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Looking Beyond the Sorting Hat: Deconstructing the “Five Factor Model” of Alienation

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ABSTRACT

One of the most common dilemmas encountered in today's family courts is the child who is strongly aligned with Parent A and rejects parent B. In the interest of supporting these children's opportunity to enjoy a healthy relationship with both of their caregivers, one can work to determine which parent is to blame or what combination of parent behavior, relationship dynamics, and practical circumstances result in this outcome. The Five Factor Model (FFM) does the former, promoting a stepwise approach to “diagnosing” parental alienation. This paper demonstrates that for all of its appeal, the FFM is deeply flawed and promotes a binary (good guy/bad guy) approach that readily exacerbates family tensions. We reject the FFM and advocate instead for a balanced conceptualization of the child's larger relationship ecology. A rubric guiding this ecological approach (Garber, in press 2023) is recommended.

Keywords

Alienation; Resist/Refuse Dynamics; Five Factor Model; Rubric; Ecological model

Today's family courts frequently encounter polarized family systems. In its simplest configuration, 12-year-old Billy will only reside with Parent A and resists or refuses all contact with Parent B. With or without the burdens and benefits of lawyers, Guardians ad litem, expert consultants, and expert witnesses, the Court is tasked to intervene in support of Billy's need to enjoy a healthy relationship with both (all) caregivers.

How the Court conceptualizes the dilemma of the polarized family system has a direct bearing on the breadth of any investigation or evaluation that might be ordered, the evidence that is allowed, the remedies that are entertained, and thereby the future of the child's relationships. This paper posits that narrow conceptualizations specific to allegations of alienation and abuse have their place if the Court's purpose is to identify and censure one “bad guy” parent for misdeeds. Asking “Is Parent A alienating?” or “Is Parent B abusive?” can be productive and may be necessary in the interests of safety, but neither question is adequate or appropriate by itself if the Court's purpose is to understand and serve the best interests of the child.

We posit that the Five Factor Model (FFM; Bernet, 2020) of parental alienation promotes just such a binary good guy/bad guy conceptualization. The FFM's either/or approach instills an anchoring bias that blinds all involved to the broad spectrum of potentially relevant practical conditions and relationship pressures that commonly bear on understanding the child's position in the conflicted family system. As a result, the FFM inflames conflict, amplifies biases, distorts the Court's view of the child's needs, and ultimately cannot foster healthy parent-child relationships.

We posit instead that evaluators, investigators, and the Courts must seek to understand polarized family systems by asking broad questions that invite open-minded consideration of the full spectrum of relevant variables. Asking "Why is Billy aligned with Parent A and resisting or refusing contact with Parent B?" doesn't presume causation, doesn't create a binary or zero-sum expectation, and doesn't instill an anchoring bias. Asking this broad question expands the inquiry to consider the relationship ecology in which the child exists. This approach minimizes implicit and cognitive biases by inviting evaluation of the full spectrum of relationship dynamics and practical exigencies -including but not only alienation and abuse- that commonly converge to polarize children amidst their parents' conflicts (Garber, 2019; Garber et al., 2022). Broadening the lens of inquiry away from binary questions of guilt and blame to consider the system as a whole is an acknowledgment that human relationships are incredibly complex, that every facet of the family contributes to its functioning, and that child-centered remedies must be similarly inclusive.

The Five Factor Model (FFM)

(Bernet & Greenhill, 2022, p. 591). (Baker et al., 2012; Bernet, 2020; Bernet & Greenhill, 2022; Joshi, 2021) is proposed as a means for "diagnosing" parental alienation.

The FFM is described by its proponents as a logical path "... for diagnosing PA [parental alienation] by understanding and identifying the components of this condition" (Bernet & Greenhill, 2022, p. 591).¹ "[W]hen all five factors are present, one can determine that the child is alienated" (Joshi, 2021, p. 83). According to Gottlieb (2020a, p. 231) "the Five-Factor Model can be used to differentiate alienation and estrangement." While differentiating alienation and estrangement is often necessary, it must never be mistaken as sufficient. Unfortunately, the FFM is routinely presented in print and in Court as sufficient for resolution of the bottomless pit of back-and-forth binary alienation versus abuse allegations that tend to characterize this type of litigation. This misleading

¹The first author has often emphasized that the verb "diagnose" is associated with the medical model of individual pathology and therefore is misleading in this context. The relationship variables at issue are dynamics, not diagnoses, and can only be identified in systems (e.g., family) not within individuals.

and inaccurate dichotomy is blind to a host of other systems-based and idiosyncratic variables that are often related to resist/refuse dynamics.²

The FFM is a refined and reorganized restatement of Gardner's original 1987 formulation of the Parental Alienation Syndrome as modified by Baker et al. (2012) and propounded today by a very vocal minority among family law professionals.³ As described by Bernet and Greenhill (2022), the FFM states that the preferred parent (i.e., Parent A in our generic terms) should be identified as alienating if the following five conditions apply:

- (1) "The Child Manifests Contact Resistance or Refusal, i.e., Avoids a Relationship with One of the Parents," and
- (2) "The Presence of a Prior Positive Relationship Between the Child and the Rejected Parent," and
- (3) "The Absence of Abuse, Neglect, or Seriously Deficient Parenting on the Part of the Rejected Parent," (i.e. realistic estrangement) and
- (4) "The Use of Multiple Alienating Behaviors on the Part of the Favored Parent," and
- (5) "The Child Exhibits Many of the Eight Behavioral Manifestations of Alienation."

The FFM's recipe-like simplicity is as appealing to overwhelmed professionals as it is contrary to common sense. Human relationships are ineffably complex.⁴ Recognizing this, a close examination of the FFM finds it fatally flawed by circular reasoning, confirmational biases, inconsistencies, and false dichotomies built upon a very weak and selective empirical foundation. These concerns are detailed in the following discussion of each factor in succession.

Factor 1: "The Child Manifests Contact Resistance or Refusal, i.e., Avoids a Relationship with One of the Parents" (Bernet & Greenhill, 2022).

Presuming that each of the FFM's five successive factors is intended to act like a filter such that a case that passes all five filters can be identified as an instance of alienation, this first criterion need not be very specific.

²We acknowledge that the proponents of the FFM recognize that there is a larger context relevant to understanding resist/refuse dynamics, e.g., "There are several causes of contact refusal, and it is necessary to conduct an evaluation to determine whether the cause in a particular case is PA or some other issue within the child or the family" (Bernet and Greenhill, 2022, p. 591). However, the FFM is routinely promulgated (or at least misunderstood) as the singular recipe for identifying the cause of resist/refuse dynamics.

³Note that Baker originally promulgated a Four Factor Model (Baker, 2020b). She subsequently inserted the predicate resist/refuse behavioral condition as Factor 1, backing up the original four conditions into positions two through five to create today's FFM. Note also a Canadian Court's report that Baker described an alternative FFM as including "(1) evidence that the disfavored parent had an adequate relationship with the child prior to the current contact refusal; (2) evidence of absence of founded abuse or neglect on the part of a disfavored parent; (3) *evidence that the favored parent engaged in intentional misrepresentation to professionals*; (4) evidence that the favored parent engaged in behaviors consistent with alienation; and (5) evidence that the child exhibited behaviors consistent with alienation" (C.J.J. v. A.J., 2016 BCSC 676 §243; emphasis added).

⁴The simplicity and appeal of the FFM as evident for example in worksheet format (e.g., Evans, 2022) contradicts those proponents who argue that the identification of alienation requires "specialized" skills such as "pattern recognition," "counterintuitive reasoning" and "backwards thinking" (Gottlieb, 2020a; Joshi, 2021).

However, Factor 1 is so vague that it, on its own, creates confusion. The FFM fails to define the terms “contact,” “resist,” and “refuse.” It does not define the duration, severity, developmental relevance, and/or relationship context of these phenomenon. As a result, few or no cases can be ruled out.

As one example of this ill-definition, consider Baker’s (2020a, p. 209) discussion of Factor 1: “This might involve complete contact refusal, or it might involve agreeing to contact but resisting/refusing attempts on the part of the parent for communication, affection, and interaction. In these situations, the child may be physically present but is not emotionally present.” While Baker’s narrative is logically appealing, it also describes many normal teenagers, many children with autism spectrum and anxiety disorders, and many of those with trauma histories.

Healthy children normatively resist or refuse contact with each of their parents at various points in the course of normal development, perhaps most commonly in the teenage years. Indeed, Bernet et al. (2020, p. 1225) acknowledge that, “contact refusal may be transitory and self-limited.” Elsewhere Bernet et al., (2010, p.186) advised that, “a rebellious adolescent may not have a specific mental disorder but may temporarily refuse to have contact with one parent even though both parents have encouraged him to do so and a court has ordered it.” Baker et al. (2019, no pagination) acknowledged that age is relevant when considering a child’s rejection of a parent: “ . . . older youth were more likely to be rated as engaging in [parent-child attachment-disrupting] behaviors than younger children. We understand this finding in light of the increased negativity and independence from parents expressed during adolescence Part of the normal developmental processes that occurs in the teen years make it more possible for them to see their parents as separate and flawed humans.”

The overly inclusive and poorly defined nature of Factor 1 invites over-identification of alienation (that is, false positive findings). Family law providers are all too familiar with the many ways in which confirmational bias can prompt emotional parents and their zealous advocates to make Everests out of molehills at tremendous cost to all, most especially to the child.

