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Empathic Solidarity on the Frontline

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Jacqueline Bhabha's important article, *The Imperative of Sustaining (Rather Than Destroying) Frontline Empathic Solidarity for Distress Migrants*, highlights the pivotal role that "frontline communities" now play in international migration. Bhabha explores how frontline communities frequently lack the infrastructure, political will, and resources to respond adequately to "distress migrants."[1]   Yet, she unearths the potential of "empathic solidarity" to counteract bias and, more optimistically, provide a "welcoming and humanizing experience" to migrants.[2] Indeed, in this hopeful, ambitious article, Bhabha posits that empathic solidarity can play a significant generative role for migrants' rights.

One can easily find stories of how frontline communities engage with distress migrants around the world. In 2021, Belgrade, Serbia became the sudden home to over 5,000 distress migrants.[3] One such Afghan migrant, Mohammed Bilal, arrived in Belgrade after transiting through Pakistan, Iran, Turkey, Greece, and Macedonia, and found himself in a government-run facility with 55 other unaccompanied minors, struggling to survive.[4] As

[1]   *See* Jacqueline Bhabha, *The Imperative of Sustaining (Rather Than Destroying) Frontline Empathic Solidarity for Distress Migrants*, 40 B.U. INT'L L. J. 49, 50 (2022) [hereinafter Bhabha, *Empathic Solidarity*]. This Article uses Bhabha's term "distress migration" to refer to migration "that stems from desperation, vulnerability, and needs, from living circumstances that are experienced as unbearable or deeply unsatisfactory and that precipitate serious obstacles to a reasonable or tolerable life." JACQUELINE BHABHA, CAN WE SOLVE THE MIGRATION CRISIS? 65 (2018). As Bhabha observes, the term, distress migration, encompasses a broad range of noncitizens, beyond refugees or asylees, because it includes those who are compelled to leave their home countries for a broad array of reasons. *See id.*

[2]   *See* Bhabha, *Empathic Solidarity*, *supra* note 1, at 50.

[3]   *See* Dusan Komarcevic, '*Hang Them From Trees': Serbian Far-Right Group Targets Hostel Owner For Welcoming Migrants*, RADIO FREE EUROPE/RADIO LIBERTY (Oct. 14, 2021, 15:32 GMT), https://www.rferl.org/a/serbia-right-extremism-sombor-migrants/31509667.html.

[4]   Elisa Oddone, *Afghans Are Among Thousands Of Migrants Hoping To Reach Europe*

Milica Svabic, a Serbian lawyer, remarked, "Serbia is in a difficult position."[5] In a common narrative familiar to observers from the southern U.S. border to Australia and much of Western Europe, many Serbian residents feel that the influx of migrants has placed a significant strain on existing infrastructure and on a struggling economy.[6] These sentiments have fueled anti-immigrant sentiment. As Svabic put it, "On one side, [Serbia] needs to respect European Union requests if it aims to join the bloc, meaning keeping refugees here. But, at the same time, Serbia doesn't want them here."[7]

As Bhabha observes, frontline communities have assumed greater prominence as migration patterns shifted after World War II. So-called "First World" countries, notably the United States and many states within Europe, have increasingly hardened and outsourced[8] control of their borders.[9] As a result, distress migrants encounter more limited options for legal migration and face state-constructed (and sometimes privately run) barriers as they transit. Migrants must, therefore, often navigate fragmented, dangerous pathways en route to their final destination. Many remain in frontline communities for long periods of time, though in precarious legal and social statuses.[10] Without legal protection and basic necessities such as health care,

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Via Serbia, NAT'L PUB. RADIO (Sept. 26, 2021, 8:02 AM ET), https://www.npr.org/2021/09/26/1025135970/afghan-refugees-migrants-serbia-europe.

   [5] *Id.*

   [6] *See* Komarcevic, *supra* note 3.

   [7] Oddone, *supra* note 4 (alteration omitted).

   [8] By "outsourced," I refer to Cecilia Menjívar's definition, "the expansion of border controls beyond the physical border to the exterior, with the assistance of third countries, as well as toward the interior of the territory, through the strengthening of controls accompanied by the proliferation of expulsions and/or deportations." Cecelia Menjívar, *Immigration Law Beyond Borders: Externalizing and Internalizing Border Controls in an Era of Securitization*, 10 ANN. REV. L. & SOC. SCI. 353, 355 (2014).

