ADOPTION OF MINOR CHILDREN BY LESBIAN AND GAY ADULTS: A SOCIAL SCIENCE PERSPECTIVE

CHARLOTTE J. PATTERSON

Does adoption of minor children by openly lesbian or gay adults serve the best interests of children? Although forbidden in some jurisdictions, such adoptions have taken place in other parts of the country. Considerable public controversy continues to surround adoptions by lesbian and gay parents. In this article, I begin with a description of two actual adoptions which illustrate the difference between stranger adoptions, in which the biological parent's rights are terminated, and second parent or co-parent adoptions, in which a second person becomes a legal parent without terminating the legal or biological parent's rights. In this way, I hope to point out some of the needs that these adoptions satisfy. I then provide a brief outline of the legal status of lesbian and gay adoption in different jurisdictions and give an overview of evidence from social science research about the development of children with lesbian and gay parents. I conclude that there is no factual basis for claims that the adoption of children by lesbian and gay parents is harmful to children. On the contrary, there is every reason to believe, based on research findings, that children of lesbian and gay parents develop as successfully as do children of heterosexual parents. For this reason, and in view of the needs of children who are involved, I argue that for purposes of adoption proceedings, sexual orientation of prospective parents should be considered irrelevant.

I. ADOPTION BY LESBIAN AND GAY PARENTS: TWO PERSONAL STORIES

A. To Be Someone's Child Forever: In re Adoption of Charles B.

Representative in many ways of children in need of adoptive homes, Charles B., born in 1981, entered the Ohio child welfare system in 1985 with

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* Associate Professor of Psychology, University of Virginia.

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many problems. When his biological parents relinquished custody of him to the state at the age of four, there was evidence of both abuse and neglect. In addition, Charles suffered from leukemia. The chemotherapy and radiation treatments he received may have resulted in some side effects, and Charles suffered from attention and behavior problems. When assessed, his IQ was found to be low, and he was found to have a speech disorder as well as deficits in fine and gross motor skills. In 1985, Charles was sent to what would prove to be the first of a series of foster homes.

Charles first met Mr. B. in the summer of 1986, when the Licking County Department of Human Services assigned Mr. B. to Charles as a counselor. Their professional relationship developed gradually, and with full knowledge of the agency, into a warm and personal relationship. With permission of the agency, Mr. B. took Charles to his home, where Mr. B. lived in an openly gay relationship with Mr. K., for weekend visits and over holidays. Over time, Mr. B. became the most consistent and caring adult presence in Charles’ life.

On January 15, 1988, Mr. B. filed a petition to adopt Charles. A hearing was scheduled for April of that year. The day before the hearing, the Licking County Department of Human Services submitted papers withholding consent to the adoption. The hearing proceeded as scheduled, and a number of witnesses, including psychologists and other professionals as well as Mr. K., Mr. B.’s mother, and Mr. B.’s sister, were heard in support of Mr. B.’s petition. Dr. Victoria Blubaugh, a licensed psychologist who gave expert testimony at the hearing, said, “my concern isn’t so much that Mr. B. gets Charlie, but that Charlie gets Mr. B.”

The guardian ad litem appointed by the court to represent Charlie also supported the adoption, testifying that “the child will substantially benefit from such an adoption.” In due course, the trial court approved the adoption.

The Department of Human Services appealed, arguing that the weight of the evidence was against adoption by an openly gay man. Agreeing with this argument, the court of appeals decided that “as a matter of law, it is not in the best interest of a seven (7) year old male child to be placed for adoption into the home of a pair of adult male homosexual lovers. The goals of announced homosexuality are hostile to the goals of the adoption statute.” Not all of the judges, however, were convinced. The dissent noted that “homosexuality per se does not defeat the goals of adoption anymore than physical defects in heterosexuals. . . . Charles, with all his problems, especially deserves a chance to be someone’s child forever. The petitioner, Mr. B., offers that chance.” The majority, however, reversed the judgment.

