THE GOOD MOTHER: A NEW LOOK AT PSYCHOLOGICAL PARENT THEORY

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INTRODUCTION

Psychological parent theorists argue that a child is inevitably and deeply harmed by separation from a primary caregiver and by any interference with that caregiver's parental authority.[1] Working from this premise, Joseph Goldstein, Anna Freud, and Albert J. Solnit[2] urge that child welfare policies and laws be reformed to protect children against disruption of psychological parent relationships and against any contact (in the form, for

    1. JOSEPH GOLDSTEIN, ANNA FREUD & ALBERT J. SOLNIT, BEYOND THE BEST INTERESTS OF THE CHILD 31-34 (1973) [hereinafter BEYOND THE BEST INTERESTS]. Psychological parents are defined as persons who provide uninterrupted day to day care to a child for minimum periods that vary depending on the age of the child. *Id.* at 17-19.
    2. Since Anna Freud's death, Professor Sonja Goldstein has joined Professors Joseph Goldstein and Albert J. Solnit in the publication of works advocating psychological parent principles. *See, e.g.,* JOSEPH GOLDSTEIN, ANNA FREUD, ALBERT J. SOLNIT & SONJA GOLDSTEIN, IN THE BEST INTERESTS OF THE CHILD: PROFESSIONAL BOUNDARIES (1986).

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example, of court-ordered visitation) unwanted by the psychological parent. They counsel non-interventionist policies to deter unnecessary disruptions of families of origin,[3] but once disruption has occurred, they counsel action to protect the dyadic relationship between each child and the "psychological parent" then providing day to day care.[4]

The recommendations of Goldstein, Freud and Solnit have never been closely followed in contexts of deciding whether to remove a child from her home for placement in foster or orphanage care. Poor families, the only families that receive close supervision from child protective systems, are often disrupted without adequate attention to the harms of family separation.[5] But once children come into care, the Goldstein, Freud and Solnit recommendations are enthusiastically embraced.

In the years following publication of the Goldstein, Freud and Solnit prescriptions, "permanency planning" became a preoccupation of child welfare; if a foster child could not be swiftly returned to her family of origin, parental rights were to be terminated so that the child could find permanence through adoption. As a result of permanency planning mandates, terminations of parental rights skyrocketed.[6] But termination proved to be an uncertain route to permanence.[7] Martin Guggenheim's recent empirical analysis of termination of parental rights in Michigan and New York reveals that "[t]he number of children freed for adoption goes up every year; the number of children adopted fails to keep pace with the number of adoption-eligible children; and the total number of orphaned children not adopted continues to increase fastest of all."[8] The number of unadopted children whose parental rights had been legally severed rose in Michigan from approximately 1,700 in 1986 to 3,030 in 1992, a seventy-three percent increase.[9] In New York, the numbers of children freed for adoption but not adopted rose from 648 in 1987 to 2,383 in 1991, a 225% increase.[10]

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3. JOSEPH GOLDSTEIN, ANNA FREUD & ALBERT J. SOLNIT, BEFORE THE BEST INTERESTS OF THE CHILD 15-18 (1979) [hereinafter BEFORE THE BEST INTERESTS].

4. *Id.* at 39-51.

5. *See*, Peggy Cooper Davis and Gautam Barua, *Custodial Choices for Children at Risk: Bias Sequentiality and the Law*, 2 UNIVERSITY OF CHICAGO LAW SCHOOL ROUNDTABLE 139 (1995) (discussing the risks of error in child welfare decisionmaking).

6. Peggy C. Davis, *Use and Abuse of the Power to Sever Family Bonds*, 12 N.Y.U. REV L. & Soc. CHANGE 562 (1984) (reporting an increase in New York State terminations of parental rights from 92 in 1968 to 1,719 in 1980).

7. Martin Guggenheim, The Effects of Recent Trends to Accelerate the Termination of Parental Rights of Children in Foster Care — An Empirical Analysis in Two States 9 (1995) (on file with *New York University Review of Law and Social Change*).

8. *Id.* at 14. *See also* Margaret Beyer & Wallace Myniec, *Lifelines to Biological Parents: Their Effect on Termination of Parental Rights and Permanence*, 20 AM. L. QUART. 233 (1986).

9. Guggenheim, *supra* note 7, at 11.

10. *Id.* at 13.

One might imagine that severance of legal ties to an absent parent would yield benefits without regard to the likelihood of adoption. There is, however, no evidence that this is so.[11]

In the pages that follow, I want to evaluate the theoretical assumptions that have led to the dismemberment of so many families in an often unavailing quest for permanence and emotional stability. I want to look behind the argument that children need, above all else, the uninterrupted nurturance of one psychological parent. I want to discover why the argument has had such influence. And I want to invite focus upon issues that psychological parent theory tends to obscure.

The discussion will proceed as follows: I will first sketch out the elements of psychological parent theory and review its bases. I will then turn to empirical research that is more extensive and less culture-bound than that available when psychological parent theory was developed, and to psychoanalytic theory that is grounded in the experiences of caregiving and the perspectives of mothers. I will use these resources in an effort to persuade you that child welfare planning should be redirected to take account of two developments in the human sciences: 1) rejection of the monotropic view of child development in favor of a family system view, and 2) a growing conviction that cognitive and emotional growth require encouragement

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11. I have found no recent study directly addressing the adjustment of foster children as it might be affected by termination of legal ties to their parents. There is, however, some evidence bearing on the related question of whether children in care are emotionally attached to foster parents and to their families of origin. Not surprisingly, it reveals that children in care remain attached to both. Ainsworth and other attachment researchers have consistently found that even abused or neglected children maintain strong, if insecure and anxious, attachments to their original caretakers. M. D. S. Ainsworth, *Attachment and Child Abuse, in* CHILD ABUSE: AN AGENDA FOR ACTION 35 (George Gerbner, C.J. Ross & E. Zigler eds. 1980); P.M. Crittenden & M.D.S. Ainsworth, *Attachment and Child Abuse, in* CHILD MALTREATMENT: THEORY AND RESEARCH ON THE CAUSES AND CONSEQUENCES OF CHILD ABUSE AND NEGLECT 432 (D. Cicchetti & V. Carlson eds., 1989); Byron Egeland & L. Alan Stroufe, *Attachment and Early Maltreatment,* 52 CHILD DEV. 44 (1981); T.J. Gainsbauer & R.J. Harmon, *Attachment Behavior in Abused/Neglected and Premature Infants: Implications for the Concept of Attachment, in* THE DEVELOPMENT OF ATTACHMENT AND AFFILIATIVE SYSTEMS 263 (R.N. Emde & R.J. Harmon eds., 1982). The earlier findings of David Fanshel and Eugene Shinn that most foster children are bonded both to their foster families and to their families of origin in DAVID FANSHEL & EUGENE B. SHINN, CHILDREN IN FOSTER CARE: A LONGITUDINAL INVESTIGATION 377 (1978) are somewhat reinforced by a later study indicating that while 74% of children in care were strongly identified with the foster family, 60% maintained emotional attachments to the family of origin. John E. Poulin, *Long Term Foster Care, Natural Family Attachment and Loyalty Conflict,* 91 J. SOC. SERVICE RES. 17 (1985). A study of the relationship between foster children's attachments to adult figures and the presence or absence of behavior problems found that "the quality of attachment to both foster parents was significantly more positive than attachment to either natural parent," but that the intensity of the children's (positive or negative) attachments was the greatest for the biological mother. Physical attachment measures, apparently based upon child interviews, were the same for foster father, biological mother, and biological father, and only slightly higher for the foster mother. Robert F. Marcus, *Attachments of Children in Foster Care,* 117 GENETIC, SOC. & GEN. PSYCHOL. MONOGRAPHS 367, 380 (1992).

of child-caregiver relationships in which the child learns to recognize and accept the autonomy of others. The first development teaches us that children can — and should — have multiple bonds. The second development teaches us that the inevitability of separations can be managed consciously and used constructively in the maturation process. I will rely on these teachings to argue that we should abandon single-minded focus on preserving a primary bond in favor of acknowledging — and allowing children to acknowledge — the full network of kin attachments, whether they are old or new, and whether they can promise to be interrupted.

