

1. Diverging Trajectories of Political Incorporation

I swear (or affirm) that I will be faithful and bear true allegiance to Her Majesty Queen Elizabeth the Second, Queen of Canada, Her Heirs and Successors, and that I will faithfully observe the laws of Canada and fulfill my duties as a Canadian citizen.

OATH OF AFFIRMATION OF CITIZENSHIP, *Canada*

I hereby declare, on oath . . . that I will support and defend the Constitution and laws of the United States of America against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same . . . and that I take this obligation freely without any mental reservation or purpose of evasion; so help me God.

OATH OF ALLEGIANCE, *United States*

The passage of the U.S. Personal Responsibility and Work Opportunity Reconciliation Act, commonly known as the Welfare Reform Act, suddenly and dramatically highlighted the importance of citizenship in the United States. Signed into law on August 22, 1996, the act introduced sweeping revisions to the distribution of public benefits for all residents of the United States. Immigrants faced arguably the harshest change: within a year of the law's passage, most noncitizens, including longtime legal permanent residents, would be denied Supplemental Security Income and food stamps. States could also refuse Medicaid and welfare to those who were not U.S. citizens.¹

The act reversed a long trend blurring distinctions between citizens and legal permanent residents. In the 1960s and 1970s courts and legislatures had rolled back citizenship requirements for certain professions, licenses, and public benefits. Welfare reform redrew a sharp divide between citizens and "aliens."² Statistics from the U.S. Census Bureau showed that of approximately 25.8 million foreign-born residents living in the United States in March 1997, barely 35 percent had acquired citizenship (Schmidley and Gibson 1999). Millions of people would be unable to turn to the government if they fell on hard times.

The Census Bureau statistics also sparked concern over immigrants'

political incorporation. Citizenship among the foreign born hit an all-time low in 1997, standing at less than half the midcentury percentage, 79 percent. Since political rights such as the right to vote in state and federal elections or the ability to stand for elected office are tied to American citizenship, declining naturalization means declines in immigrants' ability to participate in electoral politics.

The fall in naturalization in the United States is all the more startling if we consider America's neighbor to the north. In 1996, 70 percent of foreign-born residents in Canada were naturalized citizens (Statistics Canada 2001). For the level of naturalization in the United States to mirror that in Canada, more than nine million noncitizen residents would need to acquire American citizenship overnight. Both countries share a liberal approach to immigrant naturalization predicated on a historic belief in immigration as a tool for population growth and economic expansion. American and Canadian citizenship laws draw from common English roots. Given such similarities, it is not surprising that immigrant naturalization in the United States and Canada looked remarkably alike for most of the twentieth century. However, beginning in the 1970s, naturalization trajectories part course dramatically.

A similar phenomenon can be seen in the percentage of foreign-born individuals in each country's legislature. Successfully electing a foreign-born politician to national office is a highly symbolic, and potentially influential, indicator of immigrants' political incorporation. As with citizenship, over the first half of the twentieth century, similar proportions of foreign-born legislators sat in the U.S. Congress and Canadian Parliament, relative to the percentage of the foreign born in the overall population. Since the 1960s, however, immigrants in Canada have moved much closer and more rapidly to representational parity than immigrants in the United States.

These differences are surprising given the many similarities between the two countries. The direction of divergence also flies in the face of conventional wisdom. Many would predict that the United States, with a longer history of independence and an arguably stronger assimilationist impulse, would encourage political integration more than Canada. The United States promotes a unifying civic nationalism based on the ideals of the American Revolution; Canada weathers recurrent separation attempts by Quebec (Lipset 1986, 1990). Further, in the eyes of some, Canada espouses a potentially divisive policy of official multiculturalism that encourages difference rather than common "Canadianness" (Bissoondath 1994; Gwyn 1995). Even those sympathetic to the recognition of difference assume that government promotion of multiculturalism retards immigrant integration: "The more the social and political institutions of the host society accept and recognize

ethnic differences, the less likely are immigrants to experience pressure, either formally or informally, to file for citizenship. In the case of landed immigrants, the multiculturalist context of Canadian society has contributed toward prolonging their decisions to apply for citizenship. . . . The situation should be different in the United States, where ethnicity has officially received a low profile" (Legendre and Shaffir 1984: 257). Yet the opposite is true. Why have trajectories of political integration diverged so sharply in North America? Why does incorporation happen more quickly in Canada, despite worries over the country's political future and its sense of national identity?

The most obvious answer, prevalent in many comparative accounts of immigration and citizenship, suggests that legal codes make political incorporation easier and more attractive in Canada, or more costly and less beneficial in the United States. Alternatively, scholars of politics suggest that the immigrants, rather than the legal codes, likely differ. General models of voting consistently show that people with greater skills, resources, and interest in politics are more likely to participate. It is easier to naturalize, vote, or run for office if you have good communication skills, as measured by years of education or English proficiency. Differences in political incorporation might consequently stem from differences in the type of immigrants who move to the United States or Canada. As we will see in this chapter, both explanations have merit, but—surprisingly—neither explains away the gap in political incorporation.

CITIZENSHIP AND NATION BUILDING IN NORTH AMERICA

Working within—and sometimes against—their common British history, the United States and Canada formulated similar systems of liberal naturalization. Individuals can acquire U.S. citizenship at birth if they are born on American soil (*jus soli*) or, if born in a foreign country, based on their parents' American citizenship (*jus sanguinis*).³ *Naturalization* is the legal process that enables those not born with U.S. citizenship to become American citizens. Canada similarly grants citizenship based on birth, blood, and naturalization. Despite earlier restrictions based on race and gender, citizenship policies in the two countries have been among the most open in the world (Brubaker 1989; Ueda 2001).

Inclusive citizenship practices reflect a desire to integrate immigrants into the polity and to forge identities as independent countries. Once naturalized, foreign-born citizens in the United States and Canada enjoy equal-

ity with the native born. For countries of immigration, naturalization plays a particularly important role in nation building: it increases the number of citizens, and by specifying the conditions of membership, it defines how the citizenry is constituted.

British Roots

British colonists to North America, whether they went to the thirteen colonies or farther north, imported a common law tradition based on feudal notions of subjectship. A 1608 judicial dispute in Britain, Calvin's Case, established a theory of political membership based on natural law: like parent to child, so was the king to his subjects (Schuck and Smith 1985). The king provided protection to anyone born on his lands in return for the subject's service, allegiance, and obedience. As part of the British Empire, those born in the North American colonies became British subjects.⁴ A native-born British subject enjoyed free movement and rights throughout the British Empire, including the right to own property or run commercial establishments. Foreigners, denied such rights, had a clear interest in acquiring the benefits of subjecthood.

In response to migration and imperial conquest, English law developed alternative statuses and procedures for obtaining subjecthood, including naturalization. The Crown, English Parliament, and colonial assemblies and proprietors engaged in fierce jurisdictional competition; each claimed authority to naturalize aliens. The colonies wished to lure settlers and usually embraced a liberal policy of naturalization.⁵ Parliament, in London, favored limited naturalization to restrict trading rights and because of religious intolerance.⁶ A two-tiered system developed in which the colonies could naturalize aliens locally, granting local legal status, but England controlled the empire-wide status of British subjecthood.⁷

America's Revolutionary Citizenship

Shifting power dynamics between the Crown and Parliament, as well as among parties within Parliament, created frequent changes in England's policies. A crisis point was reached in 1773 when London banned colonial naturalization. At this juncture, American and Canadian citizenship parted course. Among the grievances outlined in the Declaration of Independence, the colonists charged that King George III "has endeavoured to prevent the Population of these States; for that Purpose obstructing the Laws for Naturalization of Foreigners." Article IV of the Articles of Confederation introduced the idea of citizenship rather than subjecthood, and it left determination of citizenship to the individual states. This arrangement soon

proved unworkable, since it was not clear whether someone naturalized in one state possessed reciprocal rights in another.⁸ The U.S. Constitution consequently gives Congress the power “to establish a uniform Rule of Naturalization” (Article 1, Section 8). Congress acted on this authority quickly, passing the first U.S. naturalization law on March 26, 1790.

Defining the criteria for membership in the new nation provoked heated debate and frequent legal changes. By 1802 the proponents of liberal naturalization had triumphed: applicants could file for citizenship in any court of record after five years of residence in the United States and a prior declaration of their intention to become a citizen. Would-be citizens had to swear an oath to uphold the Constitution and renounce allegiance to foreign sovereigns. These criteria would define naturalization throughout the nineteenth century.⁹

The idea that citizenship could be an individual choice was radical for the period. The concept of voluntary adherence to an adopted country, as embodied in naturalization, predated the American War of Independence, but by calling people “citizens” rather than “subjects,” Americans signaled a view of membership predicated on Lockean notions of social contract and consent (Kettner 1978). The revolutionary period made the act of naturalization not just a question of legal status, but also an affirmation of the new state’s legitimacy (Schuck and Smith 1985; Ueda 1982).¹⁰

At the same time, American citizenship contained important limits to its inclusive vision. The first law on naturalization restricted its application to “free white persons.” Black immigrants gained access to naturalization under legislation passed in 1870, but twelve years later the Chinese Exclusion Act of 1882 prohibited any Chinese immigrant from acquiring U.S. citizenship through naturalization.¹¹ Using a narrow interpretation of the Fourteenth Amendment, subsequent court decisions made it difficult for any East or South Asian immigrant to naturalize (Gualtieri 2001; Haney López 1996). Rogers Smith argues that despite lofty ideals, citizenship in the United States had a strong tendency to “ascriptive Americanism”: legal statutes, judicial decisions, and legislative debates “manifested passionate beliefs that America was by rights a white nation, a Protestant nation, a nation in which true Americans were native-born men with Anglo-Saxon ancestors” (1997: 2). Racial restrictions on naturalization ended only in the middle of twentieth century. Chinese immigrants gained access to citizenship in 1943, Filipinos and Asian Indians in 1946. The 1952 McCarran-Walter Act definitively removed race or national origin as a criterion for American citizenship.

Citizenship regulations also varied by gender. Naturalization was open to

white women, but an 1855 legislative act decreed that a married immigrant woman automatically became a citizen upon her husband's naturalization or, if he were a U.S. citizen prior to marriage, upon their marriage, regardless of her wishes (Bredbrenner 1998). The 1907 Expatriation Act extended the logic of linking a woman's citizenship to her spouse: under the act, a naturalized or U.S.-born American citizen *lost* her U.S. citizenship upon marriage to an alien and could gain it back only if her husband naturalized (Bredbrenner 1998). Only when women's suffrage appeared imminent—and concern built that thousands of immigrant women would have the right to vote without having proven their suitability for citizenship—did politicians and the public push for gender-neutral naturalization. The 1922 Cable Act gave most women control over their nationality, ushering in the current practice that men and women must apply for citizenship independently, regardless of marital status (Sapiro 1984).¹²

Naturalization procedures and the benefits of citizenship also varied by locality in nineteenth- and early-twentieth-century America. Although the Constitution assigned jurisdiction over naturalization to Congress, local courts could bestow citizenship, and judges enjoyed great latitude in their decisions (Erie 1988; Gavit 1922). The penalties of not being a citizen varied widely: in some states certain professions and privileges were restricted to citizens; in other states immigrants who had merely declared their intention to naturalize could vote in elections.¹³

Partly because of gross geographic variation in immigrant citizenship, Congress passed the comprehensive Naturalization Act in 1906, which codified and standardized the requirements for citizenship. The act established a new federal bureaucracy, the Bureau of Immigration and Naturalization (later, the Immigration and Naturalization Service, or INS), to oversee and systematize naturalization procedures.¹⁴ The act also required applicants to demonstrate a rudimentary knowledge of American history and civics, and it mandated a basic ability to speak and understand English. These changes made greater demands on immigrants, but they also led to fairer and more equal treatment of all would-be citizens (Bloemraad and Ueda 2006).

