# Citizenship and Immigration: A Current Review[1]

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The presence of immigrants and their activities challenge traditional notions of citizenship centred on the conflation of national and state membership. Four dimensions of citizenship—defined here as membership in a socio-political community—are identified: legal status, rights, identity, and participation. Discussion centres on the constraints and determinants of naturalization, the extent to which rights are linked to personhood rather than membership in a nation-state, and the challenge to state identity and cohesion produced by multiculturalism. It is suggested that future research should consider citizenship as participation. This dimension highlights how immigrants' transnational activities challenge traditional views of citizenship. We cannot, however, dismiss the importance of the state. The concept of participation is therefore also important since it focuses attention on dynamic interactions between the individual and the nation-state.

La présence des immigrants et leurs activités remettent en question les notions traditionnelles de citoyenneté selon lesquelles les individus appartiennent à un État qui correspond à une nation. La citoyenneté, définie ici comme étant l'appartenance à une communauté socio-politique, comporte quatre dimensions: le statut légal, les droits, l'identité et la participation. Le débat est surtout axé sur les contraintes et les déterminants de la naturalisation, sur la relation entre les droits et le citoyen en tant qu'individu plutôt que membre d'un État-nation, et sur la menace que représente le multiculturalisme pour l'identité et la cohésion de l'État. Selon l'auteur, la dimension de participation sera une piste importante à suivre à l'avenir. Dans le cas des immigrants dont les activités sont transnationales, cette dimension montre les limites des idées traditionnelles de citoyenneté. Nous ne pouvons toutefois pas ignorer l'importance de l'État. Là encore, le concept de participation met en relief les interactions dynamiques entre l'individu et l'État-nation.

The past decade has seen a marked resurgence of discussion and interest in the concept of citizenship, with debates taking place not only in scholarly circles, but also among policy analysts, politicians, and in the popular press. At the cusp of a new millenium, it seems appropriate to review this literature. Of particular interest is how immigrants, through their migration and

presence, force us to rethink citizenship. This article surveys some of the academic debates on citizenship as they pertain to immigrants, focusing on North America and Western Europe.

The literature on citizenship and immigration is rich and varied and could be approached in a number of ways.[2] To help organize and structure the present review, I concentrate on citizenship as an analytical concept. At its most basic, citizenship can be defined as membership in a socio-political community. The two critical elements in this definition are the individual and the community. These elements are linked via a membership relation called citizenship. I further conceive of citizenship as incorporating at least four distinct dimensions: legal status, rights, identity, and participation. Figure 1 provides a conceptual map of citizenship.
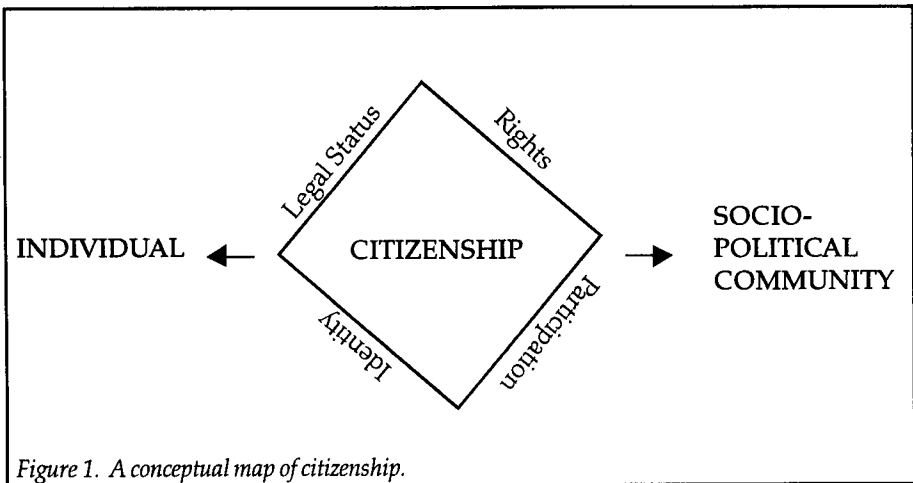


Figure 1. A conceptual map of citizenship.

Although the primary goal of the review is to use this conceptual map to organize the various debates and literatures pertaining to citizenship and immigration, I also suggest that future innovation in the field will probably centre on the participation dimension of citizenship. Participation creates a conceptual and empirical link between the individual and the socio-political community, thus introducing a key dynamic element into the study of citizenship. To the extent that the socio-political community determines the rules of entry into the collective (legal status) and the benefits associated with membership (rights), states have been a central focus within the citizenship literature. Although less able to control collective identities, states also exert powerful symbolic resources to shape this third dimension of citizenship. It is through participation that the other side of the citizenship equation—the individual—can be considered. If the state gives citizenship, there must be someone to take it, or if the state changes its approach to citizenship, an individual (or group of people) initiated that change.

Furthermore, "citizenship as participation" can act as a link between the different dimensions of citizenship.

This review is organized into three parts. First, there is a more extensive definitional discussion of citizenship. In particular, I concentrate on how the concepts of the citizen and the national have become conflated. It is partially a result of this conflation that immigrants challenge traditional notions of citizenship. Next, I examine three dimensions of citizenship—legal status, rights, and identity—moving from what appears to be the most objective dimension of citizenship to the most subjective. For each dimension, I highlight the role participation plays in shaping debates and how it might offer new avenues for future research. Finally, I consider participation as an independent dimension of citizenship, emphasizing its Janus-face. In one sense participation, especially political activity, reinforces traditional conceptualizations of citizenship centred on the nation-state, because political spaces are mostly delimited by states. Yet in another sense, immigrants' participation in global economic systems, transnational social spaces, international social movements, and the politics of their home countries undermines the link between citizenship and the nation-state, raising the possibility that some aspects of citizenship need to be reconceptualized.

*Defining Citizenship: The Citizen, Nationality, and the Nation-State*

The very definition of an immigrant is linked to the concept of citizenship. The term immigrant denotes someone from elsewhere who moves to a new place. He or she is an outsider both legally and socially. More precisely, and congruent with most empirical literature, an immigrant is someone born in one country who lives in another, usually with some intention of staying.[3] Yet even this seemingly straightforward definition becomes problematic when one considers the intersection of immigration and citizenship. For example, if German citizens live in the United States for a couple of years, have a child, and then move back to Germany, two paradoxes arise. First, because the German state will confer citizenship on the child of German parents, when the child moves back to Germany, he or she is not considered an immigrant even though of foreign birth. Conversely, if this German child decides to work in the US as an adult, he or she will not be an immigrant—despite having lived almost his or her whole life in Germany—because the US state accords citizenship based on territorial birth. Immigration and citizenship are so closely linked because, as much as the word immigrant denotes an outsider status, citizenship implies membership.

Citizenship was defined above as membership in a socio-political community. The socio-political community has taken various forms over time, but in today's world the key structure is the nation-state. In parallel, the concept of citizenship has existed in Western thought in one form or another

for thousands of years, from the Athenian city state, through the Renaissance and Enlightenment, until it gained renewed importance with the development of nation-states in the 19th century (Klusmeyer, 1996). This review focuses on contemporary definitions of citizenship, definitions intimately intertwined with ideals of the modern nation-state. These ideals create a conception of citizenship that conflates the national and the citizen.

