Independent Reporting Mechanism (IRM): São Paulo, Brazil, Progress Report 2017

Laura Trajber Waisbich, Independent Researcher

The Open Government Partnership (OGP) is a voluntary international initiative that aims to secure commitments from governments to their citizenry to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. In 2016, OGP opened to subnational participants in their own right as part of a pilot program. The OGP Subnational Pilot Program consists of 15 subnational governments that submitted action plans and signed onto the Subnational Declaration at the Paris Global OGP Summit. These governments implemented action plans from 1 January 2017 to 31 December 2017.

The Independent Reporting Mechanism (IRM) reports for OGP subnational pioneers will be published primarily online. As a result, this report is outlined in terms of the final site layout of the report.

Site map

- Overview
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- Development process and monitoring of the action plan
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Overview

Period under Review

Action Plan under Review	2017
Dates of Actions under Review	01/2017–12/2017

Summary of IRM Findings

São Paulo's pilot action plan prioritized consolidating and boosting existing initiatives on capacity building and citizen participation in local governance. Despite major political transitions that affected commitment implementation, the multi-stakeholder forum led a collaborative process ensuring ample institutional participation. Moving forward, São Paulo could pursue reforms in key policy areas—such as housing, health, or education—and improve opportunities for the public to hold officials accountable for their actions.

Participation in OGP

Action Plan Date	01/2017–12/2017
Lead Agency (Office, Department, etc.)	São Paulo Aberta Initiative, Municipal Secretariat for International Relations

At a Glance

Table 1. At a Glance	
Number of Commitments	5
Level of Completion	
Completed	1
Substantial	1
Limited	3
Not Started	0
Number of Commitments with...	
Clear Relevance to OGP Values	3

Transformative Potential Impact	1
Substantial or Complete Implementation	2
All Three (✪)	0
Did It Open Government?	*Major*	0
	Outstanding	0

Action Plan Priorities

1. Improvement of citizens' understanding of open government concepts, tools, and policies
2. Improvement of civil servants' understanding of open government concepts, tools, and policies
3. Improvement of citizen participation at the submunicipal (Regional Prefectures) level and in co-designing innovative technological solutions to city's problems

Institutional Context

This section summarizes the institutional and subnational context. It describes the lead institutions responsible for the action plan, their powers of coordination, and how the institutional setup affects the OGP process.

OGP leadership in São Paulo

The municipality of São Paulo's OGP action plan was led by the Municipal Secretariat for International Relations (SMRI), through its São Paulo Aberta Initiative. The SMRI was closely supported by the ombudsman-like Office of the Municipal Comptroller (CGM), mostly through its Integrity Promotion Division (COPI). Those two institutions stand as the governmental representatives in the Shared Management Forum, a multi-stakeholder body set up to coordinate OGP action plans in the city. The Inter-Secretarial Committee of Open Government of São Paulo (CIGA-SP) played a minor advisory role. The legally mandated body in charge of promoting the open government agenda in the city, CIGA-SP comprises 13 secretariats, including the SMRI and CGM, and the Municipal Public Technology Company. The city government finalized its commitment to "implement the OGP agenda at the municipal level" in 2014, through the Municipal Executive Decree 54.794/2014.[1] This occurred years ahead of the OGP subnational pilot program and was mostly inspired by the Brazilian federal government's participation in OGP. In 2016, once the municipal government itself became an OGP member, it did not pass new legislation or amend the decree. Nonetheless, the government did include São Paulo's pilot action plan commitments in the 2017–2020 City Mayor's Goals (Programa de Metas). This inclusion serves as a sign of the agenda's renewed political importance. It also constitutes an opportunity for the first pilot commitments to have their implementation monitored and accounted for at least until 2020.

Municipal elections, hosted at the end of 2016, significantly impacted OGP leadership during this first pilot action plan. The Fernando Haddad (Partido dos Trabalhadores or Worker's Party, PT) administration elaborated the plan. João Dória's (Partido da Social Democracia Brasileira, PSDB or Brazilian Social Democracy Party) administration implemented it. Political alternation in municipal executive leadership brought substantial changes in political leadership and within the civil service in

virtually all secretariats, including the SMRI and CGM during implementation. Coupled with the electoral transition, increasing financial constraints have further reduced the number of civil servants working at São Paulo Aberta. From the action plan elaboration, in 2016, to end of implementation, in December 2017, three different civil servants have served as OGP point of contact.

Table 2. Summary of OGP leadership in São Paulo

1. Structure	Yes	No
Is there a clearly designated government lead for OGP?	X	
	Shared	**Single**
Is there a single lead agency or shared leadership on OGP efforts?	X	
	Yes	**No**
Is the head of government leading the OGP initiative?		X
2. Legal Mandate	**Yes**	**No**
Is the government's commitment to OGP established through an official, publicly released mandate?	X	
Is the government's commitment to OGP established through a legally binding mandate?		X
3. Continuity and Instability	**Yes**	**No**
Was there a change in the organization(s) leading or involved with the OGP initiatives during the action plan implementation cycle?	X	
Was there a change of executive leader during the OGP action plan cycle?	X	

Participation in OGP by Government Institutions
This subsection describes which government institutions were involved at various stages in OGP.

Two departments led São Paulo's participation in OGP. The Municipal Secretariat for International Relations led through its pilot project São Paulo Aberta. The Office of the Municipal Comptroller (CGM) led mostly through its Integrity Promotion Division (COPI). The implementation involved other departments in an indirect or auxiliary capacity. Table 3 details which institutions were involved in OGP.[2]

São Paulo Aberta and COPI/CGM led early participation in OGP. Members of the Inter-Secretarial Committee of Open Government of São Paulo contributed at a later stage, when assigning responsibilities for implementing the co-constructed action plan. Some departments initially listed on the action plan as leading on specific commitments ended up not fulfilling these implementation roles. Such departments include Municipal School of Public Administration of São Paulo, the Secretariat of Culture, and the Secretariat of Communication). Subsequently, São Paulo Aberta and COPI/CGM took over these roles, with the support of civil society organizations from the Shared Management Forum (the Forum). In most of the cases, this shift can be attributed to changes in the political leadership and

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personnel changes in secretariats during the electoral transition. It can also be attributed to the subsequent lack of or insufficient renewed political or financial commitment to the OGP action plan. Later incumbents did not feel enough ownership over the plan or did not identify with it.

