

Future Expenses: A Necessary Component of Restitution

Criminal restitution is an order directing a convicted offender to provide financial recompense to victims for the consequences of his or her criminal conduct. The right to restitution is provided for by state constitutions and statutes, as well as federal statutes.¹ The modern practice of restitution arises out of a unique historical framework embodying compensatory and penological aims, including rehabilitation and deterrence.² The “primary and overarching goal” of restitution is “to fully compensate these victims for their losses and to restore these victims to their original state of well-being.”³ If victims are to be made financially whole and restored to their original state of well-being, restitution must be forward-looking; expenses resulting from defendant’s criminal conduct that occur subsequent to the crime—even well into the future—must be included in restitution orders. As one court has observed, “[m]any, if not all, of the categories of loss compensable as direct restitution include losses that are incurred after the occurrence of the crime, and which may continue to be incurred for a substantial period of time following a restitution hearing.”⁴ Future losses that should be factored into a restitution award include, for example, losses to future income, and future medical and counseling costs. Ordering restitution for such future expenses not only helps restore the victim but helps to ensure that defendants “confront concretely, and take responsibility for, the *entire* harm resulting from their acts.”⁵

When considering whether to order future expenses in restitution, jurisdictions tend to follow one of four approaches: 1) explicit provision for the recovery of either all or some future expenses in restitution laws⁶; 2) implicit incorporation of restitution for some future expenses by reference to civil standards of recovery that allow awards for future losses⁷; 3) in the absence of statutory authority, determine that at least some subset of forward-looking expenses is not recoverable in restitution⁸; or 4) in the absence of statutory authority, establish by case law that restitution is authorized for certain future expenses.⁹ Courts from many jurisdictions—including both those that have explicit statutory authority providing for future losses and those that do not—have held that restitution is appropriate for a range of future expenses, including future medical and mental health expenses,¹⁰ future lost income,¹¹ future child support,¹² and future moving expenses,¹³ among others.¹⁴

* View NCVLI's other legal publications at https://law.lclark.edu/centers/national_crime_victim_law_institute/professional_resources/ncvli_library/

A truly forward-looking approach also avoids the unfavorable practice of requiring victims to seek reimbursement from a fund into which defendant's restitution payments are deposited. Requiring reimbursement disadvantages victims who lack the financial means to make up-front payments and may result in victims' inability to obtain services for which restitution was ordered.¹⁵ Avoiding reimbursement-based restitution, when possible, also minimizes future infringements on the victim's privacy and avoids imposing judgment regarding how and when a victim chooses to address the impacts of a defendant's criminal conduct.¹⁶

It is only by requiring defendants to bear, up front, the full cost of the victims' losses resulting from their criminal conduct that the compensatory, deterrent, and rehabilitative aims of restitution can be met.¹⁷ If the criminal justice system is to be more than merely aspirational in its commitment to making victims financially whole and ensuring that defendants confront the full scope of the harm resulting from their criminal conduct, the full range of victims' future expenses must be included in restitution orders.

Practice Pointers

1. Think broadly when crafting requests for restitution to include all of a victim's future expenses.
2. Compile documentation to support a restitution request for future expenses early in a case. Such documentation may take the form of estimates or bids, affidavits or testimony by medical or mental health professionals, and actuarial analyses.
3. When collecting proof of future expenses, remain vigilant about victims' privacy, privilege, and confidentiality, particularly when crafting evidence submissions.
4. Seek a non-reimbursement-based payment plan for restitution.

¹ See generally *Fundamentals of Victims' Rights: A Summary of 12 Common Victims' Rights*, NCVLI Victim Law Bulletin (Nat'l Crime Victim Law Inst., Portland, Or.), Nov. 2011, available at <http://law.lclark.edu/live/files/11823-fundamentals-of-victims-rights-a-summary-of-12> (describing and citing to restitution provisions); *Fundamentals of Victims' Rights: A Victim's Right to Restitution*, NCVLI Victim Law Bulletin (Nat'l Crime Victim Law Inst., Portland, Or.), Nov. 2011, available at <https://law.lclark.edu/live/files/11821-fundamentals-of-victims-rights-a-victims-right-to> (same).

