# When War Is Work: The G.I. Bill, Citizenship, and the Civic Generation

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Suzanne Mettler, Soldiers to Citizens: The G.I. Bill and the Making of the Greatest Generation, (Oxford University Press 2005).

Since its enactment in June 1944,<sup>1</sup> the G.I. Bill has been elevated to almost mythical status in our collective memory. And in recent years, increased interest in the World War II generation has precipitated further discussion of the G.I. Bill, its beneficiaries, and its impact on postwar America and beyond.<sup>2</sup> Unfortunately, most of these accounts veer towards hagiography, reifying the Bill, without critically analyzing its impact and effects.<sup>3</sup> In one account, the G.I. Bill is characterized as the law that "made" modern America.<sup>4</sup>

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<sup>1.</sup> Servicemen's Readjustment Act of 1944, Pub. L. No. 346, 58 Stat. 284.

<sup>2.</sup> See, e.g., Stephen E. Ambrose, Citizen Soldiers: The U. S. Army from the Normandy Beaches to the Bulge to the Surrender of Germany (1997) (discussing World War II soldiers); Stephen E. Ambrose, The Good Fight: How World War II Was Won (2001) (discussing World War II); Tom Brokaw, The Greatest Generation (1998) (discussing the exceptionalism of the World War II generation); Tom Brokaw, The Greatest Generation Speaks: Letters and Reflections (1999) (featuring the letters and memories of the World War II generation).

<sup>3.</sup> There are, of course, exceptions to this trend. See, e.g., LIZABETH COHEN, A CONSUMERS' REPUBLIC: THE POLITICS OF MASS CONSUMPTION IN POSTWAR AMERICA (2003) (arguing that the G.I. Bill contributed both to the return to traditional gender norms and to the rise of a domestic-based consumer culture in the postwar period); IRA KATZNELSON, WHEN AFFIRMATIVE ACTION WAS WHITE (2005) (contending that the G.I. Bill exacerbated racial disadvantage); Margot Canaday, Building a Straight State: Sexuality and Social Citizenship under the 1944 G.I. Bill, 90 J. Am. Hist. 935 (2003) (documenting the exclusion of gays and lesbians from G.I. Bill benefits).

<sup>4.</sup> Michael J. Bennett, When Dreams Came True: The GI Bill and the Making of Modern America (1996).

In another, it is praised for expanding opportunities for social mobility and democratizing elite institutions.<sup>5</sup> Other accounts credit the Bill with fueling a robust postwar economy and pioneering suburbanization.<sup>6</sup>

Amidst these recollections, Suzanne Mettler's Soldiers to Citizens: The G.I. Bill and the Making of the Greatest Generation offers a unique perspective on the G.I. Bill narrative. Mettler, a political scientist, approaches the G.I. Bill from the vantage of one who is deeply interested in citizenship, civic participation, and the role of political institutions in fostering an active and engaged citizenry. Indeed, what makes Mettler's account of the G.I. Bill so fascinating is that she goes beyond the threshold question of most World War II tomes—"Who was the 'Greatest Generation' and what exactly made them great?"—and instead considers an ultimately more provocative question: whether, and how, the G.I. Bill shaped citizens<sup>7</sup> and the way in which they participated in civic life.

In Soldiers to Citizens, Mettler agrees that the G.I. Bill shaped modern America by democratizing opportunity and fueling economic growth (11); however, she also contends that the Bill did much more (9). She argues that through its generous educational and training provisions and its efficient administration, the G.I. Bill communicated to participating male veterans that they were "first class" citizens, worthy of the government's interest and investment (10). In so doing, the G.I. Bill fostered in these male beneficiaries positive feelings towards the program and the government that, in turn, spurred their active participation in civic and political groups (10). Although Mettler is decidedly less enthusiastic about the Bill's role in cultivating civic participation among the small cadre of female veterans (158), she nonetheless concludes that male veterans' heightened levels of civic participation continued throughout their lives, fostering a more vital democracy (2).

<sup>5.</sup> Edward Humes, Over Here: How the G.I. Bill Transformed the American Dream (2006).

<sup>6.</sup> MILTON GREENBERG, THE GI BILL: THE LAW THAT CHANGED AMERICA (1997).

<sup>7.</sup> It should be noted that throughout Soldiers to Citizens, Mettler does not restrict the terms "citizens" and "citizenship" to one's legal status within the United States. Instead, like other scholars, she embraces a more complex understanding of citizenship. See, e.g., David Abraham, Constitutional Patriotism, Citizenship, and Belonging, 6 Int'L J. Const. L. 137, 142-43 (2008) ("[C]itizenship is a constructed position defining status, one that interacts with and mitigates other positions, such as those involving class and power."); Jennifer Gordon & R. A. Lenhardt, Citizenship Talk: Bridging the Gap Between Immigration and Race Perspectives, 75 FORDHAM L. Rev. 2493, 2493 (2007) (acknowledging the "breadth of 'citizenship' as an analytical framework"); Leti Volpp, The Citizen and the Terrorist, 49 UCLA L. REv. 1575, 1592 (2002) ("We can understand citizenship as made up of four distinct discourses: citizenship as formal legal status, citizenship as rights, citizenship as political activity, and citizenship as identity/solidarity."); Angela P. Harris, Loving Before and After the Law, 76 FORDHAM L. REV. 2821, 2821 (2008) (noting the various dimensions of citizenship). Specifically, Mettler focuses on the "citizen" as a member of the polity and understands "citizenship" to be emblematic of one's civic and political participation in the polity. I have adopted her usage of these terms throughout this Book Review.

<sup>8.</sup> Mettler notes that World War II veterans "exhibited throughout their lives . . .

Viewing Soldiers to Citizens through a political science lens, other scholars have focused narrowly on Mettler's correlation between the beneficent treatment of veterans and their levels of civic engagement. Although this Book Review considers the relationship between civic engagement and veterans' benefits, it does so through a lawyerly lens and instead identifies gaps and oversights that temper the robustness of Mettler's claims. Additionally, this Book Review addresses Mettler's conclusion that public policy and government institutions can shape democratic participation today by considering how modern military service might affect the cultivation of citizens in contemporary society.

This Book Review proceeds in four parts. Part I provides a history of the G.I. Bill. Part II discusses Mettler's research methods, findings, and her overarching conclusion that the G.I. Bill's education and training provisions generated positive feelings about government that fostered male participating veterans' civic engagement for years to come.

Part III offers a critical assessment of *Soldiers to Citizens*, arguing that although the work is an important contribution to the field, there are a number of assumptions that remain unquestioned and under-theorized in Mettler's narrative. In particular, Mettler's account of the Bill's effects on marginalized groups, such as African American and women veterans is incomplete and would benefit from further elaboration. Part IV then concludes by considering Mettler's overarching question: how public policies and government institutions might foster democratic participation in contemporary America. This part reflects on changes in the composition of the military and the nature of military service, and considers how these developments might impact the cultivation of civic participation in contemporary society.

### I THE G.I. BILL IN HISTORICAL CONTEXT

During World War II, "the readjustment of 16 million veterans [w]as the major domestic problem" facing the country upon demobilization. <sup>10</sup> This concern with demobilization and the reintegration of veterans into civilian life was not merely the product of overanxious policymakers and pundits. Rather, the emphasis on postwar reintegration was prompted by a number of factors,

remarkable commitment to the principles and practices of democracy" (2).

<sup>9.</sup> Thomas A. Bruscino, Jr., No Soldier Left Behind, 7 CLAREMONT REV. BOOKS (2006) (book review) (arguing that Soldiers to Citizens is "Mettler's attempt . . . to marry the defense of big government with a call for a more active citizenship"); Neil A. Wynn, Book Review, 94 J. Am. Hist. 622 (2007) (recounting Mettler's claims regarding political engagement).

<sup>10.</sup> Susan M. Hartmann, Prescriptions for Penelope: Literature on Women's Obligations to Returning World War II Veterans, 5 Women's Stud. 223, 224 (1978) (emphasis added); see also ELIZABETH BORGWARDT, A NEW DEAL FOR THE WORLD: AMERICA'S VISION FOR HUMAN RIGHTS 14 (2005) (noting that President Franklin D. Roosevelt's Administration began planning for peace even as the war raged).

most of which related to employment and the economy. 11

First, recalling the 1932 Bonus March in which World War I veterans stormed the capital to lobby for unpaid military benefits, <sup>12</sup> many feared that discharged, unemployed veterans would be a powder keg of civil unrest and dissent. <sup>13</sup> Likewise, political leaders were mindful of recent events in post-World War I Europe where unemployed and disaffected veterans fueled the rise of Nazism and Fascism. <sup>14</sup> As President Franklin D. Roosevelt warned in his 1944 State of the Union address, "[p]eople who are hungry and out of a job are the stuff of which dictatorships are made." <sup>15</sup>

The nation's experience with the Great Depression also loomed large in demobilization efforts. Although the New Deal and its alphabet agencies had done much to stabilize the flagging economy prior to the war, most policymakers recognized that it was the war itself—and the tremendous industrial output required to sustain the war effort—that ultimately ended the economic upheaval and massive unemployment of the Great Depression. Many feared that demobilization would lead to a reversal of fortune; Industrial production inevitably would slow, and the number of returning veterans would outpace available jobs. Accordingly, the prospect of veteran reintegration prompted the question of how to end the war while maintaining a viable peacetime economy.

<sup>11.</sup> See Keith W. Olson, The G.I. Bill, the Veterans, and the Colleges 3-4 (1974); Melissa E. Muttay, Whatever Happened to G.I. Jane?: Citizenship, Gender, and Social Policy in the Postwar Era, 9 Mich. J. Gender & L. 91, 103 (2002); Keith W. Olson, The G.I. Bill and Higher Education: Success and Surprise, 25 Am. Q. 596, 597 (1973).

<sup>12.</sup> PAUL DICKSON & THOMAS B. ALLEN, THE BONUS ARMY: AN AMERICAN EPIC 56-206 (2004); HUMES, supra note 5, at 14-18 (describing the events precipitating the Bonus March).

<sup>13.</sup> See Bennett, supra note 4, at 194-95 (noting that one of the country's most reputable authorities on veteran reintegration viewed veterans as "a threat to society"); Olson, supra note 11, at 598 (quoting National Commander Warren H. Atherton's warning that veterans "will be a potent force for good or evil in the years to come. They can make our country or break it. They can restore our democracy or scrap it.").

<sup>14.</sup> HUMES, supra note 5, at 12; Murray, supra note 11, at 103; Olson, supra note 11, at 599.

<sup>15. 90</sup> Cong. Rec. 57 (1944) (statement of President Franklin D. Roosevelt).

<sup>16.</sup> Humes, supra note 5, at 12; DAVID R.B. ROSS, PREPARING FOR ULYSSES: POLITICS AND VETERANS DURING WORLD WAR II 34 (1969); Murray, supra note 11, at 104.

<sup>17.</sup> EDWARD BERKOWITZ & KIM MCQUAID, CREATING THE WELFARE STATE: THE POLITICAL ECONOMY OF TWENTIETH-CENTURY REFORM 151 (rev. ed. 1992); DAVID M. KENNEDY, FREEDOM FROM FEAR: THE AMERICAN PEOPLE IN DEPRESSION AND WAR, 1929-1945 786 (1999); Murray, supra note 11, at 103; Olson, supra note 11, at 599.

<sup>18.</sup> JOHN MORTON BLUM, V WAS FOR VICTORY: POLITICS AND AMERICAN CULTURE DURING WORLD WAR II 9 (1976) (noting that young Americans were preoccupied with the prospect of postwar economic depression).

<sup>19.</sup> See Humes, supra note 5, at 12 ("Most Americans expected high unemployment, political upheaval, and, in all likelihood, renewed recession or depression once peace arrived and demobilization began.").

<sup>20.</sup> Demobilization concerns focused on more than the state of the economy and the employment of veterans. Indeed, a substantial body of literature emerged between 1944 and 1946 that emphasized the psychological and social adjustments that returning veterans would face.

