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Barriers to naturalization: How dual citizenship restrictions impede full membership

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Abstract

Dual citizenship restrictions are widely recognized as one of the major barriers for immigrant naturalization. Yet, we know surprisingly little about what drives migrants' concerns about trading off their former citizenship for a new one. This paper aims at closing this gap by analysing the interrelation between dual citizenship policies and naturalization outcomes on basis of original survey data from Germany. I examine how dual citizenship restrictions as well as subjectively perceived barriers concerning acceptance and belonging regarding citizenship change drive immigrants' naturalization decisions. Using cluster-robust logistic regression models clustered by origin country, I find that the requirement of giving up one's original citizenship for naturalization impedes immigrants' naturalization decisions and that perceived barriers concerning acceptance and belonging are also relevant for long-term exclusion from full membership in the destination country.

INTRODUCTION

The access to citizenship has an important impact on immigrants' opportunities in their country of residence. Several researchers have shown positive outcomes of naturalization for immigrants' socio-economic and social integration, for example regarding the access to the labour market, wages, political knowledge and participation as well as identification with the country of residence (e.g. Bevelander & Pendakur, 2011, 2012; Fick, 2016; Hainmueller et al., 2013; Steinhardt, 2012).¹ Moreover, naturalization currently remains the only serious option for immigrants to acquire national voting rights in most polities since denizen enfranchisement usually contributes

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to democratization at the local level only (Pedroza, 2015). Thus, barriers to naturalization impede immigrants' ability to integrate and fully participate in their country of residence.

Against this background, researchers identified several "legal and bureaucratic barriers to naturalization" (Bloemraad, 2006: 928). These are, for example, the legal and institutional context in the country of descent as well as the country of residence, naturalization requirements, dual citizenship regulations and policies, or bureaucratic hurdles like long processing times or administrative costs and fees (e.g. Bloemraad, 2006; Freeman et al., 2002; Hainmueller et al., 2018; Jones-Correa, 2001a; Peters et al., 2016; Spiro, 1999). In this context, the requirement of giving up the original citizenship has been described as one of the most important legal barriers for immigrant naturalization (e.g. Faist, 2004; Hammar, 1985). However, "empirical findings regarding the impact of dual citizenship toleration are ambiguous" (Peters et al., 2016: 361). One reason might be that citizenship has to be understood as a multi-dimensional concept which is more than just a set of rights, but rather "a legal status and identity" defining membership (Joppke, 1999: 630). This means that citizenship can also be a symbol of belonging. Regarding the necessity of giving up the original citizenship for naturalization, legal aspects of membership are merged with emotional aspects what raises the costs of naturalization (e.g. Hammar, 1985). This conglomerate of aspects may be one reason why we still know surprisingly little about what drives migrants' concerns about trading off their original citizenship for a new one. Does only the legal restriction play a role or are subjectively perceived barriers concerning acceptance and membership regarding citizenship change relevant as well?

This paper takes a closer look at this question with special regard to dual citizenship policies in origin and destination countries as well as immigrants' individual desires regarding citizenship retention. First, I examine how dual citizenship options drive immigrants' naturalization decisions, taking into account subjectively perceived barriers concerning acceptance and belonging regarding citizenship change. Secondly, I take a closer look at the individual importance of giving up the original citizenship for long-term immigrants' decision not to acquire their destination country's citizenship, taking also into consideration subjectively perceived barriers concerning acceptance and belonging. This allows me to obtain a generalizable picture about the importance of dual citizenship restrictions and individual perceptions to citizenship change.

I use survey data from Germany to answer this research question. Germany is a suitable case to study the interrelation between naturalization and dual citizenship restrictions for multiple reasons: Historically, Germany is known for its comparatively restrictive approach to citizenship acquisition as well as dual citizenship. The country only began to slowly liberalize both aspects in the late 1990s. Nevertheless, dual citizenship is still not accepted in general and tolerance of dual citizenship as well as facilitating naturalization are often negatively debated, for example in the run-up to the 2017 parliamentary elections (e.g. Baldi & Goodman, 2015; The Telegraph, 2017). Due to several amendments of the 2000 Nationality Act, today German citizenship law is marked by a "dual-passport asymmetry" (Expert Council, 2015: 18) in several respects: Dual citizenship is usually accepted when citizenship is acquired through birth, but only exceptionally if German citizenship is acquired through naturalization. Regarding the latter, dual citizenship acceptance varies depending on the immigrants' countries of origin. This makes it possible to study the impact of different dual citizenship regulations within a single country. Nevertheless, even though Germany is a unique case in Europe and across the world regarding citizenship policies, it is one example for several countries which still do not fully accept dual citizenship. In Europe, for example, renunciation or automatic loss of citizenship of another country is also a condition for naturalization in Austria, Bulgaria, Croatia, Estonia, Latvia, Lithuania, the Netherlands, Slovenia and Spain.²

Following, I first provide an overview of the conditions of dual citizenship in Germany, before I discuss empirical findings on the relation between dual citizenship and naturalization. Then, I present the underlying theoretical considerations of my analyses. Next, I describe my data and measurement and present my analyses. Finally, I summarize and discuss the results which show that the requirement of giving up one's original citizenship for naturalization impedes individual naturalization decisions even if other individual aspects are considered.

