Acknowledgments

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Introduction

What flower is traditionally worn by British people on Remembrance Day? Where do you register the birth of a child in the Netherlands? When can a political party be banned in Germany? These are examples of real questions that have appeared in national integration exams in the respective Western European states. They reflect a range in test content, including cultural knowledge, practical information on day-to-day activity, and an understanding of the rule of law. More than mere trivia, being able to correctly answer these questions in the national language determines whether an immigrant can acquire citizenship or long-term residence. Therefore, preparing for an exam plays a key role in immigrant integration, while successfully passing it is decisive for obtaining political membership.

Assessing language proficiency and knowledge of the country and its values are relatively new strategies for promoting integration and regulating membership inclusion in Western Europe. They represent the cornerstone of a new policy known as “civic integration.” This concept is the embodiment of a belief that active and productive participation by immigrants in society and the labor market is possible through their acquiring a set of “citizen-like,” or civic, skills that include speaking the language of the host country, having knowledge of the country’s history, culture, and rules, and understanding and following the liberal-democratic values that underscore their new home. In other words, civic integration policies uniquely express the idea that successful incorporation into a host society rests not only on employment (economic integration) and civic engagement (political integration), but also on individual commitment to characteristics typifying national citizenship, i.e., full membership in society. Civic integration policy promotes these characteristics through the use of new assessment tools such as integration tests, courses, and contracts. These instruments serve as gatekeepers, where the path of transitioning from an outsider to an insider is marked by these mandatory integration requirements as a condition for obtaining various legal statuses.
Introduction

This points to a paradoxical dimension of civic integration: immigrants – sometimes both new and old – are required to obtain these skills of autonomy. Immigrants enter into a metaphorical (or, in some cases, physical) contract with the state, whereby the former has an obligation to integrate, while the latter sets standards and defines avenues for doing so. Without completion of civic requirements, immigrants are ineligible to obtain citizenship, permanent and long-term residence permits, and in some cases, entry and permits for family reunification. This dimension – promoting positive skills through sanctions – has imbued civic integration with a particularly negative connotation. Scholars have referred to these practices as an instance of “repressive liberalism,” later modified to “illicit liberalization,” as well as the anchor of a “restrictive backlash” of obligations against the expansion of rights and liberalization typifying citizenship policy change in the 1990s. Setting aside normative implications, however, the tethering of new integration requirements to different legal stages indisputably secures a new, closer role for the state in promoting and, indeed, ensuring integration. Policymakers play a key role in defining the content of (a) new identity, and civil servants ensure adherence to these new norms where assessment is largely facilitated by state institutions or contracted proxies.

Yet civic integration is significant not merely because new requirements impact the immigrant experience of settling in a new society, in which the state plays a closer role, but ultimately because these requirements redefine what it is that immigrants are asked to join. By highlighting shared rules of society and concepts of belonging, states are articulating (some for the very first time) concrete and, in principle, accessible definitions of what it means to “be British” or “Dutch” or “German.” In this, civic integration represents the latest iteration of the ongoing project of nation-building. I label this most recent articulation of belonging as “state identity.” In contrast to national identity, forged in the heyday of nationalism to justify distinct statehood projects by underlining “sameness” in groups, state identity promotes “togetherness” among different groups, where individuals can join the larger national community through initiative and commitment and not resemblance to inherited or ascriptive attributes. This new functional identity is reflected in the content of integration courses and exams, where immigrants are asked to obtain an understanding of political institutions and learn values of political liberalism (from the German test: “What is the function of regular elections in a democracy?”), as well as acquire information for everyday life, such as how to contact a doctor, obtain a prescription, enroll a child at school, volunteer, etc., prominent in both the Dutch and British exams. History is emphasized for the purposes of understanding the origins of political institutions, practices, and contemporary culture, not to establish religious or ethnic criteria for community. Though there are clear overlaps in content of national and state identity, showing that these two identities are not mutually exclusive and are concomitant in time, state identity creates contemporary possibilities of membership for immigrants where national identity does not.

The difference between state identity and national identity is particularly visible in the orientation and audience of civic integration requirements. Specifically, we see the promotion of civic qua citizen-like values and skills to decidedly non-citizen stages. The term civic integration is the English translation of the Dutch inburgering, which appears at the heart of the primogenitary 1998 Wet Inburgering Nieuwkomers (subsequently referred to as WIN), translated as The Newcomers Civic Integration Act. Inburgering is a verbal noun, fusing the concept of citizen (burger) with the process of performance of becoming (indicated by the suffix -ing). Marie-Claire Foblets succinctly interprets inburgering as “citizensization.”

But, importantly, this is distinct from naturalization, the process whereby eligible immigrants become citizens. “Citizensization” is the promotion of participation-enabling skills among a variety of non-citizen populations, from persons seeking citizenship to immigrants seeking entry and permanent residence. Achieving civic integration milestones, therefore, establishes state identity among persons both in and outside of citizenship.

While it is not unique for traditional countries of immigration to forge identity with the outsider in mind, the introduction of language, society knowledge, and value requirements has been among the most visible if not the most significant of the policy changes for addressing the aggregate impact of mass immigration to Western Europe. States as diverse as Germany, the UK, Denmark, France, the Netherlands, Austria, Greece, Italy, and Luxembourg, are all strong practitioners of civic integration, through tests, courses, interviews, etc. in order to exhibit language skills and knowledge in exchange for legal status acquisition. In their adoption, we witness the fundamental transformation of the European nation-state from passive labor importer (in other words, a country that merely receives immigrants) into a country of immigration, where “the nation” is treated as a form of illiberal particularism and immigrant-related

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3 While, in principle, civic integration affords a civic identity, I adopt the term “state identity” to avoid conflation with the civic vs. ethnic paradigm of nationalism in drawing a contrast to national identity. Though there are overlaps (see Chapter 1), temporal differences require conceptual distinction as even national identity created out of civic nationalism (e.g., France) adopts civic integration strategies to define contemporary membership.


5 The United States, for example, has practiced assessment of language/literacy and civic knowledge for the better part of a century.
diversity – for better or worse – assists in and serves as the catalyst for defining criteria for national membership and belonging.

This book is not the first examination of civic integration in Western Europe; to describe immigration and citizenship scholars as preoccupied with civic integration would be an understatement. In political theory, there has never been more interest in reconciling multicultural realities with liberalism. Perhaps, as a result, examining the role of the state in managing ethnic diversity vis-à-vis civic integration has largely proceeded in normative or empirical assessment. Among descriptive work, there have been volumes dedicated to detailing, categorizing, and comparing new policies. Surprisingly, however, none have puzzled over the empirical diversity of civic integration policy design or have any presented systematic, comparative explanations for policy variation. In fact, in one account, Christian Joppke strangely dismisses this variety altogether, stating in the same breath that “despite obvious national variation in the scope and level of restrictiveness of civic integration policies across Europe, a focus on ‘obligation’ (and reverse-de-emphasis on ‘rights’) is a shared feature of all of them” and, therefore, “the notion of national models no longer makes sense, if it ever did.” As such, an overwhelming academic consensus has settled on identifying the empirical landscape as one of widespread and restrictive convergence, accounting for a uniform


Ibid.: 2.


