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What Does It Mean to Be an American?

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What does it mean to be an American?

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It is often said that being an American means sharing a commitment to a set of values and ideals.¹ Writing about the relationship of ethnicity and American identity, the historian Philip Gleason put it this way:

To be or to become an American, a person did not have to be any particular national, linguistic, religious, or ethnic background. All he had to do was to commit himself to the political ideology centered on the abstract ideals of liberty, equality, and republicanism. Thus the universalist ideological character of American nationality meant that it was open to anyone who willed to become an American.²

To take the motto of the Great Seal of the United States, *E pluribus unum* – "From many, one" – in this context suggests not that manyness should be melted down into one, as in Israel Zangwill's image of the melting pot, but that, as the Great Seal's sheaf of arrows suggests, there should be a coexistence of manyin-one under a unified citizenship based on shared ideals.

Of course, the story is not so simple, as Gleason himself went on to note. America's history of racial and ethnic exclu-

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sions has undercut the universalist stance; for being an American has also meant sharing a national culture, one largely defined in racial, ethnic, and religious terms. And while solidarity can be understood as "an experience of willed affiliation," some forms of American solidarity have been less inclusive than others, demanding much more than simply the desire to affiliate.³ In this essay, I explore different ideals of civic solidarity with an eye toward what they imply for newcomers who wish to become American citizens.

Why does civic solidarity matter? First, it is integral to the pursuit of distributive justice. The institutions of the welfare state serve as redistributive mechanisms that can offset the inequalities of life chances that a capitalist economy creates, and they raise the position of the worst-off members of society to a level where they are able to participate as equal citizens. While self-interest alone may motivate people to support social insurance schemes that protect them against unpredictable circumstances, solidarity is understood to be required to support redistribution from the rich to aid the poor, including housing subsidies, income supplements, and long-term unemployment benefits.⁴ The underlying idea is that people are

more likely to support redistributive schemes when they trust one another, and they are more likely to trust one another when they regard others as like themselves in some meaningful sense.

Second, genuine democracy demands solidarity. If democratic activity involves not just voting, but also deliberation, then people must make an effort to listen to and understand one another. Moreover, they must be willing to moderate their claims in the hope of finding common ground on which to base political decisions. Such democratic activity cannot be realized by individuals pursuing their own interests; it requires some concern for the common good. A sense of solidarity can help foster mutual sympathy and respect, which in turn support citizens' orientation toward the common good.

Third, civic solidarity offers more inclusive alternatives to chauvinist models that often prevail in political life around the world. For example, the alternative to the Nehru-Gandhi secular definition of Indian national identity is the Hindu chauvinism of the Bharatiya Janata Party, not a cosmopolitan model of belonging. "And what in the end can defeat this chauvinism," asks Charles Taylor, "but some reinvention of India as a secular republic with which people can identify?"⁵ It is not enough to articulate accounts of solidarity and belonging only at the subnational or transnational levels while ignoring senses of belonging to the political community. One might believe that people have a deep need for belonging in communities, perhaps grounded in even deeper human needs for recognition and freedom, but even those skeptical of such claims might recognize the importance of articulating more inclusive models of political community as an alternative to the racial, ethnic, or religious narratives that have permeated

political life.⁶ The challenge, then, is to develop a model of civic solidarity that is "thick" enough to motivate support for justice and democracy while also "thin" enough to accommodate racial, ethnic, and religious diversity.

