

# Voluntary Reduction of Child Support Income: When Does an Economic Self-Improvement Plan Preclude Income Attribution?

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Parents have a legal obligation to financially support their children through majority, usually 18 years of age. Importantly, this obligation does not end with divorce. The custodial parent is presumed to fulfill this obligation. The noncustodial parent's obligation (*i.e.*, child support) is determined by the state having jurisdiction and is driven largely by the parent's income. Given this proposition, it is not uncommon for parents to intentionally reduce (or manipulate) their reported income in an effort to minimize a child support judgment.

To contend with income manipulations, every state has a provision (or supporting case law) allowing the court to attribute income to a parent it finds is voluntarily unemployed or underemployed.<sup>1</sup> And, of course, all states have exceptions to their attributed income provisions. One such exception, and the focus of this discussion, is the proposal that an underemployed parent is pursuing a plan of economic self-improvement that (arguably) will trickle down to the children.

This discussion is timely and significant. Moreover, it is motivated by recent engagements and my own search for guidance. I've organized this article as follows. First, I present an overview of child support, specifically the concept of guidelines and the significance of measuring income. Second, I present a brief discussion of attributed income and summaries of a sampling of court opinions. Third, I explore the proposition of a plan for economic self-improvement as an exception to attributed income. Fourth, I operationalize our discussion with an illustrative case study that addresses economic self-improvement *via* self-employment. Finally, I conclude with comments and cautions.

## DETERMINING CHILD SUPPORT

In 1984, the federal government (*via* amendments to the Social Security Act to promote welfare reform) enacted the Child Support Enforcement Amendments (Pub. L. 98-378) which, among other things, required states to establish advisory guidelines for determining child support. In 1988, through the enactment of the Family Support Act (Pub. L. 100-485), the federal government *required* each state to develop and maintain<sup>2</sup> clearly defined *presumptive* (vs. advisory) guidelines. In other

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words, the established guidelines create a rebuttable presumption that the amount of an award is the correct amount. Thus, to deviate, a court must make a specific finding that a guideline award is “unjust or inappropriate.”<sup>3</sup>

Child support guidelines, as implied, provide a framework that facilitates uniformity and transparency for the way (variables and procedures) a child support obligation is determined. The objective is a determination that provides for the reasonable needs of the child for care, health, and education within the limits of the parents’ ability to pay. Although state guidelines vary, federally mandated minimum requirements include:

- (1) the consideration of all earnings and income of the noncustodial parent;
- (2) descriptive and numeric criteria; and
- (3) the consideration of the subject children’s health care costs.

**Three Models**

- To that end, state guidelines are generally developed around one of the three following models: **Income shares model** (40 states, Washington, DC, and Guam). This model calculates an award by prorating the required support, as determined by the court,<sup>4</sup> between the parents based on their combined incomes and the noncustodial parent’s percentage thereof.

For example, if the court determines a child needs \$750 per month, and total parental income is \$6,250 per month (custodial parent’s income of \$2,083 plus noncustodial parent’s income of \$4,167), the noncustodial parent will be ordered to pay \$500 per month (2/3 of \$750). The custodial parent’s obligation (\$250) is presumed to be spent on the child. Additional factors impacting an award may include daycare, special needs, and insurance.

- **Percentage of obligor’s income model** (Eight states). This model calculates an award based only on a percentage of the noncustodial parent’s income and the number of children being supported.

For example, in Illinois the current statutory guidelines of child support are as follows:

# of Children	% of Noncustodial Parent’s Net <sup>5</sup> Income
1	20
2	28
3	32
4	40
5	45
6 or more	50

Thus, a noncustodial parent with net monthly income of \$5,000 and one subject child would be ordered to pay \$1,000 per month. The guidelines in the chart are applied to each case *unless* the court makes a finding that the amount is inappropriate after considering the best interests of the child.

