Safeguarding the Epistemic Agency of Intellectually Disabled Learners

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Young people labelled as significantly intellectually disabled are often denied full inclusion in classrooms, because they are positioned as diminished knowers.[1] Stereotypes of epistemic incompetence play an important role in this positioning.[2] More curiously, the epistemic exclusion of intellectually disabled students also persists in nominally inclusive educational contexts where ableist stereotypes are challenged. For example, within educational philosophy and philosophy of disability, social and educational inclusion is frequently promoted on political or moral grounds.[3] Some forms of formal inclusion are even framed as morally compulsory because students labelled with significant intellectual disabilities are worthy of respect, even though they supposedly lack the rational capacities that are normally regarded as grounds for mutual respect. Similarly, political inclusion is justified because interaction between cognitively diverse students is viewed as a means of expanding the surplus of "civic capital" necessary for social justice. However, such arguments are compatible with perceptions of intellectually disabled students—and particularly students understood as "profoundly" intellectually disabled—as epistemically less capable, and even *in*capable, and therefore as permissibly excluded from the regular epistemic projects of education. Indeed, such arguments often betray a commonly held assumption that intellectually disabled students should be expected to learn and contribute little if any knowledge through

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participation in ostensibly inclusive settings, instead serving as mere means of developing enhanced capacities of empathy for nondisabled peers. In short, the *epistemic exclusion* of intellectually disabled students may be regarded as the natural consequence of their disability, thus rendering their *epistemic inclusion* ethically non-compulsory.

In this essay, we argue that the epistemic exclusion of intellectually disabled students is educationally and ethically misguided. First, we identify a type of epistemic regard owed to all children as a normative condition of education—namely, the presumption of their epistemic potential. Second, we introduce the notion of "epistemic transparency" in order to explain that educators' tendency to attribute diminished epistemic potential to intellectually disabled students—a widely documented pattern—is unfounded, and thus violates the ethical requirement to presume students' epistemic competence.[4] We argue that the asymmetrical application of this principle constitutes a serious problem of educational justice because it is grounded in an ethically arbitrary double standard, which also underwrites harmful and discriminatory educational practices and institutions. Moreover, in order to focus on the problem of epistemic transparency as a problem that persists even within efforts to elevate the epistemic contributions of intellectually disabled people, we examine philosopher Eva Kittay's recent book *Learning from My Daughter*—a significant contribution to inclusive theorizing about intellectual disability. Finally, we propose the presumption of students' epistemic agency as an ethical principle whose primary purpose is to rectify the problem of epistemic exclusion and to promote the epistemic inclusion of intellectually disabled students.

As scholars who identify as able-minded and who have close personal and professional relationships with people labelled with

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intellectual disabilities, we come to this project with both the limited perspective of able-minded experience and the critical lens of philosophically informed advocacy. For Ashley, the experience of teaching intellectually disabled learners has been both epistemically transformational and ethically challenging. Nevertheless, when she is faced with her limitations as a teacher to work beyond communication barriers, or to understand and evaluate the contributions of intellectually disabled learners, Ashley has confronted the uncritical assumption of diminished epistemic competence that persists as a specifically ableist presumption more broadly. For Kevin, his experience as a parent of an autistic child with intellectual disability labels raises similar challenges. Like many parents of children labelled as intellectually disabled, internalized social pressures to "ratchet down" expectations about his child's cognitive capabilities are often exposed in exceptional circumstances where opportunities for his child to demonstrate intellectual abilities unexpectedly expands the perimeter of possibility. Our respective experiences converge on the conclusion that much work remains to be done in providing able-minded adults in positions of educational and developmental authority with more finely tuned conceptual resources for circumventing default orientations that lead to epistemic exclusion. This essay contributes such conceptual resources.

EPISTEMIC OPACITY

For students considered to be able-minded—that is, considered to be intellectually and developmentally typical—the idea that we should presume a high degree of epistemic potential is relatively uncontroversial, if frequently undermined within existing educational contexts.[5] As an ethical orientation towards developing knowers, teachers should proceed on the basis of the assumption that students are *epistemically opaque* to them insofar as the limits of their potential as

knowers is unknown. Good teachers presume that specific evidence of students' learning in the present indicates epistemic capabilities that have the potential to develop into more sophisticated and complex abilities—or "intellectual virtues"—even when they cannot be certain that they will. Despite the pervasiveness of such inferences, any specific instance of learning does not actually provide comprehensive evidence in support of a pedagogical judgment about favorable or unfavorable developmental trajectory. Indeed, teachers are often left only to hope that the seeds they have planted will take route and continue to grow. Of course, and for any number of reasons, a particular student's experienced epistemic competence may be less than or exceed, perhaps dramatically, any suggestion of what their capabilities at a given moment can be reasonably taken to imply. It is baked into the very definition of teaching that we presume such epistemic potential; otherwise, our work would be at best absurd and at worst cruel.

