
People with Cognitive Disabilities: The Argument from Marginal Cases and Social Work Ethics

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A primary argument used by animal rights advocates to engage the public in questioning our maltreatment of animals is the Argument from Marginal Cases (AMC). It is important that social workers are aware of this argument, because it has the potential to diminish our consideration of people with severe cognitive disabilities. This article provides a brief overview of the argument, followed by a description of the means by which people with cognitive disabilities have been denigrated over the past century through animalistic rhetoric and negative comparisons with animals. The "animalization" of marginalized groups of all types has often served to reinforce and justify dehumanizing treatment of group members. Questions related to the logic of the AMC are raised, and the importance of the argument for the social work community is discussed.

Key words: *animalization; cognitive disabilities; marginalized groups; social work ethics*

"What if an ape had the intelligence and sensibilities of a human, and a human had only the capabilities of an ape? Which would be the human being? The answer is plain; the ape would be the human being" (Fletcher, 1976, p. 62).

Beginning with Singer's early writings on animal liberation in the 1970s, the Argument from Marginal Cases (AMC) has been an important philosophical argument buttressing calls for increased public consideration of animal rights. In January 2000 *Social Work* introduced its readers to this issue in a commentary by Wolf (2000) entitled "Social Work and Speciesism." Although Wolf did not discuss the AMC in depth, such an exploration is important for social workers. Proffered by animal rights proponents over the past few decades, the AMC has the potential to denigrate the status of many of the groups to which the social work profession should be most committed. By comparing "marginal" humans to animals, the AMC may unwittingly dehumanize

people with cognitive disabilities and be yet another way our society justifies maltreatment of its most vulnerable members.

Speciesism and the Argument from Marginal Cases

Singer (1975) initiated what would later become known as the Argument from Marginal Cases in his book *Animal Liberation*, often referred to as the "bible" of the animal rights movement. In the book Singer argued that "if we examine more deeply the basis on which our opposition to discrimination on grounds of race or sex ultimately rests, we will see that we would be on shaky ground if we were to demand equal rights for blacks, women, and other groups of oppressed humans while denying equal consideration to nonhumans" (p. 3). According to Singer and many other animal rights scholars, there is no morally defensible justification for protecting *marginal humans* (those with severe cognitive

disabilities) while perpetuating abuse or neglect against nonhuman animals if both function at similar “intellectual” levels (Anstötz, 1993; Dombrowski, 1997; Pluhar, 1995; Ryder, 1991; Singer, 1975, 1979). As Frey (1983) wrote, “[I]f the value of a life is a function of its quality, then as its quality diminishes, its value diminishes.” In cases of severe mental disability, he continues, the “quality and value of human life . . . can approach and even fall below the quality of life of some quite ordinary animals” (p. 111). To provide moral consideration to the former only because they are members of the species *Homo sapiens*, it is argued, is “speciesist” and “homocentrist” (Pluhar; Ryder).

Animal rights proponents especially view the great apes (that is, gorillas, chimpanzees, and orangutans) as deserving of enhanced moral status (Cavaliere & Singer, 1993). The communication experiments with Washoe, Koko, and other apes reinforced the notion that these animals engage in a degree of rational thought. Patterson and Linden (1981) noted that in IQ tests they administered to Koko, she “scored consistently in the 70 to 90 range” (p. 127). This exceeds the IQ of virtually all people diagnosed as having mental retardation. The kinship of humans to apes, as characterized not only by taxonomic standing, but also by the fact that we share more than 98 percent of our genetic structure with them, has also been cited as justification for the enhanced moral consideration of these other simians (Goodall, 1993; Pluhar, 1995).

