

Multiculturalism and Immigration: A Contested Field in Cross-National Comparison

Ruud Koopmans

Department of Migration, Integration, Transnationalization, Wissenschaftszentrum Berlin für Sozialforschung (WZB), Reichpietschufer 50, 10785 Berlin, Germany;
email: ruud.koopmans@wzb.eu

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Abstract

This article reviews cross-national research on multicultural policies in relation to immigrants in the main European and Anglo-Saxon immigrant-receiving countries. It compares the policies themselves and reviews studies that evaluate their outcomes. The size of immigrant populations as well as their composition in terms of countries of origin, religion, and human capital are key to understanding why multiculturalism has fallen further from grace in Europe than in the classical immigrant-receiving countries of the United States, Canada, Australia, and New Zealand. In addition, religious rights are identified as the main source of controversy regarding multicultural rights; that Muslims make up a larger proportion of immigrants to Europe explains in part the more critical evaluation that multicultural policies receive there. The reviewed studies reveal a mixed picture regarding outcomes of multicultural policies, with little effect on socioeconomic integration, some positive effects on political integration, and negative impacts on sociocultural integration.

INTRODUCTION

In October 2010, German Chancellor Angela Merkel described “*Multikulti*” as a naive attempt “to live happily side by side, and be happy to be living with each other.” This approach, she continued, “has failed, and failed utterly” (Weaver 2010). Asked in a television interview what he thought of Merkel’s assessment of multiculturalism, French President Nicolas Sarkozy replied, “Yes, clearly, it is a failure” (Sarkozy 2011). In a 2011 speech, British Prime Minister David Cameron similarly said, “Under the doctrine of state multiculturalism we have encouraged different cultures to live separate lives, apart from each other and apart from the mainstream.”¹ Coming from the leaders of three countries known for their distinct approaches to immigrant integration, this agreement is remarkable. On closer inspection, however, they do not seem to be talking about exactly the same thing. Merkel does not use the word multiculturalism, but rather its German colloquial derivative *Multikulti*, which connotes a live-and-let-live attitude of celebrating diversity. Cameron, by contrast, refers to “state multiculturalism.” Sarkozy sees multiculturalism primarily as something alien to France: “Countries such as England and the United States, who thought they could develop this multiculturalism, which means community by community, have strengthened the extremists, and each one, forgetting that he belonged to a national community, developed defenses against the others. We want nothing of that” (Sarkozy 2011, author’s translation from the French).

The confusion about multiculturalism grows further if one considers the subsequent impassioned defense offered by Chris Bowen, the Australian Minister of Immigration and Citizenship: “I’m not afraid to use the word ‘multiculturalism,’” he said; “I’m proud of what it means to Australian life. . . . But it is a unique,

Australian multiculturalism, built differently to other models around the world.” The “genius of Australian multiculturalism,” he elaborated, consists of three elements: respect for traditional Australian values, an emphasis on citizenship, and political bipartisanship. According to Bowen, the critics actually propose what Australian multiculturalism has stood for all along: “When David Cameron really said he supports a ‘muscular liberalism,’ he was—I argue—also advocating a more Australian version of multiculturalism.”² If critics of multiculturalism can refer to very different things, and its supporters can claim that the critics actually advocate their particular brand of multiculturalism, we must agree with Stuart Hall (2001, p. 3) that it is “a diffuse, indeed maddeningly spongy and imprecise, discursive field: a train of false trails and misleading universals.”

The aim of this article is to review cross-national empirical research on multiculturalism and its outcomes, to clarify the stakes in multiculturalism debates, and to examine the reasons behind its fall from grace in some countries but not in others. Within the social sciences, discussions of multiculturalism have long been the preserve of political philosophers, who debated the necessity and legitimacy of extending the individual rights guaranteed in liberal democracies to group rights for cultural minorities. Normatively, multiculturalism refers to “an ideology that attaches positive value to cultural diversity, calls for the equal recognition of different cultural groups, and calls upon the state to support such groups in various ways” (Miller 2006, pp. 326–27). I do not review the extensive normative literature here but refer the reader to some key texts (Taylor 1994, Kymlicka 1995, Shapiro & Kymlicka 1997, Parekh 2006) as well as major normative criticisms (Okin 1999, Barry 2001). More recently, an empirical literature has emerged that

¹The full text of the speech is available at <http://www.number10.gov.uk/news/pms-speech-at-munich-security-conference>.

²The full text of the speech is available at <http://www.minister.immi.gov.au/media/cb/2011/cb159251.htm>.

tries to measure cross-national differences in multicultural policies and has begun to explore the difficult question of their outcomes. It is on this empirical literature that I focus in this review.

In doing so, I restrict the scope of this review in two important ways. First, I discuss multiculturalism only with regard to immigrants. Much of the philosophical debate on multiculturalism, and on the minority rights that have actually been granted, refers to nonmigrant national minorities and indigenous peoples. Multicultural approaches with regard to these groups have not been seriously called into question (Kymlicka 2012). Kymlicka (1995, pp. 95–98) has argued that, as natives of their ancestral homelands, these minorities can make stronger normative claims for special rights and protection of their cultures than can immigrants, who have (mostly) voluntarily chosen to move from their ancestral homelands. For similar reasons, I exclude the special situation of native blacks in the United States.

Second, I restrict myself to developed democracies that have been the targets of sizeable immigration flows since the 1970s or earlier; I do this because many issues surrounding multiculturalism arise only gradually. In the early stages of the settlement process, when residence is not yet secure, partners have not yet been brought over, few children have been born, group size is still modest, and group members have not yet begun to penetrate key public institutions (e.g., education, the police force, or politics), questions of cultural rights are not likely to be prominent on the agenda of immigrants. Likewise, societies need time to adjust and respond to the presence of new ethnic and religious groups. For these reasons I do not refer to countries such as Italy, Spain, Ireland, or Finland, which have only recently become immigration destinations, and focus, rather, on the classical immigration countries—the United States, Canada, Australia, and New Zealand—as well as on ten long-standing European immigration countries—Germany, France, the United Kingdom, the Netherlands,

Belgium, Switzerland, Austria, Sweden, Norway, and Denmark.

DEMOGRAPHIC MULTICULTURALISM

The most frequent distinction in the literature on multiculturalism is between descriptive and normative uses of the term (e.g., Barry 2001, Joppke 2004, Bloemraad et al. 2008). Descriptively, multiculturalism refers to the demographic fact that Western societies have become racially, ethnically, and religiously more diverse as a result of immigration. Most work on multiculturalism briefly mentions this descriptive dimension and quickly moves on to supposedly more important issues. This negligence is unwarranted, given that the degree and forms of demographic diversity can have important repercussions for the legitimacy and endurance of multicultural policies. Several authors have argued that the political leverage of immigrants as (potential) voters exerts pressure on the extension of rights to them (Ireland 1994, Freeman 1995, Soysal 1997). Therefore, we may expect multicultural policies and discourses to be more widespread in countries with large immigrant populations, especially when these countries make citizenship, and thereby voting rights, easily accessible to immigrants (for empirical confirmation, see Koopmans et al. 2012).

