

Examining Parental Alienation in Child Custody Cases: A Survey of Mental Health and Legal Professionals

JAMES N. BOW

Hawthorn Center, Northville, Michigan

JONATHAN W. GOULD

Private Practice, Charlotte, North Carolina

JAMES R. FLENS

Private Practice, Brandon, Florida

An Internet survey was conducted to examine the views of mental health and legal professionals about parental alienation (PA) in child custody cases. Findings from 448 respondents revealed much awareness about the PA concept and controversies, along with the need for further research in the field. In general, respondents were cautious and conservative/moderate in their view of PA and very reluctant to support the concept of Parental Alienation Syndrome (PAS). Also, they did not view PAS as meeting admissibility standards. Respondents viewed domestic violence (DV) as an important issue to assess, although they did not usually find/suspect DV in such cases. Further, respondents varied according to professional role (evaluators, trial attorneys/judges, and court facilitators) on the relative importance attributed to various assessment factors. Moreover, evaluators' assessment procedures and the frequency of recommended interventions by trial attorneys/judges and evaluators closely paralleled those typically used in child custody cases. Results are compared to past literature in the field, with hopes of clarifying misconceptions.

In 1976, Wallerstein and Kelly identified in their sample of divorcing families a clinical phenomenon that they termed pathological alignment. They

Address correspondence to James N. Bow, Hawthorn Center, 18471 Haggerty Road, Northville, MI 48168. E-mail: bow@michigan.gov and website: www.drjamesbow.com

described a child living with one parent who irrationally rejected the other parent and who refused to visit or have contact with that other parent. Wallerstein and Kelly attributed this behavior to the dynamics of the parent-child separation and later used the term “embittered-chaotic” parent to describe this phenomenon (Wallerstein & Kelly, 1980). Since Wallerstein and Kelly’s identification and description of the “embittered-chaotic” parent, few topics in the child custody field have evoked as much debate as the concept of alienating dynamics.

Many published articles have examined the pattern of one parent’s intentional manipulations of a child’s feelings and beliefs about the other parent and many authors have offered different labels to describe this phenomenon. These labels include, but are not limited to, parental alienation, parental alienation syndrome, and child alienation. The lack of a single definition has contributed to an ongoing debate about the existence, etiology, and characteristics of alienating dynamics and, in the case of specific formulations of alienating behavior, whether there is sufficient empirical evidence to support the use of the term “syndrome” when describing alienating behaviors.

In this article and study, we chose the term “parental alienation” (PA) to represent the variety of models and concepts currently being discussed when describing alienation dynamics. We chose the term “parental alienation” in an effort to underscore our lack of alignment with any specific alienation model or concept and to encourage respondents to consider the broadest possible range of models and concepts in the alienation literature.

The vast majority of authors who have written articles describing parental alienation present theoretical, descriptive approaches to defining the phenomenon rather than results from empirical research. Recently, some empirical studies have been reported (Baker, 2005; Dunne, J. & Hedrick, 1994; Gardner, 2001; Johnston, 2003; Johnston, 2005; Johnston, Walters, & Olesen, 2005a, 2005b, 2005c; Johnston, Lee, Olesen, & Walters, 2005; Rand, Rand, & Kopetski, 2005), but these studies vary widely in quality and the research in this field remains in its infancy. Nevertheless, the belief among judges, attorneys, and mental health professionals about the existence of parental alienation is widely cited in the mental health and legal peer-reviewed literature. It is important to know how the concept has evolved and to understand the development of varying professional views.

HISTORY OF THE CONCEPT

Drawing on his years of clinical experience working with high conflict, post-divorce families, Gardner (1985) described a set of dynamic factors he observed in custody disputes and labeled it Parental Alienation Syndrome (PAS). He viewed PAS as a conscious or unconscious attempt by one parent to behave in a manner that undermines the child or children’s relationship

with the other parent (e.g., target parent). Gardner (1992) claimed that PAS resulted from two main factors: programming or brainwashing of the child by one parent against the other parent and the child's vilification of the target parent. He identified eight key characteristics of PAS: (1) campaign of denigration against the target parent; (2) inconsistent, illogical, weak, or absurd rationalizations given by the child for rejecting the target parent; (3) child's use of phrases, terms, or scenarios that do not reflect the child's experiences or are developmentally inappropriate; (4) child's lack of ambivalence towards either parent; (5) contention that the decision to reject the target parent is the child's; (6) child's unconditional, automatic support of the alienating parent; (7) child's significant lack of guilt over exploitation of the targeted parent; and (8) spread of animosity and danger to include the extended family of the target parent. Although these factors are often cited in the literature, the value ascribed to these factors has not been explored with professionals in the field.

Gardner further argued that PAS was a diagnosable disorder that occurred in mild, moderate, and severe forms (Gardner, 2004b). Gardner initially identified the mother as the parent most often engaged in a systematic attempt to alienate the child, but later he indicated that fathers were as likely as mothers to engage in the alienation process (Gardner, 2002). He also noted that it was inappropriate to diagnose PAS when there was abuse and he provided guidelines for distinguishing between abuse and alienation (Gardner, 1999).

Several other authors have written in support of the concept of PAS, including Cartwright (1993), Dunne and Hedrick (1994), Rand (1997a, 1997b), and Warshak (2000, 2001, 2002). The latter two authors have been the most staunch supporters of PAS and have written widely on the topic. An excellent resource on PAS is *The International Handbook of Parental Alienation Syndrome* (Gardner, Sauber, & Lorandos, 2006); it has chapters written by well-known proponents of PAS.