I.
PSYCHOLOGICAL PARENT THEORY AND ITS BASES

Psychological parent theory parallels the work of attachment theorist John Bowlby. Bowlby's enduring and increasingly appreciated[12] theoretical contribution to the understanding of child development was his recognition that healthy growth depends upon social interaction as well as upon physical care — that attachment behaviors are not, as Sigmund Freud had argued, secondary to the gratification of physical needs, but are evidence of a primary need for social interaction.[13] For reasons that may have more to do with Bowlby's personal and cultural perspectives than with the logic of his analysis,[14] this theoretical insight was stimulated by, and developed in relation to, studies of childhood separation trauma. Significant among these studies were the observations of Dorothy Burlingham and Anna Freud during their experiences caring for children sheltered in residential nurseries to escape war and Nazi persecution, as well as studies in the 1950's and 1960's of English children undergoing residential care as a result of maternal hospitalization or homelessness.[15] Bowlby's work was not, however, grounded exclusively in data concerning separations that were extended or traumatic. Detailed elaborations of the effects of everyday

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12. *See, e.g.*, JESSICA BENJAMIN, THE BONDS OF LOVE: PSYCHOANALYSIS, FEMINISM,, AND THE PROBLEM OF DOMINATION 17 (1988) [hereinafter BONDS OF LOVE] (arguing that Bowlby, together with object relations theorists, "offered psychoanalysis a new foundation: the assumption that we are fundamentally social beings.").

13. JOHN BOWLBY, ATTACHMENT, 1 ATTACHMENT AND LOSS 216-220 (1969) [hereinafter BOWLBY, ATTACHMENT]. For an excellent description of attachment theory, its influences, and its shortcomings, see Marinus H. van IJzendoorn & Louis W.C. Tavecchio, *The Development of Attachment Theory as a Lakatosian Research Program: Philosophical and Methodological Aspects, in* ATTACHMENT IN SOCIAL NETWORKS: CONTRIBUTIONS TO THE BOWLBY-AINSWORTH ATTACHMENT THEORY 3, 6-12 (Louis W.C. Tavecchio & Marinus H. van IJzendoorn eds., 1987) [hereinafter IJzendoorn & Tavecchio, ATTACHMENT IN SOCIAL NETWORKS].

14. *Id.* at 8-10 (concluding that "[s]ocial factors (the First World War), intellectual climate (the development of an unorthodox British variant of psychoanalysis), and personal experiences . . . form in brief the foundation of Bowlby's preoccupation with attachment relationships, separation and loss.")

15. JOHN BOWLBY, SEPARATION, 2 ATTACHMENT AND LOSS 24-34 (1973) [hereinafter BOWLBY, SEPARATION]; BOWLBY, ATTACHMENT, *supra* note 13, at 3-24.

separations were being developed in a large body of influential work pioneered by M. D. S. Ainsworth.[16] Bowlby, and other students of human attachment and child development, drew heavily upon the Ainsworth research. They thought the reactions of young children to the inevitable, brief separations of everyday life were of a kind with longer term and crisis-related separations.[17] Bowlby described them as prototypes of human sorrow and keys to the understanding of a variety of human sufferings.[18] As a result of the linking of everyday and crisis-related separations, attachment theorists seemed to portray virtually all child-caregiver separations not initiated by the child as comparable and poignant harms.[19]

Although attachment theorists addressed in their early work separations that varied in duration and circumstance, they were constant in their choice of the object in terms of which the child would count herself separated or whole: it was the mother. Early attachment research focused almost exclusively on mother-child separations, giving little or no attention to the effects of separation from fathers, siblings, and other caregivers. This focus was justified by what Bowlby described as the child's natural monotropism — its tendency to select, and to be possessive of, a principal attachment figure who, in the cultures Bowlby focused upon, was usually, but not always, the mother.[20]

Although Bowlby saw mother-child separation as the prototype of human sorrow and the key to understanding a wide range of human emotional disturbance,[21] he was somewhat cautious concerning the implications of studies of separation trauma and the prognosis for children who experienced separations.[22] Psychological parent theorists were more confident.

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16. For descriptions of this work, see BOWLBY, SEPARATION, *supra* note 15, at 39-47.

17. *See id.* at 30-31 (describing the relevance of "the comparable [to responses to long term separations in times of trauma] but far less intense responses that are to be seen in young children during the course of everyday living.").

18. *Id.* at 30-56.

19. *See, e.g., id.* at 3-24, 33-56.

20. *See* BOWLBY, ATTACHMENT, *supra* note 13, at 308-09 (arguing that although children have multiple bonds, "there is a strong bias for attachment behavior to become directed mainly towards one particular person and for a child to become strongly possessive of that person."). For a discussion of recent research discrediting the monotropic view, see *infra* notes 36-75 and accompanying text.

21. *See* BOWLBY, ATTACHMENT, *supra* note 13, at 3.
"When removed from mother by strangers young children respond usually with great intensity; and after reunion with her they show commonly either a heightened degree of separation anxiety or else an unusual detachment. Since a change in relations of one or other of these kinds, or even of both compounded, is frequent in subjects suffering from psychoneurosis and other forms of emotional disturbance, it seemed promising to select these observations as a starting-point; and. . .to 'follow it up through the material as long as the application of it seems to yield results.'"
Id. at 3 (quoting SIGMUND FREUD, REPRESSION (1915), *reprinted in* 14 THE COMPLETE PSYCHOLOGICAL WORKS OF SIGMUND FREUD).

22. *See* BOWLBY, SEPARATION, *supra* note 15, at 5 ("[M]ost children who have had experiences of these kinds recover and resume normal development, or at least they appear

They argued that children have "a marked intolerance for postponement of gratification or frustration, and an intense sensitivity to the length of separations."[23] They regarded "[c]hanges of parent figure" as "hurtful interruptions" in the child's development that would lead it to "regress[ ] along the whole line of. . .affections, skills, achievements, and social adaptation."[24] They argued that children lack the capacity to "maintain[ ] positive emotional ties with a number of different individuals [who are] unrelated or even hostile to each other," and, taking a position consistent with Bowlby's theory of monotropy, concluded that children need, above all else, to be under the exclusive authority and constant care of a primary psychological parent.[25]

Psychological parent theorists made the child the active participant in the developmental work (as opposed to the physical, nurturing work) occurring within the child-caregiver dyad.[26] In this respect, they held Sigmund Freud's focus upon attachment as a byproduct of the quest for physical gratification, rather than Bowlby's focus on social interaction as an independent need. The caregiver, or mother, was characterized as a solid source of support and affection — as symbol and assurance of gratification — rather than as a developmental catalyst. Psychological parent theorists acknowledged, but did not emphasize, the fact that interaction with a caregiver stimulates development.[27] Their policy prescriptions built upon the belief that the child's developmental initiatives are painful and therefore "need[ ] to be offset by stability and uninterrupted support from external sources."[28]

Psychological parent theorists traced the developmental harms of separation from infancy through adulthood, arguing that at each phase of growth separations impaired the child's successful accomplishment of age-appropriate developmental tasks by removing the context of security and uninterrupted support out of which the child might comfortably take developmental initiatives. In describing the hypothesized harms of separation in infancy, psychological parent theorists seemed to take the concept of "uninterrupted support" quite literally. Consistent with attachment theorists'

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to do so. Not infrequently, therefore, doubts are expressed whether the psychological processes described are in reality related so intimately to personality disturbances of later life. Pending much further evidence, these are legitimate doubts.").