Although used to support vegetarianism and make a case against a host of animal rights abuses, the AMC has been most useful to opponents of animal experimentation. A century ago, writing in the *International Journal of Ethics*, Salt (1899–1900) noted that

It may be asked of the great bulk of physiologists, who indignantly repudiate the idea of vivisectioning human beings, but are equally emphatic in their justification of experiments on animals, on what grounds they base this difference in their ethical principles? . . . If a mere difference in *degree* of sensibility and intelligence is held to be the justification, there must be equal sanction for the sacrifice of a savage or a criminal. [*italics in original*] (p. 219)

To quote Kushner and Belliotti (1985), it should be “morally permissible to use non-hu-

mans for research, experiment, and operations if and only if we would feel morally justified in using an adult human of equal cognitive capacity for the same research, experiment or operation” (p. 180). Some animal rights advocates, moreover, have noted that experiments on devalued humans may be an attractive alternative to animal-based research because the results gained from the former are obviously more generalizable to humans as a whole (Frey, 1983; Nelson, 1988; Pluhar, 1995; Singer, 1975, 1979, 1989).

Animal rights scholars who appeal to the AMC appear to be genuinely interested in invoking the argument to enhance the moral standing of the great apes and other “higher functioning” animals, and largely discount the contention that the argument might have the reversible effect of dehumanizing vulnerable members of the human species (Dombrowski, 1997; Pluhar, 1995). Singer (1979), for example, wrote, “[I]t is also important to remember that the aim of my argument is to elevate the status of animals rather than to lower the status of any humans” (p. 68). Even a cursory historical investigation of the ways in which people with mental retardation and other cognitive disabilities have been viewed in our society, however, should give us pause when considering whether the AMC may have the effect of harming marginal humans as opposed to enhancing the rights of nonhuman animals.

Animalization of People with Cognitive Disabilities in Historical Perspective

Of all marginalized groups, surely those with severe cognitive impairments are among the most vulnerable to being “animalized.” The taxonomic status of people with mental disabilities, especially “feeble-mindedness” or mental retardation, has been a topic of intense debate for centuries (Gelb, 1995). Mott (1894) noted that in many cultures idiots were classified as brutes, or animals. In 1873 the British physician Henry Maudsley (cited in Skultans, 1975) wrote that in some people the brain stopped short of its full human development and “remains arrested at or below the level of an orang[utan]’s brain” (p. 246). “With the brain of the orang type,” added Talbot (1898/1984), “comes a corresponding defect of function. With this animal type of brain in idiocy sometimes appear animal traits and instincts” (p. 17). In *The Great Chain of Being*, Lovejoy (1966) quoted Locke as writing that “there are some

brutes that seem to have as much reason and knowledge as some that are called men” (p. 184).

Especially after publication of Darwin’s *Origin of the Species*, public fascination with the “missing link” and the humans that seemingly provided a connection with our atavistic ancestors grew and provided a cottage industry for those willing to capitalize on this interest (Bogdan, 1986; Ritvo, 1995). The use of people with microcephaly and other disability conditions in carnival sideshows, as well as the use of “deformed” infants in “incubator-baby sideshows,” served to force the public to question whether such entities could be considered fully human (Bogdan; Weir, 1984). According to Bogdan, “the association of various human differences with danger, inferiority, subhuman characteristics, and animal traits was developed as well as perpetuated by these exhibits” (p. 125). Public interest in entities that seem to fall within the border separating the human and the nonhuman can also be seen in the centuries-old lore of feral children. Bonnaterre (cited in Lane, 1976), for example, one of the first professionals to study Victor, the “Wild Boy of Aveyron,” wrote “if it were not for his human face, what would distinguish him from the apes?” Victor, Bonnaterre continued, “is truly and purely an animal, . . . what enormous barriers separate him from us!” (p. 53).