A group of detractors have criticized the concept of PAS (Bruch, 2001; Emery, 2005; Faller, 1998a, 1998b; Johnston & Kelly, 2004a, 2004b; Kelly & Johnston, 2001; Walker, Brantley, & Rigsbee, 2004a, 2004b; Williams, 2001). Among their criticisms, these scholars have cited PAS focusing almost exclusively on the alienating parent as the etiological agent (Kelly & Johnston, 2001), PAS not meeting syndrome (Myers, 1993) or DSM-IV diagnostic criteria (Emery, 2005; Kelly & Johnston, 2001; Walker et al., 2004a, 2004b; Williams, 2001), PAS being biased against women (Bruch, 2001), PAS being viewed as junk science (Faller, 1998a, 1998b), PAS lacking adequate empirical study (Gould, 2006; Johnston & Kelly, 2004a; Kelly & Johnston, 2001; Walker et al., 2004a, 2004b; Williams, 2001), and the PAS argument being successfully used by abusive fathers in litigation to win custody from mothers who are protecting their children from exposure to risk of maltreatment and/or abuse (APA, 1996).

In response to these criticisms, other professionals have attempted to reformulate the concept of alienation dynamics. Darnall (1998, 1999) used many of Gardner's ideas but avoided the term syndrome, simply referring to the concept as Parental Alienation (PA). Darnall defined PA as any constellation of conscious or unconscious behaviors that might induce a disturbance in the relationship between the child and the target parent. He distinguished PA from PAS, noting that PA focuses on the parent's behavior whereas PAS focuses on the child's behavior.

In a comprehensive reformulation of alienation dynamics, Kelly and Johnston (2001) began by renaming the behavior as child alienation, focusing our attention on the ways in which children can be adversely affected by parental behavior. They also defined alienation dynamics as a multi-dimensional process rather than as a syndrome. Kelly and Johnston outlined a continuum of relationships that children may have with their parents following separation and divorce. At one end of the continuum, children have a positive relationship with both parents and enjoy spending time with them. The next type of relationship along the positive end of the continuum is called affinity, where children have a closer connection with one parent but desire contact with both parents. This affinity may shift over time with changing needs and circumstances. Further along the continuum are allied children, who have an alliance and consistent preference for one parent but do not completely reject the other parent. Despite the children's ambivalence toward the other parent, cruel, rejecting behavior is absent and the children are able to acknowledge some love for this parent.

On the negative end of the continuum, the children reject the target parent and show no ambivalence. This applies to estranged children who have been exposed to family violence, abuse, and/or neglect. Generally, the children's anger and fears are understandable and their estrangement is an adaptive, protective stance, creating distance between themselves and their violent parent. These children commonly refuse to visit the violent parent. The next parent-child relationship on this end of the continuum describes alienated children, who openly express rejection of a parent with no apparent guilt or ambivalence. Their views of the target parent are distorted and exaggeratedly negative. These children appear to be responding to complex and frightening dynamics within the divorce, exacerbated by their own vulnerability.

In the alienation process, Kelly and Johnston (2001) outline some common beliefs exhibited by the aligned parent. First, the aligned parent sees no value to the other parent's presence in the child's life. Second, the aligned parent strongly believes that the rejected parent is dangerous, commonly alleging abuse or neglect on the part of that parent. Third, a belief on the part of the aligned parent that the rejected parent never has, and currently does not, love or care about the child.

The behavior of the rejected parent may contribute to the alienation process as well, according to Kelly and Johnston (2001), such as passivity and withdrawal, counter-rejection of the child, harsh and rigid parenting, a critical and demanding attitude, and diminished empathy for the child may all play a role. Furthermore, Kelly and Johnston (2001) believe that children display specific vulnerabilities to the alienation process, such as age, cognitive capacity, personality and temperament characteristics, sense of abandonment, and the lack of external support.

The debate over PAS and the reformulation of the concept has waged for over 15 years. The present study examined the concept of parental alienation by surveying mental health and legal professionals involved in child custody cases to assess their training in parental alienation, understanding of the concept of alienation, and views of assessing alienation dynamics. Further, child custody evaluators were surveyed about assessment procedures and frequency of recommended interventions; trial attorneys/judges were surveyed about the latter area as well. It is hoped this study will provide valuable information about how professionals view the issue of parental alienation, thereby assisting the court in addressing this important topic.

METHOD

A national Internet search was conducted to locate e-mail addresses of professionals involved in child custody cases, including the following groups: child custody evaluators, family attorneys, family court judges, court-ordered therapists, parenting coordinators/special masters, mediators, researchers, consultants, and advocates. Public access referral lists, a child custody list-serv list, Internet sites, and Yellow Pages search were all used.

After a thorough review of the literature, a comprehensive online survey was developed using SurveyMonkey (www.surveymonkey.com). The survey consisted of 37 questions and took approximately 15 minutes to complete. In an effort to eliminate missing data, respondents were almost always required to answer each question before proceeding to the next question. Respondents were allowed to return to previously answered items to review or revise their responses.

An e-mail message explaining the study was developed with two links: one for participating in the study and another for declining participation; the message was sent to all potential respondents. At the beginning of the survey, the purpose of the study was described and informed consent information was provided, as well as noting that the study was approved by an Institutional Review Board. Potential participants were offered the opportunity to review the findings if they sent a separate e-mail to the first author.

Approximately two and four weeks after the initial e-mailing, another e-mail message/link was sent to those professionals who had not responded. It is also important to note that the SurveyMonkey program only allowed one survey to be completed per e-mail address, which prevented individuals from responding more than once to the same link. Thus, integrity of the sample and data were maintained.

A total of 1,172 professionals received the e-mail and survey link. Five individuals indicated that they did not practice in the child custody/family area, and 61 declined to participate. Of the remaining group of 1,106 potential participants, 512 professionals responded to the survey that resulted in an adjusted return rate of 46%.

A review of the data indicated that 58 respondents completed only about one-fifth of the survey, and stopped responding when the concept of parental alienation was introduced. This group of respondents was therefore eliminated from the analysis. Also, six respondents practiced outside the United States and were excluded from the analysis. Consequently, the final sample was 448.

Of the sample analyzed, the mean age of respondents was 54.52 (S.D. 8.04), with a range of 30 to 78. Females comprised 57.6% of respondents. Almost all respondents were Caucasian (93%), with 2% African American, 2% Hispanic, and 4% other. The following distribution was found for respondents' primary role within child custody cases: 50% child custody evaluators, 18% trial attorneys, 11% mediators (no distinction was made between court-ordered or voluntary mediation), 6% parent coordinators, 5% court-ordered therapists, 3% judges, 3% advocates, 2% consultants, 1% researchers, and 2% other. A comparison of gender and professional role indicated significant differences, $\chi^2(9, N = 448) = 29.36, p < .001$, with females dominating all professional roles except for evaluators (see Table 1).