Ibid.: 243; Böcker and Strik, “Language and knowledge tests for permanent resident rights: Help or hindrance for integration?”, 166.


policy (that is, the relative ease or difficulty with which immigrants obtain citizenship) as a politically consequential structure for the politics that seek to alter or reify it. Not only does citizenship give formal "institutional expression to the state’s prerogative of inclusion and exclusion," but it also leads state actors to different understandings of how to perceive and repair membership problems. In other words, new civic requirements in traditionally restrictive (exclusive) citizenship states necessarily address different challenges – and produce different effects – than new civic requirements in traditionally liberal (inclusive) citizenship states. Therefore, a mandatory civics test or language course that may be restrictive in one context could enable integration in another. This institutional setting then provides a meaningful context for a more traditional account of membership policy change that focuses on preferences of the party in power, where right parties pursue restriction and left parties pursue liberalization. My central argument is that civic integration policies are crafted as part of different policy strategies to address different problems of membership, defined by inherited citizenship policy and extant political preferences of the party in power that seeks to change or fortify these approaches. Existing citizenship policy – interchangeably referred to here as policy legacy or inherited policy – not only reflects formal opportunities for political inclusion and exclusion but also defines the parameters of the debate in which policy actors propose and implement change. The second condition – ideological orientation of government – recognizes that likelihood for continuity or change depends not merely on the context in which policymaking plays out, but also on the preferences of the policymakers.

To examine this more closely, I explain diversity in membership strategies based on the interaction of existing restrictive or liberal citizenship policy starting points and politics, which seek to change or maintain those initial policy positions. This dynamic approach builds upon existing insights on the various means by which politics produce citizenship change, noting the agenda-setting role played by far-right parties, policy gains through campaigns, coalition partnership, opposition pressure, etc., but integrates an institutional perspective to highlight the different contexts in which these politics play out. In states with restrictive (exclusive) citizenship, where opportunities to naturalize are already limited and rightist governments in power identify no interest to break this practice, membership requirements serve to continue and retrench existing citizenship postures. In this scenario, permanent residence may become a durable alternative membership status – a type of ancillary, demi-citizenship. On the other hand, in restrictive states where leftist governments are predicted to have a significant interest to liberalize, civic integration policies represent more contained, or limited, change, where government views are modulated to maintain electoral competitiveness or bargains are struck to stay in power in a restrictive policy environment. In sum, this negotiated procedure may soften initial restriction but not to the extent that liberal proponents hope. In both instances, where citizenship remains closed off, a strong focus of integration and immigration occur at both the stages of permanent residence and citizenship, thereby establishing a significant chain of conditionality to full legal incorporation.

In liberal (inclusive) citizenship regimes, however, states pursue fundamentally different objectives in adopting civic integration. Where left governments are not predicted to pursue restriction – and face no political pressure to do so – changes that introduce new membership requirements reify an existing liberal orientation, enriching citizenship by encouraging more participation and incentivizing naturalization of long-term residents. In other words, where citizenship is already accessible, the challenge of membership is primarily one of achieving incorporation and defining an accessible civic identity in multicultural states. Finally, liberal citizenship states in which governments on the right seek to pursue restriction may use integration requirements to constitute that new restriction, but like restrictive regimes with liberalizing governments, the intensity of change will be contained, resulting from self-modulation or negotiation. In both of these scenarios, costly alteration to the fundamental parameters of naturalization establishes instead equivalence between permanent residence and citizenship whereby statuses are, by and large, indistinguishable from one another.

The promotion of membership through civic integration is a discrete phenomenon, limited to advanced democratic systems in Europe and traditional immigrant receiving states (e.g., the United States, Canada, and Australia). However, limiting analysis to Western Europe provides sufficient variation to test convergence claims and other endogenous pressures. In testing existing theories for citizenship policy and providing important modifications to those predictions that take into account the unique nature of membership requirements, the comparative case studies included in the book demonstrate how similar policy instruments can yield different effects where they are bound by different institutional parameters. Thus, while civic integration is largely confined to Europe, this observation is generalizable to cases of citizenship change beyond the continent, and potentially to other policy areas, in that it illustrates the importance of context for assessing convergence claims, while highlighting the value-added of detailed, comparative case study analysis.

Finally, after identifying variation in civic integration policy as well as the factors that produce those outcomes, this book’s third major contribution is in providing important confirmatory evidence for the continued relevance of national citizenship in contemporary nation-states, against both national, supranational, and transnational predictions that say otherwise. If there is a common theme underlying these policies, it is that of states employing the
informal and identity-providing ties of membership to fortify citizenship in a new context of ethnic diversity and fiscal constriction. Moreover, this is achieved through the innovation of state identity, not the reinvigoration of national identity. In the end, new requirements do not change or signal a departure from national citizenship but anchor and strengthen it. Despite predictions that “distinct national models of dealing with immigrants are giving way to convergent politics of civic integration,” this book shows how European states are using new tools to address national membership problems, thereby perpetuating national differences in membership. If anything, new requirements show the truly adaptive and resilient nature of the nation-state in the twenty-first century. Large-scale immigration in the postwar period has disrupted the European myth of the homogenous nation-state, forcing Europeans to rethink what it means to be a member of the core group. Through the innovation of state identity, new civic requirements articulate clear definitions for belonging and lay out arbitrary steps for outsiders to become insiders in principle, if not always in practice, without fundamentally altering the parameters of what the state already possesses.

Methodologically, I approach these three objectives with a research design that uses a medium-N sample to identify patterns and variation in civic integration policy, but employ in-depth case studies and a series of paired comparisons to examine the interacting effects of citizenship policy starting points and politics. I include six case studies in total in order to provide typical, diverse, as well as influential cases of civic integration adoption. Cases are paired in order to illustrate the importance of condition interactions, where citizenship legacy can induce differently oriented governments to pursue similar membership policy design (Chapter 4), where differences in citizenship steer similarly oriented governments to policy divergence (Chapter 5), and where process of causal change can yield differences of outcome despite similarity of conditions (Chapter 6). I use a variety of evidence in these case studies to observe causal processes and elucidate mechanisms for how institutional starting points and politics yield different membership strategies, including primary legislation, government and non-governmental organization (NGO) reports, interviews, as well as the vast secondary literature on civic integration policies by area experts, which provides hefty descriptive content but little analysis. Each case study examines both policy output and outcomes (effects), in order to fully characterize civic integration policy strategy and variation across states.

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Joppke, “Transformation of immigrant integration in Western Europe: Civic integration and antidiscrimination policies in the Netherlands, France, and Germany,” 243. Klaver and Ode also argue that “countries with very different traditions with regard to immigration and integration issues have resorted to similar policies” in Klaver and Ode, Civic Integration and Modern Citizenship: The Netherlands in perspective, 4.

For more on techniques of case selection, see Jason Seawright and John Gerring, “Case selection techniques in case study research: A menu of qualitative and quantitative options,” Political Research Quarterly 61, no. 2 (2008), 297–98.

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The remainder of this introduction looks more closely at existing work on civic integration policies, identifying some problems that require attention and discussion before analysis can proceed. Finally, I present the organization of the book by summarizing individual chapters.

CHARTING A NEW COURSE FOR CIVIC INTEGRATION STUDIES AND ANALYSIS

The study of civic integration tells us much about existing membership problems in citizenship practices and concepts of belonging, and analysis of policy adoption sheds critical light on perceived deficiencies of existing citizenship approaches as well as how states adapt to new conditions to maintain control over nation-building. The importance of studying civic integration is reflected in the many articles, edited volumes, and policy reports comparing these new state practices. Yet while this burgeoning research has unearthed a bevy of important facts on policies, detailing specific nuances of each policy design from price to targeted population to test content, the singular focus on ideational convergence—and consequently, relegation of policy diversity to an afterthought or minor detail of the civic integration phenomenon—has yielded a series of problematic observations that have been concretized as prima facie claims. These biases create problems for concept validity, i.e., for defining what is a civic integration policy and what is not, which then creates problems for measurement and comparison. These problems require acknowledgment and discussion before analysis can proceed and include, but are not limited to: (1) interpretation of restriction; (2) a lack of acknowledged policy differentiation; and, (3) differences of interpretation over what civic integration requirements represent. I would argue that these problems largely proceed from the fact that existing work is almost entirely descriptive, identifying patterns and drawing conclusions without attempting comparative analysis of causes or outcomes. Or, what there is in terms of analysis is largely relegated to concerns of effects of civic integration on multiculturalism and other integration models, not citizenship and legal status.