DUAL CITIZENSHIP IN GERMANY

In Germany, which has been described as an “ethnic” nation, “the automatic transformation of immigrants into citizens [...] [was] unthinkable” (Brubaker, 1992: 185) for a long time since citizenship was solely based on descent (*ius sanguinis*). Although immigrants had the opportunity to acquire citizenship through naturalization on discretionary decision, they did not have any legal claim up to the early 1990s when Germany began to slowly reform its citizenship regulations (e.g. Green, 2001).³ However, a real paradigm shift did not take place until a fundamental reform in 1999 (e.g. Joppke, 2003). It introduced the possibility of acquiring German citizenship through birth on territory for children of foreign parents (*ius soli*), but also significantly reduced the requirements for naturalization, for example the mandatory residence period. Even though the original bill of the Coalition between the Social Democratic Party (SPD) and the Green Party also provided for the broad acceptance of dual citizenship, the final proposal of the Nationality Act did not allow dual citizenship in general. This was preceded by an intensive political debate and a change in the majority in the Bundesrat, the upper house of the German parliament, whose approval was required for the reform of the Nationality Act. Regarding naturalization, the law even contains a tightening by closing a legal loophole concerning dual citizenship: The so-called domestic clause was abolished. This clause had previously enabled naturalized immigrants to circumvent the existing requirement to renounce their foreign citizenship for naturalization by reacquiring their original citizenship after naturalization (e.g. Falcke & Vink, 2020; Hailbronner & Farahat, 2015).

Nevertheless, the Nationality Act coming into force on 1 January 2000 did not prohibit dual citizenship for immigrants of all countries equally. Naturalized EU citizens (as well as citizens of Switzerland) were initially allowed to keep their citizenship under the condition of reciprocity of treatment (i.e. if the respective country also allows dual citizenship for Germans). Amendments in the aftermath of the 1999 citizenship reform even led to a general acceptance of dual citizenship for immigrants from these countries since 2007. In contrast, immigrants from non-EU countries still have to give up their foreign citizenship for naturalization. Dual citizenship for non-EU citizens is only possible in exceptional cases, for example if it is impossible to give up the origin country's citizenship or if the origin country regularly rejects a release.⁴ Moreover, it is not required that recognized refugees have to give up their original citizenship.

In contrast, dual citizenship is generally accepted if citizenship is acquired by birth, for example for children born to binational parents. Moreover, since the Nationality Act came into force in 2000, children born in Germany to foreign parents automatically acquire the German as well as their parents' citizenship if at least one parent has been a legal resident for a period of eight years and holds an unlimited right of residence (conditional *ius soli*). Until the end of 2014, these children had to decide by the age of 23 between their German citizenship and the citizenship passed down to them by their parents (known as *Optionspflicht*, the “duty to choose”). This requirement has been abolished through an amendment in 2014 (for a detailed discussion see Winter & Patzelt, 2015; Worbs, 2014).

As a consequence to the aforementioned exceptions, dual citizenship rates vary considerably between naturalized immigrants from different countries of origin: While in 2020, for example, 100 per cent of all naturalized Iranians and 99 per cent of all naturalized EU citizens retained their original citizenship, and 90 per cent of all people of Turkish origin had to renounce their Turkish citizenship for naturalization (Destatis, 2021a). In 2020, there were approximately 2.9 million foreign nationals living in Germany who fulfilled the minimum length of residence required for naturalization, but whose citizenship may not be retained due to one of the aforementioned exceptions (Destatis, 2021b; own calculations).

EMPIRICAL FINDINGS ON NATURALIZATION AND DUAL CITIZENSHIP

The question of the effects of dual citizenship policies has been tackled with various empirical approaches and has produced different and sometimes contradicting results.

Research on migration flows suggests that migrants are well informed about dual citizenship opportunities and that these opportunities influence their decision to move to a country: Sending states allowing for dual citizenship experience more emigration than countries not allowing dual citizenship and migration flows are higher to countries allowing dual citizenship than to countries forbidding dual citizenship. Moreover, migration flows are the highest between sending and receiving states allowing dual citizenship and lowest between sending states prohibiting and receiving states allowing dual citizenship (Alarian & Goodman, 2017).

