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MEXICO TRANSPARENCY RAPID RESPONSE PROJECT

Final Report

October 1, 2016 to January 31, 2022

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ACRONYMS & ABBREVIATIONS

ASE	State Supreme Audit Institution (<i>Auditoria Superior Estatal</i>)
ASEQROO	State Supreme Audit Institution of Quintana Roo (<i>Auditoria Superior del Estado de Quintana Roo</i>)
CC	Coordinating Committee (<i>Comité Coordinador</i>)
CCIL	Civic Counsel of Institutions of La Laguna (<i>Consejo Cívico de las Instituciones de La Laguna</i>)
CIDE	Center for Economic Research and Teaching (<i>Centro de Investigación y Docencia Económicas</i>)
CONAFA	National Association of Special Anti-Corruption Prosecutors (<i>Convención Nacional de Fiscales de Anti-Corrupción</i>)
CPC	Citizen Participation Committee (<i>Comité de Participación Ciudadana</i>)
CSO	Civil society organization
FECC	Special Anti-Corruption Prosecutor's Office (<i>Fiscalía Especializada en el Combate a la Corrupción</i>)
FY	Fiscal Year
FICOSEC	Trust for Competitiveness and Citizen Security (<i>Fideicomiso para la Competitividad y Seguridad Ciudadana</i>)
GOM	Government of Mexico
HIRPROL	Tool for Identifying Risks of Corruption of Local Social Programs (<i>Herramienta de Identificación de Riesgos de Corrupción de Programas Sociales Locales</i>)
INAI	National Institute for Transparency, Access to Information and Personal Data Protection (<i>Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales</i>)
IPRA	Report of Serious Administrative Offense (<i>Informe de Presunta Responsabilidad Administrativa</i>)
ISAF	State Supreme Audit Institution of Sonora (<i>Instituto Superior de Auditoría y Fiscalización</i>)
MOOC	Massive Open Online Course
NGO	Non-Governmental Organization
OIC	Internal Audit Unit (<i>Órgano de Control Interno</i>)
PDN	National Digital Platform (<i>Plataforma Digital Nacional</i>)
PEA	Political Economy Analysis
RNV	Non-Binding Recommendations (<i>recomendaciones no vinculantes</i>)
RRI	Rapid Results Institute
SEA	State Anti-Corruption System (<i>Sistema Estatal Anticorrupción</i>)
SEFIRC	Coahuila's Ministry of Public Administration (<i>Secretaría de Fiscalización y Rendición de Cuentas del Estado de Coahuila</i>)
SESNA	Executive Secretariat of the National Anti-Corruption System (<i>Secretaría Ejecutiva del Sistema Nacional Anticorrupción</i>)
SFP	Ministry of Public Administration (<i>Secretaría de la Función Pública</i>)
SNA	National Anti-Corruption System (<i>Sistema Nacional Anticorrupción</i>)

Tec de Monterrey	<i>Instituto Tecnológico y de Estudios Superiores de Monterrey</i>
TJA	Administrative Court (<i>Tribunal de Justicia Administrativa</i>)
TRRP	Transparency Rapid Response Project
UNDP	United Nations Development Program
USAID	United States Agency for International Development
USG	United States Government
Y	Year

EXECUTIVE SUMMARY

Project Overview

Activity Name	Mexico Transparency Rapid Response Project (TRRP)
Start and End Date	October 1, 2016 to January 31, 2022
Name of Prime Implementing Partner	Checchi and Company Consulting, Inc.
Contract Number	AID-OAA-I-13-00034; Task No. AID-523-TO-16-00003
Main Counterpart Organizations	<ul style="list-style-type: none"> • <i>Comité de Participación Ciudadana-CPC</i> (Citizen Participation Committee) of the National Anti-Corruption System (SNA) • <i>Red Nacional de CPCs</i> (National Network of CPCs) • <i>Convención Nacional de Fiscales Anticorrupción-CONAFA</i> (National Association of Anti-Corruption Prosecutors) • <i>Secretaría Ejecutiva del Sistema Nacional Anticorrupción-SESNA</i> (Executive Secretariat of the National Anti-Corruption System) • Civil society organizations (CSOs) • State Anti-Corruption Systems (SEAs) and other local stakeholders in target states
Geographic Coverage (cities and or states)	<ul style="list-style-type: none"> • Nationwide coverage through collaboration with national networks of SNA implementers and selected SEAs (Chihuahua, Coahuila, Guanajuato, Nuevo León, Sonora, Jalisco, Zacatecas and Quintana Roo)
Reporting Period	October 1, 2016 to January 31, 2022

Key Accomplishments

The Mexico Transparency Rapid Response Project (TRRP or the Project henceforth), awarded by the United States Agency for International Development (USAID) and implemented by Checchi and Company Consulting, was active from October 1, 2016 through January 31, 2022. The Project was designed as a demand-driven, flexible implementation mechanism to support the implementation of Government of Mexico (GOM) transparency, accountability and anti-corruption programs. The TRRP strengthened interinstitutional coordination mechanisms, enhanced GOM capacities, and facilitated the engagement of CSOs at the federal and state levels to prevent, investigate, and penalize corruption more effectively. Actions taken were organized under four components¹: 1) Demand-driven Technical Assistance, 2) Capacity-Building, 3) Rapid Results, and 4) Small Grants. The following offers a summary of key achievements by component.

Component I: Demand-Driven Technical Assistance

- Political Economy Analyses (PEAs): A PEA was conducted at the beginning of each of the first five years of the Project. The PEAs provided updates regarding relevant stakeholders and described objectives and challenges for an anti-corruption agenda at the national level and in target states.
- Strengthened capacities of anti-corruption bodies including the National Citizen Participation Committee (CPC), network of state-level CPCs, National Association of Special Anti-Corruption

¹ Activities in the first three years of the Project were organized differently; however, we are reporting them following the restructured components shown here.

Prosecutors (CONAFA), National Anti-Corruption System (SNA) and State Anti-Corruption System (SEAs), and other key stakeholders. Some of the outputs of this work included a nationwide consultation process and drafting of a National Anti-Corruption Policy; communication materials on the importance of the SNA; a strategic plan and a media strategy for the National CPC; guides for SEAs on access to information; manuals to streamline processes and increase efficiency for the CPC Network and individual state-level CPCs; and annual meetings, training plans, and studies conducted to support CONAFA.

- Training of SEAs in Chihuahua, Sonora, and Quintana Roo: In Chihuahua, this involved support in drafting the state law to establish the SEA, developing a strategic plan, revamping auditing processes with the state Ministry of Public Administration, and streamlining administrative procedures for resolving corruption-related cases with the state Judicial Council. In Sonora, this involved training for the State Supreme Audit Institution (ISAF) on the General Law of Administrative Responsibilities, compiling investigation files, and forensic auditing (which resulted in the official adoption of a Forensic Auditing Manual); and support in developing a strategic plan for the state General Comptroller's Office. In Quintana Roo, TRRP worked with the State Audit Institution (ASEQROO) to develop guidelines for corruption investigation as part of an integrated capacity-building strategy.
- Support for specific anti-corruption initiatives, including the Social Witness program, the National Anti-corruption Policy, legislation linked to the SNA, and public outreach activities: TRRP worked with the Ministry of Public Administration (SFP) to design, launch, and then assess a Social Witness program, which provided a mechanism for external groups to monitor public procurements. In collaboration with the CPC and the Executive Secretariat of the National Anti-Corruption System (SESNA), TRRP collected inputs and helped draft the National Anti-Corruption Policy. TRRP also supported additional anti-corruption legislation including regulatory processes in Chihuahua and Nuevo León, a State Administrative Responsibilities Law and a reform proposal to the penal code in Nuevo León, a proposal for a public procurement law with the CSO *Ciudadanos Contra la Corrupción*, and a new State Government Audit Law in Chihuahua. Public outreach activities included activities for the International Anti-Corruption Day each year, "Datathons" in coordination with SESNA, and other communication activities, such as the "Incorruptible" app and website and the website for the CPC of Sonora. Datathons were events that engaged data analysts and information technology specialists to develop tools that facilitate the identification of potential cases of corruption from information on the National Digital Platform (PDN).

Component 2: Capacity Building

- Massive Open Online Courses (MOOCs) on the SNA and anti-corruption topics: Together with the Center for Economic Research and Teaching (CIDE), TRRP supported the design and launch of a four-module MOOC for public authorities and civil society on administrative responsibilities and public sanctions for corruption, which was officially incorporated into several government training programs. Through December 2021, Modules 1 and 2 registered 76,502 participants, while Modules 3 and 4 registered 5,625 participants.²
- Specialized trainings to strengthen GOM anti-corruption capacities: Other specialized trainings for public officials included sessions on SNA and administrative responsibilities, fraud auditing, international financial investigation, oral litigation, and various other topics.
- Strengthened anti-corruption capacities of civil society representatives through the MOOCs and collaboration with the National CPC through the Citizen Outreach Committee. To support this collaboration, TRRP identified over 46,000 registered CSOs and gained further details from nearly

² People who participated in both phases are included in both totals (double counted).

2,000 CSOs involved in anti-corruption work which serves as a key database for CSO collaboration. Another key achievement was support for the consolidation of the CSO Anti-Corruption Network in Quintana Roo.

Component 3: Rapid Results

- Promoted quick, relevant, and tangible results to curb corruption through 100-Day Challenges: In collaboration with its subcontractor the Rapid Results Institute (RRI), TRRP designed and implemented “100-day Challenges” for combating corruption with 13 teams made up of SEA governmental, private sector, and CSO stakeholders from six target states, representing the first-ever use of RRI’s methodology for anti-corruption measures. This was then adapted for virtual implementation due to the COVID-19 pandemic. Each team set a goal with targets and often surpassed the targets. Given the success of this methodology, several teams opted for additional rounds.
- Significant improvements in processing of corruption cases: Using the 100-Day Challenges methodology, 13 teams from Coahuila, Jalisco, Guanajuato, Quintana Roo, Sonora, and Zacatecas established targets related to improving the productivity and response time for cases of serious and non-serious corruption crimes. These targets include an increase in the number of corruption cases received, cases investigated, number of charges pressed, cases resolved and prosecutions as well as increased transparency of public procurements and the number of procurements analyzed for potential corruption. All but one team reported improvements over baseline.³ Some significant increases included 66 resolved cases of administrative corruption in Coahuila, a nine-fold increase over the previous period; 10 criminal investigations in Jalisco, a five-fold increase; 140 cases resolved in Guanajuato, a nearly four-fold increase; 65 charges pressed in new criminal corruption cases in Quintana Roo, an eight-fold increase; 28 charges pressed in Sonora, a three-fold increase; and 43 resolutions in Zacatecas, a three-fold increase. In addition, these activities created spaces for collaboration and innovation between public officials, resulting in increased standardization of criteria and more efficiency between courts to resolve cases.

Component 4: Small Grants

- Mobilized public broad-based support for SNA implementation through a small grants program: A total of US \$141,601 was awarded to the *Consejo Cívico de las Instituciones de La Laguna* (CCIL), *Instituto Tecnológico y de Estudios Superiores de Monterrey* (Tec de Monterrey), GESOC, and Bios to support SEAs to implement oversight activities. CCIL developed an online dashboard to display results of the Internal Audit Units (OICs) in Coahuila, which served to identify institutional shortcomings and propose recommendations aimed at strengthening operations. Tec de Monterrey developed an observatory mechanism to measure the performance of the entities charged with corruption investigation, sanction, and asset recovery, and a public dashboard to display these results. GESOC conducted a corruption risk assessment for programs in 14 states and municipal social welfare programs in six states, offered recommendations for their follow-up, and trained students and other stakeholders on the methodology. Bios identified corruption risks related to the approval process and implementation of 21 tourism development projects with potential environmental impacts in 10 municipalities of the Maya Riviera, Quintana Roo and published the results online. Bios also trained students and local stakeholders to continue to identify these risks.

³ Team 2 from Jalisco withdrew from participation due to lack of support from the Special Anti-Corruption Prosecutor’s Office

Overall, TRRP achieved and surpassed all Project indicator targets except for one, which was achieved at 90% (achieving 9 legislative and/or procedural reforms to bring Federal and/or State legal framework into compliance with the SNA, of the 10 targeted).

Challenges encountered during implementation included the need to adapt key Project strategies to virtual formats in response to COVID-19 measures; the difficulty in the identification of qualified grantees and contractors with the specialized knowledge and skills necessary to implement Project activities, the additional technical assistance required to standardize the quality of work and digital deliverables in the Small Grants Program, and the uncertainty of the sustainability of the mechanisms/platforms developed by grantees of the Small Grants Program, among others.

As for **cross-cutting elements**, TRRP tracked and reported participation by men and women as a way to increase visibility regarding *gender equality* in project participation. The Project also relied on several strategies to foster the *sustainability* of results—these included 1) the 100-Day Challenge methodology to promote the use of innovative processes to increase efficiency, 2) supporting sustained use of tools developed by grantees in the Small Grants Program, 3) the institutionalization of key project tools, 4) increasing access to online training, and 5) developing multi-actor coalitions. Regarding *policy and governance support* TRRP supported the drafting and advocacy of several public policies, including the National Anti-Corruption Policy. Also, TRRP promoted *science, technology, and innovation* through the Datathons, the use of the 100-Day Challenges methodology for anti-corruption measures, digital dashboards with grantees, and social auditing/observatory mechanisms.

Throughout implementation, TRRP relied on **stakeholder participation and involvement** from SNA governing and operating units; federal/national agencies in CSOs based in Mexico City; and state-based entities from Chihuahua, Coahuila, Nuevo León, Quintana Roo, and Sonora.

Lessons learned throughout the Project include the following: Prioritization to carry-out activities in states with the political will, the need for apt conditions, and keeping the focus on sustainable but flexible results in order to identify continuous improvements; a series of good practices identified in carrying out the 100-Day Challenges more effectively; using a local systems approach combined with tailored technical assistance and co-creation to foster greater ownership over products and capacities developed with SEA institutions; and engaging local actors to drive forward commitments by local governments to combat corruption.

Based on the experience in implementation, lessons learned, and results, TRRP has identified the following **recommendations** that can be applied to the current USAID/ProIntegridad project: optimize methodologies to ensure their adaptability to virtual or in-person formats; take measures to ensure the quality of work during such conditions and adjust contracts to reflect significant changes in methodologies and working dynamics accordingly; integrate the gender perspective as a formal component to project activities; engage in training on sexual harassment and discrimination in the workplace; develop a broader, more continuous vision of grant programs and their ultimate objectives.

Annexed to this report is the Performance Indicator Tracking Table; success stories; a list of host country, international donor, and financial institution contact and collaboration efforts; and a table of key products.

INDICATOR RESULTS

Indicators	Baseline (FY16)	Year 1 (FY17)	Year 2 (FY18)	Year 3 (FY19)	Year 4 (FY20)	Year 5 (FY21)	Year 6 (FY22)	Cumulative Total	Project target	Performance Achieved (%)	
1. Number of legislative and/or procedural reforms to bring Federal and/or State legal framework into compliance with the SNA	0	1	4	2	--	1	1	9	10	90%	
2. 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)	0	14	2	4	--	3	--	23	15	153%	
3. Number of USG supported anti-corruption measures implemented (2.2.4-7)	0	1	9	6	3	5	3	27	22	123%	
4. Number of CSOs assisted	0	36	24	60	16	20	4	160	71	225%	
5. Number of CSOs receiving USG assistance engaged in advocacy interventions (2.4.1-9)	0	14	6	11	--	19	3	53	31	171%	
6. Number of government officials receiving USG-supported anti-corruption training (2.2.4-2)	W	0	346	295	6,831	4,690	5,820	1,182	19,164	--	
	M	0	308	433	4,994	3,405	5,336	854	15,330	--	
	Other	0	1	0	0	0	6	1	8	--	
	Total	0	655	728	11,825	8,095	11,162	2,037	34,502	8,926	387%
7. Number of people affiliated with non-governmental organizations (NGOs) receiving USG supported anti-corruption training (2.2.4-5)	W	0	120	203	5,338	567	1,465	491	8,184	--	
	M	0	152	169	2,603	477	1,731	363	5,495	--	
	Other	0	1	0	0	0	6	0	7	--	
	Total	0	273	372	7,941	1,044	3,202	854	13,686	2,680	511%
8. Number of USG supported anti-corruption measures implemented at the subnational level (2.2.4-7)	0	9	16	17	2	18	4	66	37	178%	
9. Number of governing and executive units of the SNA and SEAs established and/or operating with USAID support	0	--	29	61	48	63	41	242	113	214%	
10. Number of innovations in place to prevent, investigate and penalize corruption more effectively	0	--	2	2	1	33	6	44	27	163%	

Further details on the final indicator results are provided in the Performance Indicator Tracking Table (Annex A).

SUMMARY OF PROGRAM IMPLEMENTATION

Component I: Demand-Driven Technical assistance

This component had three sub-objectives:

1. Sub-Objective 1.1. Identify SNA-implementation challenges, priorities, and opportunities to advance anti-corruption initiatives;
2. Sub-Objective 1.2. Provide continued assistance to SNA operating and executive units at the national and state levels; and
3. Sub-Objective 1.3. Advance anti-corruption initiatives led by federal and state GOM agencies.

The first sub-objective involved the use of political economy analyses to identify challenges, priorities, and opportunities which informed Project strategies each year. The second was technical assistance to national and state-level SNA actors including the CPCs, CONAFA, comptroller offices, and auditors. The third involved support for GOM initiatives, such as the Social Witness Program, the National Anti-corruption policy, legislative reforms, and public outreach activities to promote multi-sectoral participation in anti-corruption. After initial reluctance by key governing and operating units of the SNA in the first years of the Project, TRRP adjusted its strategies to ensure all technical assistance was demand-driven to respond to the expressed needs and interests of SNA and SEA actors, while also cultivating productive relationships with these and other key stakeholders.

Sub-Objective 1.1. Identify SNA-implementation challenges, priorities, and opportunities to advance anti-corruption initiatives

Political economy analysis (PEA)

Each year, TRRP conducted a PEA to gain an understanding of the relevant stakeholders, objectives, and challenges for an anti-corruption agenda at the national level and in target states. TRRP collected these perspectives partly from literature and media reports, but principally through 40-65 interviews with a variety of actors, including high-level public officials of the SNA and SEAs, journalists, academics, and representatives of civil society organizations. Each year, the PEA focused on a specific theme that informed the Project strategy. The following describes the focus of each PEA.

- Year 1 (Fiscal Year-FY 2017): An analysis of the prevailing political and social context affecting the implementation of the SNA as well as the incentives, relationships, resources, and levels of influence of SNA stakeholders. This informed the Project strategies related to the most suitable counterparts at the national and state levels, and the conditions necessary to support the sustainability of the SNA.
- Year 2 (FY2018): The PEA focused on collecting perspectives from the government, civil society, academia, the private sector, and the incoming administration on priorities, opportunities, and challenges in the implementation SNA, as well as on a state level in four prioritized states: Chihuahua, Nuevo Leon, Sonora, and Coahuila.
- Year 3 (FY2019): The PEA analyzed the evolving political context that affected SNA and SEA implementation to inform Project strategy and avoid becoming entangled in sensitive issues, such as internal conflict amongst CPC members, or between influential SNA stakeholders and the national CPC. The PEA also identified opportunities to expand the Project in other states.
- Year 4 (FY2020): The focus of this PEA was to assess two main anti-corruption approaches: 1) the SNA and 2) the initiatives that the Lopez Obrador administration was executing through the

Federal SFP, the Financial Intelligence Unit, and the Federal Special Anti-Corruption Prosecutor's Office.

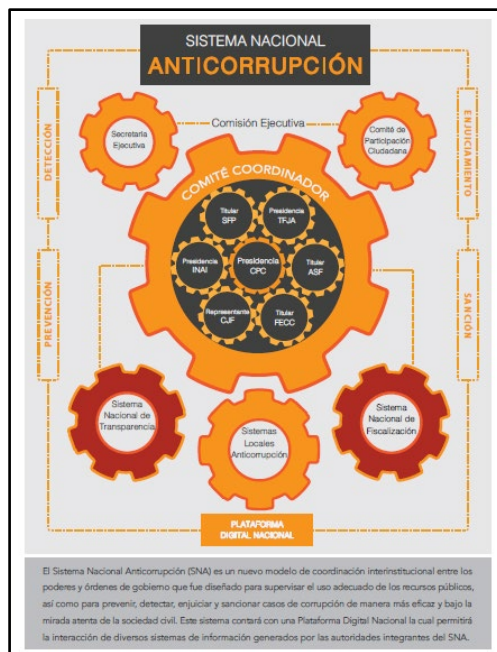
- Year 5 (FY2021): The objective of this PEA was to identify challenges, priorities, and partners in the private sector related to business integrity, ethics, and transparency to strength the local business climate and the resilience of critical supply chains. The PEA focused on four critical sectors: automotive, aerospace, electronics, and critical minerals. The PEA provided a list of recommendations for concrete actions to use in business integrity programming. These findings helped inform the USAID/Mexico ProIntegridad activity that was awarded in FY21.