Regarding professional degrees, 52% held doctoral degrees, 27% law degrees, 23% master's degrees, 1% medical degrees, 1% bachelor's degrees,

TABLE 1 Gender Distribution by Role in Legal System

Primary Role in Legal System	N	% Female	% Male
Advocates	11	72.7	27.3
Trial Attorneys	81	71.6	28.4
Court-ordered therapists	21	76.2	23.8
Child Custody Evaluators	224	45.5	54.5
Judges	13	69.2	30.8
Mediators	48	64.6	35.4
Parent Coordinators/Special Masters	25	68.0	32.0
Researchers	3	100.0	0.0
Consultants	7	57.1	42.9
Other	15	66.7	33.3

$\chi^2(9, N = 448) = 29.36, p < .001$.

and 2% other. Five percent of respondents had dual degrees. The vast majority of respondents (76%) worked in a private practice setting. The next most common setting was the court or affiliated settings (16%), followed by private agencies (4%), public agencies (3%), universities (2%), and other (1%). The majority of respondents worked in the city (59%), followed by a suburban (35%) location. Few respondents (6%) worked in a rural setting. Respondents were from 43 states (35% West, 24% East, 21% Midwest, and 20% South).

In analyzing the results, the total sample ($N = 448$) was utilized, as well as comparing groups according to their primary role in child custody cases: child custody evaluators, trial attorneys/judges, and court facilitators (e.g., parent coordinators/special masters, mediators, and court-ordered therapists). For the latter, statistical analysis involved an analysis of variance (ANOVA) and post hoc Tukey Honest Significant Difference (HSD) test. The Tukey test is a very conservative pairwise comparison test. The Games and Howell's modification of Tukey's HSD was used when the homogeneity of variance assumption was violated. Significant differences ($p < .05$) between these groups will be highlighted in the Results section.

RESULTS

Experience, Training, and Perceptions of Parental Alienation

The mean number of years of professional experience for the sample was 21.88 (S.D. 8.99), with 16.48 years (S.D. 8.42) in the child custody area. A comparison of professional role groups (child custody evaluators, $M = 23.71$; trial attorneys/judges, $M = 19.80$; and court facilitators, $M = 20.29$) revealed a significant difference in the years of professional experience, $F(2, 409) = 9.14$, $p < .001$. Post Hoc analysis using a Tukey honestly significantly difference (Tukey HSD) revealed significant differences between child custody evaluators and attorneys ($p < .001$) and child custody evaluators and court facilitators ($p < .01$).

Among the total sample, 50% of respondents reported having first learned about parental alienation through professional practice, 30% cited learning about parental alienation from books/articles and 11% reported learning about the concept from conferences. Fewer than 2% had an undergraduate or graduate course addressing alienation dynamics.

Ninety-four percent of respondents reported having attended a conference that addressed the topic. The median number of conferences attended was 5, with a mode of 10. Ninety-seven percent of respondents reported having read books/articles on the subject, with a median and mode of 10.

As shown in Table 2, respondents were asked to rate their knowledge and perceptions of parental alienation on a Likert scale (1-none or not at all to 7-extensive or extremely). The total sample of respondents considered

TABLE 2 Perception of Parental Alienation

Area	Rating (%)							Mean Rating	S.D.
	Not at all or none	1	2	3	4	5	6		
Level of knowledge about PA	0	3	10	16	25	25	22	5.23	1.39
Degree of controversy about PA	1	7	8	17	25	23	19	5.03	1.51
Amount of research on PA	6	30	33	22	7	2	1	3.05	1.17
Degree of controversy about PAS	2	2	5	6	17	22	47	5.88	1.42
Amount of research on PAS	16	36	24	15	7	2	1	1.26	1.26
Importance of hypotheses testing	1	1	5	9	16	22	44	5.81	1.41

PA = Parental Alienation, PAS = Dr. Gardner's Parental Alienation Syndrome, N = 448

themselves very knowledgeable about the concept, with almost half of them endorsing a rating of 6 or 7, and 71% endorsing a rating of 5 or higher. The mean rating for the total sample was 5.23. A comparison of mean ratings among the three professional role groups (child custody evaluators $M = 5.46$, trial attorneys/judges $M = 4.83$, and court facilitators $M = 5.15$), revealed significant differences, $F(2, 408) = 7.64$, $p < .01$. A Post Hoc analysis using a Tukey HSD indicated a significant difference between child custody evaluators and trial attorneys/judges ($p < .001$) and court facilitators and trial attorneys/judges ($p < .01$).

Regarding the controversy surrounding the concept of parental alienation, 67% of the total sample of respondents gave a rating of 5 or higher with fewer than 16% giving a rating of 3 or less, which means the respondents view the concept as controversial. When asked how much empirical research has been conducted on parental alienation, 68% of respondents gave a rating of 3 or less, with only a small percentage giving a rating of 5 or higher. The mean ratings among the three professional role groups differed significantly (child custody evaluators $M = 2.83$, attorneys/judges $M = 3.35$, and court facilitators $M = 3.29$), $F(2, 409) = 9.35$, $p < .001$. Post Hoc analysis using a Games and Howell's modification of the Tukey's HSD revealed significant differences between the child custody evaluators and trial attorneys/judges ($p < .001$) and child custody evaluators and court facilitators ($p < .05$). Overall, these findings suggest that respondents, particularly child custody evaluators, view the concept of alienation as under-researched.