Studies focussing on naturalization rates of different immigrant groups have obtained contradictory results regarding the effect of dual citizenship policies on immigrant naturalization. Several researchers study the effect of legal requirements in the countries of origin and find that immigrants coming from countries that recognize dual citizenship are less likely to be naturalized in countries that generally accept dual citizenship than those who come from countries not recognizing dual citizenship (DeVoretz, 2008; Dronkers & Vink, 2012; Yang, 1994b). Other authors find higher naturalization rates for those who are allowed to retain citizenship, either through legal requirements in the origin country and/or the country of residence (Chiswick & Miller, 2009; Mossaad et al., 2018; Vink et al., 2013). Still others confirm this only for few immigrant groups (Helgertz & Bevelander, 2017; Logan et al., 2012).

Results from studies focussing on policy changes are more unanimous regarding the effect of dual citizenship policies on immigrant naturalization. Multivariate studies on policy changes in origin countries find “relatively small, but positive, effects” (Jones-Correa, 2001b: 1023) for immigrants living in countries that generally allow dual citizenship after their countries of origin recognized dual citizenship. Research on these policy changes finds not only positive effects of dual citizenship on immigrant naturalization, but also indicates positive effects on immigrants’ socio-economic integration, for example employment and wages (Mazzolari, 2009). Regarding policy changes in immigration countries, studies find that immigrant naturalization increased when dual citizenship was accepted and decreased when dual citizenship was abolished (e.g. Bevelander & Veenman, 2006; Böcker & Thränhardt, 2006; Labussière & Vink, 2020; Vink et al., 2020; see Falcke & Vink, 2020 for other findings).

Immigrant surveys show that immigrants who have to renounce their original citizenship before acquiring their country of residence’s citizenship see renunciation as one of the biggest obstacles and that origin country tolerance of dual citizenship is correlated with immigrants’ interest in naturalization in the country of residence (e.g. Chavez, 1997; Huddleston, 2020; Huddleston & Tjaden, 2012). Regarding the German case, where dual citizenship is not generally accepted, surveys regularly show that immigrants see this restriction as one of the most important barriers for naturalization (e.g. Venema & Grimm, 2002; Weinmann et al., 2012). Nevertheless, few surveys also show that some immigrants do not have a problem with giving up citizenship and others decide to naturalize even though they have a problem with giving up citizenship (e.g. Diehl & Blohm, 2001; Weinmann et al., 2012). Other surveys suggest that “the rejection of dual citizenship seems to be so deeply entrenched in Germany that even those who by law are eligible to hold two passports are not aware of their right or avoid its application with an eye towards the significant effort required to do so” (Fick, 2016: 118; see also Weinmann et al., 2012; Fick et al., 2014).

As has been shown, research results regarding the effect of dual citizenship policies on immigrants’ naturalization behaviour are partly inconsistent. One reason might be that assuming all immigrants would acquire citizenship if they would be able to keep their original citizenship underestimates that naturalization decisions do not only depend on the legal ability to naturalize.

THEORETICAL BACKGROUND

Understanding citizenship as a legal status and identity (Joppke, 1999) implies that citizenship not only defines membership legally, but is also a symbol of membership. Thus, it can be assumed that there are not only legal barriers for naturalization, but also perceived barriers regarding membership conceptions, acceptance and feelings of belonging. Regarding these aspects of naturalization, the theory of ethnic boundary making is useful since it takes into account aspects of membership and affiliation (e.g. Diehl & Blohm, 2003, 2011; Witte, 2014, 2018).

Ethnic boundary making can be described as drawing, maintaining and changing boundaries between ethnic or national groups (e.g. Wimmer, 2008). These boundaries are institutionally and socially created and shaped from both the origin and the destination context. It can be distinguished between legal and symbolic boundaries. This distinction makes the theory useful for analysing legal barriers to naturalization and perceived barriers regarding membership conceptions, acceptance and feelings of belonging. Regarding citizenship acquisition, legal boundaries for example describe policies or legal preconditions for legal membership acquisition like the necessity of giving up the original citizenship for naturalization. Symbolic boundaries can be defined as socially created distinctions that "separate people into groups and generate feelings of similarity and membership" (Lamont & Molnár, 2002: 168). These symbolic aspects of membership, like the prevailing definition of belonging in a national context, are mostly based on individual's feelings, perceptions and expectations (e.g. Witte, 2018).

Naturalization under the condition of giving up the origin country's citizenship can be described as a form of individual boundary crossing (Alba, 2005; Diehl & Blohm, 2011), since

the boundary is bright and thus there is no ambiguity in the location of individuals with respect to it. In this case, assimilation is likely to take the form of boundary crossing and will generally be experienced by the individual as something akin to a conversion, i.e., a departure from one group and a discarding of signs of membership in it, linked to an attempt to enter into another, with all the social and psychic burdens a conversion process entails: growing distance from peers, feelings of disloyalty, and anxieties about acceptance.