We might look first to Habermas's idea of constitutional patriotism (Verfassungspatriotismus). The idea emerged from a particular national history, to denote attachment to the liberal democratic institutions of the postwar Federal Republic of Germany, but Habermas and others have taken it to be a generalizable vision for liberal democratic societies, as well as for supranational communities such as the European Union. On this view, what binds citizens together is their common allegiance to the ideals embodied in a shared political culture. The only "common denominator for a *constitutional* patriotism" is that "every citizen be socialized into a common political culture."7

Habermas points to the United States as a leading example of a multicultural society where constitutional principles have taken root in a political culture without depending on "all citizens' sharing the same language or the same ethnic and cultural origins."8 The basis of American solidarity is not any particular racial or ethnic identity or religious beliefs, but universal moral ideals embodied in American political culture and set forth in such seminal texts as the Declaration of Independence, the U.S. Constitution and Bill of Rights, Abraham Lincoln's Gettysburg Address, and Martin Luther King, Jr.'s "I Have a Dream" speech. Based on a minimal commonality of shared ideals, constitutional patriotism is attractive for the agnosticism toward particular moral and religious outlooks and ethnocultural identities to which it aspires.

What does constitutional patriotism suggest for the sort of reception immigrants should receive? There has been a general shift in Western Europe and North America in the standards governing access to citizenship from cultural markers to values, and this is a development that constitutional patriots would applaud. In the United States those seeking to become citizens must demonstrate basic knowledge of U.S. government and history. A newly revised U.S. citizenship test was instituted in October 2008 with the hope that it will serve, in the words of the chief of the Office of Citizenship, Alfonso Aguilar, as "an instrument to promote civic learning and patriotism."9 The revised test attempts to move away from civics trivia to emphasize political ideas and concepts. (There is still a fair amount of trivia: "How many amendments does the Constitution have?" "What is the capital of your state?") The new test asks more open-ended questions about government powers and political concepts: "What does the judicial branch do?" "What stops one branch of government from becoming too powerful?" "What is freedom of religion?" "What is the 'rule of law'?"¹⁰

Constitutional patriots would endorse this focus on values and principles. In Habermas's view, legal principles are anchored in the "political culture," which he suggests is separable from "ethicalcultural" forms of life. Acknowledging that in many countries the "ethical-cultural" form of life of the majority is "fused" with the "political culture," he argues that the "level of the shared political culture must be uncoupled from the level of subcultures and their prepolitical identities."11 All that should be expected of immigrants is that they embrace the constitutional principles as interpreted by the political culture,

not that they necessarily embrace the majority's ethical-cultural forms.

Yet language is a key aspect of "ethical-cultural" forms of life, shaping people's worldviews and experiences. It is through language that individuals become who they are. Since a political community must conduct its affairs in at least one language, the ethical-cultural and political cannot be completely "uncoupled." As theorists of multiculturalism have stressed, complete separation of state and particularistic identities is impossible; government decisions about the language of public institutions, public holidays, and state symbols unavoidably involve recognizing and supporting particular ethnic and religious groups over others.¹² In the United States, English language ability has been a statutory qualification for naturalization since 1906, originally as a requirement of oral ability and later as a requirement of English literacy. Indeed, support for the principles of the Constitution has been interpreted as requiring English literacy.¹³ The language requirement might be justified as a practical matter (we need some language to be the common language of schools, government, and the workplace, so why not the language of the majority?), but for a great many citizens, the language requirement is also viewed as a key marker of national identity. The continuing centrality of language in naturalization policy prevents us from saying that what it means to be an American is purely a matter of shared values.

Another misconception about constitutional patriotism is that it is necessarily more inclusive of newcomers than cultural nationalist models of solidarity. Its inclusiveness depends on which principles are held up as the polity's shared principles, and its normative substance depends on and must be eval-

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uated in light of a background theory of justice, freedom, or democracy; it does not by itself provide such a theory. Consider ideological requirements for naturalization in U.S. history. The first naturalization law of 1790 required nothing more than an oath to support the U.S. Constitution. The second naturalization act added two ideological elements: the renunciation of titles or orders of nobility and the requirement that one be found to have "behaved as a man ... attached to the principles of the constitution of the United States."14 This attachment requirement was revised in 1940 from a behavioral qualification to a personal attribute, but this did not help clarify what attachment to constitutional principles requires.¹⁵ Not surprisingly, the "attachment to constitutional principles" requirement has been interpreted as requiring a belief in representative government, federalism, separation of powers, and constitutionally guaranteed individual rights. It has also been interpreted as disqualifying anarchists, polygamists, and conscientious objectors for citizenship. In 1950, support for communism was added to the list of grounds for disgualification from naturalization - as well as grounds for exclusion and deportation.¹⁶ The 1990 Immigration Act retained the McCarthy-era ideological qualifications for naturalization; current law disqualifies those who advocate or affiliate with an organization that advocates communism or opposition to all organized government.¹⁷ Patriotism, like nationalism, is capable of excess and pathology, as evidenced by loyalty oaths and campaigns against "un-American" activities.