During implementation, governmental departments had some degree of interaction with the Forum when renegotiating and eventually executing action plan activities. These departments include the Secretariat for Innovation and Technology, the Secretariat for Regional Prefectures, and the Secretariat for Government Relations. The government mobilized a vast range of additional departments for specific activities during implementation, particularly for Commitment 1 (Participation) and Commitment 2 (Training), but also for Commitment 4 (Institutionalization) and 5 (Innovation). These departments include Regional Prefectures, the Secretariat of Justice, the Secretariat of Human Rights and Citizenship, the Secretary of Assistance and Social Development, and the Secretariat of Education. The Education Secretariat had a particularly important brokering and support role, for instance, in yielding virtual spaces for São Paulo Aberta to host some of its OGP communication material.

Table 3. Participation in OGP by Government Institutions

How did institutions participate?	Ministries, Departments, or agencies	Legislative (parliaments or councils)	Justice institutions (including quasi-judicial agencies)	Other (special districts, authorities, parastatal bodies, etc.)
Consult: These institutions observed or were invited to observe the action plan, but may not be responsible for commitments in the action plan	13	0	0	1
Propose: These institutions proposed commitments for inclusion in the action plan	2	0	0	0
Implement: These institutions are responsible for implementing commitments in the action plan whether or not they proposed the commitments	15	2	0	34

Commitment Overview

São Paulo's pilot action plan prioritized consolidating, grounding, and boosting existing—and often incipient or early stage—open-government-related initiatives (policies, actions, and mechanisms). The plan focused on five interrelated areas: (i) citizen participation, (ii) training and capacity building on open government concepts and tools, (iii) communication and dissemination of open government initiatives, (iv) institutionalization of open government within City Hall through capacity-building activities, and (v) citizen-focused technological innovation. One of the most salient issue areas involved capacity building on open government, both for citizens and for civil servants. The other most salient issue was citizen participation in local (submunicipal or Regional Prefectures-level) governance affecting service delivery and in co-designing innovative technological solutions to a range of policy issues. Expected beneficiaries included citizens elected as councilors in local participatory bodies and local communities in all 32 Regional Prefecture (Commitment #1). Other expected beneficiaries included citizens at large (Commitments 2 and 3), civil servants (Commitment 4), and local technology and transparency civil society groups (Commitment 5).

Municipal elections had a major impact on this pilot action plan, either delaying commitments' implementation or affecting the content of what had been agreed for during the elaboration and initial planning phases. Transition brought instability in the OGP leadership and required cumbersome efforts from the remaining technical body to renew high-level commitment to the OGP action plan. The transition also significantly reduced human resources in key departments. Most commitments had implementation periods of less than a year (starting from April 2017). This shorter implementation time frame limited the extent to which commitments opened government. However, it also revealed the impressive task performed by a reduced team of highly committed, young civil servants and a few civil society organizations struggling to sustain and expand the city's open government agenda.

The capacity-building commitments resulted in encouraging achievements. Such initiatives included the Open Government Agents Program and the Open INFO Network. The government also hosted a range of successful trainings. These commitments are understood as signs of change in government practice for the purpose of the pilot OGP program. Early results include civil servants from a range of policy sectors designing new pilot open-government projects, mostly transparency related, to be implemented beginning in 2018. The IRM researcher could not verify early results on the citizen-led public trainings on open government. The research also could not verify results on long-term capacity development efforts to boost civil society's ability to hold São Paulo City Hall accountable. However, these efforts could be better assessed by the end of 2020, considering the inclusion of the Open Government Agents Program in the 2017–2020 City Mayor's Goals. Commitments related to citizen participation and communication faced significant implementation challenges. Several factors contributed to slowing down or altering planning or activities on these commitments. The outgoing and incoming administrations conceived "citizen participation in the city" in different ways, and there existed lack of clarity on the division of roles during implementation.

Table 4. Overview: Assessment of Progress by Commitment
Table 4 displays for each commitment the level of specificity, relevance to OGP values, and potential impact level of completion.

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsens	Did not change	Marginal	Major	Outstanding
1. Participation			✔		✔	✔					✔			✔					✔		
2. Training				✔		✔					✔				✔				✔		
3. Communication		✔				Unclear				✔				✔				✔			
4. Institutionalization			✔			Unclear						✔				✔			✔		
5. Innovation			✔			✔		✔			✔			✔					✔		

General Recommendations

For the past decade, the city of São Paulo has championed the open government agenda in Brazil. Its participation in the OGP subnational program served to update and renew the municipality's political commitment to expand and consolidate the agenda. Moving forward, government and civil society actors should focus on increasing the ambition of future plans and ensuring the sustainability of the municipal open government agenda. The IRM researcher recommends building on and enhancing the trusted spaces forged in 2016 to co-construct the action plan. The researcher also recommends managing the OGP locally and expanding the use of the OGP framework to address key and pressing sectorial issues and policy problems affecting people's lives. A sustainable open government agenda combines process-driven and capacity-building initiatives with ambitious sectorial policy reforms.

Recommendations to the Shared Management Forum

Diverse action plan: Make sure future action plans balance between commitments aiming to invest in structural open government capacity-building and dissemination initiatives, and commitments seeking to open government in key sectorial policies. The former would include strengthening implementation of

those commitments initiated in 2017. The latter would involve issues such as housing, health, education, and anti-corruption. The Shared Management Forum (the Forum) should allow more time to refine commitments' language, to include clear result indicators for monitoring, evaluation, and learning (ME&L).

Stronger focus on public accountability: Promote the development of commitments that focus on integrity and public-facing systems of accountability. Enhanced integrity and anti-corruption commitments can build on or expand existing mechanisms, such as the electoral clean-slate law Ficha Limpa (a direct people's initiative bill of 2010). Such commitments could also boost efforts by governmental bodies such as the Office of the Municipal Controller, which has recently launched an Integrity and Good Practices Program.[3] These efforts should integrate public-facing mechanisms that call upon the government to justify its actions, act upon criticisms or requests made of them, and accept responsibility for failure to perform with respect to laws or commitments.

Inclusive action plan development: Keep investing in participatory co-construction, building on the diversity and inclusiveness of consultations and allowing for more time for the whole process. These actions will increase ownership within and outside government. Expand participation of civil society actors, both thematically and geographically. Recruit new governmental actors, for instance, by adding a complementary internal consultation process with governmental departments.