(Alba, 2005: 24)

The latter can for example be the case if the origin group opposes naturalization or a lack of acceptance in the country of residence. For Germany, previous research showed that it is important for citizenship decisions whether the family supports or opposes the decision (e.g. Diehl & Fick, 2012; Worbs, 2014). Furthermore, it has been shown that some young immigrants believe that having German citizenship would not change the perceptions of the native German majority about them and that they would still be excluded and discriminated against (Celik, 2015).

Against this background, it can be assumed that there are not only legal barriers for naturalization like the necessity of giving up the original citizenship, but also subjectively perceived barriers regarding membership conceptions, acceptance and feelings of belonging. Moreover, it can be assumed that these perceived barriers are especially relevant for those immigrants who have a problem with giving up their original citizenship for naturalization. Thus, two aspects should be considered regarding naturalization and dual citizenship: (1) legal barriers in the origin country and the country of residence for retaining the original citizenship and (2) subjectively perceived barriers concerning acceptance and belonging regarding the origin as well as the residence context.

Based on the above, my hypotheses are as follows:

Hypothesis 1 *Immigrants who are able to retain their original citizenship are more likely to naturalize than immigrants who are not able to retain their original citizenship.*

Hypothesis 2a *Immigrants who perceive barriers concerning acceptance and belonging are less likely to naturalize under the condition of giving up their original citizenship than immigrants not perceiving these barriers.*

Hypothesis 2b *Immigrants who perceive barriers concerning acceptance and belonging are more likely to desire to retain their original citizenship than immigrants not perceiving these barriers.*

DATA AND ANALYSIS

Data

In order to study how dual citizenship restrictions and individual perceptions drive naturalization decisions, I use data from the 2011 BAMF Naturalisation Study, a cross-sectional survey of the immigrant population in Germany (see Weinmann et al., 2012). It was designed for a comparison of (1) first and second generation immigrants who were naturalized between 2005 and the time of the survey (2011), (2) immigrants undergoing the naturalization process at the time of the survey and (3) immigrants who fulfil the necessary residence requirements for naturalization at the time of the survey (i.e. have been living in Germany for at least eight years and have a secure residence status), but did not yet naturalize (non-naturalized immigrants). The random sampling for all three target groups was devised disproportionately, in order to warrant a sufficient basis of survey interviews for the five most important regions of origin of naturalized and non-naturalized persons living in Germany (i.e. Turkey, successor states to the former Yugoslavia, Greece/Italy, Afghanistan/Iran/Iraq and Russian Federation/Ukraine/Belarus). All in all there are 17 countries of origin represented in the sample (see Table S2). To ensure a representative analysis, the data are weighted on the basis of information from official statistics for naturalizations and foreign nationals in Germany. All naturalized immigrants were 18 or older at the time of their naturalization to ensure that they did not co-naturalize with their parents. All other interviewees were 18 or older at the time of the survey (for a more detailed overview about data collection and sampling see Annex S1).

A strength of the survey is that it provides data for immigrants who actively and consciously decided to acquire their country of residence's citizenship as well as immigrants who did not naturalize but fulfil important requirements for naturalization. Furthermore, the data allow an isolated analysis of the question whether giving up the original citizenship is seen as a problem for naturalization or not. The data include first and second generation immigrants. Second generation immigrants in the sample are born between 1944 and 1993. Thus, they could not benefit from the conditional *ius soli* which was introduced in German nationality law in 2000. Therefore, regarding the acquisition of citizenship, second generation immigrants in the sample are comparable with first generation immigrants since their only option to acquire German citizenship is naturalization.

Another strength of the survey is detailed information about the immigrants' countries of origin. This makes it possible to include information on countries of origin, like information about the possibility of dual citizenship. All in all dual citizenship is possible for immigrants from four countries of origin in the sample. These are immigrants from Greece and Italy who are allowed to retain their original citizenship due to special regulations for EU citizens. Moreover, immigrants from Afghanistan and Iran are allowed to retain their original citizenship since German authorities know that citizenship renunciations are "never or hardly ever" accepted in these countries (for further information see Annex S2 and Table S2).