When respondents were asked what percentage of child custody cases was parental alienation an issue, the mean reported was 26% (S.D. 22), with a median of 20. Almost all respondents (95%) viewed parental alienation as multi-dimensional. However, 75% of respondents did not view parental

alienation as a syndrome. When asked to rate the degree of controversy created by Dr. Richard Gardner's Parental Alienation Syndrome, 69% of all respondents endorsed a rating of 6 or higher (see Table 2). Moreover, when asked to rate the amount of empirical research conducted on Parental Alienation Syndrome, 68% gave a rating of 3 or less, suggesting a paucity of research in this area. Again, among the three professional role groups, there were significant differences in their ratings in this area (child custody evaluators, $M = 2.46$; trial attorneys/judges, $M = 3.03$; and court facilitators, $M = 2.87$), $F(2, 409) = 8.32$, $P < .001$. Post Hoc analysis using the Games and Howell's modification of the Tukey HSD revealed significant differences between child custody evaluators and trial attorneys/judges ($p < .001$) and court facilitators and trial attorneys ($p < .05$).

When asked if PAS met the Frye Standard of general acceptance, 74% indicated no. An even higher percentage (88%) indicated that PAS did not meet the Daubert admissibility criteria of peer reviewed, testable, general acceptance, and error rate.

Assessment Issues in Parental Alienation

Respondents were asked to rate the importance of hypothesis building and testing in assessing parental alienation. Among the whole sample, the overwhelming majority (82%) of respondents rated it as 5 or higher (see Table 2), which suggests that respondents attribute a great deal of importance to hypothesis building/testing. However, the three professional role groups had significantly different mean ratings (child custody evaluators, $M = 6.18$; court facilitators, $M = 5.77$; trial attorneys/judges, $M = 5.06$), $F(2, 378) = 21.51$, $p < .001$. Post Hoc analysis using the Games and Howell's modification of the Tukey HSD comparisons indicated that child custody evaluators had a significantly higher rating than attorneys ($p < .001$) and court facilitators ($p < .05$), and court facilitators had a significantly higher rating than trial attorneys/judges ($p < .01$). Overall, this suggests that child custody evaluators placed a stronger emphasis on hypothesis building/testing.

Respondents were queried about the severity distribution of parental alienation cases by indicating the percentage of cases falling into the mild, moderate, and severe categories, with the total number of cases equaling 100 percent. The following means were obtained for each category: 47% mild, 32% moderate, and 21% severe.

Concerning the gender distribution of children in the alienation process, respondents indicated a slight majority (53%) for girls. Respondents were also asked to indicate children's most common ages in the parental alienation process, with an age range from 1 through 17. The mean, mode, and median were 10, with a bell curve distribution. Regarding the gender of the alienating parent, respondents most frequently reported mothers in this role (mean = 66%).

Respondents were queried about the percentage of child custody cases with parental alienation allegations that also involve suspected spousal abuse or child abuse. The scores for each category ranged from 0 to 100, with a mean of 35% (median = 25%) for spousal abuse and 29% (median of 20%) for child abuse.

Perception of PAS Factors

Respondents were asked to rate the value of different factors proposed by Dr. Richard Gardner in the assessment process, using a Likert scale (1-none to 7-extreme). Significant differences were found between the major role groups and findings for each group are reported in Table 3. It is important to note that all mean group ratings were of moderate value, that is, scores of approximately 4 or 5.

Respondents across the three groups varied significantly in the degree of emphasis they placed on campaign of denigration by child, $F(2, 378) = 7.04$, $p < .001$; weak/absurd rationalization for denigration by child, $F(2, 378) = 4.42$, $p < .01$; lack of ambivalence on the child's part, $F(2, 378) = 5.75$, $p < .01$; contention that decision to reject target parent is child's, $F(2, 378) = 3.61$, $p < .05$; automatic support of alienating parent by child, $F(2, 378) = 8.31$, $p < .001$; lack of guilt over exploitation of the alienated

TABLE 3 Value of Different Factors in Assessing Parental Alienation

Specific Factor	Evaluators ^a		Attorneys/Judges ^b		Court Facilitators ^c	
	M	S.D.	M	S.D.	M	S.D.
Presence of brainwashing parent	5.41 ^a	1.35	4.92 ^b	1.72	5.42 ^{a,b}	1.42
Campaign of denigration by child	5.14 ^a	1.33	4.46 ^b	1.60	5.12 ^a	1.53
Weak/absurd rationalizations for denigration by child	5.34 ^a	1.35	4.80 ^b	1.69	5.00 ^{a,b}	1.64
Lack of ambivalence on child's part	5.07 ^a	1.49	4.37 ^b	1.78	4.81 ^{a,b}	1.61
Contention that decision to reject target parent is child's	4.62 ^a	1.58	4.01 ^b	2.03	4.44 ^{a,b}	1.76
Automatic support of alienating parent by child	4.88 ^a	1.53	4.03 ^b	1.66	4.65 ^a	1.69
Lack of guilt over exploitation of alienated parent	4.97 ^a	1.55	4.44 ^b	1.73	5.07 ^a	1.53
Presence of borrowed scenarios by child	5.34 ^a	1.28	4.80 ^b	1.56	5.15 ^{a,b}	1.58
Spread of animosity to extended family	5.04 ^a	1.43	4.52 ^b	1.70	4.93 ^{a,b}	1.49

Means having different superscripts differed significantly at $p < .05$ in the Tukey honestly significant difference comparison and if necessary, Games and Howell's modification of the Tukey HSD.

Likert Scale 1 (none) to 7 (extreme).

^aN = 216, ^bN = 79, ^cN = 86.

parent, $F(2, 378) = 3.94, p < .05$; presence of borrowed scenarios by child, $F(2, 378) = 4.27, p < .05$; and spread of animosity to extended family, $F(2, 378) = 3.44, p < .05$.

As shown in Table 3, child custody evaluators almost universally provided the highest mean ratings, followed by court facilitators, and then attorneys/judges. Further, Tukey HSD and Games and Howell's modification of the Tukey HSD comparisons revealed that child custody evaluators differed ($p < .05$) from attorneys/judges on all the above factors, whereas court-ordered facilitators significantly differed from attorneys/judges on only three factors: campaign of denigration by child, automatic support of alienating parent by child, and lack of guilt over exploitation of alienated parent. There were no significant differences between child custody evaluators and court facilitators, which indicates that these two groups rated these factors in a similar manner.