The only major change to U.S. naturalization procedure in the post-World War II period came with the 1952 Immigration and Nationality Act, also known as the McCarran-Walter Act. Applicants henceforth needed to read and write a simple sentence in English. There have been only minor modifications to naturalization regulations since then. Today, special cases aside, someone wishing to become a U.S. citizen must prove five years of residence as a legal immigrant, pay a fee of \$330, prove basic oral and writ-

ten ability in English, and demonstrate knowledge of U.S. government and history. A judge or immigration and naturalization official can refuse to grant citizenship for a variety of reasons, including past criminal convictions, long visits outside the country, or a failure to demonstrate “good moral character.” Immigrant children can derive citizenship when their parents naturalize, but all adults must apply for citizenship independently.¹⁵

Incremental Canadian Citizenship

If American citizenship was born in revolution, Canadian citizenship evolved in polite revolts against British tutelage. In Canada, British influence lasted longer, since Canada’s break with Great Britain was more incremental. Passage of the British North America Act (Constitution Act, 1867) created an autonomous Dominion of Canada through a confederation of four British colonies. Under confederation, residents preserved their status as British subjects, the primary citizenship category in the new dominion.¹⁶ The Canadian government gained the right to make most laws in the dominion, but Britain retained residual power over key aspects of sovereignty, including amending the Constitution and British subjecthood. Britain sought control over subjecthood because this status gave rights throughout the British Empire.¹⁷ At the same time, Section 91 of the Constitution Act accorded exclusive legislative authority over “naturalization and aliens” within the dominion to Canadian Parliament.¹⁸ The eighteenth-century tug-of-war between London and the colonies continued into the nineteenth century.

In an 1868 act of Parliament, the new Canadian government guaranteed that those who had naturalized in the confederating colonies before 1867 would continue to hold equal rights in the new country. The act also established liberal guidelines for future naturalization: three years of residence, good character, and an oath of loyalty to the Crown (Kaplan 1991: 10–11).¹⁹ Two years later the British Parliament approved an imperial statute (Naturalization Act, 1870) stipulating that an individual naturalized in one of the colonies enjoyed equal rights with native-born subjects but that such rights were exclusive to that colony (Hancock 1937). Dissatisfaction with the lack of a uniform rule led Britain and the dominion governments to agree, during the Imperial Conference of 1911, to a uniform procedure of naturalization and recognition of local naturalization throughout the British Empire (Brown 1996).²⁰ These negotiations were enshrined in the Canadian Naturalization Act, 1914, which instituted a five-year residence requirement and also specified that applicants must be of good character, not be

under any disability (“infant, lunatic, idiot, or married woman”), and possess adequate knowledge of English or French (Hancock 1937).²¹ The law largely governed membership in Canada for the next three decades.

Under the 1914 act, judges oversaw verification of the law, but unlike in the United States, the ultimate authority to grant naturalization rested with the secretary of state, a cabinet position held by a member of Parliament from the governing party. Hancock underlines that “the Secretary of State may, in his own absolute discretion, grant the certificate [of naturalization]. . . . So far as I know, no one has attempted to challenge his action . . . in the courts of justice” (1937: 92, 95). This difference—of strong judicial authority in the United States and strong government oversight in Canada—would have repercussions in the years to come.²² The Canadian structure of authority and responsibility permits greater latitude, and arbitrariness, by allowing orders-in-council and ministerial decisions to modify legal codes or administrative regulations (Kelley and Trebilcock 1998). The American system, heavily reliant on legal interpretation and judicial oversight, promotes transparency but also rigid and narrow interpretation of congressional legislation.

A patchwork of membership classes thus characterized Canadian residents in the early twentieth century. *Aliens* designated people born outside the British Empire and living in Canada. They had no right of admittance and could only gain standing as a British subject or Canadian citizen through naturalization. *Native British subjects*, either born in Canada or elsewhere in the British Empire, needed no special status to enter Canada. They could also become Canadian nationals, a “rather hollow distinction,” by simply residing in Canada for five years (Hancock 1937: 98). Aliens who naturalized in Canada were variously called *British subjects of Canada*, *Canadian citizens*, or *Canadian nationals*.²³ These individuals enjoyed right of entry into Canada, but their status elsewhere in the British Empire depended on prevailing laws. At the close of World War II, Canada’s citizenry consisted of native-born Canadians, naturalized Canadians who had affirmatively sought political membership along the lines of U.S. volitional citizenship, and a third class of individuals who were foreign born but, because of their status as British subjects, were not required to take any confirmatory action for permanent status.

A series of political and legislative acts eliminated this third category of legal membership as Canada further asserted its sovereignty and national identity in the post–World War II era. The first step in this process was the passage of the Canadian Citizenship Act. The act went into effect on January 1, 1947, and it established for the first time clear, legal Canadian citizenship,

accompanied by the first Canadian passport.²⁴ As in the United States, the impetus to assert independent nationality arose from war and a desire to integrate individuals of various backgrounds into one political membership.²⁵ Under the new act, immigrants could naturalize after attaining twenty-one years of age, five years of residence, demonstrating adequate knowledge of English or French, and showing understanding of the responsibilities and privileges of Canadian citizenship. Language requirements were waived for those with more than twenty years of residence.

The government took great pains to underscore the symbolic unification accorded by the new citizenship, a bond that crossed ethnic lines. During the inaugural ceremony organized in January 1947, the first certificate of Canadian citizenship was given to the prime minister, but the second went to "Wasył Elnyiak, one of the first Ukrainians to farm in western Canada. . . . We had discovered him after a long search through the immigration department's records" (Martin 1993: 76). Other recipients were of Danish, Italian, and Jewish background. According to Kaplan, "The *Act* was designed in such a way as to extend the opportunity of citizenship to as many people as possible, to impress upon all Canadians the value of citizenship status and to promote nationality unity. The *Act* was an immediate success" (1991: 20).

At the same time, British connections remained. Canadian citizenship was primary, but all Canadians continued to be British subjects. Immigrants who were already British subjects enjoyed special rights in Canada: after a year of residence, they could vote in Canadian elections without naturalizing, and they could gain Canadian citizenship after five years of residence without seeing a citizenship judge.²⁶ These provisions were eliminated in Canada's second major piece of citizenship legislation, the 1977 Citizenship Act and accompanying Citizenship Regulations. Henceforth all immigrants, regardless of origin, would be treated the same.²⁷ Various technical changes made naturalization easier—the age of majority was reduced to eighteen, residence requirements were dropped to three years, and dual citizenship was implicitly allowed—but most important was a change in philosophy heralded by the 1977 act. According to Kaplan, "The 1947 *Act* operated on the principle that the granting of citizenship was a privilege. This was viewed by many as negative and restrictive. The 1977 *Act* made citizenship a right which could be enjoyed by anyone once the requirements . . . were met" (1991: 24). As we will see later, the shift in attitude—transmitted to the bureaucracy administering naturalization—stands in contrast to the stance taken by the American immigration and naturalization bureaucracies.

THE PUZZLE OF THE NORTH AMERICAN NATURALIZATION GAP

How do these laws translate into citizenship outcomes? To answer that question, we need a measure of immigrant naturalization.

Naturalization can be calculated as a *level* or a *rate*. A naturalization level counts how many individuals in an immigrant group or cohort hold citizenship on a certain date. Thus Current Population Survey figures from 2004 indicate that out of a foreign-born population of over 34.2 million, just over 13.1 million individuals, or 38 percent, hold U.S. citizenship.

Aggregate levels are deceptive, however, since they vary greatly with migration flows and immigrants' length of residence, which is one of the strongest and most consistent predictors of citizenship. A more accurate statistic is the naturalization rate. It measures the time elapsed between arrival in a country and naturalization. U.S. census data from 1920 suggest that Irish immigrants were quicker to take up U.S. citizenship than French Canadians: on average, 9.7 years elapsed between immigration and naturalization for adult Irish immigrants, while French Canadians waited 13 years.²⁸

The rate and level of naturalization are linked but not equivalent. An immigrant group that acquires citizenship slowly can have a high level of citizenship if the group has lived in the adopted country for decades. A recent immigrant group might have a low level of citizenship but be naturalizing quickly.²⁹

Citizenship Levels in the United States

Figure 1 tracks the level of citizenship among foreign-born residents in the United States from 1890 to 2000. For the decades prior to 1920, the data reflect only adult male naturalization; enumerators did not systematically collect information on women and minors, since their status largely depended on their husband or father.³⁰ A trend line in figure 1 shows the percentage of the U.S. population that is foreign born in a given census year.

The United States witnessed two great immigration waves during the twentieth century, the first from 1880 to 1924 and the second from 1965 to the present. During the first, the INS records more than 26 million admissions (U.S. Immigration and Naturalization Service 2002). This influx doubled the foreign-born resident population from just under 6.7 million in 1880 to a bit over 13.9 million in 1920 (Gibson and Lennon 1999).³¹ During periods of massive immigration, new arrivals increase the number of foreign born living in the United States—the denominator for calculations—

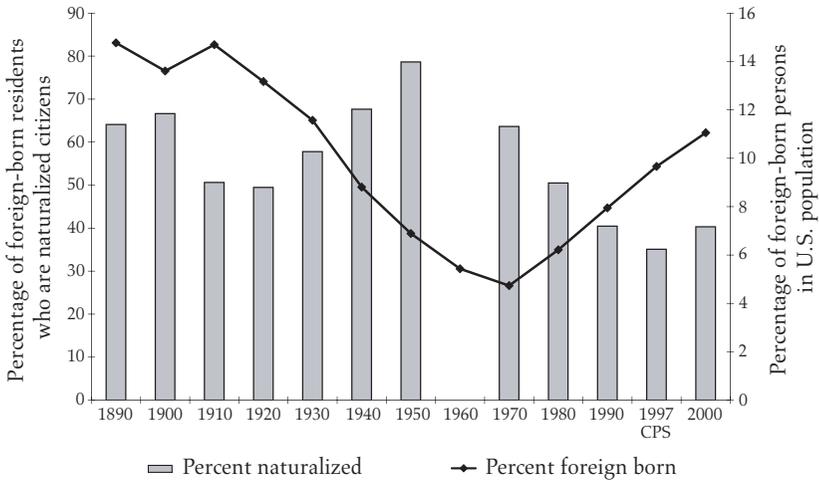


Figure 1 Foreign-born residents of the United States, 1890–2000. The line represents the percentage of the overall U.S. population that was foreign born; the bars represent the percentage of foreign-born residents who were naturalized. Figures for 1890 to 1910 are for adult men only. The U.S. Census Bureau did not collect citizenship data in 1960. SOURCES: Gibson and Lennon (1999); Schmidley and Gibson (1999); U.S. Census Bureau (2002).

but because the newcomers cannot become citizens immediately, their presence drives down aggregate naturalization levels. Not surprisingly, the levels of naturalization decline during this first period of massive immigration.

The more years an immigrant lives in his or her new home, the more likely he or she is to naturalize. Researchers debate why time is important: perhaps it reduces the costs of citizenship and makes the benefits more apparent (Jasso and Rosenzweig 1986; Yang 1994), or it may mark assimilation and growing attachment to the receiving society (Evans 1988; Liang 1994). Regardless of the reason, when few new immigrants arrive in the United States, naturalization levels rise as average length of residence increases. Immigration restrictions in 1921 and the implementation of permanent immigration quotas under the 1924 National Origins Act reduced the flood of newcomers to a trickle. In response, citizenship levels rose steadily from 1920 to 1950, peaking at 79 percent (Gibson and Lennon 1999).

U.S. immigration only liberalized with the 1965 Immigration Act, or Hart-Cellar Act. Congress eliminated national origin quotas and raised the overall ceiling on immigrant admissions. The effect was dramatic: in 1960, 265,000 individuals became legal permanent residents of the United States;

two decades later immigrant admissions doubled to 530,000; and by 2000 they stood at 850,000 (U.S. Immigration and Naturalization Service 2002).³² As a result, citizenship levels fell over this period so that by 1980, they stood at 1920 levels. The level of naturalization hit an all-time low of 35 percent in 1997 and then rose slightly to 40 percent in 2000. The rapid increase in the number of recent noncitizen arrivals during the post-1965 period accounts for about a third of the drop in the naturalization level from 1970 to 1996 (Schmidley and Gibson 1999). That is, some of the post-1965 decline merely reflects substantial new migration, like in the 1880 to 1924 period, not a decrease in immigrants' propensity to acquire U.S. citizenship.