The first two columns of **Table 1** give a cross-national overview of the size of the immigrant population, as indicated by the percentage of foreign-born. Immigrant populations make up a larger share of the population in the classical immigrant-receiving countries than in Europe, although the United States is, in some respects, an exception. As a result, a large proportion of the electorates of these countries consists of immigrants. In Australia, for instance, 24% of the population are first-generation immigrants, 68% of whom hold Australian citizenship (Smith et al. 2010, p. 10). Another 20% consists of second-generation immigrants (Khoo et al. 2002, p. 9), i.e.,

Table 1 Population shares of immigrants and of Muslims, 2010^a

Country	Population share of foreign-born ^b	Country	Population share of Muslims (including native-born) ^c
Australia	23.9%	France	7.5%
Switzerland	23.2	Belgium	6.0
New Zealand	22.4	Switzerland	5.7
Canada	19.8	Austria	5.7
Austria	15.2	The Netherlands	5.5
Sweden	14.3	Germany	5.0
Belgium	13.9	Sweden	4.9
United States	12.9	United Kingdom	4.6
Germany	12.0	Denmark	4.1
United Kingdom	11.3	Norway	3.0
The Netherlands	11.1	Canada	2.8
France	11.1	Australia	1.9
Norway	10.8	New Zealand	0.9
Denmark	9.0	United States	0.8

^aThe classical immigrant-receiving countries—the United States, Canada, Australia, and New Zealand—are indicated in bold.

^bFigures are based on data from Vasileva (2011), except those for New Zealand, the United States, Australia, Canada and Switzerland, which are taken from the Migration Information Source (see <http://www.migrationinformation.org>) and those for Belgium, which are based on OECD (2012, pp. 214–15) data. The Australian figure refers to 2006, and the Belgium one to 2009.

^cThe figures refer to 2010 data and are drawn from Pew Research Center (2011b). On the basis of a variety of other sources, Laurence (2012, p. 3) arrives at very similar figures for European countries.

people with at least one immigrant parent. In sum, more than one-third of the Australian electorate has immediate immigrant roots. Of course, using a somewhat longer time frame, virtually every Australian can be traced back, often within the living memory of grandparents or great grandparents, to immigrant ancestors. Given the role of immigrant electorates as driving forces behind the granting of rights to immigrants, it is no surprise that multicultural policies and discourses have traditionally found stronger support in the classical receiving countries than in Europe. In Europe, immigrant electorates are considerably smaller in size, not only because of the generally smaller numbers of immigrants, but sometimes also because of restrictive citizenship regimes (Howard 2009). The latter factor plays an important role in the three German-speaking countries, Germany, Austria, and Switzerland.

Koopmans et al. (2012, p. 1221) estimate that in European immigration countries, first- and second-generation immigrants make up no more than between 3% (Germany) and 12% (Switzerland) of the national electorate.

Although immigrants share an interest in obtaining individual citizenship rights and equal treatment, not all groups are equally prone to making claims for cultural rights. Certain general cultural rights, such as immigrant language classes in schools, may find support among most groups. Many claims for cultural rights are group-specific, however, such as those related to food and clothing or the regulation of relations between the sexes. Such claims are especially likely to be made by groups with a religion that deviates from that of the host society. Religious rights claims tend to be more difficult to accommodate than ethnic claims because they are not just about customs

but are often seen as sacred duties that cannot be compromised. Koopmans et al. (2005, p. 153) have shown that, during the 1990s, 60–80% of immigrant claims for cultural rights in France, Britain, and the Netherlands were made by non-Christian religious groups. This empirical predominance of religious rights claims stands in remarkable contrast to the predominant focus on ethnolinguistic rather than religious groups in the philosophical literature on multiculturalism, which has been noted, among others, by Modood (2000, p. 187ff.; for an exception, see Bader 2007).

Koopmans et al. (2005) found small numbers of claims by Hindus and Jews, but the overwhelming majority of religious rights claims were made by Muslims. This is a result in part of the large number of Muslims in European countries. However, the contrast between Hindus and Muslims in the United Kingdom suggests that this is probably not the whole story: Although there are, according to the 2001 census, approximately three times more Muslims than Hindus in the United Kingdom, the number of rights claims by Muslims exceeds those by Hindus by far more (61% versus 2% of all cultural rights claims; Koopmans et al. 2005, p. 153). Equally remarkable, there were virtually no religious rights claims by Southeast Asian religious groups such as Buddhists or followers of Taoism and Confucianism, despite the considerable presence of immigrants from this region, e.g., Vietnamese in France or Chinese in the United Kingdom. Whether this unique salience of Muslim claims for religious rights is due to the demands that this religion makes on the behavior of its members in the public sphere, to the current global mobilization of Islamic revivalism, particular barriers faced by Islam in Western societies, or to a combination of these factors is beyond the scope of this review.

Regardless of the answer, the size of the Muslim community is an important aspect of cultural diversity that needs to be taken into account when comparing multiculturalism across countries. **Table 1** illustrates striking contrasts in the rank orders of foreign-born and

Muslim populations among different countries. The classical immigrant-receiving countries are now clustered at the bottom right of the table, with percentages of Muslim populations ranging from 0.8% (United States) to 2.8% (Canada). All European immigration countries have larger Muslim populations; percentages range from 3.0% (Norway) to 7.5% (France). This alludes to another reason why the debate about multiculturalism is so different in Europe: The immigrant group that is by far the most likely to make claims for multicultural rights is much larger in European countries.

MULTICULTURAL POLICIES

In the most general and thin sense, any policy that positively evaluates cultural diversity or promotes immigration may be classified as multicultural (for a critical evaluation, see Banting et al. 2006, pp. 56–58). However, the literature contains broad consensus that for multicultural policies to be meaningful, they must go beyond a mere rhetorical celebration of diversity or general pro-immigrant stance and actually grant minority groups the kind of group-differentiated rights that the political philosophy of multiculturalism advocates. Wright & Bloemraad (2012, p. 78), for instance, define multicultural policies as “specific government policies designed to positively recognize diversity and help minorities maintain cultural and religious practices while integrating them into public life” (similarly, see Vertovec & Wessendorf 2010). Importantly, this excludes many other policies that are meant to extend rights to, and enhance the participation of, immigrant minorities. Examples of the latter types of policies are citizenship acquisition and antidiscrimination policies, which are “directed at ensuring the effective exercise of the common rights of citizenship, and so do not really qualify as group-differentiated rights” (Kymlicka 1995, p. 31), even though in several countries they are labeled as multicultural policies.

Multicultural policies can take many forms, including exemptions from existing rules and obligations, state support for separate

institutions, special facilities in mainstream institutions such as schools and the media, representation rights for ethnic and religious organizations, as well as affirmative action programs. Importantly, such a definition of multicultural policies is independent of whether politicians choose to call their policies multicultural. As has been noted by many observers now (e.g., Vertovec & Wessendorf 2010, Kymlicka 2012), several of the countries that have distanced themselves rhetorically from multiculturalism continue to practice a variety of multicultural policies as defined above. What is less noted is that, conversely, much of what passes under the banner of multiculturalism in the classical immigrant-receiving countries has little to do with multicultural policies as properly defined. This is evidenced by the above-quoted ode to multiculturalism by Chris Bowen, who has more to say about the duty of immigrants to respect Australian values than about their differential rights as ethnic and religious groups.

Two large research projects have in recent years collected systematic data on multicultural policies. The first is the Multiculturalism Policy Index (MPI), which covers 21 countries (the 14 countries reviewed here, plus Spain, Italy, Portugal, Greece, Ireland, Finland, and Japan). The first version provided broad measures for the period 1980–2000 (Banting et al. 2006), but it has since been refined and expanded to include three specific points in time: 1980, 2000, and 2010.³ The MPI scores each country for each time point at three levels (0; 0.5; or 1, with 1 indicating the most multicultural policies), depending on the extent to which it has implemented the following eight policies:

1. Constitutional, legislative, or parliamentary affirmation of multiculturalism.
2. The adoption of multiculturalism in school curriculums.
3. The inclusion of ethnic representation/sensitivity in the mandating of public media or media licensing.

