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A structured rubric for evaluating the many systemic variables that can contribute to parent-child contact problems (PCCP)

Benjamin D. Garber, Ph.D.

Family Law Consulting PLLC

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Contact: bdgarberphd@familylawconsulting.org

Abstract

Parent-child contact problems (PCCP) are among the most vexing and intractable matters encountered in contemporary divorce and post-divorce litigation. These complex and incendiary family dynamics can confound even the most experienced evaluators, investigators, and jurists, fueling opposing confirmational biases, and sparking a destructive tug-of-war between the aligned parent's allegations of abuse and the rejected parent's allegations of alienation. This article describes all such either/or binary arguments as misleading, contrary to the science, and harmful to children. Rather than cast alienation and estrangement as mutually exclusive alternatives, the systemically-informed professional must consider more than a dozen mutually compatible practical exigencies and relationship dynamics which can converge to cause a child to align with one parent and resist or refuse contact with the other. Together, these variables are described as constituting an ecological model of the conflicted family system. A rubric is proposed to standardize evaluation across time, children, families, and jurisdictions, minimize bias, facilitate more comprehensive evaluations, optimize the efficacy of associated interventions, and invite more rigorous future research.

A structured rubric for evaluating the many systemic variables that can contribute to parent-child contact problems (PCCP)

"…even if there is proof [of] 'rejection' (lack of access by a parent), that fact alone does not lead to the conclusion of alienation."

J.F. v. D.F. 61 Misc 3rd 1226(A) NY

The pressures that can cause a child to align with one parent and resist or refuse contact with the other parent have existed as long as families have existed.[1] These parent-child contact problems (PCCP) were of little concern when the law dictated that children were simply and exclusively the property of their father like so many cattle (Wyer et al., 1987) or more recently, when the law determined that children belonged in the care of their mothers' uniquely tender care (DiFonzo, 2014). It is only in the last seventy years with the growing endorsement of the Best Interests of the Child (BIC) standard that PCCP has begun to be a focus of study.

In the 1980s and 1990s, psychiatrist Richard Gardner adapted the British Common Law concept of alienation of affections to explain PCCP (Gardner, 1987, 1992, 1998, 2001). Gardner promulgated the Parental Alienation Syndrome (PAS), a novel diagnosis intended to describe the child's alignment with Mother and rejection of Father due to the child's experience of Mother's

[1] Recall that the Old Testament describes Rebekah aligning with her son, Jacob, against her husband, Isaac (see for example Genesis 25-27).

unwarranted damning words, actions, and/or expressed emotions about Father. Gardner's allies advocated in the early 2000s for inclusion of PAS or its indistinguishable first cousin, Parental Alienation Disorder (PAD), in the American Psychiatric Association's revision of the Diagnostic and Statistical Manual (DSM 5; American Psychiatric Association, 2013) (Bernet, 2010). These efforts failed in part because the scientific community understood that it is illogical and unscientific to reason backwards from an observable outcome (that is, the child's polarized position aligned with Parent A and rejecting Parent B) to infer causation (Parent A's allegedly alienating behaviors).[2]

The dangers inherent in so-called backwards reasoning are universal. Consider, for example, the geneticist asked to explain a child's chronic illness. Clinical presentation or phenotype is commonly the result of multiple, interacting underlying causes including numerous possible genotypes.[3] To infer causation from clinical presentation alone is to risk doing harm. In the geneticist's case, the risk is prescribing the wrong medication or intervention. In the case of PCCP, an inaccurate attribution of causation can permanently damage a child's relationship with one or both parents with a host of developmental, social, and emotional sequelae. The geneticist knows and family law must similarly determine that clinical presentation is, at best, reason to generate multiple hypotheses in need of further investigation.

Early in the beginning of this century, the concept of alienation as applied to family law began to diverge along two distinct paths much the same way that languages diverge when subgroups of

[2] Note that advocates of the PAS and PAD position now commonly argue that alienation is captured in the DSM 5 under the non-diagnostic ("Other conditions that may be a focus of clinical attention") labels Child Affected by Parental Relationship Distress (V61.29) and/or Child Psychological Abuse (V61.21).

