

# Citizenship Tests: A Comparative, Communitarian Perspective

AMITAI ETZIONI

## Citizenship tests as means of immigration control

AT FIRST, it may seem that citizenship tests are just what their title implies: tests that determine whether a person is qualified to become a citizen. Actually, in many nations that require such citizenship tests, the vast majority of the individuals involved are not required to command any qualifications to become citizens and hence are not tested. They become citizens solely by virtue of the geographical location in which they were born. True, *jus soli*, or right of citizenship by the place of birth, exists as the dominant form of acquiring citizenship in the United States, Canada and several Latin American countries. The *jus soli* principle has primarily become a Western Hemisphere tradition.<sup>1</sup> It is often contrasted with *jus sanguinis*, or right of citizenship by nationality of parents, which exists in varying degrees in Germany, the United Kingdom, France and the Netherlands. It is historically a European tradition, and although elements of *jus sanguinis* can be found in the United States and neighbouring countries, it is the primary mode of citizenship acquisition in Europe. Still, under *jus sanguinis* too most citizens must not qualify to acquire their citizen status. Most of the individuals involved thus view their right to become citizens as a birthright, and not conditioned on any performance, test of competence or assumption of responsibilities. Even when these 'native' individuals commit heinous crimes, only some of their rights, such as the right to vote,

may be denied, but they cannot be deprived of their citizenship. (Among the rare exceptional conditions under which citizenship can be stripped are instances where those involved are not native citizens but immigrants who lied on their citizenship application forms.)

Citizenship tests, rather than establishing qualifications for citizenship, are instead very often used as a tool to control the level and composition of immigration. This can be gleaned from that (a) it is almost exclusively immigrants or their children who are subject to these tests and that (b) historically, citizenship exams have been introduced or modified in line with changing attitudes towards immigration in those nations that utilise them.

One might assume that by setting low standards for passing these tests, as it can be argued the United States has done, these tests encourage rather than curb immigration. As Noah Pickus pointed out in the 1990s, 'the examination tested memory more than knowledge', and few applicants failed the test, while the majority gained scores of 80 per cent or higher.<sup>2</sup> However, even tests with very limited demands tend to be viewed (often accurately) as an impediment and deterrent to at least some immigrants, making the nations involved less attractive as targets of immigration.

The United States is currently in the process of introducing a new citizenship test, which will be tested and refined throughout 2007 and put in place in 2008. Already there has been stiff resistance from immigrant groups to a new test

that would make the acquisition of citizenship more difficult. Over 230 immigrant groups have put their signatures to a letter, sent to the US Citizenship and Immigration Services, that raises concerns 'that the new test will raise the bar too high for those with less education'.<sup>3</sup> The International Institute of Boston points out that even before these tests are set at a higher bar—which the United States is planning to do—the current tests already discriminate against poorer, less educated immigrants.<sup>4</sup> And 'despite rising naturalization rates, millions of eligible immigrants, particularly those who are poorer and lack English language skills, opt to not seek citizenship', reports *The Boston Globe*.<sup>5</sup> The Immigrant Solidarity Network, an advocacy and immigrant rights group, claims that rising application fees, lengthened application forms and the new, more difficult citizenship test 'send a strong signal to many patriotic new Americans that they are not welcome as full participants in their new country'.<sup>6</sup> These concerns apply to other nations as well: Brigitte Losch, a Member of Parliament in Baden-Württemberg, decried her state's new test as 'an unbelievable form of discrimination and abuse of equal rights'.<sup>7</sup>

Indeed, tests have been historically introduced or tightened in response to political or populist pressures to limit immigration in general, or certain kinds of immigration in particular. In the United States, for instance, citizenship tests were first introduced at the beginning of the twentieth century, although the use of literacy or civic knowledge as prerequisites for naturalisation dates back considerably earlier. The introduction of the tests at the time followed the rise of anti-immigrant feeling around the beginning of the twentieth century.