Although few countries today can claim a perfect overlap of state and nation, this ideal is salient in public imagination and political discourse (Anderson, 1991; Gellner, 1983; Hobsbawm, 1992). The nation-state combines an effective and an affective element. The state can be considered an entity that is able to engage in effective political decision-making in a certain territory over which it exercises sovereignty, or control. The idea of nation is much more subjective, generally referring to affective sentiment. Although cultural similarity is often a basis for nationality, more important is mutual recognition. Gellner suggests that "two men are of the same nation if and only if they recognize each other as belonging to the same nation" (1983, p. 7, emphasis in original), whereas Anderson conceives of an "imagined community" and Weber defines the nation as a "community of sentiment" (1946, p. 176).

Each of the two elements of the term nation-state has a parallel term denoting membership. Membership in the nation makes one a national or gives one nationality, thus denoting one's place in the affective community. Membership in the state grants one the status of citizen, or gives one citizenship, according a say about the effective control of the state. Critical to understanding the current debates on citizenship is the recognition that nationality and citizenship have been conflated, implying membership both in a political community and in a collective identity.

The overlap of nationality and citizenship finds different expressions in diverse countries, but the coupling remains despite country-specific variations. Certain authors have distinguished Germany's ethnic-based citizenship from France's civic conception (Brubaker, 1992; de Wenden, 1987). However, as Weil (1996) notes, French ideals links citizenship, national identity, and voting through a process of socialization that is not value-neutral. Kymlicka (1995) argues along similar lines: the difference between so-called ethnic-based and civic-based citizenship is not one of culture versus contract, but a difference between a closed culture that excludes people who are different and an open culture, or national identity, that allows integration.

The recent interest in citizenship occurs as both academics and political activists challenge the implied equivalence between state and nation, citizen and national. Part of this debate has stemmed from the activism of "national" minorities within well-established states, such as Quebec and Aboriginal nationalism in Canada, Scottish nationalism in the United Kingdom, or Catalonian and Basque nationalism in Spain (Kymlicka, 1995;

Laponce & Safran, 1996). A second critical factor, and the focus of this re-view, is the challenge posed by massive international migrations, popula-tion shifts that bring people of different cultural backgrounds and religious traditions to countries that have considered themselves relatively homoge-neous nation-states. This migration challenge has been particularly strong in Western Europe: countries that historically were nations of emigration are now confronted with the reality of a heterogeneous population. Yet this challenge is also being felt in traditional immigrant-receiving countries since the "new immigrants"—those from South America, the Caribbean, Asia, and Africa—are bringing into question explicit or implicit cultures of Anglo-con-formity and white, Christian identities.[4]

## The Dimensions of Citizenship

### Legal Status

In its most basic form, citizenship denotes a legal status accorded by a state to an individual, a type of membership that Bauböck (1994) terms nominal citizenship. By granting a person citizenship, a state lays some obligations on the individual (e.g., the state might call upon the person in a time of war) and allows the individual to make claims in return (e.g., the right to access state territory). In the traditional model, each person in the world has a single citizenship and lives in his or her country of citizenship, thereby fa-cilitating the relationship between individuals and the state. Migration, how-ever, complicates this model. What is the legal relationship between the host country and the foreign migrant? To what extent can the home country, the country of citizenship, intercede to protect its citizens who live in an-other state? To whom does the individual owe allegiance, the country of citizenship or the country of residence?

The simplest way to avoid such complications is to have the migrant change citizenship. If he or she intends to reside for many years in a new country, legally it will be easier if the individual naturalizes, that is, changes his or her citizenship to that of the country of residence. Naturalization seems simple in theory, yet the practice can be quite complicated. Complex legal codes govern who are citizens, on what grounds outsiders can become citizens, and what exceptions, if any, might exist due to marriage, disability, and so forth. Naturalization policies and processes have come under in-creased academic scrutiny since the 1980s as scholars seek to understand cross-national variations in citizenship regulations and citizenship acquisi-tion.

There is a strong split in the literature between those who study West European states and those who focus on traditional immigrant-receiving countries such as the US, Canada, or Australia. Scholars interested in Eu-rope tend to study citizenship acquisition within a framework of legal

regimes. They focus mostly on the state as a grantor of citizenship status. Cross-national comparisons of legal codes are employed to highlight similarities and differences. The explanation for variability in naturalization rates across states is explained by making reference to unique country-specific features, not to immigrants' attributes. In contrast, researchers in North America, Australia, and New Zealand generally use a micro-level approach, focusing on immigrants choosing citizenship. This alternative emphasis is hardly surprising as naturalization in these countries has been relatively easy for most immigrants, with the historic exception of Asians (Price, 1974; Ueda, 1996; Smith, 1997).[5] Whereas the former approach sees the state granting legal citizenship according to its own logic, the latter considers how immigrants' motivations and attributes lead to naturalization.

Brubaker's (1992) comparison of France and Germany typifies the approach taken when studying European countries. Brubaker argues that French and German conceptions of citizenship are significantly different because of dissimilar national ideals rooted in particular political events and cultural geography. State-centred, revolutionary France developed an assimilationist and relatively inclusive framework of citizenship. In contrast, Germany—a national ideal before it became a state—has a Volk-centred, ethnic definition of the nation, which produces an exclusive citizenship regime. Brubaker illustrates this difference by noting that in Germany citizenship is mostly accorded along legal traditions of *ius sanguinis*, citizenship according to blood. In contrast, France also accords citizenship based on *ius soli*, citizenship by birth on a territory.

Despite historic differences, citizenship policies might slowly be converging in Europe. One factor encouraging convergence is the development of the European Union and the accompanying pressure for comparable policy stances (Soysal, 1996; Weil, 1996). Thus Germany has gradually moved to grant the possibility of German citizenship to the German-born children of migrant workers, contrary to *ius sanguinis*. European citizenship policies might also be moving closer to their North American counterparts, for example, in some cases residency requirements are getting shorter, fees are lower, and requirements of cultural adaptability are becoming less stringent. At the same time, there has been public debate in North America to make citizenship regulations more stringent.[6] In this sense, citizenship might be witnessing a convergence similar to that identified by Cornelius, Martin and Hollifield (1994) in the field of immigration policy. They argue that in industrialized, labour-importing countries, immigration laws, control measures, integration policies, and public opinion on immigration are becoming increasingly alike due to the pressures of new international regimes, economic flows, and liberal rights discourses. The appendix highlights naturalization policies for Canada, France, Germany, and the US in both the mid-1980s and 2000.

Mostly of an institutional bent, the literature on citizenship regulations has tended to focus exclusively on the state, employing macro-comparative methods. Framed thus, this scholarship usefully highlights the extent to which naturalization decisions are often beyond the control of migrants. Where laws are complex and requirements difficult, it is hard to naturalize, even if the immigrant strongly desires to do so. In contrast, the citizenship research in the traditional immigrant-receiving countries centres mostly on the micro-level, investigating the motivations and attributes of the individuals who acquire legal citizenship. Some work examines the development of citizenship laws in traditional immigrant-receiving countries (Ueda, 1982; Smith, 1997, on the US; Brown, 1996, on Canada), but most research has focused on who naturalizes and why. This research looks at the other side of the naturalization equation: while states set policies, immigrants must choose legal citizenship.

