Mexico's New Anticorruption Struggle

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INTRODUCTION

Mexico's approach to anticorruption policy has changed significantly in recent years. On January 29, 2019, the Coordinating Committee (CC) of the National Anticorruption System (SNA) approved the country's first National Anticorruption Policy (PNA). Though this policy is somewhat reminiscent of prior approaches, with the executive still leading the charge, fighting corruption is no longer the sole responsibility of the presidential administration. Instead, anticorruption efforts in Mexico now include a wide range of state institutions and autonomous organizations at all levels of government, civil society, and the public. Of course, whether the administration along with this massive, multidimensional, and fragmented system can succeed in finally taming corruption—a perennial problem in Mexico—depends on how the new system develops. Initial international indicators offer some positive results of this policy; however, corruption continues to dominate policy discussions and governmental affairs. The recent approval of the new national policy offers the opportunity to briefly highlight the current architecture, changes, and trajectory of Mexico's anticorruption policy, as well as the challenges ahead.

HISTORICAL AND GLOBAL CONTEXT

Any effort to understand corruption and efforts to combat it in contemporary Mexico should consider both the historical and global contexts. Historically, most administrations during their first year or two in office have championed the cause of battling corruption, pushed institutional reforms, launched anticorruption initiatives, prosecuted a handful of high-profile public officials (usually from the previous administration), and even registered positive gains in the main international corruption indicators. However, these concerted and once highly praised efforts quickly paled in comparison to the magnitude of the problem, were overwhelmed by more important political issues, watered down, partially implemented, dismantled, or totally delegitimized by scandal. Multiple international measures have empirically documented such reversals.[1] As discussed previously,[2] however, many factors have changed, creating a new and unique historical juncture for fighting corruption. Of course, whether these changes will fundamentally break Mexico's historic pattern of corruption remains unclear.

In addition to the historical context, it is also important to take into account the global context of fighting corruption. Despite decades of attention to corruption at the international and national levels by both governmental and nongovernmental organizations (NGOs), exceedingly few countries have enjoyed much success at curtailing systemic corruption. In short, no one has yet to discover the silver bullet or magic formula to solving this problem, and the experiences of the few countries that have been mildly successful offer few lessons to emulate.[3] Generally, we seem to know more about corruption than we do about anticorruption.

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MEXICO'S NATIONAL ANTICORRUPTION SYSTEM AND ANTICORRUPTION POLICY

Mexico's new National Anticorruption System (SNA) is the product of a series of constitutional and legal reforms in 2015 and 2016 set amidst targeted social outrage over the levels of corruption during the period, the sweeping mobilization of civil society organizations, and extensive debate. A fragmented and diffuse system, the SNA brings together a range of institutions to approve, coordinate, oversee, develop, pursue, and assess anticorruption policies at the national level. Nationally, the SNA is guided by the CC, composed of the leaders of most of the main institutions involved in the struggle against corruption: the Federal Administrative Tribunal (which adjudicates cases of corruption), the Federal Judicial Council (in charge of the administration of the courts), the federal auditor that reports to Congress, the Autonomous Institute for Access to Information, the newly created special prosecutor for corruption located within the now autonomous office of the Fiscalía (general prosecutor), the secretary of public function, and the president of the Committee of Citizen Participation (CPC). The CPC is composed of five citizens charged with overseeing the operation of the SNA, proposing policies, and coordinating the involvement of civil society. In addition, the SNA includes an executive secretariat office (SESNA) that offers technical support to the CC, conducts research, and develops metrics and assessment tools. The SESNA also creates and maintains the SNA–mandated national digital platform containing publicly available data on the property holdings of government officials, officials involved in government contracts, audits, government contractors and contracts, and sanctioned public officials. Finally, as a truly national system, the SNA also mandates the creation of a similar institutional framework at the state level, subject to the policies and oversight of the CC, the coordination of the CPC, and the technical assistance of the SESNA.