I. Interpretation of restriction: The first problem is that because obligations are required by definition, they should be interpreted as synonymous with a restrictive change; that is, more requirements equal more barriers. Viewed
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from this theoretical vantage point, integration requirements have been interpreted as representing an "illiberal liberalism" that constitutes a "restrictive turn" or "backlash" against the vast liberalization of citizenship policies in the 1990s – policies that included the widening acceptance of dual citizenship and the lowering of residence duration. These perspectives all identify a primary role for far- and center-right parties in introducing this restriction. But these approaches are limiting because: (1) if any requirement is considered restrictive, then the bar of acceptable requirements the state can ask of a newcomer is essentially set at zero, which betrays the widely accepted notion of citizenship as an exchange of rights from the state for obligations by the citizen; (2) language proficiency and society knowledge tests can actually enable integration and produce inclusion, not exclusion; and (3) policies get introduced by a bevy of actors outside of the right. Overreliance on this blunt characterization tool diverts attention from what is happening on the ground.

II. Lack of acknowledged policy differentiation: The second problematic claim stems from taking ideational convergence as the starting point for analysis. Simply put, the belief of ideational convergence produces a type of empirical cherry picking that seeks out only similarities. The view of convergence is predicated on the idea that similar instruments produce similar outcomes, even going so far as to posit that they were adopted for similar macro-reasons. Change is seen as part of a larger, comprehensive strategy of major immigrant-receiving states for addressing the demographic shifts and diversity-related pressures of immigration. But if a mandatory membership strategy is a response to large-scale immigration, why do states make changes at the stage of citizenship if other requirements for naturalization make it so that only a tiny percentage of foreign residents will be able to obtain it? And, in countries where immigrants are more likely to obtain citizenship and have higher rates of naturalization over time, why do policy actors perceive membership problems at this time?


53 Guil, Groenendijk, and Carrera, eds., Illiberal Liberal States: Immigration, citizenship, and integration in the EU; Orgad, "Illiberal liberalism: Cultural restrictions on migration and access to citizenship in Europe."); Triadafilopoulos, "Illiberal means to liberal ends? Understanding recent immigrant integration policies in Europe."


The "idea" of civic integration is present across these states, manifested in a variety of tests, contracts, courses, and oaths, but there are visible differences both in how difficult requirements are and in how states arrange these requirements. Austria, Denmark, and Germany emphasize civic integration for immigrants seeking permanent residence, in that it is a significant, preceding barrier of admission with integration demands. Additional requirements then exist for citizenship, binding the immigrant to a formidable chain of conditionality. The Netherlands and the UK differ in exempting immigrants from integration for citizenship if they have completed the requirements for permanent residence (effectively removing the distinction between the two). Differences between state practices are also evident in the sequence of policy adoption. Assuming a greater role for policy learning over time, the order in which integration policies are adopted is even more telling. In terms of mandatory integration requirements, the UK and the Netherlands comprehensively focused on citizenship, in 2002 and 2000 respectively, before extending requirements to permanent residence, both in 2007. Austria and Germany are cases of a reverse trend, anchoring integration conditions in permanent residence in 2002 and 2003, before replacing weak integration conditions with robust testing for citizenship in 2006 and 2007 respectively. Denmark is the quintessential case of this latter strategy. An aggregate view of policy obfuscates these important differences; sequencing of mandatory integration clearly indicates populations given top priority.

III. Interpretation differences: The final problem seems surprising given the aforementioned ideational and policy consensus. While scholars agree and treat civic integration as the same phenomenon, i.e., as one set of policy ideas sweeping across European states, they strongly disagree about what it means. In fact, the preoccupation with ideational convergence and the resulting diminution of national variation have led to significant scholarly disagreement over the significance of new policy in the absence of a parallel discussion of initial causes. One camp interprets integration requirements as representing a move away from the nation, while the other sees the promotion of language and society knowledge as a return to it. The

26 Joppke, Citizenship and Immigration; Jan Werner Muller, "Is Europe converging on constitutional patriotism? (And if so: Is it justified?)," Critical Review of International Social and Political Philosophy 10, no. 3 (2007), 337-387; Orgad, "Illiberal liberalism: Cultural restrictions on migration and access to citizenship in Europe."); Ines Michalowski, "Required to assimilate? The content of citizenship tests in five countries," Citizenship Studies 15, no. 6/7 (2011), 749-768.

re-nationalizing position might be summarized by Dora Kostakopoulou's view: "In framing integration as an obligation on the part of the migrant, implicit equivalences – such as indigenous/superior/complete and foreign/inferior/lacking – and ethnocentricity resurface."\textsuperscript{28} The de-nationalizing position was summarized by Christian Joppke as: "One is inclined to interpret repressive policies toward them in 'nationalist' or 'racist' terms... Instead, the repressive impulse, at least at the level of state policy, now stems from liberalism itself."\textsuperscript{29} I submit that this disjuncture is more of a reflection of differences between civic integration policies than existing studies acknowledge or take seriously.

As evident in this review, the predominant concern in existing studies is the significance and impact of policies, as opposed to why new policies are cropping up in the first place. Studies are predominantly focused on the fact of civic integration convergence, not the causes of it nor the possibilities of potential variation. While empirically rich, studies lack both theory development and the generation of testable hypotheses to account for initial civic integration policy change, respective state usage, or timing of policy change.

**ORGANIZATION OF THE BOOK**

Acknowledging but setting aside these debates, this book takes a fresh and comprehensive view of civic integration by starting at the beginning. The book’s seven chapters as well as the conclusion take the reader through an empirical and theoretical study of variation in civic integration requirements and the contemporary promotion of membership in the liberal-democratic nation state. Following this introduction, Chapter 1 establishes civic integration policy as a strategy of membership promotion and provides background on the content of civic integration. To do so, it identifies conceptual differences between membership as a relational identity that an individual shares with the state, i.e., a sense of belonging, while the term “citizenship” reflects a subtype of membership and is reserved for describing formal status. It argues that membership and citizenship are related concepts, but they are not coterminous. In particular, membership contributes unique “goods” to the state that citizenship does not inherently or necessarily provide. Having established the meaning of membership and why it matters to states, the final section examines its most recent form: state identity. I draw contrasts between state identity and national identity as overlapping but distinct theoretical and empirical articulations of national political membership.

Chapter 2 establishes the empirical scope of civic integration policy adoption. It presents membership requirements in two “snapshot” periods in the countries of the EU-15. The first snapshot captures membership policy before the widespread adoption of civic integration (policy in 1997; \(t_0\)), while the second snapshot period captures membership policies today (2013; \(t_1\)). To systematically score and compare integration requirements across time, cases, and statuses of residence, I construct a Civic Integration Policy Index (CIVIX). It employs a coding scheme that records individual requirements, specifically whether a state has language, country knowledge, and/or values requirements for entry, settlement, and citizenship for the average immigrant (in other words, excluding refugees and other minority categories). Scores are reflected in an additive scale, providing an overall score by which we can compare the robustness of civic integration requirements across cases. A detailed discussion of coding rules and results is reported in the chapter. By comparing CIVIX scores across two time periods, we see that remarkable change has taken place in moving from informal to formal membership requirements, and in terms of the expansion of the expectations of state-mandated integration across stages of legal access. We also see a number of patterns in terms of policy instruments, with states employing similar tests and courses in order to promote civic integration. These views would seem to support ideational and policy convergence accounts. However, by looking more closely at the empirical diversity of the degree of civic integration policy adoption (portrayed in CIVIX), as well as design, scope, and sequencing, we see significant variation. This puzzle sets up the research question for the following chapter, as well as the case studies in the remainder of the book.

