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Liberty or Equality? A Comparative Approach to Welfare in the United States and France

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Introduction

The creation of a welfare state in France and the United States of America is rooted in this question: what is the State's responsibility to its people? Since the first World War, French and American culture have defined welfare in different ways. The US has referred to it as Social Security whereas the French term *État-providence* emblemizes a “salvation state” or “heaven(ly) state.” Generally speaking, the word “welfare” dates back to the Old English word, *wel faran*, meaning the “condition of being or doing well.” In 1904 and 1918, respectively, the definition of Welfare on both continents broadened to mean “social concern for the well-being of children, the unemployed, etc.” and “organized effort to provide for maintenance of members of a group.” The term “welfare state” was first used in 1941, a phrase that encompasses all three definitions and allows a State to become involved in more personal matters. My interest in this project came through researching the welfare states in France and the US during the time frame of the late 19th century to the 21st century. For the purposes of this project I will compare and contrast how gender, culture, and security intersect with the changing ideologies of the welfare states in the US and France.

As I was researching and preparing this project, I found that it was impossible for me to linearly explain and lay out the various ways in which France and the United States' Welfare Systems are similar and different. So, I created this visual display to show how I have connected each of my topics together. My connections do not have to be the same ones that you find or make. Welcome to my mind and enjoy.

Historical Context

France

In order to understand the influence of the Welfare State in France, it is important to examine its origins and how all its parts are related over time. To begin, the Welfare State in France dates back to the Franco-Prussian War in 1870, after which France's devastating loss spurred a pronatalist movement in France that focused on women producing more soldiers for France. In addition, the devastation World War I caused in France exacerbated the need to "repopulate" the country. Furthermore, the two World Wars inspired pronatalist policies in France, such as cash allowances to families when they had many children. This law remains in effect and is still part of France's welfare system.¹

Another aspect of the Welfare State relates back to the period of industrialization at the end of the 19th century. In particular, companies such as the food processing company Amieux in France started programs similar to what is known now as a modern welfare state. They provided employees and their families with resources to help infants and mothers, including some paid maternity leave.² Later in the early twentieth century, the French government began to be involved more in home matters. The first instance was the old-age pension act of 1910, which provided an annual wage to all workers, male and female, in "industry, commerce, the liberal professions, agriculture, and domestic service, and to government employees both national and local" who were over the age of 65 and had an annual wage less than 3000 francs.³ However, this law was struck down by a high court before it could be implemented.⁴

¹ Fette, Brière, and Wylie, "La Démographie et l'État-Providence," 102.

² Frader, *Breadwinners and Citizens*, 93-96.

³ Perkins, "Old Age Pensions -- French Act of 1910," 566.

⁴ Douglas, "The French Social Insurance Act," 211.

After World War I, the modern social safety network started to develop more firmly, as a result of the newly reacquired Alsace-Lorraine, which, before the war, was under the control of Germany. At the time of German control, Alsace-Lorraine provided social insurance, so when France took over, the people were reluctant to give up the social insurance they were accustomed to receiving.⁵ This, coupled with the growing presence of Bolshevism, Communism, and Leninism in Europe, helped spur the French government into passing the first social insurance law in 1930.⁶ This law provided medical benefits for illness or injury and old age insurance to workers and maternity, death benefits, and medical care to the insured workers' families.⁷ This growing presence of Communism in Europe immediately following World War I, and fears of Communism that came along with it, is now known as the First Red Scare and occurred in both France and the United States.

Throughout the 20th century, the French welfare system continued to grow. In 1923, the French government formalized family allowances for families with at least three children and in 1925, a paid maternity leave system for all French women.⁸ There are a few ways that the Welfare State started showing signs of growth, such as the previously mentioned social insurance bill of 1930, the 1923 family allowances system, and the 1925 maternity leave system all being “universalized in the 1939 Family Code.”⁹ In addition, in his *Discours de Bayeux* in 1946, the future President Charles de Gaulle explained his belief of how a state should provide for its people, which he was able to implement when he became president in 1959. During his presidency, he partnered with Pierre Laroque to create the modern French Social Security system. Laroque stated in 1975 that following the Great Depression and “the political, economic,

⁵ Douglas, 212.

⁶ Douglas, 211-212.

⁷ Douglas, 211.

⁸ Frader, 182.

⁹ Frader, 182.

and social changes due to the war, after years of insecurity and uncertainty for tomorrow, the people want to have the guarantee that in any future circumstance, there will be assurance for their and their family's keep," thus further explaining de Gaulle and his own reasons for creating a modern and expansive Social Security system.¹⁰ Additionally, after World War II, people in some French colonies were given full citizenship, which allowed them to benefit from the same welfare opportunities that those in the *métropole* (or mainland) France had.¹¹ To continue President de Gaulle's welfare reforms, in 1977, President Valéry Giscard d'Estaing passed an unpaid parental (originally just maternal but it changed to parental following criticisms) leave law that would allow for parents to take one year, unpaid, off of work to care for their child and they would be able to return to their job after the year of leave, though the unpaid nature of the policy meant that women were more likely than men to be the parent who took the parental leave.¹² President François Mitterrand, in the 1980s, expanded Giscard d'Estaing's parental leave law, making it paid and including a large monthly allowance for two years to the parent who took leave for their third child.¹³ Such laws convinced many people of the benefits of the Welfare State in France, which is shown by how important public funding of welfare is for the French today.¹⁴

¹⁰ "Selon Pierre Laroque, La Sécurité Sociale Devait Être Au Cœur de La France de l'après-Guerre - Online Catalogue." [own translation]

¹¹ Former French colonies that did not become independent countries are fully part of France, with all the same rights (including voting and welfare) as those living in mainland France. They are called DROM (*départements et régions d'outre-mer*; overseas departments and regions), as mainland France's administrative districts are called *départements* and *régions*, with *régions* being made up by the *départements*. Do not confuse the French administrative districts' powers with the powers that American states have. This topic will be covered more in another section; Frader, 238.

