

## POSTMODERN DISCOURSE ANALYSIS OF CITIZENSHIP TESTS: THE CASES OF THE UNITED STATES OF AMERICA AND THE UNITED KINGDOM\*

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### *Abstract*

*Citizenship tests are used by states as a tool of naturalization and migration policies. In this paper, a brief discourse analysis of citizenship tests which can be called as an “entrance gate of naturalization” of two most immigrant-receiving countries in the world with their development level and other reasons, the United States and the United Kingdom, are examined. Accordingly, the discourse of the questions those countries ask in the tests and the features they regard as significant to put forward are focused on. Although some examples are given from some European countries when necessary, the main emphasis is given to the case countries. The main reason why these countries are selected is that they are both English as native language and have long term experience in such tests. In the analyses and comparisons, links with the discussions in the literature and on the political grounds will also take part.*

**Keywords:** *Citizen, Citizenship, Citizenship Tests, Immigrant, The United States of America, The United Kingdom, Naturalization.*

## VATANDAŞLIK SINAVLARININ POSTMODERN SÖYLEM ANALİZİ: AMERİKA BİRLEŞİK DEVLETLERİ VE BİRLEŞİK KRALLIK ÖRNEKLERİ

### *Öz*

*Vatandaşlık sınavları devletler tarafından göç ve vatandaşlığa kabul politikalarının bir aracı olarak kullanılmaktadır. Bu çalışmada gelişmişlik*

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\* This study is a reduced version of the thesis defended with the same title at Istanbul University, Institute of Social Sciences, Political Science and International Relations MA Programme, on December 2015. Earlier version of this article was first presented at the University of Twente, Institute for Innovation and Governance Studies, Departmental Research Meetings on 9 June 2015.

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*düzeyleri ile göçmen ve vatandaşlık taleplerinin yoğunluğu dolayısıyla dünyada en çok göç alan ülkelerden olan Amerika Birleşik Devletleri ve Birleşik Krallık'ın 'vatandaşlık kabulünün giriş kapısı' olarak görülen vatandaşlık sınavlarının uluslararası perspektifte değişimini dikkate alan söylemsel bir analizi yapılacaktır. Ülkelerin bu sınavlarda sorduğu sorularda kullandıkları dil ve öne çıkarmakta önemli gördükleri özellikler kategorilere ayrılarak incelenecektir. Avrupa ülkelerinden yeri geldikçe kesişen kimi noktalarda örnekler verilmekle beraber, esas ağırlıklı inceleme Amerika Birleşik Devletleri ve Birleşik Krallık'a verilecektir. Yapılan analizlerde ve kıyaslamalarda literatürde ve politik zeminde cereyan eden tartışmalarla kurulan ilişkilere de yer verilecektir.*

**Anahtar Kelimeler:** *Vatandaş, Vatandaşlık, Vatandaşlık Sınavları, Göçmen, Amerika Birleşik Devletleri, Birleşik Krallık, Vatandaşlığa Kabul.*

## **Introduction**

Despite the number of articles which contextualize citizenship tests and naturalization policies of many European countries, North America and Australia; there does not exist a mere analysis of the comparison of the US and the UK citizenship tests. Therefore, the aim of this article is to provide a vision of comparison of both tests. The main concern will be on a value based comparison on the basis of test questions types. Firstly, an overall view about the term "citizenship" and "citizenship tests" will be given, and followingly the US and the UK examples will be analyzed with the help of exam questions. Finally both exam questions and featured discourses will be compared and discussed in the conclusion.

Citizenship tests might appear as the tools of obtaining citizenship in a modern state wherever the migration reasons come from. These reasons may vary up to country types and socio-economic factors, however, the term "citizen" and the "citizenship" can be discussed on two bases: law based approach, and the political integration approach as the concern of the international relations and political science. In this paper, second definition of citizenship is addressed. The method used in the article is a combination of discourse and to some extent genealogy analyses which are instrumental methods of the Postmodernism and Critical theories.

## **Theoretical Background and Literature Review**

Citizenship tests have been being analyzed mainly on the basis of whether they are liberal or neoliberal. In this paper it will be addressed to what extent

they hold values and national traditions in post modern era. This value based research will help us compare how and which national ties shape and take part in the citizenship procedures since Post modernism and Critical theory address knowledge-power relations. Cox (1987: 7) states that “knowledge is always constituted for someone and for some purpose” and this can be a reflection of states’ knowledge creation mechanism. For this reason, analysing citizenship tests’ questions will be associated with post modern approaches in this research.

There have been drastic changes in the definition of citizenship since Aristotle’s definition as follows: citizens as a community which is an active, moral and political being, however it was accessible only to a small group of males (Barker, 1995: 510). Taking into consideration that the origin of the term “citizen” comes from “city” in English, “*civitas*” in Latin, citizen had a meaning of people who share a “city” rather than a “country”.

Starting from a privileged status which brings along an “allegiance to a city”, perception of citizenship has been changed gradually in the nation-state. Instead of being a citizen of a certain city, it broadened out into a country which has drawn borders and are distributing the same rights equally to each member (citizen). In the age of a modern nation state, Brubaker defined citizenship as "a model of membership" which divides it into six categories. Within this model, being a member of the nation state has been based on qualities such as: egalitarian, sacred, nation-membership, democratic, unique, and socially consequential (Brubaker, 1990: 380). Having the main principles, however, this model remains incapable in today’s post modern state. That is to say, in his own words, “this model of membership is largely vestigial... then, is the ideological backdrop against which the contemporary politics of citizenship and social membership is played out” (Brubaker, 1990: 381). The changes in global conditions such as the end of the Cold War, the fall of the Berlin Wall paved the way for a drastic transformation in the definition of the citizenship in the post modern era. Increase in migration movements at a global level led to such changes in citizen-state relations while classical definitions are considered.