Chapter 3 presents the central argument of the book, accounting for variation in civic integration policy by looking dynamically at the institutional path-dependency of citizenship and the party politics that seek to either reaffirm or change starting positions. First, I consider what effect existing citizenship policy configurations – namely the rules that make acquisition easier or more difficult – have on producing new membership requirements. The second consideration is how the party in power may have membership preferences that coincide with or differ from the existing starting positions. Citizenship and integration prove to be ripe ground for partisanship and populism, particularly around election time. In the absence of opposition (where the government in power’s preference aligns with existing orientation), policy can continue unperturbed, in either liberal or restrictive directions through membership requirement reinvestments. By contrast, opposing preferences can have a moderating effect. Membership requirements are sometimes produced as a compromise to opposition voices, sometimes offered as carrots or concessions to much-needed coalition partners, and sometimes crafted in an insulated policy environment absent far-right actors. In other words, The interaction of politics and initial starting position of citizenship orientation, I argue, accounts for what we see as significant variation in membership policy design, and ultimately, different strategies of membership. I develop an explanatory typology to reflect these different settings of interaction. These are not static, however, and a state may easily move from one strategy to another,
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Membership matters: concept precision and state identity

INTRODUCTION

Civic integration policies consist of cultural requirements, namely language and knowledge of society, that empower individuals to act independently in their host society. Alongside this goal of autonomy, they are also designed to foster cohesion and imbue newcomers with a sense of belonging. Belonging is defined as feeling a part of the national political community. It engenders both a sense of acceptance as well as commitment and shared ownership of national rules, norms, and even common resources (both physical and ideational). This sense of membership is typically considered to be part and parcel of citizenship, where an outsider not only obtains rights and status in a formal, legal transformation but also identity through symbolic change. However, empirical realities illustrate that membership is not an automatic by-product of naturalization. We also see citizenship itself no longer remaining the exclusive status for establishing membership, as some states deliberately extend “citizen-like” expectations to persons seeking residence, not citizenship. Membership is clearly related to citizenship – in the traditional nation-state model, national belonging is formally reflected in citizenship – but contemporary change suggests it holds unique and desirable properties.

This chapter looks closely at the concept of membership in order to understand the character, context, and contributions of new civic integration policies. It answers two simple questions: What is membership and why does it matter? Addressing these questions gets to the heart of why civic integration policy is significant, representing a real sea change in political identity. While the case studies provide descriptive content and context for respective civic integration programs, this chapter answers these questions by examining conceptual and theoretical dimensions. Conceptually, civic integration defines membership and belonging in the contemporary nation-state. Theoretically, these new investments in membership are distinguishable from traditional national identity, promoting an alternative understanding of belonging that I label “state identity.”

What is membership? Conceptual precision

This chapter is organized into three sections. First, I examine the concept of membership in order to establish civic integration as the most recent articulation of belonging in the nation-state. This section defines political membership as a relational sense of belonging distinct from status, formally conveyed through the institution of citizenship. Membership is an umbrella category that captures the way in which an individual identifies, feels a part of, demonstrates an awareness of, or behaves connected to a political community. Citizenship is a formal subtype, consisting of various rules for acquisition and loss. Consequently, there are other statuses that also convey membership. Belonging and status are related but not the same thing; the former can exist without the latter and the latter does not guarantee the presence of the former.

Membership as belonging is also a distinct concept from citizenship as status because we can identify different values that each yields for the state. In this second section, I look to the existing literature on belonging to identify the unique attributes of membership. Most works consider how status and belonging empower or alienate an individual, but in this section I turn the lens around to examine why membership is desirable to the conferring political entity, i.e., the state. Where citizenship is a formal instrument for effectively allocating resources, achieving democratic legitimacy, and even surveilling a population, belonging and membership serve to establish and strengthen social cohesion, foster common group goals, and build loyalty.

Having established civic integration as an articulation of membership and examined how it uniquely matters to the state, the third section contemplates the theoretical significance of this new membership iteration. In examining the content of civic integration and contrasting it to existing understandings of membership derived from national identity, we see the emergence of an alternative script of belonging: state identity. The heading for this section, “Civic integration content: The new and the old,” is borrowed from the title of a 2003 British Home Office paper advocating new and clear citizenship content to replace older and vague tropes of belonging. Where national identity provides a traditional understanding of membership, drawing on the historical experience of nationalism in which rules of belonging are based on a similarity of attributes (“logic of sameness”), the latter and newer notion of state identity draws on contemporary realities of diversity to define rules of belonging to hold together otherwise disparate groups and interests (“logic of togetherness”). And, in conclusion, without the conceptual distinction between citizenship as status and membership as belonging, the unique benefits of promoting membership and the novelty of state identity itself would be lost.

What is membership? Conceptual precision

Civic integration articulates new expectations for belonging in the contemporary nation-state. This phenomenon—that European states require immigrants to integrate civicly—is novel, but it is only the most recent iteration of a
long-standing state concern with nation-building and the promotion of membership. I define political membership here as belonging to an arbitrary community that has the ability to self-perpetuate. It is arbitrary because the relationship is defined by concrete rules (formal) or norms of understanding (informal), where membership versus non-membership is unambiguous. Its ability to endure — whether by the mechanisms of state sovereignty or by the organized, shared traditions and narratives of a nation — allows generations, removed from the moment of creation, also to be a part of the political community.

Membership requirements, therefore, are mechanisms to formally promote attributes or features of belonging that constitute the membership group.

Membership is traditionally conferred through and recognized in the holding of national citizenship; Rogers Smith even defines the “oldest, most basic, and most prevalent meaning [of citizenship] as a certain sort of membership in a political community.” This overlap is further concretized in attaching “the nation” to “the state” vis-à-vis citizenship (also referred to as “nationality”) and, academically, by the heavy influence of the nationalism literature on citizenship studies. If one were to examine only native-born citizenship-holders, citizenship and membership appear indistinguishable. However, we see less of an overlap if we examine immigrants and naturalization. New citizens may not feel connected to the national group or, as is also the case, long-term migrants remain in the polity and establish enduring social and economic linkages to the host society but remain outside the formal political community of citizenship. This exclusion may be self-selected, where an immigrant does not perceive a substantial difference between permanent residency and citizenship, or institutional, where rules prohibit inclusion. Citizenship can and often does designate belonging by ascribing formal membership to individuals, establishing what others have referred to as the identity or symbolic (as against formal, legal) dimension of citizenship, though this is not inevitable. To wit, recent investments in civic integration strategically bolster state membership precisely because existing citizenship practices are found wanting in this regard.

1. This emphasis on the formalized and enduring relationship between an individual and a political community is similar to Soysal’s conception of membership models, which she defines as “institutionalized scripts and understandings of the relationship between individuals, the state, and the polity, as well as the organization structures and practices that maintain this relationship.”


5. For more, see Giovanni Sartori, “Concept misformation in comparative politics,” American Political Science Review 64, no. 4 (1970), 1041. Sartori employs the terms “stretching” and “straining” to capture the same idea.

Why does membership matter? Identifying unique attributes

Charles Tilly outlines in his contract definition of citizenship, “If citizenship is a tie entailing mutual obligations between categorically-defined persons and a state, the identity ‘citizen’ describes the experience and public representation of that tie.” However, deconstructing and conceptually locating the concept of citizenship as a membership subtype not only offers clarity but also enables a more careful view of membership policy change and impact.

