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# **Transparency and Integrity Performance Evaluation: Final Evaluation Report**

**July 2020**

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# **TRANSPARENCY AND INTEGRITY PERFORMANCE EVALUATION**

## **FINAL EVALUATION REPORT**

July 6, 2020

Task Order No. 72052318M00001

### **ABSTRACT**

This evaluation analyzes eight selected activities addressing integrity and transparency to verify their results, identify significant changes, extract lessons learned, and document future challenges. The evaluation team primarily employed a qualitative methodological research design involving two tiers of analysis: a performance assessment of each project based on its goals and targets, and a cross-cutting analysis to address the six evaluation questions that guided this analysis, based on the scope of work provided by USAID. In general, the team found that most activities implemented their interventions and delivered their outcomes. However, the level of effectiveness varied among them, due mainly to external factors, which included a favorable political context, the presence of champions within institutions, and an alignment of priorities among all involved. Moreover, no evidence was found on whether a particular mode of engagement resulted in a higher effectiveness or better results. The evaluated interventions employed different mechanisms that varied case by case, thus not allowing for a generalization of the approaches followed to achieve their desired outcomes. Therefore, recommendations are centered around a larger field of action rather than on specific modalities, such as allocating future resources toward the support of local (subnational) governments and non-governmental institutions, where capacities remain underdeveloped. The team also recommends tailoring specific performance indicators that measure the activities' contribution to their intended ends, supporting activities based on co-design through calls for proposals, supporting multi-stakeholder coalitions, and establishing clear roles and responsibilities from early stages.

### **DISCLAIMER**

The author's views expressed in this publication do not necessarily reflect the views of the United States Agency for International Development or the United States Government.

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**Table 1. Acronyms**

|         |                                                                                                                                                                                                 |
|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ADS     | Automated Directives System                                                                                                                                                                     |
| APIC    | Advancing Policy and Institutional Change                                                                                                                                                       |
| ASEC    | Superior Audit of the State of Coahuila                                                                                                                                                         |
| ASF     | Superior Audit Institution of the Federation                                                                                                                                                    |
| BMA     | Broad Mission Announcement                                                                                                                                                                      |
| BWG     | Business Working Group                                                                                                                                                                          |
| CCE     | Business Coordination Council                                                                                                                                                                   |
| CCINL   | <i>Consejo Cívico de Instituciones de Nuevo León</i> (Civic Council of the Institutions of Nuevo León)                                                                                          |
| CDMX    | <i>Ciudad de México</i> (Mexico City)                                                                                                                                                           |
| CEESP   | <i>Centro de Estudios Económicos del Sector Privado</i> (Center for Research and Teaching in Economics)                                                                                         |
| CHECCHI | Checchi and Company Consulting Inc.                                                                                                                                                             |
| CIDE    | <i>Centro de Investigación y Docencia Económicas, A.C.</i> (Center for Research and Teaching in Economics)                                                                                      |
| CODECH  | <i>Consejo para el Desarrollo Económico del Estado de Chihuahua</i> (Council for Economic Development of the State of Chihuahua)                                                                |
| CONAMER | <i>Comisión Nacional de Mejora Regulatoria</i> (National Commission on Regulatory Improvement)                                                                                                  |
| CONL    | <i>Consejo Nuevo León</i> (Nuevo León Council)                                                                                                                                                  |
| CPC     | <i>Comité de Participación Ciudadana del Sistema Nacional Anticorrupción</i> (Citizen Participation Committee of the National Anti-corruption System)                                           |
| CSO     | Civil Society Organization                                                                                                                                                                      |
| DIF     | <i>Sistema para el Desarrollo Integral de la Familia</i> (Comprehensive Family Development System)                                                                                              |
| DO      | Development Objective (USAID)                                                                                                                                                                   |
| DOF     | <i>Diario Oficial de la Federación</i> (Official Gazette of the Federation)                                                                                                                     |
| EDCA MX | <i>Estándar de Datos de Contrataciones Abiertas para México</i> (Standard for Open Contracting Data for Mexico)                                                                                 |
| EQ      | <i>Evaluation Questions</i>                                                                                                                                                                     |
| FICOSEC | <i>Fideicomiso para la Competitividad y Seguridad Ciudadana</i> (Trust for Competitiveness and Citizen Security)                                                                                |
| GDA     | Global Development Alliance                                                                                                                                                                     |
| GOM     | <i>Gobierno de México</i> (Government of Mexico)                                                                                                                                                |
| GPSA    | Global Partnership for Social Accountability                                                                                                                                                    |
| ICIFIEP | <i>Índice Ciudadano de Fortaleza Institucional para la Ética Pública</i> (Citizen Index for Institutional Public Ethics Strengthening)                                                          |
| ICMA    | International City/County Management Association                                                                                                                                                |
| ICME    | Integration, Collaboration, Monitoring, and Evaluation                                                                                                                                          |
| IMCO    | <i>Instituto Mexicano para la Competitividad A.C.</i> (Mexican Institute for Competitiveness)                                                                                                   |
| INAI    | <i>Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales</i> (National Institute for Transparency, Access to Information, and Personal Data Protection) |
| IP      | Implementing Partner                                                                                                                                                                            |

|        |                                                                                                                                                                 |
|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ADS    | Automated Directives System                                                                                                                                     |
| IPRO   | <i>Iniciativa para el Fortalecimiento de la Institucionalidad de los Programas Sociales</i> (Initiative for the Institutional Strengthening of Social Programs) |
| IR     | Intermediate Result (USAID)                                                                                                                                     |
| ITESO  | <i>Instituto Tecnológico y de Estudios Superiores de Occidente</i> (Institute of Higher Technology and Studies of the West)                                     |
| LSF    | Local Systems Framework                                                                                                                                         |
| LTS    | Local Technical Secretariat                                                                                                                                     |
| MEPP   | Mexico Economic Policy Program                                                                                                                                  |
| MPA    | <i>Secretaría de la Función Pública</i> (Ministry of Public Administration)                                                                                     |
| MSC    | Most Significant Change                                                                                                                                         |
| NGO    | Non-Governmental Organization                                                                                                                                   |
| OCDS   | Open Contracting Data Standard                                                                                                                                  |
| OECD   | Organization for Economic Cooperation and Development                                                                                                           |
| OIT    | Office of Integrity and Transparency                                                                                                                            |
| ONMR   | <i>Observatorio Nacional de Mejora Regulatoria</i> (National Observatory for Regulatory Improvement)                                                            |
| PDN    | <i>Plataforma Digital Nacional</i> (National Digital Platform)                                                                                                  |
| PEC    | Public Ethics Consolidation Program                                                                                                                             |
| PEMEX  | <i>Petróleos Mexicanos</i> (Mexican Petroleum Company)                                                                                                          |
| PIO    | Public International Organization                                                                                                                               |
| SAADD  | Anonymous Help System for Questions and Complaints                                                                                                              |
| SEA    | State Anti-corruption System                                                                                                                                    |
| SEDATU | <i>Secretaría de Desarrollo Agrario, Territorial y Urbano</i> (Ministry of Agrarian, Territorial, and Urban Development)                                        |
| SEDE   | Ethical Decision Exercises System                                                                                                                               |
| SESNA  | <i>Secretaría Ejecutiva del Sistema Nacional Anticorrupción</i> (Secretariat of the National Anti-Corruption System)                                            |
| SICS   | Social Accountability Computer System 3.0                                                                                                                       |
| SHCP   | <i>Secretaría de Hacienda y Crédito Público</i> (Ministry of Finance)                                                                                           |
| SHH    | <i>Soy Honesto Hoy</i>                                                                                                                                          |
| SNA    | <i>Sistema Nacional Anticorrupción</i> (National Anti-Corruption System)                                                                                        |
| SOW    | Scope of Work                                                                                                                                                   |
| TRRP   | Transparency Rapid Response Program                                                                                                                             |
| UNDP   | United Nations Development Program                                                                                                                              |
| UNODC  | United Nations Office on Drugs and Crime                                                                                                                        |
| USAID  | United States Agency for International Development                                                                                                              |
| USG    | United States Government                                                                                                                                        |

## EXECUTIVE SUMMARY

This evaluation reviews eight integrity and transparency activities to verify their results, identify significant changes, extract lessons learned, and document future challenges. This review is designed to help the United States Agency for International Development (USAID) Mission plan future programming in Mexico and will serve to report to the U.S. State Department's Bureau of International Narcotics and Law Enforcement Affairs on USAID implementation with DOS funding.

The evaluation reviewed the following activities:<sup>1</sup>

- Technical Assistance to Transparency & Anti-Corruption Laws/Systems (Transparency Rapid Response Program, (TRRP))
- Increased Transparency Through Informed Civic Participation in Local Government
- Mapping Corruption: Network Analysis from Budget Allocation to School Services
- Alliance for Integrity in Mexico
- Program Contribution to the World Bank Global Partnership for Social Accountability Multi-Donor Trust Fund
- Mexico Economic Policy Program (MEPP)
- Soy Honesto Hoy
- Public Ethics Consolidation Program

## FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS

Six main evaluation questions (EQs), based on the statement of work provided by USAID, guided this evaluation, and provided the structure of the findings, conclusions, and recommendations offered in this report. The evaluation team primarily employed a qualitative methodological research design involving two tiers of analysis: a performance assessment of each project based on its goals and targets, and a cross-cutting analysis to address the EQs. The Integration, Collaboration, Monitoring, and Evaluation (ICME) evaluation team selected Most Significant Change (MSC), a qualitative evaluation method focused on program improvement, as the core methodology to guide data collection and analysis.

Given that the sample consists of eight different activities, conclusions and recommendations are oriented toward general aspects of the interventions, as well as the role exerted by USAID and the implementing partners (IPs). In addition, findings are heavily weighted towards the significance of external factors because they were revealed to be one of the most important determinants of an intervention's success.

A summary of the most relevant findings, conclusions, and recommendations for each EQ is presented here. For more specific details, please consult the full report.

### EQ 1a. How effective is USAID's approach for promoting anti-corruption reforms?

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<sup>1</sup> As defined in ADS Chapter 201, an activity carries out an intervention or set of interventions, typically through a contract, grant, or agreement with another U.S. Government agency or with the partner country government. An activity also may be an intervention undertaken directly by Mission staff that contributes to a project, such as a policy dialogue. In most cases, multiple interventions are needed to ensure the synergistic contributions necessary to achieve the activities' desired results.

In general, most of the interventions under the activities achieved their proposed targets. The evaluation team identified 68 indicators and their corresponding targets across the evaluated activities.<sup>2</sup> Of those, 56 percent surpassed their targets; 18 percent met between 75 percent and 99 percent of their target; three percent met between 50 percent and 74 percent of their target; seven percent are in a low level of achievement and the indicators met between 25 percent and 49 percent of their target; and 16 percent did not meet or achieved less than 25 percent of their target.

Furthermore, the activities and their interventions demonstrated varying degrees of effectiveness in different areas. Three interventions were particularly effective in developing the capacities of their beneficiaries to advance reforms (the United Nations Development Programme's [UNDP's] online integrity and conflict of interest pilot course, Mexico Economic Policy Program's [MEPP's] Data Journalism, and UNDP's business integrity program). Another four developed platforms and tools to support anti-corruption efforts (World Bank's Open Data Contracting Standard, IMCO's Corruption Index, MEPP's National Observatory for Regulatory Improvement, and MEPP's PEMEX [Petróleos Mexicanos] Code of Conduct). Five furthered civic-government collaborations: UNDP's Co-responsibility Fund, TRRP's 100-Day Anti-corruption Challenge, International City Management Association, Mexico and Latin America's [ICMA's] collaborative strategy, World Bank's participatory budget, and Consejo Cívico de Instituciones de Nuevo León's [Civic Council of the Institutions of Nuevo León [CCINL] *Soy Honesto Hoy* campaign. Different factors contributed to these interventions' effectiveness, such as the expertise and experience of the IP, the effective use of USAID's convening authority, the existence of a champion within institutions, or having an adequate design that integrated counterparts and beneficiaries from early stages. The rest of the interventions were partially effective (eight) or ineffective (two) in meeting their stated targets in these same areas and/or in their degree of application and institutionalization. Among the main factors that affected their effectiveness were the presence of adverse political conditions, changes in priorities at the federal or state levels, or a lack of flexibility to adapt to unforeseen circumstances.

In this aspect, the evaluation team recommends tailoring the activities to the local context, needs, and priorities, making sure to involve working partners from early stages. It is also important to provide reasonable flexibility—especially at the intervention level—because that allows for a better response when unforeseen circumstances and emerging demands arise. Finally, USAID should make use of its convening authority to create communities of practice and thematic networks, engaging public officials who could become champions in specific interventions.

#### **EQ 1b. What external constraints, if any, have impacted USAID's engagement on this issue?**

External constraints were found to have a significant impact—whether positive or negative—on the effectiveness of the eight activities, as stated in the previous EQ. The most relevant were the existence of a champion within institutions, changes in counterparts' priorities, local political conditions, and the institutional capacities of public entities. All these factors proved to be important enablers when conditions were favorable, or meaningful obstacles if the contrary was true.

The evaluation team recommends supporting multi-stakeholder coalitions in order to create a demanding environment that pushes reforms and prevents backsliding, as well as investing in creating communities of practice to engage public officials or key civil society members that can become institutional champions. Moreover, it is important to continually assess critical benchmarks that can help IPs identify

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<sup>2</sup> Two activities (World Bank and IMCO – Alliance for Integrity) are not included in this count because the evaluation team did not find specific information on indicators. For one activity (Public Ethics Consolidation Program – International City Management Association, Mexico and Latin America ICMA) only two indicators are included (out of 9) because, at the time of the evaluation, there was incomplete information on the progress and targets of the remaining indicators.

warning signs and adjust their strategies on time. Providing reasonable flexibility is encouraged, because it allows better adjustment to external and unforeseen circumstances.

**EQ 2a. How well does external pressure from civil society organizations (CSOs), media outlets, and citizen participation improve accountability and transparency?**

The evaluation team defined external pressure as the absence of involvement from the targeted public counterpart affected by the intervention, regardless of whether a public institution participated in the implementation. In other words, these are cases where the IP did not associate or work together with the political institution in which changes were expected to be a result of the intervention. Out of the eight assessed activities, three matched this definition: MEPP's Capacity Development for Journalists, MEPP's National Regulatory Improvement Observatory (ONMR), and CCINL's *Soy Honesto Hoy* (SHH).

All three activities that involved external pressure proved to be effective in meeting their stated goals, though their outcomes are oriented to performance-related targets rather than to an advance of transparency and accountability. This means that, even if these activities managed to achieve their expected goals in the end, it was not possible to establish a clear relationship between the expected/achieved outcomes and improvements in transparency, accountability, and integrity. It is also important to note that these three activities acted upon different dimensions of these issues. Capacity Development for Journalists, for example, never collaborated directly with federal or local governments, and instead focused on improving researchers' capabilities. In contrast, the Observatory pushed local governments directly for compliance with a set of strict guidelines. The SHH campaign pressured candidates and public officials into publicly adhering to a set of anti-corruption commitments while at the same time promoting the adoption of an electronic platform for reporting corruption acts.

The evaluation team advises tailoring specific performance indicators that measure the activities' contribution to the advance of accountability and transparency. Metrics should at least estimate the contribution of the interventions to specific changes related to these issues. Moreover, because it was shown that different forms of external pressure can be successful in advancing activity goals and are potentially complementary, the evaluation team recommends continued support of a wide set of interventions with different approaches, taking advantage of their potential mutual reinforcement at the regional or local levels.

**EQ 2b. How effective or efficient is external pressure compared to internal reforms within judicial and political institutions?**

The evaluated activities employed external pressure and internal reform mechanisms that varied case by case, with some presenting high effectiveness, and some with moderate, little, or no effectiveness. Focusing on either internal reform or external pressure alone does not appear to be the key variable explaining effectiveness. In fact, the evaluation team found that IPs and counterparts took advantage of the window of opportunity that political timing opened in order to achieve higher effectiveness, especially in the case of interventions that had counterparts with decision-making power and political clout.

Considering this, the evaluation team recommends integrating counterpart/stakeholders with decision-making power and/or political clout in the design/implementation phase. Doing so will allow moving forward with the implementation process, act as an effectiveness catalyzer, and increase project ownership. Again, the team recommends providing reasonable flexibility at the intervention level to meet target group needs and deal with unexpected circumstances.

### **EQ 3a. How can international donors best support local<sup>3</sup> reform efforts?**

Informants consulted for this evaluation were directly asked to provide a set of recommendations regarding the priorities for future donor efforts to advance transparency and fight corruption given the new priorities of the federal government and its negative attitudes toward CSOs and past administrations' anti-corruption strategies.

Most recommendations (48 percent) offered by informants concentrated on fostering capacity development activities at the subnational level. Given the disparities in capacities at the local and federal levels, international donors could be more effective in advancing anti-corruption efforts if they invested in developing state and non-state stakeholder capacities. Thus, the evaluation team recommends redirecting future efforts toward the capacity development of civil society and local officials at the subnational institutions and prioritizing reducing the gap in capacities between subnational and national stakeholders.

### **EQ 3b. What specific modalities of engagement have yielded results in advancing state and national anti-corruption systems?**

Based on document sources and information from implementers, the evaluation team concluded that the success or effectiveness of the studied interventions cannot be tied to a specific modality of engagement. Instead, effectiveness is closely tied to external factors, such as political timing or the presence of champions. However, implementers strongly valued cooperation and even co-creation from the early stages of an activity. According to IPs, bringing different perspectives together contributed significantly to robust activity design.

Therefore, the evaluation team recommends continued focus on co-designing activities and establishment of clear roles and responsibilities in the early stages. Networks that include non-governmental stakeholders—CSOs and the private sector—are essential for the activities' sustainability. Multi-stakeholder coalitions can be created by defining a local partnership model for local interventions, which can pressure decision-makers and can help assess the performance of activities

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<sup>3</sup> In this context, "local" refers to country-level (both national and subnational). In other cases throughout the text, "local" means subnational.

## INTRODUCTION

The United States Agency for International Development (USAID) commissioned an evaluation team from International Business & Technical Consultants, Inc. (IBTCI) to review eight USAID integrity and transparency activities in Mexico implemented 2016 to 2019. This document presents the findings, conclusions, and recommendations of the Transparency and Integrity Performance Evaluation.

Mexico has been lagging among Organization for Economic Cooperation and Development (OECD) countries in the conventional measures of corruption. For instance, from 2015 to 2018, the country's scores in Transparency International's Corruption Perception Index worsened, as they fell from 35 to 29 points, standing below Chile, Uruguay, Brazil, and El Salvador (<https://www.tm.org.mx/ipc2019/>). Nine out of 10 Mexicans consider corruption as a “severe problem” (Transparency International, 2019). In 2015, the fight against corruption at all levels of government made a significant step forward with the introduction of a major constitutional amendment that reformed 14 articles of the Constitution to create a National Anti-Corruption System (SNA). The SNA oversees the creation, articulation, and evaluation of anti-corruption policy and coordinates the offices responsible for preventing, investigating, and penalizing administrative offenses and acts of corruption at the national level. In addition, the General Congress of the United Mexican States significantly modified the Federal Penal Code primarily in terms of penalties and fines for public officials and created the General Law of Administrative Responsibilities to replace preexisting laws and thus bring legislation under the new system.

Citizen engagement is an important aspect and a central strategy to combat corruption within the new system and is institutionalized through the creation of the Citizen Participation Committee (CPC). The CPC presides over the Coordinating Committee, the highest authority within the SNA (see Annex VI for a more detailed summary of the structure of the SNA).

The amendment also mandated the creation of a National Digital Platform (PDN) and a National Anti-Corruption Policy. The platform—currently under construction—will connect electronic systems that provide data about procurement processes, conflict of interest declarations, and information on public servants sanctioned for acts of corruption from federal, state, and local government institutions. Upon approval the National Anti-Corruption Policy will provide guidelines to address corruption at all three levels of government. The amendment also increased and strengthened the powers of the Federal Auditing Bureau. The publication of seven secondary laws in 2016 completed the SNA's regulatory framework. Four of those laws were new, and three amended already existing laws.

After more than two years in operation, results were not as expected, because the Platform and the Anti-Corruption Policy are pending approval. Moreover, the Special Anti-corruption Prosecutor was appointed two years after the installation of the Coordinating Committee, the highest authority within the SNA, a delay hindering its work. New challenges are now surfacing with the recent change in the federal administration following the 2018 elections. President Andrés Manuel López Obrador's government, though focused on ending corruption, has questioned the work of several institutions, including the National Institute for Transparency, Access to Information and Personal Data Protection (INAI), the CPC, and CSOs involved in promoting transparency and accountability. These actions have created uncertainty about the future of SNA.

However, prosecution of some high-profile corruption cases has started, such as the case of the officials involved in the *Estafa Maestra*, a scandal regarding the misuse of public funds that involved several federal institutions from the previous administration. Still, doubts persist regarding possible political bias in the selection of the cases prosecuted.

This report begins with an executive summary followed by this introduction. The next section presents the scope and purpose of the evaluation, and then a brief background. This is followed by a description of

the evaluation methodology and its limitations. The final section contains a performance assessment for each project, followed by a cross-cutting analysis related to the EQs. This last section presents findings, conclusions, and recommendations for each EQ.

## **EVALUATION PURPOSE AND EVALUATION QUESTIONS**

### **EVALUATION PURPOSE**

The purpose of this Performance Evaluation is to conduct a retrospective analysis of multiple interventions around anti-corruption in order to verify results, extract lessons learned and best practices, and document challenges. This includes an assessment of the performance of various implementing partners and implementation modalities. Findings will inform USAID/ Mexico's Office of Integrity and Transparency (OIT) to plan future programming. In addition, the evaluation provides an overview of USAID's implementation of \$20 million of funding from the State Department's Bureau of International Narcotics and Law Enforcement Affairs (INL).

### **EVALUATION QUESTIONS**

The statement of work (SOW) provided by USAID (see Annex I) lists the questions to be answered by this evaluation:

- 1a. How effective is USAID's approach for promoting anti-corruption reforms?*
- 1b. What external constraints, if any, have impacted USAID's engagement on this issue?*
- 2a. How well does external pressure from civil society organizations (CSOs), media outlets, and citizen participation improve accountability and transparency?*
- 2b. How effective or efficient is external pressure compared to internal reforms<sup>4</sup> within judicial and political institutions?*
- 3a. How can international donors best support local reform efforts?*
- 3b. What specific modalities of engagement have yielded results in advancing state and national anti-corruption systems?*

To the fullest extent possible, this report integrates the numerous themes and sub-questions under each of these main elements.

### **EVALUATED ACTIVITIES**

This subsection contains a brief description of the activities evaluated.<sup>5</sup> Annex V provides more details on their goals, theories of change, targets, interventions, implementation challenges and performance.

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<sup>4</sup> Internal reforms are understood as changes promoted by public officials to transform their own institution or government-wide processes. External pressure refers to interventions performed by a third party, whether a public body, a CSO, a research institution, or other, aimed at influencing decisions and behaviors of another actor.

<sup>5</sup> As defined in ADS Chapter 201, an activity carries out an intervention or set of interventions, typically through a contract, grant, or agreement with another U.S. Government agency or with the partner country's government. An activity also may be an intervention undertaken directly by Mission staff that contributes to a project, such as a policy dialogue. In most cases, multiple interventions are needed to ensure the synergistic contributions necessary to achieve the activity's desired results.

**Table 2. General Activities Description**

| Activity                                                                                                                   | Implementing Partner                                                       | Type of Agreement                                                           | Dates              | Total Estimated Cost (TEC) |
|----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------|--------------------|----------------------------|
| <b>Technical Assistance to Transparency &amp; Anti-Corruption Laws/Systems (Transparency Rapid Response Program, TRRP)</b> | Checchi and Company Consulting                                             | Contract                                                                    | 10/2016 to 09/2021 | USD \$6,753,500            |
| <b>Increased Transparency Through Informed Civic Participation in Local Government</b>                                     | United Nations Development Programme (UNDP)                                | Public International Organizations (PIO)<br>Cooperative Agreement under BMA | 10/2016 to 09/2019 | USD \$2,800,000            |
| <b>Mapping Corruption: Network Analysis from Budget Allocation to School Services</b>                                      | Instituto Mexicano para la Competitividad (IMCO)                           | Cooperative Agreement under BMA                                             | 10/2016 to 03/2021 | USD \$602,000              |
| <b>Alliance for Integrity in Mexico</b>                                                                                    | Instituto Mexicano para la Competitividad                                  | Cooperative Agreement under Global Development Alliance (GDA)               | 09/2017 to 09/2022 | USD \$1,575,000            |
| <b>Program Contribution to the World Bank Global Partnership for Social Accountability Multi-Donor Trust Fund</b>          | World Bank                                                                 | PIO Grant                                                                   | 04/2016 to 01/2020 | USD \$2,700,000            |
| <b>Mexico Economic Policy Program (MEPP)</b>                                                                               | Abt Associates                                                             | Contract (Already ongoing when OIT emerged)                                 | 04/2016 to 04/2019 | USD \$4,750,000            |
| <b><i>Soy Honesto Hoy</i></b>                                                                                              | Consejo Cívico de las Instituciones de Nuevo León                          | Cooperative Agreement under BMA                                             | 10/2017 to 04/2019 | USD \$980,000              |
| <b>Public Ethics Consolidation Program</b>                                                                                 | International City Management Association, Mexico and Latin America (ICMA) | Cooperative Agreement under BMA                                             | 09/2017 to 09/2019 | USD \$1,650,000            |

## EVALUATION METHODS AND LIMITATIONS

The methodology used in this evaluation was mainly qualitative and involved two tiers of analysis: performance evaluation of each activity and a cross-cutting analysis relating to the EQs and sub-questions. The ICME evaluation team selected Most Significant Change (MSC) as the core methodology to guide data collection and analysis, which is a qualitative evaluation method focused on program improvement. Rather than selecting predetermined indicators, MSC encourages informants to identify

significant activity outcomes (positive and negative, expected, and unexpected) and alternative causes, allowing capture of a wide array of results attributable to an activity.

The evaluation team also assessed the design of each activity, reviewing the clarity of objectives and theories of change, among other aspects. Lastly, to better address EQ 3, the team conducted a prospective analysis, generating plausible scenarios to develop specific strategies with a better probability of effectiveness in promoting anti-corruption reforms in the future (see Annex II for more information on evaluation methods and limitations).

The team compiled the key informant list based on suggestions from USAID, ICME, and IPs, as well as snowballing from contacts suggested by informants at an earlier stage of the fieldwork. USAID approved the final list. Also, the saturation principle was followed. Interviews included informants in Mexico City and Coahuila, Chihuahua, Sonora, and Nuevo Leon—states identified in the SOW. Desk review and fieldwork activities took place from July to October 2019, including visits to the states. The team split into two sub-teams from August 20 to September 3, 2019.

In total, the team reviewed 154 documents, conducted 122 interviews, and held two workshops with 40 participants from the GOM (see Annex III for the data collection instruments used).<sup>6</sup>

The main limitations of the evaluation are as follows:

1. Available documentation differed significantly by activity and interventions, affecting the level of analysis.
2. Particularly for IMCO's Alliance for Integrity activity, conclusions are limited because most of the work is in its early stages, and no intermediate deliverables were available to determine progress.
3. The ICME team intended to broaden the list of current GOM officials to conduct interviews and to inquire into their perspectives on current needs but received no response. As a result, the ICME team had to rely mostly on public sources.
4. As established in the SOW, this is a performance evaluation; hence, the team did not evaluate the impact of these activities.
5. Given the size of the sample and the diversity of the activities, all findings and conclusions stated in this document concern only the eight activities evaluated and should not be generalized. Findings and conclusions only apply to those aspects that are like the set of cases analyzed in this study.

## **FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS**

Six main EQs from USAID's statement of work guided this evaluation. The team then structured findings, conclusions, and recommendations and presented them as answers to the EQs.

### **EQ 1A. HOW EFFECTIVE IS USAID'S APPROACH TO PROMOTING ANTI-CORRUPTION REFORMS?**

This section reports on the level of USAID program effectiveness, as well as the most significant changes identified by key informants. Activities differ in effectiveness according to their capacity to deliver the expected outputs and meet stated targets, and to their degree of application or institutionalization. The

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<sup>6</sup> The information collected through interviews is referenced with a number preceded with the letter "C" (for "code").

ICME Evaluation team divided interventions<sup>7</sup> into three levels: effective, partially effective, and not effective.<sup>8</sup>

## FINDINGS

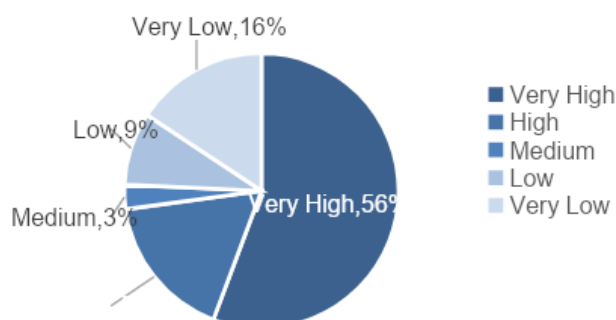
*Finding 1a.1 – Most activities implemented their intended interventions and achieved their proposed targets.*

The evaluation team identified 68 indicators and their corresponding targets across the evaluated activities.<sup>9</sup> Two activities (World Bank and IMCO – Alliance for Integrity) are not included in this count because the evaluation team did not find specific information on indicators. For one activity (Public Ethics Consolidation Program – International City Management Association, Mexico, and Latin America ICMA), only two indicators are included (out of nine) because, at the moment of the evaluation, there was incomplete information on the progress and targets of the remaining indicators.

Each target was classified according to the level of achievement, as follows:

1. Very high: The indicator met 100 percent or more of its stated target. Across the evaluated activities, 56 percent of the targets were met or exceeded.
2. High: The indicator met 75 percent to 99 percent of its stated target. Across the evaluated activities, 18 percent of the targets are classified in a high level of achievement.
3. Medium: The indicator met 50 percent to 74 percent of its stated target. Across the evaluated activities, 3 percent of the targets are classified in a medium level of achievement.
4. Low: The indicator met 25 percent to 49 percent of its stated target. Across the evaluated activities, 7 percent of the targets are classified in a low level of achievement.
5. Very low: The indicator was not met or met below 25 percent of its stated target. Across the evaluated activities, 16 percent of the targets achieved less than 25 percent of their target.

**Figure 1. Benchmark met by level of achievement across evaluated activities**



<sup>7</sup> As defined in ADS Chapter 201, an activity carries out an intervention or set of interventions, typically through a contract, grant, or agreement with another U.S. Government agency or with the partner country government. An activity also may be an intervention undertaken directly by Mission staff that contributes to a project, such as a policy dialogue. In most cases, multiple interventions are needed to ensure the synergistic contributions necessary to achieve the activity's desired results.

<sup>8</sup> IMCO's Alliance for Integrity is not included in this section because no intervention has been fully implemented and there are no intermediate deliverables from which to draw conclusions.

<sup>9</sup> To maintain simplicity and clarity, all types of indicators – output, performance, gender-sensitive, and outcome indicators – were considered and counted without making any distinction among them. See Annex V. Case Studies for a review on each activity's benchmark meet.

In terms of effectiveness, the evaluation team divided interventions into three levels—effective, partially effective, and not effective—according to their capacity to deliver the expected outputs and meet stated targets, and to their degree of application or institutionalization:

1. Fifteen interventions were particularly effective in the following areas:
  - a. Developing the capacities of their beneficiaries (three interventions)
  - b. Developing platforms and tools to support their beneficiaries’ anti-corruption efforts (four interventions)
  - c. Building civic–government collaboration (five interventions)
  - d. Building networks among stakeholders (three interventions)
2. Eight interventions were partially effective in the following areas:
  - a. Developing the capacities of their beneficiaries (four interventions)
  - b. Developing platforms and tools to support their beneficiaries’ anti-corruption efforts (four interventions)
3. Two interventions were not effective, did not meet their stated targets, and were not institutionalized.

## EFFECTIVE INTERVENTIONS

### *Capacity Development*

*Finding 1a.2 – The following three interventions were particularly effective in developing the capacities of their beneficiaries:*

1. UNDP’s online integrity and conflict of interest pilot course directed at the Ministry of Public Administration
2. UNDP’s business integrity program directed at small and medium-sized enterprises (SMEs)
3. MEPP’s Data Journalism intervention directed at journalists and researchers

*Finding 1a.3 – Among the effective interventions, the following four factors contributed to developing the capacities of target beneficiaries:*

1. The expertise of the IP and their allies
2. Adequately tailoring the activity to the beneficiaries’ needs
3. Maintaining flexibility during the implementation process to adapt to unforeseen changes
4. Making effective use of USAID and IP’s convening authority

UNDP effectively implemented an online integrity and conflict of interest pilot course with the Ministry of Public Administration (MPA). The pilot had 62 participants, 58 of whom completed the course, exceeding the target of 50 (UNDP, 2018). As of August 2019, 500 federal employees had completed the course. Even though it is early to attribute institutional changes, the MPA expressed interest in replicating it with all federal public sector employees (UNDP, 2019a; C39). Despite changes in the MPA leadership, the activity’s flexibility enabled UNDP to reestablish relations and align the course to the new government’s priorities (UNDP, 2018; UNDP, 2019a; C39).

MEPP’s Data Journalism intervention, implemented by Data Cívica, trained 283 journalists and researchers. This exceeded the target of 150 and led to relevant investigations on the use of public resources. Several of the investigations won national awards and were published in the front pages of national newspapers such as *Reforma* and *El Universal*. Several journalists and researchers remain involved in important long-term investigative work (C73, C119).

Two of the most notable works of MEPP-trained journalists are the *Estafa Maestra* and *Detrás de los Comités Locales de Abastecimiento y Producción (CLAP)*. Publicity on these cases resulted in formal

charges of corruption and legal procedures against high-level officials that were in progress as of October 2019. The activity also organized journalists, researchers, and media networks, which might further their interventions and sustainability. Finally, the network of working partners with which Abt Associates collaborated (in this case, Data Cívica) was a crucial aspect for its effectiveness. The intervention might have further results because Data Cívica managed to get more resources through other organizations, including Oxfam (C73, C91).

UNDP conducted the business integrity program effectively and created a Business Working Group (BWG) comprising more than 20 companies and Chamber of Commerce representatives, including participation from the United Nations Office on Drugs and Crime (UNODC) and MPA. The BWG oversaw and produced course materials — mainly codes of conduct and ethics for SMEs—which allowed UNDP to adapt the intervention to beneficiary needs (UNDP, 2018; UNDP, 2019a).

UNDP conducted six workshops between August and November 2018 and trained 73 SMEs, exceeding the intervention’s target of 50 (UNDP, 2018; UNDP, 2019a). Although it is too early to determine what the participants will do with the training, the intervention achieved its targets. Key informants (C39, C132) stated that one of the most significant changes is that it reached a new business sector audience that previously lacked integrity and transparency policies. As of October 2019, the BWG and SME members were actively implementing actions to institutionalize learning (UNDP, 2019e).

#### *Platforms and tools*

*Finding 1a.4 – Among the partially effective interventions, the following four were particularly effective in developing platforms and tools to support their beneficiaries’ anti-corruption efforts:*

1. World Bank’s Open Data Contracting Standard (EDCA MX) directed at subnational governments
2. IMCO’s Mapping Corruption in Chihuahua
3. MEPP’s National Observatory for Regulatory Improvement (ONMR) directed at all 32 states and 80 municipalities
4. MEPP’s PEMEX Code of Conduct

*Finding 1a.5 – The following four factors enabled activities to effectively develop platforms and tools:*

1. Effective use of USAID’s convening authority
2. IPs’ role as a legitimate third party with technical knowledge
3. The existence of a champion within institutions
4. The working relations and reputation of IPs’ allies at both the local and national levels

The World Bank developed the Open Data Contracting Standard (EDCA MX), which was adopted by the Mexico City, Jalisco, Sonora, and Chihuahua subnational governments (C11, C48) (Government of Chihuahua, 2019; Government of Jalisco, 2019; Government of Mexico City, 2019). The Standard was an essential reference for developing the PDN of the SNA (Official Gazette of the Federation, 2018). A high-ranking official at the MPA (C11) considers the adoption of the EDCA MX at the federal and subnational levels as one of the most significant changes because it covers the entire public procurement process: planning, resource allocation, bidding, contract award, contract signing, and payments.

The World Bank tailored the EDCA MX to the needs and priorities of the country. Stakeholders were pushing in that direction, and it had champions, particularly at the MPA and Ministry of Finance, to move the intervention forward. Having a third party with the technical know-how also encouraged CSO collaboration, in this case, from Transparencia Mexicana (C79, C161). Public officials, engaged in all World Bank’s interventions, also valued its technical expertise (C14, C18, C35, C79, C161).

IMCO effectively developed its Corruption Index. As of August 2019, the index was in the final phase before release for use by local public officials and civil society. In Chihuahua, IMCO scanned 5,430 documents with data from 2014 to 2017 related to 1,247 procurement processes (Chihuahua Mapping Corruption Presentation, 2019). As of October 2019, the government of Chihuahua adapted the methodology to replicate the exercise for the health sector and has also shown interest in connecting their local public procurement platform with IMCO's (C12, C92, C144).

Three key informants agreed that IMCO's intervention created an innovative methodology and an alternative to audits while simplifying the analysis of public procurement processes (C51, C92, C144). Working relations and the reputation of IMCO's local allies—in this case from the Council for Economic Development of the state of Chihuahua (CODECH)—were critical for achieving results because their connections within the local political leadership facilitated communication (IMCO, 2017) and helped push the government into releasing needed information (C12, C92).

MEPP's work with the National Observatory for Regulatory Improvement (ONMR) trained a total of 327 GOM officials (exceeding the target of 75). As a result of the intervention, subnational governments passed legislation to simplify administrative procedures. The intervention also assisted all 32 state governments and 80 participating municipalities to implement important changes in their legislation and day-to-day processes. This is a significant achievement, considering that the original intent was the dissemination of information on the status of regulatory policies around the country (C32, C141). Informants also valued the IP's technical capabilities, as well as those of the National Commission on Regulatory Improvement (CONAMER), and USAID's convening authority through MEPP (C32, C141). Finally, the ONMR (now under the guidance of CCE) continues to be a tool for improving local laws, institutions, and processes (C32, C113).

For the PEMEX Code of Conduct intervention, MEPP effectively gave in-person compliance training to 629 GOM officials (exceeding the target of 100). Informants (C81, C105, C149) pointed out as a significant change agent the courses and workshops for employees, which promoted behavioral changes that had not been achieved by other means. For example, trade union leaders now report probable ethical misconduct through institutionalized mechanisms (rather than solving them through political pressure as before), and staff complies with due diligence procedures, even though it increases the workload. Although institutional changes are usually reflected in the long term, there are positive signs of the institutionalization of the intervention. According to MEPP's documentation, PEMEX carried out and tracked training by itself after formal MEPP assistance had ended (Abt Associates, 2019c). Employees can access the PEMEX website for the Code of Ethics and Conduct and a reporting system for those who wish to report concerns about unethical or illegal behaviors about the company.

#### *Building civic–government collaboration*

*Finding 1a.6 – The following five interventions were particularly effective at building civic–government collaboration:*

1. UNDP's co-responsibility fund directed at supporting local grassroots organizations in their anti-corruption efforts
2. TRRP's 100-Day Anti-corruption Challenge directed at state anti-corruption institutions in Coahuila with the active participation of civil society
3. ICMA's collaborative strategy between civil society and the government in Coahuila and Chihuahua
4. The World Bank's participatory budgeting mechanism in Cananea
5. CCINL's *Soy Honesto Hoy* campaign in Nuevo León

*Finding 1a.7 – The following six main factors enabled activities to effectively build civic–government collaboration:*

1. The appropriateness of the assistance—program design was tailored to the needs and priorities of target groups
2. Flexibility and timeliness of the intervention
3. Integrating counterparts and beneficiaries in the early stages of implementation, specifically at the inception or initial stages, and establishing a collaborative working relationship between civil society and the government
4. The IP's technical expertise, reputation, and working relations
5. Effective use of USAID's convening authority
6. The existence of a champion within institutions

Through the Co-responsibility Fund, UNDP identified 10 local grassroots organizations and enhanced their organizational capacity. In terms of building internal capacities, CSOs profited from UNDP's technical assistance to strengthen their proposed projects with better structures, work plans and results frameworks, training on integrity, monitoring and evaluation, finance planning, and administrative topics. With respect to building collaboration and coordination with stakeholders, CSOs gained agency with public institutions, particularly those from the State Anti-corruption System. CSOs developed capacities to establish collaborative mechanisms with public institutions and expanded their network with other external experts who provided workshops and conferences in topics relevant to the local context and needs. (C7, C129, C148; UNDP, 2018; UNDP, 2019a; UNDP, 2019e).

As a result, these CSOs are working collaboratively with local anti-corruption institutions, particularly the CPC, where there had not been any previous communication (C7, C129, C148; UNDP, 2019e). UNDP's close follow-up of CSO's needs and progress, its technical expertise, and UNDP's reputation were relevant factors in effectively implementing this intervention (C7, C39, C129).

The 100-Days Anti-corruption Challenge implemented by the TRRP effectively improved coordination among state anti-corruption institutions in Coahuila, while also engaging civil society (C55, C62, C63, C94, C95, C115, C127). Key informants, including public officials and CSO members, reported coordination mechanisms as among the most significant changes. Interventions resulted in a better understanding of institutions' roles and how civil society can best engage with them (C55, C62, C63, C94, C95).

As of August 2019, CSOs and state anti-corruption institutions continued working together in establishing the next steps to formalize institutional changes, intending to improve oversight by non-governmental actors. TRRP's demand-driven design, technical guidance, and the existence of a champion to bring state anti-corruption institutions on board, particularly the head of the judicial power, were relevant for effectively implementing the challenge (C80, C94, C115).

The interventions implemented by ICMA resulted in CSOs adopting a collaborative strategy that has facilitated their engagement with GOM entities. Key informants reported that the Public Ethics Consolidation (PEC) intervention led them to change their approach to combatting corruption, from a punitive and confrontational one to a preventive approach (C13, C33, C88). ICMA's activity supports CSO efforts to determine if public institutions implemented tools and procedures that foster an ethical environment. They also provided recommendations for improvement (ICMA-ML, 2017b).

As of October 2019, five CSOs are involved in the intervention, and three are conducting evaluations using a collaborative strategy that facilitates engagement, instead of a contentious approach (C13, C60, C88). Examples of this collaboration are Locallis, a local CSO working with the Superior Audit of Coahuila State (ASEC), and the *Red para la Participación Ciudadana de Chihuahua*, which is collaborating with the Chihuahua Family Development Agency (DIF Chihuahua). Members of participating CSOs considered the most significant change to be that they learned more anti-corruption strategies and even received requests from local enterprises to develop codes of ethics (C13, C33, C140).

The Participatory Budgeting Mechanism in the World Bank's Mining Fund pilot also achieved its targets, with a higher than expected participation rate (21 percent vs. 10 percent of the total voting population), and with most of the infrastructure selected in the participatory budget already completed (C35, C121; World Bank 2018). The pilot conducted 14 participatory meetings with 615 participants, selected and analyzed 377 projects, and executed 11 projects with an investment of MXN 42 million. Champions, particularly at the Ministry of Economy, encouraged the intervention, which was also supported by the technical expertise of the World Bank. Final beneficiaries identified as the most significant change that inhabitants are more willing to participate in a new round of participatory budgeting if it were to happen (C52, C101, C116).

The *Soy Honesto Hoy* (SHH) campaign achieved and even exceeded most of its targets. This was done through collaborative actions with local stakeholders. Twenty-seven local CSOs, 31 companies, and 371 individuals received anti-corruption training facilitated by Hagámoslo Bien (CCINL, 2019b). Through the communication campaign, SHH received 67 mentions in local media, conducted six interviews, and logged 32,174 visits to its website. Through artistic interventions, CCINL reached more than 10,000 people (CCINL, 2019c). Furthermore, SHH allies agreed that two significant changes resulted from the campaign. Eighty-five percent of local candidates in Nuevo León signed the anti-corruption and transparency pledge; and the authorities of the metropolitan municipalities of Escobedo and San Pedro de los Garza adopted the Incorruptible platform for citizen reports of possible corruption cases (C70; CCINL, 2019c).

Relevant factors are that the SHH campaign created a narrative tailored to the local context and considered existing anti-corruption efforts by different organizations and institutions (C109, C115, C126; CCINL, 2019f). Also, CCINL's credibility and experience in anti-corruption efforts were decisive factors in the implementation (C15, C126; CCINL, 2019c).

## *Networks*

*Finding 1a.8 – Three USAID activities (UNDP, TRRP, MEPP) were effective at building five networks.*

These are unintended results, but interviewees agreed they are among the most significant changes the team discovered in the evaluation—all but one activity established road maps to consolidate their actions in the future.

Although activities did not consider building networks as their primary task, five networks resulted from USAID-supported interventions: Open Government Transformative Local Agents Network (UNDP); CSO Anti-Corruption Network (UNDP); CPC National Network (TRRP); State Anti-Corruption Prosecutors Network (TRRP); and Journalists, Researchers, and Media Outlets Network (MEPP). Although it is too early to assess their effectiveness in promoting anti-corruption reforms in the long run, informants agreed that these networks are among the most significant changes resulting from these interventions. All but the journalists' network seem to have established a road map or working plan to consolidate their actions in the future (C14, C25, C39, C56, C93, C97, C106, C118, C120, C129, C132). If successful, these networks will allow them to continue exchanging information and practices, and to gain visibility and agency to press for changes in the anti-corruption arena. They might also act as a channel for involving new stakeholders.

## ***Partially Effective***

### *Capacity Development*

*Finding 1a.9 – The following four interventions were partially effective in terms of capacity development. They met their initial outputs, but their practicality and institutionalization remain uncertain:*

1. ICMA's Public Ethics Consolidation program (PEC) directed at government entities in Chihuahua and Coahuila
2. TRRP capacity development activities directed at public officials regarding their new responsibilities under the law
3. UNDP's Open Government and Citizen Participation intervention directed at individuals (local transformative agents) and Local Technical Secretariats
4. TRRP legal harmonization directed at the subnational level

*Finding 1a.10 – The following five main factors affected activities related to capacity development:*

1. Local political conditions
2. Failure to tailor activities to the counterparts' or beneficiaries' priorities and needs
3. Lack of clarity or agreement among partners, allies, and counterparts regarding the scope of the activity, decision-making processes, and roles and responsibilities, all contributing to coordination problems during implementation
4. Lack of flexibility to adapt to unforeseen circumstances
5. Reluctance to work with the U.S. government (USG), particularly on matters perceived as sensitive, such as legal harmonization

In the case of ICMA's Public Ethics Consolidation program (PEC), the use of the PEC's ethics training tool (Ethical Decision Exercises System, SEDE) varies significantly among institutions. After one year of implementation, use increased by 4.48 percent in the *Auditoría Superior del Estado de Coahuila* (ASEC) (ICMA-ML, 2018c; ICMA-ML, 2019a) but decreased by 28.32 percent in DIF Chihuahua (ICMA-ML, 2018b; ICMA-ML, 2019b).

Informants reported changes in staff awareness of improper behaviors (C16, C147, C181) and a higher level of compliance with norms regulating the use of institutional resources (C99, C160). However, public officials participating in the evaluation workshops believe the changes are still on an individual scale, not at the institutional level, and are not yet really significant (Evaluation workshops August 30, 2019, and September 02, 2019). Moreover, the platform for filing claims and posting questions (Anonymous Help System for Questions and Complaints, SAADD) has barely been used (C26, C147). Informants stated there were misunderstandings on the cooperation agreement and scope of work regarding the implementation of the SAADD tool, which DIF-Chihuahua argued was not in the original plan (C60, C96, C147).

TRRP's capacity development interventions directed at public officials regarding their new responsibilities under the law are another example. Among the actions developed during 2017, 655 government officials and 273 individuals affiliated with CSOs participated in workshops. In 2018, TRRP assisted in launching a new Massive Open Online Course (MOOC) platform on the SNA and supported INAI in developing a manual on the linkages between the SNA and the National Transparency System (Checchi, 2017a; Checchi, 2018a).

Although the IP achieved its targets, evaluations of their adequacy differ. Some interviewees (C4, C59, C82, C134, C82, C4) pointed out that workshops and manuals were crucial for strengthening human capacity and institutional performance. In contrast, others (C56, C97, C165) believe they lack adequate consideration of decision-makers or institutional priorities, or that follow-up is needed. It is also early to conclude what behavioral or institutional changes will result from the training provided.

Through component 1 (Open Government and Citizen Participation), UNDP effectively trained 18 Local Transformative Agents in session 2017 (80 percent of the target) and 37 in session 2018 (92.5 percent of the target). However, the intervention encountered challenges to integrate them and their projects into the Open Government Local Technical Secretariats (LTS). One stated reason was that not all LTSs were consolidated by the time of implementation. Another reason concerned political conflicts among vital

players (between LTS commissionaires or between them and INAI) that prevented them from incorporating citizens' proposals in their agendas (C25, C106; UNDP, 2017; UNDP, 2018).

An additional reason stated by informants was the lack of incentives from local transparency institutions to collaborate with the intervention and the fact that it was not tailored to the LTS needs (C54, C93). For example, in Chihuahua, UNDP and INAI wanted to organize forums. However, these had already taken place, and the LTS had already identified actions and the main topics to work on over the following months (C54). Also, Local Transformative Agents and their Local Action Plans were not in line with the identified topics and actions (C54). Lack of flexibility to adjust to the local political realities added to coordination problems because both INAI and UNDP "owned" the intervention and their visions and priorities did not always match (C35, C39, C106). As a result, UNDP's intervention failed to create spaces for joint civic-government policy development.

Lastly, TRRP legal harmonization in the states was also partially effective. TRRP was a mechanism to help consolidate key local anti-corruption bodies and align local legal frameworks. However, the intervention faced challenges because some institutions were not willing to participate, mainly out of distrust (Checchi, 2017). As explained by informants, legal harmonization is a sensitive matter. Actors may not be familiar with USAID's programs, and some CSOs (mainly in Mexico City, but also in the states) showed reluctance to work with the USG (C29, C46, C80, C115). However, when the opportunity was presented, TRRP managed to assist the CPC and the local legislature in drafting state anti-corruption laws. In the case of Chihuahua, local government bodies even considered some of TRRP's suggestions in the final proposal (C139; Checchi, 2017).

Although the Alliance for Integrity was an ongoing activity at the moment of the evaluation, its second component (improving access to justice and the rule of law) was both negatively and positively affected by local political conditions. The original work plan considered the state of Jalisco for evaluating the implementation of the local criminal justice reform. However, the state's new General Prosecutor (appointed in 2018) backed down from the commitments made by his predecessor. IMCO was nevertheless able to overcome this challenge by establishing a collaborative agreement with the state of Coahuila, which provided the required data on time to allow the activity to resume (C142).

### *Tools and platforms*

*Finding 1a.11 – The implementation of the following four tools and platforms was partially effective because these are either on hold, face threats to their sustainability, or lack sufficient evidence as to their practicality or institutionalization:*

1. IMCO's Mapping Corruption in Nuevo León
2. The World Bank's Open Government Policy Paper and Diagnostic of the Participa Platform
3. MEPP's visualization tool for Public Works
4. UNDP's Initiative for the Institutional Strengthening of Social Programs (IPRO) platform

*Finding 1a.12 – Three main factors affecting activities related to tools and platforms include adverse political conditions, rotation of key government officials, and changes in priorities at both the federal and state levels.*

According to IMCO's Mapping Corruption documentation, in Nuevo León, *México Evalúa*<sup>10</sup> scanned 3,500 documents related to 588 procurement procedures. IMCO built a similar database to the one in Chihuahua (Q2, Quarterly Narrative Report 2019). According to interviewees (C12, C51), the public

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<sup>10</sup> Co-implementer of this activity.

version of IMCO's platform is pending release. Nonetheless, the government did not introduce formal institutional changes in Nuevo León (C12, C51; IMCO, 2019c; IMCO, 2019g).

In the case of the World Bank, authorities do not use the Open Government Policy Paper and Diagnostic of the *Participa* platform. The main reason was an impasse in the Open Government Action Plan implementation process due to a scandal of government espionage on CSOs (World Bank, 2018), and to changes in the Ministry of Public Administration's priorities (C83). The contents of the proposed financial disclosure template, although effectively developed by multiple actors, were not incorporated in the final format approved by the SNA Coordinating Committee (C14, C83, C137).

MEPP's visualization tool for Public Works aimed at improving the electronic platform to generate useful data on all phases of government contracting. Despite being effectively delivered, informants (C31, C111) report a risk that the information will not be updated. The databases will not be linked to the new tool because it is not a priority of the new administration. Similarly, the implementation of UNDP's Initiative for the Institutional Strengthening of Social Programs (IPRO) platform for public social program spending is on hold, with only 604 social programs registered (out of 3,000 set as the target). UNDP documentation (UNDP, 2018b; UNDP, 2019a) indicates that elections and government changes are the reasons for their lack of progress.

### ***Not Effective***

*Finding 1a.13 – Two following interventions were not effective, did not meet their stated targets, and were not institutionalized:*

1. MEPP's Compranet redesign
2. The World Bank's Social Accountability Pilot

*Finding 1a.14 – The main factors affecting these activities are related to changes in the administration and their priorities, and an adverse political context.*

Despite the creation of a multi-stakeholder working group, MEPP's Compranet redesign program was abruptly terminated by the new administration. The GOM did not consider the group's analysis and recommendations, rendering their efforts fruitless (C43, C131, C150).

As for the World Bank's Social Accountability Pilot, key informants from the IP and the counterpart reported an agreement to have the Social Accountability Computer System (SICS) 3.0 ready for use by the end of the previous administration (C72, C83). The new team at the MPA received the system and its documentation, but, according to a top public official (C156), the Ministry decided not to adopt the platform. They had concerns about whether it could be used politically or to whitewash corruption.

