

# **Understanding Membership in a World of Global Migration: (How) Does Citizenship Matter?**

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## **ABSTRACT:**

This article synthesizes the literature on citizenship and immigration to evaluate the heft of citizenship and theorize why it matters. We examine why citizenship laws vary cross-nationally and why some immigrants acquire citizenship while others do not. We consider how citizenship influences rights, identities and participation and the mechanisms by which citizenship could influence lives. We consider frameworks, such as cultural and performative citizenship, that de-center legal status and the nation-state. Ultimately, we argue for a claims-making approach to citizenship, one that is relational, includes actors outside the individual/state dyad and views claims as rights, legitimate membership, identity and participation.

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In January 2014, the Speaker of the U.S. House of Representatives, John Boehner, hinted that Republicans might work with President Barack Obama to legalize undocumented immigrants. But, he suggested, legal residency could come without a path to citizenship. Some advocacy groups rejected any proposal barring naturalization. Others were open to negotiation, believing that the benefits of legalization outweighed the disadvantages of permanent noncitizenship. As legal theorist Peter Spiro puts it, “The real prize is legal residency, not citizenship” (2008: 159). In parallel, denationalization—the withdrawal of citizenship—is experiencing an up-tick, albeit small. The United Kingdom now strips British citizenship from dual citizens if the government feels it is warranted for the ‘public good.’ In 2013, the High Court of the Dominican Republic retroactively applied a change in birthright citizenship law to 1929, denationalizing large numbers of Haitian-origin residents born in the Dominican Republic.<sup>1</sup> What effect does denying access to citizenship or stripping birthright citizenship have for immigrants, their descendants and the societies in which they live?

Citizenship may make little practical difference in the life circumstance of residents in poor or nondemocratic countries with weak governmental systems, limited resources and political indifference to rights. In Western nations, states have more capacity to link citizenship to benefits. However, the formal set of rights, duties and assistance restricted to citizens, as compared to legal residents, appears small, while responsibilities such as paying taxes and obeying the law hold equally for citizens and noncitizens. Acquiring citizenship can come with costs. Naturalization usually involves a fee, bureaucratic paperwork, and tests of language, civic knowledge or social fit. It may entail identity shifts and giving up real or imagined ties to the homeland. Is it worth it? In the 1990s, scholars noted an extension of rights, irrespective of citizenship, in many wealthy democracies. Some worried that the trend devalued citizenship (Schuck 1998); others celebrated universal personhood norms and human rights institutionalized in international or regional bodies such as the European Court of Justice (Soysal 1994; Jacobson 1996) or extended via global diffusion processes, including to Japan (Gurowitz 1999). We know that undocumented or precarious legal status affects immigrants and their families. In this article we ask whether citizenship matters for immigrants, compared to holding secure legal residence, and we place this question in a broader survey of the literature on citizenship and immigration.

We define citizenship as a form of membership in a political and geographic community. This means that citizenship is a specific legal status that signals a relationship between an individual and a

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<sup>1</sup> In 2014, a presidential decree made it possible for many to reclaim Dominican citizenship, but the administrative process is formidable, effectively rendering many stateless. The UK government has not released comprehensive data on denationalization, but one report puts the number at 27 people between 2010 and 2014. <http://statewatch.org/news/2016/may/uk-ind-terr-david-anderson-QC-citizenship-and-statelessness.pdf>.

sovereign state. In the first section of the article, we synthesize debates that ask why countries vary in their citizenship laws and why, given the laws on the books, some immigrants acquire citizenship while others do not. We note that much of this research examines immigrants in (Western) Europe, North America and Oceania. An important avenue for future research is the comparison of citizenship regimes across “Western” and “non-Western” states. This would force analysts to consider how democratic institutions, historical legacies, civil society mobilization, and notions of sovereignty, self-determination or equality shape the law on the books across regime types. Comparing and contrasting who gets citizenship in different countries could also illuminate when and how citizenship is seen in instrumental terms, or when it is seen as about identity and community, as a mark of privilege, or as a defense against exclusion, either political or social. Rather than just “Does citizenship matter?” expanding research beyond Western nations raises the question of which citizenships matter and under what conditions.

We build on these ideas in the second section, where we consider *how* citizenship might matter. We consider the methodological challenges of studying citizenship effects and then first conceptualize citizenship as rights, participation and identity. The gaps between legal status, on one hand, and rights, participation and identity, on the other, lead some scholars to explore notions of cultural, flexible, every-day, performative and semi-citizenship, which we discuss in the final section. In these approaches, disadvantaged noncitizens can claim citizenship through everyday acts or, for wealthy migrants, through consumption. Alternatively, scholars suggest that inequalities rooted in class, gender, ethno-racial background or other sources of marginalization render formal citizenship irrelevant. At best citizenship is a nice ideal, but of little substantive help to the disadvantaged. Or, more perniciously, it undermines the ability of those in structurally vulnerable positions, irrespective of citizenship, to make common cause toward change.

Throughout, we theorize the possible mechanisms by which citizenship might matter and we survey the empirical social science research on the consequences of holding citizenship for legally resident immigrants and their families. We find evidence that holding citizenship can increase political and civic engagement, socio-economic inclusion, identification, and social integration, but effects appear modest in the aggregate. Importantly, citizenship’s significance varies in patterned ways, appearing to matter more in Western countries for migrants from less democratic and poorer nations, people who also tend to be ethno-racial and religious minorities. Moving forward, researchers must investigate not just whether citizenship matters, but for whom, in what contexts, when, and *why*.

We end by arguing for the value of a claims-making approach to citizenship. Our view of claims-making keeps front-and-center the saliency of citizenship as a legal and political status, but moves

researchers' focus beyond the question of how rights align with citizenship. A claims-making approach incorporates appeals to law, but also an orientation to participation, drawing attention to migrants' agency. Because claims-making is relational, not just between an individual and the state, it draws attention to other individuals and institutions in a polity, from the local to the national, and to those outside a state's borders. It also incorporates attention to recognition: when do states, institutions and individuals accept immigrants' claims to equal membership? Claims-making brings together the instrumental, performative, symbolic and discursive facets of citizenship, raising the question: What, if anything, changes when claims are made from a position of citizenship?

### **CITIZENSHIP AS LEGAL STATUS: CONCEPTUALIZATION, SCALE, AND ACQUISITION**

To conceptualize citizenship, scholars must recognize the contemporary division of the world's territory and population into sovereign states. From the realism strand of international relations, citizenship matters in a Hobbesian world of potential violence. By controlling the legitimate use of force, the state provides "membership in that human association that trumps all others through providing elementary security and protection" (Joppke 2010: 3). Hannah Arendt's observations on the plight of German Jews, stripped of their citizenship under Nazism, remain an important caution. Without citizenship, people lose the very "right to have rights," that is, "their plight is not that they are not equal before the law, but that no law exists for them" (Arendt 1962: 295-6). In 2016, the United Nations High Commissioner for Refugees estimated that at least 10 million people around the world were stateless.<sup>2</sup>

International deference to sovereignty means that states are integral to theorizing: they allocate citizenship status through their control of political-legal borders that delineate territory and the people on it. This is the case even when the ideal of protection and security is not realized, as when governments enact violence on their citizens, or stand by as one group of citizens attacks another. Susan Coutin (2013) argues, in analyzing membership "in the breach," that human rights abuses perpetuated in El Salvador during the 1980-1992 civil war effectively constituted Salvadoran migrants as stateless persons. However, since technically they held Salvadoran citizenship, migrants' *de jure* citizenship provided an opening for receiving states to send border-crossers back to their country of citizenship.

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<sup>2</sup> See UNHCR, 'Ending Statelessness', online <http://www.unhcr.org/pages/49c3646c15e.html>. People can find themselves stateless when countries change nationality laws, when states collapse and are re-formed with new borders, or when they cross borders and both origin and destination countries deny citizenship. People also can be born stateless if a parent's nationality cannot be passed on and their country of birth does not provide citizenship.

Acknowledging nation-states' centrality does not mean scholars should ignore sub-state or supra-state membership. Multiple political groupings and alternative geographies are relevant. Comparing and contrasting notions of urban, local, transnational, supranational and diasporic citizenship to a traditional state-centered view can highlight both a hollowing out of the nation-state as the locus of legal status, rights, participation, identity and belonging (if it ever was this), and also its continuing relevance when different geographies of membership collide.<sup>3</sup> For instance, European Union citizenship serves as the most advanced "supra"-national status available today, providing individuals with mobility, economic and social rights in EU member countries.<sup>4</sup> Yet accessing EU citizenship requires citizenship in a member state and, with the UK's Brexit vote, British nationals likely will be stripped of EU citizenship, even if this goes against their wishes.