Enhanced governance: Develop a clear set of guidelines to clarify roles and responsibilities of both civil society and governmental representatives in the Forum during action plan development and implementation. These guidelines should complement Inter-Secretarial Committee of Open Government (CIGA) Resolution No. 1 (from August 2016). Consider inviting all CIGA members, particularly those involved in commitment implementation, to join Forum meetings. Also, establish a clear dialogue and mutual-accountability framework between the Forum and the CIGA.

Decentralized implementation: Strengthen São Paulo Aberta's coordination and mobilization roles, both within the Forum and the CIGA, sharing implementation responsibilities with other relevant departments. This will expand buy-in and political and financial commitment from other secretariats. Alternative arrangements, such as shared OGP coordination between two or more City Hall departments, can be explored to strengthen coordination and achieve decentralization.

Expanded civil society oversight: The Forum should work to develop a mobilization strategy to engage other civil society organizations, social movements, academia, and individual citizens during plan implementation. Such involvement allows for increased participation and expanded external accountability. Hosting open Forum meetings and meetings outside the City Hall premises—for instance, in Regional Prefectures—can contribute to democratizing OGP in the city.

Learning: Create a space for reflecting on lessons learned from this pilot action plan, and invest in spaces for ME&L throughout the implementation cycle.

Recommendations to the Municipal Secretary of International Relations and to the Mayor of São Paulo

Expansion of action plan focus: Boost action plan ambition through the design of commitments that are better linked with key policy areas and challenges. This will extend the current focus of internal capacity building to include broader policy reform. Make OGP an enabling platform for actors in and outside of government to co-construct commitments on specific issues, such as anti-corruption efforts, housing, education, transport, and health.

Invest in human resources for open government: Secure financial viability of the future municipal action plan by continuously investing in committed civil servants. This investment should reflect personnel both in the São Paulo Aberta Initiative and the open government focal points within sectorial secretariats and Regional Prefectures.

Promote greater institutional coordination for open government: Increase the frequency of Inter-Secretarial Committee of Open Government meetings and their active role in developing and implementing municipal action plans. Greater coordination can also make the OGP a space for boosting and showcasing ongoing innovative pilot initiatives in key sectorial policies already being developed by City Hall departments.

Enable and support dialogue on open government: Dialogue should be promoted within the country and among other subnational entities in the region and around the world. Such action would connect open government to other relevant global development initiatives, such as the Sustainable Development Goals.

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[1] "Municipal Executive Decree No. 54.794/2014," City Hall of the City of São Paulo, http://www3.prefeitura.sp.gov.br/cadlem/secretarias/negocios_juridicos/cadlem/integra.asp?alt=29012014D%20547940000.
[2] Among the governmental institutions participating in the OGP action plan in 2017 are 13 departments and the Municipal Public Technology Company (all members of the Inter-Secretarial Committee of Open Government of São Paulo [CIGA] were consulted during action plan elaboration). During implementation, 14 departments took part in the process, four of them (Municipal Secretariat for International Relations, Office of the Municipal Comptroller, Secretariat for Governmental Relations, Secretariat of Innovation and Technology) were responsible or shared responsibility for commitments. The remaining ones assisted in implementing specific activities within commitments (Secretariat for Regional Prefectures, Secretariat of Justice, Secretariat of Human Rights and Citizenship, Secretariat of Education, Secretariat of Culture, Secretariat of Health, Secretariat of Assistance and Social Development, Secretariat of Communication, Secretariat of Government, Secretariat of Transport). The CIGA also took a part, as an advisory body, in the implementation. Two legislative institutions (São Paulo State Legislative Assembly and the Parliament School [Escola do Parlamento]) equally participated in implementing activities, as well as 34 other institutions: the Municipal Public Technology Company, the Municipal School of Public Administration of São Paulo, and the 32 Regional Prefectures (Sé, Itaim Paulista, Vila Maria/Vila Guilherme, M'Boi Mirim, Butantã, Ermelino Matarazzo, Jaçanã/Tremembé, Santana, Guaianases, Penha, Casa Verde, Ipiranga, Parelheiros, Itaquera, Mooca, Perus, Pirituba, Cidade Tiradentes, São Mateus, Sapopemba, Capela do Socorro, Cidade Ademar, Aricanduva/Vila Formosa, São Miguel Paulista, Campo Limpo, Lapa, Vila Prudente, Pinheiros, Jabaquara, Santo Amaro, Freguesia do Ó, and Vila Mariana).
[3] The Integrity and Good Practices Program (Programa de Integridade e Boas Práticas), recently launched by CGM, does mention OGP in its justification. See the internal call for applications (Edital de Chamamento Interno) No. 02/ SMJ/CGM/2017, from 26 October 2017.

Institutional and Subnational Context and Scope of Action Plan

This section places the action plan commitments in a broader context. The emphasis of the IRM report is on the development and implementation of the OGP action plan. However, to ensure the credibility of the report and of OGP more broadly and to inform future versions of the action plan, researchers are asked to briefly consider the institutional context within which the OGP action plan is framed. Here, researchers consider significant actions not covered by the action plan that are relevant to OGP values and the entity's participation in the Partnership. The emphasis should be on the specific subnational context. However, researchers may make some reference to the broader national context as it affects implementation at the subnational level (e.g., in county, referring to ward level; or in the municipality, referring to state and federal context).

Background

To understand how São Paulo led its first pilot OGP process, it is important to describe the different aspects of the city's governmental structure. The municipality of São Paulo is the capital of the São Paulo state in Brazil. The Brazilian federal system is divided, administratively, into 26 states, the federal district (the capital, Brasilia), and 5,570 municipalities. The municipality of São Paulo spans 1,521 kilometers, and 12 million people reside in the country's most populous city. São Paulo is also considered Brazil's financial center. It has the largest municipal gross domestic product (GDP) in the country, accounting for around 10 percent of the national GDP. In terms of GDP per capita, the city ranks 184th nationally.[4] Brazil is a founding member of the OGP, and the city of São Paulo has been, historically, one of country's innovation hubs for citizen participation and, more recently, open government.

Due to its size, since 2002, the municipality of São Paulo has been administratively divided into 32 regions and 96 districts. Each region has one Regional Prefecture (Prefeitura Regional), with an appointed regional mayor.[5] The regions have limited administrative and financial autonomy, their budgets being defined and allocated as part of the overall budget planning of City Hall. The regions do have shared administrative competency over public services locally, within their territories. Importantly, the degree of decentralization and devolution varies according to the service. For instance, urban cleaning and street maintenance (broadly referred to as *zeladoria*) fall under the responsibility of Regional Prefectures. Some other services, such as health and education, depend on the secretariats. Those secretariats coordinate their actions in the territory with Regional Prefectures.

