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## Citizenship tests in five Countries: An expression of political liberalism?

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Ines Michalowski

## **Citizenship Tests in Five Countries – An Expression of Political Liberalism?**

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## **Abstract**

Engaging discussions on civic integration for immigrants, this comparison systematically analysis citizenship tests in the US, Austria, the UK, Germany, and the Netherlands. A central question discussed is whether these tests can be interpreted as assimilation, repressive liberalism or as a neutral instrument that changes its function according to the surrounding citizenship regime as some authors argue. The analysis has the surprising result that none of the hypotheses from the existing literature on civic integration can explain the content of all five citizenship tests. In particular I find that the characteristics of the surrounding citizenship regime are not a good predictor for the content of the respective citizenship tests: countries with rather restrictive citizenship regimes such as Austria or Germany have opted for a citizenship test with a liberal content that is comparable not only to the British but also to the US-American test. On the other hand the content of the Dutch citizenship test does not fully correspond to a Rawlsian definition of political liberalism although the Dutch citizenship regime is relatively open. Therefore I conclude that the formal character of a citizenship regime is only loosely connected with the national definition of citizenship as it is conveyed by the content of citizenship tests. It is not because civic integration requirements are obligatory and restrict the free will of future citizens that citizenship itself is defined in illiberal terms.

**Keywords:** Citizenship test, naturalization, civic integration, USA, Austria, Netherlands, UK, Germany

## Zusammenfassung

Als Beitrag zu der Debatte über Integrationsanforderungen für Zuwanderer vergleicht diese Studie systematisch den Inhalt von Einbürgerungstests der USA, Österreichs, des Vereinigten Königreichs, Deutschlands und der Niederlande. Eine zentrale Frage ist, ob die Tests als Assimilation, repressiver Liberalismus oder neutrales Instrument, dessen Funktion erst durch den Charakter des jeweiligen Staatsangehörigkeitsregimes bestimmt wird, verstanden werden können. Überraschenderweise zeigt die Studie, dass keine der in der Literatur vertretenen Hypothesen den Inhalt aller fünf Einbürgerungstests erklären kann. Insbesondere wird deutlich, dass Länder mit einem eher restriktiven Staatsangehörigkeitsrecht wie Österreich und Deutschland Einbürgerungstests mit einem liberalen Inhalt eingeführt haben, der nicht nur dem britischen, sondern auch dem amerikanischen Test ähnelt. Andererseits entspricht der Inhalt des niederländischen Tests nicht vollständig einer Rawlsischen Definition des politischen Liberalismus, obwohl das niederländische Staatsangehörigkeitsrecht relativ offen ist. Deshalb komme ich zu der Schlussfolgerung, dass der formale Charakter eines Staatsangehörigkeitsregimes nur lose mit dem jeweiligen nationalen Verständnis von Bürgerschaft verbunden ist, wie es durch den Inhalt der Einbürgerungstests zum Ausdruck gebracht wird. Der obligatorische Charakter von Integrationsanforderungen, der den freien Willen zukünftiger Bürger einschränkt, besagt nicht, dass Bürgerschaft in illiberalen Termini definiert wird.

**Schlagwörter:** Einbürgerungstests, Einbürgerung, Integrationsanforderungen, USA, Österreich, Niederlande, Vereinigtes Königreich, Deutschland

## Table of Contents

Introduction .....	4
Existing studies .....	4
Method .....	7
Citizenship tests – an overview .....	11
Results of the content analysis.....	14
Discussion of results .....	22
Conclusion: Political liberalism in restrictive citizenship regimes?.....	24
Bibliography .....	27
Appendix: .....	29

## Introduction

Citizenship tests for immigrants who want to acquire the nationality of the country in which they live have a fairly long tradition in the USA but are a rather recent development in Austria, Germany, the UK and the Netherlands. In Europe, the emergence of these tests is part of a broader development which started at the turn of the last century and increasingly linked policies for the integration of immigrants in North Western Europe with integration requirements and sanctions from immigration law. This is why in many European countries today integration requirements are not only formulated in case an immigrant wants to acquire citizenship, but they are also relevant for permanent residence or family reunification. This increase and formalization of obligatory integration requirements has been hotly debated in the scholarly literature. The core of the debates revolved around the question how this change in national citizenship regimes and immigration policies can be explained and classified and if the emergence of such requirements throughout Europe means a “return of assimilation” as Rogers Brubaker (2003) phrased it. Citizenship tests in Europe are hotly debated to decide whether they are an element of an assimilatory policy, an illiberal practice or a more complex phenomenon that does not allow for a simple evaluation. Citizenship tests are difficult to compare and evaluate since their content has not been internationally standardized as language requirements have been through the Common European Reference Framework for Languages. This is why particularly striking questions are frequently singled out and presented as if they were representative of the entire test. The objective of this analysis is to systematically compare the content of citizenship tests in five countries and to contribute to the debate about how to interpret these tests: Do they represent an illiberal means to pursue liberal goals, a return of assimilation or a political tool that can have divergent functions?

## Existing studies

Along with the ever growing general literature on citizenship (Brubaker, 1992; Soysal, 1994; Schnapper, 1994; Kastoryano, 1996; Hansen/ Weil, 2001; Hagedorn, 2001; Koopmans et al., 2005; Bauböck/ Ersbøll/ Groenendijk/ Waldrauch, 2006; Thränhardt, 2008; Helbling, 2008; Howard, 2009), recent years have seen an important increase in studies that focus on integration requirements inter alia for naturalization (van Oers, 2006; De Hart/ van Oers, 2006: 322-327; Michalowski, 2007; Joppke, 2007; Bader, 2007; Scholten, 2007; Spijkerboer, 2007; Jacobs/ Rea, 2007; Peucker, 2008; White, 2008; Ersbøll/ Kostakopoulou/ van Oers, 2010 forthcoming). Among these studies, three different theoretic approaches that contradict each other on the interpretation of the nature of citizenship tests can be identified.

Christian Joppke (2007), who felt challenged by increasing integration requirements in his earlier formulated theory of European citizenship regimes converging towards political liberalism (Joppke/ Morawska, 2003) significantly contributed to this discussion. He stressed that what – following Han Entzinger’s (2003) translation of the Dutch notion of *inburgering* – is now known under the generic term of “civic integration” represents the pursuit of “liberal goals with illiberal means”. In a complex analysis Joppke (2007: 3) also states that “Europe is becoming like America in that, much as Rawls’ ‘political liberalism’ has formulated it, the integration of society can only occur in terms of a procedural consensus on what is ‘right’, not in terms of a substantive consensus on what is ‘good’.” This means that according to Rawls’ definition of political liberalism a societal consensus can only be based on political and juridical principles but not on moral ones (Rawls, 1993: 149-150 and 158-168). At the same time, while referring to examples of US-American “workfare” policies whose logic in times of shrinking welfare states is largely comparable to civic integration policies for immigrants (Bommes, 2006: 64; Brubaker, 2003; Entzinger, 1994), Joppke coined civic integration as “an instance of repressive liberalism.” This is to say that even though the final objective of these measures and requirements is to contribute to the establishment and defense of politically liberal democratic ideas, the fashion in which this is done can be repressive. Joppke (2007: 14) insists on civic integration being an expression of liberalism, not assimilation. Thus, according to Joppke, citizenship tests are illiberal merely in their format since (they are obligatory) but they pursue liberal goals which for our analysis means that the content of citizenship tests should correspond to a Rawlsian definition of political liberalism.

This assumption can be opposed to the thesis of several scholars, particularly Dutch ones, who defend the idea that the increase in integration requirements can be interpreted as a turn towards assimilation (Bader, 2007: 56; Scholten, 2007: 203-249). In an essayistic analysis of Dutch integration policy and the position of Dutch political parties on civic integration (*inburgering*) Thomas Spijkerboer (2007: 49-51) argues that these integration requirements are a form of assimilation because they are based on a thick public moral that the immigrant is expected to share. Spijkerboer specifies that the public moral he observes in Dutch integration policies is related in particular to sexuality: “Equality between men and women is mentioned over and over again, the liberating sexual moral demonstrated by nudist beaches and same-sex-marriages, shaking hands” (Spijkerboer, 2007: 65, author’s translation). According to this assimilationist-hypothesis, the content of citizenship tests cannot be subsumed under a Rawlsian definition of political liberalism as a “procedural consensus on what is right” (Joppke, 2007: 3) but under a more substantial or “thick” definition of what is good.