The invention of the American literacy test is attributed to economist Edward Bemis; he devised it in 1887 as a means of discouraging often illiterate southern and eastern Europeans from immigrat-

ing.<sup>8</sup> As the nineteenth century drew to a close, anti-immigrant feeling shifted from primarily targeting Irish Catholics to opposing immigrants from non-western Europe and from Asia. Promulgating and advocating the test became the work of Congress members who opposed this immigration, as well as nativist groups such as the American Protective Association and the Immigration Restriction League. The latter 'devoted itself single-mindedly to agitation for the literacy test'.<sup>9</sup> They, along with other nativist groups, argued that immigrants were sabotaging 'American character' and 'American citizenship'.<sup>10</sup> Combined with national quotas, the literacy test, followed by the civics test, served for over thirty years as a tool to limit immigration.<sup>11</sup>

The 1952 Immigration and Nationality Act further enshrined both the civics and literacy tests in American immigration policy. Prior to 1952, the civics test in particular was only vaguely defined or mandated; the 1952 Act clearly defined both tests—its language stood mostly unchanged for about fifty years. As of 1952 the tests were used as a barrier to admission not just to Asian immigrants but also, as the Cold War ramped up, to known communists or communist sympathisers.<sup>12</sup> Although the 1952 Act drew on 'sociological theories of the time relating to cultural assimilation', as opposed to the blatantly racial theories of the 1920s, it was nonetheless legislation clearly aimed at exclusion.<sup>13</sup> Similarly, the 1986 Immigration Reform and Control Act was aimed in part at preventing illegal immigrants from Latin America from becoming citizens. It was heavily supported by immigration control groups espousing a modern form of the nativist sentiment that yielded the first citizenship tests.

In its current form, the US citizenship test may not at first seem like much of a hindrance to immigration, because the tests contain easy to answer, factually based questions, such as 'What were the

original 13 colonies?’ and ‘Who said “Give me liberty or give me death”?’ The 100 possible questions that may be asked are published in advance and can be obtained from the US Citizenship and Immigration Services (INS). Applicants are required to answer correctly only six of ten questions, and the test can be repeated once within a given application cycle, but indefinitely with repeated applications. Still, the test hinders those who do not speak English and favours immigrants from English-speaking countries and persons who can afford extensive English education prior to their arrival, or once they are in the United States.

Although the INS has used a set of 100 questions for the civics exam since the early 1990s, until very recently the test format itself was not standardised; questions were administered according to the preferences of each INS examiner. A 1996 Center for Equal Opportunity study found great disparities by region and offices within a region in the number of civics questions asked, the percentage needed to pass the test and the form in which the test was conducted.<sup>14</sup> This ‘flexibility’ has allowed officials to respond to the political climate of the time, by altering the rigorousness of the test depending on the local and national political culture. Currently, in the United States, changes are in the process of being prepared that will significantly alter the content of the citizen test, both making it more demanding and giving it a greater focus on acculturation and assimilation, rather than the acquisition of facts. Although the new test has not yet been finalised or adopted, its critics are already denouncing it for making the process more difficult: ‘The administration is putting up [another] wall to citizenship for immigrants between a long application process, higher fees, and what may very well be a more difficult test’, said Ali Noorani of the Massachusetts Immigrant and Refugee Advocacy Coalition.<sup>15</sup>

The US Citizenship and Immigration Services is overseeing the process of testing, refining and implementing the test that will ultimately come into effect in 2008. The new test, which is mandated by the Comprehensive Immigration Reform Act of 2006—enacted during another period in which anti-immigration sentiments swelled—requires immigrants to broadly ‘demonstrate an understanding of the English language, United States history and Government’. Most importantly, the new test will ask prospective citizens to identify common American ‘values and traditions’, as well as key people, events, ideas, documents and an understanding of citizens’ ‘rights and responsibilities’.<sup>16</sup>

Globally, changes in the requirements and prerequisites to citizenship in Western nations have followed a pattern roughly similar to that in the United States; namely, higher barriers—citizen tests included—often are erected as a direct reaction to the rise of anti-immigration sentiments. As in the United States, Canada imposed specifically anti-Chinese immigration barriers in 1885 and 1923. In 1919, paralleling the United States, Canada enacted literacy requirements—designed specifically to exclude Chinese immigrants who often did not speak English or French. Although Canada has a long history as a nation that welcomes immigrants (Canada’s citizenship requirements are even less onerous than those of the United States; one out of five Canadian citizens is foreign born), it has nonetheless made citizenship less attainable at various times in its past, using tests as one tool for this purpose. Additions to Canada’s Immigration Act in 1919 allowed for denial of citizenship to illiterate immigrants; in 1923, Canada introduced a ban on all immigration from China.

In Europe, citizenship tests are by and large more exacting than they are in the United States and Canada, reflecting a less favourable and less accommodating attitude towards immigration. This has

been most evident during the past 10–15 years, a period that has seen an explosive increase in immigration to Europe from Turkey, the former Soviet bloc nations, former colonial African nations, South-East Asia and the Middle East. Current or proposed tests in the United Kingdom, Germany, the Netherlands and France are all significantly more rigorous than previous ones or their US counterpart.

