

Review Article

Impeachment as Constitutional Accountability and Political Instrumentalization: A Comparative Systematic Literature Review

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Received: 01 August 2026; Revised: 1 October 2026;
Accepted: 13 October 2026; Published: 20 October 2026

DOI: <https://doi.org/10.66074/X9B2C5V7K>

Abstract

Impeachment is a hybrid constitutional mechanism at the intersection of law and politics, designed to enforce accountability yet susceptible to strategic political deployment. This duality appears in recent cases. In the Philippines, Sara Duterte was impeached by the House in 2025 on charges of fund misuse and betrayal of public trust, only for the Supreme Court to nullify the proceedings on a procedural technicality. In the United States, Donald Trump became history's only twice-impeached president, acquitted both times along strict party lines. In France, former President Nicolas Sarkozy was convicted of corruption by the Court of Cassation in 2024 through a judicial, not legislative, process. In Italy, former Prime Minister Silvio Berlusconi survived decades of legal proceedings through coalition-protected maneuvering. Despite growing scholarship, literature remains fragmented across legal, political, and comparative domains. Guided by PRISMA-informed identification and screening procedures, conducted as a single-reviewer systematic literature review across six databases (Scopus, Web of Science Core Collection, HeinOnline, JSTOR, ProQuest Central, and Google Scholar) covering publications from 1913 to 2025, this review examined impeachment as both a mechanism of constitutional accountability and a form of political instrumentalization across the Philippines, the United States, France, and Italy. Following PRISMA-guided screening of 921 records, 159 studies were included in the final synthesis. Synthesis organized findings into five

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categories: (1) conceptual foundations of impeachment, (2) institutional and legal design conditions, (3) political and strategic dynamics, (4) comparative country patterns, and (5) democratic and constitutional implications. Findings reveal impeachment is a vital but fragile institution whose effectiveness depends on procedural safeguards, evidentiary seriousness, institutional independence, and democratic norms. Under partisan polarization, coalition instability, and procedural vulnerability, impeachment is frequently instrumentalized, undermining its legitimacy. Strengthening safeguards and institutional independence, and mitigating partisanship, are essential to preserving impeachment's constitutional role.

Keywords: constitutional design, democratic governance, political polarization, rule of law, separation of powers

1. Introduction

Impeachment is among the most powerful yet contested institutions within constitutional democracies. Designed as an extraordinary mechanism for the removal of high public officials, impeachment occupies a unique position at the intersection of law and politics. It is neither a purely judicial process nor a wholly political act; rather, it is a hybrid constitutional device through which democratic systems seek to enforce accountability, preserve institutional integrity, and respond to crises of governance (Ginsburg et al., 2021; Ohnesorge, 2021). Across jurisdictions, impeachment has been invoked to address executive misconduct, judicial impropriety, and broader threats to constitutional order (Cole & Garvey, 2015; Dougherty, 1913; Rotunda, 1988). Yet, despite its formal grounding in constitutional law, the operation of impeachment remains deeply shaped by political incentives, partisan alignments, and institutional context (Gerhardt, 1999; Turley, 1999; Zaznaev, 2020).

In contemporary scholarship, impeachment is increasingly understood not as a singular or uniform mechanism but as a dual-function institution (Brown, 2024; Ginsburg et al., 2021; Tokatlı, 2024). On one hand, it operates as a mechanism of constitutional accountability, designed to uphold the rule of law, protect public trust, and constrain abuses of power (Cole & Garvey, 2015; Holtzman, 2008). On the other hand, it is susceptible to political instrumentalization, where legal procedures are strategically deployed to advance partisan, factional, or coalition-based objectives (Apelbaum, 2025; Dreyer, 2022; Zaznaev, 2020). This duality is particularly evident in modern democratic systems, where impeachment proceedings frequently reflect both genuine constitutional concerns and broader struggles for political power (Ginsburg et al., 2020; Pérez-Liñán, 2018).

The tension between these two functions has become more pronounced in recent decades. In the United States, successive presidential impeachments have highlighted the increasing role of partisan polarization, media fragmentation, and electoral incentives in shaping impeachment outcomes (Apelbaum, 2025; Harrington & Waddan, 2023; Whittington, 1999). In the Philippines, impeachment has similarly been embedded within elite bargaining, coalition dynamics, and institutional asymmetries, raising questions about its effectiveness as a tool of accountability (Hinojosa & Pérez-Liñán, 2006). Meanwhile, in Western European contexts such as France and Italy, impeachment or impeachment-like mechanisms operate within different constitutional architectures, where accountability is often mediated through alternative institutional pathways, including parliamentary responsibility, constitutional courts, or electoral processes (Tokatlı, 2024; Ginsburg et al., 2021).

Despite the growing body of scholarship on impeachment, the literature remains fragmented across legal, political, and comparative domains (Ginsburg et al., 2021; Ohnesorge, 2021). Three major gaps persist: existing scholarship often treats impeachment either as a legal institution or as a political process, without fully integrating these perspectives (Gerhardt, 1999; Turley, 1999); there is a lack of systematic comparative analysis across different democratic contexts, with U.S.-focused studies dominating the literature (Brown, 2024; Ohnesorge, 2021); and prior reviews of impeachment tend to be narrative rather than systematic, lacking transparent methodologies, explicit inclusion criteria, and structured synthesis frameworks (Page et al., 2021).

Accordingly, this systematic literature review aims to address these gaps by providing a comprehensive and analytically rigorous synthesis of impeachment scholarship across the Philippines, the United States, France, and Italy. This synthesis moves beyond categorization by explicitly cross-reading legal-doctrinal and political-empirical literatures against one another for each jurisdiction, using the extracted conditions (procedural safeguards, coalition dynamics, and information environment) as a common comparative vocabulary; this cross-reading is what allows the review to identify convergences and divergences that no single disciplinary strand documents on its own, and it is formalized in the Impeachment Function Continuum proposed in Section 4.2.

The study is guided by four research objectives. Specifically, it aims to examine how impeachment is conceptualized in the literature as both a mechanism of constitutional accountability and a form of political instrumentalization; identify the institutional, legal, and political conditions under which impeachment functions as a credible accountability mechanism; determine the circumstances under which impeachment is primarily used as a political instrument; and synthesize the broader implications of impeachment practices for the rule of law, separation of powers, democratic legitimacy, and constitutional stability.

2. Methodology

2.1 Review Design

This study is a systematic literature review, conducted and reported in accordance with the Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA) 2020 guideline (Page et al., 2021). It follows a pre-specified search strategy, explicit eligibility criteria, a documented screening and inclusion sequence, structured data extraction, and a quality appraisal step. Because the literature spans doctrinal-legal, empirical-political, and comparative-constitutional work that differ in design and evidentiary logic, the synthesis is thematic rather than meta-analytic and combines these source types within a single analytical framework (Whittemore & Knafl, 2005). One deviation from the independent dual-reviewer standard is disclosed here: study selection, data extraction, and quality appraisal were performed by a single reviewer, the author, as permitted by PRISMA 2020 when the number of reviewers and whether they worked independently are reported. The rationale, mitigation, and implications of this deviation are set out in Section 2.4 and Section 5.1. Unlike traditional narrative reviews, this approach follows a structured, protocol-driven process of identifying, screening, evaluating, and synthesizing the literature, which suits the interdisciplinary and fragmented nature of impeachment scholarship across constitutional law, political science, and comparative governance.