Citizenship Levels in Canada

The gradual evolution of Canadian citizenship makes historic comparison with the United States a bit complicated. Determining levels of naturalization in the United States is relatively simple: identify the foreign-born population, eliminate those who acquired U.S. citizenship at birth through their parents, and then calculate the percentage of the resident foreign born who have naturalized.³³ Identical calculations are less evident in the Canadian case. Prior to 1947, any immigrant from the British Empire who was a British subject—whether from Great Britain, the Caribbean, or the Indian subcontinent—had legal standing akin to citizenship. A fair comparison with the United States must therefore be based on the citizenship status of those born outside the British Empire. In 1901, 40 percent of immigrants fit this description; by 1941 it was 50 percent. In the second half of the century, a calculation similar to the one used in the American case becomes appropriate.³⁴ Figure 2 depicts changes in the level of Canadian naturalization from 1901 to 2001 based on Canadian census data. The figures prior to 1951 are calculated using the non-British immigrant population; those in 1951 and later include individuals born in the United Kingdom and British dependencies.

Figure 2 also includes a trend line tracing the proportion of the Canadian population that is foreign born. Compared to the United States, Canada has experienced less dramatic fluctuations in immigrant admissions, due to a largely open-door policy throughout much of the twentieth century.³⁵ During the American closed-door period, from 1924 to 1965, Canada remained open to immigration, except during the Depression and World War II.³⁶ Like in the United States, new Canadian immigration regulations in 1962 and 1967 removed discriminatory policies favoring European migrants, but the actual number of migrants admitted in any year remained relatively stable, only creeping up late in the century. From 1960 to 1990, admissions gradually doubled, from 104,000 to 216,000 (Citizenship and Immigration Canada

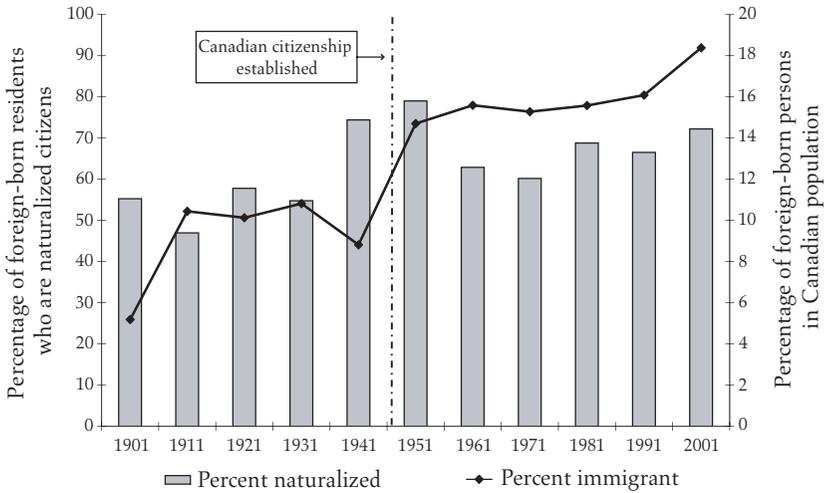


Figure 2 Foreign-born residents of Canada, 1901–2001. The line represents the percentage of the overall Canadian population that was foreign born; the bars represent the percentage of foreign-born residents who were naturalized. Figures for 1901 to 1941 do not include British immigrants, since they did not need to naturalize until Canadian citizenship was established in 1947. SOURCES: Leacy (1983); Statistics Canada (1995, 2004).

2002). In the 1990s and into the new century, about a fifth to a quarter of a million people migrated to Canada each year.

The relationship between the immigrant population and naturalization in Canada is similar to the one in the United States in the first half of the century and from 1951 to 1961: as the number of newcomers increases, the percentage of naturalized citizens decreases. Surprisingly, from 1971 to 2001 naturalization levels tend to *rise* as the proportion of foreign born in the Canadian population increases.³⁷ We would expect the opposite: residency requirements and immediate adjustment pressures should produce a delay between arrival and naturalization. For naturalization to rise over this period of growing immigration—a modest increase in the foreign-born population from 15 percent to 19 percent—naturalization applications had to be increasing more rapidly, in contrast to the pattern in the United States.

Indeed, juxtaposing Canadian and American citizenship trends reveals a growing naturalization gap over the last decades of the twentieth century. As seen in figure 3, levels of citizenship for adult immigrants in the two countries largely parallel each other up to 1971. In the first half of the century the largest difference in naturalization occurs in 1900–01, a time of particularly

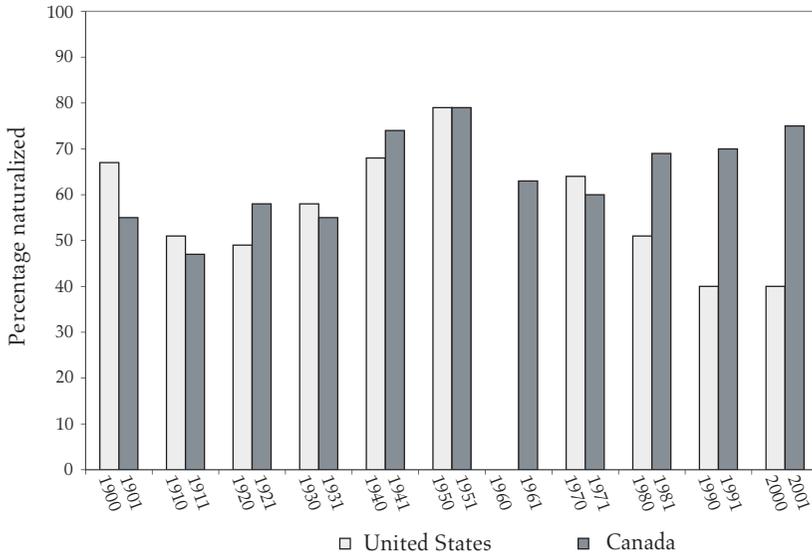


Figure 3 Percentages of foreign-born adults naturalized in the United States and Canada, 1900–2001. The U.S. figures for 1900 and 1910 are for men only; no data are collected in 1960. The Canadian figures for 1901 to 1941 do not include British immigrants. The U.S. Census Bureau did not collect citizenship data in 1960. SOURCES: Gibson and Lennon (1999); Leacy (1983); Schmidley and Gibson (1999); U.S. 2000 Census of Population and Housing; Statistics Canada (1995, 2004).

robust citizenship acquisition in the United States. In the ensuing decades, Canadian levels of citizenship are slightly higher around the two world wars, while American levels are a little higher in 1910 and 1930. Given Canada's early engagement and long involvement in both wars, it is not surprising that immigrants acquired Canadian citizenship during these periods or at least reported citizenship on the census. U.S.-Canada similarities end in the 1970s. We see a sharp divergence in levels of citizenship. Why, during a period of sustained immigration in both countries, does U.S. citizenship acquisition fall so dramatically while Canadian levels actually increase?

SEARCHING FOR AN EXPLANATION: CURRENT THEORIZING

It is possible that this puzzle stems from a comparison of apples and oranges. Perhaps the people who move to Canada are not at all like those who move to the United States. Or perhaps the legal structure of citizenship—the nat-

uralization laws and the costs and benefits of citizenship—differs radically between the two countries.

Size and Composition of Immigrant Streams to North America

Is the North American naturalization gap an artifact of differences in Canadian and American immigration policies? As we have seen, when the absolute number of newcomers rises, citizenship levels usually fall due to length-of-residence effects. The proportion of foreign-born residents has changed less in Canada than in the United States. From 1971 to 2001, the percentage of foreign born in Canada increased by about a quarter, from 15.3 percent to 19.1 percent, whereas in the United States the percentage more than doubled, from 4.7 percent in 1970 to 11.1 percent in 2000. Is the U.S.-Canada difference merely a function of the rapidly growing immigration population in the United States?

The short answer is no. The increase in the Canadian foreign-born population, although modest, should have resulted in a slight decrease in naturalization if naturalization rates were constant. Instead we observe a small increase in Canadian citizenship levels. The anomaly hints that changes in the relative size of the immigrant stream cannot account for the bulk of the North American naturalization gap. Indeed, a comparison of migrant cohorts suggests that the rate of naturalization slowed significantly in the United States since 1970 but increased in Canada. At the start of the 1970s, foreign-born individuals with eleven to fifteen years of residence in Canada or the United States had nearly identical levels of citizenship, just over 61 percent. In 1980 the level of naturalization among those with eleven to fifteen years of residence decreased by almost a third in the United States to 43 percent, but it rose in Canada to 68 percent. The Canadian figure increased again in 1991 to stand at almost 78 percent, while only 42 percent of immigrants in the United States with eleven to fifteen years of residence reported naturalized citizenship in 1990. Cohorts with fewer or more years of residence exhibit similar patterns.³⁸ The North American naturalization gap is not merely a function of changes in the magnitude of immigrant admissions.

But what about the composition of the migrant streams? There is overwhelming evidence that immigrants from different countries naturalize at varying rates.³⁹ Little consensus exists as to why country of origin matters. Some believe that shared cultural traits influence incorporation patterns. According to this line of reasoning, immigrants bring their home country's civic or political culture with them when they migrate, influencing the group's attitudes toward citizenship and political participation (Greeley and

McCready 1975). Others contend that immigrants from the same country act in a like manner because they face similar decision-making contexts over the costs and benefits of naturalization. For example, the “reversibility” thesis posits that the smaller the distance between the sending and receiving country, the less likely immigrants are to naturalize because chances for return seem high (Portes and Mozo 1985). Developed to explain low Canadian and Mexican naturalization in the United States, the argument can be extended to understand high rates of naturalization among refugees: refugees take out citizenship since they see little chance of returning home, or “reversing” their migration. Other factors relevant to immigrants’ calculations include the relative economic development of their country of origin, or its orientation toward capitalism or socialism.⁴⁰

These considerations are important because migration streams to Canada and the United States come from different parts of the globe. Before 1965 immigration policy in the United States favored permanent immigration from Europe and Canada and temporary migration from Mexico. Individuals from Asia and Africa found it almost impossible to move to the United States. In the 1950s, 53 percent of those granted permanent residency in the United States came from Europe while only 6 percent and 0.6 percent came from Asia or Africa, respectively. The 1965 Hart-Cellar Act removed restrictions that blocked non-European migration. In the 1990s Europeans accounted for only 15 percent of legal immigrants in the United States, while the figures for Asians and Africans were 31 and 4 percent, respectively (U.S. Immigration and Naturalization Service 2002: 16, 200). The United States continues to draw large numbers of Hispanic migrants, primarily from Mexico but also from Central and South America and the Spanish-speaking Caribbean. Indeed, Hispanic immigration makes up the majority of the contemporary immigration flow.

In comparison, Canada is home to relatively few Hispanic immigrants and historically has been more dependent on European immigration. Following World War II, Canada absorbed hundred of thousands of Europeans displaced by war or seeking better economic opportunities. 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 (Canada. Department of Manpower and Immigration 1967). New immigration policies introduced in 1962 and 1967 opened the door to the rest of the world so that, by 2000, Europeans made up just 19 percent of immigrant admissions. The majority of immigrants, 53 percent, came from Asia and the Pacific (Citizenship and Immigration Canada 2002: 8). About 18 percent of immigrants hailed from Africa and the Middle East, and only 7 percent came

from Central and South America (Citizenship and Immigration Canada 2002: 8).

Table 1 details the thirty most prevalent birthplaces among the foreign-born population living in the United States and Canada in 2000 and 2001. Table 2 lists the top ten countries of origin for immigrants admitted in 2000. Canada has a greater proportion of European immigrants, mostly of older migrant stock, and it draws newer migrants primarily from Asia, the Middle East, and the English-speaking Caribbean. The United States also receives sizeable Asian migration, but unlike its northern neighbor, Hispanics make up a large proportion of the total, and Mexicans clearly dominate.

These differences can have important effects on aggregate naturalization levels. For example, the very large Mexican-born population in the United States—almost 30 percent of all foreign-born residents in 2000—dwarfs the community in Canada, which constitutes less than a percentage point in 2001. Mexicans have some of the lowest naturalization levels of any immigrant group in the United States, so this population drives down aggregate U.S. citizenship levels.