Especially revealing are tests introduced in 2006 by the German states of Baden-Württemberg and Hesse, and by the Netherlands. These tests seek to limit Muslim immigration as well as encourage the assimilation of those who do immigrate. The test in the state of Baden-Württemberg is administered exclusively to immigrants hailing from the fifty-seven states that comprise the Organization of the Islamic Conference.<sup>17</sup> It asks questions such as ‘Is it right that women obey their husbands, and for men to beat their wives when they are disobedient?’ and ‘If your adult daughter dressed like a German woman, would you try to prevent her from doing so?’ In nearby Hesse the citizenship test asks ‘If someone described the Holocaust as a myth or folktale, how would you respond?’<sup>18</sup>

In the Netherlands, would-be immigrants, prior to immigration, must take a ‘civic integration test’ that quizzes them about their command of the Dutch language, history and culture. As it is required only of non-Western immigrants, its critics contend that the test discriminates against Muslims. In addition, the Dutch pre-immigration test requires the viewing of a video entitled ‘Coming to the Netherlands’, which includes images of homosexual men kissing and of female nudity, offensive to traditionalists, especially Muslims. (In addition, imams of Dutch mosques must also attend a mandatory course on ‘Dutch law, including the rights of women and freedom of speech’.<sup>19</sup>) These new tests are typically accompanied by the introduc-

tion of new requirements for visas, stronger border controls and greater enforcements of regulations concerning work permits. These all constitute anti-immigration measures.

## Combining demanding tests with high-level and non-discriminatory immigration

So far, citizenship tests have been shown to serve primarily as immigration control measures rather than as significant tools for preparation for citizenship. Thus, at first there seems to be a clear trade-off: either lower the standards of these tests, or accept them as a toll of more limiting and more discriminatory immigration controls. However, one can make a case that there are compelling reasons to favour relatively thorough citizenship preparation—and hence more demanding testing—reasons to which I turn shortly. The question hence arises: How might thorough citizenship preparation be encouraged, using citizen tests to determine the extent to which such preparation has been achieved—*without the said negative effects on immigration?* (I take for granted in the following discussion that some increases in immigration are both essential and unavoidable, especially for nations such as Germany and Japan, whose populations are aging rapidly and whose birth rates are insufficient for replacement.) *The answer lies in providing immigrants with extensive citizenship preparation.*

Germany, the United Kingdom and the Netherlands have recently introduced some such classes. In Germany, for instance, as of January 2005 would-be citizens and as many as 60,000 foreigners who have already entered the country must attend 600 hours of German language instruction and an additional thirty hours of culture, history and civics classes.<sup>20</sup> Unlike the state-by-state citizenship tests, these nationwide classes were

introduced with the goal of integration; the civics components do not convey the 'take it or leave it' rhetoric that defines the Baden-Württemberg and Hesse exams. Overall,

The official rhetoric calls for 'intercultural competence' in which both immigrants and those already living in Germany make an effort to get to know and learn how to get along with each other. [In addition to the official government class,] a number of different types of programs are offered, ranging from intercultural training to advice on how to manage day-to-day life in Germany.<sup>21</sup>

Once in the Netherlands, to prepare for the main citizenship test, 'Newcomers are offered an integration programme by the municipality in which they live. This programme deals mainly with the language, but also with the way in which Dutch society functions'.<sup>22</sup> Immigrants in the Netherlands who choose not to take part in their integration programme must find alternative methods of preparation.

In the United States, such classes—especially the teaching of English and pre-test preparation—have been long provided largely by civil society bodies such as ethnic, religious and immigration groups. This is in contrast to Europe, where these classes are most often provided by the government. In both cases, the scope, amount and quality of the preparations provided are short of what is needed.

Some command of English is a prerequisite for gaining American citizenship. Various anti-immigration figures have argued that many immigrants, especially Hispanics, and in particular Mexicans, refuse to learn English.<sup>23</sup> In actuality, immigrants are very keen to learn English, yet there is a great shortage of English classes for adults and there are long waiting lines where they do exist. For instance, a case study by the Maryland Department of Education found that although one million adults statewide needed high school diplomas or English

