Anthony Slosser
2730 St. Joseph Ave.
Columbus, OH 43204
614-395-0944
ajslosser@gmail.com

Re: HB14 – Proponent Testimony

Families and Aging Committee
Ohio House of Representatives
135th General Assembly
May 14, 2024

Chair Schmidt, Vice Chair Miller, Ranking Member Denson and members of the House Families and Aging Committee,

Thank you for the opportunity to provide proponent testimony regarding HB14. My name is Anthony Slosser and I helped author HB14, as well as this bill's predecessor, HB508 of the 134th General Assembly. I was born and raised in Tiffin as a child of divorced parents, having every-other-weekend visitation with my father. I moved to Columbus over 20 years ago to attend college and I have lived in Franklin County ever since. I am a never-married father of an 11-year-old son who currently spends the majority of the year with his mother in Findlay. Since 2013, I have been fighting a nonstop battle to gain and maintain access to my son, most recently as a pro se filer. With my testimony, I would like to address the numerous inconsistencies, mischaracterizations and falsehoods put forth by HB14's opponents, most notably the Ohio Judicial Conference and the Ohio Bar Association.

I. Faulty Premise

Opponents of HB14 have repeatedly framed this legislation as a tug-of-war between parents' rights and children's rights, as if the two are mutually exclusive. Such a framing begets the premise that any protection of a fit parent's rights is an automatic infringement of the child's rights. This is a bizarre position to take, given what we know about the benefits of a two-parent upbringing. By protecting the fit parent's right to have a meaningful influence in their child's life, HB14 is, in turn, protecting the child's right to a two-parent upbringing; as opposed to the one-parent, one-visitor model that is so often employed by Ohio's courts.

II. A Needed Culture Change

A. The Research.

Research is clear that children do best when both parents are involved. Among other issues, children raised without the active involvement of two parents are more likely to: fail in school,[i] use drugs,[ii] commit crimes,[iii] engage in early sexual activity[iv] and commit suicide.[v] Additionally, studies

indicate that having secure and high-quality relationships with both mothers and fathers is superior to having only one secure relationship, regardless of whether that secure relationship is with mother or with father,[vi] and that maintaining strong child-parent relationships necessitates spending time with children, especially given children's rapid development both within and across developmental periods.[vii] Further, with respect to a child's adjustment to parental separation, Dr. Sarah Schoppe-Sullivan testified on multiple occasions that the most important thing is to preserve the child's relationship with each parent, by way of an equal parenting time share.[1]

B. The Mindset.

1. Judiciary

Despite that research, a representative for the Ohio Judicial Conference testified that 50-50 parenting is "unnatural".[2] Aside from demonstrating an outdated mindset that has no place in today's conversation, that statement is nonsensical in the context of the many different local court rules in Ohio. How is Hocking County's 86-14 split more natural than 50-50? How do we explain the counties that practice 50-50 as their local court rule? Additionally, during hearings on HB14's predecessor, HB508 of the 134th General Assembly, the OJC acknowledged that bias exists in Ohio's Family Courts.[3]

2. Bar Association

The Bar Association's denial of the equal parenting movement does not affirm that no such movement is taking place. In fact, since 2018 the following states have adopted equal parenting time presumptions: Kentucky (2018), Arkansas (2021), West Virginia (2022), Florida (2023) and Missouri (2023). Additionally, the Bar's assertion that Arkansas "makes no presumption of equal time at all; it only presumes that 'joint custody' is in the best interests of a child"[4] is easily debunked by reading the Arkansas Code.[5]

However, one need not look outside Ohio to see the movement toward equal parenting. Since the start of 2018, the following counties have adopted standard parenting time schedules that provide an equal division of the parenting time:

Holmes (2018)	Tuscarawas (2019)	Carroll (2020)	Clermont (2020)

Additionally, the following counties have added at least one option of a standard schedule that would provide for an equal division of the parenting time:

Mahoning (2018)	Adams (2019)	Stark (2019)	Van Wert (2019)
Miami (2020)	Marion (2021)	Portage (2022)	Summit (2022)
Greene (2023)			

[1] House Families and Aging Committee, 3/14/23 @ 32:25; House Civil Justice Committee, 3/8/22 @ 1:17:32.