### ***Conclusions***

*Conclusion 1a.1 – The supported activities achieved most of their stated goals, therefore in general they were effective. USAID's convening authority and IPs' technical expertise, reputation, and role as legitimate third parties were helpful in getting actors on board, apart from a few cases where institutions and CSO members were unwilling to cooperate with USAID-supported activities (e.g., TRRP's legal harmonization, World Bank).*

Examples of the effective use of USAID's convening authority are TRRP (all interventions but legal harmonization in the states) and MEPP (particularly the interventions of PEMEX Code of Conduct and the National Observatory for Regulatory Improvement). Cases in which the IPs were able to be effective

because of their technical expertise, their role as a legitimate third party and convening authority were UNDP, World Bank, IMCO, and CCINL.<sup>11</sup>

*Conclusion 1a.2 – Activities tend to be more effective when tailored to the local context, needs, and priorities of the target group, as well as when they incorporate their counterparts and beneficiaries early on, that is, from the design phase when possible or at the beginning of implementation.*

Examples of effectively tailored activities and incorporation of counterparts and beneficiaries early on were TRRP's activity (all components); CCINL's *Soy Honesto Hoy* campaign; UNDP (integrity and transparency course for public officials and for SMEs, and Co-responsibility Fund); and the World Bank's Open Data Contracting Standard (EDCA MX). Interventions that were less successful because their design did not meet needs or did not adapt to changing circumstances include UNDP's open government activity (which effectively co-designed the intervention with key actors like INAI, but inadequately tailored it to the counterparts' needs in the states), and ICMA's activity (successfully incorporated CSOs in a collaborative strategy, but inadequately involved local institutions, specifically DIF Chihuahua).

*Conclusion 1a.3 – Activities profited from the technical capacities, reputation, and working relations of local allies to advance the interventions among beneficiaries and counterparts, and to facilitate communication with authorities.*

Interventions profited from local allies' technical capacities, reputation and/or working relations. Included here are IMCO's Mapping Corruption (with CODECH at the beginning of the intervention, and with FICOSEC (*Fideicomiso para la Competitividad y Seguridad Ciudadana*/ Trust for Competitiveness and Citizen Security); IMCO's Alliance for Integrity (with government of Coahuila); ICMA's activity (with CSOs such as Locallis in Coahuila and the *Red para la Participación Ciudadana* in Chihuahua); World Bank's EDCA MX platform (with Transparencia Mexicana); and MEPP's National Observatory for Regulatory Improvement (with CONAMER).

*Conclusion 1a.4 – Changing political contexts and potential changes in counterparts' priorities enable those activities with more flexibility to adjust to unforeseen circumstances.*

Activities must have clearly defined objectives and theories of change. However, flexibility is also needed to respond to unforeseen circumstances and meet emerging demands. Some examples of interventions exhibit more flexibility to adjust to unforeseen circumstances than others. These include the TRRP activity (all components), UNDP (course for MPA public officials), IMCO's Alliance for Integrity in Coahuila, and IMCO's Mapping Corruption in Chihuahua. Those interventions that exhibited less flexibility to adjust to unforeseen circumstances include both components of the World Bank's intervention.

*Conclusion 1a.5 – The existence and permanence of champions within institutions proved to be a relevant enabler, as well as a constraint when missing.*

Interventions that profited from an internal champion include TRRP's 100-Days Anti-corruption Challenge (head of the judicial power in Coahuila); IMCO's Mapping Corruption (Governor in Chihuahua); IMCO's Alliance for Integrity (government of Coahuila); ICMA (local MPA); World Bank's EDCA MX platform (leadership at the MPA and Ministry of Finance) and Participatory Budget in Cananea (leadership at the Ministry of Economy); MEPP's National Observatory for Regulatory

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<sup>11</sup> There were, however, situations in which some actors showed reluctance to collaborate with USAID-supported activities: TRRP (CPC leadership in 2017, legal harmonization in the states) and World Bank (especially the Ministry of Public Administration, which forced major revisions of both of World Bank's components and delayed the implementation of the Social Accountability process and financial disclosure format).

Improvement (General Director of Special Projects in CONAMER); and MEPP (Public Works spending portal). Interventions that were affected by the absence or removal of an internal champion include the World Bank's Social Accountability process (change in MPA leadership) and the Participatory Budget pilot in Cananea (change in local government); IMCO's Mapping Corruption (MPA in Chihuahua and the Education and Comptroller Secretaries in Nuevo Leon); and MEPP's Compranet redesign (change in MPA leadership).

*Conclusion 1a.6 – External factors significantly affected activity performance, and among these, the lack of political will and changes in priorities were the most significant.<sup>12</sup>*

Examples of interventions affected by lack of political will and changes in the counterpart's priorities include the World Bank (all components), IMCO's Mapping Corruption intervention in Nuevo León, UNDP (pilot course for MPA public officials and IPRO platform), TRRP (Social Witness program with the MPA and legal harmonization in the states), MEPP's Compranet redesign, and IMCO's Alliance for Integrity intervention in Jalisco. Interventions that profited from changes in the counterpart's priorities and political will were MEPP's PEMEX Code of Conduct, IMCO's Mapping Corruption in Chihuahua, TRRP's assistance to the national CPC in 2018 and interventions at the state level, ICMA's intervention in both states Chihuahua and Coahuila, and IMCO's Alliance for Integrity in Coahuila.

## **Recommendations**

*Recommendation 1a.1 – Continue the good practice followed by successful interventions and tailor activities to the target group's local context, needs, and priorities.*

The IP should involve working partners early in the design process. At the inception of activities, IPs should be required to map key actors and conduct needs assessments in each policy area or locality in a way that is grounded in expected behaviors and ongoing experience. TRRP provides an example of an activity that conducted permanent monitoring of key actors, their roles, and priorities. Once mapped, IPs should hold a round of talks and discussions to integrate their beneficiaries and counterparts' concerns and priorities into the design. This enables them to better tailor the intervention to specific outputs and outcomes. When possible, the IP should encourage the involvement of CSOs and other relevant stakeholders at the local level. Their participation adds legitimacy, helps to motivate authorities, and enhances ownership and sustainability.

The *Soy Honesto Hoy* campaign is an example of a good practice that could be encouraged by USAID in future programming. CCINL created a narrative tailored to the local context and considered existing anti-corruption efforts made by different organizations and institutions. Specifically, CCINL conducted the following exercises to tailor the Activity:

1. Consulted local surveys like Citizen Culture and Culture of Legality and used background information
2. Held open space urban interventions to collect the opinions of people living in those areas
3. Interviewed key stakeholders to gather different approaches related to corruption
4. Conducted co-design workshops with experts to plan the implementation and set expected results
5. Conducted an anthropological study and a baseline on the levels of normalization of corruption

In addition, CCINL looked for a broad alliance with local actors from the beginning. Their actions led to effectively involving more than 58 actors, 18 CSOs, 31 companies, six universities, 14 media, and four business chambers.

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<sup>12</sup> Evaluation Question 1b (following) details findings and recommendations on external constraints to USAID's activities.

*Recommendation 1a.2 – Follow good practice and provide reasonable flexibility at the intervention level to meet target groups’ needs and deal with unexpected circumstances.*

Flexibility, especially at the intervention level, is needed to respond to unforeseen circumstances and meet emerging demands. Activities show different degrees of flexibility. Two activities are insightful in applying this recommendation. TRRP was designed as a demand-driven mechanism to address a range of requests from the GOM, civil society, and USAID. During 2017, TRRP encountered challenges as the national Citizen Participation Committee (CPC) was initially unwilling to collaborate with the activity. In response and thanks to its flexibility, USAID reoriented its efforts to the state level, where it supported the creation of a national CPC network and a network of state-level anti-corruption prosecutors.

Another example is the UNDP. In terms of the activity design and operation, Component 2 was more flexible than Component 1. This had consequences on the Local Transformative Agents program (Component 1). It was more difficult for it to adapt to unforeseen situations, particularly the adverse local political conditions and lack of incentives to collaborate from their counterparts in the states, the Local Transparency Secretariats. In contrast, when MPA’s leadership team changed, UNDP (Component 2) was able to adjust the online integrity course to the needs and priorities of the new administration and achieved its targets.

*Recommendation 1a.3 – Invest in creating communities of practice.*

USAID’s convening authority provides opportunities to create communities of practice and thematic networks, engaging public officials who could become champions in specific interventions. An example of this point is USAID’s successful support to the introduction of the accusatory penal system in Mexico and to developing a career civil service in the federal government. Other examples are the networks resulting from USAID-supported interventions, particularly the CPC National Network (TRRP) and the State Anti-Corruption Prosecutors Network (TRRP).

#### **EQ 1B. WHAT EXTERNAL CONSTRAINTS, IF ANY, HAVE IMPACTED USAID’S ENGAGEMENT ON THIS ISSUE?**

Each activity evaluated in this study faced their own conditions and challenges (details are presented in Table 45, Annex V). In this section, the ICME team summarizes the evidence that external factors may have affected the activities under evaluation. This refers only to those aspects that were similar across the set of cases analyzed, because they can be of interest for future endeavors.

#### ***Findings***

*Finding 1b.1 – Changes in counterparts’ priorities were a major obstacle at the national and local levels, in both the previous and current administration.*

In the case of the World Bank’s activity, changes at the top of the MPA made necessary a revision of all program interventions and components. This caused constant delays for the Social Accountability pilot and the approval of financial disclosure formats. (C14, C48, C83, C118, C137; World Bank, 2018). Despite delivering SICS 3.0 and its documentation to the new administration, the pilot has not been used (C91, C131, C150, C156).

Changes at the MPA also affected the UNDP’s activity (Component 2). Although UNDP achieved its targets, changes resulted in the need to reestablish relations and develop an alignment strategy with the new government’s priorities (UNDP, 2018b; UNDP, 2019a). The current ministerial leadership also suspended the Compranet redesign intervention (MEPP). Finally, TRRP gave assistance to the MPA by conducting a review and recommendations for the *Testigos Sociales* (Social Witnesses) program (Checchi, 2018a). After changes in the administration and priorities, the MPA stopped the collaboration,

expressed reluctance to work with USAID, and discounted the support given for the Social Witness program (USAID, 2019).

There are also examples at the subnational level. In Nuevo León, the Education and Comptroller Secretaries delayed the signing of the cooperation agreement to implement the Mapping Corruption activity (IMCO) almost a year and a half after the activity began. Authorities were also reluctant to share needed information, leading IMCO to ask for it through transparency channels (Comptroller and Government Transparency of the State of Nuevo León). Authorities stopped communication with IMCO (C12, C51).

Similarly, state legislatures, local governments, and a few CSOs were reluctant to accept assistance from the USG in drafting legal reforms (TRRP) (C80, C127; Checchi, 2017). Although the Participatory Budget pilot (World Bank) in Cananea, Sonora, was successful in its implementation, the new local authority has not taken any steps toward replicating this initiative (C35, C121).

*Finding 1b.2 – The existence of a champion can affect an activity positively or, when absent, negatively.*

In the case of IMCO's Mapping Corruption activity, the former Head of the MPA Chihuahua pushed forward the adoption and implementation of the intervention in Chihuahua. However, the pace of execution slowed after she left (IMCO, 2019f). In this same activity, the top operating executives of the two leading institutions in Nuevo León also left their positions, which caused delays and lack of coordination (C51; Consejo Cívico, 2018; Redacción Horacero, 2018; Reyes, D., 2019).

When key public officials left after the mid-2018 national elections, Compranet's MEPP activity faced termination (C91, C131, C150). Finally, in the case of the SICS 3.0 of the Social Accountability process (World Bank), it has neither champions nor ownership at the MPA (C11, C35, C83). Authorities continually delayed the implementation process, and it is not used by the current administration (C153).

*Finding 1b.3 – Local political conditions, the institutional capacities of public entities, and the salience of the integrity within the political agenda can have an important effect on activities' effectiveness.*

Local political conditions also affected some interventions. In the case of the UNDP's Open Government and Citizen Participation component, some Local Transparency Secretariats (LTSs) were not ready to engage, because they were new entities implementing basic structures and procedures. In another case, political conflicts among different vital players (i.e., between commissioners of the LTS or between them and INAI) prevented them from participating (C93, C106).

Another example is the World Bank's Open Government Policy Paper and Diagnostic of the *Participa* platform, which was not used by authorities. The main reason was the impasse in the Open Government Action Plan implementation process due to a scandal of government espionage on CSOs (World Bank, 2018), and to changes in the Ministry of Public Administration's priorities (C83).

On the other hand, IMCO's Mapping Corruption profited from momentum generated by the SNA framework for anti-corruption to move forward the activity (C23, C66, C74). Similarly, the sense of urgency in the states to show results was an enabling factor for TRRP to further their assistance at the subnational level (C80, C115).

## **Conclusions**

*Conclusion 1b.1 – In all eight activities reviewed, external factors were the most relevant in determining the activities' performance. Among them, lack of political will and changes in priorities were the most frequent and significant.*

Lack of political will is usually reflected in delays in the process, government institutions being reluctant to share information, and/or insufficient commitment to fulfill previous agreements. Examples are World Bank (all components), IMCO's Mapping Corruption intervention in Nuevo León, UNDP (pilot course for MPA public officials and IPRO platform), TRRP (Social Witness program with the MPA and legal harmonization in the states), MEPP's Compranet redesign, and IMCO's Alliance for Integrity intervention in Jalisco.

In other cases, interventions profited from changes in the counterpart's priorities and political will. These include MEPP's PEMEX Code of Conduct, IMCO's Mapping Corruption in Chihuahua, TRRP's assistance to the national CPC in 2018 and interventions at the state level, ICMA's intervention in both states Chihuahua and Coahuila, and IMCO's Alliance for Integrity in Coahuila.

*Conclusion 1b.2 – The existence and permanence of champions within institutions proved to be a relevant enabler, as well as a constraint when missing.*

Interventions were affected by the absence or removal of an internal champion. Examples include the World Bank's Social Accountability process (change in MPA leadership) and the Participatory Budget pilot in Cananea (change in local government), IMCO's Mapping Corruption (MPA in Chihuahua and the Education and Comptroller Secretaries in Nuevo Leon), and MEPP's Compranet redesign (change in MPA leadership).

Some interventions profited from an internal champion, including TRRP's 100-Days Anti-corruption Challenge (head of the judicial power in Coahuila), IMCO's Mapping Corruption (Governor in Chihuahua), IMCO's Alliance for Integrity (government of Coahuila), ICMA (local MPA), World Bank's EDCA MX platform (leadership at the MPA and Ministry of Finance) and Participatory Budget in Cananea (leadership at the Ministry of Economy), MEPP's National Observatory for Regulatory Improvement (General Director of Special Projects in CONAMER), and MEPP (Public Works spending portal).

*Conclusion 1b.3 – Changes in political conditions can open opportunities for interventions as well as become constraints to effective donor engagement.*

Interventions that faced negative external conditions include UNDP's Open Government component (political conditions of Local Transparency Secretariats), UNDP's IPRO platform (changes in state governments), CCINL (politicians running for election trying to take credit for the SHH campaign), and the World Bank's Open Government Policy Paper and Diagnostic of the Participa platform (scandal on government espionage on CSOs). Activities that profited from local political conditions were IMCO's Mapping Corruption, TRRP's interventions at the state level, MEPP's PEMEX Code of Conduct, and ONMR.

## **Recommendations**

*Recommendation 1b.1 – Follow good practice and provide reasonable flexibility at the intervention level to meet target groups' needs and to deal with unexpected circumstances.*

Activities need to respond to unforeseen circumstances and meet emerging demands. Two activities are insightful in applying this recommendation: (1) TRRP, a demand-driven mechanism; and (2) UNDP's components 1 and 2 where, in terms of intervention design and operation, component 2 was more flexible than component 1 (refer to Recommendation 1a.2 for more details).

*Recommendation 1b.2 – Continue the good practice of supporting multi-stakeholder coalitions to create a demanding environment that pushes reform and prevents backsliding.*

Government officials' priorities and political will for supporting internal reforms fluctuate and might respond to different factors. Networks that include non-governmental stakeholders— CSOs and the private sector—are essential for the interventions' sustainability. These coalitions can actively pressure decision-makers when they are lagging and can help assess the performance of interventions. Even when officials support internal reforms, the presence of external advocates can increase the probability of success. An example is the *Coalición Anticorrupción* in Nuevo León, which is monitoring the implementation of the commitments signed by the elected candidates during the *Soy Honesto Hoy* campaign and is also supporting local anti-corruption systems to enhance cooperation mechanisms with municipalities. Other interventions that created multi-stakeholder coalitions include MEPP's Observatory for Regulatory Reform; to some extent both UNDP's components; and on a minor scale, *Mapeando la Corrupción* and ICMA.

Defining a model for partnering with local stakeholders in subnational interventions is vital. The model should include actions to identify potential allies, strengthen their capacities, and prepare them to continue advocating for reform. They must be viewed as crucial elements to improve ownership and sustainability rather than merely to get specific tasks done.

*Recommendation 1b.3 – Invest in creating communities of practice to foster the presence of reform champions.*

The presence of a champion proved to be a significant enabler. USAID can take advantage of its convening authority and create communities of practice and thematic networks to engage public officials who could become champions in specific interventions. An example is USAID's support to introduce the accusatory penal system in Mexico and in developing a career civil service in the federal government. Other examples are networks that resulted from USAID-supported interventions, particularly the CPC National Network (TRRP) and the State Anti-Corruption Prosecutors Network (TRRP).

*Recommendation 1b.4 – Assess critical benchmarks to identify warning signals regarding lack of political will form public authorities.*

IPs' risk assessments should be complemented with a set of critical benchmarks to serve as fixed points of reference against which the interventions can confirm the degree of political will among key counterparts and allies in different phases of implementation. Lack of political will is usually reflected in delays in the process, reluctance to share information, and/or an inability to fulfill previous agreements. Hence, IPs should be encouraged to identify indicators to track the critical assumptions made about political will, unless the intervention specifically targeted political will. Establishing these and other critical benchmarks for each intervention can help IPs to identify "warning signs" and adjust their strategies in a timely fashion.

## **EQ 2A. HOW WELL DOES EXTERNAL PRESSURE FROM CIVIL SOCIETY ORGANIZATIONS (CSOS), MEDIA OUTLETS, AND CITIZEN PARTICIPATION IMPROVE ACCOUNTABILITY AND TRANSPARENCY?**

The evaluation team defined external pressure as no involvement from the targeted public counterpart to be affected by the intervention, regardless of whether a public institution participated in the implementation. In other words, these are cases where the implementing partner did not associate or work together with the political institution in which changes were expected to be seen as a result of the intervention.<sup>13</sup> Out of the eight assessed activities, three matched this definition: MEPP's Capacity

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<sup>13</sup> For example, even though Abt partnered with CONAMER (a public institution) for the National Regulatory Improvement Observatory, it is considered as external pressure because the targeted public counterparts were the states and municipalities.

Development for Journalists, MEPP's National Regulatory Improvement Observatory (ONMR), and CCINL's *Soy Honesto Hoy* (SHH).

## **Findings**

*Finding 2a.1 – All three activities that involved external pressure proved to be effective in meeting their stated goals.*

MEPP's Capacity Development for Journalists trained a total of 283 reporters and researchers (out of a target of 150) between the activity's option and extension periods. After training, these participants published 38 articles in Mexican media, exceeding the target set of 30 (Abt Associates, 2019c). MEPP's National Regulatory Improvement Observatory (ONMR), executed during the extension period, succeeded in implementing an electronic platform on which the 32 state governments and 80 municipalities reported information on their business-related regulations and procedures. In addition, 327 local officials received training on regulatory improvement and regulatory data management, more than four times the target of 75 (Abt Associates, 2019c).

The *Soy Honesto Hoy* campaign managed to get 85 percent of local candidates in Nuevo León to sign an anti-corruption and transparency pledge, while also succeeding in having the municipalities of Escobedo and San Pedro de los Garza adopt the Incorruptible platform for reporting potential corruption cases (C44, C46, C166). Moreover, normalization of corruption decreased by 1.2 points (on a scale from 0 to 10), as reported by citizen perception (CCINL, 2019c).

*Finding 2a.2 – Outcomes from these three activities are oriented to performance-related targets rather than to advance transparency and accountability.*

The goals set for these activities responded to how they performed in delivering the outputs established, not in defining their contributions to enhance integrity, transparency, and accountability. This means that it was not possible to establish a clear relationship between the expected and achieved outcomes and improvements in transparency, accountability, and integrity. The outcomes from the two MEPP interventions follow established categories regarding the work done by Abt Associates, such as *Number of people affiliated with non-governmental, research, or journalistic organizations receiving USG-supported training*, or *Number of open government articles or data visualizations published in the Mexican press* (Abt Associates, 2019c). Similarly, CCINL used metrics that focused on aspects such as visits to the *Incorruptible* platform, or the number of participants that assisted through organized workshops (CCINL, 2019c).

*Finding 2a.3 – Based on the characteristics and results from these activities, they all proved effective, and thus all three approaches can be considered successful.*

All three activities that involved external pressure advanced, in varying degrees, accountability and transparency through acting upon different dimensions of these issues. Capacity Development for Journalists, for example, never collaborated directly with federal or local governments. Instead, it focused on improving researchers' capabilities for making use of available public data to hold public officials and institutions accountable (Abt Associates, 2019c). The Observatory, on the other hand, pushed local governments into conforming to a set of strict guidelines on what their legislation on regulatory improvement should contain, how to establish their leading institutions in this policy area, and the way to strengthen their processes (Abt Associates, 2019c). By taking part in a comprehensive public assessment that produced specific recommendations, local governments managed to achieve higher levels of transparency, as noted by two key informants (C32, C91). Finally, the SHH campaign tackled a different area, mainly pressuring candidates and public officials into publicly adhering to a set of anti-corruption

commitments while promoting the adoption of an electronic platform for reporting corruption and leveraging the experience and past work of local CSOs (CCINL, 2019c).

## **Conclusions**

*Conclusion 2a.1 – Considering goals set, all activities that involved external pressure proved to be effective.*

The activities implemented by MEPP and CCINL that involved external pressure effectively achieved their targets and generated significant changes beyond them. The three activities reported meeting all but one of their life-of-project outcomes. The only exception is SHH's target of the number of companies involved in workshops. According to their documentation, SHH encountered minor obstacles during implementation (Abt Associates, 2019c; CCINL, 2019c).

*Conclusion 2a.2 – It was not possible to establish a clear relationship between the expected and achieved outcomes and the improvement of accountability and transparency.*

Although all three activities managed to achieve their expected outcomes, all but one of them (SHH's *Normalizómetro*) measure the work done by the implementers—e.g., setting targets for people trained, or getting candidates to sign a pledge—with a limited link to advancing accountability and transparency efforts from public institutions. For instance, an informant (C119) from MEPP's Data Journalism commented that “*the way outcomes are designed [is] certainly a problem, like in our case with several published articles . . . there have to be other ways to measure the project's impact more accurately.*” Many of these outcomes have the potential to be translated into specific actions by policymakers and public officials in later stages. However, it is not possible to demonstrate their direct contribution to such future behavior and/or policy changes. For example, CCINL acknowledged that even though their findings on the normalization of corruption are promising, they cannot be isolated from the influence of other factors (C103; CCINL, 2019c).

*Conclusion 2a.3 – External pressure can be an effective tool for advancing accountability and transparency.*

These interventions followed different approaches and operated in varied domains, and they all achieved their expected results. Therefore, multiple approaches can produce improvements in accountability and transparency. However, the expected outcome will depend on the type of activity executed and how the external pressure was exerted. In this case, for example, MEPP's Observatory worked directly with local governments on how to improve their legislation and day-to-day processes. One would assume that its impact on accountability and transparency would be higher than in the case of the SHH campaign, whose activities were more oriented to the general public, but this is not to say that efforts such as SHH should be overlooked in the future.

## **Recommendations**

*Recommendation 2a.2 – Continue supporting different forms of external pressure, because they can be successful in advancing activity goals and are potentially complementary.*

Corruption is ingrained in Mexican society, and action against it cannot focus solely on one dimension of the problem or on only one approach. Working directly with local governments and public officials might seem more productive, at least in the short term. However, it is crucial for USAID to continue funding a comprehensive portfolio of activities that, in the bigger picture, complement each other and contribute to fighting corruption and improving transparency and accountability. An informant (C73) who took part in MEPP stated that an important characteristic was that, although the activity's interventions were all

focused on fighting corruption, each of them did so from its own standpoint. It is desirable, however, for the activities to complement each other, especially those that take place in the same region.

*Recommendation 2a.3 – Tailor specific performance indicators that measure the activities’ contribution to the advance of accountability and transparency.*

Strengthen theories of change so they can define indicators that are useful to measure, or at least estimate, the contribution of the interventions to specific changes related to enhancing integrity, transparency, and accountability. Although the outcome of these activities might not be measurable in the short term—that is, by the time the activities come to an end—at least some indicators should be tied to specific changes in individual or organizational behaviors shown by governments and/or public officials and institutions (e.g., reducing corruption in auto licenses, establishing a social accountability mechanism, increasing public participation in decision-making). However, interventions should be able to affect or change those behaviors. Additionally, the contribution to such changes should be defined in an empirically verifiable way. For example, several local governments, including Mexico City, reformed their regulatory improvement legislation because of the work of the Observatory. Capturing this outcome would make a richer indicator of the activity’s impact on transparency. These should not replace the way current metrics are designed, but both are complementary metrics to consider.

## **EQ 2B: HOW EFFECTIVE OR EFFICIENT IS EXTERNAL PRESSURE COMPARED TO INTERNAL REFORMS WITHIN JUDICIAL AND POLITICAL INSTITUTIONS?**

A comparison of the effectiveness among internal reforms or external pressure found that both mechanisms are equally effective. Some activities present high effectiveness, and some moderate, little, or no effectiveness. Therefore, there is no indication among the eight activities evaluated that the mechanism employed was an explaining factor.

The evaluation team classified three different levels of effectiveness:

1. Basic – Open spaces for collaboration or improving coordination mechanisms
2. Intermediate – Fostering civic awareness or improving capacities related to transparency
3. Institutional – Changes in the legal framework or implementation of tools to reduce corruption

**Table 3. Main External Factors Affecting USAID-Supported Activities**

| Type              | Basic Level                                                                                                                                                      | Intermediate Level                                                                                                                              | Institutional Level                                                                                                   |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| External Pressure | Created alliances with local actors to get significant anti-corruption commitments from candidates and institutions alike.<br>Ex. <i>Soy Honesto Hoy</i> (CCINL) | Scrutinized the use of public resources to launch important anti-corruption investigations.<br><br>Ex. Capacity-Building for Journalists (MEPP) | Pushed local governments to reform legislation and processes by creating comparative rankings.<br><br>Ex. ONMR (MEPP) |

| Type                    | Basic Level                                                                                                                                                            | Intermediate Level                                                                                                      | Institutional Level                                                                                                             |
|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| <b>Internal Reforms</b> | <p>Improved coordination mechanisms and strengthened interactions between CSOs and State Anti-corruption System (SEA) members.</p> <p>Ex. 100-Day Challenge (TRRP)</p> | <p>Improved government tools for better transparency and accountability.</p> <p>Ex. SHCP Public Works portal (MEPP)</p> | <p>Created a Code of Conduct published in Mexico's official federal rules bulletin.</p> <p>Ex. PEMEX Code of Conduct (MEPP)</p> |

## Findings

*Finding 2b.1 – The evaluated activities employed external pressure and internal reform mechanisms that varied case by case, with some presenting high effectiveness, and some moderate, little, or no effectiveness.*

*Institutional Level – Changes in the legal framework or implementation of tools to reduce corruption.*

As a result of an internal reform mechanism, MEPP's Code of Conduct for PEMEX, designed and officially adopted in 2017, was published in *Diario Oficial de la Federación* on August 28 that year.<sup>14</sup> Along with the code, PEMEX established an ethics line to report offenses related to corruption, conflict of interests, among other inquiries on ethical and integrity issues. MEPP technical assistance also created an online capacity-building program that reached more than 20,000 employees and company leaders. The evaluation team was not provided with evidence to sustain those institutional changes in this administration. The official PEMEX compliance and ethics website<sup>15</sup> has information about the components.

As an external pressure mechanism, MEPP's National Regulatory Improvement Observatory (ONMR) helped state governments adopt legislation aligned with the Regulatory Improvement General Law by creating an electronic platform to gather and consolidate information about business regulations and documentation requirements from all 32 states and 32 municipalities, and contributing to the creation of a quantifiable indicator to assess how well states comply with the General Law (Abt Associates, 2019c; C73, C91).

*Intermediate Level – Foster civic awareness or improved capacities related to transparency.*

The Ministry of Finance Public Works Portal (2017) was an effective internal reform effort made through the work of MEPP's subcontractor Gobierno Fácil. MEPP technical assistance resulted in significant improvement in how the ministry presents budget data, which now includes information on implementation progress and geo-location. Because of the September 19 earthquake, the counterpart created another platform, *Fuerza México*, designed and developed with the Ministry of Finance a data management template that MEPP had created. This facilitated the ability to capture and display the

<sup>14</sup> [http://www.dof.gob.mx/nota\\_detalle.php?codigo=5495238&fecha=28/08/2017](http://www.dof.gob.mx/nota_detalle.php?codigo=5495238&fecha=28/08/2017)

<sup>15</sup> Official PEMEX compliance, and ethics website <https://www.pemex.com/etica-e-integridad/etica/Paginas/default.aspx>

locations of damaged buildings, including schools and hospitals, as well as relief and supply efforts in real time (Abt Associates, 2019c; C31, C111).

An example of external pressure was MEPP's grantee Data Civica's work in generating and strengthening the technical capacities of journalists who use and report on data in their work. MEPP supported the creation of an intensive technical course for reporters and NGO researchers who seek to publish articles about governmental accountability. This intervention trained over 300 professionals and resulted in dozens of public accountability articles published in media outlets (Abt Associates, 2019c; C73, C119).

*Basic Level – Open spaces for collaboration or improving coordination mechanisms.*

Internal reform examples include TRRP's 100-Day Anti-corruption Challenge and UNDP's Co-responsibility Fund. TRRP's 100-Day Anti-corruption Challenge, which focused on increasing the effectiveness and efficiency of institutional processes, improved coordination mechanisms among local anti-corruption institutions while strengthening interactions between these bodies and the CSOs by opening dialogue and collaboration. Building an understanding of each other's capacities, roles, and priorities was a result of the activity (C55, C62, C63, C94, C95). For instance, a CSO member stated that his view changed once he learned about institutional processes (C94). A member of the State Anti-Corruption System expressed willingness to expand collaboration with other external actors, such as private sector entities (C62).

*Consejo Cívico* successfully applied external pressure. One example is from the *Soy Honesto Hoy* campaign implemented in the state of Nuevo León. CCINL, together with 30 allied organizations, managed to get 166 congressional and mayoral candidates (85 percent) to subscribe to an anti-corruption and transparency pledge (#NLSinCorrupcion agenda). Two of the largest municipalities in the Monterrey metropolitan area, Escobedo and San Pedro de los Garza, committed to adopting the Incorruptible platform, which enables citizens to report corruption in public dealings (C5, C51; CCINL, 2019f).

*Finding 2b.2 – The implementing partners and counterparts took advantage of the window of opportunity that the political events opened to achieve higher effectiveness.*

Counterparts requested two out of eight activities implemented by MEPP, to take advantage of the windows of opportunity to make institutional changes. The PEMEX case combined two conditions. First was the necessity to disassociate from the former director Emilio Lozoya Austin (2012–2016) and his administration's corruption scandals (Reforma, 2020). During his tenure at PEMEX, he accepted bribes from construction companies such as Odebrecht and OHL to obtain public works tenders. Also, he received from 50 thousand to one million pesos to meet with businesspeople and politicians, as revealed by Santiago Nieto, the Head of the Financial Intelligence Unit (Reforma, 2019). The second example was the energy reforms adopted in 2014–2015 that significantly affected the governance of PEMEX, transforming it into a government-owned "productive enterprise." The reforms' agenda was to modernize the company. Its leadership prioritized internal changes to signal transparency and accountability to the global energy sector and associated legal authorities (C81; Abt Associates, 2019c).

The ONMR intervention was another case of external pressure. The websites of most urban municipalities in Mexico offer regulatory information that is incomplete or difficult to access. This opens the door to corruption and abusive practices. Mexico's National Statistics Institute reports that more than 70 percent of entrepreneurs who tried to open a business encountered local regulatory obstacles. Of those, 60 percent reported a lack of information as the leading cause of their problems (Abt Associates, 2019c).

To reduce the corruption that affects SMEs, the federal government advocated for the creation of a new law: The General Law on Regulatory Improvement. In 2017, the Federal Regulatory Improvement Commission (COFEMER) drafted the new law, and Congress approved it in May 2018. It establishes

“transparency, responsibility, and accountability” as central principles for carrying out regulatory improvement. Nevertheless, the law also has significant limitations. In deference to Mexico’s decentralized system of governance, federal legislation typically does not include detailed guidance, much less compulsory requirement, or implementing legislation, specifying how states must comply.

This gap between national standards and local government implementation led COFEMER, the Business Coordination Council (CCE), and its internal think tank (the Center for Private Sector Economic Studies, CEESP) to seek technical assistance from MEPP. Regulatory improvement is complicated and involves diverse state and municipal governments with varying degrees of capacity and commitment to make substantive reforms. The 100-Day-Challenge implemented by TRRP, Coahuila, and Jalisco recently led to the election of officials who had to distance themselves from the corruption scandals of previous governors—Jorge Aristóteles Sandoval Díaz in Jalisco and Rubén Moreira Valdés in Coahuila—and give legitimacy to the new Specialized Prosecutors (C62, C115).

## **Conclusions**

*Conclusion 2b.1 – Interventions that had counterparts with decision-making power and political clout reached institutional effectiveness.*

Two interventions presented institutional effectiveness, regardless of the employed mechanism, because they had strong counterparts as shown when those counterparts requested USAID technical assistance for an identified necessity within their institutions (Abt Associates, 2019c). Thus, the intervention has relevance in their public agendas, as well as a public endorsement from high officials (Abt Associates, 2019c; C73; IMCO, 2018b).

A counterexample was the World Bank interventions that had MPA as a major counterpart. This organization was a relevant public entity in the previous and current presidential administration. In this case, the lack of political will inside the institution affected the effectiveness of the outcome (C79, C83, C156). World Bank interventions could not fulfill their objectives for external reasons, including changes in the government and resulting changes in priorities in the MPA agenda. Initially, this program aimed to improve the design and effectiveness of government policies of transparency, public integrity, and citizen participation. However, the implementation of the Social Accountability Process did not reach completion due to a lack of political will from its counterparts (C11, C83). Moreover, according to a top public official (C153), the new federal administration has decided not to make use of the Social Accountability Computer System 3.0 (SICS 3.0), which is the information platform derived from this pilot (World Bank, 2018).

Another counterexample was the first component in the UNDP activity, where there was antagonism between UNDP and INAI. The lack of flexibility to adjust to the local political realities added to coordination problems, as both INAI and UNDP “owned” the intervention and their visions and priorities did not always match (C25, C39, C106).

*Conclusion 2b.2 – A good practice identified was to take advantage of opportunity windows presented by the political agenda (e.g., government changes, corruption scandals) to implement effective activities.*

The activities implemented within the framework of windows of opportunity—PEMEX, ONMR, 100-Day-Challenge—were effective in obtaining institutional changes, leveraging the momentum created by changes in government positions, legislative changes, or acting upon relevant issues in the public agenda. For specific examples, refer to question 1B.

## Recommendations

*Recommendation 2b.1 – Integrate the design/implementation phase with a counterpart/ stakeholder with decision-making power and/or political clout.*

A good practice is to have a strong counterpart or stakeholder with decision-making power and political clout to move the implementation process forward, act as an effectiveness catalyzer, and increase project ownership among stakeholders. Mapping Corruption in Chihuahua and Integrity Alliance in Coahuila are positive examples of this, specifically in their second component about improving access to justice and the rule of law.

*Recommendation 2b.2 – Follow the good practice of providing reasonable flexibility at the intervention level to meet target groups’ needs and to deal with unexpected circumstances.*

Although objectives to generate institutional outcomes are linked adequately to performance indicators, the activities should have a degree of flexibility to address unforeseen circumstances, and the ability to learn and adapt effective mechanisms during the implementation phase. This flexibility can help guide the implementation process toward the desired results. (For specific examples refer to question 1A.)

External pressure mechanisms should have well-defined goals regarding the desired effect on the behavior or processes of public institutions, but still be flexible enough to adapt to their targets’ priorities and needs. As for internal reforms, flexibility should address potential risks of changing political priorities or changes of government, as in the case of the World Bank and MPA.

### **EQ 3A. HOW CAN INTERNATIONAL DONORS BEST SUPPORT LOCAL<sup>16</sup> REFORM EFFORTS?**

Informants consulted for this evaluation were directly asked to provide a set of recommendations regarding the priorities for future donor efforts to advance transparency and fight corruption given the priorities of the new federal government, their negative attitudes toward CSOs, and the past administration’s corruption strategies. A total of 122 interviewees gave 149 recommendations, which were then grouped into categories for a better and clearer understanding.

## Findings

*Finding 3a.1 – Most recommendations were concentrated around fostering capacity development activities and a focus on working at the subnational level.*

The following table and accompanying figure show the most frequently mentioned themes:

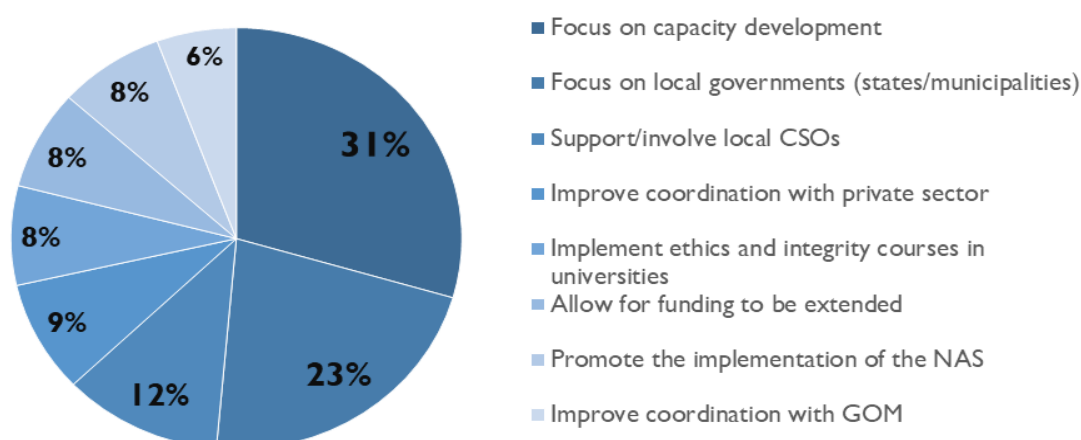
**Table 4. Most-Mentioned Recommendations**

| Category                                                                                          | Frequency of Recommendation |
|---------------------------------------------------------------------------------------------------|-----------------------------|
| Focus on capacity development of public officials, civil society, or private sector organizations | 24                          |
| Focus on local governments (states/municipalities)                                                | 18                          |
| Support/involve local CSOs                                                                        | 9                           |
| Improve coordination with the private sector                                                      | 7                           |
| Implement ethics and integrity courses in universities                                            | 6                           |

<sup>16</sup> In this context, “local” refers to country-level (both national and subnational). In every other case throughout the text, “local” means subnational.

| Category                                  | Frequency of Recommendation |
|-------------------------------------------|-----------------------------|
| Allow for funding to be extended          | 6                           |
| Promote the implementation of the SNA     | 6                           |
| Improve coordination with GOM             | 5                           |
| Support public procurement programs       | 4                           |
| Support whistleblower protection programs | 3                           |

*Figure 2. Frequency of recommendations as a percentage of interviewees that provided at least one recommendation<sup>17</sup>*



Nearly one-third of interviewees who provided at least one recommendation mentioned capacity development—whether for civil society, the private sector, or public officials—as a priority for future efforts in fighting corruption. Among the reasons cited was the urgent need to improve the technical and professional skills of local officials tasked with investigating accusations of corruption and related wrongdoings (C25, C62, C91, C99, C126, C139). Strengthening civil society’s capacity to oversee government performance and demand transparency and accountability from public institutions so it can become a vital counterweight is another frequently mentioned priority (C11, C25, C50, C126, C119, C137).

Those who were or are currently involved with the federal or local governments pointed out two areas that require crucial technical assistance in the upcoming years. These priorities are public procurement and the support for whistleblower protection programs. The experience with MEPP’s Compranet Redesign intervention, which terminated with the change in federal administration, prompted informants who took part in it to express concern regarding future efforts in public procurement. These informants stated that pressure from organizations outside the GOM will be key to keep this subject in the public agenda (C131, C150). Regarding whistleblower protection, its importance comes from the provision of secure channels for making formal accusations of corruption and related wrongdoings within public institutions, as stated by a local official (C96).

Almost a quarter of the informants who made recommendations commented on the importance of prioritizing projects with local governments (states and/or municipalities). Informants frequently cited the disparities between the federal government, Mexico City and the rest of the country (C11, C23, C45, C80, C87, C91, C131, C150). However, the current federal administration is reluctant to work with North

<sup>17</sup> Only recommendations with 6% or more are considered.

American donors (C43, C75, C131). Along the same line, nine informants emphasized the necessity to support local CSOs and guarantee their involvement when implementing projects in their states or regions. In a similar manner to the previous recommendation, informants also mentioned the inequalities between the capacities of Mexico City-based CSOs and those in the rest of the states as the main reason for supporting civil society at the subnational level (C12, C79, C109, C126, C171).

Promoting closer ties with the private sector was another theme highlighted. Recommendations in this category were mostly focused on strengthening the relationship between public and private entities (C69, C74, C128), and the implementation of business integrity policies (C107, C126, C140). Similarly, informants considered that support for the inclusion of ethics and integrity courses in universities is crucial to promote anti-corruption values and behaviors among civil society (C86, C96, C99, C117).

Regarding future work with the GOM, interviewees advocated for promoting the implementation of the SNA, mainly citing the difficulties in executing features contained in secondary laws (C28, C107, C142, C150). Multiple informants also backed public procurement programs as well as whistleblower protection policies. A key recommendation, mentioned primarily by former and current public officials, is that coordination with the GOM needs to be improved. In this aspect, informants stressed the importance of including public counterparts from the early stages of new projects, rather than approaching them when activities have already begun (C43, C131, C150).

## **Conclusions**

*Conclusion 3a.1 – Given the disparities in capacities at the local and federal levels, international donors could be more effective in advancing anti-corruption efforts if they invest in developing state and non-state stakeholder capacities at the subnational level.*

Implementers and beneficiaries alike recognized the urgency for future work to be allocated in two interconnected areas: promoting capacity development and advancing local efforts. As stated earlier, informants pointed out that those in most need of technical assistance are outside Mexico City, where the skills and capabilities of both civil society and local officials lag significantly behind those at the center. Thus, the three most-mentioned recommendations all prioritize capacity-building efforts in states or regions where public institutions and CSOs require assistance for carrying out anti-corruption tasks. The work done by UNDP, Checchi, ICMA, MEPP (Data Journalism), and the World Bank (Participatory Budget in Cananea) are good examples of interventions focused on the local level and the development of stakeholder capacities that produced positive results.

## **Recommendations**

*Recommendation 3a.1 – Direct future efforts toward subnational institutions and prioritize reducing the gap in capacities between the subnational and national stakeholders.*

Interviewees recommended that international donors turn their attention and allocate future resources toward the support of local governments and non-governmental institutions, both civil society and the private sector. According to informants, capacities at the local level also remain underdeveloped compared to the federal level and Mexico City-based institutions. Providing training courses and seminars should be prioritized.

### **EQ 3B. WHAT SPECIFIC MODALITIES OF ENGAGEMENT HAVE YIELDED RESULTS IN ADVANCING STATE AND NATIONAL ANTI-CORRUPTION SYSTEMS?**

The evaluation team analyzed the results attained by the eight activities selected for this exercise, considered observations and comments made by implementers and beneficiaries, and reviewed USAID

guidelines and procedures. The findings and conclusions presented below may apply only to these specific activities. Extrapolating this to the rest of the USAID portfolio might not be adequate. The specific modalities of relation between implementing partners and USAID are summarized in the following table.

**Table 5. Modalities of Engagement**

| Activity                                                                                                          | Implementing Partner                                                | Type of Agreement               |
|-------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|---------------------------------|
| Technical Assistance to Transparency and Anti-Corruption Laws/Systems (Transparency Rapid Response Program, TRRP) | Checchi and Company Consulting                                      | Contract                        |
| Increased Transparency Through Informed Civic Participation in Local Government                                   | United Nations Development Programme                                | Cooperative Agreement under BMA |
| Mapping Corruption: Network Analysis from Budget Allocation to School Services                                    | Instituto Mexicano para la Competitividad                           | Cooperative Agreement under BMA |
| Alliance for Integrity in Mexico                                                                                  | Instituto Mexicano para la Competitividad                           | Cooperative Agreement under GDA |
| Program Contribution to the World Bank Global Partnership for Social Accountability Multi-Donor Trust Fund        | World Bank                                                          | PIO Grant                       |
| Mexico Economic Policy Program (MEPP)                                                                             | Abt Associates                                                      | Contract                        |
| <i>Soy Honesto Hoy</i>                                                                                            | Consejo Cívico de las Instituciones de Nuevo León                   | Cooperative Agreement under BMA |
| Public Ethics Consolidation Program                                                                               | International City Management Association, Mexico and Latin America | Cooperative Agreement under BMA |

## **Findings**

*Finding 3b.1 – The success or effectiveness of the studied interventions cannot be tied to a specific modality of engagement.*

Based on both documental sources and information coming directly from implementers, the evaluation team did not find evidence of the success of an intervention being related to a particular modality of engagement. However, the sample includes only eight activities (with a very narrow sample for each type of modality) and is not large enough to draw reliable conclusions on this matter.

*Finding 3b.2 – Implementers valued co-creation and co-responsibility because they allow them to better design activities from scratch.*

There was not enough evidence to establish a clear link between a specific modality of engagement and the effectiveness of the activities. However, implementers strongly valued cooperation and even co-creation from the early stages of an activity. Bringing different perspectives together, in their opinion, contributed significantly to robust activity design (C23, C74, C93, C126). Informants also commented on the necessity for defining a clear internal coordination structure (between IPs and USAID as well as within participating IPs) that ensures all partners understand their roles and responsibilities, the decision-making process, and rules to be followed, especially for avoiding coordination problems between organizations (C25, C93, C106, C120).

*Finding 3b.3 – Ownership<sup>18</sup> among local actors varies considerably between the assessed activities, and even between interventions of the same activity.*

All of the evaluated activities reported some degree of ownership for at least one of their components. (This excludes the Alliance for Integrity because all of its components are still ongoing.) The evaluation team considered the following:

- High institutionalization occurs when binding mandates are introduced, or the continuation of activities is assured without USAID’s involvement.
- Medium institutionalization refers to non-binding formal commitments or cultural adoption of changes within an organization.
- Low institutionalization occurs when a stakeholder expresses commitment to continue some of the interventions or to make use of an activity’s deliverables without introducing formal agreements or institutional changes.
- No institutionalization occurs when the intervention had no follow-up or was terminated at the end of the period of performance.

Four interventions achieved a high degree of institutionalized ownership: TRPP’s Formalizing Governance and Legal Framework, Mapping Corruption’s Corruption Risk Index, MEPP’s National Regulatory Improvement Observatory, and Civic Engagement for Open Government, and CCINL’s Campaign and Collaborative Actions with Stakeholders. These networks established solid bases of collaboration and a clear road map that could make their efforts sustainable. In contrast, TRPP’s Access to Information, World Bank’s Open Government, and MEPP’s Public Procurement Reform failed to institutionalize, with neither of them reporting sustained efforts or follow-up activities. The rest of the interventions fall somewhere in between those presented above in terms of ownership (see Table 6), with no manifest standard variables that explain the level achieved. One aspect that stands out is that interventions lack a clear sustainability plan that ensures that the results achieved do not disappear and that the ongoing processes continue after the activity ends, with local stakeholder ownership.

**Table 6. Degree of Institutionalized Ownership**

| Activities                                           | High                                         | Medium                                                            | Low                             | None                    |
|------------------------------------------------------|----------------------------------------------|-------------------------------------------------------------------|---------------------------------|-------------------------|
| <b>Transparency Rapid Response Program (Checchi)</b> | - Formalizing Governance and Legal Framework | - Collaboration and Coordination of Stakeholders                  | - Building GOM and CSO Capacity | - Access to Information |
| <b>Increased Transparency (UNDP)</b>                 | --                                           | - Supporting Mexico’s Achievement of UNDP Sustainable Development | --                              | --                      |

<sup>18</sup> “The commitment and ability of local actors—including the governments, civil society, the private sector, universities, individual citizens—to prioritize, resource, and implement development, so that development outcomes have a greater potential to be sustained and generate lasting change without USAID assistance” (USAID, ADS Chapter 201, p.150).

| Activities                                        | High                                                                                                                                               | Medium                                                                                                                                 | Low                                  | None                                             |
|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------------------------------------------|
|                                                   |                                                                                                                                                    | Goals through Open Government and Citizen Participation<br>- Strengthening Transparency at the Federal and Subnational Level in Mexico |                                      |                                                  |
| <b>Mapping Corruption (IMCO)</b>                  | - Creating a methodology to detect risk factors in the public procurement process (Corruption Risk Index)                                          | - Increasing awareness of corrupt practices in public procurement                                                                      | --                                   | --                                               |
| <b>Social Accountability (World Bank)</b>         | --                                                                                                                                                 | --                                                                                                                                     | - Public Integrity                   | - Open Government                                |
| <b>MEPP (Abt Associates)</b>                      | - National Regulatory Improvement Observatory<br>- Civic Engagement for Open Government (Data Journalism)                                          | - PEMEX Code of Conduct                                                                                                                | --                                   | - Public Procurement Reform (Compranet Redesign) |
| <b>Soy Honesto Hoy (CCINL)</b>                    | - Collaborative actions with local stakeholders (CSOs, universities, and businesses)<br>- Traditional dissemination campaign (off-line and online) | - Artistic manifestations for a broad audience<br>- Book of daily corruption stories                                                   | --                                   | --                                               |
| <b>Supporting the Government of Mexico (ICMA)</b> | --                                                                                                                                                 | - Developing codes of ethics and ethical competencies                                                                                  | - Queries and whistleblower hotlines | --                                               |

## Conclusions

*Conclusion 3b.1 – Rather than modalities of engagement, effectiveness is closely tied to external factors, such as political timing and the presence of champions.*

As evidenced in Question 1b, the effectiveness of interventions is highly related to different external constraints, which were significant in determining the performance of most of the activities and its interventions.

*Conclusion 3b.2 – Co-designing and co-financing are considered promising models of engagement.*

Allowing for co-design and co-financing is important to expand the reach of international donors' engagement, foster ownership by key stakeholders, and increase the impact of activities. As noted by interviewees, when USAID takes on a client–contractor role rather than that of a working partner, it

creates a more complicated relationship that might hinder the effectiveness of activities or some of the interventions (C33, C74, C119). Taking on a more cooperative or supporting role, however, would require for USAID staff to be more involved in the activities, as stated by IPs (C91, C93, C106).

*Conclusion 3b.3 – Ownership and sustainability can increase by weaving a network of stakeholders, inside and outside of government, that hold the necessary competencies and interest to keep pushing for reforms.*

Incorporating local stakeholders in the design phase and through an activity's implementation can provide useful insights regarding their needs and how to meet them to enhance coordination and promote ownership and future sustainability. It is particularly important when the Local Systems Framework is guiding the interventions, because local actors have a better understanding of the system's dynamics as well as local stakeholders' needs, interests, and expectations. Positive examples of activities that benefited from including such networks were *Soy Honesto Hoy*, UNDP's Increased Transparency, TRRP, MEPP's ONMR, and the World Bank's EDCA MX. By comparison, the absence of involvement of stakeholders negatively affected the work of IMCO in Nuevo León.

### **Recommendations**

*Recommendation 3b.2 – Continue supporting activities based on co-designing mainly through calls for proposals and establish clear roles and responsibilities from early stages.*

Within ongoing initiatives such as the USAID's Global Development Alliance (GDA) Annual Program Statement (APS)<sup>19</sup>, create activity incubators around specific issues aligned with the portfolio strategy and local realities. Follow already established co-creation events, but with two fundamental changes: (1) The call for proposals should be restricted to pre-defined issues (understood as specific behaviors, whether individual or institutional) to be addressed in particular territories, with only those proposals addressing the priorities being accepted, and (2) after an initial round to partner similar or complementary proposed activities, each co-design group should be assigned to an IP that will assist the participants in developing a concept note and a proposal for funding. However, to avoid potential problems regarding coordination, roles and responsibilities must be clearly defined as early as the design phase.

*Recommendation 3b.3 – Create multi-stakeholder coalitions by defining a local partnership model for local interventions.*

Government officials' priorities and political will for supporting internal reforms fluctuate and might respond to different factors. Networks that include non-governmental stakeholders—CSOs and the private sector—are essential for the activities' sustainability. These coalitions can pressure decision-makers when they are lagging and can help assess the performance of interventions. Even when officials support internal reforms, the presence of external advocates can increase the probability of effectiveness. Thus, defining a model for partnering with local stakeholders in subnational interventions is vital. The model should include actions to identify potential allies, strengthen their capacities, and prepare them to continue advocating for reform. They must be viewed as key elements to improve ownership and sustainability rather than merely to get specific tasks done.

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<sup>19</sup> SAID's Global Development Alliance (GDA) Annual Program Statement (APS) helps the private sector and USAID work together to advance core business interests and achieve sustainable development impact. The GDA APS is an invitation to prospective partners to work side-by-side with USAID and other organizations to build transformational partnerships that foster and leverage market-based approaches to solve critical business and development challenges.

## **ANNEXES**

### **ANNEX I: EVALUATION STATEMENT OF WORK**

#### **SOW TRANSPARENCY AND INTEGRITY EVALUATION**

Integrity and Transparency Performance Evaluation in Mexico: Lessons Learned, Challenges, and Recommendations

#### **PURPOSE OF THE EVALUATION**

The purpose of this Performance Evaluation is to conduct a retrospective analysis of multiple interventions (listed in section II below) in the area of anti-corruption to verify results, extract lessons learned and best practices, and document challenges. This will include an evaluation of the performance of various implementing partners and implementation modalities. The findings will inform USAID/Mexico's Office of Integrity and Transparency (OIT) as they plan future programming. In addition, the evaluation will provide the State Department's Bureau of International Narcotics and Law Enforcement Affairs with an overview of the use of \$20 million of funding to USAID.