² See, e.g., Note, *Victim Restitution in the Criminal Process: A Procedural Analysis*, 97 Harv. L. Rev. 931, 933-34 (1984) (summarizing the historical roots of restitution); *People v. Hall-Wilson*, 505 N.E.2d 584, 585 (N.Y. 1987) (referencing the historical development of restitution and its beneficial function in "forc[ing] defendants to confront concretely – and take responsibility for – the harm they have inflicted") (citations omitted); see also NCVLI, *Fundamentals of Victims' Rights: A Victim's Right to Restitution*, *supra* note 1, at 1-2.

³ *United States v. Gordon*, 393 F.3d 1044, 1053 (9th Cir. 2004) (internal quotations, citations, and emphasis omitted). In accord with this purpose, many restitution provisions mandate full restitution for victims. See, e.g., 18 U.S.C. § 3664(1)(A) (requiring that "[i]n each order of restitution, the court shall order restitution to each victim in the full amount of each victim's losses as determined by the court and without consideration of the economic circumstances of the defendant"); 18 U.S.C. § 2259(b)(1) (mandating that restitution orders "shall direct the defendant to pay the victim (through the appropriate court mechanism) the full amount of the victim's losses as determined by the court . . ."); 18 U.S.C. § 1593(b)(1) (same); Ariz. Rev. Stat. Ann. § 13-603(C) ("If a person is convicted of an offense, the court shall require the convicted person to make restitution to the person who is the victim of the crime or to the immediate family of the victim if the victim has died, in the full amount of the economic loss as determined by the court and in the manner as determined by the court or the court's designee pursuant to chapter 8 of this title."); Ga. Code Ann. § 17-14-3(a) ("[A] judge of any court of competent jurisdiction shall, in sentencing an offender, make a finding as to the amount of restitution due any victim, and order an offender to make full restitution to such victim."); Haw. Rev. Stat. § 706-646(e) ("Restitution shall be a dollar amount that is sufficient to reimburse any victim fully for losses, including but not limited to . . ."). Other states do not explicitly require courts to order full restitution. See, e.g., Ala. Code § 15-18-67 ("[T]he court shall order that the defendant make restitution or otherwise compensate [the] victim for any pecuniary damages."); Me. Rev. Stat. Ann. tit. 17-A, § 1323(1) ("The court shall,

whenever practicable, inquire of a prosecutor, law enforcement officer or victim with respect to the extent of the victim's financial loss, and shall order restitution when appropriate."'). Still other state statutes permit courts to order less than full restitution. *See, e.g.*, Conn. Gen. Stat. § 53a-28(c) ("Restitution ordered by the court pursuant to this subsection shall be based on easily ascertainable damages for injury or loss of property, actual expenses incurred for treatment for injury to persons and lost wages resulting from injury. . . ."); La. Code Crim. Proc. Ann. art. 895.1(A)(1) ("The court shall order restitution in a reasonable sum not to exceed the actual pecuniary loss to the victim in an amount certain.").

⁴ *People v. Giordano*, 170 P.3d 623, 633 (Cal. 2007).

⁵ *People v. Kim*, 694 N.E.2d 421, 423 (N.Y. 1998) (emphasis in original).

⁶ *See, e.g.*, Alaska Stat. Ann. § 12.55.045(a) (specifying that the court shall order restitution, including restitution to the victim or another injured by the offense, or to an organization "that has provided or is *or will be providing* counseling, medical, or shelter services to the victim or other person injured by the offense") (emphasis added); Colo. Rev. Stat. Ann. § 18-1.3-602(3)(a) (providing that restitution "means any pecuniary loss suffered by a victim and includes but is not limited to all out-of-pocket expenses," as well as "anticipated future expenses," but excludes "loss of future earnings"); Wyo. Stat. Ann. § 7-9-103(b) (specifying that "the court shall consider and include as a special finding, each victim's reasonably foreseeable actual pecuniary damages that will result in the future as a result of the defendant's criminal activity"); Wyo. Stat. Ann. § 7-9-113 (providing for restitution for "long-term" care expenses).