Measures

Dependent variables

My analyses focus on two outcome variables: In a first step, I examine how dual citizenship options drive long-term immigrants' naturalization decisions, taking into account subjectively perceived barriers concerning acceptance and belonging regarding citizenship change. In the next step, I take a closer look at the individual importance of

giving up the original citizenship for long-term immigrants' decision not to acquire their destination country's citizenship: Among those immigrants who have not yet naturalized or applied for naturalization, I analyse the interrelation between long-term immigrants' decisions not to acquire their destination country's citizenship under the condition of giving up their original citizenship and the aforementioned subjectively perceived barriers. The two dependent variables are operationalized and analysed as follows:

Analysis 1: Naturalization decision is coded as a binary variable indicating whether an immigrant actively and consciously decided for naturalization or not (0 = no; 1 = yes). Naturalized immigrants and immigrants going through the naturalization process are treated as one group. Immigrants from both groups have taken a conscious decision to naturalize and applied for naturalization. Even though the authorities have not yet decided on the application in the latter case, rejection rates in Germany are comparatively low (e.g. Behörde für Inneres und Sport, 2020; Regierungspräsidium Darmstadt, 2019). Conversely, it is assumed that non-naturalized immigrants are denizens who are eligible for naturalization and deliberately decided not to naturalize (see for this interpretation Bauböck, 2007). At the time of taking part in the survey, they were fulfilling the necessary residence requirements for naturalization since they had been living in Germany for at least eight years and had a secure residence status.

Analysis 2: The individual importance of giving up the original citizenship for long-term immigrants' decision not to acquire their destination country's citizenship is analysed through the desire to retain the original citizenship as a reason against naturalization. This analysis focusses on the subsample of non-naturalized immigrants. The analysis includes immigrants who are able to retain their original citizenship and immigrants who are not since survey results indicate that those who are able to have dual citizenship are not necessarily aware of their right (e.g. Fick et al., 2014; Weinmann et al., 2012). Non-naturalized immigrants were given different statements on potential reasons against naturalization. One reason was "I want to retain my original citizenship." Then, they were asked whether these reasons are of importance for them or not. The response categories range from "very important" (1) to "not important" (4). The categories are summarized to a binary variable that indicates whether an immigrant has a desire to keep the original citizenship (1) or not (0; for further information on operationalization and coding see Table S1).

In both analyses, I conduct logistic regression models that will be described after the presentation of the explanatory and control variables.

Explanatory and control variables

In *Analysis 1*, I consider two types of explanatory variables: (1) legal barriers concerning dual citizenship and (2) subjectively perceived barriers concerning acceptance and belonging regarding citizenship change.

Legal barriers concerning dual citizenship are measured through the possibility of dual citizenship. This variable has been coded for origin countries in the sample based on different sources. It shows whether immigrants from a certain country are able to have dual citizenship or not when they naturalize in the country of residence. The variable includes information on both legal contexts: official information from the German Federal Ministry of the Interior whether immigrants from certain countries are exceptionally allowed to retain their original citizenship when they acquire German citizenship (see Annex S2) as well as information on origin country rules regarding loss or renunciation of citizenship after voluntarily acquiring another citizenship based on the MACIMIDE Global Expatriate Dual Citizenship Database (Vink et al., 2015). Regarding naturalized immigrants, I use the respective information for the year in which an individual has been naturalized for coding. As for immigrants undergoing the naturalization process and non-naturalized immigrants, I use the respective information for the time of the survey in 2011. Possibility of dual citizenship is coded "yes" (1) if citizenship retention is possible due to regulations in the receiving country and if there is no automatic loss of the origin country's citizenship when the receiving country's citizenship is voluntarily acquired. The variable is coded "no" (0) if citizenship retention is not possible in the receiving country and the origin country's citizenship is

automatically lost when the receiving country's citizenship is voluntarily acquired. The same applies if citizenship retention is not possible in the receiving country even if the origin country's citizenship is not automatically lost when the receiving country's citizenship is voluntarily acquired (for an overview about coding see Annex S2 and Table S2).

For subjectively *perceived barriers* concerning acceptance and belonging regarding citizenship change, I include different operationalizations to take into account perceived barriers regarding the destination and the origin context. These aspects are measured through statements reflecting individual's feelings, perceptions and expectations. The perception of acceptance through the residence country's majority is used to measure a subjectively perceived barrier regarding the destination context. The variable indicates whether an individual believes that he or she is perceived as a foreigner in the country of residence. The variable is useful to measure residence context-related perceived barriers regarding citizenship change since research has shown that some immigrants believe that acquiring the residence country's citizenship would not change the native German majority's perceptions about them. The statement that a person's family is opposed to naturalization is used to measure subjectively perceived barriers regarding the origin context. Opposing naturalization is synonymous with opposing citizenship change due to the existing dual citizenship restrictions regarding naturalization in the German case.