#### **SUMMARY INFORMATION**

The activities included in the scope of this evaluation are shown in Table 7:

**Table 7. Activities Included in the Present Evaluation**

| Activity                                                                                                        | Implementing Partner                                        | Agreement Contract # | Type of Agreement                   | Dates                    | Amount Awarded  |
|-----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|----------------------|-------------------------------------|--------------------------|-----------------|
| Technical Assistance to Transparency & Anti-Corruption Laws/Systems (Transparency Rapid Response Program, TRRP) | Checchi and Company Consulting                              | AID-523-TO-16-00003  | Contract                            | 10/2016 to 09/2021       | USD \$3,753,500 |
| Increased Transparency Through Informed Civic Participation in Local Government                                 | United Nations Development Programme                        | AID-523-IO-16-00001  | Cooperative Agreement under BMA     | 10/2016 to 09/2019       | USD \$2,800,000 |
| Mapping Corruption: Network Analysis from Budget Allocation to School Services                                  | Instituto Mexicano para la Competitividad                   | AID-523-A-16-00004   | PIO Cooperative Agreement under BMA | 10/2016 to 03/2021       | USD \$602,000   |
| Alliance for Integrity in Mexico                                                                                | Instituto Mexicano para la Competitividad                   | AID-523-A-17-00004   | Cooperative Agreement under GDA     | 09/2017 to 09/2022       | USD \$1,575,000 |
| Program Contribution to the World Bank Global Partnership for Social Accountability Multi-Donor Trust Fund      | World Bank                                                  | AID-523-IO-16-00003  | PIO Grant                           | 04/2016 to 01/2020       | USD \$2,700,000 |
| Mexico Economic Policy Program (MEPP)                                                                           | Abt Associates                                              | AID-523-C-13-00001   | Contract                            | 04/2016 to 04/2019       | USD \$4,750,000 |
| Nuevo León Transparency Public Outreach Campaign / Quiero confiar en México (BMA Addendum)                      | Consejo Cívico de Instituciones de Nuevo León, A.C. (CCINL) | AID-523-A-17-00003   | Cooperative Agreement under BMA     | 09/18/2017 to 03/17/2019 | USD \$980,000   |

| Activity                                                                                                             | Implementing Partner                                                                | Agreement Contract # | Type of Agreement               | Dates                    | Amount Awarded  |
|----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|----------------------|---------------------------------|--------------------------|-----------------|
| Supporting the Government of Mexico's Transparency and Ethics Priorities / Consolidando Ética Pública (BMA Addendum) | International City Management Association de México y Latinoamérica, A.C. (ICMA-ML) | AID-523-A-17-00002   | Cooperative Agreement under BMA | 09/14/2017 to 09/13/2020 | USD \$1,650,000 |

## Background

### A. Description of the Problem and Context

Over the last decade, Mexico has made notable progress in building and strengthening systems of accountability and oversight. Constitutional, legal, and regulatory reforms expanded government capacity in internal control and oversight and help to ensure citizens' right of access to information.

The National Anti-Corruption System (SNA), which entered into force in 2017, establishes a space where citizens, local governments, and federal institutions can converge to defeat corruption. However, uneven political will and capacity limitations hindered its full implementation. The SNA has a robust mandate and is expected to operate both nationally and across the 32 Mexican states, with each of these systems involving seven different executive and judicial branch entities, as well as autonomous entities and citizens. The complex system poses a significant learning curve for national and local government officials and Mexican citizens more broadly. Further adding to this complexity, a new Mexican administration took office in December 2018 following a sweeping electoral victory for the *Morena* party in both national and state-level elections. Though anti-corruption was a core campaign promise of new President Andres Manuel Lopez Obrador (AMLO), as of March 2019, the new administration was still developing specific policy frameworks to address the issue. These challenges are further manifested in public sentiment around corruption. Despite initial optimism following the SNA reforms, Mexico continues to decline in Transparency International's Corruption Perceptions Index, falling 15 places from 2016 to 2018 from 123 out of 180 countries to 138.

At the subnational level, the normative framework for the National Anti-Corruption System requires each state to establish a full range of specialized institutions, including anti-corruption prosecutors, administrative tribunals, and Citizen Participation Committees (to supplement existing institutions including auditors, internal oversight agencies, and transparency institutes). While a huge logistical and operational challenge, it is at the state level where USAID has seen the greatest opportunities. Though implementation is uneven and varies widely between states, there are some that are well ahead of the federal government on implementation. In states that prioritized the establishment and resourcing of key anti-corruption institutions, there are growing calls from civil society and citizens to see results. This dynamic, and Mexico's federal system, provides a unique opportunity for a demonstration effect to show that the SNA structure can work.

In 2015, the former Peña Nieto administration requested technical assistance from the United States Government (USG) to help support the nascent SNA. Beginning with an initial transfer of \$20 million in funding from the State Department's Bureau for International Narcotics and Law Enforcement Affairs, USAID has responded to this request by supporting the Government of Mexico's (GOM's)

implementation of anti-corruption reforms at both the federal and state level utilizing a range of mechanisms that include contracts, local awards, and multilateral agreements. Support has included technical expertise for developing guidelines, procedures, and legislation, training for government officials, and engagement with local civil society to advocate for reforms. Building on this initial engagement, USAID is increasingly partnering and co-financing activities with Mexican civil society and private sector actors to respond to GOM priorities to develop its institutional and technical capacity to fully implement the SNA, increase impartiality and professionalism in GOM audit functions and promote greater transparency in public procurement.

## **B. Theory of Change**

The transparency and integrity portfolio is based on the following underlying theory of change:

*“IF a critical mass of the Mexican citizenry demands accountability and transparency, AND key Government of Mexico (GOM) entities have developed the capacity to implement anti-corruption legal and policy frameworks, THEN GOM accountability and transparency will be strengthened and sustained.”*

## **EVALUATION QUESTIONS (EQs)**

**EQ1:** How effective is USAID’s approach to promoting implementation of SNA? What external constraints, if any, have impacted USAID’s engagement on this issue?

In answering EQ1, the evaluation team is expected to conduct a desk review of relevant activity documentation that includes indicator data and narrative reports. This desk review will include an evaluation of achievements against indicator targets, as set out at the beginning of the activity, and available documentation that explains or addresses the reason activity targets are not being met.

The evaluation team is also expected to provide a brief analysis of the social and political context as it represents constraints external to USAID’s implementation efforts.

The evaluation team is expected to collect data (additional quantitative data, where available from selected stakeholders, and qualitative data) from in-depth interviews that elicit informed stakeholder perspectives that inform the following:

- Explanations of why activity targets may not been achieved
- Evidence of knowledge and skills gained by individuals benefiting from the service (e.g., from pre- and post-intervention data collected, where available)
- Evidence that individuals trained by the activity have and continue to utilize skills gained
- Reported or observed change in the status of beneficiaries
- Any evidence, perceptions, and/or observations as to how and why the activity has made a difference or not
- Any evidence, perceptions, and/or observations regarding any change in the quality of service delivery attributable to the activity
- Any evidence and/or perceptions that the benefits from the intervention are sustainable
- Any evidence of useful lessons learned for potential replication and scale-up of activities

- Any evidence, perceptions, and/or observations that Implementing Partners (IPs) collaborate with the right partners at the right time to promote synergies
- Any evidence, perceptions, and/or observations that IPs are using data and information gathered through collaboration and learning activities to make better decisions and adjustments, as necessary

The evaluation team will develop question guides for specific categories of key informant interviews. Interview question guides should be designed to elicit data that, at a minimum, address the topics above; however, the evaluation team may include questions to elicit additional content required in order to satisfactorily answer Evaluation Question #1.

**Question #2:** How well does external pressure from civil society organizations (CSOs), media outlets, and citizen participation improve accountability and transparency? How effective or efficient is external pressure compared to internal reforms within judicial and political institutions?

In answering Question #2, the evaluation team is expected to conduct a systematic collection and analysis of qualitative data derived from in-depth interviews designed to elicit informed stakeholder experiences and perspectives that address the sub-questions below, and available quantitative data, as relevant.

1. What evidence is there from activity outcomes (incremental, learning, and intervention outcomes) and stakeholder experiences and perspectives that external actors (CSOs, citizens, and media outlets) have the capabilities to strengthen the ability and participation of the community to improve accountability and transparency of public institutions?
2. What constraints exist for civil society organizations to engage constructively with government institutions, both at the national level and locally? What are the common trends in CSO constructive engagement? What are the key thematic differences between CSO engagement at the national and local level, if any?
3. How do local civil society organizations view the role of USAID? How can USAID best support the efforts of CSOs in a constructive engagement at the national and local levels?

**Question #3:** How can international donors best support local reform efforts? What specific modalities of engagement have yielded results in advancing state and national anti-corruption systems?

In answering Evaluation Question #3, the evaluation team is expected to conduct a desk review of relevant activity documentation (indicator data and narrative reports) to assess to what extent SNA reforms have been implemented in target states.

The evaluation team is also expected to conduct a systematic collection and analysis of qualitative data derived from in-depth interviews designed to elicit informed stakeholder experiences and perspectives that address the sub-questions below, and available quantitative data, as relevant.

1. From the perspective of identified beneficiaries and other stakeholders, which implementation approaches of the SNA proved the most effective in building the technical and institutional capacity of state governments?
2. To what extent are SNA reforms “owned” by local actors in target states?

## Evaluation Design and Methodology

The design, methodological approach, and specific methods of data collection and analysis applied to this evaluation should generate credible evidence to answer the EQs above. The evaluation study should focus primarily on activities carried out by USAID IPs under the OIT portfolio. Before the start of data collection, the evaluation team lead is expected to provide the following to ICME for review: (1) a detailed description of the proposed evaluation study activities; (2) proposed tools/instruments for data collection or an illustrative tool with an outline of how data collection tools will be developed, and (3) a data analysis plan. As a complement to the narrative description of the proposed evaluation activities, the evaluation team is asked to provide an evaluation-planning matrix, such as the attached matrix. Where appropriate (as determined by the evaluation team lead in consultation with ICME), the evaluation team is encouraged to incorporate participatory methodology into aspects of the design. As noted above in the elaboration of the key EQs, the evaluation study design should use a mix of quantitative and qualitative tools appropriate to deriving/eliciting the information required to address the EQs. As noted above, it is expected that the study methods will include, but not necessarily be limited to, the following:

- A desk review of relevant information on the status of implementation activities
- A brief analysis of the social and political context
- A review of all relevant activity documentation—including data, indicator reporting, and narrative reports
- Site visits to selected states (Chihuahua, Coahuila, Nuevo Leon, and Sonora)
- Key informant interviews

The selection of interviewees should reflect the range of beneficiaries, counterparts, and other relevant stakeholders engaged in OIT portfolio activities. As such, the evaluation team shall include in data collection a selection of interviewees to be drawn from among the following, as appropriate to the specific data required to answer a question: (1) government officials from relevant institutions such as the Ministry of Public Administration (MPA), National Institute for Transparency (INAI), Audit Institutions, and the Executive Secretariat of the SNA (SESNA) among others, as well as state-level government officials who have engaged in USAID programming; (2) members of civil society from institutions such as the CPCs at the national and state level; (3) civil society counterparts (including USAID implementing partners) such as *Mexicanos Contra Mexicanos Unidos Contra la Corrupción y la Impunidad* (MCCI), *Mexico Evalua*, *Transparencia Mexicana*, *Instituto Mexicano para la Competitividad* (IMCO), *Ethos*, and *Mexico Evalúa* among others; (4) members of International Organizations (including USAID implementing partners) and Diplomatic Missions, such as United Nations Development Programme (UNDP), World Bank (WB), United Nations Office on Drugs and Crime (UNODC), Organization for Economic Cooperation and Development (OECD), the British Embassy in Mexico, and the German Cooperation Institute (GIZ), among others.

The team will have access to all relevant activity documents, including but not limited to:

- The original contract and/or agreement and subsequent modifications
- Annual and quarterly reports, work plans, and management reviews
- Technical reports and analyses, training materials, and related content
- Relevant activity data developed as part of routine monitoring including indicator information

- Relevant supporting documentation

Below is an illustrative evaluation design matrix to organize data collection efforts.

**Table 8. Evaluation Design Matrix**

| Evaluation Questions<br>Sub-Questions                                                   | Proposed Data Sources                                                                                                                 | Proposed Data<br>Collection Methods                                                                                      | Proposed Data<br>Analysis                                                                                  |
|-----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| <i>[Insert Evaluation questions and sub-questions—insert rows as needed]</i>            | <i>[Performance monitoring data, reports, other evaluations, etc.; national statistics; IP staff, stakeholders, beneficiaries...]</i> | <i>[Desk review, document review, Key informant interviews, surveys, focus group discussions, direct observation...]</i> | <i>[Thematic analysis, descriptive quantitative analysis, descriptive analysis of qualitative data...]</i> |
| 1.a. How effective is USAID’s approach to promoting implementation of SNA?              |                                                                                                                                       |                                                                                                                          |                                                                                                            |
| 1.b. What external constraints, if any, have impacted USAID’s engagement on this issue? |                                                                                                                                       |                                                                                                                          |                                                                                                            |
| <i>[continue with evaluation questions and sub-questions—insert rows as needed]</i>     |                                                                                                                                       |                                                                                                                          |                                                                                                            |

### Deliverables and Reporting Requirements

The Contractor shall provide the following deliverables to USAID:

- **In-briefing:** Once the team is completed, the evaluation team will meet with USAID officials for introductions and to discuss the team’s understanding of the assignment, initial assumptions, EQs, methodology, and work plan, and/or adjust the Scope of Work (SOW), if necessary.
- **Inception Report:** Due within 10 business days of evaluation implementation. It should be 10 pages maximum and must include the following:
  - A. Evaluation schedule, including logistical arrangements, locations, data collection efforts
  - B. Members of the Evaluation team, delineated by roles and responsibilities
  - C. Detailed Evaluation design and methods (Evaluation Design Matrix)
  - D. Data Collection Plan identifying data to be collected, including a precise explanation of data collection methods that will be used for each data need and source contributing to the EQ

- E. Sampling Plan (i.e., selection criteria of individuals and groups identified for interviews or discussions)
  - F. Proposed list of key informants and focus group participants
  - G. Data collection tools
  - H. Detailed data analysis plan
  - I. Detailed Evaluation schedule and logistics, including debriefing with USAID
- **Final Exit Briefing:** Due on the 45th business day of the evaluation implementation, the Contractor will provide an oral exit briefing presenting the team’s preliminary findings and recommendations in English and/or Spanish.
- **Draft Evaluation Report:** The Contractor will present a draft report in English of its findings and recommendations to USAID within 55 working days from the proposed evaluation end date. The draft report will be no more than 30 pages (Arial font and 11 font size) excluding appendices. The report will include the following:
  - A. Field Visit Report—a report outlining field visit activities.
  - B. Evaluation of Data and Analysis Files—All raw data generated as part of the evaluation should be submitted no later than one week after data collection activities are completed. All files generated as part of the data analysis should also be included as part of the “Evaluation Report.”
- **Final Presentation:** The evaluation team is expected to hold a final presentation (tentative date TBD) in person to discuss the summary of findings and conclusions (and recommendations, if applicable) with USAID. This presentation will be scheduled as agreed upon during the in-briefing.
- **Final report:** The final report will be provided in **English** to USAID in electronic format in MS Word and Adobe PDF within 65 working days following receipt of comments by USAID (date TBD). The final report must address the two tasks outlined above in the order of the Contractor’s choosing. The final report must also include an executive summary and not exceed 40 pages (excluding appendices). Appendices should, at a minimum, include the scope of work for the evaluation and a list of individuals and their positions/organizations interviewed/included in the evaluation. The final report must follow [USAID branding guidelines](#).
- **Translation to Spanish.** A translated version of the Final and approved Evaluation Report will be provided for dissemination to local stakeholders.
- **Submission of Dataset(s) to the Development Data Library:** Per USAID’s Open Data policy (see [ADS 579, USAID Development Data](#)) the contractor must also submit to the COR and the Development Data Library (DDL), at [www.usaid.gov/data](http://www.usaid.gov/data), in a machine-readable, non-proprietary format, a copy of any data set created or obtained in the performance of this award, if applicable. The data set should be organized and documented for use by those not fully familiar with the intervention or evaluation. Please review [ADS 579.3.2.2 Types of Data to Be Submitted to the DDL](#) to determine applicability.
- **Submission of Final Evaluation Report to the Development Experience Clearinghouse:** Per USAID policy ([ADS 201.3.5.18](#)) the contractor must submit the evaluation final report and its summary or summaries to the [Development Experience Clearinghouse](#) (DEC) within three months of final approval by USAID.

## Evaluation Team Composition

The Evaluation will require a team of four experts, including the following individuals:

1. A social scientist/team leader with a Ph.D. or master's degree in sociology, anthropology, political science, economics, or a related field. This expert must have a minimum of five years post-degree experience analyzing and evaluating Transparency and Integrity issues in Mexico. Also, he or she must have good contacts within Mexico's government, non-governmental organizations, international donors, and the private sector. Excellent English-language writing skills are required. Knowledge about USAID programming policy is desirable. Proven experience coordinating Evaluations and leading teams. Computer skills in word processing and spreadsheets are necessary. The scientist/team leader will also manage the preparation and presentation of the work plan and finalize the division of responsibilities among team members. The team leader will be responsible for the delivery of the Evaluation.
2. Evaluators (2): Both evaluators must possess at least a bachelor's degree (master's is desirable) in sociology, anthropology, political science, economics, or a related field. Minimum 5 years of experience in the design and development of Program Evaluations in governance-related activities. Good knowledge of Mexico's government agencies, non-governmental organizations, and international donors. A complementary expertise on different geographical areas of the country is also required. Excellent English-language writing skills are required.
3. Data Analyst: Bachelor's degree in computer science or related area. Master's degree is desirable. A minimum of three years' experience as a data analyst or in a related field. Ability to analyze existing tools and databases and provide solution recommendations. Ability to translate evaluation findings into nontechnical, lay terms. High-level experience in methodologies and processes for managing large-scale databases. Demonstrated experience in handling large data sets and relational databases. Understanding of addressing and metadata standards. High-level written and verbal communication skills.

**Table 9. Estimated LOE in Days by Position for a Team of Four**

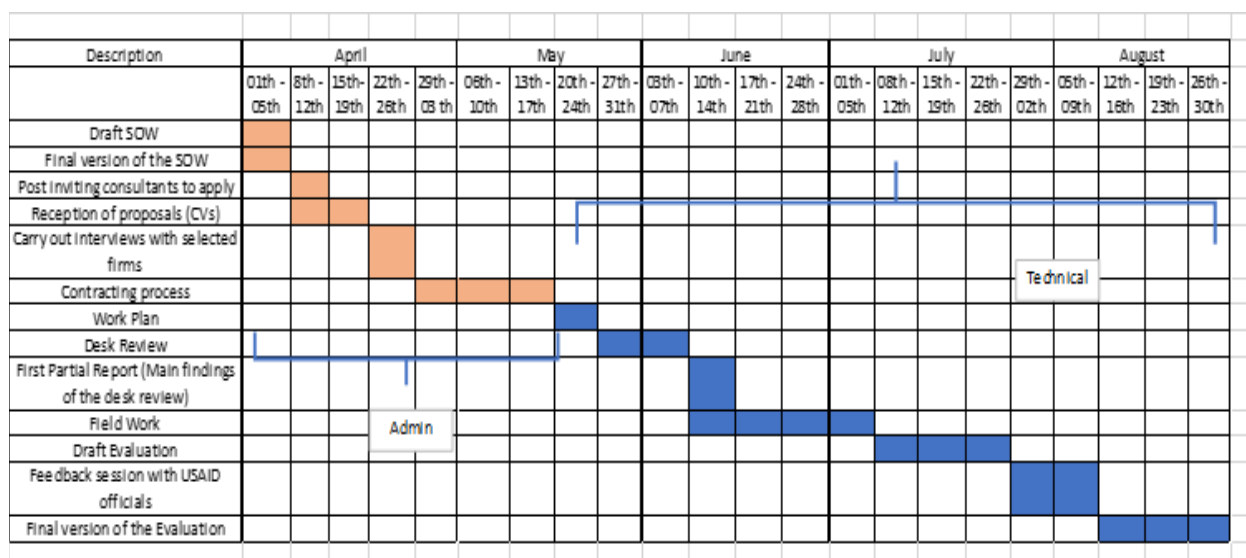
|                   | Task                                                                                              | LOE for Team Leader<br>100 Days | LOE for 2 Evaluators<br>100 Days | LOE for Data Analyst<br>100 Days | Total LOE in Days |
|-------------------|---------------------------------------------------------------------------------------------------|---------------------------------|----------------------------------|----------------------------------|-------------------|
| Preparation Phase | Document review/desk review/work planning and evaluation design drafting                          | 20                              | 40                               | 20                               | 80                |
|                   | Preparations for travel and organizing data collection (contracting translators, vehicles, etc.). | 3                               | 6                                | 3                                | 12                |
|                   | In-brief, evaluation design finalization (including meetings with USAID)                          | 6                               | 12                               | 6                                | 24                |
|                   | Preparations for data collection (scheduling)                                                     | 3                               | 6                                | 3                                | 12                |

|                      | Task                                                                              | LOE for Team Leader<br>100 Days | LOE for 2 Evaluators<br>100 Days | LOE for Data Analyst<br>100 Days | Total LOE in Days |
|----------------------|-----------------------------------------------------------------------------------|---------------------------------|----------------------------------|----------------------------------|-------------------|
| Field Work Phase     | Data collection days by method by site                                            | 17                              | 34                               | 17                               | 68                |
|                      | Data analysis                                                                     | 20                              | 40                               | 20                               | 80                |
|                      | Briefing                                                                          | 3                               | 6                                | 3                                | 12                |
| Report Writing Phase | Recommendations (oral presentation with supporting info/slides)                   | 3                               | 6                                | 3                                | 12                |
|                      | Draft report and debrief to USAID (including any applicable time for translation) | 15                              | 30                               | 15                               | 60                |
|                      | Final report                                                                      | 10                              | 20                               | 10                               | 40                |
|                      | <b>Total</b>                                                                      | <b>100</b>                      | <b>200</b>                       | <b>100</b>                       | <b>400</b>        |

## Evaluation Schedule

The below evaluation schedule is illustrative and will be updated in collaboration with USAID before the finalization of the work plan.

**Figure 3. Evaluation Schedule**



## **Final Report Format**

The draft and final evaluation reports should be submitted using the Evaluation Report Template (<https://usaidlearninglab.org/library/evaluation-report-template>) and must comply with USAID Evaluation Report Requirements (<https://www.usaid.gov/ads/policy/200/201mah>).

## **Modifications to the Statement of Work**

Following discussions with USAID and after getting their comments on the Inception Report, the initial evaluation objectives were revised, and new ones developed based on USAID's needs. Details on the changes made are found in the following table:

**Table 10. Modifications to Evaluation Questions and Objectives**

| Section in SOW           | SOW                                                                                                                                                                                                                                                                                      | Inception and Final Reports                                                                                                                                                                                                                                                      |
|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IV. Evaluation Questions | EQ1: How effective is USAID’s approach to promoting the implementation of SNA? What external constraints, if any, have impacted USAID’s engagement on this issue?                                                                                                                        | <b>Objective 1a.</b> In light of the performance of the eight activities to be reviewed, how effective have USAID’s programs been in promoting anti-corruption reforms?                                                                                                          |
|                          |                                                                                                                                                                                                                                                                                          | <b>Objective 1b.</b> In light of the performance of the eight activities to be reviewed, identify external constraints that have impacted USAID’s engagement on this issue.                                                                                                      |
| IV. Evaluation Questions | EQ2: How well does external pressure from civil society organizations (CSOs), media outlets, and citizen participation improve accountability and transparency? How effective or efficient is external pressure compared to internal reforms within judicial and political institutions? | <b>Objective 2a.</b> In light of the experience of the eight activities to be reviewed, assess how well external pressure from civil society organizations (CSOs), media outlets, and citizen participation improves accountability and transparency. <sup>20</sup>              |
|                          |                                                                                                                                                                                                                                                                                          | <b>Objective 2b.</b> In light of the experience of the eight activities to be reviewed, assess how effective is external pressure compared to internal reforms within judicial and political institutions. <sup>21</sup>                                                         |
|                          |                                                                                                                                                                                                                                                                                          | <b>Sub-objective 2b.1.</b> Identify the push/pull between the external pressure and internal reforms, e.g., how and where they have either supported or contradicted each other, with a view toward understanding the context in which external pressure can be most successful. |

<sup>20</sup> Because each activity has its own theory of change, mechanisms, and approaches, the team will not constrain the analysis of transparency and accountability to a concrete definition but will assess the ways in which the different activities contributed to these objectives. Also transparency and accountability are distinct concepts and should be measured separately. Definitions will be determined as indicated in each activities’ work plan or scope of work.

<sup>21</sup> To better address Objective 2, the team will first assess whether external and/or internal pressure variables are significant for achieving the outcomes, and then, in light of the eight activities, the team will try to assess the relationship between external and internal pressure.

| Section in SOW                 | SOW                                                                                                                                                                                       | Inception and Final Reports                                                                                                                                                                                                                                                                                  |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IV.<br>Evaluation<br>Questions | EQ3: How can international donors best support local reform efforts? What specific modalities of engagement have yielded results in advancing state and national anti-corruption systems? | <b>Objective 3a.</b> In light of the experience of the eight activities to be reviewed, identify advisable ways in which international donors can support local reform efforts.                                                                                                                              |
|                                |                                                                                                                                                                                           | <b>Objective 3b.</b> In light of the experience of the eight activities to be reviewed, determine the specific modalities of engagement that have yielded results in advancing state and national anti-corruption systems.                                                                                   |
|                                |                                                                                                                                                                                           | <b>Sub-objective 3b.1.</b> According to the beneficiaries and other stakeholders involved in the activities to be assessed, determine which implementation approaches have proved the most effective in building the technical and institutional capability of state governments in anti-corruption efforts. |
|                                |                                                                                                                                                                                           | <b>Sub-objective 3b.2.</b> Identify evidence of “ownership” by local actors of anti-corruption reforms in target states, thereby contributing to their sustainability.                                                                                                                                       |

## ANNEX II: EVALUATION METHODS AND LIMITATIONS

The principal methodology utilized to guide the data collection and analysis was Most Significant Change (MSC), a qualitative evaluation method focused on program improvement. Rather than selecting predetermined indicators, MSC encourages informants to identify significant activity outcomes (positive and negative, expected and unexpected), alternative causes and allows them to assess the implemented strategies. This evaluation takes the Earl, Carden, and Smutylo (1971) concept of “outcome,” which moves away from more problematic concepts (such as impact) to identify results in terms of performance and recognizes contributions made by multiple actors. Correctly, the outcome is understood as changes in behavior, relationships, actions, and activities in the people, groups, and organizations it works with directly. The team reviewed available indicators from the activities under evaluation, but the methodology is mainly qualitative.

To address potential shortcomings of MSC—purposive sampling, the bias in favor of success stories, and authenticity—lessons learned and “bad news” were formally incorporated in the collection of information and deliberation process. MSC was also complemented by three additional conceptual tools. The team reviewed available indicators from the activities under evaluation, but the methodology is mainly qualitative. Secondly, MSC was complemented with the Mintzberg and Jørgensen (1995) Conceptual Framework to shed light on what the activities intended to implement and what was actually executed. Finally, to better address EQ3, the team generated plausible scenarios to develop specific strategies with a better probability of effectiveness in promoting anti-corruption reforms in the future.

To better address the evaluation purposes, the methodology involved two levels of analysis: first, a performance evaluation of the eight activities to identify planned versus actual outcomes for each activity; and second, a cross-cutting analysis of the main findings to answer the EQs and sub-questions, draw conclusions, and make recommendations for USAID.

In carrying out the performance evaluation by activity, ICME articulated a Theory of Change for each one, based on the activities’ documents and interviews, and identified potential external and internal risks. Activities were also assessed in terms of their alignment to USAID’s Transparency and Integrity Portfolio framework results (USAID Country Development Cooperation Strategy FY2014–FY2018, Approved April 2014 with addendum as of November 2015), and to what extent each activity utilized Local Systems Framework, mainly in terms of the 5Rs (Resources, Roles, Relationships, Rules, and Results) (USAID 2014). The analysis then moves forward to assess intended versus implemented activities and benchmarks, and identifies the main challenges, lessons learned, sustainability, and recommendations put forward by key informants and ICME team. Finally, based on these findings, a comparative analysis was performed in order to address the EQs and their corresponding objectives, as set out in the SOW.

In order to address validity and reliability concerns through methodological triangulation, collection methods ranged from document review to semi-structured interviews and group discussions (when relevant). Initial data collection was based on documentary evidence provided mainly by USAID and Implementing Partners. It is worth mentioning that documentation provided differed greatly in quantity and quality, which affected the analysis produced for each activity.

The key informants list was integrated following suggestions from USAID, ICME, and IPs as well as snowballing on suggestions from the contacted informants. The final list was approved by USAID’s office. Also, the saturation principle was followed. Interviews included those informants identified in the SOW in Mexico City and the states of Coahuila, Chihuahua, Sonora, and Nuevo Leon (the selection of states to visit was determined by the SOW). Desk review and fieldwork activities took place from July to October 2019, including the visits to the states, where the team split into two sub-teams from August 20 to September 3, 2019.

In total, the team reviewed 154 documents, held two workshops with a total of 40 participants from the GOM, and conducted 122 interviews with the following breakdown: 56 females, 66 males, two USAID staff, 20 Implementing Partners, 41 people from civil society, 45 GOM officials, five subcontractors, three actors from the private sector, four beneficiaries and two from an international agency. The information collected through interviews is referenced with a number preceded with the letter “C” (for “code”).

The main limitations of the evaluation are as follows:

1. Available documentation differed greatly by activity, affecting the level of analysis.
2. Particularly for IMCO’s Alliance for Integrity activity, conclusions are limited because most of the work is in its early stages and no intermediate deliverables were available to determine progress.
3. The ICME team intended to broaden the list of current GOM officials to conduct interviews and to inquire into their perspectives on current needs but received no response. As a result, the ICME team had to rely more on public sources.
4. As established in the SOW, this is a performance evaluation. Hence, the team did not evaluate the impact of these activities.
5. Given the size of the sample and the diversity of the activities, all findings and conclusions stated in this document concern only the eight activities evaluated and should not be generalized. Findings and conclusions only apply to those aspects that are similar to the set of the cases analyzed in this study.

## ANNEX III: DATA COLLECTION INSTRUMENTS

### IMPLEMENTING PARTNERS INTERVIEW GUIDELINE

Activity:

Implementing Partner:

Date and Hour:

#### Introduction

Hello, *interviewee's name*. My name is *my name*, and my colleague is my *colleague's name*. We highly appreciate your willingness to participate in this research. The purpose of this interview is to learn about your experiences and views on the activity *Name of the activity* to understand its evolution, results, and possible ways forward to advancing anti-corruption systems in Mexico. The interview will take between 45 minutes to one hour. Your personal information and responses will not be associated with you in the final report or anywhere else.

Finally, we would like to record this interview to facilitate data processing. Do you agree?

- *Notes in italics are for the interviewer's reference.*
- *All questions are open.*

#### **SECTION 1. Personal Information**

- Name \_\_\_\_\_
- Title/role \_\_\_\_\_
- Organization \_\_\_\_\_
- Geographic locations of the activities in Mexico \_\_\_\_\_
- Time working or previous experience with transparency, open government, or anti-corruption initiatives \_\_\_\_\_

0. Please, tell me about your background and how you got involved in the organization or this USAID supported activity.

#### **SECTION 2. Activity Information**

1. What were your activities and responsibilities in this activity?
- 2.a. How does [Implementing Partner] understand corruption? Does that conceptualization differ from USAID's understanding of the phenomenon?
- 2.b. How did the activity intend to contribute to addressing the problem?
- 3.a. Did the activity suffer any changes with respect to the original design?
- 3.b. If so, which ones and what was the rationale behind these changes?

#### **SECTION 3: Most Significant Changes**

4.a. If you could pick one story that reflects the most significant change achieved by the activities, which one would be? These can be intended or unintended.

*(Changes can be related to behavior, knowledge, participation, interrelations, activities, or policies.)*

4.b. Why do you think it is one of the most significant changes?

5.a. Which were the key factors that enabled those changes to occur?

5.b. Which were the main problems or obstacles faced?

6. Were there any unforeseen or unexpected effects (positive or negative) derived from the activity?

7. Could you mention three lessons learned from the activity?

#### **SECTION 4: Final Beneficiaries**

8.a. If the activity has not finished: In your view, are the beneficiaries of the activity better equipped to continue advancing anti-corruption measures once the activity finishes? Provide concrete examples.

8.b. If the activity has finished: Did the beneficiaries of the activity continue advancing anti-corruption measures after the activity finished? Provide concrete examples.

#### **SECTION 5: USAID Support**

9.a. How would you assess your collaboration with USAID in this activity? Which were the main positive aspects of the interaction? Which are the aspects that can be improved?

9.b. How would you assess USAID's approach to fight corruption?

9.c. Has the activity developed synergies with other USAID activities?

10. In your opinion, what would be the main trends and processes (both positive and negative) that may affect anti-corruption efforts at the local and federal levels?

11. In your view, what would be the best way for USAID to engage and contribute to advancing anti-corruption efforts in Mexico?

## **SECTION 6: Additional Information**

12. Are there any further documents or information that you could provide to help us with the evaluation?

13. Could you recommend us additional informants to ask for an interview?

14. Before we finish, is there anything else you would like to add?

Thank you very much for your time.

## **WORKSHOPS – EVALUATION OF THE PUBLIC ETHICS CONSOLIDATION PROGRAM**

### **General Objective**

To understand how the final beneficiaries assess the Public Ethics Consolidation (PEC) program, and to determine the most significant changes achieved using this program tools. (Duration: 3.5 hours.)

**Table 11. Agenda of Workshops**

| <b>WORKSHOPS – EVALUATION OF THE PUBLIC ETHICS CONSOLIDATION PROGRAM</b> |                                                                                                                                                              |                                                                                                   |
|--------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| <b>Time</b>                                                              | <b>Activity</b>                                                                                                                                              | <b>Technique</b>                                                                                  |
| 10:00 – 10:15                                                            | <ul style="list-style-type: none"><li>• Welcome words</li><li>• Presentation of the participants</li><li>• Presentation of the workshop’s dynamics</li></ul> | <ul style="list-style-type: none"><li>• Presentation</li></ul>                                    |
| 10:15 – 10:25                                                            | <ul style="list-style-type: none"><li>• Presentation of the components and activities of the activity</li></ul>                                              | <ul style="list-style-type: none"><li>• Presentation</li></ul>                                    |
| 10:25 – 10:35                                                            | <ul style="list-style-type: none"><li>• Level of satisfaction with the training and the Ethical Decision Exercises System (SEDE) tool</li></ul>              | <ul style="list-style-type: none"><li>• Online survey</li></ul>                                   |
| 10:35 – 11:30                                                            | <ul style="list-style-type: none"><li>• Most significant changes after the training and the SEDE tool</li></ul>                                              | <ul style="list-style-type: none"><li>• Teamwork (five people on each team)</li></ul>             |
| 11:30 – 11:45                                                            | <ul style="list-style-type: none"><li>• Coffee break</li></ul>                                                                                               |                                                                                                   |
| 11:45 – 12:45                                                            | <ul style="list-style-type: none"><li>• Plenary discussion about the most significant changes identified in the previous exercise</li></ul>                  | <ul style="list-style-type: none"><li>• Presentation (one representative for each team)</li></ul> |
| 12:45 – 13:10                                                            | <ul style="list-style-type: none"><li>• Individual activity. The most significant change of the SAADD tool</li></ul>                                         | <ul style="list-style-type: none"><li>• Individual written response</li></ul>                     |
| 13:10 – 13:20                                                            | <ul style="list-style-type: none"><li>• Closure of the workshop</li></ul>                                                                                    |                                                                                                   |

## **Selection of Participating Public Officials**

To secure the diversity of the participating public officials, the evaluation team designed a selection mechanism for these workshops. First, the evaluation team asked the counterpart for the lists of the public officials trained for the use of the SEDE and SAADD platforms. Then, the evaluation team assigned a number to each trained public official, based on their position on the list. After that, these numbers (no names, no personal data) were fed to a randomizer application, which generated a new order of the assigned numbers. The first 20 assigned numbers were selected to participate in the workshops, and 10 as backups.

### **Part 1 – Welcome words, presentation of the participants, and presentation of the workshop’s dynamics**

*Objective:* To welcome participants and thank them for their attendance at the workshop.

*Procedure:*

- a. The facilitators and hosts offer welcome words to the participants, explaining the reasons and the objective of the evaluation. Each member of the evaluation team also introduces themselves.
- b. Participants introduce themselves, specifying their name and role in the organization.
- c. The facilitator explains the workshop’s methodology and the activities. Afterwards, the facilitator shares some ground rules.

*Materials:* The presentation

*Duration:* 15 minutes (10:00–10:15)

### **Part 2 – Presentation of the components and activities of the activity**

*Objective:* To remind the participating public officials about the activities of the activity, those relevant for them as beneficiaries.

*Procedure:*

- a. The facilitator presents a description of the objectives and activities of the activity to assess.
- b. The facilitator reminds the induction training received by these public officials and also explains what the SEDE and SAADD tools are.

*Materials:* The presentation

*Duration:* 10 minutes (10:15–10:25)

### **Part 3 – Online survey about the activity and its tools**

*Objective:* To determine the level of satisfaction of the final beneficiaries about the Public Ethics Consolidation Program (PEC) tools.

*Procedure:*

- A link is shared with the participants, who access it using their smartphones. They answer four questions on a scale from 1 to 5.
  - a. What is your level of satisfaction with the induction training?  
1 = not satisfied / 5 = totally satisfied

- b. Was the content of the induction training useful?

1 = not useful / 5 = totally useful

- c. Is the SEDE platform easy to use?

1 = it is complicated / 5 = it is easy

- d. Did the SEDE exercises help you to solve ethical dilemmas in your job?

1 = no, they didn't help / 5 = yes, they helped

*Materials:* The presentation

*Duration:* 10 minutes (10:25–10:35)

#### **Part 4 – Most significant changes**

*Objective:* To identify stories reflecting the most significant changes, achieved after the induction training and the SEDE tool.

*Procedure:*

- a. The facilitator randomly divides the participants into five groups, assigning the roles of one facilitator and one clerk.
- b. The participants have to perform the following task using white cards:

**Write a brief story that reflects or is representative of the most significant or important change generated after the induction training and the use of the SEDE platform. This change could be related to your working area or your peers. These changes can be both desired and unplanned.**

- a. Individually, the participants write their responses. It takes 10 minutes.
- b. After they write their responses, the participants share their answers with the rest of the group. It takes three to five minutes.
- c. Each group begins a discussion considering the following elements:  
  
Are there any similarities in the stories written?  
  
Which stories stand out? Consider their importance.  
  
Which stories or results match with the objectives or expected results of the activity?
- d. After this discussion, every team selects one or two stories that reflect the most significant changes or results achieved by the activity.
- e. These stories are summarized on the white cards.

*Materials:* White cards, pencils

*Duration:* 55 minutes (10:35–11:30)

#### **Coffee break – 15 minutes**

#### **Part 5 – Plenary discussion about the most significant changes identified in the previous exercise.**

*Objective:* To identify frequent most significant changes, identified in the previous exercise

*Procedure:*

- a. The facilitator of each group presents the results of that team.
- b. The evaluation team collects the white cards.
- c. The stories are grouped according to their similarity.
- d. Once the stories are grouped, the participants debate which stories are more frequent or more important.
- e. This plenary discussion finishes with a conclusion regarding the most significant changes, and the debate around these.

*Materials:* presentation, tables for 20 people, flipcharts, markers, moderation guidelines, table identifiers (numbers), white cards, white sheets, pencils

*Duration:* 60 minutes (11:45–12:45)

## **Part 6 – The most significant change of the SAADD platform**

*Objective:* To discover the most significant changes as a consequence of the SAADD platform. Considering this platform is about doubts and claims regarding unethical behaviors, the evaluation team determined that the best way to get responses is by asking for confidential individual answers.

*Procedure:*

- a. The facilitator provides white cards to each participant. The evaluation team asks the participants to write about the most significant change from the use of the SAADD platform.
- b. Public officials write their responses on the white cards, anonymously. They put their answers in an envelope
- c. Facilitators collect envelopes.

*Materials:* The presentation, tables for 20 people, flipcharts, markers, moderation guidelines, table identifiers (numbers), white cards, white sheets, pencils

*Duration:* 25 minutes (12:45–13:10)

## **Part 7 – Closure of the workshop**

*Objective:* To offer closure to the workshop.

*Procedure:*

- a. The facilitator thanks the public officials for their attendance, asking if there is anything they want to add.
- b. The activity is finished.

*Materials:* The presentation

*Duration:* 25 minutes (13:10–13:20)

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**Table 12. List of Informants**

|    | Name                     | Job Title                                                                       | Activity           | State      | Interview | Sector         |
|----|--------------------------|---------------------------------------------------------------------------------|--------------------|------------|-----------|----------------|
| 1  | Aarón Grageda Bustamante | Former President, CPC Sonora                                                    | Checchi            | Sonora     | Done      | Civil Society  |
| 2  | Abdeel Martínez          | Coordinator, Comptroller, and Government Transparency Secretariat in Nuevo León | Checchi            | Nuevo León | Done      | GOM            |
| 3  | Adrián Pascacio Martínez | Former Head of Regional Operation and Social Audit Unit of the MPA              | World Bank         | CDMX       | Done      | GOM            |
| 4  | Adrián Santos            | Former Multi-Stakeholder Dialogue Specialist, UNDP                              | UNDP               | UK         | Done      | IP             |
| 5  | Alejandra Ramírez        | Transparency and Corruption Specialist, Checchi                                 | Checchi            | CDMX       | Done      | IP             |
| 6  | Alejandra Rascón         | Former Head of International Cooperation Unit, MPA                              | Checchi/World Bank | Chihuahua  | Done      | GOM            |
| 7  | Alejandra Wade           | Head of Consejo Cívico de las Instituciones de Coahuila                         | ICMA               | Coahuila   | Done      | Civil Society  |
| 8  | Alejandro Maza           | General Director, OPI                                                           | MEPP               | CDMX       | Done      | Sub-contractor |
| 9  | Alexandra Zapata         | Deputy General Manager, IMCO                                                    | IMCO               | CDMX       | Done      | IP             |
| 10 | Alfonso Hernández        | Member of the local CPC, Jalisco                                                | World Bank         | Jalisco    | Done      | Civil Society  |

|    | Name                 | Job Title                                              | Activity     | State      | Interview | Sector        |
|----|----------------------|--------------------------------------------------------|--------------|------------|-----------|---------------|
| 11 | Amparo Menchaca      | Anti-Corruption Manager, CCINL                         | CCINL        | Nuevo León | Done      | Civil Society |
| 12 | Amparo Rodríguez     | Open Government Coordinator, MPA Chihuahua             | IMCO         | Chihuahua  | Done      | GOM           |
| 13 | Ana Ogarrio          | Senior Activities Manager, Abt Associates              | MEPP         | CDMX       | Done      | Private       |
| 14 | Ana Petersen         | Deputy Director, ICMA                                  | ICMA         | Jalisco    | Done      | IP            |
| 15 | Ana Porras           | President, Participación Ciudadana 29                  | Checchi      | Coahuila   | Done      | Civil Society |
| 16 | Ana Yuri Solís       | President, CPC Coahuila                                | Checchi/ICMA | Coahuila   | Done      | Civil Society |
| 17 | Armando Plata        | Head, Superior Audit of Coahuila State (ASEC)          | ICMA         | Coahuila   | Done      | GOM           |
| 18 | Armando Rodríguez    | Comptroller Officer, Municipality of San Nicolás Garza | ICMA         | Nuevo León | Done      | GOM           |
| 19 | Arturo Piñeiro       | Law Researcher, IMCO                                   | IMCO         | CDMX       | Done      | IP            |
| 20 | Aura Martinez        | Former Analysis Director of Budget Performance, SHCP   | MEPP         | CDMX       | Done      | GOM           |
| 21 | Aurora Figueroa Lara | Legal Compliance Specialist, PEMEX                     | MEPP         | CDMX       | Done      | GOM           |
| 22 | Beatriz Camacho      | President, Ciudadanos contra la Corrupción             | Checchi      | Nuevo León | Done      | Civil Society |
| 23 | Boris Cuapio         | Founder, Gobierno Fácil                                | UNDP         | Puebla     | Done      | Civil Society |

|    | Name                   | Job Title                                                                                 | Activity             | State      | Interview | Sector                     |
|----|------------------------|-------------------------------------------------------------------------------------------|----------------------|------------|-----------|----------------------------|
| 24 | Brenda Govea           | Executive Assistant, Red para la Participación Ciudadana de Chihuahua                     | ICMA                 | Chihuahua  | Done      | Civil Society              |
| 25 | Carla Juárez           | UK Foreign and Commonwealth Office                                                        | Prospective analysis | CDMX       | Done      | International Organization |
| 26 | Carlos Silva Hernández | Legal Compliance Sub-manager, PEMEX                                                       | MEPP                 | CDMX       | Done      | GOM                        |
| 27 | Carlos Tinoco          | Administrative Director, DIF Chihuahua                                                    | ICMA                 | Chihuahua  | Done      | GOM                        |
| 28 | Carmen Álvarez         | Local open government facilitator in the Technical Anti-corruption Secretariat, Chihuahua | UNDP                 | Chihuahua  | Done      | Civil Society              |
| 29 | Claudia González       | Internal Affairs Coordinator, Municipality of San Nicolas Garza                           | ICMA                 | Nuevo León | Done      | GOM                        |
| 30 | Claudia Orduño         | Vinculation Director, Institute of Audit and Supervision                                  | Checchi              | Sonora     | Done      | GOM                        |
| 31 | Cynthia Coronado       | Fellow UNDP Open Government Program                                                       | UNDP                 | Sonora     | Done      | Beneficiary                |
| 32 | Daniela Castillo       | Social Responsibility Leader, Promax                                                      | CCINL                | Nuevo León | Done      | Private Company            |
| 33 | Dante Preisser         | Former Head of the Linking Unit with the National Anti-                                   | MEPP                 | CDMX       | Done      | GOM                        |

|    | Name                    | Job Title                                                        | Activity              | State      | Interview | Sector         |
|----|-------------------------|------------------------------------------------------------------|-----------------------|------------|-----------|----------------|
|    |                         | Corruption System, MPA                                           |                       |            |           |                |
| 34 | Diana Ramos             | Vinculation Manager, Consejo Civico                              | CCINL                 | Nuevo León | Done      | Civil Society  |
| 35 | Edna Patricia de Romero | Final beneficiary from the Mining Trust Fund activities          | World Bank            | Sonora     | Done      | Beneficiary    |
| 36 | Eduardo Bohorquez       | General Director, <i>Transparencia Mexicana</i>                  | World Bank/IMCO/ MEPP | CDMX       | Done      | Civil Society  |
| 37 | Eduardo Flores          | COP USAID's Transparency Rapid Response Activities, Checchi      | Checchi               | CDMX       | Done      | IP             |
| 38 | Emily Schmidt           | M&E specialist, Checchi                                          | Checchi               | CDMX       | Done      | IP             |
| 39 | Erika García de León    | Organizational Culture Coordinator, San Pedro Garza Municipality | ICMA                  | Nuevo León | Done      | GOM            |
| 40 | Eugenio Santos          | Director of Human Resources, San Pedro Garza Municipality        | ICMA                  | Nuevo León | Done      | GOM            |
| 41 | Fernanda Avendaño       | Public Procurement Researcher, IMCO                              | IMCO                  | CDMX       | Done      | Civil Society  |
| 42 | Fernando Alcázar        | Former Alliance for Integrity Researcher, IMCO                   | IMCO                  | CDMX       | Done      | Civil Society  |
| 43 | Fernando Herrera        | Former Major of Cananea, Sonora                                  | World Bank            | Sonora     | Done      | GOM            |
| 44 | Fernando Nieto          | Associate Professor of Public Administration, COLMEX             | MEPP                  | CDMX       | Done      | Sub-contractor |

|    | Name                     | Job Title                                                              | Activity   | State           | Interview | Sector                     |
|----|--------------------------|------------------------------------------------------------------------|------------|-----------------|-----------|----------------------------|
| 45 | Fernando Vera            | CEO Lumit, IMCO's Subcontractor                                        | IMCO       | CDMX            | Done      | Sub-contractor             |
| 46 | Francisco Lelo de Larrea | Under Director of Economic Analysis, CEESP                             | MEPP       | CDMX            | Done      | Civil Society              |
| 47 | Francisco Martínez       | Director, Tierra Colectiva                                             | UNDP       | Baja California | Done      | Civil Society              |
| 48 | Francisco Parra Ibarra   | Special Activities Director, CONAMER                                   | MEPP       | CDMX            | Done      | GOM                        |
| 49 | Gabriel Orduña           | Former National Digital Platform Coordinator, MPA                      | MEPP       | CDMX            | Done      | GOM                        |
| 50 | Gabriel Aguirre          | Internal Control Officer, DIF Chihuahua                                | ICMA       | Chihuahua       | Done      | GOM                        |
| 51 | Gabriela Gómez Montañó   | Transparency Unit Coordinator, MPA Chihuahua                           | IMCO       | Chihuahua       | Done      | GOM                        |
| 52 | Giselle Morales Rivas    | Planning and Strategy Coordinator, Comptroller Secretariat at Escobedo | ICMA       | Nuevo León      | Done      | GOM                        |
| 53 | Guadalupe Mendoza        | Institutional Development Director, IMCO                               | IMCO       | CDMX            | Done      | Civil Society              |
| 54 | Guadalupe Toscano        | Public Sector Management Specialist, World Bank                        | World Bank | CDMX            | Done      | International Organization |
| 55 | Hector Romero            | Final beneficiary from the Mining Trust Fund activities                | World Bank | Sonora          | Done      | Beneficiary                |
| 56 | Hugo Osorio              | Founder, Gobierno Fácil                                                | UNDP       | Puebla          | Done      | Civil Society              |

|    | Name                | Job Title                                                                                       | Activity   | State     | Interview | Sector        |
|----|---------------------|-------------------------------------------------------------------------------------------------|------------|-----------|-----------|---------------|
| 57 | Isidro Cruz         | Transparency & Anti-Corruption Specialist, MSI                                                  | Checchi    | CDMX      | Done      | IP            |
| 58 | Ismael Camargo Mata | General technical director, Monitoring and Regulation of the National Transparency System, INAI | Checchi    | CDMX      | Done      | GOM           |
| 59 | Jaime Chávez Alor   | Former Head of the Ethics and Conflict of Interest Prevention Unit, MPA                         | World Bank | USA       | Done      | GOM           |
| 60 | Jair Araiza         | Program Manager, Regional Commission of Human Rights in Chihuahua                               | ICMA       | Chihuahua | Done      | GOM           |
| 61 | Javier Berain       | Former Deputy Director of Studies on Transparency and Accountability Policies, MPA              | MEPP       | CDMX      | Done      | GOM           |
| 62 | Javier González     | Democratic Governability Official, UNDP                                                         | UNDP       | CDMX      | Done      | IP            |
| 63 | Jazmín Alanis       | Control Units Coordinator, MPA Chihuahua                                                        | Checchi    | Chihuahua | Done      | GOM           |
| 64 | Jesús Alarcón       | Law Researcher, IMCO                                                                            | IMCO       | CDMX      | Done      | Civil Society |
| 65 | Jesus Barron        | Head of Internal Control, DIF Chihuahua                                                         | ICMA       | Chihuahua | Done      | GOM           |
| 66 | Jesús Flores Mier   | Special Prosecutor for Crimes for                                                               | Checchi    | Coahuila  | Done      | GOM           |

|    | Name                        | Job Title                                                                                                               | Activity                                | State      | Interview | Sector         |
|----|-----------------------------|-------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|------------|-----------|----------------|
|    |                             | Corruption, Specialized Anti-Corruption Prosecution Office                                                              |                                         |            |           |                |
| 67 | Jesús Robles Maloof         | Head of the Regional Operation and Social Comptroller Unit, MPA                                                         | World Bank/Perspective Analysis         | CDMX       | Done      | GOM            |
| 68 | Jimena Escalante            | Activities Coordinator, Consejo Cívico Nuevo León                                                                       | Checchi                                 | Nuevo León | Done      | Civil Society  |
| 69 | Jody Pollock                | Gender and Social Inclusion Lead, C230                                                                                  | Gender Perspective                      | CDMX       | Done      | Private        |
| 70 | Joel Salas                  | Commissioner and Coordinator of the Committee on Access to Information, Open Government and Transparency Policies, INAI | Prospective Analysis/Checchi/World Bank | CDMX       | Done      | GOM            |
| 71 | Jorge Andrés Castañeda      | Former Operations Director, OPI                                                                                         | MEPP                                    | CDMX       | Done      | Civil Society  |
| 72 | José Antonio Enríquez Taméz | Former President, CPC Chihuahua                                                                                         | Checchi                                 | Chihuahua  | Done      | Civil Society  |
| 73 | José Bautista               | Academic at ITESO, Specialist in Public Ethic                                                                           | ICMA                                    | Jalisco    | Done      | Sub-contractor |
| 74 | José Daniel Jiménez         | Special Activities Coordinator, CONAMER                                                                                 | MEPP                                    | CDMX       | Done      | GOM            |
| 75 | José Enrique Rodríguez      | General Director of the Mining Fund, SEDATU                                                                             | World Bank                              | Canada     | Done      | GOM            |

|    | Name                    | Job Title                                                                            | Activity             | State      | Interview | Sector        |
|----|-------------------------|--------------------------------------------------------------------------------------|----------------------|------------|-----------|---------------|
| 76 | José Luis Gil           | Integrity and Transparency Specialist, USAID                                         | USAID                | CDMX       | Done      | Funder        |
| 77 | José Octavio Acosta     | Civic Participation Specialist, ICMA                                                 | ICMA                 | CDMX       | Done      | Civil Society |
| 78 | Julio Cesar Acuña       | Final beneficiary from the mining trust fund activities                              | World Bank           | Sonora     | Done      | Beneficiary   |
| 79 | Larissa Esparza         | General Director of Legal Affairs, Specialized Anti-Corruption Prosecution Office    | Checchi              | Coahuila   | Done      | GOM           |
| 80 | Laura Lozano            | Head of Administration, San Pedro Garza Municipality                                 | ICMA                 | Nuevo León | Done      | GOM           |
| 81 | Leonor Ortíz Monasterio | Researcher for Applied Investigation, Mexicanos contra la Corrupción y la integridad | Prospective Analysis | CDMX       | Done      | Civil Society |
| 82 | Lorena Chapa            | Communications Manager, CCINL                                                        | CCINL                | Nuevo León | Done      | Civil Society |
| 83 | Lorena Rivero           | Former Deputy Director for Monitoring and Information of Budget Performance, SHCP    | MEPP                 | CDMX       | Done      | GOM           |
| 84 | Lourdes Bayona          | President, Mexico Solidaria                                                          | UNDP                 | Durango    | Done      | Civil Society |
| 85 | Luis Farias             | Program Manager, Superior Audit of Coahuila (ASEC)                                   | ICMA                 | Coahuila   | Done      | GOM           |

|    | Name                  | Job Title                                                                                         | Activity             | State      | Interview | Sector               |
|----|-----------------------|---------------------------------------------------------------------------------------------------|----------------------|------------|-----------|----------------------|
| 86 | Luis García Campuzano | Director, Ciudadanos Contra la Corrupción                                                         | Checchi              | Nuevo León | Done      | Civil Society        |
| 87 | Luis Oliver Torres    | President, CODECH/CODER                                                                           | IMCO                 | Chihuahua  | Done      | Civil Society        |
| 88 | Manuel Molano         | General Director, IMCO                                                                            | IMCO                 | CDMX       | Done      | Civil Society        |
| 89 | Manuel Silva          | Transparency and Corruption Specialist, Checchi                                                   | Checchi              | CDMX       | Done      | IP                   |
| 90 | Marco Fernández       | Anti-Corruption and Education Coordinator, México Evalúa                                          | IMCO                 | CDMX       | Done      | Civil Society        |
| 91 | Marco Pérez           | Alliance for Integrity Network Manager for Mexico and Colombia, GIZ                               | Prospective Analysis | CDMX       | Done      | International Agency |
| 92 | Marco Zamarripa       | General Director, Consejo Cívico de las Instituciones de la Laguna                                | Checchi              | Coahuila   | Done      | Civil Society        |
| 93 | María José Montiel    | Open Government Director, INAI                                                                    | UNDP                 | CDMX       | Done      | GOM                  |
| 94 | Mariana García        | Former Open Government Coordinator, UNDP                                                          | UNDP                 | CDMX       | Done      | IP                   |
| 95 | Maribel Corbera Salas | General Director of Procedures and Investigations, Specialized Anti-Corruption Prosecution Office | Checchi              | Coahuila   | Done      | GOM                  |
| 96 | Marieclaire Acosta    | Former Chairman of the Coordinating Committee of the                                              | Checchi              | CDMX       | Done      | Civil Society        |

|     | Name                    | Job Title                                                                                    | Activity     | State      | Interview | Sector        |
|-----|-------------------------|----------------------------------------------------------------------------------------------|--------------|------------|-----------|---------------|
|     |                         | National Anti-Corruption System                                                              |              |            |           |               |
| 97  | Miguel Francisco Crespo | Member, Ciudadanos Construyendo un Mejor Gobierno                                            | ICMA         | Coahuila   | Done      | Civil Society |
| 98  | Mónica Meltis           | Executive Director, Data Cívica                                                              | MEPP         | CDMX       | Done      | Civil Society |
| 99  | Nancy Camacho           | Control and Evaluation Subdirector, MPA                                                      | World Bank   | CDMX       | Done      | IP            |
| 100 | Natalia Jardón          | Former Senior Activities Manager at Mexico, MEPP                                             | MEPP         | CDMX       | Done      | IP            |
| 101 | Nelson Dias             | Participatory Budget Expert, World Bank                                                      | World Bank   | Portugal   | Done      | IP            |
| 102 | Nicole Velandia         | Ethics and Compliance Assistant Director, PEMEX                                              | MEPP         | CDMX       | Done      | GOM           |
| 103 | Norma Robles            | Secretary of Audit, Transparency and Anti-corruption, Escobedo Municipality                  | ICMA         | Nuevo León | Done      | GOM           |
| 104 | Norma Yadira Lozano     | President, CPC Chihuahua                                                                     | Checchi/ICMA | Chihuahua  | Done      | Civil Society |
| 105 | Octavio Chávez          | Director, ICMA                                                                               | ICMA         | Jalisco    | Done      | IP            |
| 106 | Odracir Espinoza        | Anti-Corruption Special Prosecutor, Specialized Anti-Corruption Prosecution Office in Sonora | Checchi      | Sonora     | Done      | GOM           |

|     | Name                      | Job Title                                                                                      | Activity             | State      | Interview | Sector                     |
|-----|---------------------------|------------------------------------------------------------------------------------------------|----------------------|------------|-----------|----------------------------|
| 107 | Pablo Montes              | Anti-Corruption Coordinator, IMCO                                                              | IMCO                 | CDMX       | Done      | IP                         |
| 108 | Pamela Ordaz              | Former Communications Director, Cananea Municipality                                           | World Bank           | Sonora     | Done      | GOM                        |
| 109 | Paolina Gutiérrez         | Human Capital Department as Internal Communications and Events Coordinator                     | CCINL                | Nuevo León | Done      | IP                         |
| 110 | Patricia López            | Director of Professionalization, MPA Chihuahua                                                 | Checchi/ICMA         | Chihuahua  | Done      | GOM                        |
| 111 | Raquel González Rodríguez | Head of the Control and Management Unit, Specialized Anti-Corruption Prosecution Office        | Checchi              | Coahuila   | Done      | GOM                        |
| 112 | Rebeca Paredes            | Corporate Integrity Researcher, IMCO                                                           | IMCO                 | CDMX       | Done      | Civil Society              |
| 113 | Ricardo Corona            | Legal Director, IMCO                                                                           | IMCO                 | CDMX       | Done      | Civil Society              |
| 114 | Roberto Moreno            | Head of Risk and Public Policy Unit, SESNA                                                     | Checchi / World Bank | CDMX       | Done      | GOM                        |
| 115 | Rodrigo Felix Montalvo    | Head of Anti-Corruption, Rule of Law and Competition Policy at Foreign and Commonwealth Office | Prospective Analysis | CDMX       | Done      | International Organization |
| 116 | Rolando Sánchez           | <i>Soy Honesto</i> Project Manager, CCINL                                                      | CCINL                | Nuevo León | Done      | Civil Society              |

|     | Name               | Job Title                                                                         | Activity      | State      | Interview | Sector         |
|-----|--------------------|-----------------------------------------------------------------------------------|---------------|------------|-----------|----------------|
| 117 | Sandrine Molinard  | General Director, Consejo Cívico                                                  | CCINL/Checchi | Nuevo León | Done      | Civil Society  |
| 118 | Silber Alonso Meza | Director, Iniciativa Sinaloa                                                      | UNDP          | Sinaloa    | Done      | Civil Society  |
| 119 | Tim Kessler        | Former COP at Mexico Economic Policy Program                                      | MEPP          | CDMX       | Done      | IP             |
| 120 | Vanessa Reilly     | Former Transparency Advisor, USAID                                                | USAID         | CDMX       | Done      | Funder         |
| 121 | Vania Pérez        | Integrity and Strengthening of Transparency and Anti-Corruption Coordinator, UNDP | UNDP          | CDMX       | Done      | IP             |
| 122 | Víctor Zúniga      | Ph.D. in Sociology, expert on quantitative field analysis                         | CCINL         | Nuevo León | Done      | Sub-contractor |