⁷ *See, e.g.*, Miss. Code Ann. § 99-37-1(b) (defining pecuniary damages as "all special damages, but not general damages, which a person could recover against the defendant in a civil action arising out of the facts or events constituting the defendant's criminal activities and shall include, but not be limited to, the money equivalent of property taken, destroyed, broken or otherwise harmed, and losses such as medical expenses"); Or. Rev. Stat. § 137.103(2)(a) (referencing the civil damages provisions in tort actions when defining "economic damages" subject to restitution, but explicitly exempting "future impairment of earning capacity" from the scope of criminal restitution); Utah Code Ann. § 77-38a-102(6) (providing that pecuniary damages "means all demonstrable economic injury, whether or not yet incurred, which a person could recover in a civil action arising out of the facts or events constituting the defendant's criminal activities and includes the fair market value of property taken, destroyed, broken, or otherwise harmed, and losses including lost earnings and medical expenses, but excludes punitive or exemplary damages and pain and suffering").

⁸ *See, e.g.*, *State v. McKeeth*, 38 P.3d 1275, 1284-85 (Idaho Ct. App. 2001), *reversed on other grounds*, 103 P.3d 460 (Idaho 2004) (limiting restitution to when "a victim 'at the present moment' suffers out-of-pocket expenses" and reversing restitution order with respect to amounts not yet paid); *Creager v. State*, 737 N.E.2d 771, 779-81 (Ind. Ct. App. 2000) (finding that the trial court lacked the authority to order restitution for future lost child support as a result of the victim's death, as the relevant statute limited restitution for lost earnings to those amounts "before the date of sentencing"); *In re John M.*, 741 A.2d 503, 511-14 (Md. Ct. Spec. App. 1999) (interpreting a previous version of the restitution statute as precluding restitution for future counseling "expenses" that had not yet been paid by the victim); *State v. Fontaine*, 711 A.2d 667 (Vt. 1998) (vacating a restitution order for partial child support, as "child support orders are frequently modified to reflect changes in the financial circumstances of the obligor as well as fluctuations with respect to the needs of the minor children," where Vermont's restitution scheme "does not account or allow for future ambiguities" and encouraging the legislature to amend the statutory scheme to conform to the more flexible language employed by other jurisdictions).

⁹ Notably, one outlier jurisdiction does not fall in this schema and instead has taken a hybrid approach, limiting restitution orders to victims' out-of-pocket medical expenses to treat injuries, but extending the court's jurisdiction over defendants to allow for future modification of the restitution obligation to account for victims' additional expenditures up to ten years after sentencing. *See, e.g.*, *State v. Gonzalez*, 226 P.3d 131, 133-36 (Wash. 2010) (en banc) (holding as proper the amendment of a restitution order to include amounts paid for medical expenses, disability, and time loss, after defendant's original sentencing proceeding, as the statutory authority intended to allow restitution amounts to be increased during the period in which the court retains jurisdiction over defendant when "the State is not permitted to seek restitution for likely future medical costs or lost wages[.]" and observing that not allowing amendment to include additional expenses would "fundamentally undermine the purpose of the restitution statute where the victim is burdened with an ongoing serious injury[.]" but allowing amendment would fulfill the legislature's clear intent without violating double jeopardy concerns, as "the statute put [defendant] on notice that restitution could be amended"); *State v. Goodrich*, 733 P.2d 1000 (Wash. Ct. App. 1987) (finding that the restitution statute at issue "does not provide" for "restitution based on testimony of projected future medical expenses" and instead provides that an offender "remain under the court's jurisdiction for a maximum term of 10 years subsequent to the imposition of sentence," during which time, the restitution order may be modified to increase defendants' obligation to make restitution when a victim incurs additional costs); *but see State v. C.A.E.*, 201 P.3d 361 (Wash. Ct. App. 2009)

(holding that restitution for future medical expenses that a victim is not yet obligated to pay may not be ordered under the juvenile restitution provision, observing that the juvenile code does not contain a provision allowing the court to retain jurisdiction to modify the restitution order later to incorporate such expenses, unlike the adult provision analyzed in *Goodrich*, and calling on the legislature to remedy this inequity).