[2] House Families and Aging Committee, 3/21/23 @ 20:00.

[3] House Civil Justice Committee, 5/24/22 @ 1:59:50.

[4] Written testimony of Eric Johnson, Ohio State Bar Association, 3/21/23, pg. 2.

[5] A.C.A. § 9-13-101(a)(5): "As used in this section, 'joint custody' means the approximate and reasonable equal division of time with the child by both parents individually as agreed to by the parents or as ordered by the court."

Still more counties have moved toward equal parenting time, if not quite getting there (zero counties have moved away from equal parenting time since 2018):

Ottawa (2019)	Preble (2019)	Seneca (2020)	Sandusky (2021)
Defiance (2023)	Fayette (2023)	Fulton (2023)	Henry (2023)
Williams (2023)			

The Bar has stated a belief that "Each parent is entitled to enter the courtroom at the same starting point." Interestingly, the Bar also believes that this equality "cannot be accomplished by starting them at the finish line together…"[6] To claim that HB14 would start parents at the finish line together would imply an understanding of the end goal being equal parenting. It would seem that, rather than reach that end goal as quickly as possible, the Bar favors the current arduous process to achieve that end goal. Who wins in that marathon? The attorneys charging billable hours for years; certainly not the children and fit parents forced to slog through the process.

Lastly, the Bar also insists that HB14 will promote instances of parents pursuing equal parenting solely as a means to reduce child support. It would be foolish for this committee to believe that such exploitation doesn't exist under current law, only in reverse. In other words, the parent receiving child support refuses equal parenting because it might mean a reduction in child support received. By calling out one scenario and ignoring the other, the Bar is effectively demonizing all parents that attempt to gain equal access to their children.

C. The Prevailing Practice.

Despite the OJC's testimony acknowledging bias and that equal parenting is "unnatural", members of the judiciary have repeatedly stated that they often do award liberal parenting time schedules. However, those statements have yet to be backed up by any actual data. Ohio courts do not specifically track these statistics and they have opposed proposals to do so.[7] As such, the reality is that nobody really knows what parenting time division is typically ordered, but we do have hints.

1. Local Court Rules

As of today, only six counties practice a standard rule that provides a 60-40 or better split and 10 more counties provide an option of 60-40 or better. That leaves 72 counties where the standard rule does not provide at least a 60-40 split.

2. ODJFS 2023 Child Support Guidelines Review

- By law, the Court must issue a parenting time order whenever it issues a child support order.[8]

[6] Written testimony of Eric Johnson, Ohio State Bar Association, 3/21/23, pg. 2.
[7] House Civil Justice Committee, 5/24/22 @ 1:58:20.
[8] ORC § 3119.08.

- By law, the Court must reduce child support by 10% if the corresponding parenting time order exceeds 90 overnights in a year.[9]
- By law, the Court may grant a deviation on top of the 10% reduction if the corresponding parenting time order exceeds 90 overnights in a year.[10]

The 2023 Child Support Guideline Advisory Council conducted a Child Support Deviation Study, sampling child support orders from nine counties across the state over a two-week period in October of 2022.[11] Of the 518 child support orders sampled:

- Only 16% indicated they met the requirement for the automatic 10% deduction.
- Only 8% were deviated explicitly due to extended parenting time.
- Less than 1% (five of 518) were deviated explicitly due to equal parenting time.

Additionally, of the 518 child support orders sampled, 87% ordered the father to pay support, while 78% ordered the mother to receive support. Coupled with the lack of parenting time orders that allow for at least a 75-25 timeshare, we can infer from this data that one particular parent is named custodial parent an overwhelming majority of the time.