Policymakers and leaders also recognized that successful demobilization and reintegration would require the development of an informed and capable citizenry to foster democratic ideals. As Roosevelt observed, demobilization required "replenish[ing] our supply of persons qualified to discharge the heavy responsibilities of the postwar world. We have taught our youth how to wage war; we must also teach them how to live useful and happy lives in freedom, justice, and decency."<sup>21</sup>

To this end, the demobilization strategy was a multifaceted legislative effort. The Selective Training and Service Act of 1940<sup>22</sup> established peacetime conscription and assured enlistees that their jobs would be held for them when they returned from military service.<sup>23</sup> Congress also enacted the Veterans' Preference Act of 1944, which granted veterans, their widows, and the wives of disabled veterans, preference in employment where federal funds were However, these measures addressed only one aspect of the utilized.<sup>24</sup> demobilization conundrum: unemployment. There remained the pressing problems of fostering economic growth, modulating entry into the workforce, and developing citizens.

These lingering questions would be addressed by the G.I. Bill, an unprecedented law that offered returning veterans a vast array of reintegration opportunities.<sup>25</sup> In keeping with concerns regarding the dangers of unemployment and the need to foster economic growth, the Bill focused heavily on developing veterans' employment opportunities in the short- and the long-term.26

First, to tide over unemployed veterans while they looked for employment commensurate with their skills and abilities, the Bill provided a weekly \$20

These difficulties, the literature warned, ultimately would affect the family, and in so doing, society at large. Accordingly, the literature described the various predicted adjustments and prescribed "appropriate behavior and attitudes for civilians." Hartmann, supra note 10, at 224.

Franklin D. Roosevelt, Message to Congress on the Education of War Veterans (October 27, 1943), in 12 Public Papers and Addresses of Franklin D. Roosevelt 451 (Russell & Russell 1969) (1950).

Pub. L. No. 783, 54 Stat. 885 (1940).

<sup>23.</sup> Id. at §§ 2, 3, 8.

Pub. L. No. 359, 58 Stat. 387 (1944).

Servicemen's Readjustment Act of 1944, Pub. L. No. 346, 58 Stat. 284.

Id. The economic empowerment of individual citizens was a key aspect of Roosevelt's "Second New Deal" or "Second Bill of Rights." Following the initial implementation of the New Deal's economic stabilization programs, the Roosevelt Administration then turned to the project of securing economic security for all Americans. See Borgwardt, supra note 10, at 135-36 (describing the Roosevelt Administration's focus on economic security and "freedom from want" as key underpinnings of postwar domestic and foreign policy); KENNEDY, supra note 17, at 784 (noting that this economic bill of rights "would guarantee every citizen a job, a living wage, decent housing, adequate medical care, education, and 'protection from the economic fears of old age, sickness, accident, and unemployment""). Ultimately, the vision of the Second New Deal was never fully realized. For more discussion of Roosevelt's "Second Bill of Rights," see Cass R. SUNSTEIN, THE SECOND BILL OF RIGHTS: FDR'S UNFINISHED REVOLUTION AND WHY WE NEED It More Than Ever (2004).

"readjustment allowance" for up to fifty-two weeks.<sup>27</sup> In addition to this financial support, the Bill established a job counseling and employment placement service for veterans in order to "provide for them the maximum of job opportunity in the field of gainful employment."<sup>28</sup>

While these provisions did much for veterans, Titles II and III of the G.I. Bill were truly transformative, providing veterans with access to education and home and business ownership, while simultaneously shaping the development of postwar society. Title III provided returning veterans access to loans with which to purchase homes, farms, and business property.<sup>29</sup> Under this provision, any veteran who had served for ninety days or more was eligible for a loan at up to 4% interest.<sup>30</sup> Importantly, all of the loans were guaranteed by the Veterans' Administration ("VA") for up to 50% of their value, a valuable assurance to commercial lenders who had witnessed the economic devastation of the Great Depression.<sup>31</sup>

As many scholars have documented, the G.I. Bill loan provisions changed the nature of home ownership in the United States.<sup>32</sup> Prior to World War II, home mortgages required a 50% down-payment with short repayment periods, making the prospect of home ownership impossible for all but the elite.<sup>33</sup> The G.I. Bill broadened home ownership by permitting eligible veterans to borrow money for the purchase of homes, farms, and equipment without the security of a down-payment.<sup>34</sup> Nearly five million veterans bought homes under the G.I. Bill, amounting to almost half of the new homes constructed in the United States in the decade following World War II.<sup>35</sup>

In addition to expanding the pool of home owners, the loan provisions broadened the American landscape and fueled the rise of a robust consumer culture.<sup>36</sup> With increased demand for new construction, builders established new suburban communities outside of the traditional cityscape.<sup>37</sup> Suburban home construction was accompanied by the purchase of new furniture,

<sup>27.</sup> Servicemen's Readjustment Act of 1944, Pub. L. No. 346, § 700(a), 58 Stat. 284. 295. The recipients of the G.I. Bill's unemployment provisions were famously known as the "Fifty-two/Twenty Club," a nod to the amount of the weekly benefit and the number of weeks of eligibility. See HUMES, supra note 5, at 30.

<sup>28. § 600(</sup>a), 58 Stat. at 293-94.

<sup>29. §§ 500-503, 58</sup> Stat. at 291-93.

<sup>30. § 500(</sup>a), 58 Stat. at 291. The average interest rate in 1940 was 5.55%. U.S. DEP'T OF COMMERCE, STATISTICAL ABSTRACT OF THE UNITED STATES, 1944-45, at 931 tbl. 1008 (1945).

<sup>31. § 500(</sup>a), 58 Stat. at 291.

<sup>32.</sup> See, e.g., Bennett, supra note 4, at 287; Humes, supra note 5, at 89-90.

<sup>33.</sup> Humes, supra note 5, at 91; Katznelson, supra note 3, at 115.

<sup>34. § 500(</sup>b), 58 Stat. at 291.

<sup>35.</sup> HUMES, supra note 5, at 99.

<sup>36.</sup> See generally Cohen, supra note 3 (describing the rise of a uniquely American consumer culture after World War II); Meg Jacobs, Pocketbook Politics: Economic Citizenship in Twentieth-Century America (2005) (same).

<sup>37.</sup> Robert A. Beauregard, When America Became Suburban 108 (2006); Bennett, supra note 4, at 24.

automobiles, appliances, and housewares, as well as investment in municipal infrastructure like roads, utilities, schools, and retail establishments.<sup>38</sup>

Like the loan program, the G.I. Bill's educational and training benefits also played a critical role in transforming the postwar society. Indeed, of all the Bill's benefits, the education and training provisions are most commonly referenced as the paradigmatic example of the Bill's influence.<sup>39</sup> Title II offered eligible veterans the opportunity to pursue "education or training" for up to four years.<sup>40</sup> By its terms, any veteran who had served at least ninety days of active duty and "whose education or training was impeded, delayed, interrupted, or interfered with" by entry into the armed forces was eligible to pursue college, graduate school, or vocational training.<sup>41</sup> Of the fifteen million eligible veterans, about half availed themselves of Title II's educational benefits.<sup>42</sup> Of these beneficiaries, roughly 2.2 million attended college or graduate school on the G.I. Bill.<sup>43</sup>

In total, the G.I. Bill's education and training provisions completely reoriented the tenor of higher education in the United States.<sup>44</sup> Prior to the war,

- 40. Servicemen's Readjustment Act of 1944, Pub. L. No. 346, 58 Stat. 284, 288.
- 41. § 400, 58 Stat. at 288, 290.

<sup>38.</sup> Beauregard, supra note 37, at 108-16 (describing the effects of suburbanization on other aspects of the postwar economy); Cohen, supra note 3, at 121-22 ("[N]ew house construction provided the bedrock of the postwar mass consumption economy, both through turning 'home' into an expensive commodity for purchase by many more consumers than ever before and by stimulating demand for related commodities."); Elaine Tyler May, Homeward Bound: American Families in the Cold War Era 165-66 (1988) ("In the five years after World War II, consumer spending increased 60 percent, but the amount spent on household furnishings and appliances rose 240 percent. . . . In the four years following the end of the war, Americans purchased 21.4 million cars, 20 million refrigerators, 5.5 million stoves, and 11.6 million televisions and moved into over 1 million new housing units each year."); Carol Sanger, Girls and the Getaway: Cars, Culture, and the Predicament of Gendered Space, 144 U. Pa. L. Rev. 705, 718-19 (1995) (describing the link between postwar suburban living and increased demand for cars).

<sup>39.</sup> See James Brady, In Appreciation, The GI Bill, PARADE, Aug. 4, 1996, at 4-5; Into the Future: Social Revolution, LIFE, June 5, 1995, at 60-61; Edwin Kiester, Jr., The G.I. Bill May Be the Best Deal Ever Made by Uncle Sam, 25 SMITHSONIAN 129 (1994). It is ironic that the mythology of the Bill is centered on its role in expanding opportunities for higher education. When the terms of the G.I. Bill were being debated, the drafters, and indeed the public at large, did not expect the veterans to use their benefits to pursue college and graduate-level degrees. Olson, supra note 11, at 601-02. For others, including many notable educators, the issue was not whether veterans would make use of the education and training provisions, but whether they were suitable for higher education. Id. at 602-04.

<sup>42.</sup> Bennett, supra note 4, at 201; Cohen, supra note 3, at 139-41; Suzanne Mettler, Bringing the State Back In to Civic Engagement: Policy Feedback Effects of the G.I. Bill for World War II Veterans, 96 Am. Pol. Sci. Rev. 351, 351 (2002).

<sup>43.</sup> COHEN, supra note 3, at 141.

<sup>44.</sup> See Bennett, supra note 4, at 201-02 ("[T]he colleges and the universities had been changed forever."); Clark Kerr, The Uses of the University 52 (5th ed. 2001) (noting the G.I. Bill's effect on academic life); Milton Greenberg, How the GI Bill Changed Higher Education, Chron. Higher Educ., June 18, 2004, at B9-B10 (discussing the G.I. Bill's impact on colleges and universities); Richard J. Maloy, A Law That Changed America; The GI Bill Was a Lucky Accident, Wash. Post, June 24, 1994, at A27 (crediting the G.I. Bill with transforming the

college, like home ownership, was the province of the elite.<sup>45</sup> By 1947, veterans constituted "half of enrolled college students, doubling the number of males registered in prewar times, and increasing overall enrollment by 75 percent" (67).

The educational benefits recast the universe of options available to those veterans who had never entertained the prospect of obtaining a college or graduate degree. Yet, even for those who planned to attend college, the Bill widened the pool of available choices by authorizing tuition expenses of up to \$500 a year, making even the most prestigious colleges and universities suddenly affordable. Indeed, many veterans adjusted their educational goals and aspirations accordingly. As *Time* magazine wryly observed, "why go to Podunk College, when the Government will send you to Yale?" And for those who would have foregone higher education because of family responsibilities, the Bill made college possible by offering modest allowances to defray family expenses. 48

In all, the G.I. Bill has been credited with transforming American society. Undoubtedly, the Bill was responsible for democratizing higher education and home ownership, and in so doing, transformed the nation from a steeply hierarchical society divided by wealth and class to one in which citizens aspired to and achieved middle class status. <sup>49</sup> However, the question remains: did the G.I. Bill affect American society in ways that go beyond the evolution of material culture? In answering this question, *Soldiers to Citizens* illuminates a new facet of the G.I. Bill's weighty legacy.

U.S. into a "knowledge society" where "college education became commonplace"); Donald W. Patterson, GI Bill Gave Many a New Start; Enacted 50 Years Ago, News & Rec., (Greensboro, N.C.) June 22, 1994, at A1 ("Experts say the GI Bill shifted America from an industrial society to a knowledge society and in the process created an economic and educational revolution . . . .").

<sup>45.</sup> Bennett, supra note 4, at 20; Daniel A. Clark, "The Two Joes Meet--Joe College, Joe Veteran": The G.I. Bill, College Education, and Postwar American Culture, 38 Hist. Educ. Q. 165, 169 (1998).