¹² Frader, 236.

¹³ Frader, 237.

¹⁴ Fette, Brière, and Wylie, 98.

United States

While the Welfare State in France inspired many social changes, the United States was undergoing its own political transition. In the 19th and 20th centuries, for example, women's movements gathered momentum and in the process the Welfare State, which included women's issues, started taking shape. One outcome of this was the creation of settlement houses by women's groups, which paved the way for a welfare plan in the United States. In the U.S., Jane Addams established one of the first settlement houses called Hull House, located in Chicago.¹⁵ Jane Addams came from a wealthy family and desired to find her purpose in life outside of the expected life of marriage and children, so while traveling in Europe, she learned about a group of male college graduates who lived and worked with the urban poor.¹⁶ This inspired Jane Addams to find a group of female college graduates to do the same: live among, work with, and support the urban poor and immigrants in Chicago by helping working mothers, providing space for union meetings and political discussions, and helping immigrants adapt to American society.¹⁷

Jane Addams' efforts grew with increasing public support, and the idea of a settlement house turned into a movement that spread to major cities in the United States, such as New York City, Dallas, and San Francisco.¹⁸ Beyond that, the movement extended to all-Black settlement houses.¹⁹ Settlement houses were located mostly in immigrant or poorer neighborhoods of major cities – areas and people who needed the resources and services the most. These resources and services included day nurseries for working women, classes for immigrants to learn about being an American, and more cultural activities like a free art gallery. The work done by women in

¹⁵ DuBois and Dumenil, "Women in an Expanding Nation," 380.

¹⁶ DuBois and Dumenil, 402.

¹⁷ DuBois and Dumenil, 380-381.

¹⁸ DuBois and Dumenil, 382.

¹⁹ While it can be empowering to have opportunities to engage with those who have similar experiences to oneself, all-Black settlement houses came out of racism in white settlement houses, as many white women who ran the settlement houses would not work with or cater to Black women.

settlement houses led to the creation of professional social work. Efforts like the settlement houses were not replicated in the same way by the American national government, which at the time perceived such houses as family or private matters, and not contingent on government financial support and intervention.

During the Progressive Era of the early 20th century, some Welfare programs, advocated for by women, were implemented. One, the Sheppard-Towner Maternity and Infancy Protection Act of 1921 has some similarities with French maternity policies of the same era. The Sheppard-Towner Act aimed to provide instruction about maternal and infant hygiene and “proper care” for mothers and infants.²⁰ However, many people claimed it was unconstitutional, an example of socialism and communism, and/or an infringement of states’ rights, so even though the Supreme Court dismissed a challenge of its constitutionality, the program ended in 1929.²¹ While the maternal and infant protection program did not last as long as many progressives had hoped, it did set the stage for future maternal-focused programs.

At the same time as the women’s movement was making progress, the United States was recovering from the immeasurable losses and structural damages caused by World War I. Though the U.S. did not suffer nearly the same number of lives lost or structural damage in the war as France and other European countries, the growth of welfare programs did not gain much momentum after the war. In addition, the Great Depression hit the United States particularly hard, resulting in the government turning its attention to welfare programs like President Franklin D. Roosevelt’s New Deal. The New Deal aimed to prevent a stock market crash like Black Thursday and an economic collapse like the Great Depression through programs that

²⁰ Sklar, “The Historical Foundations of Women’s Power,” 78.; Rankin, Sheppard-Towner Maternity and Infancy Protection Act.

²¹ Sklar, “The Historical Foundations of Women’s Power,” 78.; Lemons, “The Sheppard-Towner Act,” 779-780, 782-785.

followed the three R's: relief, recovery, and reform. After World War I, the period of the First Red Scare in the United States inspired an intense fear of Communism, anarchism, and Bolshevism, due to real and imagined events, the most prominent being the October 17 Russian Revolution and anarchist bombings. During that time, many early Welfare policies were either struck down, let to expire, or were not passed because they were deemed "Red" or Communist and therefore anti-American.

After the stock market crash and President Herbert Hoover's more traditional actions regarding aiding Americans who were suffering from mass unemployment, evictions, and food insecurity, Americans were willing to support Roosevelt's proposal for government intervention. Government intervention took many forms. For instance, Frances Perkins, the United States' first female cabinet secretary, created the first welfare program we now call Social Security.²² This program became essential to the populace and continued to expand and flourish as it did in the 1960s, under President Lyndon B. Johnson's Great Society program. Johnson was greatly inspired by Roosevelt's New Deal and was able to continue many programs that Roosevelt wanted but was unable to push through Congress.²³

Johnson's vision for the Great Society aimed to help all Americans, even Black Americans who had traditionally been excluded from much of the New Deal.²⁴ These programs included Medicare and Head Start, two that still exist today.²⁵ That said, by the 1980s, the pendulum swung against welfare under the leadership of President Ronald Reagan, who cut a significant portion of welfare policies, scaled back or ended programs altogether. He was

²² DuBois and Dumenil, "Change and Continuity," 507.

²³ Foner, "The Sixties," 999; 1001.

²⁴ Poole, *Segregated Origins of Social Security*, 6.: Much of the racial discrimination in the New Deal and the original Social Security Act came not from the need to appease Southern Democrats but from northern lawmakers themselves who lived in a society that was heavily infused with racial prejudice and who found it economically and politically necessary to protect the privilege that white people were accustomed to.