4. Exemptions from dress codes, Sunday-closing legislation, etc.
5. Allowing dual citizenship.
6. The funding of ethnic group organizations to support cultural activities.
7. The funding of bilingual education or mother-tongue instruction.
8. Affirmative action for disadvantaged immigrant groups.

The second project, Indicators of Citizenship Rights for Immigrants (ICRI), originally covered five countries (Koopmans et al. 2005), was expanded to ten European countries (Koopmans et al. 2012), and now also covers the four classical non-European immigration countries.⁴ The ICRI includes policies regarding immigrants along two dimensions, the first pertaining to individual equal rights, which do not concern us here, and the second referring to differential cultural rights. The cultural rights dimension is composed of a total of 23 indicators, each scored on a five-point scale (–1; –0.5; 0; 0.5; and 1, with 1 indicating the most multicultural policies) for four points in time (1980, 1990, 2002, and 2008), and divided into five broad categories:

1. The absence of cultural assimilation requirements for access to rights: i.e., immigrants may retain dual nationality; there are no language and cultural requirements for accessing citizenship, permanent residence, or bringing a spouse over from abroad.
2. Accommodation of (Islamic) religious practices outside of public institutions: allowance of the public call to prayer, proliferation of purpose-built mosques,⁵ provisions for Muslim burials, proliferation of Muslim cemeteries, and allowance of animal slaughter according to the Islamic rite.

⁴The ICRI can be accessed at <http://www.wzb.eu/en/research/migration-and-diversity/migration-and-integration/projects/citizenship-rights-for-immigrants>.

⁵The indicators on proliferation of Islamic institutions (mosques, cemeteries, and schools) are calculated on a per capita basis for the Muslim population of a country.

³The MPI can be accessed at <http://www.queensu.ca/mcp>.

3. Cultural rights and provisions in public institutions: mother-tongue education in state schools; proliferation of state-funded Islamic schools; Islamic religious classes in public schools; the right of pupils and teachers to wear a headscarf; public broadcasting programs in immigrant languages; Islamic religious broadcasting as part of public broadcasting; and Muslim chaplains in prisons and in the military.
4. Political representation rights: immigrant consultative bodies on the national and local levels and consultative bodies for Muslims.
5. Affirmative action policies: binding quota and preferential hiring in favor of ethnic or religious groups of immigrant origin.

Three substantive differences between the two indexes can be noted. First, the ICRI has a clearer focus on rights and their implementation. The first two indicators of the MPI—affirmation of multiculturalism and its adoption in school programs—are more about the declaratory celebration of diversity than about enforceable group rights. As such, they are sensitive to whether or not a particular polity or educational authority declares itself to be multicultural, which does not necessarily say much about cultural group rights. Second, the MPI reflects the generally low salience of religious group rights claims in the philosophical debate on multiculturalism: Only one of the eight indicators (the one about exemptions from dress codes and Sunday closure) is about religious rights. In the ICRI, by contrast, religious rights are strongly represented, with 14 out of 23 indicators referring to religious rights for Muslims (Muslims were chosen for comparative purposes because in most countries Islam is the most prominent non-Christian immigrant religion and is the only one present in sufficient numbers in all Western receiving countries). Third, the MPI includes only proactive multicultural policies, whereas the ICRI also includes the absence of assimilatory barriers for access to rights. Such barriers may take the form of language requirements, civic knowledge tests, loy-

alty oaths, or requirements of cultural and social assimilation. Still, the two indexes are highly correlated ($r = 0.81$; see Koopmans et al. 2012, p. 1219),⁶ suggesting that by and large they measure the same underlying construct.

Both indexes indicate a steady increase in the prevalence of multicultural policies from 1980 until the end of the twentieth century. The MPI indicates that in most countries levels of multicultural policies increased during this period, whereas in a few (Norway and the United States) they remained stable. The ICRI similarly shows increases in multicultural policies in all but one country (Denmark), where they remained stable. Both indexes provide evidence of divergence since the turn of the century, however. According to the MPI, six countries have continued to expand multicultural policies (Austria, Belgium, Germany, New Zealand, Norway, and Sweden), but there are now also two countries that have moved away from multiculturalism (Denmark and the Netherlands), while the remaining six have stagnated. The ICRI shows four countries in which multicultural policies have declined (Austria, Germany, the Netherlands, and Switzerland) and six that have continued to expand multicultural policies (Belgium, Canada, France, New Zealand, Sweden, and the United States); however, as in the MPI, these increases have been modest in size. The two indexes show similar recent trends, except for Austria and Germany. This is because the MPI does not include the civic integration requirements, which I discuss in more detail below. Overall, however, both indexes show that the expansion of multicultural policies has halted in the early twenty-first century: Average MPI scores doubled from 1.8 to 3.5 between 1980 and 2000, but then remained largely stable at 3.8 in 2010. ICRI scores increased from -0.22 to $+0.08$ between 1980 and 2002, and then stabilized at $+0.10$ in 2008. In both cases, this stabilization has

⁶This correlation is based on ten European countries but remains virtually unaltered (0.82 , $p < 0.001$) when the four classical receiving countries are added.

Table 2 Multicultural policies, 2008–2010^a

Country	MPI 2010 (0 to 8)	Country	ICRI 2008 (–1 to 1)
Australia	8	Sweden	0.44
Canada	7.5	The Netherlands	0.42
Sweden	7	Australia	0.40
Belgium	5.5	United Kingdom	0.40
New Zealand	5.5	Canada	0.32
United Kingdom	5.5	New Zealand	0.21
Norway	3.5	Belgium	0.15
United States	3	United States	0.14
Germany	2.5	Norway	–0.04
France	2	Austria	–0.08
The Netherlands	2	Germany	–0.14
Austria	1.5	Denmark	–0.20
Switzerland	1	France	–0.28
Denmark	0	Switzerland	–0.40
Average	3.9	Average	0.10

^aAbbreviations: ICRI, Indicators of Citizenship Rights for Immigrants; MPI, Multiculturalism Policy Index.

occurred around the midpoint of the two scales, suggesting a consolidation at moderate levels of multicultural policies, albeit with important cross-national variation in both directions.

I now take a closer look at the most current cross-national differences, as shown in the first two columns of **Table 2** for the MPI and in the last two columns for the ICRI. Both indexes indicate Australia, Canada, and Sweden as countries with strong multicultural policies and Denmark, Switzerland, France, and Germany as countries with weak multicultural policies. The United States, New Zealand, Norway, and Belgium occupy intermediary positions on both indexes. However, the Netherlands, and to a lesser extent the United Kingdom and Austria, score higher on the ICRI. At the same time, France, and to a lesser extent Switzerland and Belgium, score lower on the ICRI than on the MPI.

Religious Rights

The divergent country rankings just described are related to the greater weight that the ICRI gives to religious rights relative to ethnic rights.

There is a growing literature on the accommodation of immigrant religions, and of Islam in particular. Some authors have, in a similar way as political philosophers of multiculturalism, sought to define normatively preferred ways of dealing with minority religions (Bader 2007). Most studies on the topic, however, take an empirical perspective and point at cross-nationally divergent practices and normative understandings regarding state-church relations and how to accommodate immigrant religions within them. In line with the predominance of Islam as the most prominent immigrant religion in most countries,⁷ cross-national studies on immigrant religious rights focus on the incorporation of Islam, particularly in European countries (an exception is Bramadat & Koenig 2009).