At first glance, this argument may seem like a straightforwardly empirical matter whose legitimacy turns solely on the adequacy of empirical judgments about evidence concerning students' cognitive ability or lack thereof. In practice, however, the presumption of epistemic potential in educational contexts actually flies in the face of available evidence at least to some extent. Evidence for future capability or present potential necessarily relies somewhat on speculative, and generous, projections about students' future development and growth. As such, the presumption of epistemic competence reflects both an empirical judgment about their capabilities and a *normative* commitment on the part of educators. Students are owed such a presumption because otherwise educational impositions cannot be adequately justified.

Nevertheless, some students are regularly denied the presumption of epistemic opacity. Specifically, intellectually disabled students

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are frequently treated as if the label itself provides definitive information about their epistemic potential, and/or they are placed in educational contexts that fail to provide opportunities to develop epistemic competence. While learning disabled students are increasingly understood through much less reductive frames, they still face persistent educational denial, including low expectations and lack of access to stimulating learning materials. Students labelled with intellectual disabilities experience even greater opportunity costs. In particular, they are less likely to be placed in general education classrooms, and, when they are, they typically spend a great deal of time being taught basic skills that are deemed necessary for proper socialization, rather than for participation in broader epistemic communities, including higher education. As we discuss in the next section, intellectually disabled learners are epistemically excluded in education because the presumption of epistemic opacity that provides the normative impetus for education is deferred or withheld for students with intellectual disabilities. Instead of being regarded as epistemically opaque, which entails the attribution of epistemic potential and agency, these students are apt to be viewed as epistemically *transparent*.

THE EPISTEMIC TRANSPERENCY PROBLEM

Identified as a normative condition of education, the presumption of epistemic competence highlights an important and overlooked problem of educational justice for intellectually disabled students: the obligation to treat students as if they have epistemic potential. Injustice occurs when educators arbitrarily withhold this presumption from intellectually disabled students. In contrast to able-minded peers, intellectually disabled students are frequently regarded as epistemically *transparent*, a move which appears to release teachers from their obligation to treat students as if they are epistemic agents. Intellectual dis-

ability is taken to imply epistemic incompetence, providing educators with what they regard as sufficient reason to withhold application of the presumption of epistemic competence. In this section, we identify two problems with this asymmetrical application of the epistemic competence principle.

First, the presumption of epistemic transparency rationalizes, rather than justifies, the exclusion of intellectually disabled students from school-based knowledge production practices. The tendency to substitute presumptions of epistemic transparency for those of epistemic opacity in the case of intellectually disabled students is not grounded in an appeal to ethical principle. Rather, the presumption is a manifestation of harmful stereotypes about intellectual disability, which encourage unwarranted inferences about global intellectual competence from more specific cognitive limitations. More generally, the failure to "presume competence" about students' epistemic potential is structured and reinforced by the intersection of "cognitive ableism" and epistemic exclusion within educational institutions.[6] Cognitive ableism works to obscure a labelled person's epistemic potential at a given moment and to downgrade assessments about students' epistemic potential—that is, the view that they will, if given the proper support, experience epistemic agency in the future. Carlson defines cognitive ableism as "a prejudice or attitude of bias in favor of the interests of individuals who possess certain cognitive abilities (or the potential for them) against those who are believed not to actually or potentially possess them."[7] As such, this form of unequal treatment lacks moral justification.

Second, as noted in the introduction, epistemic exclusion also occurs in spaces of formal inclusion—that is, mainstreaming—and can be perpetuated by advocates of intellectually disabled students and

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their learning. Even in such comparatively favorable contexts, intellectually disabled students nevertheless encounter the presumption of epistemic transparency. In these cases, epistemic exclusion requires explanations that go beyond cognitive ableism.

