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The limits of rights: claims-making on behalf of immigrants

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ABSTRACT

Activists do not just 'name' problems faced by migrants; they 'frame' them, constructing a particular meaning of the social world. Activists in the United States are especially likely to use rights language. Some appeal to human rights; others call on the history and resonance of civil rights. Those who contest immigrant inclusion often instead evoke 'American values'. Are these competing frames persuasive? Drawing on a survey experiment of California voters, we examine whether these frames affect support for undocumented immigrants and U.S. citizens in need. We find that although respondents agree that food insecurity, sexual harassment, and inadequate health care violate the human rights of citizens and noncitizens equally, a human rights frame does not equalise support for government action to address the situation. Indeed, overall, respondents are much less supportive of government action for undocumented immigrants than citizens; neither rights nor value frames mitigate this inequality. The civil rights frame, relative to the American values frame, actually decreases respondents' support for government action, for citizens and noncitizens alike. The type of hardship also matters: in scenarios concerning sexual harassment, legal status is not a barrier to claims-making. These findings reveal some limits of rights language for mobilisation around immigration.

Introduction

In 2006, up to five million people took to the streets to give voice to immigrants and protest a Congressional bill that would have criminalised being undocumented. In the short term, protesters succeeded, stopping the legislation from passing the U.S. Senate. But over a decade later, Congress remains deadlocked over immigration reform. Former President Barack Obama offered some help to undocumented youth under the Deferred Action for Childhood Arrivals program, but he also oversaw hundreds of thousands of deportations during his presidency. Current President Donald Trump has proven even more anti-immigrant, from deportations and banning people from certain Muslim-majority countries to questioning birthright citizenship and calling for a wall between the U.S. and Mexico. His election suggests that many Americans hold ambivalent, if not outright hostile, attitudes toward immigrants. Such unsympathetic views persist despite over a

decade of activism by young undocumented DREAMers and advocacy by civil society allies, from churches and unions to the U.S. Chamber of Commerce. Today, some view the immigrant rights movement as a failure or, at the least, a movement in trouble. Making claims on behalf of immigrants has proven remarkably difficult, not just in the United States, but also in other Western democracies (Bloemraad and Voss 2019; de Graauw, Gleeson, and Bada 2019).

Beyond deportation and legalisation, there is also deep disagreement among American voters and elected officials over conferring rights, benefits, and protections based on legal status. In 1996, Congress excluded undocumented migrants from most federally funded social assistance and barred noncitizen legal permanent residents from some benefits. The 2010 Affordable Care Act likewise excluded undocumented immigrants, and various state and local governments have passed restrictions targeting unauthorised immigrants. In contrast, other states and localities have recast membership as about living in a place, not holding a federally determined legal status. In California, although voters in the 1990s approved a referendum to deny public assistance to undocumented migrants, today the state is at the forefront of inclusive efforts. California allows undocumented residents to attend college and pay tuition fees equivalent to those of other state residents, it lets undocumented adults acquire driver's licenses, and it works to inform unauthorised immigrants of their labour rights and civil protections. In San Francisco, the nation's first city-run universal healthcare plan extends primary medical care to undocumented residents (Marrow and Joseph 2015).

From deportation to social benefits, advocates for immigrants seek to sway the hearts and minds of citizens who cast ballots in referenda and vote on the composition of national, state, and local legislative bodies. We ask: how can social movement actors effectively frame immigration issues so that American voters acknowledge problems faced by those without legal status and support government action to deal with their difficulties?

The burgeoning literature on framing immigration comes to some disquieting conclusions for immigration advocates. Although economic arguments are widespread – pitting claims about immigrants' economic contributions against their supposed cost in government spending or impact on wages (Gleeson 2015) – research shows that economic frames have limited effect on public opinion (Bloemraad, Silva, and Voss 2016; Hainmueller and Hopkins 2014). Rather, invoking criminality or framing policy debates as about rewarding people who break the law drives down support for undocumented immigrants (Haynes, Merolla, and Karthick Ramakrishnan 2016; Wright, Levy, and Citrin 2016).

Immigration advocates respond by drawing on the language of empathy and commonality. Some underscore how families are torn apart by deportation. Research suggests, however, that such frames move public opinion only slightly, and perhaps only among narrow segments of the population such as conservative women (Bloemraad, Silva, and Voss 2016; Haynes, Merolla, and Karthick Ramakrishnan 2016). Appeals to noncitizens' 'Americanness' fare better. Emphasizing how long an undocumented immigrant has lived in the United States, how young she or he was when they arrived, or how much they embody civic virtue and successful integration shifts reported opinion in favour of undocumented immigrants and increase the chance that an anti-deportation campaign will be given sympathetic media coverage (Haynes, Merolla, and Karthick Ramakrishnan 2016; Patler 2018).

Indeed, social movements employ multiple messages. Beyond claims about immigrants' benefits (or costs) to the economy and security, or empathetic language of family, many advocates and legal theorists embrace rights language to make their case. Human rights are a particularly attractive frame since their moral and philosophical foundation rests on universal human dignity and equality irrespective of citizenship or birthplace (Fujiwara 2005). There is, however, surprisingly little research on the effectiveness of human rights language as a framing strategy, especially in the United States.

In the United States, rights language can also take the form of appeals to civil rights. In the years leading up to the civil rights movement, attempts to use human rights to frame the plight of and remedies for African Americans floundered upon Cold War suspicions of 'socialist' thinking or claims that international bodies such as the United Nations, which promoted human rights, were an assault on U.S. sovereignty (Roberts 2017; Soohoo and Stolz 2008). American activists instead built an alternative language of 'civil rights' to frame and advance the claims of racial minorities. Since then, civil rights – and rights language in general – has been viewed as a powerful, effective way to frame a host of social movement causes, from LGTBQ rights to the rights of gun owners.

Indeed, some have called 'rights language' a 'master frame' that is sufficiently elastic, flexible, and inclusive in its cultural relevance that it can be deployed by many different social movements (Benford and Snow 2000, 619, 621). By evoking the ideal of equal rights regardless of ascribed characteristics, rights-based appeals are presumed to sway the American public to be more inclusive, egalitarian, and generous to those who might be seen as outsiders. Yet civil rights, unlike human rights, evoke constitutional claims, arguably heightening the distinction between citizens and noncitizens. It is thus an open question whether civil rights frames can motivate support for noncitizen outsiders.

Rights appeals – human or civil – may be more attractive to progressive or ideologically liberal voters (Lakoff and Ferguson 2006). In contrast, some scholars suggest that claims using patriotic, in-group language may be more attractive to conservatives (Graham, Haidt, and Nosek 2009). Indeed, anti-immigrant advocates and politicians like President Trump often use the vocabulary of 'American values' to mobilise supporters. But in the 2006 protests, in the Dreamer movement, and today, pro-immigrant advocates challenge exclusionary understandings of 'American values'. The Idaho Community Action Network, for example, created posters that proclaim 'Immigration is an American Experience. Acceptance is an American value'. It is unclear, based on current scholarship, whether an appeal to 'American values' legitimates or undermines immigrant-inclusive claims.

Are appeals to human rights, civil rights, or American values efficacious for generating support for noncitizens? We draw on a survey experiment conducted in summer 2016 with a sample of registered California voters to assess the extent to which voters draw legal status distinctions in evaluating three situations that may violate core standards of human need and dignity: food insecurity, serious illness without access to health care, and sexual harassment in the workplace. Specifically, we assess whether voters perceive these situations to be *violations* of human rights, civil rights, or American values, and whether they support *government action* to address these situations. Further, we examine whether framing these situations as violations of human rights, civil rights, or American values increases support for ameliorative government action on behalf of noncitizens and whether such frames mitigate (or exacerbate) legal status distinctions.

Our analysis indicates that California voters make clear distinctions based on legal status when evaluating the need for government action to address hunger and serious illness. Rights language – whether couched as human or civil – does not mitigate this categorical inequality. A human rights framing is more inclusive of undocumented immigrants when respondents are asked whether food insecurity and untreated illness constitutes a *violation* of rights, but it does not move voters to be more supportive of *government action* for noncitizens in need. Surprisingly, for citizens and noncitizens alike, a 'civil rights' frame generates the least support for government action; an 'American values' frame generates the most support, even for undocumented immigrants.

We also test whether the undocumented penalty and frame resonance varies by voters' ethno-racial background and political ideology. We find that while all respondents support less government action on behalf of undocumented immigrants than U.S. citizens, the extent of the undocumented penalty varies. Latinos penalise undocumented status less than whites, and liberals penalise it less than conservatives. We find limited evidence, however, for differential frame resonance: liberals and conservatives, and whites and Asian/Pacific Islanders, all express stronger agreement that difficult situations violate American values and human rights than civil rights. The biggest difference is not by frame, but hardship. Respondents make significant distinctions between undocumented Californians and citizens when asked about food insecurity and health care, but we find no evidence of categorical differences by legal status for someone who experiences sexual harassment.

Making claims on behalf of noncitizens

In the classic language of social movements and political sociology, immigrants are 'challengers', forced to engage in contentious action because they see few opportunities for voice or influence in the formal political system (Tilly 1978). Noncitizens, with very few local exceptions, are barred from the U.S. electoral system, denied the right to vote or stand for office. Yet the laws that determine their status as undocumented, temporary residents, permanent residents or U.S. citizens are decided by Congress. Likewise, the extension of rights or public benefits, ranging from labour laws and disability benefits to post-secondary education, are largely determined by elected officials at the local, state or national level. Since noncitizens have no access to the ballot box, social movement leaders and organisations must appeal to ordinary voters in the formal political system to change legislation affecting immigrants.

