

Ten Parental Alienation Fallacies That Compromise Decisions in Court and in Therapy

Richard A. Warshak

University of Texas Southwestern Medical Center at Dallas

False beliefs about the genesis of parental alienation and about appropriate remedies shape opinions and decisions that fail to meet children's needs. This article examines 10 mistaken assumptions: (a) children never unreasonably reject the parent with whom they spend the most time, (b) children never unreasonably reject mothers, (c) each parent contributes equally to a child's alienation, (d) alienation is a child's transient, short-lived response to the parents' separation, (e) rejecting a parent is a short-term healthy coping mechanism, (f) young children living with an alienating parent need no intervention, (g) alienated adolescents' stated preferences should dominate custody decisions, (h) children who appear to function well outside the family need no intervention, (i) severely alienated children are best treated with traditional therapy techniques while living primarily with their favored parent, and (j) separating children from an alienating parent is traumatic. Reliance on false beliefs compromises investigations and undermines adequate consideration of alternative explanations for the causes of a child's alienation. Most critical, fallacies about parental alienation shortchange children and parents by supporting outcomes that fail to provide effective relief to those who experience this problem.

Keywords: alienation, custody reversal, high-conflict divorce, parental alienation, reunification

Common false beliefs about parental alienation lead therapists and lawyers to give bad advice to their clients, evaluators to give inadequate recommendations to courts, and judges to reach injudicious decisions. The increasing recognition of the phenomenon of children's pathological alienation from parents brings with it a proliferation of mistaken assumptions about the problem's roots and remedies. These assumptions fail to hold up in the light of research, case law, or experience.

In some instances, a professional may not have thought to question the belief, or may lack sufficient experience and familiarity with research literature to test the accuracy of the assumption. The more often the fallacy is mentioned in professional presentations and publications, the more likely it becomes a *woozle*—a commonly accepted idea that lacks grounding in persuasive evidence yet gains traction through repetition to the point where people assume that it is true (Nielsen, 2014). In other cases evaluators, therapists, and lawyers make unreliable predictions based on the relatively small sample of their practices. Some professionals hold rigid ideological positions that inhibit receptivity to disconfirming facts or lead to intentional

evasion of data that conflict with desired conclusions (Lundgren & Prislis, 1998; Martindale, 2005). Even those with no strong ideological motivation to advocate a particular position are susceptible to confirmation biases that predispose them to search for and focus on information that supports previously held beliefs and expectations, while overlooking, ignoring, or discounting facts that fail to conform to their preconceived views (Greenberg, Gould-Saltman, & Gottlieb, 2008; Jonas, Schulz-Hardt, Frey, & Thelen, 2001; Rogerson, Gottlieb, Handelsman, Knapp, & Younggren, 2011). An untested assumption about the significance of one factor, such as a generalization based on a child's age, may lead family law professionals to place undue weight on that factor when making recommendations or decisions.

This article identifies 10 prevalent and strongly held assumptions and myths about parental alienation found in reports by therapists, custody evaluators, and child representatives (such as guardians ad litem), in case law, and in professional articles. Ideas were determined to be fallacies if they are contradicted by the weight of empirical research, by specific case outcomes, or by the author's more than three decades of experience evaluating, treating, and consulting on cases with parental alienation claims. The following discussion pertains to the pathological variant of parental alienation and not to situations in which a child's rejection of a parent is proportional to the parent's treatment of the child. The 10 fallacies about parental alienation fall into two categories: those that predominantly relate to the genesis of parental alienation and those concerned with remedies for the problem.

Fallacies About the Genesis of Parental Alienation

1. Children Never Unreasonably Reject the Parent With Whom They Spend the Most Time

It is generally assumed that children will identify most closely with the parent whom they see the most. When children live

RICHARD A. WARSHAK received his PhD in clinical psychology from the University of Texas Health Science Center. He is a Clinical Professor of Psychiatry at the UT Southwestern Medical Center and consults and testifies internationally in child custody proceedings. He studies the psychology of alienated children; children's involvement in custody disputes; and outcomes of divorce, child custody decisions, stepfamilies, relocations, and parenting plans for young children. Also he develops educational materials and interventions to help understand, prevent, and overcome damaged parent-child relationships.

CORRESPONDENCE CONCERNING THIS ARTICLE should be addressed to Richard A. Warshak, 16970 Dallas Parkway, Suite 202, Dallas, TX 75248. E-mail: doc@warshak.com

exclusively under one parent's care, naturally this increases that parent's influence on the children, including shaping their view of the absent parent (Clawar & Rivlin, 2013; Warshak, 2010a). The most extreme example of this occurs with abducted children who depend on their abducting parent for any information about their other parent. Spending more time with a parent who is the target of denigration often helps children resist becoming alienated or facilitates their recovery of a positive relationship. It is a mistake, though, to assume that children are immune to becoming alienated from the parent with whom they spend the most time. One survey found that in 16% of cases the alienated parent had either primary or joint physical custody (Bala, Hunt, McCarney, 2010). In some families the children's rejection of their custodial parent results in a de facto change of custody without litigation; thus, case law surveys probably underestimate the proportion of children who become alienated from the parent who had primary residential custody.

This author has consulted on more than 50 cases in which a father who had contact with his children primarily when school was out of session effectively influenced his children to reject their mother. In several of these cases the father retained the children at the end of an extended school holiday period at which time the children claimed that they wanted to live with him and never see their mother again. The children's motives varied. Some children wanted to please an intimidating father to avoid his anger (Drozd & Olesen, 2004). Others became convinced that their father's emotional survival depended on having his children live with him and that their mother was responsible for his suffering. In other cases a court allowed a mother to relocate with her children far away from the father, and the father retaliated by exploiting the children's discomfort about the move and manipulating them to reject their mother.

Operating under fallacy #1 some evaluators have stated unequivocally that the children's rejection of their primary residential parent (usually the mother) could not possibly constitute pathological alienation. These evaluators assume that a child who spends a lot of time with a parent is sufficiently familiar with the parent to be invulnerable to cognitive distortions about the parent. Thus if a child rejects a parent who has primary custody, the child must have a valid reason. This mistaken assumption predisposes evaluators to search for flaws in the rejected parent to explain the children's rejection while failing to investigate and sufficiently weigh the other parent's contributions to the children's negative attitudes.

Knowing that children's rejection of the parent with whom they spend the most time can be unreasonable and reflect the noncustodial parent's influence, custody evaluators, therapists, and judges should view the available data and evidence without any preconceived assumptions about the extent to which the child's rejection is justified versus unjustified. When gathering and considering data, child custody evaluators should consider alternative explanations for a child's negative attitudes regardless of which parent spends the most time with the child. Therapists should remain alert to the possibility that a child's complaints about the parent with whom the child predominantly lives may be unduly influenced by the other parent and may not reflect the child's true experiences or be an accurate account of the alienated parent's behavior.

Consulting and testifying experts who review custody evaluations that attribute children's rejection of the parent with whom

they spend the most time solely to the rejected parent's behavior should be alert to the possibility that a confirmation bias skewed the data gathering and interpretation (Martindale, 2005) and perhaps gave inadequate attention to the influence of the favored parent. Experts retained to educate the court about general issues in a case that raises parental alienation issues should be prepared to explain how this fallacy may have led to poorly reasoned opinions and recommendations reached by professionals such as evaluators, parenting coordinators, guardians ad litem, and attorneys appointed to represent the children's best interests. Judges who reject this fallacy will be more inclined to give proper weight to evidence of the noncustodial parent's influence on the children's negative attitudes toward the custodial parent when such evidence exists.

2. Children Never Unreasonably Reject Mothers

The fallacy presented above holds that a class of parents—those with primary custody—are immune from pathological alienation. Another fallacy is related to the previous one in that it also holds that a class of parents—in this case, mothers—are immune from their children's irrational rejection. A corollary fallacy is that only mothers are accused of fostering parental alienation and that this means that the concept of irrational parental alienation is bogus and simply a litigation tool for fathers (NOW Foundation, n.d.). Both fallacies are disproved by case law and empirical studies that document the existence of alienated mothers and alienating fathers in one third to one half of cases.

A Canadian survey reported that courts identified the father as the alienating parent in about one third of cases (Bala et al., 2010). Kopetski, Rand, and Rand (2006) reported that the alienating parent was the father in more than one third of cases. An analysis of unreported judgments in Australia over a 5-year period found approximately equal numbers of male and female alienators (Berns, 2001). Similarly, Gardner (2002) reported equal distributions of male and female alienators. In a small but nonrandom sample of parents who participated in an intervention to overcome children's alienation, 58% of the rejected parents were mothers (Warshak, 2010b). Also, several mothers who identify themselves as alienated have written books about their experience for the general public (Black, 1980; Cross, 2000; Egizii, 2010; Meyer & Quinn, 1999; Richardson & Broweleit, 2006; Roche & Allen, 2014).

Those who believe that mothers cannot be the victims of their children's irrational rejection are predisposed to believe that children who reject their mothers have good reasons for doing so. This belief leads evaluators to overweigh a mother's contributions to her children's rejection of her while failing to recognize the influence of the father's manipulations on the children's negativity toward their mother.

Evaluators who hold an ideological position against the concept of pathological parental alienation reflexively dismiss the possibility that a child's negative behavior toward a parent is unwarranted or is influenced by the favored parent. Such evaluators fail to adequately explore plausible rival explanations for case facts and data that relate to children's alienation and instead they prejudge the children's alienation as justified by mistreatment from the rejected parent. In so doing they fall short of practice guidelines such as the American Psychological Association's (2013)

Specialty Guidelines for Forensic Psychology. An example of the lack of critical thinking in a custody evaluation and in testimony is the failure to consider alternative explanations for a child's negative thoughts, feelings, and behavior toward the rejected parent (Warshak, 2003b).

Evaluators operating under an anchoring bias rely on accusations about the rejected parent's behavior as a point of reference for subsequent data gathering and interpretation (Martindale, 2005). This reference point leads to selective attention to evidence that confirms initial impressions, and inattention to disconfirming evidence. Confirmation bias operates when evaluators prejudge concerns about irrational parental alienation as unlikely and then seek, attend, and heavily weigh evidence of the rejected parent's contributions, while they avoid and discount evidence of the favored parent's contributions. Zervopoulos (2013) provides specific questions that attorneys can use to uncover such biases in mental health evaluations and testimony. He shows how to tie an expert witness's lack of critical thinking to the admissibility and weight accorded to mental health evidence.