Given that current law presumes a custodial/non-custodial arrangement, and based on the data above, it is obvious that parents do not enter the courtroom on equal footing. In fact, this very imbalance was acknowledged in 2001 by the Ohio Task Force on Family Law and Children:

> "Under current Ohio law, parents have the opportunity to create their own parenting plans. If parents cannot agree, courts may construct a plan and order parents to comply with its terms. In many jurisdictions, courts rely on a single, standardized plan, usually found in a local rule. These plans are predicated on the term "custodial parent" and on a standard parenting time order, usually a 75%-25% division of access time with the children, thereby perpetuating win/lose situations between the two parents. The custodial parent wins a larger portion of the child's time, and control over most major life decisions. The other parent is reduced to a visitor, with a disproportionately smaller role in the life of his or her child. Furthermore, the existence of a single fallback plan creates a situation in which a parent who expects to be victorious in litigation has little incentive to mediate or engage in any other constructive, cooperative process to create a parenting plan."[12]

D. The Remedy.

As evidenced from testimony by the OJC and the parenting time data that we do have, it is clear that the current culture in Ohio's Family Courts is one that sees no reason to change the one-parent, one-visitor model. During hearings on the 134th GA's HB508, Civil Justice Committee Chair Hillyer asked

[9] ORC § 3119.051.
[10] ORC § 3119.231.
[11] ODJFS 2023 Child Support Guidelines Review, Appendix B, pg. 117-132.
[12] https://www.supremecourt.ohio.gov/JCS/taskforce/report_final.pdf, pg.8.

how we change that culture and the response he received from a former member of the judiciary was telling:

> "If you have legislation that says the starting point shall be equal parenting time, taking into account the best interests of the child, judges are going to have to follow that." [13]
>
> -Retired Magistrate Karen Zajkowski, Tuscarawas County

Simply put, HB14 is that legislation. Founded on the idea that parents generally care for and are committed to the welfare of their children, and bolstered by 40 years of research, HB14 presumes that both parents should be equally responsible for raising their children. From that premise, it creates a starting point, based on the best interests of the child, for the court to begin the allocation of parental rights and responsibilities. But most importantly, it does not require that the court finish with an equal allocation of parental rights and responsibilities; each case is judged on its own merits.

1. Defining Best Interest.

HB14 accomplishes the goal of putting the best interests of the child first by clearly defining the best interests of the child, a definition that is lacking in current law. This definition of best interest is derived from over 40 years of research showing that children are best served by a two-parent upbringing, and is not subject to the whim of whichever jurist happens to be sitting on the bench on a particular day in a particular county. Additionally, this research shows that equal parenting is best even in cases of non-violent conflict[viii] and among infants and toddlers.[ix] The end result is a baseline that preserves the child-parent relationship first and then decides if a parent needs to be restricted or removed. By removing the win/lose pressure, identified by the Ohio Task Force on Family Law and Children over 20 years ago, the parents will then have the ability to negotiate in good faith and decide which division of parenting time works best for their child.

2. Reframing Judicial Discretion

From that baseline of equality, the court is free to allocate the parental rights and responsibilities based on circumstances that are proven to be detrimental to the child. Despite the wording, this is not a novel concept. In fact, testimony from the OJC indicated that the yet-to-be-sponsored FLRI bill would foster the relationship between a child and both parents "unless inconsistent with the child's best interest". To summarize, both HB14 and the FLRI start with a goal and both proposals move away from that goal, as necessary. The difference, aside from the FLRI's fancy way of saying "detriment", is that HB14 is very clear and upfront about what goal is desired.

The Bar incorrectly claims that HB14 will circumvent the state's role as *parens patriae* over Ohio's children. *Parens patriae* refers to the state's power to **protect** vulnerable citizens incapable of protecting themselves, such as intervening against an abusive or negligent parent. HB14 retains this role by allowing the court to:

- Determine that neither parent is suitable to receive a Parental Rights and Responsibilities allocation. **HB14 § 3109.0435**, recodification of current ORC § 3109.04(D)(2). See also: LSC Analysis, pg.35.