²⁵ Schulman, *Lyndon B. Johnson and American Liberalism*, 90-91; 97-98.

instrumental in leading a cultural war against “welfare queens,” a popular racist belief that Black women were “married” to the government and would continue to have children they could not afford to take care of because the government would pay them when they had more children. He also believed that America’s problems were due to “government ‘meddling’” and that it would be best for Americans to have a limited welfare state. Reagan was instrumental in promoting a backlash to the idea of government assistance, a revival of pre-Great Depression American beliefs wherein his supporters protested for less government assistance and more free market.²⁶ The back and forth debate of American welfare – government assistance versus free market – still remains as one of the greatest differences between the two major political parties, the Democrats and the Republicans.²⁷ Both sides continue to have opposing beliefs about whether or not it is best for America and Americans to have a developed Welfare State.

²⁶ Schulman, 106.

²⁷ Though there are other political parties and ideologies in the United States – ex: Libertarian Party, Green Party, etc. – America remains a two party system. This is in contrast with France’s many party system, where there can be 11, 12, or even 16 candidates in the first round of a presidential election. These political parties span from far left Trotskists, to Communists, Socialists, traditional Republicans, and as far right as the *Rassemblement National* (previously known as the *Front National*), a far right pro-French and anti-immigrant political party.

Approaches to Welfare

The United States and France have contrasting approaches to how they conduct Welfare. The United States uses an approach described as “workfare,” whereas France has an *insertion* approach.²⁸ The “workfare” approach is based on a custom of deservingness, where those involved in the program are deserving of being helped and are called recipients, as they *receive* aid.²⁹ France’s *insertion* approach, in contrast, is based on a custom of solidarity and those being helped are called “wage earners,” as they earn a wage through the programs.³⁰ The American custom of deservingness can be explained by the phrase, “pull yourself up by your bootstraps.” Only those who have “pulled themselves up by their bootstraps” but still need help are deserving enough to receive that help. Help will not be given to just anyone, one needs to deserve it or work for it. This seems almost counterintuitive, as one would assume that help should and would be given to those who need it, not just those who know how to “work for it” because the work they have been doing is not enough.

The programs that best identify these two approaches are Temporary Assistance for Needy Families (TANF) in the United States and *Revenu Minimum d’Insertion* (RMI) in France. On the one hand, TANF refers to “temporary,” and shows how the United States thinks about assistance or aid. It is something that some people may need, but they can have it for only a short period of time or they will become dependent on it and on the state. Being “dependent” on the state goes against American ideas of capitalism and a free market, as in theory, everyone should be working hard and not require any additional help or aid. On the other hand, RMI can be translated to “minimum income for integration” meaning integration back into “normal” society where people are able to find jobs and make a living. Through RMI, the French

²⁸ Morel, “Workfare and Insertion,” 93.

²⁹ Morel, 96.

³⁰ Morel, 96.

government is fighting against the “exclusion” of those who have been failed by society, as it is society and the community’s responsibility to make sure that everyone is “included.”³¹

Welfare or asking for aid is incredibly stigmatized in the United States, unlike in France. The universality of many French programs, like paid parental leave or child allowances, makes receiving welfare more acceptable. In particular, the implementation of “the *Protection Maternelle et Infantile* [Maternal and Infantile Protection] in 1945 thereby constituted the definite passage from charity to a national responsibility and a turning away from the notion of social assistance to the notion of protection, regardless of the socioeconomic status and nationality of the recipients.”³² Included in the Preamble to the October 27, 1946 Constitution is *alinéa*, or paragraph, 10 stating, “The nation assures to the individual and to the family, the conditions necessary for their development.” Conversely, in order to be in line with American ideals of self-dependence, many American policies “are designed to push able-bodied adults into the work force by makes joblessness less appealing.”³³ Where the first approach emphasizes care and State protection, the second underscores the belief that it is shameful to receive assistance, or, according to some, be dependent upon public assistance, but at the same time, this approach does not provide useful solutions, especially since “declining market wages have made employment less attractive” and wages for “unskilled” labor have been decreasing.³⁴ While it can be useful for governments to encourage and sometimes mandate that people who receive Welfare are working, many American policies are a result of “political compromises, not research-based conclusions about what would make the best welfare policy.”³⁵ Rather than thinking about what

³¹ Morel, 97.

³² Burger, “Social History of Ideas,” 1014.

³³ Burtless, “Social Policy for the Working Poor,” 4.

³⁴ Burtless, 4.

³⁵ Weil, “Assessing Welfare Reform in the United States,” 146.

would be best for the American people, American politicians have to grapple with opposing opinions of welfare and must make compromises in order to pass anything through Congress. Rather than relying on the State to provide for the people and in order to make Welfare more in accordance with American values of self-dependence, the United States has instead depended on “voluntary or philanthropic non-profit organizations for purposes France has frequently assigned to the State.”³⁶ This practice created a liberal (meaning limited oversight and regulation) “Welfare State in the U.S. in which private market arrangements deal with childcare [and other Welfare programs] while public subsidies are mostly restricted to low-income families or families who have failed on their own even though private and public sectors have cooperated in some instances.”³⁷ This is directly opposed to the French belief that family matters are “a public concern, since children were regarded as both private and public goods” which has resulted in “State intervention in family affairs [being] socially more legitimized [in France] than in the U.S. where authorities remained ambivalent about the extent to which the state should assist families in childcare.”³⁸ Generally speaking, rather than viewing welfare as “an investment in the common good, like public schools, [or] as a necessity in an economy that has more workers than jobs and that has no other means to provide for people who are unable to fit into the job market,” which is how it is viewed in France, Americans perceive those receiving welfare as people who “have failed as individuals and are a burden on society.”³⁹ In this way, American and French Welfare policies reflect the culture’s view of how acceptable it is to give and receive public assistance. Each country holds a different view on *individualism*, a cultural value that is praised

³⁶ Burger, 1018.

