

**Trends in Citizenship Policies of the 15 Former Soviet Union Republics:
Conforming the World Culture or Following National Identity?**

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Abstract

The following paper examines the nature and change in citizenship policies in the former 15 Soviet republics since the collapse of the USSR till 2005. The main focus of the paper is the requirements that former Soviet republics adopted into their citizenship laws as prerequisites for naturalization, and the trend in changes made to these provisions.

The paper proposes a theory that combines Neo-institutionalism, particularly isomorphism of nation-state models and policies (Meyer et al)¹, with the national identity conceptions of citizenship (Brubaker 1992)² to explain trends and shifts in citizenship policies of newly independent nation-states of the former USSR upon entering the world society and later advancing in their nationhood and statehood.

Paper provides preliminary descriptive analysis of trends in requirements that are set for citizenship acquisition, as well as identifies a possible methodology for testing the proposed theory in future research.

Dataset used in this paper has been constructed by coding citizenship laws (and amendments) of 15 former Soviet states into dummy and continuous variables.

Key Words: Citizenship laws, former Soviet Union, national identity, neo-institutionalism

¹ Meyer J.W., John Boli, George Thomas, and Francisco Ramirez (1997). "World Society and the Nation-State" in *The American Journal of Sociology*, vol. 103:1, pp. 144-181

² Brubaker, Rogers (1992). *Citizenship and Nationhood in France and Germany*. Harvard University Press, Cambridge, Massachusetts- London, England

Introduction

Citizenship laws and naturalization policies have received increased attention during the last couple of decades mainly due to the globalization and European enlargement. In the 21st century- at the age of increased networking, citizenship policies determine the boundaries of interaction among individuals both at the nation-state and group levels.

Much has been written about migrants in Western European countries. Yet few studies have so far been conducted on Eastern Europe and former Soviet republics.

With the collapse of the Soviet Union, 15 post-Soviet republics were faced with internal and external pressures about how to conduct the nation-state building. Among the issues hotly debated were citizenship laws. What citizenship laws to choose? How would the citizenship law affect the nationhood and the nation-state? Stakes were high: nationalist movements and ethnic riots on the one hand, world community pressures on the other, were challenging the integrity of newly independent 15 Post-Soviet states. Under circumstances described, decisions had to be made fast.

The choices that former Soviet republics made about their nationhood and citizenship conceptions varied. Some states, such as Latvia or Lithuania, caught the attention of the international community with the requirements they set for naturalization of ethnic minorities that lived in their territories for decades (Human Rights Watch vol. 4). Others, such as Russia or some of the Central Asian republics, adopted a naturalization policy that did not require knowledge of the language, etc. Over the 15 years of independence, since the collapse of the Soviet Union, these citizenship laws have been amended, some countries have relaxed provisions, whereas others have added more requirements for the naturalization process. What factors affect the policy that newly adopted nation-states of the former USSR adopted for naturalization of migrants into their polities? This is a large question to answer that will require more than one paper.

In this paper our goal is to explore only a few aspects of the citizenship and naturalization policies of the former USSR states. *In particular, we are interested in general requirements of citizenship such as length of residency, sufficient source of income, knowledge of the language, constitution, and history.* Our goal is to identify whether any change occurs over time in regard to these provisions of naturalization since the country joins the world system. Which direction does the change in laws take? Does it become more particularistic and national?

Our discussion is based on descriptive analyses. In a later section of the paper we develop a theory and a possible model for testing our hypothesis in further research. Our data represent 1991-2005 period for the former USSR republics.

The first part of the paper develops the theory we build our research on. The second part of the paper provides background for the Soviet citizenship and the departures the former USSR republics took from the Soviet law upon the collapse of the USSR. This section also provides some descriptive analysis of the citizenship laws of post-soviet states. In the third part of the paper we develop our methodology and hypothesis, as well as suggest a possible approach for testing them in future research.

The Soviet Citizenship Law

In the legal literature and studies on citizenship and naturalization many scholars have been concerned with two main types of citizenship granting and naturalization. These two main approaches, along with some other requirements, define on which basis a foreigner can be granted citizenship.