Tensions across scales of analysis and political units can be seen in the border-spanning spaces of transnational fields, as well as in more localized, place-based approaches to citizenship. A hallmark of international migration, as a distinct field of study, lies in the consequences of crossing an international border; similar intra-state movements usually do not carry analogous legal and political repercussions. However, in countries such as the People's Republic of China, internal migration can be experienced akin to international migration since access to education, health care and other state-provided benefits is linked to the birthplace of one's ancestors through the *hukou* household registration system (Chan 2009). Even with reforms, the *hukou* system acts, in some ways, as a *de facto* passport restricting and regulating mobility and, for those who move irrespective, rendering them a sort of undocumented migrant (Chan 2013; Liang 2016). In India, despite a constitutional right to internal mobility, practice on the ground can echo the experiences of China's internal migrants (Abbas 2016; UNESCO 2013). Scholars of immigration and citizenship consequently need to be attentive to a range of migrations, especially since internal movements are more significant than international ones: an estimated 221 million people in China and 326 million in India are internal migrants (UNESCO 2013: 3-4), compared to only 244 million migrants between nations (UN 2016: 1). The fact that international migration is comparatively small, however, underscores how consequential state power and citizenship-based exclusions are in the 21<sup>st</sup> century.

### WHY DO COUNTRIES VARY IN EXTENDING CITIZENSHIP STATUS?

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<sup>3</sup> For a sense of the evolving dialogue on citizenship among political and social cultural geographers, see Painter and Philo (1995), Desforges, Jones and Woods (2005), Staeheli (2011) and Diener (2017).

<sup>4</sup> For recent reviews, see Maas (2017) and Strumia (2017). On overlapping "citizenship constellations," see Bauböck (2010).

A core focus of citizenship research has been documenting and understanding cross-national variation in states' laws and regulations. The complexity of national and international law has produced a voluminous scholarship detailing the pathways to formal status and analyzing the implications of the law for nations and individuals. For example, historians, legal scholars and students of politics study legislative debates, court cases and administrative decisions, in one or a few countries, to reveal how racial ideology produced ascriptive exclusions (Haney Lopez 2006; FitzGerald 2017; Smith 1997) or how cultural idioms of nationhood, rooted in particular political histories, shape citizenship law (Brubaker 1992). Social scientists have subsequently built typologies, categorizing countries and explaining variation or temporal change by referencing colonial histories, political revolution, state-building, democratic politics or the international diffusion of norms (FitzGerald and Cook-Martín 2014; Howard 2009; Janoski 2010; Kamal 2017; Shevel 2017; Weil 2001). Increasingly, some scholars assign numerical scores to citizenship laws, creating cross-national indices that measure relative openness or exclusion.<sup>5</sup> These provide dependent or independent variables in statistical regressions.

Thanks to this capacious literature, we know quite a bit about the laws and regulations determining citizenship as status, though more in Europe, the Americas and Oceania than in Asia and Africa.<sup>6</sup> The main citizenship pathways are through administrative or legal application (naturalization), based on birth on territory (*jus soli*), or via 'blood' descent from parents or even grandparents (*jus sanguinis*).<sup>7</sup> Of the three, most immigrants in Western nations access citizenship through naturalization. The process usually requires a period of residence, no (serious) criminal record, an administrative fee, and often a test to demonstrate knowledge of the country's language(s), government, history or social practices. In some cases, citizenship can be denied if an applicant receives public benefits or they have not renounced their prior citizenship. The naturalization of a family member can secure citizenship for others, often children and sometimes spouses. In the United States, since 2010, an average of 706,000 foreigners become U.S. citizens per year (Witsman and Baugh 2016: 2) and thousands of foreign-born children acquire "derivative" citizenship when their parents naturalize or they are adopted (NAS 2015: 162-63). On average, across 15 OECD countries studied, 61 percent of working-age immigrants (15-64 years old) with at least 10 years of residence held citizenship where they were living; the proportion

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<sup>5</sup> See Helbling (2016) for an overview.

<sup>6</sup> On Africa, see Manby (2016), providing information on citizenship law for 54 African countries. For a discussion of various Asian countries, within a discussion of "non-Western" citizenship, see Chung (2017).

<sup>7</sup> Citizenship can also be extended based on other specialized rules or cases, for example, through legislative or executive decree to a group of people, based on religious conversion or marriage, or as a result of military service. For the myriad regulations in Europe and the Americas, see the EUDO Citizenship Observatory, available at: <<http://eudo-citizenship.eu/>> (accessed 4 October 2016). It becomes the Global Citizenship Observatory in 2017, with the goal of extending its database to 193 countries.

varied from 35 percent in Switzerland to 89 percent in Canada (OECD 2011: 28). The significant variation is partly due to naturalization regulations (Dronkers and Vink 2012; Janoski 2010; Vink, Prokic-Breuer, and Dronkers 2013).<sup>8</sup>

For those born to noncitizen parents, *jus soli* offers an alternative path to formal citizenship. Automatic birthright citizenship is prevalent in the Western hemisphere from Canada through the Caribbean and Latin America (FitzGerald and Cook-Martín 2014). It is perhaps most famously embodied in the Fourteenth Amendment of the US Constitution. Passed to ensure the citizenship of black Americans following the Civil War, and upheld by the U.S. Supreme Court in 1898 to include the US-born children of Asian parents barred from naturalization, birthright citizenship is one of the most powerful mechanisms of formal legal inclusion in the United States.<sup>9</sup> Between 1980 and 2014, the Pew Hispanic Center (2016) estimates that approximately 6.8 million US citizen children were born to unauthorized residents in the United States. In contrast, no European country currently provides unconditional birthright citizenship and the rules governing access to *jus soli* citizenship vary widely.<sup>10</sup> In Africa, only three countries (Chad, Lesotho and Tanzania) have absolute *jus soli* provisions on the books (and evidence of gaps in practice, Manby 2016). Immigration scholars tend to focus on citizenship via naturalization, but Janoski (2016: 43-44; 2010) argues that a true nationality rate must include *jus soli* citizenship.<sup>11</sup> In theorizing the reasons for cross-national variation in the integration of the second generation, Alba (2005) identifies *jus soli* citizenship as a key determinant.

The transmission of citizenship status through kin or blood descent has been seen traditionally as an exclusionary practice. Brubaker (1992) argued that cultural idioms of ethnic nationhood in Germany closed off citizenship to immigrants by restricting citizenship largely to *jus sanguinis*. For many Asian countries, blood descent is the primary pathway to citizenship (Chung 2017). Early on, scholars mapped *jus soli* and *jus sanguinis* onto inclusive “civic” and exclusionary “ethnic” citizenships, respectively, but researchers subsequently critiqued the dichotomy, underscoring the mixture of laws

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<sup>8</sup> In comparison, naturalization is virtually impossible in many Middle Eastern countries, although it exists on the books. In the United Arab Emirates, one must be Muslim, Arab, an Arabic speaker, have lived in the territory for a minimum of thirty years, have no criminal record, be financially secure, and have “proper” academic qualifications in order to naturalize (Ali 2011: 599).

<sup>9</sup> The court decision was *U.S. v. Wong Kim Ark* (169 U.S. 649). The only exceptions to birthright citizenship are for the children of diplomats or parents serving in similar capacities.

<sup>10</sup> An unconditional *jus soli* citizenship provision written into the Irish Constitution as part of the peace process with Northern Ireland in 1998 was ended in 2004 when Irish voters overwhelmingly voted for (modest) restrictions.

<sup>11</sup> Janoski distinguishes “narrow” naturalization-only citizenship calculations from a “wide” estimate including *jus soli*. The Migration Integration Policy Index’s “nationality” score considers naturalization rules and birthright citizenship, as well as dual citizenship and security of status. In 2014, across 38 countries, MIPEX’s ‘access to nationality’ scores ranged from an exclusionary 17 (Latvia) to an inclusive 86 (Portugal), with a median score of 50 (Italy). See <http://www.mipex.eu/access-nationality>, last accessed 12 December 2016.

and arguing that static typologies miss change over time (Howard 2009; Joppke 2010; Koopmans, et al. 2005; Goodman 2014).<sup>12</sup> In countries formed from the collapse of multi-national states, *jus sanguinis* can establish a ‘right to return’ for people who migrated to other areas, as in the case of Latvian citizenship law following the collapse of the Soviet Union (Shevel 2017). The general distinction between more open or closed practices, or “thicker” and “thinner” conceptions of the nation, is nevertheless found in many citizenship categorizations. This is the case whether a researcher draws on a quantitative citizenship index (often expressed as a single ordinal or continuous variable) or a typology approach often used in case-oriented research (with the possibility of multiple, discrete dimensions).<sup>13</sup>

To understand states’ relative openness or closure in citizenship law, researchers underscore both *longue durée* historical processes and more proximate factors. Various scholars argue that the European colonizing states and Anglo-settler countries have more open citizenship than non-colonial European states due to the political and military necessities engendered in controlling empires and forging civic and political solidarity out of colonization (Howard 2009; Janoski 2010; Weil 2001). But by changing the comparative metric to include all the Americas, FitzGerald and Cook-Martín (2014) argue that the Anglo-settler countries of Canada and the United States enacted stronger exclusion of nonwhite immigrants than other countries because of the early spread of mass democracy combined with epistemological communities of scientific racism.