Mental health and legal professionals who reject the concept of pathological parental alienation should rethink their position in the light of the extensive literature on the topic (for a comprehensive bibliography see Lorandos, Bernet, & Sauber, 2013) and a survey that reported 98% agreement "in support of the basic tenet of parental alienation: children can be manipulated by one parent to reject the other parent who does not deserve to be rejected" (Baker, Jaffe, Bernet, & Johnston, 2011). Also, the *Diagnostic and Statistical Manual Of Mental Disorders*, fifth edition includes "unwarranted feelings of estrangement" as an example of a "Parent-Child Relational Problem" (American Psychiatric Association, 2013, p. 715). Evaluators and therapists should keep an open mind about the possibility that children's rejection of their mother or their father is not warranted by the rejected parent's behavior.

3. Each Parent Contributes Equally to a Child's Alienation

Gardner's (1985) original formulation of pathological alienation, and his subsequent publications (e.g., Gardner, 1998), described multiple contributions to the child's disturbance, including the behavior of each parent, motivations that originate within the child, and situational factors such as a custody dispute or a remarriage. But his formulation, and work that followed (e.g., Clawar & Rivlin, 2013; Kelly & Johnston, 2001; Warshak, 2010a), left no doubt that the attitudes and behaviors of the parent with whom the child appears to be aligned are a key element in understanding the genesis of the problem.

Responding to allegations and concerns that clinicians and courts placed too much emphasis on the contributions of the favored parent and not enough emphasis on other factors, Kelly and Johnston (2001) recast the problem in a family systems framework. Others have elaborated this model by introducing the term *hybrid* for cases that identify a combination of both parents contributing to the children's alienation (Friedlander & Walters, 2010). Some professionals assume that a child's alienation is rarely traced to primary contributions from one parent. The influence of the family systems model is evident in custody evaluation reports that explicitly cite the model, conclude that each parent's behavior is responsible for the child's alienation, and take care to avoid

ranking either parent's contributions as more prominent. A related practice is the reflexive use of the term *high conflict couple*, a term that implies joint responsibility for generating conflict.

Kelly (2003) was one of the first to expose this fallacy. Drawing on 40 years of experience as a researcher, custody evaluator, mediator, and Special Master, she found that in as many as one third of entrenched parental disputes, one parent was clearly responsible for initiating and sustaining conflict. Clinical reports and some large-scale empirical studies describe disturbed and disturbing behavior on the part of favored parents, often characteristic of borderline and narcissistic psychopathology (Eddy, 2010; Friedman, 2004; Kopetski, 1998; Rand, 1997a, 1997b, 2011). Favored parents are more likely than rejected parents to display controlling and coercive behavior, poorly modulated rage, paranoid traits, and parenting styles that encourage enmeshed parent-child relationships, such as intrusive and infantilizing behaviors (Garber, 2011; Johnston, Walters, & Olesen, 2005; Kopetski, 1998).

Based on their study of 1000 custody disputes, Clawar and Rivlin (2013) identify the favored parent's programming as the primary dynamic behind a child's alienation, and they regard such programming as psychologically abusive. Kelly and Johnston (2001) agree that the behaviors of the favored parent "constitute emotional abuse of the child" (p. 257). Clearly their model is not intended to hold both parents in all families equally responsible for children's pathological alienation. For example, it would be no more fitting to assume that an alienated mother is equally responsible for her children's rejection of her than it would be to hold a mother equally responsible for her husband's physical abuse of the children.

Studies of formerly alienated children who reconciled with their rejected parents provide additional evidence that the behavior of the rejected parent is not a necessary factor in the genesis of children's alienation. In some cases a family crisis resulted in a spontaneous and in some cases instantaneous reconciliation (Darnall & Steinberg, 2008a, 2008b; Rand & Rand, 2006). Outcome studies for the educational intervention, *Family Bridges: A Workshop for Troubled and Alienated Parent-Child Relationships*, show that children can overcome their negative attitudes and behavior without any change in the rejected parent's personality or behavior (Warshak, 2010b; Warshak, in press). Although the workshop teaches parents how to more effectively communicate and manage conflict with their children, this is not the central element linked to improvement in the parent-child relationships. Dramatic transformations of children's negative attitudes occur during the 4-day workshop when they learn about and gain insight into the process by which they became alienated and when they have a face-saving way to recover their affection for their parents. If the rejected parent's personality characteristics and behavior were a central cause of the alienation, we would not expect the children's alienation to abate unless and until they had an opportunity to experience changes in the rejected parent's behavior.

Some children have very good reasons for feeling disillusioned with the rejected parent, but the favored parent eagerly fans the flames of negative feelings. In such cases the child's rejection has both strong rational *and* strong irrational components. The rejected parent's behavior may be sufficient to alienate the child in the short-run, but the favored parent's behavior interferes with the healing that would naturally occur

with time and support. And there is no doubt that, in some cases, the rejected parent's behavior can exacerbate or ameliorate the impact of the favored parent's influence (Warshak, 2010a). But this does not mean that the rejected parent is equally responsible for a child's alienation formed in the context of psychological abuse by the aligned parent. Laying such blame on the rejected parent is analogous to ignoring the power imbalance that may exist between spouses and holding the spouse of a physically abusive parent equally responsible for the child's injuries because she failed to protect the child. Just as the phrase "violent couple" can draw attention to transactional variables while obscuring the personality characteristics of an abusive husband (Bograd, 1984), Friedman (2004) points out that "disregarding the power inequality that often prevails in custody arrangements can obscure the fact that one parent is often fighting for more equitable access which the other parent is blocking. Calling them a high-conflict couple can be misleading and a misuse of systems theory" (p. 105).

In an effort to appear evenhanded, evaluators and judges sometimes go to great lengths to balance positive and negative statements about each parent without clarifying the behaviors that most harm the children (Kelly, 2003). It is not surprising that multiple threads form the tapestry of a child's irrational aversion to a parent; this is true for nearly every psychological disturbance in childhood. But evaluators who anchor their data gathering and analyses with the assumption that both parents contribute equally to their children's alienation overlook or undervalue information that supports alternative formulations.

Operating under this fallacy, evaluators fail to take into account the significance of the history of parent-child relationships when they weigh the contributions of rejected parents to their children's alienation. They cite aspects of the parent's personality or behavior that the children complain about, such as using the cell phone too much during the children's soccer games, without considering that this parental behavior had not previously undermined the children's love and respect for the parent. Evaluators who are not restricted by the "equal contribution" fallacy will ask:

1. Did the presumed flaws of the parent emerge just before the child's alienation, such as might be the case with a newly acquired closed-head injury, or have the parent's offensive traits and behavior coexisted in the past with cordial parent-child relations?
2. Would the rejected parent's weaknesses result in the child's alienation under normal circumstances regardless of the favored parent's attitudes and behavior?
3. Has the favored parent played a role in focusing the child's attention on the other parent's flaws and mistakes, exaggerating the significance of the mistakes, or encouraging an unsympathetic attitude toward a parent's problems?
4. Given the favored parent's behavior, were the children likely to become alienated even in the absence of the rejected parent's presumed flaws?
5. Does the rejected parent continue to enjoy a normal relationship with the alienated child's siblings or step-siblings in spite of the personality and behavior that supposedly is the cause of the child's alienation?
6. Is the rejected parent's offensive behavior, such as a temper outburst, a maladaptive reaction to a child's rejection or is it a likely cause of the child's rejection?
7. Does the child appear motivated to improve the relationship, such as engaging meaningfully in therapy interventions, or does the child seem content with the loss of the parent?
8. Does the child show genuine interest in the parent changing his or her behavior, as in the case of a child who wants his father to watch his soccer games rather than being preoccupied with a cell phone, or does the child convey that no amount of change will be sufficient to heal the relationship?
9. Does the child regain affection when the rejected parent modifies the behavior about which the child complained, or does the alienation continue unabated despite improvements in the parent's behavior?

When evaluators mistakenly hold both parents equally culpable for the children's alienation, they are likely to avoid recommendations that they believe would disappoint and discomfort the children. They will be more inclined to recommend that the children remain with their favored parent and be allowed to avoid the other parent until therapy helps children gradually overcome their negative attitudes. In the case of severely alienated children, such a plan holds little hope for success (Dunne & Hedrick, 1994; Fidler & Bala, 2010; Garber, 2015; Lampel, 1986; Lowenstein, 2006; Rand et al., 2005; Rand & Rand, 2006; Rand, Rand, & Kopetski, 2005; Warshak, 2003a, 2013; Weir & Sturge, 2006).

When the rejected parent's behavior is inaccurately assumed to be a major factor in the children's alienation, therapy proceeds in unproductive directions. Sessions aim to modify the rejected parent's behavior, help that parent express to the children empathy for their complaints, and gradually desensitize the children to their aversion to the parent. Simultaneously, the therapist fails to appreciate the power of the aligned parent to undermine treatment progress. Because the children's alienation is not primarily the result of the rejected parent's behavior, the more that the process validates the children's complaints as legitimate reasons for their animosity and avoidance of normal contact, the deeper becomes the chasm between the parent and the children.

Evaluators and therapists should avoid unwarranted assumptions about the roots of a child's rejection of a parent. Instead they should remain neutral and attentive to all factors that contribute to a child's alienation. In cases where the child's negative attitudes are traced primarily to the behavior and influence of the parent with whom the child is aligned, professionals and the court should be aware of the literature that stresses the importance of an alienated child's contact with the rejected parent (Fidler & Bala, 2010; Garber, 2015; Warshak, 2003a).

4. Alienation Is a Child's Transient, Short-Lived Response to the Parents' Separation

Parents and those who advise them often mistake the incipient signs of a child's pathological alienation as a temporary reaction to the anxiety stirred by the parents' separation. In some cases this reflects the belief, or wishful thinking, that children who resist being with a parent eventually initiate reconciliation. Some do. But many do not.

Based on a sample of 37 young adults who received family focused counseling, Johnston and Goldman (2010) speculated that alienation that emerges for the first time in the early teens will eventually dissipate. But the lead researcher on that longitudinal project referred to the lasting damage caused by parents who manipulate children to turn against their other parent (Wallerstein & Blakeslee, 1989). Warshak (2010b) reported an intervention outcome study in which the average length of time of alienation was 2.5 years; some children had been alienated for as long as five years, and prior to the intervention none of the children gave any indication that the alienation would abate. In a sample of adults who reported being alienated as children, the disrupted parent-child relationship lasted for at least six years in all cases and continued for more than 22 years for half the sample (Baker, 2005). Gardner (2001) reported 33 cases in which alienation persisted for more than two years. In a sample of college students, 29% from divorced homes remained alienated from a parent (Hands & Warshak, 2011).

