

The Scientific Case Against Parental Alienation: A Critical Review

Keith Robert Head

LMSW, Master's in Social Work (MSW), West Texas A&M University, USA; Master of Business Administration (MBA),
Bottega University, USA

Corresponding Author: khead4@alumni.uwo.ca

ORCID

<https://orcid.org/0009-0004-0512-8166>



www.ijrah.com || Vol. 6 No. 1 (2026): January Issue

Date of Submission: 27-12-2025

Date of Acceptance: 03-01-2026

Date of Publication: 12-01-2026

ABSTRACT

Parental alienation syndrome (PAS) and its reformulation as parental alienation (PA) have gained traction in family courts despite persistent scientific controversy. This review synthesizes peer-reviewed research across psychology, law, and family studies from 1985 to 2025 to examine the empirical foundations and professional acceptance of PA/PAS. The analysis suggests that Gardner's original formulation and subsequent iterations fail to meet basic validity requirements for psychological constructs and are unsupported by research. Major medical, psychiatric, and psychological professional organizations have rejected PA/PAS as a legitimate concept. Empirical data shows a troubling correlation between PA allegations and documented domestic violence, with such claims frequently functioning as litigation strategies that redirect attention from abuse allegations. When courts credit PA claims, children face measurable harms including placement with abusive parents and subjection to unvalidated reunification interventions. These findings suggest that PA allegations often represent a form of post-separation coercive control and call for heightened judicial skepticism when such claims arise alongside safety concerns.

Keywords- parental alienation syndrome, parental alienation, child custody, pseudoscience, estrangement, domestic violence, coercive control, family court, child abuse allegations, intimate partner violence, child welfare.

I. INTRODUCTION

Parental alienation syndrome (PAS), colloquially known as parental alienation (PA), has become a widely recognized term in popular culture through books, films, and mainstream media, and is increasingly being invoked in family courts worldwide. This concept, originally introduced by Richard Gardner in the 1980s, describes a pattern in which one parent allegedly manipulates a child to unjustifiably reject the other parent following separation or divorce (Gardner, 1987). Despite lacking credible empirical support, the concept has seen rapid adoption in family courts throughout the 1990s and 2000s, influencing custody determinations and shaping how courts treat strained parent-child relationships. Proponents over time have

reformulated the construct as "parental alienation" (PA) in attempts to distance it from Gardner's more controversial claims while retaining its core theoretical assumptions. This widespread adoption masks a problematic reality: from its inception, the PAS construct has been mired in controversy, skepticism, and ethical concerns.

This article critically examines the scientific foundations and evolution of PA/PAS by synthesizing peer-reviewed literature across psychology, law, and family studies. Four central arguments structure this analysis. First, Gardner's original formulation and subsequent iterations fail to meet fundamental validity requirements. Second, major professional organizations have rejected PA/PAS. Third, the behaviors attributed to "alienation" are better explained by alternative

frameworks, particularly estrangement resulting from children's legitimate responses to parental abuse, neglect, or deficient parenting. Finally, when viewed within the context of domestic violence research, PA allegations often function as a form of post-separation coercive control, allowing abusive parents to weaponize family courts against protective parents and their children.

II. METHODOLOGY

This paper employed a literature review supplemented by primary source analysis to examine parental alienation syndrome (PAS) and parental alienation (PA) from their emergence in the 1980s through present applications. A comprehensive search was conducted across PubMed, PsycINFO, JSTOR, Academic Search Complete, Google Scholar, and ScienceDirect, covering publications from 1985 to 2025, using search terms including but not limited to "parental alienation," "parental alienation syndrome," "Gardner," "divorce-related estrangement," and "pathogenic parenting." Inclusion criteria prioritized peer-reviewed empirical studies, theoretical analyses, clinical commentaries, and professional organization statements addressing the concept's origins, diagnostic validity, empirical support, and scientific critiques. Studies presenting only anecdotal cases without critical analysis or those failing to engage questions of validity and evidentiary standards were excluded. The selection process involved relevance screening, full-text assessment for methodological quality, and thematic analysis to identify patterns in the concept's evolution and contested status across professional communities. Primary sources included Gardner's original publications introducing PAS, professional association statements, archived clinical debates, and contemporaneous critiques from child development researchers; analyzing how parental alienation evolved from a clinical hypothesis to a widely invoked construct, despite scientific controversy.