The vast majority of this work has been quantitative, employing census statistics, government figures, and survey data. On a theoretical level, the literature has not developed clearly defined models, although rough schools of thought can be discerned. The two dominant analytical frameworks employ either cost-benefit or integrationist explanations; alternative models include a psychological approach as well as an emerging interest in social contexts.

The least successful explanation of immigrant naturalization has been the psychological approach. Proponents claim that naturalization occurs after an immigrant changes his or her reference group and primary identity from the old country to the new one (Frideres, Goldenburg, Disanto, & Homa, 1987; Legendre & Shaffir, 1984; Wearing, 1985). Empirically, however, there has been little support for this hypothesis; scholars interested in psychological processes concede that there is scant evidence that identity shift plays a crucial role in the decision to acquire legal citizenship. Such findings are perhaps not surprising as identities can be multiple rather than zero-sum.

The cost-benefit approach is the simplest theory of naturalization. It argues that people take on a new citizenship if they believe that the benefits outweigh the disadvantages (Kelley & McAllister, 1982). Researchers thus focus on how factors such as education, income, or marital status affect the citizenship calculations migrants make. More sophisticated versions promote a contextual rational choice model where actors make choices embedded in the environment of the country from which they came (Jasso & Rosenzweig, 1986, 1990) or based on the social context of the country where they are residing (Yang, 1994).

In opposition to the cost-benefit approach is an integration or assimilation model of naturalization. Proponents view the acquisition of legal citizenship not as the product of cold calculation, but as the natural outcome of

an immigrant's integration into the social, economic, and cultural structures of society (Barkan & Kholov, 1980; Bernard, 1936; Evans, 1988; Liang, 1994). The more integrated one is, the more likely one is to naturalize. While theorizing the interaction between the individual and society, research in this tradition has generally not studied societal effects, instead concentrating on individuals. Level of integration is measured by such variables as immigrants' language ability and the presence of children in the family.

There is no consensus as to whether more support exists for the integration or cost-benefit approach to naturalization. This lack of consensus stems from at least two sources. First, there has been a notable lack of agreement on the the effect of the direction of many variables upon the propensity to naturalize. Thus whereas some researchers find that being married has a positive effect (Frideres et al., 1987; Yang, 1994), others have found no relation (Evans, 1988), and some have even found a negative one (Neice, 1978). Part of the lack of consensus might be due to methodological differences and flaws in older studies.[7] In the last decade, scholars have used a variety of sophisticated techniques that suggests future consensus might be easier to establish (Jasso & Rosenzweig, 1990; Liang, 1994; Yang, 1994). Particularly helpful would be longitudinal studies such as that reported by Portes and Curtis (1987).

In the event of consensus, there would remain a second critical problem in adjudicating between the cost-benefit and integration approaches. Quite simply, it is often not clear which theory a particular variable supports. There does seem to be some regularity to the finding that education has a curvilinear relationship to naturalization, that the probability of naturalization increases as length of residence increases, and that English-language ability is positively correlated with being a citizen.[8] Taking this last finding as an example, does the link between English ability and naturalization mean, as Evans (1988) and Liang (1994) argue, that English-language ability is a sign of integration? Or, as Jasso and Rosenzweig (1986, 1990) contend, does knowledge of English reduce the costs of naturalization by making the citizenship exam seem easier? Significant "conceptual bleeding" is found at the boundaries of both perspectives. What in one theory is a benefit, is a measure of integration for the other.

To date, many studies of naturalization have been state-centred or individual-centred, examining one side of the citizenship equation mostly in isolation from the other. A profitable direction for future research is to consider the acquisition of legal citizenship as a social process involving the interaction of the state, immigrant, and other societal groups. Along these lines, Alvarez (1987) underlines the importance of community organizations and networks in the naturalization process of Hispanic immigrants in the US, while Jones-Correa (1998a) points out that political parties in Queens, New York do not reach out to Hispanic immigrants, thereby failing to

encourage political participation and citizenship. Bloemraad (1999) sug-
gests government integration policies and state relations with community
groups might account for differences in naturalization rates between the US
and Canada.

Some North American researchers are consequently moving beyond
micro-level approaches to a deeper investigation of social contexts. At the
same time, certain European scholars are increasingly focused on the deter-
minants of naturalization, moving more toward a North American-style mi-
cro-level approach (de Rham, 1990; Clarke, van Dam, & Gooster, 1998). A
new theoretical synthesis might be appropriate at this time. As Portes and
Rumbaut (1996) have suggested for second-generation integration, we need
models that incorporate both micro-level decision-making and community
influences and state dynamics.

*Rights*

Rights are a second key dimension of citizenship. Once deemed a legal
citizen by a state, a number of rights and responsibilities have become at-
tached to this status over the course of the 19th and 20th centuries. The
central debate among scholars of migration and citizenship is the extent to
which rights remain linked to citizenship empirically, and the consequences
of such a linkage theoretically and normatively.[9]

Marshall (1964) provided the classic model of citizenship rights in his
study of the English working class. Marshall contends that there is a pro-
gression from granting civil rights—that is, equality before the law—to granting
political rights, namely universal suffrage. With the latter, workers were able
to demand the final set of rights associated with citizenship: social rights.
The presence of large numbers of migrants in liberal-democratic countries
and the rise in a global human rights discourse have led to critiques of this
linear model, as well as the relationship between rights and citizenship more
generally. Various authors maintain that in the late 20th century, most people,
even illegal entrants to a country, are accorded some basic civil rights, fol-
lowed by social rights, but only citizens enjoy political rights (Brubaker, 1989;
Layton-Henry, 1990; Soysal, 1994).[10]

Whereas Marshall claimed that workers needed to mobilize political
rights in order to achieve social rights, today social rights are given to people
residing in a country even if they are not citizens. Access to such social
rights, and the extent of them, differ from country to country, but most West-
ern states have found it hard to deny them to non-citizens. The case of the
1996 Welfare Reform Act in the US is notable for its attempt to go against the
trend of extending social rights to non-citizens. While there has long been
an American debate whether to give social benefits to illegal immigrants,
the 1996 Welfare Reform Act eliminated Supplemental Security Income (SSI)
benefits and food stamps to most non-citizen legal, permanent residents

then residing in the US, and to almost all future legal immigrants prior to naturalization. As the Western country with the weakest social security net, it is perhaps not surprising that this change occurred in the US. However, the American push to reaffirm the link between social rights and citizenship has been only partially successful; a number of the law's provisions have since been amended, or benefits provided by state governments.[11]

Especially in Europe, there now exists a population of immigrants, and in some cases their European-born children, who have resided 20 or 30 years in a country, but who remain non-citizens in a legal sense. Yet these people have often worked, been educated, and contributed to the society within which they live, and they are granted certain social and civil rights. Hammar (1989) suggests that such people, neither citizens nor strict foreigners, be considered "denizens: foreign citizens who have a secure permanent residence status, and who are connected to the state by an extensive array of rights and duties" (p. 84). Going further, Soysal (1994, 1996) argues that not only are there many new categories and statuses, but that citizenship itself is changing toward a postnational model. According to Soysal, international migration, new political bodies such as the European Union, and the international discourse of human rights have created a situation where rights are now deterritorialized and located in the person rather than in an individual's nationality-based relationship to a state. It is for this reason that states are unable to deny rights to non-citizens. Hollifield (1992) makes a similar argument, although he examines the phenomenon through the paradigm of liberalism: economic liberalism implies a free movement of people, while liberalism's emphasis on rights means that those who migrate cannot be treated as simple commodities.