¹⁰ See, e.g., *United States v. Pearson*, 570 F.3d 480, 486-87 (2d Cir. 2009) (affirming the propriety of the inclusion of the costs of future expenses for counseling in a restitution order and remanding for a more thorough explanation from the trial court regarding the basis for its determination of the amount ordered); *United States v. Doe*, 488 F.3d 1154, 1160-62 (9th Cir. 2007) (affirming restitution order for future counseling costs and the cost of future STD testing); *W.S. v. State*, 174 P.3d 256, 258-60 (Alaska Ct. App. 2008) (recognizing that courts have interpreted Alaska's restitution statute broadly as authorizing a victim's future counseling when the need for this counseling and the projected amount of the counseling expenses are firmly established); *Krueger v. State*, No. A-7411, 2001 WL 721673, at *4 (Alaska Ct. App. June 27, 2001) (observing that, "under Alaska case law, [defendant] was entitled to have [the magistrate] base the restitution for future medical expenses (surgery had not yet been performed when [defendant's] plea was entered) on firm evidence establishing the amount"); *State v. Howard*, 815 P.2d 5, 6-7 (Ariz. Ct. App. 1991) (affirming restitution order including amounts for the victim's future medical care and future lost wages); *People v. Phelps*, 48 Cal. Rptr. 2d 855 (Cal. Ct. App. 1996) (affirming a restitution award for injuries arising out of an automobile accident, including past and future medical expenses relating to treating the now-paralyzed child-victim); *People v. Webb-Johnson*, 113 P.3d 1253, 1254 (Colo. Ct. App. 2005) (affirming that future medical expenses are properly included in a restitution order) (citation omitted); *Drye v. State*, 691 So. 2d 1168, 1169 (Fla. Dist. Ct. App. 1997) (finding that the trial court properly ordered defendant to pay for the victim's future counseling costs but remanding for a determination of the amount of the future costs); *Sims v. State*, 637 So. 2d 21, 23 (Fla. Dist. Ct. App. 1994) (affirming a restitution order for future medical expenses); *Regent v. State*, 703 S.E.2d 81 84-87 (Ga. Ct. App. 2010), *overruled on other grounds by Nazario v. State*, 746 S.E.2d 109 (Ga. 2013) (affirming restitution order, including amounts for future surgical procedures); *People v. Auler*, 621 N.E.2d 288, 292 (Ill. Ct. App. 1993) (noting that Illinois' restitution statute permits an order of restitution for prospective counseling expenses in sex abuse cases, and that orders should include, *inter alia*, a maximum dollar limit, proof of expenses incurred, and a time frame for counseling); *State v. J.B.*, 643 So. 2d 402, 407-08 (La. Ct. App. 1994) (holding that the juvenile court did not err in ordering restitution for two years of future counseling costs for two sex abuse victims); *McDaniel v. State*, 45 A.3d 916 (Md. Ct. Spec. App. 2012) (affirming the propriety

