Freedom of Conscience: What It Is and Why We Should Care

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We often use the phrase liberal democracy, but we don't often think about it very carefully. The noun points to a particular *structure* of politics in which decisions are made, directly or indirectly, by the people as a whole; and more broadly, to an understanding of politics in which all legitimate power flows from the people. The adjective points to a particular understanding of the *scope* of politics, in which the domain of legitimate political decision-making is seen as inherently limited. Liberal governance acknowledges that important spheres of human life are wholly or partly outside the purview of political power. It stands as a barrier against all forms of total power, including the power of democratic majorities.

The question then arises, how are we to understand the nature and extent of limits on government? The signers of the Declaration of Independence appealed to the self-evidence of certain truths, among them the concept of individuals as bearers of rights that both orient and restrict governmental power. Today, individual rights represent an important (some would say dominant) part of our moral vocabulary. The question is whether they are sufficient to explain

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and justify the full range of constraints we wish to impose on the exercise of public power, for example the limits on government's right to intervene in the internal affairs of civil associations and faith-based institutions.

In a recent book, *Liberal Pluralism,* I argue that we must develop a more complex theory of the limits to government. In this endeavor, three concepts are of special importance.[1] The first is *political pluralism,* an understanding of social life that comprises multiple sources of authority – individuals, parents, civil associations, faith-based institutions, and the state, among others – no one of which is dominant in all spheres, for all purposes, on all occasions.

Political pluralism is a politics of recognition rather than construction. It respects the diverse spheres of human association; it does not understand itself as creating or constituting those activities. For example, families are shaped by public law, but this does not mean that they are socially constructed. There are complex relations between public law and faith communities, but it is preposterous to claim that the public sphere constructs those communities, any more than environmental laws create air and water. Because so many types of human association possess an identity not derived from the state, pluralist politics does not presume that the inner structure and principles of every sphere must mirror those of basic political institutions. For example, in filling positions of religious authority, faith communities may use, without state interference, gender-based norms that would be forbidden in businesses and public accommodation.

The second key concept is *value pluralism,* made prominent by the late British philosopher Isaiah Berlin. This concept offers an account of the moral world we inhabit: while the distinction between good and bad is objective, there are multiple goods that differ qualitatively from one another and which cannot be rank-ordered. If this is the case, there is no single way of life, based on a singular ordering of values, that is the highest and best for all individuals. This has important implications for politics. While states may legitimately act to prevent the great evils of human existence, they may not seek to force their citizens into one-size-fits-all patterns of desirable human lives. Any public policy that relies upon, promotes, or commands a single conception of human good or excellence is on its face illegitimate.

The third key concept in my account of limited government is *expressive liberty*. Simply put, this is a presumption in favor of individuals and groups leading their lives as they see fit, within the broad range of legitimate variation defined by value pluralism, in accordance with their own understandings of what gives life meaning and value. Expressive liberty may be understood as an extension of the free exercise of religion, generalized to cover comprehensive conceptions of human life that rest on non-religious as well as religious claims.

The concept of expressive liberty yields an understanding of politics as an instrumental rather than ultimate value. Politics is purposive (which is why the critical phrase "in order to" immediately follows "We the People"); we measure the value of political institutions and practices by the extent to which they help us attain the ends for which they were established. In a liberal pluralist regime, a key end is the creation of social space within which individuals and groups can freely pursue their distinctive visions of what gives meaning and worth to human existence. There is a presumption in favor of the free exercise of this kind of purposive activity, and a liberal pluralist state bears and must discharge a burden of proof whenever it seeks to restrict expressive liberty.

FREEDOM OF CONSCIENCE: TWO CASES

Debates over the nature and extent of freedom of conscience offers important insights into expressive liberty. To frame this inquiry, I begin by recalling an important but largely forgotten episode in U.S. constitutional history: a rapid and almost unprecedented turnabout by the Supreme Court on a matter of fundamental importance. I begin my tale in the late 1930s.