Sub-Objective 1.2. Provide continued assistance to SNA operating and executive units at the national and state levels

TRRP offered personalized technical assistance in promotion, consolidation, strategic planning, and operational procedures for the National CPC, the network of state-level CPCs, CONAFA, the SNA and SEAs, and other key stakeholders through a series of activities as described below.

Raising awareness of the SNA and SEAs

During the first years of implementation, TRRP focused on raising awareness and understanding of the importance of the SNA and SEAs among public officials, CSOs and the general public. For example, in Y1 the Project teamed up with *Ethos*, a local think tank, to print 20,000 copies of an illustrated booklet on the SNA to create greater awareness of the SNA in an accessible and easy-to-understand manner. TRRP also designed infographics on the overall characteristics and functions of each element of the SNA as part of a package of introductory materials.



Above: Anti-Corruption Booklet.
Left: SNA Infographic cover.

Support to strengthen the National Citizen Participation Committee (CPC)

TRRP supported the National CPC, the main channel of interaction between civil society and the public entities comprising the SNA, since its inception in early 2017. During Y2, the TRRP team overcame the initial reluctance of key governing and operating units of the SNA by providing high-level technical support that responded to local needs and priorities. The Executive Secretariat of the National Anti-Corruption System (SESNA) also began working closely with the Project in a nationwide consultation process to develop a National Anti-Corruption Policy.



National CPC members meet with the Coordinating Committee of the Sonora SEA in a July 2019 trip sponsored by the TRRP to help the national CPC strengthen ties with state CPCs.

This collaboration took shape with the development of a strategic plan, core internal operational procedures, and strategic lines of action. With TRRP guidance, the National CPC agreed to a unified mission and shared agenda, identified strategic lines of action in the short, medium, and long-term and developed a work plan including performance indicators to track progress in its implementation. With Project support, the National CPC drafted and approved its five-year strategic plan in October 2019. This document now guides the ongoing work of the national CPC, critical for the consolidation of the SNA. The National CPC is now a consolidated entity, working collaboratively on strategic action items from its shared agenda.

Support to consolidate and strengthen the National Network of CPCs

In Y2, TRRP began actively supporting the formation of the National Network of CPCs with the objective of building their institutional capacity and work toward shared agendas and common action items. This Network, composed of the national CPC and its peers from 27 states, serves to exchange experiences and lessons learned on how to strengthen collaborative ties with civil society organizations at the state level, including academia and private sector, and discuss strategic activities to reach out and mend strained relations with some of the most prominent anti-corruption CSOs based in Mexico City.

During Y2, the Project and the National Institute for Transparency, Access to Information and Personal Data Protection (INAI) launched a manual to guide the SEAs on their role in ensuring access to information. During Y2 and Y3, TRRP co-organized working sessions with the National Network of CPCs. The Third Annual Meeting resulted in the approval of key guidelines to streamline CPC operations and simplify the Network's decision-making processes. In an effort to elevate the visibility of the CPCs' work and their role in fighting corruption, TRRP developed a media strategy that outlined communications needs and provided practical guidance for external communications with the media and general public.

As a result of these efforts, the National Network of CPCs is now a consolidated body, working autonomously and organically. For example, with its newfound ability to take decisive action, it has issued statements to position itself regarding the cases of Jalisco and Oaxaca where legislative actions were identified against the CPCs with the intention of violating their capacities. In Jalisco, the Network spoke out against the proposal of the Citizen Movement and the PAN in Jalisco to eliminate the salary of the five members of the state Social Participation Committee. In Oaxaca, the Network rejected a proposal to remove the CPC by local representatives who wanted to change the name and therefore remove current members and call for the appointment of new members. In both cases, the positioning of the National Network of CPCs helped to make these irregularities visible and stop the legislative proposals.⁴

⁴ https://www.cpcnl.org/wp-content/uploads/2021/09/05-Comunicado_Jalisco.pdf
https://www.cpcnl.org/wp-content/uploads/2021/09/06-Comunicado_Oaxaca.pdf



Sixth Annual Meeting of the National Network of CPCs, November 2019

The National Network of CPCs has proven fully sustainable. The Project played a key role in developing internal decision-making mechanisms and establishing thematic committees, and now, these are led exclusively by CPCs. As a united front, they are very involved in the strategic direction of anti-corruption policies. Overall, TRRP’s support to the Network was a successful, value-added, cost saving strategy that provided a significant, national impact at a very low cost.

Also, TRRP worked to support and strengthen specific state-level CPCs, namely those in Chihuahua and Sonora. TRRP worked with Chihuahua’s CPC to develop a Work Plan by interviewing all members of the CPC as well as other local stakeholders from the private sector, academia, and civil society to identify shared priorities. In addition, TRRP supported the Chihuahua CPC to draft legislative amendments aimed at establishing Internal Audit Units (OICs) at the municipal level and revamp land use permits and construction licenses to mitigate corruption risks in the state. While the 2021 election cycle in Chihuahua put a hold on the passage of these reforms, the Project continued to monitor advances. (See the success story in Annex B for more detail.) For the CPC in Sonora, TRRP helped develop a five-year strategic plan in Y3. This involved carrying out interviews with SEA stakeholders in Sonora to gather their perspectives on the CPC’s work to date, challenges, and opportunities. Afterward, the CPC drafted action items for each strategic objective, with specific deadlines and goals for their implementation.

Technical assistance for the National Association of Special Anti-Corruption Prosecutors (CONAFA)

In Y2, TRRP began support for CONAFA, which resulted in a long-term working relationship. CONAFA is comprised of 26 representatives from the state Special Anti-Corruption Prosecutor’s Offices (FECCs), and was formed to establish priorities, strategies, and policies to optimize and make the work of FECCs more efficient and effective in combating impunity and corruption, in addition to reestablishing credibility with the citizenry and maintaining rule of law.⁵ TRRP assisted CONAFA in its annual meetings, supported monitoring the progress of action plans, and provided targeted technical assistance on several key items. More specifically, this included the following:

“The support of the TRRP has been key in creating and consolidating CONAFA... Their technical, academic, logistical support has been fundamental to CONAFA’s advancement. Their inputs, products, counsel and accompaniment are not only recognized by CONAFA, but by all of the Special Anti-Corruption Prosecutors.”

-Odracir Espinoza, President of CONAFA and Special Anti-Corruption Prosecutor of Sonora

⁵ <http://conafa.com.mx/CONAFA/>

- Execution of CONAFA's First Annual Meeting in Sonora in December 2018 and development of its annual work plan.
- Execution of CONAFA's Second Annual Meeting in Jalisco in November 2019 and development of its annual work plan.
- Organization and facilitation of a virtual event in January 2021 to follow up on the results and progress on key actions items from CONAFA's previous work plan.
- Diagnostic of training needs and development of a comprehensive training plan, some of whose key courses were developed and given by the TRRP.
- Analysis of international law applicable to local FECCs and support for the application of international standards for corruption investigation, prosecution, and asset recovery.
- Development of a comparative study on corruption crime definitions in each state's Criminal Code, with an eye toward standardization of these legal definitions and standards for investigation and prosecution.
- Execution of CONAFA's Third Summit in Saltillo, Coahuila with FECC members, other public officials, members of civil society, academia, and business chambers to identify prioritized actions for 2022 and form a working group to develop an evaluation methodology on the efficiency and effectiveness of the FECCs and strengthen the investigation of crimes related to corruption.
- Compilation and presentation of a guide on international standards for local penal codes.



First Annual Meeting of the National Association of Anti-Corruption Prosecutors (Hermosillo, Sonora, December 2018)

More specifically, to support CONAFA's annual conferences, TRRP implemented a multi-phased methodology. During the 1st phase (2018), TRRP developed the methodology for the CONAFA annual meeting and assisted the CONAFA in its implementation. During the 2nd phase (2019), TRRP assisted in implementing a revised methodology for the CONAFA annual meeting, based on the experience and outcomes from the previous year. For the 3rd phase (2021), the TRRP provided comments and guidance for implementing a methodology developed by the CONAFA. More importantly, TRRP supported CONAFA to revise and update its action plan, which will guide actions by CONAFA members in 2022.

Many of these actions were oriented toward securing the technical and budgetary autonomy of Special Anti-Corruption Prosecutors' Offices, one of the main priorities identified in conjunction with TRRP. The Project's technical assistance to CONAFA sparked the reactivation of its work that had become stagnant during the height of the pandemic. By leveraging operational-level liaisons, the Project collected important information that the Executive Secretary of CONAFA needed, yet had not been able to obtain from FECCs around the country, to fulfill key items for the 2020 Action Plan. The working groups formed by the Project not only allowed for the strengthening of collaborative ties among FECCs but also inspired a team spirit toward engaging in joint advocacy and reform activities. (See the success story in Annex B for more detail.)



Inauguration of the Third CONAFA Summit, November 18th, 2021

Formation and strengthening of State Anti-Corruption Systems (SEAs)

TRRP supported the formation and strengthening of the SEAs in Chihuahua, Sonora, and Quintana Roo by working with CSOs, governor's offices, FECCs, audit institutions, and others in the following ways.

Chihuahua

In Y2, the Project began providing critical guidance for the amendment of the State Constitution to create the state SEA in Chihuahua. Following these necessary amendments, the Project provided support to CSOs and legislators directly involved in drafting the state SEA law, and shared comparative experiences from other states. These initiatives were critical, as Chihuahua had been lagging behind other states in passing the required constitutional reforms. Throughout the process, the Project worked closely with the Trust for Competitiveness and Citizen Security (FICOSEC) to present a technical opinion on two different bills drafted, respectively, by the Governor's office and state Congress to meet the standards set forth by the SNA. Ultimately, the approved reforms incorporated several suggestions from TRRP into a single bill that was the result of the merging these two drafts. Among the adopted suggestions was the creation of an independent court to adjudicate cases of administrative corruption and the allocation of key functions to the governing body of the SEA. With this support, the Organic Law of the Special Anti-Corruption Prosecutor's Office was reformed to implement the SEA in Chihuahua and give this institution full autonomy.



“Collaborative ties with USAID’s ‘Mexico Transparency Rapid Response Project’ resulted in technical assistance and training support that have proven essential in the launching of the State Anti-Corruption System of Chihuahua.”

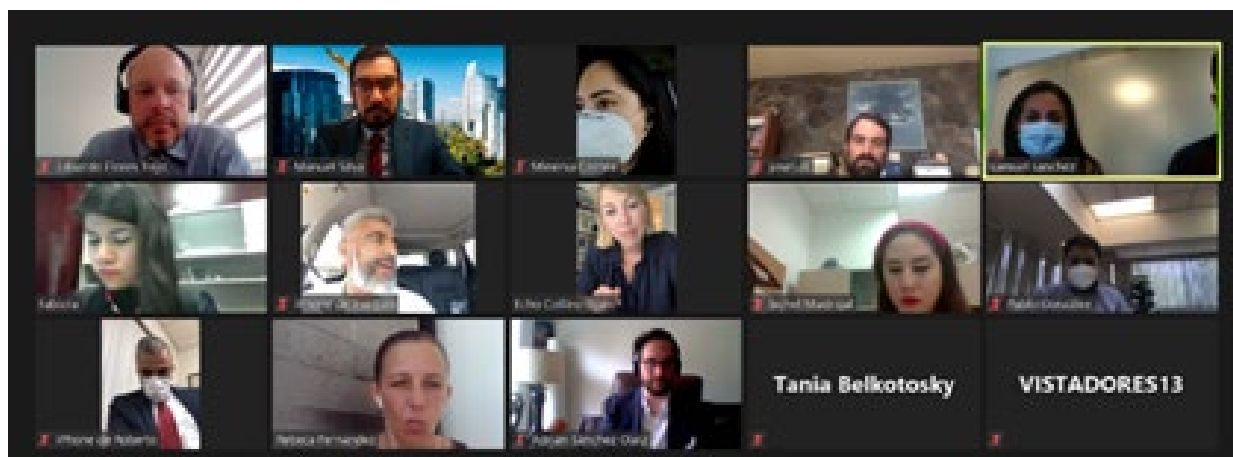
- Annual Report of the Coordinating Committee of Chihuahua’s SEA

The 2018 Annual Report of the Chihuahua SEA included a testimonial about the TRRP’s support.

Once the SEA was established, TRRP supported the development of its strategic plan and selection procedures for its members, which included the establishment of a selection commission and coaching for its newly appointed members on lessons learned and best practices in SEA implementation. This served as an important measure towards strengthening the mandate of the Chihuahua CPC and, in turn, promoting effective implementation of the SEA.

The Project also supported Chihuahua’s Ministry of Public Administration (SFP) to map and revamp its auditing processes to enhance their corruption investigation and detection work making the procedures standardized and more efficient. These new internal regulations can serve as a reference for OICs around the country. These products were developed through a broad consultation process with SFP staff and based on an analysis of state legislation and the Ministry’s own regulations and organizational structure. The new standards serve as a key tool to guide and standardize auditing procedures for additional state government agencies that wish to do the same. The Project also supported Chihuahua’s SFP in the legislative arena by making recommendations on a proposal for its internal regulations as they pertain to auditing, OICs, and citizen oversight of public procurement processes (social witnesses).

Also, TRRP supported the Judicial Council of Chihuahua to accelerate and streamline processes in resolving corruption-related administrative procedures. A team from the Judicial Council set a goal to resolve seven administrative liability procedures over the course of 90 days. The team achieved five resolutions with two procedures pending.



TRRP and its subcontractor RRI meet with representative of Chihuahua’s Judicial Council, August 2020

Sonora

TRRP supported the State Supreme Audit Institution (ISAF) in Sonora with specialized materials and training in topics ranging from the General Law of Administrative Responsibilities to compiling investigation files, and forensic auditing. State-level Supreme Audit Institutions (ASEs) in Mexico are responsible for performing external audits of state and local government agencies. However, most of these institutions lack the obligation and authority to incorporate forensic auditing procedures into regular financial audits of public accounts, unless it is requested by a higher government authority. In a co-creation process with TRRP, the ISAF developed a Forensic Auditing Manual with specific auditing tools to standardize forensic auditing activities, such as planning, final reporting, and follow-up actions. The focus on forensic auditing will allow ISAF auditors to collect appropriate evidence to demonstrate offenses of criminal and administrative responsibilities. Once the manual was completed, TRRP experts led an in-depth training on its use for the ISAF auditing team. The manual came into legal force in Sonora's *Diario Oficial*, where laws are published, on September 20, 2021.

With support from the ISAF's more efficient auditing procedures, the Special Anti-Corruption Prosecutor's Office is now currently investigating at least five formalized complaints of serious administrative offenses against bidders that provided false documentation. For example, in one of these cases, ISAF discovered an offeror who provided false documentation of MXN \$89 million pesos (USD \$4.45 million) collateral in a bid for a government contract to provide ventilators in response to the COVID-19 pandemic. If that company were to default on its contract, the taxpayers would have had to cover those funds. (See the success story in Annex B for further highlights of the TRRP's work with ISAF.)

TRRP also supported the development of the strategic plan for the General Comptroller's Office in Sonora. With the change in the ruling party, a new management team was formed and needed strategic direction. Using a participatory methodology, members of the Office identified the opportunities and challenges posed by the socio-political environment and prioritized action items to its constitutional structure and processes and the professionalism of its staff. The key action items to prevent, investigate, and sanction acts of corruption included improving the processes for investigating administrative offenses (serious and non-serious); promoting transparency in public procurement; support for the social comptroller; and the development of transparency and open data platforms.

Quintana Roo

The Project worked with the State Audit Institution of Quintana Roo (ASEQROO) to develop guidelines for corruption investigation as part of an integrated capacity building strategy. Similar to the Forensic Auditing Standards developed for the ISAF, these guidelines focus on procedures for collecting appropriate evidence to demonstrate offenses in criminal and administrative responsibilities.

Sub-Objective 1.3. Advance anti-corruption initiatives led by federal and state GOM agencies

The following describe actions taken by TRRP to support anti-corruption initiatives led by federal and state GOM agencies. This includes supporting the Social Witness Program with the SFP, National Anti-corruption Policy, legislation linked to the SNA, and other public outreach activities to promote anti-corruption, such as the Datathons.

Social Witness Program

In Y2, the Project worked with the Ministry of Public Administration (SFP) to design and develop a Social Witness program, which provided a mechanism for external groups to monitor public procurements. The SFP and TRRP set up four working groups that focus on government internal control units to discuss reforms needed for a Social Witness program. TRRP documented inputs from these working groups in a report that assessed the units' strengths, challenges, opportunities, and recommendations for a proposed training program. Later in Y3, the SFP and the Project released a report on this program, including an

assessment of the program's current state and outlook, challenges, and opportunities, providing specific recommendations to modernize its operations and further its impact. In addition to presenting the report to all registered social witnesses, the outgoing officials at the SFP also shared it with the new government as part of the formal transition process and to encourage support for continuing citizen oversight over public procurement.



Presentation of report on the Social Witness Program in November 2018

National Anti-Corruption Policy

A major highlight of the TRRP was its contribution to developing the National Anti-Corruption Policy during Y3. This involved several months of collaboration to collect inputs for the draft policy, in collaboration with the CPC and SESNA. The proposed policy, which includes 60 priority action items broken down into four components (impunity, discretionary behavior, citizen participation, and government-society interactions) aims to guide the new administration in its efforts to combat corruption.

Legislation linked to SNA

Throughout the Project, TRRP supported anti-corruption legislation. The following describes the key legislative actions.

Since Y1, TRRP supported Chihuahua and Nuevo León in their regulatory approval processes, specifically, support for a group of CSOs—called the Rule of Law roundtable—and the Chihuahua Congress in the technical analysis to determine the parameters of the proposed Law to establish the SEA in Chihuahua. This analysis also supported the FECC of Chihuahua to prepare the Statutory and Organic Law, giving the institution constitutional autonomy.

In Y3, TRRP offered extensive support to Nuevo León for several legislative reforms in close collaboration with civil society. This included the draft of a State Administrative Responsibilities Law, which was presented to Nuevo León's State Congress. In addition to the national standards for administrative responsibilities, the proposed bill contained new mechanisms to increase the effectiveness of administrative sanctions against corrupt public officials. This law was eventually enacted on June 7, 2019.

Also in Y3, TRRP supported the *Consejo Nuevo León* to draft a proposal to reform Nuevo León's Penal Code, specifically the section on corruption crimes. With TRRP support, the CSO presented the report to representatives from the state congress, other CSOs, and the State Anti-Corruption Prosecutor's Office.

TRRP also worked with the CSO *Ciudadanos Contra la Corrupción* for several months to develop and promote a Public Procurement Law. This involved several working group discussions to collect inputs from public officials tasked with overseeing public procurement processes and representatives of business associations, academia, and civil society organizations. This law proposal sought to restrict conflicts of interest, limit non-competitive awards, and eliminate the participation of ghost companies through the creation of an autonomous body responsible for monitoring public procurement processes and certifying potential vendors.

In Chihuahua, TRRP supported the CPC to review a proposal for a new State Government Audit Law, which would regulate the operations of the State Supreme Audit Institution. Chihuahua's State Congress approved the bill on September 5, 2019.

Public outreach activities

TRRP supported several outreach activities as part of the International Anti-Corruption Day each year of the Project. In 2018, the Project assisted the organization of a full day of activities with the participation of 286 attendees, including federal and state government officials and representatives from CSOs, the private sector, bilateral cooperation agencies, the United Nations, and multilateral organizations. The main objectives of the event were two-fold: 1) present a united front in support of the SNA to win support of the new federal government and 2) motivate the then new Minister of Public Administration to engage in discussions on a National Anti-Corruption Policy and other tools used by the SNA, such as the National Digital Platform. In coordination with SESNA and the United Nations Development Program (UNDP), TRRP organized one of the panel discussions at this event on the challenges and strategies for advancing the implementation of SEAs.

The TRRP's outreach events around International Anti-Corruption Day also included sponsoring "Datathons" in coordination with SESNA in 2018, 2019 and 2021 – with the latter as a virtual event. The Datathons engage programmers, student engineers, data analysts, and information technology specialists to develop data-scraping and evaluation tools using information available on the National Digital Platform (PDN), with an overall goal of identifying potential cases of corruption among public officials and in public procurement contracts. Contestants included teams from universities, NGOs, private companies, and the public sector. Selected results from each year are as follows:

- 2018: The winning team developed an interactive dashboard to show the risk of irregularities in government procurements on the CompraNet platform. <https://www.plataformadigitalnacional.org/blog/primer-edicion-del-dataton-anticorrupcion/>
- 2019: The winning team, comprised of five CIDE students, developed a platform to analyze connections between government contractors and government agencies that might suggest the collusion risks or other corruption crimes. SESNA held a follow-up meeting with the three winning teams to explore integrating the proposed corruption-risk detection tools into the National Digital Platform. <https://www.plataformadigitalnacional.org/blog/dataton-anticorrupcion-2019/>



Datathon participants on December 7, 2019

- 2021: The 2021 Anticorruption Datathon award event was held with the participation of the staff from the National Digital Platform Unit of the Executive Secretariat and the members of the Citizen Participation Committee. Awards were offered for the top teams, which presented projects that allow for the strengthening of a smart data model and improvements to the National Digital Platform. This activity included the participation of data scientists, data engineers, designers, and communication experts, representing over 140 people from 23 states and three other countries (Colombia, Peru and Spain). <https://www.plataformadigitalnacional.org/blog/dataton-anticorrupcion-2021/>



Announcement of the launch of the Incorruptible digital corruption complaint app in Sonora

In Y2, TRRP conducted another outreach activity at the request of the national CPC. The team supported the national and state launches of the Incorruptible platform. The platform consisted of a mobile app and website, run by local CSOs in collaboration with state government agencies that allowed citizens to make geo-referenced corruption complaints.