   [9] Critical migration legal scholars have argued that First World countries intentionally crafted international migration law as a means to maintain economic dominance over Third World countries in the wake of colonialism. *See, e.g.*, E. Tendayi Achiume, *Migration as Decolonization*, 71 STAN. L. REV. 1509, 1518 (2019) ("Colonial-era imperial interconnection politically and economically subordinated Third World peoples for the purposes of shoring up the prosperous, collective self-determination of First World nations."); Chantal Thomas, *What Does the Emerging International Law of Migration Mean for Sovereignty?*, 14 MELB. J. INT'L L. 392, 440 (2013) (noting that migration "tends to reflect [the] economic and political connections crafted by the governments and investors of the global North").

   [10] *See, e.g.*, ALEKSANDRA CHMIELEWSKA ET AL., EUROPEAN COMM. OF THE REGIONS, TERRITORIAL IMPACT OF MIGRATION ON FRONTLINE REGIONS AND CITIES ON THE EU SHORES OF THE MEDITERRANEAN 11 (2021), https://data.europa.eu/doi/10.2863/627667 (describing the experiences of frontline communities like Thessaloniki, Greece, which has become "attractive to migrants because of its international humanitarian presence on the one hand, and connection to smugglers on the way to Bulgaria and North Macedonia, [and] sometimes becomes a more permanent place for the migrants").

distress migrants often find themselves vulnerable to smugglers, trafficking, and exploitation, and dependent on the good will of frontline communities for support.[11]

Frontline communities are also liminal spaces where rights claims can be particularly tenuous. These communities are generally plagued by state inaction, whether by design or by default. As Bhabha notes, "pervasive governance failure . . . unduly and willfully burdens these same host communities."[12] This breakdown often manifests in "over-crowded public facilities, displays of destitution and desperation, resentment and aggression intended for (and deserved by) distant policy makers but periodically meted out onto local populations."[13]

For these reasons and more, empathy and solidarity can be particularly difficult to cultivate.[14] In 1954, Gordon Allport found that intergroup contact was likely to *lessen* prejudice when four factors were present: (1) equivalent status; (2) similar goals; (3) collaboration; and (4) governmental support in the form of law, custom, or official conduct.[15] Frontline communities often lack these key features. Residents typically have (or think they have) distinct status from migrants, whether in the form of immigration or socio-economic status.[16] They often have dramatically different goals. Frontline communities

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[11]   *See* Roxane de Massol de Rebetz, *How Useful Is the Concept of Transit Migration in an Intra-Schengen Mobility Context? Diving Into the Migrant Smuggling and Human Trafficking Nexus in Search for Answers*, 27 EUR. J. ON CRIM. POL. & RSCH. 41, 49 (2021) (explaining how there is frequently a connection between "transit" migration and smuggling, trafficking, and exploitation).

[12]   Bhabha, *Empathic Solidarity*, *supra* note 1, at 59.

[13]   *Id.* at 60.

[14]   *See generally* GORDON W. ALLPORT, THE NATURE OF PREJUDICE (1954) (examining the nature of prejudice and exploring possible social and environmental factors that can reduce it). Since 1954, many researchers have engaged in empirical research that supports Allport's findings. *See, e.g.*, Hwa-Bao Chang, *Attitudes of Chinese Students in the United States*, 58 SOCIO. & SOC. RSCH. 66, 70-71 (1973) (examining the experiences of Chinese students in the United States and finding that contact with Americans "leads to a more favorable attitude towards the United States"); Elirea Bornman & Johan C. Mynhardt, *Social Identification and Intergroup Contact in South Africa With Specific Reference to the Work Situation*, 117 GENETIC SOC. & GEN. PSYCH. MONOGRAPHS 437, 440-44 (1991) (finding that personalization is a prerequisite for attitude change, including contact in the home); Brian Mullen, Rupert Brown & Colleen Smith, *Ingroup Bias as a Function of Salience, Relevance and Status: An Integration*, 22 EUR. J. SOC. PSYCH. 103, 105 (1992) (exploring the role of category salience, status, and value dimensions in shaping ingroup bias).

[15]   ALLPORT, *supra* note 14, at 281; Thomas F. Pettigrew, *Intergroup Contact Theory*, 49 ANN. REV. PSYCH. 65, 66-68 (1998).