- **Melson Formula**<sup>6</sup> (Two states). This formula is a deviation of the income shares model, with additional considerations for minimal parental self-support and a standard-of-living allowance (SOLA).<sup>7</sup> Like the income shares model, an award (basic support plus SOLA) is prorated between the parents based on the respective income of each, as a percentage of their combined income.
- This model has eight basic steps, as follows:

Step	Action
1	Determine the income of each parent (generally after-tax).
2	Reduce each parent’s income (Step 1) by a self-support needs reserve (provided by the court, for example, \$500 per month).
3	Determine combined parental income and each parent’s respective contribution (as a percentage).
4	Determine the child’s primary support needs (provided by the court, generally based on the parents’ combined net income).
5	Determine work-related child expenses or special needs.
6	Determine the SOLA (provided by the court).
7	Determine the total support obligation (Step 4 + Step 5 + Step 6).
8	Allocate the support obligation by each parent’s contribution percentage (as determined in Step 3).

Regardless of the underlying model, all state guidelines require an accurate determination (or measure) of income.<sup>8</sup> Although a minority (eight states) focus only on the noncustodial parent's income, the majority (42 states) require the consideration of both parents' incomes.<sup>9</sup> Thus, the influence of parental income on child support drives a motive to intentionally reduce (or manipulate) reported income.

**Special Note:**

*The determination of income is greatly complicated when it includes income from a closely held business, for example, a sole proprietorship, corporation, or limited liability corporation, collectively referred to herein as self-employment. As implied, a closely held business is owned and operated by a limited number of owners who are in a position to control the activities, transactions (e.g., wages paid), and reporting. Income from self-employment is generally determined by subtracting all ordinary and necessary business expenses from gross receipts. Although state guidelines vary, many provide for the averaging of self-employment income to adjust for startups and business cycles. Averaging periods vary from the start of a business up to 36 months.*

*Importantly, self-employment presents many opportunities for income manipulation, from the determination of gross receipts (what is reported and when) to the deduction of expenses (business vs. personal / ordinary and necessary). Although presented under penalties of perjury, income tax returns may not be credible or represent economic reality.<sup>10</sup>*

**ATTRIBUTED INCOME**

To contend with parents' efforts to manipulate their income to avoid child support, every state has a provision (or authority in case law) allowing the court to attribute income. Attribution of income is a legislative invention that provides the court an alternative to reported earnings, when it determines a parent is *voluntarily* unemployed or underemployed.<sup>11</sup> That said, a voluntary reduction of income may or may not be motivated by a child support order. Examples of other motivations include early retirement and change in

employment for personal satisfaction or future economic gain.

Attributed income is commonly defined as earnings parents should have earned (*i.e.*, probable income) had they diligently pursued reasonable employment opportunities, or reasonably utilized, applied, or invested their assets.<sup>12</sup> Factors often considered by the courts when attributing income include, but are not limited to, the parent's education, training, work history, occupational qualifications, and employment potential.

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*The guideline creates a rebuttable presumption.*

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As a contribution to our understanding of voluntary reductions and attribution, the following summaries of judicial opinions are presented:

Melinda H. v. William R., 230 W. Va. 731, 2013 W. Va. LEXIS 385 (W. Va. 2013)

*Opinion*

*Family court erred in failing to attribute earnings to the father based upon his previous income. Father's decision to leave his former employment and go to work for a new employer for less pay was not reasonable [emphasis added]. Importantly, the father failed to present a plan (e.g., objective evidence) to support his argument that, within a reasonable time, his action would result in an economic benefit to his children.*

**Special Note:**

*The terms "reasonable" and "reasonable time" are relative to a specific set of case facts and circumstances as weighted by the court. In other words, what's reasonable in one case may not be reasonable in another. Importantly, in the context of child support, the measure of reasonableness must be focused on the needs of the children as compared to the ambitions (or perceived needs) of the parents.*

DCSE v. R. D. K., 2004 Del. Fam. Ct. LEXIS 2 (Del. Fam. Ct. 2004)

*Opinion*

*When a father left his former employment, based on his reasonable assumption that he would be*

employed under a new job offer, which was subsequently revoked after he resigned from his former job, he did not voluntarily lose his job. Thus, the father's current pay represented his earning capacity. The father's actions were in good faith.