of ordering restitution for future dental work, where estimates had been obtained but the work had not yet been done); *State v. Grindheim*, 101 P.3d 267, 276 (Mont. 2004) (concluding that restitution calculations for long-term counseling needs based on the therapist's testimony were reasonable and not contradicted and that the district court did not err in imposing restitution for the victim's future counseling needs); *Washington v. State*, 922 P.2d 547, 551 (Nev. 1996) (remanding to the district court to "set a specific dollar amount of restitution to the victim for future counseling costs"); *Botts v. State*, 854 P.2d 856, 857 (Nev. 1993) (remanding to the district court for a hearing to establish the amount of "the victim's past and future expenses" for "counseling and/or professional services required by her as a result of the actions of the defendant"); *State v. Oakes*, 13 A.3d 293, 306-07 (N.H. 2010) (concluding that an order requiring defendant to pay restitution for the victim's future counseling costs up to a maximum of \$10,000 would not violate the state's restitution statute, as nothing in the statute precluded a trial court from ordering defendants to pay restitution for future economic losses caused by their crimes); *State v. Smith*, 704 A.2d 73, 74, 80 (N.J. Super. Ct. App. Div. 1997) (reviewing, *inter alia*, a restitution order mandating defendant to pay the future medical bills of the victim and remanding to the Law Division to conduct a hearing regarding defendant's "ability to pay restitution"); *State v. Baker*, 426 S.E.2d 73 (N.C. 1993) (referencing, without discussion, defendant's restitution order to pay, *inter alia*, "all past and future medical expenses of the victim arising from the case"); *State v. Canady*, 570 S.E.2d 262, 266-67 (N.C. Ct. App. 2002), *abrogation on other grounds recognized by State v. Smith*, 707 S.E.2d 779 (N.C. Ct. App. 2011) (affirming the trial court's restitution order of up to \$2,000 for future mental health treatment required by minor sex abuse victims, where there was testimony that the victims' insurance would not cover the total cost of treatment); *State v. Borders*, No. CA2004-12-101, 2005 WL 2001421, at *4-5 (Ohio Ct. App. Aug. 22, 2005) (reversing a restitution order for future counseling expenses that was not verified through evidence or testimony and remanding for further proceedings to substantiate the restitution ordered); *State v. Hart*, 699 P.2d 1113 (Or. 1985) (en banc) (rejecting constitutional challenges to Oregon's restitution provisions and affirming restitution orders for "past and future expenses related to injuries the victim suffered due to defendant's criminal conduct"); *State v. Allen*, 858 P.2d 176 (Or. Ct. App. 1993) (finding that the trial court did not err in ordering defendant to pay restitution to cover counseling costs of each sex abuse victim in an amount not to exceed \$10,000—including past and future costs—based on evidence in the presentence report showing that the victims' counselor and Children's Services Division believed that the victims would need future counseling); *Commonwealth v. Oree*, 911 A.2d 169 (Pa. Super. Ct. 2006) (affirming restitution for the victim's care, including the costs of future care in a nursing home); *Commonwealth v. Boyles*, 595 A.2d 1180, 1188-90 (Pa. Super. Ct. 1991) (finding no error

in the trial court's order of restitution for future counseling that required defendant to pay \$85 a week for thirty weeks, where there was testimony that the victim would need at least one year of therapy with at least one session per week and that each session costs \$85); *State v. Allen*, 15 P.3d 110 (Utah Ct. App. 2000) (affirming restitution order for the victim's counseling and medical bills that was issued after defendant's term of probation had been terminated, following court hearings to establish the victim's continuing need for counseling and medication, as "trial courts may retain jurisdiction over criminal defendants for purposes of restitution, independent of a defendant's probationary status"); *State v. Hall*, No. 2005-424, 2006 WL 5866276 (Vt. May 2006) (affirming restitution order for future medical costs necessary to repair the victim's teeth and jaw, where the amount was based on "an identified set of medical procedures, the cost of which is susceptible to estimation"); *Keeling v. Commonwealth*, 487 S.E.2d 881 (Va. Ct. App. 1997) (affirming the trial court's revocation of defendant's suspended sentence for failure to pay a restitution obligation for past and future medical bills, where the restitution was ordered not to exceed \$10,000 but where a precise amount of restitution had not previously been ordered and where defendant failed to pay the incremental amounts fixed by the probation officer); *Glover v. State*, 169 P.3d 553, 555-57 (Wyo. 2007) (affirming restitution order for medical expenses, including future medical expenses necessitated by defendant's criminal conduct, as they were "reasonably foreseeable" and the evidence provided a "reasonable basis for estimating the loss"); *Hodgins v. State*, 962 P.2d 153, 158-60 (Wyo. 1998) (affirming restitution for long-term health care costs).

¹¹ See, e.g., *United States v. Serawop*, 505 F.3d 1112 (10th Cir. 2007) (affirming restitution for future income lost as a result of defendant's offense and the subsequent death of the victim); *United States v. Cienfuegos*, 462 F.3d 1160, 1163-69 (9th Cir. 2006) (holding that restitution for future lost income may be ordered as long as it is not based upon speculation, but is reasonably calculable, and remanding for determination of the amount of restitution); *United States v. Oslund*, 453 F.3d 1048, 1062-63 (8th Cir. 2006) (affirming that lost future income may appropriately be ordered in restitution); *Jahnke-Leland v. State*, No. A-5118, 1994 WL 16196224 (Alaska Ct. App. May 25, 1994) (affirming restitution for the financial impact resulting from the death of a victim, including amounts for future lost income); *Howard*, 815 P.2d at 6-7 (affirming restitution order including amounts for the victim's future medical care and future lost wages); *Giordano*, 170 P.3d at 657-62 (upholding restitution to the spouse of a deceased victim for lost future support and wages that would have been earned by the deceased victim); *People v. Millard*, 95 Cal. Rptr. 3d 751, 769-70 (Cal. Ct. App. 2009) (concluding that the trial court did not err in including restitution for lost future earnings in a case arising out of an automobile accident that permanently disabled the victim); *Koile v. State*, 934 So. 2d 1226, 1229-