During Y3, TRRP supported website development for the National CPC and that of the state of Sonora. These websites serve as the primary channel of communication between the CPC and the public. To promote the websites' sustainability, TRRP trained CPC staff in its administration and provided a user manual for updating the sites' content.

Component 2: Capacity Building

This component has two sub-objectives:

- 2.1. Foster and enhance the capacities of key GOM institutions to implement their anti-corruption mandate
- 2.2. Strengthen the skills of civil society representatives to monitor and detect corruption

The first is focused on the trainings offered to GOM institutions and the second for civil society institutions.

Sub-Objective 2.1. Foster and enhance the capacities of key GOM institutions to implement their anti-corruption mandate

All trainings to GOM officials throughout the Project focused on building their capacity to implement SNA requirements to increase the identification and resolution of corruption crimes and combat the impunity in the processes to resolve case of corruption. One of the principal mechanisms to train large numbers of people was through Massive Open Online Courses (MOOCs) for GOM officials and other sectors involved in anti-corruption work. In addition, TRRP conducted several specialized trainings for GOM stakeholders, as described below.

Massive Open Online Courses (MOOCs)

A major accomplishment of the Project was the development of a MOOC on the SNA and the new system of administrative responsibilities and sanctions related to corruption crimes, in conjunction with the Center for Economic Research and Teaching (CIDE). The MOOCs, available free of charge nationwide to public officials, civil society representatives, and the public, greatly expanded the potential reach and impact of Project training, and ultimately the SNA itself by broadcasting these courses on YouTube. The MOOCs consist of four modules:

1. The concept of corruption
2. Introduction to the SNA and criminal corruption offenses and administrative responsibility procedures
3. Corruption crimes
4. Preparing reports of alleged administrative offenses



Launch of MOOC modules in December 2020

Over the course of the Project, TRRP worked with counterparts to develop course content and promote its incorporation into official government training programs. To support participation in the MOOCs, TRRP also co-developed a manual in coordination with CIDE, offering infographics, charts, examples, and case studies, which serves as a reference guide on the subjects covered in the MOOC. With the first launch of the MOOCs, 1,261 people participated. Since its launch, the average participation of government officials in all modules offered per year was over 8,000. Through December 2021, Modules 1 and 2 registered 76,502 participants, while Modules 3 and 4 registered 5,625 participants.⁶

Beyond these numbers, several government institutions incorporated the MOOCs into their training curriculum. This includes 11 states and at least three FECCs (Hidalgo, Michoacán, and Tlaxcala). The Municipality of Cuauhtémoc in Mexico City also adopted the MOOCs as part of the training program for its public officials. (See additional highlights about the MOOCs in a success story in Annex B.)

Specialized trainings

In addition to the MOOCs, TRRP also offered specialized training for several GOM officials based on their needs and interests.

The following describe a sample of some of the key trainings offered, followed by a table that shows a more comprehensive list of the trainings offered throughout the Project for GOM officials.



Virtual MOOC sessions with the University of Kino, May 2021

⁶ People who participated in both phases are included in both totals (double counted).



SNA training manual developed in collaboration with Ethos.

Introduction to SNA and Administrative Responsibilities

During the first years of the Project, significant effort was placed on creating a common understanding of the SNA, not only among public officials, but among civil society and the general public. In collaboration with local think tank *Ethos*, the TRRP team developed a training manual for a six-hour course on the essential aspects of the SNA, covering topics such as the structure and functions of the SNA, the National Audit System, and the new Administrative and Criminal Liabilities for public officials and private citizens. The manual was accompanied by a toolkit that includes PowerPoint presentations and seven case studies for trainers to use to ensure interactive learning discussions with trainees, and in turn the greatest possible impact among participants.

This partnership with *Ethos* was particularly valuable, as it allowed the Project to collaborate with an important CSO stakeholder that is highly knowledgeable on the SNA and ultimately expanded the Project’s impact in the states where *Ethos* operates. The manual and toolkit are a valuable tool for achieving broader training and understanding of the SNA among GOM agencies and CSOs.

Several additional trainings throughout the Project focused on the administrative responsibilities of GOM agencies in the SNA law. This involved representatives from state Administrative Courts (TJAs), state Supreme Audit Institutions, SESNA, state commissions on transparency and access to information, and State Comptrollers Offices, among others. These workshops strengthened institutions’ ability to build a successful case against alleged administrative offenses through improved inter-institutional collaboration.

Fraud Auditing

During Y3, TRRP offered training on government Fraud Auditing that focused on enhancing the skills of state auditors to detect and investigate corruption and collect evidence to initiate administrative and criminal procedures against corrupt officials. TRRP helped develop the guidelines specifically for the State Supreme Audit Institution of Quintana Roo (ASEQROO) and held a three-day training for 25 staff members ASEQROO on these guidelines.

International Financial Investigation

This focus of this training was mutual legal assistance and international financial investigations of corruption for personnel from FECCs and other state authorities. It provided GOM authorities with practical tools and strategies to investigate alleged acts of corruption through international cooperation and identification of final beneficiaries. These were carried out in Sonora, Chihuahua, and Jalisco during Y3 to Y4.

Oral Litigation

This training focused on strengthening the capacity of prosecutors to make solid legal arguments in court by conducting mock hearings of corruption cases involving bribery and abuse of functions. In multi-day trainings, participants from Chihuahua, Zacatecas, and Guanajuato constructed and presented their arguments in oral hearings to achieve probable cause rulings during Y4 to Y5.

Other trainings

The following table offers a summary of all trainings conducted by TRRP to GOM authorities throughout the Project.

Project Year	GOM Agency	Training Topic
Y1 (FY2017)	<i>Secretaría de Transparencia y Rendición de Cuentas</i> in Culiacán and Sinaloa <i>Dirección General de Adquisiciones</i> in Monterrey and Nuevo León	Introduction to SNA/SEA
Y2 (FY2018)	SFP of Chihuahua	Introduction to SNA/SEA
	Sonora's Special Anti-Corruption Prosecutors Office	Legal Assistance for Investigations of Corruption International Financial Investigations
	CPC of Sonora	Role of Civil Society in Asset Recovery
	Sonora's State Supreme Audit Institution <i>Instituto de Acceso a la Información Pública y Protección de Datos Personales de Oaxaca / INAI</i> <i>Contraloría y Transparencia Gubernamental de Nuevo León</i>	Administrative Responsibilities of the SNA
	<i>Contraloría y Transparencia Gubernamental de Nuevo León</i> Sonora's State Supreme Audit Institution CPC of Sonora	Investigation of Corruption Crimes
Y3 (FY2019)	CPC of Sonora	Investigation of Corruption Crimes Substantiating and Adjudicating Administrative Offenses
	<i>Contraloría y Transparencia Gubernamental of Nuevo León</i>	Fraud Auditing
	Chihuahua CPC and SFP	Substantiating and Adjudicating Administrative Offenses Fraud Auditing
	<i>Contraloría y Transparencia Gubernamental of Nuevo León</i>	Compiling Investigative Files in Corruption Cases
	Sonora's State Supreme Audit Institution <i>Secretaría de Fiscalización y Rendición de Cuentas</i> Chihuahua's State Supreme Audit Institution	Fraud Auditing
	Sonora's State Supreme Audit Institution	Critical Thinking Abilities for Government Auditors
	Sonora's Special Anti-Corruption Prosecutors Office	Financial Investigations and Asset Recovery Protocols
	Chihuahua Special Anti-Corruption Prosecutor's Office Jalisco's Special Anti-Corruption Prosecutors Office	Mutual Legal Assistance and International Financial Investigations of Corruption
	Widespread participation	MOOCs modules 1 and 2
Y4 (FY2020)	State Administrative Court and State Supreme Audit Institution of Nuevo León	Administrative Responsibility Procedures of the SNA
	Widespread participation	MOOCs modules 1 and 2
Y5 (FY2021)	FECC in Quintana Roo, Zacatecas, Chihuahua, Guanajuato	Oral Litigation for Corruption Crime
	Widespread participation	MOOCs modules 1 – 4

	State Supreme Audit Institution of Quintana Roo	Investigation of Presumed Administrative Crimes
Y6 (FY2022)	Supreme Audit Institution of Zacatecas Supreme Audit Institution of Guanajuato	Forensic Auditing
	Comptroller's Office of the municipality of Benito Juarez in Quintana Roo	Administrative Responsibilities of the SNA
	Widespread participation	MOOCs modules I - 4

Sub-Objective 2.2. Strengthen the skills of civil society representatives to monitor and detect corruption

In addition to GOM participants, representatives from CSOs were also included in the trainings on the introduction to the SNA and administrative responsibilities as well as the MOOCs, as described above. To boost CSO participation in the MOOCs, TRRP developed a dissemination strategy through infographics, social media posts, and short animated videos

In Y3, the Project assisted the National CPC to reach out to CSOs, private sector associations, and academia at the state level to support CPC compliance with Article 21, section XI of the provisions, which stipulates mechanisms for coordination between civil society organizations.⁷ In collaboration with the Citizen Outreach Committee of the National Network of CPCs, TRRP conducted a mapping exercise to identify over 46,000 CSOs registered in Mexico by researching national databases and compiling name and contact information. The TRRP team then filtered and identified 1,897 CSOs directly involved in anti-corruption work or that might carry out activities linked to the national CPC's mandate.



Working session of the Citizen Outreach Committee of the National Network of CPCs in Sonora, August 2019

Finally, the Project collaborated with the Citizen Outreach Committee of the National Network of CPCs to contact these organizations via email and phone (a total of 4,126 emails were sent), asking them to fill out a form to provide more detailed information on their institutional profile and work. The mapping results include information on all 46,122 organizations, broken down by those that are more likely to be interested in engaging in anti-corruption work, by state and municipality. The map provided a wealth of information to the national CPC in strategic messaging, organizing events in a particular state, and to support its public outreach work. This is a database that the national CPC continuously updates and uses to target communications on their work relevant for civil society organizations.

Another key activity to involve CSOs was the Project's support in helping organize a meeting of the Anti-Corruption Network and other Civil Society in Cancún, Quintana Roo in Y3. The TRRP assisted in developing the agenda and sponsored the participation of 13 representatives from CSOs from across the country. The group of 13 participants were selected based on their active contributions to anti-corruption initiatives at the state level and the proposed candidates recommended by *Ciudadanos por la Transparencia*

⁷ <https://cpc.org.mx/registro-de-las-organizaciones-de-sociedad-civil/>

(the main organizer of the event), Nuevo León's *Consejo Cívico*, and the UNDP. The main objective was to identify and propose new strategies for CSOs to streamline and bolster the operation of SEAs. The event, which gathered 41 CSO representatives from 22 states, concluded with a series of proposed follow up actions to revitalize citizen-driven initiatives to curb corruption; of which the follow-up actions will be supported by UNDP.

Component 3: Rapid Results

This component has one sub-objective, as described below.

Sub-Objective 3.1. Attain quick, relevant, and tangible results to curb corruption

The principal strategy TRRP used to foster quick, relevant, and tangible results was the 100-Day Challenge methodology, implemented by the Project's subcontractor the Rapid Results Institute (RRI).

In collaboration with RRI, the Project began to design and plan the implementation of "100-day Challenges" to combat corruption, representing the first-ever use of RRI's methodology for anti-corruption measures. Per the methodology, the objectives of the Challenges are quantifiable and designed by the participating teams with the assistance of RRI coaches and TRRP team members trained in the methodology. In each state, TRRP brought together a cross section of SEA governmental, private sector, and civil society stakeholders to identify a challenge to prevent, investigate, or penalize corruption, and work jointly toward achieving this challenge in a period of 100 days. The 100-Day Challenges were implemented in six states, kicking off in Sonora in February 2020.

The COVID-19 pandemic presented a significant challenge to the 100-Day Challenges, as the methodology was designed to promote in-person interaction and collaboration among multiple actors. The challenges were temporarily paused between March and September 2020 due to the pandemic, then picked back up virtually in 2021.

The adaptation of the 100-Day Challenge methodology to a virtual format represented a significant effort; TRRP in collaboration with RRI was able to develop new group exercises suited to online tools and adjust the working session schedules to be more dynamic to engage the full attention and interest of participants throughout the process. Feedback from 100-Day Challenge workshop participants was highly positive regarding these changes.

"Beyond the numbers, the 100-Day Challenge methodology allows us to transform the way we work and improve our institutional culture. It helps us break down our tendency to work as silos and gives us the liberty to make our own decisions. We were able to improve our results with the same resources and we did it through effective communication and collaboration."

- Javier Pérez Salazar, Auditor General of the ASE of Guanajuato

"The results we can achieve through the 100-Day Challenges are not only operational but transformational for the lives of all citizens in Quintana Roo... We are changing the history of our state, from one of the worst places for corruption to one of the most exemplary."

- Cynthia Dehesa, President of Quintana Roo's SEA



Closing session of the 100-Day Challenge in Guanajuato

The following table offers a summary of the targets proposed by each team per participating state and the results of their challenge. Given the success and interest generated in these challenges, three states—Guanajuato, Quintana Roo, and Zacatecas participated in two rounds of challenges, as shown below. (Additional highlights from the 100-Day Challenges are included in four success stories in Annex B.)

State	Target per Team	Results
Coahuila	Team 1: Improve the response of the SEA in corruption crimes.	<ul style="list-style-type: none"> Investigations concluded by the Special Anti-Corruption Prosecutor’s Office increased by 267%.
	Team 2: Increase the resolution of cases of corruption in the Comptroller’s Office, the Administrative Court of Justice, and the Judicial Office.	<ul style="list-style-type: none"> The Comptroller’s Office concluded 50 administrative corruption proceedings against alleged corrupt government officials, an increase of 127%. The State Judicial Council resolved 66 administrative corruption proceedings against court officials and staff, an increase in 842% over the number of administrative corruption proceedings resolved during the same period in 2018.
Jalisco	Team 1: Increase the number of cases of administrative offenses that are received by the Court of Administrative Justice (TJA).	<ul style="list-style-type: none"> Team 1 successfully pressed charges in connection with 10 criminal investigations, a 400% increase over baseline. The state Court of Administrative Justice completed the assessment of 8 reports of serious administrative offenses (IPRAs) and issued a sentence for a ninth one.
	Team 2: improve the transparency of public procurements carried out by the institutions that form part of Jalisco’s SEA	<ul style="list-style-type: none"> Team 2 decided to cease its work due to a lack of support from the Special Anti-Corruption Prosecutor’s Office.

Guanajuato	Team 1/round 1: Increase the number of resolutions of cases of serious and non-serious administrative offenses.	<ul style="list-style-type: none"> • The State Supreme Audit Institution (ASE) increased resolutions to 3, up from 1. • The Ministry of Transparency and Accountability increased to 140, up from 37 (a 278% increase). • The TJA increased to 22, from 15. • The Municipal Comptroller of León increased to 4 from 2.
	Team 2/round 1: Increase the number of charges pressed in new criminal corruption cases, as well as those already in process.	<ul style="list-style-type: none"> • The FECC increased to 6 from 2. • 4 restitution agreements, 1 plea bargain agreement with a guilty sentence, and 1 case resolved through pre-trial diversion.
	Team 1/round 2: Increase the presentation of IPRA's and the initiation of criminal investigations in connection with public procurement processes toward identifying possible acts of corruption	<ul style="list-style-type: none"> • ASE increased to 2 from 0. • TJA increased to 1 from 0. • Ministry of Transparency and Accountability increased to 3 from 2.5. • Secretariat of Infrastructure, Communications, and Transportation increased to 2 from 0. • OIC of the state freedom of information institute increased to 1 from 0.
	Team 2/round 2: Increase the number of public procurements and public contracts analyzed for potential corruption risks via an online platform.	<ul style="list-style-type: none"> • Analysis conducted of the public procurement and contracting processes for the year 2021 of the institutions that are part of the challenge.
Quintana Roo	Team 1/round 1: Increase the number of charges pressed in new criminal corruption cases, as well as those already in process.	<ul style="list-style-type: none"> • 65 charges pressed in new criminal corruption cases, a 713% increase in productivity from the baseline of 8.
	Team 2/round 1: Increase the number of resolutions of cases of non-serious and serious administrative offenses.	<ul style="list-style-type: none"> • Supreme Audit Institution achieved 26, a 225% increase over baseline. • State Comptroller's Office achieved 26, a 100% increase over baseline. • Judicial Branch concluded 53 complaints, a 253% increase over baseline.
	Team 1/round 2: Increase the resolution of criminal and administrative responsibility procedures, derived from Administrative Execution Procedures favoring alternative resolution mechanisms in the municipality of Benito Juárez.	<ul style="list-style-type: none"> • 31 prosecutions for crimes for acts of Corruption by the FECC, over a 0 baseline. • 2 complaints for crimes due to acts of corruption presented by the ASE, over a 0 baseline.
	Team 2/round 2: Increase the number of prosecutions for acts of corruption in cases derived from audit findings.	<ul style="list-style-type: none"> • 1 resolution of serious administrative misconduct derived from the Administrative Execution Procedure, over a baseline of 0.

Sonora	Team 1: Increase the number of charges pressed in new criminal corruption cases.	<ul style="list-style-type: none"> • Team 1 pressed charges in 28 cases of criminal corruption, representing a 211% increase in productivity over a baseline of 9. • The monetary value of the reparations to be made to the state and/or municipalities in these cases totaled \$40,831,885.80 MXN (approximately \$2,069,367 USD). Charges were brought against high-level public officials including mayors, treasurers, and general directors from current and previous administrations.
	Team 2: Increase the number of resolutions of cases of serious and non-serious administrative offenses.	<ul style="list-style-type: none"> • Team 2 successfully reduced processing time for cases of serious administrative offenses by 33% and achieved its goal of resolving 5 cases of serious administrative offenses and 6 non-serious administrative offenses.
	Team 3: Increase fulfillment of the non-binding recommendations (RNVs) emitted by the Coordinating Committee (CC) of the SEA.	<ul style="list-style-type: none"> • 5 RNVs fulfilled by public entities, over a baseline of 0. • A significant increase of response rate to RNVs from 143 to 386 out of the 411 pending responses to RNVs issued by the CC, a 170% increase in effectivity.
Zacatecas	Team 1: Increase the number of resolutions of serious and non-serious administrative responsibility cases	<ul style="list-style-type: none"> • 8 resolutions issued by ASE, from a baseline of 0. • 23 resolutions issued by SFP, from a baseline of 11. • 12 resolutions issued by TJA, from a baseline of 2. • In total, there was a 231% increase in the number of resolutions issued.
	Team 2: Increase the number of charges pressed in criminal corruption cases	<ul style="list-style-type: none"> • 17 charges pressed in corruption cases, from a baseline of 8. • 12 probable cause rulings, from a baseline of 4.
	Team 1/round 2: Increase the number of charges pressed by the FECC in new criminal corruption cases derived from Audit findings from the ASE, incorporating sustainability actions from the previous challenge.	<ul style="list-style-type: none"> • 8 prosecutions of complaints from the Superior State Audit, from a baseline of 3.
	Team 2/round 2: Increase the number of resolutions of cases of serious and non-serious administrative offenses, including cases from OICs.	<ul style="list-style-type: none"> • 32 resolutions of serious and non-serious administrative offenses, a 357% increase over baseline.

Component 4: Small Grants

This component has one sub-objective, as described below.

Sub-Objective 4.1 Mobilize public broad-based support for SNA implementation.

TRRP launched a Small Grants Program in the first quarter of Y5, with the objective of supporting CSOs and academia in SEA implementation and oversight activities. A total of US \$141,601 was awarded to the *Consejo Cívico de las Instituciones de La Laguna (CCIL)*, *Instituto Tecnológico y de Estudios Superiores de Monterrey (Tec de Monterrey)*, GESOC, and Bios, following the receipt of unsolicited applications from these organizations. The following describe the actions taken by each and key results.



CCIL gives a public presentation of the dashboard to monitor municipal OICs in Coahuila, August 2021.

