

# Transparency and Regulatory Oversight against Corruption. The Importance of the Federal Sanitary System in Mexico

*Transparencia y vigilancia regulatoria ante la corrupción. La importancia del Sistema Federal Sanitario en México*

## Carlos Alberto Aguilar Acosta

Head of the Sanitary Operations Commission of COFEPRIS  
[caguilar@cofepris.gob.mx](mailto:caguilar@cofepris.gob.mx)

## Alejandro E. Svarch

Head of the Federal Commission for Protection against of Sanitary Risks (COFEPRIS)  
[asvarch@cofepris.gob.mx](mailto:asvarch@cofepris.gob.mx)

## Jordi Enrique Velasco Bejarano

Executive Director of Programming and Performance Evaluation of COFEPRIS  
[jvelasco@cofepris.gob.mx](mailto:jvelasco@cofepris.gob.mx)

## Verónica Suárez-Rienda

Deputy Director of Social Research in Health of COFEPRIS  
[vsuarez@cofepris.gob.mx](mailto:vsuarez@cofepris.gob.mx)

## Joselin Garibay Arciniega

Verifier at COFEPRIS  
[jjgaribay@cofepris.gob.mx](mailto:jjgaribay@cofepris.gob.mx)



### Abstract

With the intention of strengthening the articulation of transversal actions in the protection against sanitary risks, COFEPRIS developed an innovative line of intervention called National Good Government Strategy in the Federal Sanitary System, which seeks to strengthen the prevention of possible acts of corruption, promote the values, the rules of integrity and ethics in public service in the areas for protection against sanitary risks. Its implementation was based on three corruption mitigation spheres, five specific objectives and five strategic axes that aim to fulfill the execution of 20 specific activities.



### Resumen

Con la intención de fortalecer la articulación de acciones transversales en la protección contra riesgos sanitarios, la COFEPRIS desarrolló una innovadora línea de intervención denominada Estrategia Nacional de Buen Gobierno en el Sistema Federal Sanitario, la cual busca fortalecer la prevención de posibles actos de corrupción, promover los valores, las reglas de integridad y ética en el servicio público en las áreas para la protección contra riesgos sanitarios. Su implementación se basó en tres esferas de mitigación de la corrupción, cinco objetivos específicos y cinco ejes estratégicos que tienen como propósito cumplir la ejecución de 20 actividades específicas.



**Keywords**

Regulation, strategy, government, corruption



**Palabras clave**

Regulación, estrategia, Gobierno, corrupción

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*Carlos Alberto Aguilar Acosta, Alejandro E. Svarch,  
Jordi Enrique Velasco Bejarano, Verónica Suárez-Rienda  
and Joselin Garibay Arciniega*

## Introduction

In countries such as Mexico, the decentralization of public institutions in different territorial demarcations has had the effect, rather than strengthening benefits for the population, of worsening problems such as corruption and a series of improper or illicit practices in public service, including, among others, the appropriation, abuse or misuse of public power by public servants or elected representatives to obtain personal benefits.<sup>1</sup> Corruption is a practice with two components: a public servant who abuses their position, and a person who promises or gives a benefit

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<sup>1</sup> Óscar A. Müller Creel, “La responsabilidad civil del servidor público en el combate a la corrupción,” in *Revista Mexicana de Ciencias Políticas y Sociales*, no. 214, January-April 2012, pp. 165-185, at <https://doi.org/10.22201/fcpys.2448492xe.2012.214.32523> (date of access: November 15, 2023); José Luis Estrada Rodríguez, Review of *La corrupción administrativa en México* by Jose Juan Sanchez Gonzalez, in *Polis*, vol. 9, no. 2, second half of 2013, pp. 179-184, at <https://www.redalyc.org/pdf/726/72630717007.pdf> (date of access: November 15, 2023); José Bautista-Farías, “La corrupción en México: cambios y alternativas,” in *Análisis Plural*, second half of 2017, pp. 114-127, at <https://rei.iteso.mx/server/api/core/bitstreams/a74b69b2-9d36-486b-83fd-89dd6ce659d5/content> (date of access: November 15, 2023); and Alejandro Pastrana Valls, “Estudio sobre la corrupción en América Latina,” in *Revista Mexicana de Opinión Pública*, no. 27, July-December 2019, pp. 13-40, at <https://doi.org/10.22201/fcpys.24484911e.2019.27.68726> (date of access: November 15, 2023).

in order to receive favorable treatment. Depending on the scope and nature of that relationship, the interactions that give rise to corrupt practices include bribery, corruption, collusion, acting under a conflict of interest, influence peddling or coercion.<sup>2</sup>

The causes of corruption can be subjective or objective, or external to the subject. Javier Miranzo Díaz considers the subjective causes to be the feeling of impunity (that is, the low perception of risk of being discovered and punished by participants in the act of corruption), the moral reinforcement of individualistic attitudes, and the loss of confidence in the public service. Objective causes have their origin in the weakness of legal frameworks (when bad practices tend to develop in greater numbers and with greater ease in those legislative systems that regulate acts of corruption in a lax and unclear manner) and in the weakness of institutional procedures and mechanisms.<sup>3</sup>