Importance of Assessment Factors

Responses from child custody evaluators, attorneys/judges, and court-ordered facilitators were also compared regarding their appraisal of other assessment factors identified in the literature (see Table 4). Respondents

TABLE 4 Importance of the Factors in Assessing Parental Alienation

Specific Factor	Evaluators ^a		Attorneys & Judges ^b		Court Facilitators ^c	
	M	S.D.	M	S.D.	M	S.D.
Child's Age	5.32 ^a	1.36	4.68 ^b	1.52	5.38 ^a	1.27
Child's Cognition	5.31	1.29	4.95	1.54	5.38	1.29
Child's Development Level	5.45	1.23	5.08	1.47	5.49	1.22
Child's Relationship with each parent	6.30 ^a	0.79	5.85 ^b	1.44	6.14 ^{a,b}	1.14
Child/Adolescent Rebellion	5.46 ^a	1.12	4.86 ^b	1.48	5.40 ^a	1.22
Psychological Vulnerability of Child	5.91 ^a	0.96	5.44 ^b	1.47	5.90 ^{a,b}	1.01
Role Reversals	5.10 ^a	1.37	4.10 ^b	1.78	5.07 ^a	1.42
Dynamics Between Siblings	4.69 ^a	1.34	3.76 ^b	1.48	4.81 ^a	1.32
Remarriage Issues	4.91 ^a	1.36	4.24 ^b	1.41	5.02 ^a	1.33
Adversarial Nature of Divorce	5.85 ^a	1.10	5.18 ^b	1.66	5.93 ^a	1.22
Domestic Violence	5.76	1.27	5.35	1.72	5.59	1.39
Parental Substance Abuse	5.19	1.54	4.96	1.66	5.28	1.48
Parental Abandonment/Neglect	5.74	1.31	5.44	1.41	5.59	1.46
Attachment Issues	5.77 ^a	1.17	5.32 ^b	1.30	5.52 ^{a,b}	1.35
Parenting Skills	5.52 ^a	1.29	5.01 ^b	1.53	5.43 ^{a,b}	1.33
Pathological Alignment	6.21 ^a	0.83	5.37 ^b	1.57	5.95 ^a	1.17
Separation Anxiety Issues	5.28 ^a	1.31	4.66 ^b	1.59	5.37 ^a	1.25
Child Abuse	5.83	1.37	5.69	1.68	5.69	1.47

Means having different superscripts differed significantly at $p < .05$ in the Tukey honestly significant difference comparison and if necessary, Games and Howell's modification of the Tukey HSD. Likert Scale 1 (none) to 7 (extreme). ^aN = 216, ^bN = 79, ^cN = 86

were asked to rate the importance of each of these factors in the assessment process on a Likert scale (1-none to 7-extreme). The groupings varied significantly in their valuation of the following factors: child's age, $F(2, 378) = 7.20$, $p < .001$; child's relationship with each parent, $F(2, 378) = 5.43$, $p < .01$; child/adolescent rebellion, $F(2,378) = 7.15$, $p < .001$; psychological vulnerability of child, $F(2, 378) = 5.57$, $p < .01$; role reversals, $F(2, 378) = 14.12$, $p < .001$; dynamics between siblings, $F(2, 378) = 15.84$, $p < .001$; remarriage issues, $F(2, 378) = 8.57$, $p < .001$; adversarial nature of divorce, $F(2, 378) = 9.61$, $p < .001$; attachment issues, $F(2, 378) = 4.28$, $p < .01$; parenting skills, $F(2, 378) = 4.10$, $p < .05$; pathological alignment, $F(2, 378) = 17.17$, $p < .001$; and separation anxiety, $F(2, 378) = 7.30$, $p < .001$.

As shown in Table 4, further analysis of these factors using the Tukey HSD comparisons and Games and Howell's modification of the Tukey HSD revealed that child custody evaluators and court-ordered facilitators offered similar ratings, with no significant differences. However, child custody evaluators gave significantly higher mean ratings than attorneys/judges on all the aforementioned factors. Court-ordered facilitators provided significantly higher mean ratings than attorneys/judges on the aforementioned factors as well, with the exception of the child's relationship with each parent, psychological vulnerability of child, attachment issues, and parenting skills.

Interestingly, parental abandonment/neglect, child abuse, and domestic violence were all rated moderately high with non-significant differences between the groups, indicating that respondents universally considered these factors to be very important in the assessment process. Non-significant differences were also found between the groups on the following factors: child's cognition, child's developmental level, and parental substance abuse.

Evaluators' Ratings of Usefulness of Assessment Procedures

Table 5 shows the mean ratings given by child custody evaluators for the usefulness of different assessment procedures, using a Likert scale (1-useless to 7-extremely useful). An interview with the alleged alienated parent received the highest mean rating, followed by an interview with the alleged alienating parent and interview with the child(ren). This was followed by parent-child observations and collateral contacts. All of these procedures were accorded mean ratings of approximately 6 or higher. The lowest mean ratings were obtained for the usefulness of testing and conjoint parent interviews.