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

speakers relocate to different environments (Honkola et al., 2018). Over time, the two distinct evolutionary paths yield two very distinct outcomes grown from the same root.

The path taken by many of those who had formerly advocated for PAS as a DSM diagnosis has changed very little over time. Although references to "syndrome" and "disorder" have largely gone extinct,[4] these professionals continue to advocate for a facsimile of Gardner's PAS modified and purportedly validated by Amy Baker and colleagues (e.g., Baker and Darnall, 2006, 2007). In this view, "…when abuse or neglect have not occurred, it is highly probable—to 99% clinical certainty— that alienation is the cause of the rejection."[5] This approach notably remains entirely devoid of consideration of any variable besides alienation and its supposedly mutually exclusive opposite, estrangement.

This is not to say that these former PAS advocates have ignored the science evolving around them. In apparent deference to the emergence of contemporary multi-factorial approaches to PCCP, the binary approach was first parsed to become a four-factor model (Baker, 2018) and more recently sliced even more finely to be presented as a five-factor model (Lorandos & Bernet, 2020). By either name, it remains the same either/or alienation v. estrangement formulation.

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

1. The child refuses contact with Parent B.

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

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

2. The child once had a "positive relationship" with Parent B.

3. Parent B has not been found to be abusive or neglectful

4. Parent A is identified as having engaged in "alienating behaviors"

5. The child is manifesting behaviors associated with parental alienation.

As appealing as this model may be to custody litigants' confirmational biases[7], zealous advocates' win-lose mentality, and the adversarial court system, it is fatally flawed by its illogical and counter-intuitive insistence on inferring cause from effect (Garber, 2019a; Joyce, 2019; Garber, in review). It defines alienation and estrangement as the only possible causes of PCCP and forces one to either ignore all other possible contributing variables or to artificially construe those other factors as features of one of these two exclusive dynamics. Consider, for example, a New York court's experience with the binary model: "When questioned about whether a child might want to spend more time with one parent - without any alienation existing - the expert again evaded an answer, testifying 'it's remotely possible' and adding "I have not seen it'"[8]

A second group of family law professionals diverged early this century from those who continued to carry the PAS/PAD banner. These professionals took a wider view of the causes of PCCP, initially acknowledging the cybernetic roles of alienation, estrangement, and enmeshment in the form of a "hybrid" model (Fidler et al., 2019; Friedlander and Walters, 2010; Walters and Friedlander, 2016).

[7] "… rejected parents will often react to their children's behavior in ways that reinforce the exaggerated or distorted negative image that the child holds of them, thereby giving credence to that negative image and strengthening the child's tendency to avoid" Friedlander and Walters 2010 p. 104

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

Perhaps the most important lesson learned from this era is the error of approaching PCCP by asking the leading question, "Is this alienation?" Anchoring and confirmational biases (among others) prompt responses focused on alienation that can blind evaluators, advocates, and courts to other complementary and competing hypotheses.[9] Far more valid and meaningful is the open-ended question, "What factors are contributing to the child's polarized position?"

Once PCCP began to be discussed as a complex, multifactorial recipe rather than as an either/or zero-sum blame game[10], it became possible to conceptualize the full scope of the child's relationship ecology. This invited evaluators to consider contextual variables such as each parent's home environment and neighborhood, the role of secondary and tertiary relationships (e.g., siblings, step-parents, grandparents, peer groups), developmental variables such as normal separation anxiety and parent-child affinity, the child's chameleon-like efforts to adapt to disparate environments, and those more pathological and pathogenic relationship pressures including alienation, estrangement, and enmeshment (Garber, 1996, 2019; Garber et al., 2022b; Polak and Saini, 2015). Courts have responded in kind, handing down more nuanced rulings. For example: "There are multiple reasons for the strained relationship between the father and the children. I find, however, that the primary cause is connected to the father's behaviour and lack of insight. The second cause is related to the mother's behaviour. The third cause is related to the children's temperaments."[11]

[9] "… precursors to the child's rejecting behavior towards one parent may … be obscured if there is a focus on or a search solely for evidence of one parent's postdivorce alienating behavior or the other parent's abusive Behavior" Friedlander and Walters 2010 p. 108

[10] "… we must remember that the best interests of the child simply must come first. The moral blameworthiness of the alienating parent's conduct has nothing to do with the course of action that is in the child's best interests" (Boyd, 2015, p. 2).