III. BACKGROUND

Richard A Gardner, an unpaid, part-time clinical professor at Columbia University, introduced Parental Alienation Syndrome in the early 1980s as a clinical phenomenon emerging within contested child custody proceedings (Laviates, 2003). Gardner, who generated the majority of his income serving as a paid forensic expert witness in contested custody cases, defined PAS as a disturbance in which one parent systematically undermines the child's relationship with the other parent through deliberate programming, resulting in the child's unjustified rejection of that parent. PAS was positioned as distinct from cases involving legitimate estrangement based on actual parental misconduct or abuse. Gardner's diagnostic framework suggested eight observable manifestations in affected children: a persistent campaign of denigration against the targeted parent, weak or

frivolous rationalizations for this deprecation, lack of ambivalence in expressing entirely negative views of one parent and entirely positive views of the other, the "independent thinker" phenomenon in which the child insists the rejection originated independently, automatic support of the alienating parent in any conflict, absence of guilt regarding cruel treatment of the targeted parent, use of borrowed scenarios and terminology derived from the alienating parent, and generalization of hostility to the targeted parent's extended family and social network.

These manifestations followed a three-tier classification system based on severity, ranging from mild cases where some programming occurs but functional contact continues, to moderate cases demonstrating more intensive indoctrination with increasingly problematic visitation, to severe manifestations involving what Gardner characterized as intensive brainwashing that produces extreme agitation or paranoid reactions in the child's encounters with the targeted parent. In this model, the alienating parent employs specific tactics, including systematic disparagement of the other parent, deliberate restriction of contact opportunities, fostering perceptions of danger or threat, compelling the child to choose between parents, and inducing guilt when the child expresses positive feelings toward the targeted parent. Gardner argued that these behaviors operated synergistically to disrupt the parent-child bond (Gardner, 1987, 1992, 1999, 2001).

IV. SCIENTIFIC LEGITIMACY

Syndromes, like all medical concepts and research, require rigorous peer-review and professional acceptance, especially when being proposed and published. The prevailing consensus among experts is that PAS and its subsequent iterations lack evidential support. Gardner formulated PAS based on his subjective, anecdotal clinical observations from his practice rather than peer-reviewed scientific studies. Gardner self-published his work through his own company, Creative Therapeutics, bypassing the peer-review process entirely (Gardner, 1999). This self-publication strategy meant that Gardner's initial formulation of PAS was disseminated directly to legal and mental health professionals without undergoing the peer-review process that characterizes standard scientific publication. By publishing through Creative Therapeutics, which appeared to be an independent publisher but was actually his own company, Gardner avoided peer-review while creating an appearance of legitimate third-party validation. The bypass of peer-review drew substantial criticism from professional organizations and researchers who argued that PAS lacked the scientific foundation necessary for a recognized syndrome (Bruch, 2001; Houchin et al., 2012). While acknowledging that some of his early work was valuable, it should be noted that Gardner published much of his work through his own press or in non-scientific journals, circumventing traditional scientific peer-review.