### Special Note:

This opinion motivates the question of what constitutes a reasonable period of unemployment or underemployment following an involuntary termination. Must the parent be actively participating in the workforce (seeking improved circumstances)?

Mathias v. Mathias, 2009 N.J. Super. Unpub. LEXIS 2064 (App. Div. Unpub., 2009)

#### Opinion

Family court erred in attributing income to the mother who quit her teacher's aide position to attend nursing school on a full-time basis, during which time she worked part-time as a waitress and home health care aide. Mother presented evidence regarding time demands of her studies, work, school, and parenting obligations. The Superior Court concluded the actions of the mother were reasonable and in good faith even though she earned less than she was capable of.

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*States vary in using gross or net income.*

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### Special Note:

Again, reasonable is a relative term that must be focused on the needs of the children as opposed to the ambitions (or perceived needs) of the parents.

MENSER v. DCSE, 1999 Del. Fam. Ct. LEXIS 74 (Del. Fam. Ct., 1999)

#### Opinion

Father, who was self-employed, was not entitled to a reduction in child support because his business was not generating the income he could have earned working for someone else. Reasonable earnings were properly attributed to the father.

### Special Note:

The court weighted the credibility of the business books and records and the father's good faith argument against the current needs of the children, concluding the business income, as reported, was not reasonable. As discussed previously, the determination of income is greatly complicated when it includes income from self-employment. The business owner controls what's reported, what's deducted and when.

The courts rightfully consider good faith arguments with skepticism, specifically the motive for the voluntary reduction of earnings (child support or other) weighted against the need to protect the support beneficiaries.<sup>13</sup> Armed with the previous context, we now consider the good faith argument of a plan of economic self-improvement.

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*Self-employment provides opportunities for income manipulation.*

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## PLAN OF ECONOMIC SELF-IMPROVEMENT

A parent's voluntary reduction of income is commonly defended by an argument of economic self-improvement.<sup>14</sup> As the name implies, economic self-improvement is an enhancement (or upgrading) of one's financial condition (or status) through one's own efforts. A plan, of course, is a set of actions for achieving an end. Thus, a plan of economic self-improvement is simply a strategy (e.g., education, training, or self-employment) proposed to improve one's economic condition, which (arguably) will trickle down to the children. That said, let's consider the specific components of the argument: claim, reasons, evidence, and justification.

### Claim

Although voluntarily underemployed, the court should not attribute income to the parent.

### Reasons

The parent is pursuing a good-faith plan of economic self-improvement which, within a

reasonable period of time, will result in economic gain to the children. Moreover, the expected economic gain to the children (as a byproduct of the parent's gain) will be greater than the expected losses (short-term reduction in support).

### Evidence

The argument should be supported by sufficient relevant data which, of course, is relative to the parent's specific plan. Let's reconsider the 2009 case of *Mathias v. Mathias* (introduced previously):

- Ms. Mathias quit her teacher's aide position (voluntary reduction) to attend nursing school on a full-time basis.
- As a teacher's aide, Ms. Mathias earned \$17,748.
- Ms. Mathias presented objective wage data regarding her future earnings capacity as a nurse (\$52,790).
- Ms. Mathias presented direct testimony regarding the time demands of her studies, work, school, and parenting obligations.
- Ms. Mathias presented third-party testimony regarding the time horizon (24 months).

### Justification

A parent's improved financial condition (or status) will reasonably trickle down to the children.

### Special Note:

*An important and persuasive form of evidence often overlooked is an impact analysis (IA). As implied, an IA quantifies the consequences of a parent's proposed plan on the support beneficiaries (short term and long term) relative to attributed income. An example is provided in the following case study. Although not employed in the Mathias case, an IA does not support the court's decision.*

### CASE STUDY: ECONOMIC SELF-IMPROVEMENT VIA SELF EMPLOYMENT

This case study, which is based on an actual case,<sup>15</sup> is presented to operationalize our discussion

and provide a targeted approach to evaluate a voluntary reduction in earnings, arguably supported by a plan of economic self-improvement.