<sup>46.</sup> Bennett, supra note 4, at 243; see also Suzanne Mettler, Soldiers to Citizens: The G.I. Bill and the Making of the Greatest Generation 47-48 (2005) (noting that 59% of higher education users agreed or strongly agreed that while they could have obtained a college education without the G.I. Bill, they would have to have done so in a program "of lesser cost, quality, or reputation").

<sup>47.</sup> S.R.O., TIME, Mar. 18, 1946, at 75.

<sup>48.</sup> Under the terms of the Act, "[w]hile enrolled in and pursuing a course under this part, such person . . . shall be paid a subsistence allowance of \$50 per month, if without a dependent or dependents, or \$75 per month, if he has a dependent or dependents. . . ." Servicemen's Readjustment Act of 1944, Pub. L. No. 346, 58 Stat. 284, 289. This was later adjusted to \$75 for single veterans, \$105 for veterans with one dependent, and \$120 for those with two or more dependents. Bennett, supra note 4, at 243; Mettler, supra note 42, at 354.

<sup>49.</sup> HUMES, *supra* note 5, at 94 (describing the G.I. Bill's role in the "rapid postwar expansion of the middle class").

#### II Assessing Soldiers to Citizens

In Soldiers to Citizens, Mettler identifies the generation of Americans who came of age during the Great Depression and World War II as the "civic generation."50 Unlike their successor generations, this cohort exhibited high rates of civic involvement and political participation: they voted regularly, maintained memberships in civic organizations like the Elks and the Rotary, socialized in local bowling leagues, and served in political positions.<sup>51</sup> In framing her narrative, Mettler considers what caused the civic generation's astounding levels of civic and political involvement, and posits whether this phenomenon might be replicated in contemporary society. As one who has studied the impact of administrative and political institutions on citizenship and democratic participation, 52 Mettler dismisses the standard explanations for the civic generation's characteristic drive.<sup>53</sup> Their active citizenship, she argues, cannot be explained solely by their socioeconomic backgrounds and upbringings. Nor can the exigencies of war account completely for their impressive record of civic participation—after all, fewer than one out of sixteen servicemen actually entered combat, and a quarter of enlisted men never left the homefront during their military service (35).<sup>54</sup>

Instead, Mettler concludes that the civic generation's experience with government—particularly the G.I. Bill's education and training provisions—provides the most fulsome explanation for their high levels of civic engagement. In substantiating this claim, Mettler relies on her own qualitative research probing the civic generation's experiences using the G.I.

<sup>50.</sup> Mettler takes this phrase from Robert Putnam's Bowling Alone: The Collapse and Revival of American Community, which termed this group the "long civic generation." ROBERT D. PUTNAM, BOWLING ALONE: THE COLLAPSE AND REVIVAL OF AMERICAN COMMUNITY 255 (2000).

<sup>51.</sup> See id. at 255-56 (describing the disparity in civic engagement between the civic generation and subsequent "postcivic" generations).

<sup>52.</sup> See generally SUZANNE METTLER, DIVIDING CITIZENS: GENDER AND FEDERALISM IN NEW DEAL PUBLIC POLICY (1998) (analyzing the gender implications of New Deal federalism and the rise of the administrative state); Suzanne Mettler, The Stratification of Social Citizenship: Gender and Federalism in the Formation of Old Age Insurance and Aid to Dependent Children, 11 J. Pol'y Hist. 31 (1999) (analyzing the role of two New Deal programs in structuring a gendered understanding of citizenship); Suzanne Mettler & Joe Soss, The Consequences of Public Policy for Democratic Citizenship: Bridging Policy Studies and Mass Politics, 2 Persp. On Pol. 55 (2004) (exploring the role of public policies in structuring citizenship).

<sup>53.</sup> See METTLER, supra note 46, at 4-5.

<sup>54.</sup> But see Putnam, supra note 50, at 268-70 (attributing the civic generation's unusually high level of civic engagement to national unification against a shared adversary, which he claims resulted in "civic frenzy" that endured for years after World War II ended).

<sup>55. &</sup>quot;Rather than focusing exclusively on how members of the civic generation experienced war, we might turn our attention to their experiences of government" (5).

<sup>56.</sup> Using mailing lists and contacts from military units that had formed their own veteran groups, Mettler cobbled together a sample containing veterans from a wide range of personal backgrounds, military ranks, and wartime experiences (178). She then mailed the sample a

Bill's education and training provisions.

Using the data generated by her survey responses, Mettler draws several important insights regarding veterans' use of the G.I. Bill and the nature of their postwar civic and political participation. Mettler's overarching conclusion is, of course, that the G.I. Bill's education and training provisions played a crucial role in cultivating veterans' civic participation. This is not to say that she minimizes the impact of individual characteristics or the cognitive effects of advanced education on veterans' civic engagement. However, Mettler makes clear that, by producing what she terms "feedback effects" among participating veterans, the G.I. Bill itself played an important role in their lives, strongly influencing their high levels of civic activity in the postwar period and beyond.

Specifically, Mettler argues that the Bill produced socioeconomic and communicative feedback effects among the population of participating veterans. For many veterans, particularly those who would not have attended college or pursued vocational training absent the availability of G.I. Bill benefits, the Bill changed the economic direction and substance of their lives. Those veterans who took advantage of the education and training benefits achieved greater employment opportunities than their fathers; indeed, many of them rose to the ranks of the professional classes. And those who did not become "white collar professionals" nonetheless substantially improved their standards of living, contributing to the rise of a burgeoning middle class.

According to Mettler, the generosity of the program, and the resulting

twelve-page survey "covering a wide variety of topics, including experience in the military, education, socioeconomic well-being, participation in civic and political activities in various time periods, and G.I. Bill usage" (178). Of the 1,000 veterans surveyed, 716 completed and returned the surveys—a 74% response rate (178). Mettler also distributed the survey to separate samples of black veterans and women veterans (180-81). After twice surveying members of the all-black 92nd Infantry Division, Mettler yielded responses of 42 and 53 percent, respectively—a total of 104 respondents (180-81). Using a nationwide list generated by Women in Military Service for America, Mettler fielded the survey to roughly 278 female veterans and received 222 completed surveys—an 80 percent response rate (181). Mettler supplemented her survey data with a smaller number of "personal, semistructured interviews with veterans in all regions of the country" (178).

<sup>57.</sup> In Soldiers to Citizens, Mettler does not define "feedback effects" but suggests that the term refers to the way in which government programs and regulations "have critical effects—for good or for ill—on citizens' attitudes about government and their participation in the political system" (12). See also METTLER, supra note 46, at 12-14 (discussing the study of policy feedback effects within political science and policy studies); id. at 110 (summarizing the G.I. Bill's feedback effects). Elsewhere, Mettler provides a more robust description of policy feedback theory and analysis. See Mettler, supra note 42, at 352.

<sup>58.</sup> Although Mettler does not say so expressly, her discussion of the Bill's influence on the civic activity of participating veterans refers to male veterans. See METTLER, supra note 46, at 144-62 (acknowledging that the Bill did not produce the same civic inducements among female veterans).

<sup>59.</sup> See id. at 110.

<sup>60.</sup> See id. at 94-96.

See id. at 94-95.

social, economic, and occupational mobility, had strong feedback effects among participating veterans, who credited the program and the sponsoring government with changing the course of their lives. Moreover, most veterans believed that the program not only benefited *them*, but derivatively, benefited their families as well. As one survey respondent enthused fifty years later, "[the G.I. Bill] gave our family a 'boost' that has allowed us to help our children go to college more than I had expected . . . G.I. Bill benefits have been passed to a second generation!" (105).

By fueling veterans' socioeconomic mobility, Mettler argues that the educational and training benefits also communicated to beneficiaries that the "government was for and about people like them, and thus it incorporated them more fully as citizens" (106). A critical aspect of this communicative function was the way in which the program was administered. On the whole, veterans found it extremely easy to apply for and receive the Bill's education and training benefits. 62 As one survey respondent raved, "You just enrolled—I didn't have to do anything" (65). In short, once the veteran established his eligibility for benefits and earned admission to a college, university, subcollege, or vocational program, he simply sat back and watched the government spring into action.<sup>63</sup> Tuition benefits were paid directly to the university or vocational school to which the veteran had matriculated. <sup>64</sup> At no point was the veteran required to serve as an intermediary between the VA and the receiving university. Instead, the VA worked directly with the university, college, or training program to disburse the benefits. 65 And, if problems arose in the transfer of funds, the veteran could seek help from the local VA branch office.<sup>66</sup> When mistakes were made in the distribution of benefits—an inevitability for a program of its size and scope—they usually were resolved to the veteran's advantage (77). This beneficiary-focused ethos also extended to the payment of living allowances. Although school tuition and fees were paid

<sup>62.</sup> The efficient distribution of benefits under the education and training provisions was a marked contrast to other aspects of the Bill. For example, Professor Kathleen Frydl recounts the enormous difficulties that many veterans had in seeking medical care and hospitalization benefits under Title I of the Act. Kathleen Frydl, The GI Bill (December 2000) (unpublished Ph.D. dissertation, University of Chicago) (on file with author), at 202-03, 234-35.

<sup>63.</sup> See id.

<sup>64.</sup> Indeed, as one respondent raved over fifty years later, "We had to apply [for benefits]. [Our eligibility] was processed through some regional offices . . . and then we simply got a check. I got a check for \$75 and the school was paid directly" (65). However, the direct payment system did have costs. Frequently, payments inadvertently were made to "sham" institutions and programs, miring the VA in a series of financial scandals. Frydl, *supra* note 62, at 236-37. Curiously, few accounts of the G.I. Bill, including Mettler's, have discussed these financial scandals. *See id.* at 237.

<sup>65.</sup> See METTLER, supra note 46, at 65.

<sup>66.</sup> Indeed, the VA bureaucracy was expanded to accommodate the needs of the various G.I. Bill programs (62-63). This expansion included the creation of thirteen branch offices, seventy regional offices, subregional offices, and field offices (63). Additionally, VA staff grew from 72,607 to 226,131 between December 1945 and February 1947 (63).

directly to the university, college, or vocational training program, the government paid the ancillary living allowance directly to the veteran, enabling him to pay for living expenses promptly and easily.<sup>67</sup>

In addition to ease of access to benefits, Mettler further argues that the program also produced positive associations among veterans in part because it was clear to the individual beneficiary that the benefits flowed from the government itself.<sup>68</sup> In making this point, Mettler argues that although modern citizens benefit from a range of government-subsidized income transfers—tax breaks, government subsidization of private pensions, etc.—these programs do not instill a strong sense of attachment to government because it is not clear to beneficiaries that the government is the source of the largesse (167). By contrast, the positive associations generated by the Bill's generosity and transformative socioeconomic effects were enhanced by the fact that the program clearly communicated that these opportunities were available through considerable government investment and initiative.<sup>69</sup>

In sum, the Bill's educational and training benefits conveyed to veterans that the government could be a positive force in the lives of individual citizens. To Grateful for the incredible changes that the government had effected in their lives, and cognizant of their privileged place in the polity, World War II veterans became active citizens, giving back to their communities, and ultimately, creating a more vibrant democracy.

### III CRITIQUING SOLDIERS TO CITIZENS

While Soldiers to Citizens is a remarkable contribution to the study of the G.I. Bill, there are lingering questions and areas for exploration that Mettler leaves unaddressed or dismisses too quickly. Among these are the role of other G.I. Bill programs and external socio-legal developments on African American veterans' civic engagement, the Bill's effects on white ethnic veterans and non-black veterans of color, and the importance of gender, work, and dependency in structuring benefits. Confronting these questions complicates Mettler's narrative; however, doing so adds useful texture to our understanding of the

<sup>67.</sup> See id. at 65; Theda Skocpol, The G.I. Bill and U.S. Social Policy, Past and Future, 14 Soc. Phil. & Pol'y 95, 97 (1997).

<sup>68.</sup> See METTLER, supra note 46, at 117.

<sup>69.</sup> See id. (noting that in the case of the G.I. Bill, the government's role in providing benefits was "clear and unambiguous").