WHY DOES MEMBERSHIP MATTER? IDENTIFYING UNIQUE ATTRIBUTES

Why is it important to distinguish membership from citizenship? In short, membership conveys unique and desirable properties and citizenship is not always sufficient for delivering them. These include establishing and strengthening social cohesion, fostering common goals, and building loyalty. Historically, these goods were conveyed through citizenship as an institutional leaver for recognizing and regulating national identity. However, in a globalized age of migration, this scenario is narrow at best. The promotion of new membership requirements illustrates that it is clearly not enough that people are citizens, and formally interact with the state through mutual agreement, but also that people are integrated into the state, identifying with that state in some meaningful capacity, whether by feeling or by behavior. If citizenship were sufficient to foster this kind of identity, we would not see the kind of massive, wholesale repairs to belonging through civic integration in which states are “rediscovering citizenship as a tool for integration.” This integration imperative exists both inside and also beyond the status of citizenship. In particular, membership matters where citizenship is insufficient in facilitating identity, and especially where it is inaccessible to deserving and eligible persons in a democratic state.

Citizenship is still relevant, of course, but it is not without its problems. In contrast to political behavior studies that question the impact of identity and belonging on immigrant participation or preference formation, this study turns the lens of analysis around to look at the membership-conferring entity.
itself. Why do states care about membership? How do they benefit by promoting belonging to newcomers? There has been considerable research that examines the tangible benefits of national citizenship to states, while there is comparatively little that examines membership, particularly from a perspective that disaggregates these benefits from citizenship. Both citizenship and membership matter to the state, but they matter in different ways.

Beginning with citizenship, a large number of studies have delved into how citizenship affects immigrants in terms of inclusion and access. In this framework, national citizenship still matters as the “sole basis for certain rights” and a “predictor of ... other forms of political participation.”14 But what do states get out of ascribing citizenship? Particularly, why do they jealously guard their right to confer and withhold citizenship in an ever-integrated if lackluster European Union? First, citizenship is the most effective instrument for allocating resources. Brubaker’s definition of citizenship is along these lines in describing it as an “international filing system.”15 This function dates all the way back to Aristotle’s examination of the city, noting that an ideal regime is one with a population size with “the greatest excess of number with a view to self-sufficiency of life that is readily surveyable.”16 In other words, a precise understanding of the number of citizens enables the state to effectively identify and allocate resources. A city is deemed too large when “it is easy for aliens and foreigners ... to escape notice on account of the excess of number.”17 Citizens participate in decision-making and governance, while members are ruled but do not have the right to rule. This relates to a unique, more elemental second value of citizenship: it is a foundation to democratic legitimacy. As democracy is government accountable to and run by citizens, the rules for how states create those citizens is significant to determining democratic quality.18

17 Ibid., 205 (1326b20–22). This, of course, is the basis for a more contemporary function of citizenship: an instrument of surveillance. John Torpey even suggests that a state’s right to distinguish between citizens and outsiders, and its ability to control movement inside and outside its territory is the very core of “state-ness.” John Torpey, The Invention of the Passport: Surveillance, citizenship, and the state (Cambridge: Cambridge University Press, 2000), 1–2.
18 Robert Dahl even defines inclusive citizenship as an institutional minimum for good governance, where “no adult permanently residing in the country and subject to its laws can be denied the rights that are available to others ... [including liberties and opportunities that may be necessary to the effective operation of the political institutions of large-scale democracy.” Dahl does not appear to be making a claim one way or the other about immigrant inclusion in this community, but he is unambiguous about the importance of inclusionary citizenship (specifically by gender, religion, and race) to high performing, consolidated democratic regimes. Robert A. Dahl, “What political institutions does large-scale democracy require?,” Political Science Quarterly 120, no. 2 (2005), 189.

Why does membership matter? Identifying unique attributes

Citizenship as a membership category continues to convey group feeling and attachment to a majority of its holders. But membership and belonging is also promoted outside this status.19 Existing research on membership is primarily concerned with the nature of state attachment (namely, that it is liberal and universal20) and not with what state attachment achieves or why it matters. This is a critical oversight in the literature. If we desire to know why states promote and preserve membership, we need to establish what membership and attachment produce in terms of state goods. By examining a wide range of literatures, these can be identified as strengthening social cohesion, fostering common group goals, and – potentially – building loyalty.

First, membership produces social cohesion by imbuing individuals with a set of values and skills that – in their absence – would lead to anomic living.21 In one of the earliest definitions of social cohesion, Moreno and Jennings establish it as “the forces holding the individuals within the groupings in which they are.”22 Looking at the policies of civic integration – the stated goal of which, in the language of the original law implementing civic integration in the Netherlands, is to “increase the self-sufficiency of newcomers”23 – it does not seem obvious how it produces social cohesion, or togetherness; the promotion of autonomy might even imply the direct opposite of social cohesion. Yet, in liberal democratic settings, it is the very idea that individuals are self-sufficient – able to enter the labor market, politically participate, and interact in a variety of spaces – that pulls otherwise isolated individuals together in society. Immigrants who possess autonomy in these societies have the potential to experience the full extent of individualism and pluralism, for where there is social cohesion, liberal democratic societies can “handle conflict and remain stable.”24

Some of the specific values that social cohesion relies on include trust, engagement, and organizational membership. None of these is possible if an individual lacks the skills or incentives to participate. The idea of social cohesion – and specifically of civic integration – is that individuals begin to participate in different kinds of interactions – not just “bonding” forms of social capital within one’s family or ethnic community but “bridging” networks of cross-cutting, interpersonal relationships between ethnic, economic,

19 In fact, even the allocation of resources is no longer exclusive to citizenship. In the UK, for example, access to non-contributory welfare is contingent on settlement and not citizenship.
20 See, for example, Joppke, Citizenship and Immigration, ch. 5.
21 Of course, membership necessarily produces both social cohesion and social exclusion, where some people must necessarily be excluded to have a coherent whole. On this, see Linda Bosniak, The Citizen and the Alien: Dilemmas of contemporary membership (Princeton, N.J.: Princeton University Press, 2006).
Membership matters: concept precision and state identity

or familial lines. Sociologists and psychologists explain this phenomenon through the "contact hypothesis," which suggests that contact through cross-cutting networks, across inter-ethnic, racial, idealational, and interest-based groups, reduces intergroup biases, and therefore conflict. Within political science, research shows that the absence of cross-cutting networks in the context of ethnic and religious diversity erodes social capital. Low levels of social capital reflect low levels of trust and participation, and thereby impact the quality of democratic governance. Inversely, a robust civic society and high levels of participation from a cross-section of society directly contribute to democratic health and good governance. Therefore, states directly benefit from promoting skills and state-imputed values associated with membership at all stages of permanent status, as they yield democratic goods among legally included insiders.

The second benefit of membership is that it establishes common group culture. Smith notes that force alone is not enough for leaders to keep society together: "Most aspirants to power wish to govern people who are genuinely persuaded that ... they are one people." Common culture is distinct from social cohesion, where society "hangs together" through participation and trust. The promotion of common culture establishes a point of orientation for society to rally around. This, in turn, becomes a baseline of shared norms and goals that enable representative and legitimate democratic decision-making. As a result, it is not simply in the interest of those who hold citizenship; residents and newcomers are also affected by government decisions. Moreover, social psychologists tell us that privileging superordinate identity (as opposed to subgroup identity) not only leads individuals to value societal authorities rather than narrower instrumental interests, it can also contribute to the reduction of intergroup bias.


Smith goes on to articulate that the scripts used to bind people together are myths, in other words constructs indicating "how a political community originated, who is eligible for membership, who is not and why, and what the community's values and aims are." Rogers M. Smith, Civic Ideals: Conflating visions of citizenship in U.S. history (Yale University Press, 1999), 32-33.

Yuen J. Huo et al., "Superordinate identification, subgroup identification, and justice concerns: Is separatism the problem; is assimilation the answer?", Psychological Science 7, no. 1 (1996), 49-45.