Debates concerning the existence or possibility of a postnational citizenship revolve around two issues: control and morality. In terms of control, scholars disagree over the extent to which states exercise ultimate authority over rights. Hollifield (1992) contends that market forces are so strong that states become powerless in the face of labour migrations. At the same time, embedded liberalism makes it impossible to deny rights to migrants. Soysal (1994) adds that supranational regimes and human rights discourses challenge the ability of states to allocate rights on the basis of national belonging. In contrast, Brubaker (1992) warns that "those who herald the emerging postnational age are too hasty in condemning the nation-state to the dustbin of history" (p. 189) since citizenship continues to be "a powerful instrument of social closure" (p. x). States and state sovereignty continue to be guiding principles in the international system; the arrival of postnational citizenship remains a hasty conclusion (Schuck, 1998). Those in favor of postnational citizenship models respond that nation-states are not irrelevant—they still distribute rights—but the link between rights and national

citizenship has been severely challenged (Soysal, 1994; Baubock, 1994; Jacobson, 1996).

A second debate concerns the morality of linking rights to citizenship. In the US controversy centres on denying social rights to non-citizens; in Europe debates often focus on dual citizenship. In both cases discussion centres on the normative limits of state sovereignty. Carens (1989) maintains that although states might be legally free to accord citizenship status as they see fit, they are not morally free to do so because immigrants become members of the state through their life and work in a country. In contrast, Hailbronner (1989) has argued that citizenship is not a moral, but a political decision states make based on their history and traditions and in their own interest. Citizenship, according to Hailbronner, is an illusory solution to the problems of integrating foreigners in countries such as the German Federal Republic. States should not be forced to accord citizenship to any resident.

In both the normative debates and discussions over control, the state has generally been the focus of analysis: to what extent do states (and elite policy-makers) have freedom to link rights to citizenship, and ought they to do so? Eclipsed from the equation is the role of immigrants themselves and their participatory capacity. One of Marshall's (1964) central insights was that political rights were a necessary prior condition to social rights because it was only through political leverage that policy elites agreed to set up new programs. Yet in the case of immigrants, political rights have remained the most strongly linked to citizenship status (Miller, 1989), although a number of European countries now allow local voting rights for non-citizens, and citizenship in the European Union creates a new level of political rights.[12] There is a deep-seated resistance to extending political rights to non-citizens that probably stems from the link between citizenship, political rights, and national sovereignty: those who vote have influence over what the state does (Soysal, 1994; Schuck, 1998). Although immigrants might have various alternative means to influence policy-making, such as through disruption (de Wenden, 1987) or worker councils (Vranken, 1990), if they lack a vote at the national level it is easy for politicians to use them as scapegoats and to enact legislation against their interests (Schönwälder, 1996).

Much of the current literature, especially that centred on Europe, tends to endorse an extension of political rights to immigrants, either through easier naturalization processes or by granting voting rights regardless of citizenship status. A variety of reasons have been given in defence of such a position (Rath, 1990). Some offer an exchange or reciprocity rationale, contending that because migrant workers contribute to the economy in the form of their labour, and to the state in the form of taxes, they have the right to influence how those taxes are used and how society is to be run. As Cesarini and Fullbrook (1996) reason, "'no taxation without representation' has, after all, a respectable political ancestry" (p. 214). This argument relies on notions

of fairness and return, but could exclude migrants who do not work. If political rights are linked to one's contribution in the economy, class (and gender) hierarchies will (re-)invade the franchise. More broad-based reasons for the extension of political rights include claims of societal membership (Carens, 1989; Bauböck, 1994) or appeals to human rights. In a different vein, the extension of political rights has also been supported based on the interests of the state. If significant segments of a country's population do not have a right to vote, the integrity of liberal-democracy is undermined (Layton-Henry, 1990; Schuck, 1998).

However, if voting rights were to be extended to non-citizens, what relevance, if any, would citizenship retain? Schuck (1998) argues that there has been a progressive devaluation of citizenship as the rights and privileges accorded to citizens no longer differ very much from those accorded to immigrants. Schuck considers the American case. Although he concedes that there might be a rise of individualism and an "entitlement mentality" undermining "public-spiritedness" if people are not obliged to become citizens, he nonetheless argues that the eclipse of citizenship as a central status is not dangerous. Other more fluid forms of membership will arise, and the extension of rights regardless of citizenship can be considered an enhancement of liberal principles of inclusiveness and equality. Nonetheless, the idea of giving voting and other political rights to non-citizens seems to create anxiety for many native-born citizens as they wonder whether newcomers will be loyal to their new country (Portes & Rumbaut, 1996). Even Schuck (1998), who supports dual citizenship for American citizens, advocates modifying the citizenship oath so that new citizens must pledge their "core political loyalty" to the US (pp. 229-247; for opposing views see Hammar, 1989; Spiro, 1997). Given the political nature of the state, political rights remain an area of serious contestation.

*Identity*
As outlined above, citizenship denotes membership in a socio-political community, which in the contemporary period means membership in a nation-state. If the link between citizenship and (political) membership in the state generates controversy when discussing immigration, so too does the question of immigrants' membership in the national community, an aspect I label the identity dimension of citizenship. Turner (1997) suggests that all societies have both the allocative requirement to dispense scarce resources and an integrative requirement to cement secular society. Some commentators fear that if citizenship is being devalued, so too is the national community (Schlesinger, 1991). The focus in this section is on identity debates and the movement to asymmetrical, or multicultural, views of citizenship. There is again a link to participation: it is variously assumed that inclusion into a

collective identity will enhance participation or that participation itself can generate community.

In a review essay of citizenship theory, Kymlicka and Norman (1994) suggest that one reason for the explosive interest in citizenship during the 1990s is because citizenship integrates two sides of the liberal-communitarian philosophical debates of the 1970s and 1980s. Citizenship is intimately linked to ideas of individual entitlement (rights) as advocated by liberals, and it embodies attachment to a particular community (identity), the focus of communitarians' writing. For communitarians, the very act of coming together, arguing over political decisions, and then trying to decide the best course for the collective creates a distinct communal identity. Whether embodied in Aristotle's political animal or Machiavelli's concept of virtue, citizenship implies community. In contrast, the traditional liberal view maintains that the state should be neutral, leaving citizens free to pursue their individual goals. It should not be a community or promote any specific view of the "good life."

One can question whether a state is ever completely culture-free or value-neutral. Smith (1997) argues forcefully that even the US, often held up as a model of liberal citizenship, has always contained a strong and deep-seated "ascriptive Americanism" at the heart of its citizenship policy. Existing in parallel to liberal and republican ideals, ascriptive America-nism provides a sense of "peoplehood" that liberalism has difficulty gene-rating. It is thus attractive both to those included in this membership category and to the politicians who wish to lead the nation-state. Whether in North America, Europe, or elsewhere, a critical citizenship question dominates the contemporary period: how can a society create communal loyalty and a sense of solidarity from difference? Is *e pluribus unum* possible?