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4. Id. at 888-89.
6. Id. at *8 (quoting from guardian ad litem’s report).
7. Id. at *6.
8. Id. at *10-11.
of the trial court, finding that as a matter of law, lesbians and gay men are not eligible in Ohio to serve as adoptive parents.\(^9\)

Both Mr. B. and the guardian ad litem appealed, and the case went to the Ohio Supreme Court.\(^10\) On March 28, 1990, with one judge dissenting, the supreme court reversed the judgment of the appeals court, and reinstated the judgment of the trial court.\(^11\) After more than two years, the adoption was legalized. Instead of returning to a foster home, Charles became Mr. B.'s child forever.

Although this stranger adoption involved an arduous and time-consuming procedure, Mr. B., an openly gay man, was able to adopt Charles. For lesbian and gay adults who have the resources to cope with legal and social service systems and who are fortunate enough to live in one of the states that make adoptions by openly lesbian or gay adults possible, stranger adoption can provide one route to parenthood. Certainly, children waiting for adoption into loving homes might be expected to benefit, as Charles must be presumed to have benefitted, from adoption by lesbian or gay parents.

Other lesbian and gay adults want to become legal parents of children with whom they already live and for whom they already serve as psychological parents. To have pre-existing relationships recognized legally, such individuals sometimes seek to obtain second parent adoptions. As illustrated in the next section, the needs served by second parent adoptions are different in a number of respects from those served by stranger adoptions.

B. The Reality of Children's Lives: *In re Adoptions of B.L.V.B. & E.L.V.B.*\(^12\)

When Deborah Lashman filed her petition to adopt two boys, B.L.V.B. and E.L.V.B., she had already acted as a parent to both of them for their entire lives. Ms. Lashman and her partner, Jane Van Buren, had lived together in Burlington, Vermont, in a committed lesbian relationship since 1986. Together, they had decided to have children and to raise them as a family. Through artificial insemination from the same anonymous sperm donor, Ms. Van Buren gave birth to B.L.V.B in 1988 and to E.L.V.B. in 1992. Ms. Lashman was present at both births and has acted as a parent to the boys ever since.

According to the law, however, only Ms. Van Buren was considered a parent. Thus, if Ms. Van Buren died, from a legal point of view, the boys would be orphaned. Alternatively, if the two women separated, the boys' relationship with Ms. Lashman would not be protected by law, nor would the law recognize any obligation on her part to provide for them. To protect against these outcomes, Ms. Lashman and Ms. Van Buren agreed to seek legal recognition for Ms. Lashman's relationship with their sons.

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9. Id. at *1.
11. Id. at 886.
They filed a petition for a second parent adoption, asking the probate court to allow Ms. Lashman to adopt the children, while leaving Ms. Van Buren’s parental rights intact. In step-parent adoptions, if all of the parties consent to the adoption, the court will generally follow the parties’ recommendation without a home study or further evaluation. In *In re Adoptions of B.L.V.B. & E.L.V.B.*, all parties agreed that the adoptions would be in the best interests of the children and the petition was uncontested, but a home study was nevertheless ordered and psychologists completed evaluations of the parties.

Despite the apparent unanimity of all parties, the probate court denied the adoptions, holding that Ms. Lashman “does not satisfy the statutory prerequisite to adoption,” because she is not married to the biological parent, Ms. Van Buren. The Vermont adoption statute specifies that “when the adoption is made by a *spouse* of a natural parent, obligations of obedience to, and rights of inheritance by and through the natural parent who has intermarried with the adopting parent shall not be affected.” This law fails to recognize couples who cannot legally marry.

Ms. Lashman and Ms. Van Buren appealed to the Vermont Supreme Court, arguing that the adoption was in the best interests of both children. On June 18, 1993, the supreme court unanimously reversed the decision of the lower court, stating:

> [O]ur paramount concern should be with the effect of our laws on the reality of children’s lives. . . . Deborah [Lashman] has acted as a parent of B.L.V.B. and E.L.V.B. from the moment they were born. To deny legal protection of their relationship, as a matter of law, is inconsistent with the children’s best interests and therefore with the public policy of this state.”