A third hypothesis by Mario Peucker (2008) defies both previous ones arguing that citizenship tests per se are neither assimilationist nor liberal. Peucker calls them an “abstract tool” in the sense that their function diverges according to the restrictive or open character of the citizenship regime in which they are embed-

ded. Therefore no general statement can be made if they aim at the assimilation of immigrants or pursue liberal goals. According to Peucker (2008: 241), the role citizenship tests play in a citizenship regime is largely determined by the respective national context which he describes as the naturalization procedure as well as public debates that have led to the introduction of citizenship tests.

The gaps in the literature are twofold: existing studies are either unspecific and address citizenship tests together with other integration requirements (Spijkerboer, 2007; Joppke, 2007) or they focus on the function of citizenship tests and the message that they convey but pay very little attention to the content of these tests (Peucker, 2008). Quick content summaries such as “the Life in the UK test and the Dutch “societal orientation” test [...] bear strong resemblances: the questions cover similar topics ranging from politics (e.g. government, constitution) to employment and other everyday life issues (e.g. transport, housing)” (Peucker, 2008: 254) are not exhaustive and do not allow for any statement about the relevance of one topic in comparison to another. One study of the Austrian (federal and state level) citizenship test (Perchinig, 2009 forthcoming) does analyze the content of the test in a systematic way by attributing every question to one out of nine thematic categories. The shortcoming of this Austrian study, however, is that it does not compare countries and only applies a one-dimensional and purely thematic classification.

This study tries to close these gaps in two ways: First of all it systematically analyses the content of citizenship tests by way of a two-dimensional set of indicators of which only the first one is thematic. The second set of indicators relates to Christian Joppke’s (2007) paraphrasing of Rawls’ thesis on political liberalism. This means that each question is either classified as a question about the knowledge of facts and about what is right or as a question about behavior and morals along the lines of “what is good”. Thus, in this contribution, citizenship tests are defined as liberal in the Rawlsian sense:

- A) if questions on subjects that refer to the “overlapping consensus” (the basic rights & freedoms and the political system that is supposed to guarantee these rights & freedoms) form the biggest thematic sub-category within each test and
- B) if they only ask questions about facts and the knowledge of “What is right”.

The second contribution to the existing literature that this study seeks to make is to compare the thematic content of citizenship tests in five countries, which to our knowledge has not been done so far. The countries selected for this comparison are four European Member States and the US. The US has been integrated into this comparison because it is Joppke’s (2007:3) point of reference for a country with a liberal citizenship regime. In addition, four of the eight European Member States (cp. table 6 below) that dispose of a full-fledged written citizenship test



have been selected: one with an open citizenship regime (UK, classified by the Migrant Integration Policy Index MIPEX 2006 with a score of 62<sup>1</sup>), one with a restrictive citizenship regime (Austria, MIPEX 2006 score 22), one with a rather open citizenship regime (the Netherlands, MIPEX 2006 score 51), and one with a rather closed citizenship regime (Germany, MIPEX 2006 score 38).

Based on the theoretical discussions presented above about how citizenship tests can be interpreted, we formulate three hypotheses:

- H1: If civic integration requirements represent the pursuit of liberal goals with illiberal means and if Europe is becoming more like America in the sense that citizenship regimes converge towards liberalism (Joppke, 2007) we expect all five citizenship tests compared here to be liberal in the Rawlsian sense.
- H2: If civic integration requirements make use of a “thick” understanding of public moral as Thomas Spijkerboer (2007) suggests for the Netherlands, we expect the content of citizenship test not to be liberal in the Rawlsian sense.
- H3: If citizenship tests are an abstract tool, determined by the national context for the acquisition of citizenship as Peucker (2008: 241) argues, we expect countries with an open citizenship regime (US, UK) to have a citizenship test that is liberal in the Rawlsian sense, countries with a restrictive citizenship regime (Austria) to have a citizenship test that is illiberal in the Rawlsian sense and countries with an intermediate citizenship regime (Netherlands, Germany) to have a citizenship test that is rather liberal (Netherlands) or rather illiberal (Germany) in the Rawlsian sense.

## Method

The method used for analyzing the five citizenship tests is a content analysis operating with fourteen thematic subcategories that can be regrouped into three overall thematic categories. The purpose of the overall thematic categories is to raise the level of abstraction while the thematic subcategories have been added to allow for a more detailed analysis of specific issues dealt with in the citizenship tests. The three overall thematic categories are “politics, history and geography”, “the economy and the provision of public goods & services”, as well as “traditions and public moral”. Among the 14 thematic subcategories are categories such as ‘lifestyles’, ‘work and self-employment’, ‘health’, ‘education’, ‘political system, democracy & rights’, and ‘history, geography & national symbols’. A category of “other” has been added to both, the overall thematic categories and the thematic

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<sup>1</sup> The MIPEX rankings for access to nationality range from 22 points (Austria) to 71 points (Sweden), see [www.integrationindex.eu](http://www.integrationindex.eu)

subcategories, to regroup a minority of questions that could not be classified along the existing categories.

The overall thematic categories as well as the thematic subcategories were gained inductively. While the coding of the first sets of citizenship test questions still led to important changes of the overall thematic categories and the subcategories such changes became unnecessary when the last sets of questions were coded. Once the coding system was stabilized, the test questions and the coding system were checked for reliability.<sup>2</sup> The following tables 2 to 5 show typical questions from the three overall thematic categories and the category “other”, divided up into the fourteen respective thematic subcategories.

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

1) political system, democracy, rights	<p>What type of constitution does the UK have?</p> <p>What are the two major political parties in the United States?</p> <p>What is the function of elections in a democracy?</p> <p>When did women receive the right to vote?</p> <p>What are the minimum ages for buying alcohol and tobacco?</p>
2) history, geography, national symbols	<p>When were the Nazi and Adolf Hitler at power in Germany?</p> <p>Which form of government did Austria have until 1918?</p> <p>What ocean is on the East Coast of the United States?</p> <p>Where are Geordie, Cockney and Scouse dialects spoken?</p> <p>What are the colors of the Austrian flag?</p>
3) Church & state freedom of religion	<p>What is freedom of religion?</p> <p>What is the Church of England and who is its head?</p> <p>The candidate knows that state law is above religious and traditional law.</p>
4) administrations & formalities	<p>Where do you have to register when you move within Germany?</p> <p>The candidate knows the procedures to request and renew a driver's license</p>
5) lifestyles (referring to laws)	<p>Who is not allowed to live together as a couple in Germany?</p> <p>Are honor killings forbidden and subject to prosecution in Austria?</p> <p>The candidate knows that open homosexuality is not forbidden by law.<sup>3</sup></p>

<sup>2</sup> The coding scheme and classification rules were refined after a first round of feedback and then given out to others a second time. See the annex for a full list of the thematic categories and the thematic sub-categories as well as for a description of how these categories have been defined.

<sup>3</sup> In this analysis, questions about homosexuality are included in the “lifestyle”-category. This, however, is not to suggest that homosexuality is nothing but an individual choice as some opponents of gay rights argue.

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

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

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

11) lifestyles (referring to social norms)	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.
12) traditions, cultural specificities of the host country	What is an Easter tradition in Germany? The candidate is familiar with the most relevant Dutch public holidays and their religious or historic meaning.
13) how-to guide on etiquette	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.

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

14) other	Which organizations can people rent houses from? In Germany, many people work as volunteers during their free time. What does this mean? What services are offered by vets?
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In addition every item has been classified according to its orientation towards (1) factual knowledge and/or knowledge of what is right or towards (2) knowledge of “what is good” in the sense of opinions, social norms, and moral (see table 6).