Consejo Cívico La Laguna (CCIL)

CCIL developed an online dashboard to evaluate the priorities and needs of the OICs' at the municipal level in Coahuila, which served to identify institutional shortcomings and propose recommendations aimed at strengthening their operations. CCIL evaluated three municipal-level OICs through the monitoring of 95 indicators grouped in four themes: 1) Transparency and access to information, 2) Citizen Participation, 3) Accountability, and 4) Performance. In their final event, CCIL, accompanied by Coahuila's CPC and representatives of OICs in the municipalities of Matamoros, Saltillo, and Torreón, presented the methodology and process for developing the dashboard in an event on [Facebook live](#). CCIL also developed a manual detailing the methodology, so that CSOs can replicate these evaluation exercises in other municipalities. The dashboard, manual, the results of 95 indicators, and a list of recommendations to strengthen the operations of OICs can be found on [CCIL's webpage](#).

Tec de Monterrey

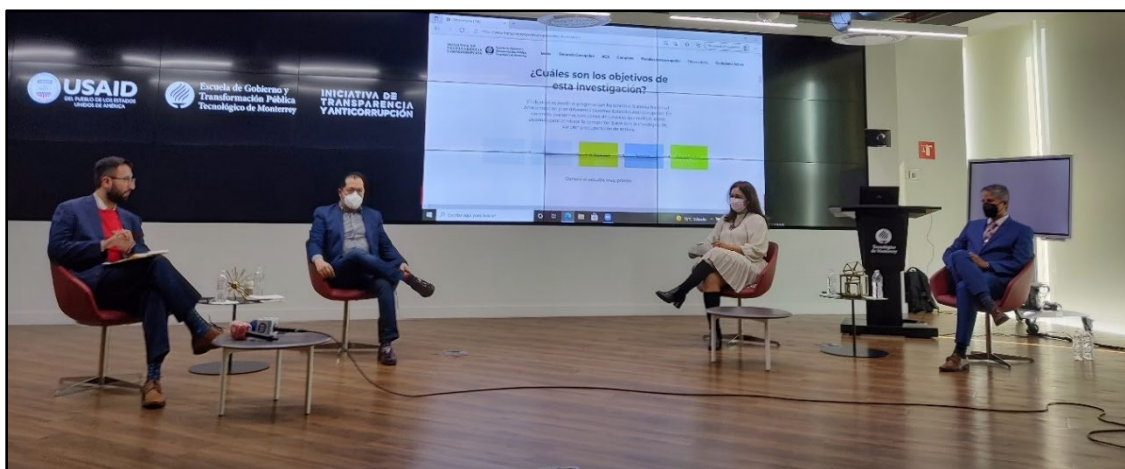
Tec de Monterrey developed an observatory mechanism of the SNA and select SEAs that includes indicators to measure the performance of the entities charged with corruption investigation, sanction, and asset recovery, and a public dashboard showing these results. Tec de Monterrey completed a [webpage](#) that houses these results, as well as a user guide for uploading new data into the platform. The organization also held two events to present and discuss its methodology with more than 80 representatives of CPCs and CSOs from across Mexico (see [YouTube](#)). The second session focused on initial findings of its assessment and exploring potential partnerships with state CPCs and CSOs to sustain this initiative and expand its scope. The results of the Observatory were presented in two events with CPCs and CSOs, SESNA, and journalists. Among the findings from the observatory mechanism were the following:

“I am overjoyed to see the Observatory become a reality and enthusiastic to see its consolidation. This is exactly what the CPCs, and the National Network should be doing—forging alliances with academia to promote citizen participation and linkages within State Anti-corruption Systems to make an impact in the public sphere. I express my gratitude to USAID and the Tec de Monterrey for moving this project forward.”

—Isabel Loperano, CPC of Tamaulipas

- During 2019 and 2020, only 31% of complaints of administrative corruption proceedings have been resolved (5,091 of a total of 16,277). During the same time, only 0.2% of criminal corruption cases resulted in convictions (13 convictions of 6,173 complaints).
- During 2019 and 2020, 1,434 public officials have been sanctioned and asset recovery amounts to MXN \$2,674,000.
- The entities that comprise anti-corruption systems are reluctant to provide public information regarding their operations and results; six out of ten Citizen Participation Committees did not receive any information from the Anti-Corruption System's institutions.
- In at least half of the requests for information, complaints were filed due to lack of response or inadequate response. Supreme Audit Institutions were the institutions that provided the least information.
- Judicial Branches do not keep records regarding sentences, making it difficult to monitor the application of sanctions and asset recovery.

The methodology, complete results and findings of the Observatory of the National and State Anti-Corruption Systems can be found on: <http://www.transparenciayanticorrupcion.mx/observatorio>



Presentation with media companies, Tec de Monterrey, November 2021.

GESOC

GESOC aimed to reduce corruption risks in public programs meant to address the economic and social effects of the COVID-19 crisis. GESOC surpassed its goal of 10 programs in five states by evaluating corruption risks in 14 states and municipal operated social welfare programs in six states. TRRP awarded additional funding to GESOC to evaluate additional social programs in Zacatecas, Coahuila, and Chihuahua and follow up on recommendations provided in the first phase of the grant project.

In an event on November 26th, GESOC presented the results of the corruption risk assessment to the Secretary for Development and the Common Good of Chihuahua for the following nine social programs:

1. Promoting Youth Program- Chihuahuan Youth Institute
2. Promotion of indigenous family production in the Serrana Region - Secretary for Development and the Common Good of Chihuahua
3. Chihuahua grows with you: girls, boys, adolescents and youths - Secretary for Development and the Common Good of Chihuahua
4. State Program of Scholarships and Educational Supports - Secretary of Education and Sports
5. Support for employment in the state of Chihuahua - Secretary of Labor
6. Productive inclusion and solidarity economy - Secretary for Development and the Common Good of Chihuahua

7. Program to Support Relatives of Femicide Victims - Chihuahuan Institute of Women
8. Sports support - Chihuahuan Institute of Sports and Physical Culture
9. Nutritional support for students in basic and high school level - State Commission for Indigenous Peoples

GESOC held a follow-up meeting with Coahuila's Ministry of Public Administration (SEFIRC) to reiterate pending recommendations based on corruption risks evaluations carried out by local CSOs. SEFIRC committed to reviewing these recommendations and providing the requested information. Among the agreements, the CPC, together with the Ministry of Public Function of the state of Chihuahua, will issue a call to review the results obtained and include action items within the State Anti-Corruption Policy of Chihuahua. They also invited GESOC to be part of this process. GESOC's [website](#) details the results of this initiative and explains the methodology and data collection tool which can be replicated for future corruption risks evaluations.

GESOC also trained 50 students from the Tec de Monterrey in Coahuila and Zacatecas, the Autonomous University of Zacatecas, the Iberoamerican University in Zacatecas, and personnel from Executive Secretariat of Zacatecas' SEA on the application of GESOC's methodology to assess corruption risks in social welfare programs and develop proposals for mitigating them. (See the success story in Annex B for more detail.)

Bios

In mid-March of 2021, TRRP awarded a grant to Bios to identify and prevent corruption risks related to the approval process and implementation of tourism development projects with potential environmental impacts in Quintana Roo. Bios traced and evaluated the risks in 21 projects in 10 municipalities of the Maya Riviera, implementing a risk assessment methodology created through the grant. To validate the methodology used and collect recommendations on mitigating corruption risks in the approval and administration of tourism development projects, Bios carried out three public roundtable discussions with key actors. Among the attendees were 20 CSO representatives, 10 municipal authorities, and state tourism authorities. Bios compiled the resulting recommendations, collected from representatives of CSOs, journalists, and local government officials, into a public policy proposal. The municipalities of Benito

Juárez (Cancún) and Cozumel committed to follow-up actions to adopt this public policy proposal.

Bios also held eight events with 30 students from Universidad Anahuac and CSOs in Cancún to prepare them to monitor and identify corruption risks in the approval and administration of tourism development projects.

To sustain the results of this initiative, Bios created a [microsite](#) to publicize the methodology, municipal analysis on permits and transmits, results of the events with students, and videos explaining how the methodology can be replicated in any other state or municipality. With this grant project, Bios won first place in a local government contest to encourage improvements to the



TRRP grantee Bios won a \$10,000 MXN prize in a competition to improve transparency in publicly funded programs, September 2021

organization, supervision and monitoring of social programs, public works, and other projects receiving public funds; it then went on to win second place in the national contest with a prize of USD \$2,000.⁸ (See the success story in Annex B for additional detail.)

Tracking high-profile corruption cases

Finally, as an ongoing activity throughout the Project, TRRP compiled and shared with the Mission updated information and news reports to track the status of high-profile corruption cases, as well as challenges and opportunities in connection with local and national anti-corruption agendas.

“The project brought to light one of the most sensitive issues of local corruption. Moreover, it puts on stage the fragility of the regulatory frameworks that allow the apparent legality of corruption.”

–Participant in the roundtable discussion held by Bios, August 2021

IMPLEMENTATION CHALLENGES

The following offer a series of challenges faced by the Project that were addressed to prevent or mitigate their impact on Project outcomes.

Adapting key project strategies to virtual formats in response to COVID-19 measures: When the COVID-19 pandemic hit Mexico in 2020, TRRP had to adjust training methodologies and all communication with counterparts to online/virtual platforms. This was particularly challenging for the 100-day Challenge methodology. The 100-Day Challenge methodology has been applied in a variety of development projects worldwide. Part of its approach leverages a team spirit to adapt quickly, communicate effectively, and innovate for effective problem solving. The original methodology is largely based on communication and team dynamics that, before the COVID-19 pandemic, were carried out largely in person. With the onset of COVID-19, this had to be adjusted quickly. The Challenges that were in-progress when the pandemic began were paused while TRRP and RRI adapted the activities and tools to an online format.

As the severity of the pandemic has decreased, in the first quarter of Y6 (FY2022), TRRP and RRI began transitioning some of the workshops of the 100-Day Challenges to a hybrid format (i.e., some online and some in-person participation with social distancing measures). For example, the sustainability workshops and What’s Next sessions to close out the second round of Challenges in Guanajuato, Zacatecas, and Quintana Roo were held in hybrid format. While a partial return to in-person activities was very well-received by participants, shifting the methodology to a hybrid format required additional adjustments.

Qualified grantees and contractors with specialized knowledge and skills to implement Project activities proved difficult to find and engage: TRRP received a number of unsolicited applications for the Small Grants Program in the third and fourth quarters of 2020, which required a significant amount of time to evaluate. Once short-list candidates were selected, TRRP also spent a significant amount of time working with potential grantees to clarify questions and refine their proposals to meet qualification criteria. During a first round of proposals, only three qualified grantees were selected (Tec de Monterrey, CCIL, and GESOC), leaving remaining funds destined for the Grant Program unspent. Bios then sent a second proposal for their grant initiative which was approved in March 2021. Although

⁸ Local media reported on the competition, available via the following links:

<https://cancun.gob.mx/entrega-mara-premio-de-contraloria-social-a-comites-benitojuarenses/>

<http://cgc.qroo.gob.mx/reconoce-gobierno-del-estado-a-ganadores-del-premio-nacional-de-contraloria-social-etapa-quintana-roo/>

https://twitter.com/Bios_AC/status/1463924052947570688?s=20

these grant initiatives have now been implemented satisfactorily, they required a significant level of effort with each so their proposal would meet USAID qualification criteria.

Standardizing the quality of work across activities in the Small Grants Program: Although developing digital platforms for the Small Grants Program was not a requirement, each grantee proposed incorporating this type of product into their initiatives. A common challenge among these grantees was recognizing their limited ability, in terms of financial and infrastructure resources, to successfully launch these platforms (or microsites, as they are embedded into each organization’s existing websites). GESOC, Bios, and Tec de Monterrey had limited technical experience for this type of work and the short implementation timeframes and limited financial resources available under the Small Grants Program contributed to this challenge. TRRP did not originally anticipate this lack of experience; therefore, the Project invested much time guiding the grantees and providing *ad hoc* technical assistance in their development.

Sustaining results and scaling-up initiatives to other states through the Small Grants Program: Although each of the grantees proposed a sustainability plan and developed tools that could continue to be used and expanded to other areas, without continued resources to promote and train on the use of these platforms, their sustainability is less likely. For example, Tec de Monterrey developed an innovative Observatory Mechanism of the National and State Anti-Corruption System which made the results of an evaluation of SNA and SEA institutions publicly available, housed on the Tec de Monterrey’s digital platform. However, without additional funding and the sustained commitment of other stakeholders to periodically evaluate these institutions, this may be a one-off exercise, eliminating its potential to serve as a useful, long-term tool for stakeholders to continuously monitor and evaluate those institutions meant to serve as pillars in combatting corruption. Several state CPCs have expressed their interest in sustaining this tool; however, formal commitment and concrete action toward ensuring its continued use is uncertain.

INTEGRATION OF CROSSCUTTING ISSUES AND USAID FORWARD PRIORITIES

Gender Equality and Women’s Empowerment

The Project encouraged civil society and government counterparts to incorporate gender equitable participation in trainings. This included formal requests to all local counterparts receiving training support to commit, where feasible, similar numbers of female and male participants in planned training activities for both in-person and online training. The percentage of female participants in training activities in across all years reached 56.7%, while male participants represented 43.3%, as shown in the table below.

Beneficiaries	CSO Members		Public Officials		Combined CSO Members and Public Officials Trained	
	Total	% of Total	Total	% of Total	Total	% of Total
Female	18,002	55.4%	7,670	60.0%	25,672	56.7%
Male	14,503	44.6%	5,105	39.9%	19,608	43.3%
Other	7	0.02%	7	0.05%	14	0.03%
Total	32,512	100%	12,782	100%	45,294	100%

Sustainability

Sustaining the results of the 100-Day Challenges

The innovation of using the 100-Day Challenge methodology toward anti-corruption initiatives proved to be a successful endeavor and motivated participating institutions and organizations to carry on this work. By spurring transformational changes to work procedures and generating inter-institutional collaboration, this methodology promoted long-lasting change that has results well beyond the Project intervention. For example, one of the goals of the 100-Day Challenge with the SEA of Jalisco was to increase charges pressed in high-profile criminal corruption cases. The 100-Day Challenge further motivated FECC to resolve pending cases as part of their targets for the 100-Day Challenge. In September 2021, Jalisco's FECC successfully pressed charges against the former directors of the state Institute for Forensic Sciences and of the Forensic Medical Service, two high-level public officials accused of abuse of authority in the *Trailers de la Muerte* scandal. Additionally, sentences were handed down to other public officials involved in this case. This is an example of concrete outcomes as a result of the 100-Day Challenges.

In addition, after the close of each round of Challenges, TRRP facilitated a “What’s Next?” session wherein team leaders showcased their innovations and detailed plans to continue improving the processes regarding the resolution of administrative offenses and criminal corruption cases. This involved developing a sustainability plan to continue actions forward. The following offer examples of these commitments:

- In Coahuila, the team created an inter-institutional communications team to continue to hold monthly meetings of the operational teams and have institutionalized and expand the processes and innovations implemented in SEFIRC, State Court, Attorney General’s Office, and Supreme Audit Institution.
- In Sonora, the FECC committed to continue the analysis of the case files to be prosecuted, identifying any deficiencies, and providing feedback to increase the effectiveness of the judicial process.
- In Quintana Roo, the FECC committed to continue investigating and verifying data of the accused and ensuring the inclusion of this information in the initial hearing, which increases the chance of their participation at the initial hearing and prevent rescheduling. They will also deliver digital copies of the files to involved parties.
- In Jalisco, the CC of the SEA formally adopted a guide for filing reports of corruption and administrative offenses, which was published and promoted through digital means. The guide can be accessed online at <https://bit.ly/33XWqji>. In addition, the SEA adopted the methodological guidelines for completing IPRAs, which standardize the process for compiling cases of alleged administrative offenses and acts of corruption.

Sustaining the results of the Small Grants

As part of their application, TRRP asked that each potential grantee include a sustainability plan and in the final reports, grantees were asked about the results of these sustainability plans. The following offers examples of how grantees will support the sustained results of their initiatives.

- GESOC developed a tool to identify corruption risks in conjunction with local actors and civil society and the accompanying guidance on its use to replicate and scale-up its use in other states in collaboration with state CPCs and Executive Secretariats of SEAs, as well as citizen oversight groups formed by representatives of CSOs participating in these evaluations. GESOC’s plan to scale-up the use of this tool is explained on its [website](#). This includes a list of recommendations to mitigate corruption risks.

- CCIL created a partnership with the CPC of Coahuila to promote the replication and adoption of its methodology by other local CSOs. This strategy seeks to scale up CCIL's methodology and continue to evaluate and follow-up on the performance of other municipal OICs in Coahuila. CCIL also continues to hold discussions with the Commission to Integrate Municipalities in Local Anti-Corruption Systems of the National Network of CPCs so that other states can also understand, adapt, and apply the methodology to their local contexts.
- To sustain its efforts to create an observatory mechanism of the SNA and selected SEAs, Tec de Monterrey established a formal commitment from six state CPCs (Hidalgo, Michoacán, Colima, Coahuila, Sonora, and Zacatecas) and two Executive Secretariats of SEAs (Guanajuato and Tamaulipas) to adopt the platform and perform periodic evaluations of the institutions conforming these systems and continue to feed the indicators and update the results displayed on their platform. These eight CPCs and Executive Secretariats of SEAs have expressed their commitment to continue the evaluation next year. The CPCs of Sonora and Zacatecas, and the Executive Secretariat of Guanajuato's SEA received the training on managing the dashboard of indicators and how to upload information in further evaluations. Tec de Monterrey will continue holding training sessions for other CPCs.
- Bios presented the results of the public events and a proposed public policy that are available for replication. Leaders in the municipalities of Benito Juarez and Cozumel committed to adopting the methodology.

Institutionalization of project tools and strategies to guide ongoing work

- **FECC Chihuahua:** Chihuahua's State Congress approved the Organic Laws of the state's FECC and the new structure and functions of this office was formalized in law. Additionally, this TRRP-supported legislative reform serves as a reference for other FECCs in gaining autonomy from their respective Attorney's General Offices.
- **State Audit Institutions of Quintana Roo and Sonora:** To promote the sustained use and formal adoption of the Guidelines for Investigating Administrative Offenses with the ASEQROO and the Forensic Auditing Manual for ISAF, the Project directly involved staff and leadership of these institutions in their development. Additionally, for the correct application of forensic auditing standards described in these documents, the TRRP carried out a training for the staff responsible for investigating and auditing in both ISAF and ASEQROO. ISAF published the Forensic Auditing Manual in the *Diario Oficial* of the State of Sonora (official journal where laws are published), formalizing and obligating its application.
- **SFP in Chihuahua:** The support offered to Chihuahua's SFP allows for the documentation and standardization of all of its auditing processes through the auditing guides and process maps, for the first time since the institution's creation. These guides give detailed procedures on key processes, including a) Annual Audit Programming; b) Audit Planning; c) Audit Launch; d) Audit Execution; and e) Audit Reporting. Additionally, the use of these guides was formalized through the adoption of new Internal Regulations of the SFP, which will be applicable in future state administrations.

Ongoing training

- CIDE will host the server of the MOOCs for one year more after the Project closes. To keep disseminating the courses, CIDE will continue including the materials in its social media publications and in the weekly bulletins that it sends to the members of *Red por la Rendición de Cuentas* which includes teachers, public officials and CSO members.

- In the conclusion of the virtual event for the MOOCs, in addition to the mayor of Cuauhtémoc, commissioners from the Institute for Transparency, Access to Information, Protection of Personal Data, and Accountability of Mexico City, as well as the representatives of Mexico City's Comptroller General's Office participated in the event and agreed on actions to promote the use of the MOOCs among their staff and public officials of other institutions.

Multi-actor coalitions

Throughout the life of the Project, TRRP worked to support the development of coalitions with shared agendas and synergetic action plans that will continue to function beyond the life of the Project. The following offer key examples:

- From the beginning, the Project supported the integration of CONAFA, in which 24 leaders from the FECCs currently participate. These leaders are the main decision-making body for prioritized actions by the network related to its function of criminal prosecution of crimes for acts of corruption. Additionally, the Project supported the formation of an operational team made up of executive officers to monitor the work and achieve the results previously defined by these authorities. CONAFA operates independently of the Project, so it is expected that the collaboration between the country's prosecutors' offices will continue to function beyond Project end.
- The National Network of CPCs is a collective made up of members of the Citizen Participation Committees of the national and state anti-corruption systems. Its technical work has been developed through commissions or working groups linked to members' legal responsibilities within their respective anti-corruption systems. The CPC Network integrates different people with specialized knowledge in the fight against corruption and functions as a space for support, co-creation, analysis, learning and exchange, which allows the generation of specific proposals and their implementation in different areas. During the last years of the Project, the work of this network has been focused on the development of technical activities, supported by civil organizations, universities, business groups and international instances, which has allowed the work to be independent and sustainable.