Several 2016 and 2017 events affected São Paulo's participation in OGP.

Mayoral election of 2016: The São Paulo municipal government is elected through direct majoritarian polls for city mayor (*prefeito*), the executive branch, and proportional polls for the City Council (Câmara dos Vereadores), and the legislative branch. These entities serve four-year terms. The last municipal elections were held in October 2016. Thus, one administration (under Fernando Haddad, Partido dos Trabalhadores or Worker's Party, 2013–2016) created the city's OGP pilot action plan. And another (under João Dória, Partido da Social Democracia Brasileira, 2017–2020) implemented it.

Budget constraints and general administrative changes: Brazilian municipalities enjoy financial and administrative independence from the remaining federal entities (the Union and states). The federal

constitution of 1988 enshrines this freedom. Municipalities carry responsibility for a series of public services, including health services, education, and transportation. According to the constitution, the municipalities share some of this responsibility with the state. These responsibilities could also be dependent on federal transfers. São Paulo's budget comprises municipal taxes and transfers from the state and federal budgets. The Executive proposes the municipal budget. The city legislature approves the budget through a series of planning instruments: the Pluri-annual Plan, the Budget Guidelines Law, and the Annual Budget Law. The constitution mandates public hearings with local citizens as part of this process. During this pilot plan, São Paulo operated under fiscal restraint, intrinsically related to Brazil's national economic context.[6]

From the moment the action plan was drafted and approved until its implementation started in January 2017, a series of administrative changes took place. The newly elected government created new departments while dissolving others. It also approved multiple changes in personnel. The city budget suffered cuts from 2016 to 2017, severely affecting the human resources of open government initiatives. All Municipal Secretariats had their budget reduced in approximately 30%[7],The São Paulo Aberta Initiative, the most active implementing unit of the OGP action plan, went from 17 staff in 2016 to six in December 2017.[8] Due to budget limitations, the São Paulo Aberta website was shut down in January 2017. This negatively impacted the communication and outreach efforts of those leading the OGP action plan implementation (for more on this, see Commitment 3: Communication).[9]

São Paulo's open government agenda prior to OGP

São Paulo has been an innovation hub and driver of the institutionalization of citizen participation in government since the creation of "policy councils" in the late 1970s.[10] Experimentation remains a key dimension of the city's state-society relations.[11] These initiatives have involved continuous decentralization and power-devolution efforts, and short-lived participatory budgeting. Such efforts also led to the establishment of the Participatory City Council (Conselho da Cidade)[12] at the city level and 32 Municipal Participative Councils (Conselhos Participativos Municipais), in 2013, at the district level.[13]

Openly inspired by recent developments in the global open government agenda and by OGP,[14] the municipality of São Paulo started to build its own open government initiatives in 2013. The government institutionally formalized these initiatives in early 2014, through the Municipal Executive Decree 54.794/2014. This decree established the São Paulo Aberta Initiative and the Inter-Secretarial Committee of Open Government of São Paulo.[15] Among the main flagship initiatives developed under this umbrella is the pilot initiative Open Cabinet (Gabinete Aberto), included as one of Haddad's Mayor's Goals (2013–2016), and the pilot edition of the Open Government Agents Program (2015–2016). These open government initiatives complemented other institutional landmarks on access to information and public accountability undertaken simultaneously. The latter landmarks include the creation, in 2013, of the Office of the Municipal Comptroller (CGM), a control, auditing, and oversight body with secretarial status.[16] CGM promotes integrity, transparency, and citizen oversight of municipal public services.[17] In 2014, it also led the approval of a Municipal Access to Information Law.[18] An important outcome of this growing ecosystem of open-government-related policies and mechanisms lies in their multiplying effect.

Besides those overarching initiatives, most of them led or overseen by the São Paulo City Hall Cabinet, a series of smaller initiatives have been developing in the city. Thematic City Hall departments (secretarias), in partnership with civil society groups, lead sectorial hack days (hacketons), such as those hosted in 2013 on transport contracts. Sectorial open government and transparency policies, such as the

one led by the Health Secretariat, have been created. Municipal and state legislative powers (Câmara dos Vereadores and Assembleia Legislativa, respectively) have ushered in open data efforts.[19] Civil society has been equally active in open government virtual and physical spaces, organizing activities such as participatory budget conferences[20] and virtual citizen monitoring platforms.[21]

Since 2008, São Paulo's city mayors are also subjected to a performance-reporting program named City Mayor's Goals (Programa de Metas). Launched during the Gilberto Kassab administration (Partido da Social Democracia Brasileira, PSDB), the initiative originated from strong civil society mobilization. The Movimento Rede Nossa São Paulo championed the initiative through an amendment to the city law (Lei Orgância do Município). The City Mayor's Goals require incumbents to present their performance indicators up to 90 days after inauguration through public hearings. It also requires them to report advancements every six months.[22] During his mandate, Mayor Fernando Haddad (Partido dos Trabalhadores, or Worker's Party) expanded the initiative by introducing the Budget and Planning Participatory Cycle. This action merged performance reporting and participatory initiatives, such as public hearings in all city regions and virtual consultations. Mayor João Dória (PSDB) has also engaged in developing his own participatory process for building his goals. Dória's administration has downplayed the participatory budget component. However, it has prioritized virtual engagement with citizens through new virtual platforms and methodologies for citizens to express their dreams, concerns, and/or concrete suggestions for the City Mayor's Goals. The Dória administration has also included a series of open-government-related goals in his final targets for 2017–2020.[23] These include the five commitments from the OGP action plan (under Goal 49, Project 65), as well as other commitments on open City Hall data and integrity (under Goal 49 and Goal 50, Project 67, respectively).[24] Having open government commitments among the goals of the current administration's mayor increases salience of the agenda in the city. Consequently), with performance indicators and continuous monitoring, both OGP commitments and the other set of open-government-related activities have secured a longer implementation calendar (four years, rather than one).

