



Hello, Independent Regulatory Review Commission (IRRC)

Below are my written public comments about the State Board of Psychology Regulation #16A-6317: Continuing Education: Updates, revises, and clarifies continuing education requirements.

I recommend sharing this information with the PA State Board of Psychology and PA State Board of Social Workers, Marriage and Family Therapists and Professional Counselors.

We urge the boards and IRRC to introduce regulations to bring our Commonwealth into full compliance with the federal Kayden's Law standard. Federal Kayden's Law, enacted as part of the Violence Against Women Act Reauthorization, sets important mandates to psychologists, Social Workers, Marriage and Family Therapists, and Professional Counselors to be properly trained in the realities of domestic abuse and child victimization and to not engage in medical malpractice by prescribing, promoting, or providing Parental Alienation Theory/ Reunification therapy. This was adopted as Pennsylvania's Act 8 of 2024. A sample regulation language is attached to this letter.

Other states like DE and WA have decided to prosecute the Parental Alienation/ Reunification therapy providers for false advertising and medical malpractice, see links below:

<https://www.justice.gov/opa/pr/universal-health-services-inc-and-related-entities-pay-122-million-settle-false-claims-act>

<https://disabilityrightswa.org/cases/d-s-v-washington-state-department-of-children-youth-and-families/>

If you would like to talk more about this, please let me know.

Best regards,

Sincerely,

Harshal Dear

Pennsylvania Chapter Lead

Kayden's Korner and National Safe Parents Organization

860-754-7795

<https://kaydenskorner.com/>

<https://www.nationalsafeparents.org/>

BACKGROUND

The American Psychological Association has resolved that there is insufficient evidence to support the use of psychological interventions to treat “parental alienation” and encourages mental health professionals to avoid misrepresenting the efficacy of reunification therapy by promoting it when assisting individuals. Due to the lack of scientific evidence supporting Reunification therapy and the risk of harm to minors, the practice of reunification therapy is strongly opposed by the American Psychiatric Association and the American Psychological Association.

BOARD AUTHORITY

The Board has statutory authority to license, regulate and discipline psychologists in this Commonwealth. Under section 8(a)(9) of the act (63 P.S. § 1208(a)(9)), the Board is authorized to discipline a licensee for violating a regulation promulgated by the Board, including the Board’s ethical regulations under § 41.61 (relating to code of ethics). The Board is also authorized under section 8(a)(11) to discipline a licensee for engaging in immoral or unprofessional conduct.

TRAINING REQUIREMENT

Professionals must receive at least 60 hours of initial training on the topics in the listed curriculum, and at least 20 hours of this ongoing training every two years.

CUSTODY EVALUATOR REQUIREMENTS

At minimum, a professional must hold a Master’s degree in a relevant field and must have completed all other training requirements.

COURT EXPERTS

Professionals shall possess demonstrated expertise and clinical, not solely forensic, experience in working with victims of domestic violence or child abuse, including child sexual abuse.

CURRICULUM

The education and training requirement shall be designed to improve the ability of professionals to recognize and respond to child physical abuse, child sexual abuse, domestic violence, and trauma on all family victims, particularly children, and make appropriate decisions that prioritize child safety and well-being, and shall be culturally sensitive and appropriate for diverse communities

Training in domestic violence and child abuse, including—

- (i) child sexual abuse;
- (ii) physical abuse;
- (iii) emotional abuse;
- (iv) coercive control;
- (v) implicit and explicit bias;
- (vi) trauma;
- (vii) long and short-term impacts of domestic violence and child abuse on children; and
- (viii) victim and perpetrator behaviors.

TRAINING PROVIDERS.

Training must be provided by

- (i) professionals with substantial experience in assisting survivors of domestic violence or child abuse, such as a victim service provider; and
- (ii) where possible, survivors of domestic violence, or child physical or sexual abuse.

EVIDENCE-BASED RESEARCH.—

(i) **IN GENERAL.**—The education and training requirement shall rely on evidence-based and peer-reviewed credible scientific research by recognized experts in the types of abuse listed in the curriculum.