[13] House Civil Justice Committee, 4/5/22 @ 1:43:04.

- Rebut the presumptions based on a history of child abuse/neglect, spouse abuse, domestic violence, parental kidnapping or sexual abuse. **HB14 § 3109.0411(B), HB14 § 3109.0421(B), HB14 § 3109.0422(A)**, adapted from current ORC § 3109.04(F)(2)(c) and ORC § 3109.04(F)(1)(h). See also: LSC Analysis, pg. 13-14, 17-18.
- Rebut the presumptions on a ruling that the parent is totally incapable of supporting or caring for the child. **HB14 § 3109.0411(D), HB14 § 3109.0421(E), HB14 § 3109.0422(J)**. See also: LSC Analysis, pg. 13-14, 17-18.

However, in the context of parenting time division, such as a county's local rule, the fitness of the parent is implied; no court would purposely place a child with an abusive parent. As it is presumed that fit parents act in the best interests of their children,[14] absent a showing of abuse or neglect and the need for protection from that action, it is inappropriate to invoke *parens patriae*. To do so would have the effect of the court imposing its preferred parenting style, as opposed to doing its job; i.e. protecting the child from harm.

3. Enlightened, Modern Solutions.

In disparaging HB14 as a "cookie-cutter solution to the issue it purports to address", the Bar Association claims that HB14 ignores the "enlightened and modern solutions" created by other states.[15] It then offers said solutions:

- "Enact a strong policy statement declaring the importance of shared parenting and that it be considered first by the court (like Arizona)."
    - HB14 does this. **HB14 § 3109.044**. See also: LSC Analysis, pg. 9.
    - Moreover, Ohio already has a policy regarding the parent child relationship, that states "the parent and child relationship is of fundamental importance to the welfare of the child, and that the relationship between a child and each parent should be fostered unless inconsistent with the child's best interests"[16] (emphasis added). Despite such a policy, a culture has been established wherein the child's relationship with one parent is often fostered at the expense of the other, as evidenced by the numerous standard parenting time orders that provide one parent with every-other-weekend visitation.
- "Mandate that a court issue findings of fact and conclusions of law explaining why shared parenting and equal time were not granted (like Oregon and Missouri)."
    - HB14 does exactly this. **HB14 § 3109.0420(A), HB14 § 3109.0420(B)**. See also: LSC Analysis, pg. 16.
- "Allow your state to create a statewide standard schedule, with the involvement of family law stakeholders, that promotes shared parenting and maximization of parenting time for both parent (like Indiana)."
    - An interesting proposal, given the Bar's vehement rejection of "cookie-cutter" solutions; however, HB14 also does this. **HB14 § 3109.0466(B)**. See also: LSC Analysis, pg. 33.

[14] Troxel v. Granville, 530 U.S. 57 (2000) at 68 ("[T]here is a presumption that fit parents act in the best interests of their children.").

[15] Written testimony of Eric Johnson, Ohio State Bar Association, 3/21/23, pg. 3.

[16] ORC § 3109.401(A)(1), effective date of 3/22/01.

- Also interesting is the Bar's criticism that there are many different ways to equally divide the parenting time.[17] On one hand, they believe a single solution is too simplistic, while on the other, multiple solutions are too complicated.

In summary, HB14 was borne out of enlightened and modern solutions. It channels the best, modern research available on child development after a parental separation, research that has concluded that shared parenting is beneficial to children across a number of important domains of development, including stronger mental and physical health and better academic performance.[x] To be clear, HB14 does not guarantee an equal outcome; it guarantees an equal opportunity.

III. Mischaracterizations of HB14

Mandates Equal Time

- If HB14 mandated equal parenting time, it would be a much shorter bill. The fact is that each presumption made by HB14 is rebuttable, so that courts retain their discretion. Additionally, parties are free to agree to any parenting time division that they deem best for their children.