language instruction, a shortage of teachers and funds was resulting in a waiting list of over 5,000 for ESL courses.<sup>24</sup> Such reports are common nationwide. The Colorado-based Bell Policy Center found that 'Colorado is a prosperous state, yet one that commits little or no public funding for adult basic education, English language instruction, workplace literacy and work force development programs.'<sup>25</sup> A similar report found that 'Adult education programs are struggling with state and federal budget cuts as they try to meet an increasing demand for English language classes throughout eastern Connecticut.'<sup>26</sup> In short, in the United States, the main issue is not immigrants' refusal to learn English or to prepare for citizenship, but the lack of means and resources to proceed. The same holds for all other preparations for citizenship. For example, 600 hours may well not suffice to prepare immigrants from different cultures for German citizenship. In addition, the classes are provided by personnel who often have few qualifications.<sup>27</sup> More generally, if much more thorough citizenship preparation were to be provided, the test would become less onerous, less discriminatory and less anti-immigration. For those subject to these tests, the key question is not merely how much more taxing the new US and European tests are in content and format but, rather, whether the introduction of new and more demanding tests is accompanied by more and better resources for preparation. I add 'better' because informal reports from Germany suggest that those who conduct the classes for immigrants are poorly prepared for the test.<sup>28</sup> (Martin Buber held that teaching adults requires different skills than teaching children, and set up a special school for teachers of adults in Jerusalem, just as mass immigration to Israel was increasing, shortly after the state of Israel was established.) Hence the scope of the available preparation should be measured not merely by the number of hours

of instruction each immigrant is entitled to receive, but also by the quality and relevance of the instruction, class sizes and other such determinants of the quality of educational inputs.

## Citizenship tests for alternative kinds of citizenship

Implicit in all the citizenship tests are distinct conceptions of what a good citizen makes. There is a very rich literature on what citizenship means and ought to mean, which cannot be reviewed here.<sup>29</sup> For the purpose at hand it suffices to list the differences among four concepts of citizenship—and the tests that reflect these conceptions and serve their implementation. (Because existing tests are not explicitly designed to reflect any particular political philosophy and often are the result of political give-and-take, they typically reflect a mixture of concepts of the requirements of citizenship, but still tend to lean towards one pure type or another.)

The *libertarian* approach to citizenship, in its purest form, views it as a status in a minimal state and accordingly limits what citizens' duties entail and the extent to which they are expected to participate in the state.<sup>30</sup> Citizens should be able to vote (if they so desire), pay taxes (as few as possible) and obey the laws (which should be kept to a small number). Related citizenship tests are not only be limited in scope but also largely cognitive; that is, they seek to establish people's knowledge of how to vote, what taxes are due and the content of basic laws, but little else. In short, such 'thin' citizenship requires but thin tests and *relatively* little preparation. (The statement that libertarian citizenship is compatible with the said citizenship test should not be read as implying that all libertarians favour either. Some, such as libertarian economist Julian Simon, oppose limits on citizenship and hence oppose all tests. They favour open bor-

ders. Simon argued that other than a demonstrable 'clear-and-present danger', there was no credible economic or social reason to limit immigration in any shape or form.<sup>31</sup>)

Another concept of citizenship essentially reflects a contemporary *liberal* precept.<sup>32</sup> It focuses the questions on whether people are aware of their rights. Liberal citizenship may be understood as 'a set of rights enjoyed equally by every member of the society in question', writes T. H. Marshall.<sup>33</sup> Liberal citizenship tests determine whether future citizens are aware of their right to free speech, and that it cannot be denied. They seek to ensure that citizens know that they are free to form any associations as they wish, practice their religion and so on. Writing on liberal citizenship, philosopher John Rawls asserts that citizens of a liberal state are political entities 'whose essential nature is most fully realized in a democratic society in which there is widespread and vigorous participation in political life'.<sup>34</sup> Because immigrants are often unaware of their rights and what is to be done when these rights are violated, preparation for liberal citizenship needs to be quite extensive.<sup>35</sup> Libertarians are of course also concerned with rights, but they seek to protect citizenship first and foremost by minimising the scope of the government; liberals tend to be accepting of a thicker government and hence need to be even more concerned than libertarians to ensure that a strong support of rights prevents the government from exceeding its legitimate authority.

Regarding the civics requirements that have sprung up in Germany since 2000, Hartnell reports, Christian Joppke notes that there is 'nothing specifically "German" about the culture that immigrants were to be asked to share'. He writes that the 'only non-procedural element of this culture (next to the language requirement that no state qua state can do without) was [the CSU's] commit-

ment to "Christian-occidental culture" which implicitly excluded Islam'. On this basis, Hartnell writes, 'Joppke argues that the only "exclusionary potential" inherent in Germany's "civic-nationalist turn" is to "thicken" the liberal-democratic integration requirement and to make the liberal state for liberal people only'.<sup>36</sup>