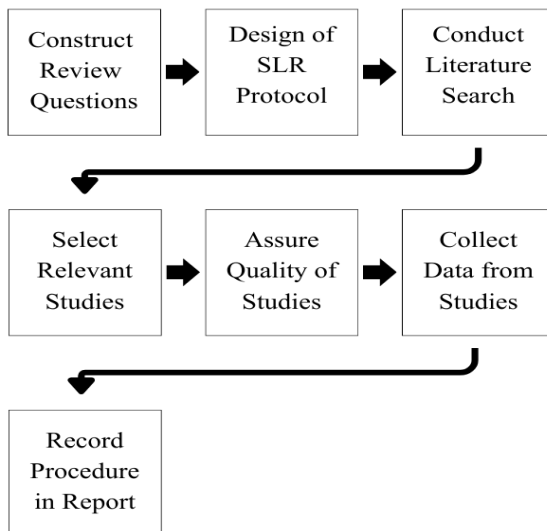


Figure 1. Diagram showing the systematic literature review procedure.
 Source: Author's own diagram, adapted from *Changing Practice* (2001).

2.2 Search Strategy

The search strategy identified core conceptual domains, operationalized as iteratively refined Boolean search strings, applied across major academic databases. The procedure is outlined in Table 1.

Table 1. Search strategy used in the systematic literature review.

Stage	Search Process	Description
Stage 1	Identification of Key Terms and Search Strings	Databases searched: Scopus, Web of Science (Core Collection), HeinOnline, JSTOR, ProQuest Central, and Google Scholar. Boolean search strings combined terms for: (1) impeachment and constitutional removal; (2) accountability and constitutional governance; (3) political instrumentalization and partisan-strategic use; and (4) jurisdictional identifiers limited to the Philippines, the United States, France, and Italy. Sample string: ("impeachment" OR "constitutional removal") AND ("constitutional accountability" OR "political instrumentalization") AND ("Philippines" OR "United States" OR "France" OR "Italy"). Five Boolean search strings were applied per database, corresponding to Figure 2 ("Boolean Search Strings 1-5"): String 1 – core impeachment/removal terms only ("impeachment" OR "constitutional removal" OR "removal from office"); String 2 – impeachment AND constitutional accountability terms; String 3 – impeachment AND political instrumentalization terms ("partisan" OR "politically motivated" OR "weaponization"); String 4 – impeachment AND jurisdictional identifiers (Philippines, United States, France, Italy); String 5 – the combined string shown above, run as a final consolidation pass across all four conceptual domains and all four jurisdictions. Search logs recording per-string, per-database results are retained by the authors and are available on request.
Stage 2	Conducting the Search and Screening	Search strings applied across all databases. Retrieved records screened by title and abstract using predefined eligibility criteria. Inclusion: English-language studies with accessible full text directly addressing impeachment within the Philippines, United States, France, or Italy. Exclusion: non-English, no full text, duplicates, non-academic materials, works where impeachment is incidental, studies outside defined jurisdictional scope.
Stage 3	Reference List Search	Bibliographies of selected studies were systematically examined to identify additional relevant sources not captured in the initial database search. No additional studies meeting inclusion criteria were identified (n = 0).

2.3 Eligibility Criteria

Explicit inclusion and exclusion criteria were applied to ensure methodological rigor and analytical relevance. Table 2 summarizes the criteria organized using a Population-Concept-Context (PCC) framework.

Table 2. Inclusion and exclusion criteria.

Criterion	Inclusion	Exclusion
Population	Impeachable public officials, institutional actors involved in impeachment processes, political-constitutional systems with formal impeachment mechanisms.	Studies focused on non-impeachment actors without constitutional accountability relevance.
Concept	Impeachment as constitutional accountability, political instrumentalization, or contested hybrid institution. Must substantively engage with impeachment as institutional, legal, political, or democratic phenomenon.	Works where impeachment is incidental, rhetorical, metaphorical, or not a central analytical concept.
Exposure	Initiation, conduct, contestation, and outcomes of impeachment proceedings; constitutional grounds, procedural safeguards, voting thresholds, trial structures, partisan dynamics, coalition behavior.	Studies focused exclusively on non-impeachment removal mechanisms without direct comparative relevance.
Comparator	Accountability-oriented versus politically instrumentalized impeachment; cross-jurisdiction comparison; stronger versus weaker procedural safeguards; high- versus low-polarization contexts.	Studies outside the defined jurisdictional scope without clear analytical transferability.
Study Design	Doctrinal legal scholarship, comparative constitutional analysis, qualitative case studies, empirical political studies, quantitative studies, mixed-method research, systematic evidence syntheses where impeachment is analytically central.	Non-academic or insufficiently grounded materials; studies lacking sufficient methodological, doctrinal, or analytical transparency.
Context	Philippines, United States, France, and Italy.	Studies situated exclusively in other jurisdictions without cross-jurisdictional analytical relevance.
Outcomes	Rule of law, separation of powers, democratic legitimacy, executive accountability, public trust, institutional resilience, constitutional stability, and patterns of partisan or strategic use.	Studies whose findings do not materially relate to the review's central objectives and outcomes.
Language	English-language publications only.	Non-English studies.
Access	Full manuscript accessible.	Studies without accessible full text.

2.4 Study Selection and PRISMA Flow

The search identified 921 records. After removing 150 duplicates, 771 records were screened by title and abstract; 412 were excluded. Of the 359 full-text articles assessed for eligibility, 200 were excluded for reasons including jurisdictional irrelevance, insufficient methodological transparency, and unavailability of full text.

A total of 159 studies were included in the final synthesis. Reference list searching identified no additional studies that met the inclusion criteria. The complete study selection procedure is illustrated in Figure 2.

Selection, screening, and data extraction were carried out by a single reviewer, the author. This deviates from the independent dual-reviewer standard and is disclosed in accordance with PRISMA 2020, which requires reporting the number of reviewers who screened records and whether they worked independently (Page et al., 2021). The deviation arises from the conditions of the study rather than from methodological preference: the review was completed as an individually assessed requirement of the Bachelor of Arts in Political Science program at Davao Oriental State University, in which each student was required to conduct a systematic literature review independently, so no second reviewer was available. To limit the resulting risk of error and bias, the search strategy (Section 2.2), eligibility criteria (Section 2.3), and screening stages (Figure 2) were fixed before screening began and applied uniformly to every record, and the selection process was carried out over approximately seven months. These measures reduce, but do not replace, independent verification. The consequences for the strength of the conclusions are discussed in Section 5.1, and future replications should use two or more independent reviewers with inter-rater agreement reported.

Quality appraisal was conducted with a modified Critical Appraisal Skills Programme (CASP) checklist of 11 items, scored one point per "Yes" response and classified as High (9–11), Moderate (6–8), or Low (0–5); the item-level responses for all included studies are reported in Supplementary File 2. Appraisal was used to describe and weight the evidence, not to exclude studies, for three reasons. First, methodological transparency was already an eligibility criterion (Section 2.3), so studies lacking it were removed at full-text assessment. Second, a substantial share of the corpus consists of doctrinal and constitutional-law scholarship, for which checklists designed for empirical designs capture rigor only partially, and applying a hard score cut-off would systematically exclude legitimate legal-theoretical work. Third, excluding Low-rated studies would remove jurisdictions with thinner literatures, notably the Philippines, and bias the comparison. Studies rated Low are therefore retained and are treated with corresponding caution: thematic conclusions are stated more tentatively where they rest mainly on Low-rated sources, and the appraisal distribution is reported so readers can judge this for themselves.