Citizenship, in the definition of the modern nation state, means “a legal tie between the individual, who performs a legal status, and the state which determines terms and conditions by using unilateral sovereignty rights” (Dağ, 2004: 86). This definition reflects a juridical explanation, therefore it should be discussed in the social construction of the citizenship that Turner defines as follows: “citizenship as a set of practices (juridical, political, economic and cultural) which defines a person as a competent member of society, and which as a consequence shape the flow of resources to persons and social groups”

(Turner, 1993: 2). Hereby, the key word which comes into the picture is “practice”. It consists more of applications rather than solely rights and obligations. These bunch of practices appear in political and social life as it can be considered as a higher arena (political grounds) than the private one.

Taking into consideration these rights and responsibilities, the emerging question is how and to what extent the citizens comply with the law they are entitled to. As an example to this concern, former Prime Minister of the United Kingdom David Cameron’s immigration speech can be shown: “What matters most is not who comes into the country but who stays” (The Guardian, 2011). This speech which reflects an attitude against immigration will be analysed deeper in the section of the UK.

Generally, these changes in definitions caused further changes in states’ citizenship tests. Citizenship tests, beyond its connotation of examining prospective citizens whether they are qualified in order to obtain citizenship, are invented as a result of need. Clarifying the fact that the main subjects/agents of the citizenship tests are the “state” and the “prospective citizen”, will help us easily analyze the background of the tests. It is not surprising that the status of the hereby mentioned prospective citizen is “immigrant”.

Previous researches on citizenship are mainly based on Rawlsian “political liberal citizenship” context (Rawls, 1985, 1993). Rawls is mostly addressed when the debate is being discussed referring to American liberal sense. In addition to Rawls, Christian Joppke developed immigration-citizenship relation in liberal states improving the term “civic integration” (Joppke, 2007: 41, 2010: 1). Joppke assesses the US as the “heartland of liberalism” while comparing Europe and American practices. Again, in the liberal concept, the topic has been discussed as “to what extent citizenship tests are liberal” by Christian Joppke and Rainer Bauböck (2010). Their general finding was that liberal policies are the main source which shape citizenship discourses.

In comparison of those studies to Europe, Yasemin Nuhoglu Soysal discussed integration processes and how citizenship has taken place in the political discourse of Europe, in her work *Limits of Citizenship: Migrants and Postcolonial Membership in Europe* (1994). However, the composition of migration to Europe has showed some changes since then.

On the purpose of analyzing test questions, Ines Michalowski (2009: 1-26) has investigated the political liberalism expressions in the citizenship tests of five case countries which are The United Kingdom, The United States of America, Germany, Austria and The Netherlands, and made classifications on

the basis of question types. In my study, I have been impressed by her research and took her classification method (See Appendix 1) in order to analyze question types of the tests (*Life in the UK* and *Naturalization*).

As a comparative analysis, Mireille Pacquet discussed differences between the citizenship tests of Canada and the UK in her article *Beyond Appearances: Citizenship Tests in Canada and the UK* (2012). As criticizing tests, Julian Wohnung Park discussed the US Naturalization Test on the basis of meeting the criteria of "principle based ideology" (Park, 2008: 1002). He analyzed the new test which was implemented in 2007. A wider analysis of the US Naturalization Test has been made by Orgad (2011) in the article of *Creating New Americans: The Essence of Americanism under the Citizenship Test*.

Moreover, Joseph Turner discussed *Life in the UK* Test in terms of liberal context in his article '*Testing the liberal subject: (in)security, responsibility and 'self-improvement' in the UK citizenship test*' (2014). He analyzed the content of the test and struggles while transforming from an immigrant into citizen. Another analysis of *Life in the UK* test has been made by Patricia White (2008) as she compared 2004 and 2007 tests. Her main emphasis was on outstanding differences between two tests and her finding in the analysis was that there was a pervasive and subtle difference between 2004 and 2007 tests in terms of governing body denotations and chapter titles.

### **Data Collection and Method of Analysis**

The data used in this research has been collected from naturalization process handbooks of the US and the UK as the case countries of this study. In the US case, a branch of the Department of Homeland Security, which is called Citizenship and Immigration Services (USCIS) prepares these tests and makes most of the implementations. On the other hand, in the UK, *Life in the UK* Test is implemented by Home Office and UK Border Agency, however it is managed by Ufi Limited which is a non-profit organization for online testing. The data has also been collected from the official handbook *Life in the United Kingdom: A Guide for New Residents* (3rd Edition) published by Home Office (2013) and as well as sample questions.

While analyzing the citizenship test questions, it would be helpful to proceed with Michalowski's classification which is composed of four main thematic categories and fourteen sub thematic categories. These four main thematic categories are; "politics, history and geography", "economy, public service and its financing", "traditions and public moral" and "other", and connected to them, sub thematic category titles include: "lifestyles", "work and

self-employment”, “administrations and formalities”, “health”, “education”, “political system, democracy and rights”, and “history, geography, national symbols” (Michalowski, 2009: 5-6). While this method will be used in analyzing *Life in the UK Test*, it will not be applied to the US *Naturalization* test as its own classification is more useful to categorize question types.

### **General Overview of Citizenship Tests**

Citizenship tests are mainly used as tools to control the level and the composition of immigration rather than establishing qualifications (Etzioni, 2007: 353). According to Etzioni this inference has been made by the information that the test takers are either immigrants or their relatives/children and the implications in the exams are made according to the migration tendencies throughout history. Although legal regulations can change from state to state, it is mainly common that the general tendency is based on reasons explained above.

On the other hand, it should be considered that there exist other practices to obtain citizenship besides citizenship tests. First of them, is the principle of *jus soli*, which can be translated as birth on territory from Latin to English and means obtaining citizenship solely by being born in that country (Lister, 2010, Benhabib, 2013: 504). As the United States has this regulation, many European countries have abolished this practice. Another way of obtaining citizenship is called the principle of *jus sanguinis*, which means “birth to citizen parents/descendent ties”, and it leads up to citizenship through consanguinity (Benhabib, 2013: 500). While obtaining citizenship via these two practices can be called as “natural” (natural citizen), obtaining citizenship via citizenship tests is called “naturalized”. For these reasons, the United States named its citizenship test as *Naturalization Test*. Whereas the legal usage of the word naturalization is “obtaining citizenship”, Oxford English Dictionary defines the word as “to make native” (Fortier, 2013: 698). From this point forth, “getting made native” entitles new citizens with the same rights and duties as native-born citizens. Moreover, Meriam Webster Dictionary describes the term as “failing that, naturalisation offers the possibility to acquire an ‘as if’ status to become established as if native”.