Factor 2: “The Presence of a Prior Positive Relationship Between the Child and the Rejected Parent” (Bernet & Greenhill, 2022).

Baker defines Factor 2 as a definitive threshold: “If that [child-Parent B] bond did not exist, then Factor 2 is not present and the child is not alienated” (2020a, p. 212). Period. This condition is logically appealing. Certainly, Parent A cannot be held responsible for undermining a relationship that never existed in the first place. “This factor precludes parents who were habitually absent, uninvolved, and uncaring from claiming that they are victims of parental alienation” (Baker, 2020, p. 104).

Upon closer examination, however, Factor 2 poses at least two significant challenges. First is the dilemma of defining “positive relationship.” Does this mean the presence of a secure attachment bond (Sroufe et al., 2005)? Does it distinguish those children with secure and insecure attachments from those with disorganized attachments? Does it distinguish those with secure attachments from all others? Or is it based upon some other measure of relationship quantity or quality?

As evidence of the historical quality of the child’s relationship with parent B, proponents of the FFM often refer to photographs and videos and written communications (e.g., letters, e-mail, text messages). For example: “it is usually easy for the evaluator to determine whether factor two is present in the family. There may be photographs and videos showing the parent and child enjoying vacations together and being affectionate with each other” (Bernet & Greenhill, 2022, p. 592). Setting aside the ever-growing reality of doctored audio and video recordings (Boháček & Farid, 2022) and artificial intelligence-generated media, one is still left with the errors inherent in (a) presuming that select images submitted for review are representative, (b) conflating the appearance of positive experiences with positive relationships and (c) conflating the usefulness of static historical data with the usefulness of dynamic, contemporary data. Experience proves that even the most abusive parents are able to produce photos of smiling and laughing children easily mistaken as evidence of a healthy relationship.

The second challenge posed by Factor 2 is its essential circularity: the FFM stipulates that alienation cannot occur if a child did not once have a positive relationship with the rejected parent even though the reason that the child may never have had a positive relationship with the rejected parent is alienation. Bernet (2020, p. 7) recognized this dilemma: “There is a rare exception to the requirement for Factor Two. Suppose that the preferred parent took control of the child during their infancy, totally preventing the rejected parent from forming a meaningful relationship with the child from the beginning.” He goes on then to disagree with Baker by concluding that Factor 2 is *not* a definitive threshold because, “. . . it may still be concluded that the preferred parent has used [alienating behaviors] to prevent the rejected parent from ever having a prior positive relationship.” In this case, we must ask what then is the purpose of Factor Two?

Factor 3: “The Absence of Abuse, Neglect, or Seriously Deficient Parenting on the Part of the Rejected Parent” (Bernet & Greenhill, 2022).

“The purpose of the [third] factor . . . is to preclude parents who have engaged in behaviours that warrant a child’s rejection from claiming that they are victims of parental alienation . . . Abuse or neglect on the part of the rejected parent provides an alternative explanation for why a child would be rejecting a parent [i.e., estrangement or justified rejection] and hence negates

the validity of alienation as the explanation for the child's behaviour." (Baker, 2020b, p. 103)

Fortunately, "abuse" and "neglect" are defined by the law in most jurisdictions, suggesting that Factor 3 might be consensually -even if not objectively-defined. Unfortunately, multiple logical, scientific, and definitional problems undermine this promise, leaving Factor 3 vague and difficult to apply in a consistent manner across cases and across professionals.

(a) **Jurisdictional-specificity.** Most jurisdictions define abuse and neglect as legal concepts. However, how abuse and neglect are codified varies tremendously across jurisdictions (Department of Health and Human Services, 2020). To the extent that the FFM defines alienation as the mutually exclusive complement of abuse/neglect, then the definition of alienation must similarly vary by jurisdiction. Thus, behavior that meets the legal definition of abuse and/or neglect in one jurisdiction and thereby rules out alienation may not do so in another jurisdiction thereby ruling alienation in. This may be acceptable to the extent that alienation exists as a legal construct but creates enormous challenges as a psychological construct.⁵

(b) **Subjectivity.** Above and beyond problems with the terms "abuse" and "neglect," Factor 3 requires the "... absence of ... seriously deficient parenting." This and similarly vague phrases appearing in other publications (e.g., "sub-par parenting" [Gottlieb, 2020a]; "suboptimal parenting" [Baker & Eichler, 2016; Harman et al., 2018]; "significantly inept" [Fidler et al., 2013, p. 13]) are not defined by the law, psychology, or by those who invoke them in support of the FFM. Thus, even within jurisdiction, there is no clear line distinguishing parenting behaviors that might warrant identification of estrangement by type, severity, or frequency. Across jurisdictions, these catch-all phrases appear to be very subjective, likely vary widely by culture and era, and generally exist in the eye of the beholder.

(c) **Proportionality.** Proponents of the FFM often refer to a child's rejection of a parent in proportion to the nature, frequency, and/or severity of that parent's bad acts. For example, "It is essential to determine whether the now-rejected parent engaged in the types of abusive or neglectful behaviors that would justify fear, hatred, and rejection by the child. This factor requires that the child's rejection of the target parent is far out of proportion to anything that parent has done to justify the rejection (Bernet, 2020, p. 7).⁶ Implicit in such descriptions is the idea that there is an objective scale that equates parental misdeeds and child reactions. In reality, a particular child's subjective experience and interpretation of any given experience can only be

⁵By analogy, marijuana use is now legal in many jurisdictions and remains illegal in others. The psychology of marijuana dependence remains the same regardless of the law.

⁶See also Wallerstein and Kelly (1980), p. 262: "By definition, the core feature of alienated children is the extreme disproportion between the child's perception and beliefs about the rejected parent and the actual history of the rejected parents' behaviors and the parent - child relationship."

considered in the context of that child's unique history, personality, temperament, resilience, and expectations (Frissa et al., 2016): "it can be extremely difficult to make determinations regarding what is justified or unjustified, reasonable or unreasonable" (Fidler et al., 2013, p. 32). Baker et al. (2012, p. 189) acknowledged this plainly in a different context: "One might argue that from the child's perspective [that] the perceived misdeeds of the targeted parent are significant irrespective of the impressions of the court or findings from CPS."

(d) **Vicarious experience** Children's vicarious experiences can have significant impact on their perceptions, emotions and behavior (Howard, 2021). Factor 3's reference to "abuse, neglect, and seriously deficient parenting" focuses evaluators and the Court on the child's direct experience of Parent B's behavior. This very narrow approach fails to account for the child's indirect or vicarious experience of Parent B's behavior with and toward others (Kelly & Johnston, 2001⁷). This includes, for example, the child's experience of Parent B's coercive control and intimate partner violence toward Parent A and abusive acts toward the child's siblings.

Gottlieb (2020a) acknowledged the potential role of vicarious experience: "In very rare cases, this reporter has encountered an estranged child, but the rejection was not the consequence of abusive or traumatic treatment by the parent toward the child. It was, instead, abusive treatment of the other parent – such as in domestic violence. In cases in which one parent seriously maltreats or abuses the other parent, the child instinctively sides with the abused parent."

(e) **Instinct?** Gottlieb's suggestion that a child "instinctively" sides with an abused parent exposes yet another problem with the FFM. That is, a child who is not him- or herself a victim of Parent B's abuse but who has witnessed Parent B abusing Parent A may align with Parent A and resist or refuse contact with parent B. The FFM would force this very familiar dynamic into the binary alienation versus abuse model when, in fact, neither has occurred.⁸

(f) **Child Protective Services.** One might relegate definition of the criteria relevant to Factor 3 (i.e., abuse, neglect, "seriously deficient parenting") to Child Protective Services (CPS) if CPS evaluations were reliable and valid indicators of abuse and neglect. Indeed, proponents of the FFM often cite the presence of multiple unsubstantiated reports of abuse and neglect as "virtually diagnostic" of alienation (Gottlieb, 2020a p. 16).⁹

⁷Referring to "... children who are estranged as a cumulative result of observing repeated violence or explosive outbursts of a parent during the marriage or after separation, or who were themselves the target of violence and abusive behavior from this parent" (Kelly & Johnston, 2001, p. 253).

⁸Freed of the myopic binary view, an evaluator attuned to the child's relationship ecology might consider whether the child has been adultified or parentified in relation to Parent A (e.g., Garber et al., 2022).

⁹This quote by an FFM advocate illustrates the binary nature of the model and the way that proponents attempt to rush to judgment.

For example, Gardner (1989, p. 109) opined that “The fabricated sex abuse allegations may very well be one manifestation of [Parental Alienation Syndrome].” However, Fidler et al. (2013), p. 41, note, “child protection workers report that most of these unfounded allegations are a product of miscommunication or misunderstanding ... rather than deliberate fabrications by the accusing parent”

In fact, CPS investigation error rates are very high (Lyon et al., 2017). One study concluded, for example, that “... the median estimated false positive and false negative error rates were 0.18 and 0.36, respectively” (Herman & Freitas, 2010). That is, by one estimation eighteen out of every one hundred substantiated CPS investigations are incorrect. Thirty-six of every one hundred unsubstantiated CPS investigations are incorrect. In a second, very carefully designed study, false positive rates were almost twice as high (0.44) while false negatives were about the same (0.33) (Hershkowitz et al., 2007). This means that to the extent that the FFM relies on CPS determinations to identify alienation, as many as forty-four out of one hundred judgments may be wrong.