<sup>70.</sup> Of course, as Mettler notes, World War II veterans were unique in that they were the first generation to experience the large-scale involvement of the federal government in everyday life through the New Deal. See id. at 5-6. But see Michele Landis Dauber, The Sympathetic State, 23 L. & HIST. REV. 387, 387-442 (2005) (arguing that, even before the New Deal, the federal government, through disaster relief efforts, long had been a visible presence in the lives of individual citizens); Michele L. Landis, "Let Me Next Time Be 'Tried By Fire'": Disaster Relief and The Origins of the American Welfare State 1789-1874, 92 Nw. U. L. REV. 967, 967-1034 (1998) (analyzing the history of government relief efforts).

Bill and its effects.

#### A. Complicating the African American Veteran Experience

Part of Mettler's task in Soldiers to Citizens involves rebutting claims that the G.I. Bill benefited primarily white veterans. In responding to these criticisms, Mettler argues that the educational and training provisions' transformative effects were not limited to white veterans. African American veterans also were privy to the social and economic gains with which the Bill is associated (137). These experiences, Mettler contends, produced positive feedback effects that spurred African American veterans' robust participation in the Civil Rights Movement (137). Thus, far from impeding African American advancement, as detractors suggest, Mettler argues that the G.I. Bill fueled racial and social progress in the postwar period (137).

However, in attempting to rebut charges of racial exclusivity and demonstrate the Bill's accessibility to a broad cohort of veterans, Mettler overlooks other factors that may have played a role in channeling African American veterans towards civil rights causes. In particular, Mettler does not address the impact of other G.I. Bill programs—namely the loan and unemployment assistance programs—and external socio-legal developments in animating civil rights activity. As a result of these omissions, Mettler overstates the Bill's racial legacy and neglects an opportunity to craft a more complex picture of African American veterans' experiences with the Bill.

Although Mettler emphasizes the fairness and inclusivity with which African American veterans experienced the educational and training provisions programs, she pays little attention to the considerable obstacles that this cohort experienced in other G.I. Bill programs. As an initial matter, the loan and unemployment programs differed markedly from the educational and training provisions in ways that were keenly felt by African American veterans. Unlike the educational and training benefits, the loan and unemployment programs were subject to considerably more local oversight in their administration. While the education and training provisions limited veteran interaction with local affiliates to program registration and troubleshooting, the unemployment assistance programs and loan assistance programs purposefully solicited local

<sup>71.</sup> See, e.g., KATZNELSON, supra note 3, at 129-30 ("Even outside the South, black access to primarily white colleges and universities remained limited."); Hilary Herbold, Never a Level Playing Field: Blacks and the GI Bill, J. BLACK HIGHER EDUC., Winter 1994-1995, at 106 ("The bill broke down class lines in higher education, but inequities of race remained more difficult to dislodge."); How the GI Bill Widened the Racial Higher Education Gap, 41 J. BLACKS IN HIGHER EDUC. 36, 36-37 (2003) ("[T]he GI Bill actually had the effect of increasing educational inequality between blacks and whites."); David H. Onkst, "First a Negro . . . Incidentally a Veteran": Black World War Two Veterans and the G.I. Bill of Rights in the Deep South, 31 J. Soc. Hist. 517, 529-30 (1998) (noting that while veterans represented 48% of the nation's college enrollment, black veterans comprised just 4% of the total number of enrolled veterans).

<sup>72.</sup> KATZNELSON, *supra* note 3, at 125-29; Frydl, *supra* note 62, at 309-13.

involvement and input.<sup>73</sup> In fact, local control over these programs was included in the Bill as a sop to Southern legislators who feared that the Bill's provisions would re-tool the Southern economy and society by extending to African American and women veterans unprecedented opportunities for occupational mobility, home ownership, and entrepreneurship.<sup>74</sup> Accordingly, both the loan program and the unemployment assistance program operated at the local level and were prone to parochialism and racism in the distribution of benefits.<sup>75</sup>

For example, in order to establish eligibility for unemployment benefits, veterans had to prove that they had attempted to find work but were unable to secure employment commensurate with their skills and interests. Local VA administrators ultimately decided whether the veteran had satisfied this requirement, which, for many minority veterans, frequently resulted in the denial of benefits. One African American veteran recounted his experience: trained as a truck driver in the Army, upon demobilization he unsuccessfully sought work driving a rig. When he applied for unemployment assistance, the local VA office denied his claim, finding that he had been offered employment as a dishwasher in a foundry. Despite the facts that the dishwasher position paid too little to support his family, and he had never worked in a foundry, the local VA administrator found this position to be commensurate with the

<sup>73.</sup> As Warren Atherton, the Commander of the American Legion observed, "We have endeavored to assure a measure of states rights in the legislation wherein control of many of the features of the bill will still rest with individual states." KATZNELSON, *supra* note 3, at 124.

<sup>74.</sup> Nearly a decade earlier, similar concerns animated the drafting of the Social Security Act's provisions. See Linda Gordon, Pitied but Not Entitled: Single Mothers and the History of Welfare 1890-1935 5 (1994). "[I]n 1935, Social Security excluded the most needy groups from all its programs . . . . These exclusions were deliberate and mainly racially motivated, as Congress was then controlled by wealthy southern Democrats who were determined to block the possibility of a welfare system allowing blacks freedom to reject extremely low-wage and exploitive [sic] jobs as agricultural laborers and domestic servants." Id. The Social Security Act programs were not the only aspects of the New Deal that exhibited signs of racial discrimination. Risa Lauren Goluboff, "Let Economic Equality Take Care of Itself": The NAACP, Labor Litigation, and the Making of Civil Rights in the 1940s, 52 UCLA L. Rev. 1393, 1410 (2005) ("Many [of the New Deal] programs purposefully excluded African Americans, and many more did so in implementation if not in design.").

<sup>75.</sup> See KATZNELSON, supra note 3, at 128 (characterizing the G.I. Bill as "affirmative action for whites" and observing that for blacks, veteran status "was placed at the discretion of parochial intolerance"); Goluboff, supra note 74, at 1434 (noting "discriminatory and segregationist practices of the United States Employment Service"); Onkst, supra note 71, at 519-20 (1998) (reporting that black veterans in Georgia, Alabama, and Mississippi rarely were able to secure VA-guaranteed loans). Mettler herself acknowledges the degree to which the loan program's promise was elusive for black veterans, although this account does not necessarily temper her understanding of the Bill's education and training provisions as a major factor in cultivating black veterans' civic engagement (102).

<sup>76.</sup> Onkst, *supra* note 71, at 521.

<sup>77.</sup> KATZNELSON, supra note 3, at 139.

<sup>78.</sup> Id

<sup>79.</sup> Id.

veteran's skills and interests and, thus, rejected his unemployment assistance claim. 80

The confluence of systemic racism and local prejudices also disadvantaged African American veterans in the loan program. Although the VA guaranteed veteran loans under the G.I. Bill, the federal government did not fund the loans directly. Veterans had to secure financing from local financial institutions. In keeping with parochial conventions in the South and other parts of the country, many financial institutions refused to approve loans to African American veterans without a substantial down-payment or other evidence of available assets. As one African American veteran observed bitterly, "[For] Negro veterans in Mississippi, getting a G.I. loan is similar to seeking the 'Holy Grail'" (102).

The challenges that African American veterans experienced in accessing G.I. Bill benefits in the education, loan, and unemployment programs provides a useful counterpoint to Mettler's conclusions regarding African American G.I. Bill beneficiaries. Mettler argues that, while the G.I. Bill's educational and training provisions produced similar positive feedback effects in African American and white veterans, African American veterans channeled their civic impulses into the nascent Civil Rights Movement, rather than in traditional civic groups. Mettler accounts for the difference by pointing to the way in which African American veterans experienced the Bill's educational and training provisions. Administered fairly and inclusively, the educational and training provisions demonstrated to African Americans that government could treat all Americans equally, dispelling the inevitability of the racial status quo (141). Mettler thus maintains that, because of this uniquely positive experience with the Bill's education and training provisions, African American G.I. Bill participants were inspired to agitate for racial progress elsewhere in society (137).

While this is one explanation for the robust participation of African American G.I. Bill beneficiaries in the Civil Rights Movement, less positive

<sup>80.</sup> Id.

<sup>81.</sup> *Id.*; Ross, supra note 16, at 115-24; Onkst, supra note 71, at 522.

<sup>82.</sup> Herbold, supra note 71, at 106; Onkst, supra note 71, at 522.

<sup>83.</sup> KATZNELSON, supra note 3, at 134-40; Florence Wagman Roisman, National Ingratitude: The Egregious Deficiencies of the United States' Housing Programs for Veterans and the "Public Scandal" of Veterans' Homelessness, 38 IND. L. Rev. 103, 148 (2005). Discrimination in the housing market was not limited to difficulties in securing financing. African Americans often experienced abject discrimination that precluded them from settling in particular communities. Bruce Lambert, At 50, Levittown Contends with Its Legacy of Bias, N.Y. TIMES, Dec. 28, 1997, § 1, at 23 (discussing Levittown's discrimination against black veterans). Although Mettler acknowledges the racism that characterized the loan guarantee programs, she does not consider how these obstacles in other aspects of the G.I. Bill may have affected black veterans' civic participation. See METTLER, supra note 46, at 102 ("The treatment of African American veterans under the loan guarantee provisions stood in contrast to what they encountered under most aspects of the education and training provisions.").

encounters with the G.I. Bill also might explain their proclivity towards civil rights causes. Just as white veterans perceived the government's investment in them as a reflection of their worth as citizens, the difficulties African American veterans experienced in accessing unemployment assistance and government-guaranteed loans may have underscored for them their subordinate position within the hierarchy of citizens. Thus, rather than producing the *positive* feedback effects experienced by white G.I. Bill beneficiaries, these indignities may have resulted in more ambivalent feedback effects for African American beneficiaries. Having risked their lives in a segregated military only to find their entitlement to military benefits limited by all too familiar institutional constraints, African American veterans may have channeled their frustrations into the Civil Rights Movement and other causes dedicated to improving the position of racial minorities.

Further, in explaining African American veterans' civic involvement, Mettler does not consider fully the impact of socio-legal events exogenous to the G.I. Bill. For example, although the period immediately following the war did not see the robust developments in civil rights that characterized the 1960s, it was nonetheless a period of tremendous change and racial tension. Following the war, the South experienced a wave of racial violence, some of it directed towards returning black veterans. In 1948, President Truman initiated the integration of the armed forces, perhaps inspiring former veterans to seek institutional changes in the civilian sphere. Further, the late 1940s and

<sup>84.</sup> Mettler acknowledges as much in the book. See METTLER, supra note 46, at 102. ("Those who experienced such discrimination received clear messages that despite their military service on behalf of the nation, they were unworthy of the treatment afforded to white citizens."). However, this does not modulate her conclusion that the Bill's education and training provisions produced positive associations that fueled civic engagement. Interestingly, others have taken issue with her account of the Bill's inclusiveness—even in the distribution of education and training benefits. According to historian Ira Katznelson, African American veterans routinely experienced difficulties seeking access to both higher education and sub-college training. KATZNELSON, supra note 3, at 129-37.

<sup>85.</sup> Perhaps part of Mettler's reluctance to credit the influence of socio-historical developments is the fact that she does not identify precisely the parameters of the "postwar period" that witnessed the emergence of heightened civic and political engagement. Here, I assume that her understanding of the postwar period extends from 1945 to the Civil Rights Movement.

<sup>86.</sup> MARY L. DUDZIAK, COLD WAR CIVIL RIGHTS: RACE AND THE IMAGE OF AMERICAN DEMOCRACY 18-24 (2000); Herbold, *supra* note 71, at 105 (noting that in 1946 and 1947, the lynchings of two black veterans were "economic reprisals" for using military benefits).

