Portuguese Immigrants and Citizenship in North America

People born in Portugal - both on the mainland and from the Azores have been migrating to all corners of the globe for hundreds of years. In the 20th century, this migration stream became a torrent during certain periods; Teixeira and Lavigne (1992) estimate that in the tenyear period from 1964 to 1974 about 100,000 Portuguese were leaving the country every year. A substantial number of these immigrants ended up in North America, either moving to the

United States, particularly New England and California, or to Canada, especially in Ontario. Yet, little is known about the comparative experiences of these immigrants. Those who went to North America were very similar in many respects, sharing a common culture and religion, leaving behind a dictatorship and, in most cases, also leaving behind intense economic hardship. Did it make a difference whether a Portuguese immigrant went to Canada or the US ? In this paper I look at the naturalization processes of Portuguese immigrants in North America – their propensity to acquire the citizenship of their new host country – and I argue that the political culture and institutional configuration of Canada facilitated and encouraged naturalization among Portuguese immigrants to a much greater extent than in the United States.

Numerous studies have documented that immigrants to Western Europe become citizens at widely varying rates because of the different citizenship laws in each country (Brubaker 1992). In North America, however, a common history as immigration countries has led to very similar and generous regulations governing naturalization. Consequently, it might be expected that naturalization patterns in the United States and Canada should be roughly equivalent. Yet, according to census data, in 1990 only 43 % of all adult, Portuguese-born residents of Massachusetts had naturalized, compared to 57 % of all adult Portuguese in Ontario¹. Furthermore, if one looks at immigrants who had lived in their respective host countries for ten years prior to the census, one finds that while 62 % of the Portuguese in Ontario have become Canadian citizens, the comparable figure for the US is

^{1.} Data is from 1991 in the Canadian case. American statistics were generated from the 1990 5 % Public Use Microfiles of the Census Bureau, while Canadian statistics come from the 3 % Public Use Microfiles from Statistics Canada. Massachusetts and Ontario were selected for analysis because they both have large populations of Portuguese immigrants.

only about 17 % (see Table I for more details). The difference is enormous, and begs further investigation.

In this paper, I consider a number of potential explanations for this gap, highlighting the limits of past theories. Using the case of Portuguese immigrants in Ontario and Massachusetts, I suggest that differences in rates and level of naturalization for the Portuguese in the two countries can be understood by examining the different ways in which the State encourages – both symbolically and financially – immigrant communities and individuals to naturalize. I suggest that in Canada there exists a top-down approach to naturalization: the process is actively encouraged by the federal government through policies like official multiculturalism, while support and funding from federal agencies make it easier for community organizations to help immigrants to become citizens. In contrast, the US naturalization process is more generally bottom-up: grassroots organizations are expected to mobilize on their own, with little or no support from the State, while federal agencies can be seen as forbidding and unhelpful, more interested in policing frontiers than in encouraging immigrant incorporation.

Is there *Really* an Unexplained Difference in Naturalization Rates?

Two approaches currently found in the academic literature could conceivably be used to explain the difference in Portuguese naturalization levels in North America. The first one looks at the formal rules and regulations governing citizenship acquisition. This approach is popular in Europe where researchers have investigated cross-national differences in the legal apparatus surrounding citizenship, as well as the effects of these differences on actual incorporation rates. A second explanation is more popular among scholars in « New World » countries ; it focuses on the characteristics of individual immigrants, argues that socio-economic and demographic attributes affect individuals' ability and motivation to acquire citizenship. I contend that while both arguments have merit, none can adequately account for the observed naturalization gap between Portuguese immigrants.

Formal Institutional Explanations

An obvious reason why there might be a difference in citizenship patterns in the US and Canada would be because the laws governing naturalization are different. A rich European literature investigates the reasons for, as well as the consequences of, different citizenship laws in Western Europe (Brubaker 1992; Layton-Henry 1990). The classical formulation of this argument compares the more inclusive French regime to the restrictively ethnic German pattern which only accords citizenship on the basis of blood². It is consequently argued that one of the biggest obstacles for many immigrants in Europe are restrictive regulations.

^{2.} The new Social Democratic government in Germany, elected in October 1998, has indicated that it will loosen and open citizenship to German-born children of guestworkers, but there is heated political debate around the issue.