In order to explore how assumptions of epistemic transparency creep into more critical perspectives, we turn to a recent book by Eva Feder Kittay—a moral philosopher whose well-known engagement with theoretical questions of intellectual disability are explored through her relationship with her intellectually disabled daughter, Sesha. In *Learning from My Daughter*, Kittay argues for revisioning core philosophical insights in light of the lived experiences of intellectually disabled people.[8] Central to Kittay's ethical conception of CARE[9] is the requirement to recognize "genuine needs and legitimate wants"[10] of intellectual disabled persons. As such, Kittay insists that treating intellectually disabled people with respect and care requires a commitment to honor their subjective individuality. It remains unclear, however, what resources Kittay's account of respect provides to uphold the *epistemic* individuality of intellectually disabled people. Kittay eloquently portrays Sesha in ways that vividly illustrate Sesha's distinctive, individual desires and preferences for music and physical touch. However, at other times, when emphasizing Sesha's communicative limitations, Kittay portrays herself as unable to "know" what Sesha "really" wants.

It also remains unclear from Kittay's account to what extent, and on what basis, the wants and needs of intellectually disabled people can be justifiably attributed to an individual other whose standpoint with respect to her own needs and wants remains epistemically separable from the needs and wants of those who care for her. In raising this question, we acknowledge that Kittay's overarching ethical theory is deeply relational. As such, Kittay believes intellectually

disabled people are owed respect for reasons arising from relationships of dependency to and with caregivers. Kittay also insists they are owed respect as persons whose intrinsic value is distinguishable from these relations. While we accept that epistemic agency is relational, and that it may be very difficult to distinguish the boundaries of the subjective separateness of intellectually disabled people who do not communicate through verbal, signed, or typed language, we also emphasize that thoroughly relational ethical theories are uncongenial—historically and conceptually—to people labelled with intellectual disabilities. Historically, "caring relations" have dictated that intellectually disabled people are treated as passive recipients of care, and as epistemic non-agents—a status that seems to justify their treatment as non-knowers. While giving a forceful argument for ethical respect, Kittay's account does not provide clarity on why ethical respect includes epistemic respect.

Kittay frequently refers to Sesha and others with similar intellectual disabilities in terms that are notably ambiguous between the categories of epistemic opacity and epistemic transparency. It is not altogether clear whether the existing absence of the communicability of desires, preferences, and wants implies that those with intellectual disabilities should be regarded as agents with epistemic potential, or as individuals whose wants and needs are necessarily determined by caring others. On the one hand, Kittay's overall ethical conception, which is specifically designed to include intellectual disability as a conceptually transformative and corrective influence, aligns itself with a view of intellectually disabled people as agents whose epistemic opacity portends educational potential. On the other hand, considering that ethical theories exist within highly non-ideal and at least somewhat unjust political and social contexts, Kittay's ethical account seems to leave unanswered important questions about how educators might

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go about enacting educationally progressive attributions of epistemic agency, rather than simply projecting their own able-minded assumptions for the "legitimate wants and needs" of their students. For example, she writes, "The attentive responsiveness critical to successful caring is made possible—often, at least—by an empathetic connection to and understanding of the other. These enable us to 'read' the mind of another, especially in cases where the other is either temporarily or permanently incapable of communicating through speech. As such, affective connections are a needed moral epistemic resource."[11] While emphasizing the importance of both physical and epistemic intimacy in the caring relation, this passage reveals a tension between what it means to "read" the mind of the other and under what conditions such epistemic projection is regarded as necessary, and therefore permissible.

These questions aside, Kittay makes the case that intellectually disabled people, and Sesha in particular, have a great deal that is of importance to teach the rest of us if we are only willing and open enough to learn from them. Sesha is positioned as a teacher whose lessons arise from and illustrate her subjective separateness: "The first chapter of part II has been a lesson on dependency. It is what I have learned from my daughter . . . It is Sesha's lesson."[12] Troublingly, the un-foreclosed possibility that in certain cases epistemic competence is unknowable and therefore potentially absent, renders it unclear in what sense people labelled with intellectual disabilities are to be understood as active contributors to knowledge making. To illustrate, consider the following (problematic) possibility: people often metaphorically attribute educational properties to inanimate objects, even going so far as to say that things (a mountain, a forest, an ocean) *teach* us. In such cases, the educational and epistemic dimensions of the 'relationship' turn on the agency of a (non-disabled) epistemic agent. The

"epistemic perspective" of the ocean or mountain remains obscure. In cases like this, the student and teacher are essentially equivalent, and the educational process is most easily understood as a process of self-education, rather than as an educational relation between separate individuals. Kittay would, rightly, balk at construing Sesha's epistemic contributions in these terms. Nevertheless, her portrayal of Sesha's teaching role is frustratingly circumspect about how we should understand Sesha as an epistemic agent.