#### *Political and Social Framework of the Citizenship Tests*

Citizenship test questions of the selected countries will be analyzed through tables below and changes in question types over years. While analyzing the test questions, it is quite expected to track national/historical codes of the countries via questions (as it is hidden inherently). Besides, even if policies of the states

may differ from one to another, the common terminology used to define “new comers/prospective citizens” is highly similar (Gourgouris, 1996: 84).

These prospective citizens achieve the final outcome as long as they pass the steps and fulfill the criteria which states decided beforehand. Within this framework, it is possible to create an image of a linear relation of the expectations of state, prospective citizen, and the achieved goal.

Identifying today’s post modern states’ citizen-state relations, the classical definitions referring to focus on the nation-state seem to remain weak. Therefore, a new frame through citizenship tests requires a transformed version of this relationship. These bonds are different than the belonging codes of classical times, so that new “bond adapters” are needed. What will replace this bond in the citizenship transformation is controversially discussed. The fact remains that to what extent those new-citizens would embrace the values and the history of that state. Amitai Etzioni (2011) gives an example concerning this issue as follows:

“For example, as an immigrant to America I cannot claim that I had nothing to do with slavery, and yet also claim that I am entitled to the rights that the Founding Fathers institutionalized. Similarly, a new German cannot pride himself on the achievements of Kant, Goethe and Bach without also sharing responsibility for the Holocaust.” (Etzioni, 2011: 341)

Appropriation or exclusion (denying) of these values are based on choices in this new relationship model as citizenship itself is a matter of choice. Whereas states request their expectations from prospective citizens on the basis of “knowledge” in the citizenship exam, after obtaining citizenship, it sorts the rights and responsibilities that those new citizens will be entitled to.

On the other hand, on the basis of immigration-acceptance relationship, it emerges as a tool of states to control composition of immigration. As Etzioni defines, citizenship tests have been used to serve primarily as immigration control measures rather than as significant tools for preparation for citizenship (Etzioni, 2007: 356). Herein, citizenship tests act as an important tool for most immigrant-receiving countries and the countries which need to limit immigration demands.

Citizenship tests can be classified under four types as examined in Etzioni’s (2007: 358-360) work: “libertarian approach” to citizenship in its purest form, “contemporary liberal precept”, “neo-communitarian concept”, and “authoritarian communitarian concept”. First, the classical libertarian approach

views citizenship as a status in minimal state and accordingly limits what citizens' duties entail and the extent to which they are expected to participate in the state (Etzioni, 2007: 358). These type of tests require relatively less preparation.

Contemporary liberal precept focuses the questions on whether people are aware of their rights or not. Liberal citizenship can be defined as in Marshall's words: "a set of rights enjoyed equally by every member of the society in question" (Marshall, 1950: 29). This approach is also related to Rawls' argument that "citizens of a liberal state are political entities whose essential nature is most fully realized in a democratic society in which there is widespread and vigorous participation in political life" (Rawls, 1993: 206).

On the other hand, neo-communitarian concept puts forward citizens as both right bearing individuals and as persons who must assume responsibilities toward each other and toward the community at large. Neo-communitarians draw a distinction between state and society, and view the nation as a community invested in a state (Etzioni, 2007: 359). Citizenship tests of this concept include normative commitments more than merely knowledge. Rather than knowledge, they test prospective citizens' readiness to adopt responsibilities. Besides, preparation for this kind of tests includes some impact on acculturation without assimilating as fostering eradication. For instance;

"...generation after generation of immigrants who were first viewed as undermining the American society and its core of shared values have become an integral part of it, including Jewish immigrants and immigrants from Catholic countries (especially Ireland and Poland), without giving up their subcultures and ethnic identities" (Etzioni, 2007: 359).

Lastly, authoritarian communitarians see citizenship as an irreplaceable cell within the organic body. They believe that it has to be a key feature to maintain social harmony so individual rights and political liberties must be curtailed. Some of them put more emphasis on leaders and champions (Singapore and Malaysia) and heavy moral cultural values (Japan) to maintain state's function. In addition, authoritarian communitarians put forward that west's notion of liberty means "anarchy" in itself and, using the idea of having legal and political rights to chastise other cultures which have different values in their own culture (Etzioni, 2007: 359). Such states imply to control immigration with stronger methods than citizenship tests. As an example, Singapore had a rule of prohibiting their female immigrants from neighbouring countries to marry

without prior official permission and required women to be tested for pregnancy every six months to make it difficult to obtain citizenship by becoming a spouse or a parent of a citizen (Library of Congress Country Studies, 2006).

Another approach to citizenship tests was categorized by Löwenheim and Gazit (2009: 151) from a Foucauldian Postmodern perspective. They see citizenship tests as a) a sign of authority, b) a technology used to naturalize authority, and c) a disciplinary tool. *As a sign of authority*, the examination establishes a hierarchy between the examiner and the examinee, and examiners possess the legitimate right to classify and pass judgment. *As a technology to naturalize authority*, the exam system aims to construct authority as a given, indisputable fact and is characterized by two aspects: formalization of individuals within power relations and transparency which is created via the elements of objectification, standardization and accuracy. Hence the examination imposes a compulsory visibility on the examinee. Finally, *disciplinary tool* sees exams as “a normalizing gaze, a surveillance that makes it possible to qualify, to classify, and to punish” (Foucault, 1977 as cited in Löwenheim and Gazit, 2009: 151).