Traditionally, a person's citizenship is determined by the citizenship/nationality of the parents or a direct line relative (known legally as citizenship 'jus sanguinis' or citizenship based on blood or descent). Many countries, besides granting citizenship based on a blood relationship of a person to a national of the state, also grant citizenship to a person at birth in their territory, regardless the citizenship of parents. That way of granting citizenship is known as 'citizenship based on territory of birth' or legally known as citizenship 'jus soli'. For example, a child born in the United States or in France is a citizen of these countries automatically, regardless the citizenship of the child's parents. Contrary, in Germany citizenship has traditionally been defined by descent. If citizenship based on a descent is a common practice among world countries, then citizenship based on the birth in a territory is relatively less common, and it is on based on the presence of the latter that we distinguish between inclusive (based on birth in the territory) vs. exclusive (defined by blood relationship) citizenship/naturalization conceptions.

Even though the Soviet citizenship was not based explicitly on 'jus soli', i.e. based on the birth in the territory of the country, the law was still very inclusive on the paper. Any child born to Soviet citizens was automatically a Soviet citizen (based on the descent/blood foundation of the law). However, if a foreign citizen wanted to naturalize to Soviet citizenship, then no residency, knowledge of a language, history, constitution, or any other requirements were set for naturalization (Boyars 1993). The only thing required from a foreign citizen was an application and a renunciation of the other country's citizenship (Sbornik Zakonov SSSR 1975, Svod Zakonov SSSR 1986). On that note, the Soviet citizenship did not recognize dual citizenship.

A foreigner, wanting to acquire Soviet citizenship, had to specify the choice of the republic s/he wanted to reside in. Once a citizen of that republic, a person was also a citizen of the Soviet Union (Esayan 1966, Shevtsov 1969, Kulik 1980). Thus, the only thing required from a foreign applicant to become a Soviet citizen was a permanent residence in one of the republics of the USSR.

Each of the Soviet republics had its own citizenship law that was very much similar in format and requirements to the main Soviet citizenship law. However, since these republics had different paths of becoming part of the USSR, their citizenship laws differed in defining who is a citizen upon adopting their first Soviet citizenship laws within the USSR system as a Soviet republic. Thus, as the main Soviet citizenship law, the citizenship laws of the USSR republics did not have requirements for residency, knowledge of language, etc.

Theoretical Foundation

Scholars have taken different approaches in explaining and trying to predict what factors determine the type of citizenship law and naturalization policy a particular country would take towards its immigrants. Many even believe that a new phenomenon, such as "world

citizenship” is emerging. Among those theories relevant to our questions is the theory proposed by Rogers Brubaker and the Neo-institutionalism.

One of the earliest and the most classical explanations of how countries adopt citizenship laws has been the thesis proposed by Rogers Brubaker (1992). In his classical thesis on France and Germany Brubaker claims that it is the national identity and nationhood conceptions that determine what citizenship policy a nation-state adopts towards its ethnic immigrants. Thus, in Brubaker’s terms citizenship serves as a moral boundary to the nation.

Brubaker’s classical thesis has identified two ideal types of citizenship models that have developed historically in France and Germany (1992). The French citizenship- the so called civic or inclusive citizenship, has historically been defined by the birth in the territory of the nation-state, whereas the German citizenship has historically been based on descent or blood relationship- thus known as ethnic or exclusive conception of citizenship (Brubaker 1992). Brubaker (1992) has illustrated that nationhood ideas and citizenship laws define territorial and moral boundaries of the state and the nation, thus are mostly strategic decisions made by nation-states.

Brubaker’s work has heavily influenced the way scholars have approached and analyzed conceptions of citizenship in the world. However, one should note that Brubaker’s thesis captured the era when the institution of the nation-state was just being formed. And thus the era that Brubaker’s theory refers to, describes nation-states that were defining not only their citizenship conceptions, but also their nationhood. In the 20th century, when the institution of the nation-state is well established, the newly formed nation-states (such as the post-colonial African states or the former USSR republics after the collapse of the Soviet system) may follow other patterns in adopting their citizenship and naturalization policies. Some scholars have even criticized Brubaker’s classical thesis by denying the causal relationship between the national identity and citizenship conceptions (Weil 2001). Weil also claims that differences in citizenship laws in the world are not due to the different conceptions of the nation, as Brubaker (1992) has proposed. As Weil (2001) claims, it is the historical citizenship conception of the nation-state, as well as the migration history and existence of diasporas (i.e. communities of ethnic nationals living outside of the nation-state) that affect variability in citizenship laws. We don’t see Weil’s variables contradict Brubaker’s (1992) theory. In fact, migration or diasporas are some of the variables that define or are necessary for constructing the national identity.