One key implication of the SNA is that unlike in the past, the president and the administration no longer have the sole responsibility of fighting corruption. In fact, the administration has just one representative on the CC: the secretary of public function. The other actors include representatives from the other branches of the federal government, autonomous groups like the Autonomous Institute for Access to Information, the special prosecutor, and civil society. The system's parallel extension to the states, the State Anticorruption Systems (SEA), reflects Mexico's federal structure. In many ways, all these institutions are responsible for fighting corruption in accordance to their powers and jurisdictions. Many, such as the Judicatura (Court Administrative Office) under the leadership of the president of Mexico's Supreme Court, are already pursuing their own anticorruption policies within their institutions.[4] At the same time, they are expected to work together and even push other institutional actors to develop and rigorously implement anticorruption policies. While this fragmentation diffuses responsibility and, conceivably, blame, it also broadens the scope of those engaged in fighting corruption. Indeed, the complexity of the SNA has been a point of great criticism.

To date, the SNA has been exceedingly slow to take shape and craft policy. Despite the legal reforms being in place for over two years, the naming and staffing of key institutional actors like the magistrate for the Administrative Tribunal took considerable time. And though progress varies, states have also been slow to establish their anticorruption systems. Initially, some governors sought to hijack and weaken the systems, and today many states remain engaged in the laborious process of appointing key officials. Due to these delays, anticorruption policy has been slow to emerge. In fact, despite a series of meetings, the CC only recently approved the PNA on January 29, 2020.

Reflecting the broadly collaborative system, the PNA emerged from numerous regional public fora, a public survey, and broad consultations with academics and

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major anticorruption NGOs. The initial draft assembled prior to the transition to President Andrés Manuel López Obrador's administration, however, met with a series of objections by the new government, leading to subsequent negotiations to incorporate key aspects of the president's National Development Plan. This process further delayed the PNA's approval by more than a year. In the end, despite initial reservations regarding both the SNA and the proposed policy, both the president and the secretary of public function proclaimed their support, with the secretary voting to approve the revised policy. Ideally, such broad consultation and incorporation of so many public and societal institutions help ensure buy–in. Just as the creation of the policy reflects the many institutional voices and interests, so too did its approval by the CC.

The PNA document itself provides a thorough assessment of the nature of corruption in Mexico, an impressive collection and review of data, and a strategic guide featuring four pillars and 60 policy recommendations.[5] In addition, it tags the institutions responsible for developing and implementing specific policies in each area. The PNA's four pillars of anticorruption policy are:

1. **Fighting impunity**

   Deemed the most series problem by the public and arguably the weakest link in the national integrity system, this strategic pillar includes a wide range of policy recommendations such as strengthening public denouncements of corruption, whistleblower protections, investigations, and sanctions. Above all, it stresses the need to strengthen the rule of law.

2. **Controlling arbitrary and discretionary authority**

   Among the recommendations in this area are to enhance the professionalization of the administration. This includes a relaunching of the civil service system initiated in 2003 to create a system based on merit and limit political involvement; improved training;

heightened integrity; stronger planning and budgetary procedures; an increased number, scope, and range of audits; and greater oversight of the budget.

3. **Involving society**

   Recognizing the critical role of citizen participation in fighting corruption, this pillar supports policies designed to heighten citizen vigilance, oversight, and collaboration with the government in the creation and implementation of public works projects and policies, and the promotion of open government initiatives. It also stresses the need for educating the public about the consequences of corruption and citizens' roles in fighting it, as well as creating a culture of integrity and enhanced communications to empower the public.

4. **Strengthening the points of contact between government and society**

   Given the problem of corruption within state–society interactions, this pillar promotes a series of recommendations to streamline procedures for obtaining government services, as well as initiatives to improve the delivery and transparency of government services, particularly in government interactions with business.