**Table 5: Typical Questions on What is Right or on What is Good**

	Right	Good
Gets informed about unwritten rules (through observation, asking for advice, asking for support or correction etc.)		x
Who can ask for a divorce in Germany? a) only the husband, b) the wife's parents, c) only the wife, d) the wife and the husband	x	
Interacts with colleagues and superiors in an adequate way		x
Deals with agreement and disagreement in a socially accepted manner		x
What is a German law? a) You must not smoke on the street, b) women must wear skirts, c) you must not hit children, d) women must not drink alcohol	x	

Before the sets of indicators detailed in tables 2-6 could be applied, the items had to be constructed. This was relatively obvious for those citizenship tests with all questions (and answers) published: each of the 100 US questions and answers, each of the 90 federal Austrian questions and each of the 300 federal German questions with its respective 4 multiple choice answers has been defined as an item.<sup>4</sup> In the UK where the real questions are kept secret but a set of 97 sample questions that can be used for an auto-evaluation (am I ready for the test?) is published, these sample questions have been defined as the items to be categorized. Since the Dutch test questions are not published and sample questions do not exist<sup>5</sup>, the items to be coded were derived from the curriculum for the test which includes a summary of all relevant knowledge in form of a list of 310 bullet-points. Every bullet-point has been treated as one question.<sup>6</sup> By developing the set of thematic categories and sub-categories and defining the items to be categorized, this method of standardized content analysis allows for a systematic comparison of the content of citizenship tests across Europe and the US. In a next step the citizenship tests to be analyzed will be presented in more detail.

<sup>4</sup> In the German case, the item has been constructed by only looking at the question and the one right answer, discarding the three wrong answers.

<sup>5</sup> Unfortunately, it was not possible to obtain the real test questions. This is regrettable from a methodological perspective since the exact wording of the questions would have allowed for a more accurate analysis in particular with regard to the classification of items as "good" versus "right."

<sup>6</sup> Cross-headings that figured in the bullet-point list were left out. For the Dutch curriculum for the citizenship test see Eindtermen Kennis van de Nederlandse Samenleving, Bijlage 5 bij artikel 2.5 van de Regeling van de Minister voor Vreemdelingenzaken en Integratie van 6 december 2006, nr. 5456790/06, tot uitvoering van de Wet inburgering, het Besluit inburgering en tot wijziging van de Regeling verstrekkingen asielzoekers en andere categorieën vreemdelingen 2005.

## Citizenship tests – an overview

Before they grant citizenship to a foreign national, the states compared in this paper have a series of requirements that a candidate for naturalization has to fulfill. Besides requirements such as residence, absence of a judicial record, language skills and/or income, several countries also require candidates for naturalization to pass a citizenship test. As shown in table 1, eleven countries in the EU 25<sup>7</sup> administer such a citizenship test. The table also shows that countries with restrictive citizenship regimes are more likely to have a citizenship test, a finding that rather contradicts Peucker's (2008) observation that not only countries with more open but also countries with more restrictive citizenship regimes introduce citizenship tests. MIPEX 2006 indeed shows that among the EU 25 the UK is the only country with an open citizenship regime that has a citizenship test.

**Table 6: Citizenship regimes and citizenship tests in the EU 25**

Citizenship law	Test	No Test
<b>Open</b>	UK	Belgium, Ireland, Portugal, Sweden
<b>Intermediary</b>	Netherlands <i>Oral: Spain</i>	Czech Republic, Finland, Poland, Slovakia, Slovenia, France
<b>Restrictive</b>	Austria, Denmark, Estonia, Germany, Latvia, Lithuania <i>Oral: Greece, Hungary</i>	Cyprus, Italy, Luxemburg, Malta

*Data Source:* MIPEX 2006<sup>8</sup> (own calculations excluding the scores for citizenship tests<sup>9</sup> and corrected for the information on France and the UK classified by MIPEX as having an oral test.<sup>10</sup>)

<sup>7</sup> The data source (MIPEX 2006) only includes the EU 25.

<sup>8</sup> It should be mentioned that although MIPEX 2006 classification of countries as either restrictive, open or falling into an intermediary category slightly diverges from other indices such as the Citizenship Policy Index (Howard, 2009) and the Contested Citizenship-Index (Koopmans et al., 2005) all three indices agree that Austria represents a restrictive and the UK an open citizenship regime. In addition, CPI and MIPEX agree that the Netherlands belongs to the intermediary category while the CCI classifies the Dutch citizenship regime as open. Furthermore, CPI and CCI place Germany in the intermediary category while MIPEX depicts Germany as a fully restrictive regime. This is inter alia due to the fact that MIPEX gives the worst score (1) to Germany on the indicator "dual nationality for children" while the UK receives the best score (3). Since the indicator is phrased in terms of dual nationality for children, not in terms of facilitated access to nationality for children born in the country, MIPEX completely ignores the fact that Germany and the UK are, according to Waldrauch (2006: 127 and 129) the two only EU-15 countries with *ex lege regulations* for the attribution of citizenship to children born to foreigners.

<sup>9</sup> The indicators chosen from MIPEX for this table are: Waiting period for first generation immigrants, Economic resources requirement, Criminal record requirement, Costs of application and/or issue of nationality title, Grounds for refusing or withdrawing status, Requirement to renounce / lose foreign nationality upon naturalization, Dual nationality for children of third country nationals born in the country.

<sup>10</sup> A closer look at the MIPEX data shows that gathering fully reliable information for all EU 25 Member States on a broad range of indicators is a very challenging task. Thus, for example, the UK is said to have an "oral" citizenship test even though the test actually is taken on a computer and requires written language skills. Furthermore, France is scored as having an "oral citizen-

This suggests that Peucker's argument saying that citizenship tests are a neutral instrument because they exist in restrictive as well as in open citizenship regimes can only be confirmed partially. In the EU, contrary to Northern America, citizenship tests are not fully neutral: as could be seen above, countries with restrictive citizenship regimes are more likely to introduce citizenship tests while countries with open citizenship regimes are less likely to do so.

Among the countries that have introduced citizenship tests, these tests vary as shown in table 7 for the countries compared in this study. As already mentioned in the methodology section, the US, Austria, and Germany have published their test questions and even the right (US) or possible (Germany) answers or at least refer the candidate to a study book where the right answer can be looked up (Austria). On the contrary the Netherlands has decided to keep questions and answers secret<sup>11</sup> while the UK which also keeps the real questions secret has published a series of sample question allowing the candidate to auto-evaluate whether he or she is ready for the test.

Apparently all countries – except for the US where the exam is administered orally – have opted for a multiple choice test. The number of questions varies considerably since in some countries such as the US, Austria and the UK, the maximum number of questions that a candidate for naturalization should be familiar with is limited to roughly 100 while at least in Germany this number goes up to 310 questions. No country asks all questions but randomly selects between 10 and 33 questions. As to the number of questions that have to be answered successfully in order to pass the test, it should be mentioned that only the US, Austria and Germany clearly say how many right answers are needed. The time given to answer the questions varies as well and is relatively long in Austria where 18 questions have to be answered in 2 hours time. What table 7 further shows is that the European citizenship tests are all very recent while the US citizenship test has existed for over two decades. The costs for the citizenship test and/or the naturalization procedure vary considerably among the countries and are the lowest in Germany, moderate in the Netherlands and the US and comparably high in Austria and the UK.

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ship" test even though as of August 2009, there is still no ministerial instruction that actually puts such a citizenship test into place. The main existence of the French test is on paper (information confirmed by the Sous Direction de l'accès à la nationalité française in Rezé).

<sup>11</sup> Only a few selected sample questions are accessible on the website: [www.inburgeren.nl](http://www.inburgeren.nl). However, according to the ministry currently in charge of integration affairs (Ministry of housing, spatial planning and the environment) some sample questions will soon be published.

