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Parent Child Contact Problems: A Coat of Many Colors

Robert A. Simon, Ph.D.¹

Forensic Psychology Consulting

Contact: rsimon@dr-simon.com

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Abstract

For the family law professional who focuses on matters of contested custody of children, one of the most complex and difficult issues is that of children who resist-refuse contact with a parent. It appears that parent child contact problems (PCCP) are occurring with increased frequency. Therefore, it should not be surprising that controversy amongst professionals about how to conceptualize these problems is also increasing along with controversy about how to intervene and when to intervene. Such problems appear to occur with increased frequency. The highly complex and convoluted family dynamics that present in cases where resist-refuse is evident challenge family law professionals, be they mental health professionals, attorneys, or judicial officers. Adding to the matter is the phenomenon of the professionals mirroring the highly conflicted dynamics of the family in their professional relationships. The dynamics fuel opposing confirmational biases, conceptual debates and readily trigger a destructive tug-of-war between what is often the aligned parent's allegations of abuse and the rejected parent's allegations of alienation. Multiplying the complexity, the nature of the conflict spawned by PCCP dynamics tends to iatrogenically reinforce both the child's resist refuse and the parent's divergent and opposing perceptions of one another. Often, what results is an ever increasing spiral of conflict in which things get worse no matter what the parents and professionals attempt to do to support and assist the family. Binary arguments about the genesis of PCCP (for example, it is either abuse or it is alienation) are misleading, contrary to the science, and harmful to children. Rather than cast variables as mutually exclusive alternatives, the professional who takes a family systems approach to conceptualizing the phenomena must consider more multiple mutually compatible

possibilities, realities and relationship dynamics which can converge to cause a child to prefer one parent and resist or refuse contact with the other.

Forces and dynamics that can result in children resisting and refusing contact with a parent after the breakup of the family is not new nor have they escaped the attention of family law professionals over the years. However, when simple and sweeping assumptions and rules were applied to the custody of children after their parents separated such as when children were seen as the property of fathers (Wyer et al., 1987) or more recently, when the law determined that children belonged in the care of their mothers' uniquely tender care, also known as the "tender years doctrine) (DiFonzo, 2014), the dynamics underling parent child contact problems did not concern family law professionals because of the sweeping rules that were in place regarding where children would live and how they would be cared for. The emergence of the Best Interests of the Child standard approximately seven decades ago meant that each child's specific interests were to be determined and that child custody determinations would depend on what was thought to be in the best interests of any given child. Although the Best Interests standard can result in decisions that optimize the individualized well-being of children, every coin has two sides. The individualized determinations facilitated by the Best Interests standard also results in the greater probability of conflict between the parents about what is best for their children. And, because individualized determinations are made, the dynamics and forces that can result in resist-refuse are more likely to take root and unfold. These dynamics and forces are complex and like the individualized best interest determinations, how these dynamics and forces may or may not affect a given child is complex. Although the

human brain can process many millions of bits of information per second, it is also true that when faced with highly complex situations, the human brain attempts to simplify the problem it is trying to solve. The errors in logical thinking (also known as cognitive biases) include the oversimplification bias (Simon & Stahl, 2020). Thus, based in large measure on human neuropsychology, when faced with complex and convoluted phenomenon, it is common for people to posit simple understandings and simple solutions

It is not surprising that attempts to make sense of children's resistance and refusal to post-separation contact with a parent is a phenomenon that easily evokes overly simple and, therefore, inadequate explanations for these parent-child contact problems. In the 1980s and 1990s, American psychiatrist Richard Gardner adapted the British Common Law concept of alienation of affection to explain parent-child contact problems (Gardner, 1987, 1992, 1998, 2001). Gardner promulgated the Parental Alienation Syndrome (PAS), a novel diagnosis intended to describe the child's preference for one parent, typically the mother according to Gardner, accompanied by the child's rejection of the other parent, typically the father according to Gardner. Gardner asserted that the child's rejection of its father was the result of mother's behaviors and efforts to disrupt and interfere with the child's relationship with the father. Gardner offered that mother's efforts included involving the child in her unwarranted and harsh denigration of father. Thus, the child's resistance was seen as the result of purposeful attempts on the part of the mother to turn the child against an otherwise capable and competent father. These efforts were seen as indicative of mother's psychopathology. Gardner's "Parental Alienation Syndrome" earned a good deal of notice and Gardner soon became a