Therapists who predict that a child's resistance to spending time with a parent will evaporate in the near future are apt to focus therapy on helping the child cope with unpleasant feelings aroused by the parents' breakup. In such cases therapists may encourage parents to passively accept their children's reluctance or refusal to spend time with them, and often advise a "cooling off period" in which the rejected parent temporarily relinquishes active efforts to reestablish regular contact with the children (Darnall & Steinberg, 2008b). Therapists who recognize that they may be seeing the early signs of chronic alienation are apt to encourage more normal parent-child contacts while working on uncovering the roots of the child's discomfort. Such encouragement protects against crucial losses; missing out on even two formative years of parent-child contact means an accumulation of lost experiences that can never be recovered.

The emotional and financial costs exacted by severe alienation, and the obstacles to its alleviation, highlight the importance of directing resources and efforts to early screening, identification, and protection of children at risk and to preventing the entrenchment of severe alienation (Jaffe, Ashbourne, & Mamo, 2010; Warshak, 2010c, 2013, in press). Consulting psychologists should advise lawyers to encourage clients to maintain contact with their children despite the children's scorn, except in situations that raise concern over the safety of the parent or child. Lawyers should move quickly for sanctions when orders for parent-child contacts are violated. Warshak (in press) provides practice tips for lawyers, which consultants can draw on when advising lawyers representing a parent who is alienated or at risk for becoming alienated.

Evaluators should attend to indications that a parent is inappropriately drawing the children into an alliance against the other parent, or engaging in behavior that carries a high likelihood of undermining the children's respect and affection for the other

parent. Similarly, evaluators should attend to early signs that a child is succumbing to such pressures by forming an unhealthy alignment with a parent and by unreasonably resisting or refusing to spend time with the other parent.

When a case raises concerns that a child, with a parent's encouragement, support, or acceptance, may refuse contact with the other parent without adequate justification, the court may consider several options implemented in a tiered, stepwise manner and preferably on a fast track (Salem, 2009). A first step is parent and child education programs. Some courts require parents to read books and view material to learn how and why to avoid behaviors that influence children to align with one parent against the other, and then to provide evidence of compliance with the assignment such as a book report (Warshak, in press). Many courts require litigants to attend a parent education program designed for parents who live apart from each other. Such programs operate in at least 46 states (Salem, Sandler, & Wolchik, 2013; Sigal, Sandler, Wolchick, & Braver, 2011). In a recent evaluation of one program, parents reported a reduction in behaviors that placed children in the middle of conflict (LaGraff, Stolz, & Brandon, 2015).

In cases where parent education has proved insufficient to modify alienating behaviors and interrupt the decline of a parent-child relationship courts often appoint a mental health professional to work with the family. Interventions strive to reduce alienating behaviors by helping parents appreciate the importance of shielding their children from such messages. Parents who are the target of bad-mouthing learn to respond in a sensitive and effective manner to their children's behavior and avoid common errors that may exacerbate parent-child conflicts (Ellis, 2005; Warshak, 2010a). Children learn to assert their right to give and receive love from both parents and avoid being pulled into their parents' disputes. The literature presents several models and strategies for working with families in which school-age children are alienated, but lacks rigorous outcome data (Carter, 2011; Eddy, 2009; Freeman, Abel, Cooper-Smith, & Stein, 2004; Friedlander & Walters, 2010; Johnston & Goldman, 2010; Sullivan, Ward, & Deutsch, 2010).

The court may try to motivate alienating parents to modify their behavior by putting them on notice that if the child's relationship with the other parent continues to deteriorate, and the court finds that the aligned parent's behavior is largely responsible for the problem, the court will entertain options that provide more time for the child to be in the care of the alienated parent. In some cases the court hears testimony that raises concerns that a child is being severely mistreated, such as in cases where a parent, intent on erasing the other parent from the child's life, punishes the child for expressing any desire to see the other parent. Such cases may rise to the level where the judge believes that the child is being psychologically abused and the judge feels obliged to protect the child from further abuse by requiring supervision or monitoring of the child's contacts with the alienating parent.

5. Rejecting a Parent Is a Short-Term Healthy Coping Mechanism

A corollary to the view that alienation is transient is that it reflects healthy behavior on the part of a child struggling to come to grips with a family transition and turmoil (Drozd & Olesen, 2004). The assumption is that children want to regulate access to

their parents to accomplish two goals: (a) Exercise control in a situation where they are helpless to stop their world from unraveling, and (b) relieve themselves of torn loyalties by siding with one parent against the other, and reduce discomfort with this position by devaluing and avoiding contact with the rejected parent. No doubt such motives play a part in the genesis of parental alienation for some children. But is this behavior healthy and in the children's best interests?

Studies converge to suggest a conservative estimate that 2% to 4% of children become alienated from a parent after the divorce (Warshak, in press). Although this represents a large number of children, an alienated relationship with a parent is clearly a deviation from the norm even among children whose parents are divorced. Most children want regular contact with both parents after divorce (Fabricius, 2003; Fabricius & Hall, 2000; Hetherington & Kelly, 2002; Parkinson, Cashmore, & Single, 2005; Schwartz & Finley, 2009; Warshak & Santrock, 1983).

Therapists who believe that rejection of a parent is a healthy adaptation encourage parents to accept the children's negativity until the children feel ready to discard it. This is especially true when therapists assume that the alienation is destined to be short-lived. But as discussed above, the alienation may not be transient, and is not healthy if the children's negative attitudes and avoidant behavior harden into a long-term or permanent problem. Growing up with a severely conflicted or absent relationship with a parent is associated with impaired development (McLanahan, Tach, & Schneider, 2013).

A problem that seems at the outset as a temporary difficulty coping with a life transition can, if handled ineffectively, become more long lasting. An analogy is a child who has trouble adapting to the changes entailed by attending Kindergarten instead of remaining home all day. Ordinarily we would work to help the child cope effectively with this expected life transition. If instead we indulged the child's wish to avoid the experience, the child would lose an important opportunity to grow through mastery as well as miss out on the value that school attendance offers.

In their reports and testimony child custody evaluators and educative experts should emphasize that early intervention and rapid enforcement of court ordered parent-child contacts can help prevent a child's avoidance of a parent from hardening into a long-term estranged relationship, especially when the avoidance is encouraged and supported by the other parent (Fidler, Bala, Birnbaum, & Kavassalis, 2008, p. 257; Warshak, in press). Courts should recognize that enforcing the court-ordered parenting plan can alleviate the burden of children who feel that they have to choose between their parents or show loyalty to one parent by rejecting the other.

Fallacies About Remedies for Parental Alienation

6. Young Children Living With an Alienating Parent Need No Intervention

The need for intervention may sometimes be less apparent in families with young children who live with a parent who teaches them to fear or hate the other parent. Toddlers and preschoolers may fulfill a parent's expectations by acting fearful and resistant during scheduled transfers to the other parent's care (Fidler et al.,

2008, p. 243; Lund, 1995). If the child's overt, albeit temporary, feelings are indulged, and the child's protests allowed to abort the planned exchange, the protests are likely to emerge and become more intense at each subsequent attempt to implement the parenting time plan. If instead the child is given the opportunity to spend time with the denigrated parent outside the orbit of the alienating parent, the fearful and angry behavior quickly evaporates (Fidler et al., 2008, p. 242; Kelly & Johnston, 2001; Lund, 1995; Warshak, 2010b; Weir, 2011). When meeting with a custody evaluator, young children may try to repeat a script written by the alienating parent. But often they forget what they are supposed to say and cannot answer questions for which they were not rehearsed (Kelly & Johnston, 2001; Ludolph & Bow, 2012).

Because the young child loses the negative reaction and warms up to the denigrated parent during contacts with the parent, and does not show stable and chronic negative attitudes and behavior, a common mistake is to overlook the need for intervention (Weir, 2011). Therapists have noted children's confusion and anger resulting from exposure to alienating processes regardless of the very young child's apparent resilience (Ludolph & Bow, 2012). Depending on their severity and cruelty, alienating behaviors may approach or reach levels of psychological abuse and children may need protection from the abusive parent.

Without help to change, the family environment places these children at risk to develop a fragmented identity with the characteristics and consequences of irrational alienation and of parental absence (Roseby & Johnston, 1998). Children who live in an environment that consistently encourages them to view a parent in a negative light need assistance to maintain a positive relationship with that parent. Such assistance may be to give the child more time with the parent who is at risk for becoming the alienated parent. Or, the court may appoint professionals to help the parents modify behaviors that contribute to a child's problem and to monitor compliance with court orders. An added benefit of involving a professional with the family, either in the role of parenting coordinator, guardian ad litem, or therapist, is that the professional's observations may subsequently assist the court in evaluating the merits of conflicting accounts offered by parents in litigation (Fidler et al., 2008, p. 265).

7. Alienated Adolescents' Stated Preferences Should Dominate Custody Decisions

Many child custody evaluators and courts place more weight on a teenager's preference to sever contact with a parent than on similar preferences of younger children (Gould, 1998). In any given case, one of two rationales underpins the deference given to adolescent's stated wishes. In some cases decision makers emphasize that adolescents have the cognitive capacity to form mature judgments that are independent of their favored parent's influence and manipulations. In other cases the court finds that the alienation is unreasonable and that it is not in the children's best interests to sever their relationship with a parent; nevertheless the court concludes that expectations for compliance with court orders for contact cannot be enforced with teenagers who voice strong opposition to the orders and profess to hate a parent.

Teens know what is best for them. Adolescents, in general, are more capable than younger children of mature reasoning (Steinberg & Cauffman, 1996; Wechsler, 1991) and are less sug-

gestible (Ceci & Bruck, 1993, 1995). They are also better able to convince others that their wish to avoid or disown a parent is a reasonable, thoughtful, and proportionate response to the treatment they claim to have suffered at the hands of the rejected parent. I have been involved in several cases in which the judge initially accepted the custody evaluator's conclusion that an adolescent's alienation was irrational, until the judge spoke with the child. The teenager was able to convince the judge either that the choice to reject the parent was reasonable, or that the judge could trust the teenager to reunite with the parent in the future without being compelled to do so by court order. In each case, after the litigation was over, the child remained estranged from the parent.