Through this decision, Deborah Lashman became the legal as well as the psychological parent of the two boys.

The Vermont Supreme Court was the first state supreme court to recognize lesbian co-parent adoptions. Thus, although the Lashman/Van Buren family had to endure delays, expenses, and considerable publicity before this adoption was granted, other lesbian and gay families seeking second parent adoptions in Vermont, and potentially other jurisdictions, are now likely to find them easier to accomplish.

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II. LEGAL STATUS OF ADOPTION BY LESBIAN AND GAY PARENTS

As these two examples suggest, legal adoptions of minor children by lesbian or gay adults fall into one of two major categories. Stranger adoptions, exemplified by the Charles B. case, occur most often when biological parents are unable or unwilling to care for a child, and an adoptive parent offers to provide that child with a home. In such cases, the courts dissolve existing legal bonds and create a new legal relationship between the child and the adoptive parent. Second parent adoptions are pursued by lesbian or gay couples who raise a child together, although only one member of the couple, the biological or legal adoptive parent, is the legal parent. These couples desire legal recognition of the relationship between the other parent and the child. In recent years, adoptions of both types have occurred among openly lesbian and gay families in the United States.18

The laws governing adoption by openly lesbian and gay adults vary enormously from state to state. At the time of this writing, adoption of minor children by lesbian and gay adults is specifically barred by law in only two states, Florida and New Hampshire.19 In other states, such as New York and Massachusetts, the law is more favorable for prospective adoptive parents who identify themselves as lesbian or gay.20 For example, in a landmark New York second parent adoption case, In re Adoption of Evan, the court noted that “[t]he fact that the petitioners here maintain an open lesbian relationship is not a reason to deny adoption . . . a parent’s sexual orientation or sexual practices are presumptively irrelevant in resolving custody disputes.”21

Even though state adoption laws vary, both stranger adoptions and second parent adoptions by openly lesbian or gay adults have occurred in numerous jurisdictions. Openly gay or lesbian adults have completed stranger adoptions in the District of Columbia, Ohio, and California.22 Many more stranger adoptions have undoubtedly been accomplished by lesbian and gay parents in other states without their sexual orientations becoming a topic of public discussion. In addition, second parent adoptions have been granted in Alaska the District of Columbia, Massachusetts, New Jersey, New

20. See Adoption of Tammy, 619 N.E.2d 315 (Mass. 1993) (holding Massachusetts adoption statute does not preclude same sex cohabitants from jointly adopting a child); In re Adoption of Evan, 583 N.Y.S.2d 997 (Sur. Ct. 1992) (holding lesbian relationship is not reason to deny adoption).
York, Pennsylvania, and Vermont. Three state supreme courts have ruled on the legality of second parent adoptions and two have affirmed them.

III. SOCIAL SCIENCE RESEARCH ON CHILDREN OF LESBIAN AND GAY PARENTS

Despite the occurrence of adoptions by lesbian and gay parents and despite discussion and publicity of issues surrounding these adoptions, the social science literature contains no published studies examining the development of children adopted by openly lesbian or gay adults. Since there is no research specifically addressing development of children adopted by lesbian or gay parents, it is clear that social science provides no warrant for the idea that parental sexual orientation should be an issue in adoption proceedings.

Even though there are no studies that directly evaluate the development of children adopted by openly lesbian or gay parents, research on the development of children born to lesbian and gay parents is relevant. Much of this research has been conducted to address expectations sometimes articulated by judges about the likely course of development among children living in the custody of lesbian and gay biological parents. There is a history of judicial
cial hostility towards lesbian and gay families with children, and negative stereotypes are evident in many court rulings.