Why does membership matter? Identifying unique attributes

The notion of the liberal-democratic state promoting common goals and culture has been problematized by a number of political theorists who take umbrage with the "ethnoculturally neutral" liberal state prioritizing some values/goals/cultures over others. However, Will Kymlicka rejects this act as a violation of liberalism, noting that the liberal democratic state is quintessentially a "nation-building" state into which outsiders must minimally integrate. In contrast to perceptions that societal culture must be a "thick, ethnographic" sense, referring to the sharing of specific folk-customs, habits, and rituals, Kymlicka points out that just as the "lack of a common thick ethnographic culture is part of the very definition of a liberal society ... it is equally essential to modern liberal forms of governance that citizens share a common culture in a very different, and thinner, sense, focusing on a common language and societal institutions." Accordingly, thin nation-building that promotes common language, culture, and public institutions serves a number of goals, including creating an "equal opportunity to work," "equal access to mainstream institutions," and "the sort of solidarity required by a welfare state," as well as proving "essential to democracy." He asks, for example, "How can 'the people' govern together if they cannot understand one another?"

A final contribution of membership is the establishment of loyalty. The benefits of membership most directly intersect and overlap with the benefits of citizenship here. Non-birth based citizenship was traditionally obtained by, among other criteria, demonstrating fidelity and swearing an oath to the state and its laws. In this coordinated concept, citizenship as nationhood was understood not only as giving an individual rights and protections, but also in playing a role in "fostering solidarity." Today we understand these connections to be more contingent. The idea of loyalty, according to David Miller, is not necessarily that a citizen would take up arms, but is more "subterranean" in nature: "even those who profess their indifference to nationality under ordinary circumstances are very likely to find that, at those exceptional moments when the fate of the whole nation is determined collectively, their sense of identity is such that they see their own well-being as closely bound up with that of the community.


Will Kymlicka, Politics in the Vernacular: Nationalism, Multiculturalism, and Citizenship (Oxford, UK; New York: Oxford University Press, 2001), 25, fn. 18. While immigrants integrate into receiving societal culture, they also need a societal culture as a resource to access freedom and equality. This cultural membership --- that they bring with them to the host society --- is protected by multicultural citizenship.

Ibid., 26.


In fact, one of the most strident defenses against dual citizenship today is the notion that multiple citizenships create multiple loyalties, therefore undermining a singular state solidarity.\(^{36}\) While a number of states have moved to allow dual citizenship for immigrants (Finland, Italy, Luxembourg, Sweden), others have been moderate (Germany, the Netherlands) or have resisted change altogether (Austria). States formally limit the multiplication of loyalty when they do not allow for dual citizenship, but do states get loyalty by extending citizenship? This is the wager — not the foregone conclusion — of naturalization. The very purpose of citizenship ceremonies, introduced in the UK and the Netherlands and modeled on the American experience, is to actively foster loyalty to the state and particular conceptions of national identity.\(^{37}\) Individuals are more likely to feel loyalty if they perceive their citizenship represents more than merely a passport. There is also evidence to suggest that where migrants earn citizenship and feel a sense of accomplishment in achieving citizenship, they have a higher value of it.\(^{18}\)

In conclusion, membership provides important “goods” to the state. While traditionally these were formally conveyed through citizenship, new membership requirements at any number of status venues suggest that this picture of exclusivity is long gone. Yet, as both the concept formation and theoretical discussion sections show, membership does not replace citizenship. On the one hand, membership “reinforces”\(^{39}\) citizenship by introducing new content and obligations in a mutually reinforcing — not zero-sum — relationship. On the other hand, while strengthening citizenship with these new investments in identity, membership also invigorates other statuses, namely long-term residence. In the next and final section of the chapter, I characterize this new, instrumental membership directly by contrasting contemporary articulations of belonging — which I term “state identity” — to that of its historical antecedent, national identity.

CIVIC INTEGRATION CONTENT: “THE NEW AND THE OLD”

Given that membership matters, and matters as a category of belonging in ways unique to citizenship as a legal status, what sort of membership does civic integration create? How similar or different is membership defined through civic integration from that of traditional national identity? In answering these

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40 This alternative word to “nationalism” comes from Rogers M. Smith, Stories of Peoplehood: The politics and morals of political membership (Cambridge: Cambridge University Press, 2005). 41 While Rogers Brubaker’s initial claim of the impact of nationhood on citizenship policy was quite strong, he later distanced himself from this stark view, arguing with Jaeun Kim that the explanatory power of ethnic nationalism (in reference to Germany and South Korea) is actually quite weak and that membership politics are “more crucially framed and constituted by geopolitical contexts, state categorization practices, and political struggles.” He does not examine this claim in civic nationalism contexts. See Rogers Brubaker and Jaeun Kim, “Transborder Membership Politics in Germany and Korea,” European Journal of Sociology 52, no. 1 (2011), 25. 42 Anthony D. Smith, National Identity (Reno: University of Nevada Press, 1991), 14. In later work, Smith revises his definition of nation to exclude the emphasis on the mass character of public culture, the reference to a “common economy,” and the replacement of “common legal rights and duties” with “common laws and customs.” One assumes that these revisions extend to the definition of national identity as well. For an analysis of this shift, see Montserrat Guibernau, “Anthony D. Smith on nations and national identity: A critical assessment,” Nations and Nationalism 10, no. 1-2 (2004), 125-41.
allocation, and organization of people. There is variation in terms of nations existing before and thus justifying statehood (e.g., Israel) or political projects for recognition (e.g., Catalans) versus nations created in response to the challenge of statehood consolidation (e.g., France). However, once nations and states become "nation-states," the definitive linkage between the two in practice is forged in citizenship. This is the central argument to Rogers Brubaker's Citizenship and Nationhood in France and Germany, where he posits that citizenship—defined as an "instrument and object of social closure"—perpetuates notions of national belonging, with the rules conferring citizenship based on cultural idioms of nationhood. Insiders are those with access to rights and membership, and that is—in turn—determined by understandings of nationhood. In citing Brubaker elsewhere, Hopke summarizes that citizenship is not just state membership but "national membership," in which "[t]he political community should be simultaneously a cultural community, a community of language, mores, or belief." Formal membership of the state is initially ascribed to co-nationals, while those who are not co-nationals at birth or by descent have to "naturalize" to the national political community. It is therefore appropriate that citizenship and nationality are colloquially synonymous, and rules that convey citizenship are often labeled or translated as nationality laws and acts. One who holds citizenship is a national; therefore, becoming a citizen is the process of taking on national membership and its attendant identity and culture.

How does an immigrant become a member in the nation-state? Belonging is conveyed through the acquisition of status, where rules for becoming a citizen—jus soli provisions, residency requirements, etc.—regulate the width or narrowness of the aperture for membership. These rules carry implied expectations for belonging over time. For example, long durations of residence (e.g., Germany used to require fifteen years, Austria ten years) in theory ensures language proficiency and social connections for the applicant at the end of that period. The key difference between these mechanisms and civic integration is, of course, the rigor of objective assessment versus the implicit assumption that integration naturally occurs over time. Instead of integration through performance and proactive behavior, the latter represents integration through what Peter Spiro describes as merely "being there."

The extent to which the content of national identity is not implied but articulated is captured in what can be called generalized integration clauses. In

Civic integration content: "The new and the old"

1977, for example, Germany first required that naturalizing foreigners demonstrate a "voluntary and lasting orientation towards Germany" without consistent measures of assessment. France has maintained an assimilation requirement since 1927 that it primarily evaluates through language ability. And Greece has long-maintained a "lasting orientation" requirement, which was satisfied through a subjective interview assessing lifestyle and social connections. While technically an integration requirement, they all illustrate an enduring logic of sameness. The intention is that of circumscribing, not transforming, an eligible population for citizenship. In fact, evidence considered to support sufficient integration can easily be changed; once an historical marker for cultural ties, today it is a proxy for policymakers to enforce opposition to polygamy, among other values.