## WORKSHOPS

|     | Name                        | Job Title                                                        | Activity | State     | Interview | Sector |
|-----|-----------------------------|------------------------------------------------------------------|----------|-----------|-----------|--------|
| 123 | Abigail Villanueva          | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 124 | Alejandro Arellano          | National System for the Integral Development of the Family (DIF) | ICMA     | Chihuahua | Workshop  | GOM    |
| 125 | Alejandro García Izquierdo  | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 126 | Alma Paulina Amador         | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 127 | Andrés Alejandro de la Cruz | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 128 | Beatriz Adriana García      | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 129 | Carmen A. Carreón           | National System for the Integral Development of the Family (DIF) | ICMA     | Chihuahua | Workshop  | GOM    |
| 130 | Daniela Morales Silva       | National System for the Integral Development of the Family (DIF) | ICMA     | Chihuahua | Workshop  | GOM    |
| 131 | Danna Zavala García         | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 132 | Dulce Ramírez               | National System for the Integral Development of the Family (DIF) | ICMA     | Chihuahua | Workshop  | GOM    |

|     | Name                         | Job Title                                                        | Activity | State     | Interview | Sector |
|-----|------------------------------|------------------------------------------------------------------|----------|-----------|-----------|--------|
| 133 | Eleazar Robles García        | National System for the Integral Development of the Family (DIF) | ICMA     | Chihuahua | Workshop  | GOM    |
| 134 | Erick Alcantar Elías         | National System for the Integral Development of the Family (DIF) | ICMA     | Chihuahua | Workshop  | GOM    |
| 135 | Fernando Rios Orozco         | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 136 | Jaime Andrade Madrid         | National System for the Integral Development of the Family (DIF) | ICMA     | Chihuahua | Workshop  | GOM    |
| 137 | Jesús Iván Cerda González    | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 138 | Jorge A. Borja Valenzuela    | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 139 | Jorge A. Garay Quiroz        | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 140 | José Raúl Luna Solis         | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 141 | José René Guerra             | National System for the Integral Development of the Family (DIF) | ICMA     | Chihuahua | Workshop  | GOM    |
| 142 | Juan Ignacio Resendes Alonso | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 143 | Julio César Lerma            | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |

|     | Name                        | Job Title                                                                   | Activity | State     | Interview | Sector |
|-----|-----------------------------|-----------------------------------------------------------------------------|----------|-----------|-----------|--------|
| 144 | Karen Adelina Lara          | National System for the Integral Development of the Family (DIF), Chihuahua | ICMA     | Chihuahua | Workshop  | GOM    |
| 145 | Karina Arias                | National System for the Integral Development of the Family (DIF)            | ICMA     | Chihuahua | Workshop  | GOM    |
| 146 | Karina Piña Figueroa        | National System for the Integral Development of the Family (DIF)            | ICMA     | Chihuahua | Workshop  | GOM    |
| 147 | Liliana Gabriela Briseño    | Superior Audit of the State of Coahuila (ASEC)                              | ICMA     | Coahuila  | Workshop  | GOM    |
| 148 | Loty Johanna Aguirre        | National System for the Integral Development of the Family (DIF)            | ICMA     | Chihuahua | Workshop  | GOM    |
| 149 | Luis Alonso Morales Escobar | Superior Audit of the State of Coahuila (ASEC)                              | ICMA     | Coahuila  | Workshop  | GOM    |
| 150 | Luis Edgar Martinez Cruz    | Superior Audit of the State of Coahuila (ASEC)                              | ICMA     | Coahuila  | Workshop  | GOM    |
| 151 | Magaly Méndez Solís         | Superior Audit of the State of Coahuila (ASEC)                              | ICMA     | Coahuila  | Workshop  | GOM    |
| 152 | Martin Melecio Zapata Ríos  | Superior Audit of the State of Coahuila (ASEC)                              | ICMA     | Coahuila  | Workshop  | GOM    |
| 153 | Michelle Martínez           | National System for the Integral Development of the Family (DIF)            | ICMA     | Chihuahua | Workshop  | GOM    |

|     | Name                     | Job Title                                                        | Activity | State     | Interview | Sector |
|-----|--------------------------|------------------------------------------------------------------|----------|-----------|-----------|--------|
| 154 | Miguel Arispe Núñez      | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 155 | Nallely Montserrat Cantú | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 156 | Olimpia Aguirre Olivas   | National System for the Integral Development of the Family (DIF) | ICMA     | Chihuahua | Workshop  | GOM    |
| 157 | Patricia Gaona           | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 158 | Reyna Nataly Muñiz       | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 159 | Rodrigo Daniel Hernández | Superior Audit of the State of Coahuila (ASEC)                   | ICMA     | Coahuila  | Workshop  | GOM    |
| 160 | Rolando Márquez          | National System for the Integral Development of the Family (DIF) | ICMA     | Chihuahua | Workshop  | GOM    |
| 161 | Sergio Parra             | National System for the Integral Development of the Family (DIF) | ICMA     | Chihuahua | Workshop  | GOM    |

## **ANNEX V: CASE STUDIES**

### ***Transparency Rapid Response Program (TRRP) – Checchi and Company Consulting, Inc.***

#### **Introduction**

Transparency Rapid Response Program (TRRP) was an activity developed and implemented by Checchi and Company Consulting, Inc., at the federal and subnational levels (Chihuahua, Nuevo León, Sonora, Coahuila, and Jalisco). The activity goes from 2016 to 2021. The performance evaluation covers the period from October 2016 to September 2019, which had an estimated cost of 3,753,500 USD. It was designed as a rapid response mechanism to give concrete support to Mexican authorities, members of the newly created National Anti-corruption System, and civil society organizations in their efforts to counter corruption.

#### **Background**

Mexico enacted a series of constitutional reforms and a package of complementing laws to create the National Anti-corruption System (SNA) at the federal and state levels. Implementation of the SNA system requires a massive effort. To contribute to building GOM and civil society capacities, USAID/Mexico designed a rapid response initiative. The purpose was to provide technical assistance to the Mexican government, bring international best practices, and increase civil society accountability and transparency initiatives (Checchi, 2016).

**Table 13. TRRP Stakeholder Mapping**

| Name                                                                                                 | Role                                                                                                                                                                                                                        |
|------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales (INAI) | Major counterpart.                                                                                                                                                                                                          |
| Auditoría Superior de la Federación (ASF)                                                            | Major counterpart.                                                                                                                                                                                                          |
| Ministry of Public Administration (MPA)                                                              | Major counterpart.                                                                                                                                                                                                          |
| Secretaría Ejecutiva del Sistema Nacional Anticorrupción (SESNA)                                     | Major counterpart.                                                                                                                                                                                                          |
| Civil Society Organizations                                                                          | Target group of the activity at both the federal and subnational levels. The activity has also established partnerships with some CSOs to implement interventions (Rapid Results Institute, Ethos, and CIDE, among others). |
| Selected Subnational Entities                                                                        | These are a target group of the activity. Selected states are Chihuahua, Coahuila, Nuevo León, Sonora, and Jalisco.                                                                                                         |
| Citizen Participation Committee (CPC) members                                                        | These are a target group of the activity at the federal and subnational levels.                                                                                                                                             |

### Description of the Activity

This was a three-year activity designed to provide technical assistance to the Mexican government in order to support transparency, accountability, and anti-corruption programs at the federal, state, and local levels; bring international best practices into the reform implementation; and increase civil society accountability and transparency initiatives.

The overall objective was to support the implementation of the National Anti-corruption System (SNA) and to standardize the legal framework that will replicate similar reforms at the state level. The Activity intended to accomplish this by strengthening interinstitutional coordination mechanisms and facilitating CSO engagement to prevent, investigate, and penalize corruption more effectively (Checchi, 2017a).

The Activities' assistance was designed to be demand-driven. The cornerstone of the approach rested on the Activities' Advancing Policy and Institutional Change (APIC) toolkit, promoting and incorporating international best practices in the Activities' work, and creating and fostering sustainable CSO participation in the reforms (Checchi, 2017a).

## Objectives and Components

The main purpose was to assist Government of Mexico (GOM) federal and selected state institutions to develop and implement anti-corruption reforms in conjunction with increased citizen participation. According to TRRP's Work Plans (Checchi, 2017a; Checchi, 2018a) it has four components:

### *Component 1. Collaboration and Coordination of Stakeholders*

This component included a political economy analysis (PEA) to identify stakeholders and using the APIC tool to diagnose institutional and policy strengths, weaknesses, and windows of opportunity. Based on this and working with key partners, the purpose was to mobilize support for transparency reforms, help government and civil society engage in collaboration through the CPC, and support civil society efforts to strengthen anti-corruption networks in states and municipalities. For 2018, this intervention would focus on accompanying CSOs and other stakeholders in monitoring the appointment process of SNA-operating units in target states, specifically those of local CPCs and Executive Secretariats; and working with state CPCs and Executive Secretariats in developing their operational documents.

Sub-Objective 1.1. Assist in setting up and consolidating the operations of SNA units at the national and state levels.

Sub-Objective 1.2 Mobilize broad-based support for SNA implementation.

Sub-Objective 1.3 Assist in issuing systematic policies and directives to curb corruption.

### *Component 2. Access to Information*

This component aimed at supporting the Instituto Nacional de Transparencia and Acceso a la Información y Protección de Datos Personales (INAI) with training materials to increase its capacity to fulfill their responsibilities in the areas of transparency, access to information and personal data protection.

Sub-Objective 2.1 Enhance the capacities of INAI staff and that of State Access to Information Institutes to carry out their mandate under the SNA.

Sub-Objective 2.2 Assist in coordinating the agendas of the National Transparency System and the National Anti-corruption System.

### *Component 3. Formalizing Governance and Legal Framework*

Drawing from lessons learned in the implementation of the criminal justice system, this component aimed at supporting civil society participation to hold the government accountable, and in turn, contribute to formalizing GOM's anti-corruption, transparency, and accountability framework. Mainly, the intervention would work closely with different stakeholders and CPC.

Sub-Objective 3.1 Assist in developing and adopting procedures to facilitate implementation of the SNA at the state level.

### *Component 4. Building GOM and CSO Capacity*

The objective was to build GOM and CSO capacity by supporting training initiatives led by the Ministry of Public Administration (MPA), the National Forum of State Governors (Conferencia Nacional de Gobernadores, CONAGO) and others, and developing internet-based, easily accessible and updatable training materials for GOM and CSO users. For 2018, it would focus on on-site and virtual training initiatives in coordination with academic institutions, CSOs and GOM agencies, such as the MPA.

Sub-Objective 4.1. Foster and enhance the capacities of key GOM institutions to implement the SNA.

Sub-Objective 4.2 Enhance the capacities of CSOs to advocate for SNA-implementation and track its progress.

## Theory of Change Evaluation

The Activity developed the following Theory of Change:

Periodic political economy analyses, followed by strategic and demand-driven technical assistance, training, and other targeted support mechanisms to key government officials and civil society organizations can be a catalyst for sustained improvements in Mexican government transparency and accountability, and will reduce government corruption and conflict of interest (Checchi, 2017a).

Assumptions:

- Continued political will on the part of GOM agencies at the federal and state levels to comply with the deadlines established by law to create and allocate funding for the operations of the SNA's basic institutional infrastructure (e.g., Executive Secretariat, Citizen Participation Committee, etc.)
- Increased role and commitment of CSOs in pushing for implementation of the SNA at the federal level and its peer systems at the local level (Checchi, 2017a)

TRRP was designed as a mechanism to address specific requests from GOM authorities, local SNA actors, CSOs, and USAID. The flexibility of the mechanism, interventions, and targets, makes it difficult to assess the Theory of Change by analyzing potential internal and external risk factors. For this reason, the evaluation team has articulated a set of criteria inspired by the Organization for Economic Cooperation and Development/Development Assistance Committee (OECD/DAC) principles, the Humanitarian Performance Monitoring (HPM) indicators, and other core humanitarian standards.<sup>22</sup> This set of criteria is pertinent because it measures how core elements were addressed (including timeliness of response, quality of the service, financial and human resource mobilization, effective communication and coordination mechanisms, among others), and rather than assessing impact or sustainability, the criteria assess the linkages between response and transition or exit strategies, in this case, strategic planning and contributions to strengthening and building local capacities.

The proposed set of criteria is as follows:

### 1. Appropriateness

- Extent to which the activity is suited to the priorities and policies of the target group, recipient, and donor agency
- Addressed needs identified through initial appeal and needs evaluation

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<sup>22</sup> For more information, refer to the following: (1) Thomaz Chianca, "The OECD/DAC Criteria for International Development Evaluations: An Assessment and Ideas for Improvement," *Journal of MultiDisciplinary Evaluation*, Volume 5, Number 9, March 2008. (2) Australian Development Agency, "Guidance for Activities and Programme Evaluations," July 2009, consulted at <https://www.oecd.org/development/evaluation/dcdndep/47069197.pdf> (3) Guidance Note: Humanitarian Indicator Registry NAFT, Defining and Linking Needs Assessment and Response Monitoring Indicators, note to the Inter-Agency Standing Committee (IASC) Humanitarian Programme Cycle (HPC) Reference module, consulted at <https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/Guidance%20Humanitarian%20Indicator%20Registry%2008.13.pdf>

- Addressed key concerns related to technical capacity, human and financial resources

## 2. Effectiveness

- Extent to which the activity attained its objectives (meeting of targets set under M&E)
- Timeliness of response, including financial and human resources, and technical expertise

## 3. Communication

- Effective communication mechanisms
- Trust building (confidence and working relations established)

## 4. Coordination

- Internal management: strengths and weaknesses in logistic and operational support
- External coordination: mobilization of partners and/or recruitment of subcontractors (for example, technical expertise needed)
- Joint decision-making

## 5. Coverage

- Initial target groups and geographical areas selected under a sound set of criteria
- Integration of different stakeholders into joint programs

## 6. Good practice and innovation

- Quality of the services provided: provision of alleged services, following acceptable standards of practice in the field, adoption of the most current scientific knowledge or methodologies, ethicality
- Clear guidelines to recipients on aspects to be covered by the services
- Flexibility to improving effectiveness

## 7. Connectedness and transition

- Setting up a strategic framework after first appraisal and needs evaluation: Integrated intervention approach vs. single, isolated approach
- Adequately addressed needs aimed at strengthening and building local capacities (measured in terms of key informants' perception of its utility)

## Design Analysis

### *Anti-Corruption Approach*

The Activity's design was aligned to USAID's approach. It focused explicitly on assisting key GOM agencies at the federal and state levels to develop and implement anti-corruption policies, while also supporting CSOs engagement with each other and with GOM to strengthen the development and implementation of these policies.

### *Alignment to USAID's Development Objective (DO) and Intermediate Results (IRs)*

The Activity's design was aligned to USAID's DO and IRs. It is intended to address both GOM's capacity to develop and implement anti-corruption legal and policy frameworks and CSOs participation and engagement with GOM to increase transparency and accountability. Thus, the Activity's design explicitly aimed at contributing to (Sub) IR 3.3.1 *Non-governmental actors' capacity to advocate and*

*demand implementation of anti-corruption reforms enhanced; and to (Sub) IR 3.3.2 GOM technical capacity to implement legal and policy frameworks for accountability and transparency improved.*

Overall objective: Facilitate implementation of the SNA and standardize the corresponding legal framework at the state level by means of strengthening inter-institutional coordination mechanisms and enhancing GOM capacities and CSO engagement to prevent, investigate, and penalize corruption more effectively (Checchi, 2018a).

#### *Alignment to USAID's Local Systems Framework*

The Activity's design was adequately aligned to USAID's Local Systems Framework (LSF). Not only was its very nature demand-driven, but also the activities were based on tools to map stakeholders; identify relations, interests, and opportunities to collaborate; and put forward mechanisms to engage with actors committed to reform. Planning, design, and implementation of activities were conducted in collaboration with stakeholders, and its embedded flexibility allowed the activity to adjust according to the needs and opportunities on the ground. In addition, most of the activities were designed to provide concrete technical assistance, hence minimizing direct provision of services and enhancing local actors' capacities.

Regarding the 5 Rs, Checchi developed an activity that tried to address the rules governing the system: those defining and assigning roles (i.e., providing assistance to the government to better develop its capacity as well as strengthening those of the civil society) and relationships (facilitating connections and interactions between actors—the 100-Day Challenge is an example of this). Resources (transformation of resources, e.g., budgetary allocations into outputs) were not directly addressed. Although the activities of the activity were not part of an integrated strategy, according to most key informants the result was strengthening the National Anti-corruption System.

### **Implementation Review**

#### *Planned Activities vs. Implemented Activities*

This is a rapid response mechanism with the flexibility to address a range of requests from GOM, civil society, and USAID's interests. Thus, while the objectives and components were not expected to have changes, the proposed interventions in the Scope of Work were illustrative and meant to change based on Mexican demand, changing contexts, constraints, and opportunities.

During the first year, the Activity tried to assist in aligning the legal framework at the state level and in setting up and launching the operations of key governance and operational bodies of the SNA, mainly the CPC and the Executive Secretariat. According to the documentation (Checchi, 2017; Checchi, 2018), challenges were encountered during the implementation, as the CPC did not show willingness to work with the Activity in the first year (2017), and some CSOs in Mexico City did not trust the Activities' involvement (C80; Checchi, 2017; Checchi, 2018). There were also concerns at the CPC because its members felt that the legal framework did not allow direct funding from foreign sources. Other actors such as CONAGO, identified at first as a potential ally, particularly through its Transparency Commission, also failed to be engaged in the activity. This was likely due to the sensitivity of the topic and because Checchi was perceived more like a USAID representative than a subcontractor.

In response, USAID retargeted efforts to the states, where TRRP managed to support the launch of a network involving state and national CPC members (Checchi, 2017a). The Activity assisted them with communications and planning events to bring them together as part of a formalized network. According to key informants, Checchi's support was critical to integrate the CPC network and its working commissions, which will likely have an impact in terms of consolidating the system, formulating strategic plans, and linking CPC's objectives with citizens' demands (C14, C56, C118). Likewise, the Activity

supported the development of a network of state anti-corruption prosecutors. TRRP supported in logistics and the methodology for the sessions, which was crucial to establish clear objectives and commitments (C97). These two networks have been assessed by informants as some of the most significant changes resulting from the activity (C14, C56, C97) and they will probably become an important force in the consolidation of the SNA.

Changes in government officials worked in favor and against the activity: in the case of the CPC, TRRP's work at the subnational level and changes at the national CPC, allowed Checchi to build collaborative relations in 2018 (C80, C115). They also managed to collaborate with the Executive Secretariat of the National Anti-Corruption System (SESNA), giving support in the online survey and state forums in order to conduct the nationwide consultation process to draw the national anti-corruption law (C14, C18). Conversely, allies like the Ministry of Public Administration (MPA), who received support at first on a review and recommendations for the Testigos Sociales (Social Witnesses) program (Checchi, 2018a), stopped the collaboration, expressed reluctance to work with USAID, and discounted some activities done, like the Social Witness program (USAID, 2019).

In terms of aligning the legal framework in the states, most were reluctant to have USG assistance on constitutional reforms. As explained by informants, legal harmonization is a sensitive matter, actors may not be familiar with USAID's programs, and some CSOs and CPCs members (mainly in Mexico City, but also in the states) showed reluctance to work with USG (C29, C46, C80, C115). The only state that accepted the collaboration was Chihuahua, where the Activity assisted in drafting state anti-corruption laws to help civil society develop strategies for engaging with state lawmakers. Particularly, the Activity supported by drafting a technical opinion, assessing two different constitutional amendment bills drafted by Chihuahua's Congress and by the Executive branch, to create the State Anti-corruption System (SEA). Also, at the request of local legislators and the local private sector organization Fideicomiso para la Competitividad y Seguridad Ciudadana (FICOSEC), the Activity revised and submitted proposed changes to Chihuahua's draft SEA Law; some suggestions were incorporated in the final draft (Checchi, 2017).

Other states received help on drafting initiatives or providing inputs for reform. In Nuevo León, the TRRP conducted a study to align the legal framework in the municipalities, including a diagnosis and recommendations for it (C108, C126, C127). This has not only been useful in Nuevo León, but informants in other states, like Sonora, stated its practicality and importance (C82). They also helped Nuevo Leon Civil Council in drafting an amendment proposal for the procurements law. Although the Council is still lobbying with the legislature, the assistance provided responded to an identified need and key informants have stated that it strengthened their capabilities as well as built up their relations with the legislative body (C29, C46).

In terms of enhancing coordination mechanisms, in 2018, TRRP launched its first 100-Day Anti-Corruption Challenge in Coahuila, where two teams focused on improving the number of criminal cases and administrative sanctions for corruption. During 2019, TRRP replicated the exercise, launching its second 100-Day Challenge in Jalisco. The Challenge included the participation of both government agencies and CSOs. According to key informants, the 100-Day Anti-Corruption Challenge improved greatly the coordination and communication among institutions, motivated public employees participating in the exercise (evidence was provided particularly from operative staff at the Specialized Anti-corruption Prosecution Office), and helped civil society to understand what the roles of the institutions are, their processes and challenges (C55, C62, C63, C94, C95, C115, C127).

Finally, the Activity supported capacity development interventions directed at public officials on their new responsibilities under the law. In 2017, 655 government officials and 273 individuals affiliated with CSOs benefited from Activity workshops. Fourteen CSOs engaged in advocacy activities with their governments following Activity support (Checchi, 2017a). In 2018, the Activity assisted in launching a new Massive Open Online Course (MOOC) platform on the SNA with the university Centro de

Investigación y Docencia Económicas (CIDE) and the CSO Red por la Rendición de Cuentas (RRC) (Checchi, 2018a). It also developed a manual on the linkages between the SNA and the National Transparency System for the INAI. While most capacity development activities and manuals were designed with their beneficiaries, evaluations by key informants on their practicality differ: on the one hand, some voices have pointed out that these were not always tailored to the work of decision-makers (C56) or to the thematic priorities of the institutions at the local level (C97), and that trainings would have needed follow-up sessions and counseling to foster its practical use (C165). On the other hand, some stated that trainings were crucial, not only for strengthening human capacities but also because they have improved overall performance (C4, C59, C82, C134). It is also early to conclude what behavioral or institutional changes will result from the training provided.

To sum up, the main challenges faced during the implementation that required adjustments of focus or scope, include the following:

- In 2017, the CPC was reluctant to work with the Activity. According to the documentation provided, its members felt that the CPC's legal framework did not allow direct funding from foreign sources.
- The first use of the APIC framework to develop, implement, and monitor anti-corruption policies was not accomplished due to the unwillingness of CPC to work with the activity. TRRP made the APIC framework available to target states' local CPCs as an alternative. No evidence found on its practicality.
- State congresses, local governments, and few civil society organizations were resistant to USG technical assistance in the drafting of constitutional reforms and the law needed to create each State's Anti-corruption System. Chihuahua was the only target state that opened up its doors for collaboration in 2017.
- CONAGO was initially conceived as a potential ally. However, it did not answer the request for collaboration.
- Counterparts in MPA have expressed reluctance to work with USAID and have discounted some activities done during the previous administration, such as the evaluation on the Testigos Sociales program.
- The Activity focused less on Access to Information than what was originally planned.

## Benchmarks

### *Main Outputs and Outcomes Achievement*

**Table 14. TRRP Indicators**

| Indicator                                                                                                                                                         | Target | Actual | Percent |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|---------|
| <b>Foreign Assistance</b>                                                                                                                                         |        |        |         |
| Number of legislative and/or procedural reforms to bring Federal and/or State legal framework into compliance with the SNA                                        | 5      | 5      | 100%    |
| Number of USG-assisted CSOs that participate in legislative proceedings and/or engage in advocacy with national or state legislature and its committees (2.2.1-7) | 6      | 16     | 266%    |
| Number of USG-supported anti-corruption measures implemented (2.2.4-7)                                                                                            | 13     | 10     | 77%     |
| Number of CSOs assisted                                                                                                                                           | 15     | 62     | 413%    |
| Number of CSOs receiving USG assistance engaged in advocacy interventions (2.4.1-9)                                                                               | 9      | 20     | 222%    |
| Number of government officials receiving USG-supported anti-corruption training (2.2.4-2)                                                                         | 976    | 1,383  | 142%    |
| Number of people affiliated with NGOs receiving USG-supported anti-corruption training (2.2.4-5)                                                                  | 505    | 645    | 128%    |
| Number of mechanisms for external oversight of public resource use supported by USG assistance (2.4)                                                              | 3      | 0      | 0%      |
| Number of USG-supported anti-corruption measures implemented at the subnational level (2.2.4-7)                                                                   | 14     | 25     | 178%    |
| Number of governing and executive units of the SNA and State Anti-Corruption Systems established and operating with USAID support                                 | 14     | 29     | 207%    |
| Number of mechanisms in place to engage freedom of information institutes at the national and state levels in facilitating the implementation of the SNA          | 3      | 2      | 76%     |

## Main Findings

### *Results*

TRRP has been effective at providing prompt assistance to key counterparts that, in turn, have been able to catalyze processes toward the consolidation of anti-corruption reforms, particularly at the state level.

Informants agreed that the 100-Day Anti-Corruption Challenge was one of the most significant changes resulting from the Activity. According to the interviewees, the Challenge gave place to diverse improvements—innovation, efficiency of processes, teamwork, and positive competitiveness among institutions—but the most relevant from their view was the coordination and communication mechanisms generated among state anti-corruption institutions, as well as the motivation and empowerment of the

personnel working in these institutions (C55, C62, C63, C94, C95, C115, C127). Evidence of institutional changes was provided particularly from operative staff at the Specialized Anti-corruption Prosecution Office, and both public officials (authorities and operating staff) and CSO members agreed on these effects. The methodology also had positive effects regarding the interactions between CSOs and local institutions by opening up dialogue and collaboration, and by understanding of each other's capacities, roles, and priorities, which is considered a significant change attributable to the interventions (C55, C62, C63, C94, C95).

Another significant change concerns the CPC network and the anti-corruption prosecutors' network. In both, TRRP supported with logistics, communications, and methodology for the sessions. Both networks have already agreed on actions to continue working: in the case of the CPCs, the support resulted in establishing working commissions, and in the case of the anti-corruption prosecutors, it resulted in a manifest with 10 commitments, which will be the base for their work. It is worth mentioning that different interviewees stated that both developing the 100-Day Challenge and establishing these networks would not have been possible without Checchi's support (C62, C94, C97).

In terms of the service and the criteria proposed for its evaluation (Theory of Change Evaluation section), it stands out that most interviewees agreed on its appropriateness—tailored to local needs—and timeliness of the response. According to interviewees, TRRP supported concrete but key and time-sensitive interventions at the national and subnational level (C14, C29, C46, C56, C80, C86, C118, C137, C139, C165). In this sense, although not all of them were strategic, the support provided was decisive to move forward from one stage to the other (C139). Informants' valued actions include both methodologies and studies, as well as events, logistics, and transportation support. In one interviewee's words, support in logistics and events might sometimes be difficult to measure in terms of impact, but at critical times, it can help to keep attention and relevance of the agenda (C137). Additional characteristics valued by informants were the technical expertise of the team and the capacity to mobilize support needed (both from experts and from fostering connections with other actors) without arduous administrative processes (C29, C46, C82, C108, C126, C139). In this sense, informants stated that the Activity provided permanent counseling from the team, which might be intangible, but added great value (C137); and, particularly at the subnational level, informants emphasized the technical expertise of the consultants hired (C46, C82, C108).

### *Factors Affecting the Activity*

Regarding internal factors, most interviewees agreed on the appropriateness of TRRP's interventions (tailored to local needs), the flexibility, and timeliness of the response. According to key informants, TRRP supported concrete and time-sensitive interventions with members of the State Anti-Corruption System at the national and subnational level (C14, C29, C46, C56, C80, C86, C118, C137, C139, C165). Similarly, informants valued the technical expertise of Checchi's team and the capacity to mobilize support needed (from both experts and fostering connections with other actors) without arduous administrative processes (C29, C46, C82, C108, C126, C139).

**Table 15. TRRP Factors Affecting the Activity**

| Internal                                                                                   | External                                         |
|--------------------------------------------------------------------------------------------|--------------------------------------------------|
| ✓ Demand-driven: concrete assistance, tailored to needs and priorities of the target group | ✓ Sense of urgency in the states to give results |

| Internal                                                                                                  | External                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| ✓ Flexibility, pertinence, and timeliness of response                                                     | ✗ Openness, high need for assistance, and weak institutional infrastructure at the local level                                                   |
| ✓ Continuous advice and technical expertise                                                               | ✗ Lack of trust: reluctance from some actors to work with the activity (CPC at first, CSOs Mexico City and Nuevo León, some sectors in Coahuila) |
| ✗ In some cases, a lack of clarity on what the activity offered                                           |                                                                                                                                                  |
| ✗ No strategic actions, but isolated                                                                      |                                                                                                                                                  |
| ✗ In some cases, the practicality of capacity development interventions and manuals developed is in doubt |                                                                                                                                                  |

On the other hand, some interviewees noted that, at first, the sort of assistance that Checchi was ready to provide was not clear (C14, C56, C118). Similarly, as a consequence of working within a newly created system, informants pointed out that TRRP's actions were not strategic, but isolated—opportunities appeared and they took them (C56, C137, C165). In addition, although targets were met in terms of capacity development and manuals developed, interviewees differ on their practicality. In essence, some interviewees (C4, C59, C82, C134) pointed out that workshops and manuals were crucial for strengthening human capacities and institutional performance. In contrast, others (C56, C97, C165) think they lack enough consideration of decision-makers or institutional priorities, or that follow-up is needed. It is also early to conclude what behavioral or institutional changes will result from the training provided.

In the case of the 100-Day Challenge, TRRP's technical guidance and the existence of a champion to bring state anti-corruption institutions on board—particularly the head of the judicial power—were relevant for effectively implementing the challenge (C80, C94, C115).

Regarding external factors, informants agreed that TRRP faced challenges, particularly during the first year (2017), related to lack of trust and reluctance from some actors to collaborate with the Activity, and, conversely, that TRRP's work at the subnational level was facilitated by a sense of urgency to give results, the need for assistance, and a weak institutional infrastructure (C80, C115, C127).

### *Lessons Learned*

The Activity encountered external constraints related to lack of trust and reluctance to collaborate from some CSOs in Mexico City and, during the first year, from the CPC members and some CSOs members in Nuevo León. Other key counterparts in MPA were also unwilling to collaborate with the Activity.

USG/GOM bilateral relations, lack of information on the activities of USAID, and reluctance to work with USG are external constraints that might continue to have an impact on USAID's portfolio. Nonetheless, as the TRRP shows, trust-building interventions plus adequately identifying actors

committed to reform and implementing engagement mechanisms based on their needs and priorities, can help overcome these barriers.

Finally, according to key informants, the most relevant enabling factors to work at the state level were a sense of urgency to give results, their openness, great need for assistance, and weak institutional infrastructure; and having leadership (local champions) to advance the Activity (C80, C115, C127, C166).

### *Sustainability*

In terms of connectedness and transition (refer to Theory of Change Evaluation section), as has been argued, the Activity failed to set up a strategic framework, that is, an integrated approach. Nonetheless, most informants stated that actions helped in critical times and areas, and thus contributed to strengthen the system and to build on local capacities (C14, C56, C80, C82, C86, C97, C137, C139).

Due to the diverse nature of each service provided, it would be inappropriate to assess them as a whole and it is early to make a judgment. However, with the information collected so far, the CPC network and the anti-corruption prosecutors' network seem to have established solid bases of collaboration and a road map (working commissions in the case of the CPC and commitments in the case of prosecutors) that could assist them in the short and medium-term.

Other actions will depend on the state-level institutions to continue implementing processes or formalizing knowledge. The 100-Day Anti-Corruption Challenge is a case in point. As of August 2019, CSOs and state anti-corruption institutions continued working together in establishing the next steps to formalize institutional changes, intending to improve oversight by non-governmental actors. Informants stated that it is now the CPC's responsibility to lead the efforts, but some are skeptical about its capacity, while others stated that although they continue with the monthly and quarterly follow-up meetings, participants do not know what the next steps could entail (C63, C94). Hence, it is early to conclude on the formalization of internal processes within each institution.

TRRP's demand-driven design, technical guidance, and the existence of a champion to bring state anti-corruption institutions on board—particularly the head of the judicial power—were relevant for effectively implementing the Challenge (C80, C94, C115).

Finally, there is not enough evidence on the actual applicability of manuals and training. Therefore, no conclusions can be made on sustaining the results.

### **Conclusions**

TRRP has been effective in giving responses to concrete requests. In general, TRRP developed adequate actions, considering the conditions of the SNA system: from the government side, most agencies did not have clear guidelines on their new responsibilities, they lacked technical knowledge and human and financial resources, and in the case of the states, there were conflicting interpretations on how to adapt national legal frameworks. With local authorities, TRRP provided punctual assistance tailored to the needs, at a specific time. As for the non-government side, TRRP took advantage of the context to support CSO's engagement with government actors and building their capacities. The next phase of the activity will be critical to sustain the results.

## ***Increased Transparency through Informed Civic Participation in Local Government – UNDP***

### **Introduction**

Supporting Mexico's Achievement of United Nations Sustainable Development Goals through Open Government and Citizen Participation was an activity developed and implemented by the United Nations Development Program (UNDP) at the federal and subnational levels. It was a three-year Activity, starting in October 2016 and finishing in October 2019, with a total cost of 2,800,000 USD. The purpose was to promote open government mechanisms through dialogue and policy co-creation and to strengthen transparency and integrity through institutional capacity development and citizen participation. The geographic coverage was Nuevo León, Sonora, Chihuahua, Morelos, Oaxaca, Campeche, Durango, Guanajuato, Estado de México, Quintana Roo, San Luis Potosí, Sinaloa, Tabasco, Tlaxcala, and Veracruz (Component 1); and Baja California, Sinaloa, Colima, Tabasco, Durango, Querétaro, Distrito Federal, Estado de México, and Quintana Roo (Component 2)

### **Background**

In 2011, Mexico became one of the eight founding members of the global Open Government Partnership, a collaborative initiative to foster transparency and accountability. At the national level, in 2015 the Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales (INAI) launched the Open Government: Local Co-Creation initiative, which supports open government exercises at the subnational level to establish Local Transparency Secretariats (LTS) and the implementation of transparency Local Action Plans (LAPs).

UNDP identified that most Local Technical Secretariat (LTS) members lacked the needed capabilities to advance effective solutions from a development perspective. The Activity intended to contribute to solve this capacity problem and improve the responsiveness of public institutions and citizen participation (UNDP, 2016). It is worth mentioning that at the outset of the Activity, only Component 1 was agreed and it resulted from a co-creation session led by USAID; while Component 2, which is focused on integrity and transparency, resulted from a specific USAID request to work on anti-corruption (C106).

**Table 16. UNDP Stakeholder Mapping**

| Name                                                                                                 | Role                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>COMPONENT 1</b>                                                                                   |                                                                                                                                                                                                                                                                                                                     |
| Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales (INAI) | Major counterpart. Building ties and consensus with local governments, especially with Local Transparency Secretariats. Providing inputs on open government policies.                                                                                                                                               |
| ProSociedad                                                                                          | Sub-grantee. Generating the contents and syllabus for the capacity development program.                                                                                                                                                                                                                             |
| Gobierno Fácil                                                                                       | Sub-grantee. Designing, programming, and managing the online platform of the activity.                                                                                                                                                                                                                              |
| GESOC                                                                                                | Sub-grantee. Technical advice and follow-up on M&E Plan indicators.                                                                                                                                                                                                                                                 |
| Local Technical Secretariats (LTS)                                                                   | Target group. LTS are integrated by local authorities, members of civil society organizations, and members of the local transparency institutes. Most of the activity efforts are directed to influencing LTS through the advancement of open government commitments focused on sustainable development challenges. |
| Open Government Transformative Agents                                                                | Target group. Received the capacity development program on Open Government practices and Sustainable Development.                                                                                                                                                                                                   |
| <b>COMPONENT 2</b>                                                                                   |                                                                                                                                                                                                                                                                                                                     |
| Ministry of Public Affairs (MPA)                                                                     | Major counterpart. Responsible for federal government integrity and anti-corruption strategies.                                                                                                                                                                                                                     |
| United Nations Office on Drugs and Crime (UNODC)                                                     | Partnership. Supported the design and approval of all the documents for the joint efforts of the MPA and its counterparts in the states to promote integrity programs in companies and private sector organizations.                                                                                                |
| UNDP Regional Center for Latin America and the Caribbean (RBLAC)                                     | Partnership. Provided technical support for developing the platform for public officials' capacity-building.                                                                                                                                                                                                        |
| Public officials                                                                                     | These are a target group of the activity to promote integrity and anti-corruption practices.                                                                                                                                                                                                                        |
| Business chambers, companies, private sector organizations                                           | These are a strategic target group of the activity to promote integrity programs.                                                                                                                                                                                                                                   |
| Civil society organizations (CSOs)                                                                   | Target group to implement the UNDP-MPA fund to support activities that strengthen the SNA.                                                                                                                                                                                                                          |

## **Description of the Activity**

The purpose of the Activity was to establish sustainable government–civil society dialogue and co-creation spaces to counter corruption at the subnational level, and to strengthen transparency at the federal and local level.

It comprised two components aimed at institutional strengthening, capacity development, and construction of tools and methodologies to strengthen citizen participation and accountability in the country at the Federal and state levels. Particularly, it was expected that dialogue and policy co-creation interventions would help increase transparency and counter corruption, and facilitate the development of innovative solutions to help Mexico meet UN Sustainable Development Goal 16; while institutional capacity development and citizen participation for accountability would strengthen the ethical infrastructure of the country and complement current corruption prevention mechanisms (UNDP, 2017). For its implementation, UNDP worked with a wide array of allies, subcontractors, and grantees, including government, private sector, business chambers, CSOs, and other UN agencies.

## **Objectives and Components**

The overall objective was to generate relevant open government commitments with a sustainable development approach and mitigate the risk-factors associated with corruption practices at the local level. It had two components:

### *Component 1. Supporting Mexico’s Achievement of UNDP Sustainable Development Goals through Open Government and Citizen Participation*

This Component involved the implementation of innovative social and digital technologies at the subnational level guided by training and empowering open government transformative agents, and consolidating sustainable spaces for civic–government dialogue and policy co-creation (UNDP, 2016).

The main interventions included a capacity development program for transformative agents (fellowships), which would be implemented in two phases: first, a pilot for 20 fellows from 5 states (Chihuahua, Morelos, Nuevo León, Oaxaca and Sonora), and a second phase for 40 fellows from 10 additional states (Campeche, Durango, Estado de México, Guanajuato, Quintana Roo, San Luis Potosí, Sinaloa, Tabasco, Tlaxcala, and Veracruz). This program would involve an online course and two in-person seminars for each class.

Hand in hand with the INAI and its Open Government: Local Co-Creation Initiative, this Component would support the integration and consolidation of Local Transparency Secretariats (LTS), and the participation of fellows in the LTS to co-create activities and to develop Open Government Local Action Plans (LAPs).

Interventions in this component were implemented by a Working Group, comprising INAI as a partner and the CSOs ProSociedad, GESOC, and Gobierno Fácil as sub-grantees.

### *Component 2. Strengthening Transparency at the Federal and Subnational Level in Mexico*

The purpose of this Component was to strengthen the ethical infrastructure of the country and complement the corruption prevention mechanisms in the framework of the National Anti-corruption System (SNA) through institutional capacity development and citizen participation and accountability interventions (UNDP, 2017).

The main interventions included (1) capacity development program in ethics, public integrity, and prevention of conflicts of interest, directed at public officials; (2) integrity programs for companies, mainly small and medium businesses; (3) small grants and assistance to local organizations working to strengthen transparency and citizen participation with subnational governments; and (4) relaunching a nationwide database of publicly-funded social programs to improve transparency (IPRO).

This Component would be implemented at the Federal level and in 11 states: Baja California, Ciudad de México, Colima, Durango, Estado de México, Hidalgo, Puebla, Querétaro, Quintana Roo, Sinaloa, and Tabasco. The main allies were United Nations Office on Drugs and Crime (UNODC), UNDP Regional Center for Latin America and the Caribbean (RBLAC), and Ministry of Public Administration (MPA) (partners); 10 CSOs (grantees); and public officials, chambers, and companies (strategic target groups).

### **Theory of Change Evaluation**

The evaluation team has articulated a Theory of Change based on the documents, reports of the Activity, and from interviews. The main identifiable components are I: Intervention, M: Mechanism, and O: Outcome, which were taken from the activity's documentation (UNDP, 2016a), and the translation was made by the evaluation team. Context factors, which represent internal and external risks and appear on the sides, were developed by the evaluation team to analyze potential factors that could affect the Theory of Change.

**Figure 4. Theory of Change – UNDP, Component 1**

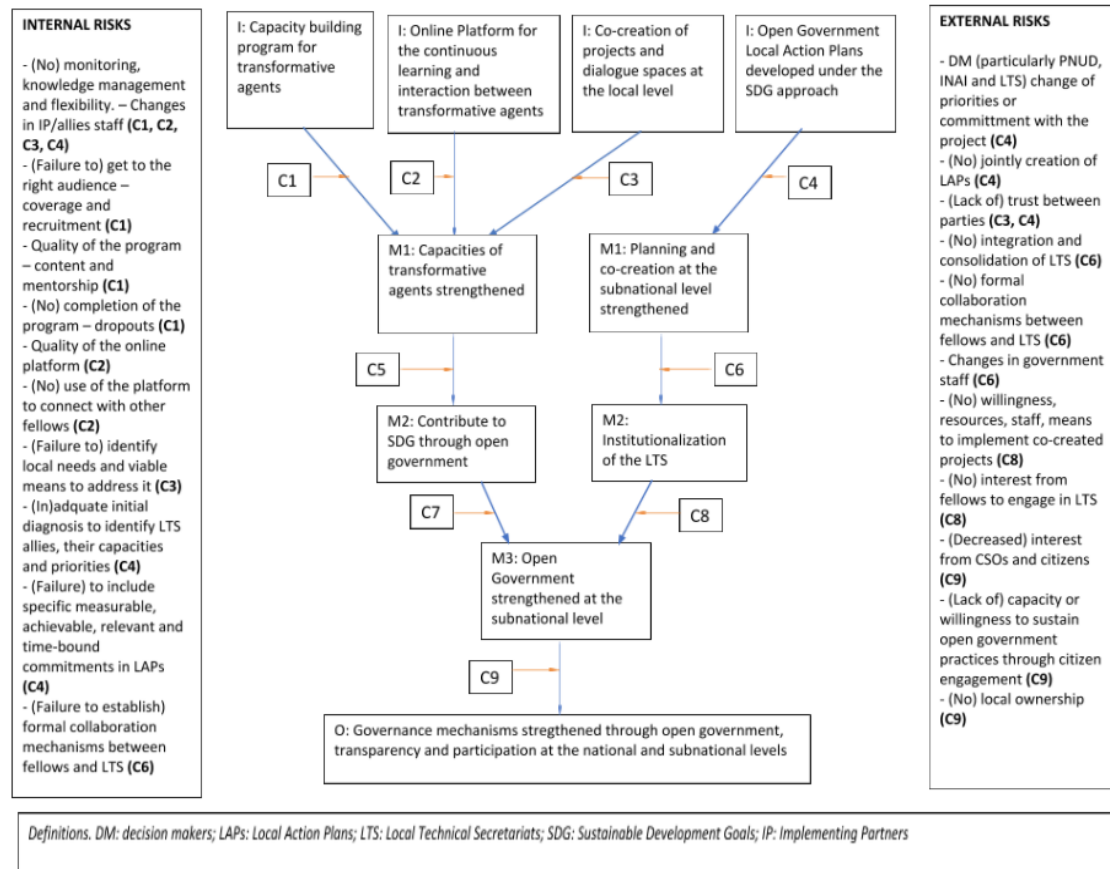
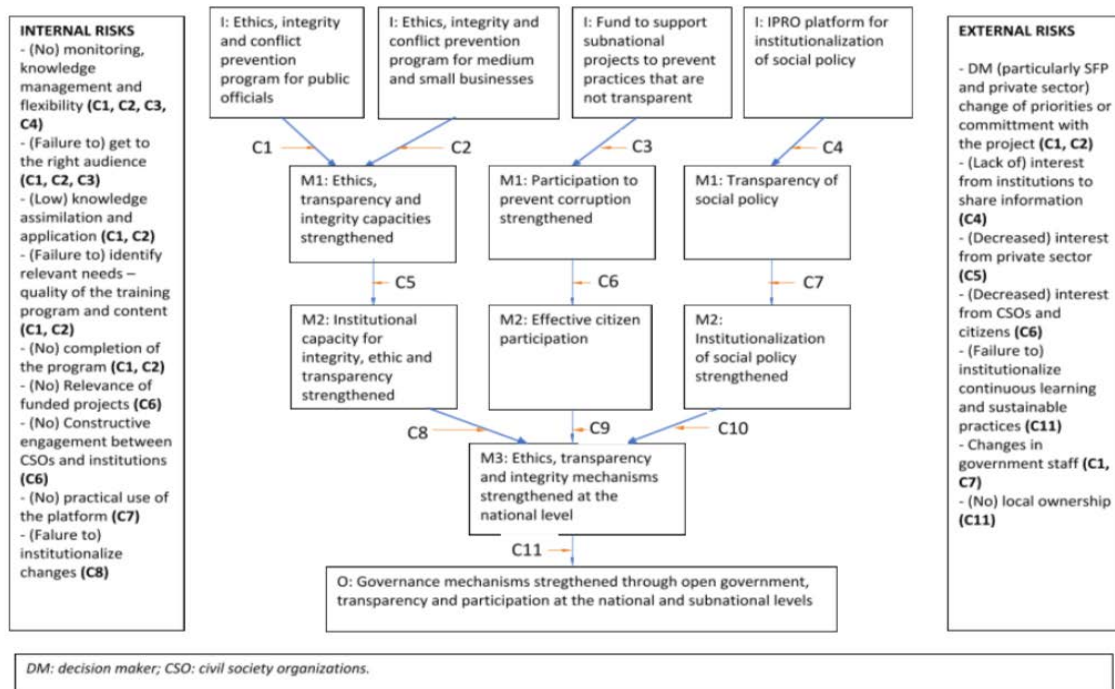


**Figure 5. Theory of Change – UNDP, Component 2**



## Design Analysis

### *Anti-Corruption Approach*

UNDP's approach focuses on prevention and is consistent with the human rights approach to corruption. It aims to contribute to the full exercise of rights and to address the risks factors that promote corruption at the local level. Both components were aligned to supporting the goal to achieve a Mexico in Peace, established in the National Development Plan 2013–2018, as well as the effects of the UNDP Mexico Country Strategy related to the strengthening of transparency, access to information and accountability, and the construction of participatory citizenship (UNDP, 2017).

The dialogue and policy co-creation forums of Component 1 would help increase transparency, counter corruption, and facilitate the development of innovative solutions to help Mexico meet UN Sustainable Development Goal 16, while Component 2 would contribute to improve the levels of confidence, transparency, and integrity in the institutions, as well as stimulate the formation of associations and collective action for citizen control of what is public (UNDP, 2017).

### *Alignment to USAID's Development Objective and Intermediate Results*

This evaluation examines the alignment with reference to the framework results of the Transparency and Integrity Portfolio (USAID Country Development Cooperation Strategy FY2014 –FY2018, Approved April 2014 with addendum as of November 2015), the team did not consider other components of USAID's strategy. Component 1 was poorly aligned with USAID's Development Objective (DO) and Intermediate Results (IRs). Impact Indicators were (1) Number of open government actions with a sustainable development perspective with verifiable positive impacts on local conditions in the targeted states; and (2) level of institutionalization of the LTS (stability over the implementation period, rotation of participants, etc.) (UNDP, 2017; UNDP, 2018).