Policy and Governance Support

TRRP worked to support the design, drafting, and advocacy for several public policies and governance documents, including the following:

- Constitutional amendments passed by the state Congress of Chihuahua to establish the SEA in Chihuahua approved in 2017 and the Acquisitions Law approved in 2017.
- A technical opinion on the Organic Law of the General Prosecutor's Office of the State of Chihuahua with recommendations on how to provide technical autonomy to the Special Anti-Corruption Prosecutor's Office.
- A technical opinion the proposed reforms to the State Administrative Responsibilities Law in Nuevo León and technical support for the drafting of the law.
- Support for the approval of the State Auditing Law in Chihuahua, approved in 2019.
- Support to the FECC in Chihuahua to revamp its draft Organic Law in 2020.
- Support to Chihuahua's SFP in drafting its Internal Regulations in 2020.

- Support to Chihuahua’s CPC in co-creating a proposal to reform the state’s Municipal Code and Urban Development Laws, seeking to mitigate corruption risks and incorporate citizen monitoring mechanisms, approved in 2021.
- Support for the development of the National Anti-Corruption Policy.

Science, Technology, and Innovation Impacts

The Datathons represent an innovative methodology to collaboratively create digital products that, through the use and analysis of data, contribute to the fight against corruption. TRRP supported three of these events to foster the development of technological solutions for asset declaration, public contracting, and sanctioned public officials and individuals, using the information from the National Digital Platform. These tools help the SNA in its work to prevent, investigate and sanction corruption in Mexico.

The 100-Day Challenges were innovative in regard to the first-ever use of this methodology for anti-corruption actions. This proved to be an effective way to motivate actors to improve their productivity.

The dashboard developed by CCIL for the evaluation and follow-up by Internal Comptroller Municipal bodies in Coahuila is a dynamic model that evaluates the performance of the OICs at the municipal level. The first stage covers the municipalities of Saltillo, Torreon, and Matamoros through the monitoring of 95 indicators grouped in four themes: 1) Transparency and access to information, 2) Citizen Participation, 3) Accountability, and 4) Performance. The methodology, the recommendations for improvement to the municipalities, as well as the resources developed for its application can be consulted at <https://oics.ccilaguna.org.mx/>.

Tec de Monterrey developed a microsite of the “Observatory of the National and State Anti-Corruption Systems” showing the results of the evaluation of the performance of Anti-Corruption Systems in investigating, sanctioning, and asset recovery in corruption cases. The user-friendly design allows users to compare the rates of administrative offenses and criminal cases resolutions, the number of public officials sanctioned and the amounts of asset recovery of each of the ten Anti-Corruption Systems considered in this sample. Tec de Monterrey has signed agreements with six Citizen Participation Committees and two Executive Secretariats of SEAs to share the methodology and the digital platform in order to continue the evaluation and expand it to other states in next years.

STAKEHOLDER PARTICIPATION AND INVOLVEMENT

Throughout implementation, TRRP built solid relationships with GOM, civil society, and private sector organizations involved in anti-corruption activities. The following table offers a description of the status of the institutional development of the local organizations and institutions with which TRRP worked and their expected future activities and/or capacity to develop and sustain future programs in similar programmatic areas.

Stakeholder	Institutional Developments	Expected Future Activities / Capacity to Sustain Future Programs
SNA Governing and Operating Units		
CPC of the SNA	Developed and distributed a report entitled “Best Practices in the Implementation and Operation of Anti-Corruption Systems.” This document, which highlights successful practices to streamline SEA operations,	The CPC published the reports on its website and also promoted it on social media at https://bit.ly/35ZSb3S .

	was also developed in collaboration with state CPCs, SESNA, and its state-level counterparts.	
National Network of CPCs	<p>Helped organize the fourth annual meeting of the National Network of CPCs with the participation of 95 CPC members from 30 states and the national CPC. The results of this event included the following key achievements:</p> <ul style="list-style-type: none"> • Approval of guidelines of operations of the National Network of CPCs in order to institutionalize its collaborative work and solidify its decision-making processes. • Development of Work Plans of the Network's eight technical committees, tying each action to the priorities in the National Anti-Corruption Policy. 	The technical committees of the National Network of CPCs are now working independently, without Project support, to implement the actions items under their respective work plans and are conducting activities on an ongoing basis.
SESNA	Supported the organization of the Anti-Corruption Datathons in 2018, 2019 and 2021. Seventy data analysts, engineers, political scientists, legal experts, and information technology specialists competed to develop data analysis tools to detect and prevent corruption, using information available on the National Digital Platform. The tools developed during this activity were mainly directed at detecting potential corruption networks among public officials and government contractors, as well as other relevant patterns in public procurements.	SESNA plans to work with the top three teams from this event to refine their tools and integrate them into the development of the PDN.
Federal/National Agencies and Mexico City-Based CSOs		
CONAFA	<p>Assisted in drafting CONAFA's 2020 Action Plan, which details specific actions toward achieving autonomy of FECCs, as well as the implementation of tools that contribute to solid investigation practices. The Annual Meeting of CONAFA also encouraged Special Anti-Corruption Prosecutors to follow up on their progress to executing their 2019 Action Plan, also developed with TRRP support. Additionally, this meeting provided a space for these Prosecutors to identify ways to strengthen the relationships between FECCs, civil society and investigative journalism.</p> <p>Organization of a working group lead by liaisons from each of the CONAFA member FECCs to carry out an analysis of</p>	This Action Plan was adopted publicly by CONAFA members and is intended to guide their activities in the long-term. CONAFA also adopted a template, developed by the Project, to monitor progress in the implementation of its Action Plan. This monitoring template distributes activities amongst Special Anti-Corruption Prosecutors and allows them to identify deliverables and results of each of the ten objectives that CONAFA has committed to in the medium and long-term. Furthermore, all CONAFA member institutions appointed operational level staff to support

	<p>types of corruption crimes, as defined by each state’s Criminal Code, as a first step toward standardizing the description of these in the Criminal Code. Additionally, CONAFA, with TRRP support carried out an event to present their results and follow up on their Action Plan.</p> <p>Development and approval of a Comprehensive Training Plan and corresponding syllabi covering topics identified as high priority, specifically regarding financial investigation, asset recovery, and the participation of private companies in corruption crimes.</p>	<p>the implementation of key actions items identified in their 2020 Action Plan.</p> <p>This working group continues to operate, maintaining constant communication and following up on CONAFA’s agenda, as established by CONAFA leadership, in addition to sharing information and resolving questions about investigation, jurisprudence and strategies to combat corruption.</p> <p>Regarding the Comprehensive Training Plan, CONAFA will seek support from international cooperation agencies or academic institutions with which it already has agreements in place, to carry out the priority training topics defined in conjunction with the TRRP. CONAFA member FECCs with particular expertise and experience in one of the defined topics will lead training efforts.</p>
<p><i>Red por la Rendición de Cuentas</i> (Accountability Network) – CIDE</p>	<p>Developed two new MOOCs with the goal of introducing government officials and the public to the SNA.</p>	<p>A number of government entities have adopted the MOOCs as part of their official training programs for public officials and CIDE has committed to maintain its operations for at least one more year without Project financial support.</p>
<p>GESOC</p>	<p>Implementation of a grant project to engage citizens in the monitoring of social programs related to the 2021 election cycle and the COVID-19 pandemic. GESOC trained and accompanied students in the application of its methodology to evaluate corruption risks in social programs in the following five states: Sonora, Coahuila, Chihuahua, Nuevo León and Jalisco. This initiative was implemented as part of the TRRP’s Small Grants Program.</p> <p>GESOC concluded a first phase of implementation in August 2021 and was awarded an extension to monitor additional social programs in Chihuahua,</p>	<p>Development of a tool for the identification of corruption risks in local social programs (<i>Identificación de Riesgos de Corrupción de Programas Sociales Locales</i> or HIRPROL for its acronym in Spanish). See https://hirprol.gesoc.org.mx/ for the full methodology and dashboard publicly displaying the results of the evaluations. Additionally, GESOC and local student organizations held meetings with respective state CPCs and Executive Secretariats of SEAs and entities that operate the programs,</p>

	Coahuila and Zacatecas through November 2021.	in order to present their results and recommendations to mitigate corruption risks.
Tec de Monterrey	Implementation of a grant initiative to create an Observatory of the National and State Anti-Corruption Systems in which the results of the institutions conforming these systems (SNA and II SEAs) are evaluated and feed an online dashboard, with a particular emphasis on corruption complaints, investigations, sanctions and asset recovery related to administrative offenses and acts of corruption.	Tec de Monterrey held trainings on its methodology and operation of the online platform with members of CPCs and interested civil society, with the objective that they will adopt the use of the Observatory and carry out periodic evaluations.
Chihuahua		
CC of Chihuahua's SEA	Contributed to the development of the 2020 Work Plan for the CC of Chihuahua's SEA. This document outlines the common goals and strategic priorities of the agencies that compose this body. The development of this product included consultation with local stakeholders in government, civil society, academia and the private sector, which served to collect their perceived priorities to curb corruption, followed by a working session with the members of the CC.	The resulting document is being implemented by the CC to: <ol style="list-style-type: none"> 1. Develop Chihuahua's state Anti-Corruption Policy; 2. Develop inter-institutional coordination mechanisms to enhance the impact of anti-corruption activities; 3. Develop protocols for interfacing with the National Digital Platform; 4. Issue guidelines to incorporate municipalities in the SEA; 5. Generate an effective communications strategy to sensitize the public about the work of the SEA, the CC, and its member institutions; and 6. Conduct other activities for the institutional consolidation of the SEA.
FECC	Revised and revamped a draft bill of the Institutional Law of FECC.	The Special Anti-Corruption Prosecutor submitted the bill to Chihuahua's Congress for review. Once this bill is passed into law, it will represent an important step toward achieving the financial and technical autonomy of Chihuahua's FECC.
Judicial Council	Began providing coaching and technical assistance to increase the resolution of internal administrative proceedings against alleged corrupt government officials in the state's judicial branch.	The Judicial Council is documenting and is expected to formalize the adoption of the innovations that its staff is proposing to expedite the resolution of administrative

		proceedings against alleged corrupt judges and other judiciary staff.
CC of Chihuahua's SEA	Prepared a draft project to advocate for the adoption of reforms to two key pieces of local legislation aimed at mitigating corruption risks (the Municipal Code and the Urban Development Law)	Upon completing the proposed reforms, the CPC and local CSOs will promote their passage by the state Congress.
SFP	Conducted a diagnostic of the auditing functions of this Ministry and began drafting standards and flowcharts to document all their internal audit procedures.	Upon completing the process to revamp their internal audit procedures, the Ministry will formalize their adoption into its internal regulations.
Coahuila		
<i>Consejo Cívico de las Instituciones de La Laguna (CCIL)</i>	Development of a dashboard to monitor and evaluate municipal OICs in the state of Coahuila. CCIL carried out a review of the processes of municipalities of Matamoros, Saltillo and Torreon, applying 95 indicators under a methodology to measure transparency, accountability, citizen participation and operational performance. CCIL carried out this initiative under the TRRP's Small Grants Program.	The methodology, developed by CCIL, will be promoted by the CPC of Coahuila so that other CSOs may apply and replicate this exercise in other municipalities in the state. Similarly, the Commission to Integrate Municipalities in Local Anti-Corruption Systems of the National Network of CPCs expects to share this project with CPCs across the country.
CPC and Executive Secretariat of Coahuila's SEA	Began developing a project, to be implemented in coordination with a local CSO, aimed at providing recommendations to set up and/or strengthen the operations of municipal OICs based on a diagnostic of shortcomings and needs.	The CPC and the Executive Secretariat of the CPC of Coahuila will assist in promoting the adoption of the recommendations resulting from the subject diagnostic.
Nuevo León		
Specialized Chamber in Administrative Responsibilities of Nuevo León's TJA and the State Supreme Audit Institution	Co-organized a workshop on Administrative Responsibility Procedures in the SNA. A total of 41 public officials from the organizing institutions participated in the training, along with representatives of the Executive Secretariat of the SEA, Nuevo León's State Transparency and Access to Information Commission, the State Comptroller's Office, and the President of the TJA's Specialized Chamber in Administrative Responsibilities.	Local counterparts were encouraged to distribute course materials and, when feasible, include participants in these courses that could replicate them with the support of other government officials from the participating institutions.
Quintana Roo		
State Supreme Audit Institution of Quintana Roo (ASEQROO)	Participation in the first wave of 100-Day Challenges in the operational teams to increase the resolution of administrative offenses as well as the team to increase the number of charges pressed and probable	The 100-Day Challenge methodology includes a Sustainability Workshop in which operational teams identify innovations with the objective of

	<p>cause rulings in cases of criminal corruption.</p> <p>In Y5 ASEQROO participated in a second wave of 100-Day Challenges, as part of the team working to increase the number of charges pressed in cases of criminal corruption, based on audit findings, as well as the team working to increase the resolution of criminal and administrative responsibility procedures, derived from Administrative Execution Procedures.</p> <p>The institution also developed, in coordination with the TRRP, Corruption-Investigation Guidelines for the adequate implementation of forensic investigation strategies that support the identification and gathering of evidence for administrative offenses and criminal corruption crimes.</p>	<p>sustaining, consolidating and increasing the results achieved during the Challenges. These innovations are shared with SEA leadership, along with a sustainability plan for their approval.</p> <p>The Corruption Investigation Guidelines were developed in conjunction and collaboration with ASEQROO staff in order to encourage their ownership over its contents and continued application. The TRRP also carried out a training with ASEQROO auditors to explain its contents and resolve any questions about its practical application.</p>
Bios	<p>Implementation of an initiative to monitor corruption risks in tourism development projects with environmental impact in the Riviera Maya and develop public policy proposals to mitigate the risks identified. This project was implemented as part of TRRP's Small Grants Program.</p>	<p>Bios developed a microsite where the results of the evaluations can be publicly accessed. They also carried out a rally (public competition) with local students and interested civil society, who participated in training on Bios' methodology to analyze corruption risks in such projects. The organization also held working sessions with relevant authorities to present the results of these evaluations and proposals to mitigate corruption risks in tourism development projects with environmental impact.</p>
CC of Quintana Roo's SEA	<p>Began implementation of the 100-Day Challenge methodology to work in collaboration with private sector organizations, academic institutions and civil society toward achieving goals that demonstrate ambitious, tangible and relevant results in preventing, investigating and sanctioning corruption crimes.</p>	<p>The institutional members of the SEA of Quintana Roo will assist in formalizing the adoption of the innovations developed as part of the 100-Day Challenges aimed at revamping their procedures to investigate and sanction corruption.</p>
Sonora		
CC of Sonora's SEA	<p>Began implementation of the 100-Day Challenge methodology to work in collaboration with private sector organizations, academic institutions and</p>	<p>The institutional members of the SEA of Sonora will assist in formalizing the adoption of the innovations developed as part of</p>

	civil society toward achieving goals that demonstrate ambitious, tangible and relevant results in preventing, investigating and sanctioning corruption crimes.	the 100-Day Challenges aimed at revamping their procedures to investigate and sanction corruption.
FECC of Sonora	Drafted a report to assess compliance of Sonora’s state legislation with international conventions against corruption.	Sonora’s FECC will utilize the results of this diagnostic to promote legal reforms aimed at strengthening the local legal framework against corruption.
State Supreme Audit Institution of Sonora (ISAF)	Support in the design and organization of training activities for ISAF personnel in topics relating to administrative responsibilities, in the framework of the new Administrative Responsibilities law; investigating cases of criminal corruption; and forensic auditing with the objective of strengthening investigative work within the institution. In Y5, ISAF developed, in coordination with the Project, a Forensic Auditing Manual for the proper implementation of investigation strategies that support the identification and gathering of evidence toward the prosecution of administrative offenses and criminal corruption crimes.	The Forensic Auditing Manual was developed in collaboration with ISAF leadership with the objective of establishing their ownership over the product and ensuring its sustained use. ISAF published the Manual in the <i>Diario Oficial del Estado</i> (journal where laws are published), formalizing and requiring its use.

LESSONS LEARNED

Carry out activities in states with the political will, apt conditions, and the opportunity for sustainability whilst remaining flexible to explore other opportunities: While the TRRP continually assessed conditions for carrying out activities in target states, these conditions were subject to change for a variety of reasons, often political. TRRP updated its PEA on an annual basis by interviewing key actors on the anti-corruption agenda to guide future programming. However, federal, state, and local politics, as well as the anti-corruption agenda changed constantly. TRRP also explored opportunities to carry out technical assistance in non-target states, which resulted successful in Zacatecas and Guanajuato, where two rounds of 100-Day Challenges were carried out.

Good practices in carrying out 100-day challenges: Carrying out two back-to-back Challenges resulted in some important lessons. Firstly, the innovations need time to mature between Challenges. Staff also need time in between these time-demanding Challenges to assimilate innovations, especially those not directly involved in Challenge activities. Even if they are formalized within the institution, they do not necessarily take root in a short time. Secondly, an ample Discovery Phase is needed prior to every Challenge, even if a Challenge has recently taken place with the same institutions in the same state. Several election processes and resulting transition of personnel left many Challenge participants in the second round in Quintana Roo feeling uncertain about their roles within the Challenges, and more importantly, in their jobs. In Zacatecas, a person in an important role was phased out of their position after local elections, leaving a significant gap in the Challenge team.

Using a local systems approach combined with tailored technical assistance and co-creation leads to greater ownership over products and capacities developed with SEA institutions:

TRRP strove to apply USAID's Local Systems Approach wherever possible over the course of technical assistance activities with state-level counterparts. The overarching benefits of this approach became particularly evident in the last year of the Project via the 100-Day Challenge methodology, which offers a structured journey for frontline teams (operational level staff) and the heads of their agencies/organizations (leaders) to enable intense collaboration, continuous innovation, and fast, yet disciplined execution. Based on Discovery Phase findings (a key phase of the methodology whose objective is to identify the actors, challenges and agendas of each local system), a variety of actors (CSOs, academia, chambers of commerce, etc.) are encouraged to participate in the Challenges. Leveraging inputs from a variety of perspectives, organizations and institutions has proven beneficial toward attaining results that are tangible and relevant to the local system, in addition to individual entities.

TRRP's experience with 100-Day Challenges allowed it to apply these lessons to other areas of technical assistance, capturing the spirit of the Local Systems approach in other areas of technical assistance. Specifically, the TRRP learned to adapt its approach based on the particular system, tailoring activities to the specific needs and objectives of the counterpart. By articulating the Local Systems approach and discovering the needs of the institution in question led to more effective technical assistance and training and more sustainable products that will have a lasting impact beyond the life of the Project. For example, during the latter half of FY 2020 the TRRP used a co-creation strategy in Chihuahua to propose reforms to the Municipal Code and Urban Development Laws. A variety of counterparts, including Chihuahua's CPC and local CSOs (*Mesa Estado de Derecho*, *Regidor MX* and *Plan Estratégico Juárez*), as well as the Inspector General Offices of Chihuahua and Ciudad Juárez were involved in the development of the proposal. The same CSOs helped push it through the state legislature for final approval, with the reforms passing in October 2021.

As another example, during the latter half of FY2021, the TRRP collaborated with the State Supreme Audit Institution of Sonora (ISAF) to develop a Forensic Auditing Manual, working closely with ISAF personnel to in its development. The TRRP interviewed ISAF auditors to discover the concrete objectives and ultimate purpose of this product in order to tailor it exactly to the needs of the institution and its public officials. The resulting Forensic Auditing Manual is the first of its kind in Mexico and served as the basis of a more in-depth TRRP training. This co-creation strategy was particularly successful with the ISAF, who have begun to promote it among other ASEs in the northern region of Mexico. In October 2021, upon the request of the ASE of Tamaulipas (and without any USAID intervention), ISAF personnel used this manual to conduct a training in forensic auditing. The Forensic Auditing Manual was also published into Sonora's state law in September 2021, formalizing its sustained use beyond the life of the Project.

Engaging local actors drives forward commitments by local governments to combat corruption: A cross-cutting theme across several Project components is the importance of engaging local actors and supporting the development of multi-actor coalitions, especially in technical assistance activities and grant implementation. Several TRRP grantees engaged local CSOs and other actors toward implementing their initiatives. For example, Bios engaged with a variety of CSO representatives, local businesspeople, academics, and journalists in its citizens' rally, a multi-day event in which Bios presented its methodology and gathered the opinions and inputs of each of these actors toward developing a public policy proposal to identify and mitigate corruption risks in tourism development projects with environmental impact in Quintana Roo. Each of these actors brought a variety of perspectives to this proposal. This led the municipalities of Benito Juárez and Cozumel to adopt Bios' methodology and implement the public policy proposal for making the process for approving licenses and permits for these types of projects more transparent. Quintana Roo's Institute for Transparency also participated in the development of the public policy proposal and is currently working toward meeting with transparency units in all of Quintana Roo's municipalities to make similar commitments.

Another example from the Project's Small Grants Program comes from GESOC, who implemented an initiative to detect and mitigate corruption risks in social programs. GESOC leveraged the support of local CSOs and student groups from the states where these social programs were evaluated. Similarly, to Bios, GESOC achieved commitment by the public entities responsible for implementing these programs, to adopt their recommendations to reduce corruption risks and make their programs more transparent.