The theory, proposed in this paper, relies on Brubaker’s thesis heavily and extends it to Post-Soviet republics of the former USSR. However, we also incorporate elements of Neo-institutionalism into our theory.

Neo-institutionalism scholars have noticed decline in the importance of nation-state citizenship by claiming that with globalization and European Enlargement citizenship models exceed nation-state boundaries (Soysal 1994). Soysal (1997, 2000) goes on to claim that in Western Europe Muslim communities refer to human rights scripts to exercise many rights that were previously granted by traditional conceptions of citizenship, i.e. the right to vote in local elections and more (Marshall 1965). Halfmann (1998), on the other hand, takes a middle position between Neo-institutionalism and Brubaker’s (1992) theory and addresses the tension between universalistic (role of a citizen based on various human rights, such as to vote) vs. particularistic (status of a citizen as such) aspects of citizenship.

Neo-institutionalists, such as J.W. Meyer and his team, have argued that nation-states are embedded in a larger world culture, thus there is a worldwide trend of homogenization of

state structures, national identity models, as well as state policies (Meyer et al 1997: 158). Nation-state models are also expected to be applied in a universal manner by every nation-state (Boyle and Meyer 2002). Applied to citizenship laws, every citizenship law is designed around a set of provisions, or so called a template. These provisions are standards that countries adopt when making their laws. In his analysis of 21 countries across the world, including Australia, Mexico, South Africa, European countries, Weil (2001) identifies some provisions that serve as foundations for every citizenship law. These are the requirements for granting citizenship, such as the legal source of income, residency length, provisions for dual citizenship, etc. All countries' citizenship laws can be classified along this set of requirements. For example, among the 21 countries in Weil's (2001) analysis (Latvia, Lithuania, Estonia and Russia excluded), 14 out of 21 (66%) had requirement of language in their law, 30% of the countries in his sample had income as a requirement for naturalization, all countries had a provision for citizenship being granted by descent, only less than 14% granted citizenship by birth without any further condition. To continue in neo-institutionalist spirit, we should expect to see newly established countries to adopt the citizenship laws in a universal manner as they integrate into the world society. In other words, upon the exit of the USSR the newly established nation-states borrow nation-state models and rapidly conform the world scripts of statehood and policy models.

Given the Neo-institutionalist perspective on nation-states and their integration into the world polity, as well as the nationhood-citizenship dynamics proposed by Brubaker (1992), below we outline our theory that combines both theories described above to explain how newly independent 15 Republics of the former USSR adopt their citizenship laws.

The Theory Proposed and Hypotheses

The Soviet states are different from the Western democracies by their history, culture, politico-economic structure. As Brubaker writes (2000), many ethnic minorities of the Soviet Union found themselves as "accidental diasporas" when the boundaries of the republics changed during the Soviet rule. Moreover, Soviet officials used to send Russian employees to work in various Soviet republics as part of the centralized economy and the lack of labor force in these republics, or as part of maintaining the Russian army in these republics. Over time, the Russian workers established their families in these republics and formed big Russian communities within them. Thus, upon the collapse of the USSR, many republics were faced with issues of defining or even re-inventing their national identity. Thus, the ethnic tension within these countries escalated and was most apparent in citizenship laws adopted.

Simultaneously, as predicted by Neo-institutionalism, upon the independence, the newly established states were expected to adopt nation-states models and policies, including their citizenship laws (Meyer et al 1997, Boyle and Meyer 2002) in a universal manner. Thus, one would expect to see high similarity with other countries in citizenship laws adopted by the former USSR countries. In other words, our countries 'borrowed' from other countries of the world citizenship law *templates*. Countries need citizenship laws as part of the nation-state model. Thus, in the first years of independence, the provisions in citizenship laws are established under pressure to conform to the world culture.

However, over time, once the nation-state is established, nationhood ideas come to define and amend citizenship laws. If in the first stages of independence and establishment of the nation-state citizenship laws are 'borrowed patterns', then the later amendments are a result of

‘particularization’ or application of the law to the national context, i.e. making it ‘national’. Thus, one should expect to see some general trends where national identity variables drive the further revisions to citizenship laws.

We are interested in the impact of the world society theory and national identity theory on such requirements for naturalization as the legal income, knowledge of language, knowledge of the political system, history and the length of residency.