### **The Case of the United States of America: *Naturalization* Test**

The United States of America has a longstanding migration history. Even after the Cold War, the US has kept its place as being the most immigrant receiving country according to United Nations 1990-2013 Population Facts data. Due to high number of naturalization applicants, the US government implies naturalization process with the citizenship test called *Naturalization*. The test has two parts, while the first part tests candidate’s knowledge of English in the written test, the second part is about civics questions which is held as an oral exam. My main emphasis will be on the second part and the outstanding subjects in the questions. While up to 10 questions are asked in the oral test and 6 correct answers are required to pass the test, the written part consists of reading, writing and speaking. The criteria that applicants need to meet before taking the test is sorted as follows: Time in USCIS district or state, Good moral character, English and Civics knowledge, Attachment to the Constitution (For further details in requirement explanations, please see Appendix 2). The application fee is set as 725 American Dollars (including biometric fee) which is a quite high amount compared to the *Life in the UK* Test.

USCIS (US Citizenship and Immigration Services “Civics Questions for the Naturalization Test”, January 2017) sorts 100 sample questions by dividing

them into three main categories such as: American government, American history, and Integrated Civics. These three main titles are also divided into three subtitles in themselves. Under the section of American government, subtitles of Principles of American Democracy, System of Government, Rights and Responsibilities ranges. American history section's subtitles are Colonial Period and Independence, 1800s, Recent American History and Other Important Historical Information. Lastly, final section's subtitles are sorted as follows, Geography, Symbols, Holidays. Applicants are asked up to ten questions among those sections above. This classification and titles help us analyze which part of the history is held with regard to the national discourse of the US.

Sample questions under the first subtitle "Principles of American Democracy" are sorted as follows: Q1: "What is the supreme law of the land?", Q2: "The idea of self-government is in the first three words of the Constitution. What are these words?", Q3: "What did the Declaration of Independence do?", Q4: "What is the economic system in the United States?", Q5: "How many amendments does the Constitution have?", Q6: "What do we call the first ten amendments to the Constitution?", Q7: "What is freedom of religion?". As it can be seen from the sample questions, although the title is democracy, the word "democracy" does not take place in any question. Main emphasis is on hardcore principles of the government, and as a single point liberal values appears in the question of "freedom of religion". The discourse can be related to the heartland of liberalism label to the US.

System of Government subtitle consists of questions as follows: Q8: "Who makes federal laws?", Q9: "Name one branch or part of the government", Q10: "What stops one branch of government from becoming too powerful?", Q11: "Who makes federal laws?", Q11: "We elect a U.S. Senator for how many years?", Q12: "Who is the Commander in Chief of the military?", Q13: "Who is one of your state's U.S. Senators now?", Q14: "We elect a President for how many years?". This section has more questions in numbers than the Principles of American Democracy section (35 sample questions). It is given emphasis on executive, legislative and judicial powers. Discourse of the questions is basically structured as a simplified language of those powers. It is expected from the prospective citizens to have knowledge about the organization of the government and even in some parts, it requires detailed knowledge.

In the section of Rights and Responsibilities, questions are sorted as follows, Q15: "There are four amendments to the Constitution about who can vote. Describe one of them." The probable answers of this question are also

listed. While “A male citizen of any race (can vote)” can show the traces of history of racism against African-American people, “You don’t have to pay (a poll tax) to vote” answer emphasizes economy-politics relations behind voting. Q16: “What is one responsibility that is only for United States citizens?”, Q17: “Name one right only for United States citizens”, Q18: “What do we show loyalty to when we say the Pledge of Allegiance?”, Q19: “What is one promise you make when you become a United States citizen?” The answers of the last question such as “give up loyalty to other countries”, “defend the Constitution and laws of the United States”, “be loyal to the United States” show also traces of high patriotism as it does not take that much place when compared to *Life in the UK* test.

American history as the second main category starts with Colonial Period and Independence subtitle. Questions are sorted as follows, Q20: “What is one reason colonists came to America?”, answers for this question are “freedom”, “religious freedom”, “economic opportunity”, “practice their religion”, “political liberty”, “escape persecution” show a tendency of emphasis on the US as a land of religious liberties and economic prosperity. Q21: “Who lived in America before the Europeans arrived?”, Q22: “What group of people was taken to America and sold as slaves?”, Q23: “Why did the colonists fight the British?” refer to colonial background and answers to Q23 are “because of high taxes (taxation without representation)”, “because the British army stayed in their houses (boarding, quartering)”, “because they didn’t have self-government” show a detailed knowledge expected from the applicant to know. Q24: “Who wrote the Declaration of Independence?”, Q25: “There were 13 original states. Name three.”, Q26: “What happened at the Constitutional Convention?”, Q27: “What is one thing Benjamin Franklin is famous for?”, Q28: “Who is the “Father of Our Country”?” point out the important figures in American history. Particularly, “father of our country”, is a phrase which is frequently referred to.

1800s subtitle starts with Q29: “What territory did the United States buy from France in 1803?”, Q30: “Name one war fought by the United States in the 1800s”, Q31: “Name the U.S. war between the North and the South.”, Q32: “Name one problem that led to the Civil War”, Q33: “What was one important thing that Abraham Lincoln did?”. As it can easily be seen clearly the discourse is mainly on war history when it comes to 1800s.

Last subtitle “Recent American History and Other Important Historical Information” also continues this war discourse. Questions are such as Q34: “Name one war fought by the United States in the 1900s.”, Q35: “Who was

President during World War I?”, Q36: “Who was President during the Great Depression and World War II?”, Q37: “Who did the United States fight in World War II?”, Q38: “Before he was President, Eisenhower was a general. What war was he in?” can be given as examples to this discourse. As this subtitle is recent history, it includes questions from the 20. and 21.centuries. Q39: “During the Cold War, what was the main concern of the United States?” has only one answer given, which is “communism”. Emphasis is also given to civil rights movement in the questions such as: Q40: “What movement tried to end racial discrimination?” and Q41: “What did Martin Luther King, Jr. do?”. Terror and threat discourse can be seen in Q42: “What major event happened on September 11, 2001, in the United States?” and only one answer is given as “Terrorists attacked the United States.”