In design, Component 1 aimed at contributing to USAID's framework by increasing citizens and civil society collaboration through multi-actor coalitions, and could have possibly influenced non-governmental actors' capacity to advocate and demand implementation of transparency, integrity, and accountability reforms. However, activities were not explicitly directed to anti-corruption, but rather to open government and to support the achievement of the sustainable development goals. The monitoring and evaluation matrix included some indicators related to USAID's framework—such as the number of subnational entities receiving USG assistance that improve their performance in national transparency indicators—but these were either under review or not measured specifically in terms of transparency, accountability, or corruption (UNDP, 2017; UNDP, 2018).

Component 2 was adequately aligned to USAID's DOs and IRs, directly aiming at strengthening transparency and integrity. Specifically, the public officials' capacity development program aimed at improving GOM technical capacity to implement policy frameworks for accountability and transparency and to operate with fewer conflicts of interest. It also aimed at contributing to decrease conflicts of interest in the private sector. Similarly, through the grants disbursed to local CSOs, it aimed at contributing to increase collaboration between civil society, citizens, and government through multi-actor coalitions, and enhance their capacity to advocate and demand implementation of anti-corruption reforms. Finally, with the relaunching of the IPRO platform, it intended to improve citizen oversight of procurements and to generate evidence-based analyses and reporting which expose systemic vulnerabilities.

#### *Alignment to USAID's Local Systems Framework*

There is neither acknowledgment of Local Systems Framework (LSF) in the activities' documentation, nor stated knowledge of it by the implementing partners. Nonetheless, some characteristics move toward this approach. In broad terms, the activity focuses on building capacities and catalyzing behaviors, relationships, and performance, which is in line with LSF. Activities like the capacity development program to public officials and private sector, and particularly the small grants to CSOs (co-responsibility fund), intended to contribute to strengthening local systems. Evidence from interviews points out that places where there was almost no organized civil society (like Baja California) have started to build up capacities as a result from the co-responsibility fund. In this case, Iniciativa Sinaloa and Tierra Colectiva started to build a network of CSOs working on anti-corruption issues—first at the state level and after at the national level—and, as a result from the support received by UNDP, they were able to open new spaces of dialogue and to collaborate positively with the government, particularly with SEA institutions (C7, C129, C148).

Regarding Component 1, the open government and co-creation spaces, although designed appropriately in terms of strengthening the system and in conjunction with key actors at the federal level (mainly INAI), interests and relationships at the local level were not adequately addressed, actors were not adequately engaged, and lack of flexibility or adjustments in response to learning put serious challenges to the implementation, particularly to the formalization of collaborative spaces between fellows and LTS, hindering the possibilities of influencing in local systems (C93, C106).

### **Implementation Review**

#### *Component 1. Supporting Mexico's Achievement of UNDP Sustainable Development Goals through Open Government and Citizen Participation*

As planned, the eight-month capacity development program was developed by incorporating online and in-person sessions. For the 2018 edition, some contents, topics, and teaching activities were redesigned to provide transformative agents with more tools to develop advocacy activities using open government tools and a sustainable development approach. According to the documentation and interviews (C25,

C120), migration of the Apertus online platform to either INAI's server or to a university, is, as of October 2019, at a planning stage. The network of fellows might take the lead for this to replicate the intervention (C25).

Fellows were recruited through an open and competitive process. Although the basic requirements of participation did not change from one class to the other, selection criteria in the first year gave more emphasis to young people, most of them from civil society backgrounds; while for the second year, the selection gave priority to people demonstrating previous experience, and thus the profile was higher and some were public officials working directly on transparency and access to information (C93). According to key informants, this change might have had both positive and negative consequences. On the one hand, according to a key informant (C120), the Working Group (WG) decided to accept fellows from government to achieve the intervention's targets, but there was little for the program to offer and in some cases, the selection process was dubious. On the other hand, another key informant (C93) stated that the inclusion of government officials was positive because these fellows showed commitment, supported the fellows' initiatives, and gave formality to the intervention. This might also be relevant in terms of sustaining the results attained so far (C93).

According to the Activity's reports (UNDP, 2017; UNDP, 2018), in 2017, 20 fellows were recruited from the five targeted states; 18 of them (90 percent) successfully completed the capacity-building program and 80 percent of the fellows had a positive evaluation of the platform and its content. As planned, all fellows held an in-person presentation of the activities developed during the training program to the LTS of their states. For the 2018 session, 40 fellows were selected from the 10 targeted states. Of those, 11 were from the government sector, 18 from civil society, 7 from academia, and 4 from the private sector; 37 fellows (92.5 percent) completed the capacity-building program and 10 teams submitted their Open Government Activities.

Despite developing the Open Government Activities, fellows struggled with finding allies and resources for their implementation. Also, not all states had established their LTS; not all of them were designing Local Action Plans, and not all were interested in incorporating the fellows' activities. As a mitigation strategy, the Activities' Working Group (WG) decided to support the acceleration of activities with potential impact through the financing of certain activities. Six activities were supported for acceleration: the 1st Town Hall Meeting of the State of Quintana Roo in 2018, and for 2019, activities from Campeche, Chihuahua, Oaxaca, Tlaxcala, and Veracruz (UNDP, 2018; UNDP, 2018a; UNDP, 2019a). It is too early to assess the results from these activities, but challenges remain—each fellow will need to look for technical, human, and financial resources, and no institutional backup is in place. Although all activities incorporate a logic of open government, not all of them are directly related to integrity, accountability, and transparency practices.

As part of the interventions to strengthen the LTS, in 2017 the Working Group developed a diagnosis in four states (Sonora, Morelos, Nuevo León, and Oaxaca); results were presented with opportunities and recommendations to improve their functioning. Chihuahua installed its LTS in 2018 and started drafting its first LAP—according to the documentation, fellows assisted in the drafting, although interviewees have stated that this was not the case (C54). For the states of the 2018 program, there was some delay and by the end of that year only seven were visited to present the work and support the fellow's activities. According to the reports, the delay was due to the lack of conditions in the states for open government initiatives or lack of existence of LTS. In a final survey applied by UNDP, answered by 6 out of 15 LTSs, all 6 assessed the actions to strengthen the LTS as useful (UNDP, 2019e), but no further evidence is reported on the actual application of what was learned or the recommendations made by UNDP and INAI. On the other hand, an interviewee reported that training and workshops were not tailored to the LTS needs (C54). For example, in Chihuahua, UNDP and INAI wanted to organize forums, but these had already taken place and the LTS had already identified actions and the main topics to work on over the following months (C54). Also, Local Transformative Agents and their Local Action Plans were not in line

with the identified topics and actions (C54). Finally, all six LTSs reported to have involved fellows either by inviting them to attend meetings or considering their initiatives in the LAPs (UNDP, 2019e); but only two states, Oaxaca and Veracruz, integrated the fellows' initiatives —thanks to personal relations between fellows and members of the LTS (C106).

### *Component 2. Strengthening Transparency at the Federal and Subnational Level in Mexico*

The content and online course on integrity for public officials were developed as planned and the pilot course had 62 participants, of which 58 completed the course (exceeding the activities' target of 50). The migration of the course to the MPA system is expected to be completed in 2019. The new representatives of the MPA are interested in offering the online course to all federal public officers but requested adjustments to the contents. According to the interviews and documentation (C39; UNDP, 2019a), the skills development program is currently being implemented for 500 public officials and MPA has shown interest in getting to all public-sector employees.

To carry out the business integrity program, a Business Working Group (BWG) was installed in October 2017, with the participation of business chambers and professional associations. According to UNDP's reports (UNDP, 2018; UNDP, 2019), the five products expected were developed (codes of conduct and ethics for small and medium enterprises, SMEs), and six workshops took place between August and November 2018, where 73 SMEs were trained on the integrity program, exceeding the activities' target of 50. Trade associations socialized the sample codes and are working with the trade groups to encourage implementation by the SMEs. In 2019, the BWG held a meeting to discuss sustainability strategies and the evaluation methodology is being developed for the companies trained on the 2018 integrity program. In addition, UNDP has established a partnership with the Secretaría Ejecutiva del Sistema Nacional Anticorrupción (SESNA) to replicate the contents of the business integrity program in the risk units at the subnational sphere (UNDP, 2019a).

UNDP implemented the Co-responsibility Fund (Fondo de Corresponsabilidad): 75 proposals were received and 25 of them were selected for a first workshop (three-day workshop to build proposals). From them, 8 proposals from 10 CSOs were selected for funding, technical assistance, and accompaniment (no target was set up at the beginning of the activity). The grantees work on small initiatives related to transparency and/or anti-corruption at the state or municipal levels. In March 2019, a National Anti-corruption Network was launched, mainly with the CSOs benefited from UNDP's call, and the Activity's team provided a workshop on capacity-building and tools to strengthen the Network. The Network was not planned from the outset, but rather an unexpected positive outcome. Five out of 10 CSOs answered a final survey, and all agreed on the importance of UNDP's actions on building local civil society capacities and on creating a bridge with SEA's institutions (UNDP, 2019e).

Public officers from 13 federal agencies, 27 federative states, and 9 municipalities registered information in the IPRO platform: 604 social programs and actions had been captured, from which 45 were from the federal level (from 13 federal agencies), 520 from the state level, and 15 from municipalities. The IPRO target was set at 3,000 programs; however, according to the documentation, the intervention has been halted given the national and local context of new governments.

Finally, MPA has asked UNDP for help designing a "Probity Certification" to assess and certify private sector businesses working with the federal government. This work was not included in the initial objectives and is currently starting (USAID, 2019).

**Table 17. UNDP Planned Activities vs. Implemented Activities**

| Planned Activities                                                                                                                | Implemented            | Ongoing | Changed | Comments                                                                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------------------|------------------------|---------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>COMPONENT 1</b>                                                                                                                |                        |         |         |                                                                                                                                                                                                  |
| Activity 1.1 Capacity development program                                                                                         | X                      |         |         |                                                                                                                                                                                                  |
| Activity 1.2 Identification of transformative agents                                                                              | X                      |         |         |                                                                                                                                                                                                  |
| Activity 1.3 Execution of the capacity development program (Fellowship)                                                           | X                      |         |         |                                                                                                                                                                                                  |
| Activity 2.1 Design, programming, and development of the online platform                                                          | X                      |         |         |                                                                                                                                                                                                  |
| Activity 2.2 Launch of the online platform for the open government transformative agents                                          | X                      |         |         |                                                                                                                                                                                                  |
| Activity 2.3 Participatory and innovative identification of national challenges through the platform                              | X                      |         |         |                                                                                                                                                                                                  |
| Activity 3.1 Integration and consolidation of the Local Transparency Secretariats (LTS)                                           |                        |         | X       | Not implemented. As a mitigation strategy, UNDP developed an acceleration strategy for selected fellows.                                                                                         |
| Activity 4.1 Technical advice and support in the design and implementation of open government Local Action Plans (LAPs)           | *not fully implemented |         |         | Some diagnoses were conducted with recommendations, and some states were visited to offer technical advice, but there is no evidence of actual support in the design and implementation of LAPs. |
| Activity 4.2 Development of indicators and a local performance model of evaluation in open government and sustainable development | *not fully implemented |         |         | No evidence that all integrated LTS are including these indicators in their LAPs.                                                                                                                |

| Planned Activities                                                                                               | Implemented | Ongoing | Changed | Comments                                                                                                                               |
|------------------------------------------------------------------------------------------------------------------|-------------|---------|---------|----------------------------------------------------------------------------------------------------------------------------------------|
| <b>COMPONENT 2</b>                                                                                               |             |         |         |                                                                                                                                        |
| Activity 1.1 Implementation of the program for public officials                                                  |             | X       |         | MPA is interested in applying the capacity-building program to all public officers.                                                    |
| Activity 1.2 Implementation of the program for members of the private sector                                     | X           |         |         | Objectives were achieved, but there are still talks with SESNA and other actors in the BWG to replicate the capacity-building program. |
| Activity 1.3 Investigation of best practices in integrity programs in the private sector                         | X           |         |         |                                                                                                                                        |
| Activity 2.1 Creation of a fund to support subnational activities to prevent practices that are not transparent. | X           |         |         |                                                                                                                                        |
| Activity 2.2 Relaunching the IPRO platform to strengthen the institutionalization of social policy               |             | X       |         | IPRO platform efforts have been halted. Target has not been met.                                                                       |

## Benchmarks

Changes were made to Component 1 (Open Government) indicators after implementation and challenges faced during 2017. All indicators related to Local Action Plans commitments were not measured for 2017 since Sonora, Morelos, Nuevo Leon and Oaxaca started the process of designing new Local Action Plans while the fellowship was still ongoing; and Chihuahua was on the process of defining its first Local Action Plan after the installation of the Local Technical Secretariat in February 2018. In Component 2, no targets were defined for 2017.

**Table 18. UNDP Indicators**

| Indicator                                                                                                                                                                                                                                                                                                                                                  | Target                     | Actual                      | Percent |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-----------------------------|---------|
| <b>Component 1</b>                                                                                                                                                                                                                                                                                                                                         |                            |                             |         |
| Number of subnational entities receiving USG assistance that improve their performance in national transparency indicators<br><br><i>Indicator under review: improvement on performance measured on the Open Government Metric, developed by INAI. This indicator is biannual and would be available in 2019. No information on its approval by USAID.</i> | 15                         | 5                           | 33%     |
| Percentage of participants who successfully completed the capacity-building program (20 fellows as total)                                                                                                                                                                                                                                                  | 100% (2017)/<br>80% (2018) | 90% (2017)/<br>92.5% (2018) | 105%    |
| Number of government officials receiving USAID-supported anti-corruption, open government, and sustainable development training*<br><i>*Indicator not included in initial M&amp;E plan.</i>                                                                                                                                                                | No target set              | 10                          | 100%    |
| Number of active users of the online platform compared to the participant fellows in the capacity-building program                                                                                                                                                                                                                                         | No target                  | 90%                         | 90%     |
| Percentage of female active users of the online platform compared to the participant fellows in the capacity-building program                                                                                                                                                                                                                              | 50% (2017)/<br>50% (2018)  | 45% (2017)/<br>47.5% (2018) | 92%     |
| Percentage of male active users of the online platform compared to the participant fellows in the capacity-building program                                                                                                                                                                                                                                | 50% (2017)/<br>50% (2018)  | 55% (2017)/<br>45% (2018)   | 100%    |
| Number of civil society organizations receiving USG assistance engaged in advocacy interventions*<br><br><i>*Indicator not included in the initial M&amp;E plan</i>                                                                                                                                                                                        | No target set              | 27                          | 90%     |
| Learning contents for capacity-building program generated (2 seminars and 1 online course)                                                                                                                                                                                                                                                                 | 1                          | 1                           | 100%    |
| Geographical distribution of the fellows and the users of the online platform                                                                                                                                                                                                                                                                              | 15                         | 15                          | 100%    |
| Fellows completing capacity-building program                                                                                                                                                                                                                                                                                                               | 60                         | 55                          | 92%     |
| Number of national or regional Sustainable Development challenges identified through the online platform to be processed through the Local Action Plans                                                                                                                                                                                                    | 10                         | 10                          | 100%    |

| Indicator                                                                                                                                                                                                                                                                                                                                                         | Target                           | Actual                             | Percent |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|------------------------------------|---------|
| <b>Component 1</b>                                                                                                                                                                                                                                                                                                                                                |                                  |                                    |         |
| Number of national or regional sustainable development challenges processed through the Local Action Plans                                                                                                                                                                                                                                                        | 8                                | 0                                  | 0%      |
| Percentage of users with a positive perception of the online platform                                                                                                                                                                                                                                                                                             | 60%                              | 80%                                | 80%     |
| Percentage of users with a positive perception of the online platform (female)                                                                                                                                                                                                                                                                                    | 60%                              | 45%                                | 45%     |
| Percentage of users with a positive perception of the online platform (men)                                                                                                                                                                                                                                                                                       | 60%                              | 35%                                | 35%     |
| Percentage of participants who successfully created and executed collaborative initiatives through the capacity-building program*<br><br><i>* Indicator under review. Since the program consisted of teamwork between the fellows from each state, all the fellows who developed advocacy plans for their states are considered as collaborative initiatives.</i> | 100%                             | 92.5%                              | 92.5%   |
| Percentage of female participants who successfully created and executed collaborative initiatives through the capacity-building program                                                                                                                                                                                                                           | 100%<br>(2017)/<br>50%<br>(2018) | 100%<br>(2017)/<br>47.5%<br>(2018) | 97.5%   |
| Percentage of male participants who successfully created and executed collaborative initiatives through the capacity-building program                                                                                                                                                                                                                             | 100%<br>(2017)/<br>50%<br>(2018) | 100%<br>(2017)/<br>45%<br>(2018)   | 95%     |
| Percentage of participants of the capacity-building program who successfully created and executed commitments through Local Action Plans                                                                                                                                                                                                                          | 100%                             | 0                                  | 0%      |
| Percentage of female participants of the capacity-building program who successfully created and executed commitments through Local Action Plans                                                                                                                                                                                                                   | 100%                             | 0                                  | 0%      |
| Percentage of male participants of the capacity-building program who successfully created and executed commitments through Local Action Plans                                                                                                                                                                                                                     | 100%                             | 0                                  | 0%      |
| Percentage of final open government activities that are successfully integrated into Local Action Plans                                                                                                                                                                                                                                                           | 20%                              | 0                                  | 0%      |
| Percentage of Local Action Plans that contain specific, measurable, assignable, realistic, and related commitments directed at addressing sustainable development and corruption challenges                                                                                                                                                                       | 20                               | 0                                  | 0%      |
| Number of mechanisms for external oversight of public resources implemented as a result of USAID assistance*<br><i>*Indicator not included in the initial M&amp;E plan.</i>                                                                                                                                                                                       | 0                                | 0                                  | 0%      |
| Number of subnational entities receiving USG assistance to improve their performance and straighten transparency*                                                                                                                                                                                                                                                 | 10                               | 7                                  | 70%     |

| Indicator                                                                                         | Target | Actual | Percent |
|---------------------------------------------------------------------------------------------------|--------|--------|---------|
| <b>Component 1</b>                                                                                |        |        |         |
| <i>*Indicator not included in the initial M&amp;E plan.</i>                                       |        |        |         |
| Gaps of integration of vulnerable groups within Local Technical Secretariats*                     | 100%   | 0      | 0%      |
| <i>*Indicator not included in the initial M&amp;E plan and under review (Annual Report 2018).</i> |        |        |         |

|                                                                                                                                                                                                                                                                                                                                                                                       |           |     |        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----|--------|
| <b>Component 2</b>                                                                                                                                                                                                                                                                                                                                                                    |           |     |        |
| Learning contents for capacity-building program designed                                                                                                                                                                                                                                                                                                                              | 1         | 1   | 100%   |
| Capacity-building program implemented                                                                                                                                                                                                                                                                                                                                                 | 1         | 1   | 100%   |
| Number of public officials participating in the capacity development program to promote ethics, public integrity, and prevention of conflicts of interest<br><br><i>Target revised. UNDP Annual Report 2017 set the target for Y2018 at 500 public officials; the figure reported here comes from Annual Report 2018, where UNDP set the target for Y2018 at 50 public officials.</i> | 50        | 62  | 103%   |
| Percentage of participants who successfully completed the capacity-building program                                                                                                                                                                                                                                                                                                   | 100%      | 95% | 95%    |
| Percentage of participants who successfully changed their perceptions about the risks, causes, and motivations of individuals to engage in illegal conducts and acts of corruption<br><br><i>*The question was not explicitly asked on the final evaluation. However, most of the comments were positive to the contents and functionality of the platform</i>                        | 100%      | 0%* | 0%     |
| Number of companies that implemented an integrity program                                                                                                                                                                                                                                                                                                                             | 50        | 73  | 146%   |
| Number of CSOs participating in the program to implement anti-corruption actions                                                                                                                                                                                                                                                                                                      | No target | 10  | 100%   |
| Number of CSO proposals to implement anti-corruption actions financed by the activity                                                                                                                                                                                                                                                                                                 | No target | 8   | 100%   |
| IPRO platform has been re-launched and is operating                                                                                                                                                                                                                                                                                                                                   | 100%      | 1   | 100%   |
| Percentage of governments that register their social programs                                                                                                                                                                                                                                                                                                                         | 3,000     | 604 | 20.13% |

## Main Findings

### *Results*

Key informants agreed that the most significant changes resulting from the Activity are the CSO's National Anti-corruption Network (under Component 2) and the Transformative Local Agents Network (under Component 1) (C7, C25, C39, C93, C106, C120, C129, C132). These networks were an unforeseen outcome but, according to informants, could help the organizations and agents to gain visibility, exchange information and practices, and get media attention to press for changes. Also, anti-corruption issues have been captured by few organizations at the center of the country. The activity allowed both UNDP and USAID to expand its contacts with local grassroots organizations and key agents around the country.

In the case of the CSOs, according to key informants, the intervention allowed the opening of new spaces of collaboration in places where there is weak engagement of civil society in anti-corruption advocacy and to build bridges between CSOs and the government. Interviewees report that the intervention was key to understanding State Anti-corruption System real capabilities, particularly those of the CPCs and for the CPCs, in turn, to recognize that they need to go beyond the law and listen to citizens' demands (C129). Among the CSOs answering a final survey (5 out of 10), all stated that the intervention built local capacities, and reported having adequate and moderately adequate influence on SEAs institutions (UNDP, 2019e). It is still too early to conclude how effective these actors will be in pressing for changes, but so far, these organizations have been working collaboratively with government institutions, particularly the CPC, where there had not been any previous communication (C7, C129, C148; UNDP, 2019e). UNDP's close follow-up, technical expertise, and USAID's convening authority through UNDP were relevant factors in effectively implementing this intervention (C7, C39, C129).

Another significant change reported by interviewees in Component 2 was getting to the private sector, particularly small businesses that lack integrity and transparency policies (C132). The Business Working Group (BWG) consists of over 20 representatives of chambers of commerce and companies, which increases the reach of the intervention and the chances of having a cascading effect. The Business Working Group oversaw and produced course materials—mainly codes of conduct and ethics for small and medium enterprises (SMEs)—which allowed UNDP to adapt the intervention to beneficiary needs (UNDP, 2018; UNDP, 2019a). Although it is too early to determine what the participants will do with the training, the intervention achieved its targets and key informants (C39, C132) stated that one of the most significant changes is that it reached a new business sector audience that previously lacked integrity and transparency policies. As of October 2019, the Business Working Group and SME members were actively implementing actions to institutionalize learning by integrating their associates through training (UNDP, 2019e).

Component 1 tried to replicate the Open Government Partnership model at the subnational level by building capacities of subnational institutions and promoting civil society's demand for co-creation spaces but failed to engage local institutions. Although effectively training Local Transformative Agents, this component encountered challenges to integrate them and their projects into the Open Government Local Technical Secretariats (LTSs). One stated reason was that not all LTSs were consolidated by the time of implementation, or there were political conflicts among different vital players (between LTS commissionaires or between them and INAI) that prevented them from incorporating citizens' proposals in their agendas (C25, C106; UNDP, 2017; UNDP, 2018).

Another reason stated by informants was the lack of incentives from local transparency institutions to collaborate with the intervention and the fact that it was not tailored to the LTS needs (C54, C93). Lack of flexibility to adjust to the local political realities added to coordination problems, because both INAI and UNDP "owned" the intervention and their visions and priorities did not always match (C25, C39, C106).

Besides, open government initiatives were too broad and not always had a direct link to anti-corruption issues. For example, one of the fellows who joined the SEA after the completion of the capacity development program has not been able to put in practice what she learned because open government is not a priority for the institutions (C71). As a result, UNDP's intervention failed to create spaces for joint civic-government policy development.

On the other hand, while the Transformative Agents Network is certainly a positive outcome and it is already working on five strategic activities, its sustainability will depend on its capacity to secure resources and establish a clear leadership (C25).

## Factors Affecting the Activity

**Table 19. UNDP Factors Affecting the Activity**

| Internal                                                                                                                        | External                                                                                                                              |
|---------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| ✓ Work closely with fellows and acceleration strategy – Component 1                                                             | ✓ UNDP convening authority – Component 1 and Component 2                                                                              |
| ✓ Identification of local grassroots CSOs, building their capacities and fostering their work with the government – Component 2 | ✓ Demand for capacity-building given the SMEs' limited knowledge of anti-corruption, integrity, and transparency issues – Component 2 |
| ✓ Activities' flexibility and UNDP's leadership – Component 2                                                                   | ✗ LTS local conditions (mainly political) – Component 1                                                                               |
| ✗ Activity governance and lack of flexibility – Component 1                                                                     |                                                                                                                                       |
| ✗ LTS engagement not aligned to needs – Component 1                                                                             |                                                                                                                                       |
| ✗ UNDP's administrative processes – Component 1 and Component 2                                                                 |                                                                                                                                       |

Regarding internal factors, informants stated that strength of Component 2 was identifying local grassroots organizations and building their capacities, while also fostering their work with local institutions (C39, C132). For Component 1, interviewees stated that the acceleration strategy and working closely with the fellows were also strengths of the intervention (C71, C93, C120).

In terms of the Activity design and operation, Component 2 was more flexible than Component 1, and UNDP established more leadership in Component 2. This impacted the Local Transformative Agents program—it was more difficult for it to adapt to unforeseen situations, particularly the aforementioned challenges encountered in the Local Transparency Secretariats, and resulted in coordination problems because both INAI and UNDP “owned” the program and their visions and priorities did not always match (C25, C39, C106).

In both components, delays were reported due to UNDP's administrative requirements and human resources availability. For Component 1, key informants stated that personnel rotation and the need to hire consultants delayed the processes. In contrast, for Component 2, key informants encountered administrative and logistical problems, as well the burden imposed by UNDP's rules (C7, C25, C129).

Finally, informants stated that UNDP's convening authority was key to opening up the doors at both the national and the subnational levels (C7, C25, C39, C129). Nonetheless, challenges were encountered by national and local elections, particularly with the Ministry of Public Administration (MPA), where key actors changed resulting in the need to reestablish relations, help the new team to familiarize with the activities, and develop an alignment strategy with the new government's priorities (C39).

## Lessons Learned

Lessons learned from the design phase in Component 1 point at having a more careful selection of the states to intervene, choosing five “champions” and when attained, moving forward to other states, as well as being careful with budget calculations and indicators. In this case, according to a key informant directly involved in the design and implementation (C93), these were not realistic and put pressure on the intervention.

Local transparency institutions were initially foreseen as the main stakeholders in the states for Component 1. However, as has been explained, each state had its own timing and did not necessarily match with the execution of the intervention; there was a lack of incentives for cooperation in some states or the LTS had not been established. More flexibility would have been required to adapt objectives, goals, and monitoring instruments, based on the existing conditions in each state, as well as identifying and properly engaging new actors at the local level to drive the efforts. It is worth noting that challenges for engaging LTSs were already identified in the midterm evaluation conducted by UNDP, but no successful mitigation strategy was implemented.

Component 1 resulted from a USAID workshop to co-create activities, join efforts, and avoid duplication of activities. Although positive outcomes would have been expected, governance mechanisms for the component were not in place. Both INAI and UNDP “owned” the program and their visions and priorities did not always match, which led to coordination problems. Although in some cases, having a horizontal structure among partners might be appropriate, strong leadership and governance mechanisms must be in place when co-creating activities.

In both Components delays were reported due to administrative requirements and human resources availability. For Component 1, key informants stated that personnel rotation and the need to hire consultants delayed the processes (hiring could take up to three months) and prevented organizational learning (C25). For Component 2, key informants encountered administrative and logistical problems, as well as lack of clarity in UNDP’s rules (C129).

Finally, interventions relied more on UNDP’s convening authority than that of USAID. As opposed to other activities under USAID’s portfolio, they did not face reluctance from CSOs or government institutions to work with them.

### *Sustainability*

Although INAI would naturally be the institution inheriting the Open Government component, key informants have stated that an appropriate closure has been missing. In essence, a conclusion and lessons learned session had not taken place, neither had a discussion on next steps and how to sustain the results (C25, C120). It’s possible the Transformative Local Agents Network will be the one leading these efforts, but challenges remain because it will need human, technical, and financial resources, as well as institutional backup. Fellows also reported the need of technical assistance, accompaniment, and institutional backup to sensitize authorities on open government and promote trust to open spaces for dialogue to continue with their initiatives (UNDP, 2019e).

Regarding Component 2, the MPA has already shown interest in continuing with the online course as well as implementing a “Probity Certification” program for private companies; UNDP has established a partnership with the SESNA to replicate the contents of the business integrity program in the risk units at the subnational sphere (UNDP, 2019a). Some BWG members have also stated to have sustainability plans through training and replication, and have stated the importance of adopting a certification program and having permanent support and positive incentives, such as publicizing companies adhering to integrity standards, to continue advancing on integrity and sustain results (UNDP, 2019e).

## Conclusions

The Activity's components were quite different from each other and the evaluation team found no evidence of synergies between them. They were also conceived differently: Component 1 was formulated during USAID's session of co-creation and jointly planned with its main counterpart, INAI. In contrast, Component 2 was conceived afterwards, as a response to a USAID request. These differences are reflected in the flexibility of the components (Component 2 was more flexible) and in the internal management of the activity (Component 1 was more horizontal in the decision-making process, while Component 2 had clearer leadership). Allies and target groups at the subnational level also differ greatly in terms of their consolidation: while most LTSs were yet to be appropriately integrated, allies for Component 2 were already consolidated.

Differences such as these do not necessarily negatively impact an Activity's performance. However, in this case, they indicate that flexibility, leadership, and adequately identifying allies and beneficiaries as well as their interests, capabilities, and engagement strategies should be carefully considered from the outset of the activities.

## ***Mapping Corruption, Network Analysis from Budget Allocation to School Services – Instituto Mexicano para la Competitividad***

### Introduction

Mapping Corruption is an activity created by *Instituto Mexicano para la Competitividad* (IMCO) with *México Evalúa* as a sub-grantee. The estimated cost is 602,000 USD, and the implementation occurred in two northern states: Chihuahua and Nuevo León. The activity was initially planned as a three-year project, starting in October 2016 and finishing in October 2019, but extended until March 31, 2020, with USAID approval (IMCO, 2019g). The primary purpose is to identify trends and risk factors in government practices that could lead to corruption in education equipment and public-school infrastructure procurement processes.

### Background

The activity was designed when Mexican states had the mandate to establish a local anti-corruption system, given the regulatory framework created by the SNA. At the same time, Nuevo León's (2015) and Chihuahua's (2016) newly elected governors considered corruption as a priority issue in their agendas. At that moment, IMCO pitched Mapping Corruption as a tool aiming to increase the effectiveness of auditing agencies in detecting risks of corruption through the use of a statistical model named the Corruption Risk Index.

Thus, IMCO signed a collaboration agreement with Javier Corral, Governor of Chihuahua (2016), and *México Evalúa* with Nora Cantú, former Comptroller of Nuevo León, and Arturo Estrada, former Secretary of Education (2017). The implementing partners established partnerships with local CSOs that helped to digitize documents and to analyze procurement processes taking advantage of their local insight and firsthand experience. IMCO collaborates with the Council for Economic Development of the state of Chihuahua (CODECH) in Chihuahua, and *México Evalúa* is working primarily with *Consejo de Nuevo León* (CONL).

**Table 20. Mapping Corruption Stakeholders**

| Name                                                                               | Role                                                                                                                                                                                                                                                                                                                             |
|------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ministry of Public Administration (MPA) – Chihuahua                                | The primary point of contact, with power and willingness to cooperate, the former Secretary Stephanie Olmos was a key actor until her resignation. The governor appointed Mónica Vargas as the new Secretary, and she agreed to continue with this activity implementation.                                                      |
| Chihuahuan Institute of Educational Physical Infrastructure (ICHIFE)               | A decentralized public institute that regulates, supervises, and evaluates the construction rehabilitation and equipment of the public education sector. For the implementation, they designated an official liaison to work directly on IMCO requests.                                                                          |
| Secretariat of Public Education (SEP) – Chihuahua                                  | The government authority that oversees the development and implementation of the national education policy in Chihuahua.                                                                                                                                                                                                         |
| Council for Economic Development of the state of Chihuahua (CODECH)                | Local CSO ally, assisted IMCO on digitalization and analysis of procurement processes, providing insights into the nature of corrupt practices.                                                                                                                                                                                  |
| Secretariat of Public Education (SEP) – Nuevo León                                 | The government authority that oversees development and implementation of the national education policy in Nuevo León. Arturo Estrada, Secretary of Education, signed an official collaboration agreement with México Evalúa.                                                                                                     |
| Comptroller and Government Transparency of the State of Nuevo León                 | The Comptroller's office has the authority to request information from any relevant local agency. The former Secretary, Nora Cantú, signed a collaboration agreement with México Evalúa; the relationship was complicated since the beginning.                                                                                   |
| Institute of Educational and Sports Physical Infrastructure of Nuevo León (ICIFED) | A decentralized public institute that regulates, supervises, and evaluates the construction rehabilitation and equipment of the public education sector. This Institute had already digitized 60 percent of the information needed, but it was complicated to obtain the other 40 percent because of the lack of political will. |
| Consejo Cívico de las Instituciones en Nuevo León (CCINL)                          | Local CSO ally that helped to pressure local authorities to collaborate as agreed with México Evalúa.                                                                                                                                                                                                                            |
| Consejo de Nuevo León (CONL)                                                       | Civil Society/Private entity created by mandate of the Development Law in Nuevo León. I mainly worked with the Transparency and anti-corruption Commission.                                                                                                                                                                      |

## **Description of the Activity**

The activity is an effort to create an analytical tool that may facilitate preventing corruption and provide better-targeted auditing processes to reduce corruption opportunities during the tendering process. The initial outcome was to develop a methodology for network analysis to avoid corrupt practices tried on school infrastructure services (IMCO, 2017d); the team then recognized the importance of automatizing the analysis process, thus the online platform was added. In the end, the Index will create a road map with preventive flags supporting the future creation of local consolidated procurement platforms (C12, C51, C66).

## **Objectives and Components**

The activity had two goals: to provide a methodology to detect corrupt practices in the public procurement process, and to increase awareness of corrupt practices in public procurement. The activity had the following two components:

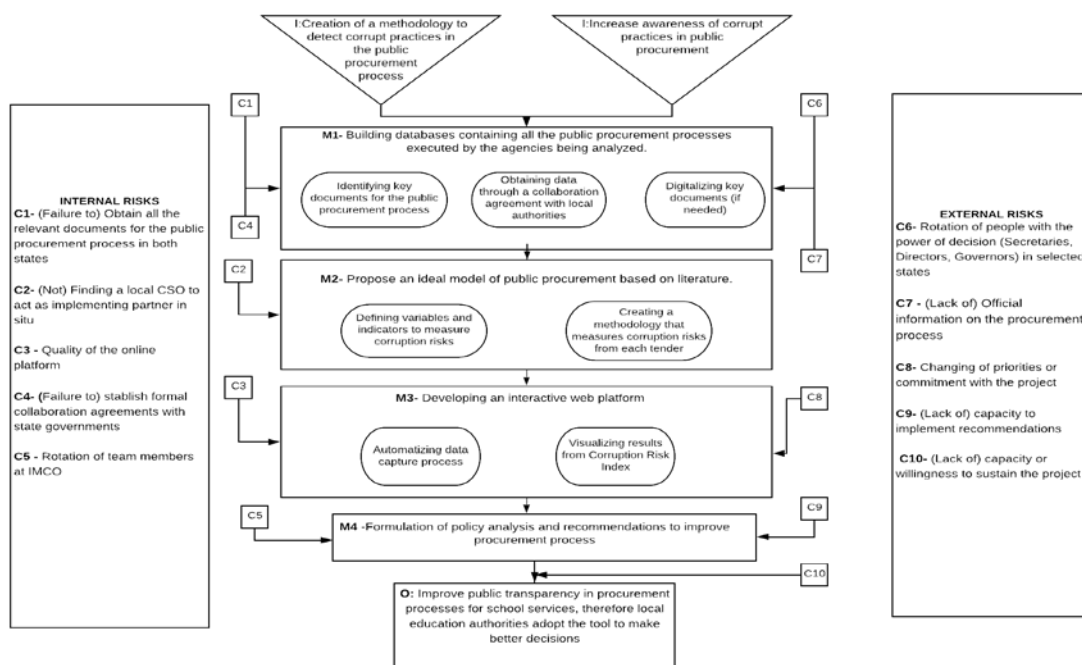
- Corruption Risk Index: Creation of a methodology to detect risk factors of government practices that could lead to acts of corruption in the public procurement process.
- Online platform for the Corruption Risk Index: Increase awareness of corrupt practices in public procurement by automating the data processing. This component was modified during implementation.

## **Theory of Change Evaluation**

The evaluation team has articulated a Theory of Change based on the documents, reports of the activity, and from interviews. The main identifiable interventions are I: Intervention, M: Mechanism, and O: Outcome. Context factors, which represent internal and external risks and appear on the sides, are used to analyze potential factors that could affect the activities' development.

*Theory of Change:* IF trends and corruption risk factors are identified AND communicated to raise awareness among GOM, CSO, and citizens, THEN transparency on educational infrastructure will be strengthened and sustained.

**Figure 6. Theory of Change – Mapping Corruption, Network Analysis from Budget Allocation to School Services**



The internal risk factors were around the team’s capacity to obtain enough information—or overcome the lack—to establish a cooperative relationship with GOM key entities and local CSOs as allies, and to ensure the creation of an accessible platform. Meanwhile, the external risks focused on public counterparts’ willingness to make and sustain Mapping Corruption as a priority by generating—or not—the data needed and adopting the implementing partner recommendations to improve.

## Design Analysis

### *Anti-Corruption Approach*

The approach to corruption is a mix of economic and neo-institutional frameworks. It focuses on lowering the profits and increasing the risks of corrupt acts using the information generated by the Corruption Risk Index, but it also tries to improve transparency by monitoring the procurement process and providing evidence-based recommendations to improve state procurement processes.

### *Alignment to USAID’s Development Objective and Intermediate Results*

Mapping Corruption interventions were aligned to USAID’s Development Objective (DO) and contributed to improving GOM accountability and transparency, particularly by developing an electronic platform along with a methodology for better monitoring of public procurement processes (IRs 3.3.1.2 and 3.3.2.2). The interventions also increased professionalism and impartiality in GOM audit functions (IR 3.3.1.3) with the methodology available for public institutions and CSOs.

### *Alignment to USAID’s Local Systems Framework*

There is neither acknowledgment of Local Systems Framework (LSF) in the activities’ documentation, nor stated knowledge of it by the implementing partners. Nonetheless, some characteristics move toward

this approach. In broad terms, the activity focuses on enhancing capacities to better auditing process through data availability and catalyzing behaviors such as citizen auditing, cooperative relationships between auditing authorities and local CSOs, and performance, which is in line with LSF.

GOM actors were not sufficiently engaged in Nuevo León (C12, C51; IMCO, 2018e), and the lack of flexibility or adjustments in response to authorities' uncooperative attitude were problems during the implementation of the activity. The consequence was that the implementation partner was sidelined and was not able to push its recommendations effectively, hindering the possibilities of influencing local systems. Instead, in Chihuahua, cooperation was fluent between IMCO and public entities involved.

#### Local Systems Framework:

- **Results:** The implementing partner achieved the results proposed by creating a robust methodology piloted with more than 3,000 procurement processes in two states (IMCO, 2019f).
- **Roles:** IMCO performed the most influential role as steward of the intervention, along with acting as a broker, technical assistance, and researcher. *México Evalúa* was the expert stakeholder on education, while the roles played by the counterparts in GOM were a rich source of information, and civil society had a vital role during implementation.
- **Relationships:** All relationships with GOM entities were formalized by signing cooperation agreements. However, GOM actors were not sufficiently engaged in Nuevo León and did not comply with giving the information until CSOs applied public pressure. In Chihuahua, the engagement was strong enough to keep going despite the rotation in MPA leadership, but eventually left out CODECH from the table, even though IMCO played an active role as steward and broker during the life of the activity (IMCO, 2018).
- **Rules:** The official rules were set by a cooperation agreement signed between implementers and GOM authorities but that wasn't enough to enforce in Nuevo León (IMCO, 2018). In this case, it was necessary to request the information through the transparency platform and appeal resources.

## Implementation Review

**Table 21. Mapping Corruption Planned Activities vs. Implemented Activities**

| Planned Activities                                                                   | Implemented | Ongoing | Changed | Comments                                                                                              |
|--------------------------------------------------------------------------------------|-------------|---------|---------|-------------------------------------------------------------------------------------------------------|
| 1. Creation of a methodology for the Corruption Risk Index                           | X           |         |         | Completed                                                                                             |
| 2. Creation of final results and recommendations report for Chihuahua and Nuevo León |             | X       |         | Final Stages                                                                                          |
| 3. Creation of a Citizens' Guide to Mapping Corruption                               |             | X       |         | Final Stages                                                                                          |
| 4. Creation of a Web Platform and User's Guide                                       |             | X       |         | The user's guide is finalized.<br>The web platform was modified to automatize the Index calculations. |
| 5. Build capacities within CSO                                                       |             |         | X       | Additional activity planned                                                                           |

At the time of the evaluation, all four activities have been started and reported significant progress; the Corruption Risk Index—known as the methodology Annex in some reports—is already finished and automatized in the soon-to-be-released online platform, as of October 2019 (C12, C51, C89). Meanwhile, the final reports for Chihuahua and Nuevo León are still under revision, as well as the public version of the Citizen's Guide to Mapping Corruption to be ready by the end of 2019. Finally, during the last three months of the activity, there will be capacity-building sessions with local public officials and CSOs to train them in the use of the Index and the platform (C12; IMCO, 2019g).

The adjustments to the planned timetables were necessary given the time required to manually scan 4 out of 10 necessary documents from 2012 to 2016, and to the reluctance of Nuevo León's officials to provide the necessary information (IMCO, 2017c). Furthermore, developing the automated system required to apply the Index is taking longer than expected, approximately an extra three months (C12, C128; IMCO, 2017g).

## Benchmarks

IMCO and México Evalúa made significant progress as reflected in their indicators. But because of time restrictions, it was difficult to get new states on board, even though they already have many expressions of interest from other states (for example Colima, Quintana Roo, and Sonora) (C12; IMCO, 2019f).

**Table 22. Mapping Corruption Indicators**

| Indicator                                                                                               | Target | Actual | Percent |
|---------------------------------------------------------------------------------------------------------|--------|--------|---------|
| Number of audit processes using the activity's methodology in the states of Chihuahua and Nuevo León    | 2      | 2      | 100%    |
| Number of state governments using the methodology                                                       | 6      | 2      | 33%     |
| Number of civil society organizations involved in the implementation of the methodology                 | 4      | 6      | 67%     |
| Number of civil society organizations (CSOs) receiving USG assistance engaged in advocacy interventions | 2      | 2      | 100%    |
| Number of mechanisms for external oversight of public resource use supported by USG assistance          | 2      | 2      | 100%    |

## **Main Findings**

### *Results*

The implementing partner created and digitized datasets previously available only on paper. In Chihuahua, this required scanning 5,430 documents with data from 2014 to 2017, covering 1,247 procurement processes and in Nuevo León scanning 3,500 documents from 588 procurement processes using the methodology (IMCO, 2019c).

The key informants agreed that the most significant changes produced were developing an innovative methodology as a preventive and proactive mechanism to improve processes besides audits (C51, C92, C144). The main result of this activity has been the simplification of the process of analysis of public procurement processes with only 10 key documents (C12; IMCO, 2018a). Chihuahua asked for further support to incorporate the methodology in its new consolidated procurement platform (IMCO, 2018e).

Even though the platform was not public by the time the evaluation concluded, it was partially effective. The platform is on hold, at least in Nuevo León, due to the changes in counterparts' priorities that were a significant obstacle at the local levels, in the current administration. It suffered important delays because of the reluctance of Nuevo León's authorities to share key information.

### *Factors Affecting the Activity*

Two internal factors facilitated the implementation of the intervention. First, IMCO convened authority among local CSOs and previous collaborations with CODECH in Chihuahua (C92) and *México Evalúa* with *Consejo de Nuevo León*. Second, the Corruption Risk Index proved to be a robust methodology useful for public procurement processes, not related only to education. However, the primary internal constraint was the inadequate estimation of the workload derived from digitizing official documents and from double-checking the information to ensure data quality (C12, C92).

On the other hand, IMCO's Mapping Corruption profited from the anti-corruption agenda momentum boosted by the SNA framework to move forward with the activity (C23, C66, C74).

The external factors were primarily constraints for the activity because the participating public institutions did not have consolidated data, installed procurement systems, or digital formats. The favorable external factor was the momentum of the anti-corruption agenda impulse by previous governors' scandals on corruption and the SNA creation (C23, C66, C74).

Authorities were also reluctant to share needed information, leading México Evalúa to ask for it through transparency channels (Comptroller and Government Transparency of the State of Nuevo León). Authorities stopped all sorts of communication with IMCO (C12, C51).

In the case of IMCO, the former Head of the MPA Chihuahua pushed forward the adoption and implementation of the intervention in Chihuahua. However, the pace of execution slowed after she left (IMCO, 2019f).

**Table 23. Factors Affecting Mapping Corruption**

| Internal                                                                                                   | External                                                                                                                 |
|------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| ✓ IMCO's convening authority among Mexican state governments and CSOs (C12, C51)                           | ✓ Anti-corruption agenda momentum propelled by the NAS framework (C51, C92; IMCO, 2017d)                                 |
| ✓ Robust methodology easy to replicate and adapt (C66, C144)                                               | ✗ Rotation of key public officials in Nuevo León and Chihuahua during the implementation process (C51, C66; IMCO, 2019f) |
| ✓ Integrated local civil society actors since the beginning of the project (C12; IMCO, 2018e)              | ✗ Lack of consolidated data nor procurement systems (C66, C144)                                                          |
| ✗ The information received required additional work to match and crosscheck the documents (C12, C92, C144) | ✗ Lack of human-technical capacity in public institutions to digitize documents – (C66, C144; IMCO, 2017b)               |

### *Lessons Learned*

One lesson learned is that it is possible to identify areas for improvement in procurement by analyzing just 130 data variables obtained from 10 documents with a transversal methodology suitable for any tender process, besides educational infrastructure in Mexican states (C12; IMCO, 2018a).

Another identified lesson is the necessity to sign cooperation agreements with high-level public officials to facilitate access to documents and data and participate actively. Even though this does not guarantee success, it improves the chances of reaching the activities' aims (IMCO, 2018; IMCO, 2018c). Including a local CSO counterpart as well as a public entity to implement and make accountable Mapping Corruption is a lesson learned for the next phase (C12).

A third lesson is that data still represents a challenge in Mexico; in this activity, most of the data was only available on paper and had to be digitized to process it. Even though digitized data can be a useful asset, neither government agencies nor CSOs have the installed capacity to make it happen in the short term (IMCO, 2017).

A fourth lesson is about the existence of a champion that can affect an activity positively or, when absent, negatively. One relevant positive example includes the former Head of the MPA of Chihuahua, who pushed forward the adoption and implementation of IMCO's Mapping Corruption intervention.

Finally, the pressure from local CSOs proved to be crucial for government agencies to open data when stonewalling occurs as in Nuevo León (C12, C51). It is essential to have a broad network of allies to distribute workloads such as scanning documents and other required field activities. It is worth considering a local champion to operate the Mapping Corruption platform, involving more CSOs in the process, and developing local capacities to reuse data both within and outside government.

### *Sustainability*

The activity was successful in achieving ownership in one of the two states of implementation. A medium level of institutionalization can be reported for the case of Chihuahua since the local Ministry of Public Administration is using lessons learned from Mapping Corruption and its methodology to develop the state's procurement system (C50, C144). It is likely that the system will be connected to the IMCO digital platform, but that is still in a design stage (C12, C51). Also, a member of the Council for Economic Development of the State of Chihuahua (CODECH) suggested that a local CSO should adopt the platform to ensure continuity despite changes in crucial government personnel (C92). In contrast, ownership was not achieved in Nuevo León. The activity faced severe difficulties trying to access the needed information when the local government changed from initially being cooperative to stonewalling. This shift is mainly attributed to the change of leadership at the Ministries of Public Administration and Education (C12, C51, C144).

In the end, Mapping Corruption presented mixed results regarding sustainability. On the one hand, in Chihuahua, there is a willingness of the Government to improve its procurement systems based on IMCO recommendations. CODECH is up to adopt the platform in the state (C144). On the other hand, in Nuevo León, there is no interest from GOM to support the efforts nor accept the recommendations to improve procurement processes (C51; IMCO, 2019g).

## **Conclusions**

IMCO and México Evalúa executed all of the planned activities and added activities to strengthen CSOs' capacities to promote the adoption of the information platform among them, widening the spectrum of users beyond to public institutions opening the possibility for social auditing processes.

A good practice to replicate in future activities is technical recommendations to improve procurement processes as an output planned. However, the continuity of the activity is pending resolution in Chihuahua, and in Nuevo León, the prospects are not promising. Another good practice was working with México Evalúa as a sub-grantee; this arrangement allowed the team to implement Mapping Corruption in two states at the same time, combined with the convening authority of these CSOs in those states. A third good practice was to incorporate local CSOs in the activity; the next step is to give them an active role after the planning phase to incorporate contexts insight and promote ownership.

An innovation detected in this activity was incorporating blockchain as an enabler for data traceability in their platform. It is recommended to keep this good practice in this and future activities. Through this activity, IMCO also innovated by figuring out 10 key documents to map all the public procurement process that seems easy to replicate in other states.

## ***Alliance for Integrity – Instituto Mexicano para la Competitividad***

### **Introduction**

The Alliance for Integrity is an ongoing activity that started in 2017 and ends in 2022. The Mexican Institute for Competitiveness (Instituto Mexicano para la Competitividad, IMCO) was tasked with working on different areas related to fighting corruption that are not usually covered in anti-corruption and transparency activities. Its geographic coverage is nationwide, through Federal institutions, for components 1 and 3, and the state of Coahuila for component 2, with an amount awarded of US\$1,575,000.

### **Background**

The Government of Mexico (GOM) has struggled to respond to the corruption and impunity crisis. Moreover, corruption is rarely restricted to the public sector, as private entities tend to be involved in these schemes as well. This is why the promotion of business integrity has been lauded as a key

intervention for a successful anti-corruption strategy, and a further reason why civil society must play a more active and critical role. The work done in past years by IMCO has precisely addressed these issues. Thus, weighing on IMCO's experience and capabilities, three shared strategic priorities were defined in collaboration with its business sector partners and USAID: (1) anti-corruption and integrity, (2) improving access to justice and rule of law, and (3) strengthening institutions to fight impunity and corruption (IMCO, 2017).

**Table 24. Alliance for Integrity Stakeholder Mapping**

| Name                                         | Role                                                                                            |
|----------------------------------------------|-------------------------------------------------------------------------------------------------|
| Office of the General Prosecutor of Coahuila | Primary counterpart – Provided access to state files on judicial processes                      |
| Office of the General Prosecutor of Jalisco  | Major counterpart – Was to provide access to state files on judicial processes, but backed down |
| Inter-American Academy of Human Rights       | Partnership – Assisted IMCO with supporting staff for the analysis of judicial files            |

### Description of the Activity

IMCO accepted the task of designing policy proposals that address corruption and access to justice, and to advocate for their consideration through outreach and dissemination. In conducting this work, IMCO will build on its existing alliances with governmental and non-governmental actors in order to boost prospects for implementation of its policy proposals (IMCO, 2017).

### Components and Objectives

1. Anti-corruption and integrity (Procurement Barometer, Model Business Integrity Policy, and Cross-Border Private Sector Bribery): Develop systems to detect corruption, and put together tools that allow citizens to be aware of these risks and, to the extent possible, prevent the occurrence of unethical behavior (IMCO, 2017).
2. Improving access to justice and the rule of law: Close the gap between the written law and what people actually experience when trying to access justice by generating useful data to understand why there are shortcomings and flaws in the investigations (IMCO, 2017).
3. Strengthening institutions to fight impunity and corruption: Propose for consideration an institutional design for the Special Prosecutor's office that would be grounded in an in-depth analysis of internal, institutional, and procedural needs for an anti-corruption prosecutor's office (IMCO, 2017).

### Theory of Change Evaluation

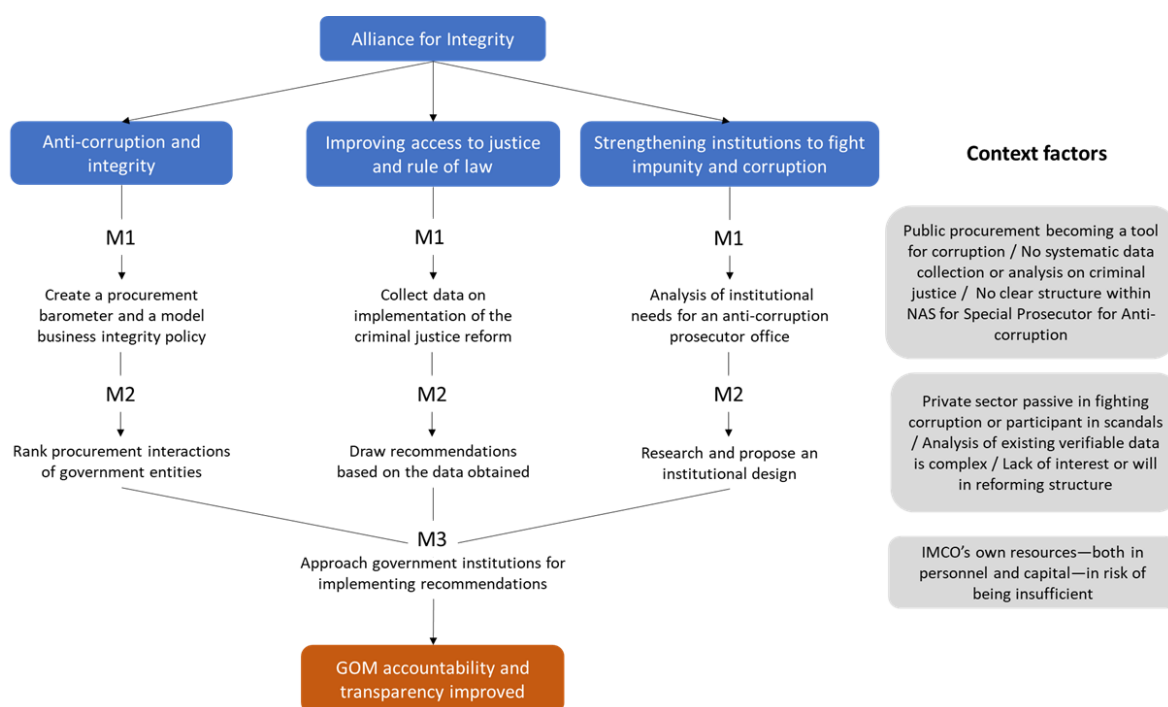
Each activity has its own theory of change:

- 1.1 If credible information about GOM entities' procurement integrity is disseminated, then that information will create incentives for the GOM entities to improve their procurement processes (IMCO, 2017).