Despite their more mature cognitive capacities compared with younger children, adolescents are suggestible, highly vulnerable to external influence, and highly susceptible to immature judgments and behavior (Loftus, 2003; Steinberg, Cauffman, Woolard, Graham, & Banich, 2009; Steinberg & Scott, 2003). These limitations are well known in the fields of adolescent development and neuropsychology, and account in part for the consensus view of psychologists that juveniles merit different treatment by the legal system than adults receive (American Psychological Association, 2004).

Adolescents' vulnerability to external influence is why parents are wise to worry about the company their teenagers keep. At times adolescents show extreme deference to others' views. Other times they make choices primarily to oppose another's preferences (Steinberg & Cauffman, 1996). Both of these dynamics can result in the formation of a pathological alliance with one parent against the other. Grisso (1997) points out that the preferences of adolescents often are unstable. Choices made early in the process of identity formation often are inconsistent with choices that would be made when a coherent sense of identity is established, generally not before age 18. For these reasons, even the preferences of adolescents merit cautious scrutiny, rather than automatic endorsement. It is also important to keep in mind that the alienation may have arisen years before the litigation when the child was probably even more vulnerable to a parent's influence and less able to assert mature and independent judgment. Thus the custodial preferences voiced by an adolescent may reflect preferences formed by a much younger child.

Courts cannot enforce orders for parent-child contact against an alienated teen's wishes. A judge who understood that a 13-year-old's decision to sever his relationship with his father reflected impaired judgment nevertheless acquiesced to the boy's demands because, "He is now of an age where, even if he may be too immature to appreciate what is best for him, he cannot be physically forced to remain where he does not want to be" (Korwin v. Potworowski, 2006, ¶ 145). This judge is not alone. Other judges, child representatives, parenting coordinators, psychotherapists, and parents often report feeling stymied when adolescents refuse to cooperate with the court-ordered parenting time schedule (DeJong & Davies, 2012; Johnston, Walters, & Friedlander, 2001). These children can be so convincing about their resolve to have their way with respect to avoiding a parent that they convince the court that they are beyond its authority. They induce a sense of helplessness in judges.

Adults need not feel helpless in the face of oppositional behavior from alienated teens. Two studies have reported that most children's protests evaporate when reunited with a rejected parent

(Clawar & Rivlin, 2013; Warshak, 2010b) and this is illustrated anecdotally by high profile cases (Warshak, in press). Instead of appeasing children's demands, the court can order an intervention to assist children in adjusting to court orders that place them with their rejected parent (Warshak, 2010b).

Adolescents comply with many rules and expectations that are not of their own choosing. It is an error to assume that they do not benefit from an assertion of authority on the part of the court and their parents. Teens need adult guidance, structure, and limits as much as if not more than do younger children. When a teen has been violent toward a rejected parent, allowing the teen's wishes to determine the outcome of a custody case can be seen as rewarding violent behavior (Warshak, 2010b). Children of any age need to understand that they are not above the law or beyond its reach.

Child custody evaluators and educative experts should inform the court about the benefits and drawbacks of various means of giving adolescents a voice in a custody dispute (Dale, 2014; Warshak, 2003b). Courts also need to learn about the suggestibility of adolescents and their susceptibility to immature judgment and external influence.

If the evidence suggests that the child's viewpoints do not reflect mature judgment independent of the other parent's unhealthy influence, or the child's expressed preferences are unlikely to serve the child's best interests, the court should impress on the adolescent, either directly or through agents of the court, the necessity of complying with the residential schedule put in place by the court. The parents and the child should understand that failure to comply with court orders will not be overlooked and will not result in the court capitulating to the overt demands of the adolescent. A firm stance by the court brings the added benefit of relieving the child of needing to maintain a parent's approval by refusing to spend time with the other parent.

8. Children Who Irrationally Reject a Parent But Thrive in Other Respects Need No Intervention

Some custody evaluators and decision makers oppose interventions for alienated children if the parent-child conflict is an exception to a child's apparent good adjustment in other spheres, such as in school and with peers. These professionals believe that children who are doing well in other aspects of life should be empowered to make decisions regarding contact with a parent. Professionals who advocate this position express concerns that interventions for resistant youth, such as court-ordered outpatient therapy, may disrupt the children's psychological stability, are likely to prove unsuccessful, and will leave children feeling angrier toward the court or the rejected parent (Johnston & Goldman, 2010). Other professionals counsel a hands-off policy toward these children until we have more studies that document long-term damage of growing up irrationally alienated from a parent.

Warshak (in press) presents three reasons to intervene on behalf of alienated children despite their apparent good adjustment in areas unrelated to their relationship with the rejected parent. First, children's apparent good adjustment may be superficial or coexist with significant psychosocial problems. Second, regardless of adjustment in other spheres, the state of being irrationally alienated from a loving parent is a significant problem in its own right and is accompanied by other indices of psychological impairment. Third, growing up apart from and in severe conflict with an able

parent risks compromising children's future psychological development and interpersonal relationships.

Psychosocial problems. Children can do well academically, participate in extracurricular activities, avoid drugs, and act polite with teachers and neighbors, while at the same time sustain significant psychological impairment evident in their relationships with friends, their favored parent, and legal authorities. The psychological processes that accompany irrational rejection and cruel treatment of a parent bleed into other relationships. These processes include global thinking about others as allies or enemies, contempt for those who see things differently, feelings of entitlement in personal relationships, and avoidance of conflict. When conflicts arise with friends, alienated children who have been empowered to reject a parent are apt to do the same with friends; they avoid conflicts by abruptly ending friendships rather than practicing skills to manage conflict and sustain relationships (Kelly & Johnston, 2001; Johnston et al., 2001).

Alienated children's relationship with their favored parent may seem ideal because of the absence of conflict and frustration. This harmony comes at the cost of normal parent-child relationships. In a shift from the usual roles in a family, some alienated children feel responsible for their favored parent's emotional well-being (Warshak, 1992). They comfort distressed parents, serve as confidantes, and reassure parents of their allegiance (Friedlander & Walters, 2010).

Alienated children often sacrifice age-appropriate independent functioning to gratify favored parents' needs to keep the children close at hand and dependent. Mental health professionals describe such parents as infantilizing their children, and refer to the overly close parent-child relationships that emerge from such parenting as enmeshed (Ellis & Boyan, 2010; Friedlander & Walters, 2010; Garber, 2011; Kelly, 2010). The extent to which a parent infantilizes a child is less evident in the child's early years. As the child gets older, the failure to achieve normal degrees of separation and independence becomes more obvious, as in the case of a teenager who continues to sleep with a parent or avoids attending summer camp.

Some children feel that the price they must pay to court the favored parent's affection, and avoid that parent's anger, is to reject the other parent (Friedlander & Walters, 2010). They conceal positive feelings for and experiences with the rejected parent and feel inhibited about giving and receiving love from that parent. This limits the genuine closeness between the favored parent and children because the children hide important aspects of themselves from the parent.

Alienated children comply with adults' expectations when these do not clash with the children's strong preferences. But when their wishes conflict with limits imposed by others, they act entitled to have their desires prevail. Thus, children who are described as model citizens in their schools and communities openly defy judges and fail to cooperate with court-ordered parenting time schedules (Clawar & Rivlin, 2013; Warshak, 2010b). The children speak and act as if they were above the law and immune from external controls on their behavior.

Psychological problems inherent in irrational rejection of a loving parent. We need not identify scholastic or social adjustment problems outside the family to be concerned about an alienated child's psychological state. Harboring irrational alienation from a parent, as with most significant irrational aversions, is a

sign of a psychological problem in itself. Unreasonable anxieties or obsessive hatred and fixed negative stereotypes justify intervention to alleviate suffering and this is no less true when the target of aversion is a parent.

The rationale for interventions with families in which a child unreasonably rejects a parent goes beyond helping the family avoid the tragedies of a child losing a parent and a parent losing a child. These children need help to overcome cognitive, emotional, and behavioral impairments that accompany their alienation, and their parents need help to cope effectively with the children's behavior and to support the children's healthier functioning (Friedlander & Walters, 2010; Kelly, 2010; Warshak, 2010b, 2013, in press). In its description of the diagnostic category "Parent-Child Relational Problem," the *Diagnostic and Statistical Manual Of Mental Disorders*, fifth edition (American Psychiatric Association, 2013) gives these examples of impaired cognitive functioning, which certainly describe the alienated child's relationship to the rejected parent: "negative attributions of the other's intentions, hostility toward or scapegoating of the other, and unwarranted feelings of estrangement" (p. 715).

The damage to critical thinking is evident in cases where children align with one parent's view of reality in spite of conflicting objective evidence and the unanimous judgment of numerous professionals and the judge. In several cases a mentally ill parent has convinced a child that the police, lawyers on both sides of the case, therapists, and the judge conspired against the parent during custody litigation. Some children are coached to make false accusations against a parent. For instance, 10 years after their mother was convicted of attempted sexual abuse based on the testimony of her two sons, the boys confessed that their father coached and intimidated them into branding their mother as a sex offender (People v. Bronson, 2011). In another case, a boy gouged his face and told police that his mother did it. Such displays of impaired character development can exist alongside excellent academic, musical, or athletic performance (Warshak, 2010a) and should not be ignored by those concerned about the child.

Risks to future development. Research on the long-term outcome of children who grow up irrationally alienated from a parent is sparse. But several well-developed lines of investigation provide data relevant to understanding the consequences of parental alienating behavior and of exposing children to poorly managed interparental conflict (Cummings & Davies, 2010; Davies & Martin, 2014; Hetherington, Bridges, & Insabella, 1998; Kelly, 2005, 2010). Intrusive parenting that manipulates children's experience and expression of emotions has been linked to subsequent higher levels of depression and antisocial behavior (Barber, Stolz, & Olsen, 2005). Children who witness and are brought into conflicts between their parents show poorer long-term adjustment (Buchanan, Maccoby, & Dornbusch, 1991; Davies & Martin, 2014). In one study, the greater the discrepancy between the amount of nurturing and involvement children received from each parent—and for severely alienated children the discrepancy is the most extreme—the lower their subsequent self-esteem, life satisfaction, and quality and satisfaction with friendships, and the greater distress, romantic relationship problems, and troubled ruminations about parents these children experienced as young adults (Finley & Schwartz, 2010). Warshak (in press) reviews additional literature that demonstrates the handicapping impact of damaged and con-

flicted parent–child relationships on future psychological adjustment.