In the final main category titled “Integrated civics”, the questions are miscellaneously divided into three subtitles: geography, symbols, and holidays. Q43: “Name one of the two longest rivers in the United States.”, Q44: “What ocean is on the West Coast of the United States?”, Q45: “. Name one U.S. territory.” (answers are; Puerto Rico, U.S. Virgin Islands, American Samoa, Northern Mariana Islands, Guam), Q46: “ Where is the Statue of Liberty?”, Q47: “Name one state that borders Canada”. These questions show that the basic knowledge in geography is tested. This trend is also valid in symbols and holidays subtitles as can be seen in Q48: “Why does the flag have 50 stars?” and Q49: “What is the name of the national anthem?”, and in the holidays part Q:50 “When do we celebrate Independence Day?”, Q51: “Name two national U.S. holidays.” as they are one of the national codes.

Overall, Julian W. Park finds the Naturalization test “principle based”: “A principle-based citizenship is ultimately an exclusionary ideology that forecloses certain disfavored groups, such as immigrants and nonwhites, from full membership into the citizenship community” (Park, 2008). While being agreed with this point of view, in addition to these principles, strong patriotic ties and hidden threat discourse can be seen in the ideology behind the test.

### **The United Kingdom Case: *Life In The UK Test***

Life in the UK test is a citizenship test which is applied to immigrants between ages 18-65 who seek to obtain citizenship and it has a cost of 50 Sterling. It is required to receive at least a grade of 75% to pass the test and in case of failure, the test can be retaken in seven days by paying the same fee without having any restrictions for the number of test taking. The United Kingdom sorts the criteria to be able to take the test as follows: being 18 or over,

“be of a good character” eg. not having a serious or recent criminal record, claiming to continue to live in the UK, meeting the knowledge of English requirements, and meeting the residency requirements.

The test has been taken into consideration in 2002 with the Nationality, Immigration and Asylum Act. Hereby mentioned act regulated rudiments for immigration and asylum. According to these rules, *Life in the UK* Test was launched in November 2005. The content has been changed few times since the beginning, however it is still criticized as Brooks (2012: 563) states “It is more than a barrier that excludes, but a bridge to new citizens who may become full equal members”. After the changes in 2007, it has been decided to give more emphasis to the historical success of the UK (Brooks, 2012: 560). Although *Life In The United Kingdom: A Guide For New Residents* handbook classifies the test questions into five categories, in this paper Michalowski’s classification will be taken into consideration as it explains question types more in detail. The categories of *Life In The United Kingdom: A Guide For New Residents* are: Values and Principles of the UK (1:*The values and principles of the UK*, 2:*Becoming a permanent resident*, 3:*Taking the Life in the UK test*), What is the UK?, A long and illustrious history (1:*Early Britain*, 2:*The Middle Ages*, 3:*The Tudors and Stuarts*, 4:*A global power*, 5:*The 20th century*, 6:*Britain since 1945*), Modern and thriving society (1:*The UK today*, 2:*Religion*, 3:*Customs and traditions*, 4:*Sport*, 5:*Arts and culture*, 6:*Leisure*, 7:*Places of interest*), The UK government, the law and your role (1:*The development of British democracy*, 2:*The British constitution*, 3:*The government*, 4:*The UK and international institutions*, 5:*Respecting the law*, 6:*Fundamental principles*, 7:*Your role in the community*). In addition, in terms of a discourse of the test from the beginning, the term “resident” is used instead of “citizen” in the British test. It suggests that either the UK government prefers to call their prospective citizens as new residents or because the test is also taken by people who apply for “indefinite leave to remain” in the UK.

In the first category of Politics, History and Geography, questions which can be classified under the “political system, democracy, rights” subtitle are, Q1: “The King or Queen does not rule the country but appoints the government chosen by the people in a democratic election (True-False)”, Q2: “MPs are elected in a General Election held at least every \_\_\_ year(s)”, Q3: “Who does make a speech which summarises the government’s policies for the year ahead?”, Q4: “The House of Lords is more powerful than The House of Commons (True-False)”, Q5: “The Speaker of the House of Commons is chosen by whom?” These five sample questions can be analyzed slightly

different than Rawlsian liberal analysis as they are a reflection of a state's main features. It is expected from prospective citizens that they should know and after adapt the structure of law and politics which they soon will be entitled to.

"History, geography, national symbols" subtitle includes more questions than the first subtitle "political system, democracy and rights". These questions can be sorted such as: Q6: "In the mid-19th century, the Chartists campaigned for democratic reforms including: (Choose any three answers)", Q7: "When was the Hadrian Wall built?", Q8: "In the mid-17th century, the Civil War between Charles I and Parliament led to Oliver Cromwell becoming king of England (True-False)", Q9: "In 1801, a new version of the official flag of the United Kingdom was created. What is it often called?", Q10: "Important aspects of the Reform Act of 1832 were: (Choose any two answers)", Q11: "When was the The Victoria Cross introduced?". It can be easily pointed out that these sample questions mainly emphasize 18. and 19. century history. Historically, those centuries have brought major changes such as Industrial Revolution and above all, 19. century has been called "century of ideologies".

Questions under the subtitle of "Church, state, freedom of religion" can be listed as follows: Q12: "What kind of a church is the national Church is the Church of Scotland?", Q13: "St. Andrew is the patron Saint of \_\_\_?", Q14: "The UK is historically a \_\_\_\_\_ country", Q15: "Who are the Protestant Christian groups in the UK?". The UK government especially puts a premium on patron saints and as an example of the importance given to the religion is that Study Guide's religion section starts with the sentence "The UK is historically a Christian society" (Aluko, 2007: 18).

"Administrations and formalities" subtitle questions includes samples such as Q15: "People in the UK have to pay tax on their income, which includes: (Choose any 2 answers)", Q16: "If you are self-employed, you have to pay your own tax" as they test the applicant's awareness of the administrative responsibilities.