	United States				US %/Cnd %	Canada			
	Portuguese Immigrants		Portuguese Naturalized			Portuguese Naturalized		Portuguese Immigrants	
Year of Entry	Number	% of total immigration	Number	% of total period		% of total period	Number	% of total immigration	Number
before 1950	4,402	4.95	3,732	84.78	-15.22	100.00	33	0.02	33
1950-1959	3,940	7.89	3,108	78.88	-4.38	83.27	6,800	1.70	8,167
1960-1964	5,211	14.69	3,265	62.66	-16.02	78.67	9,100	6.97	11,567
1965-1969	18,688	31.99	9,108	48.74	-19.82	68.56	15,700	7.48	22,900
1970-1974	13,842	24.88	5,718	41.31	-17.85	59.15	21,000	11.23	35,500
1975-1979	12,683	22.56	3,302	26.03	-25.91	51.95	4,000	4.88	7,700
1980-1981	3,105	8.80	545	17.55	-35.73	53.28	2,167	4.37	4,067
1982-1984	2,023	5.08	254	12.56	-49.44	62.00	1,033	2.50	1,667
1985-1986	1,753	4.92	322	18.37	-16.67	35.04	1,600	4.12	4,567
1987-1990	2,542	3.61	356	14.00	11.32	2.69	300	3.76	11,167
TOTALS	68,189	12.97	29,710	43.57	-13.95	57.52	61,733	4.88	107,333

 Tabl. I. – NATURALIZATION LEVELS OF PORTUGUESE-BORN RESIDENTS OF ONTARIO AND MASSACHUSETTS

 Adults 18 years old and over, non-institutionalized population

Source : 1990 US Census, 5 % Microfiles, and 1991 Canadian Census, 3 % Microfiles.

Since North American citizenship laws are very inclusive in comparison to Europe, and citizenship is generally encouraged, almost no scholarship has focused on the influence of formal institutional factors in the North American context³. It is assumed that North American laws present only a minor obstacle to citizenship acquisition, and that consequently variations in naturalization rates must be due to the choices of individual immigrants. And indeed, when we consider the laws governing naturalization in Canada and the United States, they are extremely similar, as can be seen in Table II below. In both countries, costs are relatively low required residency periods are short, and both administer language and basic knowledge exams. The only two differences of note are the slightly shorter residency requirement in Canada, and Canada's official recognition of dual citizenship since February 1977. Neither of these differences can really account for that in Portuguese naturalization rates.

The difference in residency requirement, a mere two years, would suggest that immigrants to Canada might initially acquire citizenship faster than immigrants to the US. Surprisingly, if one examines the cohort of Portuguese immigrants who entered the US between 1987 and 1990, 14 % of the Portuguese-born residing in Massachusetts claimed citizenship in the census of 1990. In comparison, only 2.7 % of a similar recent cohort of Portuguese immigrants in Ontario⁴ reported that they were Canadian citizens at the time of the 1991 Canadian census⁵. In any case, the effect of the slightly different requirements should cease to matter about six or seven years after entry as immigrants in either country would be allowed to apply for citizenship. Yet, as mentioned in the introduction, even after living in North American for ten years, there exists a significant gap in naturalization rates.

The other major difference in the two countries' citizenship laws relates to dual citizenship. Since February 15, 1977 Canada officially recognizes it. In contrast, the US oath of allegiance – which all adult immigrants must swear when they become citizens – requires that the applicant denounce all former allegiances. A number of European commentators have argued that dual citizenship rules – or a lack thereof – might prevent immigrants from applying for citizenship in their new home country (e.g. Hammar 1990). Does a lack of explicit recognition of dual citizenship on the part of the US government explain cross-national variation in naturalization patterns ?

^{3.} A partial exception is Brubaker's 1989 edited volume which looks at citizenship on both sides of the Atlantic. However, the main thrust of the book is a comparison between open North American regimes and more closed European ones, not an examination of variation between North American regimes.

^{4.} The comparable cohort, given the Canadian census, are all those permanent residents who entered the country between 1987 and 1991.

^{5.} One explanation for this counter-intuitive finding could be data problems and measurement error, likely on the US side, since respondents in this earliest cohort would not have been in the country for the five-year normal residency requirement. Such data problems should not, however, be exaggerated. It is entirely possible that a large portion of the people claiming citizenship status are the spouses of American citizens or fell into various other special cases where residency requirements are less strict. The number of cases is rather small, and could be heavily influenced by some exceptional circumstances. Furthermore, naturalization before the five-year residency period elapses is more common than most might expect : INS tracking of a 1977 immigrant cohort reveals that after four years of residency, 4 % of the cohort had already become citizens (INS 1997 : 140).