[11] KG v. HG, 2021 Nova Scotia Supreme Court 43

The divergent evolution of the alienation construct in family law leaves us today with two distinct and conflicting perspectives on PCCP: A small but vocal minority who advocate for a binary approach sometimes referred to as a four- or five-factor model and a larger group that advocates for an ecological approach. At issue is not the existence of alienation as some have suggested (Lorandos, 2020), although the phenomenon must be understood as a relationship dynamic that can arise between people rather than as a syndrome or illness that can arise within a child (Garber et al., 2022). At issue, instead, is our ability and willingness to look beyond simple and appealing either/or, black/white arguments to wrestle with the full complexity of human relationships.[12]

The data

Empirical studies of PCCP are few and far between, in part because of the practical challenges inherent in defining and obtaining randomized samples, defining and obtaining control groups, high attrition rates, and custody litigants' concerns about discovery and disclosure of research data undermining their legal arguments (Garber, 2020; Milchman et al., 2020; Robb, 2020).

The greatest number of relevant, published studies take a very narrow view of PCCP by exclusively examining questions about alienation (Harman et al., 2022). This is likely due in part because the concept of alienation has a fifty-year history in family law while the alternative ecological model is much newer to the field. It is also likely due to the fact that binary questions are more easily asked and answered, while open-ended inductive inquiries are much more conceptually and procedurally challenging.

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

An impressive 2016 review of alienation studies noted a significant absence of consensus among researchers defining terms, crippling methodological difficulties undermining purported conclusions, and a paucity of reliable and valid measurement instruments. The review identified an overwhelming need for research seeking to "… reliably distinguish alienation from other types of strained parent–child relationships, and to determine the most appropriate responses to individual cases." The authors observed that, "[t]he field has often simplified the complexities of parental alienation with insistence that either an alienating parent or an abusive one caused children to reject a parent. The problem with absolute thinking is that the complexity of potential factors influencing outcomes, both positively and negatively, is missed" (Saini et al., 2016, p. 378).

Conceptually, alienation studies are circular and deductive. They posit the effect and then proceed to collect data that appear to validate it without first considering alternative and mutually compatible variables (e.g., Baker and Darnell, 2006, 2007; Baker and Verrocchio, 2013; Baker and Chambers, 2011; Ben-Ami and Baker, 2012). In particular, these studies hypothesize and then purport to confirm that if a rejected parent is neither abusive nor neglectful, then the child's polarized alignment must be due to the aligned parent's alienating behaviors.

Unfortunately, many readers and some courts fail to look further. They endorse these conclusions without understanding the flaws in their conceptual and procedural foundations. In fact, these studies commonly rely upon non-random and self-selected samples -often rejected and vindictive fathers- without control groups or anchoring norms. They report data collected from single sources -often parents who self-identify as having been alienated from their children- without establishing independent and impartial corroboration of those accounts. Their findings are therefore extremely vulnerable to both researchers' and participants' confirmational biases,

misleading to those who endorse them, and risk doing harm when brought to bear on the lives of children.

By contrast, a second set of studies eschews the binary model and a deductive approach in favor of an inductive approach, asking open-ended questions in search of the multiple relationship dynamics and practical conditions associated with PCCP outcomes. These studies (e.g., Fidler et al., 2019; Walters and Friedlander, 2010, 2016), although fewer in number, tend to be both conceptually and procedurally more robust. Participant families are typically identified via court records rather than by self-report. The variables measured are defined by judicial rulings and impartial third-party evaluators. Although these studies also lack control groups, can only assert associations -not causation- between variables and suffer the statistical disadvantages associated with from small sample sizes, they routinely identify alienation and estrangement as two among three or more mutually compatible and commonly interwoven variables associated with PCCP.