### Case Narrative

Sam (age 40) and Cindy (age 34) were married in June of 2008 and divorced in July of 2012. The parties had two children, Nick, age four, and Robert, age six. Cindy was the custodial parent and worked as a stay-at-home mother since Robert's birth. Sam is a CPA and has worked in public accounting (tax and small business) for 15 years. Based on his latest wage earnings of \$125,000, Sam was ordered to pay monthly child support of \$1,565.

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*Courts consider good faith arguments with skepticism.*

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Shortly following the divorce (in December 2012), Sam voluntarily resigned his tax manager's position with the CPA firm to own and operate a boxing club franchise (The Ring). Sam's investment in the boxing club was \$225,000, which was funded by his distribution of the marital estate. Sam organized the new business as a single-member limited liability company (LLC). As such, his net income is reported as self-employment income on Schedule C of his personal income tax return (Form 1040). Sam reported operating net income from the business of \$33,437 for 2013 and \$47,214 for 2014.

### Petition for Modification<sup>16</sup>

In May of 2015, Sam filed a Petition for Modification of Child Support due to a change in circumstances, that is, reduction of income. Sam's Petition was based on the argument that he is pursuing a plan of economic self-improvement, which will result, within a reasonable time, in an economic benefit to his children. In support of his argument (claim), Sam presented the expert witness testimony of CPA Jones.

### Direct Examination of CPA Jones (the Husband's Expert)

- The franchise is one of the fastest growing franchises on the market, No. 22 on the list of *Entrepreneur Magazine*, with more than 500 sold nationwide.

- Offerings include group boxing, kickboxing classes, personal training, self-defense classes, and retail sales of apparel and equipment.
- The business is well-organized and controlled *via* a system of checks and balances.
- Profits realized in 2013 and 2014 exceeded expectations.
- Projected growth for 2015 to 2017 (35 percent, 30 percent, and 25 percent) and 2018 forward (15 percent) seems well-reasoned given current competition and demographics.
- Sam is pursuing a viable plan of economic self-improvement that would result, within a reasonable time, in an economic benefit to the children.

### The Argument Unfolds: Cross-Examination of CPA Jones

- CPA Jones *does not* accept that a plan of economic self-improvement requires making more money than previously earned (*i.e.*, \$125,000). His opinion is that a plan of self-improvement implies an improved quality of life, which includes, but is not limited to, income.
- CPA Jones acknowledges Sam's Petition is based on an "economic plan of self-improvement."
- CPA Jones believes Sam is enjoying the advantages of being self-employed, such as control (own boss), reduced politics and drama, and he "eats what he kills" (no profit sharing). These rewards have value but are difficult to quantify.
- CPA Jones relied on Sam for all historic and prospective data; he did not test, review, or compile the data because Sam is a CPA.
- CPA Jones relied on Sam regarding demographics and competition; he did no research.
- CPA Jones acknowledges that projections are estimates that may, or may not, be realized.
- CPA Jones did not attempt to quantify the level of business activity required to match the wage income (\$125,000) previously earned by Sam as a CPA.
- CPA Jones cannot state, within a reasonable degree of certainty, when the children will enjoy a greater economic benefit.
- CPA Jones is not familiar with the concept of an impact analysis and was not engaged to do one.
- CPA Jones disagrees that Sam is risking a portion of his children's current needs to fund the business venture.

### Testimony of Opposing Expert (for the Wife)

- A plan of economic self-improvement is a proposed strategy that will result, within a reasonable time, in a greater economic benefit to the children.
- Based on the data provided by the Petitioner (without adjusting for risk), the proposed plan *will not*, within a reasonable time, result in an economic benefit to the children.
- The expert's impact analysis was presented to the court. (*See Impact Analysis in Appendix 1.*)

### Special Note:

*For the purposes of our illustration, I employed a future growth rate of 15 percent, which provides for continual (annual) consideration by the court. Alternatively, the custodial parent (e.g., Cindy) must monitor her husband's business affairs and rely on the credibility of his representations, filing Petitions for Modification when a substantial change (15 percent) is identified (or suspected).*

### Discussion

This case study brings our discussion full circle. Specifically, must a voluntary reduction of income be economically motivated, and objectively evidenced, to avoid attribution? As discussed previously, a claim of economic self-improvement is made complicated when the employment choice is self-employment, and even

more complicated when conflicting expert testimony is presented.