The main liberal response to this question is found in the work of Rawls (1971). The traditional liberal view essentially posits an atomized society— one where individuals have different interests and goals while the state is neutral—and it offers few means of creating social cohesion. Rawls attempts to address this problem by imaging an "original position" where people are put behind a "veil of ignorance." Not knowing where they will end up in society—rich or poor, of the dominant cultural group or not— rational people would agree that society should be constituted in such a way as to ensure, first, a fully adequate scheme of basic rights and liberties, and second, that inequalities must work in such a way as to benefit the most disadvantaged person in society. For Rawls, this is "justice as fairness," a concept shared by all in a liberal society. It provides social unity and allegiance even though individuals possess different conceptions of the good life.

Rawls' (1971) work was critical in moving liberalism beyond utilitarian, interest maximization to include the idea of community and bonds. As such,

his work has often been the centre of debates regarding citizenship. With regard to immigration, however, Rawls' original thought-experiment seems to have a fatal flaw: he predicates his whole discussion on a closed society where members neither leave nor enter. There is no explicit place for immigration in his theory. It could be argued that justice as fairness might be a good glue—indeed, perhaps the only glue—by which people of diverse cultures and backgrounds can be integrated. In this regard, the American oath of allegiance that new citizens must swear embodies such a liberal vision: it requires citizens to "support and defend the Constitution and laws of the United States of America."

The oath of allegiance acts as a model for Schuck and Smith (1985), who support a consensual view of American citizenship. They believe that the children of illegal immigrants and of temporary residents born on US soil should not be given automatic American citizenship. They recognize that denying such children American citizenship might create inequalities and might be unfair (as children are punished for their parents' actions). Yet Schuck and Smith maintain that because illegal immigrants are in the country against the will of the state, the state cannot consent to granting citizenship to the children of such individuals. According to Schuck and Smith, not only must the recipient of citizenship be in agreement, but so too must the state, or the US Congress as the voice of the state. Schuck and Smith maintain that a consensual American citizenship requiring that both parties consent would be "more legitimate in theory, more flexible in meeting practical policy problems, and more likely to generate a genuine sense of community among all citizens" (p. 5).

Whether a communal identity arises from justice as fairness or from the consensual nature of citizenship, the liberal perspective has been attacked as (a) unrealistic, (b) unacceptably "thin" and (c) unfair. Communitarian critics argue that thought-experiments concerning an "original position" are unrealistic because such a time never existed. More important, liberals ignore the critical point that no one is born an atomized, rational actor. As Sandel (1984) argues, "we cannot conceive our personhood without reference to our role as citizens, and as participants in a common life" (p. 5). People are born into families, societies, and cultures that shape their outlook and their conceptions of the good life to such an extent that they shape the individual himself or herself (Sandel, 1982).

Because liberalism fails to recognize that being part of a community is a primordial good, it is claimed that the liberal conception of citizenship is unacceptably thin. Walzer (1982) argues that rather than ignore individuals' ethnic and cultural heritages, these must be recognized as constituting the individual so as to encourage participation by all. Liberalism allows individuals in the polity to remain passive: once the rules of liberalism have been accepted, individuals may—indeed, are expected—to concern

themselves with their private goals and activities. Walzer argues instead that participation in the polity—acting upon one's citizenship—is critical to providing people with a sense of common identity. This participation might be through direct contact with the state, or in civil society through interaction with other groups and people (Walzer, 1998). To ensure a robust citizenship, Walzer suggests that the state needs to be decentralized so that there are more opportunities for citizens to take responsibility; the economy needs to be socialized so there is greater diversity; and nationalism must be pluralized in such a way that different historic identities continue to exist.

A third critique of liberalism's approach to citizenship and identity charges that the liberal paradigm is inherently unfair in its broad, universal citizenship. Young (1989) suggests that the illusion of considering all citizens equal—whereas in fact there exist significant differences in capacities, cultures, and values—merely sustains the privileged status of some groups and perpetuates the disadvantage of others. Ignoring difference, as is done under universal citizenship, preserves inequality. Young also challenges elements of communitarian thinking. Since the "common life" arising from universal citizenship frequently represents the views of those in privileged positions, oppressed groups are ignored. Young consequently advocates "differentiated citizenship." Differentiated citizenship must be institutionalized in the state through such means as guaranteed group rights and group representation. It is not entirely clear to what extent a common identity springs from such a differentiated citizenship, but it is clear that the institutional inclusion Young advocates is meant to bring outsider groups into the state and, one could assume, into the national community.

Young's (1989) notion of differentiated citizenship is echoed in two other formulations of citizenship—one based on liberalism, another on communitarian thinking—that envisage a community of citizens arising from differential inclusion. In his book Multicultural Citizenship, Kymlicka (1995) builds on liberalism's foundations to contend that it is impossible for people to assert their individual rights if a person's cultural community is not protected. In the case of immigrants, they may demand multicultural (or polyethnic) rights in order to express their cultural particularities without hampering their success in the economic and political institutions of the dominant society. Integration thus demands some respect for difference. Kymlicka proposes that groups be accorded external rights, which they can claim against the majority as a protection for their cultural specificity. He underlines, however, that in accordance with liberal principles of liberty and freedom, such groups cannot be given internal rights, which force members to follow the group's cultural practices against their will. The individual is always free to leave the group; if he or she chooses to stay, however, he or she should be assured that his or her group will remain vibrant. Kymlicka suggests that granting special group rights to ethnic communities would aid

in generating a sense of community because "the members of certain groups are incorporated into the political community, not only as individuals, but also through the group" (p. 174). Thus immigrants and their descendants can have a double tie to the state, both individually and through their group membership.

Communitarian Taylor (1991) calls such double incorporation "deep diversity." Going slightly further than Kymlicka, Taylor maintains that all individuals in a society do not necessarily need direct ties to the state as liberal citizenship suggests. Rather, some people's ties might be mediated entirely through the group. Taylor claims that "we must accommodate not only a diversity of cultural groups, but also a diversity of ways in which the members of such groups belong to the larger polity" (p. 75). Taylor's argument centres mostly on the incorporation of national minorities such as the Québécois, but his approach could be relevant for some migrant groups.

The idea of multicultural citizenship is not without its critics. Gignac (1997) argues that the communitarian focus on the common good means that outsider groups are only acceptable to the extent they contribute to, and are part of, that common good. If groups attempt to fragment the whole, they must be rejected or controlled, thus negating their difference. Gignac finds the liberal view superior because it has a place for inter-group conflict, but he points out that granting rights to a group reifies that group's boundaries. Borrowing from Foucault, Gignac suggests that recognizing group difference might merely be a way to control it. Along the same lines, Bissoondath (1994) maintains that celebrating cultural differences and insisting on hyphenated names (such as Chinese-Canadian or Mexican-American), ghettoizes minority peoples from the mainstream. "Multiculturalism" and "celebration of difference" are attacked as an inherently fragmentary and antithetical to Canadian (Bissoondath, 1994) or American (Schlesinger, 1991) citizenship.