The PNA also exemplifies Mexico's new anticorruption environment in that the policy is truly national in scope. This means that the PNA applies not just to the federal government, but to the states as well, representing a minimum set of standards and requirements for the SEAs. States are permitted to go beyond the PNA and develop policy initiatives to address state and local problems, but they must adopt the contours of the national policy and are accountable to the SNA to carry out its mission to fight corruption. As with the other institutional actors, states must now develop specific policy initiatives in concert with the PNA while tailoring their efforts to their specific needs.

ANTICORRUPTION WITHIN THE LÓPEZ OBRADOR GOVERNMENT

While the president is but one of many actors within the diffuse and fragmented SNA, he nonetheless continues to play a major role in the nation´s fight against corruption. The administration sets the national tone and political agenda, applies political pressure on other institutions, and sponsors legislation to strengthen sanctions and alter institutions. Through the work of the secretary of public function and other agencies such as Treasury's Financial Intelligence Unit (UIF), the administration also oversees the operation of the federal government, conducts internal audits and investigations, and initiates the prosecutorial process. Much of the administration's anticorruption thinking and program are laid out in its National Development Plan and the National Program to Combat Corruption and Impunity and Improve Public Management 2019–2024.[6]

In stark contrast to the slow emergence of the SNA and the PNA, the administration's initial year in office brought about a whirlwind of legal and institutional changes designed to curb corruption, featuring a mix of both orthodox and unorthodox measures tied to the president's broader structural vision. In the area of fighting impunity, the government passed legislation mandating stricter penalties for the crimes of corruption, as well as the fabrication of official tax receipts and documents (a key tool behind recent scandals of diverting public funds). The government has also enhanced property forfeiture related to corruption and money laundering, and strengthened the UIF to facilitate the freezing of accounts thought to be involved in money laundering and corruption. The government has further promoted legislation eliminating key budget items used by members of Congress to receive kickbacks from state and local officials, and it has created a law prohibiting the executive from providing special tax exemptions to businesses. Meanwhile, recent institutional changes returned the inspector general offices to the secretary of public function's control, centralized public contracting within the treasury, and strengthened oversight and auditing mechanisms within the secretary of public function (internal audits) and federal auditor (external audits). Strengthening preventive measures, the government has also implemented a strict disclosure system requiring all public officials to declare their property holdings, taxes, and interests, including a system allowing anyone to see the salaries of public officials and their property holdings.

The government's central player in its anticorruption effort is the newly empowered secretary of public function (the agency had actually been slated for elimination by the previous administration). Under the direction of "corruptologist," Irma Eréndira Sandoval Ballesteros from the Universidad Nacional Autónoma de México, the secretary of public function has launched a series of high-profile initiatives centering around five strategic areas:

1. **Greater citizen participation in the anticorruption fight**

   This includes strengthening the role of social comptrollers; creating a program encouraging businesses involved in government contracts to develop internal anticorruption measures and ethics programs; offering official recognition and preferential treatment in government contracts to those who meet defined benchmarks; and developing a new initiative to assist the victims of corruption.

2. **Democratizing technologies to process and make data publicly available through the national digital platform**

   This includes a broadening of the requirements by public officials to declare property holdings and interests, making these along with salaries of officials publicly available, and a redesign of the system handling citizen complaints of corruption including an easy to use app.

3. **Whistleblower protection**

   This includes a platform for reporting wrongdoing, guarantees of anonymity and job protection, and follow-up mechanisms.[7]

4. **The relaunching of Mexico´s stalled professional civil service system with a focus on gender**

    Though still awaiting legislative action, this program will incorporate training of government officials, merit-based hiring, gender balance, and a more professional performance evaluation.

5. **Austerity, oversight, audits, and public management assessments**

    This strategic initiative encompasses more effective audits focusing on outcomes, site visits, and a streamlining of government offices.