Additional comparisons with post-colonial, successor, or non-Western states may further nuance arguments built on the experiences of North America and Western Europe. Various scholars argue, following World War II, that the international diffusion of equality norms has expanded citizenship access—even among authoritarian countries in Latin America or post-Soviet successor states—as have domestic pressures to live up to liberal ideals in Western democracies (FitzGerald and Cook-Martín 2014; Joppke 2010; Shevel 2017). However, observers note an exclusionary trend among some African and Middle Eastern states, challenging a simple global diffusion account (Manby 2016; Joppke 2017). While many post-colonial states embraced inclusive territorial citizenship upon independence to solidify claims over land and facilitate nation-building out of diverse populations,

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<sup>12</sup> Some researchers have noted an expansionary side to *jus sanguinis* for multiple nationality. The children of immigrants born in *jus soli* citizenship countries are often dual citizens through their parents, and some people using European ancestors three or more generations back to access EU citizenship (Harpaz 2015; Cook-Martín 2014), as in Argentinians’ efforts to identify Italian grandparents or Jewish Americans demonstrating ties to Sephardic Jews expelled from Spain over 500 years ago.

<sup>13</sup> From the perspective of normative political theory, both *jus soli* and *jus sanguinis* citizenship are “ascriptive,” that is, based on arbitrary rules assigning membership at birth, rather than the consent notion of membership inherent in naturalization. All birthright citizenship is thus arguably a source of “quasi-feudal” inequality between people around the globe who have no choice over their citizenship status (Carens 2013; Shachar 2009).

subsequent fears over borders and migration—fed by populism or the desire to restrict the pool of people who could claim state resources—has made demonstrating descent from a country’s “founding” residents, or tribal and ethnic ties, increasingly important (Joppke 2017; Manby 2016; Sadiq 2017). Shevel (2017) argues that drafting citizenship law in new states is fundamentally different from the experiences of West European and North American countries. Citizenship law must establish independent sovereignty in a short period, in a context of potentially destabilizing dual citizen populations within and outside the state.

Researchers focused on proximate causes of change in Western citizenship law underscore the role of electoral politics: parties on the left tend to favor inclusive citizenship; those on the right call for more stringent language and knowledge tests, longer residency requirements or higher fees for naturalization, and less generous *jus soli* (Howard 2009; Janoski 2010; Goodman 2014). A few researchers find suggestive evidence for reinforcing feedback loops: countries with more inclusive citizenship and higher proportions of immigrants may find it harder to take a restrictive turn with a growing immigrant-origin electorate (Koopmans, Michalowski and Waibel 2012). However, others see democratic, majoritarian politics as inherently exclusionary, with equality norms or international and supranational institutions the main checks against populist desires for “thicker” nation-state membership (Hampshire 2013). With populist narratives on prominent display in the 2016 US Presidential and European electoral contests, future scholarship must tease apart the relative importance of domestic politics, historical legacies, normative ideals, and institutional constraints.

Importantly, research on citizenship law and legal status is predicated on a state’s administrative capacity or desire to certify people as citizens. As Sadiq notes, the sharp distinction between legal citizens and noncitizens “can only be maintained... by developed or authoritarian states with sophisticated surveillance capabilities” (2008: 5). While holding a passport is an essential part of international travel today, passports are a political and social construction (Torpey 2000); one can view citizenship documents in a similar way. Some people are effectively rendered stateless when a junior official is unwilling or unable to generate a birth certificate or similar documents, or when state officials are absent in war-torn or rural areas, experiences that occur in Africa (Manby 2016) and Latin America, as highlighted by campaigns to end *de facto* statelessness for Mexican-born nationals who lack a birth certificate. Alternatively, in some Asian countries, unauthorized immigrants can access citizenship through an accumulation of local then national documents (authentic or fraudulent) that “prove” citizenship, without any naturalization process (Sadiq 2008). With the increasing use of high-tech, bio-coded identity documents as part of escalating surveillance in the wake of global terrorist attacks, the importance of documenting citizenship will surely intensify. Future research must engage

in comparison across a broad range of political regimes to better understand the law on the books and its application, even in an apparently straightforward area such as documenting legal status.<sup>14</sup>

### WHO BECOMES A CITIZEN, AND WHY?

Another longstanding research question asks what determines whether an immigrant applies for citizenship and successfully acquires it. Laws determining status provide one answer. Vink and colleagues estimate that moving from a country of restrictive naturalization to one with liberal regulations—roughly the equivalent of moving from Hungary to Sweden—doubles the probability of citizenship from about 40 to 80 percent for a migrant from a less developed country, all else equal (Vink, Prokic-Breuer, and Dronkers 2013: 13). Beyond laws, social scientists focus on individual decision-making and immigrants' personal characteristics, a micro-oriented approach distinct from the frameworks on citizenship laws, which tend to center on institutional, norm-based, cultural or party politics approaches. Researchers usually find higher probabilities of naturalization among those who migrate at younger ages, are married to citizens, have more years of residence, better language skills, (somewhat) more education, and better socio-economic situations, as well as those who migrate from less democratic and poorer countries than the receiving nation.<sup>15</sup> The reasons for these relatively robust correlations are, however, up for debate.

### *Cost-Benefit Frameworks and Integration Approaches*

For many economists or those working within a rational choice framework, immigrants actively decide on citizenship as part of a largely atomized, cost/benefit analysis (e.g., Bevelander and de Voretz 2008; Yang 1994). Individuals hold different preferences and weigh whether the 'costs' of naturalization, both in the country of residence (e.g., the amount of fees) and the country of origin (e.g., prohibitions on dual citizenship), are compensated by greater gains, such as access to more social benefits, better employment, or facilitated travel. On the 'costs' side, cross-national research does suggest that citizenship levels are higher in places with fewer barriers to citizenship (Dronkers and Vink 2012; Janoski 2010). But when it comes to benefits, to our knowledge no comprehensive database exists beyond voting regulations. Thus, researchers cannot directly judge whether cross-national

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<sup>14</sup> See Isin and Nyers (2014) for a recent volume advancing "global" citizenship studies. In many cases, however, contributions remain within regional geographies, not explicitly comparing "Western" and "non-Western" cases.

<sup>15</sup> On citizenship acquisition in the United States, see for example Abascal (2017), Bueker (2006), and Logan, Oh, and Darrah (2012), in Europe, see Dronkers and Vink (2012), Graeber (2016), and Vink, Prokic-Breuer, and Dronkers (2013), and in South Korea, see Hwang (2015).

variation in benefits (or broader citizenship costs related to tax laws or military service) systematically drives decision-making. Preferences are revealed through the naturalization decision, and they are assumed to correlate with socio-demographic and individual-level characteristics that also influence the ease of naturalization. For example, those who migrate at younger ages may find it easier to pass language exams (lower cost) and anticipate a longer time horizon of benefits (more gain) than older immigrants, introducing a life course logic to naturalization (Peters, Vink and Schmeets 2016).

In-depth interviews with immigrants document some motivations in line with a utility-maximizing view of human action. Immigrants mention the desire to secure civil, political and legal rights, social benefits, economic opportunities, international mobility, or to sponsor family members (Aptekar 2015; Bloemraad 2006a; Brettell 2006; Freeman, Plascencia, Baker and Orozco 2002; Gilbertson and Singer 2003). However, interviews also suggest that human agency is broader than cost/benefit instrumentalism. Immigrants express diverse logics and emotions about citizenship, reporting that naturalization feels like the right thing to do, they feel ‘at home’ in their adopted country, and they identify as a national. One of the strongest predictors of citizenship acquisition, time spent in a country, likely captures diverse integration processes, so some scholars view naturalization as part of an incorporation trajectory, even “ritual declarations of commitments already established” (Evans 1988: 259; Aptekar 2015). A simple integration explanation can suffer, however, from ambiguity as to what “integration” entails, difficulty explaining the timing of citizenship, and, in some accounts, from a zero-sum orientation that assumes naturalization represents a rejection of the prior nationality. Naturalized citizens can proudly express political belonging in their adopted country and retain attachment to and identification with their homeland through cultural belonging (Brettell 2006).

#### *The Warmth of the Welcome and Threat Environments*

Other scholars reject the individualized rationality of cost/benefit frameworks by placing immigrants’ actions within the social relations of family, ethnic community, and diaspora, and focusing on politics, policy, institutions, and contexts of reception.<sup>16</sup> Bloemraad (2006b) argues that the benefits of naturalization are higher for would-be citizens in the United States than Canada, yet citizenship levels are higher in Canada because multicultural and integration policies provide instrumental and symbolic resources to build community-based organizations and encourage naturalization, what she calls a structured mobilization framework to citizenship. In a similar vein, at the sub-national level, researchers find higher naturalization in U.S. states where public opinion polls indicate more welcoming attitudes toward immigrants (Logan, Oh, and Darrah 2012; van Hook, Bean and Brown

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<sup>16</sup> Just moving the level of analysis from individual to family-based decision-making can help explain statistical trends that appear to counter cost-benefit analysis (Street 2013, 2014).