Exemplifying the hostile treatment often accorded to lesbian and gay parents in the courts, the Virginia Circuit Court of Henrico County recently denied custody of a two-year-old boy, Tyler, to his biological mother, Sharon Bottoms, and declared her an unfit parent because she identifies herself as a lesbian. In reaching its decision, the court cited Roe v. Roe which found a gay man to be unfit as a custodial parent of his biological daughter because of his sexual orientation. The court deciding Roe stated that "the conditions under which this child must live daily are not only unlawful but they also impose an intolerable burden" upon the child because of "social condemnation . . . which will inevitably afflict her relationship with her peers and with the community at large." No evidence was cited in favor of this view; the court assumed a negative impact of lesbian and gay parents upon children. In Bottoms, the court similarly assumed that it would be harmful for Tyler to be in the care and custody of his mother and her partner.

Child welfare professionals agree that separation of children from their parents is a serious matter that should be contemplated only when there are solid reasons to believe that harm will come to a child if left in the parent's custody. If a mother is unfit, then it should be possible to document serious disruptions both in her parenting and in the development of her children. Is this the case, either of lesbian mothers and their children in general, or of Sharon Bottoms and her son Tyler in particular?

There are now a number of studies of these issues, most of them quite recent, and they have been reviewed in detail elsewhere. Not only have


30. Id. at 694.


32. HARRY D. KRAUSE, FAMILY LAW 1238 (3d ed. 1990).

33. See Robert L. Barret & Bryan E. Robinson, Gay Dads, in REDEFINING FAMILIES: IMPLICATIONS FOR CHILDREN'S DEVELOPMENT 157, 168 (Adelle E. Gottfried & Allen W. Gottfried eds., 1994) (explaining that there is generally no difference in development between children of gay parents and children of heterosexual parents); Falk, supra note 27, at 946-47 (explaining that discrimination by courts against lesbian mothers in child custody cases persists despite the abundance of research evidence which refutes the underlying assumptions); David Kleber et al., The Impact of Parental Homosexuality in Child Custody Cases: A Review of the Literature, 14 BULL. AM. ACAD. PSYCHIATRY L. 81, 86 (1986) (concluding from extant research that custody decisions tend to reflect unsupported stereotypical beliefs about homosexual parents); Charlotte
the studies failed to produce conclusive evidence that children of lesbian mothers or gay fathers have significant difficulties in development relative to children of heterosexual parents, but they have produced no evidence at all in support of this proposition. In fact, in study after study, children of lesbian mothers have been found to develop normally. In response to the major issues raised by judges in custody disputes and adoption proceedings, this research can be summarized under three major headings: sexual identity, personal development, and social relationships.

Courts have expressed concern about sexual identity among children living in the custody of their lesbian or gay parents. Would girls in lesbian or gay homes grow up thinking of themselves as boys? Would boys grow up acting effeminate, or girls grow up behaving in masculine ways? Might children of lesbian or gay parents themselves grow up to be lesbian or gay?

Reviewing the social science research on these questions, I found twelve studies, testing over three hundred children, addressing these concerns.

J. Patterson, Children of Lesbian and Gay Parents, 63 CHILD DEV. 1025, 1036 (1992) (concluding that there is no research evidence supporting the claim that children of lesbian or gay parents develop differently than children of heterosexual parents); Charlotte J. Patterson, Lesbian and Gay Families With Children, THE LIVES OF LESBIANS, GAY MEN, AND BISEXUALS: DEVELOPMENTAL, CLINICAL, AND CULTURAL ISSUES (Ritch C. Savin-Williams & Kenneth M. Cohen eds., forthcoming 1995) (manuscript at 14-16, on file with Duke Journal of Gender Law & Policy); Fiona L. Tasker & Susan Golombok, Children Raised by Lesbian Mothers: The Empirical Evidence, 21 FAM. L. 184, 186 (1991) (concluding that typical arguments against awarding custody to lesbian mothers are unsubstantiated by research).

34. See Patterson, Children of Lesbian and Gay Parents, supra note 33, at 1036; Barret & Robinson, supra note 33, at 168; Falk, supra note 27, at 946; Kleber et al., supra note 33, at 86; Tasker & Golombok, supra note 33, at 187.