"Lifestyles (referring to laws)" subtitle mainly consists of questions which refer to equality of man and woman. Q17: "Anyone who is violent toward their partner (whether they are a man or a woman, married or living together) can not be prosecuted (True-False)", Q18: "It is expected that women should stay at home and not work", Q19: "All citizens in the UK are being threatened \_\_\_\_\_ regardless of their origin". (The answer is given as 'equally') These examples show that it is expected from the prospective citizens to be aware that they will live in a democratic society.

The main category of “Economy, public service and its financing” starts with the “Education” subtitle. These sample questions are Q20: “At what age do children go to secondary school?”, Q21: “Governors and school boards have an important part to play in raising school standards, they have three key roles: (Choose any three answers). While in general they consist of some general information, some of them include questions in detail. However education part does not play a big role in the test.

“Economic order, finances” subtitle questions are sorted as follows: Q22: “From where does most of the money come for local services?”, Q23: “How can people open a bank or building society account?”, Q24: “Which cabinet minister is responsible of economy?”. These sample questions test prospective citizens’ general knowledge about economic system compared to work and self-employment, and Public service and its financing category questions.

Questions under the “Work and self-employment” subtitle can be listed as: Q25: “If you are a self-employed person, which one should you follow?”, Q26: “Should everybody who work as self employed or waged worker pay National Insurance Contributions?”. The government expects from its prospective citizens to work by being aware of their responsibilities and following the rules even when they are self employed.

“Public service, and its financing” sample questions are sorted as follows: Q27: “The small claims procedure is used for claims of less than \_\_\_\_\_ in England and Wales”, Q28: “For most people, the right amount of income tax is automatically taken from \_\_\_\_\_ and paid directly to HM Revenue and Customs (HMRC)”, Q29: “What are the National Insurance contributions collected for?”. These sample questions require that prospective citizens should have detailed information about public service.

“Health system” questions are mainly based on *National Health Service* related issues. These examples are such as: Q30: “Does National Health Service provide free service of healthcare to all citizens?”, Q31: “Where can you get your medical card?”. As they seem simple and useful questions, it is also important to know that NHS is a publicly funded but a private organization.

The final category titled “Traditions and public moral” starts with a very sensible subtitle “Lifestyles (referring to social norms). This subtitle generally takes part in European citizenship tests (mainly Germany, the Netherlands) as the concern comes from immigrants’ adaptation to daily life of the country. Life in the UK test questions of this subtitle are: Q32: “It is expected women to stay at home and not work. (True-False), Q33: “The fundamental principles of

British life include \_\_\_\_\_” (answers include a) respect of monarchy, b) respect of religion, c) participation in community life)

Questions under the subtitle of “traditions, cultural specificities of the host country” can be sorted as such: Q34: “A lot of People carve lanterns out of \_\_\_\_\_ and put a candle inside of them during Halloween”, Q35: “The most famous Tennis tournament hosted in Britain is The Wimbledon Championships, which takes place each year at the All England Lawn Tennis and Croquet Club”(True-False)’, Q36: “What is the name of the popular UK Tennis tournament played in South London?”, Q37: “What is the traditional meat served for Christmas Dinner?”, Q38: “Foods associated with England are: (Choose any two answers)”. As it can be realized, these questions are from a wide spectrum of British cultural values. This variety includes details from food to sport events.

Last subtitle of “How-to guide on etiquette” consists of questions on a general basis similar to the lifestyle questions such as Q39: “There is no place in British society for extremism or intolerance (True-False), Q40: “It is \_\_\_\_\_ to cause harassment, alarm or distress to someone because of their religion or ethnic origin”. These questions hiddenly seem to keep the new comers advised of British society’s high values.

Miscellaneous category of “other” includes questions such as Q41: “Famous British film directors are: (Choose any two answers)”, Q42: “The United Nations (UN) is an international organisation with more than \_\_\_\_\_ countries as members”, Q43: “There are charities which may help people who cannot afford to pay a vet”. Even though these questions barely take part in the test, it is possible to find one question from this category in the test randomly.

*Life in the UK* test has been widely criticized on the ground that it consists of questions from a pub quiz.) this article was published by The Guardian in 2013 referring to Brooks’s discussion on “The British Citizenship Test: The Case for Reform”. Introduction to British history part writer professor Sir Bernard Crick defended the questions from the criticism of the Historical Association that it was "a bizarre tour of British history" by saying it was written for immigrants and their language teachers and was not an official history (The Guardian, 2012). The United Kingdom’s central attitude towards immigration is implemented by the government policies, mainly after the Labour Party came into power in 1997, ‘citizenship’ became a high priority on the policy agenda (Kiwani, 2008: 60).

## Comparison and Conclusion

Citizenship tests have shown a general implementation attitude connected to immigration policies of the governments. It can be read in the language as Critical theory and Postmodernism put forward, knowledge creates and transforms power relations (Cox, 1986: 248). Knowledge of the power is presented with selected discourses in the tests. Within the tests, these ties can be found what point the states held in high regard and expected from their prospective citizens to adapt to before acquiring citizenship. The knowledge in these tests is taken from official history which the modern states wrote to pose themselves and be proud of their ‘illustrious’ history (as the UK defines its history in the handbook).

**Table 1:** Comparison of the tests’ discourses

	<i>Life in the UK</i>	<i>Naturalization Test</i>
<b>Patriotism</b>	Medium	High
<b>Religious concerns</b>	High	Low
<b>Social Norms/Behaviours</b>	High	N/A
<b>War Discourse</b>	Medium	High
<b>19th Century</b>	High	High
<b>Economic order and finances</b>	High	Low

Case countries have both similar and different approaches in their test creation methods. Starting from a core value such as patriotism, the UK shows a tendency of highlighting its patriotic ties in history part in questions such as Q1,10,11 on a medium level. On the other hand, in the discourse of the US, patriotism is held in high esteem compared to the UK. Its patriotic emphasis can be found in questions such as Q18,19, 28. Besides, the US continues this discourse when asking for allegiance, “*Support the Constitution. You must also be willing to support and defend the principles of the Constitution and the laws of the United States*” (See Appendix 3).

