

IMMIGRANT CITIZENSHIP IN THE UNITED STATES AND CANADA: EXPLAINING THE DIFFERENCE¹

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ABSTRACT

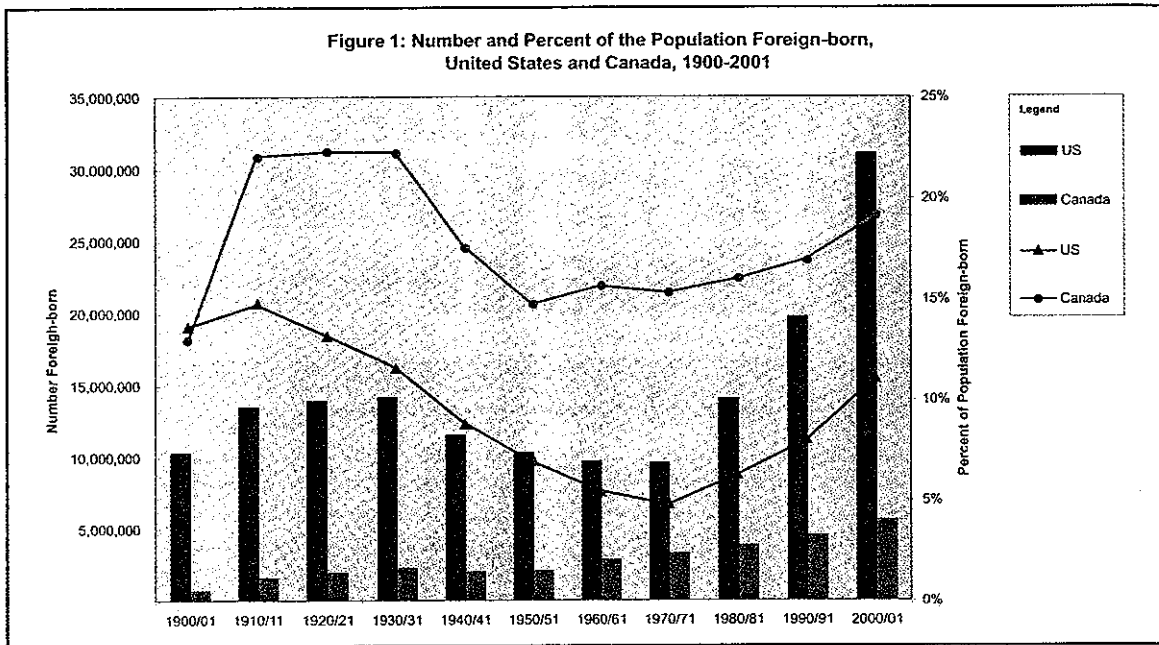
This article lays out a surprising divergence in the trend of immigrant citizenship in the United States and Canada. While the two countries had very similar patterns of immigrant citizenship up to the early 1970s, over the last three decades immigrants in Canada have become more likely to acquire Canadian citizenship while compatriots in the US often fail to do so. The cross-national difference cannot be explained by differences in the costs and benefits of citizenship acquisition or the rules governing citizenship, and taking into account the differences in the immigrant streams in the two countries only eliminates a small portion of the gap. This article instead argues that, while Canadian government policy around settlement and multiculturalism facilitates immigrants' citizenship, in the United States the predominant view on immigration is one of security and control. Canadian policy helps immigrants apply for citizenship, and it makes citizenship more attractive to them by highlighting a sense of standing and a relationship to the Canadian state.

More than half a million people became U.S. citizens in 2004. Ask them why they decided to pledge allegiance to the United States and they will tell you they want the security citizenship brings. Without it, you can be subject to mandatory detention and automatic deportation for even relatively minor crimes. Or they will say that they want to exercise political rights. Except for a few localities in the United States, citizenship is required for voting or running for office. Some new citizens might note that access to certain jobs in the public sector or defense industry requires citizenship. Citizenship also determines eligibility for various public benefits since the 1996 Welfare Reform Act (officially, the U.S. Personal Responsibility and Work Opportunity Reconciliation Act). Finally, many will tell you that the United States is their adopted home. Becoming an American makes it official.

The costs of becoming an American citizen seem small. Lack of citizenship does not offer protection from the draft, as many immigrant men found out during the Vietnam conflict, and non-citizens must pay taxes like everyone else. The naturalization oath that all would-be adult citizens must swear requires a renunciation of past allegiances, but in practice U.S. citizens can hold multiple passports. Getting citizenship does not necessarily mean losing one's former nationality.