	Canada	United States
Minimum age	must be at least 18 years old	must be at least 18 years old
Status	must be a legal permanent resident	must be a legal permanent resident
Residency Requirement	must have lived in Canada for at least three of the previous four years before application	must have lived in the US for at least five years, with absences totalling no more than one year, and have residence in one State for at least three months*
Language Requirement	must show oral ability in English or French, and some simple reading and writing ability in either of those languages	must show ability to read, write, speak and understand « ordinary » English (exceptions : those over 55 years of age living in the US over 15 years, or those over 50, living in the US over 20 years)
Knowledge Requirement	if between the ages of 18 and 59, must show basic knowledge of Canada (history, geography, political institutions)	must demonstrate knowledge and understanding of fundamentals of US history and government (« special consideration » is given to those with impairments or over 65 years of age with at least 20 years of residence)
Grounds for Refusal	certain criminal offenses, as well as being deemed a security danger	certain criminal offenses, and/or a failure by the candidate to show that they are of « good moral character »
Oath of Allegiance	required	required
Cost	\$ 200 CND per adult; \$ 100 per child. If citizenship is refused, \$ 100 of the adult fee is reimbursed.	\$ 225 US per application (formerly \$ 95)
Dual Citizenship	officially allowed since February 15, 1977	the oath of allegiance includes a phrase renouncing « foreign allegiances » (various legal judgements, as well as growing numbers of dual citizens have led the American gov't to a more or less <i>de facto</i> recognition of dual citizenship).

Tabl. II. - NATURALIZATION REQUIREMENT IN CANADA AND THE UNITED STATES, SPRING 1999

* There are a number of exceptions under which one may apply for citizenship before five years of residency are completed. The most common case is for the spouses of US citizens, who can apply after three years of residency.

I believe that the effect of the oath of allegiance, particularly its requirement to renounce former allegiances, can only explain a very small amount of the difference between Canadian and American naturalization patterns, and that it likely makes no difference. There are at least three reasons to believe this. First, while US law formally asks that immigrants renounce their former citizenship, in practice the INS (Immigration Naturalization Service) almost never takes action if a naturalized American uses the former country's passport outside of the US. Second, while the oath of allegiance requires immigrants to renounce past citizenship, foreign governments are not required to recognize this renunciation, and in many cases, do not recognize it. Finally, for most immigrants who plan to remain in their country of destination - be it the United States or Canada -, the critical issue is not whether the host country recognizes dual citizenship, but whether the home country does. In other words, for a Portuguese immigrant living in either the United States or Canada, the benefits of naturalization and citizenship in either country are assured while he or she resides there. On the other hand, the immigrant might be very worried about property in the country of origin, free movement into the country of origin, or rights in the home country that are only accorded to citizens. Thus, it is not American citizenship which is important to this immigrant, but whether Portugal will continue to consider him or her a national. The critical issue is knowing whether Portugal recognizes dual citizenship. Since this paper only considers Portugueses, I contend that dual citizenship regulations cannot account for the North American naturalization gap. Indeed, the citizenship laws and regulations of the two countries are so similar that it would seem that formal institutional differences cannot account for the very different naturalization patterns we see between Portuguese immigrants living in Massachusetts and Ontario.

Micro-Level Explanations : Demographics and Socio-Economic Variables

Since naturalization laws are relatively open in North America, most researchers in the United States and Canada believe that naturalization patterns are a function of individual-level characteristics such as years of education, age, and ability to speak English. Almost all of these researchers only focus on one host country, the United States or Canada. However, the individual-level explanation can be extended to a cross-national study. The strong argument from this perspective would be that acquiring citizenship, a personal decision that each immigrant must make for him or herself, is entirely determined by the immigrant's demographic and socio-economic background. The higher rate and level of naturalization in Ontario would, according to this argument, merely be a function of the fact that different types of Portuguese immigrants go to Canada as compared to the US. There are at least two variants of this line of thought : one argues that personal characteristics influence cost/benefit decision-making regarding citizenship (e.g. Kelley & McAllister 1982; Jasso & Rosenzweig 1986, 1990; Yang 1994); another focuses on how personal attributes shape the motivations and ability of people to naturalize (e.g. Verba, Scholzman & Brady 1995).

In the North American case, it is very difficult to make either of these arguments. In a purely cost/benefit calculation, the benefits of citizenship do not seem any higher in Canada than in the United States. Prior to 1996,

and thus for the period covered by the census statistics, civil and social benefits in Canada and the US were open both to citizens and permanent residents, and there are few instances in either country where one receives benefits from citizenship which one cannot get from permanent residency status⁶. The main difference is that in the US it is easier to sponsor family members to come to the US when one is a citizen than when one is a permanent resident. This distinction does not hold for Canada. If anything, therefore, a pure cost/benefit analysis would predict higher naturalization rates in the US since the sponsorship benefit might spur immigrants to become citizens (see, for example, Jasso & Rosenzweig 1986). Yet, naturalization is higher in Canada.