To summarize, we should not let a child's good academic grades, friends, and community activities distract attention from serious problems in character development and interpersonal relationships; from impaired functioning in cognitive, emotional, and behavioral domains; from unnecessary yet significant losses; and from the long-term consequences of growing up with such losses and with unresolved and unnecessary conflict with a loving parent. Such contemporary and future problems signal the need for intervention. Even when an alienated child is apparently well adjusted in some domains, evaluators should remain alert to the presence of such problems. In their reports and testimony evaluators should articulate the signs of the child's impaired psychological functioning and should inform the court of the short-term and long-term harm associated with the state of being unreasonably alienated from a good parent.

9. Severely Alienated Children Are Best Treated With Traditional Therapy Techniques While Living Primarily With Their Favored Parent

By the time cases with severely alienated children are adjudicated, families often have sought remedies from one or more psychotherapists. Despite the failure of previous treatments, courts frequently order another course of therapy or counseling while the children remain under the care of the parent with whom they are aligned.

Research on interventions for severely alienated children is an emerging field (Saini, Johnston, Fidler, & Bala, 2012). Case studies and clinical experience suggest that psychotherapy while children remain under the care of their favored parent is unlikely to repair damaged parent–child relationships and may make things worse (Dunne & Hedrick, 1994; Fidler & Bala, 2010; Garber, 2015; Lampel, 1986; Lowenstein, 2006; Rand & Rand, 2006; Rand et al., 2005; Warshak, 2003a; Weir & Sturge, 2006). No study has demonstrated effectiveness of any form of psychotherapy in overcoming severe alienation in children who have no regular contact with the rejected parent.

Some therapists conceptualize alienated children's problems as phobic responses to the rejected parent (Garber, 2015; Lampel, 1986). Therapists using this framework recommend cognitive–behavioral therapy methods, particularly systematic desensitization in which gradual exposure to the feared parent is paired with relaxation training (Garber, 2015). Garber gave two case illustrations using these methods. After 17 sessions interspersed with the therapist's ongoing support, an 8-year-old girl was able to tolerate only online contact with her alienated mother before litigation erupted and reunification efforts were suspended. The second case illustration reported that after seven sessions a 12-year-old boy was able to be nearly free of anxiety while *imagining* contact with his alienated father, yet the case report notably included no information about the child's actual reconciliation with his father. Lampel (1986) reported on six cases using phobia reduction techniques; none resolved the child's alienation.

One reason why phobia reduction techniques fail to overcome children's refusal to spend time with a parent is that most of these children, except preschoolers, do not really fear their rejected parent. If they act frightened of the parent, often this is a ruse to

avoid contact. The lack of genuine fear is evident in the children's uninhibited denigration, expressions of hatred, and disrespect toward the rejected parent, as opposed to the obsequious or withdrawn behavior typical of children's interactions with a feared adult. Even with children who have learned to fear a parent, systematic desensitization may miss the mark for another reason. This treatment method helps children gradually overcome irrational anxieties toward places and objects (Wolpe, Brady, Serber, Agras, & Liberman, 1973). But an alienated child's aversion to one parent is not solely internally generated. Phobic children are surrounded by adults who encourage them to overcome their fears and who emphasize the benefits of doing so. By contrast, alienated children who live in the home in which their problem arose are around a parent, and perhaps siblings or other relatives, who at the very least provide no effective encouragement to overcome their aversion, and in most cases actively contribute to its perpetuation.

As opposed to the poor response of alienation to traditional therapy techniques, marked reduction of alienation has been reported for children who were placed for an extended period of time with their rejected parent (Clawar & Rivlin, 2013; DeJong & Davies, 2012; Dunne & Hedrick, 1994; Gardner, 2001; Lampel, 1986; Rand et al., 2005; Warshak, 2010b, in press). Despite limitations such as small sample sizes and lack of random assignment to treatment conditions, the collective weight of the literature suggests that contact with the rejected parent is essential to healing a damaged parent–child relationship. No evidence supports the efficacy of treating severely alienated children while they remain primarily in the custody of their favored parent and out of touch with their rejected parent. Not only is such treatment unlikely to succeed, it postpones getting children the relief they need.

When an evaluation finds that a child is severely and irrationally alienated from a parent, and that it is in the child's best interests to repair the damaged relationship, the evaluator should exercise caution about recommending a course of traditional psychotherapy while the child remains apart from the rejected parent. Recommendations for therapy in such circumstances should include advice to the court about imposing (a) a time frame after which the impact of treatment will be assessed, (b) explicit criteria for evaluating progress and success of treatment, and (c) contingency plans in the event that the treatment is ineffective. For instance, if the judge informs the parties that a failed course of therapy may result in an increase in the child's time with the rejected parent or in a reversal of custody, this may help increase the child's motivation to participate meaningfully in treatment and the favored parent's support for treatment gains.

A therapist's facilitation of a child's complaints about a parent and rehashing conflicting accounts of the parent's past behavior may be counterproductive and prevent the parent and child from having experiences that move the relationship in a positive direction. Instead interventions can teach children and parents about (a) the nature of negative stereotypes, (b) the hazards of selective attention, (c) the ubiquity of perceptual and memory distortions, (d) the importance of recognizing multiple perspectives, (e) critical thinking skills, (f) effective communication and conflict management skills, and (g) the value of maintaining positive and compassionate relationships with both parents (Warshak, 2010b).

The court should be informed that psychotherapy is most likely to be effective if (a) there have been no prior failed attempts, (b) the parent with whom the child is aligned is likely to cooperate and

support the child's treatment and progress, and (c) the child has ample time to experience care and nurturing from the rejected parent. On the other hand, if one of more attempts with psychotherapy have already failed to remedy the problem, if the aligned parent is likely to sabotage treatment, and if the child is empowered to avoid contact with the rejected parent, the court should understand that ordering another round of psychotherapy without changing the amount of contact the child has with each parent is unlikely to remedy the problem and may postpone effective intervention until it is too late. In circumstances where treatment failure is highly likely and may aggravate problems, court-appointed therapists should not unnecessarily prolong treatment. Early in the treatment the therapist may feel ethically bound to inform the court that treatment should be discontinued.

10. Separating Children From an Alienating Parent Is Traumatic

Despite repeated reports that alienation abates when children are required to spend time with the parent they claim to hate or fear, some experts predict dire consequences to children if the court fails to endorse their strong preferences to avoid a parent. Usually such predictions are vulnerable to reliability challenges because the experts cite undocumented anecdotes, irrelevant research, and discredited interpretations of attachment theory. No peer-reviewed study has documented harm to severely alienated children from the reversal of custody. No study has reported that adults, who as children complied with expectations to repair a damaged relationship with a parent, later regretted having been obliged to do so. On the other hand, studies of adults who were allowed to disown a parent find that they regretted that decision and reported long-term problems with guilt and depression that they attributed to having been allowed to reject one of their parents (Baker, 2005).

Some evaluators and expert witnesses cite attachment theory to support predictions of trauma and long-term psychological damage to children who are separated from an alienating parent and placed with their rejected parent (Jaffe et al., 2010). Such predictions are rooted in research with children who experienced prolonged institutional care as a result of being orphaned or separated from their families for other—often severely traumatic—reasons (Ludolph & Dale, 2012). A consensus of leading authorities on attachment and divorce holds that contemporary attachment theory and research do not support generalizing the negative outcomes of traumatized children who lose both parents, to situations where children leave one parent's home to spend time with their other parent (Warshak, with the endorsement of the researchers and practitioners listed in the Appendix, 2014). Despite initial protests and demands, once reunited with the rejected parent most children recover the positive feelings that had been dormant since the onset of alienation or that they did not feel free to express.

Anchoring the conversation with predictions of lasting trauma and self-destructive behavior can make it seem inhumane to enforce a child's contact with the rejected parent. When experts anchor their testimony to terms like trauma and attachment—"when a child is described as 'traumatized' if he is, instead, only unsettled"—attorneys should challenge the experts to unpack evocative jargon (Zervopoulos, 2013, p. 180). The lack of empirical support for such pessimistic predictions can be contrasted with the benefits of removing a child from the daily care of a disturbed

parent whose behavior is considered psychologically abusive (Clawar & Rivlin, 2013; Kelly & Johnston, 2001; Rand, 2011) and placing the child with a parent whom the court finds to be better able to meet the child's needs, especially the need to love and respect two parents. Separating children from an alienating parent is one among several possible dispositions of a case involving alienated children (Warshak, 2010b, 2013, in press). Warshak (in press) describes 10 reasons why courts may find it to be in children's best interests to temporarily suspend their contact with their favored parent while the children reunite with the rejected parent. This will not always be the best option. But it should not be dismissed based merely on the fallacy that a child will be traumatized if expected to have contact with a good parent whom the child irrationally claims to hate or fear.

Recommendations to place a child with the rejected parent and temporarily suspend contact with the favored parent should include consideration of interventions and resources to ease the family's adjustment to the court orders. Effective interventions should provide experiences to help uncover the positive bond between child and parent. Norton (2011) draws on developmental psychology and neurobiology to emphasize the importance of providing children and adolescents with experiences that facilitate empathy, connection, and wellness: "These experiences can help them to create a new narrative about their lives, one that is more cohesive, more hopeful, and allows them to begin to see themselves in a new place" (p. 2). Family Bridges (Warshak, 2010b) is one intervention that specializes in assisting with the transition by providing face-saving, transformative experiences that help children recover their affection for their rejected parent. A 4-day workshop helps children develop compassion for both parents and prepares the children and the parent who received custody to live together by teaching respect for multiple perspectives, and skills in critical thinking, communication, and conflict management.

When a court orders a child to spend time with a rejected parent despite the child's adamant objections, some commentators regard it as a severely harsh solution even when the child has help to adjust to the transition. Given the damage to children who remain alienated from a parent, such a disposition may be seen as far less harsh or extreme than a decision that consigns a child to lose a parent and extended family under the toxic influence of the other parent who failed to recognize and support the child's need for two parents.

Summary and Conclusions

The 10 fallacies discussed in this article shape opinions and decisions regarding children who unreasonably reject a parent. The fallacies are listed below along with a brief summary of practice recommendations.

Fallacies About the Genesis of Parental Alienation

1. Children never unreasonably reject the parent with whom they spend the most time.

2. Children never unreasonably reject mothers.

Practice recommendations. Professionals should guard against allowing false assumptions about the genesis of alienation to influence the development and analysis of data. When

such biases are evident in the work of other professionals in the case, experts should expose the underlying fallacies and explain how mistaken acceptance of the fallacies limits the trustworthiness of information and opinions reported to the court. Professionals and the court should keep an open mind about the possibility that children's rejection of a parent is unwarranted and that unreasonable rejection can be directed at the parent with whom the children spend the most time, even when this parent is their mother.

