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Judgments regarding parental alienation when parental hostility or child sexual abuse is alleged

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ABSTRACT

Allegations of Parental Alienation (PA), the systematic disparaging of one parent by the other parent aimed at alienating their child's affections, as a basis for child custody decisions are highly controversial. Claims of parental hostility or allegations of child sexual abuse in custody cases may trigger concerns about PA. Family court professionals ($N = 280$) rated young children's accuracy of report (e.g., suggestibility, honesty) in general and also read three custody scenarios varying as to whether or not they included allegations of parental hostility or child sexual abuse, or no such allegations. For each scenario, the alleged alienating parent's gender was experimentally varied between subjects. Participants rated the likelihood that each case involved PA. For the scenario that included allegations of child sexual abuse, professionals who viewed young children as more inaccurate reporters or who read about the mother (rather than a father) as the alleged alienator were more likely to rate the scenario as involving PA. For the scenario that described parental hostility but no child sexual abuse allegations, professionals who were older or female were more likely to judge the scenario as involving parental alienation when a mother (rather than a father) was the alleged alienator, whereas there were no significant predictors of responses to the no-allegation scenarios. Findings are discussed in relation to the difficult task of evaluating custody cases for PA when parental hostility or child sexual abuse is alleged.

KEYWORDS

Parental alienation; child custody; children; sexual abuse; parental hostility

Professionals working in the child custody arena must grapple with the difficult issue of ensuring that children's voices are heard, while simultaneously recognizing that young children, under certain circumstances, can be inaccurate in their reports. Concerns regarding children's inaccuracy,

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including their suggestibility, are often central in contested custody cases when Parental Alienation (PA) is alleged. Although definitions of PA vary, for purposes of this study, PA refers to the systematic disparagement of one parent by the other with the intent to cause the child to feel unfriendly, hostile, or indifferent towards the other parent. These complex cases may require professionals to assess whether children have been falsely convinced of the negative nature of a parental figure. Concerns regarding children's report accuracy, including their suggestibility, are exacerbated in custody cases when allegations are made regarding parents' hostility or children's sexual victimization because, in many such cases, children's statements are the only direct eyewitness evidence in support of such accusations.

In contested child custody cases, there is considerable debate among family court professionals and academics about utilizing the concept of PA. Advocates of PA argue that it is useful for identifying why children in custody proceedings express hostility or fear toward one parent and not the other (Kelly & Johnston, 2005). Opponents argue against the concept's recognition in family court decisions, due in part to concerns regarding the lack of empirical support for PA (Bruch, 2001). In the face of this ongoing debate, some countries (e.g., Brazil) statutorily recognized PA as a factor in custody decisions, supporting it as a basis for changing custody to the nonalienating parent (e.g., Presidency of the Republic Civil House Law No. 12 318, 2010). Other jurisdictions, including many states in the U.S., have not formally recognized PA as a basis for custody decisions, although interparental hostility can be a factor in custody determinations (e.g., Child Welfare Information Gateway, 2016).

Professionals who evaluate families in custody disputes play an influential role in advising the family courts. The family court must ultimately make decisions as to PA and children's best interests. We sought to analyze factors that predict family court professionals' decisions in cases involving PA or child sexual abuse, specifically, whether the gender of the parent being accused of alienating the children from the other parent, and the family court professionals' gender or their views about the accuracy or inaccuracy of children's reports predict their PA judgments regarding hypothetical scenarios relevant to custody disputes that included allegations of parental hostility or child sexual abuse. In this paper, we review the history of PA and prior PA-relevant research. We then present a set of hypotheses and describe our study and its findings.

Transition from parental alienation syndrome (PAS) to parental alienation (PA)

In the 1980s, Richard Gardner first coined the term Parental Alienation Syndrome (PAS). Advocates then used Gardner's writings to argue that, in

some custody cases, *alienators* (e.g., mothers) would alienate children against the other parent (e.g., the father) often in an attempt to gain or solidify custody. Purported alienating tactics included false claims of child sexual abuse and highly leading suggestions attempting to coerce children to reject the other parent, sometimes described as “brainwashing” (Gardner, 1991). Some experts consider the act of alienating a child from a parent to be child abuse in and of itself (Kloth-Zanard, 2010). As Gardner initially asserted that women were particularly likely to falsely allege child abuse, he suggested that children be placed with their fathers when mothers claim abuse because children’s estrangement is often the result of the mothers’ attempt to gain custody (Gardner, 1992; Meier, 2009). Gardner (2002) later wrote that fathers and mothers (not just mothers) could be alienators.

Due to a lack of valid research supporting PAS and concerns about gender bias, advocates shifted away from PAS to PA (Kelly & Johnston, 2005; Lorandos, Bernet, & Sauber, 2013). Those professionals who rely on PA as a useful framework recognize that a variety of reasons can underlie a child’s refusal to spend time with a parent (e.g., abusive parenting, feelings of rejection, family violence, parental abandonment), and these professionals thus recommend individualized assessments (Johnston, 2005).

However, it can be argued that gender biases persist from Gardner’s original formulation (Bruch, 2001). A concern is that the initially articulated gender bias may continue to influence professionals’ decisions when the case facts do not clearly substantiate claims that one parent is attempting to create negativity in the child toward the other parent. Opponents also argue against utilizing PA as the basis of custody decisions on the grounds that it (like PAS) is not supported by empirical research (Bruch, 2001). Furthermore, some argue that the lack of a clear difference between PA and PAS leads PA advocates to borrow concepts from PAS (Meier, 2009). For these reasons, there are concerns that use of the term PA leads to the same or similar conclusions as when family court professionals’ evaluations relied on notions of PAS.

Parental hostility accusations and parent gender

Concerns about PA can be triggered in contested child custody cases when parents’ hostility toward each other appears to affect children’s attitudes toward one of the parents in negative ways. Empirical research indicates that interparental hostility, before, during and after separation, is harmful to children (Amato & Rezac, 1994; Fosco & Feinberg, 2015; Grych & Fincham, 1990; Rowen & Emery, 2014). This hostility is believed to occur more in divorced (vs. nondivorced) families, although at fairly low rates

(Rowen & Emery, 2014). When both divorced parents have more (compared to less) frequent access to their children, they communicate with each other more frequently, but also sometimes experience greater hostility and conflict in their relationship (Nelson, 1990). Hostility and conflict between divorced parents may lead, on the one hand, to greater acknowledgement of abusive behavior by the other parent and greater willingness to protest to protect children, or on the other hand, to hypersensitivity, misunderstandings, or exaggerations regarding the other parent's behavior that are communicated to children, in either case potentially leading (rightly or wrongly) to allegations of PA.