Our question – how to effectively frame immigration? – is a subset of broader questions asked by sociologists, political scientists and law and society researchers. When do people identify something as a social problem? When do they believe that societal institutions should step in to help? People in general – and activists in particular – do not just 'name' problems, but they 'frame' them, constructing a particular meaning or labelling of the social world. Scholars of law and society note that formal dispute resolution, including an appeal to the courts, depends on a messy antecedent process of 'naming, blaming, and claiming': people must identify an injurious experience, understand it as a grievance, and then decide to make a claim for redress or change (Felstiner, Abel and Sarat 1980). In research on social movements, because the existence of objective grievances is insufficient to spur mobilisation, scholars underscore the power of collective action 'framing'. Activists must develop a shared understanding of a problem to be addressed, make attributions

regarding who or what is to blame, articulate a solution or change, and then urge action to affect change (Benford and Snow 2000).

Existing research on naming, framing, and making claims shares a common blind spot: it largely ignores the relevance of legal status. Researchers usually presume a population of citizens living within the boundaries of a particular nation-state. A citizen makes claims, and other citizens evaluate those claims' legitimacy. But legal status, as Douglas Massey (2007) has put it, renders people 'categorically unequal'. This raises the question of whether and how shared citizenship might be an unquestioned pre-condition to people's willingness to identify a situation as unjust, and how it might impact their support for action to ameliorate the situation.

To examine this, we take on the 'hard' case of undocumented immigrants. Social movement scholars and political sociologists have long studied 'challengers' relegated to second-class citizenship, such as African Americans or LGBTQ citizens. These outsiders have, however, shared the nationality of those in power. This, we think, is consequential in liberal democracies. Appeals to citizenship, and the rights of citizens, have served as important rallying cries, from Martin Luther King Jr.'s appeal to the 'promissory note' of the U.S. Constitution to gays and lesbians' call for the right to marriage equality. But how does one make claims on behalf of foreign residents who cannot even evoke second-class 'citizenship'?

The promise of human rights frames

One strategy is to employ human rights frames. In the 1990s, various scholars argued that universal personhood norms and human rights institutionalised in international agreements or regional bodies provided extensive rights and benefits to immigrants, rendering citizenship status increasingly irrelevant (Sassen 1996; Soysal 1994). Slogans such as 'Immigrant Rights Are Human Rights' were used when poor, disabled and elderly noncitizens faced exclusion from social benefits in the 1990s (Fujiwara 2005), were advanced during the 2006 immigration mobilizations (Voss and Bloemraad 2011), and continue to be prominent (Gleeson 2015). Saskia Sassen (2006) contends that a human rights frame is the best way to understand claims-making in the 2006 protests. Similarly, legal scholars have issued a call to 'bring human rights home' to the United States, suggesting that human rights appeals are efficacious for social justice claims on behalf of the disadvantaged (Soohoo and Stolz 2008).

Surprisingly, we know little about the resonance of human rights appeals for ordinary Americans. U.S. opinion surveys rarely query human rights. In the rare instances they do, questions almost always refer to foreign affairs, not domestic issues (e.g. 'Should promoting and defending human rights in other countries be a very important policy goal … ?'). To our knowledge, only two private surveys have asked extensive questions on human rights and domestic policy, a 1997 poll sponsored by Human Rights USA and a 2007 nationally representative survey by the Opportunity Agenda. Strikingly, in the 2007 poll, although 72% of respondents agreed that 'access to health care' should 'strongly' be considered a human right, only 24% of respondents 'strongly' agreed that denying illegal immigrants access to medical care is a violation of human rights. Thus, health care is a human right in the abstract, but denying health care is not a human rights violation in the specific case of illegal immigrants. The contradiction in responses, and the general paucity of data on domestic human rights claims, demands new research.

Civil rights for noncitizens?

In the United States, an alternative rights-claim employs the language of civil rights. As Snow and Benford argue, the civil rights movement articulated a resonant master frame around 'the ideal of equal rights and opportunities regardless of ascribed characteristics' (1992, 146). Indeed, what is sometimes referred to as a generic 'rights' frame was, in the U.S. context, initially termed the 'civil rights' master frame. It is a touchstone that continues to inspire activists. In 2003, two labour unions, UNITE HERE and SEIU, organized cross-country bus rides under the banner of 'Immigrant Worker Freedom Rides', drawing parallels to the cause, tactics, and language used by activists in 1961 who rode buses to protest segregation in the South (Bloemraad, Voss, and Lee 2011, 24). Today, the American Civil Liberties Union and some legal scholars highlight parallels between long-standing commitments to civil rights issues for African Americans and newer 'immigrant rights' agendas (Johnson and Hing 2007).

However, as Bloemraad, Silva, and Voss (2016) argue, 'civil rights' are embedded in a particular American set of institutions, notably the Constitution and judicial review, with an implicit appeal to a narrative of U.S. citizenship. It is thus unclear whether the language of civil rights is understood by ordinary Americans as a universal appeal that includes noncitizens, only applies to U.S. citizens, or perhaps applies to African Americans in particular. There is evidence that some Americans, and especially black Americans, equate 'civil rights' with the concerns and aspirations of African Americans, not immigrants (Victoria and Belcher 2009). Such a linkage might produce a backlash against framing immigration issues as a matter of civil rights.

Furthermore, rights language – whether centred on civil or human rights – may not appeal equally to people of different political ideologies. In a framing contest between an appeal to human rights versus protecting the rights of American citizens 'first and foremost', Bloemraad, Silva, and Voss (2016) find slight positive effects among liberal California voters towards pro-immigrant positions. However, most respondents were less likely to support legalisation and a path to citizenship for undocumented immigrants when human rights were pitted against the rights of American citizens. The authors suggest that rights frames 'may be inaccessible to noncitizens, at least in the minds of many in the public' (2016, 1667). The study did not, however, test the independent effect of a human rights appeal, nor did it evaluate the resonance of civil rights language. It also did not test whether rights-based claims-making works better for American citizens than undocumented immigrants, a question that animates the current article. Such a comparison is necessary to understand whether the efficacy of rights claims hinges on legal status or citizenship.

American values: exclusionary or inclusive?

Political candidates suspicious of immigrants regularly appeal to 'American values' to exclude noncitizens and mobilise support for anti-immigrant policies in election campaigns. The prevalence of such appeals suggests that such a framing could lead voters to draw stronger boundaries *against* immigrants. Yet there is also suggestive evidence that, in some cases, appeals to 'Americanness' generates support for (some) noncitizen immigrants, even undocumented residents, although such appeals work best for those who entered the United States as young children, have lived in the country for a long

time, or embody a type of 'super-citizenship' denoted by community engagement, educational success, and acculturation (Nicholls 2013; Patler 2018). To be attentive to framing strategies with diverse valences, our study examines both 'rights' and 'American values' appeals.

Previous research does not offer clear predictions about the effectiveness of appeals based on human rights, civil rights, or American values. Nevertheless, we expect civil rights and American values frames to have limited efficacy for undocumented residents because they highlight the boundary between citizen insiders and non-citizen/non-American outsiders. Appeals to American values may even generate backlash against immigrants, given its use in exclusionary political discourse. In contrast, in line with normative legal theory, we hypothesise that the human rights frame, because it appeals to human worth irrespective of citizenship or birthplace, will resonate for situations involving either an undocumented immigrant or an American citizen. We nonetheless remain open to the possibility that human rights frames will be ineffective in the U.S. context due to their international connotations. Finally, we wonder whether framing effects vary by respondents' ethno-racial or ideological background. For example, as noted above, the patriotic, in-group language of American values may be more attractive to conservatives than rights-based appeals.

Data and methods

To evaluate the effectiveness of claims-making strategies on behalf of undocumented immigrants, we conducted a survey experiment with a sample of 3123 California registered voters. Survey experiments embed the logic of experimental design within the survey framework. By randomly assigning respondents to different framings of a topic, we can estimate the causal effect of these frames on expressed attitudes and policy preferences (Mutz 2011). Our experiment was part of a larger multi-investigator on-line survey, broadly focused on political attitudes, sponsored by the University of California's Institute for Governmental Studies. The survey was fielded in English between 29 June and 15 July, 2016, with a sample recruited by Survey Sampling International (SSI) using quotas for gender and race/ethnicity.[1] By administering the survey online, we avoid interviewer effects and reduce social desirability bias (Chang and Krosnick 2009). Furthermore, online respondents generally provide more reliable answers than college students and telephone respondents (Behrend et al. 2011; Chang and Krosnick 2009).[2]

The demographic profile of the survey respondents, shown in Table 1, compares well to the population of California registered voters, as determined by 2016 data from the California Secretary of State and a probability sample of registered voters conducted by the Field Poll in 2014. Still, our survey participants had somewhat higher incomes, and were more likely to have a college degree and identify as Asian/Pacific Islander.[3] In supplementary analyses, our results are robust to these demographic differences.[4] Furthermore, since our experiment leverages random assignment *within* the sample, these differences do not threaten our ability to estimate the causal effect of framing for our sample of California voters.

Experimental design

Study participants were presented with three separate vignettes about women facing difficult situations, for a total of 9369 respondent-vignette observations.[5] To measure

Table 1. Framing experiment sample compared to representative Field Poll sample of California registered voters and data on party registration from the California Secretary of State.