Scholarly reviews of the theory have repeatedly identified systematic failures in PA/PAS to meet basic criteria for valid psychological constructs (Milchman, 2019). Gardner himself acknowledged that his research relied primarily on his own clinical observations rather than controlled scientific experimentation, and at the time of his 2004 publication, only one study employing statistical analysis existed on PAS, which was his own work (Mooney, 2024). Subsequent attempts by leading researchers in the field attempting to reformulate PAS refuted Gardner, concluding that his focus on the alienating parent as the primary cause of children's negative attitudes is "overly simplistic and not supported by findings from recent empirical research" (Johnston & Kelly, 2004). Problems with PAS are further echoed throughout the research, with some research finding as many as 21 distinct scientific problems with the theory (Willis & O'Donohue, 2018). While clinicians often see "alienation", there is no objective evidence to date whether observed breakdowns in parent-child relationships stem from an alienation disorder or constitute a child's reasonable reaction to abusive or neglectful parenting (Meier, 2009). The sole empirical study attempting to investigate PAS (inter-rater reliability) suffered from severe attrition, with just 14 of 58 participants completing the research, suggesting significant pushback from participants, and rendering its findings inadequate for establishing reliability (Rueda, 2004). No controlled studies have supported the theory, and Gardner's claims have not been independently replicated. In fact, the body of empirical research that does exist appears to contradict rather than support the concept's core claims. When alienation is alleged, no reliable method has been developed to distinguish parental alienation from justified estrangement in cases involving actual abuse or neglect. It's worth noting that the limited research on PAS has been conducted by PA advocates with vested interests in validating the construct.

Perhaps most significant, is the consistent refusal of major medical, psychiatric, and psychological professional organizations to recognize PAS as a legitimate theory or diagnostic criterion. The American Psychiatric Association has consistently declined to include PAS in any edition of the Diagnostic and Statistical Manual of Mental Disorders due to insufficient empirical evidence supporting it as a distinct mental disorder. The American Psychological Association, through its 1996 Presidential Task Force on Violence and the Family, has noted the lack of data supporting PAS and raised concerns about its use (American Psychological Association, 1996). The American Medical Association does not recognize PAS as a valid medical syndrome. The World Health Organization explicitly removed parental alienation from the ICD-11 classification index in 2020, stating that it is "not a health care term" and that "there are no evidence-based health care interventions specifically for parental alienation" (World Health Organization, 2020). The American Professional Society on the Abuse

of Children (APSAC) has stated that it is "negligent, even reckless" for any professional to characterize their publications as endorsing or lending credence to a diagnosis of parental alienation (APSAC, 2023). The National Council of Juvenile and Family Court Judges has formally stated that "the theory positing the existence of 'PAS' has been discredited by the scientific community" (NCJFCJ, 2021). Internationally, the UN Human Rights Council Special Rapporteur on violence against women has characterized parental alienation as a "pseudo-concept" lacking empirical validity (Alsalem, 2023).

V. REJECTION AS ESTRANGEMENT

While PAS provides a possible explanation for a breach in relationship between a child and a parent, it ignores evidence that children may have valid reasons for rejecting a parent. A substantial body of research shows that when children resist or refuse contact with a parent following separation, their behavior frequently reflects legitimate estrangement caused by that parent's own conduct rather than manipulation by the other parent. A landmark 2001 review criticized PAS while recognizing that alienating behavior can occur. It argued that Gardner's emphasis on the alienating parent as the main cause of children's rejection was overly simplistic and unsupported by recent research. Instead, it found that child rejection stems from multiple factors, including high-conflict custody battles and poor parenting by the rejected parent (Kelly & Johnston, 2001). Follow up studies also found after studying over 200 children in custody disputes, that "rejected parents, whether father or mother, appear to be the more influential architect of their own alienation, in that deficits in their parenting capacity are more consistently and most strongly linked to their rejection by the child" (Johnston, 2003). Further studies examining parental denigration also document that many parents engage in disparaging behaviors toward the other parent, yet few of their children actually become "alienated," and some children reject a parent even when no campaign of denigration exists. (Rowen & Emery, 2014).

Across the literature, "Realistic estrangement" emerges as a far more compelling explanation compared to PAS. This occurs when a child's rejection is based on actual negative experiences with the rejected parent. PA theory has been critiqued for ignoring children's agency and dismissing their valid experiences and reasons for parental estrangement. Recent research in estrangement theory has proposed "resist/refuse dynamics" recognizing multiple factors influencing contact refusal, including child developmental factors, parenting styles of both parents, the adversarial legal process, and sibling relationships (Friedlander & Walters, 2010). However, the failure to distinguish between alienation and justified estrangement represents a fundamental problem in both

research and practice. Resist/refuse dynamics are echoed in studies, with a Canadian review of 175 court decisions finding that absent of alleged alienation, the majority of cases involved justified estrangement: 7% resulted from abuse or violence, 35% from poor parenting by the rejected parent, and 20% from disengagement rather than alienation (Bala et al., 2010). More concerning is that researchers alleging parental alienation behaviors acknowledge that no reliable instruments exist to differentiate parental alienation from justified estrangement in cases where children have been victimized by abuse or family violence and appropriately fear or reject the offending parent (Saini et al., 2016). Together, these findings suggest that labeling children's contact resistance as "parental alienation" without thoroughly investigating the rejected parent's behavior risks silencing children's legitimate concerns and returning them to unsafe situations.