Experts who opine that a child's alienation must be a realistic reaction to the rejected parent's behavior because pathological parental alienation is a bogus concept should rethink their position in the light of an extensive literature. Experts hired to critique the opinions of colleagues who deny the reality of pathological parental alienation should draw attention to the field's acceptance of the concept and phenomenon.

3. Each parent contributes equally to a child's alienation.

Practice recommendations. Evaluators should avoid anchoring data gathering and analyses with the "equal contribution" fallacy. Instead the evaluation should address a series of questions that help distinguish reasonable and justified alienation from unreasonable and unjustified alienation that is not in a child's best interests to sustain. Prominent factors to consider are the history of parent-child relationships, the timing and context of the onset of the alienation, the likelihood that each parent's behavior, on its own, would result in the child's alienation, and the motives and reasonableness of the complaints that a child makes to account for the rejection of a parent. In cases where the child's negative attitudes are traced primarily to the behavior and influence of the parent with whom the child is aligned, professionals and courts should be aware of the importance of keeping the alienated child in contact with the rejected parent. Therapists should address the cognitive processes that underlie a child's distortions of the rejected parent and work to improve relational skills of the parents and child. With an irrationally alienated child, such an approach is likely to be more productive than focusing therapy on the child's repetitive complaints about a parent.

4. Alienation is a child's transient, short-lived response to the parents' separation.

5. Rejecting a parent is a short-term healthy coping mechanism.

Practice recommendations. Knowing that it is false to assume that a child's rejection of a parent is likely to be brief, and false to regard such rejection as a healthy way to cope with a family in transition, emphasis should be placed on early identification and protection of children at risk. Interventions by therapists and the court should aim for rapid enforcement of parent-child contacts while providing support for the family to adjust to the situation. Cases in which a child—with a parent's encouragement, support, or acceptance—may refuse contact with the other parent without adequate justification, should be placed on a fast track. Rapid responses may prevent alienation from becoming entrenched. The court may implement several steps as needed, including parent education, court-ordered treatment, and contingencies to motivate an alienating parent to modify destructive behavior.

Fallacies About Remedies for Parental Alienation

6. Young children living with an alienating parent need no intervention.

Practice recommendations. Because young children who live with an alienating parent are at risk for disruptions in their identity formation and in their long-term relationship with their other parent, the court should maintain oversight and put in place mechanisms to ensure that the child has ample opportunity to develop a healthy, positive relationship with both parents. Evaluators may recommend that the child have more time with the parent who is at risk of becoming alienated, and that the court appoint professionals to help the family better manage the situation, monitor compliance with court orders, and provide needed feedback to the court. In the most severe cases children may need protection from psychological abuse by the alienating parent.

7. Alienated adolescents' stated preferences should dominate custody decisions.

Practice recommendations. Custody evaluators and educative experts should be aware, and be prepared to inform the court, that adolescents are suggestible, highly vulnerable to external influence, and highly susceptible to immature judgments, and thus we should not assume that their custodial preferences reflect mature and independent judgment. If an adolescent's best interests would be served by repairing a damaged relationship with a parent, evaluators' recommendations and court decisions should reflect the benefits of holding adolescents accountable for complying with appropriate authority. Although adolescents protest many of society's rule and expectations, they will generally respond to reasonable limits when these are consistently and firmly enforced.

8. Children who irrationally reject a parent but thrive in other respects need no intervention.

Practice recommendations. Evaluators should be careful not to overlook an alienated child's psychological impairments that may be less apparent than the child's good adjustment in domains such as school and extracurricular activities. Evaluators can assist the court's proper disposition of a case by identifying the cognitive, emotional, and behavior problems that accompany irrational aversion to a parent, as well as the potential long-term negative consequences of remaining alienated from a parent.

9. Severely alienated children are best treated with traditional therapy techniques while living primarily with their favored parent.

Practice recommendations. The poor track record of traditional psychotherapy with alienated children who live predominantly with their favored parent should inform evaluators' recommendations of interventions. Therapists should not prolong therapy with alienated children in circumstances where the therapy has little chance of success. Effective interventions provide transformative experiences that help children relinquish negative attitudes while saving face.

10. Separating children from an alienating parent is traumatic.

Practice recommendations. Custody evaluators should avoid offering opinions that reflect sensationalist predictions lacking a basis in established scientific and professional knowledge. When previous interventions have proved inadequate, a wide range of options should be considered to assist families with alienated children, including placing a child with the rejected parent, tem-

porarily separating a child from the favored parent, or apart from both parents. Rather than automatically dismiss custody options that an alienated child strenuously opposes, the evaluator should focus on which option is likely to serve the child's best interests and what interventions can help the child adjust to the custody disposition.

Future Directions for Research

Future research will shed more nuanced light on the fallacies discussed in this paper. The greatest benefit is likely to derive from longitudinal studies of alienated parent–child relationships and of various dispositions in cases involving alienated children.

Based on flawed extrapolations from attachment theory and no empirical evidence, some evaluators and educative experts make alarming predictions about the impact of a court order that separates a child from an alienating parent even when that parent has a toxic relationship with the child. The weight of current evidence reveals that children pay a high psychological price for remaining alienated from a parent and growing up without giving and receiving expressions of love from a parent. This evidence supports dispositions that require irrationally alienated children to spend time with their rejected parent while receiving interventions, and the evidence opposes options that maintain a status quo of children remaining estranged from a parent.

Nevertheless additional documentation is needed with more studies of larger samples that compare outcomes of different dispositions using a variety of measures. We need a more robust understanding of the short-term and long-term sequelae for the entire family of various options (such as placing alienated children with the favored parent, with the rejected parent, apart from both parents, or allowing children to decide when and if they will reunite with their rejected parent). Researchers should study the psychological price that children pay for becoming and remaining alienated from a parent, but also any potential costs of requiring children to repair damaged relationships. Studies that identify markers to evaluate the maturity and independence of adolescent's judgments will assist decision makers in deciding how much weight to place on a child's stated preferences about custody, as will studies that compare outcomes for adolescents whose demands to avoid a parent were accepted versus rejected.

We need better understanding of the factors and circumstances within families that affect the long-term outcome of alternative dispositions and that favor one disposition over another in cases that raise concerns about parental alienation. At the same time it is important that we not let our focus on long-term outcomes obscure attention to the damage that a child and parent experience in the present and the need to alleviate their suffering. Families in these circumstances require greater availability of interventions that reliably prevent and overcome irrational parental alienation.

The scientific literature allows us to expose the widespread fallacies addressed in this article. Given the limitations of this literature we should not presume more knowledge than we have. Rather than approach our task with humility or with hubris, in previous work I have advocated the virtue of *humbition*: a fusion of humility and ambition (Warshak, 2007). *Humbition* allows social scientists to draw on the best available information while exercising appropriate restraint and duly noting the limitations of the current literature.

This article challenges 10 common assumptions that detract from the quality of custody recommendations, treatment, and court decisions. Accumulation and awareness of the evidence exposing these false beliefs, and an open mind to future discoveries, should guide decision makers and those who assist them to avoid biases that result in poor outcomes for alienated children. The result will be a better understanding of the needs of alienated children and decisions that are more likely to get needed relief to families who experience this problem.

References

- American Psychiatric Association. (2013). *Diagnostic and statistical manual of mental disorders* (5th ed.). Arlington, VA: American Psychiatric Association.
- American Psychological Association. (2004, July 19). [Amicus curiae brief filed in U.S. Supreme Court in *Roper v. Simmons*, 543 U.S. 551 (2005)]. Retrieved March 8, 2015, from <http://www.apa.org/psyclaw/roper-v-simmons.pdf>
- American Psychological Association. (2013). Specialty guidelines for forensic psychology. *American Psychologist*, 68, 7–19. <http://dx.doi.org/10.1037/a0029889>
- Baker, A. J. L. (2005). The long-term effects of parental alienation on adult children: A qualitative research study. *American Journal of Family Therapy*, 33, 289–302. <http://dx.doi.org/10.1080/01926180590962129>
- Baker, A., Jaffe, P., Bernet, W., & Johnston, J. (2011, May). Brief report on parental alienation survey. *Association of Family and Conciliation Courts eNEWS*, 30(2).
- Bala, N., Hunt, S., & McCarney, C. (2010). Parental alienation: Canadian court cases 1989–2008. *Family Court Review*, 48, 164–179. <http://dx.doi.org/10.1111/j.1744-1617.2009.01296.x>
- Barber, B. K., Stolz, H. E., & Olsen, J. A. (2005). Parental support, psychological control, and behavioral control: Assessing relevance across time, culture, and method. *Monographs of the Society for Research in Child Development*, 70, 1–137.
- Berns, S. S. (2001). Parents behaving badly: Parental alienation syndrome in the family court—Magic bullet or poisoned chalice. *Australian Journal of Family Law*, 15, 191–213.
- Black, B. L. (1980). *Somewhere child*. New York, NY: Viking Press.
- Bograd, M. (1984). Family systems approaches to wife battering: A feminist critique. *American Journal of Orthopsychiatry*, 54, 558–568. <http://dx.doi.org/10.1111/j.1939-0025.1984.tb01526.x>
- Buchanan, C. M., Maccoby, E. E., & Dornbusch, S. M. (1991). Caught between parents: Adolescents' experience in divorced homes. *Child Development*, 62, 1008–1029. <http://dx.doi.org/10.2307/1131149>
- Carter, S. (2011). *Family restructuring therapy: Interventions for high conflict divorce*. Scottsdale, AZ: HCI Press.
- Ceci, S. J., & Bruck, M. (1993). Children's recollections: Translating research into policy. *SRCD Social Policy Reports*, 7, No. 3.
- Ceci, S. J., & Bruck, M. (1995). *Jeopardy in the courtroom: A scientific analysis of children's testimony*. Washington, DC: American Psychological Association. <http://dx.doi.org/10.1037/10180-000>
- Clawar, S. S., & Rivlin, B. V. (2013). *Children held hostage: Identifying brainwashed children, presenting a case, and crafting solutions*. Chicago, IL: American Bar Association.
- Cross, P. (2000). *Lost children: A guide for separating parents*. London, UK: Velvet Glove Publishing.
- Cummings, E. M., & Davies, P. T. (2010). *Marital conflict and children: An emotional security perspective*. New York, NY: Guilford Press.
- Dale, M. D. (2014). Don't forget the children: Court protection from parental conflict is in the best interests of children. *Family Court Review*, 52, 648–654. <http://dx.doi.org/10.1111/fcre.12116>