Current challenges to consolidating open government in São Paulo

Despite these important landmarks, the concept of open government and participation—as well as its practices—has been under constant dispute in the city for decades. This has been the case not only between government and civil society, but also within government and between administrations. The year 2017 was particularly challenging. Disputes on oversight bodies started in early January 2017. Then, the new mayor announced he would rescind the Office of the Municipal Comptroller's (CGM) autonomous secretarial status and change its form to a division within the Justice Secretariat. The measure faced opposition, both from civil servants and from public policy experts. Thus, the CGM was left as an autonomous body. Later in August 2017, the municipal comptroller, Dr. Laura Mendes Amando de Barros, was discharged on the grounds of "administrative and operational matters" and "poor performance and lack of productivity."[25] Some civil servants interpreted this move as inconsistent with the transparency, integrity, and anti-corruption agendas in São Paulo.[26] A new comptroller, Dr. Guilherme Rodrigues Monteiro Mendes, former municipal general-ombudsman, replaced Dr. Mendes de Amando Barros. In October 2017, the CGM underwent administrative reforms. According to Vanessa Menegueti, a civil servant working for the Integrity Promotion Division/CGM, reforms are not expected to affect CGM's engagement in the open government agenda and in the OGP action plan.[27]

The current City Hall administration has also proposed a series of changes to local, neighborhood-based participatory institutions, namely the Municipal Participative Councils (Conselhos Participativos Municipais, CPMs), established in 2013 in all 32 Regional Prefectures. In August 2017, City Hall issued

Executive Decree 57.829/2017. The decree changed the CPMs' election rules. Among other changes, it changed the representation ratio and reduced the number of elected councilors per Regional Prefecture.[28] A few weeks before the decree was issued, another administrative measure had abolished the local participatory budget and planning councils (Conselhos de Planejamento e Orçamento Participativos). For a more extensive discussion of this decree and its initial impact on the CPMs' workings, see Commitment 1: Participation.

Moreover, the Dória administration's policy on transparency and access to information has been criticized. In November 2017, the local media raised concerns regarding implementation of the municipal access to information law. They denounced high-level authorities denying access to information to journalists based on their identity and/or motives, which violates core principles of the right to information. An official response from City Hall has denied acting on political grounds, and the authority involved in the case was subsequently discharged.[29] Civil servants from CGM (the body chairing the municipal access to information commission), contend this was an isolated case and does not reflect the overall commitment from City Hall on transparency and access to information.[30] Also in November 2017, the municipal legislative body (Câmara dos Vereadores) decided to exclude the names of civil servants from its open data portal, leaving only their internal identification number and salaries. Transparency experts believe this is another setback for higher transparency standards, in place since 2011.[31] Altogether, those recent developments point to the fragility of some open government breakthroughs carried out by reformers within and outside government in the last decade. They also illustrate the challenges of not only deepening but also sustaining the open government agenda in the city of São Paulo.

The São Paulo OGP pilot

São Paulo Aberta,[32] in close collaboration with the Integrity Promotion Division/Office of the Municipal Comptroller (CGM), leads the OGP pilot. A pilot initiative established in 2014, São Paulo Aberta currently operates under the Municipal Secretariat for International Relations (SMRI). Approximately 50 governmental institutions have participated in OGP action plan implementation, either in consultative or implementation capacities. During the plan development, in 2016, 17 civil servants (both full-time staff and interns) worked for São Paulo Aberta. By December 2017, this number was down to six people, including administrative staff. The initial budget allocated for the execution of all activities related to the OGP process, undertaken with the department's ordinary budget[33] within SMRI, was of R $450,000. The government reduced the budget to R $257,978.25 during the implementation phase. The initiative did not execute it all[34]. Some activities, such publishing an annual report on all activities, were not undertaken due to the overall implementation delays.[35] CGM also financially contributed to action plan activities through its own budget, particularly for Commitments 2 (Training) and 4 (Institutionalization). The OGP action plan is not legally mandated in São Paulo. However, the 2014 Municipal Executive Decree 54.794 supports the broader open government framework. That decree established the São Paulo Aberta Initiative and the Inter-Secretarial Committee of Open Government of São Paulo.[36] On the political level, the 2017–2020 City Mayor's Goals includes the five OGP commitments of this first pilot action plan.

Open government in Brazil

An OGP founding member, Brazil is currently implementing its third national action plan. The main body responsible for implementing the OGP agenda in the country is the Office of the General Comptroller (CGU), backed by the Inter-Ministerial Open Government Committee (CIGA). Engagement and

commitment from national institutions has broadened since 2011. Increasingly more line ministries and national public bodies have become involved in the process and take responsibility for reformist commitments. Levels of completion and impact have varied, nonetheless, and the country faces challenges in establishing meaningful government–civil society collaboration. Both parties have recognized those governance challenges and a series of initiatives were put forward to improve dialogue.[37]

Regarding the national political context, for the past two years, corruption scandals have been at the center of the national public debate. A severe political crisis at the federal level has had political implications for subnational entities. At the center of this crisis stands an ongoing, nationwide judicial criminal investigation known as Operation Car Wash. The investigators have brought charges against a series of top-ranking politicians and lawmakers from all major national parties, as well as businessman and members of the Judiciary. In 2016, Congress officially impeached elected president Dilma Rousseff (Partido dos Trabalhadores, or Worker's Party) on the grounds of having committed fiscal crimes. Politically, however, Rousseff was tied to corruption allegations against her party and predecessor, former president Luiz Inácio Lula da Silva (2002–2010).Importantly, several Congressmen were themselves under investigation or facing corruption charges. Her vice president—Michel Temer (Partido do Movimento Democrático Brasileiro), who assumed the presidency in April 2016 after Rousseff's suspension—also faces corruption charges. Due to high-level congressional support, he has been safe from prosecution, despite extremely high levels of popular discontent.

Amid this unstable political scenario, government decentralization of the open government agenda has been underway in the past years, with several cities adopting pilots of open government programs.[38] Brazil's third national action plan includes a commitment (number 12) focused on raising local awareness of open government and thus fosters open government at the subnational level.[39] Another sign of the growing importance of the agenda nationally are the National Open Government Summits (Encontro Nacional de Governo Aberto).[40] These summits gather participants from federal and subnational governments, academia, and civil society. During the first Encontro, held in 2016 in São Paulo,[41] the São Paulo City Hall officially presented its OGP action plan, and the federal government presented a draft version of its third national action plan.[42] The second summit, hosted in late November 2017, also took place in São Paulo.[43]