Because we are broadly sympathetic with Kittay's account, we are inclined to explore a possible extension of her view that caring (educational) relations involve *epistemic* respect for the legitimate wants and needs of intellectually disabled people. Kittay, along with Licia Carlson, another philosopher of cognitive disability, has positioned intellectually disabled people as transformative to philosophy—indeed, as challenging its core assumptions. As Kittay states passionately, "My daughter gave the lie to most of my professed philosophical beliefs."[13] As Sesha is clearly not a passive object—Kittay describes her discerning love of music, her responsiveness to close friends, her laughter—we are best to interpret her as having a more than simply object role whose epistemic contributions are non-derivative or separate from the interpretations of others. In fact, within the context of Kittay's family, Sesha is an epistemic participant in the sense that Dohmen, following Hookway, describes it: "According to the participant perspective, the relevant questions about epistemic competence concern one's ability to be involved in the activities that contribute to the growth and sharing of knowledge."[14] As an epistemic participant, Sesha can be seen as competent in a broad sense, and not only in the extent to which she provides specific kinds of information.[15] The distinction between an "informative perspective" and a "participant perspective" describes the difference between being a reliable source of information, on the

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one hand, and being a participant on the other hand.[16] We suggest that in numerous passages like the one above in Kittay's book, Sesha's epistemic contribution lies somewhere in between, as she is taken as both a reliable informant—"she gave lie to most of my professed philosophical beliefs"—and as a participant whose ability to contribute such information is heavily mediated by relationships.[17] Still, it remains unclear the extent to which it is Sesha's epistemic separateness—her status as a knower—rather than simply Kittay's interpretation of her being, that provides this information.

A charitable reading of Kittay's account of "learning from my daughter" would seem to require us to take seriously a potential middle-ground between a non-participant object understanding of teacher and the view of the teacher as able-minded author—which is to say, an understanding of the teacher as a subjectively separate epistemic agent. Perhaps, then, epistemic agency is best understood on a spectrum wherein one's ability to participate in epistemic projects may be heavily structured by caregiving—or teaching—practices but where one's separateness is nonetheless assured. While among the many attributes of a teacher, the extent to which they are understood as reliable sources of information is certainly at the top—such estimations of reliability take place within and according to able-minded norms. Metrics of epistemic reliability are premised on the assumption that a person is epistemically non-transparent. And, because epistemic transparency is frequently ascribed in the absence of verbal, typed, or signed communication (and is sometimes assumed even if such things are present), this epistemic context makes it very difficult to regard intellectually disabled people as epistemic participants even in the minimal sense.

Finally, it is perhaps important to note that caregiving contexts and educational contexts frequently overlap, particularly when intellec-

tually disabled people also experience physical or health disabilities that result in their needing physical care while at school. However, there are notable differences between the relationship that a teacher has to her students and the relationship a caregiver has to a person in his care. While both teachers and caregiver may be responsible for making quick decisions that safeguard the physical well-being of a person, teachers' obligations to students go beyond safeguarding physical and mental health (although they certainly include these things). As we outlined above, the teacher's obligation to her students is also to safeguard their epistemic potential by treating students as subjectively separate and epistemically opaque in the sense that their epistemic horizons are not fully known. In fact, as we argued above, the encounter with an epistemically opaque other demands that we presume potential epistemic competence and avoid acting as if any information we have of their epistemic competence now determines their later epistemic competence. In sum, the asymmetrical application of the principle of presumption of epistemic competence implies a harmful and unjust arbitrary double standard—one that jeopardizes the epistemic potential of intellectually disabled students.

PRESUMING EPISTEMIC AGENCY

The fact that a double standard persists makes clear that identity-based discrimination is at play and reveals the unjustifiability of proceeding as if that student can be treated as epistemically transparent. Recognizing differences in students' intellectual and social needs and developmental pace does not, therefore, entail changing one's ethical orientation towards epistemic competence and growth. Indeed, a "spectrum" view of achieved epistemic agency enables recognition of differences in the character and form of epistemic competence, but it does not thereby entail the absence of epistemic competence.

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Precisely because of educators' uncertainty about students' full epistemic potential, they are ethically obliged to proceed *as if* their students are both presently epistemically capable and possess the potential for epistemic growth.