A second issue is illegal migration. Unauthorized migration, by individuals either crossing the border clandestinely or overstaying temporary visas, became a significant political issue in the United States during the 1980s and 1990s. Calculations of the unauthorized population are extremely difficult to make with precision; reasonable estimates range from seven to eleven million undocumented residents living in the United States in 2000 (Bean and Stevens 2003: 25). Of those, approximately 55 percent are thought to originate from Mexico, and another 15 percent come from the next four biggest sources of illegal migration combined: El Salvador, Guatemala, Canada, and Haiti (U.S. Immigration and Naturalization Service 2002: 271). Canada is also home to illegal immigrants, most of whom overstay tourist visas. Recent news reports put the number at about two hundred thousand, but lacking any reliable estimates from government or the academic community, this figure is purely speculative (Jimenez 2003). It is certain, however, that illegal migrants in Canada constitute a smaller percentage of the overall foreign-born population than in the United States.

The difference in Hispanic migration, especially from Mexico, affects comparisons between Canada and the United States. Mexicans are less likely to naturalize than many other groups but are numerous in the United States, and they constitute a larger proportion of the illegal population, a group barred from citizenship. If we calculate the naturalization level in the United States including only non-Mexican migrants who fulfill residency requirements, the proportion of citizens increases to 48 percent in 2000.⁴¹

TABLE 1. TOP THIRTY COUNTRIES OF BIRTH FOR IMMIGRANTS
IN THE UNITED STATES (2000) AND CANADA (2001)

<i>United States (2000)</i>						<i>Canada (2001)</i>		
<i>Rank</i>	<i>Country of Birth</i>	<i>Population</i>	<i>Percentage of Immigrant Population</i>	<i>Rank</i>	<i>Country of Birth</i>	<i>Population</i>	<i>Percentage of Immigrant Population</i>	
1	Mexico	9,177,487	29.5	1	United Kingdom	614,610	10.9	
2	Philippines	1,369,070	4.4	2	People's Republic of China	345,520	6.1	
3	India	1,022,552	3.3	3	India	322,215	5.7	
4	People's Republic of China	988,857	3.2	4	Italy	318,095	5.6	
5	Vietnam	988,174	3.2	5	United States	258,420	4.6	
6	Cuba	872,716	2.8	6	Hong Kong	240,045	4.3	
7	Korea (North and South)	864,125	2.8	7	Philippines	239,160	4.2	
8	Canada	820,771	2.6	8	Poland	181,810	3.2	
9	El Salvador	817,336	2.6	9	Germany	177,675	3.1	
10	Germany	706,704	2.3	10	Portugal	155,770	2.8	
11	Dominican Republic	687,677	2.2	11	Vietnam	150,135	2.7	
12	United Kingdom	677,751	2.2	12	Yugoslavia (former)	147,830	2.6	
13	Jamaica	553,827	1.8	13	Soviet Union (former)	137,680	2.4	
14	Colombia	509,872	1.6	14	Jamaica	121,795	2.2	

15	Guatemala	480,665	1.5	15	Netherlands	118,460	2.1
16	Italy	473,338	1.5	16	Sri Lanka	91,670	1.6
17	Poland	466,742	1.5	17	Guyana	84,160	1.5
18	Haiti	419,317	1.3	18	Pakistan	83,235	1.5
19	Japan	347,539	1.1	19	Korea (North and South)	82,855	1.5
20	Russia	340,177	1.1	20	Greece	76,525	1.4
21	Taiwan	326,215	1.0	21	France	75,820	1.3
22	Ecuador	298,626	1.0	22	Iran	75,000	1.3
23	Iran	283,226	0.9	23	Taiwan	70,615	1.3
24	Honduras	282,852	0.9	24	Lebanon	68,510	1.2
25	Peru	278,186	0.9	25	Trinidad and Tobago	65,145	1.2
26	Ukraine	275,153	0.9	26	Romania	61,330	1.1
27	Pakistan	223,477	0.7	27	Haiti	53,905	1.0
28	Nicaragua	220,335	0.7	28	Hungary	50,720	0.9
29	Brazil	212,428	0.7	29	Mexico	42,740	0.8
30	Guyana	211,189	0.7	30	Czech and Slovak Republic	40,570	0.7
	<i>Total</i>	25,196,384	81.0		<i>Total</i>	4,551,910	80.6
	<i>Total foreign-born population</i>	31,107,889			<i>Total foreign-born population</i>	5,647,125	

SOURCES: U.S. Census Bureau (2002); Statistics Canada (2004).

TABLE 2. TOP TEN COUNTRIES OF ORIGIN FOR IMMIGRANTS ADMITTED TO THE UNITED STATES AND CANADA, 2000

		United States				Canada			
Rank	Country of Origin	No. Admitted	Percentage of Total No. Admitted	Rank	Country of Origin	No. Admitted	Percentage of Total No. Admitted		
1	Mexico	171,748	20.2	1	People's Republic of China	36,718	16.2		
2	People's Republic of China	41,861	4.9	2	India	26,064	11.5		
3	Philippines	40,587	4.8	3	Pakistan	14,173	6.2		
4	India	39,072	4.6	4	Philippines	10,077	4.4		
5	Vietnam	25,340	3.0	5	Korea, South	7,630	3.4		
6	Nicaragua	24,029	2.8	6	Sri Lanka	5,832	2.6		
7	El Salvador	22,332	2.6	7	United States	5,809	2.6		
8	Haiti	22,004	2.6	8	Iran	5,606	2.5		
9	Cuba	19,322	2.3	9	Yugoslavia	4,719	2.1		
10	Dominican Republic	17,441	2.1	10	United Kingdom	4,648	2.0		
	<i>Total</i>	423,736	49.9		<i>Total</i>	121,276	53.4		
	<i>Total admissions</i>	849,807			<i>Total admissions</i>	227,209			

SOURCES: U.S. Immigration and Naturalization Service (2002: 21); Citizenship and Immigration Canada (2001: 8).

However, if we adjust the Canadian figures in a similar fashion to only include those who satisfy the length of residence requirement, aggregate naturalization increases even more, to 84 percent in 2001.⁴²

Taking the analysis a step further, we can disaggregate citizenship statistics by country of origin. Table 3 contrasts citizenship levels in the United States and Canada for twenty-five migrant groups based on 1990 and 1991 census data.⁴³ I use older census data to minimize the effect that heavy illegal migration in the 1990s could have on the cross-national comparison. The first column of the table reports the percentage naturalized of those who meet minimum residency requirements for citizenship. In each case, the proportion of naturalized Canadian citizens exceeds that of the United States, although the magnitude of the gap varies, depending on the group. Differences range from six percentage points or less for traditional European source countries such as Germany, Italy, and Ireland to over fifty percentage points for countries such as Haiti and Mexico. Only when we compare the naturalization of Canadian or American nationals living in the other country do we find apparently higher citizenship acquisition among those in the United States. Overall, 55 percent of Americans residing in Canada have naturalized, compared to 60 percent of Canadians living in the United States.

Aggregate figures are deceptive, however, since they hide variation in the size of migrant cohorts over time. The next three columns in table 3 present naturalization statistics for those with six to eight, eleven to fifteen, and twenty-one to twenty-five years of residence.⁴⁴ The apparent anomaly represented by Canadian and American nationals disappears when we control for length of residence. In each cohort, Americans living in Canada are more likely to be naturalized citizens than Canadians living in the United States. The aggregate difference stems from the fact that Canadian immigrants in the United States tend to be of older migrant stock than the average American in Canada. In a similar manner, controlling for length of residence makes the German, Italian, and Irish differences much larger, hovering around thirty percentage points for those who arrived in North America in the later half of the 1970s.

The cohort of immigrants with eleven to fifteen years of residence provides a strong comparative baseline. These immigrants have had sufficient time to adjust to their new homes, learn about citizenship procedures, and undertake the naturalization process if they are so inclined. In no case is the U.S.-Canada naturalization gap for this cohort less than seventeen percentage points, and it can be as high as sixty-three percentage points.⁴⁵ Migrants born in the former Soviet Union and Lebanon show the least difference,

TABLE 3. ADULT IMMIGRANTS NATURALIZED IN THE UNITED STATES (1990) AND CANADA (1991)
In percentages

Place of Birth	United States (1990 Census)					Canada (1991 Census)				
	All Eligible Immigrants	6-8 Years of Residence (1982-84)	11-15 Years of Residence (1975-79)	21-25 Years of Residence (1965-69)	Adult Immigrant Population Estimate	All Eligible Immigrants	6-8 Years of Residence (1983-85)	11-15 Years of Residence (1976-80)	21-25 Years of Residence (1966-70)	Adult Immigrant Population Estimate
Canada/										
United States*	60.3	8.5	21.4	36.7	706,525	55.0	30.9	39.7	54.8	225,635
El Salvador	22.0	11.6	22.6	47.1	387,995	63.8	69.3	81.2	93.8	20,400
France	65.8	12.6	32.2	58.6	111,891	88.0	73.9	86.7	88.4	51,885
Germany	77.2	15.5	31.7	57.7	698,425	83.1	41.6	60.9	73.2	175,575
Greece	75.4	21.7	51.1	76.2	170,204	88.0	72.5	81.0	87.5	82,320
Guyana	53.3	23.9	58.9	78.9	101,458	86.1	78.7	90.0	95.1	61,245
Haiti	33.3	12.3	30.9	53.7	193,844	89.3	92.1	93.5	86.4	34,805
Hong Kong	73.5	30.5	73.6	87.0	128,894	87.9	86.6	92.4	95.6	124,370
India	50.4	18.6	51.8	72.2	409,157	73.1	53.4	72.2	90.7	164,570
Iran	37.9	12.7	32.6	73.6	187,109	79.0	85.4	89.0	93.8	25,340
Ireland	78.2	14.9	38.4	60.0	164,752	79.3	45.7	69.7	76.6	26,495

Italy	78.3	26.1	37.0	61.0	564,986	82.2	59.2	68.7	74.1	349,705
Jamaica	48.3	20.2	41.7	64.6	292,478	81.1	58.8	81.2	91.1	94,100
Korea (North and South)	58.5	21.0	62.8	88.5	496,730	80.4	59.3	86.1	96.5	28,230
Lebanon	68.5	29.1	71.0	83.3	80,725	85.4	86.0	88.0	91.7	45,785
Mexico	29.0	17.1	23.2	34.0	3,616,564	81.4	72.1	79.3	86.9	14,845
Netherlands	69.2	7.8	24.3	48.5	91,715	87.0	32.1	49.6	76.0	127,515
Pakistan	52.5	20.9	62.0	80.4	75,253	85.5	75.1	87.3	95.6	22,840
People's Republic of China	64.0	27.2	59.9	82.0	494,653	88.5	84.0	89.8	95.8	152,210
Philippines	71.0	38.2	72.9	86.9	831,302	87.1	81.4	91.3	95.6	111,115
Poland	74.5	31.6	45.3	65.6	371,851	90.7	82.5	84.7	88.9	166,560
Portugal	48.4	15.0	31.7	50.5	199,765	65.6	44.7	57.5	71.1	150,645
Soviet Union	83.7	44.8	77.1	69.1	355,813	95.6	85.7	93.9	87.5	97,255
United Kingdom	58.2	7.3	23.6	47.3	609,182	81.9	56.4	69.3	78.5	693,690
Vietnam	58.5	31.8	69.9	86.7	439,252	84.6	83.0	88.3	92.8	94,545

* Born in Canada for residence in the United States, and born in the United States for residence in Canada.

SOURCES: Author's calculations from 1990 U.S. census 5 percent Public Use Microdata Sample (Ruggles et al., 2004) and from 1991 Canadian census 20 percent sample data.

while those from Haiti have citizenship levels three times higher in Canada than in the United States. Because significant gaps, always with a lower U.S. naturalization level, hold across all groups, we can be confident that cross-national differences do not stem merely from the size and birthplace origins of migration streams to Canada and the United States.