2006) or lower political participation barriers (Jones-Correa 2001), and in Swiss cantons with more inclusive membership views (Helbling 2008).

Conversely, exclusionary environments likely depress citizenship over time, even if legislative or social ‘threat’ might generate short-term increases in naturalization applications. Several U.S. studies indicate that in the immediate aftermath of anti-immigrant initiatives in the 1990s, naturalization rates increased among Latino (Cort 2012), elderly (Nam and Kim 2012), and non-white immigrants (Logan, Oh, and Darrah 2012). Immigrants increasingly viewed naturalization as a defense mechanism (Aptekar 2015; Gilbertson and Singer 2003; Massey and Pren 2012). However, when naturalization requirements became more difficult in the Netherlands, citizenship acquisition fell, especially among those from less developed, politically unstable countries (Peters, Vink and Schmeets 2016). In France, Carrillo (2015) finds that those who self-identify as Muslim and report feeling “otherized” are less likely to naturalize, especially if they live in a municipality with a significant extreme-right voting constituency. Hostile attitudes and a lack of local voting rights also appear to discourage citizenship in Germany (Kahanec and Tosun 2009). In short, citizenship acquisition is not just a matter of immigrants’ personal characteristics, but also the welcome (or rejection) provided by native-born populations, policy environments and the political system.

#### *Beyond Individual Determinants or Contexts of Reception: Networks, Organizations and Institutions*

Future research should pay greater attention to “meso-level” analysis: the social networks, community organizations, and other groups such as businesses, unions, religious groups, and political parties that sit between individual-level determinants of citizenship and structured contexts of reception. Just as interpersonal ties are critical to understanding migration, the concentration of naturalized co-ethnics in an area increases an immigrant’s odds of naturalization in the United States (Abascal 2017; Liang 1994; Logan, Oh and Darrah 2012). In Sweden, the Netherlands and Germany, noncitizens with naturalized immigrant partners are more likely to acquire citizenship (Helgertz and Bevelander 2016; Peters, Vink and Schmeets 2016; Street 2014). Social ties might provide information and citizenship assistance. When asked to elaborate their path to citizenship, immigrants in North America—especially those who face the highest barriers to naturalization—often tell of how a child, family member or local non-profit organization helped them study for the language or civics exam, and how a community social service provider, a refugee resettlement agency or a for-profit *notario* filled in paperwork (Bloemraad 2006a; Félix, González and Ramírez 2008; Plascencia 2012). Such civil society efforts might be more effective when done in partnership with government, as happens with refugee resettlement in the United States or some public/voluntary sector partnerships in Canada (Bloemraad

2006a).<sup>17</sup> Beyond information diffusion and assistance, Abascal (2017) also finds that concentration of naturalized co-ethnics appears linked to a greater identification as “American”. Given the link between citizenship and political engagement, the near silence on citizenship outreach by political parties is startling; it is unclear whether researchers have simply not looked into this, or whether parties are not trying to encourage citizenship (but see Jones-Correa 1998).

#### *Multiple Citizenships: Instrumentality and Identity*

Research on naturalization intersects with a parallel scholarship on dual citizenship. It is generally assumed that holding multiple nationalities is advantageous, multiplying access to territory and associated rights or benefits, especially for those from poorer, less democratic countries (Harpaz 2015). As Peter Spiro (2017) argues, explaining the rapid increase in tolerance (even promotion) of dual citizenship since World War II, prior drawbacks—such as compulsory military service in two countries—have virtually disappeared. Many non-Western countries no longer see emigrants’ naturalization as an affront to homeland nationalism or a potential ‘brain drain’, but rather as a mechanism to encourage remittances, investment and human capital transfers. States’ openness to dual citizenship can, however, be tempered by fears of irredentism. Post-Soviet states have gradually allowed dual citizenship, but new policies can come with conditions, such as Kyrgyzstan’s decision to only permit dual citizenship with non-contiguous countries (Shevel 2017).

When homelands permit dual citizenship, naturalization appears to increase among immigrants in the United States (Chiswick and Miller 2008; Gershon and Pantoja 2014; Jones-Correa 2001; Logan, Oh and Darrah 2012; Mazzolari 2009) and Europe (Vink, Prokic-Breuer and Dronkers 2013), perhaps by up to ten percentage points, though not all research finds such a relationship (Yang 1994; Helgertz and Bevelander 2016). The extension of quasi-citizenship might have an effect, too, as following the creation of the “Overseas Citizenship of India” status in 2005 (Naujoks 2012). Migrants active in business and with higher education appear more sensitive to dual citizenship laws (Bloemraad 2004; Mazzolari 2009), perhaps because they can best leverage the benefits of transnational activities.

#### *Citizenship, Privilege and Marginality*

The sensitivity of more privileged migrants to dual citizenship laws underscores how different constellations of background and experience can be reinforcing or cross-cutting. Those most likely to acquire citizenship are not the most disadvantaged. Studies of naturalization consistently find a skill and educational gradient to citizenship acquisition, one that may be curvilinear: the likelihood of

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<sup>17</sup> In the United States, refugees are one and a half times more likely to become citizens than eligible legal immigrants with similar socio-economic and demographic characteristics (Fix, Passel and Sucher 2003:6; Woodrow-Lafield, et al. 2004).

naturalization increases with education, but then decreases amongst the most highly educated (Aptekar 2014; Bueker 2006; Chiswick and Miller 2008; Pastor, et al. 2013). Global economic elites might not need citizenship, either for material advantage or social standing, even as scholars document marketization in countries' willingness to "sell" citizenship to ultra-rich investors (Schachar 2017).

At the same time, immigrants from non-Western nations are much more likely to acquire citizenship than immigrants from rich, Western democracies, net of socio-economic or demographic traits. The difference might be a function of greater visa-free travel opportunities and the security of a Western passport (Harpaz 2015). But it may also reflect less privileged social standing for non-Western immigrants in Western states. Financial or human "capital" matters for citizenship acquisition, but so too does national origin, whether as an indicator of the homeland's political and economic context, or a marker of particular ethnic, racial or religious origins. Early work on transnationalism explored dual citizenship as a self-affirmation strategy for nationals of developing countries who face downward mobility and racism in their country of residence (e.g., Basch, Glick Schiller and Szanton Blanc, 1994). Privileged migrants like a German national in Switzerland or a white Canadian in the United States might enjoy greater latitude to reject naturalization than non-Western immigrants who need to prove membership. As the populations of Western states become more diverse, future research can compare the experiences of North-to-North migrants from racial or religious minority backgrounds to white, Christian co-nationals to tease apart the privileges of formal Western citizenship status, socio-economic background, and ethno-racial or religious markers.

Paying attention to race, class and other status markers shifts our conceptual attention from citizenship as legal status to its social construction as privileged membership. A new frontier for understanding these dynamics lies in questions of denationalization. Some Western states have proposed legislation to strip the citizenship of dual nationals deemed a threat to national security, a tactic already legal in the United Kingdom. Those with just one citizenship—frequently white citizens with multiple generations in the country—cannot be denationalized under conventions on statelessness. In effect then, those at jeopardy for denationalization are often of immigrant and minority background, even if they were born in the country and their other citizenship was not sought out, but acquired through descent. As various scholars point out, denationalization not only undermines the notion that more citizenships are better, but it fundamentally challenges the norms of equality and basic protection inherent in liberal democratic citizenship, and does so in discriminatory ways (Macklin 2015; Gibney 2017).

## **EVALUATING WHETHER CITIZENSHIP MATTERS: METHODOLOGICAL CHALLENGES**

The research synthesized thus far draws on a wide methodological tool kit: analysis of historical archives, ethnography, statistical modeling of survey data and quantitative policy indices, and in-depth interviewing. These methods have run into problems, however, in evaluating whether citizenship has a discernable impact for legally resident immigrants. This is because the process of naturalization is doubly selective. The laws governing citizenship make it easier for some people to gain citizenship than others. Then, some foreign residents choose to apply; others do not. As Alex Street puts it, the danger for analysts is in attributing observed differences between immigrant-origin citizens and noncitizens to naturalization, “This risks mistaking the differences that make immigrants more or less likely to naturalize for the effects of citizenship status itself” (2017: 2).<sup>18</sup>

The “behavioral turn” in economics and interest in experiment-based causal inference in political science have produced innovative new strategies for evaluating the consequences of citizenship. In quasi-experimental work, Hainmueller, Hangartner and Pietrantuono (2014, 2015) use a dataset of would-be Swiss citizens whose naturalization was subject to vote by local citizens. They argue that those who barely won or barely lost the citizenship vote are practically identical, allowing them to pinpoint outcome differences back to citizenship acquisition. Other scholars leverage “external shocks” to law beyond individuals’ control. For example, in 2000, the German Citizenship and Nationality Law gave *jus soli* citizenship to some German-born children of immigrants, a sharp break from the noncitizenship of babies born before 2000. Such legislative shocks are theorized to work like a treatment in a random experiment, allowing researchers to identify the independent causal effect of citizenship, net all other individual determinants (Avitabile, Clots-Figueras and Masella 2013, 2014).