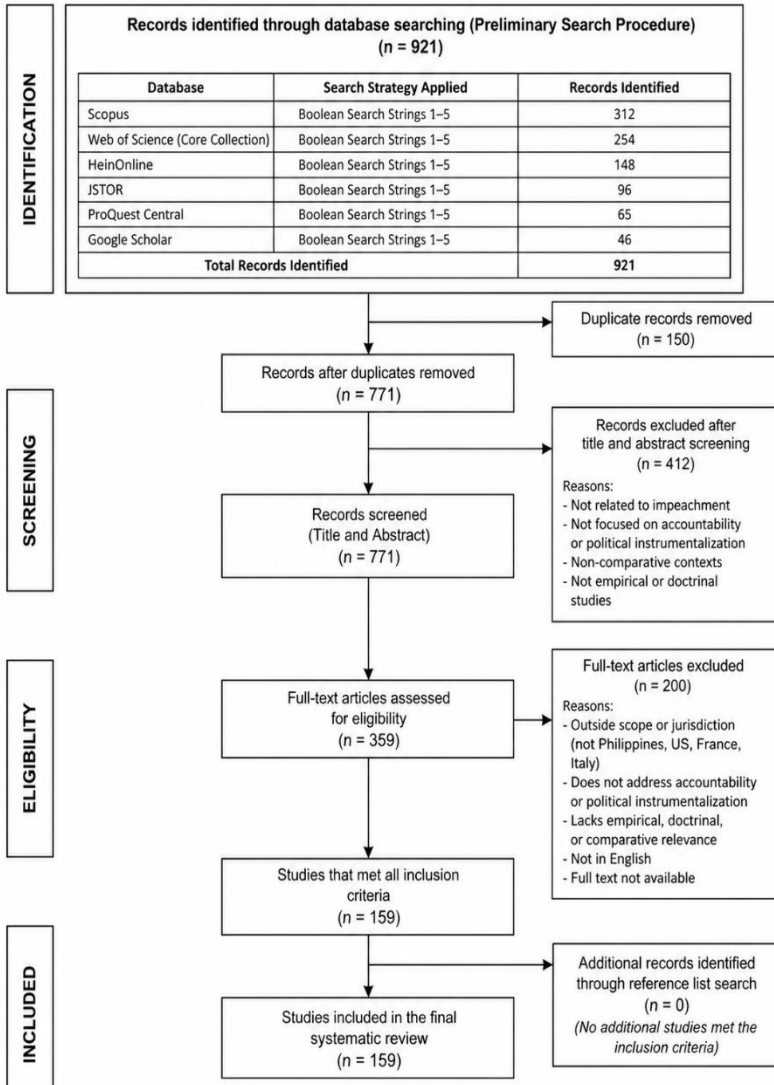


Figure 2. PRISMA Flow Diagram of Study Selection

Note. The PRISMA flow diagram illustrates the full identification, screening, eligibility, and inclusion procedure, from 921 records identified to 159 studies included in the final synthesis

2.5 Data Extraction

Each of the 159 included studies was coded using a standardized extraction template. Variables extracted included: author(s) and year; country or jurisdiction; unit of analysis; conceptual focus; methodological design; data source and evidence base; main findings; accountability or political instrumentalization classification; institutional, legal, and political conditions identified; democratic and governance implications; and quality and rigor notes. The complete extraction matrix is provided as Supplementary Table S1.

2.6 Quality Appraisal

Included studies were assessed for methodological quality using a modified Critical Appraisal Skills Programme (CASP) checklist adapted for mixed legal and empirical literature. The standard CASP checklist was developed for empirical qualitative research; it was adapted here by replacing items that presuppose an explicit primary-data methods section (e.g., recruitment strategy, data collection procedure) with equivalent items assessing argumentative transparency, doctrinal sourcing, and traceability of legal claims to primary authority, so that doctrinal-legal sources are not penalized simply for not reporting an empirical method they were never intended to have. The adapted eleven-item checklist and full scoring rationale are provided in Supplementary File 2. Quality assessment evaluated methodological transparency, scholarly credibility, relevance to impeachment, clarity of evidence, extractability of findings, and contribution to the review questions. Studies received ratings of High (9-11 points), Moderate (6-8 points), or Low (3-5 points). Applying this checklist to all 159 included studies produced 26 High-rated (16.4%), 96 Moderate-rated (60.4%), and 37 Low-rated (23.3%) studies (Supplementary File 2). All 159 were retained in the corpus, but retention was not treated as equivalent to evidentiary weight: no single substantive claim in Sections 3 and 4 is grounded exclusively in a Low-rated study, and Low-rated sources are used only for contextual, background, or illustrative purposes rather than as the sole support for a thematic or comparative conclusion. This distinction is intended to prevent the quality appraisal from becoming a purely reporting exercise, as Low-rated studies were retained where they provided unique doctrinal or jurisdictional contributions not available elsewhere. The full CASP checklist is provided as Supplementary File 2.

2.7 Data Synthesis

Data were synthesized using an integrative thematic approach combining doctrinal legal analysis, empirical political research, and comparative constitutional scholarship. Studies were coded into four analytical dimensions: conceptualizations of impeachment; institutional, legal, and political conditions; patterns of political instrumentalization; and implications for democratic governance. Cross-national

comparisons of the Philippines, the United States, France, and Italy provided the comparative layer for the synthesis. The synthesis produced five thematic categories, organized hierarchically into themes and sub-themes.

3. Results

3.1 Study Selection Results

A total of 159 studies were included in the final synthesis following the PRISMA-guided selection process (see Figure 2). The included body of literature encompassed doctrinal legal scholarship, comparative constitutional analyses, empirical political studies, qualitative case studies, quantitative investigations, and mixed-method works. The selected studies span publication years from 1913 to 2025, reflecting both foundational constitutional scholarship and contemporary analyses of recent impeachment episodes.

3.2 Characteristics of Included Studies

Table 3 summarizes the characteristics of the included studies. The majority of studies were situated within the United States context ($n \approx 105$), reflecting the dominance of U.S.-centered impeachment scholarship in English-language literature. Philippine-focused studies ($n \approx 22$) constituted the second-largest group, followed by comparative studies spanning multiple jurisdictions ($n \approx 20$) and studies focused on France and Italy individually or in a comparative combination ($n \approx 12$). Methodologically, doctrinal and constitutional legal scholarship predominated, followed by empirical political studies and comparative analyses. The complete data extraction matrix is available as Supplementary Table S1.

Table 3. Characteristics of the included studies (selected).