Micro-Level Explanations of Naturalization

Most research on naturalization in North America explains immigrants' citizenship as an outcome of personal attributes. Some scholars adopt a rational choice framework that postulates a world of autonomous actors making decisions based on rational calculations. Depending on an immigrant's particular hierarchy of preferences, acquiring citizenship becomes rational when the benefits outweigh the costs.⁴⁶ Others adopt a resource or skill framework. Political participation depends on interest and ability to be involved, so attributes such as education, income, and familiarity with politics affects immigrants' motivation for citizenship and capacity to naturalize. Resource and rational choice explanations overlap: individual traits not only supply resources for naturalizing but also alter decision-making contexts.⁴⁷

Cross-national variation in immigrants' attributes can arise from the screening function of immigration policy and from self-selection by migrants who choose to go to the United States or Canada. The impact of immigration policy has received particular attention from those concerned with immigrants' economic success.⁴⁸ Researchers and policy makers debate whether a particular method of choosing migrants correlates with their "quality"—usually expressed in terms of human capital attributes—and whether differences in prior human capital subsequently affect incorporation. The effect of policy on *political* incorporation is rarely considered, but a similar logic applies: to the extent that human capital correlates with both economic outcomes and interest in politics, highly skilled immigrants might achieve better economic *and* political integration.

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. In the late 1990s, between two-thirds and three-quarters of legal immigrants to the United States acquired their status through family ties: a relative already living in the United States sponsored their application to migrate (U.S. Immigration and Naturalization Service 2002: 17). Under the current U.S. preference system, only about 20 percent of numerically limited visas are given based on employment (Usdansky and Espenshade 2001). This per-

centage has remained relatively constant since 1965 and drops lower if we consider all immigrant admissions.⁴⁹ Refugees accounted for 6 to 16 percent of admission in the 1990s (U.S. Immigration and Naturalization Service 2002: 17).

Canada has depended 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 a point system, which gives potential migrants points according to job skills, language ability, age, and other personal characteristics.⁵⁰ If an applicant’s total points surpass the government-set threshold, that person can be granted an immigrant visa. In the second half of the 1990s, a bit over 50 to 60 percent of all immigrants arrived as independent migrants (a figure which includes the dependents of the principal applicant), 26 to 36 percent entered under family reunification provisions, and about 13 percent came as refugees or special admissions (Citizenship and Immigration Canada 2005).⁵¹

Scholars such as George Borjas (1999) contend that a point system screens out individuals with low human capital, resulting in better outcomes for immigrants and the host society. To the extent that Canada’s immigration policy selects individuals with better language skills and more years of schooling, we might expect these immigrants to have a greater propensity to naturalize and to be active politically.⁵² Borjas’s conclusions are not without critics. Jeffrey Reitz (1998) argues that the impact of the Canadian point system is exaggerated. For example, Canada’s “skill” selection mostly sought to fill employment shortages. As a result, depending on economic conditions, people with experience as cooks or welders might receive more points than a foreign lawyer, despite significant differences in education.⁵³

We must also consider supply-side selection. Do immigrants’ motivations for choosing one country over another correlate with political outcomes? Most migrants would ideally move to the United States. I found this to be the case in both the Portuguese and Vietnamese communities. Canada is frequently viewed as a second-best option. According to Reitz (1998), the United States consistently attracts better-educated immigrants from most sending countries.⁵⁴ 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 naturalization. On the other hand, the attraction of the United States might be purely economic: people move there to make money, only to return home after a few years. It is not clear

whether selection biases attract more politically “assimilable” immigrants to Canada or to the United States.

Evaluating Micro-Level Explanations Do immigration policy and immigrants’ destination preferences explain the North American naturalization gap? Census data provide information on various attributes used to select immigrants under the Canadian point system, such as years of schooling, age, and language ability. Such data do not provide information on the reasons people migrate, but to the extent that motivations correlate with personal attributes, we can use statistical data to probe for self-selection effects.

Let us first consider material resources. Historically, immigrants in Canada do better than those in the United States, even without superior human capital attributes (Reitz 1998). In 2000 and 2001, however, immigrants’ median income was nearly identical in the two countries, about \$21,000, as was labor force participation, at 61 percent.⁵⁵ Rates of business ownership are also similar, though more immigrants in Canada own homes than in the United States. If home ownership, or historic income differences, correlates with citizenship acquisition, such differences might explain the naturalization gap.⁵⁶

Turning to skills, census data offer limited support for the contention that Canada’s point system produces an immigrant population with greater human capital than in the United States. A higher percentage of the foreign born in the United States report only an elementary education or no schooling compared to those in Canada, and of all foreign born, 37 percent in the United States but only 30 percent in Canada do not hold a high school diploma. On the other hand, more foreign-born residents in the United States, 24 percent, hold a university degree, compared to 21 percent in Canada. Thus immigrants to the United States tend to two extremes—poorly educated or highly educated. In terms of language, a smaller percentage of foreign-born adults in Canada report being unable to conduct a conversation in English or French compared to the proportion in the United States who report no English ability. The difference is perhaps a function of substantial migration to Canada from English-speaking countries such as the United Kingdom, India, and Jamaica; it might be a product of the point system that screens for language skills; or it could be the result of sustained government intervention in newcomer language acquisition in Canada.⁵⁷ Since language ability is a requirement for naturalization, language differences could affect citizenship levels.

In both countries we find a high correlation between linguistic ability in the host society’s language(s), education, and length of residence on the one

hand and naturalization on the other. Importantly, the relationship between these variables is more attenuated in the Canadian case. That is, in both countries higher levels of education are associated with a greater chance of being a citizen, but the relationship is stronger in the United States. Years of residence and citizenship are likewise highly correlated in both countries, but again the relationship is stronger in the United States than in Canada. These differences suggest that the barrier to becoming a citizen in Canada might be lower than in the United States, or that those with less schooling or fewer years of residence have a greater motivation to acquire Canadian citizenship than their counterparts in the United States. Although skills matter in explaining immigrants' citizenship in both countries, they matter more south of the forty-ninth parallel. Given that immigrants' attributes cluster—or correlate—such that those with more education also have higher incomes, better language abilities, and a greater chance of home ownership, a true evaluation of micro-level explanations requires statistical techniques that control for intercorrelations.

The Portuguese in North America: A Quasi-Experimental Group The ideal way to evaluate individual-level explanations of integration outcomes would involve experimental manipulation: to eliminate the bias of state- and self-selection, we would randomly assign a group of individuals to migrate either to Canada or to the United States. If we subsequently found differences in political behavior, we could be certain that such variation stemmed from the different experimental treatment—living in one country versus the other—rather than from a nonrandom distribution of personal attributes.

Practical and ethical considerations bar such a course of action. Instead, we can turn to “quasi-experiments” by considering groups with very similar migration patterns to Canada or the United States. One such group is the Portuguese. In both the United States and Canada, approximately 60–70 percent hail from the Azores, while another 20–30 percent come from mainland Portugal, often from the Lisbon area or northern Portugal. Smaller groups come from Madeira or Portugal's former African colonies. Most arrived in North America in the late 1960s or early 1970s.⁵⁸

Interregional differences exist between Portuguese immigrants, but the overall picture is of broad similarities. Portuguese immigration is largely ethnically homogeneous, and almost all are Roman Catholic.⁵⁹ Before moving to North America, the majority of Portuguese engaged in subsistence farming, fishing, or manual labor. Many have low levels of education since free schooling only extended to grade four under the Portuguese dictator-

ship, in place until 1974.⁶⁰ Nonetheless, Portuguese workforce participation rates in North America resemble those of the native born. Many are employed in manual and semiskilled jobs, such as cleaning, factory work, and construction.⁶¹

Almeida (2000) concludes that Portuguese communities in Canada and the United States are largely interchangeable, and census data support this observation (Bloemraad 2002). We find that for most individual characteristics, including education, age, marital status, length of residence, and business ownership, little distinguishes those living in the United States from their compatriots north of the border. Only three differences stand out. First, Portuguese-born adults in Canada are more likely to be citizens than their American counterparts. Second, more people in Canada report being unable to speak English.⁶² Finally, median income in Canada is higher than in the United States, though the gap is less than for the entire foreign-born population. Income differentials might partially stem from different rates of unionization in Canada and the United States (Reitz 1998). In Canada's urban centers, many Portuguese men have found employment in the construction trades, often in unionized positions, generating a decent income despite low levels of education. In the United States, fewer Portuguese work nonresidential construction, and they appear less likely to be members of a union. The difference in income probably also drives the higher level of home ownership in Canada, although this difference is characteristic of the total immigrant population in the two countries.

If we cannot use experimental methods, we can use statistical modeling to rule out some of the possible effects of the immigration system and migrant self-selection. Statistical modeling artificially attempts to replicate random assignment in experiments by comparing individuals who are alike on a range of potential explanatory factors and assessing whether differences on one specific variable correlate with variation in the outcome.

Census data allow such analysis of Portuguese immigrants (Bloemraad 2002). As suggested by research on other immigrant groups, people who have spent more years in the host country and who have better English skills are more likely to have naturalized. We also find that Portuguese immigrants with more education are more likely to acquire citizenship and that income is positively correlated with citizenship.⁶³ When it comes to age, we see a curvilinear relationship: those who are middle aged are more likely to be citizens than young adults or the very old. As Portes and Curtis (1987) found in the case of Mexican immigrants, home ownership is positively correlated with naturalization, as is business ownership. There is a positive relationship between marital status and citizenship, but we find no signifi-

cant statistical relationship between sex and naturalization. Men do not appear any more likely than women to have naturalized. All of these relationships hold, regardless of whether an immigrant lives in Canada or the United States.

Yet even after holding all these factors constant—individual attributes that might be distributed unequally in North America because of immigration policy and destination choices—living in Canada exerts a strong, positive effect on the likelihood of being a naturalized citizen. Statistically predicted probabilities of naturalization can vary from 1 (absolute certainty of citizenship) to 0 (absolute certainty of no citizenship). The likelihood of citizenship for an average Portuguese immigrant living in the United States is .47. Living in Canada raises the estimated probability to .70, an increase of 47 percent.⁶⁴

A similar analysis with similar results can be done for the Portuguese communities of Massachusetts and Ontario, the sites of the in-depth community studies I detail in coming chapters. Table 4 provides examples of how key individual attributes change the probability that a Portuguese immigrant has naturalized. The first column describes the type of change; the second reports the increase in the estimated probability of citizenship. The final column provides a 95 percent confidence interval around the probability estimate.⁶⁵ Education is critical in explaining citizenship: holding a high school diploma increases the probability of being a citizen .16 compared to only possessing primary schooling, and being a university graduate further increases the probability of citizenship by .19. Years of residence and English proficiency also show noteworthy increases in the likelihood of naturalization. In comparison, home ownership only increases the probability of citizenship by .04. These results support the contention that immigrants' characteristics influence naturalization, as the bulk of North American research suggests.

However, personal characteristics fail to explain the cross-national citizenship gap. Even controlling for individual characteristics, living in Ontario boosts the probability of citizenship .22, virtually the same advantage we find at the national level. The effect of residence is comparable to the strongest and most consistent individual-level predictors.

Indeed, we find that the impact of personal characteristics *varies* depending on whether an immigrant lives in Ontario or Massachusetts. The bottom of table 4 reports changes in expected citizenship probabilities by place of residence for different explanatory variables—education, English proficiency, and years of residence. Residing in Ontario increases the probability of being a citizen much more for someone with an elementary school edu-

TABLE 4. EFFECTS OF A CHANGE IN THE EXPLANATORY VARIABLE ON THE PROBABILITY OF BEING A CITIZEN
Portuguese-born adults in Massachusetts and Ontario, 1990 and 1991

<i>Variable Change*</i>	<i>Probability Increase</i>	<i>95 Percent Confidence Interval</i>
<i>Individual Attribute Effects</i>		
Years of Residence		
From 12 years to 20 years	0.20	(0.18, 0.22)
English Language Ability		
From unable to able to speak English	0.30	(0.26, 0.34)
Education		
From grade 8 or less to high school graduate	0.16	(0.12, 0.20)
From high school to university graduate	0.19	(0.12, 0.25)
Home Ownership		
From being a renter to a home owner	0.04	(0.01, 0.07)
<i>Place of Residence Effect (MA to ON)</i>		
Moving from MA to ON (average effect)	0.22	(0.18, 0.24)
Someone with a grade 8 education or less	0.23	(0.20, 0.26)
A university graduate	0.14	(0.10, 0.17)
An English speaker	0.20	(0.17, 0.22)
Someone unable to speak English	0.22	(0.19, 0.25)
Someone with 10 years of residence	0.22	(0.19, 0.25)
Someone with 25 years of residence	0.17	(0.15, 0.19)

* First difference results are calculated using median income and median years of residence, level of education at high school completion, and putting all other variables at their mean.