In their influential essay "Presuming Competence," Douglas Biklen and Jamie Burke argue that when a teacher is confronted with a student who uses limited or no speech and possesses at the time of the encounter no recognized form of communication, the situation "demands a kind of compact between teacher and student to choose the most optimistic stance possible," namely "presuming competence."[18] Biklen and Burke's principle of presuming competence articulates an ethical orientation that teachers must adopt as part of their professional and ethical responsibilities to *all* students. We suggest that the purpose of this principle should be construed more broadly as a presumption of epistemic agency. Our "presumption of epistemic agency" principle emphasizes the preservation of the epistemic opacity of students labelled with intellectual disabilities, so as to promote a baseline for comprehensive (moral and epistemic) inclusion. It is our contention that doing so requires not only a reformation of teachers' psychological and professional commitments (for example, epistemic humility or awareness of bias) but also a deep cultural transformation.

Like the presuming competence principle, the presumption of the epistemic agency principle is a distinctively *educational* ethical principle; both principles are grounded in the distinctive context of educators' obligations towards their students in virtue of the need to treat epistemic opacity as a normative condition of the educator-student relationship. Indeed, the intuitive case for these principles is supported by an argument from the ethical obligation to minimize harm. In contexts of uncertainty, the presumption of epistemic agency is the least

harmful alternative—what Anne M. Donnellan long ago called "the criterion of the least dangerous assumption"—available in educational contexts.[19]

However, suspending judgment about a students' epistemic potential in recognition of the reality of epistemic opacity is a necessary but insufficient condition for presuming epistemic agency. Consider how an emphasis on epistemic humility in professional encounters with intellectually disabled people emphasizes that professionals regard themselves as fallible or potentially wrong in their interpretation of a student. But the problem of treating people labelled with intellectual disabilities as if they are epistemically transparent is not (only) a problem of a teacher's failure to recognize their fallibility or to exercise good intentions; rather, it is a function of a larger problem of the interpretive context of able-minded supremacy that shapes educational encounters in general. Thus, while our argument is certainly not intended to take non-ideal, unjust contexts for granted, we recognize that educators' current decision-making takes place within contexts of entrenched ableism that shape their educational decision-making. However, the presumption of epistemic agency principle applies beyond *teacher* decisions and to assessments of the background conditions against which such decisions are made. Thus, questions of how this principle plays out in practice require first addressing how the principle applies to *both* the wider background conditions of schooling *and* to the decisions teachers make within schools.[20]

The presumption of the epistemic agency principle relies on the insight that interpretations of epistemic agency are culturally mediated. This insight can be illustrated by adapting concepts from liberal multicultural theory. Will Kymlicka has noted that a culture can be understood in at least two distinct senses.[21] First, there is the view

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of culture as a "structure": cultural formations include certain norms, and education is a process of internalizing those norms. However, this understanding of culture fails to capture the ways in which cultural education enables individuals to critically assess, and, if necessary, modify cultural norms and expectations. The broadly educational process of enabling individuals to participate in culturally embedded practices of norm revision reflects Kymlicka's second sense of culture: culture as a "context of choice." The distinction between cultural structure and culture as a context of choice has a clear application to the case of intellectual disability. Most societies consist of cultural structures that strongly enforce norms of able-mindedness, and these norms inscribe horizons of possibility for epistemic agency. Importantly, cultural resources for imagining and perceiving the epistemic agency of individuals labelled with intellectual disability are likely to lie beyond the visible horizons of ableist cultures. To the extent that educators rely on existing and prevailing cultural narratives and patterns for their interactions with intellectually disabled students, they are condemned to reiterate patterns of epistemic incompetence in and for their students. Failures to recognize epistemic agency in people labelled with intellectual disabilities occur in part because educators who wish to challenge ableist logics of epistemic exclusion lack adequate interpretive frames for stimulating and perceiving expressions of epistemic agency. Inclusive research practice is still rare and cultural representations of intellectual disability are rarely derived from the first-person epistemic perspective of "disabled narratives."[22] Rather, culturally valued meanings are shaped by able-minded ways of interpreting the world. Even when intellectual disability is culturally represented, it is often portrayed through a lens distorted by able-minded normalcy. Thus, the pedagogical task of applying the principle of presumption of epistemic agency is a complex task of cultural interpretation and

critique. This challenge underscores why and how it is so important that educators who wish to uphold a principle of the presumption of epistemic agency seek out cultural counternarratives that portray and illustrate atypical—verbal and non-verbal—expressions of epistemic agency. Whether educators' particular decisions bear out the ethical orientation of presuming epistemic agency will necessarily need to be considered within context. Moreover, our emphasis on background conditions underscores the importance of not over-emphasizing the responsibility that teachers (in particular) can rightly be said to have for reproducing cognitively ableist educational projects, especially within ableist social structures.