The animalization of people with feeble-mindedness was perhaps most pronounced during the eugenic alarm period, when widespread institutionalization and sterilization were felt to be necessary means of controlling the procreation of the “moron” class (Gould, 1981; Kevles, 1985; O’Brien, 1999; Trent, 1994). Charles Davenport (1912), the leader of the eugenics movement in the United States, wrote that “there are persons who range in intellectual capacity all the way from the most effective and the most cultured to those who have less intelligence than many apes” (p. 281), and he advocated the “elimination of the worst mating of animalistic strains” (p. 282). In 1901 Duncan McKim, one of the few advocates of eugenic control to openly favor euthanasia of those with severe cognitive disabilities, wrote in favor of painlessly killing these “beings with less intelligence than the goose, with less decency than the pig” (p. 128). Feeble-minded people were viewed as animalistic entities because of their purportedly high procreation rates, their inability to live cultured lives, their presumed insensitivity to

pain, their propensity for immoral and criminal behavior, and their instinctual rather than rational nature (Barr, 1902; Bicknell, 1895–1896; Galton, 1907; Goddard, 1912; Kite, 1913; Stoddard, 1923).

In the United States and Nazi Germany, eugenic measures that were taken against people with cognitive disabilities were reinforced by comparing these people to animals, as well as by the wide-ranging use of animalistic metaphors to describe them (O’Brien, 1999). Binding and Hoche (1992), whose 1920 treatise on euthanasia influenced Hitler (1925/1971), wrote that “the mentally dead [idiots] stand on an *intellectual* plane that we first discover only far down in the animal kingdom; only their emotional movements do not rise above the level of elementary processes bound to animal life” [italics in original] (p. 262). In *Mein Kampf*, Hitler discussed “monstrosities” who were “halfway between man and ape” (p. 402).

The U.S. eugenicist Lothrop Stoddard (1940), observing a German court that reviewed potential candidates for sterilization under the Nazi’s 1933 law, felt that the first case he saw was an excellent candidate for the procedure, in part because the man was “rather ape-like in appearance” (p. 193). The dehumanization of people with severe disabling conditions was formalized in Nazi Germany by means of widely distributed motion pictures that depicted institutionalized people as living animalistic lives (Burleigh, 1994). This is certainly not to imply that animal rights advocates are modern-day Nazis, but rather that the use of animalizing rhetoric to describe specific “out-groups” often coexists with and reinforces the maltreatment of group members, and this is nowhere seen as clearly as in Hitler’s Germany (O’Brien, 1999).

That many contemporary and historical institutions have resembled zoos should not be surprising considering that the mask of the animal has often been projected onto the face of the “idiot” and the “lunatic” (Blatt, 1970; Foucault, 1965/1988; Rivera, 1972). In calling for state-supported institutional development, Dorothea Dix, before the Massachusetts legislature, discussed the results of her review of insane people who were “cared for” within almshouses and through the process of “bidding out.” Dix’s (1976) description is replete with examples of animalistic treatment of these people. The early practice of charging visitors an admission fee to gawk at and tease

asylum residents has been widely reported in the literature (Deutsch, 1938; Scheerenberger, 1983). As Wolfensberger (1972) noted, many of the treatment methods for people with mental retardation have an implication of animality. Often, he wrote, the “too ready recourse to severe aversive stimulation when dealing with the profoundly retarded may well derive from an unconscious perception of these individuals as nonhuman” (p. 19).

The frequent use of people with cognitive disabilities for experimental purposes has furthered the view that such individuals have little value to society and can therefore be treated as guinea pigs (Beecher, 1970). One of the more egregious examples occurred during the 1950s and 1960s in Willowbrook, an infamous New York facility wherein a hepatitis experiment was conducted on many of its residents. These experiments included purposefully inoculating new residents with a strain of hepatitis, after which they naturally contracted the disease (Annas & Grodin, 1992). Medical personnel who were involved in the study rationalized that the project was ethical because the subjects would probably have become infected anyway, because of the high hepatitis rate at the institution (Krugman, Giles, & Hammond, 1967). Far from decrying the study, the *New England Journal of Medicine* published the results, along with an editorial stating that the research was “an important contribution to our knowledge of hepatitis that would have been impossible without the judicious use of human beings in carefully controlled experimental studies” (“Is serum hepatitis,” 1967, p. 137).

