Introduction—Changing Citizenship Theory and Practice: Comparative Perspectives in a Democratic Framework

by
Martin O. Heisler,
University of Maryland

Citizenship is an increasingly important focus in political and social theory, as well as in philosophy, legal studies, and some of the humanities. It is also a vital concern in the lives of many "real people." It figures in the assurance or denial of rights, economic benefits and social services, education, due process of law, and opportunities to affect political decisions; but it does not guarantee equality, fairness, justice, economic well-being, dignity, or the respect of public officials or fellow citizens. We need to engage theoretical and normative aspects of citizenship when considering such topics as democracy and democratization, civil liberties, political participation, migration and asylum, nationality, culture, persistent inequalities, discrimination, identity and belonging, gender equity, race and ethnic relations, human rights, and globalization.

Not surprisingly, the concept of citizenship has become less clear as its relevance and prominence have increased. This is due in part to conceptual stretching brought on by the proliferation of its use and the multiplication of the perspectives of its users;[1] but it also reflects structural and normative changes in politics, the economy, and some fundamental values—including what is generally termed "globalization." Perhaps the most important of these is migration across state borders. All of this makes Morris Janowitz's observation (1980, 1) of a quarter century ago, that "the notion of citizenship requires continual conceptual, philosophical, and value clarification," more pertinent than ever.

Although such clarification would undoubtedly be useful, that is not our primary aim here. Instead, our essays illustrate and analyze changes in the world that compel—or should compel—rethinking the idea of citizenship and its uses, the ways the concept is changing, and the reasons for, and ramifications of, those changes. We raise more questions than we attempt to answer. And while much serious discussion of citizenship has tended to shy away from its crucial normative elements, we do not. Instead, we seek to chart a direction, though not a single path, toward a new problematic by calling attention to the salient novel or newly significant issues in political and social life that revolve around citizenship.

Migration—transnational and international, voluntary and forced, legal or not—is at the center of the new problematic. It educes the increasing interconnectedness of polities, economies, and societies; many of the ways in which the traditional exclusivity of states' jurisdictions is changing; the "portability" of individual human rights; the status of resident and transient aliens; relations between citizens and non-citizens; and myriad related issues.[2] It also helps to concretize both traditional state-centered assumptions regarding citizenship as loyalty, identity, and belonging and newly significant questions about membership in the polity and society and, in the broadest terms, the human and institutional boundaries of obligation and expectations.

Discourses around citizenship have shifted in most of the industrialized world, and certainly in countries with democratic regimes, from the inclusion of native populations to three overlapping subjects: cultural or communal versus individual rights; the rights, treatment, and status of non-citizens; and the meanings and forms of belonging, identity, and political membership. Much of our symposium concentrates on these concerns; and, while the essays that follow do not converge on a single point of view, they reinforce the sense that these are and will continue to be crucial issues in intellectual and policy considerations of citizenship.

The title of this essay and theme of the symposium reflect a symbiotic connection between changes in citizenship and challenges to the way we think about it. There are changes in citizenship theory and practice, and we need to consider changing theory and practice. This essay suggests one way of framing those connections.

From the Traditional through the Modern to the Post-modern

Until a hundred or so years ago, few people were full, equal citizens anywhere, even in a formal, legal, sense. Women, minors, those without property, ethnic, racial, or religious minorities, indigenous peoples, and others were relegated to second-, third- or non-citizenship status. Underlying such hierarchical citizenship were normative arguments intended to justify

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inequality in a manner analogous to the noble lie in *The Republic*. Those who enjoyed full citizenship were entitled to their status for specified reasons; others were either rightly excluded (often, it was claimed, for their own good, as in the case of women and children) or needed to earn inclusion by acquiring property, literacy, or—as in the case of descendants of slaves in the United States—grandparents or great-grandparents who had been fully enfranchised citizens (see Shklar 1991).

Such hierarchies existed among citizens and between them and members of the society, not only between citizens and foreigners.[3] Clear hierarchies of citizenship, generally accompanied by pronounced inequalities, are also noticeable at the international level, as Stephen Castles (2005) and others note. (International or extra-national aspects of citizenship are important considerations for the authors of most of our essays, and I shall return to them below.)