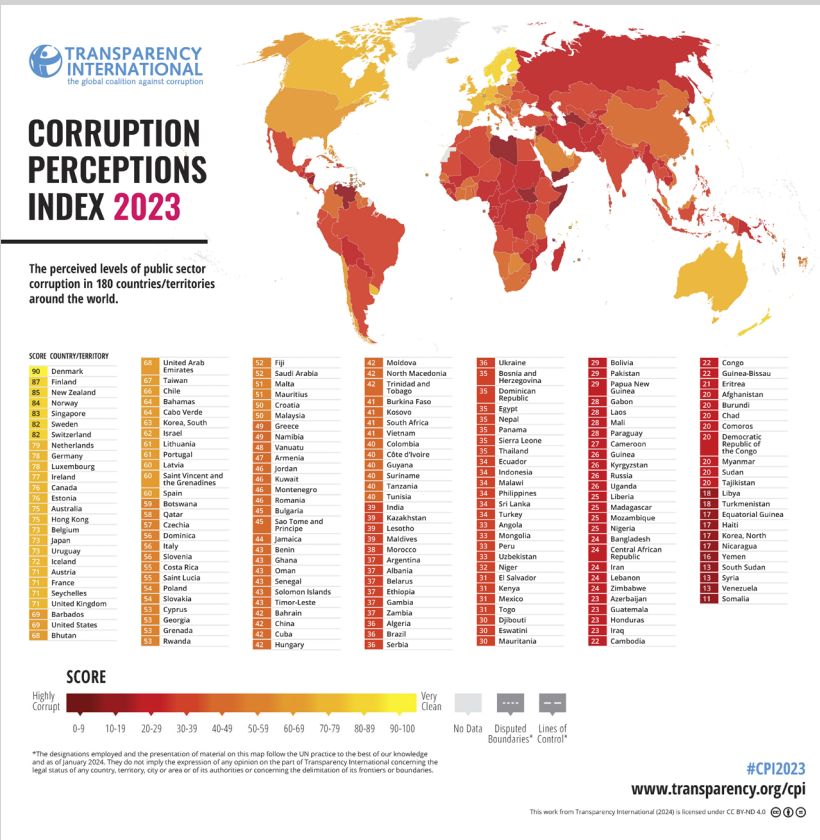
Transparency International's Corruption Perceptions Index (CPI) shows that, in 2023, the five countries with the highest perception of corruption worldwide are Somalia, South Sudan, Syria, Venezuela and Yemen (see Figure 1).

As shown in Figure 2, on the American continent 15 countries are considered among those with the highest perception of corruption, with the top three being Venezuela, Nicaragua and Haiti. In the Americas,

<sup>2</sup> Óscar Diego Bautista, *Ética pública y buen gobierno: Fundamentos, estado de la cuestión y valores para el servicio público*, Toluca, Instituto de Administración Pública del Estado de México, 2009, at <https://iapem.edomex.gob.mx/editorial/revistas/2009LEPBGFEVCVSP.pdf> (date of access: November 15, 2023); Juan Ángel Arroyo Kalis and Fernando Falconi Múzquiz, "La corrupción en México: percepciones y respuestas," in *Clivajes Revista de Ciencias Sociales*, no. 7, January-June 2017, pp. 27-49, at <https://clivajes.uv.mx/index.php/Clivajes/article/view/2384/4225> (date of access: November 15, 2023); Carlos Bustamante López, "La corrupción en México: un perfil de sus orígenes," in *Perspectivas*, no. 9, January-December 2017, pp. 13-40, at <https://revistas.unicomfacauc.edu.co/ojs/index.php/Perspectives/article/view/128/107> (date of access: November 15, 2023); and Alejandro Monsiváis-Carrillo, "Corrupción y legitimidad democrática en México," in *Revista Mexicana de Sociología*, year 82, no. 3, July-September 2020, pp. 587-618, at <http://dx.doi.org/10.22201/iis.01882503p.2020.3.58503> (date of access: November 15, 2023).

<sup>3</sup> Javier Miranzo Díaz, "Causas y efectos de la corrupción en las sociedades democráticas," in *Revista de la Escuela Jacobea de Posgrado*, no. 14, June 2018, pp. 1-26, at <https://www.jacobe.edu.mx/revista/numeros/numero14/1.Javier-Miranzo-Di%CC%81az-Causas-Efectos-Corrupcion-Sociedades-Democraticas.pdf> (date of access: November 15, 2023).

Figure 1. Global Corruption Perceptions Index, 2023



on the continent among countries perceived as corrupt, corruption is one of the most significant public problems since citizens perceive it as a frequent practice among public servants that undermines the economy, damages the social fabric and threatens the development of individuals, violating access to basic goods and services, including services related to protection against sanitary risks.<sup>5</sup> According to the Global Corruption Barometer: Latin America and the Caribbean (2019), one in three Mexicans admits to having had to pay a bribe to complete procedures and services, which is why Mexico has the second-highest number of reported bribes in the region.<sup>6</sup>

In the early 1980s, in response to the economic crisis and the austerity measures imposed by the International Monetary Fund and implemented by the government of Miguel de la Madrid, a federal administration model emerged which, although not consolidated until 1996, was principally aimed at reducing the functions of the welfare state to a minimum.<sup>7</sup> It was a model that favored privatization, deregulation and economic liberalization, embodied in strategies set out in the National Development Plan such as the decentralization of national life and of health services.<sup>8</sup>