SOURCES: Author's calculations from 1990 U.S. census 5 percent Public Use Microdata Sample (Ruggles et al., 2004) and 1991 Canadian census Public Use Microdata (Statistics Canada 1995).

cation compared to someone with a university degree (.23 versus .14). This effect makes sense when we consider the stronger correlation between education and citizenship in the United States discussed earlier. The finding hints that something in the Canadian context facilitates naturalization among those with less education to a greater extent than in the U.S. context. The same observation holds when we compare more recent migrants to longtime residents. The advantage of living in Ontario decreases over time, but it remains surprisingly high—more than four times the increase in

probability from owning a home—even after twenty-five years in North America. Not only does place of residence matter for naturalization, but living in Canada appears to facilitate political incorporation, as measured by citizenship, more for those who have the least amount of education and have spent less time in North America.

In contrast, living in Ontario or Massachusetts makes little difference when we compare those unable to converse in English with those able to do so; the change in the probability of being a citizen is .22 versus .20, respectively. We can infer that barriers for those unable to speak English—notably the legal language requirement for citizenship in both countries—have a similar effect in Canada and the United States.

Another way to understand the effect of residence on citizenship is to imagine a “typical” Portuguese immigrant: a person who migrated to North America in 1970 or 1971 at the age of twenty-four, who speaks English but only has completed elementary school, and who earns the median income of any Portuguese immigrant. Statistical simulation predicts that there is a 68 percent chance that this immigrant, living in Ontario, has acquired Canadian citizenship. The likelihood that the same person, living in Massachusetts, possesses American citizenship is 46 percent. While personal characteristics affect citizenship status, where an immigrant lives matters as much or even more.

The Portuguese represent a unique opportunity to probe cross-national integration differences since the migration history and background of Portuguese immigrants to Canada and the United States are so similar. The migration experiences of other immigrant groups differ more. We can still employ statistical modeling in these cases, but the potential for bias from omitted variables is higher.⁶⁶ With this caveat in mind, we can compare four groups with a significant presence on either side of the forty-ninth parallel: Chinese from the People’s Republic of China, Haitians, Jamaicans, and individuals born in the former Soviet Union. These groups are noteworthy because of their large numbers and because they entered North America under different migration statuses. These different statuses provide varying degrees of government support. A model of structured mobilization predicts that the effect of place of residence will vary with the degree of government support received.

In each case, residing in Canada has a significant, positive effect on the odds of being naturalized. The residence advantage varies among the groups. It is highest for Haitians, increasing the probability of citizenship by .62 (from .26 in the United States to .88 in Canada), and lowest for those born in the Soviet Union, only augmenting the predicted probability by .04 (from

a very high .93 in the United States to .97 in Canada). This corresponds to varying governmental responses. Haitian migrants to Canada were generally accorded a warm welcome out of sympathy with political instability in their homeland and a sense of language commonality with French-speaking Canada. Many received some settlement assistance once in Canada. In the United States, most Haitians were denied status as asylum seekers prior to the early 1990s and received little help from the American government.⁶⁷ In contrast, people born in the former Soviet Union are mostly cold war migrants. They benefited from assistance in both Canada and the United States.⁶⁸ Jamaicans and Chinese migrants sit between these extremes. Individuals from Jamaica and China tend to enter both countries as regular immigrants, a status that generates some government assistance in Canada but little support in the United States, since immigrants there are expected to make their own way or rely on family, friends, and private organizations. For these groups, the advantage of Canadian residence is seen in an increase in the probability of citizenship of .34 for Jamaicans (from .49 to .83) and .41 for the Chinese (from .48 to .89). The recurrent significance of place of residence suggests that something about living in Canada promotes citizenship acquisition. The variation in this effect hints that the reception governments accord to particular groups might be behind such differences.

*Existing Macro-Level Explanations:
The Legal Structure of Citizenship*

Various researchers point out that laws channel individuals' interest in citizenship and their ability to naturalize. From the point of view of rational choice theory, the benefits of Canadian citizenship and/or costs of naturalizing in the United States must make Canadian citizenship more attractive.⁶⁹ Alternatively, a political opportunity approach suggests that American citizenship regulations must be more onerous than Canadian ones, making it harder to naturalize.⁷⁰ The first argument suggests that laws related to citizenship influence immigrants' motivations to naturalize; the second highlights how legal structures can hinder immigrants' ability to acquire citizenship.

It is difficult to sustain the argument that the advantages of citizenship are higher in Canada. In the five decades following World War II, individuals increasingly access state-controlled rights and benefits through "personhood," not citizenship.⁷¹ By the mid-1990s, the principal benefits of citizenship were the same in both countries: access to certain public sector jobs, absolute right of entry (and thus protection from deportation in the event of a criminal conviction), the ability to travel with an American or

Canadian passport, and the right to vote or run for elected office. Although noncitizen immigrants in the United States face new restrictions with the passage of the 1996 Welfare Reform Act, prior to this legislation both countries made few distinctions for public benefits based on citizenship, especially for those with legal permanent residence status.⁷²

If anything, the benefits of citizenship appear greater in the United States, and not only because access to certain means-tested programs is now denied to noncitizens. American citizens may petition for a wider range of relatives to immigrate to the United States than resident aliens (Jasso and Rosenzweig 1990). Only citizens can sponsor brothers and sisters, and the petitions of citizens sponsoring spouses and children get approved more quickly than those of permanent residents. In Canada, a permanent resident's ability to sponsor relatives is not affected by citizenship status. In fact, a proposal to link sponsorship and citizenship put forward in the 1966 White Paper on Canadian Immigration Policy received significant criticism from the Special Joint Committee of the Senate and House of Commons, in part for attaching "a utilitarian value" to citizenship (Hawkins 1988: 161). The proposal quickly died.⁷³ Since family reunification is an important goal for many immigrant families, a pure cost-benefit analysis would predict higher citizenship levels in the United States.

It is also difficult to argue that the laws and regulations governing naturalization are more onerous in the United States than in Canada. Historically, both countries have adopted liberal citizenship policies and, as table 5 demonstrates, contemporary naturalization regulations are similar: costs are relatively low, required residency periods are short, and both nations administer language and knowledge exams. The main discrepancies are a slightly longer residency requirement in the United States and Canada's acceptance of dual citizenship.

Since 1977 immigrants in Canada need to wait only three years before applying for citizenship. The United States generally requires five years of residence, although the spouses of American citizens can apply after three years, and those who see active military service face only a year or even no residence requirement. The residency difference can explain gaps in citizenship acquisition among very recent cohorts, but it fails to explain the persistence of such gaps. If residency requirements were the only barrier to naturalization, we would expect U.S. citizenship levels to quickly catch up to those in Canada for later cohorts. Instead, it takes over thirty years for the gap to narrow substantially.

A second regulatory difference concerns dual citizenship. The original legislation establishing Canadian citizenship in 1947 did not require a

TABLE 5. REQUIREMENTS FOR NATURALIZATION
IN THE UNITED STATES AND CANADA

<i>United States</i>	
Minimum age	Eighteen years
Status	Must be a legal permanent resident
Residency requirement	Must have lived in the United States for at least five years, with absences totaling no more than one year, and have residence in one state for at least three months*
Language requirement	Must show ability to read, write, speak, and understand "ordinary" English (exceptions: those older than fifty-five living in the United States fifteen years or more, or those older than fifty living in the United States twenty years or more)
Knowledge requirement	Must demonstrate knowledge and understanding of fundamentals of U.S. history and government ("special consideration" is given to those with impairments or older than sixty-five with at least twenty years of residence)
Grounds for refusal	Certain criminal offenses, and/or a failure by the candidate to show that he or she is of "good moral character"
Oath of allegiance	Required
Cost	U.S.\$330 per application (does not include U.S.\$70 fingerprint fee)**
Dual citizenship	The oath of allegiance includes a phrase renouncing "foreign allegiances"

* A number of exceptions exist. The most common is for the spouses of U.S. citizens, who may apply after three years of residence. Those who saw active military service in the U.S. armed forces have no residence requirement.

** Fee information is accurate as of April 30, 2004. The current U.S. fee is more than triple the amount it was when I started my fieldwork in 1996. Then immigrants paid U.S.\$95 to file the N-400 form.

renunciation of previous nationalities, but it did stipulate that individuals who adopted another citizenship once they were Canadian lost their Canadian status (Galloway 2000). Thus, immigrants to Canada could theoretically hold dual nationality upon naturalization, but Canadians who migrated elsewhere would lose Canadian citizenship if they acquired another citizenship. The 1977 Citizenship Act eliminated this provision—apparently without any debate in Parliament—ushering in "a wholly permissive stance

TABLE 5. (continued)

<i>Canada</i>	
Minimum age	Eighteen years
Status	Must be a legal permanent resident
Residency requirement	Must have lived in Canada for at least three of the previous four years before application (before February 15, 1977, the requirement was five years)
Language requirement	Must show oral ability in English or French and, depending on the judge, some reading and writing ability
Knowledge requirement	If between the ages of eighteen and fifty-nine, must show basic knowledge of Canada (history, geography, political institutions)
Grounds for refusal	Certain criminal offenses, as well as being deemed a security danger
Oath of allegiance	Required
Cost	C\$200 per adult; C\$100 per child; if citizenship is refused, C\$100 of the adult fee is reimbursed
Dual citizenship	Allowed since February 15, 1977

SOURCES: Author's compilation; Citizenship and Immigration Canada website: www.cic.gc.ca/english/citizen/menu-howto.html (last accessed January 5, 2006); U.S. Citizenship and Immigration Services website: <http://uscis.gov/graphics/services/natz> (last accessed January 5, 2006).

on the issue of multiple nationality" (Galloway 2000: 99). In contrast, the American oath of allegiance requires all adult would-be citizens to swear the following: "I absolutely and entirely renounce and abjure all allegiance and fidelity to any foreign prince, potentate, state, or sovereignty of whom or which I have heretofore been a subject or citizen." Some contend that the absence of legal dual citizenship prevents immigrants from naturalizing (Hammar 1990; Jones-Correa 1998a). For some immigrants, it is argued, the

attractions of the new country's citizenship cannot compensate for the lost benefits or psychic costs associated with giving up the old nationality.