VI. THE DV-PA CONNECTION

Concerning is the striking correlation between PA allegations and documented domestic violence. Empirical research reveals a troubling pattern in which parental alienation allegations can function as a litigation strategy employed by parents accused of domestic violence and child abuse. Often, the mere assertion of alienation can radically change how a custody case unfolds. The Family Court Outcomes Study, a comprehensive analysis of ten years of U.S. custody cases found that when mothers alleged abuse by fathers, fathers' crossclaims of alienation virtually doubled mothers' risk of losing custody. Specifically, mothers who reported abuse lost custody 26% of the time overall, but when fathers responded with alienation allegations, mothers lost custody at dramatically higher rates, reaching 50% in cases where the court credited the father's alienation claim. However, alienation's impact was gender-specific: fathers alleging mothers were abusive were not similarly undermined in custody when mothers cross-claimed alienation. Most disturbingly, when courts gave credence to both the father's abuse of the mother and the mother's supposed alienation, mothers still lost custody to the abusive father, suggesting that often, alienation effectively "trumps abuse" in judicial decision-making (Meier, 2020). Studies of domestic violence shelter workers also echo this pattern, observing that PA allegations are frequently used against women who raise safety concerns (Lapierre & Côté, 2016).

Research on coercive control in intimate partner violence helps explain why alienation allegations correlate so strongly with domestic violence perpetration. Domestic violence scholars have long documented that abusive partners frequently denigrate mothers to children and aggressively seek to instill hostility toward her as part of ongoing patterns of control (Bancroft et al., 2012). Qualitative interviews with mothers and children further documents that coercive control affects children directly

and shapes caregiver-child relationships in ways that can be misread as alienation (Katz, 2015). Yet courts historically paid little attention to such conduct; it only became a matter of grave judicial concern after being reframed as "parental alienation" and deployed as a defense against abuse allegations (Meier, 2009). This is echoed by United Nations Special Rapporteur report findings on violence against women. The report found that parental alienation claims are disproportionately raised by fathers accused of domestic violence and child abuse, serving to shift attention away from their own conduct and onto the protective parent's response to that conduct (Alsalem, 2023). In light of this evidence, custody evaluators must prioritize the identification of coercive control patterns, including intimidation, surveillance, and system manipulation, rather than presumptively attributing children's protective responses to the influence of the non-abusive parent.

VII. PA THEORY HARMS CHILDREN

When courts accept PA claims, children suffer measurable harm. A series examining twenty-seven overturned custody decisions where the father was the abusive parent and the mother sought protection found that parental alienation allegations played a central role in each reversed ruling. In all twenty-seven cases, judges who ordered children into custody or visitation with the later-confirmed abusive parent had relied primarily on custody evaluators and guardians ad litem who alleged mothers were alienating children or coaching them to falsely report abuse. As a result of these parental alienation findings, 59% of the confirmed abusers were granted sole custody and the remainder received shared custody or unsupervised visitation. On average, these children spent 3.2 years in court-ordered custody of the abusive parent before decisions were reversed. During this time, 88% of these children reported new incidents of abuse and it was found that abuse often became increasingly severe and the children's mental and physical health frequently deteriorated (Silberg & Dallam, 2019). A widely publicized California case illustrates this harm. In this case, a judge disregarded a Child Welfare Services report substantiating sexual abuse allegations and instead accepted the stepfather's parental alienation claim, granting him custody and banning the mother from contact for ninety days. Three months later, the mother discovered sexually explicit images of her children, and the stepfather was charged with fourteen counts of forcible lewd acts and child pornography possession (Mooney, 2024). This is not an isolated case, it's estimated that 58,000 children annually are placed in dangerous homes due to PA-influenced custody outcomes (Meier, 2020).