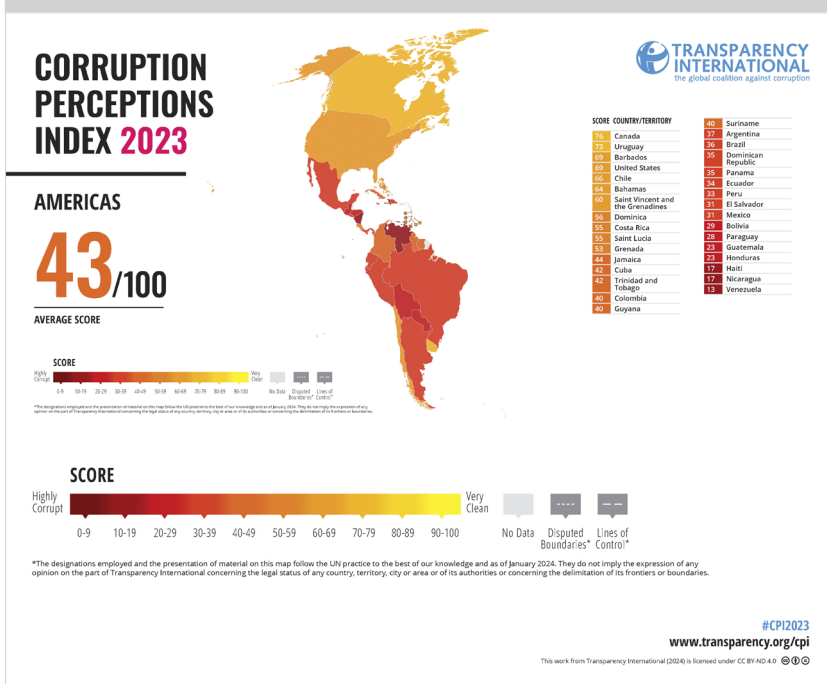
<sup>5</sup> Lina Manrique-Villanueva and Javier Eslava-Schmalbach, "Auscultando la corrupción en la salud en la salud: definición y causas. ¿Qué está en juego?," in *Revista Colombiana de Obstetricia y Ginecología*, vol. 62, no. 4, October-December 2011, pp. 308-314, at <https://www.redalyc.org/pdf/1952/195222507004.pdf> (date of access: November 19, 2023); Mario Ricardo Calderón Pinzón, "Corrupción y salud 3: desarrollo de liderazgo para transformar sistemas de salud," in *Revista Cubana de Tecnología de la Salud*, vol. 11, no. 4, October-December 2020, pp. 3-15, at <https://revtecnologia.sld.cu/index.php/tec/article/view/1913/1373> (date of access: November 19, 2023).

<sup>6</sup> IMCO Staff, "Barómetro de la corrupción de América Latina 2019 vía Transparencia Internacional," in IMCO, September 26, 2019, at <https://imco.org.mx/barometro-de-la-corrupcion-de-america-latina-2019-via-transparencia-internacional/> (date of access: November 21, 2023).

<sup>7</sup> Rafael Lemus, *Breve historia de nuestro neoliberalismo. Poder y cultura en México*, Mexico, Debate, 2021, pp. 14-15; and Ana Lilia Pérez, *Hijos del neoliberalismo*, Mexico, Grijalbo, 2023, p. 17.

<sup>8</sup> "Decreto por el que el Ejecutivo Federal establece bases para el programa de descentralización de los servicios de salud de la Secretaría de Salubridad y Asistencia," in *Salud Pública de México*, vol. 25, no. 6, November-December 1983, pp. 655-656, at <https://salud-publica.mx/index.php/spm/article/view/602> (date of access: January 27, 2024).

Figure 2. Corruption Perceptions Index in the Americas, 2023



Source: Taken from Transparency International, “Corruption Perceptions Index 2023,” at <https://www.transparency.org/en/cpi/2023> (date of access: November 19, 2023).

Setting aside the purported development for states, as well as the benefits of growth for the population, the reality was quite different, as it laid the groundwork for acts of institutional corruption for decades to come, especially in the federal states.<sup>9</sup> In this scenario, the field of sanitary regulation was not immune.

Since the mid-1990s in Mexico, what was known at the time as “sanitary control” was characterized by an inefficient capacity for response,

<sup>9</sup> Ministry of Health, *Democracia y cambio estructural en salud: hacia una política social de Estado*, Mexico, Ministry of Health, 2006.

monitoring, surveillance of regulations and complex paperwork, which led to it being identified “instead of a guarantee of protection,” as a barrier to development and a source of acts of corruption.<sup>10</sup> Given this situation, the Federal Commission for the Protection against Sanitary Risks (COFEPRIS) was created by presidential decree in 2001, with the aim of transitioning from a sanitary control scheme to one of health protection and prevention of risks and diseases. Within this framework, and in relation to the problems of corruption in federal states caused in part by the decentralization of health services, a Federal Sanitary System (SFS) was also established, made up of the 32 states and COFEPRIS, which was launched with three basic objectives: to protect the population, improve the competitiveness of companies, and protect domestic productive capacity.<sup>11</sup> However, acts of institutional corruption in the field of health and sanitary regulation continued for 20 years after its creation, without any strategy for structural change.

Currently, as part of the National Development Plan 2019-2024, the National Program to Combat Corruption and Impunity and to Improve Public Management 2019-2024 was developed<sup>12</sup> with the aim of strengthening the actions of the federal public service to eradicate corruption and impunity in the administrative sphere.<sup>13</sup>

The aim of this article is to document the presence of administrative corruption in the field of sanitary regulation and to present proposals for its eradication through government strategies implemented in Mexico since 2022.

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<sup>10</sup> *Ibid.*

<sup>11</sup> *Ibid.*, p. 165.

<sup>12</sup> Ministry of Finance and Public Credit and Ministry of Public Service, “Programa Nacional de Combate a la Corrupción y a la Impunidad, y de Mejora de la Gestión Pública 2019-2024,” *Diario Oficial de la Federación*, August 30, 2019, evening edition, pp. 4-60, at [https://www.gob.mx/cms/uploads/attachment/file/509882/PNCC1MGP\\_2019-2024.pdf](https://www.gob.mx/cms/uploads/attachment/file/509882/PNCC1MGP_2019-2024.pdf) (date of access: January 27, 2024).

<sup>13</sup> Ley General del Sistema Nacional Anticorrupción, Article 1, at [https://www.diputados.gob.mx/LeyesBiblio/pdf/LGSNA\\_200521.pdf](https://www.diputados.gob.mx/LeyesBiblio/pdf/LGSNA_200521.pdf) (date of access: January 27, 2024).



