

**Northrop v. Nevada, Div. of Welfare and Supportive Services, No. 64589, ORDER OF REVERSAL AND REMAND (Unpublished Disposition May 26, 2016)  
SC UNPUB**

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Child support Master reduced Northrop's child support to \$0 while he was incarcerated but prospectively increased it to \$100 per month once he was released from prison.

The court master's recommendation was not based on Northrop's gross monthly income at the time of the January 2013 hearing as defined by NRS 125B.070(1)(a). Instead, the recommendation was presumably based on the court master's projection of Northrop's gross monthly income upon the unspecified future date of his release from prison, though the court master made no findings as to Northrop's future ability to secure employment.

Since child support can be modified at any time when there are changed circumstances, Northrop can argue at the time of his release that circumstances have not changed and thus, child support should not be modified.