Much of the secretary of public function's anticorruption work centers on the offices of internal control located within each federal agency. Like U.S. inspectors general, these offices receive and process complaints, conduct initial investigations, substantiate charges, and either issue administrative sanctions for minor offenses or refer the more serious cases to the special prosecutor to combat corruption within the Fiscalía. In 2019, the SFP received over 30,000 complaints, initiated more than 22,000 investigations, and issued roughly 10,000 observations of possible irregularities based on 2,401 oversight actions and internal audits. It brought 128 criminal charges for possible corruption before the FGR, issued 316 sanctions against those involved in government bids and contracts, and more than 4,700 sanctions against public servants, including 1,504 disqualifications, 992 suspensions, 392 economic sanctions, and 277 firings.[8] As part of the agency's new approach, roughly 40% of audits now go beyond looking simply into the finances to assess the effectiveness of the program. These internal audits are in addition to the external audits conducted by the federal auditor (independent of the administration), which detected serious irregularities in government spending and extensive tax evasion in 2018.[9]

A critical component of the president's fight against corruption involves the battle against impunity. While estimates of the level of impunity for crime in Mexico surpass the 90% mark, impunity for corruption is likely even higher. Of course, much of the state´s infrastructure charged with investigating and prosecuting corruption—such as the federal auditor, the special prosecutor, and the judiciary—are largely autonomous and lie outside of presidential control. Within the administration, much of the task of fighting impunity within the government involves the secretary of public function processing complaints, investigating and sanctioning minor administrative irregularities, identifying discrepancies in the property declarations of officials, and presenting criminal charges to the special prosecutor and the UIF, which is charged with investigating money laundering and financial irregularities. Like the secretary of public function, the UIF also must present its cases to the Fiscalía for prosecution.

Combined, the two agencies have conducted investigations, issued sanctions, frozen accounts, and presented materials to the Fiscalia. Some cases have received national attention and targeted high-level officials, but not many. To date, the secretary of public function has announced the suspension and prohibition from state employment of a few high-profile officials, such as the former head of Pemex and the former secretary of tourism and development, but such administrative sanctions stem merely from administrative irregularities like the failure to declare certain property holdings, rather than corruption. As of March 2020, Santiago Nieto, the head of the UIF (and former head of the prosecutorial office for election crimes who was fired by former President Enrique Peña Nieto after investigating the channeling of public funds and bribe money into the president's electoral campaign) had submitted 177 criminal complaints for operations involving over 300 billion pesos in illicit funds, including seven complaints for illegal outsourcing and 15 for falsifying tax documents. He has also frozen 12,000 accounts. Some of these actions involve high-profile former officials including the former Supreme Court Justice Eduardo Medina Mora, the former head of Pemex, a prominent attorney tied to former president

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Carlos Salinas, and officials associated with the massive *Estafa Maestra* (Grand Fraud) scandal, among many others.[10] At the same time, the U.S. has taken on a large role in fighting impunity in Mexico by prosecuting extradited drug traffickers like Joaquin "el Chapo" Guzman, as well as Genaro Garcia Luna, the secretary of public security under former President Felipe Calderón.

But despite these moves, there have been few judicial cases capturing the public's attention and symbolizing the government's commitment to fighting impunity. In mid-January of 2020, the special prosecutor reported that 656 corruption-related investigations of current and former officials from 11 government agencies, the judiciary, and the state of Veracruz were underway, with 117 cases concluded and five sent to trial. In addition, the special prosecutor noted the investigation of 1,355 complaints of possible irregularities within the Fiscalía itself.[11] Though boasting just 33 agents and promising to triple the number of investigations in the coming year, this is arguably a weak link in the system and points to one of the challenges of coordination. Even if the secretary of public function, federal auditor, and UIF are successful at identifying corruption and submitting their findings to the special prosecutor, the lack of trials, prosecutions, and public punishment does little to curb the perception and reality of widespread impunity. One study reported no sentences stemming from the 125 criminal cases involving more than 6 trillion pesos from 2008–2017 that were filed with the attorney general's office by the federal auditor.[12] Similarly, despite the over 20 official criminal complaints filed by the federal auditor in the massive *Estafa Maestra* case from 2014–2018, none have produced a criminal investigation leading to a sentencing.