35. See Falk, supra note 27, at 946; Tasker & Golombok, supra note 33, at 187.

36. See Patterson, Children of Lesbian and Gay Parents, supra note 33, at 1025.

37. See Jacobson v. Jacobson, 314 N.W.2d 78, 81 (N.D. 1981) (explaining that the court was concerned about "whether or not the fact the custodial parent is homosexual or bisexual will result in an increased likelihood that the children will become homosexual or bisexual").

Most compare children of divorced lesbian mothers or divorced gay fathers to children of divorced heterosexual parents; others compare the offspring of lesbian or gay parents to national norms for children of different ages. Not one study provides any evidence for concern.

A second concern that courts have expressed about children in lesbian and gay families involves other difficulties in personal development, such as low self-esteem, problems of adjustment, and psychiatric disorders. Reviewing research on these questions, I found a number of studies, not one of which provides any reason to believe that children of lesbian or gay parents are at risk. Courts have also expressed the view that these children are more likely to be sexually abused by parents or by parents' friends. However, the existing research suggests that the great majority of child sexual abuse is committed by heterosexual men, not by lesbians or gay men. Again, no evidence validates the courts' concerns.

The third general concern that courts have expressed about children of lesbian and gay parents focuses on children's social relationships. Some judges suggest that children of lesbian and gay parents will be teased or stigmatized by their peers because of their parent's sexual orientation. In addition, some courts wonder whether children of lesbian mothers will have sufficient contact with their fathers or other adult men who might serve as role models. I found a number of studies that were directly relevant to

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39. See Patterson, Children of Lesbian and Gay Parents, supra note 33, at 1025 (citing all of these studies). Comparisons between lesbian and gay parents are drawn in Golombok et al., supra note 38; Gottman, supra note 38; Green et al., supra note 38; Huggins, supra note 38; Kirkpatrick et al., supra note 38; Rees, supra note 38. Comparisons are made to national norms in Bozett, Gay Fathers: A Review of the Literature, supra note 38; Bozett, Children of Gay Fathers, supra note 38; Bozett, Heterogenous Couples in Heterosexual Marriages: Gay Men and Straight Women, supra note 38; Bozett, Gay Fathers: How and Why They Disclose Their Homosexuality to Their Children, supra note 38; Green, supra note 38; Miller, supra note 38; Paul, supra note 38.

40. See, e.g., In re Adoption of Caitlin & Emily, 1994 WL 149728 at *6 (N.Y. Fam. Ct. Monroe County Jan. 6, 1994) (considering whether being raised by lesbian or gay parents causes "psychiatric disturbances, [or] behavioral and emotional problems").

41. See generally Patterson, Children of Lesbian and Gay Parents, supra note 33.

42. See, e.g., J.L.P.(H) v. D.J.P., 643 S.W.2d 865, 869 (Mo. Ct. App. 1982) ("Every trial judge ... knows that the molestation of minor boys by adult males is not as uncommon as the psychological experts' testimony indicated.").

43. Patterson, Children of Lesbian and Gay Parents, supra note 33, at 1034.

44. See, e.g., Thigpen v. Carpenter, 730 S.W.2d 510, 514 (Ark. Ct. App. 1987) ("[H]omosexuality is generally socially unacceptable, and the children could be exposed to ridicule and teasing.").

45. See, e.g., Lundin v. Lundin, 563 So. 2d 1273, 1275 (La. Ct. App. 1990) (quoting trial testimony that, "It's preferable that [children] ... have good roll [sic] models in a stable environment always. I would be concerned if the role models were confused so that a child
these questions. Again, there is no evidence in support of these judicial concerns. In one study, children of divorced lesbian mothers actually had more contact with their fathers than did children of divorced heterosexual mothers. In another study, there was no difference.