**Table 7: Overview characteristics citizenship tests**

		US	Austria	Germany	Netherlands	UK
1)	Questions published?	Yes	Yes	Yes	No	Not fully <sup>12</sup>
2)	Answers published?	Yes	Yes, but the answers are to be found in an explanatory text called scriptum	Yes	No	Study book
3)	Multiple choice?	No (oral test)	Yes	Yes	Yes	Yes
4)	How many questions in total?	100	90 + state questions <sup>13</sup>	300 + 10 per state	310 items in curriculum	97 sample questions
5)	How many questions asked?	10	18	33	not published <sup>14</sup>	24
6)	How many successful answers needed?	6	9 or 12 <sup>15</sup>	17	not published <sup>16</sup>	?
7)	How much time is given?	Oral exam	120 minutes	60 minutes	60 minutes	45 minutes
8)	Year of creation of the test	Late 1980s	2006	2008	2003	2006
9)	Naturalization costs (including costs for the test)	\$ 675	€ 900	€ 255	€ 610 (€ 380 + € 230 for the test)	£ 655

From the table it can be summarized that the ways in which naturalization tests are organized is more transparent in the US, Austria, Germany and, to some extent the UK, than in the Netherlands.

<sup>12</sup> Life in the UK-questions derived from the UK Home Office, Border Agency's official website "What you need to know" ([www.lifeintheuktest.gov.uk/htmlsite/self\\_10.html](http://www.lifeintheuktest.gov.uk/htmlsite/self_10.html)) which lists 97 bullet points with questions.

<sup>13</sup> The number of these questions varies per state. In Tirol, for example, the candidate for naturalization has to learn another 83 state-related questions, in Salzburg only 52.

<sup>14</sup> Dutch citizenship law contains a very special regulation: besides a language test and the actual citizenship test candidates for naturalization also have to pass an electronic practice exam and gather a total of 30 certificates from different institutions (administration, school, bank, etc.) testifying that the candidate for naturalization has been capable of managing the respective situations.

<sup>15</sup> The candidate for Austrian citizenship receives 6 questions on politics and democracy in Austria, 6 questions on Austrian history and 6 questions on the respective state where he or she lives. The candidate either needs 3 correct answers in each of the three sections (thus 9 correct answers in total) or 12 correct answers in total. Hence, at least in theory it would be possible to pass the Austrian citizenship test without having even one correct answer from the state-specific questions.

<sup>16</sup> Mario Peucker (2008: 248-249) mentions that the pass mark for the Dutch citizenship test is 70%. However, the regulation for the integration exam (article 9.3, p.12) mentions that the minister decides on the pass mark and that the pass mark is not to be published by the IB-group administrating the test ([www.inburgeren.nl/Images/10050-04%20Reglement\\_tcm12-15786.pdf](http://www.inburgeren.nl/Images/10050-04%20Reglement_tcm12-15786.pdf)).

## Results of the content analysis

As described in the methodology section, the content of the citizenship tests compared here has been classified with regard to two aspects: the themes that are touched upon and the way they are dealt with (i.e. do the test questions only refer to factual knowledge and rights or also to the knowledge of certain social norms). The first part of the content analysis attributed each coded item to one of the three overall categories which are: 1) Politics, History, and Geography, 2) The Economy and the Provision of Public Goods & Services, and 3) Traditions and Public Moral.

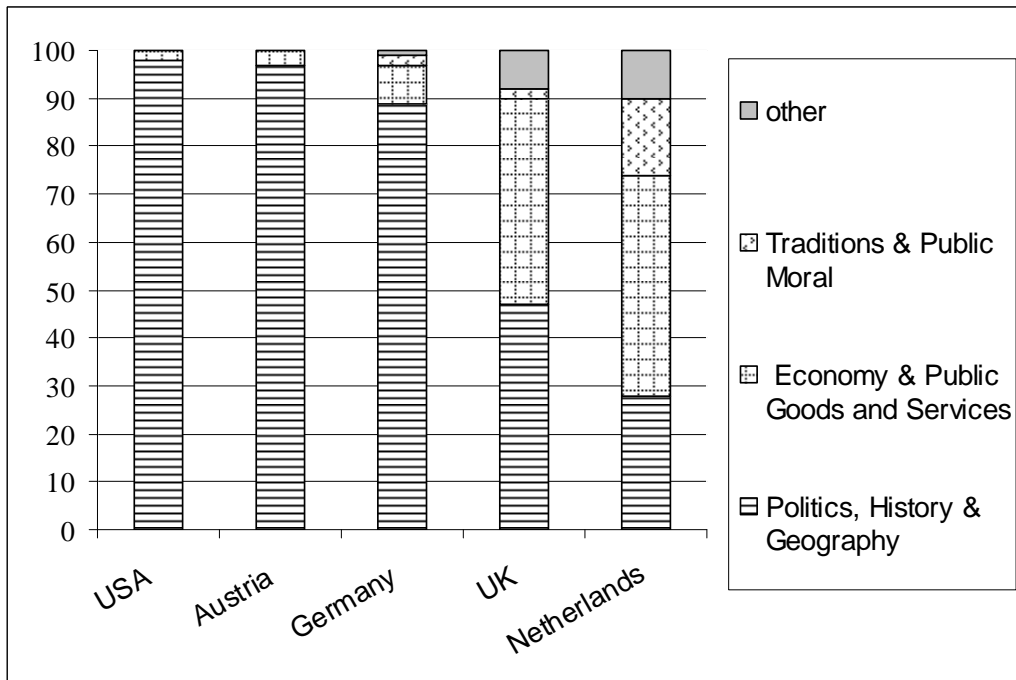
The analysis showed (see table 8 below) a remarkable similarity between the US-American and the Austrian citizenship test since both countries almost exclusively pose questions on democracy, politics, history & geography.<sup>17</sup> There is also a large similarity with the new German citizenship test which for almost 90% asks questions related to this field. While in the US and Austria the only questions which do not relate to democracy, politics, history & geography relate to the economy and the provision of public goods and services, Germany also asks a few isolated questions about traditions and public moral as well as about other issues that cannot be attributed to any of the three major categories. Although it should be underlined that the overall picture is one of convergence and minor differences between the 5 countries compared here, it can be observed that the Netherlands and the UK follow a slightly different approach than the three other countries: in the UK only 47 % of all (sample) questions relate to politics, history & geography while another 43% of the questions deal with the economy and the provision of public goods & services. As in Germany, there are some isolated questions related to traditions and public moral while the category of questions which could not be coded along one of the three categories was bigger (8%) than in the US, Austria or Germany. In the Netherlands, the picture is still more colorful and even fewer questions (28%) are related to politics, history & geography while another 46% are related to the economy and the provision of public goods & services. The Netherlands also puts a slightly stronger emphasis on traditions and public moral for the acquisition of citizenship (16%).

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<sup>17</sup> Our finding thereby confirms Perchinig's (2009, forthcoming) finding that over 90% of the questions from the federal Austrian citizenship test refer to political institutions, the political process, international relations, economic and geographical facts, history, as well as state symbols.



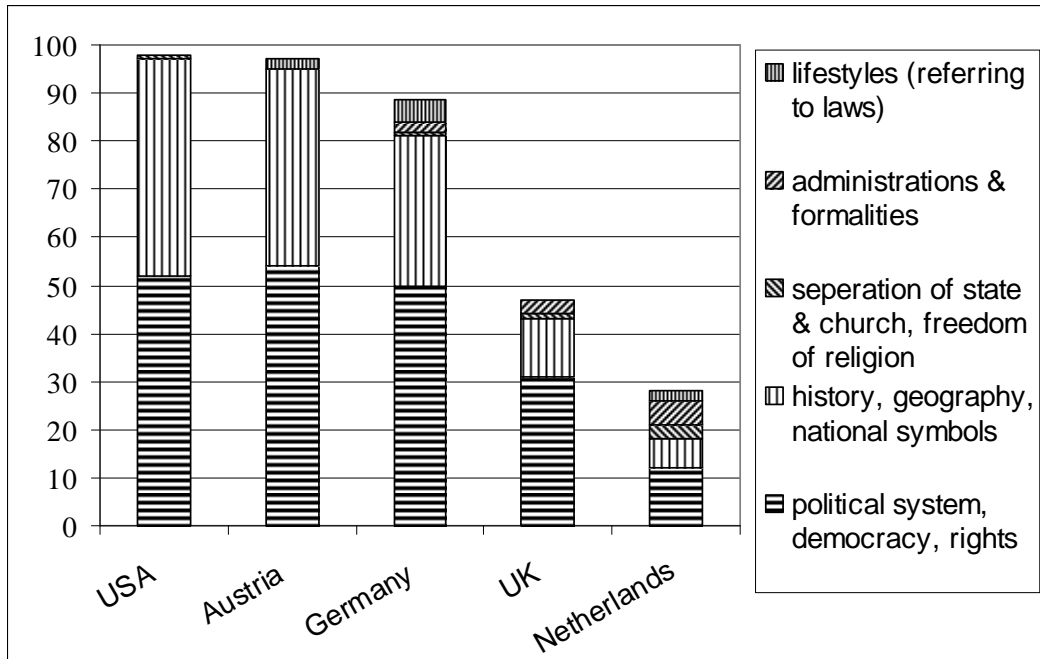
**Table 8: Content of citizenship tests in selected countries per overall categories**