Why then do so few immigrants in the United States take out U.S. citizenship? In 2004, more than 34 million foreign-born individuals lived in the United States. Only 38 percent were U.S. citizens, less than half the proportion in 1950, when almost four out of every five immigrants had sworn to uphold the American constitution. In countries with significant ethno-racial diversity such as the United States and Canada, the glue that binds strangers is common membership, or citizenship, in a political body. When immigrants do not acquire citizenship, a sense of shared enterprise is undermined, as are the institutions of democratic government.

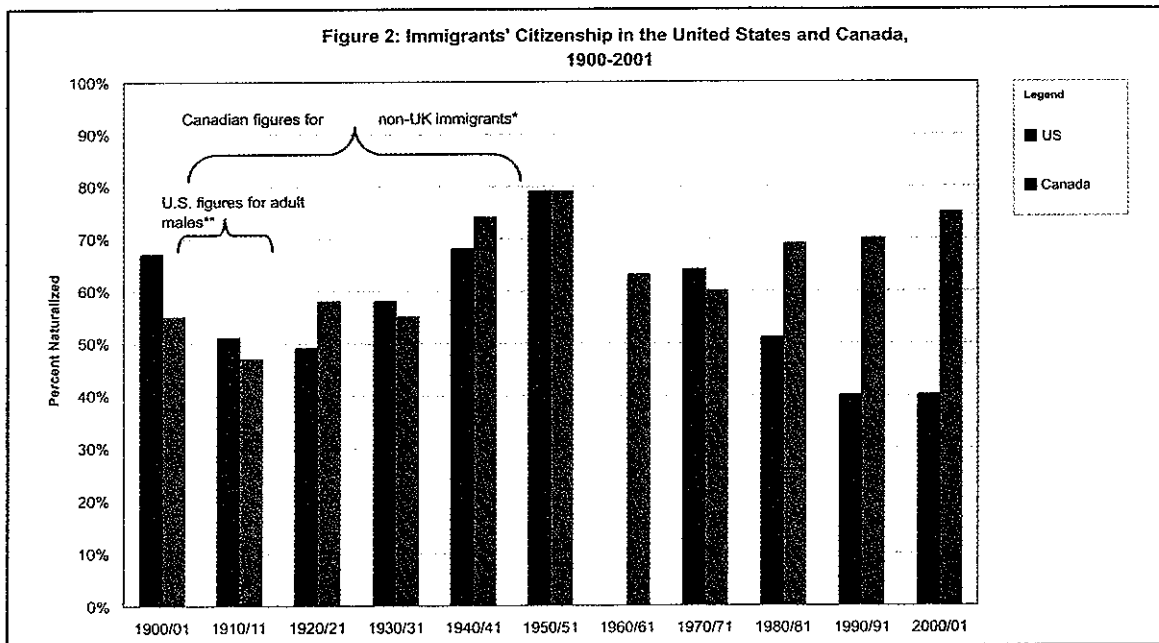
The decline in immigrant citizenship is all the more startling if we consider America's neighbor to the north. Canada, like the United States, is a country built on successive waves of immigration. In 2001, nearly one of every five Canadian residents had been born in another country. Indeed, in proportion to its population, Canada takes in about three times as many immigrants as the United States (See Figure 1). Strikingly, the overwhelming majority of these foreign-born residents, 72% in 2001, had acquired Canadian citizenship. For citizenship levels in the United States to mirror those in Canada, eleven and a half million people would need to get American citizenship overnight.



Source: U.S. Census; Canadian Census.

	1900/01	1910/11	1920/21	1930/31	1940/41	1950/51	1960/61	1970/71	1980/81	1990/91	2000/01
US	10,341,276	13,515,886	13,920,692	14,204,149	11,594,896	10,347,395	9,738,091	9,619,302	14,079,302	19,767,316	31,107,889
Canada	699,500	1,586,961	1,955,725	2,307,525	2,018,847	2,059,911	2,844,263	3,295,535	3,843,335	4,566,300	5,647,120
US	14%	15%	13%	12%	9%	7%	5%	5%	6%	8%	11%
Canada	13%	22%	22%	22%	18%	15%	16%	15%	16%	17%	19%

Census Data for Number and Percent of Total Population Foreign-Born in the United States and Canada, 1900-2001



Source: U.S. Census; Canadian Census. *Canada used British subjectship before independent citizenship in 1947, thus British migrants had status equal to the native-born.