(g) **The half-life of child abuse?** Factor 3 does not require that Parent B’s bad acts are contemporaneous with the child’s rejection. In fact, none of the five factors identify the time frame in which the relevant variable needs to have occurred. This adds an additional layer of ambiguity particularly to Factors 4 and 5 discussed below.

Bernet (2020, p. 7) conjectured: “... suppose that a parent abused a child several years previously, engaged in treatment, and subsequently this parent and child enjoyed a healthy and mutually enjoyable relationship. Then, it is possible that the favored parent repeatedly reminded the child of the history of abuse and used that information to undermine the child’s relationship with the now-rejected parent.”

If Bernet’s hypothetical is meant to further define Factor 3 and the criteria relevant to identify alienation, then a number of questions arise. These include: (1) The FFM does not explicitly consider the effect of Parent A’s negative words, actions, and expressed emotions about Parent B to and around the child *when Parent B is known to be abusive or neglectful*. If we consider this a facet of estrangement for the sake of discussion, then (2) What is the half-life of estrangement? How long after a child experiences Parent B’s abuse does Parent A’s previously necessary and appropriate cautions about Parent B become evidence of alienation?¹⁰ (3) Is the child’s age and/or maturity relevant? Does the “several year” interval post-abuse mean the same thing to a five-year-old and a fifteen-year-old? (4) Is the type, severity, or frequency of Parent B’s abuse relevant to the child’s experience of Parent B at the time of

¹⁰“I have cases where there is abuse and someone says, ‘forget it, get over it, its ancient history.’ But, a parent has been traumatized and those cases are very difficult to resolve” (Jaffe as quoted in Fidler et al., 2013, p. 31).

abuse or “several years” later? (5) If the child subsequently enjoyed a “healthy and mutually enjoyable” relationship with the rehabilitated Parent B, then who is “the favored parent” in that scenario? And perhaps most critically, (6) How might such a child (re-)establish a “healthy and mutually enjoyable relationship” with Parent B if Parent A “... repeatedly reminded the child of the history of abuse”?

(h) **Defensive alienation?** According to the FFM, not only is the threshold for identification of estrangement extremely high and the threshold for identification of alienation extremely low, proponents argue that Parent B’s misbehaviors (should any be identified) are to be attributed to Parent A: “Should the alienated parent exhibit sub-par parenting behaviors – and most alienated parents do not – such behaviors are usually a reaction to the abuse, humiliation, and rejection by the alienating parent and child” (Gottlieb, 2020a).¹¹

Joshi (2021, p. 193) advised that: “... a targeted parent might inadvertently and out of frustration manifest suboptimal parenting behaviors that may confirm what the child falsely believes and can be used by the alienating parent ...” This may be, as Joshi suggests, a “toxic and vicious cycle” (Joshi, 2021, p. 194) but where Joshi means to defend Parent B as a victim of the Parent A’s alienation, the more parsimonious interpretation highlights the tautology of the five factors in which all roads lead to Parent A as an alienator.

(i) **Anti-instinctual?** Proponents of the FFM assert that “... because of our long dependency period, the [child’s] instinct for a parent is part of the instinct for survival. It is therefore anti-instinctual to reject even an abusive parent – let alone a loving parent with whom the child had had a positive relationship prior to the onset of the rejection” (Gottlieb, 2021).¹² By this reasoning, a child who does reject a parent is acting contrary to human nature and could only do so under duress, for example, at the urging of another parent.

Attachment research has demonstrated many times over that children actively adapt their behavior to their accumulated experience of each particular caregiver’s sensitivity and responsiveness. Children who experience a particular caregiver as sensitive and responsive to their needs tend to develop a secure attachment as evident in an ability to use the caregiver as an emotional anchor or secure base (e.g., Ainsworth & Wittig, 1969; Bowlby, 1969, 1973; Sroufe et al., 2005).

By contrast, children who experience a particular caregiver as insensitive and unresponsive to their needs tend to develop an insecure-resistant, -avoidant, or disorganized attachment. These children may cling to and/or reject their caregivers. An insecure-avoidant child, for example, “actively

¹¹We argue that all parents, as humans, have strengths and weaknesses. Therefore, to state that most alienated parents do not exhibit sub-par parenting behaviors, is not credible. All parents, at least at times, demonstrate sub-par parenting behaviors.

¹²Baker et al.’s (2016, p. 181) literature review of children in foster care does not find evidence for a universal bond continuing between children and their abusive biological parents: “... almost all of the studies had *at least some* youth who expressed longing for their birth parents ...” (emphasis added).

avoids and ignores [the] parent on reunion i.e., by moving away, turning away, or leaning out of arms when picked up” (Hesse, 1999, p. 399).

It is furthermore well established that prolonged parent-child separation can cause a child to grieve the loss, a process marked by successive phases of protest, despair, and detachment. In this final phase of grief, a child will angrily reject the approach of the parent upon his or her return (Bowlby & Robertson, 1952). Thus, counter to the FFM proponents’ “anti-instinctual” claim, it is normal and adaptive to shun a caregiver who has been experienced as insensitive and unresponsive, even if those behaviors do not rise to the level of abuse or neglect.

How could these data be misconstrued so dramatically? A careful reading of the FFM proponents’ position suggests that these professionals disregard the qualitative nuances that differentiate attachment by types of security. Instead, they treat attachment as a binary variable as if it is either present or absent regardless of the quality of the relationship. For example, Baker advised that “[w]e defined attachment as a desire for proximity and/or connection to the caregiver [as evident in] any expression of a desire for physical proximity and/or contact with the caregiver including yearning and longing to be reunited with that person” (Baker & Eichler, 2016, p. 179).

Children seek proximity to adults for many very different reasons. For the securely attached child, proximity means succor and co-regulation in times of stress. For some insecurely attached children, proximity is insurance against abandonment. For others, proximity means assuring the caregiver’s well-being or the well-being of another child in that adult’s care, as is the case for the parentified child (Garber, 2011, 2021). Proximity may be associated with access to resources or escape from something even more threatening or a combination of these and other variables. Thus, while it may be true that even abused children maintain an attachment to their parents, this glosses over the emotional meaning and function of that child’s proximity seeking behaviors.

This logic applies equally well to the alienated child. It is just as easy to gloss over the quality of the relationships involved and assert that alienated children maintain an attachment with the rejected parent, albeit hostile and irrational. It may be that the experience of Parent A’s alienating behaviors undermines the child’s previously secure relationship with Parent B (Garber, 2004), but the child’s generic bond to that parent persists as evidenced by the “manifestations” codified as Factor 5 and as suggested by programs that purport to “jump start” the child’s relationship with the rejected parent in days (e.g., Harman et al., 2021). Whereas the continuing existence of the parent-child bond can be elicited from abused children (Baker and Eichler, 2016; Maaskant et al., 2016), alienated children adamantly deny any similar desire for a relationship (Bernet et al., 2018, 2020). However, FFM proponents are clear that, “the child’s wishes may not reflect the child’s actual position or best interests” (Joshi, 2021, p. 117).

There is, in addition, a false equivalency inherent in the comparison of abused and alienated children: Whereas many abused children caught up in

child protective services cannot afford to reject their abusive parent lest they be forced into foster care or have no caregiver whatsoever, by definition the alienated child can afford to do so. S/he has another parent ready and willing to provide care. Baker recognized this: “. . . children in the child protection system, where there is abuse and neglect and often only one active parent, may not be the same as children from divorce, where two parents are fighting over the child” (Baker as cited in Fidler et al., 2013, p. 13).

(j) **The hybrid case.** Perhaps most contradictory of Factor 3 of the FFM is the dilemma of the hybrid case. Proponents of the FFM acknowledge that it is possible for a child’s resist/refuse behavior to be associated with the child’s experience of *both* Parent A’s alienating behaviors and Parent B’s abusive/neglectful behaviors. Indeed, many professionals argue that hybrid cases are the rule, not the exception (Fidler & Bala, 2020; Friedlander & Walters, 2010; Garber, 2019; Garber et al., 2022; Johnston et al., 2005; Saini et al., 2016).

Joshi (2021, p. 9) advises that, “The existence of [estrangement] does not necessarily mean an absence of [alienation]. At times, despite a pattern of abuse or neglect demonstrated by a rejected parent, there may *also* exist evidence of alienating behaviors.”¹³ This admission undermines the logic of Factor 3 entirely: if Parent B is abusive or neglectful, then Parent A’s negative words, actions, and expressed emotions about Parent B may be *warranted* and alienation cannot exist by definition. In and of itself, this defeats the entire FFM. It also points out the apparent zeal that alienation advocates and advocates of the FFM have for identifying alienation when there is a disrupted parent-child relationship in the context of parental separation.

Note in this regard a 2012 study that examined the discriminative validity of the Baker Alienation Questionnaire (BAQ; Baker et al., 2012). The BAQ is a 28-item, self-report instrument administered to children. The authors report that the instrument successfully discriminated between children referred by the courts for reunification therapy and thereby presupposed by the authors to have been alienated and other children court-referred for evaluation, supervised visitation, or individual therapy and thereby presupposed by the authors not to have been alienated. However, one child among the 40 studied scored high on alienation *and* was known to have endured abuse/neglect in his home. This child would appear to represent the hybrid exception that disproves the Factor 3 rule: the presence of abuse/neglect does not obviate consideration of alienation.