[16]   *See, e.g.*, INDEPENDENT MONITORING, RAPID RESEARCH AND EVIDENCE FACILITY [IMREF], UNDERSTANDING RELATIONS BETWEEN LOCAL COMMUNITIES AND TRANSIT MIGRANTS IN GAO AND AGADEZ 26 (Feb. 8, 2021), https://reliefweb.int/sites/reliefweb.int/files/resources/IMREF_Understanding%20Communit

also typically lack formal governmental support or functioning asylum systems. Collaboration is especially difficult due to the lack of social contact and resources.[17] In some cases, physical and geographic barriers separate migrants from local residents, furthering divides. For example, in 2021, government officials in Tijuana erected chain-link fencing around a migrant camp, with the only means of exit and entry guarded around the clock by the Tijuana police.[18]

These conditions can foster bias and make it challenging to connect.[19] One recent study examined how 800 frontline communities across 18 European countries responded to distress migration.[20] It found that "exposure to transit migration increases prejudice and anti-foreigner sentiment."[21] The actual or perceived impermanence of migrant communities was also an obstacle. Roxane de Massol de Rebetz observed that in the EU "transit migrants" are "merely seen as individuals who are not there to settle," making it "easier to dehumanize them and increase the distance between 'us' and 'them' and/or passing the buck to other countries in terms of care and protection."[22] Amidst these conditions, it is unsurprising to see an empathy gap or deficit.[23]

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y-Migrant%20Relations%20in%20Gao%20and%20Agadez_Report.pdf (explaining how "mixed migration" involves those with "different legal statuses as well as a variety of vulnerabilities," in contrast to local community members).

   [17] *See, e.g.*, Joseph Guay, World Vision Int'l, Social Cohesion between Syrian Refugees and Urban Host Communities in Lebanon and Jordan 6, 9-13 (2020), https://reliefweb.int/sites/reliefweb.int/files/resources/World%20Vision%20International%20DM2020%20Social%20Cohesion%20Report.pdf (arguing that one of the primary drivers of social tension in Lebanon and Jordan between host and migrant communities is structural, "such as high levels of poverty, resource scarcity and lack of municipal capacity to deliver basic services").

   [18] *See* Elliot Spagat, *Migrant Camps Grow in Mexico Amid Uncertainty on US Policy*, ABC News (Nov. 19, 2021, 2:30 AM), https://abcnews.go.com/International/wireStory/migrant-camps-grow-mexico-amid-uncertainty-us-policy-81247591.

   [19] Nicolas Ajzenman, Cevat Giray Aksoy, Sergei Guriev, *Exposure to Transit Migration: Public Attitudes and Entrepreneurship*, Vox EU (June 5, 2020), https://voxeu.org/article/exposure-transit-migration-public-attitudes-and-entrepreneurship.

   [20] *Id.* (finding that transit migration "reduces trust in institutions, increases the aversion to risk, and decreases entrepreneurship among the native population").

   [21] *Id.*

   [22] Roxane de Massol de Rebetz, *supra* note 11, at 46.

   [23] The empathy gap has been defined as "an inability to recognize and respond to the feelings of others, especially others we perceive as different from us and, most perniciously, those whose race is different from our own." Jessica Sager, Opinion, *The Empathy Gap and How to Fill It*, Educ. Wk. (Oct. 4, 2016), https://www.edweek.org/leadership/opinion-the-empathy-gap-and-how-to-fill-it/2016/10; *see also* Judith Hall & Mark Leary, *The U.S. Has an Empathy Deficit*, Sci. Am. (Sept. 17, 2020), https://www.scientificamerican.com/article/the-us-has-an-empathy-deficit/ (arguing that "coronavirus pandemic, racial injustice, economic insecurity, political polarization, misinformation and general daily uncertainty" has given rise

It is for these reasons, Bhabha suggests, that empathic solidarity can play a pivotal role. She defines solidarity as "a politically driven engagement with an 'other.'"[24] This engagement can come in the form of "emotional, material, strategic or more broadly political" connection.[25] Bhabha envisions solidarity mediated by empathy or an "empathic" connection.[26] There is of course a rich scholarly literature—across many disciplines—interrogating various models of empathy and its limitations, which Bhabha readily acknowledges.[27] She further posits that, while imperfect, empathy is "not only possible but common and essential."[28]

Bhabha's insights are intriguing, and they prompt a welter of broad questions that one hopes Bhabha may address in future work. For example, how does "empathic solidarity" differ from such well-known related formulations as Biblical injunctions to care for the stranger or Kantian hospitality or the so-called "ethics of care?" How should we resolve the apparent dichotomy between empathy and the "rule of law?" Does empathic solidarity demand only dialogue and care? Or, does it imply hard, enforceable rights or standards, like what has evolved into the corpus of international refugee and human rights law?