**Before 1920, the US Census only collected citizenship data for men

	1900/01	1910/11	1920/21	1930/31	1940/41	1950/51	1960/61	1970/71	1980/81	1990/91	2000/01
US	67%	51%	49%	58%	68%	79%	—	64%	51%	40%	40%
Canada	55%	47%	58%	55%	74%	79%	63%	60%	69%	70%	75%

Census Data for Adult Naturalization Levels in the United States and Canada, 1900-2001

For most of the twentieth century, immigrant citizenship in the United States and Canada looked remarkably similar. (See Figure 2). However, beginning in the 1970s, as both countries welcomed “new” immigration from Asia, the Caribbean and Latin America, citizenship trajectories parted course. Many would have predicted higher citizenship in the United States, given a longer history of civic nationalism and arguably a stronger assimilationist impulse. In Canada, recurrent crises of national cohesion around Quebec independence and, in the eyes of some, a divisive policy of official multiculturalism should hinder immigrants’ political integration.

Many of the benefits of Canadian citizenship – political rights, access to certain jobs, protection against deportation – are the same as in the United States. If anything, citizenship offers more in the United States. Access to Canadian social programs is available to all non-citizen permanent residents; this is not always the case in the United States. An immigrant who wants to sponsor a family member to the United States has an easier time if he or she is a citizen – citizenship provides no comparable advantage in Canada. Given fewer benefits, why do so many foreigners take up Canadian citizenship while compatriots down south fail to become American?

I find that much of the difference stems from the relative “warmth of the welcome” accorded to immigrants in Canada and the United States. In the United States, immigration policy largely starts and ends at the border. Government attention and resources revolve around border control; subsequent processes of integration are considered outside the purview of the state. In Canada, the government has adopted a more interventionist stance, providing public funds for the practical business of settlement and integration, and adopting a policy of official multiculturalism recognizing immigrant-generated diversity. Such policies increase immigrants’ ability to take out citizenship and affect how interested they are in doing so. Minor variations in citizenship regulations and processing, as well as differences in the types of immigrants that go to Canada and the United States, also play a role in the citizenship gap, but less than we might think.

The Legalities of Citizenship

Those who do not have American or Canadian citizenship at birth – by being born in the country or born to citizen parents overseas – must acquire it through naturalization. Naturalization procedures are remarkably liberal in both countries. Would-be citizens must prove a number of years of legal residence (three in Canada, generally five in the United States); they must demonstrate basic language ability (English in the United States, English or French in Canada); they must show some knowledge of the country, its history and government; they must pay a fee (\$200 in Canada, \$320 in the United States) and, to use the American phrase, they must demonstrate “good moral character.”² In both countries, criminal convictions constitute grounds on which to refuse citizenship.

Refusal rates appear similar. Through the 1960s to the 1980s, the Immigration and Naturalization Service (INS) refused about 2% of applications for naturalization, while 3% were formally rejected in Canada. In the 1990s, after

some politicians adopted anti-immigrant platforms in the United States, refusal rates climbed to 15% as many immigrants applied for citizenship without first having fulfilled the residency requirement. In Canada, refusals stood at about 10% of the total.

The Long Gray Welcome

If key naturalization requirements do not differ, the attitude and administration of citizenship does seem more welcoming in Canada. David North called the naturalization process under the former Immigration and Naturalization Service the “long, gray welcome.” Forms are legalistic, unattractive and difficult to understand. Lines are long and, in the 1990s, some immigrants had to wait two or three years for their application to be processed. Citizenship services take second place to border enforcement within the federal bureaucracy. This was true when naturalization fell under the INS, and continues today with U.S. Citizenship and Immigration Services housed in the Department of Homeland Security. In the 2005 fiscal year, immigration enforcement activities are slated for a 10% budget increase, for an additional \$357 million in funding. In contrast, citizenship and immigration services will receive only an extra \$58 million, an increase of less than four percent. According to INS Commissioner Doris Meissner, “[T]he dominant culture of the agency... [is] rooted in a view of immigration as a source of security and law enforcement vulnerability more than of continuing nation building.”

Negative perceptions of the immigration bureaucracy make immigrants more reluctant to apply for citizenship, even if many have a positive experience once they actually apply. Such negative perceptions can also be extrapolated to other government agencies, undermining newcomers’ confidence in their welcome by government and political actors. Citizenship is rendered less attractive.