Factor 4: “The Use of Multiple Alienating Behaviors on the Part of the Favored Parent” (Bernet & Greenhill, 2022).

¹³Citing to *Martin v. Martin* (Michigan Court of Appeals 349,261, 01.28.2020). The appeals court quoted the lower court as follows: “The Court concludes that [Mother] has engaged in conduct intended to alienate the children from their father, but the estrangement that [Father] has experienced can also be explained by his own language and conduct.” (see [https://www.courts.michigan.gov/siteassets/case-documents/uploads/opinions/final/coa/202118_c349261\(65\)_rptr_14o-349261-final-i.pdf](https://www.courts.michigan.gov/siteassets/case-documents/uploads/opinions/final/coa/202118_c349261(65)_rptr_14o-349261-final-i.pdf)).

Factor 5: “The Child Exhibits Many of the Eight Behavioral Manifestations of Alienation” (Bernet & Greenhill, 2022).

We discuss these two factors together because Baker (2018) finds that these two factors together account for as much as 82% of professionals’ identification of alienation. This suggests that the ambiguities, inconsistencies, and tautologies inherent in Factors 1, 2, and 3 as discussed above may be irrelevant.¹⁴ Indeed, the behavior of Parent B -the rejected parent- may be irrelevant to professionals seeking to identify alienation if 82% of professionals base their identification of alienation on the behavior of Parent A and on the behavior of the child. The tragic reality is that family law professionals look almost exclusively at the behaviors of the aligned parent -Parent A- and the child to determine whether alienation has occurred.

Factors 4 and 5 each identify a menu of behaviors said to be associated with if not definitive of alienation. These lists reappear often through the FFM literature and will not be replicated here. They were first propounded by Gardner (1998) as characteristic of PAS and have been codified (Baker, 2005; Baker & Darnall, 2007) and operationalized in the form of self-report retrospective questionnaires (Baker & Chambers, 2011; Baker & Eichler, 2016; Bernet et al., 2018, 2020, 2021; Hands & Warshak, 2011; Laughrea, 2002; Rowen & Emery, 2014).

Alienation Strategies

Baker references research using the Baker Strategies Questionnaire (BSQ; Baker & Chambers, 2011) as evidence that the Factor 4 strategies are reliable and valid. She reported that the twenty BSQ Likert endorsements demonstrated a high degree of internal consistency, suggesting that the items all tap a single underlying construct. Studies repeatedly demonstrate that adult respondents’ retrospective reports of their parents’ alienating behaviors on a variety of instruments distinguish intact from divorced families-of-origin on several distinct measures (Baker & Chambers, 2011; Hands & Warshak, 2011; Laughrea, 2002). Together, these findings suggest that these instruments may be externally valid to the extent that they correlate with divorce. However, none of these studies demonstrate a link between parental alienating strategies and a child’s polarization amidst the adult conflict or resist/refuse dynamics specifically.

In addition:

- (a) none of these studies independently corroborate participants’ self-reports, thereby leaving open questions about veracity and suggestibility associated with how questions are asked, how self-selected samples with

¹⁴To be clear, Baker (2018) studied the Four Factor Model. This inference regarding the relative unimportance of Factor 1 goes beyond her data since Factor 1 was not a part of the Four Factor Model.

an ax to grind are selected (Fidler et al., 2013), and confirmation bias. Baker and Eichler (2016, p. 483) acknowledged this weakness: “there is no way to ascertain whether student reports of their parents’ behavior or even their own behavior growing up is reliable and valid.” More recently Baker (2020, p. 239) acknowledged that “. . . in a sample of people who self-identify as victims of [parental alienation] there may be bias stemming from prior knowledge the participants have about the topic and preconceived ideas about what alienation is and how it presented in their family.”

- (b) There are no criteria for number, severity, frequency, duration, or recency of any of the strategies or manifestations thereby casting a very wide net and artificially making what is likely heterogeneous appear to be homogeneous
- (c) Many of these studies ask participants to recall family-of-origin experiences which for some occurred more than four decades earlier (e.g., Baker & Chambers, 2011). This is ironic given FFM proponents’ admonitions against relying on the veracity of children’s self-report and how easily false memories can be implanted (Gottlieb, 2020a).
- (d) All such studies draw conclusions based on relatively small samples with limited statistical strength. Lopez et al., (2014, p. 220) acknowledge this limitation explicitly: “Clearly, this is not the ideal situation (non-random sample and small sample size), so that the results of the analyses reported below should be treated with caution.”
- (e) Some studies are hobbled by the inappropriate use of parametric statistical analyses with non-parametric data (e.g., Likert ratings; Mercer, 2021).
- (f) There are no prospective longitudinal studies with which to determine whether some children who experience parental alienation strategies do not later evidence the manifestations and why. Setting aside the nuances of experimental design and statistical analyses, this concern is paramount. There’s no way presently to know how many children experience parental alienating behaviors without become polarized and thereby determine whether any of these “alienation strategies” are relevant.

Manifestations

The Factor 5 child “manifestations” list includes “. . . the eight criteria that are commonly accepted for the diagnosis of parental alienation” (Bernet et al., 2018, p. 776).¹⁵ This list is purported to describe “. . . behaviors that are unique and specific to alienated children and are typically not exhibited by a child

¹⁵We note that alienation is not a diagnosis and remind the reader that substantial efforts were mounted by Bernet and his colleagues to have parental alienation included in the DSM-5 but it was not included (e.g., Bernet and Baker, Gottlieb, 2020a).

even toward an abusive parent” (Baker, 2020, p. 227). This claim requires carefully controlled comparisons of the frequency of these behaviors among children who have been *independently* identified as alienated (i.e., not self-identified) and control groups who have not. There are no such studies.

Baker et al. (2012) reported that children’s self-report on the Baker Alienation Questionnaire (BAQ) reliably differentiated between those who had been identified by the court as alienated and other court-involved children who had not been identified as alienated. Unfortunately, the study does not clarify the criteria used to distinguish the two groups. However, Baker advised in an interview reported by Fidler et al. (2013, p. 89) that she (Baker) identified the alienated children in this study by “applying the eight manifestations of parental alienation syndrome (PAS) identified by Richard Gardner.” Thus, she chose children who fit specific criteria and then had them complete a questionnaire about the presence of those same criteria. If this is true, then the BAQ may be little more than a measure of the consistency of children’s self-report across time.

Baker and Eichler (2016) found that college students’ recall of their parents’ alienating behaviors correlated with their self-report of the eight manifestations: “respondents who reported that their mother tried to turn them against their father reported a statistically significantly greater number of parental alienation behaviors against their father” (p. 479).¹⁶ Here and elsewhere, a correlation is evident between adult alienation strategies (Factor 4) and child alienation behaviors (Factor 5) without the necessary concomitant demonstration that the child became polarized, and if so for how long and how severely.

Bernet et al. (2018) reported that children’s self-reports on a measure of splitting (i.e., painting one parent as all good and the other as all bad; one of the eight manifestations) reliably distinguished alienated from non-alienated children. Once again, it is not clear what criteria were used for distinguishing the samples. These data are further confounded by the fact that the alienated children’s responses were obtained under extreme duress (i.e., upon admission to an involuntary intensive reunification intervention together with their rejected parent) while the non-alienated children were assessed in more comfortable and agreeable circumstances. Comparing apples and oranges cannot help us understand these differences.

Do these criticisms of Factors 4 and 5 mean that the seventeen strategies and eight manifestations are irrelevant? Not at all. Some or all of the behaviors described in each list may prove to be a valuable clue to understanding why some children become polarized amidst their parents’ conflicts while others do not. At the moment, however, the data are insufficient to conclude that any of

¹⁶Apparently participants who did not report that their mother tried to turn them against their father did experience some alienating behaviors, albeit fewer. Does this mean then that the presence or absence of supposedly parental alienating behaviors is less important than the frequency, magnitude, or duration of such behaviors?

these behaviors are pathognomonic, that is, necessarily associated with alienation.

An ecological approach

As often as the FFM's proponents acknowledge that understanding the polarized family system requires much more than the binary forced-choice between alienation and estrangement, the model looks no further. Consider, for example, Baker and Eichler's (2016, p. 480) analysis of college students' responses to three very brief and face valid questionnaires concluding in part that, "For child's rejection of the mother, the contribution of father's alienation accounted for 5% of the variance . . . For child's rejection of the father, the contribution of the mother's alienation accounted for 15% of the variance." Thus, between 85% and 95% of the variance these authors associated with resist/refuse dynamics is not explained by alienating behaviors. Data like these demand that the field escape the anchoring bias associated with binary thinking and begin to ask the broader question, "what are the sources and the variables that result in this child aligning with Parent A and resisting/refusing contact with Parent B?"¹⁷

Bernet and Freeman (2013, p. 50) acknowledged that it is important to " . . . avoid arriving at a conclusion before considering all the possible underlying reasons why contact refusal is occurring in the family." Bernet and Greenhill (2022, p. 591) subsequently elaborated: "There are several causes of contact refusal, and it is necessary to conduct an evaluation to determine whether the cause in a particular case is PA or some other issue within the child or the family. Other causes of contact refusal include an understandable preference the child might have for one parent over the other; avoiding a loyalty conflict by gravitating to one parent and shunning the other; being worried or depressed, such as experiencing separation anxiety; being overly stubborn or oppositional; and estrangement due to previous maltreatment."