Parent-child enmeshment is the third variable commonly associated with PCCP. Enmeshment describes a developmentally and culturally atypical failure of boundaries between parent and child. Given that "[i]n the healthy course of development, the child's sense of a bounded and separate identity grows from the infant's oceanic sense of self toward adolescent rebellion and peer group affiliations into the faux autonomy of young adulthood, only then to be blurred again by love and marriage and parenting" (Garber, 2021, p. 100; see also Garber, 2011), enmeshment is a pathological breach of boundaries that can undermine the child's healthy development.

As early as 2005, Johnston and colleagues recognized, "… a multi-factor explanation of children's rejection of a parent with both the aligned and rejected parents contributing to the problem, together with role reversal in parent-child relationships" (p. 191). Research grown out of this hybrid model has since yielded the observation that "… uncomplicated or pure cases of

alienation in which neither estrangement nor enmeshment were identified as playing a significant role, were relatively infrequent…." (Friedlander and Walters, 2010, p. xxxx). [13]

This multifactor understanding of PCCP remains current and motivates the development of the evaluation rubric presented below. To wit: "It is widely acknowledged that [parent-child contact problems; a.k.a., resist-refuse dynamics] cases are most fruitfully understood from a multi-factorial perspective. While some cases may be totally the 'fault' of one parent (a parent perpetrating violence or abuse, or a parent exhibiting alienating behavior), in many situations both parents bear some responsibility: focusing on a single cause is rarely helpful" (Fidler & Bala, 2020, p. 576). Indeed, two of the world's most powerful family law professional organizations very recently joined together to advise that,

"Children are at greater risk when parent-child contact problems are not effectively addressed and when family law professionals and others echo and intensify the polarization within the family. This problem may be exacerbated by … gendered and politicized assumptions that either parental alienation or intimate partner violence is the determinative issue" (15 August, 2022 by the Association of Family and Conciliation Courts (AFCC) and the National Council of Juvenile and Family Court Judges)

A rubric organizes and standardizes the evaluation of PCCP

A rubric is a standardized means of organizing potentially overwhelming data and optimizing full consideration of multiple constituent elements. It fulfills the forensic evaluator's acknowledgement that "[o]rganizational tools such as checklists, timelines, concordances, and

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

activity logs may often be helpful in highlighting inconsistencies and holes in the data" (Erard, 2016, p. 277).

In general, rubrics function like checklists. They structure executive processes so as to assure that a particular task is approached fully and with a minimum of bias, thereby enhancing the accuracy of judgment (Krebs et al., 2022). Rubrics minimize premature closure by requiring that successive options are all adequately considered (Emery et al., 2016). The United States Departments of Agriculture's dietary guidelines is one well-known rubric[14]. The graduation criteria in any high school or college are another. In each case, rubrics identify constituent categories or domains that must be checked off in order to adequately consider the whole.

Medicine commonly relies on rubrics for training, diagnosis, and treatment (e.g., National Health Council, 2019). For example, physicians' evaluations of medical students' work have been shown to be significantly more reliable when based on a single scoring rubric (Cyr et al., 2014).

Rubrics are quite common in psychology, although seldom referenced in the family law literature specifically. They have been proposed as a means of standardizing and improving editorial peer review (Howard et al., 2021), guiding student research efforts (Boysen et al., 2020), and assessing new child welfare workers' competence (Havig et al., 2020). Educators and educational psychologists have established rubrics to standardize classroom observations (Allison et al., 2022), to conduct reading assessments (Roduta et al., 2022), and for the identification of at-risk students (Burkhardt et al., 2021). "Although under certain circumstances (e.g., strict time constraints) rubrics might induce stress and pressure and thus hinder task performance, overall meta-analyses and narrative reviews clearly indicate beneficial effects of

[14] See https://www.dietaryguidelines.gov/sites/default/files/2021-03/DGA_2020-2025_ExecutiveSummary_English.pdf.

rubrics on the application of self-regulated learning strategies, self-efficacy, motivation and task performance" (Krebs et al., 2022; citations excised).