In states that later became developed democracies, ever-larger portions of populations were incorporated into the citizenry, at least nominally. With few exceptions—the French Revolution was a notable, if partial exception—such expansion was driven by elites' needs for soldiers and revenue, or their desire to avoid unpleasant consequences arising from the expression of grievances by those outside the circle of citizens who wanted to be let in (Manicas 1989; Hanagan and Tilly 1999.) As national states matured, the stratification that had characterized traditional citizenship was eroded, usually through contestation and sometimes by violent conflict.

Even in the traditional mode, it mattered less what or who the boundaries of privilege encompassed or how they were constituted than that they demarcated inside from outside. As Karl Deutsch showed 50 years ago (1954, Chap. 1), over the course of two and a half millennia changes in the size and form of the state were accompanied by changes in the forms and practices of membership in it. That, in turn, led to adaptations in ways of thinking about what made a given form of the state "natural" and in the normative justifications for buttressing those views. The city-state, multi-state civilization, empire, feudal fiefdom, absolutist state, and modern national state each seemed not only the natural, but the only sensible—if not the only imaginable—setting for citizenship. Each form of the state produced a set of normatively appropriate identitive, social, cultural, and legal statuses and roles.

Most people in independent countries had gained at least nominal citizenship by the middle of the last century; and by the mid-1970s virtually everyone virtually everywhere had become citizens of a state.[4] This spread of legal, nominal citizenship—akin to what British sociologist T. H. Marshall came to term civic citizenship ([1950] 1964)—within and across countries was the culmination of centuries of social and political change (cf. Manicas 1989). It followed from both endogenous, independent efforts within countries and, especially in the non-western world, from cross-border diffusion. And it became the point of departure for the construction of modern citizenship.

Modern citizenship, and modern citizenship studies, date from the end of World War II.[5] Marshall ([1950] 1964) argued that the prevalent view of citizenship at mid-20th century as a set of civil rights and obligations was excessively narrow and formalistic. He viewed the gulf between social classes in Britain as an impediment to the effective practice of such civic citizenship. The normative thrust of modern citizenship brought the creation and extension of social programs; the effective enfranchisement of virtually all holders of nominal citizenship;[6] and efforts to expand the reach of education, social security, and health care. In Northern and Eastern Europe, real or pretend programs were undertaken to reduce inequalities in income and wealth under the banner of economic democracy.

The turn to social and economic aspects of citizenship in the post-World War II period was only partly the consequence of the generalization of traditional citizenship. An important, commonly overlooked, factor for most democracies and the countries in Eastern Europe aligned with the Soviet Union was the turn from military security to economic and social security as the *raison-d'être* of the state.[7] The creation of the Cold War blocs, each anchored by a nuclear superpower and balanced by mutual assured destruction, vitiated the classic, conventional, view that the provision of military security was a—perhaps *the*—defining function of the state (King 1973; Rose 1976) and the bond that cemented citizens' relationships with it and with each other. Reliance for security on nuclear deterrence controlled by others called for new justifications for the state and its claims on its citizens; and most European states, Canada, Australia, New Zealand, Japan, and a small number of other countries (Costa Rica comes to mind most readily) turned to the provision of social programs for such justification.

Les 30 glorieux, the rapid and sustained economic growth in the post-war decades, ushered in the post-modern stage of citizenship. It generated a sense of material well-being in much of the industrialized world, leading some to project a "culture shift" toward a post-materialist era in which psychological, cultural, and quality-of-life values would rise to the fore (see, most notably, Inglehart 1977; 1990). It was probably not a coincidence that a value shift occurred toward multiculturalism near the end of that period of economic optimism, ushering in what I term here the post-modern stage of citizenship.[8] The recognition of group-based claims to end discrimination and for genuine, not just nominal, equality; the continuing shift toward rights rhetoric and away from obligations in citizenship practice and theory (Janowitz 1980); the rethinking of long-held notions about assimilation (B. S. Heisler 1992); and the increasing significance of transnational migration as distinguished from traditional immigration (Heisler 1998/1999; 2001; Heisler and Heisler 1986) contributed to a growing emphasis on questions of authenticity, cultural integrity, and collective or group rights—and, most important, in my view, the legitimacy of multiple identities without a superordinate identity anchored in the state. These notions have become the focus of debates in industrialized democracies about "who we are" and who we ought to strive to be.[9]