Religious concerns are considered as a liberal concern in terms of fundamental freedoms. In a complex social society which includes a variety of immigrants from many countries, the US stands out as the most flexible area considered to other countries. For instance, answer to Q7: “What is freedom of religion?” in Civics Flash Cards for the Naturalization Test is boiled down to

only one answer: “You can practice any religion, or not practice a religion”. As Kerber (1997: 834) defines, “It radically disconnected religion and political participation”. Orgad (2011: 1239) adds, “Americanization means the cultivation of a shared commitment to the American values of liberty, democracy and equal opportunity, as well as freedom of speech and religion and representative government”. On the other hand, the United Kingdom even starts showing signs of religious emphasis in the classification description of the test: Modern and thriving society section’s second subtitle is “religion”. Correspondingly, Q12,13,14,15 and much more in the *Life in the UK* test contains religious questions, also the Study Guide’s religion part. Religious stress is also linked to the UK’s historic and social features.

The comparison of social norms/behaviours probably remains as the most remarkable difference between these countries’ test discourses. As from a European point of view, social norms play an important role in society (it can also be seen in many other citizenship tests such as German, Dutch, Danish, Austrian etc.), however in American state mentality, social norms are most likely held in less regard and are left liberty for all citizens. (This argument has also been discussed widely by Robert Schuman Centre scholars in 2010). Joppke’s claim on the US as “heartland of liberalism” proves its example compared to European norms. As an example of this comparison, *Life in the UK* test Q32, 33, 39, 40 can be shown as a reflection of state’s expectation from prospective citizen on how to behave in their society. British government’s approach has been conveyed through politicians, as former prime minister Gordon Brown stated:

“Immigrants should be required to take part in community work before they are granted British citizenship..... People who want to become British citizens needed to enter a new “contract” which showed their willingness to contribute to their new home.” (The Telegraph, 2007)

He also emphasized the importance of required experience of prospective citizens by declaring,

“In any national debate on the future of citizenship, it is also right to consider asking men and women seeking citizenship to undertake some community work in our communities - introducing them to a wider range of institutions and people in our country prior to enjoying the benefits of citizenship.” (The Telegraph, 2007)

War discourse is created through several sources such as terrorism, fear and threats. In the US, it is undoubtedly related with sprawled terror discourse.

While questions such as 35, 36, 37 refer to war history of the country, Q39 and Q42 directly refer to “communism” and “enemies” of the country. This strong relation with the war discourse and terror threat can be linked to high patriotism level as well. This is a reflection as many organizations rethought, reorganized, or reaffirmed their goals and causes after 9/11 in ways that emphasized aspects of the transnationalist citizenship discourse (Abowitz and Harnish, 2006: 678). On the other hand, the UK reflects its war emphasis through “its illustrious history” in a softer image than the US. However, the discourse behind it can easily be associated with government’s policy. In the post-9/11 and especially 7/7 era, all parties started to share a common fear of domestic terrorism committed by immigrants (or citizens) who are not integrated in or loyal to the United Kingdom, thus creating political competition to advocate for increasingly restrictive measures (Morjé-Howard, 2009: 195). As Wright (2008: 1) pointed out, citizenship tests may be seen as a “knee-jerk, populist reaction” to fear of the newcomer. Therefore citizenship tests are subject to change their discourses in relation to global threats.

Reference back to the 1800s reserves the ideological background of Europe. While the US mainly asks about colonial period and independence, the UK tends to test its prospective citizens on the knowledge and important figures in the history. Similarly, 19<sup>th</sup> century incidents take part in both discourses of the tests. Yet, with the last changes in The Life in the UK test, the government declared to put more emphasis on British values (BBC, 2013).

As for economic order and finances category, Life in the UK test looks forward to apply usage to daily life with its detailed questions which require certain information. On the other hand, Naturalization test tends to ask more general questions in the field of economics mainly about the general order of the economics in the country.

Overall, the main differentiation between the UK and the US testing discourse stands out undoubtedly as Noah Pickus (2014: 162) argues that since the USA has long been conducting (and debating) citizenship tests as part of its naturalization process and there is relatively little appetite to stiffen these tests, as is the current trend in Europe, or to revive programs that “Americanize” new immigrants (Shachar, 2014: 119). However, it is still not ascertained that which type is the most convenient path to citizenship obtainment.

Above all, it is highly disputable that to what extent all these values can be adopted by new citizens as they must prove their “worthiness” of the ultimate prize of membership. As Shachar puts forward;

“Those not born as members who wish to obtain the security and dignity associated with the basic right to have rights must seek naturalization (from *nasci*, Latin, the etymological root of ‘to be born’); they must prove their ‘worthiness’ of the ultimate prize of membership.” (Shachar, 2014: 118)

This worthiness can be seen as a scale that states decide based on their expectations from their prospective citizens. Though, this stage can create tensions as some circles claim that the discourse in these tests is chosen deliberately in order to make immigrants feel uncomfortable even before applying (Aydın, 2007).

This process can be linked to “multiculturalism has failed” debates. In addition, multiculturalism itself has been discussed with its relation to postmodernism recently (Sidorkin, 2002; Jacobs, 2002; Clark et al., 1993; Rzyayeva, 2014). While these concepts stand individually, they have an interrelated structure. Referring to Ger Mennens (Open Democracy, 2011) it can be said that “given that postmodernity is a condition for successful multiculturalism, states that largely rely on party-democracies will have difficulty in adapting to multiculturalism, and fostering a politics of multiculturalism”. Similarly, Ossewaarde (2014: 3) points out that “since the 1980s, multiculturalism -in particular its positive discourse on migrants and its portrait of migrants as vulnerable, pitiful, and easy to manipulate and to exploit by those who are more powerful- has been under attack”. Its reflections were seen in leaders’ statements declaring “multiculturalism has failed” (BBC, 2010; BBC, 2011; The Telegraph, 2011). Unlike Europe, multiculturalism is still seems to have more chance in the US, hence its immigration policy is formed within its abovementioned state mentality. It can also be seen in the discourse of migration documents and naturalization tests.