This research shall be generally accepted in the field with sufficient proof of the safety, effectiveness and therapeutic value of the particular treatment

(ii) **EXCLUSION.**—The education and training requirement shall not recognize theories, concepts, and belief systems (such as “reunification treatment”) that are unsupported by valid, credible scientific research. And any professionals claiming to provide, providing or prescribing such treatments or therapies shall be deemed as engaging in medical malpractice. In a disciplinary action brought against a licensee, the Board may find the use of Reunification Therapy and Parental Alienation Theory on an individual under 18 years of age to be unethical, immoral, or unprofessional conduct. A licensee who uses Reunification Therapy and Parental Alienation Theory on an individual under 18 years of age may be subject to discipline by the Board.

Authority

The provisions of this section should be added under sections 3.2(2) and 8(a)(11) of the Professional Psychologists Practice Act (63 P.S. § § 1203.2(2) and 1208(a)(11)).

Source

The provisions of this section should be added on a future date , effective upon publication in the *Pennsylvania Bulletin*.

- (4) develop an evaluation process that measures rates of cybercrime victimization and prosecutorial rates among Tribal and culturally specific communities. Evaluation.
- (c) CLASSIFICATION OF CYBERCRIMES AGAINST INDIVIDUALS FOR PURPOSES OF CRIME REPORTS.—In accordance with the authority of the Attorney General under section 534 of title 28, United States Code, the Director of the Federal Bureau of Investigation shall—
- (1) design and create within the Uniform Crime Reports a category for offenses that constitute cybercrimes against individuals;
- (2) to the extent feasible, within the category established under paragraph (1), establish subcategories for each type of cybercrime against individuals that is an offense under Federal or State law;
- (3) classify the category established under paragraph (1) as a Part I crime in the Uniform Crime Reports; and
- (4) classify each type of cybercrime against individuals that is an offense under Federal or State law as a Group A offense for the purpose of the National Incident-Based Reporting System.
- (d) ANNUAL SUMMARY.—The Attorney General shall publish an annual summary of the information reported in the Uniform Crime Reports and the National Incident-Based Reporting System relating to cybercrimes against individuals, including an evaluation of the implementation process for the national strategy developed under subsection (b) and outcome measurements on its impact on Tribal and culturally specific communities. Publication.
Evaluation.

TITLE XV—KEEPING CHILDREN SAFE FROM FAMILY VIOLENCE

SEC. 1501. SHORT TITLE.

This title may be cited as the “Keeping Children Safe From Family Violence Act” or “Kayden’s Law”.

SEC. 1502. FINDINGS.

Congress finds the following:

- (1) Approximately 1 in 15 children is exposed to domestic violence each year.
- (2) Most child abuse is perpetrated in the family and by a parent. Intimate partner violence and child abuse overlap in the same families at rates between 30 and 60 percent. A child’s risk of abuse increases after a perpetrator of intimate partner violence separates from a domestic partner, even when the perpetrator has not previously directly abused the child. Children who have witnessed intimate partner violence are approximately 4 times more likely to experience direct child maltreatment than children who have not witnessed intimate partner violence.
- (3) More than 75 percent of child sexual abuse is perpetrated by a family member or a person known to the child. Data of the Department of Justice shows that family members are 49 percent, or almost half, of the perpetrators of crimes against child sex assault victims younger than 6 years of age.
- (4) Research suggests a child’s exposure to a batterer is among the strongest indicators of risk of incest victimization.

Keeping Children
Safe From
Family Violence
Act.
Courts.
34 USC 10101
note.

34 USC 10446
note.

One study found that female children with fathers who are batterers of their mothers were 6.5 times more likely to experience father-daughter incest than female children who do not have abusive fathers.

(5) Child abuse is a major public health issue in the United States. Total lifetime financial costs associated with just 1 year of confirmed cases of child maltreatment, including child physical abuse, sexual abuse, psychological abuse, and neglect, result in \$124,000,000,000 in annual costs to the economy of the United States, or approximately 1 percent of the gross domestic product of the United States.