23. BEYOND THE BEST INTERESTS, *supra* note 1, at 11.

24. *Id.* at 18.

25. *Id.* at 12.

26. This failure to attribute intellectual work to the mother was characteristic until the last decade of virtually all theoretical analyses of infant and child development. *See* Sara Ruddick, *Thinking Mothers/Conceiving Birth, in* REPRESENTATIONS OF MOTHERHOOD 29, 29-33 (Donna Bassin, Margaret Honey & Meryle Mahrer Kaplan, eds. 1994) [hereinafter REPRESENTATIONS OF MOTHERHOOD] (describing the failure of theorists to conceive the mother as a thoughtful, social being).

27. *See* BEYOND THE BEST INTERESTS, *supra* note 1, at 18 (acknowledging the child's "demands for affection, companionship and stimulating intimacy").

28. *Id.* at 32.

tendency to equate everyday and traumatic separations, psychological parent theorists argued that in infancy, "any change in routine" was harmful, "even if the infant's care is divided merely between mother and baby-sitter."[29] Infants and toddlers "abandoned by the parent" became incapable of emotional attachment.[30] For young children, "separation from the familiar mother" or "the psychological parent" was said to cause regressions in such achievements as toilet training and the development of speech.[31]

Although the empirical research supporting attachment theory was based primarily upon research concerning infants and toddlers, and, to a lesser extent, upon research concerning preschool children,[32] psychological parent theorists extended their analysis to argue that later separations are not only the distressing echoes of the prototypical mother-loss experienced by infants unable to anticipate return, but also a source of independent developmental harm. School-age children who "feel[ ] abandoned" by their psychological parents were said to fail to identify with those parents, causing a break in super ego development with resultant antisocial or criminal behavior.[33] The harm caused to adolescents by separation was not explicitly explained in terms of developmental tasks, but it was said that the adolescent's attainment of an individual identity (the developmental task most prominently associated with adolescence) depended upon ever-available caregivers from whom the adolescent separated only upon his or her own initiative: "For a successful outcome it is important that the breaks and disruptions of attachment should come exclusively from. . .[the child's] side and not be imposed on him by any form of abandonment or rejection on the psychological parents' part."[34]

Implicit in this description of the harms of separation is a model of ideal parenting — a model in which maternal images loom large. If infants are harmed by "any change in routine," including the division of care between mother and baby-sitter, and young children are harmed by any separation from "the familiar mother," then the ideal parenting arrangement for infants and young children must be an omnipresent mother.

In describing the harms flowing from separation experiences of children over six, psychological parent theorists began to speak of parents in the plural, shifting from an implicit focus upon the dyad of child and single, maternal caregiver to an implicit focus upon the nuclear family triad. School-age children are harmed, psychological parent theorists contended, if they feel abandoned by their parents, and adolescents are harmed if they feel unable to control the process of separation. The implicit ideal is a

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29. *Id.*
30. *Id.* at 32-33.
31. *Id.* at 33 n.1.
32. *See* BOWLBY, SEPARATION, *supra* note 15 and accompanying text.
33. BEYOND THE BEST INTERESTS, *supra* note 1, at 34 n.2 (citing the social history of a condemned murderer as recited in a judicial opinion).
34. *Id.* at 34.

mother and father who, like the mother of the child's younger years, are as available as the child feels they should be.

Despite the positing of a triad as the parenting ideal for older children, psychological parent theorists argued, as we have seen, that in the event of family disruption, it is in the best interests of children, not to restore or replace each leg of the triad (or to restore the original dyad), but rather to give legal recognition and permanence to a dyad consisting of the child and the adult who, in the immediately preceding period, was most responsible for the child's day to day care and supervision. The restorative ideal, like the maternal ideal, is a figure who will provide perfect "[c]ontinuity of relationships, surroundings and environmental influence."[35]

II.
NEW GROUNDS FOR MODIFICATION OF THE THEORY

We have seen that psychological parent theory rests on the assumption that separation per se causes lasting psychological harm to children. There is no definitive study that tells us whether this is so. Two developments in recent literature do, however, offer guidance. These developments do not begin to answer the question whether children are in need of continuous caregiving above all else; they help us to see why that is the wrong question. And they help us to see why we have asked for so long a question that could not have been answered and may not have mattered to the best interests of our children. The first development is the emergence of a consensus within the human sciences that a child's security comes not from a single, constant individual, but from a familiar milieu and a network of attachments. The second development is the emergence of informed and realistic answers to the question posed in the 1960's by a thoughtful child development specialist who argued: "[W]e don't know what a 'good mother' is supposed to do nor how a 'good' child should respond to her."[36] Let me discuss these two developments in turn and then attempt to show how they are related and what implications they hold for child welfare policy.

A.   The Developmental Milieu

Some child development experts have long insisted that children are dependent on a network of attachments existing within a family (or extended family) milieu, rather than on a single psychological parent. The Group for the Advancement of Psychiatry (GAP) was the most prominent early advocate of this view. Based on the clinical experiences and theoretical assumptions of its members, GAP argued in 1980 that there was "no evidence for the existence of a single 'psychological parent' with whom the

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35. BEYOND THE BEST INTERESTS, *supra* note 1, at 31.
36. Juanita Chambers, *Maternal Deprivation and the Concept of Time in Children*, 31 AM. J. ORTHOPSYCHIATRY 406, 417 (1961) (comment by Dr. P. Wolf).

tie is critically more important than with the rest of the [child's affiliational] network" and that children were at risk for adverse emotional consequences when any part of their network was lost.[37]

The broader consensus that milieu is more fundamental than the mother bond has come as a result of a number of convergent research findings. It has grown out of empirical work concerning basic attachment theory, a growing body of research concerning the nurturing tasks of fathering, extensive research concerning the attachments and adjustments of children of divorced parents, and cross-cultural comparisons of child-caregiver interactions.

1. Attachment Research

In order to describe this development, it is necessary to provide some background concerning the investigation of attachment behaviors. I have said that attachment theory was greatly influenced by M. D. S. Ainsworth's systematic investigations of everyday separations.[38] Ainsworth recorded the behavior of very young children as they interacted with their mothers and then were introduced to strangers, left briefly in the strangers' care, and returned to the care of their mothers. In the course of this research, Ainsworth observed distinct types of reactions to mother-child separation and reunification.[39] Some of these reaction patterns were deemed indicative of insecure attachments to the mother; others were deemed indicative of secure attachments. At the risk of gross oversimplification, it can be said that attachments are deemed insecure if the child reacts too much or too little to an everyday separation and secure if the child's reaction is moderate, involving neither avoidance of the familiar caregiver or clinging upon the caregiver's return. Subsequently, it was discovered that insecure reaction patterns correlated with behavioral and adjustment problems, while secure reaction patterns correlated with an absence of those behavioral and adjustment problems.[40]

The Ainsworth measures of attachment quality have now been used widely and in a range of cultural settings.[41] Increasingly, they have been

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37. COMMITTEE ON THE FAMILY OF THE GROUP FOR THE ADVANCEMENT OF PSYCHIATRY, NEW TRENDS IN CHILD CUSTODY DETERMINATIONS 80-81 (1980).

38. *See supra* notes 16-19 and accompanying text.

39. The number and definitions of the types have varied as the research has continued. For a description of both the older and the newer categories, see Marinus H. van IJzendoorn, Susan Goldberg, Pieter M. Kroonenberg & Oded J. Frenkel, *The Relative Effects of Maternal and Child Problems on the Quality of Attachment: A Meta-Analysis of Attachment in Clinical Samples,* 63 CHILD DEV. 840 (1992) [hereinafter *Meta-Analysis II*].

40. *See id.* at 854.

