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Comments on Uniform Relocation of Children Act
Uniform Law Commission

I was asked to participate as an “observer” at the stakeholders meeting September 10-11, 2008 concerning the Uniform Relocation of Children Act (URCA). This invitation was issued by Jeff Atkinson, Esq., Reporter for the Drafting Committee on URCA. I subsequently was asked by the Association of Family and Conciliation Court (AFCC) to also represent AFCC as an observer at the URCA meeting. The AFCC request was made by Peter Salem, M.A. (Executive Director) and Robin Deutsch, Ph.D. (President of the Board of Directors). Observers were asked to submit comments on the Draft of the URCA. **The comments described below represent the ideas and views of this writer and do not represent an official position or views of the AFCC.**

I will describe my background and history of involvement on the issue of relocation of children and child custody evaluation. My publications and professional presentations/workshops in the area of relocation and child custody are listed as an appendix. I am a licensed psychologist in CO and NC and currently conduct a private practice in Colorado. I provide national consultation services in the area of child custody litigation with a consortium of four other psychologists. I have numerous publications in peer-reviewed journals and book chapters in the area of child custody evaluation. These publications generally concern forensic methodology and forensic models to assist child custody evaluators. Substantive areas covered in these publications concern relocation, partner violence, use of collateral sources, investigation, and psychological testing. A recent chapter with Professor Daniel Shuman addressed the issue of ultimate issue testimony in child sexual abuse cases. My involvement in the relocation problem began when I realized there was very little guidance for child custody evaluators and the courts on the complex situation posed by relocation. I needed conceptual guidance in my own evaluations. There was a virtual absence of any publications in the field of child custody on the issue of relocation. It was clear these cases were fraught with dilemmas on how to resolve the dispute with little room for negotiation or mediation. The parent either moves with the child or s/he does not. Compromise is difficult. For this reason relocation disputes end up in court with greater frequency than those involving other complex parenting disputes, even when there is a custody evaluation. For the past ten years I have worked on developing a research-based actuarial forensic model to assist evaluators and the courts on relocation. This risk assessment model has summarized the research on residential mobility/relocation for children of divorce and identifies major risk and protective factors. The model is widely used by evaluators across the country and is well known to many judges. It is just a first step in a process of evaluation and decision making. It is not a scientific technique that would be subject to an admissibility test

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such as *Daubert*. The risk assessment model is a framework to help organize the data and evidence in the case so that the assessment can be both scientifically-grounded and based on the facts/data. As the commentary in the URCA points out, relocation cases need to be very fact-driven regardless of the legal framework for the state from statutory and case law. Numerous state high court decision emphasize this point and call for individualized determinations for the given case even when there might be a legal presumption or designated burden of proof in the law (i.e., *In re Marriage of Burgess*, 1996; *In re Marriage of Francis*, 1996). The risk assessment approach combined with careful investigation on the relative advantages and disadvantages create an integrated approach to enable the custody evaluator to be more helpful to the court in contested cases. These relative advantages in a comparative assessment can be presented to the court in terms of a psychological cost/benefit analysis. It also can be described in terms of the resources available to the children in the different residential locations in the custody of the parents, or as a Social Capital analysis. This perspective of combining risk assessment and social capital has been presented in numerous workshops and will be presented again at the AFCC meetings on September 26, 2008 with Jonathan Gould, Ph.D., ABPP.

The issue of relocation, as with domestic violence, seems to create controversy that gives rise to polemics and polarization. This was highlighted in what I refer to as the “California relocation wars” or the discussions, lobbying, and Amici briefs submitted in the two high profile California cases of *In re Marriage of Burgess* (1996) and *In re Marriage of LaMusga* (2004). The central issue in almost all relocation disputes and therefore in legislative and appellate forums is the potential for relocation to cause harm to the child-nonresidential (i.e., non-moving) parent. It is generally assumed that children of divorce will show a healthier and more productive life (i.e., higher academic success) when they enjoy continued involvement by both parents. This goal is often stated in the form of social policy in state domestic relations statutes. The role of both the custody evaluator and trial judge is to make predictions about the children’s long-term developmental outcomes or adjustment following divorce when there is a dispute, or when there is an action to modify the original parenting plan. This predictive and decisional process should reflect a careful examination of the data available and facts presented, but the behavioral-developmental forecasts can be based on relevant social science research as well. Each custody evaluation should have available a number of “research hypotheses” (Austin, 2008a) that can be applied to the case and juxtaposed with the data. Research indeed shows that children of divorce show the best long-term adjustment when they enjoy quality relationships with both parents under conditions of low conflict (Amato & Sobolewski, 2001), but adjustment is higher when there is substantial involvement by both parents even when there is conflict (Sandler et al., 2008). While there is limited research on the overall relative superiority of one type of parenting time arrangement (i.e., sole vs. joint custody), studies show that adult children of divorce express the frequent opinion that they desired more time with their noncustodial fathers (Fabricius & Hall, 2000).

