

# Parental Alienation International

Advancing worldwide understanding in the field of parental alienation

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## Reunification Therapy for Parental Alienation: When it Works and When it Doesn't

Shawn A. Wygant, MA

REUNIFICATION THERAPY is the most commonly used intervention by family courts in cases of parental alienation (PA).<sup>1</sup> But is it the right tool for the job? A search on Westlaw using the terms “reunification therapy” and “parental alienation” yielded 147 cases. Analysis of these cases suggests that when there is clear evidence that the alienating parent continues to interfere with the child’s relationship with the targeted parent, reunification therapy routinely fails because the child continues to be exposed to the alienating parent’s ongoing negative influence.

### *In re Taylor*

The earliest reunification therapy PA case was reported in 2004<sup>2</sup> and involved an alienated female child refusing to visit her father after the California trial court had awarded the mother sole physical custody and allowed her to move to Virginia. The court ordered reunification therapy but the child did not participate and her therapist opined that the child “was not interested in meeting with Father” and “would be harmed” if forced to visit him. Darnall discussed this problem in his 2011 article: “Reunification therapy remains a difficult task because the alienating parent and child usually have little or no desire to participate in the therapy, and may try to sabotage any gains...”<sup>3</sup> He further opined that this type of therapy is “less effective with the severely alienated child and the obsessed parent.” Under Darnall’s conceptualization of reunification therapy the focus should be on the parents, not the child. He argued that when a child is ordered into reunification therapy or even individual therapy in the context of a custody dispute where parental alienation is occurring, “the child becomes the identified patient, suggesting that the problems between the parents are his or her fault” and “equally devastating to the child is the implication that they are responsible for repairing the damage between the parents.”<sup>4</sup> This is why Darnall said that the child “should never be the primary focus of reunification therapy” and “the parents ... should be ordered to participate ...”<sup>5</sup>

### *Sposato v. Sposato*

Darnall’s approach differs significantly from how the courts commonly order reunification therapy in PA cases by excluding the alienating parent and focusing on the child. For example, in the 2025 Pennsylvania case of *Sposato v. Sposato*,<sup>6</sup> the court found that the mother had engaged in severe parental alienation which caused serious psychological harm to the children and their relationship with their father. Reunification therapy between the children and the father was attempted but was unsuccessful because any progress made was immediately undone by the mother and the children would return from each session more hostile toward the father. The court was ultimately successful in reversing the alienation by ordering temporary custody with the father and having the children participate in the Turning Points program for severely alienated children.

<sup>1</sup> See Darnall, D. (2011). The psychosocial treatment of parental alienation. *Child and Adolescent Psychiatric Clinics*, 20(3), 479-494.

<sup>2</sup> *In re Taylor S.*, No. B177379, 2004 WL 2569489 (Cal. Ct. App. Nov. 12, 2004)

<sup>3</sup> Darnall, 2011, p. 483.

<sup>4</sup> *Id.* at 484.

<sup>5</sup> *Id.*

### ***Toomey v. Toomey***

Another example of how reunification therapy routinely fails, when the focus is on the child's relationship with the targeted parent while the child lives primarily with the alienating parent, is *Toomey v. Toomey* (2012).<sup>7</sup> The court found that the mother and maternal grandmother had engaged in parental alienation toward the parties minor male child resulting in ongoing harm to his relationship with his father. Reunification therapy was implemented but failed. The court identified the mother's interference, the maternal family system, and the child's encourage resistance by the mother as the source of the failure. The mother substantially interfered with the father's visitation and the child's therapy, the maternal relatives actively reinforced the breakdown of the targeted parent-child relationship, and the child was encouraged by the mother to decide whether contact occurred with his father. The only remedy that was successful in stopping the alienation was the court's no-contact order between the mother and the child and temporary custody with the father. This was another example of a court concluding that ordinary contact arrangements had failed because parental alienation continued to occur in the alienating parent's home.