	Framing experiment	Field poll
Gender		
Male	45%	47%
Female	55%	53%
Age		
18–24	11%	10%
25–34	21%	17%
35–49	22%	24%
50–64	26%	27%
≥65	20%	21%
Race/ethnicity		
White	54%	61%
Hispanic	23%	23%
African American	4%	6%
Asian/Pacific Islander	16%	7%
Other	3%	2%
Immigrant generation		
US-born, US-born parents	64%	
US-born, 1 US-born parent	10%	
US-born, foreign-born parents	14%	
Foreign-born	12%	
Education		
High school or less	10%	20%
Some college	28%	33%
College degree	35%	24%
Some graduate	7%	4%
Graduate degree	20%	18%
Household income		
<$20,000	9%	14%
$20,000–$39,999	16%	17%
$40,000–$59,999	16%	16%
$60,000–$99,999	29%	21%
≥$100,000	30%	24%
Party registration[a]		
Democratic	51%	45%
Republican	27%	28%
No party	20%	23%
Third party	2%	4%
Political ideology[b]		
Liberal	44%	
Moderate	29%	
Conservative	27%	

[a] Party registration comparison data is based on California Secretary of State records for May 2016.
[b] Ideology estimates are not comparable across surveys. Field Poll respondents indicated whether they were liberal, conservative, or 'middle-of-the-road,' whereas experiment participants reported their ideological identification on a seven-point scale from 'Extremely liberal' to 'Extremely conservative.' Further, 20% of Field Poll respondents (but only 3% of the experimental respondents) did not respond to the political ideology question. 'Liberal' respondents identify as 'slightly' to 'extremely' liberal, and 'Conservative' respondents identify as 'slightly' to 'extremely' conservative.

framing effects, participants were randomly assigned to one of three frames – American values, civil rights, or human rights – or to the control condition (no frame). For those in one of the three framing conditions, the following language introduced the vignettes: 'Some people argue that we have not done enough to uphold {American values/human rights/civil rights} in the United States. They believe that the situations in the following

three screens violate {American values/human rights/civil rights}. Please read the situation below and answer the following questions.' The framing remained constant across the three vignettes presented to the respondent. Immediately preceding the second and third vignettes, respondents were reminded – depending on their assigned framing condition – that 'Some people believe that the following situation violates {American values/human rights/civil rights}.' In the control condition, participants were simply asked to 'Please read the situation below and answer the following questions.'

To account for the possibility that frame resonance varies based on the specifics of a situation, each vignette highlighted a different hardship: food insecurity, lack of health care, or sexual harassment. To signal food insecurity, respondents were given a narrative like the following:

> Gabriela Martinez is an undocumented immigrant from Mexico living in California. She lives on a very low income. She frequently skips meals and eats smaller portions than is healthy. Sometimes she goes a day or longer without anything to eat.

To indicate serious illness and a lack of health care, respondents read that the woman 'has diabetes, but does not have insurance or money to pay for treatment. With treatment, she can lead a normal life. Without treatment, she faces blindness and other serious complications'. To probe responses to sexual harassment, respondents were told that the woman's 'male coworker frequently touches her in ways that make her uncomfortable. She has spoken with her manager about the issue but nothing has changed'. The hardship scenarios were presented in random order.

Using personalised vignettes allowed us to more easily manipulate the ethno-racial background and legal status of the women. Furthermore, since personal stories are a common tactic of immigrant advocates (Patler 2018), they may offer greater external validity. Recent research suggests that such narratives are more effective in changing attitudes than framing strategies that simply present information or explicitly attempt to motivate action (McEntire, Leiby, and Krain 2015). Thus, our design might find greater support for undocumented residents than alternative research designs.

In asking about hunger and health, we selected topics commonly identified as human rights issues. These vignettes build on a long line of public opinion research examining who should receive social benefits, a literature only recently extended to evaluating immigrant status (Bloemraad, Silva, and Voss 2016; Ford 2016). Our study goes beyond social benefits, however, to include government protection from harm, also a human rights issue, reflected in the sexual harassment vignette. We posit that public opinion about immigrants' access to workplace protections, including protection from sexual harassment, may be less politically contentious than access to food assistance or health care. Immigrants' use of public benefits has been subject to partisan debate in California for decades; workplace protections against sexual harassment have not.[6] Indeed, anti-discrimination and labour law largely apply to all U.S. residents regardless of legal status, an extension that might be relevant to civil rights claims-making.

Finally, we varied the characteristics of the woman described in the vignette, portraying her as a white American woman, an African-American woman, a Mexican-American woman, or an undocumented Mexican immigrant. Ethno-racial background and legal status were signalled using racially/ethnically distinctive names, explicitly noting each woman's race/ethnicity, her birthplace (California or Mexico) and, when applicable,

that she was undocumented.[7] Participants were randomly assigned to view vignettes featuring three of the four women. We randomised the order in which respondents read about each.

Given our interest in the influence of legal status and citizenship for frame resonance, and the known effect of race on U.S. public opinion toward social benefits (Fox 2004; Gilens 1999), the analysis here only compares scenarios featuring Mexican-origin women. Many Americans associate illegal immigration with Mexicans (Yee, Davis, and Patel 2016). Immigrants born in Mexico make up a plurality of all immigrants in California (40 percent; Migration Policy Institute 2015) and half of the U.S. undocumented population nationally (Krogstad, Passel, and Cohn 2017).

In sum, the experiment consisted of a between-subjects factor (framing), a within-subjects factor (the type of difficult situation), and a factor that is both a within-subjects and between-subjects factor (characteristics of the women in the vignettes). Approximately 200 respondents evaluated each combination of framing, situation, and woman affected. Figure 1 offers a visual representation of the study design. After restricting the sample to respondent-vignette observations featuring undocumented Mexican immigrants or Mexican-Americans, and deleting approximately 1% of respondent-vignette observations with missing information on the relevant outcome variable, our effective sample is 3468 respondent-vignette pairs for the analysis of violation agreement, and 4692 respondent-vignette pairings for the analysis of support for government action.[8]

Dependent variables

For respondents assigned to a framing treatment, we assess *violation agreement.* After reading each vignette, these respondents were asked to report the strength of their agreement on a five-point scale ('Strongly disagree' to 'Strongly agree') with the following statement: '{First Name's} situation violates {American values, human rights, civil rights}'. Violation agreement cannot be assessed for respondents in the control condition since they received no framing treatment.

We also assess support for *government action.* All participants, in the control and framing treatments, were asked about the strength of their agreement on a five-point scale ('Strongly disagree' to 'Strongly agree') with the following statements, depending on the scenario presented: 'The government should investigate sexual harassment in {First name's} workplace', 'The government should provide food assistance to {First name}', or 'The government should provide health care to {First name}'.
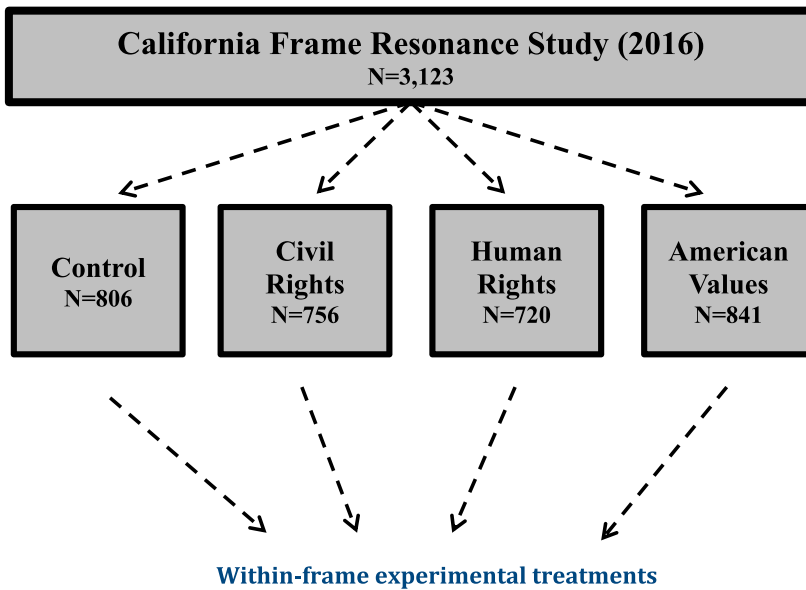
Considered together, these variables build on ideas of naming and claiming by distinguishing between agreement that a situation is problematic – for us, naming it a violation – and agreement with the claim that government should do something to address the problem. We expect naming and claiming to be strongly correlated: if someone believes a situation is a violation of civil rights, human rights, or American values, they will be much more likely to support government action.

Analytic approach

We use ordered logistic regressions to model violation agreement and support for government action since both outcomes are ordinal variables. In addition to including indicators

Between-person experimental framing treatment

(via random assignment)

California Frame Resonance Study (2016)
N=3,123

| Control N=806 | Civil Rights N=756 | Human Rights N=720 | American Values N=841 |

Within-frame experimental treatments

(respondents read each of three scenarios, in which vignettes described women with three of four race/ nativity combinations, assigned randomly)

	Food scarcity	Lack of Health care	Sexual harassment
White American	N ~ 200 per frame	N ~ 200 per frame	N ~ 200 per frame
African American	N ~ 200 per frame	N ~ 200 per frame	N ~ 200 per frame

Figure 1. Experimental set-up.

for each frame, the models include controls for the type of difficulty, vignette order, and the name of the woman (Maria Rodriguez vs. Gabriela Martinez). We present regressions separately for vignettes featuring undocumented immigrants and Mexican-American citizens. Additionally, to estimate the undocumented penalty and to examine whether frames have a differential effect for undocumented immigrants compared to Mexican-American citizens, we estimated single models that include each predictor (frame, type of difficulty, order, name) and legal status, as well as the interaction of each predictor with legal status. The interactions allow us to test for differences in the coefficients by legal status.