Perhaps most compelling is the joint statement issued by the Association of Family and Conciliation Courts (AFCC) and the National Council of Juvenile and Family Court Judges (NCJFCJ) stating in relevant part that "There should be no immediate label used for parent-child contact problems as there are multiple factors and dynamics that may account for these issues. These include interparental conflict before and after the separation, sibling relationships, the adversarial process/litigation,

¹⁷Gottlieb (2020a) invokes "the stopping rule" as relevant to application of the FFM. This refers to the Bayesian statistical principle that dictates when an iterative or progressive process should be terminated. For example, stopping rules are often required in drug trials as a means of minimizing adverse outcomes. In the context of family litigation, Gottlieb asserts that once sufficient evidence of alienation has been obtained, the stopping rule applies and no further evidence need be considered. Given Baker and Eichler's, (2016) findings, invoking "the stopping rule" upon determining that alienation is present leaves as much as 95% of the broader question unresolved.

third parties such as aligned professionals and extended family, a lack of functional co-parenting, poor or conflictual parental communication, child maltreatment, a response to a parent's abusive behaviors, the direct or indirect exposure to intimate partner violence, parental alienating behaviors, an alignment with a parent in response to high conflict coparenting, or a combination of these factors. Therefore, practitioners should maintain a broad lens and sufficiently consider the relative contribution of each potential factor before conclusions are made about cause."¹⁸

The best answer presently available is known as the Ecological Model (Polak & Saini, 2019, Garber, 2020; Garber et al., 2022; Walters & Friedlander, 2016). Faced with a polarized family system, the Ecological Model demands consideration of the full spectrum of associated dynamics and practical exigencies both as explanation of the system's imbalanced nature and as a template for defining best interventions. The Ecological Model includes variables constituting six domains of inquiry encompassing thirty-one inter-related questions. The elements of the six domains are all mutually compatible and frequently converge to determine any particular child's polarized position. A rubric has been proposed as one means of organizing evaluation of these very complex matters (Garber, in review 2023). The rubric is summarized in [Appendix A](#).

Discussion

Family law professionals concerned with serving the needs of a child aligned with Parent A and rejecting Parent B are wise to proceed cautiously. When answering complex questions such as why a child rejects a parent, it is wise to cast a wide net, ask broad questions, and consider multiple, disparate, and even seemingly contradictory hypotheses. Asking "is this alienation or abuse?" or "is this alienation or estrangement" limits inquiry, instills bias, presupposes an either/or binary outcome, inflames conflict, stands in contrast to the complex nature of human problems, and promotes a view of one parent as the "good guy" and the other as the "bad guy."

The Five Factor Model (FFM) asks this narrow, biasing question and therefore cannot adequately address the complexities inherent in parent child contact problems. Upon careful examination the FFM proves to be poorly defined, often circular, empirically weak, and predisposed to confirm that Parent A is alienating.

In the alternative, asking the questions "why is this child aligned with Parent A and rejecting Parent B?" and "what are the sources of the child's alignment with Parent A against parent B" invites consideration of the complete relationship ecology in which the child exists. These questions minimize bias and open

¹⁸Accessed 08.15.2022 at <https://www.ncjfcj.org/publications/afcc-and-ncjfcj-approve-statement-on-parent-child-contact-problems/>

conceptualization to the full range of relationship pressures and practical exigencies that are often associated with resist/refuse dynamics.

It is important that this discussion not recreate the false binary distinctions associated with the FFM. For all of its weaknesses, the FFM is a step in the direction toward standardizing and validating family law professionals' assessment processes. In this sense, the FFM and the Ecological Model are by no means mutually exclusive opposites. With the benefit of careful reformulation and proper empirical support, the FFM could be incorporated into the Ecological Model, serving to help evaluators differentiate between two of the many factors that must be considered. At the same time, the Ecological Model needs constant refinement including consideration of factors not presently included and both qualitative and quantitative studies of its application. Thus, the goal is not to polarize family law professionals like so many divorcing parents, but instead to bootstrap our way forward together in support of the children whose best interests we are mutually committed to serve. A welcome by-product of this union would be greater consensus and cooperation amongst the professionals who are concerned with parent-child contact problems.

In at least one regard, Richard Gardner was right. He wrote about the difference between what he called "evaluators" and "validators." In his view, "validators use behavioral lists and 'consistent-with-abuse' reasoning" rather than engage in the genuine intellectual exercise necessary to conceptualize each unique family system (as quoted by Lorandos et al., 2013, p. 238). As family law professionals committed to serving the best interests of children, we must together resist the urge to become validators and instead commit to work together to become systemically-informed evaluators.

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References

- Ainsworth, M., & Wittig, B. (1969). Attachment and exploratory behavior of one year-olds in a strange situation. In B. Foss (Ed.), *Determinants of infant behavior IV* (pp. 111–136). Methuen.
- Association of Family and Conciliation Courts. (2010). *Guidelines for court-involved therapy*.
- Baker, A. J. (2020). Parental Alienation and empirical research. In D. Lorandos & W. Berent (Eds.), *Paternal alienation: Science and law* (pp. 207–253). Springfield IL: Charles C. Thomas Publisher, Ltd.
- Baker, A. J. L. (2005). Parent alienation strategies: A qualitative study of adults who experienced parental alienation as a child. *American Journal of Forensic Psychology*, 23(4), 41–63.

- Baker, A. J. L. (2018). Reliability and validity of the four-factor model of parental alienation. *Journal of Family Therapy*, 42(1), 100–118. <https://doi.org/10.1111/1467-6427.12253>
- Baker, A. J. L. (2020). Parental alienation and empirical research. In D. Lorandos & W. Bernet (Eds.), *Parental alienation: Science and law* (pp. 207–253). Charles C Thomas Publisher, Ltd.
- Baker, A. J. L. (2020). Reliability and validity of the four-factor model of parental alienation. *Journal of Family Therapy*, 42(1), 100–118.
- Baker, A. J. L., Burkhard, B., & Kelly, J. (2012). Differentiating alienated from not adult children: A pilot study. *Journal of Divorce and Remarriage*, 53(3), 178–193. <https://doi.org/10.1080/10502556.2012.663266>
- Baker, A. J. L., & Chambers, J. (2011). Adult recall of childhood exposure to parental conflict: Unpacking the black box of parental alienation. *Journal of Divorce & Remarriage*, 52(1), 55–76. <https://doi.org/10.1080/10502556.2011.534396>
- Baker, A. J. L., & Darnall, D. C. (2007). A construct study of the eight symptoms of severe parental alienation syndrome: A survey of parental experiences. *Journal of Divorce & Remarriage*, 47(1–2), 55–75. https://doi.org/10.1300/J087v47n01_04
- Baker, A. J. L., & Eichler, A. (2016). The linkage between parental alienation behaviors and child alienation. *Journal of Divorce & Remarriage*, 57(7), 475–484. <https://doi.org/10.1080/10502556.2016.1220285>
- Baker, A. J. L., Miller, S., Bernet, W., & Adebayo, T. (2019). The assessment of the attitudes and behaviors about physically abused children: A survey of mental health professionals. *Journal of Child and Family Studies*, 28(12), 3401–3411. Studies (no pagination specified). <https://doi.org/10.1007/s10826-019-01522-5>
- Baumrind, D. (2013). Is a pejorative view of power assertion in the socialization process justified?. *Review of General Psychology*, 17(4), 420–427. <https://doi.org/10.1037/a0033480>
- Bernet, W. (2020). The Five-Factor Model for the diagnosis of parental alienation. *Feedback*. 6 (Summer). 3–15.
- Bernet, W., & Freeman, B. W. (2013). The psychosocial assessment of contact refusal. In D. Lorandos, W. Bernet, & S. R. Sauber (Eds.), *Parental alienation: The handbook for mental health and legal professionals* (pp. 47–73). Charles C Thomas Publisher.
- Bernet, W., & Greenhill, L. L. (2022). The Five-Factor Model for the diagnosis of parental alienation. *Journal of the American Academy of Child & Adolescent Psychiatry*, 61(5), 591–594. <https://doi.org/10.1016/j.jaac.2021.11.026>
- Bernet, W., Gregory, N., Reay, K. M., & Rohner, R. P. (2018). An objective measure of splitting in parental alienation: The parental acceptance-rejection questionnaire. *Journal of Forensic Sciences*, 63(3), 776–783. <https://doi.org/10.1111/1556-4029.13625>
- Bernet, W., Gregory, N., Rohner, R. P., & Reay, K. M. (2020). Measuring the difference between parental alienation and parental estrangement: The PARQ-Gap. *Journal of Forensic Sciences*, 65(4), 1225–1234. <https://doi.org/10.1111/1556-4029.14300>
- Bernet, W., Rohner, R. P., & Reay, K. M. (2021). Rejecting the rejection of parental alienation: Comment on Mercer (2021). *Journal of Family Trauma, Child Custody & Child Development*, 18(3), 210–216. <https://doi.org/10.1080/26904586.2020.1856752>
- Bernet, William, von Boch-Galhau, Wilfrid, Baker, Amy J. L. and Morrison, Stephen L. (2010). 'Parental alienation, DSM-V, and ICD-11'. *The American Journal of Family Therapy*, 38: 2, 76–187.
- Birnbaum, R., & Alaggia, R. (2006). Supervised visitation: A call for a second generation of research. *Family Court Review*, 44(1), 119–134. <https://doi.org/10.1111/j.1744-1617.2006.00071.x>