It is very important to note, that Neo-institutionalism and national identity theory do not contradict each other in our theory. But in fact, combined together they provide full explanation for changes in citizenship policies affected by certain factors.

Hypotheses:

Neo-institutionalism: Some of the former Soviet states, such as Baltic republics or the Armenia and others were independent states before they joined the Soviet system. Thus, in the framework of Neo-institutionalist theory we should expect to see world culture (measured as the number of memberships to conventional IGOs), length of being in a world system as a state, time in years after independence since the collapse of USSR, Christian heritage and democratization level affect the inclusion of certain provisions for granting citizenship into the naturalization law. The effect of world conformity should be more evident in earlier stages of independence from the USSR. Thus, we should expect to see rapid law adoptions, and more similarity among the provisions established in the laws.

Hypothesis-1: At early years of independence, former Soviet Republics will adopt citizenship laws to rapidly conform the world culture.

Nationhood and National Identity:

Given the fact that many of the nation-states of the former Soviet Union during the 70 years of the Soviet Rule had changed in their ethnic composition patterns regardless of the national-political view of their nation (due to the formation of ‘accidental diasporas’ coined by Brubaker (2000)), then as the nation states establish themselves as legal entities in the world system, the nationhood conceptions come to define the further changes and amendments made to their laws (Brubaker 1992).

Thus, we should expect to see such variables as ethnic composition of the nation-states (measured as percent of minorities in the population), or migration rate, to determine the further changes made to the already adopted provisions of the laws. More specifically, the timing for further changes in the citizenship laws is determined by national identity conceptions.

Hypothesis- 2: At later years of independence, former Soviet Republics will amend their citizenship laws as part of redefining their national identity and nationhood.

To summarize, in early stages, variations and similarities in inclusions of particular provisions for naturalization into citizenship laws should be accounted for Neo-institutionalism variables.

At later years of independence the differences in trends of change in citizenship acquisition requirements should be accounted for variables that define national identity.

Departures from the Soviet Citizenship Law: Trends and Descriptive Analysis

Table 1. Dates of Citizenship Law Adoptions After the Collapse of the USSR

Country	Year
Armenia	1995
Azerbaijan	1990*/1998
Belarus	1991
Estonia	1995
Georgia	1993
Kazakhstan	1991
Kyrgyzstan	1993
Latvia	1994
Lithuania	1991
Moldova	1991
Russia	1991
Tajikistan	1995
Turkmenistan	1992
Ukraine	1991
Uzbekistan	1992

*1990 law was adopted as an SSR law, entered into force in 1991. Azerbaijan's citizenship law after the collapse was adopted in 1998 only.

Source: IOM 2006

As stated in an earlier section, the Soviet citizenship law was very inclusive on the paper. It did not set any requirements for naturalization. A foreign person could become a Soviet citizen simply by filing an application for naturalization, indicating the Soviet republic where s/he would have a permanent place of residence, and renouncing his/her other citizenship to avoid dual citizenship. No legal source of income, no any length of residency, no knowledge of history, political system or language was required from a foreigner to join the Soviet polity.

Upon the collapse of the USSR all of the republics adopted their own citizenship laws. Table 1 indicated the dates when these laws were adopted. By 1998 all of the former Soviet republics had their own new citizenship. Since some republics adopted the law at a later date, then to regulate their citizenship issues until then, certain legal acts were issued to regulate migration and citizenship related matters.

In terms of Neo-institutional theory and similarity in isomorphism of nation-state models, upon the collapse of the USSR all of the former republics adopted decent-based citizenship, and only 3 states-

Azerbaijan (in 1998), Kazakhstan (in 2002) and Moldova (in 2000) incorporated 'citizenship by birth in the territory' as an unconditional option for children of foreigners to acquire citizenship.

As also expected from the Neo-institutionalism perspective, all of the republics included certain length of permanent residency as a pre-requisite for naturalization. Table 2 indicates that over time the trend in adopting residency requirement has been towards 5 or more years. By 1998 all of the republics had departed from zero-length residency of the Soviet law, 60% of them required at least 5 years, and 30% required 7 or more years of permanent residency as a requirement for naturalization. If any change has occurred in altering the length of residency, then it has been towards increasing it, rather than decreasing. In other words, it has been towards delaying the immediate naturalization by maintaining certain time periods necessary for integration/assimilation of migrants/ethnic minorities into the society.