Acting under the authority of the state government, the school board of Minersville, Pennsylvania, had required both students and teachers to participate in a daily pledge of allegiance to the flag. In the 1940 case of *Minersville v. Gobitis*, the Supreme Court decided against a handful of Jehovah's Witnesses who sought to have their children exempted on the grounds that this exercise amounted to a form of idolatry strictly forbidden by their faith.[2] With but a single dissenting vote, the Court ruled that it was permissible for a school board to make participation in saluting the American flag a condition for attending public school, regardless of the conscien-

tious objections of parents and students. Relying on this holding and quoting liberally from the majority's decision, the West Virginia State Board of Education issued a regulation making the flag salute mandatory statewide. When a challenge to this action arose barely three years after *Gobitis*, the Court reversed itself by a vote of six to three.[3] To be sure, during the brief interval separating these cases, the lone dissenter in *Gobitis* had been elevated to Chief Justice and two new voices, both favoring reversal, had joined the court, while two supporters of the original decision had departed. But of the seven justices who heard both cases, three saw fit to reverse themselves and to set forth their reasons for the change.

This kind of abrupt, explicit reversal is very rare in the annals of the Court, and it calls for some explanation. A clue is to be found, I believe, in the deservedly well-known peroration of Justice Jackson's majority decision overturning compulsory flag salutes:

> If there is any fixed star in our constitutional constellation, it is that no official, high or petty, can prescribe what shall be orthodox in politics, nationalism, religion, or other matters of opinion or force citizens to confess by word or act their faith therein. If there are any circumstances which permit an exception, they do not now occur to us. We think the action of the local authorities in compelling the flag salute and pledge transcends constitutional limitation on their power and invades the sphere of intellect and spirit which it is the purpose of the First Amendment to our Constitution to reserve from all official control.[4]

I want to suggest that the protected "sphere of intellect and spirit" and the antipathy to forced professions of faith to which Jackson refers enjoy a central place in the development of American political thought and in liberal political theory more generally. Expounded under the rubric of "conscience," it provides one of the clearest examples of expressive liberty, and of limits to legitimate state power.

Gobitis and *Barnette* bring into play a number of issues much debated among students of jurisprudence and political theory dur-

ing the past decade: the clash between history-based and principle-based interpretations of constitutional norms; the roles of courts and legislatures in a constitutional democracy; the competition between parents and the state for control of education; the appropriate contents and limits of civic education. The deepest issue is the relative weight to be given to claims based upon individual liberties and those based upon social order and cohesion. Legal doctrines of presumption, burden of proof, and tests ("rational basis," "compelling state interests," "clear and present danger") serve as proxies for competing moral intuitions and judgments.

Writing for the majority in the Pennsylvania case, Justice Frankfurter offered an argument in favor of a democratic state whose legitimate powers include the power to prescribe civic exercises such as the flag salute. He began by locating the controversy in a complex field of plural and competing claims: liberty of individual conscience versus the state's authority to safeguard the nation's civic unity. The task is to "reconcile" these competing claims, which means "prevent[ing] either from destroying the other." Because liberty of conscience is so fundamental, "every possible leeway" should be given to the claims of religious faith. Still, Frankfurter reasoned, the "very plurality of principles" prevents us from establishing the "freedom to *follow* conscience" as absolute.[5]

Frankfurter insisted that "The mere possession of religious convictions which contradict the relevant concerns of a political society does not relieve the citizen from the discharge of political responsibilities."[6] This premise raises the question of what must be added to "mere possession" to create a valid claim against the state. When (if ever) does the Constitution require some individuals to be exempted from doing what society thinks is necessary to promote the common good? Conversely, what are the kinds of collective claims that rightly trump individual reservations?

Frankfurter offers a specific answer to the latter, as follows: Social order and tranquility provide the basis for enjoying all civil rights – including rights of conscience and exercise. Indeed, all specific activities and advantages of government "presuppose the existence of an organized political society." Laws that impede religious exercise are valid when legislature deems them essential to secure civic order and tranquility. National unity is the basis of

national security – a highest-order public value (as we would now say, a "compelling state interest"). National unity is secured by the "binding tie of cohesive sentiment," which is the "ultimate foundation of a free society." This sentiment, in turn, is fostered by "all those agencies of the mind and spirit which may serve to gather up the traditions of a people, transmit them from generation to generation, and thereby create that continuity of a treasured common life which constitutes a civilization."[7]

If the cultivation of unifying sentiment is a valid end of government action, Frankfurter concluded, then courts should not interfere with legislative determinations of appropriate means. We do not know what works and what does not; we cannot say for sure that flag salutes are ineffective. In judging the legislature, we may use only the weakest of tests: is there any rational basis for the means the legislature has chosen to adopt? If there is, the courts must stay out.[8] But if satisfying the weakest test is enough, then the countervailing claims cannot be that important after all. So religious free exercise, which at the beginning of Frankfurter's opinion is characterized as "so subtle and so dear" as to require every possible deference, is reduced to a near-nullity by the end.