Because of the large number of divorces each year involving children, the frequent interparental hostility involved in custody cases, and the important role that mental health professionals play in providing child custody evaluations for the family court, how such professionals evaluate interparental hostility is a matter of concern. Specifically, concerns have been raised that custody decisions that ignore ongoing parental hostility are not gender neutral (Opie, 2005), and that child custody professionals' views about interparental hostility may affect their decisions. Saunders, Faller, and Tolman (2016) asked professionals whose work takes them into family courts, such as child custody evaluators, judges, and attorneys, to read vignettes about serious interparental hostility (i.e., domestic violence) in separating couples and to make judgments about appropriate child custody considerations. Of special relevance to the present study, custody evaluators, sometimes in alignment with judges and private attorneys, tended to view mothers as most likely to make false allegations and alienate the children, and fathers least likely to do so. A separate analysis of the judges and evaluators revealed that beliefs about (female) domestic violence victims—for example, that victims try to alienate the child and that victims make false domestic violence allegations—predicted the recommendation of sole or joint custody to the (male) perpetrator in the vignette (Saunders et al., 2012; Saunders, Tolman, & Faller, 2013). The vignettes did not, however, examine fathers as victims or potential alienators. It was thus of interest to examine, in regard to PA ratings by professionals involved in family court child custody cases, if similar patterns would emerge for less severe interparental hostility and for cases in which parent gender varied.

Child maltreatment allegations and parent gender

When allegations of child maltreatment are involved in contested custody cases and there is no physical evidence of child abuse or neglect, PA may emerge as a possible concern. Child protective services (CPS) workers, who regularly evaluate allegations of child maltreatment, indicate that few child abuse cases involve intentionally false allegations (although more so when

custody is at issue). Instead, within the context of parental separation, when allegations of child abuse are made by a parent, CPS workers specify that it is more frequently the noncustodial parent, often fathers, who raise the issue against the custodial parent (often the mother; Trocmé & Bala, 2005). However, these cases prove to be a challenge for professionals; CPS workers have a higher rate of classifying an allegation of child abuse as unfounded when there is (vs. when there is not) postseparation conflict (Fallon et al., 2015; Houston, Bala, & Saini, 2017).

Special concerns arise in contested custody cases that involve allegations of child sexual abuse (Corwin, Berliner, Goodman, Goodwin, & White, 1987; Kuehnle & Kirkpatrick, 2005; O'Donohue, Benuto, & Bennett, 2016; Schudson, 1992; Trocmé & Bala, 2005). One concern is that such cases often activate preconceived notions or bias about gender. Reasons for possible gender prejudice include the following: Although males (compared to females) are more often reported as perpetrators of sexual crimes against children, child sexual abuse cases are difficult to prove due to the frequent lack of physical evidence of a sexual nature (Conte & Vaughan-Eden, 2018; Finkelhor, 1984). Moreover, as young children typically disclose sexual abuse to their mothers (Berliner & Conte, 1995) and mothers are more likely than fathers to report child sexual abuse to authorities (Houston et al., 2017), there are concerns that these young children may be easily suggestible when questioned by mothers, who may misunderstand their children's communications and mistrust their former spouses, resulting in false allegations of abuse (Ceci & Bruck, 1993). Research has often uncovered heightened suggestibility particularly in young children (e.g., Goodman & Reed, 1986; but see Otgaar, Howe, Brackmann, & Van Helvoort, 2017). To the extent that family court professionals may be less likely to believe mothers and to view them as more alienating, as suggested by the professionals' responses to domestic violence vignettes as previously indicated (Saunders et al., 2015), their recommendations could be influenced as a result (Schafran, 1985). A parent's report of child sexual abuse can result in custody being taken away from that parent who is rightfully alleging child maltreatment, with custody given to the abusive parent (the perpetrator of child sexual abuse; Meier, 2009).

If family court professionals are more likely to find women (vs. men) to be the alienating parent, it may be because women spend more time with their children and this results in more opportunities for real or alleged alienation. Alternatively, gender stereotypes may work against mothers (Adams, 2006). For these reasons, family court professionals may be inclined to find PA where the mother, as opposed to the father, is alleged to be the alienating parent, when child sexual abuse is raised in the context of child custody disputes.

Conversely, family court professionals may be less inclined to believe a father's claim that the mother is alleging child sexual abuse to alienate the children against the father because men are traditionally viewed as the offenders of child sexual assault and as more aggressive and violent than women (O'Donohue, Cirlugea, Bennett, & Benuto, 2016; Smit, Antokolskaia, & Bijleved, 2015; Stathopoulos, 2013). These belief patterns (whether founded or not) could create prejudice against fathers and then potentially lead to custody changes that favor mothers. To our knowledge, however, no experimental study has empirically analyzed the relation amongst family court professionals' PA decisions and the gender of the alienating parent when child sexual abuse is alleged.

Professionals' beliefs about children's accuracy and professionals' gender

A factor that might significantly influence how family court professionals make decisions in PA cases is their belief regarding the accuracy or inaccuracy of children's reports, including for example, children's suggestibility and honesty. It is an empirical question as to whether such beliefs would predict professionals' PA ratings in cases involving allegations of interparental hostility, but there is scientific evidence to predict that such beliefs will affect evaluations of alleged child sexual abuse.

Adults who endorse children's proneness to fabricate allegations of sexual assault are less likely than others to believe child victims in mock child sexual abuse cases (Gabora, Spanos, & Joab, 1993). Although beliefs about children's inaccuracy are associated with decreased perceived credibility for child witnesses generally (Goodman, Golding, & Haith, 1984; Leippe & Romanczyk, 1987; Leippe, Brigham, Cousins, & Romanczyk, 1989), adults tend to view younger compared to older children as lacking in the sexual knowledge needed to contrive a false report. This belief can lead to higher ratings of young children's credibility in cases of sexual victimization (e.g., Bottoms & Goodman, 1994; Goodman et al., 1984). If, however, there is suspicion or evidence of highly leading questioning by a parent, as would often be feared in PA cases, compared to more neutral questioning and statements, then young children's (i.e., preschoolers') claims of child sexual abuse are less likely to be believed (Castelli, Goodman, & Ghetti, 2005).

Gender differences exist in attitudes toward child witnesses regarding allegations of child sexual abuse: Compared to men, women are more likely to think that children have reasonable witness abilities and consider children to be less suggestible about child sexual abuse (Bottoms & Goodman, 1994; Gabora et al., 1993; Kovera, Borgida, Gresham, Swim, & Gray, 1993). Relatedly, a robust finding in the literature on adults' decisions in child sexual abuse cases is that compared to men, women find the allegations

more credible and the person accused as more likely to be guilty (e.g., Bottoms & Goodman, 1994; Kovera, Levy, Borgida, & Penrod, 1994; McCauley & Parker, 2001; Quas, Bottoms, Haegerich, & Nysse-Carris, 2002; Redlich, Myers, Goodman, & Qin, 2002; for a comprehensive review, see Bottoms, Golding, Stevenson, Wiley, & Yozwiak, 2007). In mock trial studies, this trend emerges regardless of the gender of the defendant (Quas et al., 2002).