33 (Fla. 2006) (holding that restitution for lost future income is clearly authorized, in a case where the victim died as a result of defendant's criminal conduct); *State v. Smith*, 368 S.E.2d 33, 38-39 (N.C. Ct. App. 1988) (acknowledging that lost future income was properly compensable in a restitution order, but remanding for recalculation of the restitution obligation and determination of defendant's ability to pay); *State v. Laycock*, 214 P.3d 104, 110-12 (Utah 2009) (remanding to the trial court to determine complete restitution, as the deceased victim's lost income is "expressly enumerated as an element of complete restitution").

¹² See, e.g., *People v. Wager*, 342 N.W.2d 619 (Mich. Ct. App. 1983) (affirming restitution for lost child support to the deceased victim's children); *Butler v. State*, 544 So. 2d 816, 821-23 (Miss. 1989) (en banc) (observing that lost future child support is a legitimate subject of a restitution order, but finding that in light of the strong presumption that a child of a married woman was fathered by her husband, the child in this case was not a legally eligible recipient of the child support payments); *State v. Cosgaya-Alvarez*, 291 P.3d 939, 942-45 (Wash. Ct. App. 2013) (affirming restitution order for payment of lost future child support and distinguishing prior case law, where the child support obligation had been reduced to judgment and the restitution amount "is easily determined").

¹³ See *Meerscheidt v. State*, 931 P.2d 220, 227 (Wyo. 1997) (reversing and remanding for a determination of the specific amount of restitution that defendants must pay for the victims' future moving expenses, and for a determination of whether the victims' moving expenses are reasonably foreseeable future damages that will be incurred as a result of defendants' criminal conduct).

¹⁴ See, e.g., *Goff v. State*, 875 A.2d 132 (Md. 2005) (affirming restitution order for the cost of replacing a shower, based on an estimate the victim had obtained for the work, which the victim could not afford to have done until restitution was paid); *State v. Moriarty*, 742 P.2d 704, 707 (Or. Ct. App. 1987) (affirming restitution order for Social Security benefits lost when, as a result of defendant's concealment of the crime, the victim's family could not prove that he was deceased); *State v. Loutsch*, 656 N.W.2d 781, 782-87 (Wis. Ct. App. 2002), *reversed on other grounds by State v. Fernandez*, 764 N.W.2d 509 (Wis. 2009) (analogizing lost sick hours that would ultimately impact health benefits in retirements to lost future earning capacity and affirming restitution for the value of the lost sick leave).

¹⁵ See, e.g., *United States v. Palmer*, 643 F.3d 1060, 1067 (8th Cir. 2011) (recognizing that requiring the victim "to incur out-of-pocket expenses and seek reimbursement each time she needs counseling . . .

reasonably could deter or discourage her from receiving help”).

¹⁶ See, e.g., *People v. Gkanios*, 199 A.D.2d 280 (N.Y. App. Div. 1993) (deleting the trial court’s restitution order in a sex offense case that defendant pay restitution “in an amount not to exceed \$10,000”—entered one year before the issuance of the appellate division’s decision—which was intended “to defray the cost of any counseling expenses which the victim might incur in the future” when “the victim apparently failed to seek counseling,” as the appellate court found that under these circumstances “there is no need for restitution”).

¹⁷ See generally *Ensuring Full Restitution for Crime Victims: Polyvictims as a Case Study in Overcoming Causation Challenges*, NCVLI Victim Law Bulletin (Nat’l Crime Victim Law Inst., Portland, Or.), July 2013, available at <https://law.lclark.edu/live/files/15101-ensuring-full-restitution-for-crime-victims>.

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