Author(s) & Year	Jurisdiction	Study Design	Main Focus	Classification
Turley (1999)	United States	Doctrinal/Legal	Impeachment as Madisonian device; factional dispute resolution	Constitutional Accountability
Gerhardt (1999, 2000, 2001, 2022)	United States	Doctrinal/Legal	Lessons of impeachment history; perils of presidential impeachment	Mixed
Ginsburg, Huq, & Landau (2020, 2021)	Comparative	Comparative Constitutional	Uses and abuses of presidential impeachment; comparative constitutional law	Mixed
Apelbaum (2025)	United States	Empirical/Historical	How impeachment has been broken; 1974-2024 trajectory	Political Instrumentalization
Dreyer (2022)	United States	Legal-Political	Hyperpartisanship and the unchecked executive branch	Political Instrumentalization
Ohnesorge (2021)	Comparative	Comparative Constitutional	Comparing impeachment regimes across jurisdictions	Mixed
Tokatlı (2024)	Comparative	Comparative Political	Impeachment as last resort; different institutional settings	Mixed
Zaznaev (2020)	Comparative	Political Science	Politicizing presidential impeachment in the contemporary world	Political Instrumentalization
Brown (2024)	Comparative	Comparative Constitutional	Taxonomy of impeachment methods used worldwide	Constitutional Accountability
Galgoczy et al. (2022)	United States	Quantitative/Empirical	Bot activity reshaping online narratives during Trump impeachment	Political Instrumentalization
Cole & Garvey (2015)	United States	Legal/Policy	Constitutional and procedural mechanics of impeachment and removal	Constitutional Accountability
Pérez-Liñán (2018)	Comparative	Comparative Political	Impeachment or backsliding; threats to democracy in 21st century	Mixed

Note. This table presents a representative selection of included studies. The complete data extraction matrix of all 159 included studies is provided as Supplementary Table S1.

3.3 Thematic Categories of the Review

The synthesis produced five thematic categories, each containing multiple themes and sub-themes. Figure 3 presents the complete thematic framework derived from the 159 included studies.

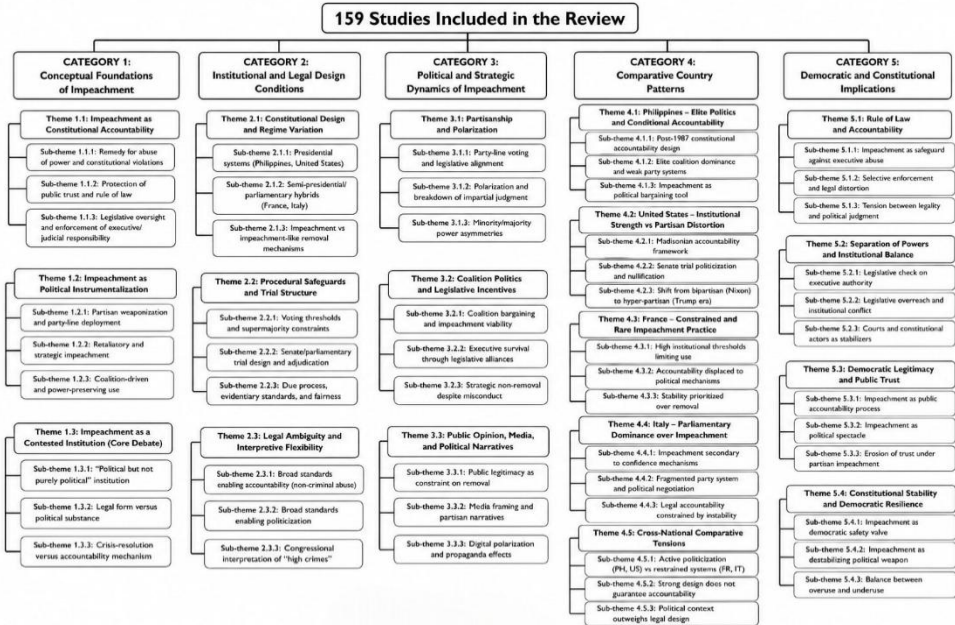


Figure 3. Thematic categories derived from the systematic literature review.

Note. The figure illustrates the five thematic categories and their constituent themes and sub-themes synthesized from 159 included studies.

3.4 Category 1: Conceptual Foundations of Impeachment

Theme 1.1: Impeachment as Constitutional Accountability

The most foundational strand of the literature treats impeachment as a constitutional mechanism designed to enforce public accountability, preserve the rule of law, and constrain abuses of power. This conceptualization is consistent across doctrinal, historical, and normative legal scholarship (Cole & Garvey, 2015; Dougherty, 1913; Gerhardt, 1999; Rotunda, 1988; Turley, 1999). Three primary sub-themes emerge from this category.

Sub-theme 1.1.1 concerns impeachment as a remedy for abuse of power and constitutional violations. The literature emphasizes that impeachment was designed to

address serious abuses of executive or judicial power that could not be adequately remedied through ordinary legal means. Holtzman (2008) argued that impeachment is the constitutionally appropriate remedy for presidential abuses, while Gerhardt (2000) documented the structural underpinnings of this function. Cole and Garvey (2015) provided a comprehensive legal analysis of the constitutional grounds for impeachment, confirming its status as an emergency constitutional remedy.

Sub-theme 1.1.2 concerns the protection of public trust and the rule of law. Turley (1999) argued that impeachment, when properly applied, functions as a Madisonian device to resolve factional disputes and preserve democratic legitimacy. Cohn (2000) emphasized that transparency in Senate deliberations is essential to maintaining the impeachment process's public accountability function.

Sub-theme 1.1.3 concerns legislative oversight and the enforcement of executive and judicial responsibility. Bazan and Rosenberg (2005) and Katyal (2000) documented Congress's role as an accountability institution capable of subjecting executive and judicial officers to constitutional review through impeachment proceedings.

Theme 1.2: Impeachment as Political Instrumentalization

A parallel body of scholarship documents the extensive use of impeachment for partisan, strategic, retaliatory, and coalition-driven purposes. Apfelbaum (2025) traced the deterioration of impeachment from a constitutional safeguard to a political instrument between 1974 and 2024. Dreyer (2022) showed how hyperpartisanship has enabled the use of impeachment to weaken the executive branch for partisan advantage. Zaznaev (2020) demonstrated the globalization of politicized impeachment in contemporary democratic systems.

Sub-theme 1.2.1 documents partisan weaponization and party-line deployment. The literature consistently shows that modern impeachments, particularly in the United States, are often initiated and resolved along strict party lines, with legal standards subordinated to partisan calculations (Apfelbaum, 2025; Broughton, 2017; Dreyer, 2022; Harrington & Waddan, 2023). Sub-theme 1.2.2 concerns retaliatory and strategic impeachment, in which the mechanism is deployed for political leverage or competitive advantage rather than on genuine constitutional grounds (Healy, 2022; Zaznaev, 2020). Sub-theme 1.2.3 captures coalition-driven and power-preserving uses, which are particularly relevant in presidential systems where coalition bargaining shapes whether impeachment proceeds (Hinojosa & Pérez-Liñán, 2006; Tokatli, 2024).

Theme 1.3: Impeachment as a Contested Institution

The literature increasingly conceptualizes impeachment as inherently contested—simultaneously legal and political, neither purely judicial nor wholly partisan. Ginsburg et al. (2021) described impeachment as a mechanism capable of

both protecting democracy and enabling its abuse. Ohnesorge (2021) argued that impeachment occupies a structural position between ordinary politics and constitutional emergency. This contested nature generates persistent debates about the appropriate scope of "high crimes and misdemeanors," the proper role of evidence versus political judgment, and whether impeachment strengthens or destabilizes constitutional systems.