Unmarried Parents

Both the Ohio Judicial Conference and the Bar Association have claimed that HB14 will impose equal decision-making and equal parenting time in all cases where the parties were never married, regardless of circumstances such as:

- Establishment of paternity.
  - HB14 *requires* the court to consider this (existing law allows, but does not require, the court to consider establishment of paternity). **HB14 § 3109.0436(C),** recodification of ORC § 3109.043(C). See also: LSC Analysis, pg. 27.
- Established relationship with the child.
  - HB14 considers this. **HB14 § 3109.0422(D)**, adapted from ORC § 3109.04(F)(1)(c); **HB14 § 3109.0436(C)**, recodification of ORC § 3109.043(C); **HB14 § 3109.0453(A)**, recodification of ORC § 3109.051(D)(1). See also: LSC Analysis, pg. 17-18, 27.
- Desire for equal time.
  - HB14 considers this… twice.
    - First, if equal parenting time is not desired, the parents are free to agree to *any* parenting time arrangement they deem best. **HB14 § 3109.0410**. See also: LSC Analysis, pg. 13.
    - Second, if equal parenting time is desired and is not immediately appropriate, the court is to develop a transition plan to integrate the estranged parent into the child's life, subject to rebutting factors. **HB14 § 3109.0467(A)**. See also: LSC Analysis, pg. 24-25.
- Child support exploitation.
  - Again, the Bar prefers to demonize parents seeking equal time with their children.

[17] Written testimony of Eric Johnson, Ohio State Bar Association, 3/21/23, pg. 3-4.

Puts Children in Danger

Various domestic violence organizations have claimed that HB14 will put children in danger of being abused. HB14 provides protection for placing children in abusive situations in the following ways:

- Each presumption is explicitly rebuttable based on a parent's history of abusive/violent behavior. **HB14 § 3109.0411(B), HB14 § 3109.0421(B), HB14 § 3109.0422(A)**, adapted from current ORC § 3109.04(F)(2)(c) and ORC § 3109.04(F)(1)(h). See also: LSC Analysis, pg. 13-14, 17.
- The court is allowed to fully investigate each parent prior to the beginning of trial and requires each parent to file an affidavit attesting to any previous convictions or guilty pleas regarding child abuse/neglect, domestic violence, sexual assault, etc. **HB14 § 3109.0431**, recodification of ORC § 3109.04(C); **HB14 § 3109.0433**, recodification of ORC § 3109.04(M). See also: LSC Analysis, pg. 35.
- Parenting Time Orders and Companionship/Visitation Orders are subject to provisions that would disqualify abusive parents. **HB14 § 3109.0453**, recodification of ORC § 3109.051(D). See also: LSC Analysis, pg. 36.

As each of the aforementioned provisions are derived from existing law (in some cases, word-for-word), an unfit parent that is excluded from parenting time today will be excluded from parenting time under HB14. Merely extending a fit parent's parenting time from every-other-weekend to equal parenting time does not increase the likelihood of abuse. There is simply no logic to the idea that a parent is safe enough to be around their child from Friday-Sunday, but not Monday-Thursday. Additionally, we have data from counties in Ohio that already utilize an equal parenting time model for their local court rules. Child maltreatment rates in those counties are below the statewide average.[18]

Retroactive

The Bar claims that enacting HB14 will require courts to "review all prior orders under the new presumptive standard"[19] and "encourage all parents with existing custody orders that are not equal to come back to court and request equal time and equal rights."[20]

- In order to modify a previous custody order, a change in circumstance for the parent or the child must exist. **HB14 § 3109.0439(B), HB14 § 3109.0442(A)(2)**. See also: LSC Analysis, pg. 20-22.
- A change to the law is not a change of circumstance.

Inapplicable to Many Cases

The Bar's criticism that HB14 fails to consider many families' post-separation situations is filled with many illogical considerations that would suggest that the importance of a child-parent relationship is subject to the following:

- The child's age.