These studies show that the ways in which conflicts between the state and Christian churches have historically been resolved,

⁷This is true for all European immigration countries, as well as for Canada. In the United States and Australia, Islam and Buddhism are the two most prominent immigrant religions, with roughly comparable numbers. Only in New Zealand are Muslims less numerous than Buddhists and Hindus.

institutionalized, and normatively justified define opportunity structures that shape, though not fully predetermine, the degree and forms in which countries have been willing and able to grant rights to Muslims (Rath et al. 1999, Ewing 2000, Fetzer & Soper 2005, Klausen 2005, Koenig 2005, Tatari 2009). Others have pointed out that despite these different institutional settings, European governments have pragmatically converged in some domains, for instance where the establishment of advisory councils of Muslim representatives, regulations for halal food, or mosque construction are concerned (Maussen 2009, Laurence 2012).

France is considered the prototype of a country with an ideology of secularism, denoted by the concept of *laïcité*, which has given rise to a form of state-church separation in which there is little place for religion in public institutions (Koenig 2005). Civil servants are not supposed to display their religiosity in the workplace, and separate institutions for religious groups—such as confessional schools—are regarded with suspicion. France’s two partly francophone neighbors, Switzerland and Belgium, have been influenced by French *laïcité*, exemplified by a reluctance to tolerate displays of religiosity such as headscarves in public institutions (see Shadid & van Koningsveld 2005, Pfaff-Czarnecka 2009).

By contrast, countries with an official state church—such as the United Kingdom and the Scandinavian countries—have historically privileged one particular branch of Christianity. However, the precedent of religious rights granted to one group may offer conducive opportunities to Muslims if the state, for pragmatic reasons or because of a commitment to equal treatment, is willing to grant other religions similar rights. As Fetzer & Soper (2005, p. 5) point out, this has been the case in the United Kingdom, where Muslim leaders have generally been opposed to the disestablishment of the Church of England because they fear that the alternative would be a French-style secularism that would disadvantage all religions, including Islam.

Germany exemplifies yet another model, in which there is no single state church, but state recognition can be granted to several religious denominations (Koenig 2005). Even more so than a single state-church system, such a regime of state-church relations can provide a conducive opportunity structure for rights claims by Muslims, but only if the state is willing to grant Islam the recognition that it has given Christian and Jewish denominations. So far, Germany has not extended public corporation status to Islam, although a few federal states have recently taken small steps in this direction. Austria, by contrast, has granted Islam full public corporation status—a legacy that goes back to the days of the Austro-Hungarian Empire, when Austria ruled large Muslim populations in the Balkans (Dolezal et al. 2010).

The Netherlands, finally, has institutionalized state-church relations in a way that contrasts most with France. There is no system for state recognition of churches, but neither is the state committed to a secular public sphere. Dutch state-church relations have been shaped by the system of pillarization (Lijphart 1968), which was established in the early twentieth century as a compromise between various confessional groups and seculars. In contrast to French *laïcité*, state-church separation was defined here as noninterference of the state in religious self-governance, which was broadly defined to include religious schools, hospitals, cultural and welfare institutions, and a range of other sectors. The compromise also entailed full state funding—on an equal basis for all denominations—for these sectors. Because there is no barrier of state recognition, it has been relatively easy for Muslim groups to claim many of the rights that had been historically granted to Christian denominations, and the state has been reluctant to set boundaries for the expression of Muslim religiosity in public institutions (Rath et al. 1999, Shadid & van Koningsveld 2005).

Table 3, where countries are ranked according to the average scores on the indicators of religious rights in the ICRI index, shows how these different opportunity structures have

Table 3 Religious rights for Muslims, 2008

Country	ICRI (–1 to 1)
The Netherlands	0.79
United Kingdom	0.64
Canada	0.45
Australia	0.34
Austria	0.29
Sweden	0.25
New Zealand	0.23
Belgium	0.04
United States	–0.03
Denmark	–0.07
Norway	–0.07
Germany	–0.11
France	–0.25
Switzerland	–0.50
Average	0.14

affected religious group rights for Muslims (see Carol & Koopmans 2013).⁸ The Netherlands scores highest, followed by the United Kingdom, whereas France and Switzerland score particularly low. Belgium also scores lower compared with the MPI, as does the United States, which, like France, is wary of state support and recognition for religious organizations and activities but is characterized by a “passive” rather than “assertive” secularism that tolerates the public visibility of individual expressions of religion in most state institutions (Kuru 2007). Even self-proclaimed multicultural Canada has been noticeably more reluctant when it comes to granting religious rather than ethnic rights. In 2006, Ontario

⁸Fox (2008) provides the most comprehensive account of state policies regarding religion. Many of his indicators deal with the state’s relationship to majority religions, however. His index of “restrictions on religious minorities” comes closest to the kind of rights that the ICRI index measures. However, Fox’s measure is a summary across all minority religions and is, for instance, affected by restrictions regarding Scientology that are of limited relevance for immigrant religious rights. Nevertheless, Fox’s index broadly concurs with the data on Muslim rights presented here, as it, too, identifies Germany, Switzerland, and France as the Western democracies with the greatest restrictions on minority religions (Fox 2008, p. 114).

outlawed faith-based arbitration in family matters after a Muslim association announced that it wanted to open a sharia court, based on the 1991 Provincial Arbitration Act. Moreover, although in several provinces Catholic and Protestant schools receive public funding, this right has not been granted to other faiths.

Civic Integration and Assimilation Requirements

Authors who proclaim “the retreat of multiculturalism” (Joppke 2004) or “the return of assimilation” (Brubaker 2001) note that this change in policy is less a question of discarding old policies than of supplementing them with new civic integration programs (Joppke 2007). These programs include host-country language courses for immigrants, sometimes supplemented by instruction in national politics, history, and culture, and the introduction of citizenship ceremonies and loyalty oaths. In some cases, these measures are voluntary, but in others they are a prerequisite for the acquisition of citizenship and sometimes also for permanent residence and the right of entry for marriage partners. Goodman (2010) has developed an index for 15 European Union (EU) countries that takes into account both the extent and the compulsory nature of civic integration programs. The index shows that Germany, Denmark, Austria, the Netherlands, and the United Kingdom have the most extensive civic integration requirements, whereas Belgium and Sweden have hardly any at all.

Two things are noteworthy about these programs. First, they do not entail a return to previous notions of ethnocultural assimilation of the type that existed, for instance, in pre-2000 German naturalization rules, which stipulated that citizenship candidates needed to demonstrate an “orientation toward German culture.” As Michalowski (2011) has shown in her content analysis of citizenship tests in Germany, Austria, the Netherlands, the United Kingdom, and the United States, the knowledge that is required of immigrants is of a civic (political institutions, major laws,

key historical facts) or practical (e.g., how does the health care system work) nature and does not—with the exception of some of the questions asked in the Netherlands—extend to sociocultural norms. Second, many elements of European civic integration programs have been for decades part of citizenship and immigration policies in classical immigration countries. This is true for language and civic knowledge tests as a requirement for access to citizenship, for loyalty oaths, and, in Canada, for preferential immigration rights for English and French speakers. The reinvention of such policies in Europe can perhaps best be seen as a corrective to the overzealous discarding of requirements for access to rights during the 1980s and 1990s in countries such as the Netherlands and the United Kingdom or as a civic replacement for previous ethnic assimilation requirements in countries such as Germany.

MULTICULTURAL POLICY OUTCOMES

The most difficult empirical question surrounding multiculturalism concerns its outcomes. There is certainly a wide gap between the available empirical evidence and the sweeping statements made in the public debate, both by critics who proclaim its “failure” and by proponents who praise “the genius of Australian multiculturalism” or “the Canadian success story” (Kymlicka 2012, p. 10).