Overall, attitudes about the inaccuracy of children's reports might at least partly explain professionals' beliefs about the likelihood that PA is involved in a custody case especially when child sexual abuse is alleged. Moreover, there are gender differences in these attitudes, and these attitudes are linked to child sexual abuse case judgments. Therefore, we predicted that gender differences in attitudes toward the accuracy of children's reports would contribute to gender differences in judgments of the likelihood that PA was occurring in contested custody case scenarios that involved allegations of child sexual abuse.

Present study

This research addresses gaps in the scientific literature regarding whether the alienating parent's gender, the professional's gender, the professional's views of children's inaccuracy, and the type of allegation (including the presence of parental hostility claims, child sexual abuse allegations, or no such allegations) affect family court professionals' hypothetical PA decisions.

For the study, family court professionals in the US completed an online survey regarding their general prior experience with family court and their more specific experiences with PA. Because definitions of PA may vary, we attempted to ensure that the professionals utilized a similar working definition by defining "parental alienation" for the purposes of this study. Specifically, participants were told that they should define PA as the systematic disparagement (to speak damagingly of, criticize in a derogatory manner, treat or represent as lacking in value or importance) of one parent (the alienated) by the other parent (the alienator) with the intent to cause the child to feel unfriendly, hostile, or indifferent (alienate the child) towards the alienated parent.

The survey also included questions concerning beliefs about the inaccuracy of young children's reports (e.g., in child abuse cases, 3- to 5-year-olds have a tendency to tell lies; 3- to 5-year-olds are easily suggestible by their parents; in high-conflict custody cases, 3- to 5-year-olds are not easily brainwashed by their custodial parents against the noncustodial parents). Three hypothetical cases involving custody disputes were included. The three scenarios varied as to the presence or absence of hostility by one

Table 1. Participant demographic and professional experience information.

Variables	Mean/Percentage	<i>SD</i>
Age Group	5.15	0.85
Gender (proportion)	0.81	0.48
Race/Ethnicity (%)		
Caucasian/Non-Hispanic	79.64	
Hispanic/Latinx	17.14	
African American	1.43	
Asian	1.07	
Other	0.71	
Professions (%)		
Psychologist	24.88	
Other Mental Health	22.58	
Legal	17.28	
Mediator	25.11	
Professor/Researcher	4.60	
Other	5.52	
Professional experience		
Number of custody evaluations (%)		
0	13.60	
1–10	4.30	
11–50	16.80	
51–100	12.90	
>100	52.50	
Years of experience category	4.30	1.36

Age group: 1 = 18–25 years, 2 = 26–35 years, 3 = 36–45 years, 4 = 46–55 years, 5 = 56–65 years, and 6 = 66+ years). Gender: 1 = male, 2 = female. Approximate number of years of experience conducting or making custody evaluations, decisions, or recommendations professionally: 1 = none, 2 = less than 1 year, 3 = 1–5 years, 4 = 6–10 years, and 5 = more than 10 years. Percentages for professions add to more than 100% because some participants indicated multiple professions.

parent against the other and the presence or absence of child sexual abuse allegations: Hostility Scenario (parents allegedly engage in active disparagement of the other parent but there are no allegations of child sexual abuse), Child Sexual Abuse Scenario (the alienating parent accuses the other parent of sexually abusing their child but there are no other overt hostile actions by the parent), and No Hostility/No Child Sexual Abuse Scenario (a parent is accused of PA by the other parent but there are no overt allegations of hostility by that parent or allegations of child sexual abuse; instead the parent alleging alienation has rarely spent time with the children). Order of the scenario type varied within subjects, whereas parental gender of the alienating parent (male vs. female), as indicated at the end of the scenario, varied between-subjects. After reading each of the scenarios, presented online, participants made judgments about how likely it was that the case involved PA.

We advanced three main hypotheses. First, due to the possible influence on family court professionals' decisions of gender bias regarding the parent who is allegedly fomenting hostility (the parent accused at the end of the scenario of being an alienator, that is, accused of PA; Bradshaw & Hinds, 2005; Schafran, 1985), we predicted that participants would find PA more likely when reading about the mother, compared to the father, as the

alienator, as stated at the end of the scenario. Second, due to participant gender differences in ratings of child sexual abuse cases, we anticipated that males would be more likely than females to indicate possible PA for the Child Sexual Abuse Scenario but not for the Hostility or the No Hostility/No Child Sexual Abuse Scenarios. Finally, we expected that more negative views about children's accuracy of report would predict professionals' judgments of the likelihood of PA especially in the scenario that included allegations of child sexual abuse.

Method

Participants

A total of 280 family court professionals, that is, individuals who play a role in custody decisions (e.g., judges, attorneys, mediators, psychologists, social workers, and other clinicians) completed the survey (62.5% female, $n=175$). Demographic information is presented in [Table 1](#). The most frequent age groups were 56 to 66 years ($n=109$, 38.9%) and 66+ years ($n=113$, 40.4%). Most participants were quite experienced in terms of years within their professions, with a majority ($n=210$, 75.2%) having more than 10 years of experience. The majority were Caucasian (non-Hispanic), as is also true in the United States for legal, social work, and mental health professionals (APA, 2017; US Census Bureau, 2016).

Measures

Demographics and professional experience questionnaire

This measure gathers basic demographic information and information about participants' age, gender, profession, years of experience, and number of custody evaluations, decisions, or recommendations conducted throughout the respondent's career. Age is indicated by marking one of six age groups (1 = 18–25, 2 = 26–35, 3 = 36–45, 4 = 46–55, 5 = 56–65, and 6 = 66+). Questions also concern gender (1 = male, 2 = female) as well as occupation by marking a response from a list of potential categories (e.g., psychiatrist, attorney, judge, and researcher). The questionnaire also includes five categories to indicate the approximate number of years of conducting or making custody evaluations, decisions, or recommendations professionally (1 = none, 2 = less than 1 year, 3 = 1 to 5 years, 4 = 6 to 10 years, and 5 = more than 10 years). Included is also a question for respondents to provide an approximation of the number of custody evaluations, decisions, or recommendations conducted throughout their careers by selecting one of five categories ranging from “0” to “Over 100.”

Table 2. Children's Accuracy of Report (CIR) Scale items.