Stakeholder Priorities

The main priority for stakeholders in government and civil society who took part in the plan development process was to consolidate and strengthen the open government agenda in the city. They aimed to use the OGP umbrella (both the action plan and, more broadly, the OGP international exchange platforms) to consolidate and expand pilot initiatives, invest in capacity building within and outside government, and create an enabling environment for the open government agenda to take off. Informants also mentioned wanting to avoid setbacks from what they perceive as a highly volatile context, where emerging or incipient open government initiatives risk being discontinued.[44] Those actively implementing the action plan acknowledge a high degree of coherence in its crafting. They note the inevitable interconnectedness among the capacity building, outreach and communication, and institutionalization commitments. Still, during implementation, it became clear that stakeholders were particularly mobilized around two commitments: Commitments 1 and 4, Participation and

Institutionalization, respectively. Commitment 1 seeks to strengthen Municipal Participative Councils. Elected citizen councilors originated and proposed this commitment during the elaboration phase. This commitment has faced increased implementation challenges during the year. Commitment 4 aims to establish a civil servant network on access to information and open government, the Open INFO Network (Rede INFO Aberta). Stakeholders saw this commitment as a well-implemented initiative and one with great transformative potential. It could build an open government culture within City Hall and create space for the emergence of new open government initiatives in the future. Looking ahead to potential policy areas to prioritize in future action plans, informants suggested that citizen participation should remain a key priority. For reasons, they noted São Paulo's size and social diversity, and noted that existing mechanisms have not yet been consolidated. Stakeholders also prioritized improving official communication and outreach efforts on open government and open government policies and initiatives. Such efforts remain a building block for support for any other future sectorial commitment.[45] Stakeholders have also suggested future plans to engage more concretely with open government in service delivery. Stakeholders perceive those efforts as more connected with local development needs and aspirations, and can further impact citizens on the ground.[46] Stakeholders consider initiatives such as the Pátio Digital, from the Education Secretary, good examples of how to promote innovative citizen-responsive service delivery.[47]

Scope of Action Plan in Relation to Subnational Context

While it is not the job of the IRM to tell governments and civil society organizations what can or cannot be in action plans, the IRM Guiding Principles do require the IRM to identify "[t]he extent to which the action plan and its commitments reflect, in a certain subnational context, the OGP values of transparency, accountability, and civic participation, as articulated in the OGP Declaration of Principles and the Articles of Governance."

Considering the subnational and institutional context in which the city of São Paulo has developed and carried out its OGP commitments, this pilot action plan focus primarily on citizen participation (three commitments out of five). This focus also relates to Brazil and São Paulo's history of participatory democratic innovations[48] and persistent inequalities.[49] Sustained power and policy decentralization efforts took place in the last decades. Those have been accompanied by a series of important, but rather insufficient, governmental initiatives to increase citizen participation. These range from new formal participatory institutions, such as the Municipal Participative Councils in 2013, to the promotion of citizens' direct engagements through *multirões* (self-help schemes). They also include the more recent Cidade Linda and Bairro Lindo initiatives. As shown in the institutional and subnational contexts above, there exists a debate within and outside the municipal government on multiple, and often competing, visions on citizen participation models and structures. Citizen participation should, thus, remain a priority for São Paulo's action plans. However, the city could progressively invest in commitments that are able to reflect other OGP values in a combined and mutually reinforcing manner.

Also, OGP action plans could more clearly articulate the open government agenda within key policy sectors, such as health, education, housing, and transport, to name a few. In those sectors, City Hall can commit to open government through testing innovative institutional arrangements with nonstate actors, civil society movements, organized civil society, and the private sector. Those future sectorial commitments should build on the sectorial priorities raised during the public consultations for the City Mayor's Goals and further consolidated in the outcome document. As suggested by one Shared

Management Forum civil society representative, future commitments should also be more clearly articulated in other areas. These include ongoing efforts to municipalize the Sustainable Development Goals and a needed effort to integrate global debates, actors, and initiatives—such as the 2030 Agenda or OGP—with local development efforts.[50]

Finally, future action plans should include a stronger focus on public accountability, as expressed in more detail in the section on general recommendations.

[4] Those are 2014 official figures from the Brazilian Institute of Geography and Statistics. See "São Paulo," IBGE, https://cidades.ibge.gov.br/brasil/sp/São-paulo/panorama.

[5] During the plan elaboration, the 32 submunicipalities were referred to as *Subprefectures (Subprefeturas)*. This is the language found, for instance, in Commitment 1. In January 2017, the newly elected administration changed the name to Regional Prefectures. See "Regional Governments Replace old Subprefeituras," Prefeitura de São Paulo Prefeituras Regionais, http://www.prefeitura.sp.gov.br/cidade/secretarias/regionais/noticias/?p=227932.

[6] In early 2016, the city debt was, nonetheless, renegotiated with the federal government, making the city eligible for new loans in the future. See Artur Rodrigues, "With renegotiation, São Paulo's debt falls from R $74 billion to R $27.5 billion," *Folha de S. Paulo,* 26 February 2016, http://www1.folha.uol.com.br/cotidiano/2016/02/1743985-com-renegociacao-divida-da-cidade-de-sp-cai-de-r-74-bi-para-r-275-bi.shtml.

[7] Information provided to the IRM researcher by Ambassador Massot, from the SMRI and the São Paulo Aberta team during the IRM report review period, in May 2018.

[8]According to sources within City Hall, as of December 2017, the São Paulo Aberta team was made of four program-related civil servants and two administrative staff. During most of 2017, São Paulo Aberta had five working program-related staff. In 2016, 17 people worked for the initiative, according to civil servants consulted for this report. Interview with Fernanda Campanucci (15 May 2017), interview with Ana Dienstmann (7 August 2017), interview with Eduardo Barboza (7 August 2017), interview with Vanessa Menegueti (9 November 2017), interview with Ana Dienstmann and Eduardo Barboza (1 December 2017).

[9] Fernanda Campanucci, from the Secretariat of Education, also describes São Paulo's website going down as affecting other municipal open-government-related initiatives, such as virtual public consultations previously hosted online there (interview with Fernanda Campanucci, civil servant, 15 May 2017). Importantly, virtual consultations for the City Mayor's Goals (Programa de Metas) have been conducted through other independent virtual platforms exclusively created for that aim. The final version of the goals, with a formal feedback on proposals received, can be found at http://programademetas.prefeitura.sp.gov.br/. The current version of one of the virtual platforms used during consultation, PlanejaSampa, can be also see at http://planejasampa.prefeitura.sp.gov.br/.