Questioning the full humanity of people with cognitive disabilities continues to be widespread, and is often used to sanction maltreatment and neglect. Some, such as Fletcher (1979), have argued that if “personhood” is defined by communication skills, self-awareness, intellectual capability, or the ability to form relationships, some humans fall short of the mark. Shaw (1988) argued that the decision to treat or not treat a severely disabled newborn should be based on a quality-of-life determination that includes a consideration of familial and societal resources. Under such a program, severely impaired infants whose families live in poverty or who were abandoned might not be deemed appropriate recipients of certain types of life-saving surgical intervention.

Singer (1979), in addition to his advocacy for animal rights, has written that in some cases infanticide is an acceptable practice for severely disabled newborns. In *Practical Ethics*, he argued that killing severely disabled infants “cannot be equated with killing normal human beings, or any other self-conscious beings” (p. 131). Specter (1999) wrote that “Singer uses the word ‘person’ to refer to self-conscious creatures,” and that while “animals often fit that definition, . . . many humans do not” (p. 48). With genetic advances and the eventual completion of the Human Genome Project, we can reasonably assume that questions about the rights of people with disabilities will increase.

Speciesist Foundation of the AMC: Why Doesn't Anyone Talk about Marginal Apes?

By focusing specifically on individuals with the least intellectual capability, proponents of the AMC have exploited the variety that exists in our species to blur the line between human beings and our closest nonhuman relations. When discussing nonhumans, however, individuality is important only to show the extraordinary efforts of highly successful great apes, such as Koko. The focus on the most intellectually deficient humans and the most endowed nonhumans is obviously meant to obscure the “bridge” between the species. Animal rights proponents, however, do not highlight the problems that arise when considering “marginal” apes. There is reason to accept that wide variation in intellectual functioning or any other characteristic exists in nonhuman species, especially if the great apes are so similar to humans in other respects. Animal rights proponents, however, include all members of selected nonhuman species for rights inclusion, not just those with the highest mental functioning.

Even if it is accepted that great apes should be treated with a greater degree of moral consideration because many have abilities equal to or surpassing those of marginal humans, should not other selected species (for example, dolphins, pigs, dogs, and the like) also be included as rights holders if the general abilities of their “higher” members surpass those of intellectually impaired chimpanzees, gorillas, or orangutans? To not provide such consideration would obviously be a form of speciesism as blatant as that derided by AMC proponents. The Great Ape Project, the most important organization focusing on the

rights of simians, is characteristic of the speciesist nature of the AMC. This international organization calls for “the removal of the nonhuman great apes from the category of property, and for their immediate inclusion within the category of *persons*” [italics in original] (“Great Ape Project”). Furthermore, the long-term goal of the group is “a United Nations Declaration of the Rights of Great Apes.” Included in the “community of equals,” along with humans, would be chimpanzees, gorillas, and orangutans. With pygmy chimpanzees, these nonhuman species make up the family pongidae. The line, therefore, is neatly drawn at the family level, leaving out gibbons, macaques, baboons, mandrills, colobus, and numerous species of monkeys. If it is arbitrary and philosophically unsupportable, however, to draw the line for rights consideration at the species level, it makes sense to ask why it is appropriate to draw it at any taxonomic level. To quote Zak (1991),

Where, one might wonder, should the line be drawn? Must we treat dragonflies the same as dolphins? Surely not. Distinctions must be made, though to judge definitely which animals must be ruled out as holders of rights may be impossible even in principle. In legal or moral discourse we are virtually never able to draw clear lines. This does not mean that drawing a line anywhere, arbitrarily, is as good as drawing one anywhere else. (p. 29)

Although Zak wrote within the context of espousing simian rights, his argument could easily be used by opponents. As noted, the lines for “moral consideration” drawn by animal rights advocates are as arbitrary as any other lines.

In the end, the only way to argue against speciesism in any consistent manner is by providing each member of each species that may have some members with “morally relevant” characteristics (for example, ability to relate to others, self-awareness, communicative ability, and altruism) a degree of consideration that is uniquely based on the individual’s possession of those qualities, without regard for species membership. This necessitates widespread agreement regarding what those morally relevant characteristics should be and how they “rank” in comparison with each other, as well as an accurate means of measuring the existence of those qualities across all relevant species.