The issue of the relative contribution of nonresidential parents to the development of children obviously is discussed in every significant appellate case since it is the basis of the non-moving parent’s position in opposing the motion for the child to relocate. It really is not an arguable point if there is potential harm to this vital relationship. High courts have assumed there is an expectable degree of harm associated with relocation (*In re Marriage of Littlefield*, 1997; *Ramirez v. Ramirez-Baker*, 1994). One court even opined that because of the frequency of

residential mobility in society according to U.S. Census data relocation can't be all that harmful (*In re Marriage of Ciesluk*, 2005). Commentators have noted the converse perception that relocation of even a fairly modest distance can fundamentally alter the quality of the parent-child relationship by making regular involvement difficult to sustain (Shear, 1996). Similarly, high quality longitudinal research shows that relocation exceeding a distance more than a comfortable day trip tends to result in the nonresidential father playing a diminished role in the child's life and even dropping out (Hetherington & Kelly, 2002, p. 134). Courts have pointed out that if all the non-moving parent had to do was to demonstrate some degree of harm to the nonresidential-parent relationship, then no disputed relocation case would result in relocation (*Goldfarb v. Goldfarb*, 2004; *In re Marriage of LaMusga*, 2004). It follows that resolving a relocation dispute requires the court to find ways to mitigate the harm in the form of a new and alternative parenting time arrangement, which usually means a school age child spending most of the summer with the non-moving parent. But how is harm to a very young child mitigated with a long distance arrangement? Evaluators can identify or make a prediction on the degree of risk associated with relocation (or not relocating) and to describe a strategy to mitigate the harm, but in the end only the trier of fact can know if the degree of potential harm is sufficient to deny relocation (or insufficient so as to permit relocation). Only the court can determine this "threshold of harm" or if the predicted effects of relocation fall within the court's comfort zone on the best interests of the child. I believe this description reflects the psycho-legal dynamics that confront the parties and decision maker in relocation cases.

The prominent California cases (*Burgess*; *LaMusga*) highlighted the differing viewpoints on relocation and demonstrated how social policy issues loom large over relocation and they have been addressed in the prominent cases. It is these issues that likely will arise in discussions on this proposed model statute. THE core issue has always been the relative importance of the nonresidential parent for the development of the children versus the protective effect (and providing a sufficient level of social capital, support, resources, nurturance, warmth, etc.) for the child in the context and life experience of divorce and relocation. Research shows that the relationship with the custodial parent, in a traditional primary parent kind of arrangement, is the primary protective factor for the child (Hetherington et al., 1998). Research, in fact, shows when children enjoy a stable relationship with one caregiver who provides warmth and authoritative parenting the child's adjustment is likely to be a reasonably normal one (Kelly & Emery, 2003). Nonetheless, research is also quite clear that children in all family structures show overall poorer adjustment and long-term development compared to children in intact families (McLanahan & Sandefur, 1994) and that children of divorce fare better and will have the best outcomes when both parents are meaningfully involved (Amato & Sobolewski, 2001). Statistically, the research on the contributions of nonresidential parents still translates to the importance of fathers to children's development and the literature is now quite substantial on the important contributions of fathers (Lamb, 2004; Amato & Sobolewski, 2004) and that a high percentage of adult children of divorce (about 70%) express their desire in retrospect that they wished they had enjoyed about equal parenting time with their parents (Fabricius & Hall, 2000).