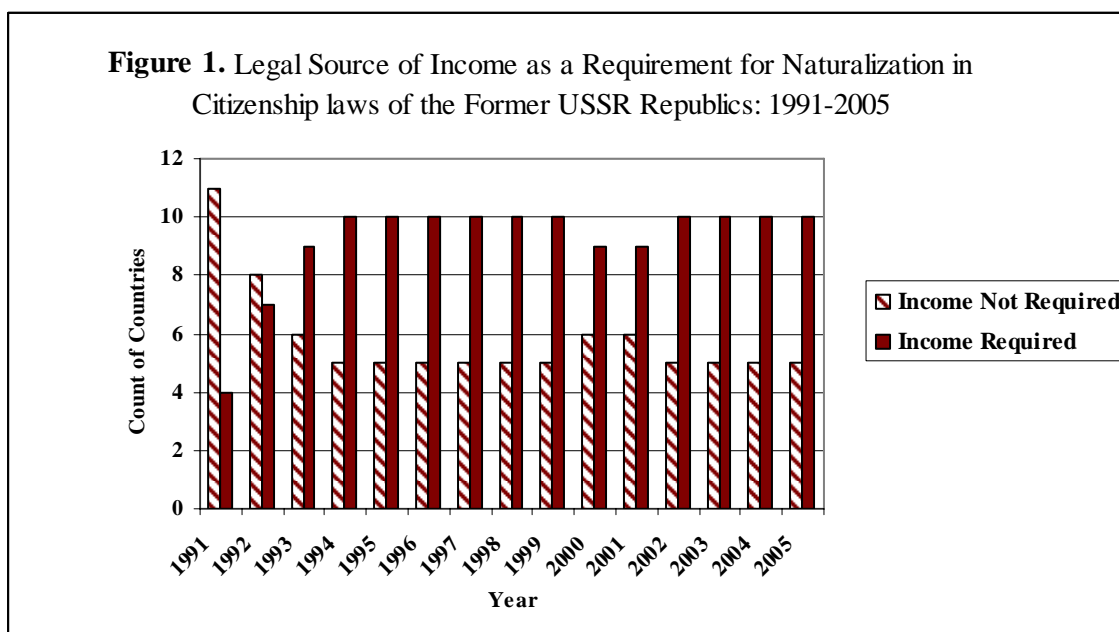
Table 2: Number of Former Soviet Republics by the ‘Length of Residency’ (in years) as a Requirement for Naturalization

Residency Length in Years	Year														
	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005
0 years	9	6	4	3	1	1	1	----	----	----	----	----	----	----	----
2 years	----	1	1	1	----	----	----	----	----	----	----	----	----	----	----
3 years	----	----	----	----	1	1	1	1	1	1	1	1	1	1	1
5 years	2	3	4	5	8	8	8	9	9	9	9	9	9	9	9
7 years	1	2	2	2	2	2	2	2	2	2	2	2	2	2	2
10 years	3	3	4	4	3	3	3	3	3	3	3	3	3	3	3
Total	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15

Source: Citizenship Laws of the Former USSR Republics (coded by the author of the article)

Even more variation one can observe in trends regarding the requirements for legal source of income, knowledge of language, and political system- all of which are part of standard requirements set for naturalization to citizenship.

According to figure 1, during the first years of independence, most of the Soviet republics (over 60%) rapidly incorporated legal source of income as a necessity for naturalization. However, interestingly enough, despite the economic hardships faced by all of the republics due to transition to capitalist economy and high rates of unemployment, by 2005 one third of the republics (30%) still had not establishes requirement of legal source of income into their laws of citizenship. It is in this variation that we are interested and are hoping to explore by the theory proposed.