Some liberals go a step further and argue against all but the most basic impediments to naturalisation (although for different reasons than libertarians). In a response to Noah Pickus, Joseph Carens posits that 'as a matter of fundamental justice, anyone who has resided lawfully in a liberal democratic state for an extended period of time (e.g. five years or more), ought to be entitled to become a citizen if he or she wishes to do so'.<sup>37</sup> At the heart of this line of reasoning lies 'the moral priority of civil society in relation to political society'. Once someone has lived in a country for a sufficient amount of time, his or her membership in that country's civil society outweighs his or her lack of political knowledge. This liberal view holds that while normative values such as loyalty, patriotism and identity should be encouraged, the state should not 'impose such an expectation' on immigrants but, rather, let those values come with time.<sup>38</sup>

A *neo-communitarian*<sup>39</sup> concept of citizenship view citizens as both right-bearing individuals and as persons who must assume responsibilities toward each other and toward the community at large. These communitarians draw a distinction between state and society (or community) and view the nation as a community invested in a state. Hence for the neo-communitarian, a citizen has responsibilities not merely toward the political entity (e.g. obeying the state's laws), but also toward the national community (e.g. supporting its core of shared values). Citizenship tests that are suitable from a neo-communitarian perspective must encompass normative commitments and not

merely knowledge. They should test not just knowledge of one's rights, but also a readiness to assume responsibilities.

Preparation for neo-communitarian tests would include considerable efforts towards acculturation, but not the fostering of a melting pot or assimilation in the sense that it would encourage eradication of *subcultures* of various immigrants. Generation after generation of immigrants who were first viewed as undermining the American society and its core of shared values have become an integral part of it, including Jewish immigrants and immigrants from Catholic countries (especially Ireland and Poland), without giving up their subcultures and ethnic identities. With regard to immigration to the United States, I join with those who see no compelling reasons to try to assimilate immigrants into one indistinguishable American blend. There is no need for Greek-Americans, Polish-Americans, Mexican-Americans or any other group to see themselves as plain Americans without any particular distinction, unique ethnic history or subculture. As long as they accept the core of shared values and institutions, they are free to diverge on other matters.<sup>40</sup> Hence a proper citizenship test should establish both whether they are acculturated (on some key fronts) and are fully aware of their right to keep their differences in many other areas.

Finally, *authoritarian communitarians* view citizenship as being an integral part of the whole, like a cell within an organic body. They hold that to maintain social harmony, individual rights and political liberties must be curtailed. Some seek to rely heavily on the state to maintain social order (for instance, leaders and champions of the regimes in Singapore and Malaysia), and some on strong social bonds and moral culture (a position widely held in Japan). Authoritarian communitarians also maintain that the West's notion of liberty actually amounts to 'anarchy'; that strong

economic growth requires limiting freedoms; and that the West uses its idea of legal and political rights to chastise other cultures that have inherent values of their own.

Often, nations that ascribe to such a view of citizenship rely much more heavily on other means of immigration control than on demanding citizenship tests. For instance, Singapore has taken extreme measures to restrict the right of immigrants to citizenship. It has, for example, shipped Malaysian women across the border before delivery of their children to ensure that their children will not have a born right to citizenship in Singapore. In the 1980s in Singapore, 'Regulations prohibited their [female immigrants from neighbouring countries] marrying without prior official permission and required women to be tested for pregnancy every six months—measures intended to make it difficult for them to attain Singaporean residence or citizenship by becoming the spouse or parent of a citizen.'<sup>41</sup> The Singapore Ministry of Foreign Affairs currently states that all pregnant women travelling to Singapore must obtain a visa and must submit 'An undertaking letter stating that you will not claim Singapore citizenship should the child be born in Singapore.'<sup>42</sup>

## Actual tests: varying composites

To reiterate, none of the citizenship tests currently in use have been drafted to adhere to any of the conceptions of four types of citizenship just listed. Indeed, often one and the same test reflects various strands, although the tests tend to lean toward one conception of citizenship or another. For instance, the current American test is thin and largely cognitive. Thus, it asks applicants the colours of the flag and what the 4th of July denotes, but does not even try to assess if the responders have developed any commitments to individual rights or to

shared American values. One could know what the colours the flag are and when Independence Day is celebrated without having acquired any commitment to the state or the society at large. Furthermore, the current American test asks very little about rights. In short, it is basically a thin, libertarian test.