Despite the lack of research evidence that any harm comes to children’s relationships with their peers, anecdotal reports illustrate some issues children of lesbian mothers confront in their relationships with other children. Some of these young people find that they are easily accepted by their peers. In her Lesbian and Gay Parenting Handbook, April Martin describes the experience of telephoning the parents of her daughter Emily’s school friend. As the child who answered the phone passed the receiver to her mother, she explained, “It’s Emily’s mom. Well, it’s one of them—she’s got two.” When peers approach differences with so little concern, children from lesbian families are unlikely to experience difficulties. Another child, asked by a teacher, “Who is that [other man who lives at your house]?” replied simply, “That’s my father’s husband.” What seems complicated to adults can sometimes be simple for children.

Some children, however, do wonder if they may encounter problems in their peer group. For example, in an article he wrote when he was twelve years old, Carl Cade, the son of two lesbian mothers, expressed concern about his peers’ opinions:

[E]verybody keeps asking me things. When they see my moms, they say, “I thought that other one was your mother.” . . . I shrug the questions off. I told one kid that one was my aunt and that I just call her my mom. My mom is not very happy about me saying that. But it’s hard sometimes. I don’t know what the kids would do if they knew.

Issues surrounding prejudice, discrimination, and the management on difference are very real for young people growing up in lesbian and gay families, and they should not be overlooked. At the same time, it is important to remember that children in many families need to cope with differences—whether they are due to race, culture, ethnicity, or socioeconomic class—and that these may not be the overriding concerns for children that we sometimes imagine.

Overall, the picture emerging from social science research on children with lesbian and gay parents is very positive. Based on the research literature, there is no reason to believe that children of lesbian or gay parents are

would not understand or know that this was not typical or usual or to be expected.

46. See generally Patterson, Children of Lesbian and Gay Parents, supra note 33.
47. Golombok, supra note 38, at 557.
48. Kirkpatrick et al., supra note 38, at 546.
50. Id. at 326.
52. Carl Cade, Two Moms, No Hamburgers!, in Different Mothers: Sons and Daughters of Lesbians Talk About Their Lives 50, 51 (Louise Rafkin ed., 1990).
53. Carl Cade himself put the issues in perspective in his article when he said that “[t]he hardest part of my life right now is that both of my moms are vegetarians.” Id. at 53.
behind their peers in any aspect of personal or social development. In other words, the biases against lesbian and gay families are unsubstantiated, based solely on prejudice.

As an expert witness in the Bottoms case, I summarized the evidence on children of lesbian and gay parents for the court.\(^{54}\) Other witnesses testified that the little boy, Tyler, seemed to be developing normally. No claims were made that his development had been impaired. Sharon Bottoms and her partner April Wade were described as a harmonious couple, devoted to Tyler's welfare.\(^{55}\) How, then, could the court find lesbian mothers in general, or Sharon Bottoms in particular, to be unfit parents? Such a decision is completely without support in the social science research, as well as in the facts of this particular case. By taking Tyler from his mother's home without compelling cause, it was, I believe, the court which imposed upon Sharon Bottoms and upon her son an intolerable burden.

Sharon Bottoms appealed the trial court's decision to the Virginia Court of Appeals.\(^{56}\) As part of the appeal process, the American Psychological Association, the National Association of Social Workers, and other professional mental health groups submitted an amicus curiae brief. Representing the views of more than 250,000 mental health professionals across the country, the brief concluded, "The presumption that a parent in an openly gay or lesbian relationship is an unfit custodian has no basis in fact."\(^{57}\) The court of appeals agreed and cited the results of social science research as showing that "a person's sexual orientation does not strongly correlate with that person's fitness as a parent."\(^{58}\) Reversing the lower court ruling, the court of appeals ordered "the circuit court [to] enter an order effectuating the resumption of custody by the mother of her son."\(^{59}\) At the time of this writing, the matter is before the Virginia Supreme Court.\(^{60}\)

In the meantime, decisions favorable to lesbian and gay families have been reached in other states. Only three days after the original circuit court decision in Bottoms, the Massachusetts Supreme Court affirmed the right of lesbian mothers to adopt children; however, shortly thereafter, the Wisconsin Supreme Court denied a second parent adoption to a lesbian couple.\(^{61}\) Cus-
Today laws pertaining to lesbian and gay families are very much in flux across the country. The patchwork of varied decisions should not, however, prevent one from seeing the historic movement toward recognition, in the courts as well as in society at large, of the rights of lesbian and gay families with children.