The debate in the California relocation cases resulted in a number of amici briefs being filed with the state Supreme Court. In the *Burgess* case, only briefs that supported the adoption of a legal presumption in favor of a custodial parent being able to relocate with the child were filed. The brief by the prominent divorce researcher, Dr. Judith Wallerstein, is summarized in

Wallerstein and Tanke (1996). The *Burgess* court adopted a presumption, or an initial burden of proof place on the noncustodial parent. Following *Burgess*, many observers, including legal and mental health practitioners and divorce researchers, asserted the brief before the court had misrepresented the social science research by citing only older, methodologically-flawed studies including predominantly articles by Wallerstein that relied on her limited, nonrepresentative clinical sample of divorced families. See Warshak (2000) for a review and critique. This contentious debate surfaced in the *LaMusga* case where multiple briefs were filed so the court had a more balanced presentation of the conflicting view on the relocation issue and relevant scientific research. Wallerstein and colleagues filed another brief. Warshak and Shear filed briefs with co-signees in both including prominent practitioners/authors and divorce researchers (see Wallerstein et al., 2004; Warshak et al., 2004; Shear et al., 2004). In the end the CA Sup Ct fundamentally changed the interpretation of *Burgess* so that the degree of anticipated harm to the nonresidential parent-child relationship could be examined as a reason for denying relocation. The Court apparently agreed with the interpretation of the relocation and the research literature presented by the new briefs on the importance of both parents for the development and best interests of the children.

An irony in the CA cases is the dispute about the effects of relocation was really about the relative importance of noncustodial fathers following divorce. No research on the effects of relocation per se was introduced into the analysis. The social science research was almost exclusively extrapolated from the divorce effects research literature on the contribution of fathers following divorce. One side in the debate took the position that the protective effect of the custodial parent-child relationship would insulate the child from harm due to changes associated with relocation just as it seemed to for the stress from divorce. I have reviewed the literature on residential mobility which is the scientific basis for examining the anticipated effects on children due to relocation. There is a very large and methodologically sophisticated survey research literature that has examined the effect of residential mobility on children of divorce (McLanahan & Sandefur, 1994) and compared to other family structures (Tucker et al., 1998). The bottom line from this literature in sociology and demography is that relocation stands as a general risk factor for children of divorce just as divorce itself is a general risk factor (Austin, 2008a). The factor of moving residences, even as few as one time (Tucker et al., 1998), is the second most important predictor of child outcomes¹ next to the decline in economic status associated with divorce (McLanahan & Sandefur, 1994). Economic changes and relocation explain about 60% of the difference in children's adjustment following divorce (compared to children in intact, two biological parent families). This research literature makes it impossible to ignore the reality that relocation does shake up the family lives and creates a risk of harm for the children. I have written that this literature is just a starting point for relocation analysis and should not serve to create a basis for an anti-relocation bias or presumption (Austin, 2008a). The literature does establish an estimated base rate of harm associated with relocation. It is important for evaluators and courts to strive to take an even-handed and impartial analysis of relocation for each family (Austin, 2005; Stahl, 2006). In Colorado, with the passage of the relocation statute [C.R.S. 14-10-129] for a modification case, the state Supreme Court found it necessary to elaborately analyze the issue probably because it appears there began to emerge at the trial court level a *de facto* anti-relocation bias both by evaluators making recommendations to the court and by the

¹ Outcome measures in the research literature include child well being, school behavior problems, school drop-out rate, teenage pregnancy, etc.

decision makers. The status quo in a post-decree context almost always seemed to prevail as evaluators seemed to show a strong proclivity to not disturb a stable situation, especially for very young children, where the child was ostensibly doing well with ample access to both parents. It was a “why mess with a good thing?” type of bias.² The Court affirmed the legislative intent to put the parents on equal footing in a relocation dispute and inserted the need to consider both parents’ and children’s interests and the extent to which the child’s interests were intertwined with those of the parent. The court further directed trial courts to consider both indirect as well as direct benefits to a child associated with relocation, but emphasized the advantages needed to be established by “non-speculative information.” My risk assessment approach to relocation is designed to assist evaluators and the court in assembling the data to assist with rational decision making and this forensic model seems to be widely used. It needs to be understood that demonstrating some degree of harm to the child-nonmoving parent relationship may not be sufficient to deny relocation. These cases are all about harm mitigation. Some degree of harm is inevitable. Cases such as *LaMusga* and *Goldfarb* point out that this issue and factor is very important, but the degree of harm may not surpass that threshold of harm (Austin, 2000) that is needed to deny relocation when there are very good reasons for the move, or when it passes a “cogency test.”