popular expert witness, typically hired by fathers, whose children resisted post-separation contact with him. Although Gardner died by suicide in the 1990's, in the early 2000's, Gardner's allies advocated to include PAS or its indistinguishable first cousin, Parental Alienation Disorder (PAD), in the American Psychiatric Association's revision of the Diagnostic and Statistical Manual (DSM 5; American Psychiatric Association, 2013) (Bernet, 2010). These efforts failed for many reasons including the lack of empirical evidence validating the construct. The failure was also because the scientific community understood that it is antithetical to the scientific methods and scientific logic illogical to reason backwards from an observable outcome (that is, the child's polarized position with Parent A and rejecting Parent B) to infer causation (Parent A's allegedly alienating behaviors).² Yet, Gardner and his protégés continued and continue to advocate this cognitive mashup (Joshi reference).

The dangers inherent in so-called backwards reasoning are pervasive and dangerous. This is because they attempt to find data to prove a theory rather than conforming to empirical science in which allowing the theory to result from observed data. Consider, for example, the physician asked to explain a child's chronic illness. Clinical presentation or *phenotype* is commonly the result of multiple, interacting underlying causes including numerous possible *genotypes*.³ To infer causation from clinical presentation alone is to risks harm and can easily result in the actual cause being

² Note that advocates of the PAS and PAD position now commonly argue that alienation is captured in the DSM 5 under the non-diagnostic ("Other conditions that may be a focus of clinical attention") labels Child Affected by Parental Relationship Distress (V61.29) and/or Child Psychological Abuse (V61.21). In this way, their failure to have PAS/PAD included in the DSM 5 is not seen by them as a strong rebuke of PAS/PAD. Instead, they rationalize that it was not truly rejected but, instead, is included in a shape-shifted manner.

³ "[N]ot all phenotypic changes can be attributed to genetic changes. A difference in hair color could also be caused by non-genetic factors such as age, intensity of solar radiation or hair dyeing, or by a combination of both genetic and non-genetic differences." (Orgogozo et al., 2015, p. 2).

overlooked. In the physician's case, the risk is getting the wrong diagnosis and/or prescribing the wrong medication or intervention. In the case of PCCP, an inaccurate attribution of causation can permanently damage a child's relationship with one or both parents. It can also result in a parent being seen as toxic to the children. Because those invested in and aligned with seeing parental alienation as the most likely cause of a child resisting or refusing contact with a parent, they often advocate for interventions in which the toxic parent is removed from the life of the child, often for a prolonged period. To the extent that parental alienation advocates overlook the multidimensional and "coat of many colors" in PCCP, children can and are removed from a competent and capable parent. There can be a host of developmental, social, and emotional sequelae for children manifesting PCCP although how these will show up in any specific child depends on the exigencies, context, dynamic, experience and vulnerabilities of any specific child. The physician knows and family law must similarly understand that clinical presentation is reasoned to generate multiple hypotheses needing further investigation. Jumping to conclusions, failing to consider the complexity of PCCP and choosing simple conceptualizations and solutions for complex problems must be avoided.

In the early 2000's, the concept of alienation as applied to family law diverged along two distinct paths much similar to how languages diverge when subgroups of speakers relocate to different environments (Honkola et al., 2018). Over time, the two distinct evolutionary paths yield two very different outcomes grown from the same root.