IV. CURRENT SOCIAL SCIENCE RESEARCH

Now that a first generation of research in this area has begun to provide answers to the questions that anti-lesbian and anti-gay prejudices propose, it may also be possible to entertain some other kinds of questions. Many important research questions arise from pride in lesbian and gay families. Questions of this kind are beginning to spawn a new generation of research on lesbian and gay families with children.

Most of the existing research has focused on children who were born in the context of heterosexual marriages. The marriages typically ended when one or both parents came out as lesbian or gay, so most studies have focused on children with divorced lesbian or gay parents. An important early exception was the study by Ailsa Steckel, who was the first to conduct systematic research on the development of children born to lesbian mothers.

For the most part, her findings reveal that children of lesbian and of heterosexual couples are more similar than different. In addition, however, she also found that children with lesbian parents are more likely to feel loveable and to be protective with younger children, and less likely to be bossy and domineering, than are the offspring of heterosexual parents. By suggesting that special benefits may accrue to children growing up in lesbian homes, Steckel's work marked the beginning of a new approach to research on lesbian and gay families with children.

In recent years, I have been working on a study of thirty-seven families with preschool and elementary school aged children who had been born to or adopted early in life by lesbian mothers. I have studied children's so-

63. Charlotte J. Patterson, Children of the Lesbian Baby Boom: Behavioral Adjustment, Self-Concepts, and Sex-Role Identity, in CONTEMPORARY PERSPECTIVES ON LESBIAN AND GAY PSYCHOLOGY: THEORY, RESEARCH, AND APPLICATION 156, 158 (Beverly Greene & Gregory M. Herek eds., 1994) (describing a study of four-to-nine-year-old children born to or adopted early in life by lesbian mothers); Patterson, Children of Lesbian and Gay Parents, supra note 33, at 1026 (reviewing research evidence on the personal and social development of children with lesbian or gay parents); Charlotte J. Patterson, Lesbian and Gay Families, 3 CURRENT DEV. IN PSYCHOL. SCI. 62, 63 (1994) (describing research on gay and lesbian families).
65. Steckel, Psychosocial Development of Children of Lesbian Mothers, supra note 64, at 87.
cial competence, conduct, sex-role development, and self-concepts. Like earlier researchers, one of my main findings has been that children of lesbian mothers are developing in much the same ways that any other normal group of children might be expected to develop.

The only significant differences I found between children of lesbian and children of heterosexual parents were in the area of self-concept. How did the children see themselves, feel about themselves? While many areas of self-concept showed no differences, I did find differences in two areas. Children of lesbian parents reported experiencing more symptoms of stress, but also a greater sense of well-being than did a comparable group of children with heterosexual parents. By symptoms of stress, I mean that children of lesbian mothers were more likely to report feeling angry, scared, or upset. By sense of well-being, I mean that children of lesbian mothers were more likely to report feeling joyful, content, and comfortable with themselves.

It is not entirely clear what, if anything, to make of these findings. For instance, it is not yet possible to know whether they will hold true for families in other parts of the country. A first step in interpreting these results, then, will be to find out whether or not they are true also of other children who are growing up with lesbian or gay parents.

If the results do replicate, many interpretations are possible. One possibility is that children with lesbian mothers encounter more stress, and having learned how to deal with it, feel happier about themselves than other children. If children of lesbian mothers do experience greater stress than other children, my results suggest that they are coping with it very well, and that, like any of us who completes a difficult task, they feel good about themselves. Another possible interpretation is that children growing up in lesbian mother households are simply more accustomed than other children to talking about their feelings, both positive and negative. Because they are more comfortable with such discussions, they may be more open to describing their feelings, whether positive or negative. Until researchers complete further studies, it will not be possible to decide which, if either, of these interpretations is correct.