In contrast to constitutional patriots, liberal nationalists acknowledge that states cannot be culturally neutral even if they tried. States cannot avoid coercing citizens into preserving a national culture of some kind because state institutions and laws define a political culture, which in turn shapes the range of customs and practices of daily life that constitute a national culture. David Miller, a leading theorist of liberal nationalism, defines national identity according to the following elements: a shared belief among a group of individuals that they belong together, historical continuity stretching across generations, connection to a particular territory, and a shared set of characteristics constituting a national culture.¹⁸ It is not enough to share a common identity rooted in a shared history or a shared territory; a shared national *culture* is a necessary feature of national identity. I share a national culture with someone, even if we never meet, if each of us has been initiated into the traditions and customs of a national culture.

What sort of content makes up a national culture? Miller says more about what a national culture does not entail. It need not be based on biological descent. Even if nationalist doctrines have historically been based on notions of biological descent and race, Miller emphasizes that sharing a national culture is, in principle, compatible with people belonging to a diversity of racial and ethnic groups. In addition, every member need not have been born in the homeland. Thus, "immigration need not pose problems, provided only that the immigrants come to share a common national identity, to which they may contribute their own distinctive ingredients."19

Liberal nationalists focus on the idea of culture, as opposed to ethnicity or descent, in order to reconcile nationalism with liberalism. Thicker than constitutional patriotism, liberal nationalism, Miller maintains, is thinner than ethnic models of belonging. Both nationality and ethnicity have cultural components, but what is said to distinguish "civic" nations from "ethnic" nations is that the latter are exclusionary and closed on grounds of biological descent; the former are, in principle, open to anyone willing to adopt the national culture.²⁰

Yet the civic-ethnic distinction is not so clear-cut in practice. Every nation has an "ethnic core." As Anthony Smith observes:

[M]odern "civic" nations have not in practice really transcended ethnicity or ethnic sentiments. This is a Western mirage, reality-as-wish; closer examination always reveals the ethnic core of civic nations, in practice, even in immigrant societies with their early pioneering and dominant (English and Spanish) culture in America, Australia, or Argentina, a culture that provided the myths and language of the would-be nation.²¹

This blurring of the civic-ethnic distinction is reflected throughout U.S. history with the national culture often defined in ethnic, racial, and religious terms.²²

Why, then, if all national cultures have ethnic cores, should those outside this core embrace the national culture? Miller acknowledges that national cultures have typically been formed around the ethnic group that is dominant in a particular territory and therefore bear "the hallmarks of that group: language, religion, cultural identity." Muslim identity in contemporary Britain becomes politicized when British national identity is conceived as containing "an Anglo-Saxon bias which discriminates against Muslims (and other ethnic minorities)." But he maintains that his idea of nationality can be made "democratic in so far as it insists that everyone should take part in this debate [about what constitutes the national identity] on an equal footing, and sees the formal arenas of