Following standard survey experimental design (Mutz 2011), we do not control for respondent characteristics. The registered California voters who answered our survey were randomly assigned to the experimental conditions. Consequently, respondent

characteristics likely to correlate with the outcome variables should be balanced (subject to chance variability) across treatments. In models with vignettes featuring both undocumented immigrants and Mexican-American citizens, we cluster standard errors by respondent.

Findings: the limits of rights, the possibility of inclusive American values

Identifying the problem: violation agreement

First, we examine *violation agreement*. Research in the fields of law and society and social movements indicates that 'naming' – for us, agreeing that a situation represents a violation of rights or values – is a critical first step to action. Aggregating across framings and scenarios, we find that respondents express greater agreement that a situation of insufficient food, serious health problems, or sexual harassment represents a violation of rights or values if it involves a Mexican-American citizen than a Mexican undocumented immigrant ($z = 4.4$; $p < .001$). For instance, while 39% of respondents strongly agreed that scenarios involving a Mexican-American citizen represent violations, the percentage falls to 32% if the same scenarios involve a Mexican undocumented immigrant. This undocumented penalty holds across many sub-groups of California voters, including men, women, liberals, and conservatives (see Table 2).

These aggregated results underscore the impact of legal status on violation agreement among California voters. They do not, however, clarify the possible impact of framing on the undocumented penalty. Human rights frame may be more inclusive of undocumented immigrants than the other frames. If borne out, we should find a weaker legal status difference in this framing condition.

Indeed, consistent with expectations, the human rights frame is more inclusive of undocumented immigrants than the American values and civil rights frames. Table 3 presents ordered logistic regressions predicting violation agreement, for undocumented Mexican immigrants and Mexican-American citizens. Figure 2 presents predicted probabilities based on a single model that includes scenarios with undocumented immigrants and Mexican-Americans. The human rights coefficient (relative to both civil rights and to American values) is significantly more positive in the undocumented immigrant condition than in the Mexican-American condition ($p < .05$). Indeed, the undocumented penalty *disappears* in the human rights condition: respondents are no less likely to consider a scenario a human rights violation if it involves an undocumented immigrant than a citizen ($z = 0.6$; $p > .5$). In contrast, we find a strong, statistically significant undocumented penalty in the American values ($z = 3.0$; $p < .01$) and civil rights ($z = 3.6$; $p < .001$) conditions. Respondents more readily agree that a scenario is a violation of civil rights or American values when it features a citizen than an undocumented migrant.

The human rights framing result is in line with scholarly expectations, but we underscore another finding that touches on the limitation of a human rights frame: respondents report somewhat *weaker* agreement that scenarios violate human rights than American values. Indeed, respondents express significantly ($p < .001$) weaker agreement that vignettes featuring Mexican Americans violate human rights than American values, and insignificantly ($p = .14$)   weaker agreement that vignettes featuring

Table 2. Mean of violation agreement, by respondent characteristics.

	Undocumented Mexican immigrant	Mexican-American U.S. citizen	Difference
All	3.45	3.64	−0.19***
Gender[a]			
Male	3.30	3.45	−0.15*
Female	3.57	3.79	−0.22***
Age[a]			
18–24	3.73	3.77	−0.04
25–34	3.53	3.68	−0.15+
35–49	3.44	3.57	−0.13
50–64	3.29	3.61	−0.32***
≥65	3.42	3.62	−0.20+
Race/ethnicity[a]			
White	3.38	3.62	−0.24***
Hispanic	3.58	3.72	−0.14
African American	3.67	3.59	0.08
Asian/Pacific Islander	3.45	3.61	−0.16
Other	3.46	3.35	0.11
Immigrant generation[a]			
US-born, US-born parents	3.39	3.57	−0.18**
US-born, 1 US-born parent	3.53	3.74	−0.21
US-born, foreign-born parents	3.60	3.81	−0.21+
Foreign-born	3.60	3.73	−0.13
Education[a]			
High school or less	3.46	3.82	−0.36*
Some college	3.41	3.61	−0.20*
College degree	3.42	3.68	−0.26***
Some graduate	3.69	3.58	0.11
Graduate degree	3.43	3.51	−0.08
Household income[a]			
<$20,000	3.44	3.86	−0.42**
$20,000–$39,999	3.66	3.88	−0.22*
$40,000–$59,999	3.39	3.54	−0.15
$60,000–$99,999	3.36	3.64	−0.28**
≥$100,000	3.44	3.50	−0.06
Party registration[a]			
Democratic	3.63	3.78	−0.15*
Republican	3.08	3.40	−0.32+
Third party	3.43	3.63	−0.20*
Other	3.84	3.35	0.49+
Political ideology[a]			
Liberal	3.75	3.85	−0.10+
Moderate	3.31	3.56	−0.25**
Conservative	3.13	3.38	−0.25*

[a] These variables have a significant effect on violation agreement on behalf of undocumented immigrants. Using ordered logistic regressions, we find women express greater agreement than men ($p < .001$). Respondents who are 18–24 express greater agreement than respondents who are 35–49 ($p < .05$), 50–64 ($p < .05$) and 65 and older ($p < .01$). Hispanics express significantly greater agreement than whites ($p < .05$). Individuals who are US-born with foreign-born parents express greater agreement than individuals who are US-born to US-born parents ($p < .05$). Individuals who attained some graduate education express greater agreement than college graduates ($p < .05$). Individuals with household income between $20,000 and $40,000 express greater agreement than individuals with incomes above $40,000 and below $100,000 ($p < .01$). Liberals express significantly greater agreement than moderates ($p < .001$) and conservatives ($p < .001$). Registered democrats express significantly greater agreement than registered republicans ($p < .001$) and independent voters ($p < .05$).
+ $p < .1$; *$p < .05$; **$p < .01$; ***$p < .001$; two-tailed *t*-tests for mean difference, standard errors clustered by respondent. Results are almost identical if we use z-tests from ordered logistic regressions instead of *t*-tests.

undocumented immigrants violate human rights than American values. Thus, although the human rights frame is more *inclusive* of undocumented immigrants than the American values frame, it is no more *effective* in eliciting agreement to name these hardships as violations.

Table 3. Ordered logistic regressions of violation agreement.

	Undocumented Mexican immigrant	Mexican-American U.S. citizen
Framing (Ref: civil rights)		
Human rights	0.66***[aab]	0.34**
	(0.11)	(0.11)
American values	0.81***	0.81***
	(0.11)	(0.11)
Difficulty (Ref: sexual harassment)		
Food insecurity	−1.78***	−1.76***
	(0.12)	(0.12)
Health care	−1.82***[bb]	−1.58***
	(0.12)	(0.12)
N (respondents)	1708	1760
Pseudo R^2	0.076	0.069

Notes: Coefficients with standard errors in parentheses. Baseline vignette assigned to civil rights frame, focused on sexual harassment, and was presented first. Models also control for the name of the women in the scenario (Maria Rodriguez vs. Gabriela Martinez) and the order in which the vignette was presented. Cut points omitted.
[aa] $p < .05$; coefficient is significantly different than US citizen coefficient (two-tailed tests); standard errors clustered at respondent-level.
[bb] $p < .05$, [b] $p < .1$; coefficient is significantly different than US citizen coefficient, (two-tailed tests); based on an OLS regression to account for difficulties interpreting interactions in logistic regressions; standard errors clustered at respondent-level.
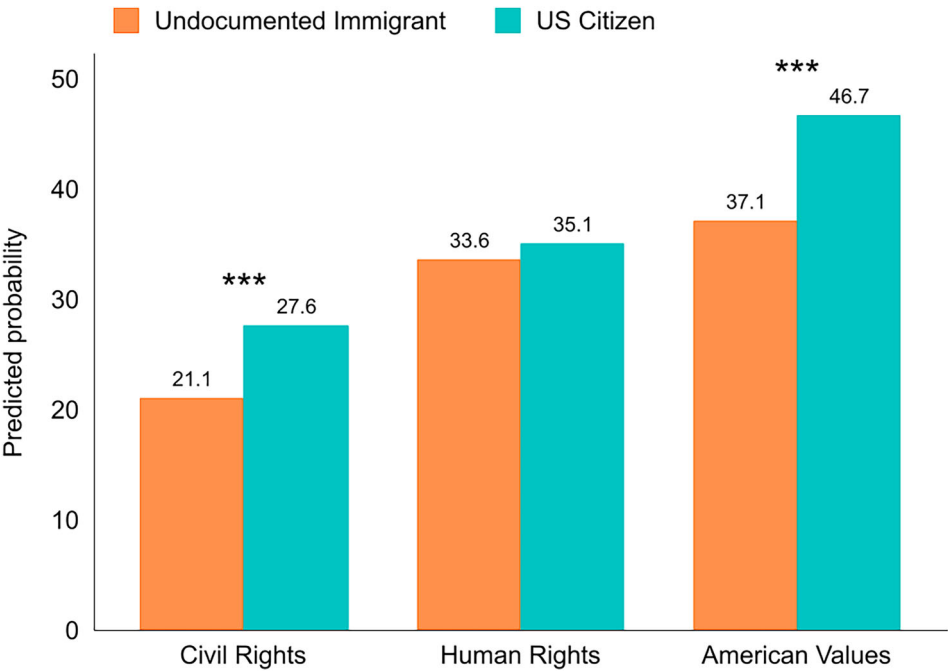*** $p < .001$, ** $p < .01$, * $p < .05$, + $p < .1$, (two-tailed tests)

Figure 2. Predicted probability of 'strongly' agreeing that a scenario violates American values, civil rights, or human rights, by legal status of Mexican-origin person facing difficulty.

Note: Predicted probabilities derived from an ordered logistic regression model of violation agreement with four predictors (frame, type of difficulty, order, name), legal status, and the interaction of each predictor with legal status. Standard errors clustered at respondent level. *** $p < .001$, two-tailed tests.