The path taken by many of those who had formerly advocated for PAS as a DSM diagnosis (and who continue to falsely assert that it is included by implication under the

heading of parent-child problems), and their adherents has changed little. Although references to “syndrome” and “disorder” are typically avoided by these adherents,⁴ these professionals describe and advocate for a facsimile of Gardner’s PAS modified and purportedly validated by Amy Baker and colleagues (e.g., Baker and Darnall, 2006, 2007). When speaking to one of the key advocates for parental alienation, William Bernet, this author learned that Bernet acknowledges avoiding the use of the term “Parental Alienation Syndrome” because it is politically incorrect within the scientific community. However, Bernet acknowledged that his view of the phenomenon is overlapping with how Parental Alienation Syndrome has been described. These zealous alienation advocates assert, “...when abuse or neglect have not occurred, it is highly probable—to 99% clinical certainty⁵— that alienation is the cause of the rejection.”⁶ This approach notably remains absent consideration of any variable besides alienation and its supposedly mutually exclusive opposite, to sometimes called “realistic estrangement”. This is not to say that alienation and realistic estrangement do not exist and are not sources of PCCP. Instead, it is the case that these are two

⁴ Joyce (2019, pp. 72-73) reports that Linda Gottlieb, a PAS/PAD advocate “... openly acknowledges that she has stopped using the word ‘syndrome’ because ‘it’s controversial.’ Omitting the word ‘softens the effect’ and avoids ‘raising hackles’ among legal professionals and judges. She instructs others to also avoid using the word due to its controversy.”

⁵The concept of clinical certainty/scientific certainty is rhetorical puffery and represents attempts to make something seem more certain, official, and empirical than it can conceptually be. In fact, on September 6, 2016, the Attorney General of the United States of America issued a memorandum in which she instructed those forensic scientists working for the DOJ cease using terms such as “reasonable scientific certainty” in their reports and work products <https://www.justice.gov/opa/file/891366/download> . This came after the National Commission on Forensic Science issued a strongly worded memorandum strongly advising against the use of such terms <https://www.ascl.org/wp-content/uploads/2016/03/Final-Draft-Views-Doc-on-The-Use-of-The-Term-Reasonable-Scientific-Certa....pdf>.

⁶ Gottlieb, L. J. (2019). Reunification Therapy for Severe Parental Alienation or for an Unreasonably Disrupted Parent-Child Relationship. Online program description access 20 February 2020, at http://endparentalalienation.weebly.com/uploads/3/1/0/9/31091731/12-22-2019_tpff_treatment_protocol_x_4_6_18_ent_protocol_for_severe_alieantion_rejection.pdf.

pathways to PCCR but by no means the only two pathways and by no means mutually exclusive pathways.

This is not to say that these former PAS advocates have ignored the science and evidence that has and continues to emerge. They have also propounded “science” that is not scientific. For example, in one study, (Baker, 2005) proposes to have empirically validated specific alienation strategies used by alienating parents. The proponents of parental alienation frequently cite this “science” as validation for the reality of alienation. What they fail to reckon with are sweeping and fatal methodological flaws in the Baker study. For example, the research was conducted on 58 adults who were purportedly alienated children while growing up. However, no objective efforts assured that these study subjects were actually alienated children. Instead, the subjects simply self-identified as having been alienated. As if the selection and screening of subjects didn’t doom this “science” to the ash heap, Baker offers that based on a very small sample size of 40, the 17 alienation strategies were demonstrated. This overlooks the fact that such a small sample size is woefully inadequate to have the statistical power to validate the strategies. In apparent deference to the emergence of contemporary multi-factorial approaches to PCCP, the binary approach was first parsed to become a four-factor model (Baker, 2018) and more recently sliced even more finely to be presented as a five-factor model (Lorandos & Bernet, 2020). By either name, it remains the same either/or alienation v. estrangement formulation.

The five-factor model declares that alienation must be in effect if these conditions are met:

1. The child refuses contact with Parent B.

2. The child once had a “positive relationship” with Parent B.
3. Parent B has not been found to be abusive or neglectful
4. Parent A is identified as having engaged in “alienating behaviors”
5. The child is manifesting behaviors associated with parental alienation.⁷

As appealing as this model may be to custody litigants’ confirmational biases and oversimplification bias⁸, zealous advocates win-lose mentality, and the adversarial court system, it is fatally flawed by its illogical and counter-intuitive insistence on inferring cause from effect (Garber, 2019a; Joyce, 2019). It defines alienation and estrangement as the only possible causes of PCCP and forces one to either ignore all other possible contributing variables or to artificially construe those other factors as features of one of these two exclusive dynamics. Consider, for example, a New York court’s experience with the binary model: “When questioned about whether a child might want to spend more time with one parent - without any alienation existing - the expert again evaded an answer, testifying ‘it’s remotely possible’ and adding “I have not seen it”⁹