In terms of personal characteristics, the argument is that differences in such things as education, age and income can shape naturalization by influencing both the motivations for becoming a citizen and, probably more importantly, by affecting the ability to do so. However, the Portuguese immigrant communities in Ontario and Massachusetts are strikingly similar. While it is obviously impossible to randomly assign immigrants to live in the US and Canada, the reality of Portuguese migration is not that far off this imagined scenario. In-depth interviews indicate that the vast majority have family members living in the other country⁷. In at least one case, the migration experience of two brothers was not far removed from the randomization found in laboratory experiments : recruiters from the US and Canada came to their island in the Azores and indicated that all those men interested in immigrating were to go to a nearby town on a certain day. Seeing little future in the Azores, both brothers went to the designated site. One was put on a plane to the US, while the other was sent to Canada. Although this case is somewhat exceptional, it underscores the fact that the source of Portuguese migration to North America is very similar regardless of country of destination. Teixeira and Lavigne (1992) show that 60-70 % of all Portuguese immigrants to North America are from the Azores. Anderson (1983) confirms this pattern for Toronto, while Ito-Alder (1980) does the same for the suburbs of Cambridge and Somerville in Massachusetts⁸. While there exists some small inter-island differences between Azoreans - mostly around dialects or cultural practices -, the overall picture is of broad similarities. The Azores, a group of islands situated in the Atlantic ocean half way between Lisbon and New York, were not only physically isolated from the Portuguese mainland, but historically were also largely neglected by its government. Prior to the Portuguese revolution of 1974, the Azores were an impoverished peripheral area, offering little education and few job opportunities to its inhabitants. A few, often absent, landowners possessed most of the farmland, leaving the majority of the population to engage in subsistence farming, or to work as day labourers. Free schooling was only

^{6.} In 1996 the US Congress passed a law restricting the right to a number of social benefits only to US citizens.

^{7.} In-depth interviews were conducted between July 1997 and December 1998 with 22 Portuguese-born immigrants residing in the greater Boston area and 14 residing in the greater Toronto area. Most interviews were in English, though three were done in Portuguese with the aid of an interpreter. Interviews lasted from one to three hours and loosely followed a pre-set schedule of open-ended questions. Respondents were chosen using a combination of convenience and snowball sampling, and included both ordinary immigrants and community leaders. Interviews were supplemented with documentary information obtained from a number of community organizations catering to Portuguese individuals.

^{8.} These two towns are part of the greater Boston metropolitan area.

available up to grade four, and there was no university or any institutions of higher education on the islands. As a result, most Portuguese immigrants to both countries have extremely low levels of educational attainment. Despite little education, they have workforce participation rates similar to the native born in North America. In both Ontario and Massachusetts, Portuguese immigrants engage is very similar manual and semi-skilled jobs. For example, many Portuguese women are employed as cleaners or factory workers, while men work in construction or also in factory jobs. Table III summarizes various socio-demographic features of Portuguese-born residents in Ontario and Massachusetts based on 1990/91 census data.

The largest difference between the two groups as indicated in Table I is the use of English (or French in the Canadian case) in the home. It could imply that Portuguese immigrants in the US are less able to pass the citizenship exam because of poorer English language skills. However, it is far more likely that it merely reflects measurement differences due to dissimilar question wording in the two censuses : the Canadian question asked whether one spoke *mostly* English in the home, while the US figure was constructed from questions implying that one speaks only English. The 21 % difference is likely due to the fact that a number of US respondents speak mostly English in the home, but occasionally use Portuguese. Interviews with community leaders in both countries did not reveal any perceived difference in language skills in the two immigrant groups. Based on both the statistical data available on Portuguese immigrants in North America, and in-depth interviews with members of these communities, it seems very improbable that the naturalization gap is a simple function of differences in individual-level characteristics.

Although it is does not help us in the cross-national comparison, it would be foolish to imagine individual-level factors do not influence naturalization since they help to explain variation within immigrant groups or between them. I would contend, however, that often consideration of individual characteristics and decision-making seems to occur in a social vacuum. Because such factors are studied in isolation from the social context in which decision are taken or in which certain characteristics become valued or a hindrance, the impact that the broader social context has on such decision-making and on the relative importance of individual characteristics is ignored. Individual characteristics are important, but their importance is derived from the surrounding environment. While immigrants may have the same characteristics and initial desires when they move to a new country, the host society has a powerful influence on how those characteristics become mobilized, and how immigrants formulate and understand their desires. Individual characteristics thus interact with the broader political and institutional context.