But perhaps the oldest form of national membership promotion practiced by European nation-states is the oath. This, too, is primarily an historical handprint of the nation-state as it emerged from the nineteenth century and not an adjustment of national citizenship law to large-scale immigration today. France has had an oath since the eighteenth century, Finland between 1920 and 1941, and Greece since 1955. Even as far back as medieval Italian city-states, citizens were "required to take an oath, for example, to obey the laws, attend meetings, to pay taxes, to undertake military service. Oaths taken today are not all that dissimilar: immigrants in Germany are required to uphold the democratic values and Constitution of the federal republic, and in the UK to "bear true allegiance to Her Majesty Queen Elizabeth the Second . . ." as well as give "loyalty to the United Kingdom and respect its rights and freedoms." The longevity of oath practices indicates that fidelity to the state has long been a valuable component.


46 Joppke, Citizenship and Immigration, 111.


49 Christophe Bertossi and Abdellali Hajat, "France," in EUDO Citizenship Observatory Country Reports (Florence: EUDO Citizenship, Robert Schuman Centre for Advanced Studies, EUI, 2013), 18. Assimilation into the French community has been recently defined in the Civil Code (21–4) in more specific terms to include "a sufficient knowledge of the French language, history, culture, and society; a knowledge of "rights and duties conferred by French nationality" (since 2003), as well as "adherence to the principles and values essential to the Republic" (since 2010).

50 According to the French Constitution of 1791, a foreign-born person could naturalize "after five years of continuous residence in the kingdom, if, in addition, they have acquired real estate, married a French woman, or founded an agricultural or commercial establishment, and if they have taken the civic oath (serment civique)." The oath was as follows: "I swear to be faithful to the nation, to the law, and to the King, and to maintain with all my power the Constitution of the kingdom, decreed by the National Constituent Assembly in the years 1789, 1790, and 1791." Available at the Conseil Constitutionel website (http://www.conseil-constitutionnel.fr) (accessed June 4, 2014). Note that the Americans quickly followed suit, adopting an oath in the Naturalization Act of 1795.

51 Derek Benjamin Heater, Citizenship: The civic ideal in world history, politics, and education (Manchester, New York: Manchester University Press, distributed in the USA by Palgrave, 2004), 51. Of course, non-citizens are not "foreigners" as we understand the term today, but typically persons from outside the city-state or persons just coming into property.
of gaining citizenship, but we see in the expansion of requirements that it is no longer sufficient.

In these practices, national identity is preserved and citizenship conferred based on the logic of sameness. Inclusion in national identity is based on resemblance and recognition. For outsiders to become insiders, they must be absorbed into the host society. It might seem surprising that more formal membership articulations were not attached to acquisition sooner, especially as some European countries are regarded quintessential "ethnic states." In a general sense, it reveals a previous "taken for granted" quality of membership, defined in national citizenship for primarily monocultural nation-states. It also indicates a belated reaction to large-scale demographic change in receiving states to formally articulate what was once implicit, bringing European-receiving states more closely in line to traditional countries of immigration, like the United States and Canada.

State identity is quite distinct from national identity. First, we see states actively defining the essence of belonging, instead of implying norms of belonging. Parliaments and policymakers are having debates about what it means to write a single definition of "Germanness" or "Britishness." In late 2009, for example, Nicolas Sarkozy’s government launched a series of town hall meetings and online forums to debate what it means to be French in the twenty-first century. Second, it maintains inclusion through achievement, instead of recognition. Inclusion is not an amorphous transformation through a permeable skin of membership; it is a step-system where an individual fulfills certain criteria and "climbs the ladder" to inclusion. Third, inclusion and membership can be achieved in a non-citizenship status. While an immigrant becomes a member of the national community only through the acquisition of citizenship, state membership can be obtained by passing integration hurdles to become a permanent resident. And, finally, while the ultimate goal of state identity might be characterized as individual independence underscored by common values, we might ascribe national identity as more limited with just an interest in group solidarity. In a post-immigration reality, state identity reflects recognition by policymakers that there are unique "goods" unto membership, but that national membership is declining as a desirable or even meaningful category of belonging.

The content of civic integration, one can peer into any number of course syllabi, exam preparation booklets, instructional videos, etc. made available to prepare an immigrant for requirements for settlement or citizenship and obtain a similar impression. The first pages of the British handbook read as follows: "The fundamental principles of British life include: democracy, the rule of law, individual liberty, tolerance of those with different faiths and beliefs, participation in community life." The first value articulated in the French Welcome and Integration contract is "France, a democracy," followed directly thereafter by "France, a country of rights and duties." Similarly, the first line on the Danish declaration on integration and active citizenship commits an applicant for permanent residence to "comply with Danish legislation and respect the Danish democratic principles in every respect." In the Danish study guide for citizenship - "Denmark: Past and Present" - the first pages are preoccupied with understanding history, like the origins of Denmark’s Constitution, not for its own sake but as the "starting point for the development toward the existing parliamentary democracy," as well as a means for understanding the monarchical system, the welfare society, and everyday life. In Germany, the citizenship test primarily assesses knowledge in three areas: life in a democracy, history and responsibility, and man and society. And for immigrants integrating in the Netherlands, a compulsory exam for settlement primarily focuses on Dutch language proficiency, assessing reading, listening, and writing. Immigrants also take a "knowledge of Dutch society" exam, which requires the test-taker to listen to scenarios and answer questions that vary from "What do you do during the moment of silence [on Dutch Remembrance Day]" to "Who can give you a prescription?"

These examples suffice to illustrate that the common thread across different devices and strategies is content emphasizing liberal values, including democracy, freedom of speech, toleration, autonomy, and equality. This includes content covering the rule of law, government, freedom and rights, as well as holidays and national customs. While nationally specific cultural references and customs are interspersed throughout, the emphasis on values and institutions is unequivocal. The overarching theme reflects what Jürgen Habermas describes as "constitutional patriotism," in other words, to promote a loyalty to common values (codified in a Constitution or body of law). Specifically, it embraces the idea that "political attachment ought to center on the norms, the values, and more indirectly, the procedures of a liberal democratic constitution." Liav Orgad redirects this loyalty away from Habermas’ amorphous, universal "just constitutional regime" by emphasizing national constitutionalism, which manifests in the state’s interest of "protect[ing] core constitutional principles because they are ours."
other words, it is important to understand not only the institutions of democracy but a country’s unique path to democracy.

An ancillary theme is individualism, where it is incumbent upon immigrants as individuals to understand their rights, the rights of others, and how to function with autonomy – and not as a member of a subgroup – in their adoptive home. This is in contrast to integration approaches like multiculturalism, where the idea is that immigrants participate in a host society through maintaining group attributes, such as offering language translation for state services. This repertoire is designed to empower individuals to participate in their new society, from finding a job and obtaining education for their children to participating in democratic institutions, and even availing themselves of welfare services. Language is not a marker of culture or ethnicity in this regard but rather a functional tool for participation and labor mobility.

Through the acquisition of skills and enablement of individual autonomy, membership under state identity is achieved, not merely bequeathed. The membership community is shaped through proactive behavior, not an acknowledgment of pre-existing attributes. In theory, the type of belonging promoted through civic integration creates an accessible, common bond uniting otherwise “most-different” people. And, regardless of ethnicity or religious background, a commitment to liberal values safeguards plurality in membership. Therefore, I refer to the type of identity promoted through civic integration as defined by a “logic of togetherness.” It promotes a minimally transformative process, advocating common values and skills for autonomy without sacrificing home culture. State identity can be shown to be distinct from historical projects of national identity, in which common traits were identified to bind most-similar people together for the purposes of self-determination, recognition, and legitimacy. In principle, state identity and liberalism provides enough of a common bond to glue native and immigrant communities together, but not so much that one needs to forego home culture or traditions. It is a horizontal bond that can achieve group solidarity without sacrificing vertical, multicultural affinities. Obtaining membership through state identity may be just as difficult as obtaining it through national identity, but it is at least possible and, if achieved, is due to a migrant’s own efforts. In sum, state identity – operating under the logic of togetherness – pulls individuals together. It does not transform them to be similar, as traditional assimilation and the logic of sameness under national identity would direct.