Then and Now, Here and There

It is easy to see why scholarly attention has increasingly focused on this "evolving" story. It is readily researchable, both in the historical record and through empirical, quantifiable, data relevant for the study of the behavioral (e.g., voting, participation, attitudinal) and distributional (i.e., equality/inequality) aspects of modern citizenship. From the vantage point of theory, discussions of rights and obligations, active versus passive citizenship, the roles of the state and civil society, and, most important, the markers of liberal, republican, or democratic norms permit coherence and scholarly dialogue. This is one explanation for limiting this symposium almost entirely to the world of substantially developed, relatively stable, law-based countries—and often to the democratic, liberal (usually republican) West.

Citizenship here and now—or, viewed in the developmental perspective, here in the past, as well as now—is not citizenship in the entire world or in general, however. To be sure, it is difficult, and sometimes impossible, to investigate the distance between the legal foundations of citizenship and citizenship practice; opportunities for meaningful political participation; the leveling of the functioning of civil society; access to education; or economic distribution in the parts of the world outside the frames of reference of most studies of citizenship. But ignoring what is likely a large majority of the world's countries and probably a majority

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of its population has profound theoretical, policy, and especially normative or ethical implications.

The essays in this symposium exemplify the recognition of the growing importance of developments beyond state boundaries for the theoretical understanding of citizenship today and in the foreseeable future. The rise of transnational communities, the proliferation of multiple citizenship, supranational and local government-sited rights regimes, the progressive incorporation of international laws and human rights norms into national jurisprudence, and other elements of globalization are directing our gaze across state borders.

It is not surprising that these challenges stand out in the concerns of leading students of citizenship. The principles of universal citizenship have been established in mature democracies. While civil liberties and opportunities for participation cannot be taken for granted anywhere, the institutionalization of the legal and philosophical foundations for full citizenship make it tempting to treat shortfalls as mere shortfalls in implementation. The main task, according to most of us working on the subject, is the extension of at least large portions of, if not all, rights enjoyed by citizens to those who enter the domain of the democratic state. These are immigrants, transnational migrants, asylum seekers, and refugees.[10]

By concentrating on the unfolding of citizenship and related rights regimes in liberal democracies, are we saying that the circumstances of people in other—in most—parts of the world are irrelevant or less relevant for citizenship theory? To be sure, human rights movements and theory, foreign relations and inter- and non-governmental organizations do concern themselves with their civil, economic, and social rights. But should we compartmentalize citizenship and humanitarian concerns? Even if that is a useful division of labor in the realm of action, is it appropriate in the realm of theory? A clear answer eludes me.

Liberal Conundrums

And what is the normative or intellectual ethical stance of theory that assumes, often *a priori*, the exportability—the universal validity—of the practices and supporting justifications of the trajectory of citizenship in the West? Is it the hope that people in non-democratic regimes, in greatly stressed or failing states, and in cultures that do not place high (or any) priority on particular individual or human or group rights will eventually "become more like us?" We run at least three risks: the pitfalls of historicism; the arrogance of value imperialism; and the nearsightedness of looking through or past the state but not below it (Pul 2005).[11]

It is important to avoid historicism when speaking of stages of citizenship. Citizenship in the West did not follow an inexorable path. The sort of developmental trajectory suggested by the classic historical narrative of progressive expansion of the body of citizens (e.g., Manicas 1989) should elicit skepticism in the light of massive reversals of citizenship status in the Third Reich, the treatment of native-born and naturalized American citizens of Japanese descent in the 1940s, and the more recent classification of some citizens as "enemy combatants." Nonetheless, changes that are politically, legally, and normatively embedded do matter. While, in light of the examples just noted, it would be foolhardy to speak of path dependence, embedding expectations and entitlements about rights and obligations has political as well as legal consequences, most clearly in democracies. They affect societies' self-concepts and, in time, become parts of what Rogers Smith (2003) has called "stories of peoplehood." Reconciling violations of such expectations and entitlements with those self-concepts or stories of "who we are" is politically difficult—though clearly more so in mature democracies than in Orwellian totalitarian regimes (Heisler 2005).