Recommended Interventions for Parental Alienation by Evaluators and Attorneys/Judges

Table 6 shows the mean ratings using a Likert scale (1-never to 7-always) of child custody evaluators and attorneys/judges regarding the frequency

TABLE 5 Evaluators' Rating of the Usefulness of Different Assessment Procedures

Procedure	Mean	S.D.
Interview with alleged alienated parent	6.72	0.65
Interview with alleged alienating parent	6.75	0.58
Interview with child(ren)	6.66	0.74
Observation of child and alleged alienated parent	6.64	0.77
Observation of child and alleged alienating parent	6.56	0.92
Collateral contacts	6.01	1.22
Review of records	5.97	1.20
Interview with spouses	5.59	1.41
Interview with live-together-partners	5.47	1.43
Interviews with significant others	5.31	1.45
Testing of alleged alienating parent	5.17	1.63
Testing of alleged alienated parent	5.14	1.63
Conjoint session with both parents	4.58	1.83
Testing of child(ren)	4.40	1.78

Likert Scale 1 (useless) to 7 (extremely useful). $N = 214-216$.

of recommended interventions. Respondents from both groups gave similar ratings, except Sanctions differed significantly, $F(1,291) = 23.20$, $p < .001$, with trial attorneys/judges significantly favoring this intervention over evaluators. Nevertheless, both groups rarely recommended it. Interventions recommended most often by both groups included individual therapy for the child and parents, followed by parent education. In addition to the

TABLE 6 Ratings of Frequency of Recommendations in Parental Alienation Cases for Child Custody Evaluators and Trial Attorneys/Judges

Significance Intervention	Evaluators ^a		Attorneys & Judges ^b		Level
	Mean	S.D.	Mean	S.D.	
Individual therapy with child	5.66	1.46	5.84	1.70	
Individual therapy for alienating parent	5.63	1.43	5.89	1.63	
Individual therapy for alienated parent	5.41	1.38	5.66	1.66	
Parent Education	5.31	1.60	5.59	1.67	
Parenting Coordinator/Special Master	4.87	1.89	4.38	2.20	
Use of logbook/e-mail for Communication	4.74	1.66	5.09	1.81	
Family therapy	4.42	1.90	4.61	1.90	
Supervised Visits	4.15	1.40	4.23	1.55	
Guardian Ad Litem	4.15	2.05	4.20	2.32	
Visit Exchange Monitor	4.08	1.66	3.97	1.68	
Reducing Alienator's Access	4.02	1.47	4.15	1.81	
Domestic Violence Classes	3.50	1.44	3.37	1.70	
Change of Custody	3.37	1.45	3.77	1.81	
Conjoint therapy with both parents	3.24	1.88	3.46	1.93	
Mediation	3.15	1.72	3.18	1.82	
Sanctions, such as fines, incarceration, etc.	2.26	1.56	3.30	1.86	$p < .001$
Boarding School	1.62	0.97	1.66	1.22	
Residential/hospital treatment	1.56	0.77	1.63	1.05	

Likert Scale 1 (never) to 7 (always). ^a $N = 214$, ^b $N = 79$.

aforementioned Sanctions, other rarely recommended interventions included boarding school and residential placement/hospitalization.

DISCUSSION

This study was conducted to examine the views of mental health and legal professionals regarding parental alienation in child custody cases. The final sample of 448 respondents viewed themselves as moderately to extremely knowledgeable about parental alienation. However, it is important to remember that this is a self-rating by respondents, and may over- or under-estimate their actual knowledge about the concept. Nevertheless, almost all respondents reported having attended numerous conferences and having read many books/articles on the topic of parental alienation.

The vast majority of respondents indicated their awareness of the controversies surrounding the term “parental alienation” and perceived a lack of empirical research to support the concept. Nevertheless, they acknowledged the existence of alienation dynamics within the child custody field, and almost all viewed it as a multi-dimensional construct.

Respondents did not view parental alienation as a “syndrome” as defined by Dr. Richard Gardner. Further, they overwhelmingly did not view PAS as meeting the Frye Standard of general acceptance, and almost all respondents felt that that PAS failed to meet the Daubert criteria. Consequently, these professionals had serious questions about the admissibility of PAS in a court of law, which supports the view of Williams (2001) and Emery (2005). Despite this, Gardner (2002) claimed that PAS has been recognized in 51 court cases and Warshak (2001) argues that PAS meets both Frye and Daubert criteria.

On average, respondents reported that one-quarter of their cases involved concerns about parental alienation, with approximately half of those cases being classified as mild alienation. Respondents reported alienation most frequently with ten-year-old children, with a bell-shaped age distribution. This finding is commensurate with Johnston and Roseby's (1997) work with high-conflict families in which they reported that children between the ages 9–12 were found to be particularly vulnerable to being alienated by one parent against the other parent.

Respondents found parental alienation to be slightly more common for girls than for boys, and also reported the mother as more likely to be the alienating parent (65%). This is interesting in light of Gardner's original hypothesis in the 1980's in which he opined that 85–90% of his cases involved the mother as the alienating parent. Gardner later (mid-1990s) modified his view, citing the percentage as approximately 50% (Gardner, 2002).

Contrary to Walker et al.'s (2004a) contention, respondents reported that child abuse or spousal abuse was not often suspected in cases involving allegations of parental alienation. It is also important to note that

in the assessment process, respondents accorded some of the highest mean ratings to the following factors: child abuse, domestic violence, and abandonment/neglect. Moreover, the mean ratings of child custody evaluators, attorneys/judges, and court-ordered facilitators were comparable, challenging the view that child custody evaluators overlook or minimize these issues (Walker et al., 2004a; Walker & Edwall, 1987; Bancroft & Silverman, 2002).

Among the factors identified by Gardner (1985, 1999, 2004a, 2004b) as critical in the assessment process, we found that different professional role groups (child custody evaluators, court facilitators, and trial attorneys/judges) placed different values on alienation factors. In general, child custody evaluators endorsed the highest mean ratings on the factors identified by Gardner, followed by court facilitators and trial attorneys/judges, with numerous significant differences between evaluators and trial attorneys/judges. However, it is important to note that all mean ratings fell within the moderate range. This is noteworthy because it demonstrates that they did not discount these factors despite their view of PAS as highly controversial.

Child custody evaluators and court facilitators rated numerous assessment factors as significantly more important than did the trial attorneys/judges, including child-related factors (age, rebellion, role reversal), family issues (adversarial nature of divorce, remarriage issues, dynamics between siblings), and attachment/alignment issues. The significantly lower ratings given by trial attorneys/judges suggest they consider these factors less important in their deliberation about parental alienation, although the importance of these factors has been clearly outlined in the literature (Kelly and Johnston, 2001; Johnston and Kelly, 2004).