41. *See id.* at 843 (meta-analysis of thirty-four clinical studies on attachment); Kathleen J. Sternberg & Michael E. Lamb, *Evaluations of Attachment Relationships by Jewish Israeli Day-Care Providers,* 23 J. CROSS-CULTURAL PSYCHOL. 285 (1992); Marinus H. van IJzendoorn & Pieter M. Kroonenberg, *Cross-Cultural Patterns of Attachment: A Meta-Analysis of the Strange Situation* 59 CHILD DEV. 147 (1988) [hereinafter *Meta-Analysis I*];

used to assess the quality of children's attachment to caregivers other than the mother.[42] As a result, it has been determined that children can be securely attached (as Ainsworth defines the concept) not only to their mothers, but also to their fathers[43] and to other caregivers.[44] "Infants form attachments with many people, including fathers, siblings, and babysitters. [Moreover]. . .many of these relationships can be characterized as secure."[45]

2. Research Concerning the Father Bond

The Ainsworth measures of attachment quality are, of course, limited in that they are applicable only to older infants and toddlers and test only a narrow aspect of the child's relationships.[46] Investigations into the roles and relationships of fathers have considered a wide range of evidence to assess the quality of children's bonds to men who are, and men who are not, primary caregivers. These studies provide evidence both of the capacity for, and of the fact of, close, nurturing relationships between fathers and children of all ages. They therefore support the conclusions that children of all ages may be bonded to both of their parents and that both bonds can be important to their emotional well being. Fathers have been found "capable of emotionally responsive, nurturant caregiving" and of "biorhythmic synchronicity" during their children's first three months.[47] Fathers have been found to evoke little or no stranger reaction and to interact with their

Rosanne Kermoian & P. Herbert Leiderman, *Infant Attachment to Mother and Child Caretaker in an East African Community*, 9 INT'L J. BEHAVIORAL DEV. 455 (1986).

42. *See* Kermoian & Leiderman, *supra* note 41 (examining attachments to mothers and to child caregivers); Marcus, *supra* note 11, at 367 (1992) (examining attachments to foster mothers and foster fathers); Jeffrey Scott Applegate, *Beyond the Dyad: Including the Father in Separation-Individuation*, 4 CHILD & ADOLESCENT SOC. WORK 92 (1987).

43. Applegate, *supra* note 42, at 96-97; Adria E. Schwartz, *Thoughts on the Constructions of Maternal Representations*, 10 PSYCHOANALYTIC PSYCHOL. 331, 341-2 (1993).

44. *See, e.g.*, Kermoian & Leiderman, *supra* note 41 (finding East African children securely attached to both mothers and other caregivers at rates comparable to mother attachment rates in U.S. studies).

45. *Id.* at 468. *See also* Louis W.C. Tavecchio & Marinus H. van IJzendoorn, *Perceived Security and Extension of the Child's Rearing Context: A Parent-Report Approach*, *in* ATTACHMENT IN SOCIAL NETWORKS, *supra* note 13, at 35, 42 (reporting studies establishing that "children may have similar attachment relationships with several different adults, i.e., father, mother, and professional caregivers.").

46. For a discussion of the possibilities and problems of using the Ainsworth measures in the evaluation of older children, see M. Ann Easterbrooks, Cherilyn E. Davidson & Rachel Chazan, *Psychosocial Risk, Attachment, and Behavior Problems Among School-Aged Children*, 5 DEV. & PSYCHOPATHOLOGY 389 (1993). The body of research documenting child behavior before and after everyday separations and correlating reaction patterns with behavioral and adjustment patterns does not, of course, address the longer term effects of separation. It does not tell us whether everyday separations are developmental impediments or developmental triggers. It simply describes separations, draws conclusions concerning the quality of attachment, and examines correlations between attachment quality and aspects of psychosocial functioning.

47. Applegate, *supra* note 42, at 95.

three to six month infants similarly to the mother.[48] Mother and father interactions with five to ten month old children have been found to be comparable,[49] and fathers who are non-primary caregivers have been thought to play a special role in the development of children between fifteen and twenty-four months.[50] Although mothers in the United States have been found to spend more time with children, to take more responsibility for their care, and to interact with them more,[51] mothers and fathers have been found equally competent at the time of their child's birth to care for the child,[52] and children whose fathers serve as highly involved second caregivers have been found to be "characterized by increased cognitive competence, increased empathy, . . .and a more internal locus of control."[53] A large and apparently well designed study of father custody found "no differences. . .between custodial fathers and mothers on. . .measures of nurturance and involvement."[54]

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48. *Id.*

49. *Id.* at 96-97.

50. *Id.* at 98-99.

51. Michael E. Lamb, *The Emergent American Father, in* THE FATHER'S ROLE: CROSS-CULTURAL PERSPECTIVES 3, 9 (Michael E. Lamb ed., 1987) [hereinafter THE FATHER'S ROLE].

52. *Id.* at 11.

53. *Id.* at 15-16. Research in the United States has suggested that fathers interact differently with children than mothers in that they are more playful and less nurturant. *See* THE FATHER'S ROLE, *supra* note 51, at 10. Research in a different cultural setting has found otherwise. *See* Barry S. Hewlett, *Intimate Fathers: Patterns of Paternal Holding Among Aka Pygmies, in* THE FATHER'S ROLE: CROSS-CULTURAL PERSPECTIVES 295 (Michael E. Lamb ed., 1987) (reporting findings that among the Aka, men engage regularly in nurturing behavior and that vigorous play is not characteristic of interactions between children and male caregivers.). This research is consistent with much earlier findings of father-infant interactions in other cultures that were substantially more intimate and nurturing than father-infant interactions in Europe and in the United States. *See* BRONISLAW MALINOWSKI, SEX AND REPRESSION IN SAVAGE SOCIETY, 23-24 (1927) (reporting the intimate, active, and nurturing behavior of Trobriand fathers).

54. Richard Warshak, *Father-Custody and Child Development: A Review and Analysis of Psychological Research*, 4 BEHAVIORAL SCI. & THE L. 181, 194 (1986)[hereinafter Warshak, *Father-Custody and Child Development*] (citing John W. Santrock & Richard A. Warshak, *Father-Custody and Social Development in Boys and Girls*, 35 J. SOC. ISSUES 112 (1979); John W. Santrock, Richard A. Warshak & G. L. Elliot, *Social Development and Parent-Child Interaction in Father-Custody and Step-Mother Families, in* NONTRADITIONAL FAMILIES: PARENTING AND CHILD DEVELOPMENT 289 (Michael E. Lamb ed., 1982); Richard A. Warshak, *The Effects of Father-Custody and Mother-Custody on Children's Personality Development, microformed on* DISSERTATIONS ABSTRACTS INT'L, No. 7918709 (Univ. Microfilms, 1979); Richard A. Warshak & John W, Santrock, *Children of Divorce: Impact of Custody Disposition on Social Development, in* LIFE-SPAN DEVELOPMENTAL PSYCHOLOGY: NONNORMATIVE LIFE EVENTS 241 (Edward J. Callahan & Kathleen A. McCluskey eds., 1983); Richard A. Warshak & John W. Santrock, *The Impact of Divorce in Father-Custody and Mother-Custody Homes: The Child's Perspective, in* CHILDREN AND DIVORCE 29, 38 (Lawrence A. Kurdek ed., 1983) (collectively referred to as the Texas Custody Research Project)).