Bhabha's model also raises more pragmatic concerns. What practical incentives can encourage empathic solidarity? Who should pay for these? (A single host nation state? Regional actors such as the EU? International entities? Private donors?) Is there a place for a multi-directional empathic solidarity that also promotes empathy *for* host communities? These questions provide rich areas for future empirical study and creative proposals.

Though many scholars have long considered how concepts akin to empathic solidarity intersect with migration, Bhabha adds new texture and depth. Kant, for example, defined "hospitality" simply as "the right of a

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to an empathy deficit).

[24]   Bhabha, *Empathic Solidarity*, *supra* note 1, at 53.

[25]   *Id.*

[26]   *Id.* at 51.

[27]   *See id.* at 55, 63. Self-focused perspective-taking can be challenging given inherent power imbalances resulting from colonialism. *See, e.g.*, Normal George Dale, Decolonizing the Empathic Settler Mind: An Autoethnographic Inquiry 111 (2014) (Ph.D. dissertation, Antioch University) (ProQuest) ("Kipling was torn—as I am—with inclinations born of irrepressible empathy for the colonized, but heavily mixed with ingrained, White privilege and arrogance."). Moreover, researchers have found that displaying empathy can prompt empathic distress or personal discomfort that can disincentivize the exercise of empathy. *See, e.g.*, Sarah Fabi et al., *Empathic Concern and Personal Distress Depend on Situational but Not Dispositional Factors*, 14 PLoS ONE 11, 15 (2019), https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0225102 (examining the "variables that influence the situational empathic responses").

[28]   *See* Bhabha, *Empathic Solidarity*, *supra* note 1, at 63.

stranger not to be treated as an enemy when he arrives in the land of another,"[29] clearly a rather limited admonition. Kant was primarily concerned with a "right of temporary sojourn, a right to associate, which all people have," and he famously declined to extend such a right to permanent visitors.[30] More recently, Jacques Derrida, drawing on the work of Levinas, presented a limited but richer and more challenging account of hospitality.[31] Instead of eliminating the distinction between the host and the "other," Derrida posited that hospitality implies and preserves distance between the resident and the "stranger."[32] Thus, Derrida posits that there is a difference between a "conditional hospitality" that allows the resident to invite the "stranger" into their home, and an absolute hospitality that dictates that the resident "give place to them" without any reciprocity.[33]

Seyla Benhabib, in ways that prefigure Bhabha's approach, applied and elaborated upon Kant's concept of hospitality within the modern context of migration.[34] Benhabib argues that hospitality should be more robust and connected to a cosmopolitan framework of human rights.[35] Benhabib reads Kant's doctrine of universal hospitality "as opening up a space of discourse, a space of articulation, for 'all human rights claims which are crossborder in scope.'"[36] She suggests that these principles should reach beyond the single visit and apply, in some cases, to long-term stays.[37]

Bhabha rests upon this framework as she sketches out the role of empathic solidarity in frontline communities. She envisions a form of hospitality that

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[29]   IMMANUEL KANT, PERPETUAL PEACE: A PHILOSOPHICAL SKETCH 20 (Lewis W. Beck ed. & trans., The Bobbs-Merrill Co. 1957) (1795).

[30]   *Id.*

[31]   *See, e.g.*, JACQUES DERRIDA & ANNE DUFOURMANTELLE, OF HOSPITALITY 25-29 (Rachel Bowlby trans., Stanford University Press 2000) (1997) (exploring the nature of hospitality extended to the stranger); *see also* Jacques Derrida, *Hostipitality*, 5 ANGELAKI 3, 9 (2000); *Hospitality, Justice and Responsibility: A Dialogue with Jacques Derrida*, *in* QUESTIONING ETHICS: CONTEMPORARY DEBATES IN PHILOSOPHY 65, 68 (Mark Dooley & Richard Kearney eds., 1998); DECONSTRUCTION IN A NUTSHELL: A CONVERSATION WITH JACQUES DERRIDA 110 (John D. Caputo ed., 1997).