Attention to causal inference has provided real advances in our evidentiary knowledge, as we discuss below. However, we underscore that while experimental design can tell us *whether* citizenship appears to have some effect on outcomes, it cannot tell us *why* it does, requiring conversation across methodologies and disciplines.<sup>19</sup> Quasi-experiments also face problems if we understand citizenship as a larger political and social process. For example, even if the change in German law is an ‘external shock’ to the citizenship status of babies born around 2000, the fact that the German parliament debated and then voted a legislative change reflects broader social and political forces that may shape membership attitudes and behaviors of other actors in German society, from media to school teachers.

More broadly, then, experimental logic tends to ignore the social construction of the object of study. Establishing causality through experimentation assumes that receiving the ‘treatment’

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<sup>18</sup> A lack of good datasets is a further problem for quantitative analysis. Many population surveys lack data on birthplace, citizenship status and length of residence.

<sup>19</sup> Researchers can posit mechanisms and try to design quasi-experimental situations to test them, but we face significant practical and ethical limits; we cannot randomly strip some people of citizenship to see what happens.

(citizenship, in this case) does not affect anyone else who is treated nor the control group, and that it does not change the experimental context. In a drug trial, taking a pill for migraine headaches does not affect others trying the drug, or the group with the placebo pill. But opening birthright citizenship to thousands of new babies—a group diverse in ethno-religious origins—might change the notion of what German citizenship means. For some people, citizenship might become an empty membership label not reflecting true “Germanness”; for others, the diversification of who holds German nationality might broaden the membership category of ‘citizen’ to a more multicultural imagined community. Changing social or cultural notions of membership could then affect economic stratification or politics. In short, experimental logics are an important methodological tool as part of a broad set of strategies to understand not just whether citizenship matters, but for whom, in what contexts, when and why.<sup>20</sup>

### **WHY DOES CITIZENSHIP MATTER? RIGHTS, IDENTITY, AND PARTICIPATION**

Surprisingly few studies systematically interrogate whether and why citizenship affects immigrants and their children, or the societies that provide or withhold it. Citizenship is posited as normatively important in liberal, democratic states or functional for securing rights and benefits. The first argument restricts the study of citizenship to democratic states; the latter equates citizenship narrowly to ‘on the books’ benefits.

In surveying the empirical research, we theorize a variety of mechanisms by which citizenship could matter.<sup>21</sup> Without any claims to being exhausted, we suggest that citizenship provides *access* to opportunities, rights, and benefits; it connotes *legitimacy*; it leads to *mobilization* by other actors; it spurs personal *investment* or more rapid *socialization* in the economic, civic, or political life of the country; it *signals* to others particular skills, motivations, or time horizons; and it carries *social psychological effects* for social identity and collective solidarity. In discussing these mechanisms, we first consider customary facets of citizenship—rights, identity and participation—and then explore alternative conceptualizations.

We note at the outset that much of what we know from English-language academic work is predicated on research in West European and Anglo-settler immigration countries. We are unsure whether posited citizenship effects apply to non-Western contexts. Kamal Sadiq (2017) suggests that Western notions of citizenship can be applied to post-colonial contexts, but with greater attention to the role of social rights and welfare provision for constituting the citizenry. In trying to knit highly

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<sup>20</sup> Experimental logics also face the perennial question of external validity and generalizability to other contexts or other types of people not subject to the experiment.

<sup>21</sup> For more details on the empirical research, see Bloemraad (2017).

diverse populations together, state provision of resources becomes foundational to the citizenship project. In contrast, Erin Chung (2017) argues that Western citizenship is imagined as universal, democratic, and inclusive, ideals that do not necessarily translate elsewhere. Instead, drawing on examples from various Asian countries, she argues that citizenship in non-Western states prioritizes collective obligations towards the state over individual rights. Further, since collective networks and institutions are grounded in kinship, ethnic and religious ties, these affiliations structure a contingent rather than universal citizenship and hierarchical application of civil, social and political rights that cross-cut citizen/ noncitizen distinctions. Thus, it is an open question how citizenship is experienced differently in countries with colonial histories or not, or which were subject to European versus non-European imperial projects. Membership hierarchies from colonialism might remain, be re-ordered with independence, or be repudiated in the process of establishing sovereignty and self-determination.

#### CITIZENSHIP AS ACCESS TO RIGHTS, OPPORTUNITIES AND BENEFITS

At its most basic, citizenship provides access to a state's territory and protection against deportation. Permanent residents can be expelled from a country, even after decades of residence. From 2006 through 2015, 3.5 million noncitizens were "removed" from the United States.<sup>22</sup> Most were unauthorized migrants, but by one estimate, about ten percent or 87,844 people deported between 1996 and 2007 were legal permanent residents (Human Rights Watch 2009: 24). Deportation of "green card" holders, often for non-violent criminal offenses, is particularly high for some groups, reflecting broader racial inequalities in policing (Golash-Boza 2015). Deportation is deeply injurious. By providing a right to territory, citizenship also secures access to a particular labor market, social environment, legal system and political institutions.

A state's control over resources and those within its territory allows it to determine and enforce additional rights and benefits attached to citizenship. T.H. Marshall's (1950) history of the progressive extensions of civil, political and social rights in the United Kingdom is an influential conceptualization of citizenship as rights. But as critics note, there is no necessary link between holding citizenship status and access to rights, evident when Britain's colonial empire and women's experiences are interrogated. All current democracies restricted suffrage at one time by some combination of gender, property ownership, religion, ethno-racial background, indigeneity, education or literacy, mental competency,

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<sup>22</sup> U.S Immigration and Customs, 'ICE Enforcement and Removal Operations Report, Fiscal Year 2015', online <https://www.ice.gov/sites/default/files/documents/Report/2016/fy2015removalStats.pdf>, p. 11. Removals for FY 2014 and 2015 from this report; data for 2006-2013 from Table 33 of the U. S. Office of Immigration Statistics, 'Yearbook of Immigration Statistics, 2013', online <https://www.dhs.gov/publication/yearbook-immigration-statistics-2013-enforcement-actions>.

criminal record, and age. Conversely, most liberal democracies today accord basic civil and human rights to all people on their territory, regardless of citizenship, from due process rights in criminal proceedings to the provision of emergency health care. The imperfect match between citizenship status and rights has led to postnational arguments about the decoupling of rights from citizenship (Soysal 1994; Jacobson 1996), metaphors of citizenship as 'hard' on the border but 'soft' within liberal states (Bosniak 2006), or frameworks of "semi-citizenship" based on rights constellations applicable to those with or without citizenship status (Cohen 2009). Radically, in 2008, the new Ecuadorian constitution pronounced the equality of rights, duties and opportunities for all people irrespective of "migratory status," at home or abroad, and advocated universal citizenship and free mobility.<sup>23</sup>

Nevertheless, most countries today reserve the most expansive rights and benefits to citizens. This means that a primary mechanism by which citizenship matters for ordinary people operates when states regulate access to opportunities, benefits, rights or duties by citizenship. Consider political rights. In line with a postnational argument, the Migrant Integration Policy Index (MIPEX) found in 2014 that non-EU foreigners could vote in local elections in 21 of 38 democracies surveyed, and noncitizens could stand for local office in 14 of these countries.<sup>24</sup> However, for national elections, referenda or plebiscites, noncitizenship remains a widely-accepted exclusion, along with age. According to Beckman (2012), noncitizens enjoy "reasonable access" to national elections in only one country, New Zealand; additionally, Paraguay, Uruguay, Ecuador, Chile and Malawi only require a period of residence to vote nationally.<sup>25</sup> Since national governments usually control the terms by which noncitizens gain citizenship, this places noncitizens in a vulnerable position, even with local suffrage.

Beyond politics, citizenship can provide access to economic rights and benefits. In 2014, full access to public sector jobs was limited to nationals (or EU nationals) in 10 European countries. Another 13 countries had partial citizenship restrictions.<sup>26</sup> Such restrictions can limit employment and may channel noncitizens to private sector jobs with less security and fewer benefits. In the United States and Belgium, researchers find that new citizens gain access to more public sector, permanent, white collar, and union jobs, which helps accelerate wage growth (Corluy, Marx, and Verbist 2011;

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<sup>23</sup> An English language translation is available at <http://pdba.georgetown.edu/Constitutions/Ecuador/english08.html>

<sup>24</sup> See Migrant Integration Policy Index 2015, 'Political Participation', online <http://www.mipex.eu/political-participation>. European Union member states are required to provide EU citizens with the right to vote in local and European Parliament elections, but each country may establish its own rules for "third country" noncitizens and for national elections.