politics as the main (though not the only) place where the debate occurs."²³

The major difficulty here is that national cultures are not typically the product of collective deliberation in which all have the opportunity to participate. The challenge is to ensure that historically marginalized groups, as well as new groups of immigrants, have genuine opportunities to contribute "on an equal footing" to shaping the national culture. Without such opportunities, liberal nationalism collapses into conservative nationalism of the kind defended by Samuel Huntington. He calls for immigrants to assimilate into America's "Anglo-Protestant culture." Like Miller, Huntington views ideology as "a weak glue to hold together people otherwise lacking in racial, ethnic, or cultural sources of community," and he rejects race and ethnicity as constituent elements of national identity.²⁴ Instead, he calls on Americans of all races and ethnicities to "reinvigorate their core culture." Yet his "cultural" vision of America is pervaded by ethnic and religious elements: it is not only of a country "committed to the principles of the Creed," but also of "a deeply religious and primarily Christian country, encompassing several religious minorities, adhering to Anglo-Protestant values, speaking English, maintaining its European cultural heritage."²⁵ That the cultural core of the United States is the culture of its historically dominant groups is a point that Huntington unabashedly accepts.

Cultural nationalist visions of solidarity would lend support to immigration and immigrant policies that give weight to linguistic and ethnic preferences and impose special requirements on individuals from groups deemed to be outside the nation's "core culture." One example is the practice in postwar Germany of giving priority in immigration and

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naturalization policy to ethnic Germans; they were the only foreign nationals who were accepted as permanent residents set on the path toward citizenship. They were treated not as immigrants but "resettlers" (Aussiedler) who acted on their constitutional right to return to their country of origin. In contrast, non-ethnically German guestworkers (Gastarbeiter) were designated as "aliens" (Auslander) under the 1965 German Alien Law and excluded from German citizenship.²⁶ Another example is the Japanese naturalization policy that, until the late 1980s, required naturalized citizens to adopt a Japanese family name. The language requirement in contemporary naturalization policies in the West is the leading remaining example of a cultural nationalist integration policy; it reflects not only a concern with the economic and political integration of immigrants but also a nationalist concern with preserving a distinctive national culture.

Constitutional patriotism and liberal nationalism are accounts of civic solidarity that deal with what one might call first-level diversity. Individuals have different group identities and hold divergent moral and religious outlooks, yet they are expected to share the same idea of what it means to be American: either patriots committed to the same set of ideals or co-nationals sharing the relevant cultural attributes. Charles Taylor suggests an alternative approach, the idea of "deep diversity." Rather than trying to fix some minimal content as the basis of solidarity, Taylor acknowledges not only the fact of a diversity of group identities and outlooks (first-level diversity), but also the fact of a diversity of ways of belonging to the political community (second-level or deep diversity).

Taylor introduces the idea of deep diversity in the context of discussing what it means to be Canadian:

Someone of, say, Italian extraction in Toronto or Ukrainian extraction in Edmonton might indeed feel Canadian as a bearer of individual rights in a multicultural mosaic....But this person might nevertheless accept that a Québécois or a Cree or a Déné might belong in a very different way, that these persons were Canadian through being members of their national communities. Reciprocally, the Québécois, Cree, or Déné would accept the perfect legitimacy of the "mosaic" identity.

Civic solidarity or political identity is not "defined according to a concrete content," but, rather, "by the fact that everybody is attached to that identity in his or her own fashion, that everybody wants to continue that history and proposes to make that community progress."²⁷ What leads people to support second-level diversity is both the desire to be a member of the political community and the recognition of disagreement about what it means to be a member. In our world, membership in a political community provides goods we cannot do without; this, above all, may be the source of our desire for political community.

Even though Taylor contrasts Canada with the United States, accepting the myth of America as a nation of immigrants, the United States also has a need for acknowledgment of diverse modes of belonging based on the distinctive histories of different groups. Native Americans, African Americans, Irish Americans, Vietnamese Americans, and Mexican Americans: across these communities of people, we can find not only distinctive group identities, but also distinctive ways of belonging to the political community.