(6) Empirical research indicates that courts regularly discount allegations of child physical and sexual abuse when those allegations are raised in child custody cases. Courts believed less than $\frac{1}{4}$ of claims that a father has committed child physical or sexual abuse. With respect to cases in which an allegedly abusive parent claimed the mother “alienated” the child, courts believed only 1 out of 51 claims of sexual molestation by a father. Independent research indicates that child sexual abuse allegations are credible between 50 and 70 percent of the time.

(7) Empirical research shows that alleged or known abusive parents are often granted custody or unprotected parenting time by courts. Approximately $\frac{1}{3}$ of parents alleged to have committed child abuse took primary custody from the protective parent reporting the abuse, placing children at ongoing risk.

(8) Researchers have documented nearly 800 child murders in the United States since 2008 committed by a divorcing or separating parent. More than 100 of these child murders are known to have occurred after a court ordered the child to have contact with the dangerous parent over the objection of a safe parent or caregiver.

(9) Scientifically unsound theories that treat abuse allegations of mothers as likely false attempts to undermine fathers are frequently applied in family court to minimize or deny reports of abuse of parents and children. Many experts who testify against abuse allegations lack expertise in the relevant type of alleged abuse, relying instead on unsound and unproven theories.

(10) Judges presiding over custody cases involving allegations of child abuse, child sexual abuse, and domestic violence are rarely required to receive training on these subjects, and most States have not established standards for such training.

34 USC 10446
note.

SEC. 1503. PURPOSES.

The purposes of this title are to—

(1) increase the priority given to child safety in any State court divorce, separation, visitation, paternity, child support, civil protection order, or family custody court proceeding affecting the custody and care of children, excluding child protective, abuse, or neglect proceedings and juvenile justice proceedings;

(2) strengthen the abilities of courts to—

(A) recognize and adjudicate domestic violence and child abuse allegations based on valid, admissible evidence; and

(B) enter orders that protect and minimize the risk of harm to children; and

(3) ensure that professional personnel involved in cases containing domestic violence or child abuse allegations receive trauma-informed and culturally appropriate training on the dynamics, signs, and impact of domestic violence and child abuse, including child sexual abuse.

SEC. 1504. INCREASED FUNDING FOR STOP GRANTS.

Section 2007 of title I of the Omnibus Crime Control and Safe Streets Act of 1968 (34 U.S.C. 10446) is amended by adding at the end the following:

“(k) GRANT INCREASES FOR STATES WITH CERTAIN CHILD CUSTODY PROCEEDING LAWS AND STANDARDS.—

“(1) DEFINITIONS.—In this subsection:

“(A) CHILD CUSTODY PROCEEDING.—The term ‘child custody proceeding’—

“(i) means a private family court proceeding in State or local court that, with respect to a child, involves the care or custody of the child in a private divorce, separation, visitation, paternity, child support, legal or physical custody, or civil protection order proceeding between the parents of the child; and

“(ii) does not include—

“(I) any child protective, abuse, or neglect proceeding;

“(II) a juvenile justice proceeding; or

“(III) any child placement proceeding in which a State, local, or Tribal government, a designee of such a government, or any contracted child welfare agency or child protective services agency of such a government is a party to the proceeding.

“(B) ELIGIBLE STATE.—The term ‘eligible State’ means a State that—

“(i) receives a grant under subsection (a); and

“(ii) has in effect—

“(I) each law described in paragraph (3);

“(II) the standards described in paragraph (4);

and

“(III) the training program described in paragraph (5).

“(C) REUNIFICATION TREATMENT.—The term ‘reunification treatment’ means a treatment or therapy aimed at reuniting or reestablishing a relationship between a child and an estranged or rejected parent or other family member of the child.

“(2) INCREASE.—

“(A) IN GENERAL.—The Attorney General shall increase the amount of a grant awarded under subsection (a) to an eligible State that submits an application under paragraph (6) by an amount that is not more than 10 percent of the average of the total amount of funding provided to the State under subsection (a) under the 3 most recent awards to the State.

“(B) TERM OF INCREASE.—An increase of a grant under subparagraph (A) shall be for 1 fiscal year.