Toward the conclusion of his opinion, Frankfurter touched on an issue that figures centrally in our current debates – the right of public authorities "to awaken in the child's mind considerations … contrary to those implanted by the parent."[9] He is right to suggest that the bare fact of a clash with parents does not suffice to render a state's action illegitimate. But who seriously thinks that parental claims are always trumps? The thesis is rather that there are certain classes of claims that parents can interpose against state authority especially when the state employs particularly intrusive means in pursuit of public purposes. Recall that what was at stake in *Gobitis* was not just the right of the state to require civic education; it was the state's power to compel students to engage in affirmations contrary to conscientious belief. It is not unreasonable to suggest that compelling the performance of speech and deeds contrary to faith is a step even graver than prohibiting activities required by faith and places the state under an even heavier burden to justify the necessity of its coercion.

Frankfurter rejected imposing such a burden on the state. Quite the reverse: to foster social order and unity, he asserted, the

state "may in self-protection utilize the educational process for inculcating those almost unconscious feelings which bind men together."[10] And if the state gets it wrong? Frankfurter answered this question, and concluded his opinion, with a profession of faith in the democratic process: It is better to use legislative processes to protect liberty and rectify error, rather than transferring the contest to the judicial arena. As long as the political liberties needed for effective political contestation are left unaffected, "education in the abandonment of foolish legislation is itself a training in liberty [and] serves to vindicate the self-confidence of a free people."[11] There is clearly some wisdom in this position, which is enjoying a perceptible resurgence today. What it overlooks is the cost – especially to the most affected individuals and groups – of waiting for a democratic majority to recognize its mistake.

I turn now to Justice Jackson's majority opinion in *Barnette,* a highlight of which we have already encountered.

Jackson did not question that state's right to educate for patriotism and civic unity. But in his view, what was at stake was not education, rightly understood, but something quite different: "Here … we are dealing with a compulsion of students to declare a belief."[12]

> [C]ensorship or suppression of expression of opinion is tolerated by our Constitution only when the expression presents a clear and present danger of action of a kind the State is empowered to prevent and punish. It would seem that involuntary affirmation could be commanded only on even more immediate and urgent grounds than silence. But here the power of compulsion is invoked without any allegation that remaining passive during a flag salute ritual creates a clear and present danger that would justify an effort even to muffle expression. To sustain the compulsory flag salute we are required to say that a Bill of Rights which guards the individual's right to speak his own mind, left it open to public authorities to compel him to utter what is not in his mind.[13]

The issue, Jackson asserted, is not one of policy, that is, of effectiveness of means in pursuit of a legitimate end such as nation-

al unity. The prior question is whether the state possesses the rightful power to promote this end through compulsion contrary to conscience, a power the *Gobitis* majority assumed to inhere in our constitutional government. If it does not, then the issue is not exempting dissenters from otherwise valid policies, but rather reining in a state that is transgressing the bounds of legitimate action.[14]

Jackson insisted that limited government is not weak government. Assuring individual rights strengthens government by bolstering support for it. In the long run, individual freedom of mind is more sustainable and powerful than is "officially disciplined uniformity."[15] "To believe that patriotism will not flourish if patriotic ceremonies are voluntary and spontaneous instead of a compulsory routine is to make an unflattering estimate of the appeal of our institutions to free minds."[16]

> Limited government is not simply a wise policy, [Jackson argued]; it is also a matter of constitutional principle: The very purpose of a Bill of Rights was to withdraw certain subjects from the vicissitudes of political controversy, to place them beyond the reach of majorities and officials and to establish them as legal principles to be applied by the courts. One's right to life, liberty, and property, to free speech, a free press, freedom of worship and assembly, and other fundamental rights may not be submitted to vote; they depend on the outcome of no elections.[17]

Limitations on government affect means as well as ends. There is no question that government officials and institutions may seek to promote national unity through persuasion and example. "The problem is whether under our Constitution compulsion as here employed is a permissible means for its achievement."[18] It is in this context that Jackson penned his famous words about the fixed star in our constitutional constellation, the sphere of intellect and spirit that our laws protect from all official interference.