RECOMMENDATIONS FOR FUTURE PROGRAMMING

The following offer a selection of recommendations by TRRP for future programming. Many of the lessons learned and recommendations based on good practices and opportunities will be integrated into the USAID/ProIntegridad project also implemented by Dexis.

- **Optimize methodologies to ensure their adaptability to virtual or in-person formats.** As noted in Lessons Learned/Challenges, the transition from in-person to online back to in-person formats for many activities, especially the 100-Day Challenges, presented a variety of obstacles. Unknown, future conditions of the pandemic and/or other unforeseen events may force Program activities to switch back and forth between hybrid and virtual settings, necessitating fluid transitions between modes of technical assistance.
- **Take measures to ensure the quality of work during such conditions and adjust contracts to reflect significant changes in methodologies and working dynamics accordingly.** Many changes of working dynamics took place over the course of the pandemic, and TRRP and its contractors (e.g., RRI) responded to them as best as they could given the uncertain nature of working conditions. However, many factors changed, as did methodologies, particularly the roles and responsibilities of TRRP and RRI within the framework of the 100-Day Challenges. While each party's ability to adapt to circumstances is to be praised, these changes should be reflected in writing, preferably via formal contract amendments.
- **Integrate the gender perspective as a formal component to Project activities.** While the Project took into account the gender balance among activity participants, the gender perspective was not integrated into TRRP programming. The team recommends implementing best practices in gender inclusion, as well as applying a gender perspective to anti-corruption programming (as is usually done in criminal justice programming). Counterparts often noted that USAID uses somewhat outdated terminology in terms of gender and lacks the ability to implement practices that incorporate a broader definition of inclusion and diversity. In order to apply more updated practices and strategies for applying the gender perspective, inclusion and diversity, the TRRP recommends hiring specialists or expert consultants in this subject matter area to better manage these concepts and integrate them into future programming for the advantage of all USAID beneficiaries.
- Similarly, while the TRRP and its contracting entities **engaged in training on sexual harassment and discrimination in the workplace**, the TRRP recommends offering this resource (or similar) to its counterparts, contractors and grantees, as a measure to ensure that they have access to adequate information, protocols and training, to better comply with minimum standards of conduct and avoid any potential risks to USAID.
- **Develop a broader, more continuous vision of grant programs and their ultimate objectives.** The TRRP's Small Grants Program resulted in the execution of excellent products and innovations; however, without a long-term vision by the donor, their sustainability is at risk. Rather than engaging grantees to develop initiatives or products with short shelf-lives, TRRP recommends employing grantees as more of an implementing partner to achieve long-term USAID

objectives through innovation rather than for the development tools that are difficult to be sustained without continuous support.

Annex A. Performance Indicator Tracking Table (PITT)

Project Overall Objective: Facilitate the implementation of the SNA and standardize the corresponding legal framework at the state level by means of strengthening interinstitutional coordination mechanisms, enhancing GOM capacities and CSO engagement to prevent, investigate and penalize corruption more effectively.

#	Indicator	Base Y2016	Y2017				Y2018				Y2019				Y2020				Y2021				Y2022				2017 - 2022		
			Target	Actual	Total Y1	% adv.	Target	Actual	Total Y2	% adv.	Target	Actual	Total Y3	% adv.	Target	Actual	Total Y4	% adv.	Target	Actual	Total Y4	% adv.	Target	Actual	Total Y4	% adv.	Target	Actual	% adv.
1	Number of legislative and/or procedural reforms to bring Federal and/or State legal framework into compliance with the SNA.	0	2	Q1 Q2 Q3 1 Q4	1	50%	3	Q1 2 Q2 Q3 Q4 2	4	133%	2	Q1 Q2 Q3 1 Q4 1	2	100%	2	Q1 Q2 Q3 Q4	0	0%	1	Q1 Q2 1 Q3 Q4	1	100%	0	Q1 1 Q2 Q3 Q4	1		10	9	90%
2	Number of USG-assisted CSOs that participate in legislative proceedings and/or engage in advocacy with national or state legislature and its committees	0	4	Q1 Q2 Q3 14 Q4	14	350%	2	Q1 1 Q2 Q3 Q4 1	2	100%	2	Q1 1 Q2 2 Q3 1 Q4	4	200%	4	Q1 Q2 Q3 Q4	0	0%	3	Q1 3 Q2 Q3 Q4	3	100%	0	Q1 Q2 Q3 Q4	0		15	23	153%
3	Number of USG supported anti-corruption measures implemented (national)	0	9	Q1 Q2 Q3 1 Q4	1	11%	4	Q1 1 Q2 3 Q3 4 Q4 1	9	225%	3	Q1 4 Q2 Q3 2 Q4	6	200%	4	Q1 2 Q2 Q3 1 Q4	3	75%	1	Q1 Q2 3 Q3 Q4 2	5	500%	1	Q1 1 Q2 1 Q3 1 Q4	3		22	27	123%
4	Number of CSOs assisted	0	4	Q1 Q2 Q3 24 Q4 12	36	900%	11	Q1 9 Q2 12 Q3 2 Q4 1	24	218%	15	Q1 24 Q2 4 Q3 18 Q4 14	60	400%	29	Q1 11 Q2 Q3 5 Q4	16	55%	8	Q1 9 Q2 3 Q3 7 Q4 1	20	250%	4	Q1 4 Q2 Q3 Q4	4		71	160	225%
5	Number of CSOs receiving USG assistance engaged in advocacy interventions	0	4	Q1 Q2 Q3 Q4 14	14	350%	5	Q1 4 Q2 2 Q3 Q4	6	120%	2	Q1 2 Q2 1 Q3 6 Q4 2	11	550%	14	Q1 Q2 Q3 Q4	0	0%	4	Q1 9 Q2 3 Q3 6 Q4 1	19	475%	2	Q1 3 Q2 Q3 Q4	3		31	53	171%
6	Number of government officials receiving USG-supported anti-corruption training	0	236	Q1 Q2 Q3 112 Q4 543	655	278%	740	Q1 23 Q2 433 Q3 223 Q4 49	728	98%	750	Q1 271 Q2 1360 Q3 4240 Q4 5954	11825	1577%	3600	Q1 3415 Q2 2491 Q3 930 Q4 1259	8095	225%	3000	Q1 1382 Q2 3354 Q3 2708 Q4 3718	11162	372%	600	Q1 2037 Q2 Q3 Q4	2037		8,926	34,502	387%
7	Number of people affiliated with NGOs receiving USG supported anti-corruption training	0	135	Q1 Q2 Q3 50 Q4 223	273	202%	370	Q1 21 Q2 210 Q3 41 Q4 100	372	101%	175	Q1 84 Q2 311 Q3 4372 Q4 3174	7941	4538%	1000	Q1 58 Q2 219 Q3 248 Q4 519	1044	104%	800	Q1 360 Q2 603 Q3 817 Q4 1422	3202	400%	200	Q1 854 Q2 Q3 Q4	854		2,680	13,686	511%
8	Number of USG supported anti-corruption measures implemented at the subnational level	0	3	Q1 Q2 Q3 9 Q4	9	300%	10	Q1 2 Q2 12 Q3 2 Q4	16	160%	4	Q1 2 Q2 1 Q3 10 Q4 4	17	425%	9	Q1 1 Q2 Q3 1 Q4	2	22%	7	Q1 4 Q2 1 Q3 11 Q4 2	18	257%	4	Q1 4 Q2 Q3 Q4	4		37	66	178%
9	Number of governing and executive units of the SNA and State Anticorruption Systems established and operating with USAID support	0	NA	Q1 Q2 Q3 Q4	0		14	Q1 3 Q2 20 Q3 5 Q4 1	29	207%	14	Q1 35 Q2 6 Q3 10 Q4 10	61	436%	38	Q1 47 Q2 Q3 1 Q4	48	126%	23	Q1 10 Q2 25 Q3 20 Q4 8	63	274%	24	Q1 41 Q2 Q3 Q4	41		113	242	214%
10	Number of innovations in place to prevent, investigate and penalize corruption more effectively.	0	NA	Q1 Q2 Q3 Q4	0		3	Q1 Q2 Q3 2 Q4	2	67%	3	Q1 Q2 1 Q3 Q4 1	2	67%	8	Q1 Q2 Q3 Q4 1	1	13%	7	Q1 11 Q2 9 Q3 13 Q4	33	471%	6	Q1 6 Q2 Q3 Q4	6		27	44	163%

Breakdown of Training Indicators by Gender

#	Indicator		Base Y201 6	Y2017			Y2018			Y2019			Y2020			Y2021			Y2022			2017 - 2022		
				Target	Actual	% adv.	Target	Actual	% adv.	Target	Actual	% adv.	Target	Actual	% adv.	Target	Actual	% adv.	Target	Actual	% adv.	Overall target	Actual	% adv.
6	Number of government officials receiving USG-supported anti-corruption training	W			346			295		6,831		4,690		5,820		1,182								
		M			308			433		4,994		3,405		5,336		854								
		Other			1			0		0		0		6		1								
		Total	0	236	655	278%	740	728	98%	750	11,825	1577%	3,600	8,095	225%	3,000	11,162	372%	600	2,037	340%	8,926	34,502	387%
7	Number of people affiliated with NGOs receiving USG supported anti-corruption training	W			120			203		5,338		567		1,465		491								
		M			152			169		2,603		477		1,731		363								
		Other			1			0		0		0		6		0								
		Total	0	135	273	202%	370	372	101%	175	7,941	4538%	1,000	1,044	104%	800	3,202	400%	200	854	427%	2,680	13,686	511%

Annex B: Success Stories

The following is a list of the success stories prepared by the TRRP and attached here:

1. Chihuahua Raises the Bar for Anti-Corruption Legislative Reform in Mexico
2. Collaboration is Key to Strengthening Special Anti-Corruption Prosecutors' Offices
3. Sonora's Application of Forensic Auditing Standards Yields Positive Results and Scales Up to Other States
4. Massive Open Online Courses Prepare Mexico's Government Officials to Carry Out their Mandate under the National Anti-Corruption System
5. Corruption Sentence Sparks Culture Shift among Public Officials in Sonora
6. Jalisco Special Anti-Corruption Prosecutor's Office Produces Visible Results through 100-Day Challenges
7. 100-Day Challenge Methodology Instill Tools for Achieving Lasting Change in Jalisco's State Anti-Corruption System
8. 100-Day Challenge Methodology Boosts the Performance of Coahuila's State Anti-Corruption System
9. Social Programs Under the Magnifying Glass of Young Activists in Mexico
10. Citizens Engage in Public Policy Development to Mitigate Corruption Risks & Protect the Environment



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SUCCESS STORY

Chihuahua Raises the Bar for Anti-Corruption Legislative Reform in Mexico

USAID supports the reform process to create Chihuahua's State Anti-Corruption System, which now serves as an example for other states.



Photo: TRRP

Working session with CSO and private sector representatives in Chihuahua.

“The coaching support that the Project provided was very useful in helping the Chihuahua CPC define a next steps road map for fully integrating the Committee and executing its priority tasks such as the selection process of the Chihuahua SEA’s Technical Secretary. The parallel training workshops that were organized were also useful in getting all participants up to speed in our understanding of the SNA and the SEA.”

Jose Enriquez, head of the Chihuahua CPC and President of the Chihuahua SEA

Mexico’s Congress passed a federal law on July 18, 2016, that ushered in a series of reforms to help prevent and address corruption across the country by creating an Anti-Corruption System (known by its Spanish acronym SNA). Given Mexico’s federal system of government – in which each of its 31 states has its own state-level legal framework – the federal law gave states until July 18, 2017 to adapt their existing state laws to the standards of the national law and to create new state laws as necessary.

Many Mexican states began this process immediately, working throughout 2016 and early 2017 to pass reforms to their respective state constitutions and create new laws for the establishment of state anti-corruption systems. But one state in particular lagged behind: the northern border state of Chihuahua, which had much to do to catch up to its peers.

In early 2017, USAID’s Transparency and Rapid Response Project (TRRP) stepped in to help the state of Chihuahua. The TRRP helped form a committed team of civil society and private sector representatives who were keen to see progress in the fight against corruption in their state. These groups teamed up to form the *Mesa de Estado de Derecho* (Rule of Law Committee), with the idea that they would have far greater capacity to advocate before the state congress as a united group, rather than operating independently of each other.

Members included the private sector organizations FICOSEC (Trust for Competitiveness and Citizen Security) and CODECH (Council for Economic Development of Chihuahua). The Project worked with these groups to review existing and proposed legislation, and provided technical opinions on bills being considered by the state congress to amend the constitution and create a state anti-corruption system. This assistance helped to inform and bolster the groups’ advocacy efforts and to ensure that the proposed changes met the standards set by the SNA.

In addition to its work with civil society, the Project also worked directly with state legislators involved in the reform process. Having worked in various other states implementing the SNA, the Project was able to provide invaluable perspective and bring expertise from across the country. Traces of the Project’s constructive contributions can be



Top: Announcement for an event in Chihuahua related to the National Anti-Corruption System.

Bottom: Workshop for the Mesa de Estado de Derecho in Chihuahua.

The revamping of a state anti-corruption legal framework is a complex task that requires a diverse group of dedicated actors, committed to pushing these reforms across the finish line.

found throughout the anti-corruption legal framework in Chihuahua with countless Project recommendations being incorporated into the new laws – including state constitutional amendments, the State Anti-Corruption System Law and the State Public Procurement Law.

The Project’s technical assistance ensured that the new legislation met the legal standards of the SNA. Indeed, the Project’s assistance often meant that the new laws in Chihuahua exceeded those standards, thus allowing Chihuahua – the state that at one point lagged behind its peers – to serve as an example for other states throughout the country. For example, Chihuahuan laws require that its Citizens Participation Committee and Selection Committee maintain gender balances in their membership. Furthermore, and at the urging of FICOSEC, an independent tribunal was created for resolving cases of administrative corruption, thus allowing for streamlined, efficient processes for responding to public-sector corruption in Chihuahua.

The procedure to create the State Anti-Corruption System Law of Chihuahua in particular was carried out through an open parliamentary process, meaning actors from various sectors – such as the executive branch, state congress, civil society and the private sector – all collaborated in a participatory and inclusive manner. This successful mechanism is indeed being replicated in the review of other state laws.

The Project’s success in supporting the initial, critical adjustments to the state’s legal framework has allowed Chihuahua to become an example of good practice referenced across the country. Furthermore, Chihuahuan officials have approached the Project to support in the review of additional bills aimed at implementing the state anti-corruption system, such as the Institutional Law of the State Administrative Court, the Administrative Justice Law, the Institutional Law of the Executive Branch, and the Transparency and Access to Information Law, a process which is underway. This gives the state yet more opportunities to raise the bar for best practice across Mexico.



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SUCCESS STORY

Collaboration is Key to Strengthening Special Anti-Corruption Prosecutors' Offices



Meeting of the National Association of Special Anti-Corruption Prosecutors in Hermosillo, Sonora (December 4-5, 2018)

"USAID really understands our problems, they have helped us visualize the path ahead. They can see that supporting Special Anti-Corruption Prosecutors' Offices is critical and what it means for the Mexican State and society."

*-Odracir Espinoza, CONAFA
President and Sonora's Special Anti-Corruption Prosecutor*

Responding to a national public outcry to combat corruption and impunity, constitutional reforms in 2016 created the National Anti-Corruption System in Mexico, followed by State Anti-Corruption Systems. Special Anti-Corruption Prosecutors' Offices, established both at the federal and state levels, are called to serve a fundamental role in the operation of these systems, by investigating and prosecuting alleged corruption offenses.

While each Special Anti-Corruption Prosecutor's Office faces its own unique problems, within politically-charged contexts, they all cope with common challenges. That is where USAID's Transparency and Rapid Response Project (TRRP) comes in. The Project saw the opportunity to help these institutions join together and find a collective voice to push for legal and procedural reforms aimed at overcoming common hurdles. Starting in October of 2018, the TRRP began working closely with Special Anti-Corruption Prosecutors' Offices to collect and categorize the obstacles they face. This work culminated in a 10-point action plan intended to address these challenges, presented at the annual meeting of the National Association of Special Anti-Corruption Prosecutors (CONAFA) on December 4-5, 2018 in Hermosillo, Sonora.

Several of these action items are specifically aimed at gaining full autonomy. Most Special Anti-Corruption Prosecutors' Offices in Mexico are currently dependent upon Attorney's General Offices for human, financial, material and other resources. In practice, this limits the Special Anti-Corruption Prosecutors' Offices decision-making power and ability to properly investigate and prosecute corruption crimes.

The TRRP's close working relationship with Odracir Espinoza, Sonora's Special Anti-Corruption Prosecutor and CONAFA's president, is key in this collaboration. The TRRP is providing extensive support to the Special Anti-Corruption Prosecutors Office in Sonora, developing protocols based on international best practices in investigating and prosecuting corruption crimes. Mr. Espinoza's objective as CONAFA's president is to create solid institutions and believes Sonora can serve as a pilot state for these protocols toward the development of a national, standardized model for Special Anti-Corruption Prosecutors' Offices.



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CONAFA and the movement to strengthen the autonomy of Special Anti-Corruption Prosecutor's Offices is getting its legs. In August 2019, with Project support, the Mexican Employers' Association (COPARMEX), the main private-sector organization behind the creation of the SNA, pledged to work together in promoting the technical and financial independence of these institutions.

Mr. Espinoza is hopeful about the future of Special Anti-Corruption Prosecutor's Offices. "Although it's only been a year, I think we have come a long way. We are just getting started and it is really important that USAID continue to support us in our consolidation."



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SUCCESS STORY

Sonora's Application of Forensic Auditing Standards Yields Positive Results and Scales Up to Other States

USAID helps the State Supreme Audit Institution of Sonora build capacities and develop Mexico's first-ever Forensic Auditing Manual.



ISAF personnel participate in a Forensic Auditing workshop in September 2021.

“We believe we that this country can change. With the help of USAID, ISAF is pushing in the right direction toward a culture of responsibility and the capacity carry out public service correctly.”

*- Karla Beatriz Ornelas Monroy,
Auditing Director at the State Supreme
Auditing Institution of Sonora (ISAF)*

State-level Supreme Audit Institutions (ASEs) in Mexico are responsible for performing external audits of state and local government agencies. However, most of these institutions lack the obligation and authority to incorporate forensic auditing procedures into regular financial audits of public accounts, unless it is requested by a higher government authority. Even then, state-level auditors are unlikely to have the knowledge to apply these advanced procedures.

This was certainly the case in Sonora, where the State Supreme Audit Institution (*Instituto Superior de Auditoría y Fiscalización- ISAF*) was in need of specialized materials and training. To address this, since 2018, USAID's Transparency and Rapid Response Project (TRRP) has supported ISAF by providing technical assistance and specialized training in topics ranging from the General Law of Administrative Responsibilities to compiling investigation files, and, more recently, on forensic auditing.

Karla Beatriz Ornelas Monroy, the Auditing Director at ISAF, has participated in USAID-sponsored trainings on these topics. “USAID trainings have changed the way I work,” she reflected. “As a public servant, who is not an auditor by trade, having trainers with such a depth of knowledge but also the capacity to contextualize examples and help you put them into practice has been key in my own professional development.”

Ms. Ornelas is one of many ISAF personnel who have participated in USAID-sponsored trainings over the life of the TRRP. But the relationship between the Project and ISAF goes beyond workshops and capacity-building exercises. The TRRP's most recent technical assistance focused on co-creating a Forensic Auditing Manual to provide ISAF with specific auditing tools and techniques. Once the Manual was completed, TRRP experts led an in-depth training on its usage for the ISAF auditing team. The Manual came into legal force in Sonora's *Diario Oficial*, where laws are published, on September 20, 2021.

“Since we have had the Manual, which is the first of its kind for ASEs in Mexico, and been able to implement these procedures, we have had great results,” commented Ms. Ornelas, who reported that auditors in Sonora now know where to direct their efforts when red flags arise. For example, “we always knew to investigate the winners of public procurement bids, but we never looked at the losers and that is when things started to get interesting.” Thanks to forensic auditing procedures, ISAF auditors now review bidders' files in public procurement



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bids by cross-referencing databases of other government institutions. This method allows them to search for patterns among public servants involved in each tender and the companies that bid on it.

As a result of these audits, the Special Anti-Corruption Prosecutor's Office is now investigating at least five formalized complaints of serious administrative offenses against bidders that provided false documentation. For example, ISAF recently discovered an offeror who provided false documentation of MXN \$89 million pesos (about USD \$4.45 million) collateral in a bid for a government contract to provide ventilators in response to the COVID-19 pandemic. If that company were to default on its contract, the taxpayers would have had to cover those funds.

This co-creation strategy has impacted not only the ISAF, but other ASEs. Jesús Ramón Moya Grijalva, ISAF's General Director, leads the northern division of the Federal Auditing System (ASF), a regional consortium of ASEs of in Sonora, Baja California, Chihuahua, Coahuila, Nuevo León and Tamaulipas. The northern division of the ASF gathers regularly to share success stories, practical tools and innovations under development. In a recent encounter, Mr. Moya shared the development of the ISAF's Forensic Auditing Manual with the other ASEs. Tamaulipas was the first to show interest in the Manual and related training. The very next week ISAF auditors led a workshop for the ASE of Tamaulipas, based on the Manual and the training they recently received from the TRRP team.