I have had some involvement in legislative activities and appellate law cases. In Colorado, the state Supreme Court issued new law on relocation in 1996 [*In re the Marriage of Francis*, 919 P.2d 776 (Colo. 1996)]. This decision seemed to largely duplicate the reasoning in *Burgess* and a presumption for relocation was established if the moving parent could make a *prima facie* case for the move. Legal and mental health practitioners seemed uniformly opposed to the law and its reasoning. In 2001 a legislative change was proposed to the domestic relations law on modification of original orders. I was asked to testify before the Colorado Senate Judiciary Committee on behalf of the State of Colorado Interdisciplinary Committee. A paper was prepared and presented that summarized the issues in the relocation dilemma and the relevant social science research. The bill was passed nearly unanimously in both houses and signed by the governor. This testimony was described in the *Ciesluk* opinion. I also agreed to be a co-signee on two amici briefs filed in the *LaMusga* case (Warshak et al.; Shear et al.).

The point of the above review of the literature and differing perspectives on relocation is to understand that relocation is an extraordinarily complex issue when child development, social policy, and scientific research are considered so a balanced approach seems to be the wisest course for a model statute. The research findings with aggregate data create a framework of working knowledge on the problem, but each relocation case requires an individualized assessment and careful investigation of the facts. Several appellate opinions point out there is no “bright line” rule to resolve the issue for a given family. The decision maker needs to determine if the facts exceed the threshold of harm for the child on the relocation issue. The model statute proposed by AAML (1997) proposed a presumption for relocation as one way to go and I strongly recommend against this approach. It just goes down the path that California entered and Colorado followed. California has attempted to reverse the presumption approach of *Burgess* by the *LaMusga* decision and Colorado eliminated *Francis* by a statute with no noticeable dissent.

² This psychologist reviewed a custody report by a well known Denver evaluator who documented in his report how he tried to talk the mother out of relocating from Denver to Houston because the child was just too young. The case ended with the Court approving the relocation and the father also moved to Houston.

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In clarifying the Colorado relocation statute and to emphasize the even playing field, best interests approach, the Colorado Supreme Court in *Ciesluk* (at 146) noted in citing *Jaramillo v. Jaramillo* (N.M.) “procedure by presumption is always cheaper and easier than individualized determination”.³ It should be noted that when New Jersey moved to a presumption or burden proof placed on the non-moving parent in *Baures v. Lewis* (2001) the social science research cited almost exclusively duplicated the studies cited in the Wallerstein brief in *Burgess*⁴ which was subsequently rejected in *LaMusga*.

The main point of contention in social policy analysis and appellate briefs always concerns the issue of whether a legal presumption is necessary or how to assign the burden of proof (i.e., standard of persuasion). There does not seem to be disagreements over the list of factors to be considered as relevant to consider. This observer strongly endorses the idea of no legal presumption and a shared burden of persuasion within a legal standard of the best interests of the child. Courts can be made aware of a balanced description of the relevant scientific research without creating a presumption. Courts are aware of the social policy issues that surround relocation and how difficult these cases are. It would seem the committee for the URCA would want to consider if the issues of constitutional analysis and the need to balance the interests of both parents and children need to be discussed in the commentary as some state high court opinions have done [*Ciesluk; Jaramillo, Watt v. Watt*, 971 P.2d 608 (Wyo. 1999)]. There also seems to be gap in the legal landscape on the issue of how to treat relocation in the pre-decree context vs. post-decree. I am aware only of one case that has addressed this issue [*Spahmer v. Gullette*, 113 P.3d 158 (Colo. 2005)].

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1. Concerning Distance, p. 5.