In addition to these well-established measures designed to fight corruption and impunity, the president has also pursued a series of unorthodox initiatives targeting a somewhat broader vision of corruption, or what is often called structural corruption. Such measures include the elimination of special tax concessions and forgiveness to businesses, a form of legal corruption used

by prior administrations that allowed many of the nation's larger companies to pay zero taxes. Another unorthodox measure includes a sweeping austerity law that restricts government spending, including the salaries of high-level officials; eliminates a range of high-level positions; and in an effort to help close the revolving door, prohibits high-level officials from working in the private sector for 10 years in areas associated with their former government post. Going beyond traditional measures used to fight corruption, this law seeks to curtail the tendency of the governing elite to abuse their positions to "feather their bed," create well-paid positions for followers (a form of clientelism), and engage in excessive spending.

Other controversial and unorthodox measures include the president's initiative to eliminate governmental intermediaries—the source of much corruption and waste within social programs—and provide aid directly to recipients. Beginning with the federal program for day care centers, the controversial anticorruption measure caused havoc as day care centers struggled to survive after being cut off from federal funding and families, who now receive a stipend to pay care providers directly and struggle to pay for the services. At the same time, the government lost some of its leverage to ensure that day care centers meet the minimum standards and training required for childcare. Similar to this approach is a policy change eliminating government funding to NGOs, including those dedicated to fighting corruption. Like the policy focused on day care centers, this also seeks to eliminate corruption occurring through intermediaries, clientelism, and the government's tendency to reward supporters through such devices. Another unorthodox anticorruption move includes the president's controversial decision to eliminate the construction of the new international airport launched by the Peña Nieto administration. Rooted within the idea that the new airport reflected many layers of corruption, this decision, however, was made prior to clear evidence of any corruption involved in the construction contracts. It was in fact many months later, with the release of the oversight and

audit reports for 2019, that the government uncovered the irregular and fraudulent contracts for the new airport. While no one doubts the serious problems and networks of corruption that prevail within all these areas, such unorthodox measures tend to fit a pattern in which the president seems to wield a sledgehammer rather a finer tool to fight corruption. Of course, these finer tools have failed to produce results in the past.[13]

INITIAL RESULTS

Despite criticisms from some camps, the slow rollout of the SNA and PNA, and the lack of high-level prosecutions, initial international indicators released during 2019 show some positive signs in fighting corruption. Of course, as already noted above, this is consistent with historical patterns. According to Transparency International's Global Corruption Barometer for Latin America and the Caribbean 2019, for example, 61% of respondents had a favorable assessment of the current government's job of fighting corruption, compared to just 24% in 2017. In fact, a minority, 36%, offered a negative assessment, a drop from 61% two years earlier. More importantly, the percentage claiming corruption had decreased during the prior 12 months climbed 15 points to 21%.[14]

Transparency International's Corruption Perception Index (CPI) 2019 similarly shows a slight improvement from 2018, and at least a reversal of the downward pattern registered since 2014. Based on expert and business opinion rather than public opinion, the CPI ranks corruption from 0 (less corruption) to 100 (more corruption). Mexico climbed from a score of 28 to 29 on this scale, raising its global ranking from 138 of 180 countries in 2018, to 130 in 2019. In addition, two of the three specific polls looking solely at 2019 showed improvement.[15]

While the government understandably touted these findings as proof of progress, two recent polls suggest the erosion of such favorable assessments. A poll in February 2020 points to a sharp drop in the percentage saying corruption has declined, from 51.1% in late August 2019 to 41.6% in mid-February 2020,[16] while a Grupo Reforma poll conducted in early 2020 shows a precipitous drop in the public's approval of the government's fight against corruption, from 70% in 2019 to 43% in 2020.[17]