With the recent publication of the Manual and subsequent approval as law, Ms. Ornelas and Mr. Moya expect that other ASEs will approach the ISAF and request similar support in adapting the Manual to the institutions' particular needs, as well as training.

“We have received amazing support from USAID over the past few years which has allowed us to develop a well-prepared team. ISAF employees show great commitment to integrity and transparency and we are sure that these tools and capacities developed will continue to show positive results and we will keep growing.”

***- Jesús Ramón Moya Grijalva,
General Director of ISAF***

October 2021



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SUCCESS STORY

Massive Open Online Courses Prepare Mexico's Government Officials to Carry Out their Mandate under the National Anti-Corruption System



MOOC Launch Event in Mexico City on November 26, 2018

"I think Mexico can change its culture of corruption. The State Anti-Corruption Systems and this type of education are the way to make that change. I believe that the USAID-developed MOOC is the most successful course on corruption topics in Mexico and I am very proud to have been part of its development and dissemination."

Román Méndez, President of Guanajuato's Citizen Participation Committee

In July 2016 a sweeping-set of anticorruption reforms was signed into law, creating Mexico's National Anti-Corruption System (SNA). This mechanism is meant to coordinate the efforts of public servants at all levels of government (federal, state and municipal) to prevent, investigate and prosecute corruption more effectively and under the watchful eye of civil society representatives.

A crucial first step to attain these objectives is building the capacity of the actors involved by developing their basic understanding of how this complex system is meant to operate and how they are to fulfil these new responsibilities. But whether it is time or money, finding resources to train public servants nationwide is often a significant barrier, especially when a diverse set of actors are being introduced to a new topic. This was one of many challenges that arose upon the initial implementation of the SNA and its homologous mechanisms at the state level (State Anti-Corruption Systems or SEAs): public servants, members of civil society organizations (CSOs) and other stakeholders had little knowledge on how these systems would operate, what each actor's responsibilities would be and how they would interact under the new legal framework. Traditional on-site capacity-building activities, while important can only cover a very small proportion of the population in need of SNA-related training, which is estimated at close to five million public servants.

Seeing the need to broaden basic anti-corruption training, USAID's Transparency and Rapid Response Project (TRRP) joined forces with the Center for Economic Research and Teaching (CIDE) and its Accountability Network (*Red por la Rendición de Cuentas*) to develop a virtual online training platform. The resulting Massive Open Online Course (MOOC) platform, available at <http://mooc.rendiciondecuentas.org.mx/>, rolled out in November 2018. The platform includes, to date, two modules on basic anti-corruption concepts and an introduction to the SNA. The two modules can be completed in about four hours, similar to a conventional, in-person training. However, the course can be completed at users' own pace and public servants are not necessarily pulled away from their regular responsibilities for long periods of time.



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Staff of Sonora's State Supreme Auditing Institution are recognized for completing the MOOCs on June 3, 2019 in Hermosillo

Recognizing a low early adoption rate and course completions, in 2019 the TRRP knew its projected goal of 6,000 participants within the MOOC's first year was falling short. To boost participation, it looked toward a broader dissemination strategy and began to target public officials and representatives of CSOs, academia, and media through meetings, public events, written communications, and social media to publicize the MOOCs and encourage their incorporation in official training programs. For instance, in early 2019 the Project and CIDE presented the MOOC to 25 state CPCs at the third meeting of the National Network of CPCs in Mexico City.

Collaboration with state CPC has been key to the success in promoting the courses. Román Méndez, President of Guanajuato's CPC recognized the role of the TRRP's virtual courses in supporting the implementation of SEAs: "Obviously, the benefit of this online training approach is that it can efficiently reach a much wider audience. Most people, including many public servants, do not even realize what corruption is and what constitutes a corruption crime. It is deeply ingrained in the culture and everyday practices. Education is the basis for changing habits and that is how we can start changing this culture of corruption in Mexico."

Intensive collaboration with the CPC in Guanajuato resulted in an agreement with the SEA's Coordinating Committee to incorporate the MOOC as part of their required general training program for all staff. This and similar collaboration schemes with other state CPCs has proved extremely successful to exceed the MOOC's intended targets. As of September 27, 2019, around 32,000 individuals had enrolled in the two available modules, and 23,626 had completed them. Not only did the Project reach 394% more completions than the original goal, but the training was delivered at a fraction of the cost of conventional, in-person classroom workshops. The online MOOC training costs an estimated \$2.60 USD per participant, while the same information presented via conventional training costs an estimated \$100 USD. Developing and presenting the training online allowed the Project to reach a high number of participants at a much lower cost, greatly expanding the knowledge needed by public servants, civil society and academia to effectively participate in combatting corruption in Mexico.



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SUCCESS STORY

Corruption Sentence Sparks Culture Shift among Public Servants in Sonora



State Anti-Corruption System operators develop work plans to tackle impunity in public service during the Launch Session of the 100-Day Challenges in Sonora (February 10-11, 2020).

“Word has gotten out that OICs are doing their job and now public servants are taking their obligations seriously.”

-Omar Tiburcio, Director of the OIC of Sonora’s SAGARPA

“In the past, at least at the local level, misuse of government resources went unpunished. Nothing ever really happened if you were found doing something you should not as a public servant,” says Ricardo García, President of Sonora’s Court of Administrative Justice (TJA for its acronym in Spanish). Historically, most corruption cases filed before the TJA failed to conclude with a sanction. This was largely the result of a limited understanding of the standards of proof by Internal Audit Units (OICs for its acronym in Spanish), the entities responsible for investigating and processing this type of cases in Court.

To address this pervasive impunity, USAID’s Transparency and Rapid Response Project (TRRP) worked in coordination with the entities that compose the State Anti-Corruption System of Sonora, including the TJA, the State Comptroller’s Office, and the State Supreme Audit Institution, to increase the resolution of corruption offenses by applying the 100-Day Challenge methodology. 100-Day Challenges assist in achieving ambitious, tangible, and relevant results by breaking down barriers of communication and inspiring coordination amongst institutions and their personnel to ultimately pursue systemic and sustainable change.

In the framework of the 100-Day Challenges, TJA judges and representatives of OICs met to discuss the standards needed to build a strong case. The OIC of Sonora’s Secretariat of Agriculture and Rural Development (*Secretaría de Agricultura y Desarrollo Rural- SAGARPA*) had the opportunity to put its new legal strategies into action when a number of complaints about the misuse of a SAGARPA vehicle came to its attention via social media. Omar Tiburcio, Director of SAGARPA’s OIC noted, “There was no awareness among public servants about their responsibilities [to avoid utilizing government property for their personal benefit]. This is an issue that affects government entities across the state.”

In this particular case, as a result of an administrative process initiated before the TJA, the public servant was found guilty of misusing government resources (a vehicle) and was suspended from his position for 15 days. At first this may seem like a mere slap on this wrist, but it actually had a much larger impact.



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“The real punishment is not the 15-day suspension, but 15 days with no salary.” For a mid-level government employee, 15 days less pay makes a significant impact, according to Ricardo García.

For García, what followed was a sign of a much larger impact beyond this one particular public servant. “It was the first time we sentenced and applied a punishment for a serious administrative offense. This is a complete paradigm shift in Sonora. Although there is a statewide regulation regarding the use of government vehicles, there was very little control and misuse was rampant. Magically, after this sentence was issued, all of the [SAGARPA] vehicles are now parked where they were supposed to be at the time they are supposed to be there.”

That is why Ricardo García says “There is no small sentence. You can see the impact of this sentence in the day-to-day behavior of public servants.” He is also convinced that the best way to fight corruption is increase efficiency in public service and firmly believes that this sentence hit home with many government workers.

Clearly this is resonating at the local level. Omar Tiburcio is proud to say that reports of misuse of government vehicles have fallen drastically, and not just within SAGARPA. “Word has gotten out that OICs are doing their job and now public servants are taking their obligations seriously.” He also noted that through the process of reaching this resolution, the OIC’s relationship with the State Comptroller’s Office and TJA has improved significantly, particularly in their ability to coordinate actions and achieve results by working together.

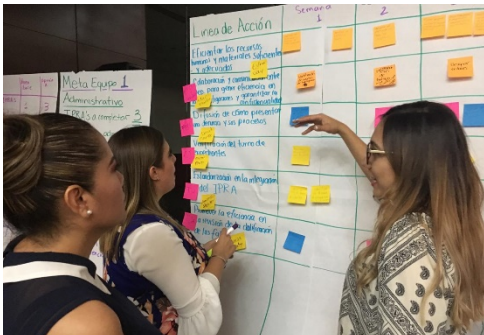
“This type of sentence can transform efficiency in public service,” according to Ricardo García. Gaining the coordination of the system to apply the law in one seemingly small case has had a ripple effect on the culture of public servants in Sonora—an impact far greater than a 15-day suspension.



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SUCCESS STORY

Jalisco's Special Anti-Corruption Prosecutor's Office Produces Visible Results through 100-Day Challenges



Prosecutors, auditors and representatives of civil society organizations work together in developing a work plan to tackle high-level corruption cases through the 100-Day Challenge methodology.

"We've seen a change in how people think. Now we try to figure out how to solve problems, rather than doing it the way it has always been done, waiting for forms and orders to be signed and passed down. Now we are able to carry out more proactive investigations."

*María Eugenia Flores Chávez,
Advisor to Jalisco's Special Anti-Corruption Prosecutor*

Since the establishment of Jalisco's Special Anti-Corruption Prosecutor's Office in early 2018, the office had pressed charges in only a few corruption cases. This newly established institution was just starting to find its legs when USAID's Transparency Rapid Response Project offered to help it implement the 100-Day Challenge Methodology and quickly achieve tangible and relevant results visible to the public.

Public servants from institutions comprising Jalisco's State Anti-Corruption System, including the Special Anti-Corruption Prosecutor's Office, formed teams to tackle two different challenges: one to increase the number of charges pressed in relevant corruption cases, and another to more effectively complete reports of administrative responsibility. Coincidentally, during the challenge period the Special Anti-Corruption Prosecutor's Office received a number of high-profile cases that attracted international attention. Among them was the disturbing *Trailers de la Muerte* scandal involving irregularities in the state's purchase of refrigerated trailers to store bodies while their deaths were being investigated.ⁱ Another involved the purchase of overpriced medications by Jalisco's State Pension Service.ⁱⁱ

As these high-profile cases came under international scrutiny, failure was not an option. The Special Anti-Corruption Prosecutor's Office dove headfirst into the 100-Day Challenge's premise of achieving ambitious goals by radically changing the rules, roles, relationships and resources within the system. Participants started by identifying their biggest challenge: a lack of effective communication between SEA institutions. So, they looked for ways to collaborate and communicate across multiple SEA institutions, rather than focusing on the work within their individual institution. This also presented a new opportunity for local civil society organizations to actively participate in a joint effort with SEA actors. "The Challenge brought all the players together for the first time and opened up new channels of communication that didn't exist before," according to María Eugenia Flores Chávez, coordinator for the team responsible for increasing the number of charges pressed as a result of corruption investigations and the right-hand to Jalisco's Special Anti-Corruption Prosecutor.



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With deep knowledge of the institution and closely monitoring each step of the Challenge, Ms. Chávez saw how this methodology helped to transform the way the institution works within the short, 100-day timeframe. She and others on her Challenge team also experienced directly how this methodology encourages innovation and opens the door to changing the unwritten rules of the system. Mexican institutions are notoriously bureaucratic and rely on a hierarchy that slowly issues orders from the top down. This is no longer the case in Jalisco's Special Anti-Corruption Prosecutor's Office. "We've seen a change in how people think. Now we try to figure out how to solve problems, rather than doing it the way it has always been done, waiting for forms and orders to be signed and passed down. Now we are able to carry out more proactive investigations," says Ms. Chávez.

This team also sought to change relationships with the other institutions they work with. Prior to the challenge SEA institutions in Jalisco were working in an isolated fashion with little understanding of how the other works, or what their needs are. "We are criminal lawyers, and they are auditors and administrators. We had no idea how the others work," according to Ms. Chávez. That is, until they held roundtable discussions between the Special Anti-Corruption Prosecutor's Office and the State Comptroller's Office, not only to work on the cases included in the Challenge but also to gain a better understanding of the other institutions. "Now we understand how our work impacts the other, and vice versa, and that has allowed us to actually work together."

Ms. Chávez' team had an initial goal of bringing charges in four cases but exceeded that goal by successfully bringing charges in 10 cases in 100 days, including the *Trailers de la Muerte* and State Pension Services cases. While case resolutions and sentencing could take months or even years, the achievements of the Challenge did not stop after the 100 days were over in September 2019. Since that time, the Special Anti-corruption Prosecutor's Office has brought charges in other relevant cases of criminal corruption, signaling that this institution is well on its way to consistently achieving sustainable, long-term results.



A Sustainability Workshop marked the end of the 100-Day Challenges in Jalisco on September 25, 2019.

ⁱ <https://www.elimparcial.com/mexico/A-un-ano-del-trailer-de-la-muerte-en-Guadalajara-que-ha-pasado-con-el-caso-20190916-0001.html>.

ⁱⁱ <https://www.informador.mx/jalisco/Vinculan-a-proceso-a-seis-por-presunto-fraude-en-lpejal-20190703-0002.html>.



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SUCCESS STORY

100-Day Challenge Methodology Instills Tools for Achieving Lasting Change in Jalisco's State Anti-Corruption System



State Anti-Corruption System operators and leaders engage in inter-institutional roundtable discussions.

“The 100-Day Methodology is what really got us to go beyond our goal of resolving four cases of serious administrative offenses, and really led us to deeper conclusions about the way we work.”

-José Ramón Jiménez, President of Jalisco's Court of Administrative Justice

“Never in the history of the state of Jalisco have representatives of the SEA institutions sat down together at the same table to solve common problems,” according to José Ramón Jiménez, President of Jalisco's Court of Administrative Justice (TJA for its acronym in Spanish), the institution responsible for resolving cases of serious administrative offenses by public servants. The SEA in Jalisco is relatively new, having only launched its operations in July of 2017. The institutions that comprise it (the state Special Anti-Corruption Prosecutor's Office, the Supreme Audit Institution, the Inspector General's Office and the TJA, among others) had never come together to collaborate toward concrete activities and materialize their mandate of working together to curb corruption.

USAID's Transparency and Rapid Response Project (TRRP) brought SEA leaders together to define the objectives of 100-Day Challenges to combat corruption in the state. 100-Day Challenges assist in achieving ambitious, tangible, and relevant results by breaking down barriers of communication and inspiring coordination amongst institutions and their personnel to ultimately pursue systemic and sustainable change. In Jalisco, the SEA leaders established two goals for the challenge: to increase the number of charges pressed in relevant corruption cases, and to more effectively complete reports of administrative offenses. These are not simple tasks given the lack of communication among SEA institutions, lack of trust among public servants, and lack of transparency in procedures.

Over the course of these 100 days, the team tackling administrative responsibilities leveraged two of the hallmarks of the Challenge methodology: opening channels of communication and finding the root cause of systemic problems. They did this, in part, through a series of inter-institutional roundtable sessions, inviting the participation of representatives from all levels of SEA institutions, from directors and justices to clerks and administrators.

“At first, we only thought about accelerating the resolution of cases of administrative offenses. But being able to sit down with all these different institutions, we were able to have an open and respectful dialogue about deeper legal and organizational deficiencies. The 100-Day methodology is what really got us to go beyond our goal of resolving four cases of serious administrative offenses, and really led us to deeper conclusions about the way we work.”



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Not only did this team achieve more than double its goal by resolving a total of nine cases of serious administrative offenses, these inter-institutional roundtable discussions were the impetus for the development of several innovations, whose utility has already transcended the 100-Day Challenges.

Based on the results of the roundtable discussions, the team tackling administrative corruption, led by José Ramón Jiménez, carried out a diagnostic assessment of human and material resources needed to file complaints of corruption offenses. Their efforts revealed the need to streamline processes and pinpoint where improvements can be made. This subsequently led to the development of a Manual for Filing Corruption Complaints, along with a single, standardized form for filing either administrative or criminal corruption complaints—a significant, collaborative effort among SEA institutions that was completed in May 2020.

The roundtables also uncovered some serious deficiencies in how cases of administrative offenses were being investigated and reported, ultimately bringing about impunity among public servants at the local level. This discovery sparked the development of a guide for completing reports of administrative offenses. This guide, created mainly for the staff of Internal Audit Units of state-government entities, is intended to correct common mistakes and deficiencies in the handling of administrative responsibility procedures.

Beyond the tangible results of the Challenges in Jalisco, José Ramón Jiménez reports that “the 100-Day Challenges planted a seed of change among SEA operators. They are now open to participation with other institutions. The relationship among us has improved. I see a distinct shift in how we confront problems. This professional respect and mutual understanding that we achieved in the roundtable discussions is bearing fruit.” Leveraging the tools of creative thinking, collaboration, and innovation offered by the 100-Day Challenge methodology has made these changes possible.



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SUCCESS STORY

100-Day Challenge Methodology Boosts the Performance of Coahuila's State Anti-Corruption System



Sustainability Session marking the end of Coahuila's 100-Day Challenges on July 2, 2019

"The challenge has also helped to elevate the profile of the Judicial Council. State Court employees and public servants in other institutions are seeing our progress and are realizing that we are organized and working hard to combat corruption."

- *Perla Najera Corpi, Court Clerk in Coahuila's Judicial Council*

Perla Najera Corpi plays an important role in Coahuila's State Judicial Council. As a Court Clerk, she makes sure that Judicial Council mandates are effectively executed. This is a critical job in an institution responsible for making sure the State Court provides justice services in an efficient and ethical fashion. But she recently took on an even greater challenge to help the Judicial Council unravel red tape and innovate more efficient processes to combat corruption.

Coahuila's State Judicial Council is one of six agencies that form part of the State Anti-Corruption System's (SEA), formed in 2017. It performs key functions to hear and resolve alleged administrative corruption violations by State Court employees. This is key to gaining the trust of society and building confidence in public institutions. However, the Judicial Council ability to carry out proceedings of alleged cases of administrative corruption was lackluster, only resolving 47 of these cases in all of 2018.

Under pressure to respond to citizen's demand to fight impunity in Mexico and improve public opinion on the credibility of Coahuila's SEA, the Judiciary Council worked with USAID's Transparency and Rapid Response Project (TRRP), other members of the Coahuila SEA and local stakeholders (i.e., civil society organizations and academia) to jointly implement a rapid results methodology aimed at boosting its ability to adjudicate administrative corruption crimes in a more expeditious manner. The rapid results methodology¹ provides a space and tools for operators to come together as a local system, rather than as independent agencies, to work together to innovate new ideas toward achieving a common objective over the course of 100 days.

The TRRP supported two operating teams, formed by staff from the agencies that make up Coahuila's SEA, the state Citizen Participation Committee (CPC) and local civil society organizations over the course of their 100-Day Challenges between March and June 2019.

¹ This methodology was developed by the Rapid Results Institute (RRI) and was implemented in Mexico in collaboration with this organization.



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Perla Najera was part the operating team whose goal was to increase the resolution of serious and non-serious administrative corruption offenses within the institutions that form the SEA of Coahuila and led this work specifically within the judicial branch. Knowing the ins and outs of the Judicial Council, she was key in conceptualizing and carrying out each of the innovations that led to her team's success. "We knew our processes were inefficient. But the 100-Day Challenge methodology gave us the space to come together and identify these bottlenecks and implement the tools to start overcoming them."

The rapid results methodology clearly worked for this team. While they set an initial goal of resolving 35 cases in about 100 days, they nearly doubled that number, resolving 66. This is an impressive increase of 842% over the same period in 2018. Ms. Najera believes that each of the innovations helped the team achieve and surpass their goal, but she did name two in particular that were fundamental in improving efficiency and simplifying overly bureaucratic processes. First, videotaping hearings to present evidence in cases of alleged administrative corruption, rather than having a stenographer transcribe them, greatly reduced hearing times. For example, a complex hearing involving five or more witnesses would require at least 12 hours to be completed and transcribed. Hearing times have now been cut by 83%, to about two hours by eliminating the use of a transcriptionist. During the challenge, the team also implemented a new process for carrying out hearing notices directly from the Judicial Council. Previously, notices had to go through a number of lower district courts to be delivered, in some cases taking up to two months. Now, hearing notices are delivered within a week.

These are not short-term changes. These process improvements are being considered for inclusion into the State Court's Institutional Law, formalizing their use and ensuring their long-term sustainability. These efficiency gains are also being noticed by other institutions and public servants. "The challenge has also helped to elevate the profile of the Judicial Council. State Court employees and public servants in other institutions are seeing our progress and are realizing that we are organized and working hard to combat corruption."