Control variables: In the 2011 BAMF Naturalisation Study, it was assumed that non-naturalized immigrants would be eligible for naturalization if they fulfil the necessary residence requirements for naturalization. Since proof of German language proficiency is a further requirement for naturalization in Germany, I use German language skills as a control variable for integration requirements. The individual level of integration is an important determinant for naturalization as has been shown before (e.g. Bernard, 1936; Liang, 1994; Yang, 1994b). Studies also show the importance of social identity and symbolic aspects of membership for naturalization (e.g. Diehl & Blohm, 2003; Hochman, 2011; Maehler et al., 2019). Therefore, an item indicating whether a person feels a greater affinity with the origin country or the country of residence (or feels affiliated with both countries equally) is included in the analysis. A further control variable is included measuring the potential benefit from naturalization since some researchers show a relationship between immigrants' naturalization intentions and perceived costs and benefits (e.g. Garcia, 1981; Witte, 2014, 2018). This variable is based on the Quality of Nationality Index for 2011 (Kochenov & Lindeboom, 2019; for further information see Annex S2) and describes the quality of the original citizenship in relationship to the quality of the country of residence's citizenship (i.e. difference between values). The intention to stay in the receiving country is also positively correlated to immigrants' naturalization behaviour; the length of stay in the receiving country has an ambivalent impact: some authors find positive correlations between the duration of stay and naturalization or the intention to naturalize, and some find negative effects for immigrants with a very long stay (e.g. Constant et al., 2009; Diehl & Blohm, 2003; Evans, 1988; Yang, 1994a). Against this background, the intention and the length of stay in the receiving country are included in the analysis. Furthermore, sex serves as control variable. Table S3 gives an overview of the sample characteristics regarding all individual level variables. For further information on operationalization and coding, see Annex S2 and Table S1 and S2.

Including information on the origin country level in the analysis of the survey data results in a hierarchical data structure with immigrants nested in 15 origin countries (Table S2). Due to the limited number of contextual units, I conduct a cluster-robust logistic regression model clustered by origin country. 1,046 cases are included in the regression analysis due to listwise deletion.

In *Analysis 2*, I focus on subjectively *perceived barriers* concerning acceptance and belonging regarding citizenship change. These are measured similarly to my first analysis: the perception of being seen as a foreigner (destination context), the perception that one's family opposes naturalization (origin context).

Again, German language skills, identification with the origin country and the country of residence, perceived benefits from naturalization, length of stay, the intention to stay and sex serve as control variables. Due to the limited sample size, I conduct a cluster-robust logistic regression clustered by origin country, but without including origin context variables. Perceived benefit from naturalization is measured through the subjective expectation

whether naturalization brings individual benefits or not. 361 cases are included in the regression analysis due to listwise deletion. For an overview of the sample characteristics see Table S3, for further information on operationalization and coding, see Table S1.

Analyses and findings

Analysis 1

Figure 1 visualizes the main results from the cluster-robust logistic regression model with “naturalization decision” as the dependent variable (0 = no; 1 = yes) clustered by origin country (full details are provided in Table S4). The model shows immigrants able to keep their original citizenship are more likely to decide for naturalization than immigrants who have to give up their original citizenship for naturalization (H1). The wide confidence intervals may be a sign for a possible effect heterogeneity due to the limited variation of origin countries in the sample. In the group of immigrants able to retain their citizenship, immigrants from Greece and Italy, for example, may be less likely to naturalize compared to immigrants from Afghanistan and Iran whose legal benefits from naturalization are larger. My hypothesis regarding perceived barriers can only be confirmed to a limited extent (H2a). I find that only perceived barriers concerning acceptance and belonging regarding the origin context are relevant for citizenship change: While naturalization decisions are less likely for those immigrants whose family opposes naturalization, the perception of acceptance through the residence country's majority is not that relevant. Whether an individual believes that he or she is perceived as a foreigner in the country of residence is not significantly correlated to naturalization.

I controlled for further important determinants of immigrant naturalization: The residence country's language proficiency as a proxy for requirements regarding the individual level of integration is positively

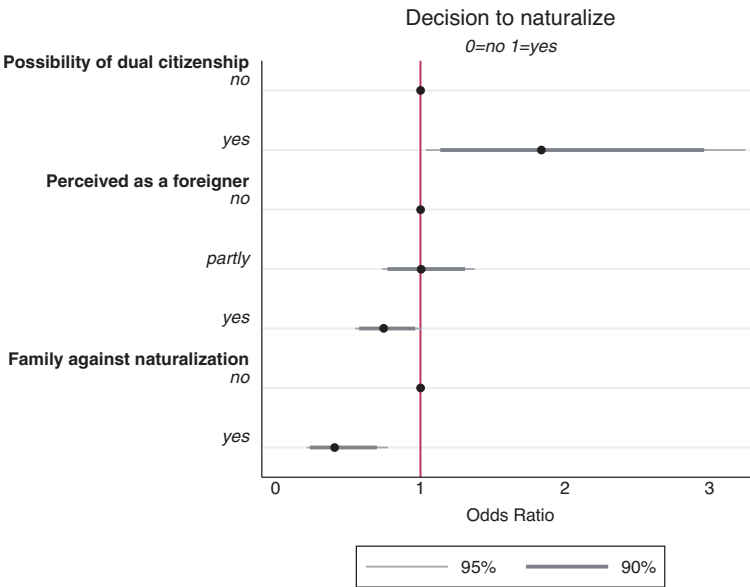


FIGURE 1 Main results of the cluster-robust logistic regression on decision to naturalize clustered by origin country (N = 1,046). Note: Control variables: residence country language proficiency, identification, difference in quality of nationality, sex, length of stay, intention to stay. Standard errors adjusted for 15 clusters. Bars represent confidence intervals. See Table S4 for full results. Source: 2011 BAMF Naturalisation Study