The present rubric structures the family evaluation process so as to (1) minimize bias and assure a full breadth of inquiry; (2) broaden clinicians' perspective and thereby minimize the silo-ing effects that can be associated with some child therapies (Garber, 2004); (3) optimize evaluators' likelihood of considering each of the numerous factors presently associated with PCCP, (4) provide work-product reviewers with a standardized format with which to assess the comprehensiveness of others' evaluations, (5) establishes a format useful for attorneys preparing for either direct- or cross-examination of evaluators, work product reviewers, and experts and (6) offers the court a means to better understand and weigh the probative value of arguments and opinions in PCCP matters.

The rubric breaks out the factors presently associated with PCCP into six domains of inquiry (Garber, 2019a). Each domain includes a number of specific questions, all of which must be considered. Evidence that any one question or domain may be relevant in a given case is not reason to interrupt the rubric. In total, all thirty-one questions posed should considered in the process of evaluating the unique recipe of interwoven variables relevant to any particular case.

Should some factors or specific questions be given greater weight or conceptual valence when evaluating a particular family system? Certainly, questions of safety must take priority. Discovery of threats to the physical or emotional safety of any participant in the system is good reason to carefully shape the remainder of the inquiry so as to assure the well-being of all. In some extreme instances, this may mean curtailing the process entirely. More commonly, the remaining factors will be explored cautiously in the knowledge that threats to safety (e.g., domestic violence, child abuse, neglect) are often embedded among other concomitant variables

that are together associated with PCCP and all of which must be addressed in the interest of healthy change.

It is important to clarify three final points: (1) This rubric must not be misconstrued as a test, inventory, assessment, or questionnaire (Garber et al., 2022a). It yields no answers, scores, or statistical analyses. It cannot determine in and of itself why a child is aligned with one parent and resists or refuses contact with the other. It can only help to structure the approach of those who are seeking such answers and generate hypotheses in need of further inquiry. (2) The sequence of domains and questions posed in the rubric is unimportant. The evaluator is left to engage in whatever process is deemed to best suit the circumstance and thereby to address the relevant variables in whatever sequence possible. The rubric serves only as a reminder to the professional to make every effort to examine the full breadth of variables identified. (3) Finally, this rubric must not be considered a final product. It is emergent and responsive to the evolving science. As such, the rubric will be modified as research, theory, and case law define those variables relevant to PCCP. In order to remain useful, the rubric must grow as the science grows.

The rubric.

Six domains of inquiry are identified below. These are (1) Incidental sensory, temporal, and proximal variables; (2) Child-specific variables; (3) Parent A-Child dyadic variables; (4) Parent B-Child dyadic variables; (5) Systemic variables; and (6) extra-systemic variables. Note that there is no discussion of variables specific to either parent. This is because there is no certain relationship between any characteristic of any parent and that adult's parenting ability or the quality of the relationship "fit" between that parent and his/her/their unique child. A best interests analysis calls for focus on the impact of these variables on the child.

Each domain is associated with specific questions and associated evaluative, therapeutic, and/or adjudicative considerations. Evaluation of PCCP requires that every question identified below be carefully considered.

In order to simplify description (1) PCCP is described as the child's alignment with Parent A and resistance or refusal to transition into and remain in the care of Parent B, (2) Parent A is referred to using female pronouns; (3) Parent B is referred to using male pronouns; and (4) The child is referred to using female pronouns. These conventions should not be mistaken as limiting the gender of any participant in this process or expressing prejudice of any kind.

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?	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
(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?[15]	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, 2019b)? 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?
(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?	

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.[16] 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

[15] "… 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).