³⁷ Burger, 1018.

³⁸ Burger, 1018.

³⁹ Poole, *Segregated Origins*, 2.

more in the United States than in France, where the individual depends on the well being of the common good.

American Decentralization

American and French Welfare States and policies present clear differences one can arguably link to their two distinct government forms. On the one hand, the United States is a Federal Government, meaning there are federal (or nation-wide) laws and policies, but at the same time, individual states can make their own unique laws and policies. State laws have to be in accordance with federal laws, with some exceptions. On the other, France's national government is unified, meaning all laws apply to all people in the country and individual "states," or *régions/départements*, cannot make their own unique laws. The only exceptions are some overseas territories that have varying degrees of autonomy.⁴⁰ The split between federal/national laws and programs and state laws and programs have resulted in decentralization in the American Welfare system.

France, as a unified country, does not permit local governments to make decisions that would affect only their section of the country and would go against national policy. In addition to the DROM (*départements et régions d'outre-mer*; overseas departments and regions), which do not have their own unique laws, there are five COM (*collectivités d'outre-mer*; overseas collectivities), which are able to make some specific laws. There is also New Caledonia, a *collectivité d'outre-mer spéciale* (special overseas collectivity), which has more autonomy than the COM and even has a local government that conducts interior affairs.⁴¹ Other than these six territories, no *département* or *région* in France can have specific, local laws.

Unlike French administrative districts, American states have most of the control over Welfare programs like the Temporary Assistance for Needy Families (TANF) program. TANF was established by the Personal Responsibility and Work Opportunity Reconciliation Act

⁴⁰ Fette, Brière, and Wylie, "L'administration," 179.

⁴¹ Fette, Brière, and Wylie, 179.

(PRWORA) of 1996, which completely changed the American Welfare System.⁴² Funding for TANF was different than for the previous child-related welfare program, Aid to Families with Dependent Children, which was open-ended funding, while TANF is block funding, meaning the federal government gives states a certain amount of money per year to distribute through TANF programming.⁴³ Although the money for TANF comes from the federal government, it is the states who decide how to parcel the money out and what incentives they decide to create to prevent money from being distributed to those who are not deemed “deserving.” For example, Idaho does not exempt mothers caring for young children from TANF work requirements while New Hampshire exempts mothers from working until their youngest child is three years old.⁴⁴ Federal guidelines limit the length of time individuals may receive cash assistance in their lifetime to 60 months, or five years.⁴⁵ States are allowed to grant “family hardship” extensions to the 60 month limit, but only for up to 20% of those receiving aid, which can help some people, but not all who need aid.⁴⁶ States can also lower the time limit for people receiving aid; for a few states, the limit is as low as 21 and 48 months.⁴⁷

Another element of TANF is it being category based. Whether or not someone is eligible for TANF is dependent on various characteristics that they might have, including marital status, age, and income.⁴⁸ The two most important categories are the age of the children in the family and the sex of the recipient or parent/guardian.⁴⁹ The category-based nature of American Welfare programs like TANF is the basis of American Welfare. People need to qualify for Welfare based on their characteristics, or situation, and then they can be given that aid. This is in contrast with

⁴² Matsudaira and Danziger, “Work, Welfare, and Economic Well-being,” 167.

⁴³ Gilbert, “Welfare Policy in the United States,” 60-61.

⁴⁴ Matsudaira and Danziger, 170.

⁴⁵ Matsudaira and Danziger, 169.

⁴⁶ Gilbert, 62.; Matsudaira and Danziger, 169.

⁴⁷ Matsudaira and Danziger, 169.

⁴⁸ Morel, “Workfare and Insertion,” 95-96.

⁴⁹ Morel, 99.

the more universalist tendency the French use when it comes to many Welfare programs like *Revenu Minimum d'Insertion*.

The decentralized Welfare system in the United States can result in people not receiving the same forms of aid. Aid can differ for those who live in different states and have variable financial situations. Under PRWORA, states now have a range of time limits and eligibility requirements, including, but not limited to, rules about job training or searching and childcare.⁵⁰ This decentralization and the domination of the individual states prevents the United States from having universal or nation-wide Welfare programs that could be more beneficial to Americans than the current system.

⁵⁰ Matsudaira and Danziger, 167.

Economics

Until the end of the 19th century or early 20th century, both the United States and France practiced traditional liberal or capitalist economic methods, but emerging theories of freedom and issues around industrialization began to catch up with traditional ideals. The traditional capitalist method was laissez-faire, which translates to “leave to do,” meaning that the government left regulation activities to the companies. However, capitalism at its core is inherently racist and discriminatory, as the goal is to keep manufacturing costs low.⁵¹ This has historically been accomplished by calling certain positions “unskilled” and relegating them to minorities, paying women less than men, and enslaving people.

The French favor freedom as the right to exist or to be, which is in direct contrast with American ideas of freedom, which are the right to do or to make.⁵² These American ideals are related to the desire to have a capitalist free market, something which is less favored by the French today.⁵³ This disliking of liberal capitalism was shown during the 2005 referendum about whether or not the French would ratify a Constitution for Europe, as much of the discussion leading up to the vote was focused on which vote would “protect [the] ‘French social model’ from the advance of unbridled Anglo-Saxon liberalism.”⁵⁴ This “social model” includes the French Welfare System, which by 2005 included everything from labor protections to child and family policies.⁵⁵

American President Franklin D. Roosevelt redefined the words “liberal” and “freedom” while he was campaigning for his New Deal. “Liberal” had been tied to laissez-faire policies, but Roosevelt gave “liberal” its modern meaning of openness to change and generally being in favor

⁵¹ Frader, *Breadwinners and Citizens*, 53.; Poole, *Segregated Origins*, 3.

⁵² Fette, Brière, and Wylie, “L'économie,” 217.