The new British citizenship test introduced in 2003 contains many questions that stress basic knowledge, such as 'Which two out of these numbers can be used to dial the emergency services?' and 'Do people tend to live in the cities or in the country?'<sup>43</sup> The test also establishes whether a person has some familiarity with British history (it asks questions on the Magna Carta and the UK's Parliament) and social knowledge (such as when the Saints' days occur). It also tests applicants on some aspects of their rights as British citizens: for example, 'Who has the right to vote and at what age?' and 'Do women have equal rights and has this always been the case?'<sup>44</sup> To a limited extent, it also touches on the topic of citizens' responsibilities, asking 'What rights and duties do UK citizens have?' The British test also contains a neo-communitarian element when it seeks to tease out whether a person is ready to engage others in a proactive rather than an antisocial or violent manner: 'What should you do if you spill someone's pint in a pub?'<sup>45</sup> The correct answer in this case is 'Offer to buy them another.'

The Dutch use two tests. The test to become a naturalised Dutch citizen is similar to the British one, in that it asks about basic knowledge of Dutch language, culture, history and civics. A second test, the pre-arrival exam mentioned earlier, incorporates the controversial 'Coming to the Netherlands' video, with its sexually explicit scenes as well as depictions of crime-ridden immigrant ghettos in the Netherlands. It focuses largely on acceptance of key values, but mostly those that are related to rights (e.g. tolerance, the rights of women and free-

dom of expression) and not to shared responsibilities (such as a willingness to serve in the armed forces and fight for one's new nation).

The new American citizenship test, which is being field tested in ten cities, is expected to be introduced on a nationwide level in 2008. The new tests still contains numerous factual questions, such as how old one has to be to serve as the president and how many states are there in the union.<sup>46</sup> At the same time, the new test is much more neo-communitarian than the old one, in that it quizzes applicants not only on their knowledge of their rights as Americans, but also on their responsibilities. Among the questions about rights are 'Name two rights that are only for United States citizens' and 'What are inalienable rights?' The eligible answers for the first question are the right to apply for a federal job, the right to vote and the right to run for office. The second question can be answered with 'Individual rights that people are born with.' Some questions concern responsibilities to the state: 'Name one responsibility that is only for United States citizens' and 'Name one promise you make when you say the Oath of Allegiance.' Possible answers for the first question are the responsibility to vote and to serve on a jury. The second question can be satisfied with one of the following promises: to give up loyalty to other countries, to defend the Constitution, to obey the laws, to serve in the military, to serve the nation if needed and to be loyal to the United States. To the extent that the new test incorporates dialogue about civic responsibility, it echoes the intent of some of the United States' earliest naturalisation courses (as opposed to tests), which Noah Pickus found were designed to 'inculcate a basic conceptual understanding of democratic principles' and to 'emphasiz[e] the importance of political and social participation'.<sup>47</sup> Emilio Gonzalez, Director of the US Citizenship and Immigration Ser-

vices, holds that the new test seeks 'to inspire immigrants to learn about the civic values of this nation'.<sup>48</sup> However, the test contains no questions about volunteerism, communal service, how to be a good neighbour, or even responsibility towards one's children and elders, not to mention towards those most in need. It has no questions similar to the British one about avoiding violence.

If the kind of citizenship tests used is not aligned with the governing conception of citizenship, testing will tend to undermine rather than help implement that conception. Thus if a nation seeks that all its new citizens will be tolerant but it tests only for basic knowledge, more and more citizens will not abide by the governing norms. Whether one favours or opposes such 'subversive' citizenship tests depends on the ways in which one values the governing conception of citizenship. Thus, one may favour libertarian tests for Singapore but not purely knowledge-based ones for well-established democracies.

In nations, however, if the tests are not to act as anti-immigration and discriminatory measures, they must be coupled with suitably extensive and qualified opportunities for citizenship education and for test preparation. The limited data briefly cited here strongly suggest that neither is currently the case in any of the nations under study.

## Acknowledgement

I am indebted to Jon Ehrenfeld for research assistance on this article.

## Notes

- 1 J. Hollifield, 'The emerging migration state', *The International Migration Review*, vol. 38, no. 3, 2004, pp. 885–912. See p. 890.
- 2 N. Pickus, *True Faith and Allegiance: Immigration and American Civic Nationalism*, Princeton, NJ, Princeton University Press, 2005. See p. 123.
- 3 B. Arnoldy, 'US to unveil new citizenship