Citizenship and Immigration Canada (CIC), the Canadian counterpart to USCIS, has also had problems with timely processing, but overall it has worked more on immigrant outreach and citizenship promotion. A senior official at CIC explained during an interview, “The Canadian policy is that we are a country of immigration. The only way an immigrant can influence how the country is run, to do that, you need to vote. And you can only vote if you become a citizen. The Citizenship Act ensures the facilitation of citizenship, so that immigrants can exercise their voting capacity. That is the main policy thrust.” Instead of a strong mandate toward enforcement, CIC has developed various settlement policies. Initially run through the public service, these are now almost entirely administered through local community organizations funded by government grants. In 2003-04, \$173 million went to language training, job counseling, translation and other settlement services throughout English-speaking Canada.³ In the United States, only officially designated refugees have access to such federal programs.

The upshot of these differences is that immigrants in Canada become more interested and able to apply for citizenship, and they do so sooner than in the United States. In 1970/71, about two third of foreigners who had lived for eleven to fifteen years in Canada or the United States held

the citizenship of their adopted country. Twenty years later, among those with a similar number of years of residence, only two of five in the United States, but more than three quarters in Canada, had naturalized. Significantly, citizenship regulations did not change appreciably over this period.⁴

Illegal Immigration and Countries of Origin

Unauthorized migration, by individuals crossing the border clandestinely or overstaying temporary visas, became a significant political issue in the United States during the 1980s and 1990s. Reasonable estimates of the unauthorized population range from seven to 11 million in 2000. Of those, approximately 55% are thought to originate from Mexico. Since only legal permanent residents can apply for citizenship, a large population of undocumented migrants drives down aggregate naturalization figures.

Canada is also home to illegal immigrants, most of whom overstay tourist visas. Recent news reports put the number at about 200,000, but lacking any reliable estimates from government or the academic community, this figure is largely speculative. It is certain, however, that illegal migrants constitute a smaller percentage of the overall foreign-born population than in the United States.

The origins of immigrants to Canada and the United States also differ. Following massive immigration to the United States from 1880-1920, Congress shut the door to immigration in the 1920s, letting in only relatively small numbers of Europeans and Canadians for permanent residency, or Mexicans for temporary work. In the 1950s, 53% of those granted permanent residency came from Europe while only 6% and 0.6% came from Asia or Africa, respectively. The 1965 Immigration (or Hart-Cellar) Act eliminated national origin quotas and raised the overall ceiling on admissions. By the 1990s, Europeans accounted for only 15% of legal immigrants to the United States, while those from Asia or Africa represented 31 and 4 percent of the total, respectively. Hispanic immigration, primarily from Mexico, but also from Central and South America and the Spanish-speaking Caribbean, makes up the bulk of the contemporary U.S. immigration.

Canada also ended discriminatory selection criteria during the 1960s. As late as 1966, two thirds of all immigrants to Canada came from just five countries: the United Kingdom, Italy, the United States, Germany or Portugal. By 2000, Europeans made up just 19% of immigrant admissions, while the majority of immigrants, 51%, came from Asia and the Pacific. Another 18% hailed from Africa and the Middle East, and only 9% came from Central and South America. Immigration to Canada is much less Hispanic, and much more Asian, than migration to the United States.

These differences matter because people from different countries have different tendencies to take out citizenship. Some researchers believe that shared cultural traits, such as the civic culture immigrants bring with them, influence naturalization decisions. Others suggest that immigrants from different countries face different decision-making contexts over the costs and benefits of naturalization. For example, Canadian and Mexican im-

migrants in the United States might be less likely to naturalize because they imagine that the chance for return to their homeland is high.

Differences in citizenship among origin groups affect aggregate naturalization levels. The very large Mexican-born population in the United States – almost 30% of all foreign-born residents in 2000 – dwarfs the community in Canada, which constituted less than a percentage point in 2001. Mexicans have amongst the lowest naturalization levels of any group in the United States, and they make up a larger proportion of the illegal population, a group barred from citizenship. The large Mexican population consequently drives down aggregate U.S. citizenship levels. In contrast, many Asian groups have relatively high citizenship levels. Significant Asian migration increases the level of citizenship in Canada.