From the vantage point of the political philosophy of multiculturalism, multicultural policies that provide minorities with recognition of cultural differences and resources to maintain them appear to some extent as normative ends in themselves. Whether states have a normative obligation to recognize and support cultural minorities, and to what extent such an obligation extends to minorities of immigrant origin, is a matter of normative preference and as such not open to empirical adjudication. Critics of multiculturalism, likewise, have sometimes rejected it on purely normative grounds, arguing that group rights limit individual rights and are therefore fundamentally

unjust. This criticism has been raised especially with regard to the position of disadvantaged groups within minorities, such as women, homosexuals, ethnic subgroups, or religious dissenters (Okin 1999). According to this position, granting group rights to a minority is likely to benefit the dominant groups within it, who control its “representative” ethnic and religious organizations and have the power to define which aspects of the group’s culture qualify for state support and protection.⁹ Although difficult, it does not seem impossible to contribute to this normative dispute from an empirical point of view. If the critics are right, we should, for instance, find a greater frequency of attitudes and behaviors that sustain gender inequality within minority groups that live in countries with multicultural policies, especially if these include rights pertaining to cultural behaviors with a gender dimension. However, no such empirical studies have been undertaken.

Most proponents of multicultural policies have, however, made claims about outcomes that go beyond their inherent normative qualities. Greater social cohesion, on the one hand, and more socioeconomic equality between minorities and the majority, on the other, are the most important of these purported positive impacts of multicultural policies. These objectives, rather than the prescriptions of normative philosophers, have often been at the root of multicultural policies, for instance in Canada, where they emerged at the end of the 1960s as part of a package to pacify the Quebec conflict (Froese-Stoddard 2012), or in the Netherlands, where they were implemented in the late 1970s after a wave of terrorism by members of the Moluccan minority group and were subsequently extended to other groups as a means to promote socioeconomic equality (De Zwart 2012).

The critics of multiculturalism focus on the same outcome areas, arguing that multicultural

⁹An example of these tensions within minority groups is provided by Cohen’s (1999) study of the marginalization of black AIDS and HIV victims by some African American organizational leaders.

policies have not realized their promise but have instead bolstered extremism, promoted segregation, and widened the socioeconomic gap between minorities and the majority. This dispute obviously calls for thorough empirical investigation, and in recent years a growing number of studies have begun to take up the challenge. This is much more easily said than done, however, because there are two major obstacles to such analyses: the need to control for compositional effects and the difficulty of attributing destination country effects to multicultural policies.

Dealing with Compositional Effects

As I note above, there are major differences between the European and classical immigrant-receiving countries regarding the countries and regions of origin of immigrants, with immigration from Muslim countries in particular being much more prominent in Europe. This is relevant not only because Muslims are the most prominent source of group rights claims, but also because several studies show that even when controlling for individual background characteristics, Muslim immigrants perform worse in the labor market and in the education system than other minority groups (e.g., Van Tubergen 2004, Fleischmann & Dronkers 2010, Dronkers & de Heus 2013). Simply comparing integration outcomes of immigrants without controlling for the ethnic and religious composition of countries' immigrant populations will therefore lead to biased conclusions.

This is also true when one does not take into account a second important composition effect, namely that of human capital (education and labor market skills) differences. Here, too, there is important variation, especially between the European and classical immigration countries. On the basis of OECD statistics, Dustmann & Glitz (2011, pp. 8–9, 147) show that, among the foreign-born, 46% in Canada but only 17% in Germany hold a college degree or higher. Only 22% of the Canadian but 48% of the French foreign-born have less than a high school degree. The educational levels

of immigrants in Australia and the United States are almost as high as those in Canada. The United Kingdom is the only European country included in their comparison with an immigrant educational profile that comes close to those of the United States and Australia.¹⁰

Such cross-national human capital differences are also found within ethnic groups. For instance, of the Turkish foreign-born in the United States, only 14% have less than high school education, but in Austria the corresponding figure is 82% (Dustmann & Glitz 2011, p. 151). More generally, Muslim immigrants in Canada and the United States have educational profiles comparable to those of natives. According to the 2001 census, only 18% of Canadian Muslims have less than a high school degree, and 28% are college or university graduates, which contrasts starkly with the low education levels predominant among Europe's Muslim foreign-born.¹¹

Attributing Destination Country Effects to Multicultural Policies

The second major methodological problem after identifying a destination country effect is how to determine that it is due to differences in multicultural policies rather than some other factor that varies across countries. There are two important policies regarding immigrants that offer alternative explanations for cross-national differences. The first concerns the degree to which countries grant immigrants access to individual equal rights—by way of nondiscriminatory alien policies, easy access to citizenship, and effective antidiscrimination policies. It is difficult to distinguish the effects of such individual-equality policies from those of multicultural policies because the two are

¹⁰These data are mostly based on census data, which are likely to exclude many undocumented immigrants. This may lead to an overestimation of education levels in countries with many undocumented immigrants, such as the United States.

¹¹See <http://www.euro-islam.info/country-profiles/canada>. The Pew Research Center (2011a) reports similar figures for Muslims in the United States.

empirically correlated. For example, in the ICRI policy data, the strength of the correlation between the dimensions of individual equality and multicultural group rights is 0.64. Moreover, the distinction between individual and multicultural rights cuts through some policy areas, in particular citizenship legislation. Dual nationality and the absence of cultural assimilation requirements are multicultural elements of naturalization policies, but other aspects such as short residence requirements and *jus soli* acquisition for the second generation are individual rights that bear no relation to immigrants' cultural differences. Thus, effects of naturalization policies on some outcome measure cannot be taken as evidence for or against multicultural policy effects, unless these dimensions of naturalization policies are empirically distinguished.

Second, there are important cross-national variations in immigration policies. Here, too, we find an important contrast between the classical and European immigrant-receiving countries. Partly because of selective immigration policies, and partly because of their relative geographical distance from war- and poverty-ridden regions, the former have been able to select many of their immigrants on the basis of labor market demand (see, e.g., Borjas 1993, Green & Green 1995). Immigrants to Europe, by contrast, are predominantly lower skilled, which is partly a legacy of the active recruitment of low-skilled labor during the guest-worker period of the 1950s and 1960s, but is also a result of its developed welfare states and equal income distributions selectively attracting immigrants with lower levels of human capital (Borjas 1989). According to OECD data for the year 2003, 72% of immigrants who entered Canada and New Zealand and 61% of those who entered Australia and the United States belonged to one of the categories of "discretionary" immigration (work or settlement, nonimmediate family members, invited refugees), whereas in France, Sweden, and Switzerland, 83–96% of new immigrants were "nondiscretionary" (immediate family members, asylum seekers), i.e., belonged to

categories of immigrants whose entry cannot (or can hardly) be regulated or adapted to labor market demands (OECD 2006, pp. 117–18). Selective immigration policies are an important cause of the higher education levels of immigrants that we find in the classical immigration countries. However, their impact on integration outcomes may go beyond that, because countries with selective immigration regimes can select for particular skills and labor market sectors and can thereby promote successful integration of immigrants independent of formal levels of education (Green & Green 1995).

Depending on the type of outcome variable, other specific variables on the country-of-immigration level will need to be taken into account, such as welfare state regimes and labor market flexibility or differences in school systems. For quantitative analyses, this leads to the problem of too many variables and too few cases. If one sticks to a set of countries with at least roughly comparable immigration flows, one will not get far beyond the 14 countries that this review focuses on. One can extend the number of countries somewhat by including Southern and Eastern European countries, but only at the cost of importing new extraneous sources of variation (e.g., the short average duration of stay of immigrants or the influence of undocumented migration), which require additional variables that quickly eat away at the added statistical power that the extra cases buy. Carefully selected comparisons of a few country cases are therefore sometimes a preferable alternative. But this strategy, too, has to deal with the limited number of countries available for such comparisons. Within-country cross-sectional comparisons, especially in federal states, offer another alternative. If some regions have noticeably more or less multicultural policies than others (e.g., Flanders and Wallonia, or Quebec and Ontario), this may provide leverage for assessing policy effects while keeping many things constant that otherwise vary across countries. Longitudinal studies within countries that compare periods before and after important policy changes are another

attractive option. Neither type of within-country design has been thoroughly exploited.