When courts credit alienation claims in custody cases, children are frequently ordered into reunification programs that produce harmful outcomes. A 2023 ProPublica investigation reported that children in these

programs had their bedroom doors, bedding, food, and clothing removed to force compliance, were physically restrained by family members, and were threatened with jail or permanent separation from their mothers. Following the court-ordered intervention, the children required multiple emergency room visits for suicidal ideation, with siblings declaring a suicide pact if forced to remain with their father, while the camp counselor indefinitely extended their separation from their mother and prohibited them from receiving individual therapy. The investigation found, in several cases, judges and guardians ad litem admit to being unfamiliar with these programs yet still mandate them (Dreyfus, 2023). Research examining PA treatments echoes this, finding advocates have "failed to provide empirical support for the safety and effectiveness of their methods". None of the reunification therapies meet standards for evidence-based treatments, and reports from young adults who experienced these interventions suggest they are "harmful to children and adolescents." Some children describe these treatments as "the last straw," abandoning all contact with the rejected parent after turning 18 (Mercer, 2019, 2022).

VIII. LIMITATIONS

This review has several limitations worth noting. As a narrative rather than systematic review, the study selection involved subjective judgments about quality and relevance. The inclusion criteria prioritized sources that critically engaged with questions of validity rather than purely anecdotal presentations, which could introduce a bias toward PA-skeptical literature. This approach potentially underrepresents clinicians who report observing alienation behaviors in practice, even when such observations lack empirical validation. The search strategy, while covering major databases, likely missed emerging relevant grey literature, and non-English scholarship that might offer different perspectives or cultural contexts. Additionally, PA proponents have repeatedly reformulated the concept in response to criticism, and the most recent iterations may not be adequately represented in the available peer-reviewed literature. Finally, the contentious nature of this topic and its high stakes in custody determinations may influence what research gets conducted and published, creating potential publication bias in the available literature.

IX. IMPLICATIONS AND FUTURE DIRECTIONS

The findings of this review carry significant implications for family court practice and policy as well as mental health professionals. Courts must approach parental alienation claims with heightened scrutiny, particularly when they emerge alongside abuse allegations, as the evidence suggests PA functions as a

litigation strategy that redirects attention from documented safety concerns. Custody evaluators and mental health professionals require training in recognizing post-separation coercive control and understanding how children's protective responses to harmful parenting can be misinterpreted as alienation. The absence of validated assessment tools capable of distinguishing alienation from justified estrangement represents a critical gap that undermines forensic practice.

Future research should prioritize longitudinal studies examining outcomes for children in PA-influenced custody decisions, development of reliable assessment instruments that account for the multiple factors influencing post-separation parent-child relationships, and investigation of how abusive parents utilize family courts as mechanisms for continued control. Research incorporating the perspectives of young adults who experienced alienation-based interventions during childhood would also provide important insights into which judicial decisions proved helpful versus harmful, informing more child-centered approaches to these complex cases. Finally, given that PA proponents have repeatedly reformulated the concept following criticism, updated research must assess whether these newer versions address the ongoing concerns documented here.

X. CONCLUSION

Decades of empirical evidence show that parental alienation, despite its evolution from Gardner's original syndrome formulation, remains substantially unsupported by rigorous research and continues to be rejected by major professional medical and psychological organizations. This analysis has shown that the behaviors attributed to alienation are better explained as justified estrangement, reflecting children's legitimate responses to harmful parenting rather than manipulation by a protective parent. The correlation between PA allegations and domestic violence perpetration shows a troubling pattern in which family courts become vehicles for post-separation coercive control, with measurable consequences for child safety and well-being. When custody evaluators and judges accept alienation claims without thoroughly investigating the rejected parent's conduct, children are placed at risk of continued abuse, inappropriate therapeutic interventions, and prolonged separation. These findings have significant importance for legal and mental health practice, demanding that courts and clinicians approach alienation allegations with appropriate skepticism, especially when they arise alongside documented safety concerns. Until the field is able to validate PA as empirically sound, and distinguish alienation from justified estrangement, courts and clinicians should approach such allegations with the same skepticism applied to other discredited theories, putting the safety of the child above all else.