Portuguese-Born Residents of... Ontario Massachusetts number of Portuguese-born 107,333 68,189 4.9 % % of immigrant population 13.0 % 57.5 % 43.6 % % naturalized modal immigration period the largest migrant wave came in largest immigrant wave came in 1965-1971-1975, second largest 1966-1970 1969, second largest in 1970-1974 average age 42.6 years 45.1 years % female 49.8 % 50.5 % educational attainment 29 % have completed high school or 29 % have completed high school or have more than a high school have more than a high school education; 49.4 % have only education; 54.3 % have only completed grade 8 or lower completed grade 8 or lower % who use English/official language 28.1 % 7.1 % in home*

Tabl. III. – CHARACTERISTICS OF PORTUGUESE-BORN RESIDENTS

* Since Canada has two official languages, English and French, in the Canadian case respondents indicating either of these languages were counted. Theoretically, English language use in the home can measure integration into the host society (Liang 1994) or ability to pass the citizenship exam (Jasso & Rosenzweig 1990). According to either line of reasoning, speaking French in Canada would measure the same idea as speaking English in the US. (As it stands, including French linguistic ability only adds one more respondent to this category in the case of Ontario).

Reflections on Macro-level Determinants of Naturalization

In-depth interviews conducted in the Toronto and Boston areas highlight the complex interaction of societal, group and individual-level variables when it comes to naturalization, and they underscore the fact that single factor explanations are impossible⁹. Instead, various small pieces interact to create an environment that is more, or less, conducive to citizenship acquisition. In this section, I look specifically at two aspects of the broader social environment that impact citizenship : the normative political culture of a country and the institutional aid available to immigrants.

The Meaning of Citizenship

Both the United States and Canada overhauled their immigration policies in the 1960s to be race-neutral, ending systems that had been aimed at keeping out non-Whites. Symbolically, these changes indicated a new mindset as to who could be American or Canadian; substantively, they opened the door to a new period of immigration, one that is now characterized by substantial migration from Asia, and especially in the US case, from Mexico and South America.

The political culture which developed in response to this immigration has been quite different in Canada and the United States. In Canada, the federal government adopted an official policy of multiculturalism in 1971¹⁰. Though initially largely symbolic, multiculturalism committed the Canadian government to helping all groups retain their specificity and to aiding overcome cultural barriers to full participation in Canadian society (Fleras & Elliot 1992). The central idea was that immigrants and their descendents could be both proud Canadians, and celebrate their distinct cultural heritages. Federal multiculturalism policy rose in prominence during the 1970s and into the 1980s to the point that an official Multiculturalism Act was passed, and multiculturalism became an independent ministry. More recently, multiculturalism has been demoted to being an administrative branch under the Secretary of State. Despite its highs and lows, and the ferocious debates that often surround multiculturalism, the policy has nonetheless been widely accepted as a normative stance within Canadian government and society.

In the US, there has been no comparable official stance towards new immigrants, nor a similar push on a symbolic or normative level to include newcomers through citizenship. The US does, of course, have a history and an ethos of being « a country of immigrants », but such a symbolic message has not been promoted as the official policy of the government. The US

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^{9.} These interviews were conducted in 1997 and 1998. In many cases, the information provided focused on experiences and situations in the 1990s and thus does not speak directly to the data from the 1990/1991 censuses. I am operating on the assumption that the 1990s saw continued Canada-US differences, at least up to the 1996 Welfare Reform Act. Consequently, I feel that these interviews and other data collected in the 1990s still offer insight into the cross-national variation highlighted by the 1990/1991 censuses.

^{10.} The original policy of multiculturalism was not really in response to new immigration; rather, it was mostly directed at European immigrants unhappy at the move by the federal government towards a policy of official bilingualism and possibly biculturalism. Furthermore, some commentators have argued that multiculturalism has little to do with immigrants, and was really intended as a way to attack the growing separatist movement in Quebec (see Fleras and Elliot 1992). Whatever its origins, multiculturalism developed a life of its own, changing focus as the migration stream to Canada changed.

agency that deals with immigration, the Immigration and Naturalization Service, is like its current Canadian counterpart (Citizenship and Immigration Canada) in that it includes both migration and citizenship within its mandate and functions. However, the INS has never been an autonomous department of the State, unlike in Canada, perhaps underscoring its lesser importance in the American context. Furthermore, the fact that the INS is housed in the Department of Justice implies a stronger emphasis on law-and-order issues than on naturalization. Indeed, much of the political debate within the US during the 1980s and 1990s has dealt with illegal immigration and, more specifically, control of the borders. The implied message, in contrast to Canada, is that immigrants are to be treated with suspicion.

Î would argue that there is a broad difference in the political culture on either side of the US-Canada border that affects the naturalization of immigrants in important ways. In Canada, immigrants are welcomed as part of official State policy, and citizenship is encouraged as State policy. However, within the rhetoric of multiculturalism, to become a Canadian citizen does not necessitate abandoning certain cultural particularities. Citizenship means participation, not assimilation. In contrast, the US place more emphasis on the control and containment of immigration. There is no official policy encouraging citizenship. The message to immigrants in the US seems to vacillate between suspicion and the desire to assimilate newcomers.