- 1.2 If businesses are motivated to adapt integrity policies and ethical standards, then there will be fuller SNA compliance and strengthened overall private sector integrity (IMCO, 2017).
- 1.3. If IMCO develops and disseminates a model that incorporates strengthened enforcement of international and national policies and laws that foster integrity and the GOM adopts the model, then GOM stakeholders will be more likely to demonstrate needed commitment to pursuing international bribery cases (IMCO, 2017).
2. If new sets of primary data related to criminal justice reform were available, then that data would provide valuable insights to improve the human capacity, operational protocols, and policies that govern the justice system (IMCO, 2017).
3. If IMCO develops and disseminates clear plans for structuring anti-corruption prosecutors' offices, then federal and state GOM officials will be more likely to move forward by appointing prosecutors and provide them with the needed financial and human resources to carry out their duties (IMCO, 2017).

The evaluation team has articulated a Theory of Change analysis based on the documents and reports of the activities and from interviews. The identifiable central interventions are I: Intervention, M: Mechanism, and O: Outcome, which was taken from the activities' documentation, and the translation was made by the evaluation team. Context factors, which represent internal and external risks and appear on the sides, were developed by the evaluation team to analyze potential factors that could affect the Theory of Change.

**Figure 7. Theory of Change – Alliance for Integrity**



## Design Analysis

In general, this activity includes three ambitious and very different components. The risks posed by the context could represent important challenges when considering the national-level objectives established in the theories of change. Moreover, performance indicators, a proposed timeline or dates for completion, and clear strategies for outreach and dissemination are all absent from the official documentation. Thus, it is unclear how IMCO will attain many of its proposed goals, in particular concerning the mitigation of risks that context factors entail.

### *Anti-Corruption Approach*

The interventions of this activity attempt to tackle corruption from different angles. It is understood, as expressed by the first component, that corruption follows a set of incentives and risks that can be altered by means of promoting—and helping to build—more transparent processes in public procurement. These interventions also target networks that operate beyond formal outlets and are, therefore, more difficult to hold accountable. Its second component, though more focused on rule of law and access to justice, contributes to transparency by making judicial processes public and evidencing those areas where they tend to get stuck. In addition, the third component aims to promote a broader institutional change at the national level, recognizing that disseminating information can lead to reform, beyond the traditional top-down approach.

### *Alignment to USAID's Development Objective and Intermediate Results*

This activity contributes to improving GOM accountability and transparency with its first intervention, particularly by developing an electronic platform along with an established methodology for a better monitoring of public procurement processes (IRs 3.3.1.2 and 3.3.2.2), as well as to the collaboration of multi-actor coalitions (3.3.1.1) with its model business integrity policy. The second intervention, oriented to justice reform, is aligned with promoting greater transparency and accountability from public institutions (3.3). Its third intervention, regarding the proposal of an institutional framework for the Special Prosecutor's Office, aligns with promoting an increased professionalism and impartiality in GOM audit functions (3.3.2.3), though its scope goes further.

### *Alignment to USAID's Local Systems Framework (LSF)*

There is not a clear alignment to most of LSF characteristics. Out of the five planned activities, only the Model for Business Integrity seems to consider the participation of a small network of actors coming from different sectors. The rest of the activities consist mainly of office-based research to produce written reports or, at most, minor interactions with public institutions primarily with the purpose of data collection.

## Implementation Review

**Table 25. Alliance for Integrity Planned vs. Executed Activities**

| Planned Activities                                                                                                                                                     | Implemented | Ongoing | Changed | Comments                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|---------|---------|-----------------------------------------------------------------|
| 1. Creating a GOM Procurement Integrity Barometer                                                                                                                      |             |         | X       | Replaced with a Corruption Risk Index, work will resume in 2020 |
| 2. Developing a model business integrity policy                                                                                                                        |             | X       |         | Early stages                                                    |
| 3. Analyzing options for legal reforms to make punishment for cross-border private sector bribery more certain to be applied                                           |             | X       |         | Early stages                                                    |
| 4. Collecting data related to selected states' implementation of criminal justice reform and make related recommendations to improve capacity, practices, and policies |             | X       |         | Final stages                                                    |
| 5. Proposing a structure for the new federal and state Special Prosecutors for Anti-corruption                                                                         |             | X       | X       | Focused now on Mexico City, currently on hold                   |

IMCO has encountered several challenges through the first two years of the activity, as documented in their quarterly and annual reports. The most affected activity is the Procurement Integrity Barometer, which had to be abandoned after one year because of issues related to the original perception-based methodology that would have required a considerable amount of human and financial resources, making it not viable (IMCO, 2018d). Thus, IMCO chose to switch to evidence-based data, building upon an existing Corruption Risk Index that will be updated. As of November 2019, IMCO posted a call for proposals looking for a third party to perform the scrapping and analysis of public procurement data from January to May 2020.

Regarding its second intervention, the original work plan considered the state of Jalisco for evaluating the implementation of the local criminal justice reform. However, the state's new General Prosecutor (appointed in 2018) backed down from the commitments made by his predecessor, rendering the plan ineffective (C74, C142; IMCO, 2018b). IMCO was nevertheless able to overcome this challenge by establishing a collaborative agreement with the state of Coahuila, which provided the required data on time to allow the activity to resume. There is a general agreement that this is mostly due to the productive

relations that the team led by Ricardo Corona has built during the last years. In fact, according to different interviewees, Corona’s previous collaboration with the State Attorney of Coahuila was the reason why IMCO was able to rapidly overcome Jalisco leaving the activity (C30, C74, C114).

The third intervention has also suffered modifications. IMCO realized their current staff did not possess the necessary skills and level of specialization required for executing such activity, and that looking for a senior-level expert outside the organization was imperative (C12). According to team members (C12, C74), the modifications are more related to the activity’s implementation rather than its design, involving primarily a redistribution of tasks and resources. It was agreed that Dr. Ana Laura Magaloni—a senior researcher from the Centro de Investigación y Docencia Económicas (CIDE)—would join and lead this activity, along with supporting staff.

### *Benchmark*

There is no specific information on performance indicators or intermediate deliverables. Most of the activities are either on hold or in early stages.

## **Main Findings**

### *Results*

Because no intervention has been fully implemented, and given that there are no intermediate deliverables, there are no results attributable to the activity.

**Table 26. Alliance for Integrity Factors Affecting the Activity**

| Internal                                                                  | External                                                                              |
|---------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| ✓ IMCO’s ties and closeness with the private sector                       | ✓ Federal government pressing on private sector’s responsibility on corruption issues |
| ✓ Activities aligned with IMCO’s long-lasting corruption agenda           | ✗ New federal administration entered office two years into the activity               |
| ✗ IMCO’s leadership transition and USAID’s administrative changes         | ✗ Jalisco backed down from original working agreement                                 |
| ✗ Internal administrative changes and important turnover on key personnel |                                                                                       |
| ✗ No intermediate deliverables, complicating evaluation of progress       |                                                                                       |

In general, IMCO has focused its efforts in recent years on corruption-related issues, building solid expertise among its staff in this area. More specifically, and due to its relations with the private sector, it has usually approached corruption as a problem that goes beyond public institutions. However, IMCO has been experiencing important staff turnover at all levels, including the general and the anti-corruption directors. According to key informants (C12, C83, C107) this has been an important obstacle for the activity. Externally, the activity has benefited from the new federal administration’s focus on the

inclusion of the private sector when tackling corruption, but, at the same time, it was affected by the transition in the federal government happening a year into the activity.

### *Lessons Learned*

This activity has faced numerous challenges as it starts its third year of work. After two years of work, most interventions of the Alliance for Integrity are still in a very early stage due to different obstacles that have affected IMCO's efforts, with the exception of its second intervention. IMCO's quarterly reports show that the institution lacks the resources—both human and financial—to carry out a program of this size on its own, a condition reflected on the necessity of having to subcontract a third party or look for external collaborators to perform tasks in two of its three interventions (IMCO, 2019c). It is important as well to establish intermediate deliverables that allow for a better monitoring of the progress made at different stages—especially for a complex five-year activity. At the moment, no information on results was available.

### *Sustainability*

The activity is still ongoing, so it is not possible to offer conclusions on its future sustainability.

### **Conclusions**

IMCO has encountered multiple complications for executing two of the interventions contained in the activity—many of those related mostly to its high staff turnover rate and inadequate design of some activities—but, given that there are still three years left, there is time for solving the issues that have put its activities on hold and move forward. However, IMCO should include information regarding performance indicators on its quarterly and annual reports regardless of the activity's status because the available documentary evidence is heavily structured in a narrative way. This does not allow for an accurate analysis of its work to date—even for those components that have shown progress, as is the case of its justice and rule of law intervention.

### ***Program Contribution to the World Bank Global Partnership for Social Accountability Multi-Donor Trust Fund – World Bank***

#### **Introduction**

The core of the intervention was the implementation of open government initiatives with replicability, which if successful, would be promoted in different levels of Government of Mexico (GOM) institutions. The ultimate goal of its interventions is to improve the accountability and transparency of public institutions. Additionally, it seeks to strengthen their capacity to prevent, detect, and investigate conflicts of interest and illicit enrichment. The main focus was on the federal level, except for a participatory budget pilot in Cananea, Sonora. With an investment of US\$2.7 million, the activity started in September 2016 and is expected to finish in January 2020.

#### **Background**

Notwithstanding the implementation of legislation aiming to improve access to public information, such as the Federal Law of Transparency and Access to Public Information of 2002—reformed in 2014—most Mexicans believed by 2015 that their government was scarcely or not at all transparent. Along similar lines, Mexico performed poorly in the Corruption Perception Index (World Bank, 2018).

By 2014, Mexican civil society was carrying out significant efforts that led to the creation of the National Anti-corruption System (SNA) in 2016. In this context, the Ministry of Public Administration and the Implementing Partner agreed to address the effectiveness of the “Targeted Transparency” program,

promote citizen participation in government decisions, and strengthen the prevention of conflict of interests. However, the creation of the National Anti-corruption System (SNA) caused the transference of responsibilities from the Ministry of Public Administration to the Citizens' Participation Committee (CPC) and Executive Secretariat (SESNA). Also, the Organic Law of the Federal Public Administration expanded the duties of the Ministry of Public Administration in the development of policies related to open government, ethics, and integrity, among other objectives. In response to the new circumstances, the work between the Ministry of Public Administration and the Implementing Partner continued under the same principles, but adjusted to the new priorities of the Ministry: open government and public integrity. In February 2017, the GOM asked for such modifications, which USAID and the Implementing Partner consequently accepted. The implementation started under the newly approved conditions.

**Table 27. Program Contribution to the World Bank Global Partnership for Social Accountability Stakeholder Mapping**

| Program Contribution to the World Bank Global Partnership for Social Accountability Multi-Donor Trust Fund                                                   |                                                                                                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Counterparts                                                                                                                                                 |                                                                                                                                                                                    |
| Name                                                                                                                                                         | Role                                                                                                                                                                               |
| Secretaría de la Función Pública (Ministry of Public Administration, MPA)                                                                                    | Major counterpart leading all the activities of the activity.                                                                                                                      |
| Oficina de la Presidencia                                                                                                                                    | Important counterpart helping in the coordination of efforts in the design of the Open Contracting Data Standard platform.                                                         |
| Comité de Participación Ciudadana (Citizens' Participation Committee, CPC)                                                                                   | Counterpart in the Integrity Component. Strategic participation in the co-development of the financial disclosure template.                                                        |
| Secretaría Ejecutiva del Sistema Nacional Anticorrupción (Executive Secretariat of the National Anti-corruption System, SESNA)                               | Counterpart in the Integrity Component. Strategic participation in the co-development of the financial disclosure template and development of the National Anti-Corruption Policy. |
| Secretaría de Hacienda y Crédito Público (Ministry of Finance, SHCP)                                                                                         | Counterpart leading the work of the coalition (with MPA) of different stakeholders for the implementation of the pilots.                                                           |
| Instituto Nacional de Transparencia, Acceso a la Información (National Institute for Transparency, Access to information and Personal Data Protection, INAI) | Counterpart involved in the financial disclosure template activity. INAI determined the publicity of each field of the information requested in the template.                      |
| Secretaría de Desarrollo Agrario, Territorial y Urbano (Ministry of Agrarian,                                                                                | Major counterpart in the Participatory Budget pilot. This institution ensured the funds from the Mining Fund were                                                                  |

| Program Contribution to the World Bank Global Partnership for Social Accountability Multi-Donor Trust Fund |                                                                                                                                                                                                       |
|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Territorial, and Urban Development, SEDATU)                                                                | invested with a view to sustainable social, environmental, and human development.                                                                                                                     |
| Comité del Fondo Minero (Mining Fund Committee, CFM)                                                       | Coordinating authority for activities' approval to receive funds of the Mining Fund.                                                                                                                  |
| Cananea Municipality, Sonora                                                                               | Major counterpart in the Participatory Budget pilot. The municipality implemented the methodology designed for this pilot, based on public consultation for the execution of physical infrastructure. |

| Civil Society Organizations (CSOs)                                                                  |                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name                                                                                                | Role                                                                                                                                                                                                                                        |
| Transparencia Mexicana (TM)                                                                         | Major CSO participating in the activity. Provided advice on the design of the Open Contracting Data Standard platform and the Open Government Policy Paper; it was also strategically involved in the financial disclosure template design. |
| Centro de Investigación y Docencia Económicas (Center for Research and Teaching in Economics, CIDE) | Academic institution supporting the conflict of interest baseline activity.                                                                                                                                                                 |
| Fundar                                                                                              | CSO. Limited consultation in the Open Government Policy Paper activity.                                                                                                                                                                     |
| Red por la Rendición de Cuentas (Network for Accountability, RRC)                                   | CSO. Limited consultation in the Open Government Policy Paper activity. This CSO also received support in the organization of a Forum on money laundering held in October 2018.                                                             |
| Social TIC                                                                                          | CSO. Limited consultation in the Open Government Policy Paper activity.                                                                                                                                                                     |
| Social Management and Cooperation (Gestión Social y Cooperación, GESOC)                             | CSO. Limited consultation in the Open Government Policy Paper activity.                                                                                                                                                                     |

## Description of the Activity

By 2015 the GOM had requested the support of the World Bank in strengthening its integrity system. The World Bank agreed to provide this assistance and channeled it through the “Mexico Transparency and Accountability” Trust Fund financed by USAID and provided by the Bank’s Global Partnership for Social Accountability (GPSA). It comprises a three-year effort (from January 2017 to January 2020) that aims to contribute to three key anti-corruption areas: transparency, ethics and integrity, and citizen participation.

Shortly after the beginning of the intervention, some changes and context circumstances affected GPSA implementation—for instance, the introduction of important reforms in the anti-corruption and integrity legal framework such as the entry into force of the SNA, changes in the structure and personnel of the counterparts, changes related to the transfer of competencies from the Ministry of Public Administration to the CPC, and, finally, Mexico’s adoption of international commitments regarding open government initiatives. As a result, in early 2017, the GOM, USAID, and the World Bank agreed upon some adjustments, and launched the activity under the terms of the new agreement (World Bank, 2018).

After these modifications, GPSA comprised two main interventions: Open Government, which includes three pilots and reports, and Public Integrity, which establishes a baseline for conflict of interest and recommendations to prevent this phenomenon, strengthens the Financial Disclosure System, and makes provision for technical assistance on whistleblower protection.

## Objectives and Components

In this sense, the development objective changed from:

*“To improve the design and effectiveness of key government policies: targeted transparency, ethics and public integrity, and citizen participation.”*

To:

*“To improve the design, effectiveness, and implementation of open government initiatives and public integrity and anti-corruption policies and tools.”*

The most important adjustment was the inclusion of open government and anti-corruption policies and tools. The new objective statement keeps “Public integrity” from the original version; it omits “citizen participation” but preserves the principle of citizen participation in the development of the activity.

Specific objectives were phrased as follows (World Bank, 2018):

*Improved and strengthened policy on Targeted Transparency throughout the Federal Public Administration that generates relevant and socially useful information for the citizens.*

*Enhanced citizen-participation model to ensure that the voice of the society is effectively incorporated to improve government actions, including preventing corruption and conflict of interest in key public acts.*

*Strengthened institutional capacity to promote ethics and prevent conflict of interest in the public federal administration.*

These specific objectives became interventions under the revised activities. In practical terms, these changes reduced the number of activities; the objectives focused on those activities considered critical by the major counterpart, the Ministry of Public Administration.

### *Component 1. Open Government*

This component focused on the implementation of three pilots: (a) Implementation of the Open Contracting Data Standard (OCDS), (b) Review of the Social Accountability process through the lens of open government, and (c) New Social Participation Mechanisms: Participatory Budgeting in the Mining Fund. The Open Government component would be implemented mainly at the Federal level except for the pilot c, which was carried out at a municipality where mining is a very significant activity (World Bank, 2018).

### *Component 2. Public Integrity*

This component encompassed conflict of interest with several planned activities that can be summarized as follows: (a) establishing conflict of interest baseline, (b) strengthening the Financial Disclosure System for public employees, (c) increasing capacities to prevent and detect conflict of interest, including the co-development of the financial disclosure template, (d) peer review of the National Anti-Corruption Policy, and (e) providing whistleblower protection technical assistance. Original and revised components and activities can be checked in Table 28. This component would be implemented mainly at the Federal level (World Bank, 2018).

**Table 28. Program Contribution to the World Bank Global Partnership for Social Accountability – Original Components and Activities vs. Revised Components and Activities**

| Original Component                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Revised Component             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Component Name                           | Activities                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Component Name                | Activities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Component 1: Targeted Transparency       | <ul style="list-style-type: none"> <li>*Evaluate the effectiveness of the Targeted Transparency policy</li> <li>*Develop recommendations to strengthen the target transparency policy of the federal government, including a proposal of the implementation plan and guidelines (dropped).</li> <li>*Design and implement three pilots (revised)</li> </ul>                                                                                                                | Component 1: Open Government  | <ul style="list-style-type: none"> <li>*Write Open Government policy paper for the Federal Public Administration.</li> <li>*Run diagnostic of the user-centered Participa Platform.</li> <li>*Pilot 1: Implement the Open Contracting Data Standard (OCDS).</li> <li>* Pilot 2: Review the Social Accountability process through the lens of open government.</li> <li>* Pilot 3: New Social Participation Mechanisms: Participatory Budgeting in the Mining Fund.</li> </ul>                                                                                                                                                                                                                                                                                                          |
| Component 2: Integrity and Public Ethics | <ul style="list-style-type: none"> <li>* Strengthen actions against conflict of interest</li> <li>* Use Big Data to manage Conflict of Interest (revised)</li> <li>* Design training tools for GOM personnel on ethics rules and best practices (dropped).</li> <li>* Propose an integrated policy for preventing, Detecting, and mitigating conflicts of interest (revised).</li> <li>* Collaborate with private sector to promote shared ethics and integrity</li> </ul> | Component 2: Public Integrity | <ul style="list-style-type: none"> <li>* Diagnose conflict of interest and financial disclosure systems.</li> <li>* Co-develop the national financial disclosure format.</li> <li>* Develop a toolkit to guide GOM implementation of the policy for managing conflict of interest in each stage of the cycle (dropped).</li> <li>* Identify proven methods for analyzing “big data” to manage ethics risks in public administration and counter corruption.</li> <li>* Train the Ministry of Public Administration and the Technical Secretariat of the SNA personnel on the use and application of data analytics tools.</li> <li>* Develop a data-driven conceptual model for an Integrated Conflict of Interest and Procurement Integrity Risk-based Information System.</li> </ul> |

| Original Component                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Revised Component       |                                                                                                                                                                                                                                                                                                       |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Component Name                     | Activities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Component Name          | Activities                                                                                                                                                                                                                                                                                            |
|                                    | values (dropped)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                         | <ul style="list-style-type: none"> <li>* Conduct Conflict of Interest Baseline and Policy recommendation to manage conflict of interest.</li> <li>* Conduct Peer review of the National Anti-corruption Policy.</li> <li>* Provide whistleblower protection technical assistance (ad hoc).</li> </ul> |
| Component 3: Citizen Participation | <ul style="list-style-type: none"> <li>* Increase the Citizen Participation Program's effectiveness and implementation (see Component 1)</li> <li>* Develop a citizen-centric electronic model for key public services and institutions that create a single citizen window to interact with government in different processes: feedback, evaluate or complain about the delivery of a service, and public service requests (dropped).</li> <li>* Develop a training curriculum for federal employees to promote citizen outreach and participation in public processes (dropped).</li> <li>* Develop a training curriculum for citizens and civil society representatives regarding their role in preventing</li> </ul> | Merged with Component 1 |                                                                                                                                                                                                                                                                                                       |

| Original Component |                                                                                                                                                                                                                             | Revised Component |            |
|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------|
| Component Name     | Activities                                                                                                                                                                                                                  | Component Name    | Activities |
|                    | <p>corruption and improving public management (dropped).</p> <p>* Design a proposal for a knowledge-based platform to house and manage this information, and track course completion within federal entities (dropped).</p> |                   |            |

Even though the activities were performed by a common counterpart, the Ministry of Public Administration, the actions were executed within different administrative units of the Ministry and do not appear to linkages or coordination among them.

## Theory of Change Evaluation

The documentation provided did not include a theory of change. The evaluation team has articulated one for each of the activity's components, based on the referred documentation and from interviews. These are included below:

For the Open Government component:

*“The open government initiatives, when successful, will strengthen the capacities for promoting transparency and accountability practices in the participant public institutions.”*

For the Public Integrity component:

*“Implementing policies and tools addressing conflict of interest and illicit enrichment will enhance the capacities of GOM institutions to prevent, detect, and investigate these problems.”*

## Theory of Change Analysis

The main components are I: Intervention, M: Mechanism, and O: Outcome, which the evaluation team took from GPSA's documentation. The team also developed contextual factors, which represent internal and external risks and appear on the sides, to analyze potential factors that could affect the Theory of Change.

**Figure 8. Theory of Change – Open Government Component**  
**Theory of Change - World Bank - Open Government Component**

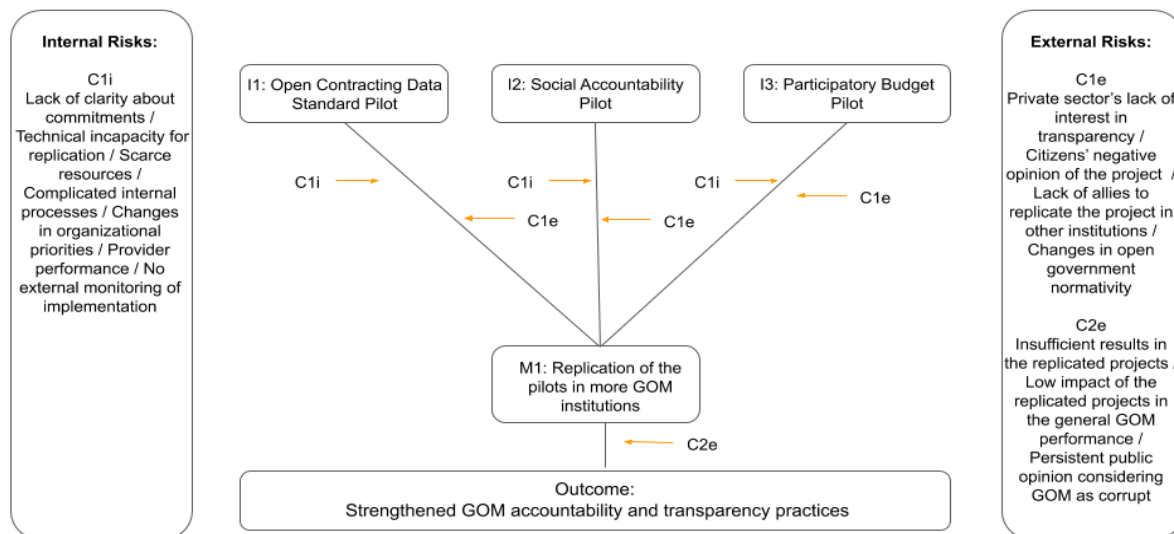
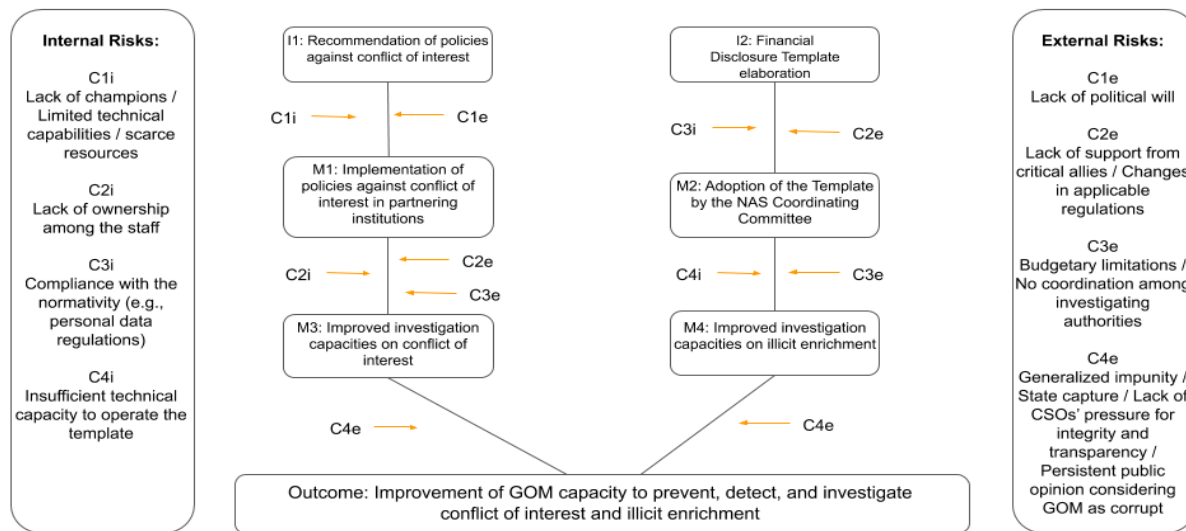


**Figure 9. Theory of Change – Public Integrity Component**  
**Theory of Change - World Bank - Public Integrity Component**



The following are the main factors affecting this Theory of Change:

- Lack of clarity about commitments
- Changes in organizational priorities
- Lack of champions
- Lack of staff ownership
- Generalized impunity
- Persistent public opinion considering GOM as corrupt, despite efforts for transparency and accountability

## Design analysis

### *Anti-corruption approach*

Two anti-corruption approaches are used, one for each of the components.

**Component 1:** In enhancing the accountability and transparency of GOM institutions through open government initiatives, GPSA has some elements of the corruption-human rights approach—for example, aiming to reduce favoritism shown from public officials to citizens when these last ones interact with public entities. Examples of this approach are, in the case of the participatory budget, the right to participate in one's government and the right to access information relating to procurement data in the open contracting pilot.

**Component 2:** The Public Integrity component focuses on increasing risks for public officials who might otherwise be willing to engage in corrupt acts (when asked to present their financial information) or become involved in conflicts of interest, both regulated by the Administrative Responsibilities Act. The

use of formal institutions to address corrupt acts and conflicts of interest reveals an economic approach to corruption.

#### *Alignment to USAID's Development Objective and Intermediate Results*

The activities' components are designed to contribute to the Development Objective 3, *Enabling environment to protect human rights and prevent abuses improved*, by strengthening transparency and accountability via policy recommendations and pilot programs related to public procurement. The Public Integrity component guides the evidence-based implementation of policies that aim to reduce conflicts of interest. With one exception, this program is in line with all the elements of the following Sub-IRs: 3.3.1 Non-governmental actors' capacity to advocate and demand implementation of anti-corruption reforms enhanced, and 3.3.2 GOM technical capacity to implement legal and policy frameworks for accountability and transparency improved; the exception is the development of media capacity to investigate (3.3.1.3).

#### *Alignment to USAID's Local Systems Framework*

The activity involves several actors, and many of them take part in more than one component. The intervention embraces local knowledge, from both CSOs and public entities. GPSA aims to address a wide range of issues that are relevant to fighting corruption, such as transparency and accountability. However, because of the limited role of external actors apart from the Ministry of Public Administration, it cannot be said that the activity created an enabling environment under the Local Systems Framework (LSF). In general terms, the design is mostly aligned with the LSF, with the exception that the convening authority seems more focused on the World Bank than on USAID.

#### *Local Systems Framework 5Rs*

- **Results:** This local system approach focuses on strengthening GOM accountability and transparency from different angles. **Component 1** is centered on the design and implementation of open government tools at different levels and institutions of the federal government. **Component 2** concentrates on the improvement of GOM capacities to fight against conflicts of interest and illicit enrichment through evidence-based technical assistance to key public institutions related to the topic.
- **Roles: Component 1:** (1) Ministry of Public Administration is the core institution leading the implementation agenda of the open government component. (2) The World Bank is the implementing partner with the know-how for both components, proposing tools and evidence for the improvement of the implementation. (3) SHCP plays an important role in the pilot programs (mainly in the co-design of the open contracting platform and Participatory Budget). Also, SHCP is crucial because it is the institution that approves international support to GOM entities. (4) INAI participates in the co-design of the open contracting platform. (5) The Office of the Presidency of Mexico helps in the coordination of efforts in the Open Contracting pilot. (6) SEDATU was involved in the Participatory Budget Pilot, ensuring the funds from the Mining Fund were invested with a view to sustainable social, environmental, and human development. (7) The Mining Fund Committee participated as a coordinating authority of different actors and approved the resources for the activities. (8) Cananea Municipality in Sonora was involved as the major counterpart in the Participatory Budget Pilot. (9) Transparencia Mexicana provided advice in the implementation of the Open Contracting Data Standard Pilot. (10) Other CSOs such as Fundar, Red por la Rendición de Cuentas, Social TIC, and GESOC had a limited participation in the consultations on open government policies. (11) Red por la Rendición de Cuentas received support to organize a forum on money-laundering held in October 2018.

**Component 2:** (1) Ministry of Public Administration is the core institution in the execution of the public integrity component. (2) The World Bank is the implementing partner with the know-how for both components, proposing tools and evidence to decision-makers. (3) SHCP is the institution that approves international support to GOM entities. (4) CPC was the requesting institution receiving assistance in the public integrity component (mainly for drafting the financial disclosure formats). (4) SESNA was the requesting institution receiving assistance in the public integrity component (mainly for drafting of the National Anti-Corruption Policy and in ongoing recommendations on whistleblower protection). (5) INAI was involved in the co-development of the financial disclosure format, suggesting which information fields should be publicly accessible. (6) Transparencia Mexicana provided strategic support in the financial disclosure template design. (7) CIDE conducted the diagnosis for establishing the conflict of interest baseline.

- **Relationships:** Most relationships are formal. (1) The World Bank relates to all other actors involved in this program. (2) Different areas of the Ministry of Public Administration engage with most of the participants; there is no clear evidence of relationships with CSOs other than Transparencia Mexicana. (3) The Office of the Presidency of Mexico mostly relates to the Ministry of Public Administration and the World Bank, helping in the coordination efforts. (4) CPC, SESNA, and INAI connect with the Ministry of Public Administration, the World Bank, SHCP, and Transparencia Mexicana in their respective roles. (5) SEDATU, the Mining Fund Committee, and the Cananea Municipality link each other with the World Bank and SHCP. (6) CIDE has a connection with the World Bank and SESNA. (7) Other CSOs relate to each other and to the World Bank.
- **Rules:** Formal rules, such as the SNA regulations, are relevant for the activity. The actors involved cannot modify the laws because Congress enacts them. However, some of the counterparts engaged (SESNA, SHCP, CPC, INAI) can influence or generate policies on fighting corruption, transparency, and accountability, depending on their legal mandate. No informal rules were detected.
- **Resources:** These include the budget provided by the donor (USAID); expertise and know-how on open government, conflict of interest, and illicit enrichment (World Bank and Transparencia Mexicana); know-how on the use of personal data (INAI); convening authority (Office of the Presidency of Mexico and World Bank); strategic attributes on influencing or generation of policies (Ministry of Public Administration, SESNA, CPC, INAI, SHCP); and legal attributes on the Mining Fund (SEDATU, SHCP, Mining Fund Committee, Cananea Municipality).

## Implementation Review

Due to outdated and insufficient reporting, and in light of the understanding of GPSA's progress, the implementation analysis is based on the only progress report available and the interviews of key informants. There were significant modifications to the activities in February 2017. For the sake of simplification, the evaluation of the difference between planned and implemented activities will examine the revised version of the components. Otherwise, most of the content of the next section will focus on describing the merged or dropped components. To compare the original and revised activities, refer to Table of Objectives and Components Section. Most of the main activities are complete, and a few specific actions are under development. Only one has been dropped.

Two elements are essential to understand the results obtained by this program. One, as confidentially reported by a key informant (C83), refers to the unwillingness of some actors to work with each other. In the beginning, this happened between different actors of the federal government and members of the SNA. However, a change in relations took place, since those actors ended up collaborating. The

convening authority of USAID through the World Bank was relevant in influencing the shift in the attitude of these parties.

Second, public officials engaged in both components have a favorable opinion of the World Bank's expertise (C14, C18, C35, C79, C171). This capacity-building initially performed through workshops "opened the minds of many people" on conflict of interest (C79). Also, "public officials [have begun] to understand the procurement process as a longer cycle, from planning to the execution of the contract" (C11). It also provided critical technical support that was necessary for the success of the participatory budgeting pilot (C35).

### *Component 1. Open Government*

Most of the component's activities are complete, except for the Social Accountability Process, which is on hold. Pilot 1, officially called "Implementation of the Open Contracting Data Standard (OCDS)," has been adopted by Mexican authorities. The World Bank adapted the standard for the Mexican context and was branded as "EDCA MX." This standard was used in the procurement processes of the New International Airport of the City of Mexico. The federal government has adopted its architecture and used it in the website Contrataciones Abiertas, launched in November 2017, which was active until December 2018 (C11, C83). This website has recently been relaunched. According to a high-ranking official at the MPA (C11), the platform merges the data from the MPA and SHCP that encompasses the entire process of public procurement: planning, resource allocation, tender bidding, contract-awarding, signing of the contract, and disbursements. The EDCA MX will be used by the National Digital Platform of the SNA, specifically, for the System 6 or "Sistema de Información Pública de Contrataciones" (Public System for Procurement Information). Even more, some subnational governments have adopted the new national standard. Examples of this adoption at the regional level are Chihuahua, Jalisco, Mexico City, and Sonora (C11, C48; Government of Chihuahua, 2019; Government of Jalisco, 2019; Government of Mexico City, 2019).

Pilot 2, "Review of the Social Accountability process through the lens of open government," is on hold (C83, C156). According to the key informants (C72, C83), the agreement on this pilot was to deliver to the Ministry of Public Administration a diagnostic and an IT tool called Social Accountability Computer System (SICS) 3.0. Informants reported that this activity included a pilot with selected social programs, such as the Program of Prevention of Violence against Women (Paines in Spanish), Social Inclusion Program (Prospera in Spanish), and Drinking Water, Drainage, and Treatment Program (Proagua in Spanish) (C72). This pilot revealed areas of opportunity related from the users' perspective and interoperability, which were identified and addressed by the World Bank (C72). Only a final stage of data migration was pending by the end of the previous national administration (C11, C72). Despite delivering SICS 3.0 and its documentation to the new administration, it has not been used (C91, C131, C150, C156). However, the MPA is assessing which elements of this Social Accountability process will be included in the new platform, which is expected to be ready by the end of 2019.

The third pilot is known as "New Social Participation Mechanisms: Participatory Budgeting in the Mining Fund"<sup>23</sup> or Participatory Budget Pilot. The objective was to apply a methodology in the municipality of Cananea, Sonora, to allocate the resources of the Mining Fund. This methodology included the following activities: 14 participatory meetings with 615 participants, who proposed 377 activities to be executed. After technical analysis, only 34 of the proposed activities were approved, and 31 of them advanced to the next phase (World Bank 2018). Citizens voted (two votes per person) for their preferred activities between September and October 2017 (21 percent of the voting population). Activities

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<sup>23</sup> The Mining Fund consists of a percentage of the revenue collected from mining companies and aims to benefit localities where extractive activities take place through providing financial support, in tandem with local governments, to infrastructure and social activities.

were prepared and reviewed by the Mining Fund Committee. As a result, the municipality completed 11 activities, with the other two that are in their final stages, for a total investment of around 42 million pesos (C35, C121; World Bank 2018). Additionally, this pilot included the design of a website with information relating to the Participatory Budget process. Despite the successful implementation, the new local administration decided not to implement the methodology in subsequent years.

Two components were not delivered: the Open Government Policy Paper scheduled to be delivered in May 2017 and a Diagnostic and recommendations for the Participa Platform scheduled to be delivered in July 2017. In the first case, external events such as the decision of civil society representatives to leave the multi-stakeholder forum of the Open Government Partnership process in Mexico—due to a scandal relating to government espionage on CSOs, journalists, and academics—affected the continuity of the activity (World Bank, 2018). In the second, the main cause was the change in the leadership of the Ministry of Public Administration in 2017 (C83).

### *Component 2. Public Integrity*

This component included a wide range of activities. However, they can be grouped into three strategies: one focuses on capacity-building interventions for GOM entities to deal with conflict of interest, the second concentrates on drafting the financial disclosure template (which mainly addresses illicit enrichment), and the final one refers to supporting the design of the National Anti-Corruption Policy. One key sub-activity that allowed the World Bank to implement other actions was the “International Workshop on Experiences in Data Analytics and Financial Disclosure Administration to Promote Public Integrity,” which took place in May 2017. According to the interviewee C171, the workshop targeted public officials of internal control and audit units, but CSOs also were in attendance.

The World Bank conducted several capacity-building activities, such as the Diagnostic of Conflict of Interest and Financial Disclosure Systems. This capacity-building objective was achieved through (a) a diagnostic of the legal framework, practices, and tools on these two topics; (b) the above-mentioned international workshop; (c) a study trip to Romania with members of SESNA, CPC, and the Ministry of Public Administration; (d) a workshop on money-laundering; and (e) the participation of members of SESNA in an anti-corruption forum in Denmark (C18, C79, C83). Furthermore, the Bank produced recommendations to the Ministry of Public Administration on whistleblower protection. Additional capacity-building activities are ongoing, with two studies addressing the design of data and risk analysis to fight corruption and collusion, and the baseline study on conflict of interest based on data from a survey with three thousand respondents. Finally, there is a proposal to use remnants to provide training to the Superior Audit Institution of the Federation (ASF) personnel on artificial intelligence and use of data to detect situations of conflict of interest.

Activities to develop the national financial disclosure template included several workshops on international experiences. The main stakeholders participating in the process were the Ministry of Public Administration (e.g. Ethics’ Unit staff); the SNA Citizens Participation Committee (CPC); the National Institute of Transparency, Access to Information, and Protection of Personal Data (INAI); and CSOs (e.g., Transparencia Mexicana) (C14, C79, C83, C171; World Bank, 2018).

After several weeks of work, the CPC delivered a draft of the financial disclosure format to the SNA Coordinating Committee by May 2018. Further discussions of its content with different actors such as Ministry of Public Administration, CPC, and INAI followed. The final formats were published in the Official Gazette of the Federation (DOF) by November 2018. However, after the start of the new national administration, there was a new round of revisions of the format. The World Bank enabled a collaborative work between different actors on the financial disclosure template. However, the final version did not incorporate the elements derived from the World Bank technical assistance, as it only considered minor additions to the formats that were in use before the activity started, collecting little additional data (C14,

C83, C137; Official Gazette of the Federation, 2019). The revised format was published in the DOF in September 2019.

The third strategy of the Public Integrity component is supporting the drafting of the National Anti-corruption Policy. The SESNA worked on a proposal that considered the views of different stakeholders through an online consultation, regional forums, and feedback from experts. This proposal had a peer review by 10 experts convened by the World Bank in Washington at the beginning of 2019. This review produced several recommendations. From these, suggestions on the definition of the National Anti-corruption Policy main strategies and on simplifying the content of the document (language and communication tools) can be highlighted (C18). SESNA was expecting more support in the Anti-corruption Policy from the World Bank, but it was not possible. According to C18, one of the reasons was that all the support from international agencies to GOM entities needs the approval of the Ministry of Finance, which can take months.

According to an informant (C83), the implementing partner and the Ministry of Public Administration agreed to cancel the activity “develop a toolkit to guide GOM implementation of the policy for managing conflict of interest in each stage of the cycle.” However, the informant did not explain the reason for such a decision.

**Table 29. Program Contribution to the World Bank Global Partnership for Social Accountability – Planned vs. Implemented Activities**

| <b>Component 1. Open Government</b>                                                      |                  |                |                |                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------------------------------------------------------------------------|------------------|----------------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Planned Activities</b>                                                                | <b>Completed</b> | <b>Ongoing</b> | <b>Dropped</b> | <b>Comments</b>                                                                                                                                                                                                                                                                                                                                                                                                 |
| Open government policy paper for the Federal Public Administration                       | X                |                |                | Open Government Policy Paper (May 10, 2017).                                                                                                                                                                                                                                                                                                                                                                    |
| Diagnostic and recommendations for the Participa Platform                                | X                |                |                | Diagnostic Report (July 27, 2017).                                                                                                                                                                                                                                                                                                                                                                              |
| Pilot 1: Implementation of the Open Contracting Data Standard (OCDS)                     | X                |                |                | <p>OCDS adapted version officially launched on Nov 2017.</p> <p>Co-design (Presidencia, Ministry of Public Administration, SHCP, INAI, and Transparencia Mexicana) process included a series of working sessions and workshops to tailor OCDS, pilot it, and disseminate the standard. The process was led by the World Bank. The Open Contracting Partnership (OCP) provided additional technical support.</p> |
| Pilot 2: Review of the Social Accountability process through the lens of open government | X                |                |                | <p>Diagnostic of the social accountability mechanism from an open government approach (August 10, 2017).</p> <p>A prototype version of the new IT platform “Social Accountability Computer System 3.0” (SICS 3.0). The platform was developed by October 31, 2018 (finished and presented).</p>                                                                                                                 |

| Component 1. Open Government                                                                                                                                                                                                                            |           |         |         |                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Planned Activities                                                                                                                                                                                                                                      | Completed | Ongoing | Dropped | Comments                                                                                                                                                                                                                                                                                                                                                                                       |
|                                                                                                                                                                                                                                                         |           |         |         | <p>A pilot phase was developed to test the functionality of all profiles covered by the new platform (March 2018 to September 2018, Delivered).</p> <p>The tool and its documentation were presented to the new administration.</p>                                                                                                                                                            |
| Pilot 3: New Social Participation Mechanisms: Participatory Budgeting in the Mining Fund                                                                                                                                                                | X         |         |         | <p>Cananea Participatory Budgeting Methodology (March 27, 2018).<br/>Cananea Participatory Budgeting Portal (March 27, 2018).</p>                                                                                                                                                                                                                                                              |
| Component 2 – Public Integrity                                                                                                                                                                                                                          |           |         |         |                                                                                                                                                                                                                                                                                                                                                                                                |
| Planned Activities                                                                                                                                                                                                                                      | Completed | Ongoing | Dropped | Comments                                                                                                                                                                                                                                                                                                                                                                                       |
| Diagnostic of conflict of interest and financial disclosure systems, and review of solid international experiences on the identification and prevention of conflict of interest that inform MPA and SNA on the reforms needed given their new mandates. | X         |         |         | <p>Diagnostic of the legal framework, practices, and tools carried out from November 2016 to April 2017.</p> <p>International Workshop on Experiences in Data Analytics and Financial Disclosure Administration to Promote Public Integrity (May 2017).</p> <p>Study trip to Romania was carried out in June 2017.</p> <p>Co-organization of the seventh international forum of Red por la</p> |

| Component 1. Open Government                           |           |         |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------|-----------|---------|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Planned Activities                                     | Completed | Ongoing | Dropped | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                        |           |         |         | <p>Rendición de Cuentas, October 2–3, 2018. WB brought in a specialist on money-laundering and financed the other two specialists.</p> <p>International Corruption Hunters Alliance Forum. Conference in Denmark attended by SESNA and included the participation in a panel of INAI (October 2018).</p>                                                                                                                                                                                                                                                                                                  |
| Co-develop the national financial disclosure template. | X         |         |         | <p>Co-design of the Financial Disclosure Form (May 29, 2018). The form was published in the DOF in September 2018.</p> <p>Co-design of the financial disclosure form included the following activities:</p> <p>Local introductory workshops with key counterparts in the Ministry of Public Administration (UEIPPCI), General Direction of Responsibilities (Declaranet), Directions for Asset Analysis Development, and CPC on international trends and practices for financial disclosure (November 2016– April 2017).</p> <p>International Workshop on Experiences in Data Analytics and Financial</p> |

| Component 1. Open Government                                                                                              |           |         |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------|-----------|---------|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Planned Activities                                                                                                        | Completed | Ongoing | Dropped | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                                                           |           |         |         | <p>Disclosure Administration to Promote Public Integrity (May 2017).</p> <p>Workshop with key actors of the SNA to develop the first draft of the financial disclosure template (June 27–29, 2017).</p> <p>Various workshops with the Ministry of Public Administration and CSOs to review and further develop the financial disclosure template and implementation guidelines (July 2017–May 2018).</p> <p>Review of the second version of the financial disclosure form produced by the SNA (June 2019). The second version was published in the DOF on September 2019.</p> |
| Develop a toolkit to guide GOM implementation of the policy for managing conflict of interest in each stage of the cycle. |           |         | X       | Dropped.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Identify proven methods for analyzing “big data” to manage ethics risks in public administration and counter corruption.  |           | X       |         | International Workshop on Experiences in Data Analytics and Financial Disclosure Administration to Promote Public Integrity (May 2017).                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Train MPA and the Technical Secretariat of the SNA personnel on the use                                                   |           | X       |         | International Workshop on Experiences in Data Analytics and Financial Disclosure Administration                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

| Component 1. Open Government                                                                                                           |           |         |         |                                                                                                                                                                                                                                                                                               |
|----------------------------------------------------------------------------------------------------------------------------------------|-----------|---------|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Planned Activities                                                                                                                     | Completed | Ongoing | Dropped | Comments                                                                                                                                                                                                                                                                                      |
| and application of data analytics tools.                                                                                               |           |         |         | to Promote Public Integrity (May 2017).                                                                                                                                                                                                                                                       |
| Develop a data-driven conceptual model for an Integrated Conflict of Interest and Procurement Integrity Risk-based Information System. |           | X       |         | Two studies addressing the design of data and risk management. One on corruption and another on collusion. These activities are ongoing. Delivery date to be defined. These deliverables aim to help Mexico to advance in building an AI tool to address corruption and conflict of interest. |
| Recommend Conflict of Interest Baseline and Policy to manage conflict of interest.                                                     |           | X       |         | By August 2019, the survey results (3,000 participants) have been analyzed to provide recommendations to the Federal Public Administration (APF) regarding conflict of interests.<br><br>Reports based on that baseline are in the development process                                        |
| Conduct peer review of the National Anti-corruption Policy.                                                                            | X         |         |         | (January 2019). Event with 10 experts in Washington. They provided feedback about the NAP already developed by the SESNA.<br><br>The World Bank was part of the technical committee for the design of the NAP.                                                                                |
| Provide whistleblower protection technical assistance (ad hoc).                                                                        | X         |         |         | Recommendations Report (July 14, 2017).                                                                                                                                                                                                                                                       |

According to the World Bank staff, the definition of tasks for the last year of the implementation is pending. There is a proposal to use remaining resources in technical assistance to ASF, regarding artificial intelligence and use of data on conflict of interest.

## **Main findings**

### *Results*

#### *Most Significant Change – Open Government Component*

The adoption of the EDCA MX is considered effective and has become a model to develop the National Digital Platform (Official Gazette of the Federation, 2019). Also, there are open contracting platforms, based on EDCA MX, at the regional level in Mexico City, Jalisco, Sonora, and Chihuahua (C11, C48; Government of Chihuahua, 2019; Government of Jalisco, 2019; Government of Mexico City, 2019). A high-ranking official at the MPA (C11) considers the adoption of the EDCA MX at the federal and subnational levels as one of the most significant changes because it covers the entire public procurement process: planning, resource-allocation, bidding, contract award, contract signing, and payments.

The EDCA MX was tailored to the needs and priorities of the country. In essence, stakeholders were pushing in that direction, and it had champions, particularly at the MPA and Ministry of Finance, to move forward the intervention. Having a third party with the technical know-how also encouraged CSOs collaboration, in this case, from Transparencia Mexicana (C79, C171). Public officials, engaged in all World Bank's components, also valued its technical expertise (C14, C18, C35, C79, C171).

The Participatory Budgeting Mechanism in the World Bank's Mining Fund pilot also achieved its targets, with a higher than expected participation rate (21 percent vs. 10 percent of the total voting population), and with most of the infrastructure selected in the participatory budget already completed (C35, C121; World Bank, 2018): 14 participatory meetings were conducted with 615 participants; 377 projects were proposed and analyzed to execute 11 projects with an investment of MXN \$42 million. The intervention was encouraged by champions, particularly at the Ministry of Economy, and the technical expertise of the World Bank. Final beneficiaries identified as the most significant change that inhabitants are more willing to participate in a new round of participatory budgeting if it were to happen (C52, C101, C116).

In addition, regarding relationships, because each citizen was allowed to vote twice (one vote for personal choice and another for the common interest) different dynamics of collaboration arose between neighbors. There were agreements between groups of citizens in nearby streets to support each other's proposals when voting (C116). These alliances were encouraged by common sense, as a person living on a certain street will benefit if the surrounding roads are paved (C35). After "Cananea tu decides," interviewed inhabitants of this small town, it seems people are not just more willing to participate, but they also feel that there is an enhanced trust in government institutions (C52, C101, C116). The evaluation team interprets this willingness as local ownership. In two different locations in Cananea, key informants (C52, C101, C116) highlighted that they had been waiting for pavement for 23 and 30 years, respectively. Until this infrastructure was built, they had just dirt roads (C101, C116). This pilot goal was to test the efficacy of the methodology, which the implementing partner achieved. USAID can retake the initiative in other municipalities with this proven methodology. As explained by an informant (C38), in North America, there are 170 experiences of participatory budget, but in Mexico, the number is just 18.

From "Cananea tu decides" one story stands out. Don Mauro, a motivated citizen, determined to get street lighting for the Las Huertas community where his granddaughter lives. The problem was that other communities were more likely to receive infrastructure for public services. Don Mauro's community was asking for lampposts, but he was told that, according to the government interventions, it could take some 40 years to finally have street lamps installed (C35). However, Don Mauro saw an opportunity in the

participatory budget, and he was determined to seize it. Aware of the two votes that each citizen was allowed, Don Mauro sat outside the voting station during the month of the public vote phase of “*Cananea tu decides*.” He approached people before they voted, and talked to them about what he was asking for and why he was motivated, encouraging people to vote for this proposal (C121). The proposal for street lighting for Las Huertas is one of the winning (and completed) activities of “*Cananea tu decides*.”

Finally, as for the World Bank’s Social Accountability Pilot, key informants from the implementing partner and the counterpart reported that there was an agreement to have the Social Accountability Computer System (SICS) 3.0 ready for use by the end of the previous administration (C72, C83). The new team at the MPA received the system and its documentation, but, according to a top public official (C156), the Ministry decided not to adopt the platform, as there were concerns about whether it could be used politically or a way to whitewash corruption.

### *Most Significant Change – Public Integrity Component*

The Open Government Policy Paper and Diagnostic of the Participa platform were partially effective, as authorities have not used them. The main reason was the impasse in the Open Government Action Plan implementation process due to a scandal of government espionage on CSOs (World Bank, 2018), and to changes in the Ministry of Public Administration’s priorities (C83). The contents of the proposed financial disclosure template, although effectively developed by multiple actors, were not incorporated in the final format approved by the SNA Coordinating Committee (C14, C83, C137).

In terms of the most significant change, according to one participant (C171), the “International Workshop on Experiences in Data Analytics and Financial Disclosure Administration to Promote Public Integrity” of May 2017 “was like a kickoff. It was a significant event because from it many collaborations arose, such as the financial disclosure formats, the workshops on the use of open and closed data, systems for the analysis of information, and other smaller activities.” This key informant asserts that the most significant change was the ability of the World Bank to introduce the issue of conflicts of interest into the anti-corruption agenda (C171).

The World Bank performed this and other capacity-building activities related to illicit enrichment and conflict of interest, where different actors from the Ministry of Public Administration (e.g., Ethics’ Unit staff), the SNA Citizens Participation Committee (CPC), the National Institute of Transparency, and Access to Information and Protection of Personal Data (INAI), and CSOs (e.g., Transparencia Mexicana) participated (C14; C79; C83, C171; World Bank, 2018)

According to another interviewee, the activities of the Public Integrity Component provided evidence that allowed for a better understanding of conflicts of interest by the Ministry of Public Administration’s staff and consequently an improvement of the capacities of this institution to address the problem via knowledge transfer that was highly appreciated by public officials (C79). This public official admits that the experts’ talking and comparing experiences on conflict of interest has been useful for the Ministry of Public Administration, in terms of the understanding of the problem (C79). In the view of another informant, the World Bank has been very useful when selecting speakers and panelists: “You cannot say ‘this case is not Mexican, you cannot adopt or learn something from it,’ instead, we finish adopting everything” (C171). Therefore, participants identified as a significant change the improvement of their knowledge about conflict of interest resulting from the capacity-building activities.

Another significant change is related to policy-making. The National Anti-Corruption Policy proposed by SESNA received a peer review facilitated by the World Bank. One interviewee pointed out the usefulness of the comments and that the SESNA’s staff agreed with most of the recommendations received (C171). As a result, they redrafted some elements proposed in the National Anti-Corruption Policy (C18). Also,

this feedback by the World Bank, as an impartial third party, provides legitimacy to the document (C171). This activity improved this policy, which is expected to be approved by the end of 2019.