3.5 Category 2: Institutional and Legal Design Conditions

Theme 2.1: Constitutional Design and Regime Variation

Constitutional design fundamentally shapes how impeachment functions. The literature identifies systematic variation across presidential and semi-presidential or parliamentary systems. In presidential systems such as the Philippines and the United States, impeachment is the primary constitutional remedy for executive misconduct because fixed electoral terms prevent ordinary legislative removal (Cole & Garvey, 2015; Ginsburg et al., 2021; Ohnesorge, 2021). In semi-presidential and parliamentary systems such as those of France and Italy, impeachment is institutionally secondary, and accountability operates through other mechanisms, including parliamentary confidence votes, constitutional courts, and political sanctions (Tokatlı, 2024).

Brown (2024) provided a comprehensive taxonomy of impeachment methods across jurisdictions, distinguishing systems by their constitutional grounds, voting thresholds, trial forum, and institutional actors. Ginsburg et al. (2021) showed that regime type significantly determines whether impeachment is used frequently and politically or rarely and constitutionally.

Theme 2.2: Procedural Safeguards and Trial Structure

The literature identifies procedural safeguards as critical determinants of whether impeachment functions as genuine accountability or becomes politically weaponized. Voting thresholds, particularly supermajority requirements in the trial phase, are identified as the most significant structural safeguard against purely partisan removal (Broughton, 2017; Cole & Garvey, 2015; Nourse, 2022). The structure of Senate or parliamentary trials, including the oath of impartiality, procedural rules, and adjudication standards, also affects the integrity of impeachment outcomes (Ratthey, 2021; Tiefer, 1999). Cohn (2000) argued that public deliberation requirements protect the democratic legitimacy of impeachment proceedings.

Theme 2.3: Legal Ambiguity and Interpretive Flexibility

The literature consistently identifies legal ambiguity as a double-edged feature of impeachment design. Broad standards such as "high crimes and misdemeanors" or "betrayal of public trust" enable accountability for non-criminal executive abuses,

which is essential for constitutional governance (Katyal, 2000; McGinnis, 1999). However, the same breadth enables opportunistic political use. Gerhardt (1999, 2001) argued that interpretive flexibility makes impeachment both effective and manipulable. TenBroek (1939) showed historically that partisan politics have shaped judicial impeachment since the early twentieth century, demonstrating the enduring tension between legal standards and political incentives.

3.6 Category 3: Political and Strategic Dynamics of Impeachment

Theme 3.1: Partisanship and Polarization

Partisan polarization emerges as the most consistently identified factor transforming impeachment from a constitutional remedy into a political weapon. Jacobson (2000) demonstrated through quantitative analysis that Clinton's impeachment was driven almost entirely by partisan voting patterns rather than evidentiary assessments. Apfelbaum (2025) documented the progressive deterioration of bipartisan norms from Watergate through the Trump-era impeachments. Dreyer (2022) argued that hyperpartisanship enables the legislative branch to use impeachment as a tool for executive branch destabilization.

The literature shows that polarization affects not only voting outcomes but also the nature of deliberation, the construction of evidence, media framing, and public reception of impeachment proceedings. Harrington and Waddan (2023) argued that modern U.S. impeachment has become rhetorically overused and institutionally under-effective precisely because polarization has eroded the cross-party consensus that gives impeachment its constitutional legitimacy.

Theme 3.2: Coalition Politics and Legislative Incentives

Coalition dynamics play a particularly important role in multi-party and weakly institutionalized systems. Hinojosa and Pérez-Liñán (2006) showed that presidential survival in impeachment processes depends critically on the stability and loyalty of legislative coalitions. De Micheli et al. documented that in multiparty settings, removal outcomes depend on coalition defection, ally incentives, and strategic political repositioning. Tokatlí (2024) framed impeachment as a mechanism of institutionalized mistrust that coalition partners use as leverage in executive-legislative negotiations.

Theme 3.3: Public Opinion, Media, and Political Narratives

Public opinion functions as both a constraint on and a driver of impeachment outcomes. Jacobson (2000) and Kagay (1999) showed that sustained public opposition to Clinton's removal was a critical factor in his survival, demonstrating that public legitimacy can outweigh legislative majorities. Galgoczy et al. (2022) documented

how coordinated bot activity reshaped online narratives during Trump's first impeachment, showing how digital platforms have become tools for impeachment propaganda. Flynn (2024) argued that modern impeachment combines educational, disciplinary, polarizing, and destabilizing effects, with media amplification determining which of these functions dominates public reception.

3.7 Category 4: Comparative Country Patterns

Theme 4.1: Philippines — Elite Politics and Conditional Accountability

Philippine impeachment scholarship consistently reveals a pattern in which the mechanism's accountability function is constrained by elite coalition dynamics, weak party institutionalization, and political bargaining. The 1987 Constitution established a rigorous impeachment framework requiring a one-third vote in the House of Representatives to initiate proceedings and a two-thirds vote in the Senate for conviction (1987 Philippine Constitution, Art. XI, § 3(4), (6)); Holtzman's (2008) U.S.-focused analysis is not cited as authority for this Philippine constitutional provision but is retained elsewhere in this review only for claims about the U.S. impeachment remedy. However, the literature shows that outcomes are heavily shaped by presidential coalition management and elite political networks rather than by evidentiary or constitutional considerations alone. Philippine impeachment thus illustrates a conditional accountability pattern: the mechanism can serve its constitutional function, but it requires political conditions, particularly cross-party coalitions, that are rarely organically present.

Theme 4.2: United States — Institutional Strength versus Partisan Distortion

The U.S. literature presents a paradox of institutional design: the American impeachment framework is constitutionally sophisticated, historically tested, and structurally elaborate, yet it has become increasingly incapable of producing cross-party accountability. Altshuler (2000) and Whittington (1999, 2022) documented the shift from the bipartisan Nixon proceedings to the sharply partisan Clinton and Trump impeachments. Apfelbaum (2025) argued that this trajectory represents a fundamental deterioration of impeachment as a constitutional instrument. The two-thirds Senate threshold prevents reckless removal but cannot compel constitutional judgment when senators act as partisan agents. The critical synthesis is that U.S. impeachment has strong formal safeguards but weak behavioral safeguards.

Theme 4.3: France — Constrained and Rare Impeachment Practice

France functions as a contrast case in which impeachment is constrained by high institutional thresholds and is rarely used. The French semi-presidential system

provides multiple alternative accountability mechanisms, including parliamentary responsibility, constitutional review, and electoral sanction, which reduce the necessity and frequency of formal impeachment. The literature suggests this creates a different accountability logic: rarity signals institutional stability but may also indicate accountability displacement rather than genuine constitutional protection. Ginsburg et al. (2020) argued that France's framework reflects a design preference for stability over routine removal, which protects against weaponization but may leave serious misconduct without credible constitutional remedy when alternative mechanisms fail.

Theme 4.4: Italy — Parliamentary Dominance over Impeachment

Italy demonstrates a model of displaced accountability in which parliamentary responsibility mechanisms—particularly confidence votes and coalition turnover—perform the accountability function that impeachment serves in presidential systems. Tokatlı (2024) showed that in parliamentary systems, formal impeachment is institutionally secondary because political responsibility can be processed through confidence dynamics and cabinet instability. Italy's fragmented party system further shapes this pattern, with accountability emerging through coalition negotiation rather than formal legal judgment. The result is that constitutional accountability may be politically active but legally diffuse, making it less visible and less doctrinally settled than accountability through formal impeachment.