JURISPRUDENCE, MORAL INTUTITION, AND POLITICAL THEORY

I am not a legal historian. I have told this tale, not for its own sake, but with moral intent. I want to use these materials as a basis

for testing our judgments about two questions. First: looking at the judicial bottom-line – the "holding" – are we more inclined to favor the outcome in *Gobitis* or in *Barnette?* Second: what kinds of broader principles underlie our judgment concerning these specific cases?

It is easy to sympathize with Frankfurter's dismay at the deployment of judicial review to immunize concentrated economic power against public scrutiny; with his belief that democratic majorities should enjoy wide latitude to pursue the common good as they see it; with his belief that the requirements of social order and unity may sometimes override the claims, however worthy, of individuals, parents, civil associations, and religious faith; and with his conviction that the systematic substitution of judicial review for democratic self-correction can end by weakening citizenship itself. Nonetheless, I believe (and I am far from alone) Frankfurter's reasoning in *Gobitis* was unsound, and his holding unacceptable. There are certain goods and liberties that enjoy a preferred position in our order and are supposed to be lifted above everyday policy debate. If liberty of conscience is a fundamental good, as Frankfurter acknowledges, then it follows that state action interfering with it bears a substantial burden of proof. A distant harm, loosely linked to the contested policy, is not enough to meet that burden. The harm must be a real threat; it must be causally linked to the policy in question; and the proposed remedy must do the least possible damage to the fundamental liberty, consistent with the abatement of the threat. The state's mandatory pledge of allegiance failed all three of these tests. *Gobitis* was wrongly decided; the ensuing uproar was a public indication that the Court had gone astray; and the quick reversal in *Barnette*, with fully half the justices in the new six-member majority switching sides, was a clear indication of the moral force of the objections.

We now reach my second question: is our judgment on these cases a particularized moral intuition, or does it reflect some broader principles? The latter, I think. What Justice Jackson termed the "sphere of intellect and spirit" is at or near the heart of what makes us human. The protection of that sphere against unwarranted intrusion represents the most fundamental of all human liberties. There is a strong presumption against state policies that prevent individuals from the free exercise of intellect and spirit. There is an even stronger presumption against compelling individuals to make

affirmations contrary to their convictions.

This does not mean that compulsory speech is always wrong; courts and legislatures may rightly compel unwilling witnesses to give testimony and may rightly punish any failure to do so that does not invoke a well-established principle of immunity, such as the bar against coerced self-incrimination. Even here, the point of the compulsion is to induce individuals to tell the truth as they see it, not to betray their innermost convictions in the name of a state-administered orthodoxy.

It is easy for polities – even stable constitutional democracies – to violate these principles. But that democratic majorities can deprive minorities of liberty, often with impunity, does not make it right. Like all politics, democratic politics is legitimate to the extent that it recognizes and observes the principle limits to the exercise of democratic power. The liberties that individuals and the associations they constitute should enjoy in all but the most desperate circumstances go well beyond the political rights that democratic politics requires. We cannot rightly assess the importance of politics without acknowledging the limits of politics. The claims that political institutions can make in the name of the common good co-exist with claims of at least equal importance that individuals and civil associations make, based on particular visions of the good for themselves or for humankind. This political pluralism may be messy and conflictual; it may lead to confrontations not conducive to maximizing public unity and order. But if political pluralism, thus understood, reflects the complex truth of the human condition, then the practice of politics must do its best to honor the principles that limit the scope of politics.

The ensemble of principles I am invoking to unpack the intuition that *Barnette* was rightly decided embodies an understanding of politics as an instrumental rather than ultimate value. Politics is purposive and we measure the value of political institutions and practices by the extent to which they help us attain the ends for which they were established. In a liberal pluralist regime, a key end is the creation of social space within which individuals and groups can freely pursue their distinctive visions of what gives meaning and worth to human existence. There is a presumption in favor of the free exercise of this kind of purposive activity (which I call "expressive liberty"), and a liberal pluralist state

bears and must discharge a burden of proof whenever it seeks to restrict expressive liberty.