[16] "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.

(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? 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? 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? 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.
(b) Does the child resist change, transition, and/or separation across contexts (i.e., not exclusively when transitioning between care environments)?	
(c) Is the child's resistance due to diagnosed/diagnosable social, emotional, behavioral, cognitive differences and/or physical disability?	
(d) Is the child's resistance due to a history of trauma not exclusively associated with either adult?	

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?[17]

[17] Both 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).

Questions	Relevant Considerations
(a) Is the child's resistance due to a relationship affinity appropriate to the child's experience, development, and culture?[18,19]	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"[22] 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.[20]
(e) **Enmeshment:** Are the interpersonal boundaries between Parent A and the child appropriate to the child's developmental capacities and the ambient culture?[23] 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?

[18] Friedlander 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."

[19] "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).

[20] "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)

[22] "[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

[23] "…. [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 and Walters 2010 p. 105.)

(f) Do Parent A and the child share extreme and delusional beliefs suggestive of *folie à deux* (Johnston and Sullivan, 2020)?	vi. Enmeshment can feel very rewarding to a child creating disincentive for change. vii. Folie à deux 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[21]).

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
(a) Did the child ever have a relationship of any sort with Parent B?	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. 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. iii. Cultural, language, dietary, and religious differences (among many such variables) can contribute to a child's discomfort, confusion,
(b) Does the child experience Parent B's behavior, language, habits, beliefs, or activities as foreign, unacceptable, or embarrassing?	
(c) **Estrangement:** Has the child directly experienced Parent B as insensitive, unresponsive, abusive, or neglectful toward her?[24]	
(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	

[21] "The mother harboured 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 harboured 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.

[24] Note 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.

exposure.g., domestic violence, intimate partner violence)? [25]	embarrassment, and resistance or rejection of Parent B.
(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?	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 and Johnston, 2001). 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 (Birnbaum and Alaggia, 2006; Saini et al., 2017)?

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

[25] "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 and Walters 2010 p. 106)

(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.	particularly those who are required to transition frequently between such homes reasonable resist transitions as too emotionally and cognitively stressful (i.e., "culture shock").
(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?	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.
(e) How does the child interpret Parent A's non-verbal (e.g., vocal tone, body language) reactions to Parent B?	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.
(f) Is the child escaping the adult conflict by arbitrarily picking sides?[26]	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.
(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.	vi. Assess parenting styles using Baumrind's typology (e.g., Baumrind, 1991; 2013): permissive, disengaged, authoritative, authoritarian. 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.

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?

[26] "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 and Walters, 2010, p. 101).

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
(a) Who among the child's full range of relationships is directly or indirectly influencing the child's emotions and behavior?	(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.
(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).	(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?
(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?	(iii) Does the child have any peer and/or media models of healthy relationships with both parents when apart?
(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?	
(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"?	

Discussion

This article presents a rubric intended to assure that professionals seeking to evaluate or adjudicate parent-child contact problems look beyond simple and appealing either/or considerations to more fully

understand and, on that basis to more effectively work in support of each child's right to enjoy a healthy relationship with both (all) caregivers.

The rubric tendered incorporates thirty-one specific questions organized into six generic, systemically-informed domains of inquiry and presented with numerous accompanying considerations. This presentation is intended to capture our present understanding of the many interwoven practical exigencies and relationship dynamics that are often observed when a child becomes strongly aligned with Parent A and resists or refuses contact with Parent B.

The choice to parse this presentation into these particular domains and to include these particular questions is a reflection both of this author's professional experience and understanding of the literature and to a lesser extent the state of the science. Certainly this rubric will grow over time as theory, research, and case law gradually discover how these and presumably other as-yet unidentified variables bear on PCCP. The rubric remains valuable in its present form, nonetheless, to the extent that it assists evaluators, peer reviewers, attorneys, and finders-of-fact to see beyond the simple and appealing but grossly distorted binary view that would have us believe that resist/refuse dynamics are solely and exclusively due to estrangement or alienation.

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