ACKNOWLEDGEMENT

This research was made possible through the work of numerous researchers, clinicians, and advocates who have critically examined parental alienation claims in custody proceedings. Their contributions to the empirical literature and professional guidance documents have been instrumental in the completion of this review.

REFERENCES

- [1] Alsalem, R. (2023, April 13). *Special rapporteur on violence against women and girls | ohchr*. United Nations Human Rights Council. <https://unwomen.de/wp-content/uploads/2023/06/G2307018-Report-of-the-Special-Rapporteur-on-violence-against-women-and-girls-its-causes-and-consequences-Reem-Alsalem-2023.pdf>
- [2] American Psychological Association. (1996). *Violence and the Family: Report of the American Psychological Association Presidential Task Force on Violence and the Family*. ERIC. <https://eric.ed.gov/?id=ED399073>
- [3] APSAC. (2023, September 6). *APSAC announces revisions to its definitions of psychological maltreatment - association of professionals solving the abuse of children*. American Professional Society on the Abuse of Children (APSAC). <https://apsac.org/apsac-announces-revisions-to-its-definitions-of-psychological-maltreatment/>
- [4] Bala, N., Hunt, S., & McCarney, C. (2010). Parental alienation: Canadian Court cases 1989–2008. *Family Court Review*, 48(1), 164–179. <https://doi.org/10.1111/j.1744-1617.2009.01296.x>
- [5] Bancroft, L., Silverman, J. G., & Ritchie, D. (2012). *The Batterer as parent: Addressing the impact of domestic violence on family dynamics*. SAGE.
- [6] Bruch, C. S. (2001). Parental Alienation Syndrome and Parental Alienation: Getting it Wrong in Child Custody Cases. *SSRN Electronic Journal*. <https://doi.org/10.2139/ssrn.298110>
- [7] Dreyfus, H. (2023, May 18). *In court-ordered Family Reunification Camps, kids allege more abuse*. ProPublica. <https://www.propublica.org/article/family-reunification-camps-kids-allege-more-abuse>
- [8] Friedlander, S., & Walters, M. G. (2010). When a child rejects a parent: Tailoring the intervention to fit the problem. *Family Court Review*, 48(1), 98–111. <https://doi.org/10.1111/j.1744-1617.2009.01291.x>
- [9] Gardner, R. A. (1987). *The parental alienation syndrome and the differentiation between fabricated and genuine child sex abuse*. Creative Therapeutics.
- [10] Gardner, R. A. (1992). *The parental alienation syndrome: A guide for mental health and legal professionals*. Creative Therapeutics.
- [11] Gardner, R. A. (1999, June 9). *Misperceptions Versus Facts About Richard A. Gardner, M.D.*. Canadian Children's Rights Council. <https://canadiancrc.com/parental-alienation-canada/dr-richard-gardner-pedophilia-facts-fiction-lies-parental-alienation.aspx>
- [12] Gardner, R. A. (2001). *Therapeutic interventions for children with parental alienation syndrome*. Creative Therapeutics.
- [13] Houchin, T. M., Ranseen, J., Hash, P. A. K., & Bartnicki, D. J. (2012). The Parental Alienation Debate Belongs in the Courtroom, Not in DSM-5. *The Journal of the American Academy of Psychiatry and the Law*, 40(1), 127–131.
- [14] Johnston, J. R. (2003). Parental alignments and rejection: An empirical study of alienation in children of divorce. *The Journal of the American Academy of Psychiatry and the Law*, 31(2), 158–170.
- [15] Johnston, J. R., & Kelly, J. B. (2004). Rejoinder to Gardner's "commentary on Kelly and Johnston's 'the alienated child: A reformulation of parental alienation syndrome.'" *Family Court Review*, 42(4), 622–628.
- [16] Katz, E. (2015). Beyond the physical incident model: How children living with domestic violence are harmed by and resist regimes of Coercive Control. *Child Abuse Review*, 25(1), 46–59. <https://doi.org/10.1002/car.2422>
- [17] Kelly, J. B., & Johnston, J. R. (2001). The alienated child: a reformulation of parental alienation syndrome. *Family Court Review*, 39(3), 249–266. <https://doi.org/10.1111/j.174-1617.2001.tb00609.x>
- [18] Lapierre, S., & Côté, I. (2016). Abused women and the threat of parental alienation: Shelter Workers' perspectives. *Children and Youth Services Review*, 65, 120–126. <https://doi.org/10.1016/j.childyouth.2016.03.022>
- [19] Laviates, S. (2003, June 9). *Richard Gardner, 72, dies; cast doubt on abuse claims (published 2003)*. The New York Times. <https://www.nytimes.com/2003/06/09/nyregion/richard-gardner-72-dies-cast-doubt-on-abuse-claims.html>
- [20] Meier, J. S. (2009). A historical perspective on parental alienation syndrome and parental alienation. *Journal of Child Custody*, 6(3–4), 232–257. <https://doi.org/10.1080/15379410903084681>
- [21] Meier, J. S. (2019). Child custody outcomes in cases involving parental alienation and abuse allegations. *SSRN Electronic Journal*. <https://doi.org/10.2139/ssrn.3448062>
- [22] Meier, J. S. (2020). U.S. child custody outcomes in cases involving parental alienation and abuse