⁵³ Fette, Brière, and Wylie, 217.

⁵⁴ Frader, 1.

⁵⁵ Frader, 1.

of government regulation.⁵⁶ Roosevelt also linked “freedom” to economic security with freedom’s enemy being economic inequality and stated that the liberty of democracy is not safe if citizens cannot sustain or afford an acceptable standard of living.⁵⁷

President Lyndon B. Johnson continued many of Roosevelt’s ideas, including his definition of freedom, which mostly had been forgotten or ignored in the years following World War II, in his program, the Great Society. One definition of freedom that Johnson highlighted was the “freedom from want” and to have freedom means no one is prevented from being able to accomplish their goals.⁵⁸ For Johnson, it was important that his programs resulted in “equality as a fact and as a result,” rather than as “a right and a theory,” because equal opportunities for all do not fix the centuries during which Black people were overtly and subconsciously discriminated against.⁵⁹

President Ronald Reagan’s definition of freedom was the opposite of Johnson’s and he aimed to undo many of Roosevelt and Johnson’s programs. For Reagan, economic freedom “meant curtailing the power of unions, dismantling regulations, and radically reducing taxes.”⁶⁰ Reagan railed against the Great Society, stating that “government began eating away at the underpinnings of the private enterprise system. . . . By the time the full weight of Great Society programs was felt, economic progress for America’s poor had come to a tragic halt.”⁶¹ Reagan campaigned for “removing regulations and offering tax incentives” as a way to stimulate economic growth with programs that he referred to as “government meddling.”⁶² His policies “sharply reduced funding for Great Society antipoverty programs such as food stamps, school

⁵⁶ Foner, “The New Deal,” 839.

⁵⁷ Foner, 839.

⁵⁸ Foner, “The Sixties,” 1001.

⁵⁹ Foner, 1001.

⁶⁰ Foner, “The Conservative Turn,” 1063.

⁶¹ Reagan, “Remarks at a National Black Republican Council Dinner.”

⁶² Schulman, *Lyndon B. Johnson and American Liberalism*, 106.

lunches, and federal financing of low-income housing. But it left intact core elements of the welfare state, such as Social Security, Medicare, and Medicaid, which many conservatives wished to curtail significantly or repeal.”⁶³

When factories were built for mass manufacturing of goods, workplace accidents became “an urgent and completely new reality,” requiring “reform, modification, and transformation of the array of procedures and institutions through which the accident had to this point been grasped, analyzed, and treated.”⁶⁴ The modern idea of Welfare did not emerge from nowhere, it was how society reacted to modernization, industrialization, and a new and different economy. Welfare was the result of new ideas about the role of government and how the government could help, or not help its citizens. During the period of deindustrialization of the 1980s and 1990s in the United States, “some of the same social traumas that attended industrialization in the 1880s and 1980s” were present.⁶⁵ There was “civil disorder, massive immigration, urban transformation, poverty, homelessness, and an intractable political malaise” during both periods, but widely different outcomes.⁶⁶ During industrialization, there were women’s groups that aimed to fix many of the issues, but during deindustrialization, government policies advocated for returning to more laissez-faire style economics, which would help the companies instead of the wider population.⁶⁷

⁶³ Foner, 1069.

⁶⁴ Ewald, *The Birth of Solidarity*, 142.

⁶⁵ Sklar, “The Historical Foundations of Women’s Power,” 45.

⁶⁶ Sklar, 45.

⁶⁷ Foner, 1063.

Role of State

Welfare differs widely between the United States and France, especially when it comes to the acceptable role of the State in personal or family matters. One of the major reasons for this is that both countries have had different understandings of what communism and socialism entail, and both were affected by the First Red Scare, which had global consequences that occurred after the Russian Revolution of 1917 and the end of World War I.⁶⁸ During the First Red Scare, there was “increased strike activity and the founding of the French Communist Party” which “provoked fears that a worldwide socialist revolution was at hand.”⁶⁹ However, after the Second Red Scare following World War II, where the United States condemned communism, France continued to align with the party values in ways that shaped the country’s future policies. This period can be considered to be a turning point between the two countries’ approach to Welfare.

In particular, the French Communist Party and other left-wing parties were very influential in the years between the two world wars. In 1936, the Popular Front, a coalition of the Socialists, Communists, and Radicals swept the elections and implemented many of the early reforms, including the 40-hour work week and a two-week paid vacation.⁷⁰ While the French Communist Party (PCF – *Parti Communiste Française*) was outlawed in 1939 and was illegal through the end of World War II under the Vichy government, it played an important role in the French Resistance and in the creation of the Fifth Republic as a legitimate and recognized party.⁷¹ The PCF continues to exist today, but it is less popular than it was in the 1930s, 50s, and 60s.

⁶⁸ Roberts, *Civilization Without Sexes*, 5.

⁶⁹ Roberts, 5.

⁷⁰ Klements, “Workers, Mothers, and Françaises,” 4, 87.

⁷¹ Klements, 4, 101, 105.

In contrast, the United States had and still has significant fears about the country becoming communist, socialist, or “Soviet” stemming from the two Red Scares, so there have been fewer successful attempts at broad government intervention. For example, in the 1930s, opponents of the New Deal, in particular the U.S. Chamber of Commerce charged President Roosevelt with trying to “Sovietize” the United States with the New Deal programs.⁷² Additionally, in 2019, 55% of Americans had a negative view of socialism, with almost 20% of those people stating that it decreases people’s work ethic and makes them reliant on the government.⁷³

When the United States was aiding France and other European countries in the aftermath of World War II, they made deliberate choices about which political parties to favor. The United States chose to work with the Christian Democrats in Italy and Germany but did not work with the French Christian Democrats because they had different views relating to Germany than the United States had.⁷⁴ The United States did not want to “isolate the entire French left or the entire working class” but at the same time feared the PCF’s influence in France, so it was decided to work with the Socialist Party.⁷⁵ However, the United States only really worked with the Socialist Party when they were actively being anti-communist because anti-communism was an important American policy in the years after World War II.⁷⁶

While Americans were increasingly involved in anti-communist trends, the support for communism in France grew steadily as it was seen as a direct link to a universal welfare system that ensures well-being and health coverage to all people from birth to death.⁷⁷ This difference of approach to Welfare secured the continued split between French and American politics over the

⁷² Foner, “The New Deal,” 842.