Deep diversity is not a recapitulation of the idea of cultural pluralism first developed in the United States by Horace Kallen, who argued for assimilation "in matters economic and political" and preservation of differences "in cultural consciousness."²⁸ In Kallen's view, hyphenated Americans lived their spiritual lives in private, on the left side of the hyphen, while being culturally anonymous on the right side of the hyphen. The ethnic-political distinction maps onto a private-public dichotomy; the two spheres are to be kept separate, such that Irish Americans, for example, are culturally Irish and politically American. In contrast, the idea of deep diversity recognizes that Irish Americans are culturally Irish American and politically Irish American. As Michael Walzer put it in his discussion of American identity almost twenty years ago, the culture of hyphenated Americans has been shaped by American culture, and their politics is significantly ethnic in style and substance.²⁹ The idea of deep or secondlevel diversity is not just about immigrant ethnics, which is the focus of both Kallen's and Walzer's analyses, but also racial minorities, who, based on their distinctive experiences of exclusion and struggles toward inclusion, have distinctive ways of belonging to America.

While attractive for its inclusiveness, the deep diversity model may be too thin a basis for civic solidarity in a democratic society. Can there be civic solidarity without citizens already sharing a set of values or a culture in the first place? In writing elsewhere about how different groups within democracy might "share identity space," Taylor himself suggests that the "basic principles of republican constitutions – democracy itself and human rights, among them" constitute a "non-negotiable" minimum. Yet, what distinguishes Taylor's deep diversity model of solidarity from Habermas's constitutional patriotism is the recognition that "historic identities cannot be just abstracted from." The minimal commonality of shared principles is "accompanied by a recognition that these principles can be realized in a number of different ways, and can never be applied neutrally without some confronting of the substantive religious ethnic-cultural differences in societies."30 And in contrast to liberal nationalism, deep diversity does not aim at specifying a common national culture that must be shared by all. What matters is not so much the content of solidarity, but the ethos generated by making the effort at mutual understanding and respect.

Canada's approach to the integration of immigrants may be the closest thing there is to "deep diversity." Canadian naturalization policy is not so different from that of the United States: a short required residency period, relatively low application fees, a test of history and civics knowledge, and a language exam.³¹ Where the United States and Canada diverge is in their public commitment to diversity. Through its official multiculturalism policies, Canada expresses a commitment to the value of diversity among immigrant communities through funding for ethnic associations and supporting heritage language schools.32 Constitutional patriots and liberal nationalists say that immigrant integration should be a two-way process, that immigrants should shape the host society's dominant culture just as they are shaped by it. Multicultural accommodations actually provide the conditions under which immigrant integration might genuinely become a two-way process. Such policies send a strong message that immigrants are a welcome part of the political community and should

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play an active role in shaping its future evolution.

The question of solidarity may not be the most urgent task Americans face today; war and economic crisis loom larger. But the question of solidarity remains important in the face of ongoing large-scale immigration and its effects on intergroup relations, which in turn affect our ability to deal with issues of economic inequality and democracy. I hope to have shown that patriotism is not easily separated from nationalism, that nationalism needs to be evaluated in light of shared principles, and that respect for deep diversity presupposes a commitment to some shared values. including perhaps diversity itself. Rather than viewing the three models of civic solidarity I have discussed as mutually exclusive – as the proponents of each sometimes seem to suggest - we should think about how they might be made to work together with each model tempering the excesses of the others.

What is now formally required of immigrants seeking to become American citizens most clearly reflects the first two models of solidarity: professed allegiance to the principles of the Constitution (constitutional patriotism) and adoption of a shared culture by demonstrating the ability to read, write, and speak English (liberal nationalism). The revised citizenship test makes gestures toward respect for first-level diversity and inclusion of historically marginalized groups with questions such as, "Who lived in America before the Europeans arrived?" "What group of people was taken to America and sold as slaves?" "What did Susan B. Anthony do?" "What did Martin Luther King, Jr. do?" The election of the first African American president of the United States is a significant step forward. A more inclusive American solidarity requires the recognition not only of the fact that Americans are a diverse people, but also that they have distinctive ways of belonging to America.