A second group of family law professionals diverged early this century from those who continued to carry the PAS/PAD banner. These professionals took a wider view of the causes of PCCP, acknowledging the roles of alienation, estrangement, alignment and

⁷ The failures of this model have been illustrated elsewhere by analogy to the statement “if it has four legs and doesn’t bark, it must be a cat.” This illogical, artificially binary (if not dog then cat) statement can similarly be made to appear to be a five-factor model as follows: “It must be a cat if: 1. It is an animal; 2. It has four legs; 3. It doesn’t bark; 4. It is not a dog; and 5. It manifests behaviors associated with cats” (Garber et al., 2022b, pp. 214-242). This superficially sound syllogism fails when one recognizes that hyenas, genets, fossas, falanoucs, and civets all qualify.

⁸ “... rejected parents will often react to their children’s behavior in ways that reinforce the exaggerated or distorted negative image that the child holds of them, thereby giving credence to that negative image and strengthening the child’s tendency to avoid” Friedlander and Walters 2010 p. 104

⁹ JF v. DF (61 Misc.3d 1226(A), 112 N.Y.S.3d 438, 2018 N.Y. Slip Op. 51829(U)) FN 55

enmeshment as a “hybrid” model (Fidler et al., 2019; Friedlander and Walters, 2010; Walters and Friedlander, 2016).

How questions are asked has a great deal to do with how questions are answered and how one conceptualizes the range of possible answers to the question. Much like investigative interviewing avoids asking leading questions in favor of open ended questions, if one asks, “is this alienation?” the cognitive framework is coerced and inappropriately narrowed. Anchoring and confirmational biases (among others) prompt responses focused on alienation that can blind parents, family members, friends, parenting plan evaluators, attorneys, advocates, and courts to other possibilities. ¹⁰ Far more valid and meaningful is the open-ended question, “What factors are contributing to the child’s polarized position? and “What are the multiple possible explanations for the child’s behavior and what evidence is there for each explanation?”

Conceptualizing PCCP as a complex, highly nuanced, multiply determined phenomenon instead of a binary either/or phenomenon that is a zero-sum game allows for a broad, varied, and rich understanding of children’s ¹¹, relationship ecology. This invites lay persons and family law professionals to consider contextual variables such as each parent’s home environment and neighborhood, the role of secondary and tertiary relationships (e.g., siblings, step-parents, grandparents, peer groups), developmental variables such as normal separation anxiety and parent-child affinity, the child’s

¹⁰ “... precursors to the child’s rejecting behavior towards one parent may ... be obscured if there is a focus on or a search solely for evidence of one parent’s post-divorce alienating behavior or the other parent’s abusive Behavior” Friedlander and Walters 2010 p. 108

¹¹ “... we must remember that the best interests of the child simply must come first. The moral blameworthiness of the alienating parent’s conduct has nothing to do with the course of action that is in the child’s best interests” (Boyd, 2015, p. 2).

chameleon-like efforts to adapt to disparate environments, and those more pathological and pathogenic relationship pressures including alienation, estrangement, and enmeshment (Garber, 1996, 2019; Garber et al., 2022b; Polak and Saini, 2015). It allows us to understand PCCP in an adaptive and normative context for some children in which their alignment with one parent over the other parent reflects the child's desperate attempt to protect themselves from unremitting, toxic, and deeply damaging conflict between the parents. Imagine this visual example: high conflict parents can be likened to individuals engaged in a chronic pistol duel. Whereas we want children between their parents with an affinity for each, if the parents are constantly firing off rounds at each other, the child has no choice but to remain ever vigilant, scanning 360 degrees to see where the incoming rounds are coming from. The child required to do this finds themselves in an untenable and impossible situation. To cope with this impossible situation, some children may protect themselves by hiding behind one of the two parents so they are protected from the crossfire. Which parent is chosen depends on the many variables in the relationship ecology suggested above. If, instead, one conceptualizes the adaptive and self-protecting alignment with a parent as the result of alienation (which according to alienation adherents it must be so long as there is not abuse in the relationship ecology), the solution to the child's PCCP (the parent's unremitting conflict) will go unaddressed. Courts have responded in kind, handing down more nuanced rulings. For example: "There are multiple reasons for the strained relationship between the father and the children. I find, however, that the primary cause is connected to the father's behavior and lack of insight. The second cause is related to

the mother's behaviour. The third cause is related to the children's temperaments."¹²