A principle of presumption of epistemic agency goes beyond harm reduction and a posture of expecting learning potential, by emphasizing the more fundamental problem of epistemic exclusion and highlighting epistemic inclusion as a distinctive ethical imperative. This ethical principle includes both an individual ethical obligation to honor students' epistemic potential and the commitment to more expansive democratic and epistemic projects of educational inclusion. The epistemic exclusion of intellectually disabled people impoverishes knowledge frames, and the antidote to this impoverishment is epistemic inclusion via the presumption that labelled people are knowers.

CONCLUSION

We have argued that even sympathetic philosophical and educational accounts of intellectual disability lack clarity over how to define the epistemic agency of intellectually disabled people, and how to facilitate labelled people's participation in epistemic projects as knowers. In response, this essay offers some conceptual resources for educators committed to the comprehensive—moral *and* epistemic—inclusion of intellectually disabled students. It is our hope that

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such conceptual resources propel continued—and expanded—work in promoting educational justice for students labelled with intellectual disabilities.

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1 Intellectual disability is a medical/psychological term used to describe a person who is regarded as having significant limitations in both intellectual functioning and adaptive behavior. Following critical scholarship in disability studies and disability studies in education, we use the terminology "labelled with an intellectual disability" or "intellectually disabled" to emphasize the socially embedded and defined nature of the label of intellectual disability. While our discussion here may be relevant to the epistemic inclusion of students labelled with other forms of cognitive disability or who are regarded as neuro-atypical, our focus is on students who are labelled as intellectually disabled.

2 Licia Carlson, *The Faces of Intellectual Disability: Philosophical Reflections* (Bloomington, IN: Indiana University Press, 2009); Christopher Kliewer, Douglas Biklen, and Amy Petersen, "At the End of Intellectual Disability," *Harvard Educational Review* 85, no. 1 (2015): 1-28.

3 Sigal Ben-Porath, "Defending Rights in (Special) Education," *Educational Theory* 62, no. 1 (2012): 25-39; Carlson, *The Faces of Intellectual Disability.*

4 Christine Ashby, "The Trouble with Normal: The Struggle for Meaningful Access for Middle School Students with Developmental Disability Labels," *Disability & Society* 25, no. 3 (2010): 345-358; Douglas Biklen, and Jamie Burke, "Presuming Competence," *Equity & Excellence in Education* 39, no. 2 (2006): 166-175; Amy Petersen, "Shana's Story: The Struggles, Quandaries, and Pitfalls Surrounding Self-Determination," *Disability Studies Quarterly* 29, no. 2 (2009).

5 Biklen and Burke, "Presuming Competence."

6 Biklen and Burke.

7 Licia Carlson, "Cognitive Ableism and Disability Studies: Feminist Reflections on the History of Mental Retardation," *Hypatia* 16, no. 4 (2001): 140.

8 Eva Feder Kittay, *Learning from My Daughter: The Value and Care of Disabled Minds* (Oxford, UK: Oxford University Press, 2019).

9 Kittay uses the capitalized CARE to distinguish her normative conception of care from other meanings of care. See Kittay, *Learning from My Daugher,*

137,

10 Kittay, *Learning from My Daughter,* 135.

11 Kittay, 175.

12 Kittay*,* 163.

13 Kittay, 8.

14 Josh Dohmen, "A Little of Her Language: Epistemic Injustice and Mental Disability." *Res Philosophica* 93, no. 4 (2016): 669-691; Christopher Hookway, "Some Varieties of Epistemic Injustice: Reflections on Fricker," *Episteme* 7, no. 2 (2010): 151-163; Dohmen, "A Little of Her Language," 688.

15 Dohmen, 688.

16 Hookway, "Some Varieties of Epistemic Injustice."

17 Kittay, *Learning from My Daughter*, 8.

18 Biklen and Burke, "Presuming Competence," 172.

19 Anne M. Donnellan, "The Criterion of the Least Dangerous Assumption," *Behavioral Disorders* 9, no. 2 (1984): 141-150.

20 Our thanks to Jaime Ahlberg, whose response essay comments helped us to think through these points.

21 Will Kymlicka, *Liberalism, Community and Culture* (Oxford: Oxford University Press, 1989).

22 Michael Berube, *The Secret Life of Stories* (New York: NYU Press, 2016).

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