**Table 30. Program Contribution to the World Bank Global Partnership for Social Accountability – Factors Affecting the Activity**

| Internal                                    | External                                                                                      |
|---------------------------------------------|-----------------------------------------------------------------------------------------------|
| ✓ Counterparts value World Bank's expertise | ✓ Champions with leadership (mostly in Component 1, except for Social Accountability Process) |
| ✓ World Bank's convening authority          | ✗ The new head of MPA changing priorities                                                     |
| ✗ No cooperation agreement signed           | ✗ Lack of ownership by key authorities within the MPA (Social Accountability Process)         |
| ✗ Insufficient monitoring and evaluation    | ✗ Lack of political will (Component 2, Financial Disclosure Format)                           |

The effectiveness, enabling factors, and constraints vary between activities, even within the same component. The Open Government Component, the Open Contracting, and Participatory Budget pilots had high-level champions, while the Social Accountability Process had neither champions nor ownership within the Ministry of Public Administration (C11, C35, C83). In the case of the Financial Disclosure Format, the World Bank used its convening authority that allowed the joint work between various actors (C11, C14, C171). Despite that, different stakeholders concur in pointing out the lack of political will, expressed in constant delays for the final approval of the format and the decision to reject the proposed new data fields in the approved version (C14, C48, C83, C118, C137). Another external factor that affected the activity was the change in the Ministry's priorities by 2017 that forced a major revision of both components (World Bank, 2018; C83).

Particularly in the case of the EDCA MX, it was tailored to the needs and priorities of the country. In essence, stakeholders were pushing in that direction, and it had champions, particularly at the MPA and Ministry of Finance, to move forward the intervention. Having a third party with the technical know-how also encouraged CSO collaboration, in this case, from Transparencia Mexicana (C79, C171). Public officials, engaged in all World Bank's components, also valued its technical expertise (C14, C18, C35, C79, C171).

From a broader perspective, key informants from different counterparts have a favorable opinion of the World Bank's expertise (C14, C18, C35, C79, C171). However, there were two important internal constraints. First, the lack of a signed cooperation agreement between the World Bank and the Ministry of Public Administration was an obstacle to implementing activities (C11, C83). Second, insufficient monitoring and evaluation made it challenging to monitor GPSA's progress, because only one annual report (January 2017 to June 2018) was released.

### *Lessons Learned*

The most important lesson learned by the World Bank and the counterparts is the need for a memorandum of understanding or a clear cooperation agreement that formally specifies the commitments of those involved. It would provide the activity a clearer framework by allocating roles and responsibilities (C11,

C83). A verbal expression of interest is not enough; the will and capacity to deliver is also crucial (C11, C83, C171).

Regarding the collaboration between CSOs and public entities, having a third party with the technical know-how is an enabling factor that makes collaboration among public sector institutions and CSOs more probable.

About specific activities, when the participatory budget appeared, the participating population demanded solutions to several infrastructure problems of the locality at the same time. In this sense, according to informants, it is essential to make citizens' expectations clear, explaining the range and real possibilities of the available resources (C35, C121). Then, authorities can prepare residents for future participatory budgeting rounds to progressively close infrastructure needs in each new participatory cycle, with the collaboration of the people.

### *Sustainability*

Sustainability of the EDCA MX seems guaranteed for the following years, considering the Contrataciones Abiertas website is operative after eight months. Additionally, the fact that this standard will be used in the National Digital Platform of the SNA and that different regional governments are implementing the EDCA MX, there is a good chance that the benefits of the activity will continue to be felt in the following years.

The SICS 3.0 of the Social Accountability Process is not going to be used by the new administration of the Ministry of Public Administration, as explained by C153. Therefore, it lacks sustainability.

The new administration of the Cananea municipal government has not shown interest in continuing the Participatory Budget activity. Furthermore, the current Secretary of Economy, Graciela Márquez Colín, assured, on October 23, the government has not used the 2019 Mining Fund resources due to a constitutional controversy presented by local authorities critical to the no distribution of monies to local governments (Congress of Mexico, 2019). It means these types of initiatives are vulnerable to priority changes, at both Federal and local levels.

In the case of the Public Integrity Component, the drafting of the financial disclosure is complete; that is why sustainability refers to what to do with the information to be collected. Those actors involved in the template design, including the World Bank, have the challenge of proposing ideas on this matter. So far, the World Bank is attempting to train the Superior Audit Institution of the Federation personnel on artificial intelligence and the use of data on conflict of interest (C83).

### **Conclusions**

The results of the interventions within this activity vary, but most of them reached their targets, and some even outperformed the expectations. For example, the Open Contracting Pilot achieved national and subnational adoption of the EDCA MX and the participatory budget methodology pilot proved to be successful. Less successful were the activities relating to conflict of interest. Even though the World Bank was able to provide technical assistance and support a participatory process to draft the financial disclosure format, their recommendations were not taken on board in the end. Also, the social accountability process was not fully implemented, and the Open Government Guidelines was canceled in 2017.

The know-how of the implementing partner and the collaborative approach was a key factor in those cases that achieved their goals. The lack of champions, involvement from the beginning of the operative units responsible for key processes (social accountability process), and the lack of a signed cooperation agreement appear to be the main cases of failure.

## ***Mexico Economic Policy Program (MEPP) – Abt Associates***

### **Introduction**

MEPP was an activity implemented by Abt Associates from 2017 to 2019, with the goal of assisting the efforts of public institutions and civil society organizations for greater transparency and accountability in the public sphere. The interventions were focused at the national level—mostly through the work with federal institutions—but all of them took place in Mexico City. The amount awarded for this activity was of \$4,750,000 USD for the three-year period.

### **Background**

MEPP's base period ran from April 2013 to March 2016 and was focused mainly on private sector productivity. After its conclusion, it was decided that its two-year option period would concentrate on supporting Mexico's anti-corruption agenda, with the mission of improving the accountability and transparency of government institutions by implementing a range of different activities. With the country going through structural and institutional changes in respect to fighting the deeply entrenched corruption, and with the newly created National Anti-Corruption System (SNA) beginning to operate, the timing was convenient to approach the Government of Mexico (GOM), the private sector, and civil society organizations (CSOs) to look for opportunities to collaborate around the accountability, transparency and anti-corruption agenda.

**Table 31. MEPP Stakeholder Mapping**

| Name                                              | Role                                                                                                               |
|---------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| Comisión Nacional de Mejora Regulatoria (CONAMER) | Major counterpart – Advisor on regulatory improvement legislation, contact with subnational governments            |
| PEMEX                                             | Beneficiary – Received technical assistance for implementing internal reforms                                      |
| Secretaría de la Función Pública (MPA)            | Partnership – Coordinator of the multi-stakeholder group for the Compranet redesign                                |
| Secretaría de Hacienda y Crédito Público (SHCP)   | Beneficiary – Received technical assistance oriented to improving the transparency portal                          |
| Data Civica                                       | Grantee – Organized and imparted the data journalism courses                                                       |
| Consejo Coordinador Empresarial (CCE)             | Major counterpart – Assisted with the planning and execution of the National Observatory on Regulatory Improvement |
| Colegio de México (Colmex)                        | Partnership – Part of the multi-stakeholder group for the Compranet redesign                                       |
| Instituto Mexicano para la Competitividad (IMCO)  | Partnership – Part of the multi-stakeholder group for the Compranet redesign                                       |

### Description of the Activity

MEPP's two-year option period began on April 2016 and ran until March 2018, with a one-year extension period that ended in March 2019. Over its three years of operation, the activity focused on carrying out technical assistance interventions to promote public sector transparency and fight corruption. This work included promoting governance changes at the national and local levels, creating open government tools, and strengthening civil society organizations to hold government accountable for actions and performance. Its interventions were grouped on four main components: (1) civic engagement, (2) regulatory improvement for state and municipal government, (3) reform of public procurement and contracting, and (4) the institutionalization of Mexico's anti-corruption system (Abt Associates, 2018a).

### Components and Objectives

1. Civic Engagement for Open Government (capacity development for journalists): Strengthen the ability of journalists to use open data tools to investigate and report on the use of public sector resources (Abt Associates, 2018c).
2. National Observatory for Regulatory Improvement (*Observatorio Nacional de Mejora Regulatoria*, ONMR) (regulatory improvement at the local level): Assist the Federal Government in pushing local governments to adopt and comply with the mandates contained in the General Law on Regulatory Improvement (Abt Associates, 2019b).

3. Public Procurement Reform (Compranet redesign and public works spending portal): Redesign the federal procurement electronic platform to generate useful data on all phases of government contracting (Abt Associates, 2018a).
4. Implementation of the National Anti-Corruption System (PEMEX Code of Conduct): Promote state government adoption of anti-corruption legislation and increase accountability of PEMEX managers by creating and enforcing a corporate code of conduct (Abt Associates, 2018a).

### **Theory of Change Evaluation**

*Option Period's Theory of Change:* Sustainable adoption of transparency and anti-corruption reforms depends on the capacity and actions of (1) public sector actors, including federal, state, and municipal officials; (2) civil society, including NGOs, journalists, independent researchers, and academic experts; and (3) the business community, especially as represented by private sector associations. While governments may legitimately decide what kind of information promotes the public interest, citizens themselves must have a voice in identifying and demanding access to information needed to hold government decision-makers accountable (Abt Associates, 2019c).

The evaluation team has articulated a Theory of Change for each activity based on the documents and reports of the activities and from interviews. The main identifiable components are I: Intervention, M: Mechanism, and O: Outcome, which were taken from the activity's documentation, and the translation was made by the evaluation team. Context factors, which represent internal and external risks and appear on the sides, were developed by the evaluation team to analyze potential factors that could affect the Theory of Change.

**Figure 10. Theory of Change – Capacity Development for Journalists**

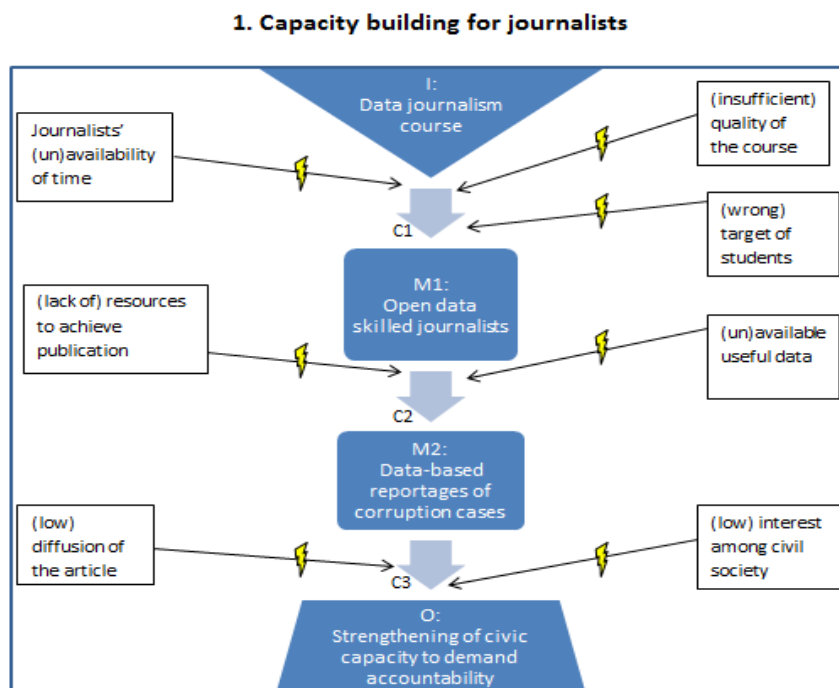


**Figure 11. Theory of Change – National Regulatory Improvement Observatory**

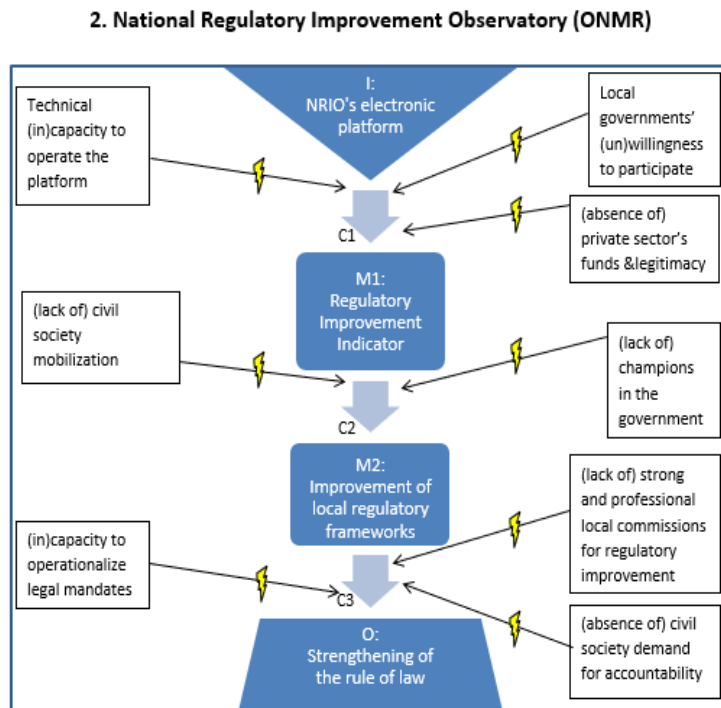


**Figure 12. Theory of Change – Compranet Redesign**

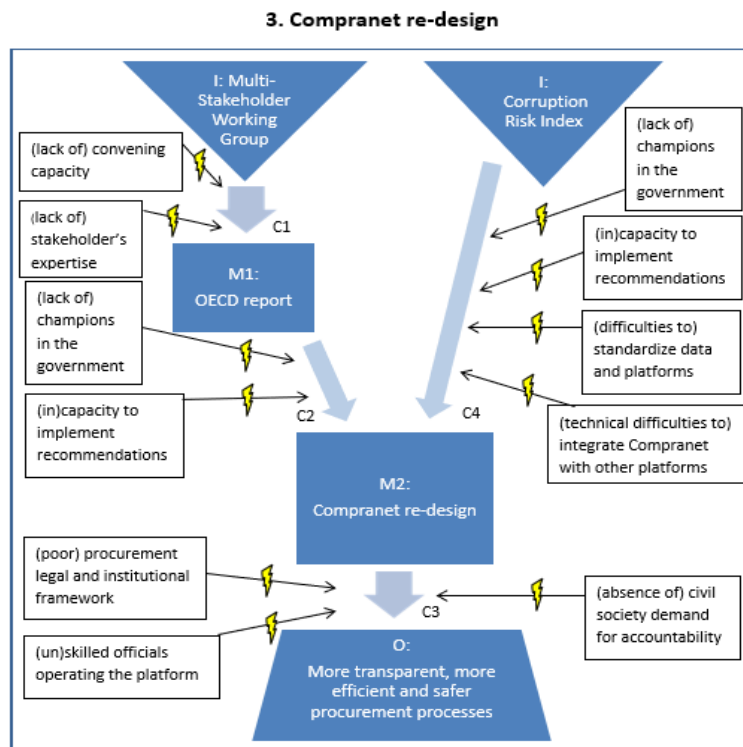


**Figure 13. Theory of Change – Public Works Spending Portal**

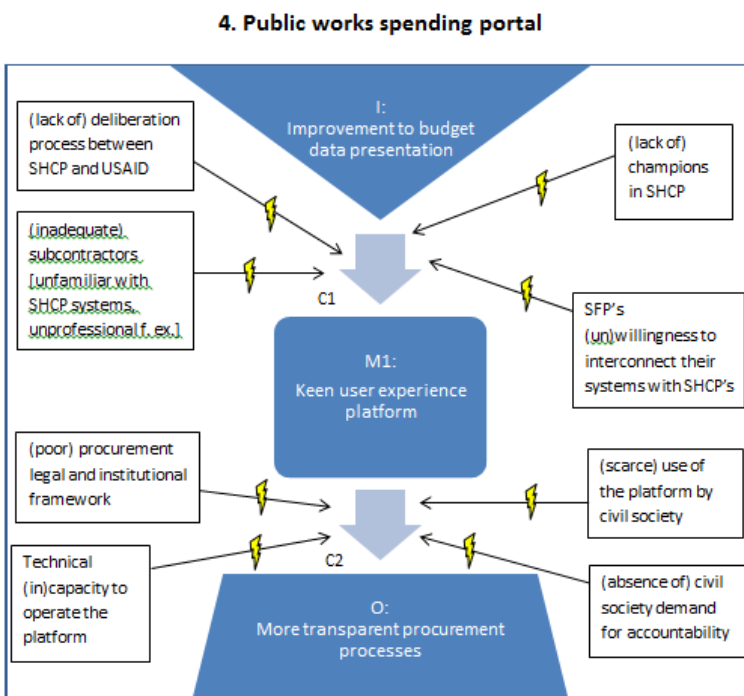
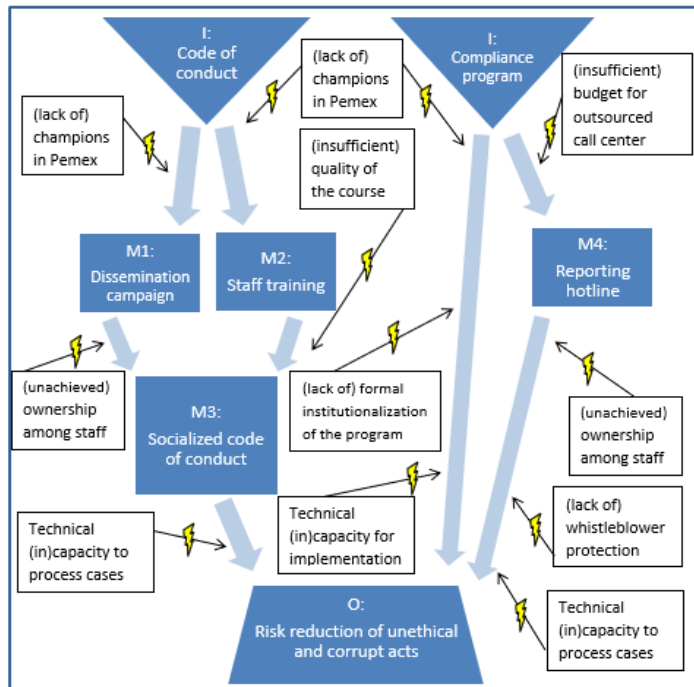


**Figure 14. Theory of Change – PEMEX Code of Conduct**

## 5. Pemex Code of Conduct



## Design Analysis

### *Anti-Corruption Approach*

Because MEPP consists of several different components, the approach for fighting corruption varies between them. Some of them, especially the National Observatory for Regulatory Improvement (ONMR) and the PEMEX Code of Conduct, consist of institutional reforms that reduce information asymmetries and establish a stronger legal framework to discourage engaging in acts of corruption. Others, like the Capacity Development for Journalists, consider how informal networks interact beyond formal institutions, and how a more participative and engaged civil society can consolidate a monitoring and accountability culture. Activities such as the Compranet redesign and the Public Works Spending Portal aim to increase access to information by pushing for greater transparency in procurement processes with the support of sophisticated electronic platforms.

### *Alignment to USAID's Development Objective (DO) and Intermediate Results (IR)*

With the exception of IR 3.3.2.3 (Increased professionalism and impartiality in GOM audit functions), MEPP'S components contribute to all other aspects listed in the DO. All activities (with the exception of the PEMEX Code of Conduct) complied with bolstering non-governmental actors' monitoring capacities—whether civil society or private sector—and encouraging their use of public data and mechanisms for civic participation. This was attained by working with all three sectors across different interventions—civil society with Capacity Development for Journalists, private sector with the ONMR, and the public sector with Compranet and Public Works. Regarding the improvement of GOM technical capacity to implement legal and policy frameworks for transparency, the Compranet and Public Works activities specifically tackle this issue by supporting the development of open data platforms related to public procurement. The PEMEX Code of Conduct put in place institutional mechanisms for avoiding conflicts of interest and promoting internal accountability.

### *Alignment to USAID's Local Systems Framework*

Even if it did not explicitly refer to the LSF, all of MEPP's interventions but the PEMEX Code of Conduct promote engagement and collaboration between different systems of actors, regardless of their objectives or nature. This is probably more evident in the case of the Civic Engagement component, where journalists from all over the country were brought together to take part in a course imparted by Data Cívica—an organization specialized in data journalism—creating a collaborative network of trained professionals from varied news outlets who share similar research interests. In the case of Compranet and the ONMR, governmental and non-governmental actors worked together to tackle existing issues where the GOM required external assistance, weighing on existing alliances as well as creating new and sustainable partnerships.

### *Local Systems Framework 5Rs*

- **Results:** All of MEPP's interventions are designed around achieving specific results by the time they reach their conclusion. In addition, these activities are expected to produce larger changes in the medium to long term by building capabilities among its involved actors, providing technical assistance to governmental and non-governmental entities, and creating sustainable partnerships at the local level.
- **Roles:** Abt Associates performed multiple roles for the activities considered. In some cases, such as the ONMR and Public Works, it acted as a more-active implementer, contributing with specific tasks during their execution. In other cases, such as in the Civic Engagement component, its role was more of a facilitator, delegating most of its execution to Data Cívica. This means that the roles played by the counterparts varied as well depending on the activity. CONAMER and CCE were major counterparts in the ONMR activity, both engaging in the implementation of the activity. Those who participated in the multi-stakeholder group for the Compranet redesign (MPA, Colmex, and IMCO) were partners in the intervention, independent of the support of USAID. Data Cívica held the role of a grantee for the activity it took part in, being almost fully in charge of the activity and responding directly to Abt. Lastly, PEMEX and SHCP were beneficiaries of their respective activities, however they both had an active role and helped with the implementation.
- **Relationships:** All relationships were formal and contractual. However, the hierarchy differs mainly depending on the role that Abt played in the activity—which in turn affects all other actors' roles. In those where it played an active role during the execution, the relationship tended to be more collaborative, as opposed to the larger authority it had when subcontracting third parties.
- **Rules:** Formal/official rules definitely affect the interaction between actors, especially regarding the roles that governmental actors can play. For example, CONAMER found that its limitations coming from its official attributions forced them to find external allies for the Observatory. If non-governmental actors were to leave, the effectiveness of the activity could be endangered.
- **Resources:** Again, these vary greatly depending on the activity and the roles played by the actors involved. However, Abt, as implementer, normally contributed with technical assistance through the expertise of their staff as well as financing the development of electronic tools. Public, private, and civil society institutions tended to focus on their already existing resources and current work.

### **Implementation Review**

**Table 32. MEPP Planned vs. Executed Activities**

| Planned Activities                                 | Implemented | Ongoing | Changed | Comments                      |
|----------------------------------------------------|-------------|---------|---------|-------------------------------|
| 1. Capacity Development for Journalists            | X           |         |         | Continued in Extension Period |
| 2. National Observatory for Regulatory Improvement | X           |         |         | Continued in Extension Period |
| 3. Compranet Redesign                              | X           |         |         |                               |
| 4. Public Works Spending Portal                    | X           |         |         |                               |
| 5. PEMEX Code of Conduct                           | X           |         |         |                               |

MEPP intended—and managed—to promote anti-corruption efforts on different fronts, working with national and subnational governments, the private sector, and CSOs. MEPP’s work led to the modernization of legal frameworks and improvement of local processes (ONMR), the implementation of a code of conduct (PEMEX), the development of civil society’s capabilities for monitoring and demanding accountability (data journalism), and improvements in public electronic platforms (Public Works). Two implementers emphasized the fact that this activity supported a range of diverse activities as an effective way to tackle corruption from multiple angles (C73, C91).

The Compranet redesign intervention, though its planned tasks were implemented, was suspended and abandoned after the transition in the federal government—this is, after MEPP’s involvement ended. According to four interviewees (C43, C91, C131, C150), the incoming administration not only decided to terminate the activity, but is also unwilling to consider the recommendations derived from it and to make public its results. This situation means that all the research and analytical work performed during several months will be remain unused.

#### *Benchmark*

MEPP exceeded all performance targets established for the option period:

**Table 33. MEPP Indicators**

| Indicator                                                                                      | Target | Actual | Percent |
|------------------------------------------------------------------------------------------------|--------|--------|---------|
| <b>Foreign Assistance</b>                                                                      |        |        |         |
| Number of mechanisms for external oversight of public resource use supported by USG assistance | 6      | 7      | 117%    |

| Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Target | Actual | Percent |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|---------|
| <b>Foreign Assistance</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |        |        |         |
| <i>“Mechanism for external oversight” includes an electronic portal, guideline or best practice document, and an activity-specific evaluation or evaluation methodology produced by an organization that is not part of the Mexican government.</i>                                                                                                                                                                                                                                                   |        |        |         |
| <p>Number of people affiliated with non-governmental, research, or journalistic organizations receiving USG-supported anti-corruption training</p> <p><i>“Non-governmental organizations” refers to civic, media, academic, and private sector groups. “Anti-corruption training” refers to capacity-building programs that facilitate the detection or prevention of rent-seeking actions that harm individuals or the public good.</i></p>                                                          | 185    | 264    | 143%    |
| <p>Number of government officials receiving USG-supported anti-corruption training</p> <p><i>“Government officials” refers to employees, managers, appointed officials, and elected officials of governmental institutions at the federal, state, and municipal level. “Anti-corruption training” refers to capacity-building programs that facilitate detection or prevention of rent-seeking actions in business regulation or public procurement that harm individuals or the public good.</i></p> | 115    | 686    | 597%    |
| <b>Open Government</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |        |        |         |
| <p>Number of state and municipal governments that endorse or adopt institutional transparency mechanisms promoted with USG assistance</p> <p><i>Such mechanisms include information standards, legislation, regulation, and executive decrees that relate to transparency or public sector integrity in business regulation or procurement.</i></p>                                                                                                                                                   | 15     | 26     | 173%    |
| <p>Number of civil society, private sector, international development, and educational organizations that support the institutionalization of USAID transparency initiatives</p> <p><i>This indicator refers especially to active membership in and contribution to a MEPP-supported multi-stakeholder alliance.</i></p>                                                                                                                                                                              | 13     | 14     | 108%    |
| <b>Civic Engagement</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |        |        |         |

| Indicator                                                                                                                                                                                                                                                                                                           | Target | Actual | Percent |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|---------|
| <b>Foreign Assistance</b>                                                                                                                                                                                                                                                                                           |        |        |         |
| <p>Number of open government articles or data visualizations published in the Mexican press or internet-based media outlets by recipients of data analysis capacity-building</p> <p><i>Articles or data visualization must include annotated bibliographic information and (wherever available) a web link.</i></p> | 15     | 21     | 140%    |
| <p>Number of organizations that support MEPP-supported transparency initiatives</p> <p><i>Organizations must have a written commitment of their own resources to continue supporting an initiative created through USAID assistance.</i></p>                                                                        | 10     | 13     | 130%    |

For the extension period, MEPP met or exceeded all performance indicators:

| Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Target | Actual | Percent |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|---------|
| <b>Foreign Assistance</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |        |        |         |
| Number of mechanisms for external oversight of public resource use supported by USG assistance<br><br><i>“Mechanism for external oversight” includes an electronic portal, guideline or best practice document, and an activity-specific evaluation or evaluation methodology produced by an organization that is not part of the Mexican government.</i>                                                                                                                                     | 5      | 5      | 100%    |
| Number of people affiliated with non-governmental, research or journalistic organizations receiving USG-supported anti-corruption training<br><br><i>“Non-governmental organizations” refers to civic, media, academic, and private sector groups. “Anti-corruption training” refers to capacity-building programs that facilitate the detection or prevention of rent-seeking actions that harm individuals or the public good.</i>                                                          | 50     | 85     | 170%    |
| Number of government officials receiving USG-supported anti-corruption training<br><br><i>“Government officials” refers to employees, managers, appointed officials, and elected officials of governmental institutions at the federal, state and municipal level. “Anti-corruption training” refers to capacity-building programs that facilitate detection or prevention of rent-seeking actions in business regulation or public procurement that harm individuals or the public good.</i> | 85     | 375    | 441%    |
| <b>Open Government</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |        |        |         |
| Number of state and municipal governments that endorse or adopt institutional transparency mechanisms promoted with USG assistance<br><br><i>Such mechanisms include information standards, legislation, regulation, and executive decrees that relate to transparency or public sector integrity in business regulation or procurement.</i>                                                                                                                                                  | 9      | 20     | 222%    |
| Number of public schools that adopt Escuela de Heroes<br><br><i>Evidence of a school’s adoption of Escuela de Heroes curriculum includes formal letters from individual schools or SEP managers.</i>                                                                                                                                                                                                                                                                                          | 5      | 7      | 140%    |

| Indicator                                                                                                                                                                 | Target | Actual | Percent |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|---------|
| <b>Civic Engagement</b>                                                                                                                                                   |        |        |         |
| Number of open government articles or data visualizations published in the Mexican press or internet-based media outlets by recipients of data analysis capacity-building | 15     | 17     | 113%    |
| <i>Evidence of civic engagement include articles or data visualization with annotated bibliographic information and (wherever available) a web link.</i>                  |        |        |         |

## Main Findings

### Results

Overall, MEPP achieved important results and was effective in promoting significant changes in different areas. In general, beneficiaries agreed that the support of USAID was a key factor for the success of its interventions (C32, C81, C105, C111, C149). More specifically, there are several outcomes across MEPP's components that deserve to be highlighted.

The Capacity Development for Journalists intervention produced a series of journalistic investigations that exposed wrongdoings within the federal government which, in some cases—such as the Estafa Maestra and Detrás de los CLAP—ended in formal accusations of corruption. As an informant pointed out, “Many of the most important corruption-related investigations are closely linked with journalists’ capabilities for doing research” (C73, C119). In addition, the creation of a network of trained journalists, researchers, and media outlets was highlighted as an important outcome with an impact that can outlast the activity itself (C73, C91). The Regulatory Improvement intervention created an important collaboration between the private sector and the three levels of government for greater transparency in relation to regulatory improvement. In this case, civil society served as an important ally for implementing legislative changes and institutional reforms (Abt Associates, 2019c). Informants report that this activity pushed the participating governments to implement legislative modifications and changes to their day-to-day processes, even when the original intention was only disseminating information about the status of the regulatory improvement policies around the country, with the outstanding example of Mexico City’s government (C32, C113, C141). In the case of the PEMEX code of conduct, an important outcome was the fact that internal cultural and behavioral changes were perceived even from the most unexpected actors, such as union leaders (C81, C105, C149).

Even though the Public Works spending portal and the Compranet redesign interventions face sustainability issues because of the transition in the federal government, there were still relevant results. For instance, a former public official commented on the unexpected uses that the visualization tool implemented in conjunction with MEPP had, as it allowed increased transparency in the allocation of funds in dealing with the consequences of the 2017 Mexico City earthquake (C111). For the Compranet case, many participants pointed out the fact that it managed to get together a multi-stakeholder group composed of public institutions, international organizations, CSOs, and private sector representatives with the same goal in mind. This alliance could set ground for future collaborations if the GOM is willing to continue collaboration with the stakeholders involved (C43, C91, C131, C150).

## Factors Affecting the Activity

**Table 34. MEPP Factors Affecting the Activity**

| Internal                                                                                                                                | External                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| ✓ Abt's long-lasting collaboration with USAID, facilitating the alignment of its activities with USAID's objectives                     | ✓ National Law on Regulatory Improvement being strongly pushed by CONAMER                                                  |
| ✓ Abt's network of working partners from CSOs, private entities, and GOM institutions                                                   | ✓ Availability of public information from official sources                                                                 |
| ✗ Chain of command confusing for beneficiaries, with the roles of Abt, USAID, and (in some cases) subcontractors not being clear enough | ✗ New federal administration entered office just after most activities concluded, affecting their potential sustainability |

Abt encountered minor issues for executing its interventions, with the only important obstacle being the new administration's reluctance to rely on work done by its predecessor—though this affects only potential sustainability, and was not a considerable problem during implementation. Abt managed to rely upon its experience working with USAID and both governmental as well as non-governmental institutions to adequately implement all activities in a timely manner. The network of working partners with which Abt collaborated in many of the interventions was also a key aspect for their success, especially in the case of the data journalism course (with Data Cívica) and the Observatory (with CONAMER and CCE).

## Lessons Learned

There are important takeaways from MEPP's varied approaches in implementing its components. MEPP showed that working with public institutions can be as effective as working with civil society to demand changes in how federal and local governments operate (Abt Associates, 2019c). Also, informants commented that technical assistance should be prioritized over creating research reports or playing an advisory role, stressing on the difficulty of passing from theory to action as well as the complicated politics and time-consuming aspects of participating on committees or large working groups (C91, C131). It also showed that supporting efforts at the local level is key for advancing anti-corruption measures nationally (C32, C73, C91). It is important, though, for efforts to be oriented to improving specific aspects of local governance.

## Sustainability

In general, and based on activity documentation and statements from implementers and beneficiaries, all interventions but the Compranet redesign were considered to be sustainable or, at least, not entirely dependent on USAID's assistance to keep on fulfilling its objectives. The Data Journalism component, as it worked on developing capabilities among its participants and succeeded in creating a network of trained journalists, will probably continue to see results in the future (C119). The Public Work's spending portal involved merely supporting the introduction of data visualization tools (maps), so its results will still be there as long as the portal continues to exist and be updated (it does as of November 2019). The

Regulatory Improvement intervention, given the amount of support from public and private institutions, and considering that it is now backed by a federal mandate, has continued to operate without USAID's support; however, informants did note that it has been a more difficult task without its participation (C32, C113, C141). It is unclear whether the ethics and due diligence programs implemented for PEMEX will continue to operate in the following years because there is ambiguity about how actual routines and processes are in place to assure compliance. Though they do as of 2019, informants commented on the difficulties to continue to carry the necessary actions on their own (C105, C149). The only intervention with no foreseeable future work is the Compranet redesign, because it was terminated by the new administration.

## **Conclusions**

Based solely on performance indicators, it is clear that MEPP's option and extension periods achieved the goals that were set from their inception. However, the true impact of this program cannot be properly assessed based on this data. According to the activities' documentation (especially the final report) and to the implementers and beneficiaries' impressions, the effectiveness of the five assessed intervention varies. Overall, it can be concluded that there is a larger incidence in activities where there is a close collaboration with GOM entities, where the work is focused at the local level, and where efforts are oriented to technical capacity development. However, participation in activities that require a considerably high level of political will and commitment from a number of different actors in order for them to progress—as in the case of the Compranet redesign—should be carefully evaluated and considered because they tend to be overly complex and involve a greater risk.

## ***Soy Honesto Hoy – Consejo Cívico de las Empresas de Nuevo León A.C. (CCINL)***

### **Introduction**

*Soy Honesto Hoy* (SHH) was an activity designed and implemented by the *Consejo Cívico de las Instituciones de Nuevo León A.C. (CCINL)* in Monterrey's metropolitan area during 20 months, starting in October 2017 and finishing in April 2019. USAID invested USD 980,000. The activity aims to contribute to reducing the frequency and intensity with which the people consider corruption as a regular practice and sees it as something natural and with no solution (CCINL, 2019f). The activity aimed to promote awareness and active citizenship on the subject.

### **Background**

The SHH idea came from the experience of the *Soy Capaz* implemented in Colombia during 2014, a communication campaign using mass consumption food packaging with messages for the reconstruction of peace. In 2015, CCINL presented the concept to USAID originally named “Nuevo León Transparency Public Outreach Campaign,” replicating the Colombian strategy. Initially, the desired outcome was pressure to prosecute corruption from the public sphere (C126), specifically pushing decision-makers to reform the law to include citizen participation in fighting corruption, even before the SNA creation. By the time the implementation began (2017), SEA was already operating.

To respond to the new framework created by SNA, the SHH Campaign was reframed to focus on promoting honesty through shared responsibility. CCINL combined efforts with other local civil society actors that had experience with initiatives against corruption; for instance, *Cómo Vamos Nuevo León* (2012), *Hagámoslo Bien* (2013), and *Coalición Anticorrupción* (2016) where the CCINL also had an active role as a founder or participant.

From the beginning, SHH looked for a broad alliance with local actors, such as companies and CSOs working an anti-corruption agenda, and among other stakeholders such as universities, schools, artistic groups. According to informants, local citizens and organizations were interested in working on transparency and integrity issues (C29, C44, C70, C126).

Stakeholder relations were under the responsibility of an SHH team member: Carolina Alvear was in charge of establishing relationships with the private sector, Amparo Menchaca with civil society organizations, and Lorena Chapa with the media outlets. The reports stated that the campaign involved more than 58 actors, 18 CSOs, 31 companies, six universities, 14 media, and four business chambers (CCINL, 2019c; CCINL, 2019d; CCINL, 2019f). Some of the data did not match across reports, but the effort is considered substantial.

**Table 35. SHH Stakeholder Mapping**

| Role              | Organization                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Subcontractors    | <ul style="list-style-type: none"> <li>• Tarín Contreras (communication agency)</li> <li>• Hagámoslo Bien (workshops)</li> <li>• Shot Studio (website)</li> <li>• Great Plan (media strategy)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Companies         | Arca, Axtel, Cemex, CINTERMEX, Farmacias del Ahorro, Gibraltar, Grupo Promax, Heineken, Home Depot, Coflex, Prolec, Sigma Alimentos, Teleperformance, Ucalli, Xignux, Grupo Hotelero Prisma, Frisa, Proshow, MPV Management, Grupo Ormex, Victoria Films, Great Plan, Avanza, Quálita Alimentos, Bydsa, Viakable, Voltrak, Scharder Camargo, Fibra Inn, and Shot Estudio Identidad Digital                                                                                                                                                                                                                                                                                                |
| Media Outlets     | El Norte, Milenio Monterrey, El Horizonte, Publimetro Monterrey, Publimetro, El Porvenir, ABC Noticias, Multimedios Televisión, Televisa Monterrey, TV Azteca Noreste, Dominio FM, Núcleo Radio Monterrey, Frecuencia Tec, TV, and Radio UANL                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| CSOs              | ANCIFEM, Barra Mexicana Colegio de Abogados, A.C. Capítulo NL, Cambiando Vidas ABP, Ciudadanos contra la corrupción, CEEAD, Club Rotario de Monterrey, Centro Eugenio Garza Sada. Despierta, Cuestiona y Actúa (Ciudadanitos), Evolución Mexicana. Formando Emprendedores (Pequeños Ciudadanos), Hagámoslo Bien, Líderes Ciudadanos en Pro de la Cultura de la Legalidad, Museo de Arte Contemporáneo de Monterrey, No A Conducir Ebrio (NACE), PazEs, Porter Tae Kwon Do, Papalote Museo del Niño, Planetario Alfa, Red Papaz, Reforestación Extrema, Unión Neoleonesa de Padres de Familia, Vértebra, Vía Educación, Cómo Vamos Nuevo León, Incorruptible, and Coalición Anticorrupción |
| Universities      | Instituto Tecnológico y de Estudios Superiores de Monterrey, Universidad de Monterrey, Universidad Regiomontana, TecMilenio, Universidad Metropolitana de Monterrey, Facultad Libre de Derecho de Monterrey                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Business Chambers | Cámara de la Industria de la Transformación de Nuevo León (CAINTRA), Cámara Nacional de Comercio Servicios y Turismo de Monterrey (CANACO), Cámara Nacional de la Industria de Desarrollo y Promoción de Vivienda                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| Role | Organization                                                                     |
|------|----------------------------------------------------------------------------------|
|      | (CANADEVI), Confederación Patronal de México, and Capítulo Nuevo León (COPARMEX) |

### Description of the Activity

The interventions were implemented within Monterrey's metropolitan area, covering 11 municipalities. The main component was a communication campaign that lasted three months. The activity rolled out in four phases: (1) planning and defining the message, (2) multi-sectoral linkage, (3) communications campaign, and (4) assessing outcomes of the campaign (CCINL, 2019f).

As a result of the creation of the SNA, the CCINL reframed the message for the communication campaign. The narrative created was very empathetic to the local inhabitants because it aimed at returning to the core civic value of honesty (C5, C70, C109, C126). The central premise was that acting honestly is always a personal decision; corruption is not an embedded routine and it can be eradicated. Each person is an agent of change in spaces such as universities, companies, or on the streets. Additionally, it decided not to use the labeling of mass consumption products as in the Soy Capaz program in Colombia and use artistic interventions to increase awareness of everyday corruption. CCINL started by recognizing that there are local initiatives for fighting corruption. For the activity to succeed, it was necessary to work within the existing network (C70, C126) while introducing a greater emphasis on promoting honesty and co-responsibility.

### Objectives and Components

*Soy Honesto Hoy's* main component was a communication campaign that serves as a framework to include three different sets of activities (CCINL, 2018b):

1. Creating artistic interventions (plays, flash mobs, musicals, and urban paintings)
2. Convening collaborative actions with local stakeholders (CSOs, universities, and companies)
3. Launching a traditional communication campaign (off-line and online)

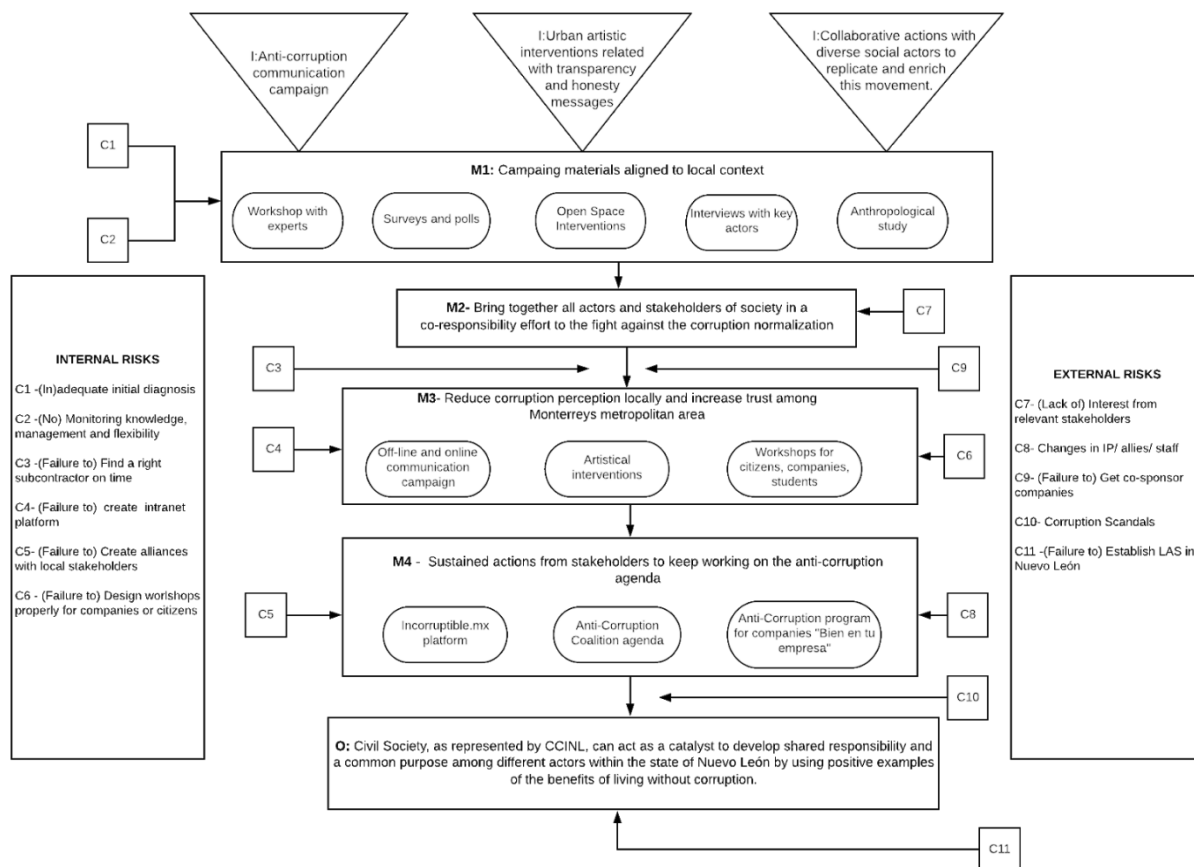
The objective was to denormalize everyday corruption through disseminating a message based on honesty communicated through multiple stakeholders.

### Theory of Change Evaluation

SHH's theory of change as stated in their report (CCINL, 2018b) is: Civil Society can act as a catalyst to develop shared responsibility and shared purpose among different actors within Nuevo León state by communicating examples of the benefits of living without corruption.

The theory of change is partially aligned to the USAID strategy because it contributes to achieving critical mass but it does not aim at strengthening government capacity in anti-corruption and integrity issues. Additionally, it does not clarify the expected effects; it is only possible to articulate the desired impacts through subsequent reports and interviews. The objective is to reduce the perception of the normality of corruption.

**Figure 15. SHH's Theory of Change**



## Design Analysis

### Anti-Corruption Approach

The anti-corruption approach of the activity is aligned with the anthropological approach, which takes into consideration the context, where one may or may not perceive a practice as corrupt. Based on consultation with experts and other stakeholders, the CCINL adopted a definition of corruption consistent with the goal of the activity: taking advantage of the position held for one's own benefit (public or private office) (CCINL, 2019f). "Corruption is not only a problem of government but also of the private sector, and it can affect people's daily actions. Until we realize that corruption is normalized, there will be no progress" (C15).

The approach was to understand corruption as a personal decision accompanied by a call of action to retake honesty values (C70).

### Alignment to USAID's Development Objective and Intermediate Results

Through the analysis of SHH reports (CCINL, 2018b; CCINL, 2019f), the assessment showed a relative alignment to USAID's Development Objective (DO) Intermediate Result (IR) 3.3 GOM accountability and transparency strengthened and sustained. This alignment materialized agreements of collaboration signed between two local governments and the Special Anti-corruption Prosecutor Office to adopt the Incorruptible platform to denounce acts of corruption (C5; CCINL, 2019). Additionally, the activity

persuaded candidates (some of whom are now elected public officials) to agree on an anti-corruption agenda.

Here are the findings for the Intermediate Results assessment based on SHH final report (CCINL, 2109f):

- IR 3.3.1 *Non-governmental actors' capacity to advocate and demand the implementation of anti-corruption reforms.* Through capacity development workshops as well for citizens, allies, and students from different local universities on the culture of legality, the campaign enhanced local actors' capacities.
- IR 3.3.1.1 *Citizens, civil society, and the private sector increase collaboration through multi-actor coalitions.* As a result, SHH gathered more than 50 local stakeholders from different backgrounds. The activity catalyzed creating new alliances as (*Hagámoslo Bien*) temporal alliances (*Coalición Anticorrupción*) and strengthening preexisting efforts (*Cómo Vamos Nuevo León*), that still very active on following up the SNA local mechanisms, stakeholders, and results.
- IR 3.3.2.2 *Greater transparency in GOM procurements* and 3.3.2.4 *Key GOM and private sector entities operate with fewer conflicts of interest.* The ally *Hagámoslo Bien*, as part of the sustainability phase, created a program *Bien en tu Empresa* to promote accountability and transparency within the private sector.

#### *Alignment to USAID's Local Systems Framework*

There is neither acknowledgment of Local Systems Framework (LSF) in the activity's documentation, nor stated knowledge of it by the implementing partners. Nonetheless, many characteristics move toward this approach, as stated in the activity final report (CCINL, 2019f).

- **Results:** All SHH's activities were designed around achieving specific results by the time they reach their conclusion. Also, these activities are expected to produce more significant changes in the medium to long term. For example, by continuing on with specific actions that emerged from/for the campaign, such as municipalities and public entities adopting a platform for corruption reports, citizens, civil society, and the private sector can follow up on congress's work on the anti-corruption agenda and building capacities among companies to strengthen integrity processes.
- **Roles:** CCINL performed multiple roles using their expertise and convening authority to mobilize different actors to participate. In the first place, as steward and implementer, it contributed. In other cases, such as in the workshops, its role was more of a facilitator, delegating most of its execution to their ally *Hagámoslo Bien*. The roles played by the counterparts varied as well, depending on the activity and level of commitment. *Hagámoslo Bien* and *Coalición Anticorrupción* were major counterparts to ensure sustainability, both engaging in obtaining public commitments from candidates and public entities. Those who participated in the recollection of local stories and designed measurement tools were subcontractors in the activity. Media outlets were amplifiers of the campaign, and some of them, also allies. Lastly, local companies had dual roles, as beneficiaries and co-founders.
- **Relationships:** All relationships were formal, some contractual or signing a cooperation agreement (C5). However, CCINL had the highest hierarchy, always procuring a collaborative relationship among stakeholders involved in creating online and off-line spaces to interact and get feedback. A distinctive characteristic was a committed role from the private sector and universities (C8, C44; CCINL, 2019f).
- **Rules:** All the stakeholders signed a letter of intention, acting as official rules defining interaction among them, differentiating by the level of commitment—primary, intermediate, or high. Companies could also become co-founders by giving 55,000 pesos (2,750 USD approximately) as a donation to have access to workshops and communication material to replicate inside their organizations.

- **Resources:** SHH comprises installed capacities and resources in CCINL, primarily financial support from USAID complemented by companies. Also, the campaign received donations in the subway (Metrorrey) as publicity spaces or got to use venues such as Cintermex facilities for free to install artistic interventions.

## Implementation Review

### *Planned vs. Implemented Activities*

At the moment of the evaluation, all activities have been concluded and documented, with the following results: 15 companies and 18 CSOs participated in workshops, and 31 companies were sponsors' allies. About presence in media, there were 67 mentions in local media, 6 interviews, and 32,174 visits to the website. Results of the artistic interventions include 10 murals painted, 2,886 attendees at musicals, and 7,233 spectators at plays (CCINL, 2019f). In general, all activity implementations occurred smoothly, with minor changes to address unforeseen circumstances.

The activity objective changed. Initially, it aimed at supporting legal reforms to allow civil society groups to fight corruption. After the creation of the SNA, this was no longer relevant (C126). Instead, the campaign adopted the goal of denormalizing daily corruption acts. The distinctive element of the activity was choosing a positive message referring to honesty instead of focusing on the concept of corruption. The CCINL also decided not to use the labeling of mass consumption products as in the Soy Capaz program in Colombia, because it did not have enough time and it also realized that peace and corruption required different narratives (C70). Instead, it chose to communicate narratives or stories through artistic interventions.

Two digital tools were used for the activity. The first was a website created by the SHH team as a repository for the information, images, instructions, and all the communication material and about the communication campaign (CCINL, 2019f), accompanied by targeted workshops for allies communications teams, to guide them on how to use campaign materials (C8, C44, C70). The second tool was the Incorruptible platform, created to receive citizen complaints on corruption acts; this tool was developed by an ally and resulted adopted by two municipalities as part of the sustainability phase (CCINL, 2019f). Incorruptible has no longer been updated for reasons unknown by the evaluation team.

**Table 36. Planned Activities vs. Implemented Activities**

| Planned activities                                                       | Implemented | Ongoing | Changed | Comments                                                                      |
|--------------------------------------------------------------------------|-------------|---------|---------|-------------------------------------------------------------------------------|
| Artistic interventions (murals, plays, flash mobs, and musicals)         | X           |         |         |                                                                               |
| Communication materials for companies and CSOs                           | X           |         |         | Created a website to host the materials and gave to allies branding workshops |
| Workshops for companies and CSOs on transparency and culture of legality | X           |         | X       | Less successful than expected,                                                |

| Planned activities                                     | Implemented | Ongoing | Changed | Comments                                                               |
|--------------------------------------------------------|-------------|---------|---------|------------------------------------------------------------------------|
|                                                        |             |         |         | reduced number of workshops                                            |
| Co-creation workshops with specialists                 | X           |         |         |                                                                        |
| Evaluation of corruption normalization                 | X           |         | X       | Created a measurement tool (Normalizómetro)                            |
| Anthropological analysis of daily corruption practices | X           |         | X       | Originally planned as a poll, but changed the analysis method and tool |

### *Benchmark*

CCINL fulfilled and even excelled the SHH targets except the one related to get companies to participate because the requirements to donate for the campaign with a short notice this requisite resulted difficult for companies with rigid processes for donation or inadequate for companies that already make yearly contributions to CCINL (C15, C70, C126). Another benchmark challenging to achieve was getting enough people attending the workshops—the main explanations were about the location and duration, and were not differentiated for the workshops, as a lesson learned they have to go to the company's facilities (C5, C8, C44, C109).

**Table 37. SHH Indicators**

| Indicators                                | Baseline | Target | Actual | Percent |
|-------------------------------------------|----------|--------|--------|---------|
| Mentions of the campaign on local media   | 0        | 60     | 67     | 112%    |
| Visits to the website during the campaign | 0        | 25,000 | 32,174 | 129%    |
| Companies participated in workshops       | 0        | 30     | 10     | 33%     |
| Change in the perception of corruption    | 8.6      | 7      | 6.7    | 95.7%   |
| Companies involved                        | 0        | 30     | 31     | 103%    |
| CSOs involved                             | 0        | 20     | 31     | 155%    |
| Educational institutions involved         | 0        | 4      | 9      | 225%    |

| Indicators            | Baseline | Target | Actual | Percent |
|-----------------------|----------|--------|--------|---------|
| Workshop participants | 0        | 300    | 371    | 124%    |

## Main Findings

### Results

The most significant change identified by the implementing team was the reduction of corruption normalization after the campaign. On a scale of 0 to 10, the pre-campaign score was 8.6, and post-campaign was 6.7, which suggests a decrease in the normalization level (CCINL, 2019c) measured by the Normalizómetro, a statistical tool created for establish a baseline in the activity. Even though the finding is promising, it cannot be isolated from the possible influence of other parallel campaigns (C103; CCINL, 2019c, p.153).

Even though the activity did not target public officials as main participants or beneficiaries, CCINL succeeds in acting as external pressure, causing an unexpected significant change by obtaining local candidates' commitment to implement integrity strategies in their agendas. In 2018, 166 local candidates running in elections signed the anti-corruption and transparency pledge (#NLSinCorrupcion agenda). Also, two metropolitan municipalities—Escobedo and San Pedro de los Garza—adopted the *Incorruptible*,<sup>24</sup> a platform for collecting citizen reports of possible corruption cases. Additionally, the Special Anti-Corruption Prosecutor's Office signed a commitment to receive and investigate the possible commission of crimes identified thanks to the Incorruptible platform (C5, C44, C46, C51, C166; CCINL, 2019f).

Of all the candidates who signed, 32 were elected: 21 as members of the local congress and 11 as city mayors (CCINL, 2019c). In practice, half of the newly elected members of the local legislature are committed to an anti-corruption agenda and. As a gesture of goodwill, they have proposed a public plan to pass a new administrative responsibilities law, although no concrete steps had been taken in this direction as of October 2019. It is also worth pointing out that 71 percent of all the congressmen published their #3de3 declaration.

Externally, “providers and allies report that they stopped doing specific actions at a personal level” (C5) as a result of the campaign, because they realized that some normalized practices or behaviors could be considered as corrupt (C5, C8, C44). For example, “pay extra money to buy alcohol after the allowed time or not buying resale tickets for soccer matches.” Internally there were changes in perception within the organization; now the CCINL team considers that they have the “ability to identify when facing a corruption dilemma” (C50).