Yet unauthorized migration and differences in country of origin cannot explain away the puzzle of diverging citizenship trajectories. The proportion of immigrant citizens increases to 48% in 2000 if we exclude Mexican migrants and those who do not fulfill residency requirements from our calculations. However, a similar adjustment to the Canadian figure increases it even more, to 84% in 2001. Further, when we compare citizenship levels for immigrants born in the same country, naturalization is consistently higher in Canada than in the United States across all immigrant groups.

The “Quality” of Immigrants and Immigration Policy

Certain people are more likely to apply for citizenship than others. Not surprisingly, given language and civics requirements, those with better English skills (or, in Canada, French) and more education are more likely to naturalize.⁵ Some Americans consequently wonder whether the recent drop in immigrant citizenship reflects a decline in the “quality” of newcomers to the United States. Are today’s newcomers too uneducated, unmotivated or otherwise lacking in the civic virtues needed for citizenship? Such charges come not only from the far right, but also from celebrated scholars such as Samuel Huntington.

Both Canada and the United States administer mixed immigration systems that accord entry based on skills and resources, family ties or the need for asylum. The relative proportion of these three categories varies, however. In the late 1990s, between two-thirds and three quarters of legal immigrants in the United States acquired their status through family ties – a relative already living in the United States sponsored their application to migrate. Under the current U.S. preference system, about 20% of numerically limited visas are given based on employment. Refugees accounted for eight to 16 percent of admission in the 1990s.

Canada depends more heavily on “independent” migrants, those with no family ties to Canada, but who can show that their skills or resources (such as investment capital) are needed in the Canadian economy. Since the mid 1970s, selection as an independent migrant is based on the ‘point system.’ Potential migrants receive points for job skills, language ability, age and other personal characteristics. If an applicant’s total points surpasses the government-set threshold, that person can be granted an

immigrant visa. In the second half of the 1990s, a bit over half of all immigrants arrived as independent migrants (a figure which includes the dependents of the principal applicant), 25 to 30 percent entered under family reunification provisions and about 13 to 17 percent came as refugees or special admissions. Assuming that independent migrants are more likely to possess higher education and better language skills, might the higher proportion of economic migrants in Canada account for citizenship differences?

Probably not. Over the period that citizenship levels declined in the United States, the average level of education among newly arriving immigrants increased, implying that these newcomers should find naturalization easier than those who came before. Jeffrey Reitz has shown that among non-Hispanic migrants to North America, the more educated move to the United States. For many would-be migrants, Canada is a second-best option. We might expect that those who realize their 'first choice' of destination would be more interested in developing a permanent relationship to the country through citizenship. Finally, if we try to predict an immigrant's likelihood of citizenship using statistical models that control for education, language, length of residence and other potentially important personal attributes, chances for citizenship remain higher in Canada than in the United States. Immigrants' characteristics matter in explaining citizenship, but something about the society to which they migrate also affects naturalization.

A Helping Hand: The Role of Government

The Canadian welfare state is usually grouped with the United States for its liberal, relatively non-interventionist stance. Since the 1960s, however, Canadian governments have increasingly engaged in state intervention, instituting, for example, a universal health care system absent in the United States. Within the field of immigration, Canadian governments have promoted a multicultural integration policy. First espoused by the federal government in 1971, public support for ethnic diversity was enshrined in the Canadian Charter of Rights and Freedoms in 1982 and made into federal legislation with the 1988 Multiculturalism Act. Public recognition – and funding – of ethnic diversity is accompanied by settlement programs in such areas as language learning, job counseling and citizenship classes. Relative to expenditures for welfare, health care and education, public funding for multiculturalism and settlement programs have been very modest. Nonetheless, they have been consequential. It is no coincidence that the divergence in Canadian and American citizenship occurs precisely at the moment these policies gained steam.

These programs have had two main effects. First, they provide immigrant communities with the resources necessary to acquire citizenship and exercise political voice. Immigrant incorporation, including political integration, is a social phenomenon with newcomers calling on friends, family, co-ethnic businesses and local community organizations for assistance. In explaining how they became citizens, many ordinary immigrants tell stories of having paperwork filled out at a nearby community

organization, buying a citizenship study guide from a co-ethnic notary public and asking a daughter to practice English conversation.

Government support provides a richer social infrastructure in Canada. Government sponsored language classes help immigrants feel confident they can pass the citizenship language requirement. Grants to local community organizations provide extra citizenship classes to those worried that age or lack of education will prevent naturalization. More generally, multiculturalism programs and other government initiatives support a greater array of immigrant community organizations in Canada than in the United States. Not all communities need such outside assistance – many ethno-cultural organizations survive on members' fees or fundraising efforts – but immigrant groups with relatively fewer resources clearly benefit from a helping hand.