Thus the classification along the overall categories shows that in all five countries questions on politics, history, and geography as well as on the economy and the provision of public goods and services make up for at least three-quarter of all questions that a candidate for naturalization has to learn to acquire citizenship. On the other hand, questions about traditions and public moral are only a minority. Even in the Netherlands where questions on traditions and public moral play a slightly bigger role, it can be assumed that the citizenship test can be passed even if all answers to questions related to this topic were wrong.

Let us now turn toward a more detailed analysis of the sub-themes to render more precise the previous analysis of the citizenship tests along the overall thematic categories. As can be seen in table 4, the more detailed thematic coding within the overall category “Politics, History & Geography” shows some interesting similarities especially between the US, Austria and Germany.

**Table 9: Themes within category “Politics, History & Geography” (as % of all questions)**



On the one hand this table only confirms the previous finding that the US citizenship test concentrates almost totally on questions related either to the political system, democracy, and rights or to questions about US history, geography, and national symbols. A very similar pattern can be observed for Austria and also for Germany. This shows that the primary objective of the citizenship tests in these countries is to teach the candidate for naturalization how democracy works in the respective political system and which rights and obligations citizens have in these countries. These themes also play an important role in the British citizenship test but a somewhat smaller role in the Dutch one. All countries except for Austria also ask at least one question about the separation of state and church and/or the freedom of religion. In addition, there are some questions related to administrative steps and formalities in the German, the British and the Dutch citizenship test.

One interesting thematic sub-category are questions related to lifestyles which are split up in this system of categorization among the overall category Politics, History, and Geography if they relate to legal norms (see table 9) and the overall category Traditions and Public Moral if they relate to social norms (see table 10). Lifestyle questions are not asked at all in the US-American test, but do make a (limited) appearance in the European tests compared here: The UK asks one, Austria two questions<sup>18</sup>, 5% of all questions in Germany and 7% of all questions

<sup>18</sup> The UK question is whether many children live in single parent families or step-families while Austria asks one question about the legitimacy of forced marriages and one about the legitimacy of honor killings.

in the Netherlands relate to this topic. A comparison of Germany and the Netherlands on this indicator further reveals that the German federal citizenship test relates all lifestyle questions to the legal situation in Germany (“What is allowed under German law?”). Hence, the German federal citizenship test for example includes the questions: who is allowed to ask for marriage or divorce, who is in charge of the education of children and who is not allowed to live together as a couple under German law?<sup>19</sup> Candidates for naturalization are also supposed to know that polygamy is not allowed in Germany but that it is allowed to marry a partner with another faith. Thus, except for one question which seems to be badly formulated<sup>20</sup> all questions relating to lifestyle in the federal German citizenship test refer to laws.

The Netherlands also asks questions about lifestyles and related cultural practices but contrary to Germany, only a minority of the lifestyle-items in the Dutch curriculum refers to legal issues (e.g. the candidate should know that men and women are equal before the law, that homosexuality is not forbidden by Dutch law, and that violence (including domestic violence, honor killings, physical punishment of children, and female genital mutilation) is punished). The other lifestyle-items, however, relate to social norms such as: the relationship between men and women is equal (also at home), it is accepted in the Netherlands that (unmarried) couples (also of same sex) live together, or women and girls are expected to live a (financially) independent life.<sup>21</sup>

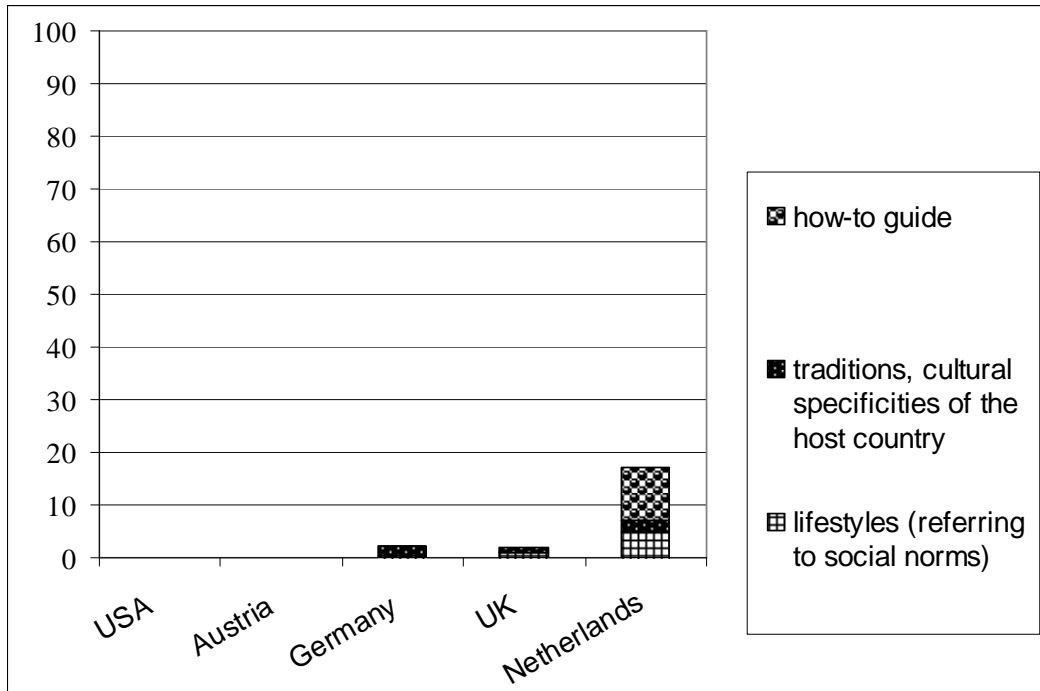
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<sup>19</sup> Possible answers to the question # 245 (author’s translation) “Who is not allowed to live together as a couple under German law” are: a) Hans (20 years) and Marie (19), b) Tom (20) and Klaus (45), c) Sofie (35) and Lisa (40) d) Anne (13) and Tim (25).

<sup>20</sup> Question # 267 is (author’s translation): A young woman in Germany, aged 22, lives together with her boyfriend. The woman’s parents do not support this because they do not like the boyfriend. What can the parents do? A) They have to accept the decision of their full-aged daughter, b) They have the right to bring their daughter back into their house, c) They can go to the police and press charges against their daughter, d) They try to find another husband for their daughter. The right answer a) deviates from the principle applied to all other test questions that always refer to a law: no law prescribes that they have to accept their daughter’s decision.

<sup>21</sup> Also, the candidate for naturalization should be aware of the fact that he is expected not to hinder spouse and children who want to work or bother homosexuals who come out openly, and know that the way in which certain women/men are dressed in public must not be misunderstood as unchaste or inviting.