## Institutional corruption in the field of regulation

One of the areas susceptible to collusion between the public and private sectors is regulation. In the case of Mexico, according to the National Survey of Regulatory Quality and Government Impact on Companies 2016 and 2020 (ENCRIGE), prepared by the National Institute of Statistics and Geography (INEGI), the private sector perceives that acts of corruption occur mainly to expedite procedures, avoid fines or sanctions, avoid the closure of an establishment, pay less taxes, obtain licenses or permits, and avoid inspections. These results are partly due to the fact that users face intransigence and lack of clarity regarding the requirements, service times and fees for the procedures they undertake, leaving them exposed to abuses of power and government inefficiency. The above is reflected in the fact that for the year 2019, the total costs arising from corruption related to making payments, procedures or requests for public services, and other contacts was 12 779 716 766 pesos, equivalent to 3822 pesos on average per affected person.<sup>14</sup>

### A proposal for surveillance and transparency: National Strategy for Good Governance of the Federal Sanitary System

In order to carry out the National Strategy for Good Governance (ENBG) of the Federal Sanitary System (SFS), national coordination, training, supervision and outreach mechanisms were implemented, aimed at strengthening accountability and promoting integrity in public service, and thereby providing certainty about the correct execution of regulation, control and sanitary promotion processes throughout Mexico.

As part of the ENBG, five strategic axes were developed (see Table 1) and three areas of corruption mitigation: prevention, surveillance and detection and outreach.

<sup>14</sup> INEGI, *Encuesta Nacional de Calidad e Impacto Gubernamental (ENCIG) 2019. Main results*, Aguascalientes, INEGI, 2019, p. 141, at [https://www.inegi.org.mx/contenidos/programas/encig/2019/doc/encig2019\\_principales\\_resultados.pdf](https://www.inegi.org.mx/contenidos/programas/encig/2019/doc/encig2019_principales_resultados.pdf) (date of access: January 29, 2024).

**Table 1. Strategic axes, objectives and specific activities implemented by the sanitary risk protection areas (APCRS) based on the ENBG in the SFS**

Strategic axis	Specific objective	Specific activities
<b>Strategic axis I:</b> Formalization of the ENBG in the SFS	Establish commitments at the federal and state levels to standardize tools and operating mechanisms in order to prevent discretionary and corrupt acts.	<b>Specific activity 50.</b> The APCRS subscribed their respective local authorities to the ENBG.
<b>Strategic axis II:</b> Fostering prevention.	Develop, promote and coordinate awareness raising and communication campaigns for the prevention and responsible reporting of discretionary acts and corruption, aimed at public servants and regulated sectors.	<p><b>Specific activity 51.</b> The ENBG was disseminated in the following state media:</p> <ul style="list-style-type: none"> <li>- State Health Secretariat</li> <li>- Health services</li> <li>- State Comptroller's Office/State Civil Service</li> <li>- Internal Control Body (OIC) for Personal Health Services APCRS</li> <li>- Personal jurisdictions</li> </ul> <p><b>Specific activity 52.</b> Dissemination campaigns were implemented in state media.</p> <p><b>Specific activity 53.</b> Collaborative tools were formalized with business chambers and service providers.</p> <p><b>Specific activity 54.</b> A specific section for institutional dissemination was developed for official APCRS websites .</p>
<b>Strategic axis III:</b> technology and comprehensive oversight (public, private and social sectors to be carried out by COFEPRIS).	Detect deviations in the processes of sanitary regulation, control and promotion, through comprehensive supervision and the use of technology, providing certainty regarding their correct execution.	<p><b>Specific activity 55.</b> Participation in the national training program on authorization, verification and outreach processes.</p> <p><b>Specific activity 56.</b> Promoting participation in the supervision of authorization, verification and outreach processes.</p> <p><b>Specific activity 57.</b> Lapel video cameras were put into operation during sanitary checks.</p> <p><b>Specific activity 58.</b> Multidisciplinary rooms with video cameras were put into operation to provide support to the regulated sector.</p>

<b>Strategic axis IV:</b> strengthening integrity and institutional outreach.	Implement training actions to foster principles, values and rules of integrity in public service, as well as strengthen institutional links with the competent bodies.	<b>Specific activity 60.</b> Public servants were trained in prevention of corruption and integrity. <b>Specific activity 61.</b> Specific outreach areas were prepared to distribute to the corresponding bodies.
<b>Strategic axis V:</b> Monitoring and evaluation of ENBG	Measure the progress and scope of the ENBG for decision-making aimed at preventing corruption in the APCRS.	<b>Specific activity 62.</b> Monthly reports were sent out progress in the implementation of the ENBG in the SFS.

Source: Prepared by authors based on COFEPRIS, *Estrategia Nacional del Buen Gobierno en el Sistema Federal Sanitario*, Mexico, COFEPRIS, 2023, at <https://www.gob.mx/cofepris/documentos/estrategia-nacional-de-buen-gobierno-en-el-sistema-federal-sanitario> (date of access: August 6, 2024) and COFEPRIS, *Convenios Específicos en Materia de Transferencia de Recursos*, at <https://www.gob.mx/cofepris/documentos/convenios-especificos-en-materia-de-transferencia-de-recursos-2022> (date of access: August 6, 2024).

The final specific objective aims to monitor the progress and scope of the implementation of the specific activities that comprise the Strategy, in order to obtain appropriate and timely information for decision-making; for this purpose, five performance indicators were designed in two fields (see Table 2).

<b>Indicator</b>	<b>Objective</b>
1. Percentage progress in the implementation of the ENBG in the SFS.	Determine the effectiveness of the APCRS of the actions established in the ENBG.
2. Percentage of trained personnel from APCRS and sanitary jurisdictions in corruption prevention and public service integrity.	Promote integrity in public servants who comprise the SFS.
3. Percentage of promotional actions aimed at the regulated sector in terms of corruption prevention.	Develop, promote and coordinate preventive awareness campaigns.
4. Percentage of sanitary control activities supervised by technological equipment.	Detect deviations in health control processes in the APCRS.
5. Detect deviations in the sanitary control and promotion processes in the APCRS.	Provide certainty to the population and the regulated sector regarding correct implementation.

Source: Prepared by authors based on COFEPRIS, *National Strategy...*, [pp. 29-33].