The 50 mile rule would be a compromise. I believe several states (AZ, IL) have a 100 mile rule which would mean by law the social policy is to view moving by a custodial parent and child 99 miles or less is not a legal relocation. Commentators propose that moves of a much shorter distance in a large urban area are likely to cause a substantial disruption in the parent-child relationship (Shear, 1996). Research shows that nonresidential fathers are likely to fade from the child’s life if there is move of more than a comfortable day trip (Hetherington & Kelly, 2002). A striking example of the issue with distance is that the facts in the California *Burgess* case show the move was 40 minutes (Telechapi to Lancaster). Colleagues have relayed to me that the time x distance calculus is important in urban areas. Jeff Siegel, Ph.D. remarked that the drive from one part of Dallas-Fort Worth to another part might take as long as going to the airport and flying to Denver. I consulted on a high profile case where the relocation was Long Island in the Hamptons to Manhattan. A Denver evaluator treated moving from one part of

³ *Ciesluk* drew upon the New Mexico court that conducted a constitutional law analysis of the relocation issue (*Jaramillo v. Jarmillo*, 823 P.2d at 307-309) that cited *Stanley v. Illinois*, 405 U.S. 645, 92 S.Ct. 1208 and a famous quote by Justice Byron White on presumptions. *Jarmillo* also stated: “Allocating burdens and presumptions in this context does violence to both parents’ rights, jeopardizes the true goal of determining what in fact is in the child’s best interest, and substitutes procedural formalism for the admittedly difficult task of determining, on the facts, how to best accommodate the interests of all parties before the court, both parents and children” (at 307).

⁴ The one exception ironically was a study that showed the negative effects on children due to relocation (Wood et al., 1993) though the study did not control for type of family structure.

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Denver to another (about 20 minutes) as requiring a relocation analysis under the statute. The Court agreed with me that this was ridiculous. So the legal definition of what constitutes “relocation” can be ambiguous and problematic. 50 miles in my area of the county in the rural West is not a big deal. 50 miles in metropolitan Denver (i.e., Denver to Colorado Springs) constitutes a substantial change in the life of the child.

The committee might consider the wording of a move in the Colorado statute: “that substantially changes the geographical ties between the child and the other party” as one that gives the court the needed degree of flexibility to exercise judicial discretion on what exactly comprises relocation for the child.

2. Notice and the exception to not disclosing proposed location when there is domestic violence, p. 7

I like the wording on safety and endangerment rather than using domestic violence as a presumptive exclusion, but I endorse the inclusion of domestic/partner violence as a factor to consider in relocation. The reason for the advantage to the demonstrated safety wording has to do with the most recent formulation of the issue of considering intimate partner violence and child custody to take into account subtypes of partner violence (Austin, 2001; Johnston & Campbell, 1993) in a process of differentiation (Kelly & Johnson, 2008; Jaffe, Johnston et al., 2008). An obvious practical complication is how to arrange for parenting time schedule if the new location of the child is not known?

3. Issue of Notice if the nonresidential parent has previously moved to another state (per N.D.)

The prototype of the relocation case and scenario is when a residential parent wants to move to a distant community with the child and away from the other parent. The key terminology may be if there is relocation and it would significantly impact the parenting time/access of the nonresidential parent even if that other party was already living in a separate community. It would seem the remedy for the already distant nonresidential parent would be to file for a modification to preserve the parenting plan arrangement/access, but not to treat it as a relocation case. I’ve done an evaluation with such a fact pattern. The nonresidential parent opposed the mother relocating from Colorado to Georgia even though the father had moved to Wyoming. The father was using the mother’s remarriage to a military man as a way to try to gain custody.

4. Regarding third parties who have standing due to caregiving responsibilities, p. 8

The wording in the AL statute that third parties cannot object to relocation but can file for a change in access arrangements would seem to invite vindictive motives by the moving parent who is at odds with the ex-inlaws.

5. Burden of Proof, p. 9

As my discussion above indicates, this is area where there is most disagreement and where politics and polemics get interjected. I approve of the position taken by the Reporter. It is consistent with the most recent state case law and much of the statutory law (Goldfarb; Ciesluk; Dupré). Let's not revisit the California morass on presumptions. Lets follow *Stanley v. Illinois; Troxel*. It is the even playing field approach.

6. The Draft has a best interests plus factors to consider approach, p. 10

I endorse this approach. It is found in so many prominent cases (i.e., *Tropea v. Tropea*, 665 N.E.2d 145 (1996)). I question the wording on domestic violence that includes "threats of domestic violence." This would be difficult to define and it usually is included in definitions of domestic violence and would fall under harassment as a legal category that often is what a partner pleads guilty to in a prosecution. It is part of what an evaluator would investigate in a case. I agree with the spirit of the wording, but it may become problematic and just not be necessary.