**Table 10: Themes within category “Tradition and Public Moral” (as % of all questions)**



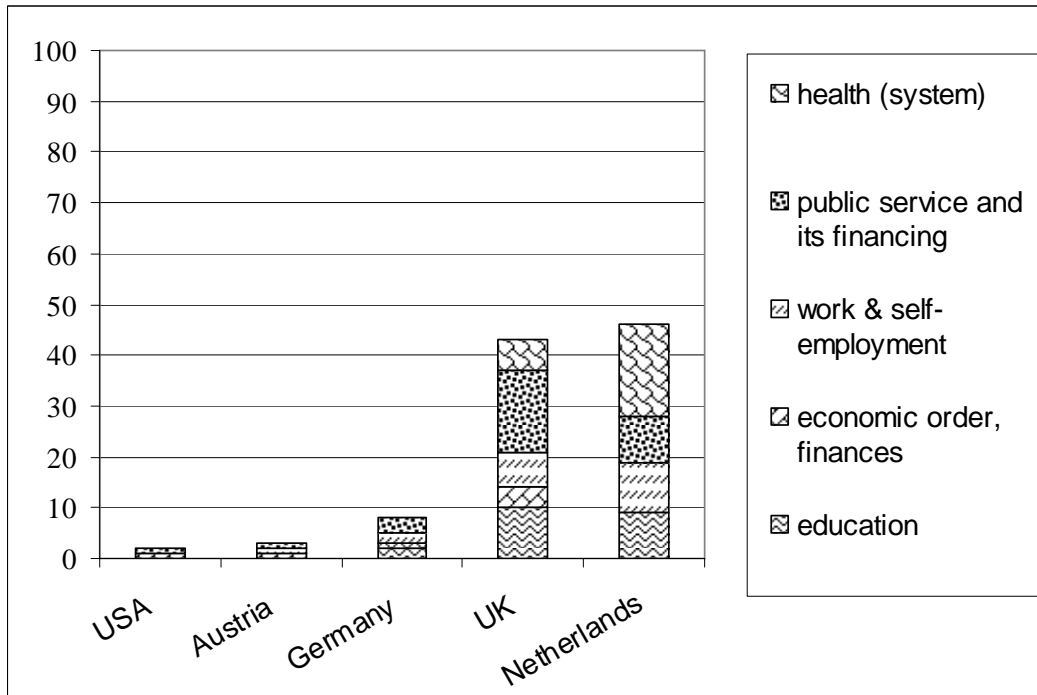
In addition, table 10 shows that 10% of the Dutch questions remind of a “how-to guide on etiquette”. Even more than the questions about lifestyles which are partially linked to the legal situation in the Netherlands, these “how-to” questions push for the acceptance of social norms. In fact, the candidate for Dutch citizenship is not only expected to cooperate with colleagues, show initiative and work independently but also to get informed about unwritten rules of politeness, not to take directly formulated criticism personally and not be offended by it. The candidate for naturalization should make appointments for meetings, stand in line when waiting, bring along a small present if suitable, inform neighbors when having a party, and keep the front yard tidy.<sup>22</sup> These how-to-guide-on-etiquette questions are specific for the Dutch test and do not appear in any of the other four citizenship tests looked at here.

As in the other countries, questions on traditions and cultural specificities of the country of immigration are almost non-existent in the Netherlands. The USA and Austria ask no questions while Germany and the UK ask a very few questions that could be ranged into this category touching on issues such as the main Christian festivals and other traditional days that are celebrated in the UK, on the traditional egg hunt on Easter in Germany or on how the four weeks before Christmas are called in Germany.

<sup>22</sup> The candidate for naturalization is also asked to give his or her own opinion but without overdoing it and the candidate should not bother others who behave in an unknown or undesired way, be it with regard to religion, lifestyles, political opinion, race, and/or gender.

One thematic category where the Dutch and the British citizenship follow a similar pattern that is clearly distinct from the one followed by the US-American, the Austrian and the German citizenship test is within the category Economy and the Provision of Public Goods and Services (see table 11).

**Table 11: Themes within category “The Economy and the Provision of Public Goods & Services (as % of all questions)”**



In the British and the Dutch citizenship test, about 10% of all questions are asked about education and the educational system. The UK also asks questions about the economic order and finances and both countries address the issue of work and self-employment. Questions about the public service and its financing include not only questions about taxes and the provision of public goods but, particularly in the Netherlands, also questions about services which are not (any more) provided for by the state but fall under individual responsibility. The thematic sub-category of health and the health system is the biggest thematic sub-category within the overall category of “The economy and the provision of public goods and services” but also the biggest thematic sub-category in the Dutch curriculum in general (18%). The theme of “health and the health system” also plays a role in the British “Life in the UK” test (6%) but is not mentioned by the German, the Austrian or the US-American citizenship test. Finally, some questions (10% in the Netherlands, 8% in the UK and 1% in Germany) could not be attributed to one of the three overall categories because they address very diverse issues ranging from renting a house to volunteering. These questions have been attributed to the category “other” (cf. table 8).

Summing up, this thematic analysis has shown that particularly in the USA, Austria and Germany, more than 80% of all questions could be attributed to only two thematic subcategories while the picture is more diverse in the case of the British and the Dutch citizenship test that both cover a broader range of topics. Let us now turn to the second analysis.

The second dimension according to which each item has been classified is not thematic. Based on Rawls' theoretical approach summarized by Joppke (2007: 3) as a distinction between a procedural and a substantive consensus, we differentiate between questions that relate to the pure knowledge of facts or to the knowledge of "What is right" and questions about "What is good."

**Table 12: Percentage of Questions on Factual Knowledge & What is Right v. What is Good**

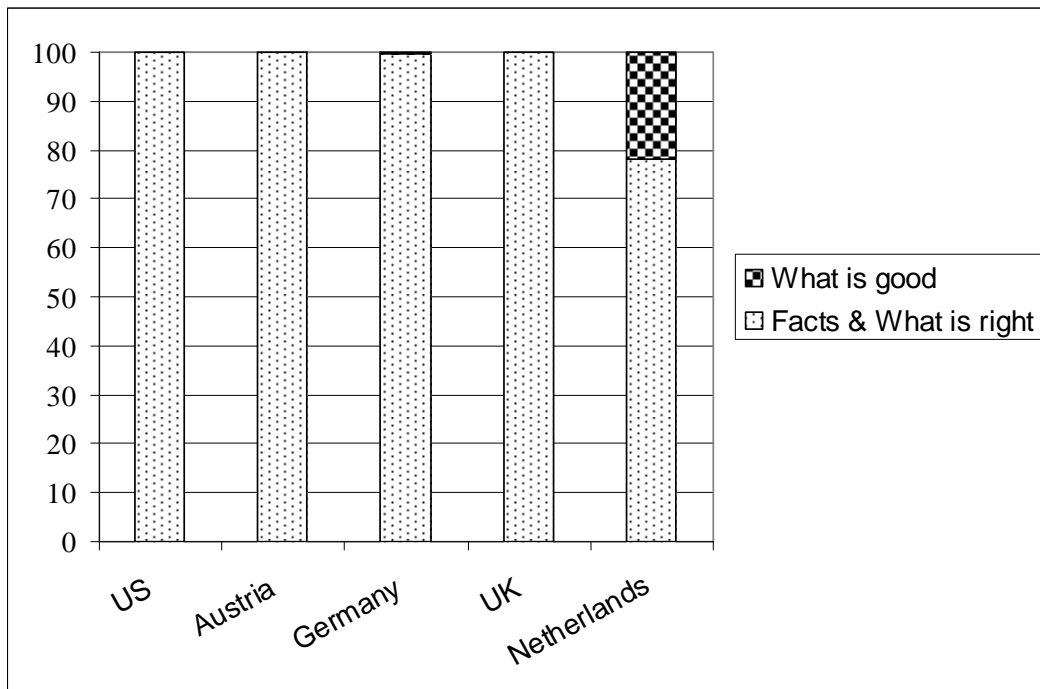


Table 12 shows a remarkable convergence between the US, Austria, Germany<sup>23</sup>, and the UK since all of these countries only ask questions about factual knowledge and the knowledge of what is right. To a large extent, this is also true for the Dutch citizenship test. However, 22% of the items in the curriculum for the Dutch citizenship test relate to "What is good." The parts of the curriculum that comprise a "how-to guide on etiquette" have been classified into this category since they refer to "adequate behavior", "unwritten rules" and social norms in a more general sense but also the lifestyle questions that refer to social norms are questions about what is deemed to be "good" in the Netherlands rather than what

<sup>23</sup> In the German test, the question # 267 is the only (probably non-intended) exception to this rule. See footnote 18 for further information.

is “right” (see table 10). In addition, several items from other thematic sub-categories such as education (recognize the value of life-long learning) or health (does sport and exercise and eats healthy to stay healthy) have been classified as “what is good.”

