

**Modification of Child Support Orders:
Substantial Change of Circumstances**

Changed Circumstances	Sufficient?	Case Law and Statutory Basis
Substantial increase or decrease in child's needs or parent's child-related expenses.	Yes	Gilmore (1979); Greer (1991); Davis (1991); Craig (1988) (increase); Koufman (1991) (decrease).
Child is older.	No	Waller (1974).
Inflation; increased cost of living.	No	Holder (1987).
Change of custody.	Yes	Kowalick (1998); Spencer (1999).
Child is receiving public assistance.	Yes	Cartrette (1985).
Child is emancipated, is at least age 18 and has finished elementary or secondary school or is not making satisfactory progress in school, or is 20 years old.	Yes	Brooks (1999); GS 50-13.4.
Equitable distribution order entered.		GS 50-20(f).
Substantial involuntary reduction in parent's income.	Yes	Pittman (1994), McGee (1995), Padilla (1995) (obligor's income); Bishop (1957) (obligee's income).
Voluntary reduction in parent's income.	No	Goodhouse (1982); Askew (1995); Mittendorff (1999) (obligor); Schroader (1995); cf. Wachacha (1978), O'Neal (1984), Hammill (1995), Spencer (1999) (obligor); Wiggs (1998) (dicta).
Voluntary reduction in parent's income and change in child's needs.	Yes	Schroader (1995) (obligee); Mittendorff (1999) (obligor).
Substantial increase in parent's income.	No	Fuchs (1965), Waller (1974), Greer (1991), Thomas (1999) (obligor's income).
Parent's remarriage or responsibility for support of other children.	No	Gilmore (1979); Dishmon (1982).
Child support order is at least three years old and amount of support under order is at least 15% more or less than amount of support payable under the child support guidelines.	Presumed	Child support guidelines; Garrison (1996).
Child's medical emergency.		Nantz (1994).