Finally, regardless of whether scenarios feature Mexican Americans or undocumented immigrants, respondents express weaker agreement that scenarios violate civil rights than human rights or American values ($p < .01$). Thus, contrary to our expectations, the limited salience of civil rights appeals on behalf of undocumented immigrants does not appear to be primarily due to their noncitizenship.[9] For citizens and noncitizens alike, respondents are relatively sceptical that sexual harassment, food insecurity, or lack of access to health care represent civil rights violations. This is a broader limitation to the civil rights frame than expected.

Supporting a solution: government action

We also investigate support for *government action.* Absent any framing, respondents in the control condition are much less supportive of government action on behalf of undocumented Mexican immigrants than Mexican-American citizens ($z = 7.1$; $p < .001$). While almost half (49%) of respondents strongly agreed that the government should act on behalf of Mexican Americans, only about a third (35%) strongly agreed that the government should act on behalf of undocumented immigrants. Further, while the extent of the undocumented immigrant penalty varies by sub-groups of the population – for instance, liberals penalise undocumented status less than conservatives – almost all subgroups are significantly less supportive of government action on behalf of undocumented immigrants than American citizens (see Table 4). Relative to violation agreement, the undocumented penalty for government action is stronger and more widely shared. Overall, California voters of diverse backgrounds view undocumented immigrants as 'categorically unequal' with respect to government action.

Does framing affect support for government action? Table 5 presents ordered logistic regressions predicting strength of agreement with government action for vignettes involving undocumented Mexican immigrants and Mexican-American citizens separately. Figure 3 presents predicted probabilities based on a single model. We find that neither American values, civil rights, nor human rights frames significantly influence California voters' support for government action on behalf of undocumented immigrants (or Mexican Americans), relative to the control condition. Thus, despite the seeming inclusivity of the human rights frame, support for government action on behalf of undocumented immigrants is essentially unaffected by human rights framing ($z = 0.3$; $p = .8$). This finding is sobering for those who see promise in human rights language. Strikingly, as with violation agreement, respondents exposed to the American values frame express the *most* support for government action and those exposed to the civil rights frame express the *least* support for government action. Indeed, relative to the American values frame, the civil rights frame significantly decreases support for government action, on behalf of immigrants ($z = 2.5$; $p < .05$) and Mexican Americans ($z = 2.0$; $p < .05$).

Finally, we expected that there would be a strong correlation between violation agreement and support for government action. This is largely the case. However, the link between the two is imperfect, and weaker for vignettes involving a citizen (corr. 0.45) than an undocumented immigrant (corr. 0.55). The difference appears to stem from respondents' relatively high support for government action on behalf of fellow citizens, even when they disagree that a scenario represents a violation. For instance, among respondents who strongly *disagree* that a scenario represents a violation, 33% nevertheless

Table 4. Mean support for government action in the control condition, by respondent characteristics.

	Undocumented Mexican immigrant	Mexican-American U.S. citizen	Difference
All	3.54	4.11	−0.57***
Gender			
Male	3.47	4.03	−0.56***
Female	3.59	4.15	−0.56***
Age[a]			
18–24	3.91	4.15	−0.24
25–34	3.70	4.02	−0.32*
35–49	3.52	4.17	−0.65***
50–64	3.46	4.10	−0.64***
≥65	3.30	4.07	−0.77***
Race/ethnicity			
White	3.49	4.05	−0.56***
Hispanic	3.68	4.11	−0.43**
African American	3.55	4.48	−0.93**
Asian/Pacific Islander	3.43	4.11	−0.68***
Other	3.31	4.05	−0.74*
Immigrant generation[a]			
US-born, US-born parents	3.45	4.09	−0.64***
US-born, 1 US-born parent	3.48	3.90	−0.42*
US-born, foreign-born parents	4.09	4.17	−0.08
Foreign-born	3.39	4.24	−0.85***
Education			
High school or less	3.57	3.97	−0.40+
Some college	3.42	3.94	−0.52***
College degree	3.42	4.17	−0.75***
Some graduate	3.20	4.15	−0.95***
Graduate degree	3.81	4.22	−0.41**
Household income			
<$20,000	3.63	4.06	−0.43+
$20,000–$39,999	3.67	4.40	−0.73***
$40,000–$59,999	3.42	3.83	−0.41*
$60,000–$99,999	3.46	4.17	−0.71***
≥$100,000	3.51	4.06	−0.55***
Party registration[a]			
Democratic	3.90	4.39	−0.49***
Republican	3.08	3.84	−0.76***
No party	3.35	3.85	−0.50**
Third party	2.60	3.33	−0.73
Political ideology[a]			
Liberal	4.04	4.42	−0.38***
Moderate	3.44	3.88	−0.44***
Conservative	2.85	3.84	−0.99***

[a] These variables have a significant effect on support for government action for undocumented immigrants. Using ordered logistic regressions, liberals are significantly more supportive than moderates ($p < .001$) and conservatives ($p < .001$). Registered democrats are significantly more supportive than registered republicans ($p < .001$), individuals with a third party registration ($p < .01$), and independent voters ($p < .001$). Respondents who are 18–24 are more supportive than respondents who are 50–64 ($p < .05$) and 65 and older ($p < .01$). Individuals who are US-born with foreign-born parents are more supportive than individuals belonging to other immigrant generations ($p < .001$). Respondents with graduate degrees are more supportive than respondents with some college ($p < .05$) or some graduate education ($p < .05$), and college graduates ($p < .05$).

+ $p < .1$; *$p < .05$; **$p < .01$; ***$p < .001$; two-tailed t-tests for mean difference, standard errors clustered by respondent. Results are almost identical if we use z-tests from ordered logistic regressions instead of t-tests.

strongly support government action on behalf of a Mexican-American citizen; only 14% strongly support government action on behalf of an undocumented immigrant. Perhaps respondents see the hardships we describe in terms other than civil rights, human rights or American values. Or they may believe that government should help citizens in distress, irrespective of how a problem is named or framed. Alternatively, violations

Table 5. Ordered logistic regressions of support for government action.

	Undocumented Mexican immigrant	Mexican-American U.S. citizen
Framing (Ref: control)		
Civil rights	−0.16	−0.09
	(0.11)	(0.11)
Human rights	−0.03	−0.07
	(0.11)	(0.11)
American values	0.11	0.13
	(0.10)	(0.11)
Difficulty (Ref: Sexual harassment)		
Food insecurity	−1.57***[aaaa][bbbb]	−0.59***
	(0.10)	(0.10)
Health care	−1.65***[aaaa][bbbb]	−0.51***
	(0.10)	(0.10)
N (Respondents)	2316	2376
Pseudo R^2	0.054	0.010

Notes: Coefficients with standard errors in parentheses. Baseline vignette assigned to control condition, focused on sexual harassment, and was presented first. Models include controls for the name of the women in the scenario (Maria Rodriguez vs. Gabriela Martinez) and the order in which the vignette was presented. Cut points omitted. *** $p < .001$; ** $p < .01$, * $p < .05$, two-tailed tests.
[aaaa] $p < .001$; coefficient is significantly different than US citizen coefficient (two-tailed tests); standard errors clustered at respondent-level.
[bbbb] $p < .001$; coefficient is significantly different than US citizen coefficient, (two-tailed tests); based on an OLS regression to account for difficulties interpreting interactions in logistic regressions; standard errors clustered at respondent-level.
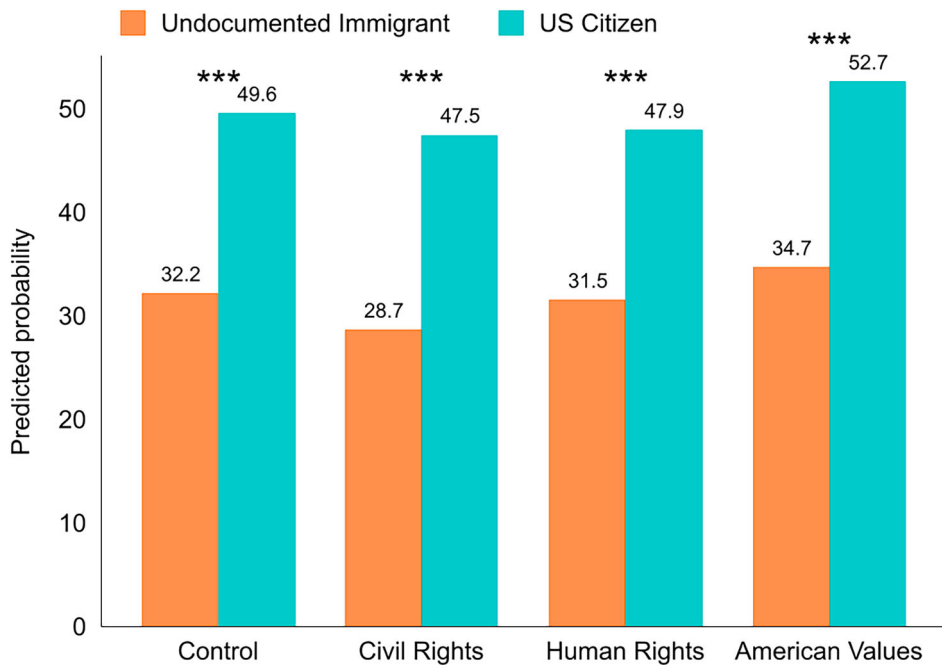
Figure 3. Predicted probability of 'strongly' agreeing that a scenario warrants government action, by frame and legal status of Mexican-origin person facing difficulty.