ENDNOTES

- ¹ For comments on earlier versions of this essay, I am grateful to participants in the Kadish Center Workshop on Law, Philosophy, and Political Theory at Berkeley Law School; the Penn Program on Democracy, Citizenship, and Constitutionalism; and the UCLA Legal Theory Workshop. I am especially grateful to Christopher Kutz, Sarah Paoletti, Eric Rakowski, Samuel Scheffler, Seana Shiffrin, and Rogers Smith.
- ² Philip Gleason, "American Identity and Americanization," in *Harvard Encyclopedia of American Ethnic Groups*, ed. Stephan Thernstrom (Cambridge, Mass.: Belknap Press, 1980), 31 32, 56 57.
- ³ David Hollinger, "From Identity to Solidarity," *Dædalus* 135 (4) (Fall 2006): 24.
- ⁴ David Miller, "Multiculturalism and the Welfare State: Theoretical Reflections," in *Multiculturalism and the Welfare State: Recognition and Redistribution in Contemporary Democracies*, ed. Keith Banting and Will Kymlicka (Oxford: Oxford University Press, 2006), 328, 334.
- ⁵ Charles Taylor, "Why Democracy Needs Patriotism," in *For Love of Country*? ed. Joshua Cohen (Boston : Beacon Press, 1996), 121.
- ⁶ On the purpose and varieties of narratives of collective identity and membership that have been and should be articulated not only for subnational and transnational, but also

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for national communities, see Rogers M. Smith, *Stories of Peoplehood : The Politics and Morals of Political Membership* (Cambridge : Cambridge University Press, 2003).

⁷ Jürgen Habermas, "Citizenship and National Identity," in *Between Facts and Norms : Contributions to a Discourse Theory of Law and Democracy,* trans. William Rehg (Cambridge, Mass. : MIT Press, 1996), 500.

⁸ Ibid.

- ⁹ Edward Rothstein, "Connections: Refining the Tests That Confer Citizenship," *The New York Times,* January 23, 2006.
- ¹⁰ See http://www.uscis.gov/files/nativedocuments/100q.pdf (accessed November 28, 2008).
- ¹¹ Habermas, "The European Nation-State," in *Between Facts and Norms*, trans. Rehg, 118.
- ¹² Charles Taylor, "The Politics of Recognition," in *Multiculturalism : Examining the Politics of Recognition*, ed. Amy Gutmann (Princeton : Princeton University Press, 1994); Will Kymlicka, *Multicultural Citizenship : A Liberal Theory of Minority Rights* (Oxford : Oxford University Press, 1995).
- ¹³ 8 U.S.C., section 1423 (1988); *In re Katz*, 21 F.2d 867 (E.D. Mich. 1927) (attachment to principles of Constitution implies English literacy requirement).
- ¹⁴ Act of Mar. 26, 1790, ch. 3, 1 Stat., 103 and Act of Jan. 29, 1795, ch. 20, section 1, 1 Stat., 414. See James H. Kettner, *The Development of American Citizenship*, 1608 1870 (Chapel Hill: University of North Carolina Press, 1984), 239 243. James Madison opposed the second requirement: "It was hard to make a man swear that he preferred the Constitution of the United States, or to give any general opinion, because he may, in his own private judgment, think Monarchy or Aristocracy better, and yet be honestly determined to support his Government as he finds it"; Annals of Cong. 1, 1022 1023.
- ¹⁵ 8 U.S.C., section 1427(a)(3). See also *Schneiderman v. United States*, 320 U.S. 118, 133 n.12 (1943), which notes the change from *behaving* as a person attached to constitutional principles to *being* a person attached to constitutional principles.
- ¹⁶ Internal Security Act of 1950, ch. 1024, sections 22, 25, 64 Stat. 987, 1006 1010, 1013 1015. The Internal Security Act provisions were included in the Immigration and Nationality Act of 1952, ch. 477, sections 212(a)(28), 241(a)(6), 313, 66 Stat. 163, 184 – 186, 205 – 206, 240 – 241.
- ¹⁷ Gerald L. Neuman, "Justifying U.S. Naturalization Policies," Virginia Journal of International Law 35 (1994): 255.
- ¹⁸ David Miller, On Nationality (Oxford: Oxford University Press, 1995), 25.