Second, the symbolism of government concern evident in public goods provision and the rhetoric of Canadian multiculturalism make immigrants more interested in citizenship. The Canadian state's official endorsement of multiculturalism gives immigrants normative standing in the political system. Public programs for immigrants or refugees provide newcomers with a stronger sense of linkage between the state and themselves. Immigrants I interviewed in Canada felt that, despite problems, they could count on government, generating a sense of obligation to participate and give back. In the United States, the idea of citizenship evokes rights and economic opportunities, but entails a more modest sense of engagement.

A Portuguese immigrant who has lived twenty years in the United States and thirteen years in Canada offered an excellent summary of the trade-offs I consistently heard. For him, the United States is economically "the best country in the world." Life is cheaper and he feels that America is truly a land of opportunity. However, while he currently lives in Massachusetts, he dreams of going back to Toronto, "It's just the place that I feel home." This attachment stems in large part from his sense of welcome, "the respect for who you are, what you are, especially about ethnicity and for immigrants," as well as "the way the government runs things – I guess the great support, the multicultural stuff, the social assistance. We pay a lot of tax, that's true. But the great concern of government, the help for the citizens themselves."

Future Citizenship Trajectories

The current American administration is unlikely to adopt Canadian policies, but the refugee resettlement program shows that the country can, and has, initiated efforts to proactively support newcomers. The Homeland Security Act of 2002 mandated a new Office of Citizenship whose Chief is charged with promoting citizenship, fostering public-private partnerships and overseeing a staff of Community Liaison Officers. A new immigration bill introduced by Senators John McCain and Edward Kennedy in the 109th Congress would establish a Citizenship Foundation that could provide grant money through the Office of Citizenship. All these steps improve the chances that immigrants will become citizens.

At the same time, it is an open question whether a more proactive and service-friendly atmosphere can be maintained or expanded when naturalization and immigration services are housed within a department dedicated to "homeland security", especially when security is defined largely against foreign threats. The theme of USCIS's 2005 Strategic Plan, which is also used as a slogan on various customer service publications available to immigrants, is "Securing America's Promise." The promise is there, but it comes second to security.

In Canada, governments cut funding to multiculturalism and scaled back services offered to newcomers in the late 1990s and into 2000. The 2005 federal budget finally increased funding for integration and settlement services for the first time in five years, with \$20 million slated for community organizations in the 2005-06 fiscal year. The budget promised a total of \$298 million over five years to community groups. Future governments will need to consider that any short-term fiscal gains achieved through cutback might be undermined by the long-term exclusion of newcomer populations.

The decision to cut programming in Canada, or to broaden immigrant settlement in the United States, is ultimately a political choice, one wrapped in debates that extend beyond immigration to include foreign-policy, welfare state development and management of historic ethno-racial tensions in each country. The consequences of such decisions are significant. Immigrant citizenship is better served when governments extend a welcoming hand: offering concrete settlement assistance and recognizing immigrants' diverse identities and cultures within a framework of "future citizen" rather than foreigner or alien.

NOTES

¹ This article is based on Irene Bloemraad's recently published book, *Becoming a Citizen: Incorporating Immigrants and Refugees in the United States and Canada* (University of California Press, 2006).

² The U.S. residency requirement falls to three years for spouses of American citizens and can be waived entirely for those who have seemed combat in the U.S. military. Both countries offer easier rules for the elderly. In Canada those over the age of 55 do not need to write the civic test or prove language ability. (Prior to April 2005, the minimum age was 60.) In the United States, language competency is waived for those over 50 with 20 years of residence, or over 55 with 15 years of residence. The civics exam is easier and can be taken in the applicant's own language for those over 65 with 20 years of residence.

³ The government of Quebec received an additional \$164 million as a block grant under their 1991 federal-provincial settlement agreement. Another \$45 million went to British Columbia and Manitoba for additional service support.

⁴ American citizenship law has remained more or less the same since the 1952 passage of the Immigration and Nationality Act. Canadian citizenship law was established in 1947, the year that Canada abandoned the use of British subjecthood to issue its own passport, and it was reformed in 1977. A series of Canadian governments have been trying to modify the Citizenship Act since 1999 but have so far failed to get a law passed in Parliament.

⁵ Although there is also some evidence that the most educated immigrants are reluctant to do so.

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