3. *Studies of Children of Divorced Parents*

Research concerning the adjustment of children after the divorce of their parents is complex and often ambiguous, for it is impossible to account for all the variables that might affect well-being. Nonetheless, the results of this research are consistent with the conclusion that bonds to both parents can be strong and developmentally significant. Whether in father-custody or mother-custody, children experience distress at the time of family dissolution,[55] and children of divorced parents seem almost invariably to hold reunification fantasies.[56] There is substantial, although not uncontradicted, evidence that children of divorced parents fare better if they are able to maintain positive contact with both parents.[57] Moreover, children in joint custody arrangements report greater satisfaction and seem to fare at least as well as children in sole custody arrangements. A four-year longitudinal study of 1,124 divorcing families with children between the ages of six and fourteen found that child satisfaction was greatest in dual residence custodial arrangements.[58] Children in mother-, father-, and dual-custody "were quite similar in their self-reported levels of adjustment, and judging from the absolute level of their ratings, most appeared to be functioning well within the normal range."[59]

4. *Cross-Cultural Comparisons*

Studies of different cultures and subcultures have also undermined belief in the primacy of the single psychological bond, for they have shown that children's reactions to everyday separations vary according to whether

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55. Warshak, *Father-Custody and Child Development, supra* note 54, at 191; JUDITH S. WALLERSTEIN & JOAN BERLIN KELLY, SURVIVING THE BREAKUP: HOW CHILDREN AND PARENTS COPE WITH DIVORCE 35 (1980); P. Lindsay Chase-Lansdle & Mavis Hetherington, *The Impact of Divorce on Life-Span Development: Short and Long Term Effects, in* 10 LIFE SPAN DEVELOPMENT AND BEHAVIOR 105 (David L. Featherman & Richard M. Lerner eds., 1990).

56. Warshak, *Father-Custody and Child Development, supra* note 54, at 192 (reporting a study in which "virtually all the children attributed reconciliation wishes to the child in their projective story").

57. For evidence that positive relationships with non-custodial parents are related to well-being, see E. Mavis Hetherington, *Family Relations Six Years after Divorce, in* REMARRIAGE AND STEP-PARENTING, CURRENT RESEARCH AND THEORY 185 (Kay Pasley & Marilyn Ihinger-Tallman eds., 1989). For evidence that there is no correlation, see Frank F. Furstenberg, Jr., S. Philip Morgan & Paul D. Allison, *Paternal Participation and Children's Well-Being After Marital Dissolution*, 52 AM. SOC. REV. 695 (1987).

58. Eleanor E. Maccoby, Christy M. Buchanan, Robert H. Mnookin & Sanford M. Dornbusch, *Postdivorce Roles of Mothers and Fathers in the Lives of Their Children*, 7 J. FAM. PSYCHOL. 24, 25-27, 34 (1993).

59. *Id.* at 34. *See also* Robert D. Felner & Lisa Terre, *Child Custody Dispositions and Children's Adaptation Following Divorce, in* PSYCHOLOGY AND CHILD CUSTODY DETERMINATIONS: KNOWLEDGE, ROLES, AND EXPERTISE 106, 128 (Lois A. Weithorn ed., 1987) ("In general. . .[studies examining the differences in adjustment as a function of being in joint or sole custody] report no clear differences among family types as they relate to children's adjustment.").

they have been acculturated to expect multiple caregivers. A study of Kip-sigis children in western Kenya found that although infants "as in other communities, are often upset when their mothers leave them for short peri-ods, this response does not last long. They become accustomed to care by several people, and so maternal absence by itself does not occasion distress."[60]

Studies across five cultures have shown that "after the universal emer-gence of distress at separation from mother, at about 1 year of age, [coin-ciding with the emergence of 'a cognitive ability to detect and evaluate (and therefore sometimes to fear) unusual and unpredictable events' [61]] there is considerable diversity among cultures in its decline in the second and third years of life."[62] American and Botswanan children who were cared for almost exclusively by their mothers continued to show distress upon everyday separations beyond the thirtieth month; for children, like the Kipsigis children, from communities "where siblings or other persons play an important role in the day-to-day care of infants and toddlers, there is a more rapid decline in the amount of distress."[63] Similar differences have been observed between children who have, and children who do not have, non-working parents. Jessica Benjamin has reported from her re-search that:

> when one-year-old babies were left alone with the stranger in the Ainsworth experiment. . ., the babies of working mothers who had had regular sitters related to and 'used' the stranger to remain calm. Of the babies in exclusive-mother care, most showed stranger anxiety and became upset when left by mother with the stranger. All babies were upset when left completely alone, as expected.[64]

Shirley Brice Heath's descriptions of two communities in the Ameri-can South convey a "feel" for cultural differences that might aggravate or mitigate the child's reactions as she becomes able to appreciate that the familiar caregiver is absent. In the first of these communities, a white, working class neighborhood in the southern United States, access to the child is rather carefully controlled:

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60. Charles M. Super & Sara Harkness, *The Development of Affect in Infancy and Early Childhood, in* CULTURAL PERSPECTIVES ON CHILD DEVELOPMENT 1, 15 (Daniel A. Wagner & Harold W. Stevenson eds., 1982).

61. *Id.* at 7.

62. *Id.*

63. *Id.* at 9 (table 1-4), 15. Similarly, stranger anxiety is more pronounced in cultures in which children are exposed to few strangers. Thus, American children who see many strangers but have a single caretaker were found to be less anxious about strangers, but more anxious about separations, than were Kipsigis children who had multiple caretakers but saw few strangers. *Id.* at 15-16.

64. BONDS OF LOVE, *supra* note 12, at 209.

> Neighbors, church people, and relatives come to visit the new
> mother and baby. . . .Female relatives of the new mother are in
> charge of visitors, and they usher visitors in to see the sleeping
> baby and allow some close relatives to hold the baby for a feeding
> or while the bottle is being prepared.[65]

Heath reports that in this community "[y]oung mothers home alone, with
their first child in particular, often have many hours with no one around to
talk to. They talk to their babies."[66] In the second community, a nearby
black, working class neighborhood, children are "almost never alone and
very rarely in the company of only one other person."[67] A crying baby is
"fed, tended, held, and fondled by anyone nearby."[68] Each child seems to
be the concern of each adult. "There is great joking about those who hold
a new baby awkwardly, and men and women demonstrate willingly how to
hold a baby as though 'he's a part of you;'"[69] crawling babies and curious
toddlers "are constantly under the watchful eye of someone in the
community."[70]

5. *A New Consensus*

Rejection of the monotropic view of infant and child bonding has been
widespread, affecting the views of research scientists, clinicians, and child
welfare practitioners, alike. As Jessica Benjamin has noted, "the literature
on attachment has long since disconfirmed. . .[Bowlby's] original theory
that attachment devolves on only one person in favor of the idea of multi-
ple attachment figures."[71]

Some researchers have concluded not only that multiple bonds are
characteristic of most children, but also that they are beneficial. Scholars
engaged in a comprehensive, international research program on attach-
ment and bonding have, as a result of their own findings and their exten-
sive reviews of the findings of others, shifted from what they call the
monotropy of earlier bonding theories to an "extension hypothesis." They
have come to believe that:

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65. SHIRLEY BRICE HEATH, WAYS WITH WORDS: LANGUAGE, LIFE, AND WORK IN
COMMUNITIES AND CLASSROOMS 116-17 (1983).

66. *Id.* at 121.

67. *Id.* at 74.

68. *Id.*

69. *Id.* at 75.

70. *Id.* at 76.