⁷³ Atske, “In Their Own Words.”

⁷⁴ Rice-Maximin, “The United States and the French Left, 1945-1949,” 730, 733, 735.

⁷⁵ Rice-Maximin, 730.

⁷⁶ Rice-Maximin, 744.

⁷⁷ Fette, Brière, and Wylie, “La Démographie et l’Etat-Providence,” 98.

State's role in providing citizens with universal care, versus private enterprise. That said, some critics see the French Welfare approach of paternalism to be socialism instead.⁷⁸

In the 20th century, after many attempts to extend “civil and political rights failed to eliminate major gaps in economic and social status, [countries] recognized the need to take responsibility for reducing social inequality by providing certain minimum standards of life for all,” France emerged as more enthusiastic about the Welfare State providing those basic necessities for the general populous than the United States, which took increasing pride in promoting policies that resulted in a support of individualism as defined by the capitalist model.⁷⁹

⁷⁸ Fette, Brière, and Wylie, 98.

⁷⁹ Frader, *Breadwinners and Citizens*, 1-2.

Gender

The American and French Welfare Systems treat and recognize genders in different ways. The varying treatment is not limited to women, as men in each country have different roles in relation to receiving Welfare. The system of the patriarchy affects women in the United States differently from women in France. The system in France acts as a parent watching over the French people while in America, the system is rooted in patriarchal ideas about how women can and should be working.

The roots of the French system are in pronatalism and repopulating the country after horrific wars. Even before the French loss in the Franco-Prussian War of 1870 and the devastation of both World Wars, France had years of decreasing birth rates: 22 births per year per 1,000 residents in 1900, which was down from 32 births per year per 1,000 residents in 1800.⁸⁰ Over time, especially after World War I, the French system left its ideas about providing enough resources to keep women at home. The human toll of the war was so great, that France needed women working *and* having many children to repopulate the country, so services like paid maternity leave, delivery and postnatal care, and monthly nursing allowances were deemed necessary.⁸¹ Child allowances, another element of the Welfare System, was implemented in the 1930s, but they were broadened from once a family had a third child to any child a family has.⁸² These child allowances “recognized women’s rights as wage earners. The French system was based on a relatively weak male breadwinner norm that supported women’s high rates of employment with maternity leaves, family allowances, direct payment of allowances to mothers that implicitly recognized their status as workers, and ultimately a range of child-care options

⁸⁰ Fette, Brière, and Wylie, “La Démographie et l’Etat-Providence,” 100.

⁸¹ Frader, *Breadwinners and Citizens*, 21.; Klaus, “Depopulation and Race Suicide,” 195.

⁸² Douglas, “The French Social Insurance Act,” 234.; Fette, Brière, and Wylie, 102.

(after 1945).”⁸³ This act of pronatalism can be regarded as rewarding everyone, not just men, or punishing just women for having more children, which in turn helps women.

Men were also vital to the pronatalist stance in France. Following World War I, men were praised for being prolific fathers, and pronatalist leaders would promote fatherhood by “drawing comparisons between men’s duty to perform military service and their duty to produce children.”⁸⁴ French leaders started to redefine masculinity even before World War I and targeted men just as much as women, if not more, for the low and decreasing birth rate.⁸⁵ By tying fatherhood to masculinity and military service, “fatherhood thus could be defined as a form of national service and rewarded with work” and more job seniority based on the number of children he had.⁸⁶

The American system, in contrast, has remained focused on the idea of a “suitable home.”⁸⁷ The custom of deservingness has its roots in the British Poor Laws, where poor people were categorized as either deserving or non-deserving poor people and sent to work in unsanitary workhouses for very little money.⁸⁸ This is very problematic, as it prevents those who need aid but are “not deserving” of the aid from receiving it, thus relegating a whole section of the population to being perpetually poor. As part of this distinction between deserving and non-deserving, there is “a control of the work patterns of women within the family. ... [The] adoption of rules such as the ‘suitable home’ rule, ... is applied as part of the assistance program for needy mothers.”⁸⁹ Regulating women and their work opportunities shows the American cultural desire to have one parent, usually the mother, at home with the children and the other

⁸³ Frader, 4.

⁸⁴ Frader, 25.

⁸⁵ Frader, 25.

⁸⁶ Frader, 42.

⁸⁷ Morel, “Workfare and Insertion,” 98.

⁸⁸ Morel, 98.

⁸⁹ Morel, 98.

parent, usually the father, outside of the home working. With rules such as the “suitable home” rule, the American system has clearly defined the “family” as the nuclear family, two different gendered parents and their children. This definition alienates non-nuclear families, in particular families that have a single parent and more specifically single mother households, which have been the largest group of people who receive Welfare.⁹⁰ Single mothers, and in particular Black single mothers, have been the targets of those who are wishing to cut Welfare spending, as they are not in accordance with the “suitable home” rule.