<sup>87.</sup> Exec. Order No. 9981, 3 C.F.R. 722 (1943-1948); see also KATZNELSON, supra note 3, at 81-82 (describing Truman's integration order). Integration, however, was not immediate. It would not be until 1956 when the armed forces were completely integrated. KATZNELSON, supra note 3, at 82. Nevertheless, the Executive Order was an important symbolic victory for those engaged in the struggle for racial justice. See Mario L. Barnes, "But Some of [Them] Are Brave": Identity Performance, the Military, and the Dangers of an Integration Success Story, 14 DUKE J. GENDER L. & POL'Y 693, 694 (2007) (noting that military integration "became a harbinger for increased civil rights for people of color, inside and outside the military").

early 1950s saw huge legal strides in expanding access to education, as the NAACP's Legal Department ("Legal Department") incrementally chipped away at "separate but equal" educational policies. In addition to its success in education, the Legal Department also challenged successfully both the state action doctrine, thereby making nominally private actors subject to discrimination suits under the Fourteenth Amendment, and racial discrimination in organized labor. All of these developments—individually or collectively—were enormous advances in the fight for civil rights and all may have been factors that, along with the G.I. Bill, induced black veterans to mobilize within the ranks of the Civil Rights Movement.

To be sure, Mettler provides a compelling argument that the G.I. Bill was a critical factor in fueling the Civil Rights Movement. However, the G.I. Bill may have been one of a number of socio-legal developments that contributed to veteran involvement in civil rights issues. And, as the discussion of the loan and unemployment provisions makes clear, the Bill's impact on African American civic engagement may be more complicated than Mettler's narrative suggests. Although consideration of these factors would have complicated Mettler's conclusions regarding the Bill's inclusivity, doing so would have provided useful nuance to her discussion of the Bill's role in shaping postwar racial justice efforts.

Brown v. Bd. of Educ., 347 U.S. 483, 495 (1954) ("We conclude that in the field of public education the doctrine of 'separate but equal' has no place."); Bolling v. Sharpe, 347 U.S. 497 (1954) (holding that "separate but equal" educational policies violated the Equal Protection Clause of the Fifth Amendment); McLaurin v. Okla. State Regents for Higher Educ., 339 U.S. 637 (1950) (holding that a state university's decision to provide different treatment to a student solely because of his race deprived the student of his Fourteenth Amendment due process rights); Sweatt v. Painter, 339 U.S. 629 (1950) (concluding that denial of admission to the University of Texas Law School was unconstitutional because the "separate" institution reserved for black students was not "equal" in terms of facilities and amenities); Sipuel v. Bd. of Regents of Univ. of Okla., 332 U.S. 631 (1948) (requiring the admission of qualified black students to previously all-white state law schools where the state failed to provide a "separate but equal" educational experience for black students). Mettler mentions these cases in her account of the African American postwar experience as evidence of the degree to which racial barriers were being dismantled in the postwar period (72-74). I want to suggest that, independently, these developments may have been part of a vast range of legal and political developments that fueled African American veterans' participation in the Civil Rights Movement.

<sup>89.</sup> See Marsh v. Alabama, 326 U.S. 501 (1946) (finding a privately-owned company town to be a state actor); Screws v. United States, 325 U.S. 91 (1945) (holding that the actions of state officials were taken under the color of state law, even though they violated state law); Smith v. Allwright, 321 U.S. 649, 664-65 (1944) (striking down the white primary, even where the primary process had been privatized, on the ground that the party's discriminatory actions were "the action of the [S]tate"); Goluboff, supra note 74, at 1443-44 (describing the Legal Department's efforts to expose private actors to liability under the Fourteenth Amendment).

<sup>90.</sup> See Goluboff, supra note 74, at 1436-42.

### B. The G.I. Bill's Effects on White Ethnic Veterans and Non-Black Veterans of Color

Mettler's attempt to counter claims that the G.I. Bill benefited primarily white male veterans also falls short because she does not account for the Bill's effects on white ethnic and non-black minority veterans. In Soldiers to Citizens, the reader is presented with only three types of veterans: whites, blacks, and women. By limiting her analysis to these three groups, Mettler ignores the G.I. Bill's impact on the lives of other marginalized groups, thereby responding only in part to the critics' claims of disproportionate benefit to white, male veterans. For example, although Japanese Americans famously enlisted in the 100th Infantry Battalion and 442nd Regimental Combat Team, which were among the most highly decorated units in U.S. military history, Mettler makes no mention of their service or their wartime or postwar experiences.

In addition to the experience of Japanese Americans, Mettler does not discuss other Asians who fought with the United States in the Pacific theatre. Indeed, over 200,000 Filipino nationals served alongside the U.S. military during World War II as members of the Philippine Commonwealth Army or as authorized anti-Japanese guerrilla units. In 1945, they were promised eligibility for U.S. veteran benefits. In 1946, however, Congress enacted the Rescission Act, providing that service in the Philippine Commonwealth Army or authorized guerrilla units would not be considered active military service for the purposes of veterans' benefits. Further consideration of these alienated perspectives could have provided a more informed account of the ways in which different ethnic subgroups experienced the Bill in the wake of their military service and the effects of these experiences on their civic participation.

<sup>91.</sup> Mettler does mention briefly some ethnic groups. See METTLER, supra note 46, at 29 ("Combined, Native Americans, Puerto Ricans, Hawaiians, and those of Mexican, Chinese, Filipino, and Japanese descent constituted 1.6 percent of the ranks."); id. at 129 (discussing briefly the exclusion of minorities from veterans' groups and the consequent formation of Latino civil rights groups). However, there is no sustained analysis of these groups in her account of the G.I. Bill

<sup>92.</sup> See generally LYN CROST, HONOR BY FIRE: JAPANESE AMERICANS AT WAR IN EUROPE AND THE PACIFIC (1994) (describing the military service of Japanese Americans).

<sup>93.</sup> A. Wallace Tashima, *Patriotism: Do We Know It When We See It?*, 101 Mich. L. Rev. 2007, 2007-09 (2003) (book review).

<sup>94.</sup> The Filipino Veterans Movement, http://www.pbs.org/wgbh/amex/macarthur/sfeature/bataan\_filipino.html. (last visited Oct. 1, 2007).

<sup>95.</sup> Id.

<sup>96.</sup> Rescission Act of 1946, Pub. L. No. 70-301, 60 Stat. 14.

<sup>97.</sup> *Id.* (providing that service in the Philippine Army "shall not be deemed to be or to have been service in the military or naval forces of the United States . . . for the purposes of any law of the United States conferring rights, privileges, or benefits upon any person by reason of . . . service . . . in the military or naval forces of the United States"); see also Truman Urges Aid for Filipino Ex-GI's, N.Y. TIMES, July 2, 1947, at 8.

The experience of Latino veterans also would have been illuminating, as it provides an important counterpoint to the experience of African American veterans, which Mettler discusses at length. Routinely subjected to racial and ethnic discrimination prior to the war, many Latinos served in the military during World War II and were eligible for the full panoply of veterans' benefits. However, like African Americans, Latinos experienced difficulty accessing these benefits, particularly in the Southwest and the West. 100

And like the black veterans who populate Mettler's narrative, Latino veterans responded to the postwar social and political stratification by agitating for Latino civil rights. In 1948, after learning that a naval hospital in Corpus Christi, Texas had refused to accept Latino World War II veterans suffering from tuberculosis, Hector P. Garcia founded the American G.I. Forum, an interest group for Latino veterans. <sup>101</sup> The American G.I. Forum served as an important advocacy tool for Latino veterans, many of whom explicitly were

This is not to say that Latinos experienced discrimination in a manner identical to African Americans. As other scholars have noted, Latinos suffered serious discrimination before, during, and after World War II, but the discrimination was different from that experienced by blacks and thus engendered different litigation responses. Throughout the Southwest and West, Latinos were not regarded as "colored," as African Americans were, but as "other whites." Accordingly, they did not experience discrimination in the same manner as African Americans. See generally Ariela J. Gross, "The Caucasian Cloak": Mexican Americans and the Politics of Whiteness in the Twentieth-Century Southwest, 95 GEo. L.J. 337 (2007) (describing the legal treatment of Mexican Americans); Ian F. Haney López, Race, Ethnicity, Erasure: The Salience of Race to LatCrit Theory, 85 CALIF, L. REV. 1143, 1165 (1997) (discussing efforts to characterize Latinos as culturally distinct from, yet racially similar to whites, for purposes of civic participation); Clare Sheridan, "Another White Race:" Mexican Americans and the Paradox of Whiteness in Jury Selection", 21 L. & HIST. REV. 109 (2003) (discussing the distinctions drawn between African Americans and Latinos in jury selection procedures); Steven H. Wilson, Brown over "Other White": Mexican Americans' Legal Arguments and Litigation Strategy in School Desegregation Lawsuits, 21 L. & HIST. REV. 145 (2003) (arguing that because Mexican Americans were classified as "other whites," rather than as "colored," their litigation strategies departed from those espoused by African American interest groups like the NAACP Legal Defense and Education Fund).

<sup>99.</sup> HENRY A.J. RAMOS, THE AMERICAN GI FORUM: IN PURSUIT OF THE DREAM, 1948-1983 2, 84-85 (1998); MAGGIE RIVAS-RODRIGUEZ, A LEGACY GREATER THAN WORDS: STORIES OF U.S. LATINOS & LATINAS OF THE WORLD WAR II GENERATION XI (2006); see also Ariela J. Gross, Texas Mexicans and the Politics of Whiteness, 21 L. & HIST. REV. 195, 197 (2003) (noting incidents of discrimination against Latinos).

<sup>100.</sup> RAMOS, supra note 99, at 3.

<sup>101.</sup> IGNACIO M. GARCIA, HECTOR P. GARCIA: IN RELENTLESS PURSUIT OF JUSTICE 81-89 (2002); RAMOS, *supra* note 99, at 3-5. Exclusion from veteran medical facilities was only one aspect of the discrimination faced by Latino veterans. In 1945, Private Felix Longoria was killed while on duty in a volunteer mission in the Pacific. Almost four years later, his remains were returned to his home in Three Rivers, Texas for burial; however, the town's only funeral parlor denied Longoria chapel services on the ground that its Anglo clientele would be outraged. With the intervention of then-senator Lyndon B. Johnson and the G.I. Forum, Longoria became the first Mexican American serviceman to be buried at Arlington National Cemetery. *See* GARCIA, *supra* note 101, at 104-39; IAN F. HANEY-LÓPEZ, RACISM ON TRIAL: THE CHICANO FIGHT FOR JUSTICE 76 (2003); RAMOS, *supra* note 99, at 9-17.

excluded from membership in traditional veterans groups (129). The group later evolved into a fulcrum of the Latino civil rights movement. 103

Certainly, as a scholar and researcher, Mettler could have decided to focus her account on the largest demographic groups. However, one might expect that the experience of Japanese American and other veterans of Asian descent, many of whom witnessed internment or otherwise suffered abject discrimination during and after the war, would have offered a unique perspective on the Bill's ability to cultivate active citizenship. And certainly, the experience of Latino veterans might have served as a corollary to Mettler's account of the African American veteran experience. Attention to these other minority groups would have provided a more complete empirical account for Mettler's analysis and would have elaborated her claims regarding the Bill's fairness and inclusivity.

Also of concern is Mettler's tendency to broadly group white veterans into a single demographic. While this may be useful for data collection purposes, it produces ambiguities in distilling the G.I. Bill's role in fostering civic engagement. For example, Mettler notes that unlike black veterans, who tended to be involved in the Civil Rights Movement, white veterans participated in more traditional social and civic groups like the Elks and the Rotary (124-37). While this was certainly true for many white veterans, it was not always the case for those who were religious minorities. <sup>108</sup> Jews and

<sup>102.</sup> Still, it is worth noting that Mettler devotes considerable resources to studying the Bill's treatment of women veterans, who comprised only 2% of the World War II military.

<sup>103.</sup> David L. Leal, It's Not Just a Job: Military Service and Latino Political Participation, 21 Pol. Behav. 153, 154 (1999).

<sup>104.</sup> See METTLER, supra note 46, at 29. It should be noted, however, that Mettler devotes considerable energy to discussing the Bill's effects on women veterans, who comprised one of the smallest demographic groups in the World War II military.