An analytical and descriptive approach was used to process the information collected, the measures implemented in each of the pillars of the strategy were analyzed, and the impact of the actions undertaken at the national level was evaluated. In addition, challenges to the implementation of the strategy were identified and areas for improvement were detected. To ensure the validity and reliability of the results, a review of the information collected by the research team members was conducted. In addition, data triangulation techniques were used, comparing and contrasting information from different sources and perspectives to ensure the objectivity and robustness of the study.

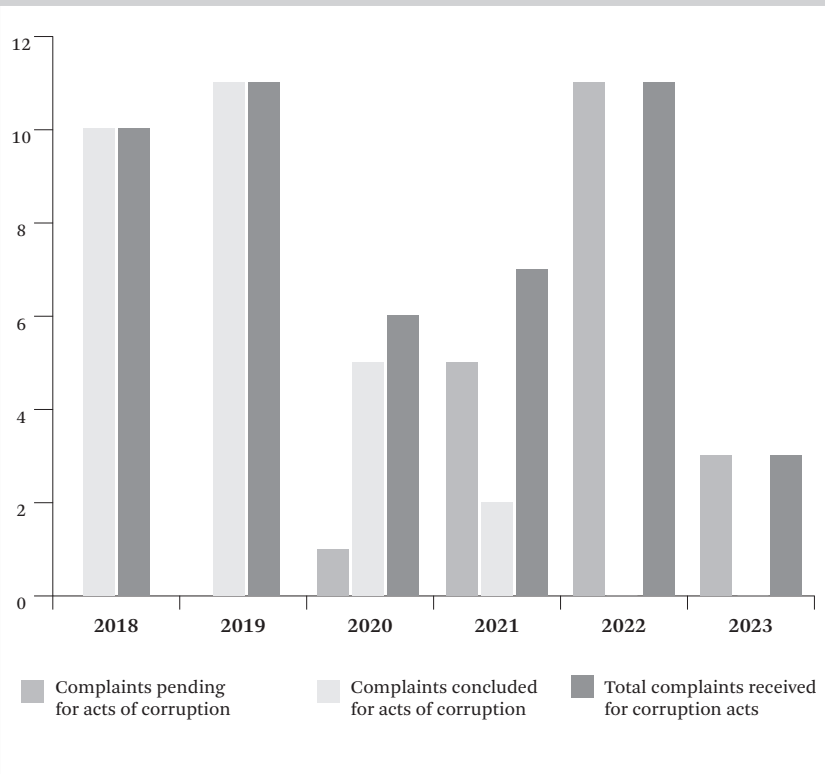
As shown in Graph 1, the records of reported acts of corruption in the complaints and investigations area of the national regulatory agency had a positive impact on the population and regulated users in light of the institution's invitation to report acts of corruption that targeted them. This meant that, starting in 2021, the number of complaints registered increased, and with it, the procedure for following up and resolving them, reflected in a reduction by more than half of the complaints received in 2023.

As a result of the records identified, in May 2022, COFEPRIS, through the General Coordination of the Federal Sanitary System (CGSFS), established the National Good Governance Strategy (ENBG). By means of coordination between the federal level and the 32 APCRS, the Strategy's goal has been to eradicate corruption through five strategic axes and to ensure that no public servant uses his or her position or functions for personal or collective benefit. The strategic axes are:

- Formalization of the ENBG in the SFS with the federal states.
- Fostering prevention.
- Technology and comprehensive supervision.
- Strengthening integrity and institutional outreach.
- Monitoring and evaluation of ENBG in the SFS.

Innovation actions were implemented to strengthen transparency in public administration. As part of this effort, the ENBG was launched nationwide in the SFS, carried out as a joint exercise between COFEPRIS and the Ministry of the Civil Service. The 32 heads of the country's APCRS and the state comptroller's offices took part.

**Graph 1. Annual comparison of complaints about institutional corruption**



Source: Prepared by the authors based on data from the COFEPRI Internal Control Body, 2023.

The information obtained establishes the results of the validation of the information sent to the CGSFS by the APCRS during 2022.

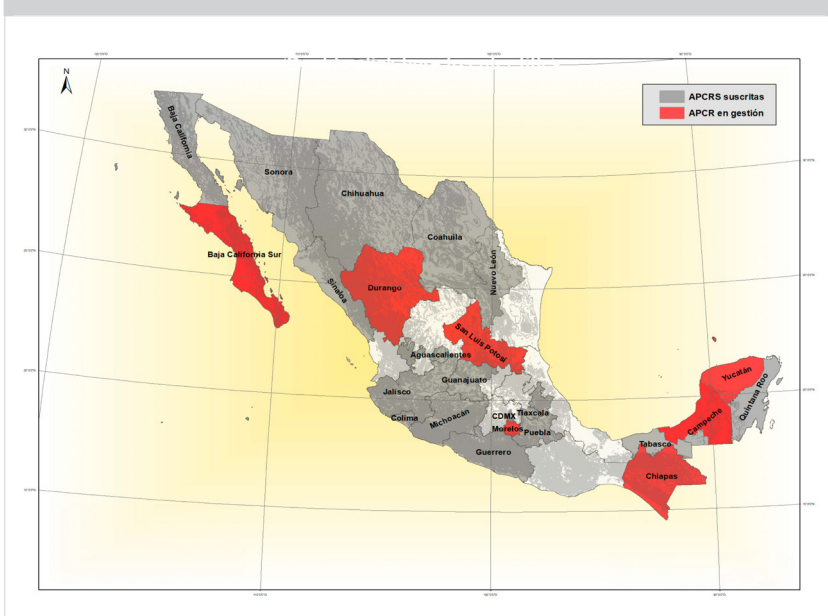
The data collected and presented in this article takes into account what was reported through the authorized electronic system, the information from the APCRS through the ENBG format for specific activities 50 to 63 of the Specific Agreements on Resource Transfer 2022 (CEMTR), as well as the documentary support that the quarterly report includes: official communications, photographic evidence, attendance lists, procedures, publications in state newspapers, authorized reports, among others.