Theme 4.5: Cross-National Comparative Tensions

The comparative analysis reveals three persistent tensions across the four jurisdictions. First, active politicization versus restrained systems: the Philippines and United States show how formal constitutional design cannot immunize impeachment from political degradation, while France and Italy show how restrained systems avoid overuse but risk displacing accountability. Second, strong design does not guarantee accountability: the United States demonstrates that even sophisticated constitutional engineering cannot prevent partisan capture when political norms collapse. Third, political context outweighs legal design: across all four jurisdictions, the literature consistently finds that political conditions, including partisanship, coalition behavior, and democratic norms, exert stronger influence on impeachment outcomes than constitutional text or procedural rules alone (Ginsburg et al., 2021; Ohnesorge, 2021; Zaznaev, 2020).

3.8 Category 5: Democratic and Constitutional Implications

Theme 5.1: Rule of Law and Accountability

Impeachment reinforces the rule of law when it demonstrates that no official is above constitutional constraint (Cole & Garvey, 2015; Gaughan, 2010; Holtzman, 2008). Gerhardt's (1999, 2001, 2022) extensive scholarship has shown that the historical record of impeachment contains both genuine accountability moments and episodes of legal distortion, with selective enforcement undermining the universality of the rule of law. The key tension identified across the literature is between the legality of impeachment as a constitutional remedy and the political character of its application, which inevitably introduces elements of political judgment into what should be a legally grounded process.

Theme 5.2: Separation of Powers

Impeachment is the legislative branch's most powerful check on the executive and judicial branches, and the literature shows it can reinforce or distort separation of powers depending on how it is used. Apfelbaum (2025) and Healy (2022) warned that modern impeachment may become retributive, enabling legislative branches to wage political warfare against the executive under constitutional cover. Gerhardt (1999) documented that imprudent impeachment can damage governance and constitutional balance. Courts play an ambiguous role: Ginsburg et al. (2021) showed that judicial involvement can strengthen impeachment integrity in some systems, while U.S. courts have generally treated impeachment as a nonjusticiable political question, most notably in *Nixon v. United States*, 506 U.S. 224 (1993), where the Supreme Court held that the Senate's conduct of impeachment trials is textually committed to the Senate and lacks judicially manageable standards for review.

Theme 5.3: Democratic Legitimacy and Public Trust

Impeachment affects democratic legitimacy both through its substantive outcomes and through the process by which it is conducted. Turley (1999) argued that transparent, evidence-based impeachment strengthens democratic legitimacy by publicly documenting misconduct and demonstrating institutional responsiveness. Kalt (2022) showed that even failed impeachments can serve important signaling, deterrent, reputational, and disqualification functions. However, Flynn (2024), Harrington and Waddan (2023), and Healy (2022) have shown that impeachment becomes a spectacle when legal claims are subordinated to partisan messaging, shifting public attention from constitutional substance to political performance. Galgoczy et al. (2022) and Othmeni (2020) documented how partisan impeachment

and digital propaganda amplify each other, deepening polarization and eroding public trust in democratic institutions.

Theme 5.4: Constitutional Stability and Democratic Resilience

The literature presents impeachment as simultaneously a constitutional safety valve and a potential destabilizing weapon. Ginsburg et al. (2020) argued that properly designed impeachment resolves deep political crises through constitutional procedure, preventing the false choice between tolerating abuse and resorting to extra-constitutional removal. However, Apelbaum (2025), Zaznaev (2020), and Bloch (2012) warned that routinized, partisan, or retaliatory impeachment normalizes institutional conflict and weakens constitutional resilience. Ohnesorge (2021) identified balance between overuse and underuse as the central challenge for democratic systems. Democracies need impeachment to be available but not routine, credible but not partisan, flexible but not standardless, and political but not lawless.

4. Discussion

4.1 Interpretation by Research Objective

Regarding the first objective, the literature conceptualizes impeachment as a constitutional accountability mechanism, a political instrument, and a contested hybrid institution (Ginsburg et al., 2021; Ohnesorge, 2021; Turley, 1999). This tripartite conceptualization is essential because it rejects binary framings that treat impeachment as either purely legal or purely political (Brown, 2024; Gerhardt, 1999). The contested hybrid character of impeachment means that its meaning, function, and legitimacy are continuously renegotiated in the political process surrounding each proceeding (Hollis-Brusky, 2021; Pérez-Liñán, 2018).

Regarding the second objective, accountability depends on a constellation of conditions: robust procedural safeguards, credible evidentiary standards, supermajority voting thresholds, institutional independence in the trial forum, cross-party deliberation, and the preservation of constitutional norms over partisan loyalty. The comparative evidence shows that no single condition is sufficient on its own; the synthesized literature associates the co-occurrence of these conditions with accountability-oriented outcomes, and this review presents that association as a proposition generated from an integrative thematic synthesis rather than as a causal relationship demonstrated by it (Ginsburg et al., 2021; Ohnesorge, 2021; Rattey, 2021).

Regarding the third objective, political instrumentalization occurs systematically under conditions of partisan polarization, party-line voting, coalition bargaining incentives, retaliatory politics, strategic timing, media amplification, and digital propaganda (Apelbaum, 2025; Dreyer, 2022; Galgoczy et al., 2022; Zaznaev, 2020).

The evidence from the United States and the Philippines shows that instrumentalization is not exceptional; it is a structural risk inherent in impeachment systems that lack sufficient behavioral and institutional safeguards against partisan capture (Harrington & Waddan, 2023; Hinojosa & Pérez-Liñán, 2006).

Regarding the fourth objective, impeachment practices have profound implications for the rule of law, the separation of powers, democratic legitimacy, and constitutional stability (Gerhardt, 2022; Kalt, 2022; Whittington, 2022). Politicized impeachment erodes the rule of law by demonstrating that legal standards are selectively applied (Apelbaum, 2025; Gaughan, 2010). It distorts separation of powers by weaponizing the legislative check (Healy, 2022; Nourse, 2022). It undermines democratic legitimacy by shifting public perception from accountability to partisan spectacle (Flynn, 2024; Harrington & Waddan, 2023). And it threatens constitutional stability by normalizing institutional conflict (Bloch, 2012; Zaznaev, 2020).

4.2 A Proposed Analytical Model: The Impeachment Function Continuum

Drawing on a synthesis of 159 studies, this review proposes an analytical model to describe the conditions under which impeachment shifts between its constitutional and political functions. The Impeachment Function Continuum (IFC) conceptualizes impeachment outcomes as situated along a spectrum between two poles: Constitutional Accountability Pole and Political Instrumentalization Pole.

At the Constitutional Accountability Pole, impeachment is characterized by: (1) evidence-based initiation grounded in documented constitutional violations (Cole & Garvey, 2015; Holtzman, 2008); (2) procedural fairness and due process protection for the accused (Rathey, 2021; Tiefer, 1999); (3) cross-party or supermajority deliberation insulated from pure partisan loyalty (Broughton, 2017; Nourse, 2022); (4) institutional independence in the trial forum (Cohn, 2000; Rathey, 2021); and (5) public transparency enabling civic evaluation of the evidence and proceeding (Turley, 1999). At this pole, impeachment strengthens rule of law, reinforces separation of powers, and enhances democratic legitimacy (Cole & Garvey, 2015; Kalt, 2022).