<sup>105.</sup> Exec. Order No. 9066, 3 C.F.R. 1092 (1938-1943) (precipitating the evacuation of Japanese aliens and Japanese Americans from "military areas"); GREG ROBINSON, BY ORDER OF THE PRESIDENT: FDR AND THE INTERNMENT OF JAPANESE AMERICANS 125-76 (2001); Eric L. Muller, Constitutional Conscience, 83 B.U. L. Rev. 1017, 1021-25 (2003).

<sup>106.</sup> As Professor Eric Muller has written, the experience of discrimination during the war made many Nisei resist efforts to conscript them into the armed forces. Eric L. Muller, A Penny for Their Thoughts: Draft Resistance at the Poston Relocation Center, 68 L. & CONTEMP. PROBS. 119, 136 (2005) (replicating a list of discrimination grievances posted by Nisei in response to being drafted). Japanese American veterans also experienced discrimination in the postwar period. Henry A. Singer, The Veteran and Race Relations, 21 J. Educ. Soc. 397, 397, 401 (recounting that Nisei veterans "had been beaten and thrown out of an American Legion Clubroom" and that recuperating Nisei veterans "were forced to forgo outdoor exercise and air because they dare[d] not venture beyond the [army] hospital" grounds).

<sup>107.</sup> There are occasions, however, where Mettler distinguishes religious minorities, like Catholics and Jews, from the broader population of white veterans (53).

<sup>108.</sup> As an initial matter, religious minorities often had their own interest groups. See John C. Scott, Jr., Membership and Participation in Voluntary Associations, 22 Am. Soc. Rev. 315 (1957); Charles R. Wright & Herbert H. Hyman, Voluntary Association Memberships of American Adults: Evidence from National Survey Sample Surveys, 23 Am. Soc. Rev. 284 (1958); see also Jewish War Veterans of the U.S.A., JWV Timeline-1896 to the Present: Over a Century of

Catholics, in particular, routinely were subjected to discrimination in housing, 109 college admissions, 110 and membership in social and civic groups. 111

By portraying the postwar civic milieu in such binary terms, Mettler runs the risk of essentializing the experiences of different ethnic, religious, and racial subgroups. Hore importantly, in overlooking the experiences of these other underrepresented minorities, she misses an important opportunity to further consider the role of government and government programs in cultivating civic and political engagement following World War II.

#### C. Gender, Work, Dependency, and the G.I. Bill

In the penultimate chapter of *Soldiers to Citizens*, Mettler shifts her focus to women veterans. There, she acknowledges that the G.I. Bill's role in cultivating the civic generation did not extend to women veterans, and indeed, may have impeded civic participation for civilian and veteran women alike (158). While her analysis of the effect of the G.I. Bill on women is facially correct, it is nonetheless, an incomplete account.

Unlike their male counterparts, for whom the G.I. Bill endowed social and occupational mobility and substantial government investment in their future potential and success, "[women veterans] did not experience the life-altering effects or perceive the affirming messages of inclusion that so enhanced the participation rates of male beneficiaries" (151). Mettler acknowledges that this

Patriotic Service,

http://www.jwv.org/images/uploads/Jewish%20War%20Veterans%20Timeline.pdf (last visited Mar. 19, 2007) (describing the efforts of the JWV from its founding in 1896 to the present); Catholic War Veterans of the U.S.A., Objectives and History of Catholic War Veterans of the U.S.A., http://www.cwv.org/history/history.htm (last visited Mar. 19, 2007) (describing the efforts of the CWV since its founding in 1935). In addition to veterans' interest groups, religious minorities often maintained other interest groups that focused more generally on issues of concern to their respective communities. See Henry Epstein, The Programs of Jewish Civil Rights Organizations, 20 J. NEGRO EDUC. 367, 367 (1951) (listing, inter alia, B'nai B'rith, the American Jewish Congress, and the American Jewish Committee).

- 109. CHARLES ABRAM, FORBIDDEN NEIGHBORS: A STUDY OF PREJUDICE IN HOUSING 234-35, 265 (Kennikat Press 1971) (1955) (describing discrimination in housing against Jews and Catholics); BENJAMIN R. EPSTEIN & ARNOLD FORSTER, "SOME OF MY BEST FRIENDS. . ." 79-142 (Greenwood Press 1975) (1962) (reporting discrimination against Jews in housing); EUNICE GRIER & GEORGE GRIER, DISCRIMINATION IN HOUSING: A HANDBOOK OF FACT 8-10, 20-25 (1960) (describing discrimination in housing against Jews directly and Catholics indirectly on the basis of Italian or Irish ancestry).
- 110. ANDREW M. GREELEY, AN UGLY LITTLE SECRET: ANTI-CATHOLICISM IN NORTH AMERICA 63-85 (1928) (describing discrimination against Catholics in higher education); Marcia Graham Synnott, Anti-Semitism and American Universities: Did Quotas Follow the Jews?, in ANTI-SEMITISM IN AMERICA HISTORY 233-71 (David A. Gerber ed., 1986) (detailing discrimination against Jews in higher education during period from 1870-1970).
  - 111. Epstein & Forster, supra note 109, at 109.
- 112. For a discussion of the importance of transcending the black-white binary in scholarship, see Ariela Gross, Beyond Black and White: Cultural Approaches to Race and Slavery, 101 COLUM. L. REV. 640 (2001).

disparity resulted, in part, from the prevailing view of men's and women's social roles. In particular, she notes that the predominant understanding of men as wage-earning workers and women as their dependents colored the administration of G.I. Bill benefits in ways that disadvantaged women veterans. For example, although male veterans were advised of their eligibility for education and training benefits in the course of discharge, women veterans were not (149). Similarly, while men routinely received vocational counseling when they separated from the military, women survey respondents reported that they rarely received the same information (149). As Mettler notes, these practices went beyond simply overlooking the postwar aspirations of women veterans; they reflected entrenched gender roles that constructed men as wage-earning workers and women as their home-bound dependents. Because women veterans were not expected to seek employment upon reentry to civilian life, the Bill's provisions and administration were not structured with them in mind. 113

Because Mettler clearly comprehends the gendered nature of work and dependency and its impact on the administration of military procedures, it is puzzling that she does not mention that this gender dynamic also was reflected in the New Deal, and as such, is an important—and overlooked—link between these two transformative programs. Specifically, Mettler's analysis overlooks the possibility that the G.I. Bill reflected and was influenced by the cultural entrenchment of the work-dependency dichotomy that emerged from the New Deal era. As scholars have acknowledged, much of the New Deal's programs and legislation were based on the gendered understanding of men as workers and women as their dependents. Work-relief programs sponsored by the Civilian Conservation Corps (CCC) and the Works Progress Administration (WPA) created jobs for unemployed men. Women were not

<sup>113.</sup> This social reality also squared with the empirical reality of the armed forces. During World War II, women comprised only 2% of the military. Janann Sherman, "They Either Need These Women or They Do Not": Margaret Chase Smith and the Fight for Regular Status for Women in the Military, 54 J. MIL. HIST. 47, 76 (1990). Because men were the overwhelming majority of the veteran population, it is perhaps unsurprising that the G.I. Bill was understood as "a policy for the men." (144).

<sup>114.</sup> Indeed, I take issue with Mettler's conclusion that the G.I. Bill was distinct from the New Deal relief programs because it departed from the New Deal's emphasis on broadening opportunities for all citizens, and instead moved towards privileging a specific class of citizens: veterans. See METTLER, supra note 46, at 16.

<sup>115.</sup> Regina Werum, Matching Youth and Jobs? Gender Dynamics in New Deal Job Training Programs, 81 Soc. Forces 473, 482 (2002) (noting that in Congressional debates of New Deal legislation, "the discussion revolved around reducing men's unemployment" leaving "women's [job] training . . . an afterthought" and "reaffirm[ing] home economics as the appropriate venue for women"); Jeff Manza, Political Sociological Models of the U.S. New Deal, 26 Ann. Rev. Soc. 297, 304 (2000) ("New Deal reformers assumed that men were, and should be, the primary breadwinners for their families, and thus social insurance programs were to be targeted first at men (thereby protecting married women and children as well).").

<sup>116.</sup> See Werum, supra note 115, at 476 ("[T]hroughout the 1930s, women largely remained excluded from alternative work relief programs aimed at men and run by the NYA,

expected to participate in these work-relief efforts, as it was assumed that they would be supported through their husbands' participation. 117

The emphasis on men's work and women's dependence was even more pronounced in the Social Security Act of 1935 and its 1939 amendments, which entrenched the work-dependency dichotomy in the allocation of benefits. Programs such as Old Age Insurance (OAI) (what is now known as Social Security) were "pay in" programs in which benefits were predicated on contributions made during the working life of the beneficiary. 118 As such, benefits accrued to those who were long-term wage earners and breadwinners-typically men-and were understood as entitlements based on the beneficiary's long-term participation in the workforce. 119 The OAI's male orientation was articulated further by its exclusion of "teachers, nurses, hospital employees, librarians, and social workers"—all occupations heavily dominated by women. 120 And although the 1939 amendments to the Act expanded the range of OAI insurance to include women, they too reiterated the paradigms of male work and female dependency. Under the amendments, eligibility for benefits was limited to the widows and surviving children of deceased wageearners, making clear that women would be incorporated into the Act derivatively as the dependents of entitled (deceased) wage-earners.<sup>121</sup>

Not surprisingly, eligibility for the only New Deal program specifically geared towards women, Aid to Dependent Children (ADC), was predicated entirely on the beneficiary's need and dependence. Rooted in the Progressive Era's mothers' pensions, ADC was aimed at mothers who had been widowed or abandoned and therefore lacked the financial security of a wage-

CCC, and WPA."); Susan Ware, Women and the New Deal, in FIFTY YEARS LATER: THE NEW DEAL EVALUATED 113, 124 (Harvard Sitkoff ed., 1985) (noting that the WPA permitted participation by only one household member, virtually ensuring male participation, and that the CCC accepted only male enrollees).

<sup>117.</sup> Manza, *supra* note 115, at 304 (noting that New Deal relief was aimed at men, with the assumption being that women and children would be supported by male breadwinners). Indeed, First Lady Eleanor Roosevelt called attention to the fact that, despite the accepted New Deal narrative of *male* unemployment, "more than two million women were out of work as well." Ware, *supra* note 116, at 123.

<sup>118.</sup> Kathleen Keller, Federalizing Social Welfare in a World of Gender Difference: A History of Women's Work in New Deal Policy, 8 S. Cal. Rev. L. & Women's Stud. 145, 161 (1999) ("[T]he Old Age Insurance program was, from the very beginning, designed to create a federal entitlement to security.").

<sup>119.</sup> JILL QUADAGNO, THE COLOR OF WELFARE: HOW RACISM UNDERMINED THE WAR ON POVERTY 19, 157 (1994); Manza, *supra* note 115, at 304.

<sup>120.</sup> Id. at 157.

<sup>121.</sup> Alice Kessler Harris, Designing Women and Old Fools: The Construction of the Social Security Amendments of 1939, in U.S. HISTORY AS WOMEN'S HISTORY: NEW FEMINIST ESSAYS 87, 91-92 (Linda K. Kerber, Alice Kessler-Harris & Kathryn Kish Sklar eds., 1995).

<sup>122.</sup> Nancy K. Cauthen & Edwin Amenta, Not for Widows Only: Institutional Politics and the Formative Years of Aid to Dependent Children, 61 Am. Soc. Rev. 427, 428 (1996) (describing ADC as a "means-tested" program).

earning husband. 123 Through ADC benefits, the state offered a substitute for an absent husband's wages, enabling the beneficiary to remain in the home to care for her children, and more importantly, to refrain from market work. 124 Accordingly, in ADC, as with the 1939 Social Security amendments, women's participation was understood in derivative terms. They were eligible for benefits as dependents of wage-earners, but not as wage-earners in their own right. 125

Although it was enacted a decade after the Social Security Act and other New Deal relief programs, the G.I. Bill was consistent with the New Deal's gendered understanding of work and dependence. Animated by the need to secure the postwar economy, the Bill focused on stabilizing the labor force, which was expected to be inundated by returning male veterans. To this end, the Bill specifically sought to enhance the veterans' potential for sustained wage-earning, while stabilizing the economy and the supply of available employment. Accordingly, the Bill offered employment counseling, unemployment assistance, educational and training benefits that enabled occupational mobility in the long-term, and guaranteed loans that allowed veterans to not only purchase homes, but also to become self-employed entrepreneurs.