Note: Predicted probabilities derived from an ordered logistic regression model of government action with four predictors (frame, type of difficulty, order, name), legal status, and the interaction of each predictor with legal status. *** $p < .001$, two-tailed tests.

may be judged on more universalist criteria, but legal status or citizenship becomes important in evaluating whether government action is warranted.

Heterogeneous effects: negative rights, race, and ideology

Our discussion thus far has not differentiated across the experimental scenarios nor examined the possibility of differential framing effects among respondent sub-groups. We now turn to such heterogeneity for a more nuanced picture of frame resonance.

All hardships are not the same: tackling food insecurity, health care and sexual harassment

The survey experiment portrayed three hardships: hunger, illness, and workplace sexual harassment. Questions about poverty and health care tap into a long line of scholarship on public opinion and social benefits; in the United States, policy over social benefits is highly politicised and racialized (Fox 2004; Gilens 1999). We know less about public opinion on sexual harassment. Indeed, to our knowledge, no prior study has examined whether a person's legal status affects the public's judgements about sexual harassment.

We find that respondents express violation agreement and greater support for government action in the sexual harassment scenario than in the food or health scenarios ($p < .001$) (see Tables 3 and 5). But, in the case of government action, the difference between scenarios is much stronger for undocumented immigrants. Consequently, despite a strong penalty against government action for undocumented immigrants in the food and health scenarios ($p < .001$), there is *no* undocumented penalty in the sexual harassment scenario ($p > .8$). Indeed, the predicted probability of strongly agreeing that the government should investigate the sexual harassment claim is 59% in the case of undocumented immigrants and 58% in the case of Mexican Americans (see Figure 4). We find similar high levels of agreement that sexual harassment scenarios represent violations, although the undocumented penalty remains marginally significant ($p < .1$). In supplementary analyses, we find limited evidence of differential frame resonance by type of hardship.[10]

Overall, these findings highlight that certain claims made on behalf of undocumented immigrants – here, that government action is warranted in the case of sexual harassment – are perceived as equally valid to those made on behalf of U.S. citizens. As we discuss in the conclusion, it is unclear whether sexual harassment is judged differently because there is a clear perpetrator in our experiment (i.e. someone at work is behaving wrongly), because government action would ensure a negative right (e.g. freedom from harassment, rather than access to a public benefit), or something else.

Frame resonance and respondent characteristics: ethno-racial background and political outlook

Do the undocumented immigrant penalty and frame resonance differ by *respondents'* characteristics? Previous research finds that race and ethnicity structure the public's understanding of immigration policy (Masuoka and Junn 2013), and political ideology might have modest effects on frame resonance for immigration issues (Bloemraad, Silva, and Voss 2016). Given the demographics of California and sample recruitment,
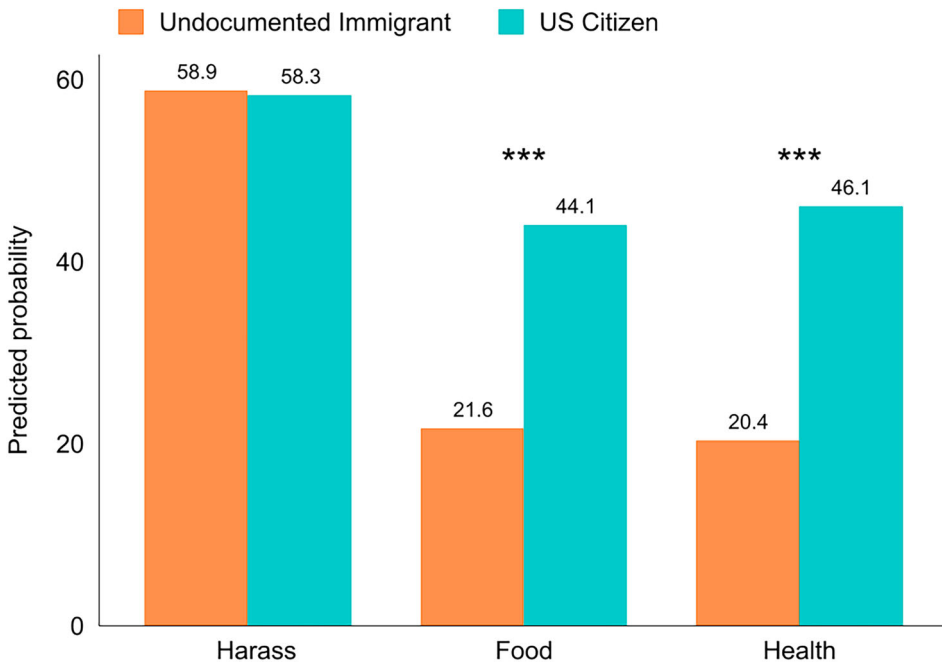
Figure 4. Predicted probability of 'strongly' agreeing that a scenario warrants government action, by type of difficulty and legal status of Mexican-origin person facing difficulty.

Note: Predicted probabilities derived from an ordered logistic regression model of government action with four predictors (frame, type of difficulty, order, name), legal status, and the interaction of each predictor with legal status. Standard errors clustered at respondent level. *** $p < .001$, two-tailed tests.

we have sufficient numbers of white, Latino, and Asian/Pacific Islander respondents, and liberal, moderate, and conservative respondents, to examine possible variation.

First, we find that while white, Latino, and Asian/Pacific Islander respondents were *all* significantly less supportive of government action on behalf of undocumented immigrants than citizens, white respondents penalised undocumented status more than Latinos ($p < .01$) and marginally more than Asian/Pacific Islander respondents ($p < .1$).[11] Second, all three ethno-racial groups express relatively weak agreement that scenarios violate civil rights, but white respondents respond most negatively to the civil rights frame, especially when evaluating scenarios featuring undocumented immigrants. Relative to Latinos ($p < .01$) and Asian/Pacific Islanders ($p < .1$), whites express weaker agreement that scenarios featuring undocumented immigrants represent civil rights violations than American values violations (Table 6). Furthermore, whites were significantly less supportive of government action on behalf of undocumented immigrants when exposed to the civil rights frame than to the control condition ($p < .01$); in contrast, the civil rights frame had a positive (but insignificant) effect on Latino and Asian/Pacific Islander support for government action on behalf of undocumented immigrants (see Table 7 and Figure 5).

We also examined the possible effects of respondents' political ideology. We find, in expressing support for government action, that conservatives penalise undocumented status more than liberals ($p < .001$).[12] But evidence for differential frame resonance by

Table 6. Ordered logistic regressions of violation agreement, by respondent ethno-racial background.

	Respondent ethno-racial background		
	White	Latino	Asian/PI
Legal status: U.S. citizen	0.51***	0.00[aabb]	0.47*
	(0.14)	(0.22)	(0.21)
Framing (Ref: civil rights)			
Human rights	0.70***	0.34	0.75**
	(0.15)	(0.23)	(0.26)
American values	1.07***	0.17[aaaabbb]	0.61*[ab]
	(0.14)	(0.22)	(0.26)
Framing × legal status			
Human rights × U.S. citizen	−0.34+	−0.19	−0.47
	(0.19)	(0.30)	(0.31)
American values × U.S. citizen	−0.02	0.48+	−0.32
	(0.19)	(0.28)	(0.31)
Difficulty (Ref: sexual harassment)			
Food insecurity	−1.80***	−1.47***[a]	−1.90***
	(0.11)	(0.16)	(0.20)
Health care	−1.66***	−1.46***	−1.87***
	(0.11)	(0.17)	(0.19)
N (Respondents)	1223	526	397
N (Observations)	1814	800	597
Pseudo R^2	0.081	0.055	0.074

Notes: Coefficients with standard errors in parentheses. Baseline vignette featured undocumented immigrant, was assigned to civil rights frame, focused on sexual harassment, and was presented first. Models include controls for the name of the women in the scenario (Maria Rodriguez vs. Gabriela Martinez) and the order in which the vignette was presented. Cut points omitted. *** $p < .001$; ** $p < .01$, * $p < .05$, two-tailed tests
[aaaa] $p < .001$; [aaa] $p < .01$, [aa] $p < .05$, [a] $p < .1$; coefficient is significantly different than white coefficient (two-tailed tests); standard errors clustered at respondent-level.
[bbbb] $p < .001$; [bbb] $p < .01$, [bb] $p < .05$, [b] $p < .1$; coefficient is significantly different than white coefficient, (two-tailed tests); based on an OLS regression to account for difficulties interpreting interactions in logistic regressions; standard errors clustered at respondent-level.

political ideology is weak. Some scholars suggest that rights appeals based on egalitarianism and universalism may be more resonant with liberals, while the patriotic language of American values may be more resonant with conservatives (e.g. Miles and Vaisey 2015). In scenarios involving undocumented immigrants (but not Mexican Americans), the civil rights frame does decrease violation agreement significantly more for conservatives than liberals, relative to the American values frame ($p < .05$) (Table 8). However, to our surprise, even liberals express weaker agreement that scenarios – featuring undocumented immigrants and U.S. citizens – violate civil rights than American values ($p < .001$) and human rights ($p < .001$ for immigrants; $p < .1$ for U.S. citizens). Liberals, moderates, and conservatives *all* express significantly stronger agreement that scenarios violate American values and human rights than civil rights. Furthermore, liberals express significantly weaker support for government action on behalf of undocumented immigrants in the civil rights condition than in the control ($p < .05$) and American values ($p < .001$) conditions (Table 9). Thus, instead of increasing support for government action on behalf of undocumented immigrants, the civil rights frame led to a backlash among liberals.