More recently, the California appellate court ruled that the trial court abused its discretion in ordering children manifesting PCCP into a program in which their relationship with one parent was cut off because that parent was thought to be an alienator.

The divergent evolution of the alienation construct in family law leaves us today with two distinct and conflicting perspectives on PCCP: A small but vocal and well-funded minority who advocate for a binary approach sometimes referred to as a four- or five-factor model and a larger group that advocates for an ecological approach. At issue is not the existence of alienation as some have suggested (Lorandos, 2020). Sadly, alienation can and does happen. Instead, when PCCP is evident, it, must be understood as a relationship dynamic that can arise between people rather than as a syndrome or illness that can arise within a child (Garber et al., 2022). At issue, instead, is our ability and willingness to look beyond simple and appealing either/or, black/white arguments to wrestle with the full complexity of human relationships.¹³

Like many constructs in the social sciences, carrying out empirical studies of PCCP is difficult. This is due to the practical challenges inherent in defining and obtaining randomized samples, defining, and obtaining control groups, high attrition rates amongst subjects. Also, because when PCCP is evident in a family the matter is often litigated, parents are understandably concerned that the outcome of such research

¹² KG v. HG, 2021 Nova Scotia Supreme Court 43

¹³ "Many parents frankly find it easier to blame the other parent as the cause of the breakdown of their relationship with the children than to find fault with themselves, and the narrative of "all good" versus "all bad" is an alluring change of pace for family law lawyers accustomed to cases cast in varying shades of gray. It is sometimes difficult to resist the urge to assume the role of white knight" (Boyd, 2015a, pp. 6-7.)

could undermine their litigation position and legal arguments (Garber, 2020; Milchman et al. , 2020; Robb, 2020).

The body of published studies on PCCP more often than not takes a narrow and binary view of PCCP, essentially asking “is it alienation or not?” rather than asking “what are the variables in play?”. This is likely the result of alienation having a fifty-plus year history in family law and because alienation advocates have, to their credit, been very successful at publishing. Also, the either/or deductive question is far easier to ask, investigate and discuss. Open ended, multi-factorial, open-ended inductive questions are more difficult to ask, investigate and answer. open-Further, the multi-faceted ecological model of PCCP is relatively new. Therefore, the number of published studies is smaller.,

A review of studies of the PCCP phenomenon (Saini, Johnston & Fidler, 2016) s accurately points out that there is are substantial issues in defining terms, complex and potentially insurmountable research methodology problems, and a lack of empirically validated and reliable instruments for assessing the phenomenon. The author concludes there is a need for research that can to “... reliably distinguish alienation from other types of strained parent–child relationships, and to determine the most appropriate responses to individual cases.” The authors observed that, “[t]he field has often simplified the complexities of parental alienation with insistence that either an alienating parent or an abusive one caused children to reject a parent. The problem with absolute thinking is that the complexity of potential factors influencing outcomes, both positively and negatively, is missed” (Saini et al., 2016, p. 378).

As previously discussed, studies that seek to understand “is it alienation” are circular and deductive. They posit the effect and then collect data that appear to validate it without first considering alternative and mutually compatible variables (see Baker and Darnell, 2006, 2007; Baker and Verrocchio, 2013; Baker and Chambers, 2011; Ben-Ami and Baker, 2012 for examples of such scholarship). These studies hypothesize and then purport to confirm that if a rejected parent is neither abusive nor neglectful, then the child’s polarized alignment must be due to the aligned parent’s alienating behaviors.