- Darnall, D., & Steinberg, B. F. (2008a). Motivational models for spontaneous renunciation with the alienated child: Part I. *American Journal of Family Therapy, 36*, 107–115. <http://dx.doi.org/10.1080/01926180701643131>
- Darnall, D., & Steinberg, B. F. (2008b). Motivational models for spontaneous renunciation with the alienated child: Part II. *American Journal of Family Therapy, 36*, 253–261. <http://dx.doi.org/10.1080/01926180701643230>
- Davies, P., & Martin, M. (2014). Children's coping and adjustment in high-conflict homes: The reformulation of emotional security theory. *Child Development Perspectives, 8*, 242–249. <http://dx.doi.org/10.1111/cdep.12094>
- DeJong, M., & Davies, H. (2013). Contact refusal by children following acrimonious separation: Therapeutic approaches with children and parents. *Clinical Child Psychology and Psychiatry, 18*, 185–198. <http://dx.doi.org/10.1117/1359104512444629>
- Drozd, L. M., & Olesen, N. W. (2004). Is it abuse, alienation and/or estrangement? A decision tree. *Journal of Child Custody, 1*, 65–106. http://dx.doi.org/10.1300/J190v01n03_05
- Dunne, J., & Hedrick, M. (1994). The parental alienation syndrome: An analysis of sixteen selected cases. *Journal of Divorce & Remarriage, 21*, 21–38. http://dx.doi.org/10.1300/J087v21n03_02
- Eddy, B. (2009). *New ways for families: Professional guidebook for judicial officers, lawyers and therapists*. Scottsdale, AZ: High Conflict Institute, LLC.
- Eddy, B. (2010). *Don't alienate the kids! Raising resilient children while avoiding high conflict divorce*. Scottsdale, AZ: High Conflict Institute, LLC.
- Egizii, J. (2010). *The look of love*. Dallas, TX: Brown Books.
- Ellis, E. M. (2005). Help for the alienated parent. *American Journal of Family Therapy, 33*, 415–426. <http://dx.doi.org/10.1080/01926180500274518>
- Ellis, E. M., & Boyan, S. (2010). Intervention strategies for parent coordinators in parental alienation cases. *American Journal of Family Therapy, 38*, 218–236. <http://dx.doi.org/10.1080/01926181003757074>
- Fabricius, W. V. (2003). Listening to children of divorce: New findings that diverge from Wallerstein, Lewis, & Blakeslee. *Family Relations, 52*, 385–396. <http://dx.doi.org/10.1111/j.1741-3729.2003.00385.x>
- Fabricius, W. V., & Hall, J. A. (2000). Young adults' perspective on divorce: Living arrangements. *Family & Conciliation Courts Review, 38*, 446–461. <http://dx.doi.org/10.1111/j.174-1617.2000.tb00584.x>
- Fidler, B. J., & Bala, N. (2010). Children resisting postseparation contact with a parent: Concepts, controversies, and conundrums. *Family Court Review, 48*, 10–47. <http://dx.doi.org/10.1111/j.1744-1617.2009.01287.x>
- Fidler, B. J., Bala, N., Birnbaum, R., & Kavassalis, K. (2008). *Challenging issues in child custody disputes*. Ontario, Canada: Carswell.
- Finley, G. E., & Schwartz, S. J. (2010). The divided world of the child: Divorce and long-term psychosocial adjustment. *Family Court Review, 48*, 516–527. <http://dx.doi.org/10.1111/j.1744-1617.2010.01326.x>
- Freeman, R., Abel, D., Cooper-Smith, M., & Stein, L. (2004). Reconnecting children with absent parents: A model for intervention. *Family Court Review, 42*, 439–459. <http://dx.doi.org/10.1177/153124450404200305>
- Friedlander, S., & Walters, M. G. (2010). When a child rejects a parent: Tailoring the intervention to fit the problem. *Family Court Review, 48*, 98–111. <http://dx.doi.org/10.1111/j.1744-1617.2009.01291.x>
- Friedman, M. (2004). The so-called high-conflict couple: A closer look. *American Journal of Family Therapy, 32*, 101–117. <http://dx.doi.org/10.1080/01926180490424217>
- Garber, B. D. (2011). Parental alienation and the dynamics of the enmeshed dyad: Adulthood, parentification and infantilization. *Family Court Review, 49*, 322–335. <http://dx.doi.org/10.1111/j.1744-1617.2011.01374.x>
- Garber, B. D. (2015). Cognitive-behavioral methods in high-conflict divorce: Systematic desensitization adapted to parent-child reunification interventions. *Family Court Review, 53*, 96–112. <http://dx.doi.org/10.1111/fcre.12133>
- Gardner, R. A. (1985). Recent trends in divorce and custody litigation. *Academy Forum, 29*, 3–7.
- Gardner, R. A. (1998). *The parental alienation syndrome: A guide for mental health and legal professionals* (2nd ed.). Cresskill, NJ: Creative Therapeutics.
- Gardner, R. A. (2001). Should courts order PAS children to visit/reside with the alienated parent? A follow-up study. *American Journal of Forensic Psychology, 19*, 61–106.
- Gardner, R. A. (2002). Denial of the parental alienation syndrome also harms women. *American Journal of Family Therapy, 30*, 191–202. <http://dx.doi.org/10.1080/019261802753577520>
- Gould, J. W. (1998). *Conducting scientifically crafted child custody evaluations*. Thousand Oaks, CA: Sage.
- Greenberg, L. R., Gould-Saltman, D. J., & Gottlieb, M. C. (2008). Playing in their sandbox: Professional obligations of mental health professionals in custody cases. *Journal of Child Custody, 5*, 192–216. <http://dx.doi.org/10.1080/15379410802583684>
- Grisso, T. (1997). The competence of adolescents as trial defendants. *Psychology, Public Policy, and Law, 3*, 3–32. <http://dx.doi.org/10.1037/1076-8971.3.1.3>
- Hands, A. J., & Warshak, R. A. (2011). Parental alienation among college students. *American Journal of Family Therapy, 39*, 431–443. <http://dx.doi.org/10.1080/01926187.2011.575336>
- Hetherington, E. M., Bridges, M., & Insabella, G. M. (1998). What matters? What does not? Five perspectives on the association between marital transitions and children's adjustment. *American Psychologist, 53*, 167–184. <http://dx.doi.org/10.1037/0003-066X.53.2.167>
- Hetherington, E. M., & Kelly, J. (2002). *For better or for worse: Divorce reconsidered*. New York, NY: Norton.
- Jaffe, P. G., Ashbourne, D., & Mamo, A. A. (2010). Early identification and prevention of parent-child alienation: A framework for balancing risks and benefits of intervention. *Family Court Review, 48*, 136–152. <http://dx.doi.org/10.1111/j.1744-1617.2009.01294.x>
- Johnston, J. R., & Goldman, J. R. (2010). Outcomes of family counseling interventions with children who resist visitation: An addendum to Friedlander and Walters (2010). *Family Court Review, 48*, 112–115. <http://dx.doi.org/10.1111/j.1744-1617.2009.01292.x>
- Johnston, J. R., Walters, M. G., & Friedlander, S. (2001). Therapeutic work with alienated children and their families. *Family Court Review, 39*, 316–333. <http://dx.doi.org/10.1111/j.174-1617.2001.tb00613.x>
- Johnston, J. R., Walters, M. G., & Olesen, N. W. (2005). Clinical ratings of parenting capacity and Rorschach protocols of custody-disputing parents: An exploratory study. *Journal of Child Custody, 2*, 159–178. http://dx.doi.org/10.1300/J190v02n01_09
- Jonas, E., Schulz-Hardt, S., Frey, D., & Thelen, N. (2001). Confirmation bias in sequential information search after preliminary decisions: An expansion of dissonance theoretical research on selective exposure to information. *Journal of Personality and Social Psychology, 80*, 557–571. <http://dx.doi.org/10.1037/0022-3514.80.4.557>
- Kelly, J. B. (2003). Parents with enduring child disputes: Multiple pathways to enduring disputes. *Journal of Family Studies, 9*, 37–50. <http://dx.doi.org/10.5172/jfs.9.1.37>
- Kelly, J. B. (2005). Developing beneficial parenting plan models for children following separation and divorce. *Journal of the American Academy of Matrimonial Lawyers, 19*, 237–254.
- Kelly, J. B. (2010). Commentary on "Family Bridges: Using Insights from Social Science to Reconnect Parents and Alienated Children" (Warshak, 2010). *Family Court Review, 48*, 81–90. <http://dx.doi.org/10.1111/j.1744-1617.2009.01289.x>
- Kelly, J. B., & Johnston, J. R. (2001). The alienated child: A reformulation of parental alienation syndrome. *Family Court Review, 39*, 249–266. <http://dx.doi.org/10.1111/j.174-1617.2001.tb00609.x>
- Kopetski, L. (1998). Identifying cases of parental alienation syndrome: Part II. *Colorado Lawyer, 29*, 63–66.