71. BONDS OF LOVE, *supra* note 12, at 210. As Benjamin also notes, Bowlby himself
came to acknowledge, to some extent, the importance of a child's bonds to multiple caretak-
ers. *See* BOWLBY, ATTACHMENT, *supra* note 13, at 304 ("During their second year of life a
great majority of infants are directing their attachment behavior towards more than one
discriminated figure, and often towards several. Some infants select more than one attach-
ment-figure almost as soon as they begin to show discrimination; but probably most come to
do so rather later.").

the optimal caregiving arrangement would consist of a network of stable and secure attachment relationships between the child and both its parents and other persons such as professional caregivers, members of the family, or friends. In research, attachment should be considered in light of a network of relationships the child builds up in the first years of life.[72]

As these researchers point out in an analysis of the deficiencies of Bowlby's monotropy thesis:

> permanent actual presence of the (primary) caregiver is virtually impossible in a family in which there is (often) more than one child to be cared for, and in which the caregiver has to fulfill other responsibilities than bringing up children. In most families, help provided by baby-sitters, neighbors, relatives, friends, acquaintances and especially the partner is indispensable. Given the inevitability of temporary separations, the optimal rearing context will, from the child's perspective, be made up by more or less stable relationships with several different caregivers who all act as attachment figures. For if only one specific caregiver has developed into an attachment figure, each separation will appear to be a very severe event, since the child has no one else to turn to. On the other hand, in an extended rearing context, a separation from an attachment figure does not automatically imply a separation as perceived by the child: there are a number of caregivers who may provide the same source of security in potentially threatening situations.[73]

The implications of rejection of the monotropic view have been brought to bear upon clinical and legal practice. James Bray writes:

> In contrast to popular ideas and viewpoints within the legal system, research indicates that children develop multiple attachments to caregivers who can help them cope with separation anxiety and stress. The idea of "one psychological parent" or "the primary parent" is a concept often emphasized by custody evaluators and within legal circles. This notion is controversial and has very little empirical support. There is usually a hierarchy of attachment figures, each of whom may have qualitatively different. . .relationships with the child, although children may prefer

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72. IJzendoorn & Tavecchio, ATTACHMENT IN SOCIAL NETWORKS, *supra* note 13, at 1, 24-25.

73. Louis W.C. Tavecchio & Marinus H. van IJzendoorn, *Perceived Security and Extension of the Child's Rearing Context: A Parent-Report Approach, in* ATTACHMENT IN SOCIAL NETWORKS, *supra* note 13, at 39-40. *See also* Warshak, *Father-Custody and Child Development, supra* note 54, at 198 (reporting findings that for children of divorced parents "contact with additional caretakers was positively related to the child's behavior toward the custodial parent.").

one attachment figure over another. Thus, the relationships be-
tween parents, other caregivers and children. . .are of importance
in determining children's. . .reactions to custodial arrangements
and visitations.[74]

A careful review of research concerning post-divorce visitation and custody
arrangements concluded, "the contention. . .that the child's relationship
with the custodial or 'psychological parent' may be damaged by the contin-
ued coequal involvement of the noncustodial parent does not appear to be
necessarily true."[75]

6. Implications for Psychological Parent Theory

We must be very careful in drawing out the implications for psycholog-
ical parent theory of rejecting the monotropic view. Psychological parent
theorists accept the possibility of multiple bonds. They are monotropists in
two rather limited senses. First, the work of psychological parent theorists
does not acknowledge cultural and subcultural differences (and arguably
underestimates age differences[76]) in the reaction of children to separations.
As a result, psychological parent theorists fail to acknowledge the variabil-
ity of reactions to everyday separations and to longer term separations not
associated with permanent loss or other trauma. Thus, in contrast to
Bowlby's acknowledgement that separation distress is significantly miti-
gated by the presence of a familiar companion other than the absent
caregiver or by nurturing care from an unfamiliar caregiver,[77] and in con-
trast to the findings of cross-cultural studies that separation effects vary
according to the experiences and expectations of the child, psychological
parent theorists see intense distress or lasting harm even in everyday sepa-
rations from the mother (in the case of younger children) or from the nu-
clear parents (in the case of older children). Second, although
psychological parent theorists acknowledge, if only in the case of older chil-
dren, that children may be importantly bonded at least to both of two par-
ents,[78] they minimize the importance to the child of all but the most intense
current bond. Believing that children can only maintain bonds to adults
who are positively related to one another, they counsel that older bonds be
severed in service of the autonomy of the primary caregiver. As a result of
these two stances, psychological parent theorists propose policies that leave
children in the consistent (if not constant) care of adults with exclusive
authority to limit their interactions with others.

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74. James H. Bray, *Psychosocial Factors Affecting Custodial and Visitation Arrange-
ments*, 9 BEHAVIORAL SCI. & THE L. 419, 423 (1991).

75. Felner & Terre, *supra* note 59, at 140.

76. Attachment theory is largely undeveloped with respect to children above the age of
two. *See* Easterbrooks, Davidson & Chazan, *supra* note 46, at 399 (discussing the difficulties
of assessing attachment behaviors of 5-7 year olds).

77. BOWLBY, SEPARATION, *supra* note 15, at 16.

78. *See supra* notes 46-54 and accompanying text.

Child welfare practitioners and policy makers influenced by the milieu or family network perspective on attachment and bonding take a different approach. Like Goldstein, Freud and Solnit, they recognize that family disruptions are traumatic, often combining the pain of separation from familiar caregivers with the exacerbating impact of official intervention and an uprooting from familiar surroundings.[79] But they aspire, not to provide a single, substitute bond, but rather to provide an expanded milieu and opportunities to conquer feelings of betrayal and loss. Despite somewhat mixed research findings, researchers addressing post-divorce custody issues have expressed a conviction, grounded in theories of child development, "that when parents are able to cooperate in childrearing after a divorce and when [non-custodial parents] are able to maintain an active and supportive role, children will be better off in the long run."[80] In contrast to the "out of sight, out of mind" theory that seems to underlie the recommendations of psychological parent theorists, clinicians responsive to multiple bonds have worked to develop ways for children in care to "mourn" or otherwise come to terms in explicit ways with feelings about their families of origin.[81] For example, practitioners working in the foster care system have developed devices like the "Fami-O-Graph" or "Lifebook" to help young children in placement to record and come to terms with all of their biological and fictive kinship ties.[82] Open adoptions have been recommended for children who can not return to their families of origin.[83] For older children in residential placement, a policy of "family integrity" has been recommended.[84] This policy stems from the recognition that placement can interfere with

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79. *See* Martha Morrison Dore & Eleanor Eisner, *Child-Related Dimensions of Placement Stability in Treatment Foster Care*, 10 CHILD & ADOLESCENT SOC. WORK J. 301, 303 (1993) ("[A]ny child who enters out-of-home placement, whether traditional or treatment foster care, is experiencing significant trauma by virtue of the loss of familiar surroundings and relationships, no matter how detrimental these may seem to an outside observer. This trauma is compounded by further changes in placement, as when a child is moved from one foster home to another or from a temporary shelter to a foster home."); Grant Charles & Jane Matheson, *Children in Foster Care: Issues of Separation and Attachment*, 2 COMMUNITY ALTERNATIVES 37, 39-40 (1990) ("The experiences of repeated separations and abandonments, as is often the case with a child in care, will elicit ever-increasing anger and related dysfunctional responses."). For comparable findings with respect to family disruption by divorce or spousal separation, see *supra* notes 55-59 and accompanying text.

80. FRANK F. FURSTENBERG, JR. & ANDREW J. CHERLIN, DIVIDED FAMILIES: WHAT HAPPENS TO CHILDREN WHEN PARENTS PART 73 (1991).

81. For a review of these clinical strategies, see Rita S. Eagle, *"Airplanes Crash, Spaceships Stay in Orbit": The Separation Experience of a Child "In Care"*, 2 J. PSYCHOTHERAPY PRAC. & RES. 318, 319-20 (1993).

82. Linda L. Katz, *An Overview of Current Clinical Issues in Separation and Placement*, 4 CHILD & ADOLESCENT SOC. WORK J. 209, 219 (1987).

83. *See* Lawrence W. Cook, *Open Adoption: Can Visitation with Natural Family Members Be in the Child's Best Interest?*, 30 J. FAM. L. 471, 472 (1991-92); Carol Amadio & Stuart L. Deutsch, *Open Adoption: Allowing Adopted Children to "Stay in Touch" with Blood Relatives* 22 J. FAM. L. 59, 62 (1983-84).