In sum, the results presented in tables 8-12 show that the two-dimensional analysis has had a particular analytical value. The results can be summarized as follows:

- (1) The biggest thematic sub-category in all countries except for the Netherlands is politics, rights and democracy: 52% of the questions in the US, 54% of the questions in Austria, 50% of the questions in Germany and 31% of the questions in the UK focus on this topic. In the Netherlands, however, the thematic sub-category of health (18%) is bigger than the sub-category of politics, democracy and rights (12%).
- (2) The US, Austria and the UK do not ask any question about “What is good”. Germany asks one question that can be understood as a question about “What is good” but the way in which all other 299 questions are formulated suggests that this deviant formulation was not intended. However, about one fifth of all items in the curriculum for the Dutch citizenship test relate to “What is good”.

What do these findings mean for the hypotheses formulated at the beginning of this analysis? Hypothesis H1 cannot be fully confirmed. We do see that “Europe is becoming more like America” since the citizenship tests of Austria, Germany and the UK show a puzzling similarity with the US test by focusing on politics, democracy, and rights and not asking questions about “What is good”. However, the Netherlands follow a slightly different pattern and are the only of the five countries compared here to rather confirm the second hypothesis expecting civic integration requirements to make use of a “thick” understanding of public moral. Since there is no consistent pattern among the five countries compared here, hypotheses 1 and 2 have to be rejected.<sup>24</sup> Finally, our third hypothesis stating that the meaning of citizenship tests can be predicted by the national context could not be confirmed either. Even though the US and the UK have, as expected, a liberal citizenship test Austria and Germany surprisingly also have a citizenship test with a content that is liberal in the Rawlsian sense. On the contrary, the only test that could not be classified as liberal in the Rawlsian sense is the Dutch one – a result that contradicts hypothesis 3 about the national context predicting the meaning of a citizenship test.

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<sup>24</sup> It should be underlined though that our findings for the Netherlands corroborate Thomas Spijkerboer’s (2007) findings for the Netherlands.

## Discussion of results

How can the unexpectedly liberal outcomes for Germany and Austria be explained? How can we explain that the UK devotes 43% of its questions to issues of education, economic order and finances, work and self-employment, the public service and its financing, and the health system while the three other countries with a liberal citizenship test (US, Austria, and Germany) devote not more than 8% of their questions to these issues? Does the fact that the Dutch citizenship test cannot be classified as liberal according to the definition applied in this research mean that the Netherlands are not a liberal country? What does the presence of lifestyle questions in Austria, Germany, and the Netherlands tell us?

One key to explaining the unexpectedly **liberal outcomes for Germany** certainly is the public and political debate that has been provoked by the earlier version of a non-federal citizenship test introduced in January 2006 in the state of Baden-Württemberg. This test was explicitly tailored toward (supposedly) Muslim candidates for citizenship and aimed not only at verifying their adherence to democracy and constitutional rights but also their support of more specific social norms such as the tolerance of homosexuality.<sup>25</sup> This so-called “Muslim-Test” has been criticized as discriminatory and unconstitutional. It can be assumed that the largely negative public image associated with this test was a strong motivation to protect the federal test introduced in 2008 from any similar suspicions by refraining from questions about attitudes and opinions or, to put it in other words, from “questions about what is good”. The situation in **Austria** has been different when the federal citizenship was introduced in 2006. Interestingly, the parliamentary debate about the revised nationality act from 2005 that inter alia introduced the citizenship test focused more on the new language requirements than on the citizenship test. However, in an expert hearing that was held at the beginning of the parliamentary debate, two experts criticized the content of the citizenship test as proposed by the conservative Christian Democrats. The expert for the Green party, Rainer Bauböck, suggested that questions about history, politics, and democracy were rather rare among the EU 15 countries that already disposed of citizenship tests and that it might be better to ask questions about practical aspects of Austrian institutions. A functionary from Vienna (a city with a comparatively open naturalization practice) denounced the Austrian citizenship test as being superfluous arguing that European and basic democratic values were already taught in the (obligatory) language courses and that learning the years of historic events by heart was not an indicator for successful integration.<sup>26</sup> However, while the Christian Democrats advocated for a test focusing on knowledge about Austrian history and the Social Democrats pleaded in favor of democracy-related questions, questions about attitudes and opinions were never considered

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<sup>25</sup> It might be interesting, though, that other than in the Netherlands where public support for homosexuality is particularly high, one major point of discussion in Germany was whether the non-immigrant, non-Muslim public in Germany actually supports these values.

<sup>26</sup> For the full parliamentary debate go to: [www.parlament.gv.at/PG/DE/XXII/I/I\\_01189/pmh.shtml](http://www.parlament.gv.at/PG/DE/XXII/I/I_01189/pmh.shtml) and to [www.parlament.gv.at/pd/steno/PG/DE/XXII/NRSITZ/NRSITZ\\_00129/SEITE\\_0001.html](http://www.parlament.gv.at/pd/steno/PG/DE/XXII/NRSITZ/NRSITZ_00129/SEITE_0001.html).



a political option. Instead, the questions about Austrian history were the ones discussed as “illiberal” which shows that Austrian national identity is strongly based on local history while common values such as the respect of homosexuality in the Netherlands play a less important role in Austria.

The **UK** devotes 43% of its questions to issues of education, economic order & finances, work & self-employment, the public service and its financing, and the health system. The three other countries with a liberal citizenship test, that is the US, Austria, and Germany devote respectively 2, 3 and 8% of their questions to these issues and only in the Netherlands where the share of questions about the health system outnumbers the share of questions about politics, democracy, and rights are questions about the economy and the provision of public goods & services more numerous than in the UK (46% compared to 43%). At the same time, questions that can be attributed to the overall category of politics, history and geography are still more numerous (47%) in the UK than are questions about the economy and the provision of public goods & services. In addition, since the UK does not ask questions about “What is Good” its citizenship test can be classified as liberal in the Rawlsian sense. Nonetheless it has made a slightly different choice than the US, Austria, and Germany by designing a citizenship test that is partially geared towards the facilitation of everyday life. One explanation why the UK has opted for this more practice-oriented solution - which tellingly is not called British citizenship test but “life in the UK” test - is that the British citizenship test, just like the Dutch one, is required not only from candidates for naturalization but also from immigrants who wish to obtain an indefinite leave to remain. Thus, in both countries, the test not only addresses future citizens but also more recent immigrants for whom orientation in the receiving society may be an important issue.

This, however, does not explain why the **Netherlands** have granted relatively little importance to the big issue in the other countries which is “politics, democracy, and rights” and why the Dutch curriculum, contrary to the tests in other countries, includes questions on “What is Good” that do not correspond to the definition of a liberal citizenship test used in this paper. This might raise the question whether the existence of a non-liberal citizenship test in the Rawlsian sense means that a country’s citizenship regime is not liberal or even that the country is not liberal? First and foremost, it should be underlined that citizenship tests are but one aspect of a multifaceted citizenship regime that citizenship policy indices describe by using a much broader set of indicators related for example to residence requirements, dual citizenship or *ius soli* provisions. From this perspective, the role of citizenship tests should not be over-estimated: a rather illiberal citizenship test in an otherwise liberal citizenship regime does not make the entire citizenship regime illiberal, let alone the entire country in which this citizenship test has been set up. However, the classification of a citizenship test as illiberal requires some explanations as to the forces at stake in the formulation of this test and a specification of what this test is if it is not liberal in the Rawlsian sense.