Conclusion: the limits of rights, the potential of American values

For years, activists have sought an effective way to make claims on behalf of millions of noncitizens residing in the United States, especially those who are undocumented. They

Table 7. Ordered logistic regressions of government action, by respondent ethno-racial background.

	Respondent ethno-racial background		
	White	Hispanic	Asian/PI
Legal status: U.S. Citizen	0.77***	0.62**	0.76**
	(0.13)	(0.20)	(0.24)
Framing (Ref: control)			
Civil rights	−0.38**	0.07[ab]	0.13
	(0.15)	(0.23)	(0.28)
Human rights	−0.12	0.14	0.32
	(0.15)	(0.23)	(0.28)
American values	−0.06	0.28	0.39
	(0.15)	(0.22)	(0.27)
Framing × legal status			
Civil rights × U.S. citizen	0.28	−0.14	0.10
	(0.18)	(0.28)	(0.32)
Human rights × U.S. citizen	0.06	−0.35	−0.02
	(0.19)	(0.29)	(0.34)
American values × U.S. citizen	0.25	−0.00	−0.26
	(0.19)	(0.28)	(0.32)
Difficulty (Ref: sexual harassment)			
Food insecurity	−1.15***	−0.92***[bb]	−1.20***
	(0.10)	(0.14)	(0.17)
Health care	−1.17***	−0.85***[abbb]	−1.14***
	(0.10)	(0.15)	(0.16)
N (Respondents)	1,645	723	508
N (Observations)	2,465	1,090	765
Pseudo R^2	0.049	0.029	0.048

Notes: Coefficients with standard errors in parentheses. Baseline vignette featured undocumented immigrant, was assigned to the control condition, and focused on sexual harassment. Models include controls for the name of the women in the scenario (Maria Rodriguez vs. Gabriela Martinez) and the order in which the vignette was presented. Cut points omitted.
*** $p < .001$; ** $p < .01$, * $p < .05$, two-tailed tests
[aaaa] $p < .001$; [aaa] $p < .01$, [aa] $p < .05$, [a] $p < .1$; coefficient is significantly different than white coefficient (two-tailed tests); standard errors clustered at respondent-level.
[bbbb] $p < .001$; [bbb] $p < .01$, [bb] $p < .05$, [b] $p < .1$; coefficient is significantly different than white coefficient, (two-tailed tests); based on an OLS regression to account for difficulties interpreting interactions in logistic regressions; standard errors clustered at respondent-level.

have frequently turned to rights language, arguing in the vocabulary of human rights that 'no human is illegal', or in terms borrowed from the civil rights movement, that 'immigrant rights are civil rights'. Those who mobilise to oppose these claims often embrace nationalistic, exclusionary language, including appeals to American values. Immigrant advocates contest such framing by articulating an Americanism that embraces immigrants. Existing scholarship tells us little about whether rights claims or appeals to 'American values' resonate with voters and affect their willingness to acknowledge challenges faced by noncitizens or to support government action to help immigrants. Using a survey experiment, we evaluated these frames' resonance in situations involving hunger, serious illness, and sexual harassment.

Our analysis highlights the barriers confronting the pro-immigrant movement. California voters, regardless of framing, were less supportive of government action on behalf of undocumented Mexican immigrants than Mexican-American citizens. The extent of this undocumented penalty varied – for instance, Latinos penalized undocumented status less than whites, and liberals penalized it less than conservatives – but the great majority of sub-groups treated undocumented immigrants as 'categorically unequal'.

Rights claims did little to mitigate this categorical inequality. Appeals to human rights were effective for getting Americans to recognise violations of the rights of undocumented
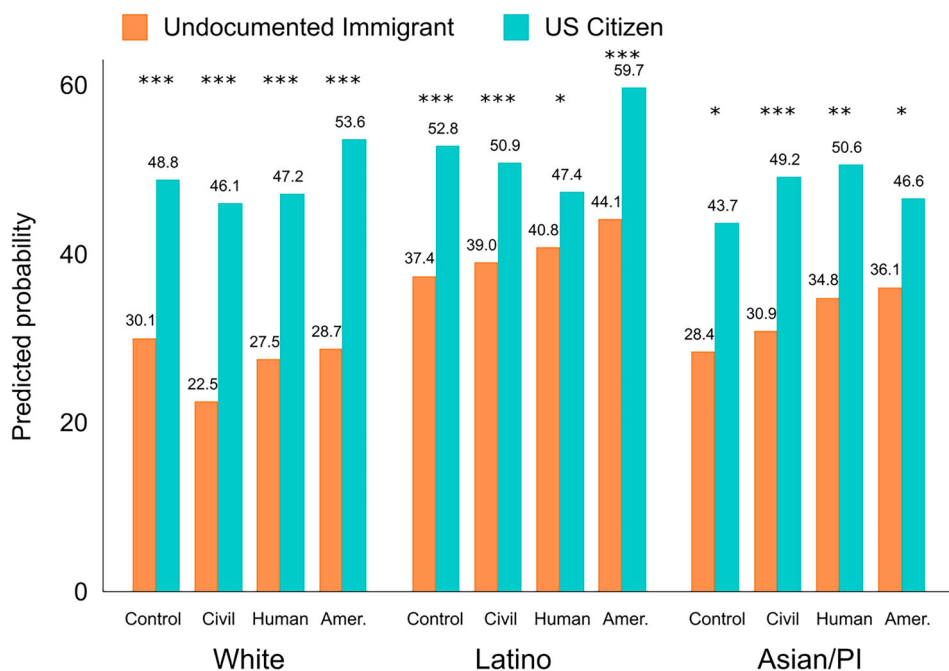
Figure 5. Predicted probability of 'strongly' agreeing that a scenario warrants government action, by frame, legal status of Mexican-origin person facing difficulty, and respondents' self-identified ethno-racial background.

Note: Predicted probabilities derived from an ordered logistic regression model of government action with six predictors (legal status, frame, interaction between legal status and frame, type of difficulty, order, name), respondent ethno-racial background, and the interaction of each predictor with respondent ethno-racial background. Standard errors clustered at respondent level. *** $p < .001$; ** $p < .01$; * $p < .05$, two-tailed tests.

immigrants – or, at least, not to make distinctions between citizens and noncitizens – but such appeals did not move respondents to support government action to provide basic human needs such as food and healthcare. Within the limited empirical scholarship examining the effects of human rights discourses on the public's views of immigrants and asylees, a few U.S. studies hint at narrow or no effects (Bloemraad, Silva, and Voss 2016; Fujiwara 2005). It is unclear whether the failure of human rights language lies in a particular distaste among the American public – perhaps human rights are associated with internationalist orientations or viewed as inappropriate given the U.S. Constitution – or whether public scepticism of human rights is more general and holds in other societies. Controversy in spring 2018 over a German foodbank's decision to demand a German passport for new clients, thereby barring many migrants, suggests the question is germane in other countries.[13]

A civil rights framing, despite being a discourse historically powerful in the United States, had even more limited effectiveness. Respondents exposed to the civil rights frame expressed the *weakest* agreement that scenarios represented violations and warranted government action, regardless of whether they featured undocumented Mexican immigrants or Mexican-American citizens. Thus, contrary to our expectations, the limited resonance of civil rights appeals does not appear to primarily centre on non-citizenship. Furthermore, the civil rights frame was ineffective for conservatives, moderates,

Table 8. Ordered logistic regressions of violation agreement, by respondent political ideology.

	Respondent political ideology		
	Liberal	Moderate	Conservative
Legal status: U.S. citizen	0.22	0.52**	0.46*
	(0.14)	(0.18)	(0.22)
Framing (Ref: civil rights)			
Human rights	0.55***	0.77***	0.91**
	(0.17)	(0.21)	(0.22)
American values	0.58***	0.90***	1.21***aabbb
	(0.16)	(0.19)	(0.22)
Framing × legal status			
Human rights × U.S. citizen	−0.23	−0.41	−0.36
	(0.20)	(0.26)	(0.30)
American values × U.S. citizen	0.24	−0.09	−0.02
	(0.21)	(0.25)	(0.29)
Difficulty (Ref: sexual harassment)			
Food insecurity	−1.77***	−1.40***aa	−2.31***aaabbbb
	(0.13)	(0.15)	(0.16)
Health care	−1.79***	−1.44***aa	−2.07***bbb
	(0.12)	(0.15)	(0.16)
N (Respondents)	1003	654	604
N (Observations)	1507	974	910
Pseudo R^2	0.074	0.061	0.111

Notes: Coefficients with standard errors in parentheses. Baseline vignette featured undocumented immigrant, was assigned to civil rights frame, and focused on sexual harassment. Models include controls for the name of the women in the scenario (Maria Rodriguez vs. Gabriela Martinez) and the order in which the vignette was presented. Cut points omitted.
*** $p < .001$; ** $p < .01$, * $p < .05$, two-tailed tests
aaaa $p < .001$; aaa $p < .01$, aa $p < .05$, a $p < .1$; coefficient is significantly different than liberal coefficient (two-tailed tests); standard errors clustered at respondent-level.
bbbb $p < .001$; bbb $p < .01$, bb $p < .05$, b $p < .1$; coefficient is significantly different than liberal coefficient, (two-tailed tests); based on an OLS regression to account for difficulties interpreting interactions in logistic regressions; standard errors clustered at respondent-level.

and liberals; and led whites and liberals to support less government action on behalf of undocumented immigrants than the control condition. These findings hint that the civil rights frame may be exhausted, or even provokes backlash among some segments of the public.