Order	Sentence
1	In child abuse cases, 3- to 5-year-olds have a tendency to tell lies.
2	Testimony from 3- to 5-year-old children is too emotionally laden.
3	Three to 5-year-old child witnesses who act highly confident during a trial are lying.
4	Children, 3- to 5-years-old, are <u>psychologically</u> incompetent to provide testimony in a trial.
5	I would be more likely to believe the testimony of an adult than the testimony of a 3- to 5-year-old child.
6	Three to 5-year-olds are easily suggestible by their parents.
7	In high-conflict custody cases, 3- to 5-year-olds are <u>not</u> easily brainwashed by their custodial parents against the noncustodial parents.
8	In high-conflict child custody proceedings, 3- to 5-year-olds will falsely report child sexual abuse to let them stay with one of the parents.

Response categories were: 0 evaluations, 1–10 evaluations, 11–50 evaluations, 51–100 evaluations, over 100 evaluations.

Familiarity with PA and PAS

One question asked about participants' familiarity with PA and PAS. Respondents indicate their familiarity by checking as many of the following options that applied to them: familiarity with "Parental Alienation Syndrome," familiarity with "Parental Alienation," "I am not familiar with either of these terms," and "Don't now."

Children Inaccuracy of Report (CIR) scale

The CIR items were written for the present study to evaluate views toward young children (preschoolers) in custody evaluations. The items are each followed by a 7-point Likert scale ranging from "strongly disagree" to "strongly agree." The items forming the CIR Scale are presented in [Table 2](#). For purpose of statistical analysis, items are reversed scored as appropriate. Cronbach's alpha was deemed acceptable at 0.66. Each participant's mean score was calculated, with higher scores reflecting ratings of young children as more inaccurate reporters.

Parental alienation scenarios

This measure, specifically designed for this study, described three hypothetical cases ([Appendix A](#)). Each hypothetical case concerns a divorced couple involved in a custody dispute. All couples consist of a male father and a female mother. For each scenario type (Hostility, Child Sexual Abuse, and No Hostility/No Child Sexual Abuse), gender of the alienating parent as stated at the end of the scenario is counterbalanced across participants (see below). Each scenario describes the allegations but the term "PA" is mentioned only in the last sentence of the scenario (e.g., Mom claims Parental

Alienation in this case). After reading each scenario, participants use a 4-point scale to indicate whether the scenario involved PA, with 1 = definitely not, 2 = probably not, 3 = probably yes, and 4 = definitely yes. We chose not to include a Hostility/Child Sexual Abuse scenario in order to differentiate reactions to hostility and child sexual abuse in relation to PA judgments and to avoid ceiling effects, as we were interested in responses to ambiguous cases. All scenarios were piloted with Psychology college students to ensure clarity and appropriateness of the instrument.

Procedure

The research was approved by the university's Institutional Review Board. Participants were invited from a list of emails gathered for prior research into US family court professionals' decisions (Saunders, Geffner, Bucky, Ribner, & Patino, 2015). All participants with still-valid email addresses were sent an email invitation to participate in the research. The email indicated that professionals could forward the invitation to other family court professionals. Thus, "snowball sampling" was utilized. None of the participants received financial compensation for their participation.

Consent to participate was obtained prior to the start of the survey. The survey was administered online, and participants had the option of completing the survey in one or multiple sessions.

Participants initially answered demographic questions and indicated their familiarity with PA and PAS. Then the following instruction was presented at the start/top of each question block: "The following statements concern your feelings about children and our legal system. While completing the survey, please consider the words "child" or "children" to indicate both boy(s) and girl(s). In responding to statements that contain the words "case" or "trial," consider these words to represent a *child abuse case in which an adult has been accused of abusing a child in some manner*. These statements indicate your opinion; there are no right or wrong answers."

The CIR Scale items were presented intermixed with similar items. Participants were then asked to evaluate three scenarios, which fell into the following categories (although not labeled as such): Hostility, Child Sexual Abuse, and No Hostility/No Child Sexual Abuse. Then, participants evaluated if the scenario was a case of PA using a 4-point Likert scale ranging from "definitely yes" to "definitely no." Half of the participants read a scenario where the mother was the alienator (mother as the alienator), and the other half read the exact same scenario except the father was the alienator (father as the alienator). The gender of the alienating parent in the third scenario was randomly determined but counterbalanced across participants. Each participant evaluated at least one case where the mother was the

Table 3. Means, standard deviations, and correlations for key demographic variables, Children Inaccuracy of Report (CIR) Scale scores, and scenarios evaluation regarding parental alienation.

Variables	<i>M</i>	<i>SD</i>	1	2	3	4	5	6
1. Age group	5.15	.85	—					
2. Participant gender	1.63	.49	-.25**	—				
3. CIR Scale score	4.34	.86	.02	-.13	—			
4. CSA scenario	2.36	.64	.11	-.06	.21**	—		
5. Hostility scenario	2.50	.67	.14*	.11	-.04	.20**	—	
6. No Hostility/No CSA scenario	2.01	.70	-.01	.02	.08	.12	.14*	—

Age group: 1 = 18-25 years, 2 = 26-35 years, 3 = 36-45 years, 4 = 46-55 years, 5 = 56-65 years, and 6 = 66+ years. Participant gender: 1 = males, 2 = females. CIR: Children's Accuracy of Report Scale; CSA: child sexual abuse.

* $p < .05$. ** $p < .01$.

alienator and one where the father was the alienator. Scenario order was randomly assigned. After reading each scenario, participants rated the likelihood that PA was involved in the case.

Results

We first present descriptive statistics concerning the participants' knowledge of PA and PAS concepts. Next, we report the correlations among key variables. Then three regressions are described, one for each type of scenario (Hostility Scenario, Child Sexual Abuse Scenario, and No Hostility/No Child Sexual Abuse Scenario).

Knowledge of and experiences with parental alienation

As a first step, we considered participants' familiarity with the concept of PA. Almost all participants stated that they were familiar with PA (277 of the participants [98.9%]). Only three participants indicated that they were *not* familiar with PA. Regarding PAS, 273 respondents said they were familiar with this term (97.5%). Participant age and years of experience were significantly correlated, although the magnitude of the correlation was low, $r = .14$, $p = .01$.

Correlational analyses

Means, standard deviations, and correlations for key variables are presented in Table 3. Females compared to males were older and, replicating prior findings, had lower scores on the CIR Scale. Participant age was positively correlated with the PA score on the Hostility scenario, indicating that older participants were more likely to believe that this was a PA case. For this reason, we included participants' age in each analysis reported in the following section. Finally, participants who thought that children are more

inaccurate indicated that the Child Sexual Abuse Scenario was more likely to involve PA.

Regression analyses

For each scenario, a series of regression models was tested. Participant age and participant gender were entered in the first model; alienator gender was then added in Model 2. The CIR Scale score was added in Model 3. The following two-way interactions were added in Model 4: Participant Gender X Alienator Gender, Participant Gender X CIR Scale score, and Alienator Gender X CIR Scale score. The final model included the three-way interaction term: Participant Gender X Alienator Gender X CIR Scale score. All significant effects are reported. Because we did not hypothesize participant age effects, interactions involving that variable were not included. Variance Inflation Factor (VIF), calculated to evaluate possible multicollinearity within the regressions, fell within an acceptable range of ± 2.00 .