“(C) RENEWAL.—An eligible State that receives an increase under subparagraph (A) may submit an application for renewal of the increase at such time, in such

manner, and containing such information as the Attorney General may reasonably require.

Time period.

“(D) LIMIT.—An eligible State may not receive an increase under subparagraph (A) for more than 4 fiscal years.

“(3) LAWS.—The laws described in this paragraph are the following:

“(A) A law that ensures that, with respect to a child custody proceeding in which a parent has been alleged to have committed domestic violence or child abuse, including child sexual abuse—

“(i) expert evidence from a court-appointed or outside professional relating to the alleged abuse may be admitted only if the professional possesses demonstrated expertise and clinical experience in working with victims of domestic violence or child abuse, including child sexual abuse, that is not solely of a forensic nature; and

“(ii) in making a finding regarding any allegation of domestic violence or child abuse, including child sexual abuse, in addition to any other relevant admissible evidence, evidence of past sexual or physical abuse committed by the accused parent shall be considered, including—

“(I) any past or current protection or restraining orders against the accused parent;

“(II) sexual violence abuse protection orders against the accused parent;

“(III) arrests of the accused parent for domestic violence, sexual violence, or child abuse; or

“(IV) convictions of the accused parent for domestic violence, sexual violence, or child abuse.

“(B) A law that ensures that, during a child custody proceeding—

“(i) a court may not, solely in order to improve a deficient relationship with the other parent of a child, remove the child from a parent or litigating party—

“(I) who is competent, protective, and not physically or sexually abusive; and

“(II) with whom the child is bonded or to whom the child is attached;

“(ii) a court may not, solely in order to improve a deficient relationship with the other parent of a child, restrict contact between the child and a parent or litigating party—

“(I) who is competent, protective, and not physically or sexually abusive; and

“(II) with whom the child is bonded or to whom the child is attached;

“(iii) a court may not order a reunification treatment, unless there is generally accepted and scientifically valid proof of the safety, effectiveness, and therapeutic value of the reunification treatment;

“(iv) a court may not order a reunification treatment that is predicated on cutting off a child from

a parent with whom the child is bonded or to whom the child is attached; and

“(v) any order to remediate the resistance of a child to have contact with a violent or abusive parent primarily addresses the behavior of that parent or the contributions of that parent to the resistance of the child before ordering the other parent of the child to take steps to potentially improve the relationship of the child with the parent with whom the child resists contact.

“(C) A law that requires judges and magistrates who hear child custody proceedings and other relevant court personnel involved in child custody proceedings, including guardians ad litem, best interest attorneys, counsel for children, custody evaluators, masters, and mediators to complete, with respect to the training program described in paragraph (5)—

“(i) not less than 20 hours of initial training; and

“(ii) not less than 15 hours of ongoing training every 5 years. Time period.

“(4) UNIFORM REQUIRED STANDARDS.—The standards described in this paragraph are uniform required standards that—

“(A) apply to any neutral professional appointed by a court during a child custody proceeding to express an opinion relating to abuse, trauma, or the behaviors of victims and perpetrators of abuse and trauma; and Applicability.

“(B) require that a professional described in subparagraph (A) possess demonstrated expertise and clinical experience in working with victims of domestic violence or child abuse, including child sexual abuse, that is not solely of a forensic nature. Requirement.

“(5) TRAINING AND EDUCATION PROGRAM.—The training program described in this paragraph is an ongoing training and education program that—

“(A) focuses solely on domestic and sexual violence and child abuse, including—

“(i) child sexual abuse;

“(ii) physical abuse;

“(iii) emotional abuse;

“(iv) coercive control;

“(v) implicit and explicit bias, including biases relating to parents with disabilities;

“(vi) trauma;

“(vii) long- and short-term impacts of domestic violence and child abuse on children; and

“(viii) victim and perpetrator behavior patterns and relationship dynamics within the cycle of violence;

“(B) is provided by—

“(i) a professional with substantial experience in assisting survivors of domestic violence or child abuse, including a victim service provider (as defined in section 40002 of the Violence Against Women Act of 1994 (34 U.S.C. 12291)); and