Political Integration

With these methodological problems in mind, we can now take a look at some studies that have tried to isolate multicultural policy effects, starting with those that investigate political integration. At the meso level, Koopmans et al. (2005, pp. 128–31) showed that in Germany and Switzerland during the 1990s the mobilization of immigrants, even when one controls for ethnic origin, was strongly oriented toward countries of origin, whereas in France and the United Kingdom and, to a lesser extent, the Netherlands it focused on rights and integration in the receiving country. They found a similar pattern for participation of immigrants in media debates on integration and immigration issues, which ranged from 18% in the United Kingdom to 5% in Switzerland. These results point to strong impacts of integration policies on immigrant mobilization, with a major divide between Germany and Switzerland and the other three countries. This suggests that individual citizenship rights are decisive because, on this dimension, Germany and Switzerland are restrictive and the other three countries inclusive (Koopmans et al. 2005, p. 73). By contrast, France is similar to Germany and Switzerland in that it grants few multicultural rights, but this does not seem to have a noticeable impact on immigrant mobilization. Carol & Koopmans (2013) report similar results in their study of claims making on Muslim religious rights during the period 1999–2008. The strength of the voice of Muslims in these debates varied from approximately 20% in Germany and Switzerland to 40% in the United Kingdom and 46% in France, with Belgium and the Netherlands in between. Dolezal et al. (2010) find, however, that Muslims have a much stronger voice in public debates in Austria compared with Germany and Switzerland. That these countries have very similar individual citizenship regimes, but Austria extends

more religious rights to Muslims, suggests that cultural rights matter as well.

Carol & Koopmans's (2013) study also provides insights into the dynamics of claims making on Muslim rights. They show that media debates on Muslim rights have strongly increased since 2001. However, the rights that are debated in the United Kingdom and the Netherlands, the two countries where Muslims have been able to gain the most rights, differ starkly from those that are contested in other countries. In Germany, Switzerland, France, and Belgium, more than 90% of claims are about mainstream Muslim practices such as mosque construction, headscarves, Islamic burial, and halal slaughter. By contrast, in the Netherlands and the United Kingdom, most claims are about demands by orthodox minorities within Islam, such as full-face covering, sharia rules, abstention from interaction with the opposite sex, or the demand to ban and persecute depictions of the Prophet Mohammed or the Qur'an. These results, the authors argue, indicate a struggle over the limits of religious group rights, which in countries such as the United Kingdom and the Netherlands that have already granted mainstream Muslim rights has shifted to controversies over the demands of more orthodox factions within Islam.

On the individual level of analysis, Wright & Bloemraad (2012) investigated political integration across a range of European countries, as well as Canada and the United States. Their basic result is that levels of trust in and satisfaction with government, political interest, and political participation of immigrants covary strongly with those of natives of the respective countries, suggesting that immigrants assimilate to a national political culture, irrespective of specific immigrant rights policies. Only the evidence they cite on higher levels of trust among immigrants in Canada compared with the United States suggests a positive effect of multicultural policies on political integration in Canada.

In another study, Bloemraad (2006) investigated the remarkable difference in levels of citizenship acquisition between immigrants in the United States and Canada. She argues that

American immigration authorities are guided by an ethos of law enforcement and border control, whereas the Canadian authorities actively promote naturalization and offer language acquisition and settlement programs to immigrants, which also entail funding for ethnic organizations to assist immigrants, e.g., with translations and in finding employment. Although this seems perfectly convincing, it is less clear what Canadian multiculturalism adds to the equation. Active naturalization policies, language acquisition programs, and employment assistance are not per se multicultural policies. As indicated earlier, naturalization policies can encompass multicultural elements, such as dual nationality and absence of assimilation requirements, but this is not where the difference between the United States and Canada lies. Canada's naturalization policies may be more inviting, more proactive, and less constrained by security concerns, but none of this is related to multiculturalism as properly defined. France, for instance, has historically had high naturalization rates and *jus soli* access to citizenship for the second generation, but within a framework of cultural assimilation rather than multiculturalism (Brubaker 1992).

A few studies have related the strength of identification with the country of settlement to multicultural policies. Phinney et al.'s (2006) study of immigrant youth allows comparisons of specific ethnic groups, particularly of Vietnamese and Turks, across various countries. They find few differences in levels of identification, but those that do occur do not reflect multiculturalism as a positive factor. Vietnamese youth identify most with their country of settlement in France and the United States and least in Canada; Turks identify most with their country of residence in France and the Netherlands and least in Germany (Phinney et al. 2006, pp. 91–92). The latter finding is reproduced by Ersanilli (2010; see also Ersanilli & Koopmans 2011), who, as does Bloemraad (2006), uses a quasi-experimental design and focuses on a select group of Turkish immigrants from a few regions in Turkey who migrated in the 1960s and early 1970s as guest workers

to Germany, France, and the Netherlands. She finds that French and Dutch Turks have higher levels of national identification than German Turks but do not differ significantly from one another. Again, these findings, and those for decidedly nonmulticultural France in particular, point toward the importance of inclusive citizenship and individual rights rather than multicultural group rights.

Sociocultural Integration

Two sociocultural integration outcomes are of paramount importance: language acquisition and interethnic contacts. Language is the key to political participation, as well as to the educational system and employment (Van Tubergen et al. 2004). Interethnic contacts are a crucial source of social capital (Lancee 2012). Regarding language, Chiswick & Miller (1995) argue on the basis of Australian data that English language proficiency among immigrants declined after the introduction of minority language classes in schools. On the cross-national level, Phinney et al. (2006, pp. 93–94) report the highest national language proficiency among immigrant youth in the United Kingdom, France, and the United States and the lowest in Sweden and Norway, with the Netherlands, Germany, Australia, and Canada in between; this does not seem to fit any interpretation regarding positive or negative effects of multicultural policies. However, the results of Van Tubergen & Kalmijn's (2005) comparison of seven European countries, Australia, and the United States point in the same direction as Chiswick & Miller's (1995) observations for Australia. They find that a history of left-wing government incumbency reduces immigrants' host-country language proficiency, which they interpret as a result of the "linguistic-pluralism" integration policies that left-wing parties prefer, which reduce immigrants' incentives to learn the host language (Van Tubergen & Kalmijn 2005, p. 1449). Further support comes from Ersanilli's (2010) study. She finds that national language proficiency is lowest in the Netherlands and highest

in France, and national language use is higher in France than in the Netherlands and Germany (Ersanilli 2010, p. 60). Euwals et al. (2006), likewise, find that language proficiency is worse among Dutch than among German Turks.

Cross-national studies of immigrant interethnic contacts on the individual level of analysis are scarce. Phinney et al. (2006, pp. 94–95) do not find much cross-national difference at all in the amount of interethnic contacts among immigrant youth. Ersanilli (2010, p. 60) finds, however, that Turks in France have somewhat more interethnic contacts than those in Germany and the Netherlands. On the aggregate level, statistics on residential segregation of immigrants reveal stark cross-national differences. Musterd's (2005) and Koopmans's (2010) comparisons of European cities show much lower levels of segregation across a range of ethnic groups in Germany, Austria, Switzerland, and France—countries that all score low on multicultural policies—compared with the United Kingdom, Sweden, Belgium, and the Netherlands. Levels of immigrant segregation in the latter countries are similar to those in Canadian (Ray 1999) and US (Iceland & Scopilliti 2008) cities.