Hostility scenario

The first analyses considered participants' ratings for the scenario where the case involved one parent alleging hostility by the other, but there were no allegations of child abuse. For the Hostility Scenario, participant age and participant gender (1 = male; female = 2) resulted in a significant model, $F(2, 229) = 4.97, p = .008$, as did the addition of alienator gender in the second model, $F(3, 228) = 4.97, p = .002$ ($n = 184$). As participant age increased, so did the likelihood of judging the scenario as involving PA, $b = .14, SE = .05, \beta = .18, t(1) = 2.70, p = .007$. Compared to male professionals, female professionals were more likely to judge the scenario as involving PA, $b = .22, SE = .09, \beta = .16, t(1) = 2.31, p = .022$. Moreover, those who read about the mother (rather than the father) as the alienator were more likely to judge the scenario as involving PA, $b = .19, SE = .09, \beta = .14, t(1) = 2.19, p = .03$. The CIR Scale score was not a significant unique predictor in the third model. The other models, with the interaction terms, were significant, but there were no other significant unique predictors.

Child sexual abuse scenario

The next set of analyses considered the scenario in which no parental hostility was mentioned but child sexual abuse was alleged; specifically, a parent alleged that the other parent sexually abused their child and the accused parent claimed the maltreatment allegations were acts of PA. It was hypothesized that participant gender, alienator gender, and the CIR

Scale score would predict ratings of PA for this scenario ($n = 226$). In contrast with our hypothesis regarding participant gender, the first model was not significant, $F(2, 230) = 1.52$, ns , but in agreement with our hypotheses about alienator gender and views about children's inaccuracy, the second and third models reached significance, $F(3, 229) = 3.13$, $p = .03$, and $F(4, 228) = 4.66$, $p < .001$, respectively. Professionals who read about the mother (rather than the father) as the alienator agreed more that the case involved PA, $b = .21$, $SE = .08$, $\beta = .16$, $t(1) = 2.51$, $p = .013$. Higher ratings on the CIR Scale score significantly predicted the PA rating for this scenario as well, $b = .15$, $SE = .05$, $\beta = .19$, $t(1) = 2.99$, $p = .003$. There were no other significant models.

No hostility/no child sexual abuse scenario

In the No Hostility/No Child Sexual Abuse scenario, one parent has primary custody and the other parent rarely spends any time with the children. Thus, although the parent who rarely visits the children claims PA, there are no allegations of overt hostility by either parent and no allegations of child sexual abuse. For the scenario with no alleged parental hostility or child sexual abuse, there were no significant regression models, $F_s(2-8, 223-229) \leq 1.19$, $ps \geq 0.31$.

Discussion

Family court professionals must navigate difficult child custody cases to reach decisions that are in the best interests of the children. The challenge of making these decisions is exacerbated when cases involve allegations of hostility or child sexual abuse and the accused parent claims PA. Critics of the concept of PA have been particularly apprehensive given that gender stereotypes and beliefs about children's inaccuracy (e.g., suggestibility) may underlie its construction. When there is a lack of physical evidence, biases and preconceived notions are particularly likely to predict adults' decisions in legal cases (e.g., Visher, 1987), and a lack of physical evidence is typical in some PA cases (e.g., those involving allegations of child sexual abuse). In these cases, the children's memory reports as recounted by the parents, if not by the children themselves, are often the main evidence underlying the accusations. As a result, family court professionals frequently face a difficult task in their decisions about parental custody when PA is alleged. Indeed, practitioners on both sides of the PA aisle have noted how difficult it is to evaluate cases involving PA claims; this seems especially true when the cases also involve child sexual abuse allegations (e.g., Baker, Gottlieb, & Verrocchio, 2016; Bow, Quinnell, Zaroff, & Assemany, 2002; Corwin et al., 1987).

This study attempts to tease apart potential factors that influence decisions involving PA. Specifically, we investigated participant gender and gender of the alienating parent across the three types of custody cases (Hostility, Child Sexual Abuse, and No Hostility/No Child Sexual Abuse). Family court professionals' ratings of the likelihood of PA were affected by the gender of the alienator, gender of the professional, and beliefs about children's inaccuracy of report in relation to the type of scenario presented.

Parental gender and parental alienation ratings

Our first hypothesis was that participants would find PA more likely when reading about the mother (compared to the father) as the stated alienator. The hypothesis was confirmed for the Hostility Scenario and the Child Sexual Abuse Scenario. In contrast, gender of the parent was not a significant unique predictor for the No Hostility/No Child Sexual Abuse Scenario.

Thus, the results of this study provide evidence for the presence of preconceived notions or biases about gender for some types of family court cases when PA is a concern. When women allegedly engaged in "typical," albeit fairly benign, forms of PA (as seen in the Hostility Scenario), they were rated as more alienating than when men allegedly performed the exact same actions. It is possible that this bias derives from Gardner's original formulation of PAS and his claim that women exaggerate claims of child abuse to gain custody of their children. Moreover, this partiality for claims made by fathers contradicts previous research suggesting a bias against males (Kelly & Johnson, 2008; O'Donohue et al., 2016; Smit et al., 2015; Stathopoulos, 2013) as it suggests that family court professionals in the U.S. are more likely to believe claims made by the father (who argues that the mother is an alienator) than claims made by the mother (who argues that the father is an alienator).

These findings are surprising given that there were no factual differences between the mother and father scenarios. Virtually the only way in which the case facts diverged was the placement of the word "mom" or "dad" (and the corresponding gendered pronouns) within the hypothetical scenarios. This finding, however, is consistent with the literature documenting a potential gender bias against women in family court (Saunders, Faller, & Tolman, 2012). Unlike Saunders and colleagues (2012), however, we did not measure participants' views of biased or gendered belief and, as such, the underlying mechanism remains unclear (e.g., do these differences result from perceptions about the base rates of certain forms of PA by males or females).

That said, we found no evidence of differences in PA ratings in relation to alienator gender for the No Hostility/No Child Sexual Abuse Scenario, which hints that the uncovered differences may be unique to those cases involving allegations of hostility or child sexual abuse. The invocation of the term “Parental Alienation,” which appeared at the end of each scenario, was not enough for differential gender perceptions to emerge. Instead, when women were described as behaving in a manner identical to that of men, but there were allegations consistent with interparental hostility or child sexual abuse, women were perceived as more alienating than men. However, women were not perceived as more alienating than men when there was no evidence or allegation of hostility or child sexual abuse.