“(ii) if possible, a survivor of domestic violence or child physical or sexual abuse;

“(C) relies on evidence-based and peer-reviewed research by recognized experts in the types of abuse described in subparagraph (A);

“(D) does not include theories, concepts, or belief systems unsupported by the research described in subparagraph (C); and

“(E) is designed to improve the ability of courts to—

“(i) recognize and respond to child physical abuse, child sexual abuse, domestic violence, and trauma in all family victims, particularly children; and

“(ii) make appropriate custody decisions that—

“(I) prioritize child safety and well-being; and

“(II) are culturally sensitive and appropriate for diverse communities.

“(6) APPLICATION.—

“(A) IN GENERAL.—An eligible State desiring a grant increase under this subsection shall submit an application to the Attorney General at such time, in such manner, and containing such information as the Attorney General may reasonably require.

“(B) CONTENTS.—An application submitted by an eligible State under subparagraph (A) shall include information relating to—

“(i) the laws described paragraph (3);

“(ii) the standards described in paragraph (4); and

“(iii) the training program described in paragraph (5).

“(7) USE OF FUNDS.—An eligible State that receives a grant increase under paragraph (2)(A) shall use the total amount of the increase for the purposes described in subparagraph (C) or (D) of subsection (c)(4).

“(8) RULE OF CONSTRUCTION.—Nothing in this subsection shall be interpreted as discouraging States from adopting additional provisions to increase safe outcomes for children. Additional protective provisions are encouraged.

Time period.

“(9) AUTHORIZATION OF APPROPRIATIONS.—There are authorized to be appropriated to carry out this subsection \$5,000,000 for each of fiscal years 2023 through 2027.”.

SEC. 1505. SEXUAL ASSAULT SURVIVORS' RIGHTS.

Section 3772(a)(2) of title 18, United States Code, is amended—

(1) in subparagraph (B), by striking “; and” and inserting a semicolon;

(2) in subparagraph (C), by striking the period at the end and inserting “; and”; and

(3) by adding at the end the following new subparagraph:

“(D) be informed of the status and location of a sexual assault evidence collection kit.”.


SEC. 1506. GRANTS TO STATE AND TRIBAL COURTS TO IMPLEMENT PROTECTION ORDER PILOT PROGRAMS.

Part U of title I of the Omnibus Crime Control and Safe Streets Act of 1968 (34 U.S.C. 10461 et seq.) is amended—

34 USC
10463–10465.

(1) by redesignating sections 2103, 2104, and 2105 as sections 2104, 2105, and 2106, respectively; and

(2) by inserting after section 2102 the following:

 This page has been archived and is no longer being updated regularly.


Date created: 2008

Statement on Parental Alienation Syndrome

Parenting (/topics/parenting)

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The American Psychological Association believes that all mental health practitioners as well as law enforcement officials and the courts must take any reports of domestic violence in divorce and child custody cases seriously. An APA 1996 Presidential Task Force on Violence and the Family noted the **lack** of data to support so-called "parental alienation syndrome", and raised concern about the term's use. However, we have no official position on the purported syndrome.

The American Psychological Association, in Washington, D.C., is the largest scientific and professional organization representing psychology in the United States and is the world's largest association of psychologists. APA's membership includes more than 150,000 researchers, educators, clinicians, consultants and students. Through its divisions in 53 subfields of psychology and affiliations with 60 state, territorial and Canadian provincial associations, APA works to advance psychology as a science, as a profession and as a means of promoting human welfare.

 The content I just read:  IS HELPFUL  IS NOT HELPFUL

Contact

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Mini Pawashe <harshal.s.dear@gmail.com>

Statement on Parental Alienation Syndrome 2008

McLeod, Robin <RMcLeod@apa.org>

Wed, Oct 16, 2024 at 2:57 PM

To: Mini Pawashe <harshal.s.dear@gmail.com>, "Mills, Kim" <kmills@apa.org>

Cc: SM PMC Public Affairs <SPMCPublicAffairs@apa.org>, "Winerman, Lea" <lwinerman@apa.org>, "Sliwa, Jim" <JSliwa@apa.org>

Hello Mini,

APA does not have an updated statement beyond the formal statement found here: <https://www.apa.org/news/press/releases/2008/01/pas-syndrome>. APA groups have looked into this issue in the past and found inconsistent data with great variability in definitions used to research these questions resulting in inconsistent findings and challenges with interpreting results.