I hope that future research and theory will focus on the strengths as well as on the stresses of lesbian families. Young people raised by lesbian or gay parents sometimes say that this experience helped them appreciate the issues faced by members of other minority groups. Thus, one byproduct of growing up in a lesbian mother home may be an increased appreciation for human diversity. Children of lesbian mothers and gay fathers may be more able to celebrate human diversity and more comfortable with differences.

67. See Patterson, Children of Lesbian and Gay Parents, supra note 33, at 1032.
68. Patterson, Children of the Lesbian Baby Boom: Behavioral Adjustment, Self-Concepts, and Sex-Role Identity, supra note 63, at 173.
69. Id. at 168.
70. Id. at 169-70.
71. Jon Dylan, Live and Let Live, in Different Mothers: Sons and Daughters of Lesbians Talk About Their Lives, supra note 52, at 83, 85.
Another result of growing up in a lesbian mother or gay father home may be an expanded view of gender roles—of which behaviors are properly male and which properly female. Because lesbian and gay parents must somehow accomplish both the traditionally male and the traditionally female aspects of parenting, children in these homes are likely to grow up with flexible gender role models. As a result, young people may feel comfortable acting in ways that are right for them, creating for themselves a wider range of behavioral choices than those recognized by other children.

In addition, children born to lesbian or gay parents, or adopted by them, also share a certainty of having been wanted. As one son of lesbian mothers explained, "If you are a lesbian, you have to go through a lot of trouble to get a child, so that child is really wanted." The certainty of having been wanted may convey many advantages to children of lesbian and gay parents.

Yet another possible benefit for children of lesbian mothers may be the opportunity to grow up observing a model of justice, especially in terms of the division of labor at home. The division of labor in heterosexual families generally involves wives doing much more unpaid childcare and household work than husbands. In lesbian and gay families, however, one person is rarely responsible for the great majority of childcare and household labor.

To examine this issue in my own research, I asked each of the lesbian couples who had children to describe their division of labor. These couples reported splitting tasks far more evenly than do most heterosexual couples. Although the biological mother generally did more childcare, and the nonbiological mother spent somewhat more time in paid employment, these differences were not nearly as large as those evident in heterosexual families. The major finding was that lesbian families who took part in my study divided household labor and childcare more evenly than do heterosexual families. Taken together, these findings sug-

72. Laurie Marie Sebastian, Possibility, in DIFFERENT MOTHERS: SONS AND DAUGHTERS OF LESBIANS TALK ABOUT THEIR LIVES, supra note 52, at 171, 172.
73. Cade, supra note 52, at 53.
77. See Hand, supra note 75 (finding that lesbian parenting couples reported sharing the
gest that children growing up in lesbian and gay homes are likely to witness a remarkable model of fairness in the allocation of family labor.

What consequences might this have for children? Among the families participating in my research, I found that there were interesting associations between parents' division of labor and children's development. For instance, lesbian mothers were more satisfied and their children also felt better about themselves when couples divided childcare responsibilities more equally. If replicated in other research, this finding about children's development in lesbian and gay households would certainly seem to have very positive implications.

V. CONCLUSION

Overall, the findings of social science research to date have been remarkably clear. Not only have studies of lesbian and gay families failed to unearth significant handicaps suffered by children in these families, but research is also beginning to explore some of the possible benefits of growing up with lesbian or gay parents. Although research specifically focused on lesbian or gay adoptive families has yet to be reported, there is certainly no evidence in the social science literature to suggest that children adopted by lesbian or gay parents might encounter special developmental difficulties attributable to parental sexual orientation. On the contrary, existing research findings suggest that home environments provided by lesbian and gay parents are as likely as those provided by heterosexual parents to support and enable psychosocial growth among family members. Unless and until the weight of evidence can be shown to have shifted, I conclude that, in decisions regarding the adoption of minor children, parental sexual orientation should be considered irrelevant.

78. Patterson, Families of the Lesbian Baby Boom: Parents' Division of Labor and Children's Adjustment, supra note 76.