### ***Woodward v. Woodward***

In *Woodward v. Woodward* (2023),<sup>8</sup> the Tennessee Court of Appeals reviewed an interlocutory appeal arising from a highly contentious divorce involving allegations of parental alienation and disputes over therapeutic interventions. The litigation centered on escalating conflict between the parents and the deterioration of the children's relationship with their mother. A custody evaluator concluded that the father's conduct had contributed to a severe alignment of the children against the mother and recommended a structured reunification intervention. The evaluator, Dr. Spirko, concluded that the father was engaging in alienating conduct that was damaging the children's relationship with the mother. Specifically, she determined that the father was: "...engaging in parental alienation tactics that have caused the parties' minor children to be aligned with Mr. Woodward and against Ms. Woodward." Dr. Spirko further reported that the children were displaying highly concerning behavioral patterns toward their mother that reflected the impact of this dynamic. The evaluator noted that the children were: "showing significantly concerning behaviors of aggression and coercive control toward their mother characteristic of proxy abuse."

Based on these findings, Dr. Spirko recommended a comprehensive intervention designed to address both the children's alignment with the father and the deterioration of their relationship with the mother. Her recommendations included a temporary separation from the father and therapeutic intervention aimed at restoring the children's relationship with the mother. As summarized by the appellate court: "Dr. Spirko made recommendations, including that the children be placed in Mother's sole custody with no contact with Father for at least 90 days. During the 90-day period, the children and Mother should participate in family reunification therapy and Father should participate in individual psychotherapy." The evaluator further recommended that any restoration of contact between the father and the children occur only after the father demonstrated behavioral change through treatment and compliance with court-ordered conditions: "Dr. Spirko recommended that Father complete a domestic violence intervention program and that the children's contact with Father be restored only after he met a list of conditions, including a progress report from Father's treating therapist."

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<sup>6</sup> *Sposato v. Sposato*, 2025 WL 2887174 (Pa. Super. Ct. 2025)

<sup>7</sup> *Toomey v. Toomey*, 2012 WL 2899308 (Conn. Super. Ct. 2012)

<sup>8</sup> *Woodward v. Woodward*, 2023 WL 7323285 (Ct. App. Tenn., 2023)

Thus, in *Woodward*, reunification therapy was not recommended as a stand-alone intervention aimed simply at repairing an alienated parent-child relationship. Rather, it was proposed as part of a broader corrective framework addressing what the evaluator identified as parental alienation as a tactic of coercive control by the father. The recommended intervention included (1) a temporary separation of the children from the alienating parent, (2) therapeutic work to restore the children’s relationship with the targeted parent, and (3) individual treatment requirements imposed on the alienating parent identified as the primary contributor to the alienation of the children from their mother. This structure reflects an important distinction in the judicial use of reunification therapy. The intervention was not intended to force children into contact with a rejected parent in the absence of systemic change. Instead, the evaluator recommended reunification therapy only within a structured corrective plan designed to address the underlying relational dynamics that had led to the breakdown of the targeted parent-child relationship.

### **Concluding Thoughts**

Taken together, these cases illustrate a recurring pattern in the judicial use of reunification therapy in parental alienation cases. Courts frequently order reunification therapy as the primary intervention while the child remains in the custody or primary influence of the alienating parent. Under those circumstances, the therapy is placed in direct conflict with the child’s ongoing exposure to the alienating parent’s negative influence, making therapeutic progress unlikely. As Darnall observed, alienating parents and severely alienated children often have “little or no desire to participate in the therapy” and may actively sabotage it. The case law demonstrates that reunification therapy rarely succeeds when it attempts to repair a parent-child relationship while the underlying alienation dynamic remains intact. In contrast, the few cases where alienation was successfully reversed involved structural interventions—such as temporary custody transfers, no-contact orders, or removal of the child from the alienating environment—that first eliminated the source of the alienation. The doctrinal lesson from these cases is clear: reunification therapy may serve as a supportive component of treatment, but it is not an effective remedy for ongoing parental alienation when the child continues to be exposed to the alienating parent’s influence. In such circumstances, reunification therapy is not merely ineffective—it is the wrong tool for the job. ■

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## About the Parental Alienation Study Group

Parental Alienation Study Group, Inc. (PASG) is an international, not-for-profit corporation. PASG has 937 members—mostly mental health and legal professionals—from 65 countries. The members of PASG are interested in educating the general public, mental health clinicians, forensic practitioners, attorneys, and judges regarding parental alienation. PASG members are also interested in developing and promoting research on the causes, prevention, evaluation, and treatment of parental alienation.

## About *Parental Alienation International*

*Parental Alienation International* (PAI) is published bimonthly by PASG. PAI seeks to lead and promote the scholarly discussion and debate concerning parental alienation practice, research, prevention, education, and advocacy to promote development of informed practice and policy in this field.

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