[32]   *See* DERRIDA & DUFOURMANTELLE, *supra* note 31, at 25-29 (translating "stranger" from Greek *xenos*).

[33]   *Id.* at 25.

[34]   *See generally* SEYLA BENHABIB, ANOTHER COSMOPOLITANISM 147-77 (Robert Post ed., 2006) [hereinafter BENHABIB, ANOTHER COSMOPOLITANISM]; SEYLA BENHABIB, THE RIGHTS OF OTHERS: ALIENS, RESIDENTS AND CITIZENS 25-48 (2004) [hereinafter BENHABIB, THE RIGHTS OF OTHERS].

[35]   *See* BENHABIB, ANOTHER COSMOPOLITANISM, *supra* note 34, at 148.

[36]   *Id.* (citation omitted).

[37]   *See, e.g.*, BENHABIB, THE RIGHTS OF OTHERS, *supra* note 34, at 38 (critiquing the "unbridgeable gap [Kant] suggests exists between the right of temporary sojourn and permanent residency").

extends to all "distress migrants," regardless of their intended length of stay, and a deeper form of connection, that goes far beyond Kant's notion of hospitality.[38] She does not speak of distance; she speaks of closeness. She also issues a call to other disciplines, beyond philosophy, for practical lessons on how cultivate empathic solidarity.

Bhabha recognizes that research across fields has shown that empathy, rather than a static trait, is akin to a competency, developed with training and practice.[39] In the public health field, studies have illustrated how empathy can decline after professional training, resulting in worse health outcomes and reduced trust between patients and professionals.[40] In contrast, training to boost empathy has shown promise.[41] Researcher Daryl Cameron has found that empathy can be boosted by changing how individuals think about the concept.[42] In one study, Cameron convinced participants that empathy would be emotionally rewarding instead of exhausting, and this change of mindset made participants more likely to be empathetic.[43] In another study, participants showed greater empathy for mass suffering when they were convinced that it would not cost them financially.[44] Thus, lessening the perceived costs of empathy may encourage its exercise.[45]

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[38] Bhabha, *Empathic Solidarity*, *supra* note 1, at 50.

[39] *See, e.g.*, Cendri A. Hutcherson et al., *Empathy Is Hard Work: People Choose to Avoid Empathy Because of Its Cognitive Costs*, 148 J. OF EXPERIMENTAL PSYCH.: GEN. 962, 970 (2019) (exploring the costs of empathy but showing that experimentally increasing empathy efficacy can counteract these effects); Karina Schumann et al., *Addressing the Empathy Deficit: Beliefs About the Malleability of Empathy Predict Effortful Responses When Empathy Is Challenging*, 107 J. OF PERSONALITY & SOC. PSYCH. 475, 488-89 (2014) (finding that individuals can develop empathy when they believe empathy develops with effort).

[40] *See* Paula Nunes et al., *A Study of Empathy Decline in Students From Five Health Disciplines During Their First Year of Training*, 2 INT'L. J. MED. EDUC. 12, 15-16 (2011) (finding decreased empathy scores among students enrolled in schools of dentistry, pharmacy, medicine, veterinary medicine, and nursing after first year training); Mohammadreza Hojat et al., *The Devil Is in the Third Year: A Longitudinal Study of Empathy Erosion in Medical School*, 84 ACAD. MED. 1182, 1186 (2009) (finding a significant diminution in empathy scores among medical students in the third year).

[41] *See, e.g.*, Helen Reiss et al., *Improving Empathy and Relational Skills in Otolaryngology Residents: A Pilot Study*, 144 OTOLARYNGOLOGY-HEAD & NECK SURGERY 120, 121 (2011) (exploring how empathy training sessions can improve self-reported ability to engage in empathy).

[42] Katie Bohn, *The Empathy Option: Digging Into the Science of How and Why We Choose to Be Empathetic*, RSCH./PENN STATE, Fall 2019, at 21, 21 ("If our goal is to inspire more empathy to bridge social divides, then maybe knowing how and why people sometimes choose to *not* feel it could suggest a lever for pushing people in the opposite direction — to choose empathy." (quoting Daryl Cameron)).

[43] *Id.* at 22.