<sup>25</sup> In some countries, such as Portugal and the UK, reciprocal voting rights established by bilateral treaties or other arrangements grant national voting rights to specific noncitizens.

<sup>26</sup> See, 'Labour Market Mobility', Migrant Integration Policy Index, accessed 18 May 2016, <http://www.mipex.eu/labour-market-mobility>.

Bratsberg, Ragan and Nasir 2002). Access to high-paying professional fields, such as dentistry, medicine, and law, is also restricted to citizens in some countries. Once employed, noncitizen workers tend to have the same rights to union representation and labor protections in Western states as citizens, but noncitizens are excluded from parts of the social security system in 17 of the 38 countries surveyed by MIPEX, including Australia, New Zealand, the US, the UK, and many central European nations.<sup>27</sup> Differential access to social benefits, shaped by welfare state and immigrant incorporation regimes, can produce lower standards of living and more poverty for noncitizens (Morissens and Sainsbury 2005; Sainsbury 2012). Access to education does not usually distinguish between citizens and permanent residents, but eligibility for scholarships or financial aid can.

Conceptualizing citizenship as rights does not restrict us to ‘on the books’ mechanisms of access. Citizenship in the Western tradition embodies the normative ideal of equality, even if that ideal has been poorly achieved in most times and places. The moral claim of equality is powerful, such that holding citizenship might increase immigrant-origin residents’ legitimacy and standing in the eyes of others. Other social actors might feel stronger obligations to fellow citizens as an unwritten “right” of common citizenship. Thus, immigrant-origin citizens’ discursive ability to make claims in the name of equal citizenship—juxtaposed to the negative image of ‘second-class’ citizenship—may increase new citizens’ claims-making, and affect how others respond to them. Future scholarship should examine whether the rights claims of individuals or groups resonate differently among decision-makers and the public based on the citizenship status or nationality of the claimant.

#### CITIZENSHIP AS IDENTITY: SOCIAL-PSYCHOLOGICAL MECHANISMS AND COLLECTIVE SOLIDARITY

States, as political bodies that control territory, do not necessarily form affective communities of belonging. Yet modern citizenship usually also connotes a national identity. Someone is ‘American,’ not just a U.S. citizen, and there is a ‘Polish’ or ‘Vietnamese’ nation to which one belongs. Such a nation is not primordial, but rather an “imagined community,” shaped by the spread of print capitalism, mass education, cultural depictions, and experiences of war, among other factors (Anderson 1983; Gellner 1983; Weber 1976). Scholars debate how ‘thick’ or ‘thin’ national identities need to be to sustain collective imaginaries and, it is posited, sufficient solidarity that citizens will agree to be taxed, serve in the military, support redistributive policies, and trust in common institutions (Miller 1995).

Citizenship may consequently matter as a social identity for the individual, in inter-personal or inter-group relations, or for the political community at-large. At the individual level, few researchers

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<sup>27</sup> Labor rights on the books do not necessarily translate into rights in practice, so citizenship might still mitigate exploitation even when noncitizen workers have formal right (Preibisch and Otero 2014).

systematically examine immigrants' national identity by citizenship status, instead analyzing identity by generation or nativity, or by ethno-racial background. In US studies, identifying as "American" is highest in the 3<sup>rd</sup> and later generation, a bit lower for the 1.5 and second generation, and lowest for adult immigrants. Generation is obviously correlated with citizenship, but so too are socialization experiences, leaving open the question of whether formal, legal designation as a citizen influences identity. Field research paints an ambiguous picture: some noncitizens—including undocumented migrants—identify as American, some naturalized citizens distance themselves from American identity, and many naturalized Americans embrace it (e.g., Aptekar 2015; Bloemraad 2013; Brettell 2006; Gilbertson and Singer 2003). In France, 79% of naturalized immigrants report "feeling French," less than the majority population (98%), but significantly more than the 52% of noncitizens who feel French despite lacking citizenship status (Escafré-Dublet and Simon 2014: 72). States often want citizenship to come with social identity: dignitaries at citizenship ceremonies highlight common identities, at a local or national level, in ritualized moments deeply moving for some immigrants (Aptekar 2012, 2015; Byrne 2012; Coutin 2003; Fassin and Mazouz 2007). Social psychologists have linked robust social identification to health and well-being (Jetten, Haslam and Alexander 2012) and voting (Scuzzarello 2015), so becoming a citizen could increase well-being and political participation.<sup>28</sup>

To be clear, we are not saying that citizenship provides a magic wand erasing experiences of exclusion based on ethno-racial background, religion, class or other attributes. In the United States, third and later generation Asian or Latino Americans can be treated as "forever foreigners" or undocumented based on phenotype or last name (e.g., Tuan 1998; Jimenez 2009), and some survey data suggest that those reporting discrimination are less likely to identify as American (Golash-Boza 2006). Despite color-blind French republicanism, second generation 'visible minority' citizens are much more likely to say they are not seen as French by others compared to the French-born children of European immigrants (Escafré-Dublet and Simon 2014: 76). The locally-born children and grandchildren of immigrants in Japan and South Korea also face questions about being a 'true' national, despite phenotype similarities, because notions of blood descent exclude them from the imagined national community (Chung 2010). Citizenship status might provide access to formal rights, but does it matter for inter-personal or inter-group relations? It is hard, in social interactions, to signal citizenship in the same way that accent or clothing can mark social identity.

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<sup>28</sup> Adopting a 'national' identity does not necessarily entail giving up homeland or other identities. Indeed, dual identification to national and heritage identities is correlated with higher well-being (Berry 2005) and greater voting (Scuzzarello 2015).

We hypothesize that holding citizenship nonetheless can provide immigrants with identity claims that are more difficult to delegitimize than those of noncitizen permanent residents. Not only is something owed to citizens based on equality norms, but also due to membership in a community of reciprocal obligation and sentiment. Identity effects might be stronger among immigrants from poorer and less democratic countries as they are more likely to be stigmatized. In a British survey, only 41% of “white” immigrants of European or North American origin reported a British identity (another 5% report a dual identity), compared to 62% of foreign-born Bangladeshi (5% dual) and 64% of foreign-born black Caribbeans (6% dual) (Manning and Roy 2010). Differences lie partly in citizenship take-up: those from poorer countries are more likely to acquire British citizenship, and citizenship has a statistically significant correlation with British identity in the immigrant generation.<sup>29</sup> The resonance and content of identity claims might vary across countries and depend on the way citizenship was achieved or its meaning for those in the majority (Ditlmann, et al. 2011; Bloemraad 2013; Scuzzarello 2015).<sup>30</sup> We return to ideas of claims-making below.

States’ generosity or reluctance to extend citizenship may have broader, aggregate effects on social cohesion. A vast scholarship examines whether diversity undermines social cohesion, with inconclusive results.<sup>31</sup> To our knowledge, this research has not examined whether heterogeneity effects are exacerbated or mitigated depending on the prevalence of citizenship. Survey data document less political and social tolerance for minorities in countries with exclusionary citizenship policy, and more immigrant-inclusive definitions of the national community in countries with *jus soli* citizenship and higher levels of social spending. The causal relationship between policy and attitudes is hard to determine, but some argue that policy can influence social identity and legitimacy norms (Pehrson, Vignoles, and Brown 2009; Weldon 2006; Wright 2011). Collectively, shared citizenship may produce societies with a greater sense of cohesion or solidarity, feelings potentially useful in supporting social policy and positive social relations or, in a darker scenario, supporting foreign aggression.<sup>32</sup>

#### CITIZENSHIP AS PARTICIPATION: MOBILIZATION, SOCIALIZATION, INVESTMENT AND SIGNALING MECHANISMS

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<sup>29</sup> On France, see Maxwell and Bleich (2014), showing that Muslims are less likely to report feeling French than others, but citizenship (as well as socio-economic integration and French language fluency) mitigate the difference.

<sup>30</sup> In U.S. citizenship ceremonies, the naturalized citizen is sometimes portrayed as particularly virtuous for having chosen citizenship, more than those born into citizenship (Aptekar 2012), but in French ceremonies, those who much ‘achieve’ citizenship through application are sometimes portrayed as not quite equal to those who receive citizenship automatically (Fassin and Mazouz 2007).

<sup>31</sup> See, for example, the review by van der Meer and Tolsma (2014).

<sup>32</sup> For T. H. Marshall (1950), the inherent inequalities of market economies could be reconciled to democratic equality via citizenship since civil, political and social rights brought benefits to the individual and fostered collective solidarity.