This view of the G.I. Bill—as legislation aimed at enhancing veterans' capacity to be long-term wage-earners—links the Bill with the New Deal and its emphasis on employment and the economy. Moreover, it also explains why,

<sup>123.</sup> Cauthen & Amenta, supra note 122, at 427; Murray, supra note 11, at 98.

<sup>124.</sup> Gordon, *supra* note 74, at 37; Cauthen & Amenta, *supra* note 122, at 430-31. Although ADC's primary purpose was to subsidize the family lives of those women who lacked a male breadwinner, it also reinforced the idea that women's roles were oriented around home and family, rather than the workplace. In this way, the program may be seen as actively discouraging women from entering the paid workforce.

<sup>125.</sup> LINDA K. KERBER, NO CONSTITUTIONAL RIGHT TO BE LADIES: WOMEN AND THE OBLIGATIONS OF CITIZENSHIP 74 (1998) ("[Social Security] penalized women who 'earned their own way' and 'rewarded women who remained in stable marriages and were supported by their husbands."").

<sup>126.</sup> As I discussed earlier, the prospect of demobilization triggered widespread anxiety regarding the fragility of the economy and labor market. See supra pp. 104-108; Robert K. Lamb, Mobilization of Human Resources, 48 Am. J. Soc. 323, 329 (1942) (observing that demobilization presented the "prospect of mass unemployment on a scale hitherto unimagined"); Richard A. Lester, Effects of the War on Wages and Hours, 33 Am. Econ. Rev. 218, 229 (1943) (anticipating a "large volume of 'reconversion unemployment" following demobilization).

<sup>127.</sup> Olson, *supra* note 11, at 600 ("Anxiety about economics... preceded and dominated [the G.I. Bill's] altruism toward veterans."). When signing the G.I. Bill into law on June 22, 1944, President Roosevelt acknowledged the Bill's economic character, observing that military personnel "have been compelled to make greater economic sacrifice... than the rest of us, and are entitled to definite action to help take care of their special problems." Franklin D. Roosevelt, The President Signs the G.I. Bill of Rights (June 22, 1944), *in* 13 Public Papers and Addresses of Franklin D. Roosevelt 180-81 (Russell & Russell 1969) (1950).

<sup>128.</sup> The Bill's education and training provisions also served another purpose, beyond enhancing veterans' wage-earning capacities. By diverting returning veterans to the classroom, rather than the workforce, these provisions also helped modulate the demand for available jobs.

though facially gender-neutral, the G.I. Bill was understood to be "for the men" (150). Although its terms applied to women veterans, this silent minority would never be determinative in the distribution of G.I. Bill benefits or the public's perception of the Bill. Instead, the Bill was concerned with facilitating wage-earning, and in so doing, reinforced the gendered dichotomy of work and dependence.

The force of the work-dependency dichotomy was not limited to the structure of G.I. Bill benefits; it also shaped the social understanding of military service during World War II. The departure of young men from the labor force to the military, and their replacement by women, long has been part of the World War II legacy. <sup>129</sup> Inspiring enduring images of "Rosie the Riveter," women left their traditional domestic roles to shoulder jobs that once were reserved exclusively for men. <sup>130</sup> But instead of ushering in a new understanding of work as a vehicle for women's citizenship as well as men's, this change merely preserved the citizenship status quo that framed men as workers and women as their dependent helpmeets. <sup>131</sup>

Indeed, the rhetoric surrounding women's wartime work expressly communicated that their efforts would not be understood as on par with the market work performed by men in times of peace. Women's participation in the workforce was presented as merely a temporary measure animated by the exigencies of war, not as a long-term change in the nature of employment and the understanding of gender roles. Further, in urging women to assist the war effort by performing market work, the Manpower Commission and other

<sup>129.</sup> MAUREEN HONEY, CREATING ROSIE THE RIVETER: CLASS, GENDER, AND PROPAGANDA DURING WORLD WAR II 21 (1984) ("The primary advantage of the war to women workers was that it drained the labor force of male labor at a time when high industrial production was imperative.").

<sup>130.</sup> The agency chiefly responsible for channeling women into the workforce was the War Manpower Commission, which relied on government advertising campaigns, in tandem with popular culture appeals. *Id.* at 28-59 (describing the Commission's efforts to attract women to the workforce).

<sup>131.</sup> *Id.* at 1 (questioning "why the media's legitimation of female entry into male work failed to supplant the traditional image of women as homemakers, unsuited by nature for wielding power outside of the domestic province").

<sup>132.</sup> *Id.* at 28 ("the short-term orientation of war agencies to secure victory operated against viewing war workers as anything but emergency stand-ins"); Murray, *supra* note 11, at 104 ("[W]omen's forays into [the workforce] were temporary measures acceptable only at a time of profound national crisis.").

<sup>133.</sup> Ruth Milkman, Gender at Work: The Sexual Division of Labor During World War II, in Women's America: Refocusing the Past 446, 449 (Linda K. Kerber & Jane Sherron De Hart eds. 6th ed.) (2004). This social message was underscored legislatively as the Selective Training and Service Act ensured that demobilized veterans were entitled to return to the jobs that they had held prior to enlisting, forcing women to withdraw from their wartime occupations. Pub. L. No. 783, 54 Stat. 885 (1940); see also Murray, supra note 11, at 104 ("By privileging the male worker as a long-term economic participant and devaluing women workers as temporary laborers who could be slotted in and out of the workforce, the Selective Training and Service Act amplified traditional views of men as the nation's workforce.").

government agencies emphasized that this foray into the workplace was simply an extension of women's domestic role as helpmeets to men. <sup>134</sup> By contributing to the domestic war effort, women were not "working" in their own right, but rather, were helping their spouses, who were "working" in military service. <sup>135</sup> Indeed, the term "homefront" made this distinction clear. During the war, the workplace helmed by women was not the same as a peacetime workplace populated by men. <sup>136</sup> Instead, the workplace and its activities were understood as an extension of the home itself. <sup>137</sup>

The understanding of men's military service also changed to reflect this shift in the composition of the labor force. When the war began and the bulk of male workers left the workplace to fight, military service eclipsed traditional market work as a marker of male citizenship. As the "homefront" rhetoric clearly signaled, women's labor in the traditional workplace was distinct from—and subordinate to—men's military service.

In addition to dismissing the importance of the work-dependence dichotomy in structuring G.I. Bill benefits, Mettler overlooks the possibility that this same dynamic also caused some women to experience the G.I. Bill more positively. At the outset, Mettler concludes that the Bill did not produce the same positive feedback effects among women veterans as it did among the cohort of male veterans. Moreover, she argues that in providing such broad advantages to veterans, most of whom were men, the Bill also disadvantaged civilian women and impeded their civic participation in the postwar period.

While it is clear that the Bill primarily advantaged male veterans, Mettler may sweep too broadly in concluding that women were wholly disadvantaged by, and thus did not have positive experiences with, the Bill. Indeed, the understanding of women as the dependents of working men redounded to the benefit of a certain class of civilian women: veterans' wives. As dependents of eligible veterans, these women no doubt saw a dramatic change in their material circumstances following their husbands' participation in the Bill's

<sup>134.</sup> Susan M. Hartmann, The Home Front and Beyond: American Women in the 1940s, at 23 ("In the public image, women took war jobs to bring their men home more quickly and to help make the world a more secure place for their children . . . "); Maureen Honey, The Womanpower Campaign: Advertising and Recruiting Propaganda during World War II, in 6 Frontiers 50, 52 (1981) ("By working for country, sweetheart, husband, or brother, women who stepped into men's shoes [during war] were doing so as helpmates . . . "). Of course, women's forays into the workforce also were animated by practical concerns. Hartmann, supra, at 79 (noting that wives worked to make up the income loss suffered as their husbands went to war).

<sup>135.</sup> Murray, *supra* note 11, at 109-10.

<sup>136.</sup> Id. at 110-11.

<sup>137.</sup> Underscoring this distinction, the nature of women's wartime industrial work was framed in relation to traditional domestic tasks. Women's magazines and job manuals emphasized the similarities between housework and war work—operating a drill press was akin to juicing oranges; cutting plane parts was no different from cutting a dress from a pattern. Milkman, *supra* note 133, at 449; Murray, *supra* note 11, at 110.

<sup>138.</sup> Murray, *supra* note 11, at 111.

<sup>139.</sup> Id.

education and training programs.<sup>140</sup> Buoyed by their husbands' rising fortunes, they too may have experienced warm feelings about the G.I. Bill and the government that made these socioeconomic changes possible.<sup>141</sup> Accordingly, while the Bill may not have produced the same range of positive feedback effects in women as it did for men, greater attention to the work-dependence dichotomy makes clear that it may be too reductive to conclude that the Bill's impact on women was entirely negative.

In overlooking the understanding of work, dependency, and gender that undergirded both the New Deal relief efforts and the G.I. Bill and its benefits, Mettler misses a critical opportunity to explore the ways in which the Bill not only influenced civic participation, but actively reinforced a gendered understanding of citizenship. As many scholars have documented, the links between work and dependence in the construction of citizenship have been in place since the eighteenth century. Similarly, military service long has been—and continues to be—a conduit for citizenship. Consideration of the confluence of these elements in the creation and deployment of the G.I. Bill would have created a more robust understanding of the G.I. Bill and its role in structuring citizenship for veterans and civilians alike.

In sum, Soldiers to Citizens is a remarkable achievement and an important addition to the extant literature on the G.I. Bill. My critique of Mettler's account of the experiences of African Americans, women, and other marginalized groups is intended to temper—but not diminish—the force of her claims. More importantly, in calling attention to these underexplored questions, I wish to point the way for future scholarship and debate in this important, but neglected, area.

Moving forward, I leave aside Mettler's specific claims regarding various veterans groups and instead turn to her overarching claim—that contemporary policymakers might use the G.I. Bill as a template for structuring modern-day programs and institutions in ways that foster civic participation and democratic engagement.

<sup>140.</sup> This accords with other accounts of the postwar period. See HARTMANN, supra note 134, at 15 ("as family members and consumers, women did benefit from the relative economic prosperity which followed the war"); COHEN, supra note 3, at 113-24 (describing the vast increase in household prosperity that attended the postwar period).

<sup>141.</sup> Mettler dismisses this possibility, noting that "[w]ives of G.I. Bill beneficiaries are unlikely to have accrued much in the way of enhanced civic capacity and inclination from the program, given that they lacked the firsthand experience of the program that was so crucial to its interpretive effects" (158).

<sup>142.</sup> Nancy Fraser & Linda Gordon, A Genealogy of Dependency: Tracing a Keyword of the U.S. Welfare State, 19 SIGNS 309, 312-19 (1994).

<sup>143.</sup> Kerber, supra note 125, at 236-60 (discussing military service as a vehicle for citizenship); Kenneth L. Karst, The Pursuit of Manhood and the Desegregation of the Armed Forces, 38 UCLA L. Rev. 499, 499 (1991) ("In the United States, as in Europe, citizenship and eligibility for military service have gone hand in hand.").

## CONCLUSION WAR, WORK, AND CULTIVATING CITIZENS TODAY

An unstated theme in Mettler's account of the G.I. Bill—and indeed, in other discussions of the civic generation's remarkable record of civic engagement—is the unique role of war in binding the nation together and creating opportunities for civic reinvigoration in the postwar period. This unstated—but obvious—implication raises questions regarding the feasibility of replicating the G.I. Bill's effects in our own society. If war creates unique opportunities for fostering civic reengagement, can our current military conflict result in an outpouring of sustained civic engagement, as World War II did?