As illustrated, our challenge was focused on three issues:

- (1) motive for the voluntary reduction of income;
- (2) the reasonableness of the plan; and
- (3) establishment (or not) of the argument that reductions in current support will (or will not) be offset with future economic gains.

This approach is framed by the underlying proposition that the Petitioner has the burden of justifying his or her action.

That having been said, I submit that a reasoned plan of economic self-improvement should present the following:

- (1) The promise of future *economic* improvement, that is, income greater than currently earned;
- (2) A reasonable period (time horizon) as to *when* the improved economic benefit will be realized by the children;
- (3) Reasoned and objective data in the development of projected future benefits; and
- (4) An impact analysis, supporting the argument that the short-term reductions in support will be offset by the expected future benefits.

Embodied in these recommendations is a good faith test. In other words, the action (voluntary reduction of income) *must not* be motivated by the elimination or reduction of child support.

## CONCLUSION

During the course of my career, I've been engaged to participate in arguments on both sides of this issue. Specific concepts such as motive, reasonable time, and improved economic benefit are subjective (good faith) arguments that must be measured by objective facts.

As an *academic*, it's difficult not to embrace an argument that additional education (or training) is anything other than a plan of economic self-improvement. However, when objectively

measured (*i.e.*, impact analysis), it may well be established that the decision is not reasonably calculated to ensure (or improve) the economic well-being of the children to whom the parent owes an immediate duty of support.

As an *entrepreneur* (and CPA), it's difficult not to embrace an argument that a new business startup (*e.g.*, self-employment) is anything other than a plan of economic self-improvement. The question is for whom: the parent or the child?

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*An IA qualifies the consequences of a proposed plan.*

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In closing, I submit that we must be cautious (or better yet skeptical) when evaluating a parent's claim of economic self-improvement, especially when it involves self-employment. I cannot over-emphasize the need (and value) for critical thinking, reasoning, and objective evidence.

## RESOURCES

Child Support Calculators. Available at: <http://www.alllaw.com/calculators/childdsupport>, last accessed Jan. 14, 2016.

Child Support Guideline Models by State. National Conference of State Legislatures. Available at: <http://www.ncsl.org/research/human-services/guideline-models-by-state.aspx>, last accessed Jan. 14, 2016.

Illinois Child Support: Calculating Obligations. Available at: <http://www.childdsupportillinois.com/general/calculating.html>, last accessed Jan. 14, 2016.

Noyes, J. L. (2011). "Child Support Models and the Perception of 'Fairness'." Institute for Research on Poverty, University of Wisconsin—Madison. Can be found at: <http://www.irp.wisc.edu/research/childdsup/cspolicy/pdfs/2009-11/Task6-CS2009-11-Noyes-Report..pdf>, last accessed Jan. 14, 2016.

## NOTES

1. As a rule, attribution of earnings is not considered when the reduction of earnings is involuntary.
2. Every four years, the states are required to review their existing guidelines to ensure appropriate child support determinations.