In this paper, liberalism strictly refers to the way in which it has been defined by Rawls. It is the idea of a common minimum consensus (*overlapping consensus*) about a set of rights and freedoms that are decisive for the way in which a society deals with conflict that arises from the confrontation of different philosophical and religious ideas on what is good. The Dutch citizenship test largely refers to such a set of constitutional rights and freedoms that are supposed to represent an overlapping consensus but it also asks questions about (supposedly) Dutch social norms which immigrants are asked to know and respect. These questions rather follow what Thomas Spijkerboer (2007) calls a “thick public moral”. It is beyond the scope of this article to dive into the ongoing discussion whether this “state moralism” (*overheidsmoralisme*, Spijkerboer, 2007: 66) is a new phenomenon as Spijkerboer argues, whether it is part of a longer Dutch assimilationist tradition that Jan Willem Duyvendak has characterized as a “progressive monoculture” (Duyvendak, 2008; Tonkens, Hurenkamp, Duyvendak, 2008: 5) or whether it can be neglected altogether since Dutch integration policies have been and still are largely multicultural (Koopmans, 2008; Koopmans et al., 2005). However, what is striking when comparing the content of the Dutch citizenship test with the content of four other citizenship tests is the large role the Dutch state takes on in the field of immigrant integration: even details of social interactions are considered to fall under the scope of state action. This big state in the field of integration makes it difficult to subsume the content of the Dutch citizenship test under Rawls’ definition of political liberalism.

Finally, what does the presence of **lifestyle questions** and related cultural practices tell us? In fact, the presence of such questions in the Austrian, the Dutch, and the German citizenship test suggests that religiously conservative Muslims are a particular target group of these tests. These lifestyle questions which in the case of Austria and Germany refer to legal but in the case of the Netherlands also to social norms usually address issues such as the equality between men and women, the (legal) acceptance of homosexuality or the illegal character of honor killings, female genital mutilation, and forced marriage and thereby directly refer to the prominent public discussions that have taken place in Europe over the past years.

## **Conclusion: Political liberalism in restrictive citizenship regimes?**

First of all, this analysis has shown that citizenship tests are not per se liberal, illiberal or assimilationist. In this sense, citizenship tests rather are an abstract tool, as Mario Peucker (2008) phrased it. However, if Peucker’s hypothesis was true that the national context (and not the content) decides over the function of citizenship tests, we would expect citizenship tests in restrictive citizenship regimes to be restrictive or to fulfill a restrictive function and citizenship tests in

open citizenship regimes to be liberal or to fulfill a liberal function. This contribution has had the surprising result that this is not the case: The content of citizenship tests in restrictive citizenship regimes can be as liberal in the Rawlsian sense as the content of citizenship tests in open citizenship regimes. This result suggests that the internal variance between open and restrictive elements of legislation within one citizenship regime should not be underestimated. Decisions that European countries make on the number of years of residence required for naturalization, the access to citizenship for children of immigrants born in the country or the regulations on dual citizenship may predict if these countries opt for a citizenship test or not but it does not necessarily predict the content of such a citizenship test.

Mario Peucker (2008) concludes from the respective national context on the function of a citizenship test. This analysis, however, has shown that the content of a citizenship test tells us far more about its meaning than the national context: In a country where access to citizenship is made rather difficult, a citizenship test may still be designed in a way to make sure that the candidate for naturalization is familiar with the political system, the history and the geography of the country rather than with national traditions and issues of public moral. Or, to put it in other words, it is not because a country has opted for a restrictive citizenship regime that it defines the basic values to be shared by all citizens in an ethnic or assimilationist way. In this sense, the cases compared here have with the exception of the Dutch test confirmed Joppke's (2007: 1) thesis that "illiberal means" can go along with "liberal goals". However, the designation of civic integration requirements as "illiberal means" is easily misleading if understood in the Rawlsian sense that is the otherwise predominant definition of liberalism used in Joppke's contribution. At least with regard to citizenship tests, it might be less ambiguous to speak of "the pursuit of liberal goals with restrictive means" since citizenship tests can have a largely liberal content but restrict access to citizenship given the fact that they are a *conditio sine qua non* for citizenship.<sup>27</sup>

All in all the present analysis has shown that an interpretation of the content of citizenship tests with the typologies from the recent literature on civic integration (restrictive versus open citizenship regimes and cultural assimilation versus political liberalism) is difficult and that the equation of restrictive citizenship regime with cultural assimilation or open citizenship regime with political liberalism is outright misleading: countries that require a rather high number of years of residence before attributing citizenship or that refuse dual citizenship are not necessarily identical with the countries that include cultural or religious difference in their framing of citizenship for migrants. Hence, beyond the use of citizenship tests as an indicator for how demanding the conditions for nationality acquisition

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<sup>27</sup> It might be interesting to note, though, that even in Germany where the candidate for naturalization has to familiarize with 310 questions to prepare for the federal citizenship test, the pass rate for the test has been over 98 per cent during the first year of implementation. This high pass rate, however, does not take into account the applications that have never been filed because the potential applicant feared the test.

in a given European country are<sup>28</sup>, it might be worthwhile to further explore the idea arisen from the analysis of the Dutch case: citizenship tests might tell us more about the competence that a state attributes itself in the management of cultural or religious diversity than about how easy or difficult it is for migrants to become part of that national community.

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<sup>28</sup> In citizenship indices such as MIPEX 2006 and CPI (Howard, 2009) the existence of citizenship tests adds up to the restrictive character of a citizenship regime while the non-existence adds up to its openness.

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## **Appendix: List of thematic categories and sub-categories with basic coding**

### **CATEGORY 1: POLITICS, HISTORY & GEOGRAPHY**

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#### **Political System, Democracy, Rights**

- The political system, democracy and the specific words used to describe this system
- The constitution as the basis of the democratic system
- The EU (if concerning the political system)
- Forms of political participation and the organization of elections
- (Fundamental) Rights including anti-discrimination legislation
- Issues that relate to the political system such as the federal organization or the political parties.
- NOT included in this theme are: the name of current politicians and the recognition of official buildings. They belong to the next theme.

#### **History, geography, national symbols**

- National history including the construction of the European Union
- National and European geography
- National symbols such as the flag or the national anthem
- Other knowledge about the country: name of current politicians, recognition of official buildings
- NOT included in this theme are the national designations for state institutions such as the military or the parliament

#### **Separation of state & church, freedom of religion**

- The relationship between state and church
- Fundamental religious rights

#### **Administration and formalities**

- Registration office, driver's license, residence permit, dog license etc.
- Organization and distribution of tasks in the executive

### **CATEGORY 2: THE ECONOMY AND THE PROVISION OF PUBLIC GOODS & SERVICES**

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#### **Work and self-employment**

- Looking for work
- Work contracts, salaries, and pay rolls
- Representation of employees (trade unions, workers' councils)

#### **Public service and its financing**

- Knowing about and asking for welfare state provisions
- Provision of collective goods
- The financing of public services through taxes (including tax paying)
- Services deliberately not provided for by the state

**Health**

- The provision of a public health system and how to use it
- Individual responsibilities in the health system

**Education in the educational system**

- School and diplomas
- Language learning
- NOT part of this theme is the education of children by their parents. This belongs to category 3, theme “lifestyles”
- NOT part of this theme are questions on age limits for compulsory education since they have been classified under Category 1 theme “political system, democracy, rights” (knowledge of legal regulations)

**Economic order**

- Besides the designation of the economic order in the respective country this theme includes questions about the costs of living
- The financial system and banks

**CATEGORY 3: TRADITIONS AND PUBLIC MORAL**

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**Traditions and Customs**

- Cultural specificities of the host country
- Traditional holidays and how they are celebrated

**Lifestyles**

- Family, partnership and marriage
- The education of children
- Sexuality and homosexuality
- Gender equality

**How-to guide on etiquette**

- How to behave properly in the country of immigration
- Guide to adequate social relations with neighbors, colleagues and friends
- How to deal with cultural and religious difference

**CATEGORY “OTHER”:**

- This category gathers questions that could not be attributed to any of the previous thematic categories. Examples are renting an apartment, buying a house, volunteering.