At the Political Instrumentalization Pole, impeachment is characterized by: (1) partisan initiation driven by electoral or coalition calculations rather than constitutional violations (Apelbaum, 2025; Zaznaev, 2020); (2) procedural manipulation or suppression of evidence (Dreyer, 2022; Healy, 2022); (3) party-line voting with no cross-party deliberation (Broughton, 2017; Jacobson, 2000); (4) capture of the trial forum by partisan majorities (Nourse, 2022; Tiefer, 1999); and (5) media and digital amplification of partisan narratives that subordinate constitutional substance to political spectacle (Flynn, 2024; Galgoczy et al., 2022; Othmeni, 2020). At this pole, impeachment weakens institutional legitimacy, erodes public trust, and destabilizes democratic governance (Ginsburg et al., 2020; Pérez-Liñán, 2018).

Between these poles, the IFC identifies a contested zone where impeachment combines elements of both functions. This contested zone is where most contemporary impeachments are situated, as documented across the comparative evidence from all

four jurisdictions (Ginsburg et al., 2021; Ohnesorge, 2021; Tokatlı, 2024). The model proposes three structural drivers that push impeachment toward one pole or the other: institutional design factors (procedural safeguards, voting thresholds, trial structure; Broughton, 2017; Cole & Garvey, 2015); political environment factors (partisan polarization, coalition stability, democratic norms; Apelbaum, 2025; Hinojosa & Pérez-Liñán, 2006); and information environment factors (media framing, digital propaganda, public deliberation quality; Flynn, 2024; Galgoczy et al., 2022). When institutional design is strong and the political and information environments are healthy, impeachment trends toward the constitutional accountability pole. When institutional design is weak or the political and information environments are distorted by partisanship and propaganda, impeachment trends toward political instrumentalization (Harrington & Waddan, 2023; Zaznaev, 2020).

The IFC contributes to the literature by moving beyond the dichotomous framing of impeachment as either constitutional or political. It provides a structured analytical framework for assessing where any given impeachment episode is situated on the continuum and for identifying which of the three structural drivers requires reform to restore the constitutional function. This model directly addresses the first research objective by synthesizing the literature's conceptualizations into an integrated theoretical framework, and it responds to the fourth objective by operationalizing the democratic implications of impeachment practices.

Figure 4. The impeachment function continuum (IFC): A proposed analytical model.

Constitutional Accountability Pole	Contested Zone	Political Instrumentalization Pole
Evidence-based initiation Procedural fairness Cross-party deliberation Institutional independence Public transparency	Mixed constitutional and political motivations Partial procedural compliance Limited cross-party support Partial institutional independence Mixed information environment	Partisan initiation Procedural manipulation Party-line voting only Trial forum captured by majority Media/digital amplification of partisanship
Outcome: Strengthens rule of law; reinforces separation of powers; enhances democratic legitimacy	Outcome: Ambiguous; depends on specific procedural and political conditions	Outcome: Weakens institutional legitimacy; erodes public trust; destabilizes democratic governance
Structural Drivers		
Institutional Design(procedural safeguards, voting thresholds, trial structure)	Political Environment(partisan polarization, coalition stability, democratic norms)	Information Environment(media framing, digital propaganda, public deliberation quality)

Note. The IFC model is proposed based on the synthesis of 159 included studies. Impeachment episodes can move in either direction depending on changes in the three structural drivers.

4.3 Comparative Implications

This systematic literature review synthesized 159 studies on impeachment across the Philippines, the United States, France, and Italy. The findings carry practical significance: all four countries have experienced impeachment or impeachment-adjacent episodes within the past decade with substantial constitutional consequences (Apelbaum, 2025; Ginsburg et al., 2021). The literature suggests these episodes are not isolated events but are consistent with a structural pattern documented across decades of scholarship (Ohnesorge, 2021; Zaznaev, 2020); this review's contribution is to organize that pattern into a comparative synthesis.

The Philippine Case. Philippine impeachment scholarship frames the February 2025 House impeachment of Vice President Sara Duterte on grounds of graft, corruption, bribery, and betrayal of public trust, and the Supreme Court's subsequent nullification of the proceedings on procedural grounds in July 2025 (Cayabyab, 2025; East Asia Forum, 2025), as consistent with a pattern the literature documents for Philippine impeachment more broadly: outcomes shaped substantially by coalition management and procedural contestation rather than by evidentiary assessment alone (Hinojosa & Pérez-Liñán, 2006; Tokatlı, 2024). Read through the IFC, the case is consistent with movement toward the Political Instrumentalization Pole, in that the proceedings were halted by a procedural ruling rather than resolved on the substance of the allegations. This reading applies the synthesized literature to a contemporary case; it is not an independent assessment of the merits of the underlying charges or of the Supreme Court's ruling, both of which are outside the scope of this review. Consistent with the broader comparative literature on active impeachment systems (Broughton, 2017; Nourse, 2022), strengthening the Senate's institutional independence from coalition management is one direction that literature points toward, though this review does not independently evaluate its feasibility in the Philippine context.

The American Case. Donald Trump's two impeachments — in December 2019 for abuse of power and obstruction of Congress, and in January 2021 for incitement — both ending in acquittal along strict party lines (U.S. House of Representatives, 2019, 2021), are widely discussed in the U.S.-focused literature as illustrating a tension identified across that corpus: strong formal procedural safeguards do not, by themselves, prevent partisan capture once cross-party behavioral norms erode (Apelbaum, 2025; Whittington, 2022). Read through the IFC, this pattern is consistent with movement toward the Political Instrumentalization Pole despite institutionally sophisticated design. The literature's proposed responses cluster around restoring cross-party deliberation norms and strengthening evidentiary standards at the House-initiation stage (Dreyer, 2022; Harrington & Waddan, 2023); this review reports this clustering rather than prescribing a remedy independently.

The French Case. France has not subjected a sitting president to formal impeachment; former President Nicolas Sarkozy's December 2024 corruption conviction instead proceeded through the Court of Cassation (Agence France-Presse,

2024; NPR, 2024) a criminal, The accountability-displacement literature (Ginsburg et al., 2020; Tokatl, 2024) frames this pattern—accountability channeled through judicial rather than impeachment mechanisms—as characteristic of systems with high impeachment thresholds. Because the French and Italian evidence base in this review is comparatively thin (approximately 12 of 159 included studies address France or Italy individually or jointly; see Section 3.2), this reading is offered with lower confidence than the Philippine and U.S. readings above, as an illustration of the accountability-displacement thesis rather than as a freestanding comparative finding. The literature on restrained systems suggests that alternative accountability mechanisms need to remain credible, timely, and insulated from executive influence (Ginsburg et al., 2021), a direction this review reports rather than independently recommends.

The Italian Case. Former Prime Minister Silvio Berlusconi's 2013 tax fraud conviction, following more than a dozen earlier prosecutions (Poggioli, 2013), is discussed in the comparative literature as an example of accountability proceeding through coalition mechanics and judicial processes rather than formal constitutional removal (Tokatl, 2024). As with the French case, this reading draws on a comparatively small share of the included corpus and is offered as illustrative rather than conclusive. The literature's suggested direction for such systems is to strengthen prosecutorial independence and narrow parliamentary immunity (Ginsburg et al., 2021; Ohnesorge, 2021), which this review reports rather than independently evaluates.