## Analysis of the activities of the strategic axes

Below, we present the analysis of the results obtained through the authorized electronic system, by the APCRS through the ENBG format for activities 50 to 63 of the Specific Agreement on Resource Transfer 2022. Regarding Strategic Axis I: Specific Activity 50, which refers to the subscription of the ENBG in the SFS, suggested that of the 32 APCRS, 17 (53.1%) signed the ENBG in the SFS with their respective local authorities, and five are carrying out the corresponding procedures (see Map 1).

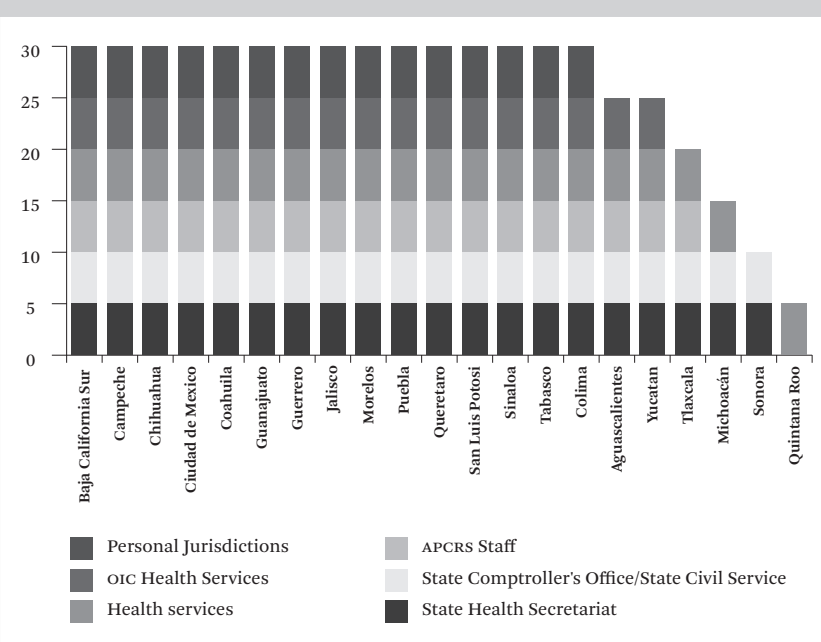
Regarding Strategic Axis II: Specific Activity 51, which refers to the dissemination of ENBG in the SFS in state media; of the 32 APCRS, 20 carried out dissemination, of which 17 (53.1%) were with the six state authorities (see Graph 2).

**Map 1. Representation of the APCRS in process and subscribed to the ENBG in the SFS**



Source: Prepared by the authors based on COFEPRIS, *National Strategy...*

**Graph 2. Dissemination of ENBG in the SFS with local authorities**

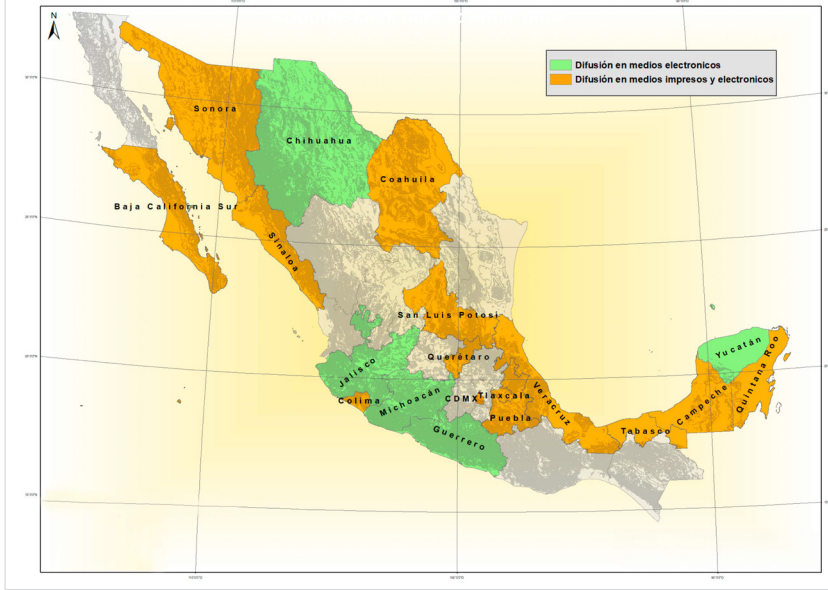


Source: Prepared by the authors based on COFEPRIS, *National Strategy*...

Regarding Specific Activity 52, on carrying out dissemination campaigns in state media, these were promoted through electronic media (webpages and social networks) and physically at locations providing attention to users (booths, Comprehensive Service Center, jurisdictions or equivalents) (see Map 2). It should be noted that, in addition to printed materials, projections on screens in user service areas have also been considered. It is also noted that two press releases were published in Morelos; in San Luis Potosi, a radio interview; in Sinaloa, two radio interviews and two television interviews were conducted; in Sonora, news items were prepared, and in Michoacán, a radio spot.

On Specific Activity 53: Regarding the formalization of collaborative tools in the area of corruption prevention, with business chambers and service providers that are within the scope of competence of COFEPRIS and the APCRS, which consists of the dissemination of the actions that arise from

**Map 2. Federal states that disseminated ENBG on broadcast channels**



Source: Prepared by authors based on COFEPRIS, *National Strategy...*

the ENBG, particularly: campaigns that draw attention to the points susceptible to acts of corruption in the processes the public user and people visited; and indicate the mechanism, the requirements and the body to which complaints regarding the actions of public servants can be channeled.

There are 16 states (50%) (Aguascalientes, Baja California Sur, Mexico City, Campeche, Coahuila, Colima, Michoacán, Morelos, Puebla, Querétaro, San Luis Potosí, Sinaloa, Sonora, Tabasco, Tlaxcala, Yucatán) recorded as implementing collaboration instruments with the regulated sector.