This standard for state action is demanding but not impossible to meet. While expressive liberty is a very important good, it is not the only good, and it is not unlimited. In the first place, the social space within which differing visions of the good are pursued must be organized and sustained through the exercise of public power; the rules constituting this space will inevitably limit in some respects the ability of individuals and groups to act as they see fit. Second, there are some core evils of the human condition that states have the right (indeed the duty) to prevent; to do this, they may rightly restrict the actions of individuals and groups. Third, the state cannot sustain a free social space if its very existence is jeopardized by internal or external threats, and within broad limits it may do what is necessary to defend itself against destruction, even if self-defense restricts valuable liberties of individuals and groups. A free society is not a suicide pact.

WHAT IS "CONSIENCE"?

There is a concluding ambiguity that I must now address. My announced topic in this talk is freedom of conscience. But what is "conscience," anyway? For James Madison and other 18th century thinkers, the term clearly pointed toward religious conviction. Although Justice Jackson's sphere of intellect and spirit includes religion, it encompasses much else besides. So is conscience to be understood narrowly or expansively?

We may approach this question from two standpoints, the constitutional and the philosophical. Within constitutional law, both the narrow and expansive views have found proponents among able interpreters of the First Amendment. On the narrow side, Laurence Tribe argues that "the Framers … clearly envisioned religion as something special; they enacted that vision into law by guaranteeing the free exercise of religion but not, say, of philosophy or science."[19] Christopher Eisgruber and Lawrence Sager object that "to single out one of the ways that persons come to understand what is important in life, and grant those who choose that way a license to disregard legal norms that the rest of us are obliged to obey, is to defeat rather than fulfill our commitment to toleration."[20] In effect, they argue that we must read the religion

clauses of the 1st Amendment in light of the Equal Protection clause of the 14th.

We see this debate playing out in a fascinating way in the evolution of the jurisprudence of conscience-based exemptions from the military draft. Section 6(j) of the WWII-era Universal Military Training and Service Act made exemptions available to those who were conscientiously opposed to military service by reason of "religious training and belief." The required religious conviction was defined as "an individual's belief in a relation to a Supreme being involving duties superior to those arising from any human relation, but [not including] essentially political, sociological, or philosophical views or a merely personal moral code."

In the case of *United States v. Seeger* (1965), however, the Court broadened the definition of religion by interpreting the statute to include a "sincere and meaningful belief which occupies in the life of its possessor a place parallel to that filled by the God of those admittedly qualifying for the exemption."[21] Five years later, in *Welsh v. United States,* a Court plurality further broadened the reach of the statute to include explicitly secular beliefs that "play the role of a religion and function as a religion in life." Thus, draft exemptions could be extended to "those whose consciences, spurred by deeply held moral, ethical, or religious beliefs, would give them no rest or peace if they allowed themselves to become a part of an instrument."[22]

For our purposes, the real action takes place in the penumbra of the plurality's opinion. Justice Harlan, who provided the fifth vote for the expansive reading of conscientious exemption, argued in a concurring opinion that while the plurality's interpretation of the statutory language was indefensible, the Court could and should save the statute by engaging in an explicit act of reconstruction. The reason: it would be a violation of both the Establishment and Equal Protection clauses for Congress to differentiate between religious and nonreligious conscientious objectors.[23] This is the judicial precursor of the Eisgruber/Sager position.

For their part, the three dissenters argued that while Harlan was right as a matter of statutory construction, he was wrong as a matter of constitutional interpretation. They wrote that "neither support nor hostility, but neutrality, is the goal of the religion clauses of the First Amendment. 'Neutrality,' however, is not self-defin-

ing. If it is 'favoritism' and not neutrality to exempt religious believers from the draft, is it 'neutrality' and not 'inhibition' of religion to compel religious believers to fight when they have special reasons for not doing so, reasons to which the Constitution gives particular recognition? It cannot be denied [the dissenters concluded] that the First Amendment itself contains a religious classification"– Lawrence Tribe's point exactly.[24]

To shed light on this dispute, it is useful to move outside the realm of constitutional adjudication and raise more general, even philosophical, considerations. There are, I suggest, two features of religion that figure centrally in the debate about religiously-based exemptions from otherwise valid laws. First, believers understand the requirements of religious beliefs and actions as central rather than peripheral to their identity; and second, they experience these requirements as authoritative commands. So understood, religion is more than a mode of human flourishing. Regardless of whether an individual experiences religious requirements as promoting or rather thwarting self-development, their power is compelling. (In this connection, recall the number of Hebrew prophets – starting with Moses – who experience the divine call to prophetic mission as destructive of their prior lives and identities.