Ethical Implications for Social Workers

As noted, an important concern related to the AMC is its potential for animalizing humans with severe cognitive disabilities. Equating humans who are labeled as intellectually disabled with animals has been a recurrent historical theme. Moreover, once a particular society accepts that its more vulnerable members can be rightly viewed as animalistic entities, the duty to treat such people humanely may be moderated or eliminated (Wolfensberger, 1992). von Maltitz (1973) wrote that “the equating of man and animal” has often “represented an effort to justify the ruthless treatment” of one’s enemies (p. 62). Ritvo (1995) added that people “who are compared to animals may also be treated like them. . . . Indeed, in some cases, borderline humans could seem less worthy than animals” (p. 497).

Many scholars, including Brennan (1995), Keen (1986), Noël (1989/1994), Smith (1994), and Wolfensberger (1992) have noted that, historically, discrimination against women, racial and ethnic minority groups, people with psychiatric disorders, and other out groups has often been justified by comparing certain characteristics of group members to animals or portraying those composing the group as quasi-human entities. According to these authors, philosophical arguments and the use of pejorative rhetoric that calls into question the full humanness of group members often paves the way for and desensitizes the public to inhumane treatment directed against such groups (O’Brien, 1999). Nicole Rafter (1988) noted that the animalistic images eugenicists used to describe feeble-minded people led to the implication that such people would barely notice “if they were treated as less than human.” (p. 26).

Seeking to engage the public in questioning our consideration and treatment of animals is fine, as long as vulnerable humans are not harmed in the process. Unfortunately, the animal rights movement, invested as it is in the AMC, cannot guarantee this. As it is described in the writings of animal rights scholars, the AMC is in opposition to core social work values and must be vigorously challenged by members of the profession. The dignity and worth of people living on the margins of society is diminished when we bestow quasi-human status on them or suggest that their moral standing is comparable to animals. Any suggestion that such people be engaged in potentially harmful experimentation without their full

knowledge and consent is opposed by our duty to safeguard the interests of at-risk populations (NASW, 2000). Our duties to “advocate for living conditions conducive to the fulfillment of basic human needs” (pp. 26–27, 6.01), to ensure access to necessary resources, and to “expand choice and opportunity” (6.04b) for vulnerable populations also may be compromised by the AMC. As history demonstrates, animalistic views of vulnerable groups often pave the way for their animalistic treatment. Such treatment diminishes living standards, the provision of basic rights and financial and other resources, and the life opportunities afforded group members. It is incumbent on social workers to fight invidious stereotypes of marginal groups, especially vulnerable populations whose members have less capability to engage in consumer advocacy, such as people with severe mental disabilities. ■