7. "Quality of Life" under reasons for moving, factors #5-6

I feel this term is too ambiguous even though it may be gleaned from case law opinions. I recommend the alternative terms of advantages to the child, including indirect advantages through benefit to the moving party.

The Reporter's comments on trying to keep the list of factors manageable is noted. The CO statute contains 9 relocation factors. Ones to consider that may not be covered are: "any advantages to remaining with the primary caretaker" and "the anticipated impact of the move on the child." Some observers might have problems with the use of primary caretaker term since it is an over-used concept in both legal and mental health circles in the child custody context. Children who may be moving almost always have multiple attachments and are usually equally attached to both parents (see Kelly & Lamb, 2003 on relocation and very young children).

8. On factor #7, "preserve" in considering how suitable a proposed new alternative parenting time schedule is

I suggest considering wording such as "sustain meaningful involvement and quality in the child-nonmoving parent."

9. On factor #8, concerning both parties relocating

There are concerns if the court can consider all four decisional alternatives when deciding the relocation issue. Can it consider if the moving parent would not move without the child? If the non-moving parent would also move if the relocation is allowed? There are constitutional issues here (*Ciesluk*) and the AAML model statute indicated it would be prejudicial to consider the issue of the moving parent would move with the child, or not, and that it was prejudicial either way.

It is well known that after the relocation is decided that many nonresidential parents also move and follow the child. It is not appreciated that it is not so unusual that the moving parents do indeed move without the child when relocation is denied. There just may not be realistic flexibility on this issue. So there would be a change in primary custody.

I agree the *D'Onofrio* factors are still relevant and are reflected in state laws. Michigan adopted the four factors and then added domestic violence as a fifth.

I'm sure there will be discussion of some other factors as beneficial while being sensitive to the issue of overloading the court. In Colo the Supreme Court stated (*Ciesluk*) that the trial court will explicitly consider all 20 statutory factors, 11 best interests factors and 9 relocation factors.

10. More on factors: regarding domestic violence

I'm not sure the term of "how recent" helps, but the intent is sound. The committee may want to consider the wording of "differentiation" (which means subtypes, seriousness) and "continuing residual behaviors associated with intimate partner violence." It may be that recent is helpful but some other wording should be added. It is not unusual for the DV issue to be interjected as a justification for relocation even when the subtype was mild in severity and there has been a stable parenting plan in place for years. I gave a workshop on domestic violence and relocation at AFCC in 2006 with Dr. Leslie Drozd. It is a complicated topic and usually produces heated discussion. I do agree the DV/IPV should be a relocation factor. I did a recent evaluation in Denver where I uncovered that there had been PV with physical aggression in the marriage and two of dad's previous relationships and harassment one other with the mother of his other child. The court did not want to allow relocation because the great job that had been waiting for mom no longer was available. If IPV had been a relocation factor and disclosure of location was not necessary then relocation should have been allowed.

11. Regarding Remedies

It should be understand how difficult it is to mediate relocation disputes. There is little room to compromise. Either the parent moves or s/he doesn't. Mediators tell me what can be done is to work with the parents on parenting plans that can be implemented depending on how the court decides.

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**Appendix: Austin publications and professional presentations on
Relocation and Child Custody Publications**

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Child Custody Evaluation and the Uniform Relocation of Children Act: Legal and Psychological Perspectives. Association of Family and Conciliation Courts, 46th Annual Conference: Children, Courts and Custody: Back to the Future or Full Steam Ahead? New Orleans, May 29, 2009 (with Professor Jeff Atkinson, Esq.)

Social Capital and Integrated Approach to Child Custody Evaluation: Application to Relocation. Association of Family and Conciliation Courts, Eighth International Symposium on Child Custody Evaluations. Albuquerque, New Mexico, September 26, 2008 (with Jonathan W. Gould, Ph.D., ABPP).

Legal and Clinical Issues in Cases of Relocation. Reconceptualizing Child Custody: Past, Present, and Future – Lawyers and Psychologists Working Together. Cosponsored by American Psychological Association (APA) and American Bar Association (ABA). Chicago, May 3, 2008 (with Professor Jeffrey Atkinson)

Relocation and Child Custody: Research & Forensic Evaluation. Mississippi College of Law. November 10, 2006. Jackson, MS.