CONCLUSION

Mexico faces significant challenges in battling deep-seated and systemic corruption. This fact has not changed despite a revised institutional architecture and the emergence of a left-oriented president who has not only made battling corruption his top priority, but is proceeding in some rather unique ways. Indeed, the overview here barely scratches the surface of the many anticorruption initiatives taking place within a range of state institutions, civil society organizations, think tanks, and even business associations. Given that corruption invades virtually every corner of the government, has distorted the nation's political culture, and has undermined public policy, the task of eliminating it is nothing short of herculean. To be sure, the president and the SNA have their critics.[18] The challenges are many and extend beyond the sheer size of the problem, and include the coordination of many different actors, the development of much needed accountability reforms at the state and municipal levels, the training of professional investigators capable of assembling evidence for prosecution, the creation of a judicial system capable of crippling impunity, and even the development of good assessment measures to gauge progress and close any feedback loops. In fact, the CC in charge of leading the SNA lacks two of its five members because Congress has not yet appointed a selection committee, a development some see as an effort to cripple or slow the initiative.[19] Hopefully, the combination of the president, multiple government agencies, autonomous public institutions, and civil society working together will trigger a process of change to successfully combat corruption in Mexico.

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ENDNOTES

1. Stephen D. Morris, *Corruption and Politics in Contemporary Mexico* (Tuscaloosa, AL: University of Alabama Press, 1991; Stephen D. Morris, *Political Corruption in Mexico: The Impact of Democratization* (Boulder, CO: Lynne Rienner, 2009). For information on international measures over the years, see Transparency International: https://www.transparency.org/research/cpi/overview.

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4. Declaring corruption a threat to the democratic rule of law and acknowledging the prevalence of clientelism, influence trafficking, nepotism, and conflicts of interests within the judiciary, the head of the Supreme Court and the Judicial Council, Arturo Záldivar, recently announced a historic agreement to eradicate nepotism and corruption within the Federal Judicial System. See "Corrupción judicial, amenaza al estado de derecho: Zaldívar," *La Jornada*, February 6, 2020, https://www.jornada.com.mx/2020/02/06/politica/005n2pol; and José Raúl Linares, "Suspenden a magistrado por presenta corrupción; #NoMásDerroches," *Proceso*, October 10, 2019 https://www.proceso.com.mx/602699/suspenden-a-magistrado-por-presunta-corrupcion-reviso-amparos-de-nomasderroches.

5. "Política Nacional Anticorrupción," Secretaría Ejecutiva del Sistema Nacional Anticorrupción, accessed March 16, 2020, https://www.sesna.gob.mx/politica-nacional-anticorrupcion/.

6. The National Development Plan 2019–2024 (https://lopezobrador.org.mx/wp-content/uploads/2019/05/PLAN-NACIONAL-DE-DESARROLLO-2019-2024.pdf) emphasizes the president´s priority of fighting corruption. It contains insights into how the president understands corruption, the scope and nature of its impact on the country, and his anticorruption strategy. The National Program to Combat Corruption and Impunity and Improve Public Management 2019–2024 (http://dof.gob.mx/nota_detalle.php?codigo=5570984&fecha=30/08/2019&print=true) is based on the National Development Plan and presents the government´s broad anticorruption and public management strategy. It endorses five objectives: i) combatting the causes and effects of corruption; ii) combatting administrative impunity within the federal government; iii) promoting the efficiency and effectiveness of the public management; iv) promoting the professionalization and efficient management of human resources within the federal public administration; and v) promoting the efficient and responsible use of state property.

7. See "Ciudadanos Alertadores Internos y Externos de la Corrupción," Gobiero de México, https://www.gob.mx/profedet/es/articulos/ciudadanos-alertadores-internos-y-externos-de-la-corrupcion-223011?idiom=es.

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13. See Morris, *Political Corruption in Mexico*.

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19. See Jaime, "Ensayo de requiem."

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