Socioeconomic Integration

Systematic cross-national comparisons of educational outcomes for the children of immigrants are still at an early stage, to an important extent because of data limitations (Heath et al. 2008). Dronkers & Fleischmann (2013) used the European Social Survey to analyze educational attainment among second-generation immigrants. When controlling for parental education and other individual background variables, they find that there are no significant gaps between immigrants' and natives' attained level of education, except for male immigrants from Islamic countries. The study does not include a measurement of multicultural policies, but inclusive naturalization policies affect immigrants' educational attainment positively. The most frequently used data set for cross-national research is the OECD's PISA (Programme

for International Student Assessment) study of educational performance of 15-year-old children. Unfortunately, for several countries that are crucial cases for a test of hypotheses about multicultural policies—Canada, the United States, France—there are no data on parents' countries of birth. Levels et al.'s (2008) analysis of 2003 PISA data finds no effect of left-wing government incumbency on mathematical performance of immigrant children. In a more recent study using 2006 PISA data, Dronkers & de Heus (2013) use Migrant Integration Policy Index (MIPEX; <http://www.mipex.eu>) data on integration policies—which cover access to nationality and other individual rights—to predict scientific literacy, but they find no effect. What does become clear from their analysis is that characteristics of educational systems, such as resource availability and early tracking, are important for understanding cross-national differences (see similarly Crul & Vermeulen 2003).

Regarding the labor market, several studies have investigated the better performance of immigrants in the classical immigrant-receiving countries. Heath (2007) compares levels of unemployment and access to skilled white-collar jobs among second-generation immigrants and concludes that the selectivity of immigration regimes of the classical receiving countries provides the most plausible reason behind the cross-national differences (Heath 2007, p. 686; see also Kalter & Granato 2010). Van Tubergen et al. (2004) find no difference in unemployment and labor force participation rates of the foreign-born between Canada and Australia, on the one hand, and European countries and the United States, on the other, once characteristics of the countries of origin such as GDP, religion, and political suppression are taken into account. Apparently, the advantage that Canada and Australia have regarding immigrant labor market participation is not due to their multicultural policies but is explained away fully by the ethnic and religious composition of their immigrant populations. In addition, they find a positive effect of left-wing government incumbency in the recent past.

To explain differences among European immigrant-receiving countries, Koopmans (2010, pp. 13–15) compares employment rates of non-EU immigrants and finds that the three German-speaking countries—Germany, Austria, and Switzerland—have the highest, and the Netherlands, Sweden, and Belgium the lowest, rates of immigrant labor market participation. He hypothesizes that the combination of strong welfare states and multicultural policies in the latter countries has lowered incentives to acquire the linguistic skills and interethnic contacts to be successful in the labor market. Kogan’s (2006) multivariate analysis confirms that flexible labor markets and weak welfare states raise the labor market participation rates of non-EU immigrants, but she does not investigate the role of multicultural policies. Studies across pairs of countries with similar welfare state regimes and labor market regulations, but contrasting immigrant integration policies, suggest that integration policies also play a role. Euwals et al. (2006) show that the labor market participation gap between natives and Turkish immigrants is much larger in the Netherlands than in Germany, and Kogan (2003) shows that employment levels of immigrants from the former Yugoslavia are higher in Austria than in Sweden. However, this pattern may hold only for the first generation, as Fleischmann & Dronkers (2010) do not find any effect of welfare state regimes or integration policies for second-generation immigrants across 13 European countries. However, they used MIPEX, which measures inclusive citizenship and equal opportunity rather than multicultural policies.

Social Trust and Support for the Welfare State

Especially on the left of the political spectrum, the idea of a “progressive dilemma” (e.g., Cupepus et al. 2003, Goodhart 2004) has taken hold, which identifies a tension between two progressive values: cultural diversity and social equality. According to this reasoning, which received empirical support in several widely noted studies (e.g., Alesina et al. 1999, Putnam 2007), eth-

nic diversity may lower mutual trust among citizens and reduce support for redistributive welfare state programs. Policy proposals based on this progressive dilemma were to make immigration policies more selective, to make welfare benefits not immediately available to new immigrants, and to strengthen the symbolic aspects of citizenship (Goodhart 2004, pp. 35–37). Although this analysis is not aimed directly at multicultural policies, it does raise the question of whether such policies aggravate or mitigate the eroding effects of diversity on solidarity.

In a cross-national analysis on the aggregate level, Banting et al. (2006, p. 79) find evidence of a negative effect of immigration on levels of social spending. However, multicultural policies have no significant additional effect. In the same volume, Crepaz (2006) analyzes generalized trust and finds a negative effect of the percentage of foreign-born but a positive impact of multicultural policies. Kesler & Bloemraad (2010) find, however, no effect of increases in immigration on generalized trust, regardless of whether countries have multicultural policies or not. None of these studies disentangles multicultural policies from individual citizenship policies. Therefore, it is not possible to tell whether the effects (or the absence thereof) of multicultural policies are spuriously affected by individual equal rights policies. Hooghe et al. (2007) make this distinction and find that, although there is no effect of multicultural policies, one of their two indicators of individual citizenship, voting rights for foreigners, does have a positive effect on generalized trust. Taken together, the evidence from these studies is tentative, but it does suggest that although the tension between diversity and solidarity may be real, multicultural policies do not seem to be a decisive factor in the equation.

DISCUSSION AND CONCLUSIONS

In summing up the results of studies of integration outcomes, a complex picture emerges. In many domains, immigrant integration policies do not seem to be of paramount importance.

Particularly in the structural domains of education and the labor market, traditional mechanisms of class inequality, as well as domain-specific institutions such as welfare state regimes, labor market regulations, and educational systems, have more explanatory power. The same seems to be true by and large for trust and solidarity. Although both seem to be negatively affected by cultural diversity, multicultural policies as such do not seem to have much of an effect, negatively or positively.

The effects of immigrant integration policies that do occur mostly point toward the importance of individual rights and equal opportunity. For instance, regarding political integration, immigrants identify more strongly with their countries of residence and are more involved in public debates in countries where individual citizenship rights are easily accessible to them. However, this is true as much for decidedly nonmulticultural France as for countries such as the United Kingdom and the Netherlands. Likewise, inclusive naturalization policies, as one study showed, were the only aspect of integration policies that had a positive impact on immigrants' educational performance. Indications for positive effects of multicultural policies per se were much rarer. The most convincing cases in point were in the domains of citizenship acquisition and trust in government. Naturalization rates are substantially higher in Canada compared with the United States, but here, too, more active naturalization policies, and not so much cultural group rights, seem to play a decisive role. Trust in government is also higher among immigrants in Canada compared with the United States, even after controlling for the fact that native Canadians also trust their government more.

Several studies pointed toward negative effects of multicultural policies, especially in the domain of sociocultural integration. Host-country language proficiency and usage tended to be lower in countries with stronger multicultural policies, although countries with exclusive citizenship policies also seem to perform poorly in this regard. Again, inclusive individual rights policies seem to be the most

important, but in this case multicultural policies may have been counterproductive. The one cross-national study of interethnic contacts that allowed conclusions about policy effects showed similar results. Moreover, aggregate statistics indicate that levels of ethnic residential segregation are very high in countries with multicultural policies. This suggests that there may be something to the criticism that these policies have encouraged social segregation.