For Specific Activity 54, to develop a special section for institutional dissemination within official APCRS websites, 18 states (56.2%) carried out this activity. Of these, some presented difficulties in implementing it correctly, such as missing hyperlinks to the site of the internal control body and inappropriate and incomplete wording regarding the progress they have made with the ENBG.



Regarding Strategic Axis III: Specific Activity 55, on participating in the national training program on authorization, verification and outreach processes with the public, private and social sectors, the training received by the APCRS is provided throughout the year. This means there is information on training in sanitary verification and promotion processes in Campeche (the state with the highest number of training sessions at 40), Coahuila, Aguascalientes, Baja California Sur, Mexico City, Colima, Morelos, Puebla, Quintana Roo, San Luis Potosi, Sinaloa, Zacatecas, Tabasco and Yucatan.

Specific Activity 56, on promoting participation in the supervision of authorization, verification and outreach processes with the public, private and social sectors that will be carried out by COFEPRIS, is currently being implemented in the SFS by the administrative units that correspond to this Federal Commission.

On Specific Activity 57: Installing and operating lapel video recording cameras during sanitary checks, three states submitted evidence of the publication of the corresponding procedure in their official state gazettes:

- The Commission for the Protection against Sanitary Risks of the State of Campeche submitted official gazette, number 1827, dated December 16, 2022, in which they published the Guidelines of the Procedure for Carrying Out Video Recording in Verification Visits and in Multidisciplinary Rooms.
- The Undersecretariat of Regulation and Sanitary Promotion of the State of Coahuila, sent official gazette, volume CXXIX, number 96, dated December 2, 2022, in which they published the Guidelines for Video Recording in Verification Visits and in Multidisciplinary Rooms.
- The State Commission for Protection against Sanitary Risks in Baja California Sur published the Procedure for the Video Recording of Verification Visits and in Multidisciplinary Rooms.

There were 23 APCRS that reported progress in updating their regulatory framework for carrying out inspections with video recording cameras, in terms of the applicable guidelines.

Now, with regard to Baja California Sur, it is noted that it refers to having carried out a verification visit with video recording. Meanwhile,

the Undersecretariat of Regulation and Sanitary Promotion of the State of Coahuila stated that it carried out five verification visits with video recording.

It should be noted that some APCRS have not shown evidence of updating their regulatory framework for making video recordings during verification visits, while others have done so without complying with the guidelines established in the ENBG.

Regarding Specific Activity 58, which consists of installing and operating multidisciplinary rooms with video recording cameras to provide attention to the regulated sector, only Baja California Sur and Coahuila stated that they carried out this activity in compliance with the ENBG guidelines.

For specific activities 57 and 58, the APCRS submitted, through the Convention Administration System (SIACON), the estimate of portable cameras (621) and fixed cameras (90) to operate verification visits with video recording and put the multidisciplinary rooms into operation, respectively; Graph 3 shows the distribution by state.

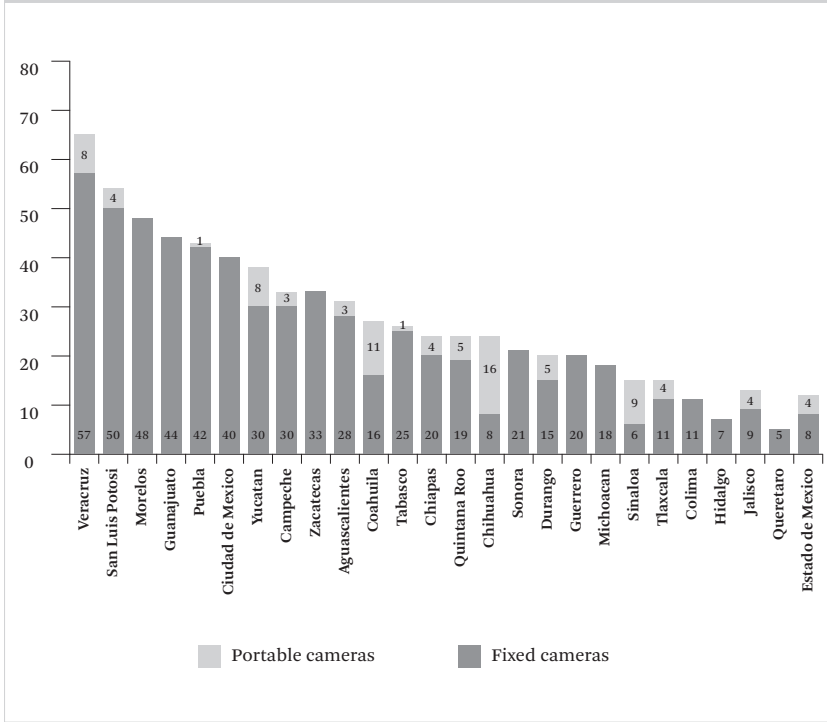
Regarding Specific Activity 59, on establishing a monitoring center for the evaluation and analysis of video recordings resulting from sanitary inspections and attention to the regulated sector, only the APCRS in Baja California Sur, Coahuila and San Luis Potosí have stated that they have a method of classifying the material resulting from verification visits with video recording and from multidisciplinary rooms.

Regarding Strategic Axis IV: Specific Activity 60, on training public servants in the prevention of acts of corruption and promoting integrity in the exercise of their functions, the dissemination of the applicable code of ethics and conduct is proposed, as well as two training sessions for all staff in the federal states:

- Online course “Corruption,” taught by El Colegio de México.
- Training provided by state civil service departments or equivalents.

In this regard, 24 APCRS reported training activities using the “Corruption” course: Aguascalientes, Baja California Sur, Campeche, Chihuahua, Mexico City, Coahuila, Colima, Durango, Guanajuato, Guerrero, Hidalgo, Jalisco, Michoacan, Morelos, Puebla, Queretaro, Quintana Roo, San Luis Potosi, Sinaloa, Sonora, Tabasco, Tlaxcala, Veracruz, Yucatan and Zacatecas with a total of 2722 officials (68%) receiving training in the 32 APCRS.