I direct you to the American Psychiatric Association who publishes the DSM-5-TR for questions regarding diagnosis: <https://www.psychiatry.org/psychiatrists/practice/dsm>.

With regard,

Robin

Robin McLeod, PhD, Licensed Psychologist

Senior Director for Strategic Relations and Leadership

APA Practice Directorate

<https://www.apa.org/practice/strategic-relations-leadership>email: rmcleod@apa.org

cell: 651-399-5674

From: Mini Pawashe <harshal.s.dear@gmail.com>**Sent:** Thursday, October 10, 2024 10:41 AM**To:** Mills, Kim <kmills@apa.org>; McLeod, Robin <RMcLeod@apa.org>**Cc:** SM PMC Public Affairs <SPMCPublicAffairs@apa.org>; Winerman, Lea <lwinerman@apa.org>; Sliwa, Jim <JSliwa@apa.org>**Subject:** Re: Statement on Parental Alienation Syndrome 2008

Hello Ms.Mills and Ms. McLeod,

I am just following up on this. would you be able to provide an update on the American Psychological Association's 2008 Statement on Parental Alienation Syndrome attached to this email and linked here: <https://www.apa.org/news/press/releases/2008/01/pas-syndrome>

Is "Parental Alienation Syndrome" a recognized diagnosis listed in the DSM-5-TR and is "Reunification Therapy" the recognized standard of care nationwide and globally?

Sincerely,

-Harshal Dear (Mini)

P...ania Chapter Lead

N... Safe Parents Organization

866-781-7795

<https://www.nationalsafeparents.org/>On Thu, Oct 3, 2024 at 1:15 PM Mills, Kim <kmills@apa.org> wrote:

Is this issue in your court now that Mary Hardiman is gone? If not, do you know who is handling?

From: Mini Pawashe <harshal.s.dear@gmail.com>
Sent: Thursday, October 3, 2024 11:46 AM
To: SM PMC Public Affairs <SPMCPublicAffairs@apa.org>
Cc: Mills, Kim <kmills@apa.org>; Winerman, Lea <lwinerman@apa.org>; Sliwa, Jim <JSliwa@apa.org>
Subject: Statement on Parental Alienation Syndrome 2008

Dear Public Affairs Team,

American Psychological Association,

I hope this letter finds you well. I am writing to kindly request an update on the American Psychological Association's 2008 Statement on Parental Alienation Syndrome attached to this email and linked here: <https://www.apa.org/news/press/releases/2008/01/pas-syndrome>

I am leading the Pennsylvania chapter of the National Safe Parents Organization. Advocating for evidence-based and science-backed policies that put child safety at the forefront of child custody decisions. We at NSPO are a national coalition of more than 100,000 survivor parents and concerned citizens in the United States. We believe it is a child's right to live free from abuse and that child safety, which is implicit in the law, must be made the top priority in practice, in all private custody decision-making. Children need the law to protect their interests in custody proceedings, especially those cases in which there are allegations of domestic violence. Far too often, courts overlook signs of abuse and rely on unscientific factors to make decisions that jeopardize a child's life.

We are working to pass legislation that would limit the use of reunification camps and therapies that cannot be proven to be safe and effective. No "reunification treatment" may be ordered by the court without scientifically valid and generally accepted proof of the safety, effectiveness, and therapeutic value of the particular treatment.

As this is an important and evolving issue, I would greatly appreciate any information or progress report regarding this statement. Or an updated statement from the American Psychological Association on Parental Alienation Syndrome and reunification therapy.

Thank you for your attention to this request. I look forward to your response and appreciate your prompt attention to this matter.