Multiculturalism has failed debates and anxieties about immigrants and immigration are more visible, especially in Europe, where they have revealed a dark underbelly characterized by renewed fear of the “other” according to Shachar (2014: 118). Therefore this affects immigration policies and naturalization discourses of states. Debates about citizenship itself, what a citizen *gets* versus what a citizen *does* are notions of language rights, multiculturalism, and belonging (Ryan, 2011: 300). Taking into consideration all these perspectives, it can be said that classical citizenship definitions and the state of the art of citizenship are getting far apart from each other. This transformation seems to take different forms in the future since changing dynamics of immigration will shape the future of naturalization and citizenship policies.

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## APPENDIX

### Appendix 1. Michalowski's Classification:

**Table 1: Typical Questions from the category "Politics, History and Geography"**

1) Political system, democracy, rights:	<ul style="list-style-type: none"> <li>- What type of constitution does the UK have?</li> <li>- What are the two major political parties in the United States?</li> <li>- What is the function of elections in a democracy?</li> <li>- When did women receive the right to vote?</li> <li>- What are the minimum ages for buying alcohol and tobacco?</li> </ul>
2) History, geography, national symbols:	<ul style="list-style-type: none"> <li>- When were the Nazi and Adolf Hitler at power in Germany?</li> <li>- Which form of government did Austria have until 1918?</li> <li>- What ocean is on the East Coast of the United States?</li> <li>- Where are Geordie, Cockney and Scouse dialects spoken?</li> <li>- What are the colors of the Austrian flag?</li> </ul>
3) Church, state, Freedom of religion:	<ul style="list-style-type: none"> <li>- What is freedom of religion?</li> <li>- What is the Church of England and who is its head?</li> </ul> <p>The candidate knows that state law is above religious and traditional law.</p>
4) Administrations and formalities:	<ul style="list-style-type: none"> <li>- Where do you have to register when you move within Germany?</li> </ul> <p>The candidate knows the procedures to request and renew a driver's license</p>
5) Lifestyles (referring to laws)	<ul style="list-style-type: none"> <li>- Who is not allowed to live together as a couple in Germany?</li> <li>- Are honor killings forbidden and subject to prosecution in Austria?</li> </ul> <p>The candidate knows that open homosexuality is not forbidden by law.</p>

**Table 2: Typical Questions from the category “Economy, Public Service and its Financing”**

6) Education:	<p>- At what age do children go to secondary school? The candidate knows that education for children aged 5 to 18 is compulsory.</p> <p>-An adult woman wants to catch up with a final high-school exam. Where can she do this?</p>
7) Economic order, finances:	<p>- What is the economic system in the United States? -How can people open a bank or building society account?</p>
8) Work and self-employment:	<p>- Where can people get advice on setting up their own business? The candidate knows how to find job offers in the Netherlands.</p>
9) Public-service, and its financing:	<p>- When is the last day you can send in federal income tax forms? The candidate knows why taxes are important.</p>
10) Health system:	<p>- What is National Health Service direct, and NHS direct online? The candidate knows that a generalist refers to a specialist.</p>

**Table 3: Typical Questions from the category “Traditions and Public Moral”**

11) Lifestyles (referring to social norms)	<p>- The candidate knows that women and girls are expected to set up their own livelihood. The candidate knows that it is accepted in the Netherlands for couples (also same-sex couples) to live together without being married.</p>
12) Traditions, cultural specificities of the host country:	<p>- What is an Easter tradition in Germany? The candidate is familiar with the most relevant Dutch public holidays and their religious or historic meaning.</p>
13) How-to guide on etiquette:	<p>- The candidate knows that the Dutch can be very direct and therefore does not easily get offended by directly expressed opinions and questions. The candidate knows what the usual manners in day-to-day situations are.</p>

**Table 4: Typical Questions from Category “Other”**

14) Other:	<p>-Which organizations can people rent houses from?</p> <p>-In Germany, many people work as volunteers during their free time. What does this mean?</p> <p>-What services are offered by vets?</p>
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## Appendix 2. US Naturalization Requirements

### Examples of Things that Might Demonstrate a Lack of Good Moral Character

- Any crime against a person with intent to harm.
- Any crime against property or the Government that involves “fraud” or evil intent.
- Two or more crimes for which the aggregate sentence was 5 years or more.
- Violating any controlled substance law of the United States, any State, or any foreign country.
- Habitual drunkenness.
- Illegal gambling.
- Prostitution.
- Polygamy (marriage to more than one person at the same time).
- Lying to gain immigration benefits.
- Failing to pay court-ordered child support or alimony payments.
- Confinement in jail, prison, or similar institution for which the total confinement was 180 days or more during the past 5 years (or 3 years if you are applying based on your marriage to a United States citizen).
- Failing to complete any probation, parole, or suspended sentence before you apply for naturalization.
- Terrorist acts.
- Persecution of anyone because of race, religion, national origin, political opinion, or social group.

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### **Appendix 3. Attachment to the Constitution**

All applicants for naturalization must be willing to support and defend the United States and our Constitution. You declare your “attachment” to the United States and our Constitution when you take the Oath of Allegiance. In fact, it is not until you take the Oath of Allegiance that you actually become a U.S. citizen. If you are unwilling or unable to take the Oath of Allegiance in its entirety please see Page 38 for more information.

**What does the Oath require?** When you take the oath, you must promise to do three things:

**(1) Renounce Foreign Allegiances.** As stated in the oath, you must renounce all foreign allegiances to become a U.S. citizen.

**(2) Support the Constitution.** You must also be willing to support and defend the principles of the Constitution and the laws of the United States.

**(3) Serve the United States.** When required by law, you must be willing to (a) fight in the U.S. Armed Forces, (b) perform noncombatant service in the U.S. Armed Forces, and (c) perform civilian service for the United States.