Drawing from the anthropological study, as an unexpected output CCINL published a book containing 49 stories on daily corruption that began to be used as educational material within universities that joined to the campaign (C70, C103; CCINL, 2019f)

The internal factors affecting the project were overall positive. The first factor was CCINL social capital and convening authority in Nuevo León (C44, C126, C166), the second was the narrative along with empathic messages to locals, presented through plays, flash mobs, musicals, and murals (C70, C103, C109, C115; CCINL, 2019f). It was created from the anthropological study results that also built upon the existing anti-corruption framework (C109, C115, C126; CCINL, 2019f). The most important positive

<sup>24</sup> Apparently it is no longer in use because of Incorruptible's lack of funding (therefore there is no platform maintenance).

external factor was the local CSO's experience with anti-corruption efforts before the implementation of SHH (C15, C126; CCINL, 2019c).

One negative factor that affected SHH's performance was the difficulty in obtaining sponsorships from local companies; because they usually donate money to CCINL yearly, they were not willing or able to provide extra money (C109, C115, C126; CCINL, 2019). Regarding the political context, the candidates running in the 2018 election who were incumbents tried to gain electoral advantage by taking credit for the SHH campaign (C5, C15, C109).

#### *Factors Affecting the Activity*

**Table 38. SHH Factors Affecting the Activity**

| Internal                                                                                                             | External                                                                         |
|----------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| ✓ CCINL had social capital and convening authority in Nuevo León.                                                    | ✓ There were CSOs and companies taking action against corruption.                |
| ✓ Narrative and communication were designed according to the local context.                                          | ✗ Politicians running for elections tried to take credit about the SHH campaign. |
| ✓ CCINL integrated the existing anti-corruption local framework to build on it.                                      |                                                                                  |
| ✓ Artistic interventions were successful in communicating the complex concept of corruption.                         |                                                                                  |
| ✗ It was difficult to establish alliances with companies that were willing to pay for participating in the campaign. |                                                                                  |

#### *Lessons Learned*

The main internal lesson, according to their report on learnings (C70, C126; CCINL, 2019c), was discovering that communication campaigns can be a useful tool to reach broader audiences by innovating and tailoring the messages to the local context. Along with artistic interventions, were successful in communicating the complex concept of corruption in day-to-day situations (C5, C109, C126; CCINL, 2019f). This approach was novel within USAID's portfolio.

Concerning the stakeholders, the IP unexpectedly realized the potential impact of having educational institutions as allies for this and future activities (C103, C109). As for the workshops, the CCINL team learned to facilitate the workshop in-situ to have more companies and workers trained, and they might have differentiated content for recurring CSOs or companies (C8, C44, C109).

Some lessons learned from the Normalizómetro demonstrate that younger people are more receptive than seniors when identifying daily corruption, as well as higher education causes a better identification of corrupt acts. A second lesson is that measuring beliefs rather than perception was more useful for the

activity. In the end, this statistical tool showed positive impact results, as another unexpected change (C103; CCINL, 2019f).

The branding strategy consisted of creating an SHH identity on their own and not using the CCINL as a brand. As a result, the campaign achieved 67 mentions in local media and 32,174 visits to the website and presented the activity in three states—Baja California, Tabasco, and Sonora (CCINL, 2019c). The coverage of the campaign in the media was positive. It was disseminated by all allies and even outlets that did not have a good relationship with the CCINL (C15, C70).

### *Sustainability*

From its inception, the SHH activity included a sustainability plan, considering Hagámoslo Bien as the main ally to lead the efforts given their proven capacities, along with *Incorruptible* and *Coalición Anticorrupción*. They have committed themselves to carry out specific actions to foster the campaign's effects. The activities of the first two institutions are at a high level of ownership that involves public commitments and collaborative actions with local stakeholders (CSOs, universities, and businesses).

At the end of the evaluation period, *Incorruptible* keeps working with the Specialized Anti-corruption Prosecution Office to channel reports of possible cases of corruption. *Coalición Anticorrupción* is monitoring the implementation of the commitments signed by the elected candidates during the campaign and is also supporting local anti-corruption systems to enhance cooperation mechanisms with municipalities. Finally, Hagámoslo Bien continues working with enterprises that participated in the activity through the *Bien en Tu Empresa* program that aims at strengthening a culture of compliance in businesses (CCINL, 2019f).

### **Conclusions**

The activity's successful implementation is explained by a combination of elements, starting with the overarching implementing partner capacity to mobilize an extensive network of stakeholders because of their convening authority and reputation preceding transparency efforts. The main factor explaining the success that stands out is the private sector involvement with renowned companies such as Axtel, Home Depot, and Promax, among others.

Along with demonstrated flexibility shown by CCINL from the beginning toward adapting the activity to external changes such as SNA emergence, the second characteristic for success consisted of involving stakeholders following the design phase and keeping them engaged along the implementation process by using tools such as co-creation (successful) and co-financing (partially successful). In addition, dynamics in public spaces focused on getting citizens insights on daily corruption practices that resulted in well-suited activities according to context characteristics.

A first innovation detected was pursuing a different target group than the usual institutional actors; SHH went for regular citizens with an appealing and fresh take on corruption and honesty instead of the regular punitive approach prevailing across anti-corruption initiatives. Another novelty was using artistic vehicles to generate behavioral changes within metropolitan municipalities with higher education and income levels than the average in Mexico. In contrast, with other activities evaluated, SHH created a baseline according to the necessities to evaluate the behavioral changes (before and after).

Finally, as an unexpected outcome, SHH resulted in a good practice example referring to external pressure mechanisms beyond their target audience by creating longstanding alliances with local actors to get and follow up on significant anti-corruption commitments from candidates and institutions alike as well as being effective at building civic–government collaboration spaces.

## ***Public Ethics Consolidation Program – International City Management Association, Mexico and Latin America (ICMA-ML)***

### **Introduction**

The Public Ethics Consolidation program aims to promote an enabling environment for ethical behavior among public officials. The final goal of this intervention is to contribute to improving citizens' trust in public institutions and their employees (ICMA-ML, 2017b). The activity was predominantly implemented—with the engagement of local CSOs—on public institutions of the following northern states of Mexico: Chihuahua, Coahuila, and Nuevo León. USAID is investing \$1.65 million in this program. The activity started in September 2017 and is expected to finish in September 2020.

### **Background**

Since the creation of the National Anti-corruption System (SNA) in 2016, through constitutional reform and the enactment or modification of seven regulations, significant anti-corruption initiatives have been launched in Mexican institutions. The Administrative Responsibilities Act is one of the enacted regulations. This law highlights the importance of promoting ethical behavior among public officials in two perspectives: firstly, at the organizational level, by directing public institutions to create and implement codes of ethics and integrity programs, and also at the individual level, by establishing the obligation of public officials to comply with the mentioned codes and programs. In this context, the International City Management Association, Mexico and Latin America (ICMA-ML) launched the Public Ethics Consolidation program—seen as complementary to USAID's national anti-corruption strategy.

**Table 39. Public Ethics Consolidation Program Stakeholder Mapping**

| Name                                                                                                                                                                                               | Role                                                                                                                                                                             |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Instituto Tecnológico y de Estudios Superiores de Occidente (ITESO)                                                                                                                                | Subcontractor. Formulates the ethical cases to be used in the Ethical Decision Exercises System (SEDE) and Anonymous Help System for Questions and Complaints (SAADD) platforms. |
| Locallis                                                                                                                                                                                           | Subcontractor. They develop the Citizen Index for Institutional Public Ethics Strengthening (ICIFIEP) tool. They train CSOs about the intervention tools.                        |
| Counterparts in Chihuahua:<br><br>Desarrollo Integral de la Familia (DIF Chihuahua),<br>Comisión Estatal de Derechos Humanos (CEDH Chihuahua),<br>Secretaría de la Función Pública (MPA Chihuahua) | They are the major counterparts in the territories of implementation. DIF served as a pilot, while CEDH Chihuahua and MPA Chihuahua recently joined the intervention.            |
| CSOs in Chihuahua:<br><br>Red por la Participación Ciudadana                                                                                                                                       | Subcontractor. They apply the ICIFIEP tool. Also, they oversee the intervention implementation. Training of other CSOs for the use of the intervention tools.                    |
| Counterparts in Coahuila:<br><br>Auditoría Superior del Estado de Coahuila (ASEC)                                                                                                                  | The ASEC is the major counterpart, serving as a pilot institution.                                                                                                               |
| CSOs in Coahuila:<br><br>Ciudadanos Construyendo un Mejor Gobierno,<br>and Consejo Cívico de las Instituciones de Coahuila                                                                         | Subcontractor. They apply the ICIFIEP tool. Also, they oversee the intervention implementation and training other CSOs on use of the intervention tools.                         |
| Counterparts in Nuevo León:<br><br>Escobedo Municipality, San Nicolás Garza Municipality, San Pedro Garza Municipality                                                                             | They are the major counterparts in the territories of implementation. These public entities recently joined the intervention.                                                    |
| CSOs in Nuevo León: None                                                                                                                                                                           | No local CSO has been involved as a subcontractor.                                                                                                                               |
| Teorema                                                                                                                                                                                            | Subcontractor. Graphic design and digital marketing of the intervention.                                                                                                         |

## Description of the Activity

The Public Ethics Consolidation activity (PEC) is a three-year program that aims to help public institutions develop and implement codes of ethics and codes of conduct as part of an integrated system to promote adequate behaviors among public servants (ICMA-ML, 2018a). The anti-corruption perspective of ICMA-ML focuses on a long-term strategy of changing public officials' conduct, motivating their interest in integrity, and developing ethical competencies to perform their duties adequately. The ultimate goal of the activity is to improve the citizens' trust in public institutions and the individuals that work for them (ICMA-ML, 2017b).

## Objectives and Components

Ethical institutional environment: this intervention refers to an auto-evaluation tool for public entities called "Citizen Index for Institutional Public Ethics Strengthening" (ICIFIEP). The component aims at various goals: to enhance the knowledge needed to design the intervention's interventions at each public institution, to increase the number of cases included in the Ethical Decision Exercises System (SEDE) platform, to provide diagnostic information on the state of the ethical environment of the participant institutions, to measure the level of compliance of participating entities with the ICIFIEP, and to support the development or improvement of codes of ethics and conduct in those institutions (ICMA-ML, 2017b). Intervention activities include the following:

- Design and implementation of the Ethical Decision Exercises System (SEDE): The objectives of this component include measuring variations in the use of SEDE among public officials and their achievement in the understanding of public ethics (ICMA-ML, 2017b).
- Design and implementation of the Anonymous Help System for Questions and Complaints: this component involves the report of inadequate behaviors or corruption cases (SAADD) (ICMA-ML, 2017b).
- Besides the complicated logical path in which components and objectives are presented, the indicators and results measurement are clear; they quantify the results for the three tools: ICIFIEP, SEDE, and SAADD (the names of the tools vary throughout the provided documentation). To check the indicators and life of activity targets, check the benchmark meet table.

## Theory of Change Evaluation

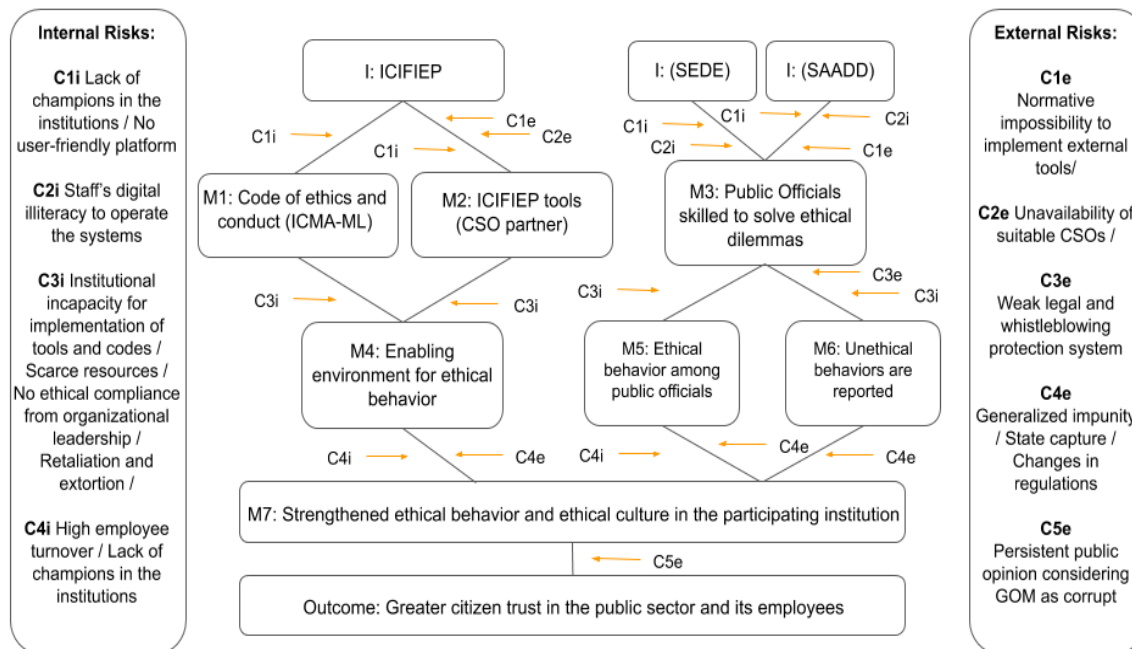
*Theory of Change:* The documentation provided no theory of change. The evaluation team has articulated one theory of change for each of the activity's three interventions, based on the available documentation and reports, and from the interviews that the team conducted. The reconstructed theory of change is as follows:

*"Through a collaborative and co-learning process between public institutions and civil society organizations, an environment for ethical behavior is enabled and public officials will be encouraged to act with integrity, preventing corruption and generating greater citizen trust in the public sector and its employees."*

## Theory of Change Analysis

The main identifiable components are I: Intervention, M: Mechanism, and O: Outcome, which were taken from the activities' documentation, and the translation was made by the evaluation team. Context factors, which represent internal and external risks and appear on the sides, were developed by the evaluation team to analyze potential factors that could affect the Theory of Change, shown in Figure 15.

**Figure 16. ICMA Theory of Change**  
**Theory of Change - ICMA-ML**



Main elements affecting this Theory of Change

- Suitable CSOs to implement the intervention in the regions are not available.
- Organizational leadership is not ethically compliant, which includes sharing with public servants what to expect after the implementation of the intervention.
- The staff has insufficient digital literacy to implement the intervention.
- Public officials insufficiently use digital platforms as SEDE and SAAD.
- There is no presence or lack of champions in the institutions.
- Institutions do not have the technical capacity to operate the intervention.
- Impunity has been generalized.
- There is persistent public opinion considering GOM as corrupt, despite efforts for transparency and accountability.

## Design Analysis

### *Anti-Corruption Approach*

The activity merges an institutional approach and a cultural one. Besides the intervention on formal institutions (e.g., implementation of a code of ethics and a code of conduct), the activity seeks to impact the organizational culture and, therefore, to achieve behavioral changes among the staff; no economic or legal incentives are used for this purpose.

### *Alignment to USAID's Development Objective and Intermediate Results*

This alignment evaluation only considers those related to integrity and transparency (DO 3, IR 3.3), not others of the CDCS 2014–2018. The indicators created for measuring the performance of the intervention have an indirect relation with Sub-IRs 3.3.1 (Non-governmental actor's capacity to advocate and demand implementation of anti-corruption reforms developed), and 3.3.2.4 (Key GOM and private sector entities operate with fewer conflict of interest). The fulfillment of the life of activity targets does not guarantee a direct impact on the Sub-IRs because there could be several intervening factors that are not in control of the activity. The activity directly contributes to IR 3.3 with activities performed under the Sub-IRs mentioned above. The former is mainly expressed in two ways: first, there is a clear strategy to engage local CSOs with public institutions in the regions where they operate, through the instrumentation of the ICIFIEP tool. And second, ethical behavior among public officials is promoted through the SEDE and SAADD tools—one of the expected results is to reduce favoritism during the performance of the institution's processes. When the components of the activity involve auditing institutions (such as the ASEC in Coahuila or MPA in Chihuahua, which are counterparts in this program), the contribution also includes Sub-IR 3.3.2.3, (Increased Professionalism and Impartiality in GOM Audit Functions). However, ICMA does not state the activity contributes to this Sub-IR in the provided documents. In general terms, accountability and transparency are strengthened through the ethical performance of public officials. There is no alignment with Sub-IR 3.3.1.2 (Citizen oversight of procurement enabled by new monitoring mechanisms and data platforms), Sub-IR 3.3.1.3 (Independent media capacity to investigate and analyze potential corrupt acts is developed), or Sub-IR 3.3.2.1 (SNA institutions have the technical capacity to fulfill legally-mandated responsibilities).

### *Alignment to USAID's Local Systems Framework*

From the analysis of each principle comprehended in the Local Systems Framework approach, the evaluation team determined that the activity is mostly aligned with this framework. The activity satisfies eight of the ten principles. The two exceptions are holistic design and Monitoring and Evaluation strengthening sustainability. In the first case, even though the collaboration between the local CSOs and the participant institutions is part of the intervention's design, there is no mechanism to stimulate the interaction among all the participating CSOs and institutions involved in the system; therefore, there is not a holistic understanding of the local systems' framework. In the second, the indicators included in the monitoring and evaluation tools do not assess progress of the local system toward sustainability.

### *Local Systems Framework 5Rs*

- **Results:** This local system focuses on changing public officials' behavior and motivating their interest on integrity and its use in their duties, with the goal of improving the citizens' trust in the institutions and the individuals working for them (ICMA-ML, 2017b).
- **Roles:** (1) ICMA, as the implementing partner, coordinates the generation of resources by ITESO and Locallis; it encourages public entities to join the intervention, and it identifies CSOs to partner with. (2) CSOs apply the ICIFIEP and provide feedback to the counterpart for improvement. (3) Counterpart's leadership encourages public officials to engage with the

intervention tools (SEDE and SAADD), and considers the recommendations for improvement provided by CSOs or ICMA.

- **Relationships:** Most relationships are formal, except for ICMA's approach to invite potential counterparts to join the intervention, which is based on informal relations. (1) ICMA establishes relationships with all the actors involved in the intervention. (2) Locallis engages with ICMA and local CSOs (mainly for training in the use of ICIFIEP). (3) ITESO interacts with one actor only (ICMA); the interaction focuses on the development of ethical cases to be used in the SEDE platform. (4) CSOs engage with ICMA as the coordinator of the intervention and with counterparts when applying the ICIFIEP. (5) Counterparts engage with ICMA as the implementing partner (mostly with SEDE, SAADD, and code of ethics and conduct), and with CSOs that apply the ICIFIEP.
- **Rules:** Formal rules, such as the SNA regulations, are relevant for the activity. The actors involved in the local system cannot modify the laws because they were passed at the national level. Through the implementation of ICIFIEP, SEDE, and SAADD, the activity seeks to make part of the SNA regulations on ethics operative.
- **Resources:** Budget provided by the donor (USAID), the implementing partner's expertise on ethics (ICMA), software development capacity to build SEDE and SAADD (ICMA), academic perspective (ITESO), and knowledge of local networks (CSOs).

## **Implementation Review**

### *Component 1. Ethical Institutional Environment*

The number of institutions involved in the PEC program (eight) exceeds the target set in the cooperation agreement (six by phase three), which represents an achievement of 133 percent of the original goal (C26; ICMA-ML, 2017a). The indicator Average participation of the Experts Group members in meetings attendance of the members of the group of experts, who evaluates the performance of the intervention, reached 83 percent in the first quarter of 2019, which surpasses the target of 75 percent for the year (ICMA-2019c).

One additional indicator refers to changes in the ICIFIEP's score of the participating institutions. As of October 2019, four CSOs have been participating in the application of such a tool. However, only one evaluation round is complete; therefore, it is not possible to track the evolution of this indicator yet. In the first evaluation, ASEC obtained 7.06 percent of the possible score and DIF 84.44 percent. At the moment, the ICIFIEP is being measured in three out of eight counterparts (C26), with the processing of the results for the MPA Chihuahua pending. Additionally, ICMA supported the development or update of codes of ethics in two participating entities, ASEC and San Nicolas Garza municipality (C99; C117; San Nicolás de los Garza, 2019).

### *Components 2 and 3. Individual Ethical Behavior*

The activity included developing the SEDE tool and implementing it with users from the pilot institutions and other institutions, including the Ministry of Public Administration Chihuahua, the State Commission on Human Rights Chihuahua, and the municipalities of General Escobedo, San Nicolás de los Garza, San Pedro Garza García, and The Comptroller Office of Jalisco (which is beyond the regional scope of this evaluation). By mid-2019, the intervention has added 97 cases to SEDE, and the target for year 2019 is reaching 150. Therefore, the goal is likely to be achieved.

However, it is important to point out the decrease in the usage of the SEDE platform. After one year of implementation in the two pilot entities, the use of the SEDE platform varies considerably, which makes it difficult to assess the tool. In the ASEC, the use of SEDE has been stable, with an annual increase of 4.48 percent (ICMA-ML, 2018c; ICMA-ML, 2019a). In contrast, it decreased by 28.32 percent in the DIF Chihuahua in the same period (ICMA-ML, 2018b; ICMA-ML, 2019b). Based on the interviews, the evaluation team noticed some elements related to activity management that can explain these negative outputs. On the one hand, informants reported a personal conflict between ICMA's leadership and the contact points at DIF Chihuahua (C60, C96). There is no version of this matter by ICMA's staff, but, considering the emphasis on this subject by DIF's team, this problem has been relevant to the implementation in the mentioned institution. On the other hand, the evaluation team also noticed misunderstandings by DIF's staff related to the deliverables of the intervention. According to DIF's contact points, the implementation of a tool like SAADD was not in the original plan (C60, C96, C147). However, even when the cooperation agreement does not mention the SAADD by name, there is a tool described as "a proposal to establish a structure for the anonymous attention of doubts about ethical decisions from public servants related to ethics" (ICMA-ML, 2018d). In this sense, apparently ICMA was not clear enough when explaining all the elements of the intervention to be implemented.

An additional example of activity management problems is ITESO's staff, developers of SEDE's exercises, who reported unawareness of SEDE's effects on public officials (C140). It is difficult to know how ITESO's team improves these exercises without information about SEDE's impact on public officials. It seems ICMA does not provide this critical information to ITESO's staff. In addition, public officials reported some tedium about using the SEDE platform, which can negatively impact SADE's use

too. The participants provided this information in the assessment workshops performed in ASEC on August 30, 2019, and in DIF Chihuahua on September 2, 2019.

**Table 40. Usage of SEDE Platform**

| Institution   | First Round | Fourth Round | Variation |
|---------------|-------------|--------------|-----------|
| ASEC          | 223         | 233          | +4.48%    |
| DIF Chihuahua | 399         | 286          | -28.32%   |
| Total         | 622         | 519          | -16.56%   |

Sources: ICMA-ML, 2018b; ICMA-ML, 2018c; ICMA-ML, 2019a; ICMA-ML, 2019b.

Another indicator refers to the percentage of public servants that accomplished a better understanding of public ethics, which consists of comparing the answer provided by the public official with the correct answer in the ethical exercises of the SEDE platform, and then calculating the percentage of correct answers in all questions (ICMA-ML, 2017b). However, it is not methodologically correct to compare responses on this understanding of public ethics between different SEDE's cycles because it is not tracking the answers of the same public official. The monitoring and evaluation disaggregate data of those responses by age, gender, and other elements. These numbers are hardly comparable.

Regarding the SAADD platform, only six queries have been reported. From those, only one has completed the questions and answers cycle. In the workshops performed in pilot institutions, the evaluation team found that most public officials did not know about the existence of this tool. One of the contact points in DIF Chihuahua said they do not use the SAADD at all (C147). As it can be appreciated, results on the use of the intervention's main tools do not allow us to assess the effectiveness of the implementation at this stage, based on the reported indicators. Nevertheless, the information collected from the interviews and workshops enabled the team to point out that there are significant changes. For details of this information, refer to the Main Findings section.

**Table 41. Public Ethics Consolidation Program Planned vs. Executed Activities**

| Component 1 – Ethical Institutional Environment                                                   |           |         |         |          |
|---------------------------------------------------------------------------------------------------|-----------|---------|---------|----------|
| Planned Activities                                                                                | Completed | Ongoing | Dropped | Comments |
| Creation and operation of the Expert Group to review the Public Ethics Consolidation model.       |           | X       |         |          |
| Design and implementation of the ICIFIEP in two pilot entities and up to four public institutions |           | X       |         |          |
| Components 2 and 3 – Individual Ethical Behavior                                                  |           |         |         |          |
| Planned Activities                                                                                | Completed | Ongoing | Dropped | Comments |
| Design and implementation of the SEDE                                                             |           | X       |         |          |
| Design and implementation of the SAADD                                                            |           | X       |         |          |

*Benchmark*

Data is gathered from the most recent report of the activity (ICMA–ML, 2019c).

**Table 42. Public Ethics Consolidation Program Indicators**

| Component 1 – Ethical Institutional Environment                                                                                                     |             |               |                         |                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------------|---------------|-------------------------|---------------------------|
| Indicator                                                                                                                                           | 2019 Target | 2019 Actual   | Life of Activity Target | Life of Activity Progress |
| Average participation of the Experts Group members in meetings                                                                                      | 75%         | 83% (Q1 2019) | 75%                     | --                        |
| Accumulated number of cases added to the SEDE                                                                                                       | 150         | 97 (Q2 2019)  | 300                     | 97 (32%)                  |
| Average ICIFIEP advancement of public entities to comply with the SAE, and its relevant guidelines that truly advance in the anti-corruption agenda | 35%         | 46% (Q1 2019) | 45%                     | --                        |
| Percentage of public entities (scheduled and voluntary) that will continue implementing the                                                         | --          | --            | 60%                     | --                        |

| Component 1 – Ethical Institutional Environment                                                                                                                 |                                    |             |                         |                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|-------------|-------------------------|---------------------------|
| Indicator                                                                                                                                                       | 2019 Target                        | 2019 Actual | Life of Activity Target | Life of Activity Progress |
| model or any of its tools at the end of the PEC Program                                                                                                         |                                    |             |                         |                           |
| Percentage variation of CSOs applying the ICIFIEP *                                                                                                             | --                                 | --          | 20% to 100%             | --                        |
| Component 2 and Component 3 – Individual Ethical Behavior                                                                                                       |                                    |             |                         |                           |
| Indicator                                                                                                                                                       | 2019 Target                        | 2019 Actual | Life of Activity Target | Life of Activity Progress |
| Percentage variation of public servants using the ethics decision-making tool (SEDE)                                                                            | -4.24% (Q3 2019)<br>-17% (Q1 2019) |             | 5%                      |                           |
| Percentage of public servants that accomplished a better understanding of public ethics                                                                         | 64% (Q3 2019)<br>70% in Q1 2019    | 40%         | 50%                     | --                        |
| Percentage variation of complaints of misbehavior or corruption acts committed by public servants in the public entities applying the Model or any of its tools | --                                 | 10%         | 10%                     | --                        |
| Institutions involved in the PEC program.                                                                                                                       | --                                 | --          | 6                       | 8 (133%)                  |

\*Added in the 1st Quarterly Report 2018 but dropped by the 2nd Quarterly Report 2019. Target (when presented) ranges from 25 percent to 100 percent. The drop matches the period when two CSOs started their roles as subcontractors, May and June 2019.

## Main findings

### Results

In general terms, on one hand, ICMA's interventions were effective in building civic-government relations. They resulted in CSOs adopting a collaborative strategy that has facilitated their engagement with the Government of Mexico (GOM) entities. Key informants reported that the Public Ethics Consolidation (PEC) intervention led them to change their approach to combatting corruption, from a punitive and confrontational one to a preventive approach (C13, C33, C88). ICMA's activity also

supports CSO efforts to determine if public institutions have implemented tools and procedures that foster an ethical environment and to provide recommendations for improvement (C3, C13, C26; ICMA-ML, 2017b).

As of October 2019, five CSOs are involved in the intervention and three are conducting evaluations using a collaborative strategy that facilitates their engagement, instead of a contentious approach (C13, C60, C88). Examples of this collaboration are Locallis, a local CSO working with the Superior Audit of Coahuila State (ASEC), and the Red para la Participación Ciudadana de Chihuahua, which is collaborating with the Chihuahua Family Development Agency (DIF Chihuahua). Members of participating CSOs considered the most significant change to be that they learned more anti-corruption strategies and even received requests from local enterprises to develop codes of ethics (C13, C33, C140).

The intervention was only partially effective in terms of the use of tools and platforms. In the case of ICMA's Public Ethics Consolidation program (PEC), despite reporting individual behavioral changes, the use of the PEC's ethics training tool (Ethical Decision Exercises System, SEDE) varies significantly among institutions. After one year of implementation, use increased by 4.48 percent in the *Auditoría Superior del Estado de Coahuila* (ASEC) (ICMA-ML, 2018c; ICMA-ML, 2019a) but decreased by 28.32 percent in DIF Chihuahua (ICMA-ML, 2018b; ICMA-ML, 2019b).

Informants reported changes in staff awareness of improper behaviors (C16, C147, C181) and a higher level of compliance with norms regulating the use of institutional resources (C99, C160). However, public officials participating in the evaluation workshops consider that the changes are still on an individual scale, not at the institutional level, and are not yet really significant (Evaluation workshops on August 30, 2019, and September 02, 2019). Moreover, the platform for filing claims and posting questions (Anonymous Help System for Questions and Complaints, SAADD) has barely been used (C26, C147). Informants stated there were misunderstandings on the cooperation agreement and scope of work regarding the implementation of the SAADD tool, which DIF-Chihuahua argued was not in the original plan (C60, C96, C147).

#### Most Significant Change in Knowledge

- Capacity development: Members of participating CSOs considered as the most significant change the capacity development on ethics that enhanced their capabilities on such a topic. For example, an informant (C13) admitted that ethics is a new anti-corruption perspective for them, which also makes them consider the internal processes of the counterpart when implementing a program. Another informant (C33) reported that after they acquired this knowledge on ethics from ICMA, they received requests from local companies to help in the development of codes of ethics. These achievements, from awareness on ethics to service requests, are consequences of the knowledge transfer from ICMA. The following affirmation by the same interviewee (C33) illustrates those changes from this capacity development: "The ICMA activity strengthened us; even if we do not continue working with ICMA, we will keep working on this topic (ethics)."

#### Most Significant Change in Relations

- Changes in the GOM-CSO dynamic: Instead of pressuring public entities for changes, the PEC program proposes a dynamic based on collaboration. The partnering CSO offers to the GOM entity the tools of the PEC program, and the commitment of not involving the media. This approach, according to C88, "makes the institution to see us not as enemies; instead, they realize we have work to do together." Another informant from civil society (C13) explained that "our role is to provide feedback, not to pressure" the GOM institutions. From the counterparts' perspective, a public official assured us that ICMA's evaluation was biased (IFICIEP). However, a local CSO substituted ICMA's evaluating role. According to an informant (C60), this CSO has

an equilibrated perspective, which since then has been facilitating the implementation of the intervention. This joint work with CSOs is useful, “as long as the evaluation is balanced,” this informant said.

### Most Significant Change in Norms

- Improvement of code of ethics and its use: Public officials from three different institutions highly value the support of ICMA in the update of their code of ethics (C99, C102, C146). One of the key informants (C99) pointed out that ICMA provided a methodology that goes beyond the code of ethics itself since it includes the PEC program, which allows reaching nearly all of the employees of the institution. The same key informant reported that his organization is now using the code of ethics as part of the hiring process for new staff, asking candidates if they agree with the code’s contents. In another organization, the codes of ethics and conduct have been distributed to all public officials to ensure the majority of the staff knows them (C146). Other examples of norms are the development or update of codes of ethics in two counterparts as the ASEC and San Nicolas Garza municipality (C99, C117; San Nicolas de los Garza, 2019).

### Changes in Individual Behavior

Public officials reported some changes in their behavior. They reported these in workshops performed by the evaluation team in both pilot institutions. However, when asked to vote, participants did not agree that these were widespread or significant enough. The following changes were mentioned:

- Compliance with rules regarding the use of per diems: A key informant (C99) explained that some public officials have to travel long distances and stay for weeks in remote locations to work with other public officials. For those activities, the personnel received per diem allowances. Before the PEC program, public officials spent those resources on goods that were unrelated to their duties, like cigarettes. Also, they had their meals at establishments where alcohol is commonly consumed, which made it difficult to determine if they had purchased alcoholic beverages. The PEC program contributed to change this behavior through the SEDE exercises and by motivating the institution to create guidelines regarding the use of the per diem. The reported result is the use of the per diem resources according to the guidelines. This represents a relevant change for the organization since the per diem expenses are an important part of their budget.
- Reduction of favoritism: A public official (C147) detailed that before the PEC program, when suppliers offered gifts to the staff in the procurement area, civil servants accepted them. However, after the implementation of the intervention, the offerings are refused. And, when small gifts are received (a box of chocolates, for example), the receiving public official distributes them among his or her peers, seeking to avoid having others think he or she took them for personal benefit. In the same line, staff from a procurement department reported that they are more aware of good practices of the client–supplier relationship, and that they try to avoid favoritism (participants in the workshops). These members from the procurement department also accept that this awareness involves additional effort; in the workshop conducted at the DIF Chihuahua, it was said that “even when it increases the workload, we look for new and better options (providers)” (C#). They express being motivated to apply what they have learned on ethics in their procurement praxis.
- Conscious use of public resources: A change in the use of public resources was also frequently reported among the pilot institutions: “There is a greater awareness in the use of the resources; a better resources management is evident. Vehicles are used more responsibly” (C181); “I do believe that people who misused the resources have modified their practices” (C16); and “There is more awareness among coworkers regarding the use of resources” (C160).

**Table 43. Public Ethics Consolidation Program Factors Affecting the Activity**

| Internal                                                                                                                                                                    | External                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| ✓ Consistent methodology and indicators                                                                                                                                     | ✗ Finding CSOs willing to work with the intervention |
| ✓ CSOs–public entity engagement                                                                                                                                             |                                                      |
| ✓ Internal champions                                                                                                                                                        |                                                      |
| ✗ No clear path after public officials finish the SEDE cycles                                                                                                               |                                                      |
| ✗ ICMA’s activities management and relations with counterparts                                                                                                              |                                                      |
| ✗ Theory of change that makes too far-fetched causal chains and insufficient evidence of contribution (i.e., improvement of the public’s trust in participant institutions) |                                                      |

Three internal factors facilitated the implementation of the activity, after more than two years of implementation in the pilot entities. First, since the beginning, the component’s designs have been kept unaltered, making it possible to monitor progress (ICMA-ML, 2017b; ICMA-ML, 2019c). However, and precisely about this, the indicator *Percent of public servants who have a better understanding of public ethics* needs an independent revision regarding the level of difficulty of the exercises. Second, it has a collaborative approach that facilitates the engagement between CSOs and public entities (C13, C60, C88). Finally, in participating institutions, internal champions showed their commitment to continue with the activity (C10, C19, C68, C76, C96, C99, C102).

However, there are three internal constraints. First, the theory of change of the activity aims at the ambitious outcome of greater citizen trust while lacking sufficient evidence of the activity’s contribution to this end. Second, there is no clear path to follow after public officials finish the SEDE cycles. The third internal constraint is ICMA’s activity management. For example, the relationship between ICMA’s leadership and the counterparts that may affect the use of the activity’s tools, as mentioned in the Implementation Review section. Similarly, the lack of clarity from ICMA to the participating CSOs regarding reports is another example of this issue. One member of these organizations said they were requested to expand a report from five to 20 pages (C88). And another mentioned they spent more time reporting than actually performing activities (C33). Another example is ITESO’s staff, developers of SEDE’s exercises, who reported unawareness about SEDE’s effects on public officials (C140). This lack of awareness makes it difficult to know how ITESO’s staff improved exercises without feedback.

An external constraint is the lack of CSOs that are able to engage in the activity because these actors usually have a punitive agenda, not a preventive one. Thus, CSOs with insufficient capacities is another factor that makes it challenging to find suitable local partners (C3, C26, C88).

## *Lessons Learned*

The lessons learned at this point in the implementation vary among actors. For the IP and the CSOs, the lessons rely mainly on operative issues; for the counterpart, the lessons rely on the advantages offered by the intervention's tools.

The IP's staff considers it crucial to have a local partner that acts as a third party to put pressure on the participant entities to fulfill their commitments (C3, C26). However, it has been difficult to find capable organizations to partner with, since they usually hold a punitive anti-corruption approach, and not a preventive one (C3, C26). Also, ICMA's staff has internalized the necessity to train local CSOs to make them more effective when applying the PEC's tools (C3, C26, C57).

On the counterpart's side, a top public official reported they, as an organization, have learned about the necessity of communicating the goals of the activity and creating mechanisms to know about the expectations of participants. If not, public officials will generate unnecessary resistance to the implementation (C102). Additionally, different counterparts have understood that they can use ethical tools in different organizational processes, such as personnel recruitment (C9, C96, C99, C102).

## *Sustainability*

The sustainability of the capacity development interventions depends on the component analyzed. In the case of the ICIFIEP, as CSOs received training for its application on their own, the tool could continue without ICMA's intervention. However, regarding SEDE and SAADD, the presence of ICMA seems mandatory because the implementing partner holds the management of these tools. From a broader perspective, in the view of different informants, the activity is owned by local CSOs who show commitment to the collaborative strategy and the preventive approach of PEC (C13, C33, C88).

Also, the top management of the counterparts has demonstrated their commitment to continue with the activity (C10, C19, C68, C76, C96, C99, C102). For example, C99 said that after this pilot finishes in the institution he leads, the organization will present the PEC program results to the State Anti-corruption System. "This is the training we have, and we can support other organizations with this knowledge. By the third year, we will look for replicability of this program in partnership with ASOFIS (the National Association of Supreme Audit and Government Control Agencies)." It was not clear enough from his statement whether they expect the economic support of USAID when looking for that replicability. In another case, it was evident. C96 said their institution is very interested in continuing with the intervention, but they lack the resources to carry on with it on their own. This willingness to continue with the intervention, such as those mentioned by CSOs and counterparts, enhances sustainability chances.

Considering the findings in the pilot institutions, the statistics of the SEDE platform, and the analysis of the interviews, it is more likely that the activity will be sustainable in the ASEC than in the DIF Chihuahua.

Regarding replicability, a problem is that the activity does not seem to be cost-effective, since it is receiving \$1.65 million, and the SEDE platform barely reached 2,359 users. Even when SEDE is not the only intervention of the activity, it is a core tool of it. The calculation, of course, is more complicated than dividing the funds by the number of users. But, for example, the ASEC reported that their online training programs had a cost of 1.8 MXN/Hour/User or 0.093 USD/Hour/User (C117), which is notably lower than ICMA's intervention. In this sense, and to expand the range of public officials engaged, USAID should consider other online teaching platforms such as Massive Open Online Courses (MOOC) that operate at lower costs and serve the same purpose.

## Conclusions

ICMA executed all of the planned activities like the design and implementation of the ICIFIEP, SEDE, and SAADD tools. They also provided technical support in the creation or update of codes of ethics and codes of conduct. However, the results of these activities vary, as explained in the implementation review section.

The main problems relate to activity management issues. ICMA has shown deficiencies in managing the expectations and day-to-day relations with the participant institutions. Examples of this are misunderstandings with one counterpart, lack of clarity with CSOs regarding reports, and no provision of feedback to the designer of SEDE's exercises.

Another internal problem of this program is a theory of change aiming to improve citizens' trust in participating public entities. The causal chain is too long and the activity is not able to demonstrate the contributions that it makes to this end. Therefore, there is a lack of adequacy at the higher level of goals and in the indicators used to report progress.

### *Summary of the main external factors affecting the evaluated activities*

Each activity evaluated in this study faced particular conditions and challenges (details are presented in each case study, Annex V). In this table, the ICME team summarizes the external factors that may have affected the activities under evaluation. This refers only to those aspects that were similar across the set of cases analyzed, because they can be of interest for future endeavors. The main external enabling factors appear with a check mark, and the main external obstacles or challenges with a cross.

**Table 44. Main External Factors Affecting USAID-Supported Activities**

| <b>EXTERNAL FACTORS AFFECTING USAID’S ACTIVITIES<sup>25</sup></b>                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>TRRP</b>                                                                                                                                                                                                                                                                                                                                                                                               | <b>WORLD BANK</b>                                                                                                                                                                                                                                                                                                                                                                                 |
| <ul style="list-style-type: none"> <li>✓ Sense of urgency in the states to give results</li> <li>✓ Openness, high need for assistance and weak institutional infrastructure at the local level</li> <li>✓ The existence of a champion</li> <li>X Lack of trust: reluctance from some actors to work with the project (CPC at first, CSOs Mexico City and Nuevo León, some sectors in Coahuila)</li> </ul> | <ul style="list-style-type: none"> <li>✓ Champions within the leadership (mostly in C1, except for Social Accountability Process)</li> <li>X The new head of MPA changing priorities</li> <li>X Lack of ownership by key authorities within the MPA (Social Accountability Process)</li> <li>X Lack of political will (Social Accountability Platform and Financial Disclosure Format)</li> </ul> |
| <b>UNDP</b>                                                                                                                                                                                                                                                                                                                                                                                               | <b>MEPP</b>                                                                                                                                                                                                                                                                                                                                                                                       |
| <ul style="list-style-type: none"> <li>✓ UNDP’s convening authority – Components 1 &amp; 2</li> <li>✓ SMEs’ limited knowledge of anti-corruption, integrity, and transparency issues – Component 2</li> <li>X LTS local conditions (mainly political) – Component 1</li> </ul>                                                                                                                            | <ul style="list-style-type: none"> <li>✓ National Law on Regulatory Improvement being firmly pushed by CONAMER</li> <li>✓ Availability of public information from official sources</li> <li>X A new federal administration entered office just after most activities concluded, affecting their potential sustainability</li> </ul>                                                               |
| <b>IMCO – MAPPING CORRUPTION</b>                                                                                                                                                                                                                                                                                                                                                                          | <b>CCINL</b>                                                                                                                                                                                                                                                                                                                                                                                      |
| <ul style="list-style-type: none"> <li>✓ Anti-corruption agenda momentum boosted by the SNA framework</li> <li>X Rotation of key public officials in Nuevo León and Chihuahua during the implementation process</li> <li>X Lack of consolidated data nor procurement systems</li> <li>X Lack of human–technical capacity in public institutions to digitize documents</li> </ul>                          | <ul style="list-style-type: none"> <li>✓ Active local CSOs on corruption and companies</li> <li>X Politicians running for elections tried to take credit for the SHH campaign</li> </ul>                                                                                                                                                                                                          |
| <b>IMCO – ALLIANCE FOR INTEGRITY</b>                                                                                                                                                                                                                                                                                                                                                                      | <b>ICMA</b>                                                                                                                                                                                                                                                                                                                                                                                       |

<sup>25</sup> Source: Prepared by the evaluation team based on the collected evidence. A check mark means it is an enabling factor and an X is an obstacle or challenge.

## EXTERNAL FACTORS AFFECTING USAID’S ACTIVITIES<sup>25</sup>

|                                                                                                                                                                                                                                                                                   |                                                                                                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>✓ Federal government pressing on the private sector’s role in the corruption</li> <li>X New federal administration entered office two years into the project</li> <li>X Jalisco backed down from the original working agreement</li> </ul> | <ul style="list-style-type: none"> <li>X Finding CSOs willing to work with the intervention</li> </ul> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|

## ANNEX VI: STRUCTURE OF THE NATIONAL ANTICORRUPTION SYSTEM<sup>26</sup>

The National Anticorruption System (NAS) is the result of the participation and commitment of the Mexican State, organized civil society and the country's academic institutions in the fight against corruption. The NAS is an instance of coordination between authorities of the three levels of government and civil society that unite efforts to prevent, detect and punish acts of corruption, as well as to improve the control and exercise of public resources.

The National Anticorruption System is composed of four instances (Art. 7, General Law of the National Anticorruption System), each one integrated by representatives of different entities:

1. The Coordinating Committee of the National Anticorruption System,
2. The Citizen Participation Committee,
3. The Steering Committee of the National Audit System and
4. Local Anticorruption Systems

The function of the Coordinating Committee is to be the body responsible for establishing coordination mechanisms among the members of the National Anticorruption System, as well as for designing, promoting and evaluating public policies to combat corruption. Among the tasks of the Coordinating Committee are: to implement the mechanisms, bases and principles of coordination with the authorities of control, control and prevention of administrative faults and acts of corruption; the establishment of coordination mechanisms with the Local Anticorruption Systems; and participate in the mechanisms of international cooperation to combat corruption, among others.

The Coordinating Committee is made up of seven members (scheme 1):

1. The President of the Coordinating Committee of the National Anticorruption System -which is also the head of the Citizen Participation Committee (CPC)-,
2. The Minister of Public Administration (SFP),
3. The Senior Auditor of the Federation (ASF),
4. The President of the Federal Court of Administrative Justice (TFJA),
5. The President of the National Institute of Transparency, Access to Information and Protection of Personal Data (INAI),
6. The Counselor of the Federal Judiciary (CJF), and
7. The head of the Special Prosecutor's Office for Combating Corruption (FECC)

The Coordinating Committee of the National Anticorruption System has the Executive Secretariat, which serves as a technical support body and is responsible for providing the necessary supplies for the performance of its functions. It is headquartered in Mexico City and has an operational structure to carry out its attributions, objectives, and purposes.

The Citizen Participation Committee aims to link with social and academic organizations related to the matters of the National Anticorruption System. It is composed of five members and some of its main functions consist of giving opinions and making proposals on national politics and integral policies; propose to the Coordinating Committee the projects of coordination bases between the institutions for the control of public resources, the improvement projects to the instruments of the National Digital Platform,

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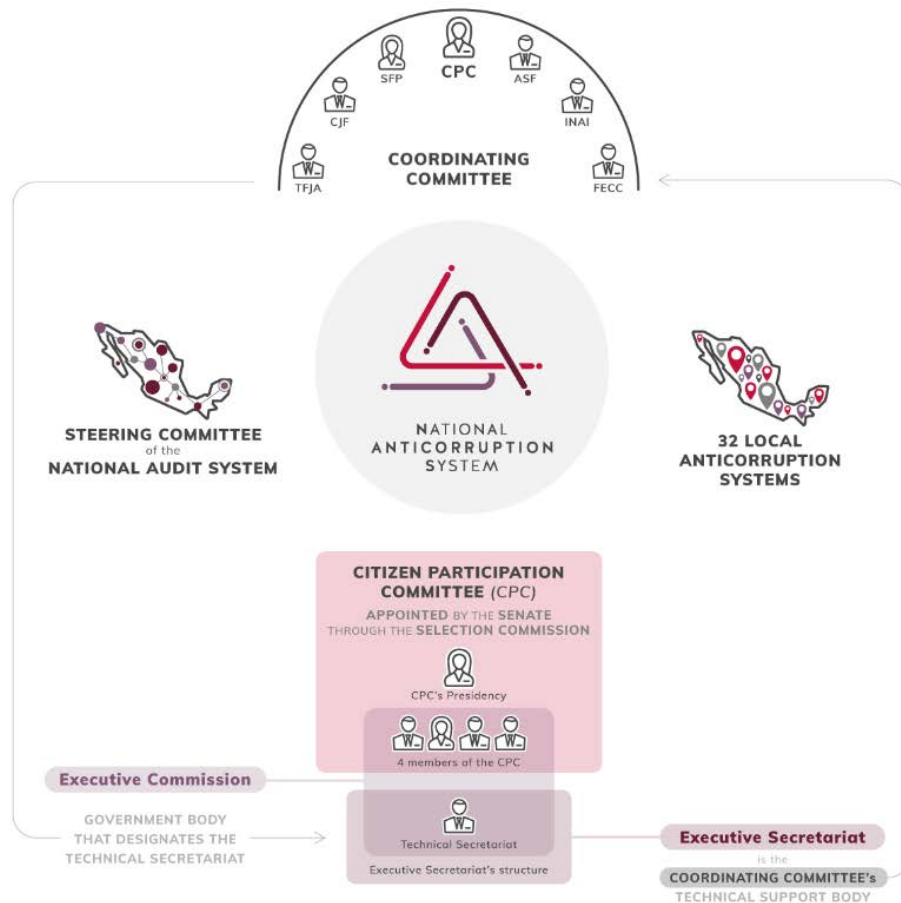
<sup>26</sup> <http://sna.org.mx/en/transparency/#II>

as well as the mechanisms for society to participate in the prevention and reporting of acts of corruption, among others.

The Governing Committee of the National Audit System is made up of the Superior Audit Office of the Federation (ASF), the Ministry of Public Administration (SFP), and seven rotating members from among the local supervisory bodies, and the secretariats or counterparts in charge of the internal control in the states. It is chaired in a dual manner by the Superior Auditor of the Federation and the Ministry of Public Administration, or by the representatives who respectively designate for this position. The Governing Committee is responsible for designing, approving and promoting comprehensive policies on oversight; implement the coordination mechanisms among all members of the System; implement the supply, exchange, systematization and updating mechanisms of the information that in the matter of control and control of public resources generate the competent institutions in the matter.

The Local Anticorruption Systems are established by each federative entity with the purpose of coordinating the competent local authorities in the prevention, detection, investigation, and sanction of administrative responsibilities and acts of corruption. So that in total there are 32 state systems and each of these systems has instances made up of state public entities, as well as their secondary legislation in the matter, which must be in harmony and equivalence with those of the National Anticorruption System.

## ANNEX VII: DISCLOSURE OF ANY CONFLICTS OF INTEREST



Scheme 1. National Anticorruption System's structure

|                                                                                                                                                                                                                                                       |                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| <b>Name</b>                                                                                                                                                                                                                                           |                                                                           |
| <b>Title</b>                                                                                                                                                                                                                                          |                                                                           |
| <b>Organization</b>                                                                                                                                                                                                                                   |                                                                           |
| <b>Evaluation Position?</b>                                                                                                                                                                                                                           | Team Leader <input type="checkbox"/> Team member <input type="checkbox"/> |
| <b>Evaluation Award Number</b><br>(contract or other instrument)                                                                                                                                                                                      |                                                                           |
| <b>USAID Project(s) Evaluated</b><br>(Include project name(s),<br>implementer name(s) and award<br>number(s), if applicable)                                                                                                                          |                                                                           |
| <b>I have real or potential conflicts of<br/>interest to disclose.</b>                                                                                                                                                                                | Yes <input type="checkbox"/> No <input type="checkbox"/>                  |
| <b>If yes answered above, I disclose<br/>the following facts:</b><br><i>Real or potential conflicts of interest may<br/>include, but are not limited to:</i><br>1. Close family member who is an employee of<br>the USAID operating unit managing the |                                                                           |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <b>Name</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  |
| <p><i>project(s) being evaluated or the implementing organization(s) whose project(s) are being evaluated.</i></p> <p>2. <i>Financial interest that is direct, or is significant though indirect, in the implementing organization(s) whose projects are being evaluated or in the outcome of the evaluation.</i></p> <p>3. <i>Current or previous direct or significant though indirect experience with the project(s) being evaluated, including involvement in the project design or previous iterations of the project.</i></p> <p>4. <i>Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose project(s) are being evaluated.</i></p> <p>5. <i>Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose project(s) are being evaluated.</i></p> <p>6. <i>Preconceived ideas toward individuals, groups, organizations, or objectives of the particular projects and organizations being evaluated that could bias the evaluation.</i></p> |  |

I certify (1) that I have completed this disclosure form fully and to the best of my ability and (2) that I will update this disclosure form promptly if relevant circumstances change. If I gain access to proprietary information of other companies, then I agree to protect their information from unauthorized use or disclosure for as long as it remains proprietary and refrain from using the information for any purpose other than that for which it was furnished.

|                  |  |
|------------------|--|
| <b>Signature</b> |  |
| <b>Date</b>      |  |

## ANNEX VIII: FIELD VISIT REPORT

The evaluation team visited four states besides Mexico City to conduct interviews and workshops from August to October 2019.

**Table 45. Cities Visited**

| State       | Cities                        | Dates 2019                    |
|-------------|-------------------------------|-------------------------------|
| Coahuila    | Saltillo and Torreón          | August 20–22<br>August 29–30  |
| Chihuahua   | Chihuahua                     | August 29–30<br>September 1–2 |
| Mexico City | Mexico City                   | August 15–October 15          |
| Nuevo León  | Monterrey’s metropolitan area | August 26–29                  |
| Sonora      | Hermosillo and Cananea        | August 28,<br>September 5–6   |

## **ANNEX IX: EVALUATION TEAM MEMBERS**

### **Ernesto Velasco Sánchez, Ph.D. – Team Leader**

Ernesto specializes in program evaluation in the public and not-for-profit sectors. He has been a recurrent program evaluator with the National Council for Evaluation of Social Policy in Mexico. He has conducted consultancy projects for the Inter-American Development Bank, the United Nations Development Programme, The William and Flora Hewlett Foundation, and Transparency International, among others, and is a former member of the International Experts Panel of the Independent Reporting Mechanism, Open Government Partnership.

### **Pamela Huerta – Evaluator**

Pamela has over nine years of work experience, including program design, management, and evaluation in governance-related affairs. She has held positions at the government, corporate, and INGO sectors. During the past three years as an independent consultant, she has coordinated and conducted monitoring, evaluation, and learning activities for diverse international donors, including USAID and the Inter-American Development Bank. Past MEL activities include conducting fieldwork, writing performance evaluations, developing monitoring and evaluation tools, building indicators, and conducting data analysis and reporting, with a growing focus on crime and violence prevention, social development, and anti-corruption. Pamela holds a BA in Political Science and International Relations from CIDE University (Mexico) and an MSc in Comparative Politics from the LSE (UK).

### **David Rodríguez – Evaluator**

David has been a researcher and consultant in public policy for over 10 years. He previously worked for the Mexican Institute for Competitiveness (IMCO), Fundación IDEA, C230 Consultores, and Abt Associates, and has been an independent consultant for the past two years. David holds a BSc in Business Engineering from ITAM and an MA in Social Sciences from the University of Chicago.

### **Juan Martínez – Evaluator**

Juan holds a master's in Corruption Studies and has extensive knowledge of integrity strategies and theoretical perspectives on corruption.

### **Isabel Sandoval – Evaluator**

Isabel has experience implementing international cooperation projects and working with CSOs. She has been an independent consultant for the past two years focusing on civil society participation and open government. Isabel holds a bachelor's degree in Political Science and International Relations from ITAM.

**Eduardo Alamillo – Analyst**

Eduardo holds a bachelor's degree in public administration and has experience as a research assistant in different public affairs research projects.

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