For Ms. Najera this has not only been a professional transformation but also a personal one. "I used to feel hesitant sometimes when facing a challenge. Looking back on these 100 days, it is much easier to visualize the whole picture, and reaching a goal does not seem so difficult once you know what the path is and the steps you need to take to get there. Then once you start seeing the results, it motivates you to keep going."

Since the formal end of the challenge, Ms. Najera reports that the Judiciary Council continues to use the rapid results approach and the innovations her team implemented. They have even maintained the same rhythm of case resolutions and have adopted this way of working as the new norm. Indeed, from the end of the challenge on June 25 to August 22, 2019 the Judicial Council resolved over 30 cases of administrative corruption.

Ms. Najera and her team are not stopping there. "We keep thinking about what we can continue to improve. This newfound efficiency is helping us gain society's trust. People are seeing a response. They do not feel like their complaints fall on deaf ears and they are actually filing more complaints. Even though our workload is increasing, society is noticing that we are responding to the call to combat corruption crimes within government institutions."



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SUCCESS STORY

Social Programs Under the Magnifying Glass of Young Activists in Mexico

USAID sub-grantee GESOC evaluates corruption risks in social programs – and generates youth interest in civic oversight.



GESOC’s website features the methodology to detect corruption risks in social programs and the results of this initiative.

“Apathy is contagious. With GESOC, we learned what citizen participation really is, and now we have the tools to dig into these matters.”

Student from the Tec de Monterrey who participated in GESOC’s corruption risk evaluations

The COVID-19 crisis in Mexico generated the need for urgent government programs to address the social and economic crisis – but the urgent nature of this spending can lead to increased opacity and irregular processes, which in turn increase the risk of corruption. Ensuring appropriate use of public funds requires strong civil society oversight of government spending in order to demand accountability, identify potential corruption risks, and propose ways to reduce them.

In this framework, USAID’s Transparency Rapid Response Project (TRRP) is funding an initiative implemented by the local organization GESOC to reduce corruption risks in public programs meant to address the economic and social effects of the COVID-19 crisis.

With TRRP support, GESOC developed a methodology to identify corruption risks in local social programs (HIRPROL for the acronym in Spanish), based on the application of 60 variables across 6 categories: budget, operations, registry of beneficiaries, citizen participation, auditing and evaluation.¹ GESOC engaged the participation of local student groups from various campuses of the *Instituto Tecnológico de Estudios Superiores de Monterrey* (Tec de Monterrey) to carry out the evaluations, and trained over 50 students in the methodology. With GESOC mentoring, the students then researched publicly available information and engaged with the authorities responsible for operating the social programs – ranging from economic, nutrition and medical support, to targeted care for the elderly and disabled – to request information toward feeding these indicators.

The results of these variables give an indication of each program’s compliance with transparency standards on a stoplight-style scale. GESOC considers 70% compliance as not having significant corruption risks. The tool also signals where there are red flags



for corruption risks. Based on these red flags, the students prepared presentations to the authorities that operate these social programs on the results of their evaluations and provided recommendations to mitigate these risks.

¹ For a full explanation of the methodology and results, see GESOC’s website <https://hirprol.gesoc.org.mx/>

In addition to identifying corruption risks, GESOC’s unique methodology of training student researchers was designed to generate youth knowledge of – and interest in – public oversight. A common theme expressed by the student participants was that they learned how to actively participate in demanding accountability from their own government. One student commented, “I learned the importance of monitoring the government and letting public servants know that we are watching them.” In the words of another student, “Through this exercise I was able to do something rather than complain about the government and corruption. With GESOC’s tool we can understand what is happening at different levels of government and whether those actions are appropriate. Now we have the ability to investigate, although the information is not always easy to find. **But we can do something and that is power.**”

With the support of these student groups and other CSOs, GESOC surpassed the initial goals of the program, evaluating 14 social programs in six states – and is currently implementing a second phase of the program to evaluate additional social programs in Zacatecas, Coahuila, and Chihuahua. The table below shows the social programs evaluated to date, by state and their scoring in each of the six key categories:

Tabla 3.			Porcentaje de áreas de riesgo de corrupción					
Entidad	Responsable	Programa	Presupuesto	Operación	Patrón	Participación ciudadana	Fiscalización	Evaluación
Chihuahua	Estudiantes	Programa alimenticio adultos mayores	60.00%	51.72%	33.33%	100.00%	33.33%	100.0%
Coahuila	OSC	Apoyo a las familias coahuilenses	75.00%	61.29%	55.56%	90.00%	100.00%	100.0%
Coahuila	Estudiantes	Pa que te quedes en casa	100.00%	65.52%	66.67%	80.00%	100.00%	100.0%
Coahuila	Estudiantes	Acción comunitaria	60.00%	64.29%	77.78%	100.00%	100.00%	100.0%
Jalisco	OSC	Fuerza Mujeres	62.50%	26.92%	22.22%	60.00%	100.00%	0.0%
Jalisco	Estudiantes	Jalisco por la nutrición	50.00%	33.33%	33.33%	80.00%	0.00%	0.0%
Nuevo León	Estudiantes	Programa de Inclusión para Mujeres Jefas de Familia	50.00%	48.39%	55.56%	70.00%	66.67%	0.0%
Nuevo León	Estudiantes	Apoyo Alimentario Covid-19	100.00%	43.75%	20.00%	80.00%	100.00%	100.0%
Nuevo León	Estudiantes	Aliados contigo	62.50%	51.61%	88.89%	90.00%	33.33%	100.0%
Nuevo León	Estudiantes	Apoyo de medicamentos covid-19	60.00%	74.19%	70.00%	100.00%	100.00%	100.0%
Querétaro	Estudiantes	Por tu alimentación	60.00%	40.00%	60.00%	80.00%	100.00%	100.0%
Sonora	Estudiantes	Becas laborales para personas con discapacidad	80.00%	68.00%	50.00%	90.00%	66.67%	100.0%
Sonora	OSC	Programa Emergente de Seguridad Alimentaria (PESA)	37.50%	44.44%	33.33%	80.00%	100.00%	100.0%
Sonora	Estudiantes	Programa Emergente Covid-19	80.00%	73.91%	33.33%	100.00%	100.00%	100.0%

GESOC successfully secured commitments from local authorities toward implementing recommendations aimed at improving transparency in these programs. For example, the Citizen Participation Committees of the State Anti-Corruption Systems of Chihuahua, Sonora and Nuevo León committed to implementing the HIRPROL methodology as part of their respective State Anti-Corruption Policies.

With the implementation of local-led initiatives such as GESOC’s, USAID helps promote public demand for accountability and transparency in Mexico.



USAID
FROM THE AMERICAN PEOPLE

SUCCESS STORY

Citizens Engage in Public Policy Development to Mitigate Corruption Risks & Protect the Environment

USAID sub-grantee Bios identifies corruption risks in tourism development projects and convenes stakeholders to develop public policy recommendations.



Caption

“This is a first step in better evaluating our political representatives. Bios’ methodology allows us to identify the gaps in the system that can lead to corruption. This helps us all become more informed about the use of our resources and understand how we can prevent corruption and monitor the development of these projects that affect the communities where we live.”

- Daniel Saa, local businessperson and interested citizen

The Mexican state of Quintana Roo is home to a vast and fragile biodiversity, and the state’s economy depends largely on tourism. However, high rates of corruption often put these two elements at odds, given that economic tourism development without oversight represents an obstacle to protecting the environment.

In response, USAID’s Transparency Rapid Response Project is funding an initiative implemented by the local organization *Bios: Participación Política y Desarrollo* to identify and prevent corruption risks related to the approval process and implementation of tourism development projects with potential environmental impacts in Quintana Roo. Bios’ hypothesis centers around the idea that the processes for approval, administration, and operation of tourism development projects are unclear and unstandardized among the different levels of government (municipal, state and federal). Bios’ first step was to untangle the web of existing information, identify data gaps, and make these processes easier to understand and accessible to the public. They first carried out an exercise to map these processes at the federal and state level, and conducted further research into the even vaguer procedures at the local level in 10 municipalities comprising the Riviera Maya tourist zone in Quintana Roo, including Cancún.

Once Bios clarified the local processes, they then worked to identify the corruption risks in these processes. The Bios [webpage](#) displays these risks categorized by municipality, along with an analysis of several key tourism development projects with environmental impact in the state.

In August and September of 2021, Bios engaged a variety of actors from local government, civil society, academia and general public to participate in civic roundtable discussions (or *Jornadas de Dialogo Ciudadanos* in Spanish) toward generating recommendations to mitigate corruption risks in these types of projects. Over the course of three days, 20 CSO representatives, municipal and state tourism authorities, academics and various other stakeholders gathered in a virtual setting to learn about Bios’ methodology and findings from 10 evaluations of tourism development projects with environmental impacts. Participants also engaged in discussions to generate viable and strategic solutions to form a public policy proposal that takes into account the different perspectives.

Participants were motivated to join the civic roundtable discussions for a variety of reasons but most emphatically to actively participate in



the matters that concern them. Daniel Saa, a local businessperson and interested citizen, said he wanted to “to participate in tools to rethink the way we act as citizens and public servants in Mexico and offer up a new way to do things correctly and sanction responsible parties when rules are not followed. Bios’ tool allows us to evaluate our government and inform ourselves about the use of our resources.” Randy Bastarrachea de León from the State Institute for Public Access to Information and Personal Data Protection (IDAIP) and Coordinator for Open Government and Proactive Transparency wanted to “search for a way to support those working in benefit of society, whether they be citizens, activists or public servants themselves.”

Moreover, Dr. Elisa Guillén, an academic from the Technological Institute of Cancún, reflected that “in this country we need to carry out these projects in a transparent way, avoid illegal activities, and above all, make sure that these projects do not have adverse effects on our society and local environment.” Enrique Burton, who works with Quintana Roo’s College of Public Administration and Political Science, is also a local environmental activist. He commented that citizens know that these tourism development projects are vital for economic development but when they are not implemented according to law, the negative social and environmental consequences render them unsustainable. For him, “having this information systematized so that citizens can understand with certainty the institutional elements that need to be analyzed and be able to follow up on them was the most useful part of these discussions.”

This innovative co-creation approach, incorporating a variety of stakeholder perspectives, allowed Bios to compile the recommendations into a public policy proposal. Fabián Carvalho, a journalist and environmental activist, reflected that “this multidisciplinary approach is key to working as a team. We have no time to lose in involving all actors to obtain results that are optimal for our community and our planet.”

As a result of this public policy proposal, Bios, with IDAIP support, has secured the commitment of the municipalities of Cozumel and Benito Juárez (i.e. Cancún), two influential economic districts, to adopt this methodology as a monitoring and evaluation tool and implement the resulting recommendations. Bios and IDAIP will continue to present the methodology to incoming municipal government administrations and gain their buy-in towards adopting this powerful tool.

Main Elements of Bios’ Public Policy Proposal

*1. Increase availability of information about licenses, permits and authorizations at the municipal level to generate **proactive transparency** and comply with Quintana Roo’s Law for Regulatory Improvement. With this information, citizens can actively engage in monitoring processes.*

*2. **Strengthen the technical capacity of public servants** involved in the permitting and evaluation of these projects through the development of a formal civil service career program and continuous training and period performance reviews.*

*3. **Maximize the publicity and transparency in public tenders** and conformation of committees, commissions and collegial entities related to the participation and approval of public policy, as it relates to environmental matters. Put a spotlight on and involve citizens in monitoring these processes.*

A short video about the development of Bio’s Public Policy Proposal through the citizen roundtable discussions can be viewed [here](#).

Annex C: List of Host Country, International Donor, and Financial Institution Contact and Collaboration

Type of Institution / organization	Name
National government	<ul style="list-style-type: none"> • CONAFA • SESNA • INAI • SFP
State / municipal government	<ul style="list-style-type: none"> • Comptroller's Office of the municipality of Benito Juarez in Quintana Roo • Contraloría y Transparencia Gubernamental in Nuevo León • FECCs of Hidalgo, Michoacán, Tlaxcala Guanajuato, Chihuahua, Zacatecas, Quintana Roo, Sonora, and Jalisco • General Procurement Directorate of Nuevo León • Inspector General Offices (sindicaturas) in Chihuahua • Judicial Council of Chihuahua • Ministry of Transparency and Accountability in Guanajuato • Municipal Comptroller of León • Secretariat of Inspection and Accountability of Coahuila & Sinaloa • SFP of Coahuila & Chihuahua • State Supreme Audit Institutions of Chihuahua, Quintana Roo, Guanajuato, Sonora & Zacatecas
Civil society organizations	<ul style="list-style-type: none"> • ACA México • Acciones por los Derechos Humanos e Igualdad de Género • Alternativa, Tu Futuro Posible • Alzando Voces • Asociación Nacional Cívica Femenina (ANCIFEM) • Asociación Nacional de Abogados de Empresa • Arquimetría • Asociación Nacional de Abogados de Empresa • Avance y Desarrollo para la Igualdad • Ax Civil • Barra Mexicana Colegio de Abogados • Bios • Borde Político • Brújula Ciudadana • Centro Profesional Indígena de Asesoría, Defensa y Traducción A.C. • Ciudad y Naturaleza en Armonía • Ciudadanos Contra la Corrupción • Ciudadan@s por la Transparencia • Cívica Digital • Cómo Vamos Colima • Con Niños A.C.

	<ul style="list-style-type: none"> • Consejo Ciudadano de Vigilancia y Transparencia • Consejo Cívico de Instituciones de Coahuila • Consejo Cívico de Instituciones de Nuevo León A.C. • Consejo Cívico de las Instituciones de La Laguna (CCIL) • Consejo Nuevo León • Consejo OSC Sinaloa • Contraloría Ciudadana A.C. • Contraloría Ciudadana para la Rendición de Cuentas • Corrupción Cero • Eges para el Desarrollo • Ethos • Evolución Mexicana • Familia Digna A.C. • Federación de Colegios y Asociaciones de Abogados "José de Jesús Naveja" A.C. • Féminas A.C. (Tijuana) • Fideicomiso para la Competitividad y Seguridad Ciudadana (FICOSEC) • Fundación Saencar (Sonora) • Fundar, centro de investigación y análisis • Gobernanza, Desarrollo y Transparencia Institucional • GESOC • Hagámoslo Bien • Hermosillo Cómo Vamos • Hospital Civil de Culiacán • Ilustre y Nacional Colegio de Abogados de México • Incorruptible • Iniciativa Sinaloa • Instituto de Investigaciones Jurídicas UNAM • Instituto Mexicano de Auditoría Técnica • Instituto Mexicano para la Competitividad (IMCO) • Instituto Nacional de Ciencias Penales (INACIPE) • Instituto Ortega y Gasset • Instituto Sonorense de Administración Pública • Instituto Tecnológico y de Estudios Superiores de Monterrey • Inteligencia Pública • Isaac Everardo, A.C. (San Quintín) • Jalisco Cómo Vamos A.C. • Karewa • Ligalab Ideas que Unen A.C. • Licenciados en Ciencias Políticas y Administración Pública de Sonora, AC • Locallis • Mesa de Estado de Derecho • Mexicanos Contra la Corrupción y la Impunidad • México Evalúa
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	<ul style="list-style-type: none"> • Monitor Anticorrupción • Movimiento Amplio Sinaloense • Observatorio Ciudadano de Cajeme, AC (Sonora) • Observatorio Ciudadano de Mazatlán • Observatorio Ciudadano de Querétaro • Organización Juvenil México • Observatorio Permanente del Sistema Estatal Anticorrupción de Jalisco • Parlamento Ciudadana 29 • Plan Estratégico de Juárez • ProSociedad • Propuesta Ciudadana • Red Iberoamericana Pro Derechos Humanos (Tijuana) • Red por la Participación Ciudadana de Chihuahua • Red Nayarit • Regidor MX • Social TIC • Sonora Ciudadana • Tecate en Pie de Lucha, A.C. • Tierra Colectiva • Transparencia Mexicana • Transversal • Vertebra • Vigilancia Ciudadana (Tecate) • Vigilantes Ciudadanos por la Transparencia de Sinaloa • Wikipolítica
Multi-sectoral bodies	<ul style="list-style-type: none"> • CPC – National Network & Chihuahua/Sonora chapters • State Anti-Corruption Systems (SEAs)
Private sector	<ul style="list-style-type: none"> • Cámara Nacional de la Industria de Transformación (CANACINTRA) • Confederación Patronal de la República Mexicana (COPARMEX NL-Quintana Roo & Sonora Norte) • Cámara de la Industria de Transformación de Nuevo León (CAINTRA) • Cámara Nacional de Comercio, Servicios y Turismo Nuevo León (CANACO NL) • Consejo Coordinador Empresarial de Rosarito
Academia	<ul style="list-style-type: none"> • Academia de Contratación Pública de México • Academia de Ingeniería • Academia Mexicana de Auditoría al Desempeño • Centro de Investigación Económica y Presupuestaria • Centro de Investigación y Docencia Económicas (CIDE) • Colegio de Abogados de Nuevo León • Colegio de Bachilleres del Estado de Sonora, Cobach • Colegio de Jurisprudencia • Colegio de Contadores • Colegio de Criminólogos e Investigadores Forenses (Tecate)

	<ul style="list-style-type: none">• El Colegio de Sonora• Tecnológico de Monterrey Campus Santa Fe (Tec de Monterrey)• Universidad Autónoma de Chihuahua• Universidad Autónoma de Ciudad Juárez• Universidad Autónoma de Coahuila• Universidad Autónoma de Nuevo León• Universidad Autónoma de Sinaloa• Universidad Carolina• Universidad de Guadalajara• Universidad de Sonora• Universidad Kino• Universidad Metropolitana de Monterrey• Universidad Regiomontana• Universidad Vizcaya de las Américas
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Annex D: Table of Key Products

Name of Key Product	Link
MOOC, “National Anti-corruption System: the new regimen for administrative responsibilities and sanctions linked to corruption” & the introductory workshop	https://mooc.rendiciondecuentas.org.mx/
Free online course: public responsibility and combatting corruption	https://www.mooc.rendiciondecuentas.org.mx/etapa2/
Manual on the National Anti-corruption System and links to the National Transparency System	http://snt.org.mx/images/Doctos/informacion/estudios/manual_sna_snt.pdf
Anti-corruption Datathon 2018, 2019 and 2021	https://dataton2021.plataformadigitalnacional.org/ https://www.youtube.com/watch?v=HN7vdRXuyBI&t=1s https://www.youtube.com/watch?v=5fP-Ms0kxlg
Dashboard developed by CCIL for the evaluation and tracking of Internal Municipal Bodies in Coahuila, Zaragoza	https://www.oics.ccilaguna.org.mx/
Platform of the Observatory Mechanism of the National and State Anti-Corruption System by Tec de Monterrey	https://www.transparenciayanticorruptcion.mx/observatorio
Auditing processes for the SFP of Chihuahua in their corruption investigation and detection work	https://portalair.chihuahua.gob.mx/media/archivos/98592_Lineamientos-Auditoria-Forense.docx
Forensic Auditing Manual for ISAF	https://isaf.gob.mx/manuales-y-guias/
Evolution and Challenges of the Social Witness Program	https://www.gob.mx/sfp/documentos/evolucion-y-retos-de-la-figura-del-testigo-social
National Anti-Corruption Policy	https://www.sesna.gob.mx/politica-nacional-anticorruptcion/#:~:text=La%20Pol%C3%ADtica%20Nacional%20Anticorruptci%C3%B3n%20(PNA,de%20la%20corruptci%C3%B3n%20en%20M%C3%A9xico.
Reference guide on the subjects covered in the MOOC co-developed with CIDE, which offers infographics, charts, examples, and case studies	https://www.mooc.rendiciondecuentas.org.mx/etapa2/
Training manual for a six-hour course on the essential aspects of the SNA, covering topics such as the structure and functions of the SNA, the National Audit System, and the new Administrative and Criminal Liabilities for public officials and private citizens, co-developed with Ethos	https://www.ethos.org.mx/wp-content/uploads/2017/11/VersionFinal_Manual_SNA_ResponsabilidadesAdministrativasPenales_Ethos-I.pdf
Tool for Identifying Risks of Corruption of Local Social Programs (HIRPROL) developed by GESOC as part of the Citizen Surveillance Project in the	https://hirprol.gesoc.org.mx/

use of public resources in during the 2021 electoral process and the COVID-19 epidemic"	
Document, "Evolution and Challenges of the Social Witness program, resulting from technical collaboration carried out between the Secretariat of Public Function of the Federal Government"	https://www.gob.mx/sfp/documentos/evolucion-y-retos-de-la-figura-del-testigo-social
Observatory Portal for Tourism Projects with Environmental Impact developed by Bios as part of the Citizen Social Auditing Tourism Project.	https://sites.google.com/biospolitica.org/ojociudadanoturistico/ojo-ciudadano-al-turismo?authuser=3
Observatory of Anti-Corruption System of the Transparency and Anti-Corruption Initiative of Tec de Monterrey	https://www.transparenciayanticorrupcion.mx/observatorio