Although there is no logically or empirically compelling reason to cast either of these perspectives into normative terms, they almost invariably are. It seems difficult to resist the notion that countries that have moved away from such traditional concerns as the assertion of the fundamental equality of citizens in law and political personhood and have become concerned with the material and social conditions of their populations, making the cultural integrity and dignity of minorities of various sorts public business, are "more evolved" than those in which large parts of the population are denied political and cultural rights and decent economic treatment.

I am not entirely successful in avoiding such a perspective. Nonetheless, it seems worthwhile to leave open for now the question of whether Western liberal, largely democratic, highly legalistic notions of citizenship must—or even can—serve as templates for citizenship everywhere. Such doubts are reinforced by a recollection of the horrors perpetrated on the road to the ideas and ideals of citizenship that might be offered for export. A non-exhaustive list includes slavery, genocide, cultural repression, and the systematic exclusion of women, minorities, and the poor. Were any of these factors in the development of our current notions of citizenship?

Finally, can the norms associated with liberal rights regimes be put in place democratically? How, if at all, should dominant cultural majorities be consulted regarding the hosting of immigrants, resident but perhaps transient foreigners, asylum seekers, or refugees? Public education and effective political leadership are likely to help, but will they suffice to achieve a welcome democratically? And, even if we do not focus on the ongoing constitution design efforts in Iraq, it is likely that the assurance of citizenship rights and opportunities for effective political participation will be difficult in an age when democracy is increasingly operationalized as an election or referendum. These final paragraphs are suggestions for possible work in the future. The essays presented here provide useful insights for such work.

Notes

1. Citizenship has become an exemplar of "conceptual stretching" and "the traveling problem" (Sartori 1970). Using it to refer to ever-more varied phenomena in contextually very different settings makes its meaning fuzzier and risks losing its theoretical, analytic, and even political utility.

2. There is an enormous, diverse, and still growing literature on this theme. Some works, selected to provide a partial background for the work of the contributors to this symposium, would include Bauböck (1994; 2003); Benhabib (2004); Carens (2000); Castles and Harding (2003); Heisler (1986; 2001); Heisler and Heisler (1991); Iredale, Hawksley, and Castles (2003); Jacobson (1996); Kastoryano (2000); Ong (1999; 2003); Sassen (1996); Schuck (2000); and Schuck and Smith (1985).

3. Several contributors to this symposium emphasize status considerations—i.e., discrimination—between natives and transnational migrants.

4. Or, with increasing frequency in recent decades, of more than one state, as Rainer Bauböck's article in this symposium shows.

5. A strong argument can be made that major wars accelerated the spread of citizenship, as well as the growth of the state. The American Civil War and World Wars I and II have been most often associated with such development. The literature linking the 13th, 14th, and 15th amendments to the U.S. Constitution is extensive. See, for instance, Peacock and Wiseman (1961) and Skocpol (1992).

6. Consider that it was only after World War II that women were enfranchised in such "old democracies" as Belgium and France, and not until the 1970s in federal elections in Switzerland (although they had the right to vote

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in the arguably more important cantonal and local elections). The Civil Rights Act of 1964 and the Voting Rights Act of 1965, as well as the one person-one vote decision of the Supreme Court, were instances of the extension of political citizenship to those who already possessed nominal, civic citizenship.

7. I have discussed this in detail elsewhere. (See, for instance, Heisler and Heisler 1991; Heisler and Layton-Henry 1993.)

