that he suspects that at the end of the process, before they sort of adjourn, the Commission put the preamble together after they were. Graham stated technically we won't know what the final language is going to be until we get it approved by the Regulations Review Committee. He stated that maybe they already started working on that stuff at this phase but he kind of thinks they probably did it at the end of their process when they knew what the final version of the reg was going to look like before the Judicial Branch published the updated packets with the updated regs. Graham asked if there were any thoughts on how you want to handle that preamble. He stated we have the previous versions too and what they seem to do really is literally go through subsections by subsections and say we decided to make no change to this and then when they did make a change they sort of explained the change that they made which he thinks will be more important in some places than in others for us. Darren Pruslow stated that we are going to have some downtime between now and then so it might behoove us to get a head start on it while we can. He stated that it will be a very quiet session for Representative Pavalok and there will be nothing going on in Hartford at all. Darren stated that he agrees that the process of maybe taking what was there and adding as needed but maybe at least thinking about what we can do this meeting and be flagging different sections that mayb4e some of us will take a run at just so we can start the process. He stated obviously it needs to be approved but if we can be ahead of the game he would love for this to get out and finalize sooner than later because he does agree with the one comment that this is not the fastest process and it doesn't hurt to get this done. He stated getting this done would be great and whatever we can do to possible help that might be good.

Graham Shaffer stated maybe even a suggestion is that we assign the preamble work to go sort of section by section and if you have maybe each member can shot me, Magistrate Ferguson, and Darren an email between this meeting and the next, which is going to be early February, and let us know here are the provisions on the sections I am interested in working on and we can ensure that there's coverage with maybe like 3 attorneys or 3 members for each sections and just start drafting it. He stated then he will publish the response to comments on the regulation system along with what's known as a notice decision that he circulated too that just expresses its required. Graham stated the document just expresses the Commissions intent to move forward with the proposed regulation that will then go to the Office of the Attorney General where they will conduct a

legal sufficiency review. He stated that it's not policy oriented, it's like has the Commission exceeded their statutory authority somewhere in this proposed regulation, or is it in conflict with state or federal law? He stated they do that review and then it comes back to us to make any changes that are necessary and then we can send it off to the reg review at that point. Graham stated Legislative Regulations Review Commission and that Commission well need to send them a cover letter outlining the proposed regulation and they will schedule it for hearing usually 30 or 45 days after we send them over. He stated then we will have a hearing, and they can approve the just the proposed regs as is, they can reject them with prejudice, which is something that they're not going to do here. He stated that we've got a statutory obligation to do these regs so he doesn't think they're going to require us to go back to the drawing board, but they could approve them with the technical changes where we would come back, make what really amounts to stylistic or technical and then we can move the process forward. He stated that they might reject them without prejudice which means they have some substantive concerns. Graham stated they have some questions and some changes that are more than technical they want us to make so we would have to come back, make those changes, send it to the Attorney General's office again for a review, and then it goes back to the regs review. He stated we could be just a few months away from being done with this, or depending on what happens at the regs review, it could be a more extended process.

Cara Pavalock asked are we only doing regs or is there any statutory changes. Graham stated no this is just all regs, as you know there are some statutory changes in the Child Support Program, we are seeking to pursue but we can't do that here. Cara stated that she is not on the regs review so she is not sure what that process is, and she just knows when the deadline is in early February. She then asked are we addressing every topic that we raided but didn't change? Graham stated he will recirculate the previous versions. He stated that at the very beginning of this, Lucy Potter who at the time was the only attorney who was on the Commission at the start of our process, had circulated a few years' worth of like a few iterations of the guidelines, including the preambles from the past commissions. He stated that the way he remembers it is they go basically subsection by subsection thought the entire guidelines and say here is what the provision does, we feel like its working well, we made no changes, we thought about changing this but we decided not to and here's why, or we did make a change and here's why we made the change and here's what we think it means. Graham stated that he doesn't think that there is anything that prescribes that level of detail but it's what's always been done in the past so it's up to the commission to decide. He stated that it does seem a little overkill to just go through subsection by subsection every year and say this what this provision does, and we didn't make any changes because we think it's working well. Cara Pavalock stated that she thinks that is helpful to know some of the topics that we considered and really looked into, but just ultimately it wasn't, and we didn't make any changes for whatever reason. Graham stated that is helpful for future Commissions to the extent they're going to be like our where a bunch of new people were coming into it, because if for instance if you do go back and look at some of the ones that previous commissions that Lucy had circulated they talk about shared parenting and all the concerns that the Commission had at the time of the shared parenting formulas. Graham stated he thinks some of those concerns probably were still shared this year, this Commission. Magistrate Ferguson stated he thinks we need to cover every topic because he thinks that is what happened in the past and to go forward because like you just said, next time there will be a different Commission. He stated if we just skip certain sections, they won't know exactly what happened, so we need to look at all of them. Magistrate Ferguson stated he thinks it's a good idea, we are skipping around but everyone could look at the preamble, take a section, email the three of us, and then we can determine. He stated that we are not going to meet in January and typically we don't meet in January anyway because it's the first week so the next meeting will be February.

He stated that it will give us something to work towards for the next two months because then otherwise we have two months of downtime.

Magistrate Ferguson stated he did not hear any changes other than the suggestion from Attorney Signorelli which we all agreed we should do. He then asked, “do we have to vote on this”? Graham Shaffer stated he thinks that’s the way he would handle this, have the Commission vote to approve the draft proposed responses. Magistrate Ferguson stated that he’ll entertain a motion to accept and approve the draft comments on the proposed regulations from the people that commented on the regulations. Graham Shaffer moved to adopt the proposed responses to the comments that were received by the Commission with one change in response #4 which is to delete the word “unfortunately”. Darren Pruslow seconded the motion. Magistrate Ferguson stated hearing none opposed, the motion carries.

Graham Shaffer stated the one thing he would say is that once we get past the Attorney General’s review, he’ll draft a cover letter to send to the Regulation Review Commission. He stated they will schedule a hearing on the proposed regulation, and he does not know at this point they were doing all of those remotely during COVID. He stated he has not had one in a while, so he doesn’t know if they’re doing those entirely in person now but offering a remote option for agencies that are coming before them. He stated that we’ll just get that hearing scheduled and he would just ask that anyone who can attend the hearing from the Commission be there because you never know what you’re going to get when you go to those. Graham stated that sometimes he has gone in and there’s something were doing somewhat controversial and there is no questions whatsoever and then other times he’s got a very benign change to a regulation and grilled and would want to have some other Commission members there to help explain the Commission’s thought process on certain things, and to sort of like voice, like a unified voice on why we did what we did. Graham stated as soon as he knows what the date of that hearing is he will circulate it and realize that some people are going to be in court. He stated for anyone that can, it would be very helpful to have as many Commission members there as possible. Magistrate Ferguson stated the next step is then Graham is going to draft a document and send it over to the Attorney General’s Office and wait for them to get back to us and set up a hearing. Graham Shaffer stated he thinks they have 30 days to do their review, and then once that is complete, that’s when we’ll move towards the General Assembly and the regs review process.

Magistrate Ferguson stated the next meeting will be February 5, 2026 at 5:00pm

5:21pm – Adjournment