Custody Evaluation and Parenting Plans for Relocation: Risk Assessment for High Conflict or Partner Violence. Association of Family and Conciliation Courts, 43rd Annual Conference, June 1, 2006, Tampa, FL. (with Leslie M. Drozd, Ph.D.).

Parenting Evaluation for the Relocation Case in Light of the New Case Law. 2006 Family Issues Conference, Colorado State Judicial Department, Vail, CO, May 19, 2006.

Evaluation of the Relocation Case and Crafting Long Distance Parenting Plans. Association of Multidisciplinary Professionals Serving Families, Colorado Springs, CO, March 10, 2006.

Relocation from the Evaluator's Perspective in the Shadow of Spahmer and Ciesluk. Workshop, Child and Family Investigator's Workshop, Sponsored by 9th Judicial District of Colorado and Colorado Mountain College, Glenwood Springs, CO, December 16, 2005.

Relocation from the Evaluator's Perspective in the Shadow of Spahmer and Ciesluk. Workshop, Domestic Salon, 4th Judicial District of Colorado, Colorado Springs, CO, October 4, 2005.

A Practical, Research-Based Approach to Evaluating the Relocation Case. Workshop for Association of Family and Conciliation Courts, Regional Training Conference. September 23, 2005, Breckenridge, CO.

Comments on Draft of *Uniform Relocation of Children Act*, National Conference of Commissioner's on Uniform State Laws, submitted by William G. Austin, Ph.D. for meeting on URCA, October 10-11, 2008, Grapevine, TX

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Your Honor May I? – A discussion regarding “Relocation.” Plenary Session, Family Law Institute, Colorado Bar Association, Breckenridge, CO, August 5, 2005 (with Jennifer Weaver, J.D. & Hon. Lael Montgomery).

Evaluating the Child Custody Relocation Case: An Integrated Approach, presentation at Family Issues Conference, Colorado state judicial conference, Vail, CO, May 5, 2005.

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An Integrated Approach to Evaluating the Relocation Case. Family Law Institute, Colorado Bar Association, Steamboat Springs, CO, August 7, 2004.

Mediator's Role for the Child Custody Relocation Case, Workshop, Association for Conflict Resolution, Denver, July 12, 2003.

Removal – Evaluation and Determination, Workshop, State of Colorado Interdisciplinary Committee, Vail, CO, May 3, 2003 (with Magistrate Jann Dubois)

A Practical Approach to Evaluation and Conflict Resolution in Child Custody Relocation Cases, Pre-Conference all day Institute, Association of Family and Conciliation Courts: Fifth International Symposium on Child Custody Evaluations, November 7, 2002, Tucson, AZ. (with Jonathan W. Gould, Ph.D. & Leslie Ellen Shear, J.D.)

Approaching Relocation Cases: Risk Assessment, Research, and Practical Problem Solving. Workshop presented at “Serving the Best Interests of the Child,” Sponsored by Office of the Child’s Representative, State of Colorado, January 10, 2002, Steamboat Springs, CO.

Evaluating and Litigating the Removal Case (with Rick Loman, J.D.), Colorado Interdisciplinary Committee (State IDC) on children and divorce, Spring Conference, Challenging Conventional Wisdom on Divorce, Parenting Time and Removal, Breakout Session, May 5, 2001, Vail, CO. [Co-Sponsored, MDIDC and Colorado Chapter American Academy of Matrimonial Lawyers.]

Relocation: Risk Assessment and Bridging the Gap between the Law and Science, Panel: *Handling of a Relocation Case: Substantive Law and Mental Health Perspective.* American Bar Association, Section of Family Law, April 19, 2001, Kansas City.

Psychological and Legal Considerations in Relocation Cases. Association of Family & Conciliation Court, Kiawah, SC, Fourth International Congress on Child Custody Evaluations, November 10, 2000, Workshop,

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Relocation: From File to Trial. (With Linda Elrod, J.D., Larry Fong, Ph.D., Lori Nachlis, J.D.). Association of Family & Conciliation Courts, New Orleans, 37th Annual Conference: *Alienation, Access & Attachment*, May 31, 2000, All Day Training Institute.