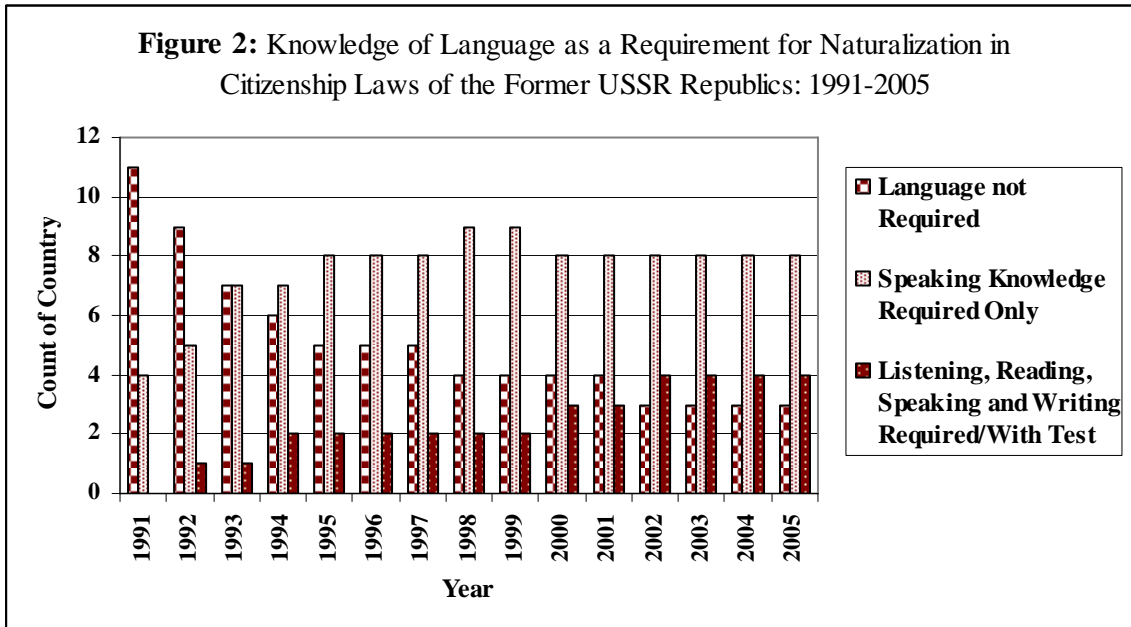


Much more interesting is to observe the trend in adopting language requirement into the laws. Language is a key for national identity for many of these republics (King and Melvin 1998), such as for Armenians (see Smith 1986, 1999), or for the Baltic republics (Popovski

1996). During the Soviet times all of the republics had to teach Russian in their schools as part of the Russification and integration of various nationalities into the Russian Soviet culture. For some of the republics this assimilation to Russian culture was higher than for others. For example, by 1994 in Kazakhstan only 40% of the population spoke Kazakh and about 60% spoke Russian (Central Intelligence Agency 1994). In the same source we find out that in Uzbekistan about 30% of the population spoke Russian as their native language, whereas in Armenia only 7% of the population spoke Russian as a native language. As we can see from these numbers, the level of assimilation varied. And thus, we should expect to see interesting difference in how nation-states address language in their citizenship laws in the framework of their national identity.

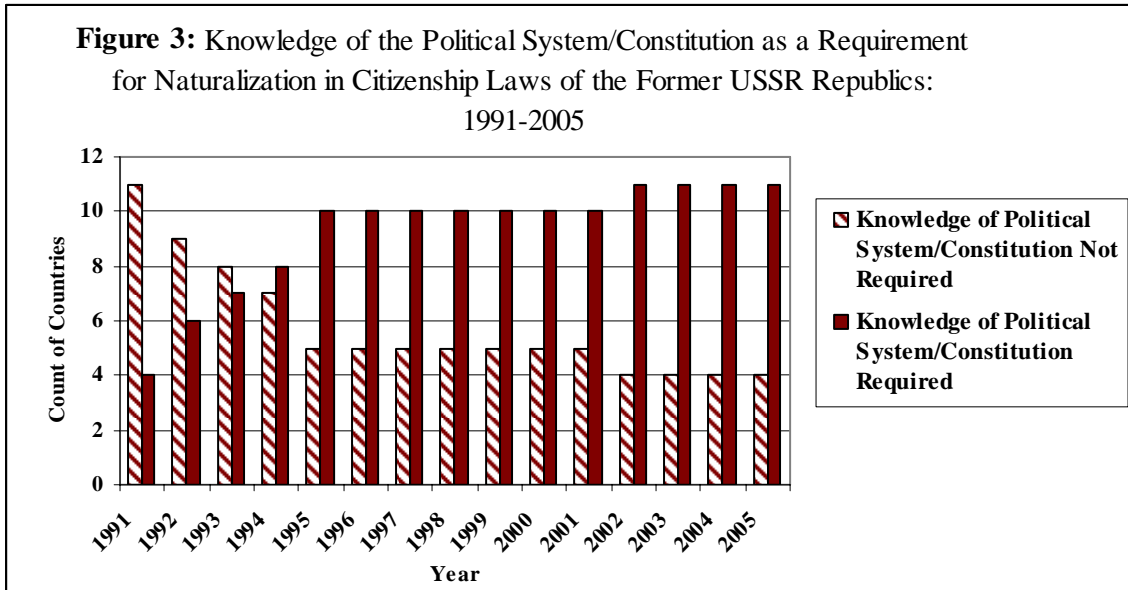
One can distinguish three levels of knowledge of language- (1) no knowledge at all, (2) speaking knowledge required for minimum communication, and (3) speaking, reading, writing and listening knowledge examined by a formal testing company. It is apparent that the adoption of the latter takes the citizenship law closer to be more exclusive and more national, whereas the ‘no-language’ requirement option makes citizenship more inclusive and easier for various ethnic groups naturalize.