The present findings should be interpreted with caution. The scenarios were limited in the facts that were presented about each of the cases to ensure that busy professionals (who generously gave of their time while also serving the family court community) had time to complete three scenarios in addition to the other questions. For example, although our hostility scenario included a number of facts regarding one parent making negative allegations about the other, and purported resulting changes in behavior by the children, it did not have the complexity and, perhaps, the extreme behavior observed in many PA cases. Given that extreme or heightened interparental hostility is assuredly bad for children and could have created ceiling effects in PA ratings (Fosco & Feinberg, 2015; Grych & Fincham, 1990; Rowen & Emery, 2014), we sought to avoid using scenarios in which we would expect all professionals to be concerned about the children’s living environment. Instead, we created more subtle scenarios that we would expect professionals to grapple with on a regular basis.

Perhaps for this reason, even though professionals’ ratings differed depending on the gender of the parent (despite all other case facts being virtually identical), participants’ overall mean ratings were on the low side of the likelihood of the PA scale and the unstandardized regression coefficients revealed only small-scale changes between the male and female scenarios. Consequently, there is reason to believe that, although there are statistically significant differences between ratings of PA depending on the alienating parent’s gender, the custody evaluators’ recommendations may not have differed. However, these small incremental differences in how facts are interpreted may have a cumulative effect over the course of a case. Several studies have documented a gender bias against women within family courts that ultimately lead courts to favor allegations made by males, thereby resulting in decisions favorable to fathers (Bradshaw & Hinds, 2005; Saunders et al., 2012; Schafran, 1985; see also Arizona Coalition Against Domestic Violence, 2003). Because facts in a custody case are often ambiguous and thus subject to interpretation, with a potential lens of

prejudice against mothers' claims of alienation or abuse, professionals may advise the courts in a way that favors fathers' positions. To the extent that this pattern occurs, it may ultimately produce a family court that often endorses case outcomes in favor of males, potentially even when allegations of child sexual abuse are accurate.

Participant gender and parental alienation ratings

Our second hypothesis was that males would be more likely than females to indicate possible PA for the Child Sexual Abuse Scenario but not for the other two scenarios, as the latter two did not involve child sexual abuse allegations. This hypothesis was based on highly consistent patterns from previous research of a gender difference in reactions to child sexual abuse cases, including for ratings of defendant guilt, child victim accuracy, and definitions of what constitutes child sexual abuse (Bottoms et al., 2007; Widom & Morris, 1997). Surprisingly, this pattern for participant gender, however, failed to emerge in the present study. Instead a participant gender difference emerged for the Hostility Scenario.

It is of interest that participant gender differences in our sample of family court professionals failed to emerge when child sexual abuse was alleged. Although it is difficult to interpret a lack of significant difference, the pervasiveness of past findings of such gender differences in college student and layperson samples regarding child sexual abuse cases (Bottoms et al., 2007) leads to several possible explanations for the absence of a significant professional gender difference for the professionals, such as: 1) Female and male professionals who are involved in family court custody cases have similar views, based on their experiences, training, initial inclinations, and/or the explicit or implicit social pressures upon them in their work; 2) Female (compared to male) family court professionals may be more attuned to or biased about parental hostility issues, but not more attuned to or biased in regard to child sexual abuse allegations, perhaps due to the widely held view that false reports of child sexual abuse are higher in custody disputes than in other contexts (Benedek & Schetky, 1985; Trocmé & Bala, 2005).

In fact, for the scenario with parental hostility but no child sexual abuse allegations, females indicated possible PA more than did males. Hostility is often considered a part of divorce conflicts generally (Fidler, Bala, & Saini, 2012), but the gender difference in PA ratings by the professionals was dependent on scenario type, with the parental hostility case that did not involve child sexual abuse allegations having a higher rating of possible PA by female than male professionals. This result was surprising but may indicate that when child sexual abuse is not alleged, female family court

professionals in the U.S. are more biased about or attuned to PA as a possibility than are male family court professionals, especially when hostility is explicitly emphasized, as it was in the Hostility Scenario. Further research is needed to determine if the gender difference that we found is replicable and, if so, what factors explain it.

Children's inaccuracy of report

Our third hypothesis was that higher scores on the CIR Scale would predict professionals' judgments of the likelihood of PA especially in the scenario that included allegations of child sexual abuse. This hypothesis was confirmed specifically for the Child Sexual Abuse Scenario, with higher CIR Scale scores (indicating that the participant believed children are less accurate reporters) predicting higher ratings that the case involved PA. This finding did not hold for the scenarios in which child sexual abuse was not part of PA allegations.

This study, therefore, highlights the unique role that individuals' views about child inaccuracy (e.g., suggestibility) may play in custody cases involving allegations of child sexual abuse. Indeed, considerable research on family courts has centered on child sexual abuse cases (Johnston, 2005). Although multiple variables might affect the outcomes of such cases, the present data indicate that professionals' views of how accurate children are in their reports are associated with how they evaluate cases involving child sexual abuse allegations.

Previous research on professionals' attitudes about the accuracy or inaccuracy of children's reports reveals diverse views among professionals depending on such factors as their professional roles, their gender, and their own past histories (e.g., Bala et al., 2005; Conte, Sorenson, Fogarty, & Rosa, 1991; Goodman, Batterman-Faunce, Schaaf, & Kenney, 2002; Melinder, Goodman, Eilertsen, & Magnussen, 2004). Our findings add new evidence for the idea that attitudes toward children's inaccuracy predict ratings of the likelihood of PA in contested custody cases involving allegations of child sexual abuse. These results imply that in family court, how professionals regard the accuracy of children's reports may influence their evaluations of PA cases, affecting how much they scrutinize the motivations of the party claiming child sexual abuse and how the children were questioned.

Participant age

We did not hypothesize that participant age would be associated with PA ratings, but age was a significant unique predictor for the Hostility Scenario. It is possible that cohort effects help to explain how certain types

of contested custody cases are evaluated. Older compared to younger professionals, due to their training, maturity, or experience, might be more attuned to the possibility of PA when interpersonal hostility could interfere with parenting.

Limitations and future directions

Although the present study provides valuable new insights, several limitations of the research should be kept in mind, particularly in interpreting our results in light of prior empirical findings. First, we did not include a scenario involving both parental hostility and child sexual abuse allegations. Future research should examine family court professionals' ratings of such cases. Second, each scenario utilized opposite-sex couples and binary gender definitions. We used this framework because it mirrors some of the issues and concerns regarding gender-perceptions or bias raised in the existing relevant literature. Future research, however, should broaden these definitions; understanding the rich and varied relationships that support and care for children is necessary in this line of study. Third, our use of snowball sampling may have introduced bias into our findings. Fourth, additional questions relevant to the basis of the family court professionals' judgments (e.g., their own marital status, whether they have children) could have been included. Future research should include questions of this nature. Fifth, all of our scenarios and our measurement of suggestibility focused on preschoolers, given past findings of increased suggestibility in this age range. It is unclear whether our results would extrapolate to custody decisions involving older children. Finally, the professionals in our study made their evaluations in response to short written scenarios rather than actual custody cases. Their judgments might be influenced and better predicted by more dynamic factors when they interface with parents and children who are parties in real-life custody cases wherein interparental hostility and/or child sexual abuse is alleged.