This question of balance between shared state values (liberalism) and toleration of religious or ethnic values (ostensibly illiberal), as well as the idea of promoting autonomy and liberal values through mandatory and potential illiberal means, raises a question as to how liberal these tests and requirements really are. Assessments of test illiberality are different than assertions that they are hard. Tests can legitimately measure knowledge of institutions and culture with varying degrees of difficulty. Accusations of illiberalism are based on a perceived

59 For example of both Kantian and Rawlsian versions, see Bauböck and Joppke, eds., How Liberal are Citizenship Tests?
61 Bauböck and Joppke, eds., How Liberal are Citizenship Tests?, 25.
62 Yes, Christmas is a “Christian holiday,” but when it is defined in the UK handbook as potential test material, it informs the reader that celebrating in the “traditional way” includes “(spend[jing] the day at home and eat[ing] a special meal, which often includes roast turkey, Christmas pudding and mince pies,” not Church attendance for non-Christians. Home Office, “Life in the United Kingdom: A guide for new residents,” 79.
Membership matters: concept precision and state identity

points to highlight that this new state identity has not gone uncontested or unexamined. Of course, it should be said that in these studies, European practices deemed illiberal are always compared to what is deemed the most liberal case: the United States as the ideal-type. However, as Smith painstarily points out, even the United States is a diminished example by design, describing how it has "always expressed illiberal, undemocratic ascriptive myths of U.S. civic identity, along with various types of liberal and republican ones, in logically inconsistent but politically effective combinations." 64

The politics of civic integration are not only defined by academic concerns over compliance with or violations of liberalism, there is also significant debate within practicing states over content. Civic integration projects hang together by a common thread of liberal values and the "logic of togetherness," but this does not negate the very substantial discussions that occur over what the content of membership should be. Certain states experience more muted dialogues – for example, Dutch policymakers primarily debated who would pay for integration and not the substance of integration itself 65 – while debates in other states were more heated. As a result, there has been some significant rewriting of citizenship tests in the past decade or so. Two examples suffice as they illustrate exact opposite trajectories. The original format of the "Life in the UK" citizenship test under New Labour focused on knowledge deemed necessary for what its creator Bernard Crick called "active citizenship," which excluded questions on history. The Conservative–Liberal Democrat coalition government, however, introduced a new citizenship test in 2013 which is almost entirely comprised of history and culture. For example, the new study guide covers topics from Oliver Cromwell to the Beatles. The Danish test has also changed, but in the opposite direction by moving from trivia to assessment on practical knowledge. This is reflected in the name change of the test itself, from the "Indfødsretsprove" – where "Indfødsret" is an historical designation of a citizenship-like legal status acquired by foreigners – to the "Statsborgerskabsprove," or citizenship test. 66

State identity remains contested from any number of perspectives; some may decry the content as too minimal, while others identify the success of integration barriers as an unnecessarily arduous chain of conditionality. Identity is an inherently contested concept because it is intersubjective. Still, it remains quite distinct from national identity and represents the most current iteration of membership and, for lack of a more differentiated vocabulary, nation-building. It is nation-building in the least "national" way imaginable. Compared to national identity, in which the logic of sameness acknowledges membership based on shared ascriptive attributes, recognizing inclusion of outsiders as a contingent process, the starting point of state identity is a set of value commitments, including individualism and toleration, to which any interested person regardless of ethnic background can ostensibly commit. While, in practice, this minimal articulation of entry criteria may be quite substantial for an immigrant to achieve, particularly language proficiency, the principle is that with acquisition they achieve membership – ironically – through their own autonomy. State identity pulls people together, establishing solidarity among different groups by creating a baseline of values and skills and without requiring individuals to sacrifice their differences.

CONCLUSION

This chapter has illustrated not only how belonging has continuously served as an important and unique component to the contemporary nation-state, but also that the substance of and logic behind membership has altered quite significantly. State identity is the most current iteration of membership, promoting a sense of belonging that is distinct from traditional national identity. The two identities continue to exist alongside one another, and both rely on citizenship as a reference point for membership. However, while national identity continues the tradition of maintaining a perfect overlap of membership with citizenship, state identity challenges the seamlessness of the membership–citizenship nexus.

Moreover, by comparing the closely related but distinct concepts of citizenship and membership in this chapter, we see that they are both integral to establishing lasting connections between states and newcomers, but integral for different reasons. The payoff of distinguishing the concepts of citizenship from membership is to get hold of contemporary states' astonishing investments in immigrant integration into mainstream institutions and values both in and short of citizenship acquisition. It allows the identification of civic integration as a unique set of policies that does not alter existing citizenship configurations, but rather is layered on top of them. And in isolating membership, we can contrast civic requirements to earlier imputations of belonging that are derived from nationhood and encapsulated in citizenship as a policy legacy. Civic integration requirements, in other words, provide an explicit framework for understanding membership in now-multiethnic nation-states. What it leaves, however, is a very legalistic and anodyne citizenship stripped of its symbolic dimension and meaning. This is the very heart of what we might call the contemporary citizenship problem: citizenship – born under the nation-state system – is designed to be both a status and a membership category. That it is deemed insufficient to

63 Scholars have been preoccupied with this question of liberalism. See for example: Phil Triadafilopoulos, "Illiberal means to liberal ends? Understanding recent immigrant integration policies in Europe," Journal of Ethnic and Migration Studies 37, no. 6 (2011), 861–885; Bauböck and Joppke, eds., How Liberal are Citizenship Tests? Elspeth Guild, Kees Groenendijk, and Sergio Carrera, eds., IJliberal Liberal States: Immigration, citizenship, and integration in the EU (Farnham, Surrey; Burlington, VT: Ashgate, 2009).
64 Smith, Civic Ideals: Conflicting visions of citizenship in US history, 470.
66 These two statuses used to be distinct categories in Danish law and were not merged until the twentieth century. See Eva Erbsøl, "Denmark," in EUDO Citizenship Observatory Country Reports (Florence: EUDO Citizenship, Robert Schuman Centre for Advanced Studies, EUI, 2013), 1.
circumscribe and support a national community by contemporary policymakers (as evidenced in the adoption of new parameters for and expectations of belonging) is the starting point for understanding the significance of civic integration contributions, not a consequence of it. Reinvestments in citizenship through membership indicate that states still care about national discretion to designate insiders and outsiders, but also that citizenship by itself is (no longer) enough.

2

Identifying empirical variation in civic integration policies

INTRODUCTION

This chapter develops and presents systematic comparisons of civic integration policies in Western Europe in a Civic Integration Policy Index (CIVIX). Civic integration requirements are distinguished by both their content (articulated expectations for belonging, including society rules) and innovative commitments, including language and civic orientation courses, knowledge tests, naturalization ceremonies, integration contracts, etc. In developing a comparative index for capturing this variety of commitment across three legal statuses (entry, settlement, and citizenship), we see confirming evidence of a convergent "civic turn," consistent with a number of existing studies. However, we also see distinct variation in the degree to which states adopt civic integration. Indeed, developing an index to represent new membership requirements enables systematic comparison across cases, providing evidence both of cross-national change and of continued variation.

This aggregate, index-level view reflects significant variation in policy. But, beyond CIVIX scores, variation is also visible by looking more closely at (1) policy design (i.e., what instruments are used); (2) scope of requirements (i.e., how many categories of status are targeted); and, (3) sequencing of policy adoption across legal stages (specifically, whether requirements are unveiled first at permanent residence versus citizenship). This diversity has not gone entirely undetected in existing studies of civic integration policy. In fact, many have taken up the task to descriptively map policy patterns, identifying differences not only across states but also across legal statuses that paint very