3. Family Support Act of 1988, Sec.103. Available at: <http://www.irp.wisc.edu/publications/focus/pdfs/foc114e.pdf>, last accessed Jan. 14, 2016.
4. Generally determined as a percentage of the parents combined income and number of children.
5. Although states vary in using gross (pre-tax) or net (after-tax) income, Illinois uses after-tax income.
6. Named after Judge Elwood F. Melson of the Delaware Family Court and fully explained in *Dalton v. Clanton*, 559 A.2d 1197 (Del. 1989).
7. SOLAs are intended to reflect the standard of living the child would have experienced as a family unit.
8. Income generally includes all earnings unless exempt, for example, wages, interest, capital gains, dividends, rents, royalties, gifts, prizes, trust income, Social Security benefits, retirement income, preexisting alimony, and self-employment income. Faerber, P. (1999). "Empirical Study: A Guide to the Guidelines: A Longitudinal Study of Child Support Guidelines in the United States." *Journal of Law & Family Studies*.
9. Research indicates that the trend is a shift to the income shares model, which promotes a perception of fairness (e.g., contributions of both parents) and easily allows for changes in parenting arrangements (e.g., shared custody).
10. Seventy-two percent of IRS small business audits resulted in additional tax. See 2014 *IRS Data Book*. Available at: <http://www.irs.gov/uac/SOI-Tax-Stats-IRS-Data-Book>, last accessed Jan. 14, 2016.
11. Courts are mixed regarding attribution of income and involuntary reductions resulting from the wrongful acts of the parent, that is, criminal act resulting in incarceration.
12. For example, WV Code §48-2-205(a). WV Code §48. Domestic Relations. Available at: <http://www.legis.state.wv.us/wvcode/code.cfm?chap=61>, last accessed Jan. 14, 2016.
13. Although some states currently disregard all good faith arguments if a reduction of earnings is voluntary, the trend is toward an intermediate test in which the rights of the parent are balanced against the obligation to the support beneficiaries.
14. Becker, L. (1997, Winter). "Spousal and Child Support and the 'Voluntary Reduction of Income' Doctrine." *Connecticut Law Review*, 29, 647.
15. Case facts have been changed to protect the parties.
16. A Petitioner (e.g., Sam) must show a substantial change in circumstances to advance a Petition for Modification. With respect to income, the change must be at least 15 percent.

<b>Appendix 1 Petition for Modification Sam X vs. Cindy X Impact Analysis</b>													
<b>Children/Age</b>													
	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>12</b>	<b>13</b>	<b>14</b>
<b>Robert</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>12</b>	<b>13</b>	<b>14</b>	<b>13</b>	<b>14</b>
	<b>Actual</b>						<b>Projected</b>						
	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>		
A Growth		41.2%	35.0%	30.0%	25.0%	15%	15%	15%	15%	15%	15%		
B Self-Employment Income	33,437	47,214	63,739	82,861	103,576	119,112	136,979	157,526	181,155	208,328	239,577		
Self-Employment Tax @ 7.6%	(2,541)	(3,588)	(4,844)	(6,297)	( 7,872)	(9,053)	(10,410)	(11,972)	(13,768)	(15,833)	(18,208)		
Net Income (Annual)	30,896	43,626	58,895	76,563	95,704	110,060	126,568	145,554	167,387	192,495	221,369		
Moving 24-Mo. Avg. Monthly Income		\$ 3,105	\$ 4,272	\$ 5,644	\$ 7,178	\$ 8,573	\$ 9,860	\$ 11,338	\$ 13,039	\$ 14,995	\$ 17,244		
C Modified Child Support			\$ 853	\$ 1,025	\$ 1,212	\$ 1,377	\$ 1,514	\$ 1,662	\$ 1,797	\$ 1,934	\$ 1,934		
D Current Support		\$ 1,565	\$ 1,565	\$ 1,565	\$ 1,565	\$ 1,565	\$ 1,565	\$ 1,565	\$ 1,565	\$ 1,565	\$ 1,565		
Requested Change (Monthly)			\$ (712)	\$ (540)	\$ (353)	\$ (188)	\$ (51)	\$ 97	\$ 232	\$ 369	\$ 369		
Requested Change (Annual)			\$ (8,544)	\$ (6,480)	\$ (4,236)	\$ (2,256)	\$ (612)	\$ 1,164	\$ 2,784	\$ 4,428	\$ 4,428		
Cumulative											\$ (9,324)		
<b>Footnotes:</b>													
A Revenue growth rates provided by Sam.													
B Prior year's SE Income increased by growth rate.													
C Calculation of child support (income shares method - 2 children)													
D Calculation of child support with attributed income of \$125,000/yr. (\$10,416/mo.)													

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