Dual citizenship is important to some immigrants, but the American oath of allegiance, by itself, only explains a small amount of the variation in Canadian and American naturalization patterns. There are at least three reasons why this is so.⁷⁴ First, although American law formally demands that the naturalizing immigrant renounces his or her former citizenship, in practice the INS and State Department almost never take action if a new American uses his or her former passport outside the United States. As one INS official explained, "Dual citizenship from our point of view is not really a problem. We're in the business of saying who's a U.S. citizen or not. And whether some other country also recognizes that person, we basically think that it's an issue of that country's domestic law. And so, it's really not a big concern for us."⁷⁵ The State Department denationalized some Americans who took another country's citizenship in the 1950s and 1960s (Finifter and Finifter 1995), but court rulings such as *Afroyim v. Rusk* and *Vance v. Terrazas* made dual citizenship legal for the American born. The legal position of naturalized citizens is less clear, but in practice they can keep a former nationality.⁷⁶

Second, foreign governments are not required to recognize would-be Americans' renunciation of former nationalities, and in many cases they do not recognize it. Many immigrants consequently find themselves dual citizens without any affirmative action on their part. For example, if a Portuguese immigrant today swears the oath of allegiance and becomes an American citizen, the state of Portugal continues to consider that person a Portuguese national. Indeed, countries increasingly promote dual citizenship to keep emigrants tied to the homeland (Basch, Glick Schiller, and Szanton Blanc 1994; Jones-Correa 2001a; Levitt 2001). The former president of Portugal, Dr. Mario Soares, is widely quoted by Portuguese American activists as having said, "The best way to be a good Portuguese citizen in the United States is to be a good American citizen."⁷⁷ U.S. officials recognize this phenomenon and, to some extent, embrace it, since it allows them to avoid the politically sensitive issue of multiple nationalities. Reflecting on her time as INS commissioner, Doris Meissner explained, "[Dual citizenship] was unlikely to change as a matter of U.S. policy, and we really didn't need to raise it because other countries were changing their policies rather rapidly."⁷⁸

Finally, for most immigrants who plan to remain in the United States or Canada, the critical issue is not whether the host country recognizes dual citizenship, but whether the home country does. The benefits of naturalization are assured in the adopted country. In contrast, an immigrant might be

very worried about property rights and other benefits tied to citizenship in the country of origin. From a purely practical standpoint, the immigrants' concern is whether the sending country recognizes dual nationality, not the United States or Canada.⁷⁹

The stories of two Portuguese immigrants illustrate this calculation. In 1981 Portugal allowed dual nationality and permitted former Portuguese nationals to regain Portuguese citizenship if they had lost it after naturalization. Joaquim, who acquired American citizenship in the 1990s, explained why he had not naturalized in the 1970s: "I didn't want to trade in my Portuguese citizenship. [Now] I won't lose anything, so I decided to go ahead and apply for [U.S.] citizenship." Martin was in the process of naturalizing when I interviewed him, and he offered a similar logic: "Another thing that has made me decide with no hesitation is the fact that becoming a U.S. citizen, I can still be Portuguese. And that influences me a lot. . . . Right now I know that for as long as I live in the United States, I am a U.S. citizen, once I become naturalized. But if I retire and go to Portugal, I am Portuguese. Which I think is great. We don't lose anything." Clearly both men do not consider the oath of allegiance a major obstacle to naturalization. Rather, they worry about the laws of their home country. Since I compare the same immigrant groups in Canada and the United States, I control for the influence of homeland nationality laws. It is unlikely that legal differences in the American and Canadian approach to dual citizenship explain the naturalization gap. The puzzle remains.

WINNING ELECTIONS

I have spent considerable time on citizenship because it is such a basic step in immigrants' political incorporation. Those interested in politics can also participate as noncitizens, writing to officials, speaking out on political issues, joining in demonstrations, or otherwise trying to influence the political process. Nevertheless, core political activities—such as voting and running for office—are almost exclusively tied to citizenship.⁸⁰ Although immigrants can acquire citizenship for reasons unrelated to political participation, such as wanting the security of guaranteed residence or access to certain jobs, political actors tend to treat the foreign-born citizen differently from the noncitizen, encouraging the use of new political rights. The new citizen suddenly becomes a target of electoral or fund-raising campaigns and can participate in referenda or local ballot initiatives.

Unfortunately, at this juncture it is almost impossible to compare immigrants' voting behavior in Canada and the United States. Most voting sur-

veys contain too few foreign-born respondents to allow for statistical comparison, especially of subgroups identified by country of origin, and most fail to ask critical immigration-related questions such as country of birth or length of residence.

We can, however, compare another indicator of immigrants' political integration: the number of foreign-born politicians elected to national legislature. Holding elected office is an extreme form of political participation—only a minute proportion of the general population ever runs for election, much less sits in office—but it is a revealing one. The election of foreign-born individuals can signal immigrant voting strength, at least in the candidate's riding or district, and it can indicate ordinary citizens' acceptance of the foreign born in the political process. Foreign-born politicians often become a symbol that a certain community has "arrived" in politics, not only for the immigrant community but also for those in the mainstream. They can serve as role models and spokespeople for immigrants or as a lightning rod for criticism.

The United States and Canada figure among only a handful of countries where the presence of foreign-born individuals in national legislative bodies is not considered abnormal or dangerous. While the writers of the U.S. Constitution were sufficiently suspicious of foreigners to make the office of the presidency the only position in the United States closed to naturalized citizens, foreign-born citizens are welcome in all other political positions. In Canada, given its longer membership in a multinational empire, native birth has never been a requirement for office holding. Indeed, Canada's first prime minister, Sir John A. Macdonald, was born in Scotland, and a number of subsequent prime ministers also claimed birthplaces outside Canada.⁸¹

Asking whether immigrants succeed in gaining national office carries with it the assumption that a politician's biography matters. This is not necessarily an obvious proposition. In the American and Canadian political systems, one person is chosen from a particular area to speak for its residents. Such representation can take a variety of forms. Two common types are statistical and substantive representation.⁸² Under statistical representation, the membership of a municipal council or legislative body should mirror central lines of diversity in the general population: if women constitute half the population, they should hold half of all seats; if an ethnic minority makes up 10 percent of the population, this percentage should be reflected in the elected body. If a system is fair and all groups have equal interest in office holding, the legislature's composition should roughly mirror that of the general population. Support for "mirror" representation is in part pred-

icated on the belief that someone from inside the group better understands community concerns than someone outside it.

Substantive representation instead suggests that an elected official can represent diverse individuals' policy interests regardless of personal characteristics. Since no one person can reflect the statistical makeup of an area's voters, the most a politician can do is reflect the dominant views and opinions of those who elected him or her. From the point of view of substantive representation, an elected official does not need to be an immigrant in order to support or promote issues of concern to immigrant communities.

The latter has certainly been true in a variety of times and places in Canada and the United States. Nonimmigrant politicians listen to immigrant concerns, take up those concerns in variety of arenas, and succeed in passing legislation that might be of particular benefit to foreign-born residents. A comparative, historical analysis of substantive representation is, however, extremely difficult, because it demands a definition of what an "immigrant" issue is. Immigrants, like the general population, are a heterogeneous group. Just like Americans or Canadians who live in the same society but hold very different political views, immigrants from the same origins differ in their views on the economy, the role of government, social issues, and even the appropriate level and composition of future immigration streams.

Instead of trying to navigate such contentious terrain, I focus on statistical representation. The vast majority of Portuguese and Vietnamese immigrants with whom I spoke look favorably on the idea of having one or more people from the community serve as elected representatives. While a few qualify their views by commenting on incompetent coethnic politicians, almost all see value in statistical representation. Newcomers believe that coethnic politicians better understand the interests of the community and take these interests to heart; that ethnic representation offers immigrants a point of access into the political system; and that coethnic representatives serve an important symbolic function.⁸³

Furthermore, one would expect that in a political system in which all individuals have equal access to office, those elected *should* look more or less like the general population. Although only a small proportion of any group of people might be sufficiently passionate about public affairs to campaign for office, there is no reason to believe that the distribution of political passion is found only in some groups (e.g., men, the native born) and not in others.⁸⁴ Of course politics, like most social institutions, does not provide equal access to all types of people—wealth and education are two charac-

teristics overrepresented in elected bodies. But theoretically, beyond an initial adjustment and socialization period, there is reason to expect immigrants to become interested and engaged in politics, including running for office. Ideally, the proportion of foreign-born individuals in the U.S. Congress or Canadian Parliament should mirror the proportion in the general population. Do patterns of office holding reinforce the picture already painted by citizenship data?

Continued Divergence: Immigrant Politicians in National Office

Both the United States and Canada have bicameral systems at the federal level: the national legislature is made up of two bodies, the House and the Senate. The structure of the two houses is similar: each country is divided into constituencies (districts in the United States; ridings in Canada), and one person is elected by the residents of each constituency to be the area's representative. The two senates differ. The Canadian Senate is an appointed body. The prime minister nominates a senator to the sovereign (in reality to the Queen's representative, the governor general) for approval.⁸⁵ In the United States, the Constitution originally gave state legislatures the power to select senators, but with the passage of the Seventeenth Amendment in 1913, this power was transferred to the voters of a state.⁸⁶ Given senate differences, I focus on the proportion of foreign-born individuals sitting in the U.S. House of Representatives and the Canadian House of Commons in the twentieth century.

We find a pattern largely analogous to the one for citizenship. If election to the legislature were equally accessible, the proportion of foreign-born members of each house should reflect the proportion of the foreign born in the general population. Dividing the first proportion by the second allows us to calculate an index of representation. For example, in 2001, there were forty-five members of the House of Commons born outside Canada, a number that represented 15 percent of the total seats in the House. Since the percentage of foreign-born individuals in the population that year stood at 19 percent, the ratio of representation in the House to the general population is 15 to 19, for a representation index of .78. In comparison, the U.S. House of Representatives only included 8 foreign-born individuals in 2000, out of a total of 435 seats. The percentage of foreign-born individuals in the House, 1.8, stood much lower than the 11 percent of the population born outside the United States, for an index of representation of .17. An index of one signals parity between the composition of the population and the House. A lower number indicates underrepresentation and a higher number suggests more representation than we would expect.⁸⁷

As with citizenship, the current discrepancy in representation between Canada and the United States did not always exist. In 1911, 16 sitting members of the 261-seat House of Commons were foreign born (7.2 percent), compared to 21 of 391 representatives in the U.S. House (5.4 percent) in 1910. While the proportion of foreigners was higher in Canada, it represented a lower percentage than the proportion of foreign born in the general population, which stood at 22 percent and 15 percent, respectively, in Canada and the United States. Thus the index of representation was higher in the United States, at .37, than in Canada, at .33, in the early part of the twentieth century.

The comparison of statistical representation carries a number of interpretative issues. The first and most important issue is determining whether a foreign-born representative can be considered an immigrant. Both Canada and the United States allow citizen parents living overseas to register their foreign-born children as citizens. From a legal perspective, these foreign-born citizens are *not* immigrants if they return to their parents' home country. Socially and culturally, we might consider these children to be more like other Canadians and Americans or more like other immigrants, depending on the amount of time they spend abroad and their family's roots in North America. For instance, the only foreign-born senator sitting in the U.S. Congress in 2000 was John McCain of Arizona. McCain was born in the Panama Canal Zone while his father was serving in the U.S. Navy. The son and grandson of decorated U.S. admirals, few would classify McCain as an immigrant, and because he received American citizenship at birth, McCain is eligible for the presidency. Analogous stories are found among Canadian foreign-born members of Parliament (MPs).

Unfortunately, we lack detailed personal histories for many of the hundreds of foreign-born individuals who served in national legislatures. Beyond the most prominent politicians, there are surprisingly few records that detail the citizenship of politicians' parents or the age at which they came to North America. We must therefore treat foreign birth as an imperfect proxy for immigration status. This means that we overestimate immigrant representation in Congress and Parliament since we include some individuals who are, for all intents and purposes, similar to the native born. Since the presence of individuals like McCain does not seem to be more prevalent in the United States or Canada, we can consider differences in the two countries' representation ratios as indicators of political incorporation.

We must also deal with a second issue, Canada's former use of British subjecthood. Given that Canada did not adopt a separate citizenship until 1947, should we consider British migrants from England, Scotland, Wales, and,

prior to its independence, Ireland to be immigrants upon their arrival in Canada? Legally, these people were British subjects, like those born in Canada, and they enjoyed full political rights immediately after entering the country.⁸⁸ Socially and culturally, they might not have been brought up like those born in Canada. Still, strong strains of British imperialism in some segments of Canadian society might have led these individuals to be treated like native-born residents. It is unclear whether migrating British subjects should be considered akin to non-British immigrants or native-born Canadians.

We can recalculate the index of foreign-born representation in the House of Commons to count only non-British immigrants prior to 1947, as we did with the citizenship statistics. Most ratios change slightly after we compare the proportion of non-British foreign-born MPs to the proportion of the non-British foreign born in the general population. The index of representation for all foreign-born individuals, regardless of British origin, is .33 in 1911, .29 in 1921, and .53 in 1931. The recalculated ratios, excluding those born in the United Kingdom (defined as those born in England, Wales, Scotland, and Ireland), are .22, .17, and .34, respectively. The values are lower—suggesting that British migrants had an advantage in gaining access to the House of Commons—but they are not so different as to suggest that non-British immigrants were entirely shut out of national Parliament.⁸⁹

A final issue is determining which population should serve as the base line for comparison. Above, we compared the proportion of elected representatives to the foreign-born composition of the general population. Is the general population the appropriate yardstick? It might be better to compare those elected to the naturalized foreign-born population, since only citizens can vote or stand for office.⁹⁰ Not surprisingly, indices of representation improve. While the foreign-born presence in the U.S. House of Representatives in 2000 was only about a sixth (.17) of what we would expect given the proportion of foreign born in the general population, the index more than doubles to .41 if we consider the *citizen* foreign-born population. The lack of immigrant representation in Congress stems in part from low naturalization among the foreign born.