Finally, within the Western tradition, citizenship also connotes participation in a collective system of governance. From this perspective, citizenship was born in the Athenian city-state, where political engagement was the highest form of activity, albeit one carried out in a public sphere that excluded women, slaves, and newcomers. The notion of citizenship as collective self-governance appears to exclude from analysis, however, non-democratic or authoritarian countries as well as people not active in formal political systems, whether due to choice or formal exclusion. We first consider citizenship as participation in the political and civic sphere, and then expand the idea of communal engagement to participation in the economic and family spheres. In article's final section, we move more broadly to performative and cultural citizenship accounts.

### *Participation in Politics and the Civic Sphere*

We have already seen that citizenship can be more tightly tied to political than social or civil rights, though civic exclusions are mostly confined to electoral politics. Beyond access, citizenship may lead to more political and civic engagement because the naturalization process socializes immigrants to participate more and fosters mobilization by others. Political parties, unions and advocacy groups may be more likely to invite citizens to participate in elections, demonstrations, and strikes than noncitizens, even when no laws prevent noncitizens' engagement, due to increased legitimacy in having an equal say in governance. Greater participation could in turn improve immigrant-origin residents' well-being through social psychological mechanisms of collective empowerment and communal identification (Stevenson, et al. 2015a), as well as through actual policy change.

The limited empirical evidence suggests that naturalized immigrants are more politically active than noncitizen immigrants, and that foreign-born citizens participate somewhat less or about the same as native-born citizens, with variation by country of origin and country of residence (e.g., Kesler and Demireva 2011; Martinez 2005; Morales and Giugni 2011; Street 2017). The influence of citizenship appears to go beyond formal access. Examining municipal and provincial elections in Sweden, in which noncitizens can vote, Bevelander and Pendakur (2011) report that acquiring citizenship increases the probability of casting a ballot. Just and Andersen (2012) find, across 19 European democracies, that citizenship increases noninstitutionalized political and civic engagement—open to noncitizens—especially among immigrants from nondemocratic countries. Existing research is by no means conclusive, however. We confront the causal inference problems discussed earlier: naturalized immigrants may just have a greater interest in politics than those who do not naturalize, driving both citizenship acquisition and engagement. Comparing immigrants before and after they acquire German citizenship, Street (2017) finds no evidence of a naturalization effect on political

interest or partisanship.<sup>33</sup> In contrast, comparing those who narrowly achieve Swiss citizenship to those who do not, Hainmueller, Hangartner and Pietrantuono (2017) find that naturalization increases political knowledge and sense of political efficacy, though not non-electoral political engagement.

Some, but not all, of this research finds larger citizenship effects for immigrants from less democratic countries. If accurate, socialization processes might be at play: migrants from nondemocratic countries may have fewer civic skills, less political knowledge, and weaker political trust or participation norms than those from democratic countries, but they may develop these norms and skills during the naturalization process, along with reassurance that participation is a right, even responsibility, of citizenship (Just and Anderson 2012). Indeed, Goodman and Wright (2015) find somewhat higher absolute levels of political interest and self-confidence among immigrants in countries with greater language and civic integration demands.<sup>34</sup> Alternatively, however, naturalization might not change immigrants as much as the actions of those around them. If political actors are less likely to reach out and engage noncitizens, than citizenship could lead to increased participation due to mobilization dynamics (Jones-Correa 1998; Bloemraad 2006).

#### *Economic Participation and Citizenship “Premiums”*

If we extend the idea of participation to the economic sphere, citizenship may provide an economic “premium” for naturalized immigrants, improving income, employment and occupational prestige. The wage premium of citizenship, holding other personal attributes constant, is estimated at about one to five percent in countries such as Canada, Denmark, Germany, Norway, the Netherlands, Sweden and the United States (e.g., Bratsberg, et al. 2002; DeVoretz and Pivnenko 2005; Helgertz, Bevelander and Tegunimataka 2014; Liebig and Von Haaren 2011; Picot and Hou 2011; Steinhardt 2012). Economic outcomes might improve if the citizenship process comes with language requirements, forcing noncitizens to invest in language learning. Such an investment mechanism is advanced by some politicians who favor strict language tests for citizenship, but a lone study on the question finds no link between language requirements and economic outcomes (Goodman and Wright 2015). More plausibly, the sense of security and permanent settlement that comes with citizenship might prompt immigrants to invest in human, financial and social capital accumulation through job and

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<sup>33</sup> Street does find a significant increase in partisanship for the children born in Germany as noncitizens who subsequently naturalize as children or young adults.

<sup>34</sup> The analysis includes integration requirements for permanent residency as well as citizenship, so the independent effect of the latter is not clear.

language training or homeownership.<sup>35</sup> Examining 14 European countries, Corrigan (2015) argues that the conditionality of legal status at the country level affects non-EU immigrants' occupational attainment through skills investment and greater employment selectivity; immigrants hold higher status jobs in places where legal residency is more secure and citizenship attainment easier.

If citizenship improves one's economic situation, it appears to do so especially for immigrants from poorer countries. If the premium was just about legal access to certain jobs, we shouldn't see national origin variation. If we do, it raises the possibility that citizenship might mitigate discrimination by employers or lenders by signaling national membership, greater integration or long-term residence. Research in various countries has tested bias in employment and housing by submitting identical applications and varying names that connote particular ethnic, racial or religious background (see OECD 2013 for a review), but to our knowledge, only one similar field experiment has been done testing citizenship effects, finding in Germany that discrimination in job call-backs for applicants with Turkish sounding names is halved when the applicant holds citizenship (Pietrantuono 2016). Irrespective of actual skills or motivation, citizens might be judged as having better language ability, more knowledge of social norms, or more motivation. Employers or teachers also may view immigrants who acquired citizenship as long-term employees or students, not just temporary residents. Signaling effects might be stronger for migrants from non-OECD countries if they are stigmatized or their human capital, such as educational credentials or work experience, is questioned more.

#### *Citizenship Externalities and the Family*

Citizenship effects might also extend to other family members, including those lacking citizenship. Parents' illegality has detrimental effects on children in the United States, even when children hold U.S. citizenship (e.g., Bean, et al. 2015; Dreby 2012). In a parallel way, a family member's citizenship might carry positive externalities. Exploiting the exogenous shock of extending birthright citizenship in Germany to certain babies born after 2000, Avitabile and colleagues (2013) find that having a child granted German citizenship produced a significant increase in parents' probability of socializing with Germans and reading German newspapers (but no statistically significant difference in using the German language) even though parents' status did not change. Children granted birthright citizenship were also less likely to be obese, had fewer behavioral problems and greater well-being, as reported by parents (Avitabile, et al. 2014). The authors adopt economist Gary Becker's "quality-quantity" model of fertility to explain these outcomes: parents with citizen off-spring had fewer

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<sup>35</sup> The presumption is that investment occurs in the new country of citizenship. Alternatively, DeVoretz and Irastorza hypothesize (2017) that immigrants from less developed countries might invest in citizenship to facilitate return migration or a move to a third country, as among European Union member states.

children, which supposedly let parents invest more in citizen children. Alternatively, a framework attentive to the structural determinants of health suggests that citizenship might reduce stress, encourage better outreach by health professionals, improve socio-economic conditions and so forth. Riosmena and colleagues (2015) advance this argument to understand the protective role of U.S. citizenship in mitigating immigrant women's declining health over time. Future research needs to be attentive to the repercussions of naturalization or birthright citizenship for noncitizen family members.

### **ADVANCING THE FIELD: FROM CULTURAL AND PERFORMATIVE CITIZENSHIP TO CLAIMS-MAKING**

Thus far, we speculate that if citizenship carries real effects in ordinary people's lives, the impact can occur through diverse mechanisms. Citizenship may matter because it provides elementary protection and a guaranteed place to live in a world divided into sovereign states. Instrumentally, this means that some citizenships are more valuable than others due to disparity in the resources and social systems that states provide. In states with the administrative apparatus to enforce it, citizenship can provide access to opportunities, rights and benefits. Particularly in democracies, but arguably in most contemporary states, the ideal of equal citizenship connotes, in addition, a degree of legitimacy and social standing irrespective of citizenship's material benefits or actionable rights. Holding citizenship might thus generate shared social identity between foreign-born and native-born citizens and signal something about foreign-born compatriots' attachments, skills, motivations or time horizons. For some immigrants, acquiring citizenship may spur personal investment or more rapid socialization in the economic, civic or political life of the country, and it might carry social psychological effects for well-being. To the extent that some immigrants are stigmatized, the impact of citizenship may differ by ethno-racial background, religious affiliation, socio-economic position or other attributes, perhaps mitigating inequalities, part of the Western ideal of citizenship. But given the ideal, experiences of discrimination might be felt more viscerally for minorities who hold citizenship. Alone or in combination, these citizenship mechanisms could create a stronger basis for foreign-born citizens' mobilization to collective action and feelings of solidarity compared to those who only hold legal permanent residence. There is some suggestive evidence consistent with these hypotheses. However, we underscore that empirical work on the impact of citizenship relative to permanent residence status is limited. We theorize these mechanisms to encourage future research.