The distribution of the language requirement in citizenship laws of the 15 former Soviet Republics over time indicates that once the language requirement has been adopted, it has taken a trend to become more demanding of migrants in terms of the level knowledge of language required. Figure 2 describes that even though some republics (20%) never incorporated language requirement into their citizenship laws by 2005, still the number of these republics has decreased over time. Half of those 80% that incorporated language into



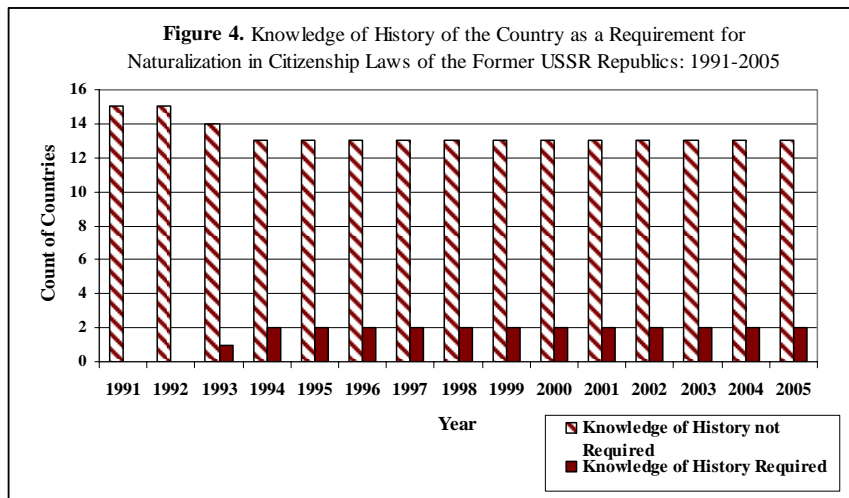
their laws, over time have shifted towards establishing certain formal testing procedure for the language knowledge 2005. This trend indicates that language requirement too, after being adopted, has over time been affected by the national identity demands of the particular country. According to our theory, we expect to see the percent of ethnic minorities in the population and the percent of the population speaking a foreign language affect this shift over time. The descriptive trend supports our hypothesis.

Between 1991 and 2005 demands for the knowledge of political system and the constitution of the country have also changed in regard to naturalization of foreigners into the polity. Figure 3 clearly indicates that by 2005 more than 70% of the republics had adopted knowledge of the political system into their citizenship laws, and only less than 30% did not demand of foreigners to be familiar with the political system of the country upon joining the polity. From Neo-institutionalism perspective, the level of democratization of the country and the Christian heritage should be counted for this difference. However, from the national identity perspective we expect that the migration rate, presence of refugees should also be significant factors determining this trend at later stages of independence.



And eventually, figure 4 indicates that post-soviet republics have been more reluctant to include into citizenship law the knowledge of history as a prerequisite for naturalization. Only 2 out of 15 republics (13%) by 2005 had established knowledge of history into their naturalization legislation. As we stated earlier in our reference to Weil’s (2001) sample of 21 countries, only 14% had history stated as a requirement.

Thus, similar to the world trend, among the post-soviet states we see similarity in the way they have adopted or chosen certain provisions into their naturalization legislation. It is in the difference patterns that we are interested in. Why some countries adopt/change certain provisions, whereas others don't?