- test', *The Christian Science Monitor*, 17 November 2006, p. 3.
- 4 Y. Abraham, 'A test of principles, not presidents; US will redesign citizenship exam', *The Boston Globe*, 22 January 2006, p. A1.
  - 5 Ibid.
  - 6 Illinois Coalition for Immigrant and Refugee Rights, 'Take action: stop the "second wall" blocking citizenship', newsletter, 13 October 2006; accessed 29 November 2006, <http://www.icirr.org/newsletters/oct13alert.htm>
  - 7 K. Connolly, 'Loyalty test for Muslims draws fire: German exam for citizenship called "racist"', *The Calgary Herald*, 31 December 2005, p. A15.
  - 8 J. Higham, 'Origins of immigration restriction 1882–1897', *The Mississippi Valley Historical Review*, vol. 39, no. 1, 1952, pp. 77–88. See p. 81.
  - 9 J. Higham, *Strangers in the Land*, New York, Atheneum, 1970. See p. 103.
  - 10 Ibid., p. 103.
  - 11 Writing on the literacy test, Cheryl Shanks argues that arguments made for the literacy test as an upholder of good citizenship were spurious: 'The test's real purpose, however, was clearly to exclude "undesirables" emigrating from southeast Europe; the test's proponents did not bother to pretend otherwise.' Using the test as a 'covert means of numerical and racial restriction' allowed anti-immigrant legislators to further restrict immigration above and beyond the already existing quotas. See C. Shanks, *Immigration and the Politics of American Sovereignty, 1890–1990*, Ann Arbor, The University of Michigan Press, 2001, p. 34.
  - 12 J. Viallet, 'A brief history of U.S. immigration policy', in *The Politics of Immigration*, ed. A. Babkina, Huntington, NY, Nova Science Publishers, 2001. See p. 14.
  - 13 Ibid., p. 14.
  - 14 J. Miller and W. Muldoon, 'Citizenship for granted: how the INS devalues naturalization testing', Center for Equal Opportunity, 1996; accessed at <http://www.ceousa.org/citizen.html>
  - 15 Arnoldy, 'US to Unveil New Citizenship Test'.
  - 16 United States Senate, S.2611 Comprehensive Immigration Reform Act of 2006.
  - 17 D. Smith, 'Failing the tolerance test', *Expatica Germany*, 2006; accessed at [http://www.expatica.com/actual/article.asp?subchannel\\_id=52&story\\_id=26707](http://www.expatica.com/actual/article.asp?subchannel_id=52&story_id=26707)
  - 18 A. Tzortzis, 'In Europe, quizzes probe values of potential citizens', *The Christian Science Monitor*, 4 April 2006, p. 1.
  - 19 H. Ghafour, 'For Dutch Muslims, there's a chill in the air', *The Globe and Mail (Canada)*, 19 March 2005, p. F3.
  - 20 H. Hartnell, 'Belonging: citizenship and migration in the European Union and in Germany', *Berkeley Journal of International Law*, vol. 24, no. 1, 2006, pp. 330–400. See p. 394.
  - 21 Ibid., p. 395.
  - 22 Immigratie-en Naturalisatiedienst, 'Planning to stay in the Netherlands: preparation [sic]', 2006; accessed at [http://www.ind.nl/en/verblijfwijzer/verblijfwijzer\\_mijnsituatie.asp?proc=komen&procedure=Naturalisatietoets&procedurestapnaam=Preperation&land=&duur=1&lang=nl](http://www.ind.nl/en/verblijfwijzer/verblijfwijzer_mijnsituatie.asp?proc=komen&procedure=Naturalisatietoets&procedurestapnaam=Preperation&land=&duur=1&lang=nl)
  - 23 See chapter 9 of S. Huntington, *Who Are We?: The Challenges to America's National Identity*, New York, Simon and Schuster, 2004.
  - 24 N. Trejos, 'Report calls adult-ed programs inadequate', *The Washington Post*, 23 February 2006, p. T03.
  - 25 R. Brand and J. Kelley, 'Poverty, lack of education linked', *Rocky Mountain News*, 21 April 2004, p. 1B.
  - 26 G. Braccidiferro, 'First words to learn in a new land: crowded classrooms and waiting list', *The New York Times*, 15 December 2002, p. 14.
  - 27 R. Ohlinger, Personal communication at Diversity Within Unity: Rights and Responsibilities of Immigrants and their New Homelands, Brussels, 2006.
  - 28 Ibid.
  - 29 Of particular interest with regard to the history of citizenship in America, see Pickus, *True Faith and Allegiance*. An excellent summary of the conceptual overviews of citizenship, its form and ideologies can be found in K. Faulks, *Citizenship*, London, Routledge, 2000; and R. Smith, *Stories of Peoplehood: The Politics and Morals of Political Membership*, Cambridge, Cambridge University Press, 2003. For a comparison of liberal, libertarian and republican