Much of our discussion has emphasized the legal status of citizenship, either directly, or as a means to rights, identity and participation, and through them, to legitimacy, standing, social inclusion and mobilization. A range of scholarship across the social sciences and humanities raises alternative approaches, questioning the salience of legal status for understanding citizenship. These alternatives

often distinguish “formal” citizenship (status and rights) from “informal” and every-day practices that can transcend status categories and reconstitute the substantive meaning of citizenship. This can occur in quotidian social interactions and identity negotiations that become a micro-politics of daily life (Isin and Turner 2002; Isin 2008). It can also occur across geographies, from neighborhood and urban to re-scaled transnational or diasporic citizenships. As a place-based practice, researchers pay attention to social interaction performed in spaces with particular historical, social and economic arrangements (Desforges et al. 2005; Stevenson, et al. 2015). Immigrants, even without legal residence, might become citizens of Berlin or San Francisco through their participation in schools, workplaces and neighborhoods. Their presence can even become citizenship-like with official documents such as city ID cards. As Isin puts it, “Rather than asking ‘who *is* the citizen?’ the question becomes ‘what *makes* the citizen?’” (2009: 383).

The theoretical and methodological tools that scholars employ to understand experiential or performative citizenship vary across and within disciplines. Cautioning that the social psychology of citizenship is in its infancy, Stevenson and colleagues (2015) highlight insights from social identity theory, community psychology and its attention to collective engagement and empowerment, and constructivist psychology approaches. Some anthropologists instead employ the idea of ‘cultural citizenship.’ Citizenship is ‘cultural’ to the extent that researchers attend to cultural discourses embedded in social position and institutional practices, as well as to identities, interactional practices and symbolic performances of belonging. One variant emphasizes agency to secure social inclusion. Marginalized groups—including citizens of racial minority backgrounds and undocumented immigrants—engage in contestation and strategic action to claim cultural citizenship or “the right to be different (in terms of race, ethnicity, or native language) with respect to the norms of the dominant national community, without compromising one’s right to belong, in the sense of participating in the nation-state’s democratic processes” (Rosaldo and Flores 1997: 57; see also Rosaldo 1994). For Kathleen Coll (2010), an undocumented immigrant might speak out at a public meeting and claim communal, cultural citizenship based on her role as a parent or worker. An alternative cultural citizenship focuses on governmentality and capitalism, with embedded class and racial hierarchies limiting agency. Aihwa Ong argues, “Cultural citizenship is a dual process of self-making and being-made within webs of power linked to the nation-state and civil society” (1996: 738). Ong (1999) thus interprets wealthy Chinese migrants’ practices of ‘flexible’ citizenship that use wealth, philanthropy

and consumption to signal inclusion to be both a reaction to race-based exclusions and practices that perpetuate class hierarchies (see also Park 2005).<sup>36</sup>

Another variant, performative citizenship, examines the claiming and contesting of rights by paying attention to citizenship acts in a bottom-up process (Isin and Nielsen 2008; Isin 2009; Zivi 2012). As a performative act, citizenship can apply to noncitizens and citizens, and to people living in democratic or nondemocratic countries (Isin 2017). In this view, the public actions—cultural, political and social—of undocumented youth blur the figurative and legal dividing line between “illegal” immigrants and U.S. citizens. Here and in other versions, we again find diverse – even divergent – theoretical orientations, from post-structuralism as articulated by Derrida or Foucault and Freudian psychoanalysis to symbolic interactionism or the feminist and queer theory of Judith Butler.

Some scholars might find the resultant concept of citizenship stretched so thin that its utility disappears. The esoteric theorizing in some writing on cultural or performative citizenship can also render it illegible to many inside and outside academia. This is a challenge for researchers who have prosaic concerns, as illustrated by the political events we evoked in our introduction. If a legislative compromise extends legal status but prohibit naturalization, how will the lives of the newly legalized differ from those able to acquire citizenship? How do the lives of immigrants’ children differ if they acquire citizenship automatically, as a matter of birthright, or if they are designated a ‘foreigner,’ despite being born in the country and enjoying many rights similar to citizens? Still, conceptualizations that emphasize immigrants’ agency and practices of citizenship, broadly conceived, creatively expand how researchers can study citizenship. They provide alternative accounts of what constitutes—or could constitute—citizenship.

Drawing on both traditional and newer conceptualizations of citizenship, we suggest an approach to citizenship as claims-making, one in which the relative importance of holding the formal legal status of a citizen remains a key question. Thus, in face of “current debates about whether citizenship is a status or practice” (Isin 2009: 369), we argue it is both. Immigration scholars cannot ignore legal status since it is essential to the very constitution of our analytical focus—the migrant—who is rendered a ‘foreigner’ by the power of law and the state. We do not presume legal citizenship status necessarily matters, however. History and contemporary social science clearly demonstrate that people with purportedly equal citizenship earn unequal incomes, are differentially charged with crimes, and live longer or shorter lives based on such things as their gender, ethno-racial background and socio-economic position. Conversely, in some times and places, certain noncitizens enjoy more

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<sup>36</sup> Others argue that “flexible citizenship” is overstated for the ‘satellite kids’ of wealthy Asian families since they build social relations and acculturate into a more settled citizenship (Waters 2003).

rights, benefits or advantages than certain citizens. Nevertheless, based on existing research, we posit that making claims is easier for people when they hold citizenship. This is not to say that noncitizens cannot or will not make claims—clearly they do, including those without papers—but rather that due to dynamics such as access, mobilization and social identity, they will be more likely to do so. We similarly posit that, all else equal, people have a greater chance of advancing their political, economic, social and cultural projects as citizens because their chances of being recognized as deserving increase due to the legitimacy, signaling and standing of citizenship. One day, citizenship might be entirely eroded. We are not convinced that time has come.

A claims-making approach has a number of features. It requires researchers to put individuals in relation to other actors. A key actor is the state, since citizenship incorporates the notion of membership in a political community that is territorially grounded. Citizenship thus makes it possible for individuals, families or groups of people to make claims on the state as citizens, be it through appeals to rights, by invoking membership in an imagined community, by underscoring participation in collective endeavors, or engaging in citizenship acts and discursive appeals. But citizenship as claims-making can go beyond the individual/state dyad to implicate other interlocutors: fellow citizens, collective actors (such as political parties or unions) and institutions, ranging from schools to social service agencies, courts to hospitals. The status of citizen is analytically important, not just as a legal status to access rights, but also as a membership concept of identity, legitimacy, and participation appealed to during interactions with others. An open question for research is how one signals citizenship.

A flip side of claims-making is recognition. A claims-making approach draws attention to what actors—immigrants, states, and others—articulate as the content of citizenship, explicitly or implicitly. Allocating differential rights to citizens compared to noncitizens is a manifestation of normative judgements of deservingness. Governments are making claims about the legitimacy and standing of different human beings when they use citizenship as a criterion. But citizenship claims do not need to be only about rights; they can be about symbolic recognition, access to opportunities or other demands. We thus wonder, on what basis does citizenship privilege certain claims and how do immigrants use or challenge such political discourses or cultural tropes? We hypothesize that when citizenship carries normative legitimacy as a community of equals and linked fate, as in democratic states, making claims from a position of citizenship can change the nature, valence or outcome of interactions with others, whether they work for state agencies, live in one's neighborhood, employ us, or participate in civil society. For better or worse, laying claim to citizenship provides social standing, legitimacy and a signal of inclusion, at least in theory. Alternatively, citizenship might matter more in new states, or countries

with restrictive citizenship laws that exclude immigrants, or in rentier states where citizenship is tightly tied to economic benefits and social rights. These speculations require researchers to expand the range of countries studied to confirm or problematize findings built on Western countries' experience.

We acknowledge that there are elements of this project that some will view as reinforcing existing structures of disadvantage. Trying to understand the salience of citizenship necessarily constructs an image (often negative) of the noncitizen or the foreigner. A human rights or personhood discourse emphasizes, in contrast, common humanity. We do not seek to reinforce binaries, but rather to understand whether, when and why an appeal to citizenship status might matter in some places rather than others or for some people more than others. We also readily acknowledge that citizenship status and claims do not ensure substantive citizenship, defined as equality of rights, participation (including possibly outcomes) and belonging. The citizenship status of those who do not fit into the ideal model of a "true" citizen can be questioned, perhaps to such a degree that citizenship does not matter. As Isin notes, "Citizenship can be both domination and empowerment separately or simultaneously" (2009: 369). But when placed in a position of disadvantage, do citizenship claims provide more leverage than alternative appeals? Given current political events, in which narratives that reject immigrants' membership pushed some UK voters' to leave the European Union and some Americans to support Donald Trump, we desperately need a better understanding of the social meaning, political consequences and economic repercussion of citizenship in a world of global migration.

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