The findings in this study concerning child custody evaluators' ratings of the usefulness of specific assessment procedures closely parallel findings of previous child custody research (Bow, 2006). Custody evaluators in this study supported the use of conventional forensic methodology (Bow, 2006; Gould, 2006; Gould & Martindale, 2007) that included parent interviews, child interviews, parent-child observations, review of records, and collateral contacts were rated as most useful, with all earning moderately high ratings. Furthermore, this study supports the importance of hypothesis testing and collecting data from numerous sources as recommended by the American Psychological Association's Guidelines for Child Custody Evaluations in Divorce Proceedings (APA, 1994) and in the forensic (Heilbrun, 2001) and child custody literature (Bow, 2006; Gould, 2006; Gould & Martindale, 2007).

It is also interesting that the type and frequency of recommended interventions made by child custody evaluators and trial attorneys/judges closely parallel past child custody research (Bow, 2006). This finding is surprising considering the complexity of these cases and the need for specialized and/or innovative interventions as outlined by Johnston et al. (2001), along with the need for the court to be more firm and assertive at times.

In terms of limitations of the study, it is important to realize that respondents as a group had many years of experience and the vast majority of them worked in a private practice setting. Therefore, it may be difficult to generalize the findings beyond this sample group. Also, some of the questions involved estimating percentages, which may not reflect the actual figures in practice. In addition, general intervention modalities were investigated rather than specific techniques for each modality. The latter is an important area for further research. Furthermore, it would have been interesting to explore the degree to which attorneys use parental alienation as a strategic ploy rather than a bonfire issue. Although difficult to assess, it would be an interesting area to research.

CONCLUSIONS

It is hoped the findings from this study will help clarify issues regarding mental health and legal professionals' views of parental alienation. As a group, respondents appeared knowledgeable about the concept and controversies, and their answers reflected a conservative/moderate and practical perspective rather than a radical position. They expressed serious concerns about PAS and did not view it as meeting admissibility standards. However, they saw moderate value in Gardner's alienation factors in the assessment process. Respondents seemed attuned to assessing for child abuse and domestic violence, but thought the prevalence of such issues in parental alienation cases was significantly lower than proposed by Walker and colleagues. Findings also indicated that procedures used by child custody evaluators in assessing parental alienation were similar to those used in typical child custody evaluations. Moreover, the frequency of recommended interventions was similar for child custody evaluators and trial attorneys/judges, except for sanctions, which the latter group favored. Lastly, respondents noted the need for further empirical research. Interestingly, regardless of the views held by these professionals, there has been a proliferation of some impassioned debate in this area over the last fifteen years. It is hoped this article will stimulate further discussion, clarify some misconceptions, and promote research in the parental alienation field.

REFERENCES

- American Psychological Association. (1994). Guidelines for child custody evaluations in divorce proceedings. *American Psychologist*, 49, 677-680.
- American Psychological Association. (1996). *Report of the APA Presidential Task Force on Violence and Family*. Washington, DC: Author.
- Baker, A. J. L. (2005). The long-term effects of parental alienation on adult children: A qualitative study. *American Journal of Family Therapy*, 33, 289-302.

- Bancroft, L., & Silverman, J. G. (2002). *The batterer as parent: Addressing the impact of domestic violence on family dynamics*. Thousand Oaks, CA: Sage.
- Bow, J. N., Gould, J. W., Flens, J., & Greenhut, D. (2006). Testing in child custody evaluations— Selection, usage, and Daubert admissibility: A survey of psychologists. *Journal of Forensic Psychology Practice, 6*(2), 17–38.
- Bow, J. N. (2006). Review of empirical research on child custody practice. *Journal of Child Custody, 3*(1), 23–50.
- Bruch, C. S. (2001). Parental Alienation Syndrome and Parental Alienation: Getting it wrong in child custody cases. *Family Law Quarterly, 35* (3), 527–552.
- Cartwright, G. F. (1993). Expanding the parameters of Parental Alienation Syndrome. *The American Journal of Family Therapy, 21*, 205–215.
- Committee on Ethical Guidelines for Forensic Psychologists. (1991). Specialty guidelines for forensic psychologists. *Law and Human Behavior, 15*, 655–665.
- Darnall, D. (1998). *Divorce causalities: Protecting your children from parental alienation*. Dallas, Texas: Taylor Publishing.
- Darnall, D. (1999). Parental alienation: Not in the best interests of the children. *The North Dakota Law Review, 75*, 325–327.
- Drozd, L. M., & Olesen, N. W. (2004). Is it abuse, alienation, and/or estrangement? A decision tree. *Journal of Child Custody, 1*, 65–106.
- Dunne, J., & Hedrick, M. (1994). The parental alienation syndrome: An analysis of sixteen elected cases. *Journal of Divorce and Remarriage, 21*, 21–37.
- Emery, R. E. (2005). Parental Alienation Syndrome: Proponents bear the burden of proof. *Family Court Review, 43*, 8–13.
- Faller, K. C. (1998a). The Parental Alienation Syndrome: What is it and what data support it?: Reply. *Child Maltreatment: Journal of the American Professional Society in the Abuse of Children, 3* (4), 312–313.
- Faller, K. C. (1998b). The Parental Alienation Syndrome: What is it and what data support it? *Child Maltreatment: Journal of the American Professional Society on the Abuse of Children, 3* (2), 100–115.
- Gardner, R. A. (1985). Recent trends in divorce and custody litigation. *Academy Forum (A Publication of the American Academy of Psychoanalysis), 29*, 3–7.
- Gardner, R. A. (1998). Recommendations for dealing with parents who induce parental alienation syndrome in their children. *Journal of Divorce and Remarriage, 28*, 1–21.
- Gardner, R. A. (1992). *The parental alienation syndrome: A guide for mental health and legal professionals*. Creskill, NJ: Creative Therapeutics.
- Gardner, R. A. (1999). Differentiating between Parental Alienation Syndrome and bona fide abuse-neglect. *American Journal of Family Therapy, 27*, 97–107.
- 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). Parental alienation syndrome vs. parental alienation: Which diagnosis should evaluators use in child-custody disputes? *The American Journal of Family Therapy, 30*, 93–115.