Naturalization does not explain the whole story, however, since a sizeable deficit remains between actual representation and what we would expect for perfect mirror representation. The use of the same base comparison group in Canada—that is, the foreign-born citizen population—reveals that the foreign born appear somewhat *over*represented in the House of Commons in 2001. The recalculated index of representation is 1.19. The cross-national gap in political incorporation, apparent in citizenship acquisition, also holds for elected representation.

Table 6 consequently reports three different indices of representation for the Canadian House of Commons and two for the U.S. House of Representatives. For both countries, I compare the proportion of the foreign born in the House to the proportion in the general population and to the proportion of the naturalized foreign born in the population. In the American case, some years cannot be calculated because full naturalization information is not available for 1900, 1910, or 1960. For Canada, I also calculate an index that only counts the foreign born not born in the United Kingdom.

Not surprisingly, the numbers change depending on the point of comparison, but the overall trends—over time and cross-nationally—largely remain the same. In the United States, incorporation appears stronger in the pre-World War II period than in the years since 1965. In Canada, integration patterns before and after World War II resemble each other, although political incorporation appears to pick up speed at the end of the twentieth century. Thus Canada and the United States appear roughly analogous in the 1920–40 period, but statistical representation of immigrants in the United States did not keep pace with Canada from 1970 to 2000.

A visual representation makes the patterns clearer. Figure 4 compares indices of representation in Canada and the United States over the twentieth century, using the proportion of foreign-born residents in the general population as the point of comparison. Given British subjects' unique status in Canada prior to 1947, the Canadian ratio includes only those not born in the United Kingdom from 1901 to 1941. The sharp peak in the 1951 Canadian data stems in part from the change in way the ratios are calculated.

Between 1900 and 1931 political incorporation was, on average, more successful in the United States than in Canada. Although representation in the U.S. House was only about a third or two-fifths of what we might expect, the proportion of foreign-born residents sitting in Congress was closer to the percentage in the general population than for the non-British in Canada's House of Commons. Interestingly, both countries saw an increase in foreign-born representation in 1940–41. With the Second World War raging, we might not expect the foreign born to be welcome in national legislatures. The increase in representation is dramatic in Canada and continues to 1951, although the spike is in part due to the different calculation of foreign-born residents.

Both countries see a dip in foreign-born representation in the immediate postwar period, but the Canadian figures do not fall as far as those in the United States. Unlike in the case of citizenship, U.S. foreign-born representation rises slightly in 1990, but the increase might be an anomaly. In 2000 few foreign-born individuals sat in the House of Representatives, while in

TABLE 6. REPRESENTATION OF THE FOREIGN BORN IN THE U.S. HOUSE OF REPRESENTATIVES AND THE CANADIAN HOUSE OF COMMONS, 1900-2001

<i>Year (United States)</i>	1900	1910	1920	1930	1940	1950	1960	1970	1980	1990	2000
No. seats in House of Representatives	357	391	435	435	435	435	435	435	435	435	435
No. foreign born elected to House	18	21	19	16	17	10	7	1	1	8	8
Percentage of foreign born in House	5.0	5.4	4.4	3.7	3.9	2.3	1.6	0.2	0.2	1.8	1.8
Percentage of foreign born in population	13.6	14.7	13.2	11.6	8.8	6.9	5.4	4.7	6.2	7.9	11.1
Index of representation^a	0.37	0.37	0.33	0.32	0.44	0.33	0.30	0.05	0.04	0.23	0.17
Percentage of foreign-born citizens in population ^b	—	—	6.1	6.5	5.5	5.0	—	3.1	3.1	3.2	4.5
Index of representation^c	—	—	0.71	0.57	0.71	0.46	—	0.08	0.07	0.57	0.41

<i>Year (Canada)</i>	1901	1911	1921	1931	1941	1951	1961	1971	1981	1990	2000
No. seats in House of Commons	213	221	235	245	245	262	264	264	282	295	301
No. sitting foreign-born MPs	24	16	15	29	33	34	21	18	24	29	45
Percentage of foreign born in House	11.3	7.2	6.4	11.8	13.5	13.0	8.0	6.8	8.5	9.8	15.0
No. sitting U.K.-born MPs	20	11	11	20	17	17	9	6	8	5	7
Percentage of non-U.K. foreign born in House	1.9	2.3	1.7	3.7	6.5	6.5	4.5	4.5	5.7	8.1	12.6
Percentage of foreign born in population	13.0	22.0	22.3	22.2	17.5	14.7	15.6	15.3	16.0	17.0	19.1
Index of representation^a	0.87	0.33	0.29	0.53	0.77	0.88	0.51	0.45	0.53	0.58	0.78
Percentage of non-U.K. foreign born in population	5.2	10.4	10.1	10.8	8.8	8.0	10.0	10.2	11.7	13.7	15.1
Index of representation^d	0.36	0.22	0.17	0.34	0.74	0.81	0.45	0.45	0.48	0.59	0.83
Percentage of foreign-born citizens in population	10.7	16.5	18.0	17.3	15.3	11.6	9.8	9.2	11.0	11.3	12.6
Index of representation^c	1.05	0.44	0.36	0.68	0.88	1.12	0.81	0.74	0.78	0.87	1.19

^a Proportion of foreign born in House divided by proportion of foreign born in population.

^b The census did not collect complete information on immigrant citizenship before 1920, and did not collect this information in 1960.

^c Proportion of foreign-born citizens in House divided by proportion of foreign-born citizens in population.

^d Proportion of non-U.K. foreign born in House divided by proportion of non-U.K. foreign born in population.

SOURCES: Author's calculations, using data compiled by author and from data provided by the Canadian Parliamentary Library and the Inter-university Consortium for Political and Social Research datafile "Roster of United States Congressional Officeholders" (1997).

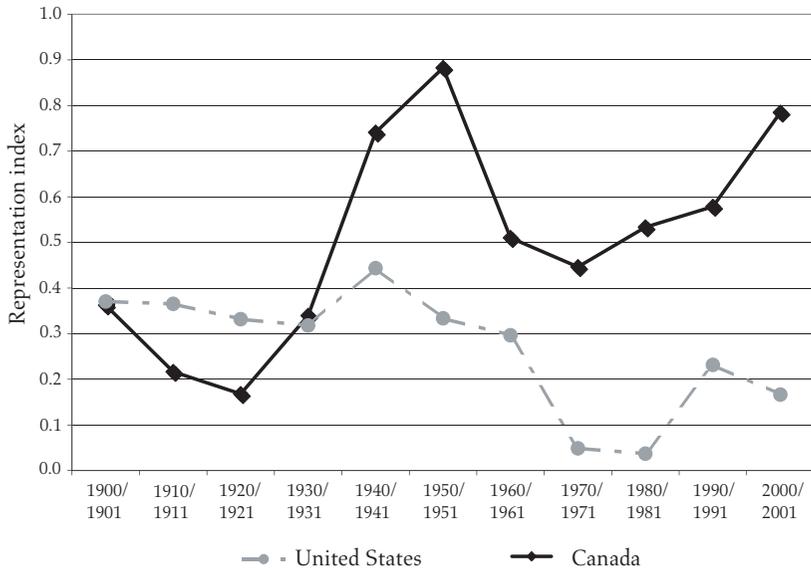


Figure 4 Representation index of foreign-born national legislators to foreign-born residents of the United States (even-numbered years) and Canada (years numbered on the '01), 1900–2001. Before 1951, Canadian data include only non-British foreign-born residents. SOURCES: ICPSR and Carroll McKibbin (1997); Parliamentary Library of Canada database of Canadian Parliamentarians and author's compilation.

Canada foreign-born legislators continued to enter the House of Commons. The data on elected representatives confirm the pattern of diverging incorporation trajectories that we saw with citizenship.

It is also worth noting the changing origins of these foreign-born politicians. Before 1951 the overwhelming majority of non-U.K. foreign-born politicians serving in the Canadian House of Commons reported an American birthplace. The next most common birthplace was France, but judging from last names, perhaps two of the four French-born MPs were actually of British origins, at least on their father's side. The most culturally "foreign" immigrants serving in the House prior to 1951 include two men born in Germany, two in Russia, one in Switzerland, one in Poland, one in Sweden, and one in Iceland. These origins reflect, in part, major sources of non-British immigration, though the relationship is not perfect, since Switzerland and Iceland were not especially significant migrant-sending countries.

People born in the United Kingdom and Canada also dominated the foreign-born contingent in the U.S. House of Representatives in the early part

of the century. In the Fifty-sixth and Sixty-first Congresses, sitting in 1900 and 1910, respectively, more than half of the foreign-born representatives claimed birthplaces in England, Wales, Scotland, or Ireland and another fifth to a quarter had been born in Canada. The next most prominent birthplace was Germany, with four elected representatives. In 1900 the foreign-born contingent was rounded off by a man born in Norway and another born in Luxembourg, while in 1910 the remainder hailed from Sweden (two), Norway (one), and Czechoslovakia (one). By 1940 those born in the United Kingdom and Canada only accounted for 45 percent of the twenty foreign-born representatives. The remainder were from Scandinavia, Germany, and Eastern Europe (Czechoslovakia, Hungary, Poland, and Romania).⁹¹

At the end of the twentieth century, foreign-born Canadian MPs came from around the globe. A bit more than the majority of the forty-five sitting MPs still reported a birthplace in Europe or the United States in 2001, but three members of Parliament were born in India, two in China, two in the Middle East (Lebanon and Syria), five in the Caribbean or Latin America, four in Africa, and one in the Philippines.⁹² In the United States, only eight representatives were foreign born in 1990 and 2000. More than half hailed from Europe in 1990, but in 2000 the European born were in the minority. In 1990 the three non-European foreign-born representatives were from Cuba, the West Indies, and Central America. In 2000 two representatives had Asian birthplaces, though we must be cautious about ascribing ethnicity or immigrant background based on birth. David Wu, born in Taiwan, is the first and only Chinese American to serve in Congress. Diane DeGette, born in Tachikawa, Japan, is not of Japanese background and proudly presents herself as a fourth-generation Coloradoan. The limited number of foreign-born representatives in the United States makes the group less globally diverse than in Canada, but as in Canada, origins go beyond the pre-World War II reliance on European-born individuals.

Thus, up until the 1960s, the political incorporation of immigrants looked quite similar in Canada and the United States. This is the case whether we consider citizenship or election to national office. Patterns diverge in the final decades of the twentieth century, with greater signs of political integration in Canada than in the United States. More foreign-born individuals serve as representatives in the Canadian House of Commons, and a much greater proportion of immigrants residing in Canada take out citizenship. Variation in naturalization regulations or the costs and benefits of citizenship are not substantial enough to account for these differences. The sorting of immigrants to the two countries—by country of origin and by personal

characteristics—explains some of the difference, but a large gap remains even after we control for such variation.

We need to go beyond immigrants' skills, interests, and resources to understand the social nature of political incorporation and the role of institutional arrangements and government policies in shaping incorporation experiences. Citizenship seems to vary by migrant group in a manner consistent with the level of government support a group receives. Indeed, researchers from the Urban Institute have estimated that refugees in the United States are one and a half times more likely to take up American citizenship than eligible nonrefugee legal immigrants with similar personal characteristics (Fix, Passel, and Sucher 2003: 6). We also find a weaker correlation in Canada between citizenship and education, implying that something in the Canadian context attenuates the barriers faced by those with less schooling or encourages them to naturalize more. This leveling of citizenship probabilities stands in sharp contrast to Louis DeSipio's analysis of the United States, where "the contemporary process of immigrant political adaptation has not only shifted from a group focus to an individual focus, but it has also incorporated the class and education bias that shapes political participation more generally in American society" (2001: 69). Government intervention might level some of these biases.