- ²⁰ On the civic-ethnic distinction, see W. Rogers Brubaker, *Citizenship and Nationhood in France and Germany* (Cambridge, Mass.: Harvard University Press, 1992); David Hollinger, *Post-Ethnic America : Beyond Multiculturalism* (New York : Basic Books, 1995); Michael Ignatieff, *Blood and Belonging : Journeys into the New Nationalism* (New York : Farrar, Straus, and Giroux, 1995); Yael Tamir, *Liberal Nationalism* (Princeton : Princeton University Press, 1993).
- ²¹ Anthony D. Smith, *The Ethnic Origins of Nations* (Oxford: Blackwell, 1986), 216.
- ²² See Rogers M. Smith, *Civic Ideals : Conflicting Visions of Citizenship in U.S. History* (New Haven : Yale University Press, 1997).
- ²³ Miller, On Nationality, 122 123, 153 154.
- ²⁴ Samuel P. Huntington, *Who Are We? The Challenges to America's National Identity* (New York: Simon & Schuster, 2004), 12. In his earlier book, *American Politics: The Promise of*

¹⁹ Ibid., 25 – 26.

Disharmony (Cambridge, Mass.: Belknap Press, 1981), Huntington defended a "civic" view of American identity based on the "political ideas of the American creed," which include liberty, equality, democracy, individualism, and private property (46). His change in view seems to have been motivated in part by his belief that principles and ideology are too weak to unite a political community, and also by his fears about immigrants maintaining transnational identities and loyalties – in particular, Mexican immigrants whom he sees as creating bilingual, bicultural, and potentially separatist regions; *Who Are We*? 205.

- ²⁵ Huntington, Who Are We? 31, 20.
- ²⁶ Christian Joppke, "The Evolution of Alien Rights in the United States, Germany, and the European Union," *Citizenship Today : Global Perspectives and Practices*, ed. T. Alexander Aleinikoff and Douglas Klusmeyer (Washington, D.C. : Carnegie Endowment for International Peace, 2001), 44. In 2000, the German government moved from a strictly *jus sanguinis* rule toward one that combines *jus sanguinis* and *jus soli*, which opens up access to citizenship to non-ethnically German migrants, including Turkish migrant workers and their descendants. A minimum length of residency of eight (down from ten) years is also required, and dual citizenship is not formally recognized. While more inclusive than before, German citizenship laws remain the least inclusive among Western European and North American countries, with inclusiveness measured by the following criteria : whether citizenship is granted by *jus soli* (whether children of non-citizens who are born in a country's territory can acquire citizenship), the length of residency required for naturalization, and whether naturalized immigrants are permitted to hold dual citizenship. See Marc Morjé Howard, "Comparative Citizenship : An Agenda for Cross-National Research," *Perspectives on Politics* 4 (2006): 443 455.
- ²⁷ Charles Taylor, "Shared and Divergent Values," in *Reconciling the Solitudes : Essays on Canadian Federalism and Nationalism*, ed. Guy Laforest (Montreal and Kingston : McGill-Queen's University Press, 1993), 183, 130.
- ²⁸ Horace M. Kallen, Culture and Democracy in the United States (New York: Boni & Liveright, 1924), 114–115.
- ²⁹ Michael Walzer, "What Does It Mean to Be an 'American'?" (1974); reprinted in What It Means to Be an American: Essays on the American Experience (New York: Marsilio, 1990), 46.
- ³⁰ Charles Taylor, "Democratic Exclusion (and Its Remedies?)," in *Multiculturalism, Liberalism, and Democracy*, ed. Rajeev Bhargava et al. (Oxford: Oxford University Press, 2000), 163.
- ³¹ The differences in naturalization policy are a slightly longer residency requirement in the United States (five years in contrast to Canada's three) and Canada's official acceptance of dual citizenship.
- ³² See Irene Bloemraad, Becoming a Citizen: Incorporating Immigrants and Refugees in the United States and Canada (Berkeley: University of California Press, 2006).

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