- Gardner, R. A. (2004a). Commentary on Kelly and Johnston's "The Alienated Child: A reformulation of Parental Alienation Syndrome." *Family Court Review*, 42, 611–621.
- Gardner, R. A. (2004b). The three levels of parental alienation syndrome: Differential diagnosis and management. *American Journal of Forensic Psychiatry*, 25(3), 41–76.
- Gardner, R., Suber, R. S., & Lorandos, D. (Eds.) (2006). *The international handbook of parental alienation syndrome: Conceptual, clinical, and legal considerations*. Springfield, IL: Charles Thomas.
- Gould, J. W. (2006). *Conducting scientifically crafted child custody evaluations*. 2nd ed. Sarasota, Florida: Professional Resource Press.
- Gould, J.W., & Martindale, D.A. (2007). *The art and science of child custody evaluations*. New York: Guilford Press.
- Heilbrun, K. (2001). *Principles of forensic mental health assessment*. New York: Kluwer Academic.
- Johnston, J. R. (2005). Children of divorce who reject a parent and refuse visitation: Recent research and social policy implications for the alienated child. *Family Law Quarterly*, 38, 757–775.
- Johnston, J. R. (2003). Parental alignments and rejection: An empirical study of alienation in children of divorce. *Journal of the American Academy of Psychiatry and the Law*, 31, 158–170.
- Johnston, J. R., & Roseby, V. (1997). *In the name of the child: A developmental approach to understanding and helping children of conflicted and violent divorce*. New York: Free Press.
- Johnston, J. R., & Kelly, J. B. (2004a). Rejoinder to Gardner's "Commentary on Kelly and Johnston's "The Alienated Child; A reformulation of Parental Alienation Syndrome." *Family Court Review*, 42, 622–628.
- Johnston, J. R., & Kelly, J.B. (2004b). Commentary on Walker, Brantley, and Rigsbee's (2004) "A critical analysis of Parental Alienation Syndrome and its admissibility in the family court." *Journal of Child Custody*, 1, 77–89.
- Johnston, J. R., Lee, S., Olesen, N. W., & Walters, M. G. (2005). Allegations and substantiations of abuse in custody disputing families. *Family Court Review*, 43, 283–294.
- Johnston, J. R., Walters, M. G., & Olesen, N. W. (2005a). Is it alienating parenting, role reversal or child abuse? An empirical study of children's rejection of a parent in child custody disputes. *Journal of Emotional Abuse*, 5, 191–218.
- Johnston, J. R., Walters, M. G., & Olesen, N. W. (2005b). The psychological functioning of alienated children in custody disputes.: An exploratory study. *American Journal of Forensic Psychology*, 39, 39–64.
- Johnston, J. R., Walters, M., & Olesen, N. W. (2005c). Clinical ratings of parenting capacity and Rorschach protocols of custody-disputing parents: An exploratory study. *Journal of Child Custody*, 2, 159–178.
- Johnston, J. R., Walters, M., & Friedlander, S. (2001). Therapeutic work with alienated children and their families. *Family Court Review*, 39, 316–333.
- Kelly, J. B., & Johnston, J. R. (2001). The alienated child: A reformulation of Parental Alienation Syndrome. *Family Court Review*, 39, 249–266.

- Myers, J. E. B. (1993). Expert testimony describing psychological syndromes. *Pacific Law Journal*, 24, 1449–1464.
- Rand, D. C. (1997a). The spectrum of parental alienation syndrome (Part I). *American Journal of Forensic Psychology*, 15(3), 23–52.
- Rand, D. C. (1997b). The spectrum of parental alienation syndrome (Part II). *American Journal of Forensic Psychology*, 15(4), 39–92.
- Rand, D. C., Rand, R., & Kopetski, L. (2005). The spectrum of parental alienation syndrome Part III: The Kopetski follow-up study. *American Journal of Forensic Psychology*, 23, 15–34.
- Stahl, P. (1999). *Complex issues in child custody evaluations*. Thousand Oaks, CA: Sage.
- Sullivan, M. J., & Kelly, J. B. (2001). Legal and psychological management of cases with an alienated child. *Family Court Review*, 39(2), 299–315.
- Waldron, K. H., & Joanis, D. E. (1996). Understanding and collaboratively treating parental alienation syndrome. *American Journal of Family Law*, 10, 121–133.
- Walker, L. E., & Edwall, G. E. (1987). Domestic violence and determination of visitation and custody in divorce. In D. J. Sonkin (Ed.), *Domestic violence on trial: Psychological and legal dimensions of family violence* (pp. 127–152). New York: Springer.
- Walker, L. E., Brantley, K. L., & Rigsbee, J. A. (2004a). A critical analysis of Parental Alienation Syndrome and its admissibility in the family court. *Journal of Child Custody*, 1, 47–74.
- Walker, L. E., Brantley, K. L., & Rigsbee, J. A. (2004b). Response to Johnston and Kelly Critique of PAS article. *Journal of Child Custody*, 1, 91–97.
- Wallerstein, J. S., & Kelly, J. B. (1976). The effects of parental divorce: Experiences of the child in later latency. *American Journal of Orthopsychiatry*, 46, 256–269.
- Wallerstein, J. S., & Kelly, J. B. (1980). *Surviving the breakup: How children and parents cope with divorce*. New York: Basic Books.
- Warshak, R. A. (2000). Remarriage as a trigger of Parental Alienation Syndrome. *American Journal of Family Therapy*, 28(3), 229–241.
- Warshak, R. A. (2001). Current controversies regarding Parental Alienation Syndrome. *American Journal of Forensic Psychology*, 19(3), 29–59.
- Warshak, R. A. (2002). Misdiagnosis of Parental Alienation Syndrome. *American Journal of Forensic Psychology*, 19(3), 29–59.
- Warshak, R. A. (2003). “Bringing sense to Parental Alienation: A look at the disputes and the evidence.” *Family Law Quarterly*, 37(2), 273 – 301.
- Williams, R. J. (2001). Should judges close the gate on PAS and PA? *Family Court Review*, 39, 267–281.