Sincerely,

-Harshal Dear (Mini)
Pennsylvania Chapter Lead
National Safe Parents Organization
860-754-7795
<https://www.nationalsafeparents.org/>

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Mini Pawashe <harshal.s.dear@gmail.com>

APA position on Parental Alienation Syndrome and Reunification Therapy

Alexa Haverlah <ahaverlah@psych.org>

Thu, Oct 17, 2024 at 3:29 PM

To: Mini Pawashe <harshal.s.dear@gmail.com>, DSM5 <dsm5@psych.org>, APA <APA@psych.org>

Cc: psychiatryonline <psychiatryonline@psych.org>, APA Communications Office <Press@psych.org>, Erin Connors <EConnors@psych.org>, "rcook@nextwavegroup.net" <rcook@nextwavegroup.net>, "info@papsych.org" <info@papsych.org>, "papsych@papsych.org" <papsych@papsych.org>, Ginnie Titterton <vtitterton@psych.org>

Hi Mini,

This statement should be attributed to the American Psychiatric Association, I should not be quoted:

DSM-5-TR does not include parental alienation as a separate diagnosis. With regards to the reunification therapy, DSM is a diagnostic manual and does not address or make treatment recommendations.

Alexa K. Haverlah, (she/ella)

Spanish Media Relations Specialist I Communications Division

American Psychiatric Association

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lasaludmental.org

#MenteSanaGenteSana

From: Mini Pawashe <harshal.s.dear@gmail.com>**Date:** Thursday, October 17, 2024 at 12:04 PM**To:** DSM5 <dsm5@psych.org>, APA <APA@psych.org>**Cc:** psychiatryonline <psychiatryonline@psych.org>, APA Communications Office <Press@psych.org>, Erin Connors <EConnors@psych.org>, rcook@nextwavegroup.net <rcook@nextwavegroup.net>, info@papsych.org <info@papsych.org>, papsych@papsych.org <papsych@papsych.org>**Subject:** APA position on Parental Alienation Syndrome and Reunification Therapy

APA WARNING: Verify external sender before clicking on links/attachments or sharing sensitive information.

Dear Public Affairs Team,
American Psychiatric Association,

I hope this letter finds you well. I am writing to kindly request for APA's formal position on "Parental Alienation Syndrome (PAS)" being used as a label for diagnosis and "Reunification Therapy" being used for treatment to force child abuse victims to have a relationship with their abusive parent, without addressing the rational fear of the minor towards the child abuse perpetrator parent or address the

behaviors of the child abuse perpetrator parent, presenting s an "alienated parent".

Is "Parental Alienation Syndrome" a recognized diagnosis listed in the DSM-5-TR and is "Reunification Therapy" the recognized "standard of care modality" nationwide and globally?

I am leading the Pennsylvania chapter of the National Safe Parents Organization. Advocating for evidence-based and science-backed policies that put child safety at the forefront of child custody decisions. We at NSPO are a national coalition of more than 100,000 survivor parents and concerned citizens in the United States. We believe it is a child's right to live free from abuse and that child safety, which is implicit in the law, must be made the top priority in practice, in all private custody decision-making. Children need the law to protect their interests in custody proceedings, especially those cases in which there are allegations of domestic violence. Far too often, courts overlook signs of abuse and rely on unscientific factors to make decisions that jeopardize a child's life. We are working to pass legislation that would limit the use of reunification camps and therapies that cannot be proven to be safe and effective. No "reunification treatment" may be ordered by the court without scientifically valid and generally accepted proof of the safety, effectiveness, and therapeutic value of the particular treatment.

As this is an important and evolving issue, I would greatly appreciate any information or progress report regarding this statement. Thank you for your attention to this request. I look forward to your response and appreciate your prompt attention to this matter.

Sincerely,

-Harshal Dear (Mini)

Pennsylvania Chapter Lead

National Safe Parents Organization

860-754-7795

https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.nationalsafeparents.org%2f&c=E,1,jMnv41cdJoJXJo_AuaLLUs2PkjlX8Ei6_YuZAAXIIDDzkx8NzIG0zMJ1eJofXmeOhOLdIBzMCjSuSn6FeEP8WcjYGkjyBFj5k6GWB5GDBR0,&typo=1