PCCP is a vexing and pernicious problem. Family law practitioners seek to understand the phenomena and to find solutions. When problems as troubling as PCCP present themselves, it is common and understandable from psychological and neuropsychological perspectives to accept anything that proposes to explain the problem. Also, when powerful emotions are at play (and there can be no doubt that PCCP evokes powerful emotions), there is a strong human tendency to fall into erroneous logical thinking leading to a lack of understanding of the flawed concepts and procedural approaches. Not surprisingly, the dichotomous thinking proffered by alienation advocates (it is either alienation or abuse) is appealing. As previously discussed, when referencing Baker’s study resulting in the 17 alienating strategies, these studies largely rely upon non-random and self-selected samples -often rejected and vindictive fathers- without control groups or anchoring norms. They rely on fuzzy criteria for the phenomena of interest, resulting in a sample of subjects that lacks the commonality that truly facilitates scientific study. They typically report data collected from single sources -often parents who self-identify as having been alienated from their children- without establishing independent and impartial corroboration of those

accounts. Their findings are therefore vulnerable to both researchers' and participants' confirmational biases, misleading to those who endorse them, and risk doing harm when brought to bear on the lives of children.

There are studies that reject the easy and tempting binary conceptualization of PCCP. Instead, these studies employ an inductive approach to the asking and answering of questions. They employ broad and open ended questions, seeking to collect data bearing on the multiple relationship dynamics and practical conditions associated with PCCP outcomes. Admittedly, these studies are far fewer in numbers and for good reason: they are far more difficult to conduct, and they require more complex conceptual frameworks. Still, they have more empirical integrity and seek to conform to the scientific method more faithfully.

The subjects in such studies are typically identified by way of more objective criteria such as court records instead of self-identification, self-labeling and self-selection. The sources of PCCP measured are defined by neutrals such as judicial officers (by way of court findings/rulings) and third-party assessors. These studies employ substantially larger sample sizes, avoiding the statistical problems of the studies with small sample sizes. These are not perfect studies. That neutrals identify the source of PCCP does not assure that the identifications are accurate, but this is a far better means for identification than the self-identification, labeling and selection of the studies propounded by alienation advocates. These studies also lack control groups and can only identify correlations and co-occurrence versus certain cause. They look beyond the tempting but heuristically misleading binary presumption that PCCP is largely the result of alienation or abuse.

As early as 2005, Johnston and colleagues recognized, "... a multi-factor explanation of children's rejection of a parent with both the aligned and rejected parents contributing to the problem, together with role reversal in parent-child relationships" (p. 191). Research grown out of this hybrid model has since yielded the observation that "... uncomplicated or pure cases of alienation in which neither estrangement nor enmeshment were identified as playing a significant role, were relatively infrequent...." (Friedlander and Walters, 2010).¹⁴

This multifactorial conceptual model of PCCP is more complex, less convenient for decision makers but like most things human, complexity is the norm. The binary model exists and is advocated despite the simple reality that complexity is nearly always the case in understanding human emotions, human relationships, and human behavior. Sure, there are cases in which PCCP can accurately be placed at the doorstep of a parent due to that parent's abusive behavior or alienating behavior, in the overwhelming majority of PCCP cases, the causes are several and the "fault" is shared by both parents if not both parents, their support systems, child variables and even the unintentional iatrogenic impact of the legal system and those working within the system. Focusing on a single cause is rarely helpful" (Fidler & Bala, 2020, p. 576). Two of the world's most powerful professional organizations recently joined to advise that, "Children are at greater risk when parent-child contact problems are not effectively addressed and when family law professionals and others echo and intensify the polarization within the family. This problem may be exacerbated by ... gendered and

¹⁴ For example: "When one looks at the history of this family, one can see the role that both parents have played in the situation as it is today. This was, and remains, a high conflict situation for which both parents are to blame" J.C.W. v. J.K.R.W., 2014 BCSC 488 at item 68.

politicized assumptions that either parental alienation or intimate partner violence is the determinative issue” (15 August 2022 by the Association of Family and Conciliation Courts (AFCC) and the National Council of Juvenile and Family Court Judges)

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