- Kopetski, L. M., Rand, D. C., & Rand, R. (2006). Incidence, gender, and false allegations of child abuse: Data on 84 parental alienation syndrome cases. In R. S. Gardner, S. R. Sauber, & D. Lorandos (Eds.), *The international handbook of parental alienation syndrome: Conceptual, clinical and legal considerations* (pp. 65–70). Springfield, IL: Charles C. Thomas Publisher.
- Korwin v. Potworowski (2006). 2006 CarswellOnt 3436 (S. C. J.).
- LaGraff, M. R., Stolz, H. E., & Brnadon, D. J. (2015). Longitudinal program evaluation of “Parenting Apart: Effective Co-Parenting.” *Journal of Divorce & Remarriage*, *56*, 117–136. <http://dx.doi.org/10.1080/10502556.2014.996044>
- Lampel, A. K. (1986). Post-divorce therapy with highly conflicted families. *In Practice*, *6*, 22–26.
- Loftus, E. F. (2003). Make-believe memories. *American Psychologist*, *58*, 867–873. <http://dx.doi.org/10.1037/0003-066X.58.11.867>
- Lorandos, D., Bernet, W., & Sauber, S. R. (2013). *Parental alienation: The handbook for mental health and legal professionals*. Springfield, IL: Charles C. Thomas Publisher.
- Lowenstein, L. F. (2006). The psychological effects and treatment of the parental alienation syndrome. In R. A. Gardner, S. R. Sauber, & D. Lorandos (Eds.), *The international handbook of parental alienation syndrome: Conceptual, clinical and legal considerations* (pp. 292–301). Springfield, IL: Charles C. Thomas.
- Ludolph, P. S., & Bow, J. N. (2012). Complex alienation dynamics and very young children. *Journal of Child Custody*, *9*, 153–178. <http://dx.doi.org/10.1080/15379418.2012.715545>
- Ludolph, P. S., & Dale, M. D. (2012). Attachment in child custody: An additive factor, not a determinative one. *Family Law Quarterly*, *46*, 1–40.
- Lund, M. (1995). A therapist’s view of parental alienation syndrome. *Family & Conciliation Courts Review*, *33*, 308–316. <http://dx.doi.org/10.1111/j.174-1617.1995.tb00373.x>
- Lundgren, S. R., & Prislun, R. (1998). Motivated cognitive processing and attitude change. *Personality and Social Psychology Bulletin*, *24*, 715–726. <http://dx.doi.org/10.1177/0146167298247004>
- Martindale, D. A. (2005). Confirmatory bias and confirmatory distortion. In J. R. Flens & L. Drozd (Eds.), *Psychological testing in child custody evaluations* (pp. 31–48). New York, NY: Haworth.
- McLanahan, S., Tach, L., & Schneider, D. (2013). The causal effects of father absence. *Annual Review of Sociology*, *39*, 399–427. <http://dx.doi.org/10.1146/annurev-soc-071312-145704>
- Meyer, C. L., & Quinn, S. (1999). *They are my children, too: A mother’s struggle for her sons*. New York, NY: Public Affairs.
- Nielsen, L. (2014). Wozzles: Their role in custody law reform, parenting plans, and family court. *Psychology, Public Policy, and Law*, *20*(2), 164–180. <http://dx.doi.org/10.1037/law0000004>
- Norton, C. L. (2011). Reinventing the wheel: From talk therapy to innovative interventions. In C. L. Norton (Ed.), *Innovative interventions in child and adolescent mental health*. New York, NY: Routledge.
- NOW Foundation. (n.d.) NOW opposes phony parental alienation disorder. Retrieved from <http://www.nowfoundation.org/issues/family/pad.html>
- Parkinson, P., Cashmore, J., & Single, J. (2005). Adolescents’ views on the fairness of parenting and financial arrangements after separation. *Family Court Review*, *43*, 429–444. <http://dx.doi.org/10.1111/j.1744-1617.2005.00044.x>
- People v. Bronson. (2011). The People of the State of New York v. Melinda Bronson, Defendant. Criminal Court, City of New York, New York County. No. 2000QN028427. Decided: April 29, 2011. Retrieved from <http://law.justia.com/cases/new-york/other-courts/2011/2011-21153.html>
- Rand, D. C. (1997a). The spectrum of parental alienation syndrome (part I). *American Journal of Forensic Psychology*, *15*, 23–51.
- Rand, D. C. (1997b). The spectrum of parental alienation syndrome (part II). *American Journal of Forensic Psychology*, *15*, 39–92.
- Rand, D. C. (2011). Parental alienation critics and the politics of science. *American Journal of Family Therapy*, *39*(1), 48–71. <http://dx.doi.org/10.1080/01926187.2010.533085>
- Rand, D. C., & Rand, R. (2006). Factors affecting reconciliation between the child and target parent. In R. S. Gardner, S. R. Sauber, & D. Lorandos (Eds.), *The international handbook of parental alienation syndrome: Conceptual, clinical and legal considerations* (pp. 163–176). Springfield, IL: Charles C. Thomas Publisher.
- Rand, D., Rand, R., & Kopetski, L. (2005). The spectrum of parental alienation syndrome (part III): The Kopteski follow-up study. *American Journal of Forensic Psychology*, *23*, 15–43.
- Richardson, P., & Browleleit, J. (2006). *A kidnapped mind: A mother’s heartbreaking memoir of parental alienation*. Toronto, Canada: Dundurn.
- Roche, P., & Allen, M. (2014). *Broken lives: Broken minds*. London, UK: The Writing Company.
- Rogerson, M. D., Gottlieb, M. C., Handelsman, M. M., Knapp, S., & Younggren, J. (2011). Nonrational processes in ethical decision making. *American Psychologist*, *66*, 614–623. <http://dx.doi.org/10.1037/a0025215>
- Roseby, V., & Johnston, J. R. (1998). Children of Armageddon. Common developmental threats in high-conflict divorcing families. *Child and Adolescent Psychiatric Clinics of North America*, *7*, 295–309, vi.
- Saini, M., Johnston, J. R., Fidler, B. J., & Bala, N. (2012). Empirical studies of alienation. In K. Kuehnle & L. Drozd (Eds.), *Parenting plan evaluations: Applied Research for the family court* (pp. 399–441). New York, NY: Oxford University Press.
- Salem, P. (2009). The emergence of triage in family court services: The beginning of the end for mandatory mediation? *Family Court Review*, *47*, 371–388. <http://dx.doi.org/10.1111/j.1744-1617.2009.01262.x>
- Salem, P., Sandler, I., & Wolchik, S. (2013). Taking stock of parent education in the family courts: Envisioning a public health approach. *Family Court Review*, *51*, 131–148. <http://dx.doi.org/10.1111/fcre.12014>
- Schwartz, S. J., & Finley, G. E. (2009). Mothering, fathering, and divorce: The influence of divorce on reports of and desires for maternal and paternal involvement. *Family Court Review*, *47*, 506–522. <http://dx.doi.org/10.1111/j.1744-1617.2009.01270.x>
- Sigal, A., Sandler, I., Wolchik, S., & Braver, S. (2011). Do parent education programs promote healthy postdivorce parenting? Critical distinctions and a review of the evidence. *Family Court Review*, *49*, 120–139. <http://dx.doi.org/10.1111/j.1744-1617.2010.01357.x>
- Steinberg, L., & Cauffman, E. (1996). Maturity of judgment in adolescence: Psychosocial factors in adolescent decision-making. *Law and Human Behavior*, *20*, 249–272. <http://dx.doi.org/10.1007/BF01499023>
- Steinberg, L., Cauffman, E., Woolard, J., Graham, S., & Banich, M. (2009). Are adolescents less mature than adults?: Minors’ access to abortion, the juvenile death penalty, and the alleged APA “flip-flop.” *American Psychologist*, *64*, 583–594. <http://dx.doi.org/10.1037/a0014763>
- Steinberg, L., & Scott, E. S. (2003). Less guilty by reason of adolescence: Developmental immaturity, diminished responsibility, and the juvenile death penalty. *American Psychologist*, *58*, 1009–1018. <http://dx.doi.org/10.1037/0003-066X.58.12.1009>
- Sullivan, M. J., Ward, P. A., & Deutsch, R. M. (2010). Overcoming Barriers Family Camp: A program for high-conflict divorced families where a child is resisting contact with a parent. *Family Court Review*, *48*, 116–135. <http://dx.doi.org/10.1111/j.1744-1617.2009.01293.x>
- Wallerstein, J. S., & Blakeslee, S. (1989). *Second chances: Men, women, and children a decade after divorce*. New York, NY: Ticknor and Fields.
- Warshak, R. A. (1992). *The custody revolution*. New York, NY: Simon & Shuster.
- Warshak, R. A. (2003a). Bringing sense to parental alienation: A look at the disputes and the evidence. *Family Law Quarterly*, *37*, 273–301.

- Warshak, R. A. (2003b). Payoffs and pitfalls of listening to children. *Family Relations*, 52, 373–384. <http://dx.doi.org/10.1111/j.1741-3729.2003.00373.x>
- Warshak, R. A. (2007). Best interests and the fulfillment of noble aspirations: A call for humbition. *Child Development Perspectives*, 1, 137–139. <http://dx.doi.org/10.1111/j.1750-8606.2007.00031.x>
- Warshak, R. A. (2010a). *Divorce poison: How to protect your family from bad-mouthing and brainwashing*. New York, NY: HarperCollins.
- Warshak, R. A. (2010b). Family Bridges: Using insights from social science to reconnect parents and alienated children. *Family Court Review*, 48, 48–80. <http://dx.doi.org/10.1111/j.1744-1617.2009.01288.x>
- Warshak, R. A. (2010c). Alienating audiences from innovation: The perils of polemics, ideology, and innuendo. *Family Court Review*, 48, 153–163. <http://dx.doi.org/10.1111/j.1744-1617.2009.01295.x>
- Warshak, R. A. (2013). Severe cases of parental alienation. In D. Lorandos, W. Bernet, & S. R. Sauber (Eds.), *Parental alienation: The handbook for mental health and legal professionals* (pp. 125–162). Springfield, IL: Charles C. Thomas Publisher.
- Warshak, R. A., with the endorsement of the researchers and practitioners listed in the Appendix. (2014). Social science and parenting plans for young children: A consensus report. *Psychology, Public Policy, and Law*, 20, 46–67. <http://dx.doi.org/10.1037/law0000005>
- Warshak, R. A. (in press). Parental alienation: What it is; How to manage it. *Journal of the American Academy of Matrimonial Lawyers*.
- Warshak, R. A., & Santrock, J. W. (1983). The impact of divorce in father-custody and mother-custody homes: The child's perspective. In L. A. Kurdek (Ed.), *Children and divorce* (pp. 29–46). San Francisco, CA: Jossey-Bass. <http://dx.doi.org/10.1002/cd.23219831905>
- Wechsler, D. (1991). *Wechsler intelligence scale for children* (3rd ed. manual). San Antonio, TX: Psychological Corporation.
- Weir, K. (2011). High-conflict contact disputes: Evidence of the extreme unreliability of some children's ascertainable wishes and feelings. *Family Court Review*, 49, 788–800. <http://dx.doi.org/10.1111/j.1744-1617.2011.01414.x>
- Weir, K., & Sturge, C. (2006). Clinical advice to courts on children's contact with their parents following parental separation. *Child and Adolescent Mental Health*, 11, 40–46. http://dx.doi.org/10.1111/j.1475-3588.2005.00385_1.x
- Wolpe, J., Brady, J. P., Serber, M., Agras, W. S., & Liberman, R. P. (1973). The current status of systematic desensitization. *The American Journal of Psychiatry*, 130, 961–965. <http://dx.doi.org/10.1176/ajp.130.9.961>
- Zervopoulos, J. A. (2013). *How to examine mental health experts*. Chicago, IL: American Bar Association.

Received March 12, 2015

Revision received May 18, 2015

Accepted May 18, 2015 ■