Based on the descriptive trends identified above, it is apparent that once the law is adopted as part of the nation-state model in a world society, then it is amended to apply the unique national characteristics. Throughout their years of independence, post-Soviet republics faced various pressures from intergovernmental organizations about how to treat their ethnic minorities, refugees and other groups at risk. Despite these pressures and criticism, many followed their national identity rather than the pressures of the world society to redesign their laws (Human Rights Watch vol.4). Thus, our theory suggests that pressures of international community are more tangible in terms of impact on nation-states at earlier stages

In the next section below we briefly outline the methodology that will be used in further research to test the theory proposed in this paper.

Methodology for Further Analysis and Expected Findings

We propose survival analysis to identify the factors affecting the trends in citizenship law requirements of the former 15 Soviet Union Republics. The event we are interested in is the adoption of certain provision, such as income, knowledge of language or political system into the law. Thus, our failure event occurs when any of these provisions are included into the law.

Since each time the law is amended, the provision can be re-adopted or excluded from the law. Thus, our events enter the risk period once the previous failure (i.e. event of interest) has occurred. In other words, between the times of amendments our events of interest are in the risk period. The possible testable model should look as indicated in table 3.

Table 3. Event History Analysis Model for Determining Adoption of Certain Requirements into Naturalization Laws

Baseline model	Neo-institutionalism	Nationhood	Full model
Population Size	Population size	Population Size	Population Size
GDP Per Capita	GDP Per Capita	GDP Per Capita	GDP Per Capita
Unemployment	Unemployment	Unemployment	Unemployment
	Level of Democratization	Net Migration	Level of Democratization
	Total Number of Memberships to IGOs	Percent of Ethnic Minorities	Total Number of Memberships to IGOs
	Christian Heritage		Christian Heritage
	Numbers of Years in the World System*		Numbers of Years in the World System*
	Years Since Independence Upon the Collapse of the USSR		Years Since Independence Upon the Collapse of the USSR
			Net Migration
			Percent of Ethnic Minorities

*This variable defines the total number of years that a particular nation-state has been in the world system. Many of the USSR republics were nation-states for various periods before they joined the USSR. And this variables accounts for that.

As the analyses are pursued, interaction among the covariates should be accounted for and incorporated into the analysis. Moreover, since many of the covariates have lagged effect on our dependent variables (i.e. on the occurrence of the events of interest), then some of the covariates will be lagged in the analysis to account for delayed impact on dependent variables.

According to our hypotheses, we should expect to see Neo-Institutionalism variables affect the event of adopting provisions into citizenship laws in early stages of independence. For example, the number of memberships to IGOs should increase the hazard of including a particular provision, such as knowledge of the political system, into the citizenship law (i.e. the first 'failure' of the events should be affected by Neo-institutionalism). However, over time of independence we should expect to see nationhood variables, such as migration rate or the proportion of ethnic minorities in the country to affect the amendments made to the laws. That means that as to whether the country maintains the already adopted naturalization provision, or discards it upon amendment made to the law is a repeated failure event and will be affected by nationhood variables.

Conclusion

It was our goal in this paper was to outline a theory that describes how societies in transition, such as the newly independent former USSR Republics, adopt their citizenship laws under the impact of the world society scripts and the nationhood ideas.

We combined Brubaker's (1992) nationhood theory of citizenship with Neo-institutionalism explanations of isomorphism in nation-state models (Meyer et al 1997) to describe how former Soviet Republics shifted in their naturalization policies over time since the collapse of the USSR.

The descriptive trends identified in this paper are in line with our theory and hypotheses. As was evident from the trends described in the sections above, in the early stages, naturalization provisions are quite similar and adopted mostly universally as part of a world cultural scripts of nation-state models. However, over time, these laws undergo a process of 'particularization' or 'becoming national'. Thus, we expect in further analysis to find support for the hypothesis that at later stages of independence it is the nationhood ideas, such as migration patterns or proportion of ethnic minorities, that determine the citizenship and naturalization policy of the state.

Very few quantitative comparative analyses have so far been conducted on citizenship policies of the world countries, not even localized in certain regions (but see descriptive analysis by Weil 2001). Thus, the theoretical perspectives have so far been based mainly on case-studies. We proposed a comparative study to document trends in citizenship policies of nation-states in the former USSR over time since the collapse of the USSR. Our goal in the theory proposed was to identify the trends that have taken place in citizenship policies of the former USSR republics and capture the factors that have affected that trend.

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