84. Philip E. Perry, Grant P. Charles & Jane E. Matheson, *Separation and Attachment: A Shift in Perspective*, 2 J. CHILD CARE 9, 23 (1986).

developmentally significant processes of family interaction, thus "disempower[ing] the family as a unit" and disrupting healthy development.[85] Under the family integrity system, the child's substitute caregivers encourage interaction with the family of origin:

> Family or significant care-givers would not be given an opportunity to. . .withdraw on any permanent basis. The task of residential placement would be to ensure that the family, no matter what, is unrelentingly confronted with their responsibility and their value to the young person's well-being. Families would be given continuous recognition of what they can now contribute to their young person.[86]

Constructive interaction among original caregivers, substitute caregivers, and children would presumably meet with the approval of psychological parent theorists, so long as it was voluntarily engaged in by the primary custodial caregiver.[87] Their claim is not that interaction with former caregivers is inherently bad for children, but rather that children cannot profit, but will suffer, from interactions with adults about whom the psychological parent is negative or hostile and with whom the psychological parent does not want the child to interact. This claim is not unreasonable. It finds apparent support in the consistent findings of research concerning the adjustment of children of divorce that animosity between parents correlates with behavioral problems and poor adjustment.[88] The difficulty, of course, is that these findings do not tell us whether children are harmed by the fact that important figures in their lives are in conflict or by an inability to interact with those figures when they are in conflict. If one takes the older view that the primary bond is of overwhelming importance, then one is drawn to minimize the child's desire or need to maintain other ties and to shelter the psychological parent-child dyad. If one takes the family network perspective, believing that children profit from multiple bonds and suffer the repression or denial of separation distress, then one is drawn to minimize the value of an autonomous dyad and keep the child's world open to preexisting attachment figures.

B.   *The Good Mother*

Theoretical work concerning the nature of the "mother bond" is like the more recent work concerning patterns of multiple attachments in that it

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85. *Id.* at 9.

86. *Id.* at 23.

87. Beyond the Best Interests, *supra* note 1, at 116-121.

88. *See* Daniel S. Shaw & Robert E. Emery, *Parental Conflict and Other Correlates of the Adjustment of School-Age Children Whose Parents Have Separated*, 15 J. Abnormal Child Psychol. 269 (1987) (finding parental conflict correlated with behavior problems and with low perceived cognitive competence); Felner & Terre, *supra* note 59, at 115 (reporting that continuing family conflict is correlated with negative outcomes for children of divorce).

suggests, although it does not compel, modifications of psychological parent theory. Attachment theory was originally grounded in studies of the trauma surrounding mother-infant separations.[89] It is carried in our minds, I believe, with an image of a baby crying for its mother. It grew naturally from the observation, made by Bowlby in a 1951 report concerning neglected children in post-war Europe, that "maternal love" is as important to mental development as nutrients are to physical development.[90] Despite important differences between the views of Anna Freud and John Bowlby,[91] psychological parent theory shares this lineage.[92] The first image of the psychological parent is the mother whose familiar patterns of feeding, handling, and comforting the child cannot, without cost, be interrupted, even by the use of a baby-sitter.[93] The parental function, as described by psychological parent theorists, changes little over time. Although the developmental needs of the child change, the parent continues to act as an omnipresent base of security and comfort.[94] As I will explain below, more recent theoretical work concerning child development and the "mothering" function provides new models of parenting. These models are built upon two insights. The first is recognition that the requirement of omnipresence is infeasible, a product of denial generated by the fantasy of the perfect mother. The second is recognition that infants and children need (and want), not only a measure of comfort and security, but also the challenge of interacting with other minds — minds that prove their "otherness" in that they do *not* act invariably in fulfillment of the child's wishes.

1. Being a Perfect Mother

Just as attachment theorists have recognized the impossibility — and questioned the desirability — of "permanent actual presence of the primary caregiver,"[95] women striving to include the perspective of the parent in child development research have questioned the mothering ideal implicit in many theories of attachment. Nancy Chodorow and Susan Contratto have identified a culturally dominant image of the mother as all powerful, always idealized, and, as a result, always blamed when things are not well.[96]

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89. *See supra* notes 13-35 and accompanying text.

90. IJzendoorn & Tavecchio, ATTACHMENT IN SOCIAL NETWORKS, *supra* note 13, at 7 (citing JOHN BOWLBY, MATERNAL CARE AND MENTAL HEALTH (1951)).

91. *See* BOWLBY, SEPARATION, *supra* note 15, at 388-90 (describing Anna Freud's adherence to her father's view that attachment behaviors were secondary to physical drives rather than primary, as Bowlby argued).

92. The influence upon psychological parent theorists of attachment theorists, including Bowlby, is acknowledged in BEFORE THE BEST INTERESTS, *supra* note 3, at 201-02.

93. BEYOND THE BEST INTERESTS, *supra* note 1, at 32.

94. *See id.* at 32-34 and *supra* notes 71-75 and accompanying text.

95. *See supra* note 73 and accompanying text.

96. Nancy Chodorow & Susan Contratto, *The Fantasy of the Perfect Mother*, in RETHINKING THE FAMILY: SOME FEMINIST QUESTIONS 191, 203 (Barrie Thorne ed., 1992).

They quote Adrienne Rich's description of the need the mother is imagined to fulfill as "a need vaster than any single human being could satisfy, except by loving continuously, unconditionally, from dawn to dark, and often in the middle of the night."[97] They help us to see that the job of parenting implicit in the psychological parent theorist's ideal is a job only imaginable for woman, and, upon reflection, not imaginable at all.[98] Sara Ruddick, focusing on the intellectually demanding work of mothering, describes the stories of real mothers:

> The "dream of plentitude" — a mutually embracing, mutually desiring mother-child couple — often disappears in mothers' tales of babies who can't be made happy, jealous older siblings, altered sexual and love relationships, financial worries, and the general emotional confusion and sleeplessness that tend to mark the early weeks of mothering. To be sure, many mothers also remember moments of passionate infatuation with an astonishingly marvelous infant. But these mothers, if they are at all effective in their work, are unlikely to remember themselves as absorbed lovers in a baby couple. As Madeleine Sprengnether has remarked, "the concept of *mother*-infant symbiosis is an obvious absurdity, for a mother can only act as a mother if she perceives herself as such, as separate and different from her infant. A mother who felt in every way like an infant would be worse than useless as a caretaker."[99]

The fantasy of the perfect and all powerful mother is held so dearly that women who make these statements (and we who report them) must seem churlish spoilers. Yet, a great deal can be learned from those who speak with an experienced and loving mother's realism about the possibility, and wisdom, of living up to the fantasy. Jessica Benjamin, mother, psychoanalyst and scholar, looks beyond the "omnicompetent angel of the house"[100] who is our mother fantasy to imagine a parent who excites a child's capacity for interaction with an independent mind.

2. Being Both Mother and Other

Child development theorists are helping us to see that intellectual and psycho-social growth occurs as a baby learns, beginning as early as four

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97. *Id.* at 204.

98. For a discussion of the ways in which the myth of the good mother supports social control of women, see Lisa C. Ikemoto, *The Code of Perfect Pregnancy*, 53 OHIO ST. L. J. 1205 (1992). For an examination of the subordinating effects the myth has upon women of color, see Dorothy E. Roberts, *Racism & Patriarchy in the Meaning of Motherhood*, 1 AM. U. J. GENDER & L. 1 (1993).

99. Sara Ruddick, *Thinking Mothers/Conceiving Birth*, in REPRESENTATIONS OF MOTHERHOOD, *supra* note 27, at 32-33 (quoting MADELEINE SPRENGNETHER, THE SPECTRAL MOTHER 233 (1990)).