It is unclear how strongly this difference in political culture motivates individual immigrants living in the two countries, though in the interviews I conducted, it seemed that the Portuguese respondents living in Canada were slightly more emotionally committed to citizenship as a means for participation than their compatriots living in the United States. One respondent, a well-educated person who today owns a business in Toronto, explained :

« Heck, I mean, you don't become a full citizen in a sense of – I'm not talking citizenship now, but in a sense of a citizen in your community – until you have all the rights, privileges, and obligations that being a citizen of the community means. And you don't really get that until you meet the requirements of the law, to do that ».

It is not only well-educated respondents living in Canada who expressed such sentiments. Arminda moved to Canada when she was ten and went to school until she was about 17, but then had to work to help support her family. Now in her 40s, she later went to secretarial school and is currently working as a receptionist. When I asked her whether she was a citizen, she said she was, but professed to be embarrassed that it had taken her almost 20 years after she was legally able to naturalize before she actually did acquire Canadian citizenship. When she finally did naturalize, it was because of an up-coming federal election : she did not want the Conservative party in power to win again, and thus she wanted the right to vote in that election.

Portuguese immigrants living in the United States also express warm feelings towards the US, but usually this is not phrased in terms of being part of a political community. Franco, a working class immigrant living in Cambridge, said that he naturalized because he felt like he was « one of the boys » and thus he wanted to be an American. Likewise, Theresa, who has an 8th grade education and co-owns a business, felt that she was basically an American, and that citizenship would reflect this fact. Now that they are citizens, both do vote, though not always, but it seems that neither was specifically motivated to become citizens in order to be part of a (political) community, though they did see themselves as members of an American community.

Other immigrants living in the Boston area expressed more instrumental reasons for becoming citizens. Once more recent immigrant who holds a middle-class occupation said that he is worried about legislation that hurts non-citizens, and that this, coupled with the fact that Portugal now allows dual citizenship, led him to apply to be an American. Two other male immigrants, both who initially did manual labour upon immigrating to the United States, became citizens for job-related reasons. One man wanted to work in a company which is a defense contractor for the US government, but was not eligible for employment unless he was a citizen. The second, who worked as a cleaner, was not allowed in a certain US government building to clean because he was not a citizen. Thus, both were spurred on to naturalization for reasons that seem more instrumental than for reasons of participation and belonging to a community.

This is not to say that Portuguese immigrants in Canada also do not express instrumental reasons when they explain their naturalization decisions. Mario moved to Canada when he was a teenager, but initially planned to go back to Portugal. However, he nonetheless became a citizen of Canada after five years in his new host country because he often had bureaucratic problems leaving Portugal when he went back home to visit. Since he was young, the government expected him to go into the army to serve his draft duty, something that Mario did not wish to do. For him, Canadian citizenship helped avoid this administrative hurdle to visiting Portugal, and removed the danger of being drafted.

It is thus not entirely clear if Portuguese immigrants in Canada have internalized the message of multiculturalism, and that this is the reason that they are more likely to become citizens. However, there seems a slightly greater tendency for Portuguese immigrants living in the greater Toronto area say that they became citizens to participate in a community as compared to immigrants living in Massachusetts. For the latter, emotional feelings of being an American play a role, but these are general feelings, not specifically tied to something such as political participation, and they are accompanied by instrumental reasons for naturalization.

Institutions and the Process of Citizenship

In contending that political culture has an effect on naturalization, I do not want to suggest that there is only a simple and mechanical relationship between civic norms and individual-level behavior. Reitz and Breton (1994) maintain that the differences between Americans and Canadians in terms of public opinion regarding immigration and ethnic differentiation is mostly insignificant, despite the myth of the Canadian mosaic versus the American melting pot. Symbolic stances might matter, but the mechanisms of the link between norms and behavior needs to be specified. I therefore wish to underscore that these normative stances are significant not only in themselves, but more importantly because they result in institutional practices and material commitments that supply the mechanism by which symbolic policies (explicit or implied) become translated into social phenomenon.

More specifically, the Canadian position of multiculturalism and promotion of citizenship translates into a top-down naturalization process in which the State first encourages immigrants to become citizens, and then makes it easier for them to do so. In contrast, the US case is characterized by a bottom-up process which leaves most of the motivational work and provision of practical aid in the hands of grassroots organizations. As well intentioned as these local level groups may be, the absence of State intervention results in lower naturalization rates.

Portuguese immigration to the Boston area dates from the end of the 19th century (Allen & Turner 1988), while more generally the Portuguese have been coming to Massachusetts since the early to mid-1800s, first as whalers, then as workers in burgeoning industrial towns, such as Fall River and New Bedford. Considering this long history of immigration, one would expect to find a number of well-developed, long-standing institutions aimed at serving the Portuguese community. Surprisingly, there are relatively few of these community groups in the Boston area. The oldest groups include a fraternal life-insurance society founded in 1925, a Portuguese Credit Union established in 1928 and a couple of social clubs. Currently, other organizations include a social-service agency, newer social clubs, and St. Anthony's Catholic Church. None of these organizations has ever led a concerted citizenship drive.