Contrary to our expectations, an American values frame produced the *strongest* agreement that a scenario describing hardship for an undocumented woman is a violation and merits government action. We explored this finding by examining responses to an open-ended question about what comes to mind in reading the term 'American values', a question asked of those in the control condition of our experiment.[14] The term seemed to evoke moral ideals and emotional reactions that could have nudged people to more inclusive attitudes. We also see hints that the 'American values' frame may be sufficiently elastic to appeal to voters of distinct political orientations. This is an intriguing result given the contemporary use of national values by far-right populists who attack immigration. The more inclusive potential of a 'national values' discourse requires further research.

Finally, the type of hardships mattered. One could argue that food insecurity, lack of health care and sexual harassment are all assaults on human welfare and dignity. However, although we found a substantial undocumented penalty for women facing hunger or serious illness, no such penalty existed for support of government action to stop sexual harassment. Here legal status is no barrier to claims-making.

This unanticipated result requires further study. It may be that respondents are more supportive of 'negative rights' – that is, government intervention to protect someone

Table 9. Ordered logistic regressions of government action, by respondent political ideology.

	Respondent political ideology:		
	Liberal	Moderate	Conservative
Legal status: U.S. citizen	0.75***	0.66***	1.23***aabbbb
	(0.16)	(0.18)	(0.19)
Framing (Ref: control)			
Civil rights	−0.33*	−0.15	−0.12
	(0.16)	(0.21)	(0.21)
Human rights	−0.11	−0.06	0.19
	(0.17)	(0.20)	(0.21)
American values	0.20	0.10	−0.02
	(0.16)	(0.20)	(0.21)
Framing × legal status			
Civil rights × U.S. citizen	0.04	0.11	0.11
	(0.22)	(0.25)	(0.27)
Human rights × U.S. citizen	−0.10	0.26	−0.37
	(0.22)	(0.26)	(0.26)
American values × U.S. citizen	−0.11	0.26	−0.01
	(0.22)	(0.26)	(0.26)
Difficulty (Ref: sexual harassment)			
Food insecurity	−1.11***	−0.87***	−1.64***aaaabbbb
	(0.11)	(0.13)	(0.14)
Health care	−1.00***	−1.02***b	−1.64***aaaabbbb
	(0.11)	(0.14)	(0.14)
N (Respondents)	1350	881	825
N (Observations)	2014	1324	1261
Pseudo R^2	0.044	0.035	0.083

Notes: Coefficients with standard errors in parentheses. Baseline vignette featured undocumented immigrant, was assigned to the control condition, and focused on sexual harassment. Models include controls for the name of the women in the scenario (Maria Rodriguez vs. Gabriela Martinez) and the order in which the vignette was presented. Cut points omitted.
*** $p < .001$; ** $p < .01$, * $p < .05$, two-tailed tests
aaaa $p < .001$; aaa $p < .01$, aa $p < 0.05$, a $p < .1$; coefficient is significantly different than liberal coefficient (two-tailed tests); standard errors clustered at respondent-level.
bbbb $p < .001$; bbb $p < .01$, bb $p < .05$, b $p < .1$; coefficient is significantly different than liberal coefficient, (two-tailed tests); based on an OLS regression to account for difficulties interpreting interactions in logistic regressions; standard errors clustered at respondent-level.

from assault or ensure their liberty – irrespective of citizenship status than they are of 'positive' rights, i.e. entitlement to food and healthcare. Or, the sexual harassment scenario may invoke a workplace and hence a worker rather than a stigmatised potential welfare recipient. It is also possible that the sexual harassment scenario, which describes a specific perpetrator, leads respondents to more easily agree to government action than situations of structural hardship where pinpointing the 'fault' for hunger or illness is difficult. These issues of negative versus positive rights, implicit deservingness of workers (compared to recipients of social assistance), and distinctions based on structural harms versus harm by a perpetrator should be studied further. What is clear, more than a year before the #MeToo movement put sexual assault and harassment front-and-centre in public debate, is that Californians react strongly to sexual harassment and make little distinction by legal status.

Our findings raise additional questions concerning generalizability. Our study design focused on women in need; our results might not hold for men. Anti-immigrant discourse can be gendered, with distinct negative connotations about female Latina migrants (linked to 'anchor baby' tropes) compared to male Latino migrants (more strongly associated with illegality and crime). Furthermore, to the extent that illegality is a racialized status for some in the United States (Wallace and Zepeda-Millán 2019), some

survey respondents might have conflated 'Mexican' with undocumented despite citizenship signals. This raises the possibility that we may be *understating* differential frame resonance by legal status, if Mexican-origin women born in the U.S. are not fully perceived as U.S. citizens. Future research should address how results might vary for other national origins. Likewise, we hope that future research extends beyond California, to other U.S. states and other countries. California is often perceived to be uniformly liberal, although the state is in fact home to substantial numbers of conservatives and moderates (Table 1). Do human rights appeals on behalf of immigrants and asylees work better elsewhere?

Overall, our analysis raises a fundamental question for scholars and activists. For decades, social movements have used rights language to make the United States a more inclusive, egalitarian, and generous society. Yet at the current moment, this 'master' frame appears ineffective. If this signals a larger exhaustion of the touchstone master frame that has inspired social movement activists since the 1960s, the implications for the immigrant 'rights' movement – and other movements for social justice – are profound. Indeed, to the extent that California may be more liberal than the rest of the United States, our findings about the limited resonance of rights appeals are particularly telling.

Equally profound is the implication that a discourse of American values might be an effective way to move Americans toward greater inclusion of undocumented residents. At least since the 1960s, U.S. progressives have shied away from a discourse of national values, often seeing negative connotations in such language. Can American values be effectively articulated as pro-immigrant? Admittedly, our research draws from one survey experiment; it requires confirmatory research. Yet other studies find that humanitarianism and egalitarianism are seen as core aspects of Americanism (Newman et al. 2013; Pantoja 2006); these pro-social values could structure public opinion about immigration in inclusive directions. Similarly, some scholarship on social movements underscores the efficacy of moral values and emotions in spurring activism on behalf of others (Jasper 1997; 2011). The best path forward for the pro-immigrant movement may be to elaborate the meaning of American values in such a way that it becomes the foundation of a new, immigrant-inclusive master frame.

Notes

1. SSI maintains a diverse panel of individuals recruited offline and online through social networks, website ads, and partnerships with loyalty programs. It takes several steps to verify respondents' identity and to recruit hard-to-reach populations, including ethno-racial minorities. Thus, while not a probability sample, our sample represents a diverse cross-section of registered California voters.
2. A concern with on-line administration of surveys is attentiveness, but recent work suggests that internet administration does not reduce attentiveness relative to traditional laboratory administration (Clifford and Jerit 2014). Attention-sensitive experiments have also been successfully replicated with online samples (see Paolacci and Chandler 2014).
3. The survey design purposefully over-sampled Asian/Pacific Islanders.
4. Following Weinberg, Freese, and McElhattan (2014, 308), we test whether these characteristics moderate the experimental effects. We find little evidence of moderation. The analysis suggests we might be understating the civil rights penalty with regards to government action, as the civil rights frame decreases whites' support for government action on behalf of undocumented immigrants more than Asian/Pacific Islanders' support ($p < .05$).

5. Vignettes portray only women to minimize differences across experimental conditions and because one scenario involves sexual harassment. While men can be victims of sexual harassment, Americans are less likely to view men as victims (Weinberg and Nielsen 2017).

6. Our survey was fielded a year before the #MeToo movement exposing sexual assault and harassment across U.S. employment sectors. We thought that respondents might be more likely to associate a sexual harassment scenario with a civil rights violation than food insecurity or health care. Under the Civil Rights Act of 1964, sexual harassment is a form of illegal workplace sex discrimination.

7. The prompts were: 'Nancy Miller is a white American woman born in California,' 'Keisha Thomas is an African-American woman born in California,' '{Maria Rodriguez/ Gabriela Martinez} is a Mexican American woman born in California,' or '{Maria Rodriguez/ Gabriela Martinez} is an undocumented immigrant from Mexico living in California.' The undocumented immigrant and Mexican American woman were randomly assigned to one of the two names (Maria or Gabriela). Respondents assigned to vignettes with both a Mexican-American woman and an undocumented immigrant did not see the same name twice.

8. The violation agreement question was not asked of respondents in the control condition, resulting in fewer observations.

9. In supplementary analysis, we confirmed that the civil rights penalty – with regards to violation agreement and government action – also occurs in vignettes featuring white American and African-American women. This suggests that the limits of civil rights framing are not a consequence of Mexican ethnicity.

10. We estimated regressions – separately for vignettes featuring undocumented immigrants and Mexican Americans – with indicators for the frames, types of difficulty, and interactions between frames and types of difficulty. Based on ordered logistic and linear regressions, we find little evidence of differential resonance for government action, but some evidence of differential resonance for violation agreement. For the latter, respondents penalize civil rights less in the sexual harassment scenario than in the food and health scenarios, especially in vignettes featuring Mexican-Americans. This suggests the civil rights frame is more resonant in the domain of sexual harassment than in the domain of social benefits.

11. We estimated regression models with indicators for legal status, the respondent characteristic, and the interaction of respondent characteristic and legal status, clustered by respondent.

12. We measured political ideology using a standard seven-point scale from (1) 'Extremely liberal' to (7) 'Extremely conservative.' We recoded this variable into 'Liberal' (1–3), 'Moderate' (4), and 'Conservative' (5–7).

13. See, for example, 'A German charity barred foreigners from receiving free food,' *Washington Post* 27 February 2018, https://www.washingtonpost.com/news/worldviews/wp/2018/02/27/a-german-charity-barred-foreigners-from-receiving-free-food-merkel-says-thats-wrong/?noredirect=on&utm_term=.a8e65f70402a.

14. Space limitations prevent a fuller discussion of the open-ended answers.

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Disclosure statement

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