- Boháček, M., & Farid, H. (2022). Protecting world leaders against deep fakes using facial, gestural, and vocal mannerisms. *PNAS Proceedings of the National Academy of Sciences of the United States of America*, 119(48), 1–3. <https://doi.org/10.1073/pnas.2216035119>
- Bowlby, J. (1969). *Attachment and loss: Attachment* (Vol. 1). Basic Books.
- Bowlby, J. (1973). *Attachment and loss: Separation* (Vol. 2). Basic Books.
- Bowlby, J., & Robertson, J. (1952). A two-year-old goes to hospital. *Proceedings of the Royal Society of Medicine*, 46(6), 425–427. <https://doi.org/10.1177/003591575304600603>
- Department of Health and Human Services. (2020). Child maltreatment 2020. Retrieved December 28, 2022 <https://www.acf.hhs.gov/sites/default/files/documents/cb/cm2020.pdf>.
- Drozdz, L. M., & Olesen, N. W. (2004). Is it abuse, alienation, and/or estrangement? A decision tree. *Journal of Child Custody: Research, Issues, and Practices*, 1(3), 65–106. https://doi.org/10.1300/J190v01n03_05
- Evans, R. (2022). The five Factor Worksheet. Retrieved December 28, 2022 <http://drbobevans.com/wordpress/wp-content/uploads/2022/09/Five-Factor-Model-Worksheet.pdf>.
- Fidler, B. J., & Bala, N. (2020). Concepts, controversies and conundrums of “alienation:” lessons learned in a decade and reflections on challenges ahead. *Family Court Review*, 58(2), 576–603. <https://doi.org/10.1111/fcre.12488>
- Fidler, B. J., Bala, N., & Saini, M. A. (2013). *Children who resist postseparation parental contact: A differential approach for legal and mental health professionals*. Oxford University Press. <https://doi.org/10.1093/acprof:oso/9780199895496.001.0001>
- Friedlander, S., & Walters, M. (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>
- Frissa, S., Hatch, S. L., Fear, N. T., Dorrington, S., Goodwin, L., & Hotopf, M. (2016). Challenges in the retrospective assessment of trauma: Comparing a checklist approach to a single item trauma experience screening question. *BMC Psychiatry*, 16(1). Article 20. <https://doi.org/10.1186/s12888-016-0720-1>
- Garber, B. D. (in press). A structured rubric for evaluating the many cybernetic factors that can contribute to parent-child contact problems (PCCP).
- Garber, B. D. (2004). Parental alienation in light of attachment theory: Consideration of the broader implications for child development, clinical practice and forensic process. *Journal of Child Custody*, 1(4), 49–76. https://doi.org/10.1300/J190v01n04_04
- Garber, B. D. (2011). Parental alienation and the dynamics of the enmeshed parent-child dyad: Adultification, parentification, and infantilization. *Family Court Review*, 49(2), 322–335. <https://doi.org/10.1111/j.1744-1617.2011.01374.x>
- Garber, B. D. (2019). For the love of Fluffy: Respecting, protecting, and empowering transitional objects in the context of high conflict divorce. *Journal of Divorce & Remarriage*, 60(7), 552–565. <https://doi.org/10.1080/10502556.2019.1586370>
- Garber, B. D. (2019). Sherlock Holmes and the case of resist/refuse dynamics: Confirmatory bias and abductive inference in family law. *Family Court Review*, 58(2), 386–402. <https://doi.org/10.1111/fcre.12478>
- Garber, B. D. (2021). The Dynamics of the Enmeshed Family System Ten Years Later: Family Court and contemporary understanding of adultification, parentification, and infantilization. *Journal of the American Association of Matrimonial Lawyers*, 34, 97–120.
- Garber, B. D., Prescott, D., & Mulchay, C. (2022). *The family law professional's field guide to high conflict litigation: Dynamics, not diagnoses*. American Bar Association.
- Gardner, R. (1989). Differentiating between bona fide and fabricated allegations of sexual abuse of children. *Journal of the American Academy of Matrimonial Lawyers*, 1.
- Gardner, R. A. (1998). *The parental alienation syndrome: A guide for mental health and legal professionals*. Creative Therapeutics.

- Gottlieb, L. (2020a). Expert opinion submitted to the Court IMO Lucier v. Lucier (Maine, BIDD-FC-17-252).
- Gottlieb, L. (2021). Amicus brief documenting that parental alienation is psychological child abuse. Retrieved December 2, 2022 https://www.turningpointsforfamilies.com/uploads/2/2/5/4/22545256/09-14-2022_amicus_brief_that_pa_is_child_abuse_for_fa.docx
- Hands, A. J., & Warshak, R. A. (2011). Parental alienation among college students. *The American Journal of Family Therapy*, 39(5), 431–443. <https://doi.org/10.1080/01926187.2011.575336>
- Harman, J. J., Kruk, E., & Hines, D. A. (2018). Parental alienating behaviors: An unacknowledged form of family violence. *Psychological Bulletin*, 144(12), 1275–1299. <https://doi.org/10.1037/bul0000175>
- Harman, J. J., Saunders, L., & Afifi, T. (2021). Evaluation of the turning points for families (TPFF) program for severely alienated children. *Journal of Family Therapy*, 44(2), 279–298. Advance online publication. <https://doi.org/10.1111/1467-6427.12366>
- Herman, S., & Freitas, T. R. (2010). Error rates in forensic child sexual abuse evaluations. *Psychological Injury and Law*, 3(2), 133–147. <https://doi.org/10.1007/s12207-010-9073-0>
- Hershkowitz, I., Fisher, S., Lamb, M. E., & Horowitz, D. (2007). Improving credibility assessment in child sexual abuse allegations: The role of the NICHD investigative interview protocol. *Child Abuse & Neglect*, 31(2), 99–110. <https://doi.org/10.1016/j.chiabu.2006.09.005>
- Hesse, E. (1999). The adult attachment interview: Historical and current perspectives. In J. Cassidy & P. R. Shaver (Eds.), *Handbook of attachment: Theory, research, and clinical applications* (pp. 395–433). The Guilford Press.
- Howard, S. (2021). A causal model of children’s vicarious traumatization. *Journal of Child & Adolescent Trauma*, 14(4), 443–454. <https://doi.org/10.1007/s40653-020-00331-z>
- Johnston, J. R., & Sullivan, M. J. (2020). Parental alienation: In search of common ground for a more differentiated theory. *Family Court Review*, 58(2), 270–292. <https://doi.org/10.1111/fcre.12472>
- Johnston, J. R., Walters, M. G., & Olesen, N. W. (2005). Is it alienating parenting, role reversal, or child abuse? A study of children’s rejection of a parent in child custody disputes. *Journal of Emotional Abuse*, 5(4), 191–218. https://doi.org/10.1300/J135v05n04_02
- Joshi, A. (2016, November). Parental alienation: Remedies (part two). *Michigan Family Law Journal*, 49(9), 6–12.
- Joshi, A. (2021). *Litigating parental alienation*. American Bar Association.
- 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>
- Laughrea, K. (2002). Alienated family relationship scale: Validation with young adults. *Journal of College Student Psychotherapy*, 17(1), 37–48. https://doi.org/10.1300/J035v17n01_05
- Lorandos, D., Bernet, W., & Sauber, R. (2013). Overview of parental alienation. In D. Lorandos, W. Bernet, & S. R. Sauber (Eds.), *Parental alienation: The handbook for mental health and legal professionals* (pp. 5–46). Charles C Thomas Publisher.
- Lyon, T. D., Stolzenberg, S. N., & McWilliams, K. (2017). Wrongful acquittals of sexual abuse. *Journal of Interpersonal Violence*, 32(6), 805–825. <https://doi.org/10.1177/0886260516657355>
- Maaskant, A. M., van Rooij, F. B., Bos, H. M. W., & Hermanns, J. M. A. (2016). The wellbeing of foster children and their relationship with foster parents and biological parents: A child’s perspective. *Journal of Social Work Practice*, 30(4), 379–395. <https://doi.org/10.1080/02650533.2015.1092952>

- Mercer, J. (2021). The Baker strategies questionnaire and decisions about reunification. *Journal of Family Trauma, Child Custody & Child Development*, 20(1), 3–19. <https://doi.org/10.1080/26904586.2021.1960231>
- Planalp, E. M., Van Hulle, C. A., & Goldsmith, H. H. (2019). Parenting in context: Marital adjustment, parent affect, and child temperament in complex families. *Journal of Family Psychology*, 33(5), 532–541. <https://doi.org/10.1037/fam0000511>
- Polak, S., & Saini, M. (2015). Children resisting contact with a parent postseparation: Assessing this phenomenon using an ecological systems framework. *Journal of Divorce & Remarriage*, 56(3), 220–247. <https://doi.org/10.1080/10502556.2015.1012698>
- Polak, S., & Saini, M. (2019). The complexity of families involved in high-conflict disputes: A postseparation ecological transactional framework. *Journal of Divorce & Remarriage*, 60(2), 117–140. <https://doi.org/10.1080/10502556.2018.1488114>
- Rothbart, M. K., & Bates, J. E. (2006). Temperament. In N. Eisenberg, W. Damon, & R. M. Lerner (Eds.), *Handbook of child psychology: Social, emotional, and personality development* (pp. 99–166). John Wiley & Sons, Inc.
- 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>
- Saini, M., Johnston, J. R., Fidler, B. J., & Bala, N. (2016). Empirical studies of alienation. In L. Drozd, M. Saini, & N. Olesen (Eds.), *Parenting plan evaluations: Applied research for the family court* (pp. 374–430). Oxford University Press.
- Saini, M., Newman, J., & Christensen, M. (2017). When supervision becomes the only plan: An analysis of long-term use of supervised access and exchange services after separation and divorce. *Family Court Review*, 55(4), 604–617. <https://doi.org/10.1111/fcre.12307>
- Sroufe, L. A., Egeland, B., Carlson, E. A., & Collins, W. A. (2005). *The development of the person: The Minnesota study of risk and adaptation from birth to adulthood*. Guilford Publications.
- Suresh Kumar, P. N., Subramanyam, N., Thomas, B., Abraham, A., & Kumar, K. (2005, Jul). Folie à deux. *Indian Journal of Psychiatry*, 47(3), 164–6. <https://doi.org/10.4103/0019-5545.55942>
- Wallerstein, J. S., & Kelly, J. B. (1980). *Surviving the breakup*. Basic.
- Walters, M. G., & Friedlander, S. (2016). When a child rejects a parent: Working with the intractable resist/refuse dynamic. *Family Court Review*, 54(3), 424–445. <https://doi.org/10.1111/fcre.12238>