Conclusion

Although past research has highlighted children's allegations in the criminal courts, allegations involving children also arise in family courts when child custody is contested. Understanding factors that affect family court professionals' evaluations in child custody cases is important for achieving a scientific and legal basis for judgments regarding the best interests of children. Because many thousands of children are involved in contested custody cases each year in the U.S. alone, and family courts often count on custody evaluators for advice, understanding perceptions or biases that can

affect contested custody case decisions is crucial for children's best interest determinations.

We analyzed a set of possible predictors of family court professionals' views concerning scenarios involving alleged PA. When the scenario involved hostility between parents, older professionals and female professionals were more likely than others to view the case as involving PA, and professionals also rated PA as more likely when a father claimed PA by the mother. In the Child Sexual Abuse Scenario, mothers were also more likely than fathers to be viewed as alienators. Moreover, when child sexual abuse was alleged, stronger beliefs that young children are inaccurate reporters of their experiences predicted professionals' rating of child sexual abuse cases as more likely to involve PA. A similar result was not found for scenarios in which child sexual abuse was not alleged. Thus, our findings highlight the possibility that gender biases and preconceived beliefs about children might affect critical legal determinations such as those concerning the best interests of the child.

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Appendix: Scenarios

Hostility scenario: Father is accused of being the alienator

Elizabeth (Mom) and Daniel (Dad) are the parents of two children, John, age 5, and Katie, age 3. A year ago, the trial court awarded physical custody of the children to Dad, with joint legal custody and visitation rights to Mom. A year later, Mom filed an order to show cause seeking to modify custody and visitation on the ground that the children had stated a “strong preference that they reside with their mother at least 50% of the time.” Dad opposes the change in custody and visitation on the ground that there had been no significant change of circumstance and says that Mom is just trying to alienate their children from him. Mom claims that Dad does not provide the children with enough structure in the home and that he does not enforce rules. She claims that the children told her that they are allowed to play in the yard unsupervised. Mom also discovered that Dad had received a letter from the school stating their oldest child was having issues in school. The school principal told Mom that Dad had asked the school not to provide Mom with information regarding the oldest child. Mom declared it had been “extremely difficult to co-parent” with Dad, who refused to discuss any concerns she had about the children and made unilateral decisions regarding their school and outside activities. Mom began taking their son to school pursuant to Dad’s request and also tried to monitor the children’s school attendance and progress more closely, but just weeks later, Dad left a message on Mom’s answering machine stating she could no longer pick up John or help him with school because he was “sick of seeing Mom’s face.” Dad argues that “many of Mom’s allegations are unsubstantiated accusations from years ago” and that some are “either blatantly untrue or are mere innuendo.” He stated he was “very involved in the children’s education” and had made efforts to ensure their “attendance, punctuality and homework.” Dad is concerned that after extended visits with their mother the children were “extremely hostile” toward him and that John displayed “anger towards men in general.” He said that Mom bad-mouthed him in front of the children and that she is actually the one

letting the children break rules. For instance, their son allegedly was allowed on multiple occasions to stay up watching TV and eating candy all night and then, because he was so tired, skipped activities (including remedial tutoring) with Mom's permission while in Mom's care. Dad denied making it difficult for Mom to co-parent and claimed that rather, he had "attempted to work with her on their parenting responsibilities." Mom claims Parental Alienation in this case.

Hostility scenario: Mother is accused of being the alienator

Elizabeth (Mom) and Daniel (Dad) are the parents of two children, John, age 5, and Katie, age 3. A year ago, the trial court awarded physical custody of the children to Mom, with joint legal custody and visitation rights to Dad. A year later, Dad filed an order to show cause seeking to modify custody and visitation on the ground that the children had stated a "strong preference that they reside with their father at least 50% of the time." Mom opposes the change in custody and visitation on the ground that there had been no significant change of circumstance and says that Dad is just trying to alienate their children from her. Dad claims that Mom does not provide the children with enough structure in the home and that she does not enforce rules. He claims that the children told him that they are allowed to play in the yard unsupervised. Dad also discovered that Mom had received a letter from the school stating their oldest child was having issues in school. The school principal told Dad that Mom had asked the school not to provide Dad with information regarding the oldest child. Dad declared it had been "extremely difficult to co-parent" with Mom, who refused to discuss any concerns he had about the children and made unilateral decisions regarding their school and outside activities. Dad began taking their son to school pursuant to Mom's request and also tried to monitor the children's school attendance and progress more closely, but just weeks later, Mom left a message on Dad's answering machine stating he could no longer pick up John or help him with school because she was "sick of seeing Dad's face." Mom argues that "many of Dad's allegations are unsubstantiated accusations from years ago" and that some are "either blatantly untrue or are mere innuendo." She stated she was "very involved in the children's education" and had made efforts to ensure their "attendance, punctuality and homework." Mom is concerned that after extended visits with their father the children were "extremely hostile" toward her and that John displayed "anger towards women in general." She said that Dad badmouthed her in front of the children and that he is actually the one letting the children break rules. For instance, their son allegedly was allowed on multiple occasions to stay up watching TV and eating candy all night and then, because he was so tired, skipped activities (including remedial tutoring) with Dad's permission while in Dad's care. Mom denied making it difficult for Dad to co-parent and claimed that rather, she had "attempted to work with him on their parenting responsibilities." Dad claims Parental Alienation in this case.