[10] See Vera Schattan P. Coelho, Alexandre Ferraz, Fabiola Fanti, and Meire Ribeiro, "Mobilização e Participação: Um Jogo de Soma Zero?: Um Estudo sobre as Dinâmicas de Conselhos de Saúde da Cidade de São Paulo," *Novos Estudos - CEBRAP, São Paulo,* no. 86 (Mar. 2010): 121–139. Also see Vera Schattan P. Coelho, Marcelo F. Dias, and Felipe Szabzon, "Política Municipal e Acesso a Serviços de Saúde: São Paulo 2001-2012, Quando as Periferias Ganharam Mais que o Centro," *Novos Estudos CEBRAP*, 100 (2014): 139–161.

[11] CPMs are legally established in Municipal Law No. 15.764/2013.

[12] This council was discontinued after the end of Haddad's administration in December 2016.

[13] This expansion is mostly associated in the academic debate with the Workers Party city administrations (Luiza Erundina, Marta Suplicy, and Fernando Haddad). See, for instance, Pedro de Lima Marin and Ana Waksberg Guerrini, "Participação na Cidade de São Paulo: Do Orçamento Participativo ao Programa de Metas," *Revista Brasileira de Políticas Públicas e Internacionais – RPPI* 2, no. 1 (2017): 109–128.

[14] Interview with Gustavo Vidigal, former OGP point of contact (8 May 2017) and interview with Laila Belix, former COPI/CGM coordinator (2 June 2017).

[15] See Executive Decree 54.794/2014 on the Inter-Secretarial Committee of Open Government, http://www3.prefeitura.sp.gov.br/cadlem/secretarias/negocios_juridicos/cadlem/integra.asp?alt=29012014D%20547940000.

[16] The original executive decree establishing the CGM has granted the body with a secretarial-like status. In early 2017, the new administration proposed downgrading this status, subordinating the CGM to the Secretariat of Justice. This proposal suffered from internal and external opposition, and the CGM is currently legally autonomous.

[17] For more on the work of CGM since 2013, see Controladoria Geral do Município de São Paulo, Controladoria em Casos Experiências Inovadoras para o Combate à Corrupção e a Promoção da Integridade na Cidade de São Paulo (São Paulo: 2015), http://www.prefeitura.sp.gov.br/cidade/secretarias/upload/controladoria_geral/arquivos/CC_Final2.pdf.

18 In December 2012, the municipality of São Paulo issued a decree to implement the Federal Access to Information Law (12.527/2011). This decree was changed in January 2014 through another executive decree (54.779/2014) to encompass a broader range of mechanisms to promote and protect the right to information in the city. See "Decree No. 53.623," Local Laws, https://leismunicipais.com.br/a/sp/s/São-paulo/decreto/2012/5362/53623/decreto-n-53623-2012-regulamenta-a-lei-federal-n-12527-de-18-de-novembro-de-2011-no-ambito-do-poder-executivo-estabelecendo-procedimentos-e-outras-providencias-correlatas-para-garantir-o-direito-de-acesso-a-informacao-conforme-especifica.

19 For the municipal legislative, see "Open Data Program of Parliament," Camara Municipal de Sao Paulo, http://www.camara.sp.gov.br/transparencia/dados-abertos/. For the state legislative, see "Open Data Alesp," Open Data Portal of ALESP, https://www.al.sp.gov.br/dados-abertos/sobre;jsessionid=A51E8532CB9E0E321E23FDD194080E11.

20 See "Participate in the Citizen's Assembly on the Decentralization of the Budget of the City of Sao Paulo," Rede Nossa Sao Paulo, http://www.nossaSãopaulo.org.br/noticias/participe-da-assembleia-cidada-sobre-descentralizacao-do-orcamento-da-cidade-de-São-paulo.

21 See De olho nas Metas (http://deolhonasmetas.org.br/) for an example of citizen monitoring of the City Mayor's Goals. See ObservaSP (https://observasp.wordpress.com/) for an example of citizen monitoring of housing policies. See Gabinete 56 (https://www.facebook.com/gabinete56/) for an example of monitoring the municipal legislative. Other examples of citizen-led innovations in Latin America, including some happening in the city of São Paulo, mapped by the Update initiative can be seen at https://www.institutoupdate.org.br/explore/list.

22 See the city law at http://www.prefeitura.sp.gov.br/cidade/secretarias/upload/educacao/cme/LOM.pdf.

23 The final City Mayor's Goals (Programa de Metas) were made public in the *Official Gazette* in 18 July 2017: http://www.docidadesp.imprenSãoficial.com.br/NavegaEdicao.aspx?ClipID=7NPJCIF8EAMCAe1243NKD1LBPO7&PalavraChave=%22governo%20aberto%22. For a full version of the Goal's, see http://planejasampa.prefeitura.sp.gov.br/assets/Programa-de-Metas_2017-2020_Final.pdf.]

24 For more on CGM's ongoing efforts to promote transparency and open data in the city, beyond the OGP plan (such as anti-corruption hack challenges and a proposal for a municipal open data bill), see "CGM Participates in the Final Hack in Sampa," Prefeitura de Sao Paulo Controladoria Geral, 17 August 2017, http://www.prefeitura.sp.gov.br/cidade/secretarias/controladoria_geral/noticias/?p=239522. The government originally planned to introduce the bill to the City Council in November, but CGM decided to extend consultations. See the bill under discussion at http://www.prefeitura.sp.gov.br/cidade/secretarias/upload/PMTDA_Anteprojeto_%20final_18_04_2018.pdf.

25 Different media sources have covered the case. See, for instance Pedro Duran, "Mayor Joao Doria Decides to Dismiss General Comptroller of the Municipality of SP," *CBN,* 17 August 2017, http://cbn.globoradio.globo.com/São-paulo/2017/08/17/PREFEITO-JOAO-DORIA-DECIDE-DEMITIR-CONTROLADORA-GERAL-DO-MUNICIPIO-DE-SP.htm; Luiza Calegari, "Doria Exchange Command of the Comptroller, Who Supervises the City Hall," *Exame,* 17 August 2017, http://exame.abril.com.br/brasil/doria-troca-comando-da-controladoria-que-fiscaliza-prefeitura/; and Artur Rodrigues, "Doria Dismisses Parent to Name Management-Aligned," *Folha de São Paulo,* 17 August 2017, http://www1.folha.uol.com.br/cotidiano/2017/08/1910680-doria-demite-controladora-para-colocar-nome-alinhado-a-gestao.shtml?cmpid=compfb.