[18] "Shared Parenting and Child Abuse and Neglect: An Ohio Study," National Parents Organization, 2023, available at: http://bit.ly/3l1DkCY

[19] Written testimony of Eric Johnson, Ohio State Bar Association, 3/21/23, pg. 3.

[20] Written testimony of Nicole Rutter-Hirth, Ohio State Bar Association, 3/21/23, pg. 3.

    - Aside from the fact that many local court rules already do not account for the child's age (including the state's most populous county: Franklin), research has shown that "There is no evidence to support postponing the introduction of regular and frequent involvement, including overnights, of both parents with their babies and toddlers. Maintaining children's attachment relationships with each parent is an important consideration when developing parenting plans."[xi]
- Other family members (non-biological included).
    - Are we really to believe that a relationship with a step-sibling should take precedence over the relationship with a parent?
- The nature in which the child was legally conceived.
    - Does having an extramarital affair disqualify one's ability and/or right to be a parent? Does it mean the child should not be entitled to a two-parent upbringing?

Record Keeping

Members of the judiciary have stated that the record keeping requirement of HB14 will require additional funding for the courts, as "there is currently no way to track this information [overnights] through the use of court management systems"[21] and that such a requirement "serves no useful public benefit."[22]

- As previously noted, courts are required to issue a parenting time order when issuing a child support order and, in turn, are required to reduce child support based on a qualifying number of overnights. In other words, by law, courts should already be calculating the number of overnights in each custody case. Simply recording and storing that calculation is not a burdensome task.
- The useful public benefit derived by such record keeping would be to keep the voters informed. During hearings on the 134th GA's HB508, the OJC's spokesperson essentially laid responsibility for biased judges at the feet of ill-informed voters.[23]

IV. Conclusion

It is apparent that an outdated culture exists in Ohio's Family Courts despite over 20 years passing since the current state policy and statutes were put in place. This culture runs in direct conflict with the best interests of the children and will require a legislative action to overcome. Such action has been repeatedly opposed for years by large special interest groups who would sacrifice the interests of Ohio's children in favor of the significant profits to be reaped from requiring parents to engage each other in litigation for years. It would be the hope of this legislation's opponents that they may convince this legislature maintain status quo, thereby preserving a lucrative industry that serves only to weaken Ohio's families.

[21] Written testimony of Penny Ann Gates, Clermont County Domestic Relations Court, 3/21/23, pg. 3.
[22] Written testimony of Karen Zajkowski, Tuscarawas Count Court of Common Pleas, 3/21/23, pg. 2.
[23] House Civil Justice Committee, 5/24/22 @ 2:01:54.

Under HB14, we will have true shared parenting, as shared parenting orders will only be issued when the parents jointly agree to it. Starting from a position of equality means that neither parent will go into the negotiation fearing losing their child and neither parent will feel pressured to agree to something that they know is not in the best interest of their child.

When parents do not agree, that is when it is most crucial for the law to protect the child's right to engage in a relationship with both parents equally. HB14 will protect that right by inverting Ohio's current process to allocate parental rights and responsibilities. Instead of starting with one parent and one visitor working through the best interest factors toward equality (someday), we start with equality as the baseline best interest and work through largely the same factors to deviate away from equality, as necessary. Over 40 years of research supports that equal parenting is in the best interest of the child. HB14 is what Ohio's children and parents deserve.

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Chair Schmidt and members of the committee, thank you for your consideration.

Sincerely,
Anthony Slosser

Studies Cited:

[i] McLanahan, Sara et al., "The Causal Effects of Father Absence," Annual review of Sociology 39(2013)399-427; Lundbert, Shelly, "Father Absence and the Educational Gender Gap," IZA Discussion Papers, No. 10814, Institute of Labor Economics (IZA), Bonn.