**Figure 3. Estimated acquisition of cameras for visits with video recording and multidisciplinary rooms**



Source: Prepared by the authors based on COFEPRIS, *National Strategy...*

Regarding the training and talks that the APCRS organized with their respective state civil service departments or equivalent were Aguascalientes, Baja California Sur, Campeche, Coahuila, Colima, Guerrero, Puebla, Querétaro, San Luis Potosí, Sinaloa, Sonora, Tabasco and Yucatan.

Meanwhile, 22 federal states disseminated the code of ethics and only 14 disseminated their code of conduct.

Regarding Specific Activity 61, on the promotion of a specific outreach department to transfer knowledge to the corresponding authorities on issues related to alleged acts of corruption, 14 APCRS have appointed the officials or departments in charge of outreach and 8 have developed the corresponding procedures.

Regarding Strategic Axis v: Specific Activity 62, on monthly submission of progress of the execution of the ENBG in the SFS, Map 3 shows the 24 federal entities that carried out the activity.

## Analysis of ENBG performance indicators

In order to measure the progress and scope of the ENBG in the SFS, in 2022 the APCRS was asked for a report of indicators to carry out the evaluation and compliance of its objectives, the same indicators that form part of Strategic Axis v. All the information submitted was reviewed in detail and an analysis was made of what was reported in contrast to what was documented. The results by indicator are presented below.

Indicator 1 was used to determine the effectiveness of the implementation of the actions committed to in the ENBG. The positive and assertive response of the APCRS in carrying out dissemination activities and formalizing collaboration instruments with the regulated sector must be recognized. However, the activities that have seen the least progress are the installation and operation of video recording cameras, multidisciplinary rooms for customer service, and the formalization of the specific outreach department. This is why, overall, there is a 37% level of progress. It is expected that negotiations will continue with the administrative units in charge of carrying out these activities and that with the corresponding legal support, the use of cameras or recording devices during the sanitary verification visit will be feasible.

Indicator 2 measured the proportion of staff trained in corruption prevention and integrity in public service. Training of all APCRS staff was considered, through the “Corruption” course and the training provided by state civil service departments or equivalents. In the end, the average proportion of trained APCRS staff was 43%. Open courses could be planned by video-conference on a permanent basis so that new staff can be trained.

Indicator 3 was intended to measure the proportion of dissemination and outreach actions carried out compared to those committed to. It had an average compliance of 47%. However, it is worth mentioning that the APCRS of Aguascalientes, Baja California Sur, Mexico City, Coahuila, Colima, Puebla, Sinaloa and Tabasco have accredited the activities aimed at the designation

Map 3. Federal states that sent the monthly report



Source: Prepared by the authors based on COFEPRIS, *National Strategy*...

and dissemination of the outreach procedure to transfer knowledge to the corresponding authorities on issues related to alleged acts of corruption.

It is worth mentioning that regarding indicators 4 and 5, only the APCRS corresponding to Baja California Sur and Coahuila have begun to implement the use of lapel cameras or multidisciplinary rooms in accordance with established guidelines, while comprehensive supervision visits to the APCRS by COFEPRIS were not carried out.

## Final Thoughts

The main objective of the ENBG is to implement coordination mechanisms in matters of dissemination, training, supervision and outreach, aimed

at strengthening accountability, promoting integrity in public service, preventing discretionary and corrupt acts, and providing certainty about the correct execution of the processes of regulation, control, sanitary promotion and strengthening institutional links with the competent bodies in matters of anti-corruption.

Its implementation has been a complex and multifaceted process, involving the adoption of measures and actions in different areas and levels of government. However, considering this is the first time in history that a strategy of this magnitude has been implemented in the sector of sanitary risk regulation in Mexico, it was well received by most states.

It is important to acknowledge that the main challenges for ENBG implementation in the SFS lie in factors such as the management process to harmonize state legal regulations for the implementation of the Strategy, the paradigm shift in management and operational staff, resistance, lack of commitment, and the persistence of corrupt practices rooted in the culture and in the institutional structures of the country. However, the Strategy has succeeded in establishing a robust institutional framework for the fight against corruption and the promotion of transparency and citizen participation, and has laid the foundations for a more efficient and results-oriented public administration.

There are still important challenges that need to be addressed, including: the effective implementation of established measures, the promotion of a culture of legality, the reduction of impunity, and improvements in the quality of public services. There is no doubt that the second quarterly report on the progress of ENBG will have better results. To strengthen the areas of opportunity identified, a number of measures are proposed:

- Implement the theme of corruption prevention in each of the sanitary promotion courses scheduled for 2023.
- Establish a control center for information analysis and high digital security for a more secure analysis and storage of the video recordings resulting from sanitary checks and made in multidisciplinary rooms providing attention to the public.
- Harmonize, at the federal level, the general laws to strengthen the legality of the use of cameras in sanitary inspections.

- Train APRCS staff in matters of anti-corruption to promote values and rules of integrity in the exercise of public service.
- Manage the reopening of the “Corruption” online course and other similar courses so that staff can receive training on topics aimed at maintaining the proper exercise of public service in the effort to protect against sanitary risks.

It is important to emphasize that the vast majority of officials are aware that the problem of corruption within the public service is a reality and are responsive to the overall objective, showing willingness to eradicate certain attitudes and behaviors in order to ensure that the implementation of the next stage of the ENBG is a success. It is essential to continue working on the implementation and consolidation of the Strategy, promoting the active and committed participation of all actors involved and strengthening the mechanisms of accountability and transparency in public administration. Only in this way will it be possible to move towards a more efficient, transparent, participatory and results-oriented public regulatory service, since the fight against corruption saves lives.