correlated to naturalization decisions. Immigrants who identify with the country of residence or at least equally with their origin country and the country of residence are more likely to naturalize than immigrants who identify with their origin country only. Taking into account the quality of nationality shows that immigrants are more likely to decide for naturalization if they can expect higher legal benefits from naturalization since the difference between the value of the destination country's citizenship and their origin country's is higher. The intention to stay in the receiving country is positively correlated to naturalization what is in line with previous studies. Regarding length of stay, my analysis also confirms the results of other studies: a very long stay in the country (i.e. at least 25 years) is negatively correlated to naturalization decisions. This effect has been explained by the fact that immigrants who have resided in the country for a long time without citizenship "learn to live without it and see no advantage in changing their citizenship status" (Constant et al., 2009: 80; see also Diehl & Blohm, 2003). There are no significant effects for sex. Several robustness checks are presented in Annex S3.

Analysis 2

Figure 2 visualizes the main results from the cluster-robust logistic regression model with "desire to retain the original citizenship" as the dependent variable (0 = no; 1 = yes) clustered by origin country (full details are provided in Table S5). My hypothesis can only be partially confirmed (H2b): Giving up the original citizenship appears to be a problem for non-naturalized immigrants who perceive origin context-related barriers, but not for those who perceive destination context-related barriers. Non-naturalized immigrants who have family members opposing naturalization, and thus citizenship change, are significantly more likely to desire to retain their origin country's

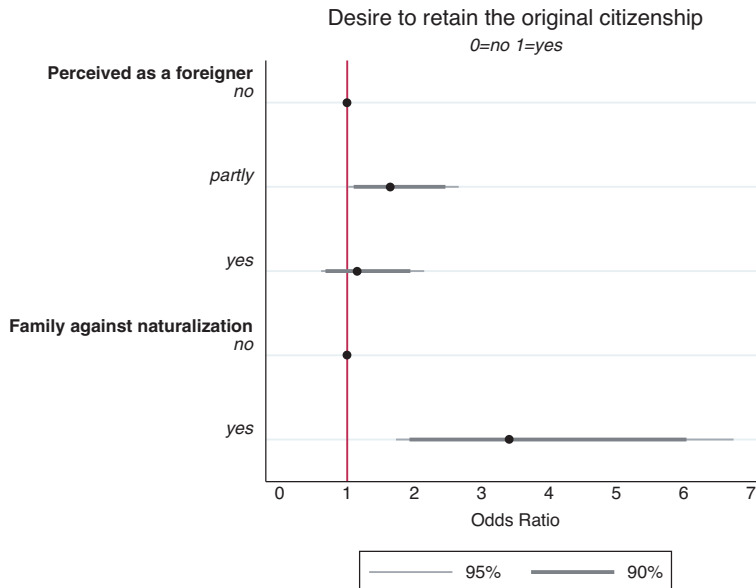


FIGURE 2 Main results of the cluster-robust logistic regression on desire to retain the original citizenship clustered by origin country (non-naturalized immigrants only, $N = 361$). *Note:* Control variables: residence country language proficiency, identification, subjective expectation of benefits through naturalization, sex, length of stay, intention to stay. Standard errors adjusted for 16 clusters. Bars represent confidence intervals. See Table S5 for full results. Source: 2011 BAMF Naturalisation Study

citizenship. Perceived barriers regarding the destination context are not significantly correlated with the desire to retain the original citizenship.

Furthermore, non-naturalized immigrants who identify with the residence country or at least with their origin country and the residence country are less likely to desire retaining their original citizenship than those who identify with their origin country only. There is no significant effect for the subjective expectation of benefits through naturalization. Moreover, the analysis shows that a stay of under 25 years is negatively correlated to the desire to retain the origin country's citizenship. However, there is no significant effect for the intention to stay. The same applies to sex and the individual level of integration measured through residence country language skills. Several robustness checks are presented in Annex S3.