[ii] Hoffmann, John P. "The Community Context of Family Structure and Adolescent Drug Use." Journal of Marriage and Family 64 (May 2002)314-330; Bronte-Tinkew, J., Moore, K. A., Capps, R. C., & Zaff, J., "The influence of father involvement on youth risk behaviors among adolescents: A comparison of native-born and immigrant families," Social Science Research, 35(2004)181-209.

[iii] Demuth, Stephen and Susan L. Brown, "Family Structure, Family Processes, and Adolescent Delinquency: The Significance of Parental Absence Versus Parental Gender," Journal of Research in Crime and Delinquency 41-1(February 2004)58-81; Bush, Connee, Ronald L. Mullis, and Ann K. Mullis, "Differences in Empathy Between Offender and Nonoffender Youth," Journal of Youth and Adolescence 29 (August 2000)467-478; Coley, R. L., & Medeiros, B. L., "Reciprocal Longitudinal Relations Between Nonresident Father Involvement and Adolescent Delinquency," Child Development 78(2007)132-147; Hill, M. A., & O'Neill, J., Underclass behaviorsin the United States: Measurement and analysis of determinants(1993) New York: City University of New York.

[iv] Ellis, Bruce J., et al, "Does Father Absence Place Daughters at Special Risk for Early Sexual Activity and Teenage Pregnancy?," Child Development 74-3(2003)801-821.

[v] Weitoft, Gunilla Ringbäck, "Mortality, Severe Morbidity, and Injury in Children Living with Single Parents in Sweden: A Population-based Study," The Lancet 361-9354(January 25, 2003) 289-295, https://doi.org/10.1016/S0140-6736(03)12324-0

[vi] Dagan, O., Schuengel, C., Verhage, M. L., van IJzendoorn, M. H., Sagi-Schwartz, A., Madigan, S., ... & Collaboration on Attachment to Multiple Parents and Outcomes Synthesis. (2021). Configurations of mother-child and father-child attachment as predictors of internalizing and externalizing behavioral problems: An individual participant data (IPD) meta-analysis. New Directions for Child and Adolescent Development, 180, 67-94. https://doi.org/10.1002/cad.20450

[vii] Adamsons, K. (2018). Quantity versus quality of nonresident father involvement: Deconstructing the argument that quantity doesn't matter. Journal of Child Custody, 15(1), 26-34. https://doi.org/10.1080/15379418.2018.1437002

[viii] Nielsen, Linda, "Re-examining the Research on Parental Conflict, Coparenting, and Custody Arrangements," Psychology, Public Policy, and Law 23-2(2017)211-231; Nielsen, Linda, "Joint Versus Sole Physical Custody: Outcomes for Children Independent of Family Income or Parental Conflict," Journal of Child Custody (2018) DOI:10.1080/15379418.2017.1422414.

[ix] Warshak, Richard, et al., "Social Science and Parenting Plans for Young Children: A Consensus Report," Psychology, Public Policy, and Law 20-1(2014)46-67; Warshak, Richard, "Night Shifts: Revisiting Blanket Restrictions on Children's Overnights With Separated Parents," Journal of Divorce & Remarriage 59-4 (2018)282-323; Fabricius, William V. and Go Woon Suh, "Should Infants and Toddlers Have Frequent Overnight Parenting Time With Fathers? The Policy Debate and New Data," Psychology, Public Policy, and Law 23-1(2017)68-84; Bergström, Malin et al., "Preschool Children Living in Joint Physical Custody Arrangements Show Less Psychological Symptoms Than Those Living Mostly or Only With One Parent," Acta Pædiatrica 107(2018)294-300.

[x] Braver, S. L., & Lamb, M. E. (2018). Shared parenting after parental separation: The views of 12 experts. Journal of Divorce & Remarriage, 59(5), 372-387. https://doi.org/10.1080/10502556.2018.1454195

[xi] Warshak, Richard, et al., "Social Science and Parenting Plans for Young Children: A Consensus Report," op. cit., p. 60.