8. Stephen Castles connects the advent of multiculturalism to citizenship issues in his essay.

9. For the United States, compare the late Robert Wiebe's *Who We Are* (2002) with Samuel Huntington's *Who Are We?* (2004). Consider also recent explicit challenges to the principles as well as day-to-day policies and practices of multiculturalism by mainstream politicians, opinion leaders, and large segments of publics in Australia, Canada, and the Netherlands—the countries that led the move toward multiculturalism. Debates about legal, but especially illegal, immigration in the United States, Britain, and elsewhere, as well as contention over such culturally loaded symbolic behavior in France and Belgium as the wearing of headscarves by Muslim schoolgirls, also show various forms and degrees of doubt about the implications of post-modern citizenship.

10. For an elegant and powerful statement, see Benhabib (2004).

11. Can we be certain that the most desired, not to say desirable, levels of citizenship will not rest in the clan, the tribe, the province, the ummah, or other sub- or non-state entity?

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SYMPOSIUM AUTHORS' BIOS

Rainer Bauböck is a senior researcher at the Austrian Academy of Sciences, Institute for European Integration Research, and teaches at Vienna University and Central European University, Budapest. His main interests are in political theory and the comparative politics of citizenship, migration, nationalism, and minority rights. He can be reached at rainer.baubock@oeaw.ac.at.

Seyla Benhabib is Eugene Meyer Professor of Political Science and Philosophy at Yale University and director of the program in Ethics, Politics and Economics. Her last book, from which much of this article is drawn, *The Rights of Others. Aliens, Residents and Citizens*, has won the APSA's 2005 Ralph Bunche award. She can be contacted at seyla.benhabib@yale.edu.

Stephen Castles is professor of Migration and Refugee Studies, and director of the Refugee Studies Centre at the University of Oxford. He has carried out research on migration and multicultural societies in Europe, Australia, and Asia for many years and is the author of many books on migration issues, including: *Immigrant Workers and Class Structure in Western Europe* (with Godula Kosack, London: Oxford University Press, 1973); *Citizenship and Migration: Globalization and the Politics of Belonging* (with Alastair Davidson, London: Macmillan, 2000); and *The Age of Migration: International Population Movements in the Modern World* (with Mark Miller, Basingstoke: Palgrave-Macmillan, third edition, 2003).

Martin O. Heisler is professor of government and politics at the University of Maryland. His main interests and principal publications have been in the comparative and international politics of migration, ethnic relations and security. Some of his publications related to the subject of this symposium include *From Foreign Workers to Settlers? Transnational Migration and the Emergence of New Minorities* (1986), co-editor and contributing author; "Citizenship--Old, New and Changing," (1991) co-author; "Contextualizing Global Migration" (1998/1999); "Now and Then, Here and There: Migration and the Transformation of Identities, Borders and Orders (2001)"; and "Changing Theory and Practice in International Relations" (2005). He invites comments at mheisler@gvpt.umd.edu.

Riva Kastoryano holds a degree in economics from the University of Paris-Sorbonne and a Ph.D. in sociology from the Ecole des Hautes Etudes en Sciences Sociales. She is the author of, most recently, *Civil Enculturation: Nation-State, School and Ethnic Difference in The Netherlands, Britain, Germany, and France,* (with Werner Schiffauer, Gerd Baumann, Steven Vertovec, eds.), (translation), forthcoming. She can be reached at kastoryano@ceri-sciences-po.org.

Aihwa Ong is professor of anthropology and of southeast Asian studies at the University of California, Berkeley. She is interested in theories and problems of globalization, sovereignty, and citizenship in contexts of emergence. Recent books include *Flexible Citizenship* (1999); *Buddha is Hiding: Refugees, Citizenship, the New America* (2003); *Global Assemblages: Technology, Politics, and Ethics as Anthropological Problems* (2004); and *Neoliberalism as Exception: Mutations in Citizenship and Sovereignty* (forthcoming).

Rogers M. Smith is the Christopher H. Browne Distinguished Professor and Chair of the University of Pennsylvania political science department. He is the author of *Stories of Peoplehood: The Politics and Morals of Political Membership* (Cambridge University Press, 2003) and *Civic Ideals: Conflicting Visions of Citizenship in U.S. History* (Yale University Press, 1997), among other works. E-mail rogerss@sas.upenn.edu.

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