CONCLUSION AND DISCUSSION

The most important implication of this paper is that the requirement of giving up the original citizenship is an important barrier for immigrant naturalization. However, there are further barriers regarding citizenship change besides this legal barrier. Subjectively, perceived barriers concerning acceptance and belonging regarding citizenship change are also relevant when it comes to naturalization decisions under the condition of giving up the original citizenship. Nevertheless, these perceived barriers are particularly relevant regarding the origin context. As has been shown, family resistance to naturalization is negatively correlated with the decision to acquire the residence country's citizenship, which is equivalent to citizenship change due to the existing dual citizenship restrictions in the German context. Against this, the results suggest that residence context-related perceived barriers regarding citizenship change are not that relevant for naturalization decisions. Immigrants decide to acquire the residence country's citizenship irrespective of whether they believe to be perceived as a foreigner or not. Regarding long-term immigrants' desire to retain their original citizenship, the results show also that citizenship change appears to be a problem for non-naturalized immigrants who perceive origin context-related barriers, but not for those who perceive destination context-related barriers. The importance of country-of-origin aspects is also supported by other findings, for example, that immigrants who identify with their origin country only are less likely to naturalize than those who identify with their country of residence (or both countries equally). Even though Germany might be a very special case regarding citizenship policy, these findings are important. They suggest that especially emotional and symbolic attachment to the origin context is relevant that giving up the original citizenship is not an option for some immigrants.

With a view to the existing literature, this paper closes a gap by studying the impact of different dual citizenship options, taking also into consideration subjectively perceived barriers concerning acceptance and belonging regarding citizenship change. Bringing together survey data from Germany where dual citizenship acceptance varies depending on immigrants' countries of origin if citizenship is acquired through naturalization with origin country data regarding this variation of immigrants' legal possibility to retain their original citizenship allows an in-depth analysis of the interrelation between naturalization and dual citizenship restrictions as well as immigrants' desires concerning dual citizenship. This approach strengthens previous findings on the effect of dual citizenship restrictions by also looking for the first time at subjectively perceived barriers concerning acceptance and belonging regarding citizenship change and controlling for a variety of individual aspects identified in the literature as significant for naturalization, not only regarding sociodemographics and individual integration, but also regarding aspects of identity and utility-maximization.

Regarding practical implications in the context of immigrant integration, this paper shows that the impossibility of dual citizenship represents a barrier for the political integration of immigrants since those who have to give up citizenship are less likely to decide for naturalization. This has significant implications for countries with exclusive naturalization policies since naturalization currently remains the only serious option for immigrants to acquire national voting rights in most polities. The basic principle of self-determination is violated if permanent

immigrants are non-citizens (denizens) and thus do not have full political rights (under-inclusiveness, e.g. Bauböck, 2015; Dahl, 1989: 120–129). If dual citizenship is accepted, the influence of subjectively perceived origin-context-related barriers, such as family resistance to naturalization, should also diminish because naturalization would no longer have to be accomplished as citizenship change. Moreover, symbolic gestures could encourage immigrants to naturalize: After the City of Hamburg's former mayor, Olaf Scholz, took the lead of the city's naturalization campaign through a personal letter inviting immigrants eligible for naturalization to acquire German citizenship, the number of immigrants becoming citizens rapidly increased in Hamburg (Cities of Migration, 2014). Actively addressing and inviting immigrants to naturalize might reduce the influence of subjectively perceived barriers concerning acceptance and belonging on naturalization decisions.

PEER REVIEW

The peer review history for this article is available at <https://publons.com/publon/10.1111/imig.12950>.

DATA AVAILABILITY STATEMENT

The survey data used in this study have been provided by the Research Centre Migration, Integration and Asylum of the German Federal Office for Migration and Refugees (BAMF) for this research. The data can be requested at BAMF's Research Data Centre, Frankenstrasse 210, D-90461 Nürnberg (<https://www.bamf.de/EN/Themen/Forschung/Forschungsdatenzentrum/forschungsdatenzentrum-node.html;sessionid=AA27AB612F7499CFB583C47B1F354759.internet282>). Stata code for replication can be requested from the author.

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ENDNOTES

1. The survey data used in this study have been provided by the Research Centre Migration, Integration and Asylum of the German Federal Office for Migration and Refugees (BAMF) for this research. The data have been analysed only by the author mentioned in the user contract. Stata code for replication can be requested from the author. I thank Sybille Münch, Maarten Vink and Susanne Worbs for their useful comments on this paper. This paper solely reflects the personal opinion of the author.
2. See GLOBALCIT, 2017; Mode A06.
3. Only *Statusdeutsche*, mostly refugees and displaced persons of German ethnicity (*Volkszugehörigkeit*), were entitled to acquire German citizenship.
4. The former is generally applicable to Argentina and Bolivia, or to native citizens of Costa Rica, Ecuador, Guatemala, Honduras, Mexico, Nicaragua, Panama and Uruguay, and in certain cases Brazil and the Dominican Republic. The latter applies to Afghanistan, Algeria, Angola, Eritrea, Iran, Cuba, Lebanon, Maldives, Morocco, Nigeria, Syria, Thailand and Tunisia (Bundesministerium des Innern, 2015).

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SUPPORTING INFORMATION

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