It is possible to also see the difference between how the United States and France treat women with the abortion debates that are currently happening. France legalized abortion in 1975 with a law proposed by Health Minister Simone Veil and has continued to extend access to abortions ever since.⁹¹ Currently in France, abortions are viewed as a private medical choice between the woman and her doctor, rather than in terms of morality as it is often treated in the United States, and there are not violent protests at abortion clinics or in the street or politicians having to declare their opinion on the subject.⁹² Abortions had been illegal in France, as women were expected to do their part for the country and have many children.⁹³ However, when abortion is criminalized and made illegal, the risk of complications from so-called “back-alley abortions” can range from incomplete abortions to hemorrhaging and long-term disabilities and about 5-13% of maternal deaths each year can be attributed to unsafe abortions.⁹⁴ The American custom of deservingness is shown in healthcare as “you get what you afford,” while the French custom of solidarity is shown as all people receiving the same amount of healthcare. French paternalism has decided that the well-being of women is necessary for the well-being of the

⁹⁰ Morel, 98.

⁹¹ Fette, Brière, and Wylie, “La Famille,” 86.

⁹² Fette, Brière, and Wylie, 93.

⁹³ Frader, 4.

⁹⁴ World Health Organization, *Abortion*.

State, therefore by providing access to abortions and other forms of healthcare, they can protect the future of the country, as women are not dying or being disabled by unsafe abortions.

Conclusion

While it might be easy to idealize one system over the other, the United States and France are still two very different countries with unique sets of values. The American system would likely meet resistance if the government tried to implement it in France and the same would occur in the United States. The Welfare State remains a point of contention and any attempts to significantly alter or change it are met with resistance in both countries. As we are seeing with French President Emmanuel Macron's attempt to raise the French age of retirement from 62 to 64, the French will practically burn the capital to make their message heard.⁹⁵ The Affordable Care Act and the creation of Obamacare under former US President Barack Obama sparked outrage among right-leaning politicians and voters, with many calling it socialism just after it passed and some still calling it socialist today.⁹⁶ Both the United States and France were founded on the same principles – liberty, freedom, and opportunity for all – but in the course of history, the United States and France have created different cultural norms and expectations, resulting in the two countries each choosing a different direction and system when it comes to Welfare.

⁹⁵ Méheut, "Spams of Violence Jolt Paris."

⁹⁶ Ocbazghi, "Republicans Have Themselves to Thank for Socialism."

Bibliography

- Atske, Sara. "In Their Own Words: Behind Americans' Views of 'Socialism' and 'Capitalism.'" *Pew Research Center - U.S. Politics & Policy* (blog), October 7, 2019. <https://www.pewresearch.org/politics/2019/10/07/in-their-own-words-behind-americans-views-of-socialism-and-capitalism/>.
- Burger, Kaspar. "A Social History of Ideas Pertaining to Childcare in France and in the United States." *Journal of Social History* 45, no. 4 (2012): 1005–25.
- Burtless, Gary. "Social Policy for the Working Poor: U.S. Reform in a Cross-National Perspective." In *Welfare Reform: A Comparative Assessment of the French and U.S. Experiences*, edited by Neil Gilbert and Antoine Parent, 10:3–40. International Social Security Series. New Brunswick, NJ: Transaction Publishers, 2004.
- Douglas, Paul H. "The French Social Insurance Act." *The Annals of the American Academy of Political and Social Science* 164 (1932): 211–48.
- DuBois, Ellen Carol, and Lynn Dumenil. "Change and Continuity: Women in Prosperity, Depression, and War, 1920-1945." In *Through Women's Eyes: An American History*, Fifth., Two:482–549. Boston, MA: Bedford/St. Martin's, 2019.
- . "Women in an Expanding Nation: Consolidation of the West, Mass Immigration, and the Crisis of the 1890s." In *Through Women's Eyes: An American History*, Fifth., Two:356–417. Boston, MA: Bedford/St. Martin's, 2019.
- Ewald, François. *The Birth of Solidarity: The History of the French Welfare State*. Edited by Melinda Cooper. Translated by Timothy Scott Johnson. Durham, NC: Duke University Press, 2020.
- Fette, Julie, Jean-François Brière, and Laurence Wylie. "L'administration." In *Les Français*, Fourth., 169–83. Indianapolis, IN: Hackett Publishing Company, Inc., 2021.
- . "La Démographie et l'Etat-Providence." In *Les Français*, Fourth., 97–114. Indianapolis, IN: Hackett Publishing Company, Inc., 2021.
- . "L'économie." In *Les Français*, Fourth., 217–35. Indianapolis, IN: Hackett Publishing Company, Inc., 2021.
- . "La Famille." In *Les Français*, Fourth., 84–96. Indianapolis, IN: Hackett Publishing Company, Inc., 2021.
- Foner, Eric. "The Conservative Turn." In *Give Me Liberty!: An American History*, Seagull Sixth., 1032–75. New York, NY: W. W. Norton & Company, 2020.
- . "The New Deal." In *Give Me Liberty!: An American History*, Seagull Sixth., 818–60. New York, NY: W. W. Norton & Company, 2020.
- . "The Sixties." In *Give Me Liberty!: An American History*, Seagull Sixth., 985–1031. New York, NY: W. W. Norton & Company, 2020.
- Frader, Laura Levine. *Breadwinners and Citizens: Gender in the Making of the French Social Model*. Durham, NC: Duke University Press, 2008.