[44] *Id.*

[45] *See id.*

This social science research poses a number of questions for Professor Bhabha's project. If empathy is a choice and its cultivation a challenge, how can frontline communities and activists realistically encourage and cultivate it? The international community has begun promising research on practices to increase connection among host communities and migrants.[46] The Organization for Economic Co-operation and Development (OECD) released a report in 2020, entitled *Local Inclusion of Migrants and Refugees*, recognizing the pivotal role of local communities, especially mayors and urban centers, in responding to distress migration.[47] The report calls for greater inclusion of migrants in urban planning and local governance.[48] It also encourages greater collaboration among migrant and host communities, including the involvement of migrants in city-planning initiatives and local economic development.[49] These recommendations can be instructive for efforts to promote empathetic solidarity.

Bhabha's recommendations also raise the question of whether empathic solidarity is unidirectional, bestowed from the host community member to the migrant, or whether it is multi-directional. Does her call include a desire for empathic solidarity from the broader political and social community *towards* frontline communities? Frontline communities, as Bhabha observes, suffer from profound state inaction, lack of economic resources, and declining economic development.[50] These factors affect migrant and host communities alike. Indeed, as some host community members themselves struggle to survive, their economic challenges can be significant barriers to solidarity and connection. These forces often fuel anti-immigrant bias and hate. Thus, they force us to consider whether host community members themselves are deserving of empathic solidarity themselves? If so, could interventions—in the form of injections of resources, infrastructure, and political will—positively impact the ability of host communities to engage and support distress migrants in their midst? Can a more robust, multi-directional empathic solidarity spark meaningful long-term conversation, connection, and change?

Finally, Bhabha asks us to consider possible risks of a humanitarian response premised on empathic engagement.[51] Scholars have observed that empathy can be an imperfect tool to compel action because it can fuel bias. Yale Psychology Professor Paul Bloom argued that empathy is "a poor moral

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[46]   *See, e.g.*, GUAY, *supra* note 17, at 4 ("[S]ocial cohesion is a critical yet under-researched and under-developed area of humanitarian and development programming.").

[47]   *See* OECD, LOCAL INCLUSION OF MIGRANTS AND REFUGEES *passim* (2020), https://www.oecd.org/regional/Local-inclusion-Migrants-and-Refugees.pdf.

[48]   *Id.* at 16-17.

[49]   *Id.*

[50]   Bhabha, *Empathic Solidarity*, *supra* note 1, at 59-60.

[51]   *Id.* at 51.

guide."[52] He asserts that the problems with empathy are "innumerate."[53] Bloom observes, "It can spark violence; our empathy for those close to us is a powerful force for war and atrocity towards others. It is corrosive in personal relationships; it exhausts the spirit and can diminish the force of kindness and love."[54] He also argues that we are hardwired to prefer the person we know over the stranger, and this preference can drive bias.[55]

Bhabha readily acknowledges that empathy is an imperfect concept, but unlike Bloom, she also sees it as a potential catalyst of change. Empathetic solidarity cannot remedy all the governmental failures in frontline. For meaningful reform, much is needed, including resources, political will, and a functioning legal framework, among other factors. However, empathetic solidarity can fortify and sustain these efforts. By doing so, it has the potential to strengthen the rights of distress migrants in their midst.

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[52]   Paul Bloom, Opinion, *Think Empathy Makes the World a Better Place? Think Again . . .*, THE GUARDIAN (Feb. 18, 2017), https://www.theguardian.com/commentisfree/20 17/feb/19/think-empathy-makes-world-better-place-think-again.

[53]   *Id.*

[54]   PAUL BLOOM, AGAINST EMPATHY: THE CASE FOR RATIONAL COMPASSION 9 (2016).

[55]   *See* Bloom, *supra* note 52. This observation has been echoed by other research. *See* Scott Slovic & Paul Slovic, Opinion, *The Arithmetic of Compassion*, N.Y. TIMES (Dec. 4, 2015), https://www.nytimes.com/2015/12/06/opinion/the-arithmetic-of-compassion.html; *see also* Paul Slovic et al., *Compassion Fade: Affect and Charity Are Greatest for a Single Child in Need*, PLoS ONE 9(6) *passim* (2014), https://journals.plos.org /plosone/article/file?id=10.1371/journal.pone.0100115&type=printable. Some, like Bloom, warn that an overreliance on empathy can lead not only to misdirected action but also to a form of compassion fatigue that can cause apathy. *Id.*