Still, some argue that the evidence for negative effects of multicultural policies is so limited that the backlash against multiculturalism is merely a "crisis of perception" (Vertovec & Wessendorf 2010, p. 21). Certainly, the damage is not nearly as extensive as some of the critics have claimed or feared, and it seems to be largely limited to the domains of language and social segregation. These are important enough in their own right, however, and it is no coincidence that segregation has been at the core of the diagnosis of multiculturalism's problems and that host-country language acquisition is the key element among the civic integration policies that have been proposed as a solution. The results also suggest, however, that if host countries erect barriers to the acquisition of citizenship rights that are too high, such policies may themselves become counterproductive. Whatever may be wrong with multicultural policies, it is not that they are often combined with inclusive naturalization, antidiscrimination, and equal opportunity policies, which in many fields of integration do have positive effects. De-emphasizing cultural group rights and increasing emphasis on common citizenship will work only if citizenship remains truly accessible to all.

Why has multiculturalism fallen from grace in many European countries but not nearly as much in the classical immigration countries? Is it the "genius of Australian multiculturalism" or the "Canadian success story"? Looking at raw statistics on the performance of immigrants in these countries compared with immigrants in Europe, it is easy to believe in such lofty assessments. But the empirical results discussed in this review show that these differences

disappear once one controls for the much higher average levels of education and for the mix of countries of origin in the classical immigration countries, which differs strongly from the composition of immigrant populations in Europe. If there is a genius of Australian multiculturalism, it is found on Christmas Island and in other extraterritorial outposts that keep unwanted immigrants at bay. If there is a Canadian success story, it is the country's selective immigration policies, which have allowed Canada to attract foreign-born college graduates rather than unskilled peasants.

A factor, moreover, that has been given insufficient attention in the debate about multiculturalism, is religion. As we have seen, the largest and most controversial share of claims making on multicultural rights is about religious rights. The overwhelming majority of these claims, in turn, have been made by Muslims. This is crucial, because in Europe Muslims make up a much larger proportion of the immigrant population, as well as of the population at large, than in the classical immigrant-receiving countries. As a result, most people associate multiculturalism in Australia or Canada with limited language rights and symbolic celebration of diversity for a variety of ethnic groups. Moreover, much of the electorate belongs to the beneficiaries of these policies. In the European context, by contrast, multiculturalism has come to be associated with the comparatively large population of Muslims and the contestation around their religious rights, and it benefits only small sections of the electorate beyond these Muslim communities.

The current public controversies about multiculturalism are mostly not about ethnic folklore or language but about the incorporation of controversial religious claims. Religious claims must be accommodated within preexisting normative understandings and institutional arrangements of state-church relations that

have crystallized in nationally specific ways from centuries of demarcation struggles between states and Christian churches. Granting parity rights to Muslims in these arrangements proves controversial enough, as indicated by debates about state recognition of Islam in Germany or mosque construction in Switzerland. But in countries such as the Netherlands and the United Kingdom, which have granted Muslims parity rights and made basic accommodations such as the right of most public servants to wear a headscarf, the debate has not ended, and demarcation conflicts continue to rage over claims by orthodox minorities within Islam. Abstract and universal principles of multicultural or polyethnic rights are of limited help in drawing these boundaries because such universal principles leave no legitimate place to the path dependence of national state-church arrangements. Thus, they do not tell us where reasonable religious claims that merit accommodation end and where those that conflict too much with the values and institutional traditions of a particular society begin. Public statements that multiculturalism has failed or has strengthened extremists are among the symbolic lines in the sand by which such boundaries are drawn in public contestation over cultural claims. Even Canada, where the rhetoric of multiculturalism has survived, cannot escape such symbolic demarcation of the limits of accommodation. Since 2011, veiled women are not allowed to take the Canadian oath of citizenship without showing their faces. In words that might as well have come from Nicolas Sarkozy or David Cameron, Canadian Immigration Minister Jason Kenney (2011) defended the measure, proclaiming, "To segregate one group of Canadians or allow them to hide their faces, to hide their identity from us precisely when they are joining our community is contrary to Canada's proud commitment to openness and to social cohesion."

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Contents

Frontispiece <i>Charles Tilly</i>	xiv
Prefatory Chapter	
Formations and Formalisms: Charles Tilly and the Paradox of the Actor <i>John Krinsky and Ann Mische</i>	1
Theory and Methods	
The Principles of Experimental Design and Their Application in Sociology <i>Michelle Jackson and D.R. Cox</i>	27
The New Sociology of Morality <i>Steven Hitlin and Stephen Vaisey</i>	51
Social Processes	
Social Scientific Inquiry Into Genocide and Mass Killing: From Unitary Outcome to Complex Processes <i>Peter B. Owens, Yang Su, and David A. Snow</i>	69
Interest-Oriented Action <i>Lyn Spillman and Michael Strand</i>	85
Drugs, Violence, and the State <i>Bryan R. Roberts and Yu Chen</i>	105
Healthcare Systems in Comparative Perspective: Classification, Convergence, Institutions, Inequalities, and Five Missed Turns <i>Jason Beckfield, Sigrun Olafsdottir, and Benjamin Sosnaud</i>	127
Institutions and Culture	
Multiculturalism and Immigration: A Contested Field in Cross-National Comparison <i>Ruud Koopmans</i>	147
Sociology of Fashion: Order and Change <i>Patrik Aspers and Frédéric Godart</i>	171

Religion, Nationalism, and Violence: An Integrated Approach <i>Philip S. Gorski and Gülay Türkmen-Dervişoğlu</i>	193
Formal Organizations	
Race, Religious Organizations, and Integration <i>Korie L. Edwards, Brad Christerson, and Michael O. Emerson</i>	211
Political and Economic Sociology	
An Environmental Sociology for the Twenty-First Century <i>David N. Pellow and Hollie Nyseth Brehm</i>	229
Economic Institutions and the State: Insights from Economic History <i>Henning Hillmann</i>	251
Differentiation and Stratification	
Demographic Change and Parent-Child Relationships in Adulthood <i>Judith A. Seltzer and Suzanne M. Bianchi</i>	275
Individual and Society	
Gender and Crime <i>Candace Kruttschnitt</i>	291
White-Collar Crime: A Review of Recent Developments and Promising Directions for Future Research <i>Sally S. Simpson</i>	309
From Social Structure to Gene Regulation, and Back: A Critical Introduction to Environmental Epigenetics for Sociology <i>Hannah Landecker and Aaron Panofsky</i>	333
Racial Formation in Perspective: Connecting Individuals, Institutions, and Power Relations <i>Aliya Saperstein, Andrew M. Penner, and Ryan Light</i>	359
The Critical Sociology of Race and Sport: The First Fifty Years <i>Ben Carrington</i>	379
Demography	
The Causal Effects of Father Absence <i>Sara McLanahan, Laura Tach, and Daniel Schneider</i>	399
International Migration and Familial Change in Communities of Origin: Transformation and Resistance <i>Patricia Arias</i>	429
Trends and Variation in Assortative Mating: Causes and Consequences <i>Christine R. Schwartz</i>	451

Gender and International Migration: Contributions and Cross-Fertilizations <i>Gioconda Herrera</i>	471
LGBT Sexuality and Families at the Start of the Twenty-First Century <i>Mignon R. Moore and Michael Stambolis-Rubstorfer</i>	491
Urban and Rural Community Sociology	
Housing: Commodity versus Right <i>Mary Pattillo</i>	509

Indexes

Cumulative Index of Contributing Authors, Volumes 30–39	533
Cumulative Index of Article Titles, Volumes 30–39	537

Errata

An online log of corrections to *Annual Review of Sociology* articles may be found at
<http://soc.annualreviews.org/errata.shtml>