In both North America and Europe, fierce debates on the subject of multicultural citizenship rage (Gutmann, 1994; Wieviorka, 1996). There is no consensus as to the best approach for using citizenship to create a collective identity, nor as to whether this goal is even worthwhile. Surprisingly, the extent to which these philosophical discussions reflect immigrants' own perceived identities has been much less a subject of scholarly research. Some initial findings suggest that immigrants to North America feel as American or Canadian as their native-born counterparts, and perhaps in some cases more so. For example, de la Garza, Falcon and Garcia (1996) compared the reported patriotism of Mexican-Americans (both first-and second-generation) with that of Anglo-Americans and found that Mexican-Americans in a number of cases expressed greater patriotism once demographic controls were introduced. In Canada, Kalin (1996) reports results from a national survey that indicate residents from a variety of ethnic backgrounds

overwhelmingly self-identify as Canadian before mentioning an ethnic identity. Howard (1998) discusses similar findings based on qualitative interviews with civic leaders in the Hamilton, Ontario area; immigrants generally expressed strong sentiments of feeling Canadian, praising Canadians' unique characteristics as well as the freedom and opportunity they enjoyed in their new home. There is a need for a sustained, in-depth conversation between those who theorize the identity dimension of citizenship and those who have engaged in empirical research regarding immigrants' own views and feelings.

## Future Directions: Citizenship as Participation

The lens of participation is one of the most traditional ways of seeing citizenship—after all, in ancient Athens only citizens could participate in political life or engage in certain economic projects. Because the boundaries of many activities overlap with geo-political borders, participatory citizenship often focuses on the nation-state, reinforcing traditional views. Yet the lens of participation is also an area for future innovation. Participation—in the form of economic activity, social involvement, or political engagement—can span geo-political boundaries: immigrants might participate in their host country, their home country, both, or in some other space, such as through informal international networks. Such transnational participation raises the question of whether citizenship, bounded as it is to membership in a specific nation-state, remains an adequate way of organizing status, rights, and identity in the contemporary period given that participation transcends traditional socio-political communities.

Because the literature on participation is so large, and could itself merit a separate review, this final section merely highlights two ways in which the lens of participation provides new ways of exploring citizenship. First, participation provides a means to investigate the dynamic between individual immigrants' agency and the structural or institutional constraints they face in exercising that agency. Thus we can link both the individual and the state, two sides of the citizenship equation, and also bring in other participants such as societal groups and ethnic associations. Second, participation in transnational space, and the implications of such participation, bring us back full circle to reconsider the link between citizenship and nation-states.

### The Participation Dynamic: Agency and Structure

The participation dynamic reveals clearly that immigrants' actions can succeed in changing the social context in which they find themselves, but at the same time this context structures the forms participation can take. Through this interaction, the meaning of immigrant citizenship is defined and redefined, introducing a dynamic element into citizenship definitions. Because the link between citizenship and political rights is that most tenaciously

held by lawmakers and the general public, I focus mostly on political participation.

Immigrants have clearly been the object of politics: for example, the German party system has been reconfigured as class and race issues become intertwined (Faist, 1995), whereas in France new parties of the right have emerged and splits in the left can be attributed to the issue of migration (de Wenden, 1987). However, immigrants can also be political actors influencing the political systems of immigrant-receiving countries. For example, in France, Franco-Maghrebis (French citizens of North African origins and dual nationality) have, according to Feldblum (1993), shifted French politics toward an "Anglo-Saxon" model of interest group politics. Although this shift is by no means complete, de Wenden (1987) similarly notes that immigrant urban youth movements have challenged standard French political discourse by promoting the public recognition of cultural differences, rather than relegating them to the private sphere (Silverman, 1996). Such challenges have directly attacked French conceptions of citizenship. There has been some movement away from the traditional French ideal of direct civic relations between the French state and the individual citizen stripped of any personal particularities.

Because in many cases immigrants in Europe have not naturalized and do not possess many formal political rights, European scholars have often been more creative in their conceptions of political participation than their counterparts who study North America. For example, immigrant workers have changed French political space by introducing cultural issues and collectivist claims during industrial conflicts (de Wenden, 1987; Vranken, 1990). Other forms of protest politics available to non-citizens include mass demonstrations, hunger strikes and the use of diplomatic pressure through foreign embassies. In traditional immigrant-receiving countries, where naturalization is much more widespread, political participation is often considered as activity within the electoral system. The benefit of investigating electoral participation is the wide variety of immigrants who are involved; for example, voting can be engaged in by more people at lower cost than a public demonstration or a hunger strike. On the other hand, researchers studying immigrant political participation in traditional receiving countries could also expand their conception of the political to include non-institutional forms of participation.

In an excellent review of the Canadian literature on immigrant political participation, Stasiulis (1997) notes, first, the relative dearth of research on the topic and, second, the conservative manner in which immigrants are included. Most scholarly work examines phenomena such as voting patterns and election results, merely adding immigrants into the analysis as a new category. They are either left as an undifferentiated group or broken down by country of origin. Majority political patterns are often used as a

benchmark, and participation by immigrants in their ethnic community is rarely considered, as mainstream politics is the analytical norm (but see Breton, 1991). The general conclusion from this research seems to be that over time, immigrant political participation across a range of measures—such as voting, campaigning, or contacting officials—is similar to that of native-born Canadians, although there is some variation depending on country of origin (Black, 1987, 1991; Chui, Curtis & Lambert, 1991). At an elite level, ethnic community leaders are highly interested in and knowledgeable about Canadian politics (Simard, 1991), and increasing numbers of elected federal politicians are from minority ethnic backgrounds, although these groups are still by and large underrepresented given their proportion in the national population (Black & Lakhani, 1997).

In the US, contemporary immigrant participation is almost invariably subsumed within the field of minority politics. In reported findings it is often difficult to know whether "Asian-Americans" or "Latinos" are immigrants or US-born and whether place of birth makes a difference in a study's results. Tentatively, it seems that Hispanic immigrant citizens participate in electoral politics and other mainstream political activities at levels almost comparable to those of the native-born once controls have been introduced for socio-economic status, but Asian immigrants tend on most measures to be less active than White and Black native-born groups (Lien, 1994; Uhlaner, 1996; Uhlaner, Cain, & Kieweit, 1989; Verba, Schlozman, Brady, & Nie, 1993). Stasiulis's (1997) critique regarding the lack of research and the secondary position of immigrants in the literature on political participation can apply as readily to the US as to Canada.

Although in some cases placing immigrants into the general category of minority might be helpful, there are a number of reasons to believe that immigrants, and possibly their children, face unique circumstances. In a study of black immigrants and New York Politics, Kasinitz (1992), found that on some issues, such as those related to discrimination, West Indians willingly formed political coalitions with African-American leaders and organizations. Around other issues, however, these immigrants celebrated their unique cultural heritage and were involved in New York's politics as an ethnic, not minority, group. In contrast to the native-born, immigrants might also feel torn between the sending and receiving country, forced to practice a "politics of in-between" (Jones-Correa, 1998a). Jones-Correa documents how immigrant Latinos in Queens, NY identify with both countries yet feel comfortable in neither. Often these immigrants do not acquire American citizenship because they do not want to appear disloyal to their country of origin; they consequently must practice politics at the margins. Both cases highlight the extent to which immigrant political participation merits study independent of the more general "minority politics" category.

Immigrants' agency within the political system should not obscure the

fact that immigrants also face numerous constraints that structure their actions. We have seen that citizenship regulations might make it difficult for immigrants to naturalize. Similarly, institutional factors can shape immigrants' participation. Examining six European countries, Soysal (1994) shows how the organizational configurations of states and their loci of authority generate different incorporation regimes. States can be corporatist, liberal, statist, or fragmental vis-à-vis immigrants. Such configurations and attitudes shape the type of mobilization employed by immigrants to influence state policies and practices. Thus in some countries immigrants might group together in a high-level umbrella group, whereas in others they will need to mobilize through grassroot efforts.