Child sexual abuse scenario: Mother is accused of being the alienator

Michael (Dad) and Julia (Mom) are the parents of Sophia, age 3, and are in the process of divorcing. They have separated and are living apart. Sophia splits her time between Mom's house and Dad's house. After about 6 months of this arrangement, Sophia started having nightmares and did not want to spend the night at Dad's house. Mom reports that, after a recent weekend with Dad, Sophia complained of vaginal pain saying, "It hurts down there." Upon giving Sophia a bath, Mom noticed Sophia had a rash around her vaginal area. Mom asked Sophia if anything had happened "down there." Sophia did not answer but instead

started to masturbate. Mom then asked, “Did anyone hurt you down there?” Again, Sophia would not answer. Mom further reports that when she asked “Did you get hurt down there at Dad’s house?”, Sophia nods her head “Yes.” When Mom asked, “Was it Dad or his new girlfriend?” Sophia said “It happened at Dad’s and his new girlfriend’s house.” Mom stopped questioning Sophia at that point, feeling quite upset. Mom then called Child Protective Services. At the forensic interview at a Child Forensic Interview Center, Sophia denied that anyone touched her in a bad way and was unresponsive to most of the questions. The medical examination was inconclusive, with no confirmation of penetration. Mom was told by the police not to talk to Sophia about inappropriate touching, but to contact the police again if Sophia spontaneously disclosed more information. Dad claimed that Mom was angry and intentionally engaging in alienating behavior because she wants sole custody of Sophia and because Dad had a new girlfriend. Mom has complained to Dad that she does not like Sophia being around his new girlfriend and said that she thinks Dad should not be dating already. Dad adamantly denies he or anyone at his house abused Sophia or ever touched her, other than when changing her diapers when she was younger or helping her in the bathroom. He believes that Mom is just overreacting to ambiguous behavior and normal rashes that children sometimes develop. Dad also says that Mom is implanting a false memory of abuse in Sophia due to leading questioning. Dad also noted that Mom has reinforced the false memory by continuing to question Sophia over the weeks in violation of the police officer’s instruction not to question Sophia, showing Mom’s disregard for proper procedure. According to Mom, two weekends later, when Sophia returned from her visit with her Dad and his new girlfriend, Sophia seemed sullen and upset. She was rocking and wet her pants, and again had nightmares. Mom asked if any of the bad stuff happened again. Sophia said that they touched her again but Dad said he would punish her if she told. Mom started to refuse to let Sophia go to her Dad’s house and petitioned the court for sole custody, claiming that Sophia was sexually abused at Dad’s house and that Dad threatened Sophia. Dad claims Parental Alienation in this case.

Child sexual abuse scenario: Father is accused of being the alienator

Michael (Dad) and Julia (Mom) are the parents of Sophia, age 3, and are in the process of divorcing. They have separated and are living apart. Sophia splits her time between Mom’s house and Dad’s house. After about 6 months of this arrangement, Sophia started having nightmares and did not want to spend the night at mom’s house. Dad reports that, after a recent weekend with Mom, Sophia complained of vaginal pain saying, “It hurts down there.” Upon giving Sophia a bath, Dad noticed Sophia had a rash around her vaginal area. Dad asked Sophia if anything had happened “down there.” Sophia did not answer but instead started to masturbate. Dad then asked, “Did anyone hurt you down there?” Again, Sophia would not answer. Dad further reports that when he asked “Did you get hurt down there at Mom’s house?”, Sophia nods her head “Yes.” When Dad asked, “Was it Mom or her new boyfriend?” Sophia said “It happened at Mom’s and her new boyfriend’s house.” Dad stopped questioning Sophia at that point, feeling quite upset. Dad then called Child Protective Services. At the forensic interview at a Child Forensic Interview Center, Sophia denied that anyone touched her in a bad way and was unresponsive to most of the questions. The medical examination was inconclusive, with no confirmation of penetration. Dad was told by the police not to talk to Sophia about inappropriate touching, but to contact the police again if Sophia spontaneously disclosed more information. Mom claimed that Dad was angry and intentionally engaging in alienating behavior because he wants sole custody of Sophia and because Mom had a new boyfriend. Dad has complained to Mom that he does not like Sophia being around

her new boyfriend and said that he thinks Mom should not be dating already. Mom adamantly denies she or anyone at her house abused Sophia or ever touched her, other than when changing her diapers when she was younger or helping her in the bathroom. She believes that Dad is just overreacting to ambiguous behavior and normal rashes that children sometimes develop. Mom also says that Dad is implanting a false memory of abuse in Sophia due to leading questioning. Mom also noted that Dad has reinforced the false memory by continuing to question Sophia over the weeks in violation of the police officer's instruction not to question Sophia, showing Dad's disregard for proper procedure. According to Dad, two weekends later, when Sophia returned from her visit with her Mom and her new boyfriend, Sophia seemed sullen and upset. She was rocking and wet her pants, and again had nightmares. Dad asked if any of the bad stuff happened again. Sophia said that they touched her again but Mom said she would punish her if she told. Dad started to refuse to let Sophia go to her Mom's house and petitioned the court for sole custody, claiming that Sophia was sexually abused at Mom's house and that Mom threatened Sophia. Mom claims Parental Alienation in this case.

No hostility/no child sexual abuse: Mother is accused of being the alienator

William (Dad) and Laura (Mom) divorced almost three years ago. Mom has primary custody of their three children, ages 3, 4, and 5, and Dad has visitation rights on the weekend and holidays. Although Dad regularly calls the children, sends them birthday cards and gifts, and sends them messages, Dad has rarely seen the children for the past two years. Dad has not previously filed a petition to enforce his visitation or previously raised the issue with the Court. Dad claims that his failure in visitation is due to the fact that Mom has interfered for several years. Dad claims that Mom discourages the children from seeing him and does little to build a relationship between him and the children. He has filed a petition seeking to enforce his visitation rights and modify his child support obligations. The 4- and 5-year-olds both testified that Mom encouraged them to talk to their Dad and acknowledge special occasions, but the children expressed that they often did not want to speak to their father. Although all three children are old enough to speak on the phone (albeit briefly), they refuse to talk with Dad when he calls. The children said that they would rather not visit their Dad as they do not want to miss out on playing with their friends or their other activities. Mom says that she told the children to talk with Dad and that she contacted him to have a visit when she was near his home. But she mainly left it up to Dad to contact them to arrange visitation. Dad claims Parental Alienation in this case.

No hostility/no child sexual abuse: Father is accused of being the alienator

William (Dad) and Laura (Mom) divorced almost three years ago. Dad has primary custody of their three children, ages 3, 4, and 5, and Mom has visitation rights on the weekend and holidays. Although Mom regularly calls the children, sends them birthday cards and gifts, and sends them messages, Mom has rarely seen the children for the past two years. Mom has not previously filed a petition to enforce her visitation or previously raised the issue with the Court. Mom claims that her failure in visitation is due to the fact that Dad has interfered for several years. Mom claims that Dad discourages the children from seeing her and does little to build a relationship between her and the children. She has filed a petition seeking to enforce her visitation rights and modify her child support obligations. The 4- and 5-year-olds both testified that Dad encouraged them to talk to their Mom and acknowledge special occasions, but the children expressed that they often did not want to

speak to their mother. Although all three children are old enough to speak on the phone (albeit briefly), they refuse to talk with Mom when he calls. The children said that they would rather not visit their Mom as they do not want to miss out on playing with their friends or their other activities. Dad says that he told the children to talk with Mom and that he contacted her to have a visit when he was near his home. But he mainly left it up to Mom to contact them to arrange visitation. Mom claims Parental Alienation in this case.