100. BONDS OF LOVE, *supra* note 12, at 211.

months, to recognize, and then to relate to, other minds.[101] Language, interpersonal competence, and personality all follow the baby's profound recognition that she interacts with someone who has independent thoughts, moods, and intentions. Benjamin works from Bowlby's recognition of the social character of early attachment behaviors, and, relying upon the subsequent insights of Margaret Mahler, Daniel Stern, and D.W. Winnicott, proposes a theory of intersubjectivity.[102] In Benjamin's view, the infant has an ability to recognize, to enjoy, and to grow in reaction to the experience of the mothers subjectivity. The expectation that mother will be omnipotent and subject to the child's will leaves the child in a dominating isolation, with an illusion of "mastery," but no sense of otherness. Moreover, it leaves the child unable to address in a constructive way the anger and fear aroused when the mother-figure — imagined to be all powerful — disappoints.

From Benjamin's theory of intersubjectivity there flows an understanding of a role for caregivers beyond the provision of physical care and comfort. A caregiver "stimulates an incipient recognition of otherness, difference, discrepancy, and this pleases the infant, who likes the excitement that a brush with otherness brings."[103] The excitement of recognition of another mind is not only pleasurable, but necessary to the child's development:

> If the mother is unable both to set a clear boundary for the child and to recognize the child's intentions and will, to insist on her own separateness and respect that of the child, the child does not really 'get' that mother is also a person, a subject in her own right. Instead, the child continues to see her as all-powerful, either omnipotently controlling or engulfingly weak. . .[and] the process of mutual recognition has not been furthered.[104]

It is in the play of intersubjectivity that a child learns to manage separations, and to manage them without resorting to displacement of negative feelings into fantasized scenarios of the omnipotent but evil caregiver or the omnipotent self who annihilates the other's will:

> The child who can imaginatively entertain his own and his [caregiver's] part — leaving and being left — has attained a space that symbolically contains negative feelings so that they need not be projected onto the object (she is dreadful) or turned back upon the self (I am destructive). The mother has. . .helped the child to

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101. *See* Jessica Benjamin, *The Omnipotent Mother, in* REPRESENTATIONS OF MOTHERHOOD, *supra* note 26, at 133 [hereinafter *The Omnipotent Mother*]; Jerome S. Bruner, ACTUAL MINDS, POSSIBLE WORLDS 59-62, 73-77 (1986).

102. *See* BONDS OF LOVE, *supra* note 12, at 11-50.

103. *The Omnipotent Mother, supra* note 101, at 133.

104. *Id.* at 135.

contain and share these feelings, has provided a space in which they can be understood as fantasy.[105]

In this vision, the work of parenting — of caring for children and helping them to grow — includes the work of meeting children's physical needs and providing basic comfort. But it is not the work of protecting the illusion of the omnipotent mother who satisfies all wants. It is the work of helping children — gently, lovingly, playfully — to grow in health and to learn to relate in health to other independent minds.

3.   Implications for Psychological Parent Theory

I have described a process of rethinking the nurturing role to take account of the impossibility of uninterrupted symbiosis, and of the child's need for intersubjective exchange. This rethinking has two implications for psychological parent theory: It removes some of the stigma of separation, and it suggests that separation is an issue that children should be encouraged to confront rather than deny. Each of these implications needs to be drawn with a very careful line of argument.

If the denial of an earnest wish to be omnicompetent makes a mother seem churlish, any suggestion that the harms of childhood separation have been overstated by psychological parent theorists seems cruelly perverse. Let me first cabin the statements. When I speak of mitigation of the stigma of separation, I do not mean to suggest that it is all right to impose upon children the obvious harms of long term and other traumatic separations from familiar caregivers. It does seem, however, that everyday separations can be understood as constructive learning experiences rather than as inflictions of inevitable damage. As attachment theorists have pointed out,[106] and as cross-cultural analyses demonstrate,[107] everyday separations can be mitigated by a supportive milieu in which caregiving is shared among several adults with whom the child is familiar. As Benjamin's work suggests, they can provide opportunities for healthy — and even pleasurable — brushes with the concept of an independent other.

It is in pursuit of Benjamin's suggestion that I say children should be encouraged to confront rather than deny separation. If we accept the possibility of a constructive approach to everyday separations, we are led to rethink the stance we take with respect to all separations. The inevitable separations of daily life are aggravated by our tendency to pretend that they are avoidable. We imagine that "mother" need never go away, and so we fail to provide the support of alternate caregivers or to apply our minds to encouragement of the child's capacity to adapt. In thinking through the needs of foster children, perhaps we have been captured again by the image of the perfect mother. All of us have imagined everyday separations as

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105. *Id.* at 138.
106. *See supra* note 41 and accompanying text.
107. *See supra* notes 60-70 and accompanying text.

small crimes and wanted to pretend that mother could avoid them by always being there for her child. Perhaps we have also wanted to pretend that we could erase the conflicted feelings associated with the greater "crime" of family disruption by calling forth a new mother, by giving the child permanence and a new symbiosis. Of course, this is a fantasy. Enduring symbiosis is a womb state; wherever a child goes, she will meet the challenge of separations. Moreover, many, many foster children retain deep feelings for the families they have lost.[108] The fantasy of a new symbiosis is no cure for the conflict associated with those feelings.

CONCLUSION

The variables in a child's life are many, and measures of well-being are imprecise. Numbers will not tell us which interventions will help and which will hurt. Case studies are also inconclusive. They invite us to generalize from fact patterns that may be rare or idiosyncratic. Nonetheless, case studies are a useful way of filling in explanatory stories suggested by empirical and theoretical work. To this end, Rita Eagle has published a moving account of the course of therapy with a boy who spent most of his childhood in care.[109] Eagle chronicles this child's abiding attachment, manifested in alternating expressions of acceptance and rejection, to his family of origin; his similar, but increasingly fragile, attachments to foster parents and to institutional caregivers; his moments of relative comfort when he is made to feel secure and permitted to speak openly about his lost families, and his anguish as institutional caregivers disappear and foster families change. This child was preoccupied with a toy spaceship given to him by his mother, and he repeatedly drew pictures of spaceships. When Eagle suggested on one occasion that he draw an airplane, the child said, "Airplanes are no good — they run out of fuel and crash. Only spaceships are good, because they don't fail. They just stay in orbit."[110] Eagle believes that the child was telling her that "like airplanes, real mothers and real foster mothers run out of 'fuel' (love and caring) and 'crash' (fail to provide for, protect, and stay with him). Like spaceships, however, the 'good mother' of his reunion fantasies would stay aloft and remain forever with him."[111]

As the child moved from one foster setting to another, he was never able to talk about and work through his feelings about the homes he had left. Never able to come to terms with those who had failed him, he remained captured by the image of a good mother who would never fail. Struggling to find ways to address this child's needs, Eagle suggests that the

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108. *See supra* note 11.
109. Eagle, *supra* note 81, at 321-331.
110. *Id.* at 323.
111. *Id.*

agencies and policies that shaped his life harmed him by clinging them-
selves — and by implicitly encouraging the child to cling — to the fantasy
of a "good mother" who would never "fail." Consistent with what she de-
scribes as "strong evidence," Eagle argues that "past ties are tenacious, that
they may have persisting effects in children's lives, and that respect for
these ties by new caretakers may help, rather than hinder, the development
of new relationships."[112] She, therefore, gives cautious support to recogni-
tion of multiple caregivers and a policy of access between children and fam-
ilies of origin.

If, as recent research and theory would have us believe, children profit
more from the care of several than of one caregiver, are bonded to old
caregivers, and need to put aside fantasies of omnicompetent mothers in
favor of loving engagement with imperfect others, then *adults must tran-
scend differences of class, race, history, and parenting capacity to provide for
each foster child as cooperative a network of care as the child's decidedly
disadvantageous circumstances will allow.* Creative uses of custodial or-
ders, co-guardianship arrangements, open and consensual adoptions, kin-
ship and community based foster care, and liberal visitation policies will
prove constructive tools in forging those cooperative networks. Termina-
tion of parental rights will sometimes be constructive, but will more often
be irrelevant or detrimental.

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112. *Id.* at 331.