Appendix A

A summary of the six domains that must all be considered when working to understand resist/refuse dynamics. Reprinted with permission from Garber, B.D. (in press, 2023). A structured rubric for evaluating the many convergent factors that can contribute to parent-child contact problems (PCCP). *Family Court Review*.

(1) **Incidental sensory, temporal, and proximal variables: Is the child's apparent resistance/refusal of parent B associated with her subjective experience of otherwise incidental and immediate variables?**
 At issue are those circumstances relevant to the child's resist/refuse behaviors that are subjectively aversive, recent, and/or nearby. The child may not be aware of these factors and/or may not be able or willing to voice them. These include as examples transitions between care environments that interrupt preferred activities, that occur in a setting that the child finds embarrassing (e.g., at school in front of peers), and/or between environments with distinct and/or unfamiliar and/or subjectively aversive sensory experiences (e.g., unfamiliar smells, noises).

Questions	Relevant Considerations
(a) Is the child's resistance recent and abrupt or chronic? If the former, what were the relevant proximal factors? If chronic, are there exceptions that might provide clues to overcoming resistance in the future? (b) Is the child's resistance event- time- or place-specific? What are the qualities of the physical environment, time of day, day of week, concurrent activities, persons present, the child's physical state (e.g., fatigue, hunger, clothing) and health associated with resistance? (c) Is the child's resistance associated with access to peers, siblings, step- and half-siblings? ¹⁹ (d) Is the child's resistance related to her negative experience with or expectations about a third party or animal associated with Parent B (e.g., new partner, neighbor, pet)? (e) Is the child's resistance related to sensory (i.e., visual, olfactory, auditory, tactile, and/or gustatory) experiences at transition or anticipated in Parent B's care that may be subjectively familiarity, aversive or overwhelming?	(i) Children who are emotionally immature, impulsive, and/or anxious are more likely to react to incidental temporal and proximal variables without consideration of consequence. (ii) Does changing the time or place or conditions of transition reduce the child's resistance? (iii) Does changing the time or place or conditions of contact with Parent B (e.g., not going back to Parent B's apartment; assuring that no one else will be present when Parent B and child are together) reduce resistance? (iv) Have the child describe what she sees, hears, smells, tastes, touches, and feels in each caregiving environment. (v) Use the Query Grid (Garber, 2007) in interview to explore the child's subjective experience of each home and caregiver. (vi) Determine how media, diet, peer, and other resource access differs between environments and how the child perceives these differences. (vii) Would contact with the absent parent/sibs/friends via distance media reduce the child's resistance? Would transitional objects diminish resistance (Garber, 2019)? (viii) Would simple changes of sensory experiences (e.g., adopting a familiar fabric softener, nightlight, or a familiar brand of peanut butter) reduce the child's resistance?

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¹⁹ . . . children might rather stay at one parent's home not because they have an alignment toward that parent. but because their friends or significant other lives in the neighborhood. This is especially important for children who attempt to remove themselves from any ongoing parental conflict by spending more time with friends." (Polak and Saini, 2015, p. 237).

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(2) Child-specific variables. What characteristics of the child's developmental status, temperament, personality, relative strengths and weaknesses, and experience are associated with her apparent contact resistance/refusal?

At issue are qualities about the child herself that may be relevant to understanding apparent resist/refuse behaviors.²⁰ These variables are likely to impact the child's functioning in other settings not related to the parents' conflict or her transition between care environments. As examples these include differences of temperament, activity level and attention, history of trauma, social skills, and physical health. The latter can be as simple as being reassured that Parent B is aware of and prepared to help manage the care of the physical health need (e.g., menstruation, asthma, diabetes, medication administration).

Questions	Relevant Considerations
(a) Is the child's resistance associated with temperament (e.g., rigidity, fragility, dependence; Planalp et al., 2019; Rothbart and Bates, 2006)?	(i) How does the child understand the adult separation and the schedule of care? Does she understand and accept how long she will be in each parent's care? Would visual props in each home (e.g., a color-coded wall calendar)? Help?
(b) Does the child resist change, transition, and/or separation across contexts (i.e., not exclusively when transitioning between care environments)?	(ii) Does the child generally manage change, transitions, and spontaneity well? What qualities of make some transitions easier than others and how can they be adapted to transitions between care environments?
(c) Is the child's resistance due to diagnosed/ diagnosable social, emotional, behavioral, cognitive differences and/or physical disability?	(iii) Does the child have a history of trauma that is triggered at transition or by association with either separating from Parent A or joining Parent B?
(d) Is the child's resistance due to a history of trauma not exclusively associated with either adult?	(iv) Does the child resist transition through an impartial third party or institution (e.g., school) when both parents are not simultaneously present?
	(v) Are the child's responses about these variables the same across multiple interviews at different times of day, on different days of week, in the company of different adults, and in different physical settings?
	(vi) School records, evaluations, and accommodation plans and/or psychological evaluation of the child may be relevant.

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²⁰"The children's temperaments impact the parenting dynamic. The children are not inanimate, stoic, or passive robots. They are maturing adolescents who interpret the world around them through the individual lens of their developmental stage, lived experience, and personality" KG v. HG, 2021 Nova Scotia Supreme Court 43 at item 69.

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(3) Parent A-Child dyadic variables. What characteristics of the Parent A-child relationship contribute to the child's resistance/refusal of Parent B?

At issue is the quality of the child's relationship with aligned Parent A. This is a dyadic variable in that it asks about the parent-child relationship itself, *not* the qualities of either individual. It concerns the child's subjective security in relationship with Parent A as a direct result of her experience with Parent A. For example, does the child anticipate that Parent A will be sensitive and responsive to her needs?²¹

Questions	Relevant Considerations
(a) Is the child's resistance due to a relationship affinity appropriate to the child's experience, development, and culture? ^{22,23}	(i) Affinities emerge between parents and children normatively over the course of development often around shared characteristics, skills, interests, and/or needs.
(b) Is the child saying and doing what the Parent A needs to hear and see in order to maintain love and/or avoid anger and rejection? Does the child respond in a similarly chameleon-like manner with others?	(ii) If affinity between Parent A and the child is relevant, would Parent B's adoption of the same quality, activity, or skill diminish resistance/refusal?
(c) Is the child's resistance associated with Parent A's threats, promises, and/or bribes as in "If you don't tell the evaluator you want to live with me I'll kill myself" ²⁶ or "If you tell the GAL you want to live with me I'll get you a car."	(iii) The chameleon child says and does what she believes her listener wants to see and hear in order to avoid rejection, anger, conflict, and/or loss of love (Garber, 2014). Beware that her disparate reports often fuel antagonistic parties' confirmational biases. Reassurance and child or family therapy may help.
(d) Does the child resist all separations from Parent A but manages separations from others?	(iv) Beware that enmeshment and alienation are independent dynamics contrary to some assertions that enmeshment is a feature or byproduct of alienation. ²⁴
(e) Enmeshment: Are the interpersonal boundaries between Parent A and the child appropriate to the child's developmental capacities and the ambient culture? ²⁷ Is the child adultified, parentified, and/or infantilized in this relationship?	(v) If parent A is directed to more appropriate adult resources, does that free the child to resume childhood and diminish resist/refuse of Parent B?
(f) Do Parent A and the child share extreme and delusional beliefs suggestive of <i>folie à deux</i> (Johnston and Sullivan, 2020)?	(vi) Enmeshment can feel very rewarding to a child creating disincentive for change. (vii) <i>Folie à deux</i> is not a DSM 5 diagnosis. It is a very rare and extreme pathology requiring intense psychiatric evaluation and intervention (Suresh Kumar et al., 2005 ²⁵).

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²¹Both dyadic domains (that is, the Parent A-child relationship discussed in 3 and the Parent B-child relationship discussed in 4 correspond to attachment security as discussed by Sroufe et al. (2005) and as assessed by attachment measures in the general population when the child is between 18 and 48 months, noting that these otherwise very reliable and valid measures are not appropriate to this population or older children (Garber, 2009).