My suggestion is that at least in modern times, some individuals and groups who are not religious come to embrace ensembles of belief and action that share these two features of religious experience – namely, identity-formation and compulsory power. It does not seem an abuse of speech to apply the term conscience to this experience, whether religious or non-religious. My concept of expressive liberty functions, in part, to support the claim that conscience in this extended sense enjoys a rebuttable presumption to prevail in the face of public law. In this respect, though not others, I find myself in agreement with Rogers Smith when he writes that

> the only approach that is genuinely compatible with equal treatment, equal protection, and equal respect for all citizens is treating claims of religious and secular moral consciences the same. Fully recognizing the historical, philosophical, and moral force of claims for deference to sincere conscientious beliefs and practices whenever possible, I would place all such claims in a 'preferred position' as

> defined by modern constitutional doctrines: governmental infringements upon such conscientious claims would be sustainable in court only if it were shown that they were necessary for compelling government interests.[25]

What are the kinds of collective interests that suffice to rebut the presumption in favor of individual conscience? I can think of at least two. First, the state cannot avoid attending to the content of conscience. Deep convictions may express identity with compulsory power and nonetheless be deeply mistaken in ways that the state may rightly resist through the force of law. And second, even if the content of an individual's conscientious claim is not unacceptable in itself, its social or civic consequences may expose it to justified regulation or even prohibition.

It may well be possible to add other categories of considerations that rebut the presumptions of conscience. In practice, the combined force of these considerations may warrant more restriction than accommodation. My point is only that the assertion of a conscience-based claim imposes a burden on the state to justify its proposed interference. There are many ways in which the state may discharge that burden, but if my position is correct, Justice Frankfurter's argument in *Gobitis* is not one of them. It is not enough to say that whenever a state pursues a general good within its legitimate purview, the resulting abridgement of conscience may represent unfortunate collateral damage but gives affected individuals and groups no legitimate grievance or cause of action. Claims of conscience are not trumps, but they matter far more than Frankfurter and his modern followers are willing to admit.

The ultimate reason is this: in a liberal democracy, the state is not an end in itself but rather a means to certain ends that enjoy an elevated status. The ability of individuals and groups to live in ways consistent with their understanding of what gives meaning and purpose to life is one of those ends. That is what I mean by expressive liberty. It may rightly be limited to the extent necessary to secure the institutional conditions for its exercise. Beyond that point, the rightful relation of ends and means is turned on its head. That is the line a liberal democratic state ought not cross.

NOTES

[1] William A. Galston, *Liberal Pluralism: The Implications of Value Pluralism for Political Theory and Practice* (New York: Cambridge University Press, 2002).

[2] 310 U.S. 586 (1940).

[3] *West Virginia v. Barnette,* 319 U.S. 624 (1943).

[4] 319 U.S. 642.

[5] 310 U.S. 591-594; italics mine.

[6] 301 U.S. 594-595.

[7] 301 U.S. 595-596.

[8] 301 U.S. 597-598, 599-600.

[9] 301 U.S. 599.

[10] 301 U.S. 600.

[11] Ibid.

[12] 319 U.S. 630.

[13] 319 U.S. 633-634.

[14] 319 U.S. 635-636.

[15] 319 U.S. 637.

[16] 319 U.S. 641.

[17] 319 U.S. 639.

[18] 319 U.S. 641.

[19] Laurence Tribe, *American Constitutional Law; Second Edition* (Mineola, NY: Foundation Press, 1988), p. 1189.

[20] Christopher L. Eisgruber and Lawrence G. Sager, "The Vulerability of Conscience: The Constitutional Basis for Protecting Religious Conduct," 61 *University of Chicago Law Review* (1994): 1315.

[21] 380 U.S. 163 (1965), at 176.

[22] 398 U.S. 333 (1970), at 339, 344.

[23] 398 U.S. 345, 356-57.

[24] 398 U.S. 372.

[25] Rogers M. Smith, "'Equal' Treatment? A Liberal Separationist View," in Stephen V. Monsma and J. Christopher Soper, eds., *Equal Treatment of Religion in a Pluralistic Society* (Grand Rapids, MI: Eerdman's, 1998), p. 193.