The importance of institutional constraints in shaping immigrant participation is best highlighted through cross-national comparative research. The effects of institutional constraints also go beyond politics. Reitz (1998), for example, has made an argument similar to Soysal's, but he focuses on immigrants' economic participation: institutional systems have direct effects on immigrants' economic outcomes. Looking at the US, Canada, and Australia, Reitz notes that immigrants from the same country of origin do more poorly in the US than in the other two countries, despite the fact that these immigrants usually have higher education levels than their compatriots who go elsewhere. Reitz explains this difference by arguing that labour markets, educational systems, social welfare structures, and immigration policy have differential impacts on immigrants' participation in the labour market.

Institutional arrangements also have an effect on social citizenship. Although research on the welfare state has generally been more interested in issues of class, Banting (1999) points out that states can respond in different ways when faced with a multicultural society. A welfare state might incorporate immigrants with few changes to the prevailing regime and consensus underlying social policy. Second, economically vulnerable groups in the cultural majority might support welfare provisions, but attempt to shut out immigrants both from entering the country and from receiving social benefits. Third, welfare states confronted by ethnic diversity might encounter a fragmentation in the support for social programs, fueling a neo-liberal attack on such programs. Banting suggests that although one might expect the historically homogeneous nation-states of continental Europe to suffer most from consensus fragmentation, it is in fact those countries used to accepting immigrants that are following the neo-liberal path. Factors such as union strength in Europe or prior racial divisions in the US affect the type of social citizenship offered to immigrants.

*Transnational Citizenship*
Focus on the participatory activities of immigrants also helps to identify the limits of linking citizenship to membership in one particular nation-state. In

the last decade, researchers have increasingly highlighted the extent to which "migrants, through their life ways and daily practices, reconfigure space so that their lives are lived simultaneously within two or more nation-states" (Basch, Glick Schiller, & Szanton-Blanc, 1994, p. 28). Consequently, some argue that transnationalism—"occupations and activities that require regular and sustained social contacts over time across national borders for their implementation" (Portes, Guarnizo, & Landolt, 1999, p. 219)—challenges traditional conceptions of citizenship. Although the extent to which the majority of immigrants live transnational lives remains unclear, it is evident that technological advances in communication and transportation, as well as economic globalization, are changing the way people participate both locally and globally (Glick Schiller, Basch, & Szanton-Blanc, 1992; Portes, Guarnizo, & Landolt, 1999).

We have already considered the argument for postnational citizenship as it relates to rights (Jacobson, 1996; Soysal, 1994). Transnationalism similarly challenges traditional conceptions of citizenship by expanding participation boundaries beyond the nation-state to include new social spaces. Dominican immigrants in New York City provide substantial monetary resources to political parties in the Dominican Republic, and these New York residents also sometimes influence the voting behavior of their relatives at home (Itzigsohn, Cabral, Hermánez-Medina, & Vázquez, 1999). Should immigrants confine their political participation to one nation-state? From the point of view of the state, Schuck (1998) argues that low-level cross-national political participation is not problematic for citizenship and might even help extend liberal democracy in the world (Portes, 1999). However, Schuck (1998) draws the line at letting naturalized US citizens engage in high-level homeland political activity, implying that immigrants must have a primary loyalty. Others argue that nationally-delimited citizenship is anachronistic in a transnational world (Basch et al., 1994).

On the other side of the citizenship equation, there is debate as to whether transnational participation is helpful for the immigrants themselves. Often the approach has been in line with Portes (1999), who argues that participation in multiple localities can aid immigrants and their children integrate into their new country of residence. Thus, "participation in transnational political activities can empower immigrants and invest them with a sense of purpose and self-worth that otherwise would be absent" (p. 471). General participation in the home country might also help minority immigrant children combat downward assimilatory pressures (Portes, 1999). Less optimistic, Jones-Correa (1998a) worries that the focus on transnational space, at the expense of citizenship in the host country, marginalizes immigrants if they are left between two nations. He argues that "the problem with this perspective is that it doesn't take politics seriously" as the resulting

unbound transnational citizenship would be "partial, insubstantial, and insecure" (pp. 197, 199).

Some of the difference between these positions is a matter of emphasis rather than deep-seated theoretical and empirical disagreement. Jones-Correa (1998a) supports dual citizenship as a means of enabling full political citizenship in the receiving country without entailing a loss of identity with the sending country. Portes (1999) promotes transnational participation in the sending country as a means to integrate newcomers in the receiving country. More empirical research is needed on participation and the exercise of citizenship in different localities to distinguish to what extent transnationalism aids or hurts immigrant incorporation, helps or hinders the home country, and strengthens or undermines the host society. Such effects might differ depending on the country of origin, country of reception, and the characteristics of individual immigrants. For example, Jones-Correa (1998b) demonstrates that participation strategies are different for immigrant Latino women as compared with Latino men. Women see their lives grounded to a greater degree in the US, where they are working and raising their families, and thus they participate in local associations and groups. In contrast, men who have suffered downward economic mobility because of migration to the US are more apt to participate in homeland politics as a means of keeping status. It is possible that participation differences also exist across class and racial lines.

*Conclusion*

To the extent that human rights, multicultural identities, and transnational participation reflect and create new socio-political communities, new types of citizenship might be evolving. Traditional citizenship ideals that focus on membership in the nation-state are being undermined across the various dimensions of citizenship. Immigrants' participation in their home country, in other international fora, and in global economic and cultural networks creates new participatory spaces that transcend the nation-state. Rights previously linked to state membership now increasingly are granted based on personhood irrespective of citizenship. In terms of identity, changes in the participation and rights dimensions of citizenship concurrently challenge traditional notions of national community. If common enjoyment of rights is to be the basis of shared identity—as liberals might suggest—then the decoupling of rights with territorial membership undermines territorial identities. A disassociation also occurs within the communitarian paradigm, but for different reasons: if participation is the basis of common identity, but participation is becoming transnational, then identities must also perforce become transnational, no longer overlapping with the nation-state.

Has the link between citizenship and membership in a nation-state been

decisively broken? No. Although strongly challenged by myriad forces, the nation-state remains critically linked to citizenship in a number of key areas. This can be seen clearly in the most basic dimension of citizenship, legal status. Only states—and in a limited sense some special supranational bodies such as the European Union—accord legal citizenship with the full power of law behind it. When an immigrant seeks naturalization and a state accords citizenship, the direct link between the individual and nation-state is reinforced. This link is above all legal and political. Although many rights are being disassociated from citizenship, political rights remain the most strongly bound with legal citizenship. The exercise of political rights in turn reinforces the link between the individual and the nation-state, because many of the political spaces where individuals participate are delimited by the geo-political boundaries of the nation-state. If one believes that a national community and identity can be created through the shared possession and use of political rights, the possibility exists of a multicultural citizenship within current nation-states. Citizenship thus continues to link individuals and the nation-state, although this relationship is increasingly under siege. We might expect new forms of membership other than citizenship to arise in the future.