If we credit Mettler's account of the G.I. Bill's influence on civic participation (and, generally, I do), part of the answer to this question lies in the postwar treatment of veterans and the benefits allotted for military service. However, I further contend that our contemporary understanding of war and military service also plays a role in our ability to cultivate sustained civic engagement among veterans, and the broader population, in the postwar period. In focusing on the cultivation of citizenship in the post-World War II period, Mettler pinpoints an era in which the relationship between the citizen-soldier and the state was at its apex and military service was constitutive of citizenship and its privileges. Indeed, one could argue that it is only because veterans and military service were understood in such lofty terms that the extraordinary postwar benefits—and their extraordinary role in fostering civic participation were possible. Today, the military and our understanding of military service differ markedly from their World War II iterations. These changes deeply affect the social meaning communicated by veterans' benefits, and as a consequence, may limit the opportunities for cultivating democratic engagement in the postwar period.

As I argued earlier, work long has been a crucial element of citizenship, and in World War II, military service was the preeminent form of citizenship-conferring work, particularly when juxtaposed with the novelty of female employment in the domestic labor market. War, in short, was a highly valued form of work. That is, military service, which, by virtue of

<sup>144.</sup> See, e.g., PUTNAM, supra note 50, at 275 (speculating that the disparity in the levels of civic participation among the civic generation and subsequent generations can be attributed to "the great midcentury global cataclysm"—World War II); see also Preston Quesenberry, Bowling Together During War, 111 Yale L.J. 1031, 1032 (2002) (book note) (discussing Putnam's suggestion that World War II was a critical factor in cultivating the civic generation).

<sup>145.</sup> Since the terrorist attacks of September 11, 2001, the United States has been engaged in a "war on terror" that has resulted in the occupation and invasion of two foreign nations.

<sup>146.</sup> See supra pp. 145-48.

<sup>147.</sup> For a discussion of this, see *supra* pp. 148 (noting that, during World War II, military service replaced traditional market employment as a marker of male citizenship); *see also* Murray, *supra* note 11, at 110 ("If the 'home front' included the entire domestic wartime economy and its

conscription, was a civic obligation of all able-bodied male citizens, replaced traditional marketplace labor as the primary means by which men attained and enjoyed the fruits of full citizenship.

Today, war and military service are still understood as work, but the stakes and context have changed. With the integration of women and minorities into the military, military service can no longer be juxtaposed against a feminized domestic "homefront" or segregated military units in reflecting an elevated ideal of white, male citizenship. <sup>148</sup> More importantly, as many critics have observed, the elimination of the draft has meant that the call to arms is no longer exclusively about civic obligation or duty. 149 More often it is a life choice animated by the prospect of educational opportunities, health benefits, and career advancement in one of the country's most meritocratic institutions. 150 Military service, for many, is simply another career path—one that typically is unimpeded by the institutional obstacles that often attend traditional labor market employment. 151 Alternatively, military service may provide crucial training and experiences that later will distinguish the veteran in the competitive civilian labor market.<sup>152</sup> Thus, for those who have been marginalized in society (i.e., minorities, women, and the economically disadvantaged), military service provides both access to a career ladder in

- 149. Charles B. Rangel, Op-Ed., *Bring Back the Draft*, N.Y. TIMES, Dec. 31, 2002, at A19 (noting that since the end of conscription "[s]ervice in our nation's armed forces is no longer a common experience").
- 150. David M. Halbfinger & Steven A. Holmes, *Military Mirrors a Working Class America*, N.Y. Times, Mar. 30, 2003, at A1 (quoting Rep. Charles Rangel as saying that "the people that we ask to fight our wars are people who join the military because of economic conditions, because they have few options"); Steven A. Holmes, *For Job and Country: Is This Really an All-Volunteer Army?*, N.Y. Times, Apr. 6, 2003 at WK1 (reporting that many critics argue that, in the absence of conscription, "relative economic disadvantage" is the driving force in military enlistment).
- 151. David R. Segal & Mady Wechsler Segal, *America's Military Population*, POPULATION BULL. Dec. 2004, at 30 ("Many black women see the military as providing greater opportunities and benefits than the civilian labor market.").
- 152. *Id.* at 16 box 4 ("[M]otivations for serving [in the armed forces] . . . include the desire to learn a skill applicable in the civilian labor force, or to earn educational benefits that will enable them to go to college.").

female workers, then only those activities beyond the expanded "home front" could truly be "work" in the status-conferring, citizenship sense.").

<sup>148.</sup> CHARLES C. MOSKOS & JOHN SIBLEY BUTLER, ALL THAT WE CAN BE: BLACK LEADERSHIP AND RACIAL INTEGRATION THE ARMY WAY 47 (1996) (observing that notwithstanding the low percentage of women and minorities in the officer corps, "[i]f officers are the executives of the armed forces, the armed forces boast more black [and female] executives than any other institution in the country"); Note, Lessons in Transcendence: Forced Associations and the Military, 117 Harv. L. Rev. 1981, 1981 (2004) ("[T]he military is . . . the most successfully racially integrated institution in American society . . . ."); Orlando Patterson, Op-Ed., Affirmative Action: The Sequel, N.Y. Times, June 22, 2003, § 4, at 11 (noting that the U.S. military is "the most ethnically varied at all levels of its organization of all the world's great forces"). Admittedly, the integration of women into the armed forces has been "a somewhat slower process" than the integration of racial and ethnic minorities. Lessons in Transcendence, supra, at 1990-92 (discussing women's progress in the armed forces).

which merit is rewarded and health and educational benefits are assured, and the opportunity to acquire skills that may facilitate upward mobility in the civilian sphere. 153

For those who are less encumbered by the personal and institutional obstacles of poverty, racism, and sexism, military service may be less attractive. As a consequence of this dynamic, the nation's current fighting force is renowned for its racial diversity service as a career, or as a crucial component of their long-term career trajectory. However, this diversity and professionalism comes with costs. Although the military embodies racial, ethnic, and gender diversity, the burden of military service frequently is borne by those who lack the economic and social capital to negotiate alternative paths. 157

These differences have important implications for Mettler's hopes for a modern-day revival of civic engagement and participation. As an initial matter, if military service is seen as simply a career option for society's most marginalized members, it is likely to be devalued and stigmatized, limiting its potential to confer the benefits and privileges of full citizenship. Further, if military service is seen as a job, rather than as a patriotic sacrifice, the prospect of rewarding veterans for their wartime service seems impossibly remote. Indeed, the current state of veterans' educational benefits echoes both of these concerns and suggests the degree to which we already have shifted from the understanding of military service as a sacrifice worthy of generous largesse to a model in which military service is a job with commensurate employment

<sup>153.</sup> See Holmes, supra note 150 (noting that the high rates of enlistment of women and minorities signal the "equal opportunity the armed services provide," but "it could also be viewed as indicating the lack of opportunity—real or perceived—for [minorities] in civilian society"); Segal & Segal, supra note 151, at 9 box 2 (noting that whites, those who are college-bound, and those whose parents are college-educated are less likely to serve in the military).

<sup>154.</sup> Halbfinger & Holmes, *supra* note 150 (observing that "the nation's wealthy and more well-educated youth have shunned the military"); Holmes, *supra* note 150 (noting that although the present military is primarily composed of those from the working and middle classes, "fewer rich people" are serving in the enlisted ranks than historically was the case); Segal & Segal, *supra* note 151, at 24-25 (debunking the "long-standing myth" that conscription functioned as a "social leveler, distributing the burden of military service equitably across all sectors of society," and noting that, historically, conscription "placed the burden of defending the nation on the less wealthy and less powerful, although not necessarily on the lowest income groups").

<sup>155.</sup> Steven A. Holmes, An Integrated Army Doesn't Think Alike, N.Y. TIMES, Nov. 28, 1999, § 4, at 3 ("There is little question that the military . . . is far and away the most racially integrated institution in American society."); Rangel, supra note 149 ("A disproportionate number of the poor and members of minority groups make up the enlisted ranks of the military...."); Segal & Segal, supra note 151, at 20 ("In 2002, blacks made up about 22 percent of enlisted personnel in the armed forces ... while blacks made up 13 percent of civilians ages 18 to 44.").

<sup>156.</sup> Segal & Segal, *supra* note 151, at 16\_box 4 (identifying educational benefits and opportunities to obtain skills as key factors animating enlistment in the contemporary armed forces).

<sup>157.</sup> See Holmes, supra note 150 (reporting that many critics have argued that "relative economic disadvantage has replaced local draft boards in determining who enters the military, especially the enlisted ranks").

benefits.

Under the modern iteration of the G.I. Bill—the Montgomery G.I. Bill 158—all active duty military personnel are eligible for educational and training benefits, regardless of whether they serve during a time of war or in peacetime. 159 Benefits, thus, are not predicated on the extraordinary sacrifices that war compels. Additionally, to be eligible for educational benefits, the Montgomery G.I. Bill requires active duty members to contribute to their education by accepting a pay reduction of \$100 per month for twelve months. 160 Once these salary deductions have been made, enlistees are then eligible for educational benefits in the amount of a monthly stipend—on average, \$800 per month—for a maximum of thirty-six months. 161 unlike the World War II G.I. Bill, which was an unprecedented "no-strings attached" government investment in the individual veteran, the Montgomery G.I. Bill conditions the conferral of benefits on the enlistee's own contributions—similar to Social Security benefits or other employment benefits, like health insurance. In this way, the benefits that presently attend military service are distinct from the World War II G.I. Bill's extraordinary opportunities, which were understood to be a generous entitlement from the government to individual veterans. Today, the benefits offered under the Montgomery G.I. Bill appear more like standard employment benefits, and, like tax benefits or government-subsidized pension benefits, are not necessarily understood as government-funded largesse.

In arguing that our understanding of military benefits has responded to external factors in the civilian labor market, I do not mean to suggest that these are the only factors in play. Obviously, there may be many other reasons that explain these shifts. Nor can I gauge empirically the degree to which we have abandoned entirely (if we have) our understanding of military service as an extraordinary sacrifice worthy of extraordinary reward. Nevertheless, it seems clear, that there has been a change in the way we understand the military. It is imperative that we understand this change—and its repercussions—if we are to realize the postwar period's opportunities for civic reinvigoration.

<sup>158. 38</sup> U.S.C. § 101 (2000).

<sup>159.</sup> Since the beginning of the second Iraq war, there have been renewed calls for an updated G.I. Bill. See Jim Webb & Chuck Hegel, Op-Ed, A Post-Iraq G.I. Bill, N.Y. Times, Nov. 9, 2007, at A27. As this Book Review went to press, President Bush, after considerable public debate, signed a military appropriations bill that would, inter alia, augment the scope of existing G.I. Bill benefits. Although these new enhancements are generous, they do not match the breadth of the original G.I. Bill. For example, while the original G.I. Bill provided funding sufficient to allow veterans to attend private universities, the new enhancements provide funding sufficient to pay in-state tuition at a public college or university. See Tamar Lewin, Ohio Gives Veterans In-State Rates at Public Colleges, N.Y. Times, July 9, 2008.

<sup>160. 38</sup> U.S.C. § 3011(b)(1) (2000).

<sup>161.</sup> See Jim Webb & Chuck Hagel, Op-Ed. supra note 159; U.S. Dep't of Veterans Affairs, Chapter 30 Rates – October 1, 2007, http://www.gibill.va.gov/GI Bill Info/rates/CH30/ch30rates100107.htm.

In making this claim, I do not want to dismiss Mettler's clarion call to reconsider the role that government and government institutions play in creating an environment in which civic engagement may flourish. But it is important to understand that institutions do not function in a vacuum. In order to understand the G.I. Bill's complicated legacy and replicate its citizenship effects today, we must be attentive to a broad range of factors, including the changing nature of the military, its personnel, and the relationship between the citizen-soldier and the state. Mettler has taken the first step, looking back to a more optimistic moment to consider what may be possible ahead. Going forward, it is our charge to examine these institutions holistically in order to understand how they implicate our ability to foster an engaged and enlivened polity.