- Gilbert, Neil. "Welfare Policy in the United States: The Road from Income Maintenance to Workfare." In *Welfare Reform: A Comparative Assessment of the French and U.S. Experiences*, edited by Neil Gilbert and Antoine Parent, 10:55–66. International Social Security Series. New Brunswick, NJ: Transaction Publishers, 2004.
- Klaus, Alisa. "Depopulation and Race Suicide: Maternalism and Pronatalist Ideologies in France and the United States." In *Mothers of a New World: Maternalist Politics and the Origins of Welfare States*, edited by Seth Koven and Sonya Michel, 188–212. New York, NY: Routledge, Inc., 1993.
- Klements, Elizabeth. "Workers, Mothers, and Françaises: The French Communist Party and Women in the Interwar Period (1920 - 1939)." Master's, University of Central Florida, 2022.
- Lemons, J. Stanley. "The Sheppard-Towner Act: Progressivism in the 1920s." *The Journal of American History* 55, no. 4 (1969): 776–86. <https://doi.org/10.2307/1900152>.
- Matsudaira, Jordan, and Sheldon H. Danziger. "Work, Welfare, and Economic Well-Being after Welfare Reform: Do State Policies Make a Difference?" In *Welfare Reform: A Comparative Assessment of the French and U.S. Experiences*, edited by Neil Gilbert and Antoine Parent, 10:167–86. International Social Security Series. New Brunswick, NJ: Transaction Publishers, 2004.
- Méheut, Constant. "‘It Just Feels Good to Vent Your Anger’: Spasms of Violence Jolt Paris." *The New York Times*, March 24, 2023, sec. World. <https://www.nytimes.com/2023/03/24/world/europe/france-protests-macron-pensions.html>
- Morel, Sylvie. "Workfare and Insertion: How the U.S. and French Models of Social Assistance Have Been Transformed." In *Welfare Reform: A Comparative Assessment of the French and U.S. Experiences*, edited by Neil Gilbert and Antoine Parent, 10:93–144. International Social Security Series. New Brunswick, NJ: Transaction Publishers, 2004.
- Ocbazghi, Emmanuel. "Republicans Have Themselves to Thank for Socialism." *Business Insider*, August 28, 2019. <https://www.businessinsider.com/republicans-socialism-democratic-obamacare-bernie-sanders-aoc-socialist-2019-8>.
- Perkins, Clarence. "Old Age Pensions -- French Act of 1910." *The American Political Science Review* 4, no. 4 (1910): 565–69. <https://doi.org/10.2307/1944937>.
- Poole, Mary. *Segregated Origins of Social Security: African Americans and the Welfare State*. Chapel Hill, NC: The University of North Carolina Press, 2006.
- Rankin, Jeannette. Sheppard-Towner Maternity and Infancy Protection Act, Pub. L. No. H.R. 12634 (1918). <https://www.visitthecapitol.gov/artifact/hr-12634-bill-encourage-instruction-hygiene-maternity-and-infancy-july-1-1918>.
- Reagan, Ronald. "Remarks at a National Black Republican Council Dinner." Speech, New York

- City, September 15, 1982. Ronald Reagan Presidential Library & Museum.
<https://www.reaganlibrary.gov/archives/speech/remarks-national-black-republican-council-dinner>.
- Rice-Maximin, Edward. "The United States and the French Left, 1945-1949: The View from the State Department." *Journal of Contemporary History* 19, no. 4 (1984): 729–47.
- Roberts, Mary Louise. *Civilization Without Sexes: Reconstructing Gender in Postwar France, 1917-1927*. Chicago: The University of Chicago Press, 1994.
- Schulman, Bruce J. *Lyndon B. Johnson and American Liberalism: A Brief Biography with Documents*. Boston, MA: Bedford/St. Martin's, 2007.
- Selon Pierre Laroque, La Sécurité Sociale Devait Être Au Cœur de La France de l'après-Guerre - Online Catalogue." n.d. Accessed September 28, 2022.
https://www.siv.archives-nationales.culture.gouv.fr/siv/rechercheconsultation/consultation/multimedia/Galerie.action?irId=FRAN_IR_019870&udId=d_1_51_5.
- Sklar, Kathryn Kish. "The Historical Foundations of Women's Power in the Creation of the American Welfare State, 1830-1930." In *Mothers of a New World: Maternalist Politics and the Origins of Welfare States*, edited by Seth Koven and Sonya Michel, 43–93. New York, NY: Routledge, Inc., 1993.
- Weil, Alan. "Assessing Welfare Reform in the United States." In *Welfare Reform: A Comparative Assessment of the French and U.S. Experiences*, edited by Neil Gilbert and Antoine Parent, 10:145–66. International Social Security Series. New Brunswick, NJ: Transaction Publishers, 2004.
- World Health Organization. *Abortion*. 2021. Fact sheet.
<https://www.who.int/news-room/fact-sheets/detail/abortion>. (accessed April 27, 2023).

Images:

- Carlu, Jacques. *Les Revendications des Bébés*. 1919 1914. Lithograph, 24.2 x 32.2 in.
- Dividing the National Map. United States, 1860. [Cincinnati?: s.n] Photograph.
<https://www.loc.gov/item/2008661606/>.
- Grach, Phili and Ch. Stéfani, "La Famille: fruit du passé, germe de l'avenir," Lithograph, Bibliothèque Marguerite Durand, In *Reign of Virtue: Mobilizing Gender in Vichy France* by Miranda Pollard, 55, Chicago, IL: The University of Chicago Press, 1998.
- Refregier, Anton, "Freedom from fear, Freedom from want, Freedom of speech, Freedom of worship," In *Give Me Liberty!: An American History* by Eric Foner, 925, New York, NY: W. W. Norton & Company, 2020.
- [Thrift Exhibit], Young Men's Christian Associations Collection, [Box 64], Hoover Institution Library & Archives.
- "Une des causes profondes de la guerre actuelle a été notre faible natalité," In *Civilization Without Sexes: Reconstructing Gender in Postwar France, 1917-1927* by Mary Louise Roberts, Figure 15, Chicago, IL: The University of Chicago Press, 1994.
- Wilkinson, Signe. *Political Cartoon: America's Homelessness Problem*. September 13, 2020.

<https://www.inquirer.com/opinion/cartoons/homeless-democrats-republicans-americans-poverty-economy-20200913.html>.