The Cross-Cutting Pattern. Across the four jurisdictions, the literature converges on a shared conclusion: no single constitutional design feature is sufficient on its own to secure accountability (Ginsburg et al., 2021; Ohnesorge, 2021). The Impeachment Function Continuum (IFC) proposed in Section 4.2 organizes this convergence around three structural drivers—institutional design, political environment, and information environment—that the literature identifies as jointly, rather than individually, consequential (Apelbaum, 2025; Tokatl, 2024; Zaznaev, 2020). The four cases discussed above are treated in this review as illustrations of the conditions documented in the synthesized literature, not as an independent political or legal analysis of the officials or proceedings involved. Read this way, strengthening procedural safeguards, institutional independence, and cross-party behavioral norms are conditions that the reviewed literature associates with impeachment functioning closer to its constitutional design (Broughton, 2017; Cole & Garvey, 2015; Rattey, 2021); this review reports that association rather than asserting it as demonstrated causation, a distinction addressed further in Section 4.1 and Section 5.1.

4.4 Implications for Constitutional Governance and Recommendations

This review carries several practical implications for constitutional governance. First, procedural safeguards must be strengthened rather than weakened. Evidentiary

standards, due process protections, and supermajority thresholds should be treated as constitutional minimums, not as inconveniences (Broughton, 2017; Cole & Garvey, 2015; Nourse, 2022). Second, institutional independence in the trial forum must be protected. The oath of impartiality, robust procedural rules, and structural insulation of the trial body from pure partisan capture are essential (Cohn, 2000; Rattey, 2021). Third, cross-party deliberation mechanisms should be institutionalized. Whether through formal bipartisan requirements or informal constitutional norms, cross-party engagement provides the legitimacy that unilateral party-line impeachment cannot (Harrington & Waddan, 2023; Turley, 1999).

For active impeachment systems such as those in the Philippines and the United States, reform efforts should focus on preventing over-politicization through strengthening behavioral norms, media literacy, and institutional independence (Apelbaum, 2025; Dreyer, 2022; Healy, 2022). For more restrained systems such as France and Italy, reform should ensure that alternative accountability mechanisms remain credible and effective, preventing accountability displacement from becoming accountability avoidance (Ginsburg et al., 2020; Tokatlı, 2024). Across all systems, civic literacy regarding the distinction between constitutional accountability and political spectacle is essential for preserving public legitimacy as a constraint on partisan abuse (Flynn, 2024; Kagay, 1999).

5. Conclusion

This systematic literature review synthesized 159 studies on impeachment as constitutional accountability and political instrumentalization across the Philippines, the United States, France, and Italy. The review addressed four research objectives concerning the conceptualization of impeachment, the conditions enabling accountability, the circumstances of political instrumentalization, and the implications for democratic governance. The central conclusion is that impeachment is a vital but fragile democratic institution. It can enforce accountability, protect public trust, and preserve constitutional order when supported by robust procedural safeguards, credible evidentiary standards, institutional independence, cross-party deliberation, and strong democratic norms. It becomes dangerous when partisan loyalty, coalition bargaining, elite strategy, media polarization, or retaliatory politics override the constitutional inquiry. This review proposes the Impeachment Function Continuum (IFC) as an analytical model to explain why impeachment varies between its constitutional and political functions. The IFC identifies three structural drivers—institutional design, political environment, and information environment—that the synthesized literature associates with impeachment functioning more closely to its constitutional role when they are jointly favorable; this is presented as a proposition drawn from the synthesis, not as a causal relationship that the review's design can establish. The model contributes to the literature by synthesizing the review's

comparative and disciplinary findings into a coherent analytical framework applicable across constitutional systems.

The comparative evidence from the Philippines, the United States, France, and Italy confirms that no constitutional design is sufficient on its own. Strong formal safeguards, as in the United States, cannot prevent political degradation when behavioral norms collapse. High thresholds, as in France, can prevent overuse but risk displacing accountability. Elite coalition dynamics, as in the Philippines, can capture even well-designed mechanisms. Parliamentary accountability, as in Italy, may be politically active but legally diffuse. Preserving impeachment's legitimacy requires sustained institutional development, political restraint, and democratic norms—not merely constitutional engineering. The question for contemporary democratic governance is not whether impeachment should exist, but whether democracies can maintain the conditions necessary for it to function as its designers intended: as an extraordinary constitutional remedy for extraordinary constitutional violations, not as a routine instrument of partisan conflict.

5.1 Limitations

This review is subject to several limitations. The review is limited to English-language literature, which may underrepresent scholarship in Filipino, French, or Italian. The review focuses on four jurisdictions selected for comparative variation, and findings may not be generalizable to other constitutional systems. Included studies vary significantly in methodology, with doctrinal, empirical, and comparative works not always directly comparable. Some impeachment-related processes differ across constitutional systems, particularly where impeachment-like mechanisms exist alongside other removal tools. The review synthesizes existing scholarship and does not conduct new empirical fieldwork. As a single-author review, independent dual coding for study selection and thematic synthesis could not be established; future replications should employ at least two independent coders to reduce potential selection and coding bias.

A related limitation concerns confirmation bias arising from the review's analytical framework. The five thematic categories in Section 3 and the two poles of the Impeachment Function Continuum in Section 4.2 were specified in advance, drawn from the constitutional-accountability/political-instrumentalization distinction that motivated the review's research objectives; codes corresponding to these categories (e.g., partisan initiation, procedural safeguards, cross-party deliberation) are therefore deductive. Sub-themes describing jurisdiction-specific mechanisms (e.g., coalition-driven use in presidential systems, accountability displacement in parliamentary systems) emerged from the extracted studies themselves during synthesis and are inductive. Because a single reviewer applied the deductive framework while also generating the inductive sub-themes, there is a risk that studies were read to confirm the constitutional-accountability/political-instrumentalization distinction rather than to disconfirm it. This risk is distinct from the single-reviewer selection and coding bias

discussed above and was not separately mitigated by a second coder; it is noted here as a limitation on the strength of the thematic conclusions rather than resolved.

5.2 Future Research Directions

Several directions warrant further investigation. More comparative research is needed on impeachment outside U.S.-centered scholarship, particularly in Asian democracies, Latin America, and emerging democracies. More empirical studies on voting behavior, coalition dynamics, media influence, and public opinion in impeachment proceedings would strengthen the IFC model's empirical grounding. More Philippine-focused research under the 1987 Constitution would address the significant underrepresentation of Philippine scholarship in English-language academic databases. More work comparing impeachment with alternative accountability mechanisms—votes of no confidence, constitutional court review, criminal prosecution, and resignation—would enrich the comparative framework. Finally, more research on digital propaganda and its effects on impeachment narratives is essential given the growing role of coordinated information campaigns in shaping public perception.

Acknowledgment

The authors acknowledge the guidance and support of the faculty of the Bachelor of Arts in Political Science program, Davao Oriental State University, Mati City, Davao Oriental, Philippines, whose mentorship informed the conceptual and methodological direction of this review. The authors also thank the university library and its affiliated databases for facilitating access to the literature synthesized in this study. This research received no external funding; the authors declare that no funding body had any role in the design, analysis, or interpretation of this study.

Conflict of Interest Statement

The authors declare no financial or non-financial conflicts of interest that could influence the conduct, analysis, or reporting of this study.

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Author Contributions: Sedoripa, G. M. and Olandria, A.; Study conceptualization, methodology design, data collection, investigation, resource acquisition, data curation, formal analysis, data validation, visualization, supervision, original manuscript writing, critical review, and manuscript editing. All authors contributed to the research, read and approved the final version of the manuscript, and agreed to be accountable for the integrity and accuracy of the work.