Today, the key Portuguese community organization is the Massachusetts Alliance of Portuguese Speakers (MAPS). It has offered some citizenship services intermittently in the last five to seven years, but its main focus is on the provision of social and health services, such as counseling and AIDS education. This focus is a direct result of its funding, which comes from Massachusetts State grants tied to specific social-service goals, and from agencies such as the United Way. One member of the Portuguese community told me that ten years earlier an older form of the same organization had demanded large fees before aiding community members with immigration issues, and that the current organization often turns people requesting citizenship help away due to staffing problems¹¹.

In the spring of 1998 a community-wide drive to encourage citizenship was undertaken for the first time in the Boston-area Portuguese community. Notably, it was not begun by the social-service agency itself, but by a private citizen who, according to most sources, single-handedly brought together a variety of individuals and Portuguese associations in order to promote citizenship within the community. The reasons for the drive are apparently two-fold : first, with the Welfare Reform Act of 1996, there is added importance attached to citizenship status, and second, citizenship is seen as a necessary first step to political involvement, an area in which the Portuguese community has been very inactive¹². This person received no help from the US federal government in putting together her citizenship drive.

^{11.} In the last few months, MAPS has received funding to hire a special citizenship coordinator. I discuss this further below.

^{12.} Indeed, there are some who say that the chief organizer of the citizenship drive started the campaign as a result of a failed election bid. The person ran for a position on municipal council, but was not able to mobilize the Portuguese community at least partly because a large number were not citizens and thus not allowed to vote.

The Portuguese immigrant who speaks some English, but needs help with government forms and is uncertain about the exact naturalization procedure, has three options for finding help and information. The most common, and the one likely found in all ethnic communities, entails the use of friends and family members. Ignes, who lives in Somerville, had her school-age daughter help her with the English and citizenship exams, while José was asked for help by a neighbor. However, this system has serious limitations in the Portuguese community since many of it are illiterate, have not themselves acquired citizenship, or are suspicious of government agencies. As a result, most of those who use family members and friends for help must rely on children who have gone through the US school system, children who either were very young when they immigrated, or who were born in the US. In some families, such intergenerational help is actively sought, but in others, parents are too proud to ask their children for help¹³.

If family and friendship networks are not feasible, there exists a network of private business that offer a second path to citizenship. Those who own businesses tend to have a better grasp of English than other members of the community, and they are more familiar with filling out government forms and other such red tape. Francis, for example, is the owner of a successful business that serves the Portuguese community in the Boston area. She is frequently asked for help in immigration or other bureaucratic matters. She tends to become somewhat impatient with some members of the community, people who are too afraid to ask for help directly from government agencies when it comes to permits, licenses or even citizenship; she feels that the Portuguese should overcome their fear of civil servants and just ask for help when needed. Nevertheless, she often does aid those who come to her with paperwork. Francis is an exception, however, in that her assistance is generally free. The majority of private business owners, such as those who run travel agencies, sell insurance, or work as lawyers, will help fill out naturalization forms, but only for a fee. When Maria became a citizen, she made use of such a service because she did not know what she was supposed to do, and she did not have enough confidence in her English skills to fill out the forms herself. Private businesses are thus an alternative pathway to citizenship, but it can be costly, a fact that might stop some immigrants from taking this route.

These two paths to citizenship – through friends and family or through private businesses –are very similar in both Toronto and Boston. The difference between the two cities can be seen in the third path to citizenship, notably the use of non-profit organizations or social-service providers. There are more links between ethnic organizations and the State – especially the federal government – in the Canadian case, thus allowing the State's symbolic preferences to have a greater influence on Canadian groups. Funding in the past also tended to be more generous in Canada, notably in allowing federal money to go to administrative or operating expenses, while in the US most monies – mostly from the State of Massachusetts or private foundations – are carefully tied to specific programs.

^{13.} See Noivo (1990) for a study of intergeneration relations in Montreal Portuguese families and how these hurt both the families and the individuals living in them.

Portuguese immigration to Canada has a much more recent history than to the US. The first Portuguese immigrants came to Canada in the early to mid-1950s under farm labour programs. Given that, it is striking to note that the first attempt to engage in a unified citizenship campaign actually occurred slightly earlier in Toronto than in the Boston area. In Toronto, discussion for a citizenship campaign got underway in 1994-95, while in the Boston area it did not occur until 1998.