- allegations: What do the data show? *Journal of Social Welfare and Family Law*, 42(1), 92–105. <https://doi.org/10.1080/09649069.2020.1701941>
- [23] Mercer, J. (2022). Reunification therapies for parental alienation: Tenets, empirical evidence, commonalities, and differences. *Journal of Family Trauma, Child Custody & Child Development*, 19(3–4), 383–401. <https://doi.org/10.1080/26904586.2022.2080147>
- [24] Milchman, M. S. (2019). How far has parental alienation research progressed toward achieving scientific validity? *Journal of Child Custody*, 16(2), 115–139. <https://doi.org/10.1080/15379418.2019.1614511>
- [25] Mooney, G. E. (2024). Gardner’s Zombie: Parental Alienation Syndrome, Parental Alienation, and the Threat Both Present to Rhode Island. *Roger Williams University Law Review*, 29(4), 786–821.
- [26] NCJFCJ. (2021, March 27). *A judicial guide to child safety in custody cases*. <https://www.ncjfcj.org/bench-cards/a-judicial-guide-to-child-safety-in-custody-cases/>
- [27] Rowen, J., & Emery, R. (2014). Examining parental denigration behaviors of co-parents as reported by young adults and their association with parent–child closeness. *Couple and Family Psychology: Research and Practice*, 3(3), 165–177. <https://doi.org/10.1037/cfp0000026>
- [28] Rueda, C. A. (2004). An inter-rater reliability study of parental alienation syndrome. *The American Journal of Family Therapy*, 32(5), 391–403. <https://doi.org/10.1080/01926180490499864>
- [29] Saini, M., Johnston, J. R., Jo Fidler, B., & Bala, N. (2016). Empirical studies of Alienation. *Parenting Plan Evaluations*, 374–430. <https://doi.org/10.1093/med:psych/9780199396580.003.0013>
- [30] Silberg, J., & Dallam, S. (2019). Abusers gaining custody in Family Courts: A case series of over turned decisions. *Journal of Child Custody*, 16(2), 140–169. <https://doi.org/10.1080/15379418.2019.1613204>
- [31] Willis, B., & O’Donohue, W. (2018). Parental alienation syndrome: A Critique. *Revista de Estudios e Investigación En Psicología y Educación*, 5(2), 74–81. <https://doi.org/10.17979/reipe.2018.5.2.4364>
- [32] World Health Organization. (2020). *Parental alienation*. <https://www.who.int/standards/classifications/frequently-asked-questions/parental-alienation>