References

- Annas, G. J., & Grodin, M. A. (1992). *The Nazi doctors and the Nuremberg Code*. New York and Oxford: Oxford University Press.
- Anstötz, C. (1993). Profoundly intellectually disabled humans and the great apes: A comparison. In P. Cavalieri & P. Singer (Eds.), *The Great Ape Project: Equality beyond humanity* (pp. 158–172). New York: St. Martin’s Press.
- Barr, M. W. (1902). The imbecile and epileptic versus the tax-payer and the community. *Proceedings of the National Conference on Charities and Corrections* (pp. 161–165). Boston: Geo. H. Ellis.
- Beecher, H. K. (1970). *Research and the individual*. Boston: Little, Brown.
- Bicknell, E. P. (1895–1896). Custodial care of the adult feeble-minded. *Charities Review*, 5, 76–88.
- Binding, K., & Hoche, A. (1992). Permitting the destruction of unworthy life: Its extent and form. *Issues in Law and Medicine*, 8, 231–265. (Original work published 1920)
- Blatt, B. (1970). *Exodus from pandemonium*. Boston: Allyn & Bacon.
- Bogdan, R. (1986). Exhibiting mentally retarded people for amusement and profit, 1850–1940. *American Journal of Mental Deficiency*, 91(2), 120–126.
- Brennan, W. (1995). *Dehumanizing the vulnerable: When word games take lives*. Chicago: Loyola University Press.
- Burleigh, M. (1994). *Death and deliverance: Euthanasia in Germany 1900–1945*. Cambridge, England: Cambridge University Press.
- Cavalieri, P., & Singer, P. (Eds.). (1993). *The Great Ape Project: Equality beyond humanity*. New York: St. Martin’s Press.
- Davenport, C. B. (1912). Eugenics and charity. In *Proceedings of the National Conference on Charities and Corrections* (pp. 280–282). Fort Wayne, IN: Fort Wayne Printing.
- Deutsch, A. (1938). *The mentally ill in America: A history of their care and treatment from colonial times*. Garden City, NY: Doubleday.
- Dix, D. (1976). Memorial to the legislature of Massachusetts, 1843. In M. Rosen, G. R. Clark, & M. S. Kivitz (Eds.), *The history of mental retardation: Collected papers, Volume I* (pp. 4–30). Baltimore: University Park Press. (Original work published 1843)
- Dombrowski, D. A. (1997). *Babies and beasts: The argument from marginal cases*. Urbana: University of Illinois Press.
- Fletcher, J. (1976). Genetic engineering. In N. C. Ostheimer & J. M. Ostheimer (Eds.), *Life or death: Who controls?* (pp. 60–63). New York: Springer.
- Fletcher, J. (1979). *Humanhood: Essays in biomedical ethics*. Buffalo, NY: Prometheus Books.
- Foucault, M. (1988). *Madness and civilization* (R. Howard, Trans.). New York: Vintage Books. (Original work published 1965)
- Frey, R. G. (1983). *Rights, killing, and suffering: Moral vegetarianism and applied ethics*. Oxford, England: Basic Blackwell.
- Galton, F. (1907). *Inquiries into human faculty and its development*. New York: E. P. Dutton.
- Gelb, S. A. (1995). The beast in man: Degeneration and mental retardation, 1900–1920. *Mental Retardation*, 33(1), 1–9.
- Goddard, H. H. (1912). *The Kallikak family*. New York: Macmillan.
- Goodall, J. (1993). Chimpanzees—Bridging the gap. In P. Cavalieri & P. Singer (Eds.), *The Great Ape Project: Equality beyond humanity* (pp. 10–18). New York: St. Martin’s Press.
- Gould, S. J. (1981). *The mismeasure of man*. New York: W.W. Norton.
- Great Ape Project. Retrieved June 28, 2000, from www.greatapeproject.org/gaphome.html.
- Hitler, A. (1971). *Mein Kampf* (R. Manheim, Trans.). Boston: Houghton Mifflin. (Original work published 1925)
- Is serum hepatitis only a special type of infectious hepatitis? (1967). *JAMA*, 200, 136–137.
- Keen, S. (1986). *Faces of the enemy: Reflections of the hostile imagination*. San Francisco: Harper & Row.
- Kevles, D. J. (1985). *In the name of eugenics*. New York: Alfred A. Knopf.
- Kite, E. (1913). The “Piney’s.” *Survey*, 31(1), 7–13.
- Krugman, S., Giles, J. P., & Hammond, J. (1967). Infectious hepatitis: Evidence for two distinctive clinical, epidemiological, and immunological types of infection. *JAMA*, 200, 95–103.
- Kushner, T., & Belliotti, R. (1985). Baby Fae: A beastly business. *Journal of Medical Ethics*, 11(4), 178–183.