Given the breadth of issues raised by both the legal reality of citizenship and its power as an analytical concept, the growth in this field is not surprising, nor should we expect interest to wane. Future research will need to be grounded in the empirical realities of immigrants' lives and be theoretically innovative in order to capture new global transformations. Because of the dynamism of citizenship in today's world, an analytical approach that considers both the actions of individual immigrants and the structuring activities of states is critical. I suggest that the lens of participation is one method of investigating this interaction because it spans two key parts of the citizenship equation: the individual migrant and the socio-political community that grants membership.

## Notes

1   Jerome Black and Yasemin Soysal helped generate a number of ideas developed here. I would also like to thank two anonymous reviewers from this journal for their comments and suggestions.

2   One could study citizenship substantively, asking how citizenship is held and enjoyed by diverse racial groups or sexes, or alternatively it could be studied as a temporal process, as Marshall (1964) theorized with his progression of civic, political, and social rights.

3   Thus the difference between a visitor and an immigrant is usually defined in temporal terms.

4   It is worth noting that in the US, a previous period of intense public agonizing about the meaning of American citizenship arose at the same time massive waves of new immigrants were lapping American shores (Higham 1988).

5   The situation for women has varied widely in different countries over time. On one hand, naturalization was often easy. For example, in the US prior to the Cable Act of 1922, most foreign-born women who were married to an American citizen (native-born or naturalized) automatically became a citizen as well. The flip side to this "easy" naturalization, however, was that women had no independent control over their citizenship status. Indeed, under

the 1907 Expatriation Act, an American woman who married a foreigner *lost* her citizenship, even if she was American-born (Bredbenner, 1998). This occurred irrespective of the fact that her husband's country might not grant her citizenship, rendering the woman *de facto* stateless.

[6] In Canada, for example, legislation was introduced in 1999 to tighten residency require-ments. Public pressure forced the elimination of certain other planned provisions including stricter language requirements.

[7] For example, Bernard (1936) and Neice (1978) rely heavily on simple cross-tabulations. Some researchers in the late 1970s and early 1980s began using Ordinary Least Squared (OLS) linear regression, but as Evans (1988) has noted, OLS is an inappropriate strategy when the dependent variable is dichotomous (being a naturalized citizen or not). Logit models are preferable.

[8] Both Evans (1988) and Yang (1994) make the important distinction that the positive relationship between English-language ability and propensity to naturalize only holds for those whose first language is not English.

[9] As Kymlicka and Norman (1994) point out regarding the general field of citizenship, scholars have been more apt to debate and suggest concrete policies concerning the rights attendant with citizenship than the obligations that follow. This characterization is also true in the case of immigration and citizenship, hence the focus here on rights rather than responsibilities. The obligations of citizenship are mostly discussed with regard to the issue of dual citizenship, such as the conflicts that could arise if immigrants are called upon to fight for two different countries (Hammar, 1989).

[10] Feminist theorists have criticized Marshall's model for reflecting only the experiences of men. Empirically, work such as that of Skocpol (1992) demonstrates that in the US women were given social benefits based on their role as mothers before they gained suffrage rights and before most men had any social rights.

[11] On August 22, 1996 President Clinton signed into law the Personal Responsibility and Work Opportunity Reconciliation Act (the "Welfare Reform Act"). Sweeping changes were made to the distribution of public benefits for all residents of the US, both citizens and non-citizens. The changes for non-citizen immigrants were the most dramatic: as of August 22, 1997 most non-citizens would be denied Supplemental Security Income (SSI) and food stamps, while states could decide to refuse them Medicaid and welfare as well. In July 1997, the Budget Agreement restored SSI to those residing in the US on August 22, 1996, and in 1998 a similar change was made for the food stamp program. Benefits were not restored for legal immigrants entering the country after August 22, 1996 except in certain special cases.

[12] European countries that allow non-citizens limited voting rights include Sweden, Norway, and the Netherlands; other countries offer limited rights to people of certain nationalities, such as to Commonwealth and Irish citizens in Great Britain. Prior to World War I, a number of US states gave voting rights to non-citizens who had declared their intention to natural-ize (Raskin, 1993; Rosburg, 1977), while British citizens were allowed to vote in Canadian elections prior to 1977.

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# Appendix

| Country | Naturalization Requirements, mid-1980s* | Naturalization Requirements, January 1, 2000** |
|---|---|---|
| Canada | · 3 year residency requirement<br>· fee about $30US<br>· only oral ability in French or English<br>· must show knowledge of Canadian history, government and geography<br>· no serious criminal record<br>· must swear an oath of allegiance<br>· children of immigrants born on Canadian soil are automatically Canadian citizens<br>· dual citizenship allowed | · 3 year residence requirement<br>· fee is $200CND (about $140US)<br>· only oral ability in French or English<br>· must show knowledge of Canadian history, government and geography<br>· no serious criminal record<br>· must swear an oath of allegiance<br>· children of immigrants born on Canadian soil are automatically Canadian citizens<br>· dual citizenship allowed |
| France | · 5 year residency requirement<br>· fee approx. $80US; fee can be waived in cases of low income<br>· oral ability in French; no written requirement<br>· no other knowledge requirements<br>· show assimilation into the French community, including a lack of a serious criminal record<br>· must swear loyalty to France<br>· children of immigrants born on French soil gain citizenship at majority if they lived in France at least 5 years and have no criminal record | · 5 years residency requirement<br>· fee is up to 3000FF (about $450US), depending on income and can be waived<br>· must have 'sufficient understanding' of French<br>· no other knowledge requirements<br>· show assimilation into French community, have good morals, and lack a serious criminal record<br>· must swear loyalty to France<br>· children of immigrants born on French soil gain citizenship at majority if they lived in France at least 5 years and have no criminal record |
| Germany | · 10 year residency requirement<br>· fee about 75% of monthly income<br>· "mastery" of oral and written German<br>· must have knowledge of and state loyalty to Germany's free democratic order<br>· must own one's accommodations and be able to maintain one's family<br>· prove "irreproachable conduct" beyond a lack of a criminal record<br>· children of immigrants born on German soil have no right to citizenship | · 8 year residence requirement<br>· fee is 500DM (about $250US)<br>· "adequate command" of German<br>· must have knowledge of and state loyalty to Germany's free democratic order<br>· must be able to support oneself without welfare benefits or unemployment assistance<br>· no criminal record or have been engaged in activities hostile to the German constitution<br>· children of immigrants born on German soil are automatically German citizenship if the parents resided in Germany 8 years; must opt for German citizenship formally by age 23<br>· no dual citizenship |
| United States | · 5 year residency requirement<br>· fee is $50US<br>· must show oral and written English ability<br>· must show knowledge of US history & gov't<br>· must have no serious criminal record, and demonstrate "good moral character"<br>· must swear an oath of allegiance<br>· children of immigrants born on American soil are automatically US citizens<br>· those naturalized may not have dual citizenship | · 5 year residence requirement<br>· fee is $225US<br>· must show oral and written English ability<br>· must show knowledge of US history & gov't<br>· must have no serious criminal record, and demonstrate "good moral character"<br>· must swear an oath of allegiance<br>· children of immigrants born on American soil are automatically US citizens<br>· those naturalized may not have dual citizenship |

* *Sources*: Brubaker (1989: 126-127), de Rham [France and Germany] (1990: 162-174), and North (1985) [Canada]. US dollar amounts are approximate, based on April 1987 exchange rates.
** *Sources*: Government documents. US dollar amounts are rounded, using January 2000 exchange rates.