²²Friedlander and Walters (2010): "A child's proclivity or affinity for a particular parent is a normal developmental phenomenon and can be related to temperament, gender, shared interests, identification with a parent's physical and psychological attributes, the parenting style of a particular parent, and also attachment security with one parent." We note further that when affiliation is active, the child may appear to be rejecting the non-affiliated parent.

²³"A child may feel more emotionally connected with one parent than the other because they have similar interests (e.g., sports or art) or similar personality styles" (Drozd & Olesen 2004, p. 74).

²⁴"Enmeshment -lack of proper boundary between a parent and the child – is simply one behavior of the alienation dynamic" (Joshi, 2016, p. 6). However: "Dr. Baker noted that enmeshment can occur without parental alienation being present, although it can be a possible indicator of alienation" (C.J.J. v. A.J., 2016 BCSC 676 at item 250)

²⁵"The mother harbored strong persecutory delusions against her husband and his relatives. She accused her husband of frequently visiting her son in school, and abusing and torturing him physically ... The child also harbored similar delusions and, in a separate interview, he too narrated the same story as his mother and showed the 'scar marks'" (Suresh Kumar et al., 2005 p. 165.

²⁶"[Mother] " ... told the oldest son that she was considering suicide if she lost custody of the two boys." (Jordana v. Corley, 220 N.W.2d 515, North Dakota, 1974.

²⁷"... [T]he child has had developmentally inappropriate difficulty separating from the parent ... Often the child in these cases is highly attuned to the enmeshed parent's neediness and dependence and assumes responsibility for protecting the parent. The child and parent are rarely aware of what is going on and believe that they share an excellent relationship" (Friedlander & Walters, 2010 p. 105.)

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(4) **Parent B-Child dyadic variables. What characteristics of the Parent B-child relationship contribute to the child's resistance/refusal of Parent B?**

At issue is the quality of the child's relationship with rejected Parent B. This is a dyadic variable in that it asks about the parent-child relationship itself, *not* the qualities of either individual. It concerns the child's subjective security in relationship with Parent B as a direct result of her experience with Parent B. For example, does the child anticipate that Parent B will be sensitive and responsive to her needs?

Questions	Relevant Considerations
<p>(a) Did the child ever have a relationship of any sort with Parent B?</p> <p>(b) Does the child experience Parent B's behavior, language, habits, beliefs, or activities as foreign, unacceptable, or embarrassing?</p> <p>(c) Estrangement: Has the child directly experienced Parent B as insensitive, unresponsive, abusive, or neglectful toward her?²⁸</p> <p>(d) Estrangement: Has the child directly experienced Parent B as insensitive, unresponsive, abusive, neglectful, destructive or threatening toward others (i.e., vicarious exposure) including animals and objects exposure.g., domestic violence, intimate partner violence)?²⁹</p> <p>(e) If the child has direct or vicarious negative experiences associated with Parent B, do these constitute trauma that trigger extreme anticipatory anxiety, dissociation, flashbacks, resistance and/or refusal of contact?</p>	<p>(i) Anger, confusion, resentment, and torn loyalties can complicate beginning a relationship with a never-met Parent B particularly as the child grows toward adolescence.</p> <p>(ii) Individual adult variables are identified in the rubric only to the extent that they bear on relationship variables. For example, a parent's substance abuse is irrelevant unless and until it bears on the parent-child relationship.</p> <p>(iii) Cultural, language, dietary, and religious differences (among many such variables) can contribute to a child's discomfort, confusion, embarrassment, and resistance or rejection of Parent B.</p> <p>(iv) Evaluate Parent B's risk of objective harm to and around the child. Beware that the child's vicarious exposure to Parent B's inappropriate acts can motivate resistance even when the child herself is safe (Kelly & Johnston, 2001).</p> <p>(v) When the child's contact with Parent B is or has been supervised, how does the child understand why the supervisor is/was present? How if at all was that explanation scripted and by whom? Does the child's understanding contribute to negative attribution about/diminished security with Parent B (Birbaum and Alaggia, 2006; Saini et al., 2017)?</p>

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²⁸Note that estrangement as operationalized in items 4(c) and (d) is a dyadic variable. That is, it emerges in the context of the Parent B-child relationship with no necessary contribution from Parent A. By contrast, alienation as discussed in 5 (f) and (g) is a systemic variable. That is, alienation requires consideration of the roles of both parents and the child.

²⁹"Some rejected parents are rigid, controlling and somewhat harsh, and have a chronically distant parenting style; some are passive; others are immature or narcissistic and have difficulty being attuned to the child's feelings and needs; while still others have problems managing their anger and disappointment" (Friedlander & Walters, 2010, p. 106).

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(5) Systemic variables. What characteristics of the relationship among Parent A, Parent B and child(ren) contribute to the child's resistance/refusal of Parent B?

At issue is the child's experience of the relationship between the two adults obtained via direct observation and/or as communicated by either adult or a third party about the adult relationship. This is a systemic variable in that it asks about the quality of the three interwoven relationships, not the qualities of any individual or subsidiary dyad. It concerns the child's subjective security in relationship with each parent as a direct result of her direct experience with each of them and the direct and indirect verbal, emotional, and behavioral messages that she receives from either about the other.

Questions	Relevant Considerations
(a) Is the child's resistance to Parent B associated with an avoidance of the (emotional, verbal, and/or behavioral) conflict that erupts when the two adults are face-to-face?	(i) Children who experience conflict between their parents reasonably fear and act to avoid being present when the parents are together. Many of these children blame themselves for the adult conflict.
(b) Is the child's resistance to Parent B an effort to avoid "culture shock" (Garber, 2016)?	(ii) Children who experience very disparate care environments and particularly those who are required to transition frequently between such homes reasonable resist transitions as too emotionally and cognitively stressful (i.e., "culture shock").
(c) Does the child experience the culture in one home as more aversive than the other? For example, teenagers may gravitate toward a permissive parent's home and away from an authoritarian's parent's home.	(iii) Beware that parents can create an implicit "bidding war" for the child's time and affections particularly when the child has a voice in her schedule of care. This can cause parents to gradually abandon healthy parenting structures (rules, limits, boundaries) so as to entice the child away from the other parent.
(d) How has each parent scripted the adult separation, the adult conflict, and the other parent's role in the child's life for the child?	(iv) Ask the child explicitly how she understands the separation, the conflict, where this information comes from, and what each parent has told her about the other.
(e) How does the child interpret Parent A's non-verbal (e.g., vocal tone, body language) reactions to Parent B?	(v) Any adult's pressure (e.g., bribery, threats) is a selfish and destructive act that speaks to that person's willingness and ability to put the child's needs first.
(f) Is the child escaping the adult conflict by arbitrarily picking sides? ³⁰	(vi) Assess parenting styles using Baumrind's typology (e.g., Baumrind, 2013): permissive, disengaged, authoritative, authoritarian.
(g) Alienation: Is this child's resistance/refusal of Parent B associated with her exposure to Parent A's (direct or indirect; intended or incidental) negative words, behaviors, and/or emotions about Parent B? This includes Parent A's effort to enroll the child as her spy, courier, or go-between to the extent that these actions communicate that Parent B is not safe or trusted.	(vii) Beware that parents' competitions to win a child's time and affections can take many forms, not just leaning toward permissiveness. As examples, some children value greater authority and stricter limits, greater emphasis on diet, health, academic performance or sports.

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³⁰"The child who has rejected one parent no longer has to navigate the emotional minefield between the two parents and does not have to risk losing the one parent that they have come to believe they need the most, or the parent they feel needs them the most. The avoidant response is adaptive for the child as it achieves security and relative peace, albeit at the high price of losing a relationship with the rejected parent" (Friedlander & Walters, 2010, p. 101).

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(6) Extra-Systemic variables. What relationship dynamics and/or practical pressures outside of the family system bear on understanding and resolving the child's polarized position within the family system?

At issue are the child's secondary relationships (e.g., extended family, neighbors, friends, teachers, coaches, clergy) and those exigencies (e.g., co- and extra-curricular commitments; travel time between homes; access to resources local to each home) that can contribute to PCCP and be misattributed to one or the other parent's misdeeds. The likely significance and scope of these variables increases as the child ages toward autonomy and begins to invest emotionally outside of family.

Questions	Relevant Considerations
<p>(a) Who among the child's full range of relationships is directly or indirectly influencing the child's emotions and behavior?</p> <p>(b) Have the child's professional helpers (e.g., therapist, school counselor, prescribers) become siloed such that they are (implicitly) contributing to the child's polarized position? (see AFCC, 2010).</p> <p>(c) What real or imagined activities and/or social commitments does the child fear s/he will miss if absent while in the other parent's care? What consequences does the child fear will be associated with any such absence?</p> <p>(d) How if at all is the child identified with his/her peer group and fears rejection, criticism, embarrassment if absent while in the other parent's care?</p> <p>(e) What is the child's experience of other families' divorces? Does the child perceive alignment with one parent and rejection of the other to be normative? Acceptable? "Cool"?</p>	<p>(i) Keep in mind that the child's "full range of relationships" likely includes people who are seldom or never physically present as when distant relatives communicate via media and when unfamiliar people communicate via social media, gaming platforms, and internet channels.</p> <p>(ii) How if at all have other adults (e.g., grandparents, uncles, aunts, step-parents) aligned with Parent A or Parent B and are exerting emotional or practical pressures even if the parent is unaware?</p> <p>(iii) Does the child have any peer and/or media models of healthy relationships with both parents when apart?</p>