- Lane, H. (1976). *The wild boy of Aveyron*. New York: Bantam Books.
- Lovejoy, A. (1966). *The great chain of being*. Cambridge, MA: Harvard University Press.
- McKim, W. D. (1901). *Heredity and human progress*. New York: G. P. Putnam's Sons.
- Mott, A. J. (1894). The education and custody of the imbecile. *Proceedings of the National Conference on Charities and Corrections* (pp. 168–179). Boston: Geo. H. Ellis.
- National Association of Social Workers. (2000). *Code of ethics of the National Association of Social Workers*. Washington, DC: Author.
- Nelson, J. L. (1988). Animals, handicapped children and the tragedy of marginalized cases. *Journal of Medical Ethics*, 14, 191–193.
- Noël, L. (1994). *Intolerance: A general survey* (A. Bennett, Trans.). Montreal: McGill-Queen's University Press. (Original work published 1989)
- O'Brien, G. V. (1999). Protecting the social body: Use of the organism metaphor in fighting the "menace of the feeble-minded." *Mental Retardation*, 37, 188–200.
- Patterson, F., & Linden, E. (1981). *The education of Koko*. New York: Holt, Rinehart and Winston.
- Pluhar, E. (1995). *Beyond prejudice: The moral significance of human and nonhuman animals*. Durham, NC: Duke University Press
- Rafter, N. (1988). *White trash: The eugenic family studies, 1877–1919*. Boston: Northeastern University Press.
- Ritvo, H. (1995). Border trouble: Shifting the line between people and other animals. *Social Research*, 62, 481–500.
- Rivera, R. (1972). *Willowbrook*. New York: Random House.
- Ryder, R. (1991). Speciesism. In R. M. Baird & S. E. Rosenbaum (Eds.), *Animal experimentation: The moral issues* (pp. 35–42). Amherst, NY: Prometheus Books.
- Salt, H. S. (1899–1900). The rights of animals. *International Journal of Ethics*, 10, 206–222.
- Scheerenberger, R. C. (1983). *A history of mental retardation*. Baltimore: Paul H. Brookes.
- Shaw, A. (1988). QL revisited. *Hastings Center Report*, 18(2), 10–12.
- Singer, P. (1975). *Animal liberation: A new ethics for our treatment of animals*. New York: Avon Books.
- Singer, P. (1979). *Practical ethics*. Cambridge, England: Cambridge University Press.
- Singer, P. (1989). All animals are equal. In T. Regan & P. Singer (Eds.), *Animal rights and human obligations* (rev. ed., pp. 73–83). Englewood Cliffs, NJ: Prentice-Hall.
- Skultans, V. (1975). *Madness and morals: Ideas on insanity in the nineteenth century*. London: Routledge & Kegan Paul.
- Smith, J. D. (1994). Reflections on mental retardation and eugenics, old and new: Mensa and the Human Genome Project. *Mental Retardation*, 32, 234–238.
- Specter, M. (1999, September 6). The dangerous philosopher. *New Yorker*, pp. 46–55.
- Stoddard, L. (1923). *The revolt against civilization: The menace of the under man*. New York: Oxford University Press.
- Stoddard, L. (1940). *Into the darkness: Nazi Germany today*. New York: Duell, Sloan & Pearce.
- Talbot, E. S. (1984). *Degeneracy: Its causes, signs, and results*. New York: Garland. (Original work published 1898)
- Trent, J. W. (1994). *Inventing the feeble mind: A history of mental retardation in the United States*. Berkeley: University of California Press.
- von Maltitz, H. (1973). *The evolution of Hitler's Germany*. New York: McGraw-Hill.
- Weir, R. F. (1984). *Selective nontreatment of handicapped newborns*. New York: Oxford University Press.
- Wolf, D. B. (2000). Social work and speciesism [Commentary]. *Social Work*, 45, 88–93.
- Wolfensberger, W. (1972). *Normalization*. Toronto: National Institute on Mental Retardation.
- Wolfensberger, W. (1992). *The new genocide of handicapped and afflicted people* (rev. ed.). Syracuse, NY: Author.
- Zak, S. (1991). Ethics and animals. In R. M. Baird & S. E. Rosenbaum (Eds.), *Animal experimentation: The moral issues* (pp. 24–34). Amherst, NY: Prometheus Books.

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