- models of citizenship, especially with regard to pluralism, see also D. Miller, 'Citizenship and pluralism', *Political Studies*, vol. 43, no. 3, 1995, 432–50.
- 30 For more on libertarian citizenship, especially the rights and responsibilities of citizens of a libertarian state, see chapters 3 and 7 of D. Boaz, *Libertarianism: A Primer*, New York, The Free Press, 1997.
- 31 J. Simon, 'Are there grounds for limiting immigration?' *Journal of Libertarian Studies*, vol. 13, no. 2, 1998, pp. 137–52. See p. 152. See also J. Simon, *The Economic Consequences of Immigration*, Oxford, Blackwell, 1989.
- 32 On liberal citizenship, see T. Spragens, *Civic Liberalism: Reflections on our Democratic Ideals*, Lanham, MD, Rowman & Littlefield, 1999; and M. Kenny, *The Politics of Identity: Liberal Political Theory and the Dilemmas of Difference*, Cambridge, Polity, 2004.
- 33 T. H. Marshall, *Citizenship and Social Class*, London, Pluto Press, 1992 (first published 1950). See p. 24.
- 34 J. Rawls, *Political Liberalism*, New York, Columbia University Press, 1993. See p. 26.
- 35 Libertarians are of course also concerned with rights, but they seek to protect citizenship first and foremost by minimising the scope of the government; liberals tend to be accepting of a thicker government and hence need to be even more concerned than libertarians to ensure that a strong support of rights prevents the government from exceeding its legitimate authority.
- 36 Hartnell, 'Belonging', p. 392.
- 37 J. Carens, 'Why naturalization should be easy: a response to Noah Pickus', in *Immigration and Citizenship in the 21st Century*, ed. N. Pickus, Lanham, MD: Rowman & Littlefield, 1998. See p. 143.
- 38 *Ibid.*, p. 146.
- 39 I include myself in this category. See A. Etzioni, 'Das Prinzip des Mosaiks', *Süddeutsche Zeitung*, 8 April 2006, p. 15; A. Etzioni, 'Droits et devoirs de l'immigré', *Courrier International*, vol. 814, 2006, pp. 8–14; and A. Etzioni, *The New Golden Rule: Community and Morality in a Democratic Society*, New York, Basic Books, 1996.
- For more on communitarianism, see 'The responsive communitarian platform'; [http://www.gwu.edu/~ccps/platform\\_text.html](http://www.gwu.edu/~ccps/platform_text.html). For a more wide-ranging comparison of liberal versus communitarian models of citizenship, see S. Mulhall and A. Swift, *Liberals and Communitarians*, Oxford, Blackwell, 1992.
- 40 'As I see it, the image of a mosaic, if properly understood, best serves the search for an intercommunity construction of bounded autonomy suitable to a communitarian society. The mosaic is enriched by a variety of elements of different shapes and colors, but it is held together by a frame and glue . . . These distinct communities recognize that they are integral parts of a more encompassing whole.' (Etzioni, *The New Golden Rule*.)
- 41 Library of Congress Country Studies, 'Singapore: population, vital statistics and migration', 2006; accessed at <http://lcweb2.loc.gov/frd/cs/sgtoc.html>
- 42 Singapore Ministry of Foreign Affairs, 'Visa/permit regulations for pregnant women', 2006; accessed at [http://app.mfa.gov.sg/generator/asppages/washington/wstvisa\\_pregnancy.asp](http://app.mfa.gov.sg/generator/asppages/washington/wstvisa_pregnancy.asp)
- 43 D. Casciani, 'UK "citizenship test" unveiled', *BBC News* (world edition, online), 2003; accessed at [http://news.bbc.co.uk/2/hi/uk\\_news/2713349.stm](http://news.bbc.co.uk/2/hi/uk_news/2713349.stm)
- 44 British Citizenship: Life in the UK Test Website, 'What You Need to Know', 2005; accessed at [http://www.lifeintheuktest.gov.uk/htmlsite/self\\_10.html](http://www.lifeintheuktest.gov.uk/htmlsite/self_10.html)
- 45 A. Mather, 'What does it mean to be British?' *Evening News* (Edinburgh), 2 November 2005, p. 18.
- 46 United States Citizenship and Immigration Services, 'Questions and answers for new pilot naturalization exam', 2006; accessed at <http://www.uscis.gov/portal/site/uscis/menuitem.5af9bb95919f35e66f614176543f6d1a/?vgnnextoid=dcf5e1df53b2f010VgnVCM1000000ecd190aRCRD>
- 47 Pickus, *True Faith and Allegiance*, p. 123.
- 48 H. Chmela, 'New citizens will need deeper knowledge', *The New York Times*, 1 December 2006, p. A26.