The push to naturalize within the Canadian Portuguese community did not, however, originate with the leaders of the community. While people had long spoken of doing something related to naturalization, it was prodding by federal bureaucrats working within the program of multiculturalism that provided the catalyst for organization. The already existing Portuguese Interagency Network (PIN) - subsidized with federal and provincial grants - became the initial link between the Portuguese community and federal bureaucrats. These civil servants encouraged PIN, and the Portuguese community more generally, to tap into federal funding and grants available to ethnic communities through multiculturalism. They made suggestions for issues to be addressed - including citizenship - and they encouraged community members to form a pan-Canadian Portuguese National Congress, an umbrella organization which would be similar to the already existing, and quite influential, Jewish National Congress and Italian National Congress. The Ministry of Multiculturalism and Citizenship, as it was then named, gave a block grant to fund an initial organizing meeting to be held in Ottawa, the nation's capital, and which would bring together Portuguese community leaders from around the country. The many recommendations made at the inaugural meeting included the following related to citizenship : « people need to be encouraged to become Canadian citizens and to vote » and there was a need to « encourage clubs and associations to offer workshops on citizenship » (Conference Report 1995 : 31).

Federal Canadian norms regarding multiculturalism and citizenship were embodied in a government ministry of the same name, and backed by the availability of government funding. Through these mechanisms, Canadian norms regarding citizenship were bolstered at the community level both through agenda-setting activities on the part of civil servants in the federal government, and through the provision of real financial support to make such priorities realizable. Portuguese community leaders were not adverse to forming a pan-Canadian group, nor to citizenship promotion, but they needed a top-down process of incentives and advocacy before acting. Through these sorts of mechanisms, we can see how States' symbolic goals can be translated into mechanisms of action.

Looking at the configuration of non-profit organizations working with the Portuguese community in Boston, one is struck by the general lack of links between organizations and government, especially at the federal level. The most visible community organization, MAPS, receives grants from the Massachusetts government, but these are all earmarked to specific social programs¹⁴. The only government office that is trying to do significant

^{14.} Of interest is the fact that most of these programs are related to health and social-services. In Canada, such services would be much more likely to be administered by government agencies, or through the government funded health care system. The benefit of contracting such services out as is being done in Boston is that services can be specifically focused for the Portuguese community. The negative consequence might be that since non-profit organizations are required to do many things that the American State does not want to,

outreach with migrant populations, the Office for Refugees and Immigrants, is a Massachusetts agency, and it is mostly concerned with refugee settlement. There is no organization corresponding to the Toronto PIN, which has as its main goal the coordination of activities across the Portuguese community and its organizations. PIN is funded through provincial and federal grants targeted to aiding ethnic communities in a broad manner; there are no similar funding opportunities in the US, resulting in the absence of a Portuguese umbrella organization. In the American case, private foundations mostly take up the role of handing out block grants.

The consequences of this different organizational configuration in Massachusetts is two-fold. First, there is no over-arching government department that attempts to set a normative goal of citizenship acquisition and then promote this goal. While the INS is the federal agency in charge of naturalization, most Boston-area groups only receive government funding from the State of Massachusetts, a political unit with no jurisdiction over citizenship. Second, since the US is a much less interventionist polity, there is much less public money available for the type of organizational grants necessary to start coalition movements such as the Portuguese National Congress, or a general citizenship campaign. Money must therefore be raised by applying to specific social-service grants, through donations at the community level, or through appeals to private foundations. Specific grants prevent the development of new goals not tied to the Massachusetts government's specific agenda, while a reliance on community and foundation money results in reactive community organizing. Those who therefore want to engage in proactive work within the Portuguese community - for example, the woman who launched the Citizenship 2000 campaign in the spring of 1998 – must do so from the ground-up. While there are likely many benefits to be had from a bottom-up mobilization process as evidenced in Massachusetts, naturalization statistics imply that such a process is much less likely to result in naturalization acquisition among Portuguese immigrants, as compared to the top-down process seen in Ontario.

* * *

Naturalization data from Ontario and Massachusetts clearly show that there is a large citizenship gap between Portuguese immigrants living in Canada as compared to those residing in the United States. As I attempted to show in this paper, taking into account citizenship regulations and individual characteristics do not explain the Canada-US gap in naturalization patterns for Portuguese immigrants. I thus contend that scholars must be more sensitive to the effects of State influences on the experiences of immigrants. As Reitz (1998) implies for economic incorporation, and I demonstrate in the case of naturalization, an immigrant's destination

there is much less time, organizational energy and resources to put into other issues such as citizenship.

country can play a critical role in shaping the settlement experience. For the individual Portuguese immigrant, it does matter whether he or she moves to Canada or the US when it comes to naturalization. Consequently, it would seem important for scholars to further study the effects that the destination country has on the experiences of Portuguese migrants around the world.

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