26 Views expressed by civil servants from São Paulo City Hall and shared with the IRM researcher under confidentiality. Critical media coverage on the government initial proposition to rescind the CGM's status can be seen in "Loss of Comptrollership Status in Management Doria Causes Apprehension," *Folha de São Paulo,* 9 November 2016, http://www1.folha.uol.com.br/cotidiano/2016/11/1830637-perda-de-status-de-secretaria-da-controladoria-em-sp-gera-apreenSão.shtml.

27 See "Diario Oficial de Cidade de Sao Paulo," http://www.docidadesp.imprenSãoficial.com.br/NavegaEdicao.aspx?ClipID=66D1L5F7N4J7ReCN3EJFK3OBC22&PalavraChave=%22governo%20aberto%22.

28 The new decree modifies the current ratio of one representative per 10,000 inhabitants to one representative per 30,000 inhabitants. See the full text of the decree 57.829/2017 at http://dobuscadireta.imprenSãoficial.com.br/default.aspx?DataPublicacao=20170815&Caderno=DOC&NumeroPagina=1. The decree has maintained, however, the rule of having at least one migrant representative as an extraordinary councilor in each of the Regional Prefectures. Migrant representation was first introduced in 2013, for those Regional Prefectures where migrants comprised at least 0.5 percent of the total population. In 2015, City Hall expanded migrant representation to all 32 Regional Prefectures.

29 See Luiz Fernando Toledo, "Management Doria Acts to Hamper the Law on Access to Information," *Estadao,* 8 November 2017, http://São-paulo.estadao.com.br/noticias/geral,gestao-doria-dificulta-acesso-a-dados-e-viola-lei-de-acesso-a-informacao,70002075921?utm_source=newsletter&utm_medium=email&utm_campaign=manchetes.

30 Interview with Vanessa Menegueti, civil servant from COPI/CGM (9 November 2017).

[31] See Artur Rodrigues, "Sao Paulo Chamber Hides Wages of Servers in Official Website," *Folha de S.Paulo,* 7 November 2017, http://www1.folha.uol.com.br/cotidiano/2017/11/1933395-camara-de-São-paulo-esconde-salarios-de-servidores-em-site-oficial.shtml.

[32] The São Paulo Aberta Initiative was born within the mayor's cabinet during Fernando Haddad's administration (2013–2016) and was led by Chief of Staff Gustavo Vidigal. Later, both Vidigal and the initiative were transferred to the International Relations Secretariat.

[33] The Municipal Budget Law, proposed by the Executive and approved in the Legislative, features budget allocation at the department level (at the secretariat level), rather than the project level. Nonetheless, in its initial bill for fiscal year 2018, City Hall plans to allocate R $290,000 for open-government-related issues under the responsibility of the SMRI. See "Consolidado Geral," Diaro Oficial da Cidade de Sao Paulo, http://www.docidadesp.imprenSãoficial.com.br/NavegaEdicao.aspx?ClipID=0O4OJ845PEBVCeDJA1CU85K72LK&PalavraChave=%22governo%20aberto%22.]

[34] Information obtained through interviews with São Paulo Aberta civil servants in December 2017 and through communications with SMRI during the IRM report review period, in May 2018.

[35] Interview with Ana Dienstmann and Eduardo Barboza, civil servants at the SMRI/São Paulo Aberta Initiative (1 December 2017).

[36] See "Executive Decree 54.794/2014 on the Inter-Secretarial Committee of Open Government," City Hall of the City of Sao Paulo, http://www3.prefeitura.sp.gov.br/cadlem/secretarias/negocios_juridicos/cadlem/integra.asp?alt=29012014D%20547940000.

[37] See the full IRM report at "Brazil End-of-Term Report 2013-2016," Open Government Partnership, https://www.opengovpartnership.org/documents/brazil-end-of-term-report-2013-2016.

[38] For example in cities like São Sebastião/SP and Teresina/PI. For more examples, see "To Solve a Problem, We Need to Know It First: Using the Local Democracy Index as a Guide for Reforms," Open Government Partnership, https://www.opengovpartnership.org/stories/solve-problem-we-need-know-it-first-using-local-democracy-index-guide-reforms.

[39] See "Commitment 12: Subnational," Open Government Partnership, Brazil Federal Government, http://www.governoaberto.cgu.gov.br/noticias/2017/copy2_of_compromisso-12-subnacionais.

[40] The second edition is organized by both government institutions and civil society organizations, such as Imaflora, ARTIGO 19, Agenda Pública, Open Knowledge Brasil, Colab/USP, Nic.br/Ceweb, Ministério da Transparência e Controladoria Geral da União (CGU), Controladoria Geral do Município de São Paulo, and São Paulo Aberta.

[41] Organizers for this first edition included ARTIGO 19, Imaflora, Núcleo de Informação e Coordenação do Ponto Br (NIC BR), Open Knowledge Brasil, Colab/USP, o Ministério da Transparência, and Fiscalização e Controle e Prefeitura de São Paulo. Another Brazilian CSO, Inesc, also supported the event.

[42] See "National Open Government Meeting," Open Government Partnership, Brazil Federal Government, http://www.governoaberto.cgu.gov.br/noticias/2016/i-encontro-brasileiro-de-governo-aberto.

[43] See the full program in "Programming," II Encontro Brasileiro de Governo Aberto, https://2encontrogovernoaberto.wordpress.com/programacao/. A picture of one of the roundtables can be seen in the "São Paulo_ IRM Repository of Evidences" folder, available at https://goo.gl/EjVKM9.

[44] Focus group with São Paulo Aberta and CGM civil servants (4 May 2017); focus group with CSOs of the Shared Management Forum (18 May 2017); interview with Gustavo Vidigal, former OGP point of contact (8 May 2017); interview with Laila Belix, former COPI/CGM coordinator (2 June 2017); interview with Haydee Svab from Transparência Hacker (23 November 2017).

[45] Interview with Haydee Svab (23 November 2017).

[46] Interview with José Adão from PIDS (15 November 2017).

[47] Interview with Haydee Svab from Transparência Hacker (23 November 2017), interview with Joara Marchezini and Caroline Burle from RETPS (21 November 2017), interview with Vitor Cipriano de Fazio and Bruno Martinelli from the Secretariat for Innovation and Technology (1 September 2017), and interview with Vanessa Menegueti from CGM (9 November 2017).

[48] See Vera Schattan Pereira Coelho, "A Brief Reflection on the Brazilian Participatory Experience," *Journal of Public Deliberation* 10, no. 1 (2014): Article 18, https://www.publicdeliberation.net/jpd/vol10/iss1/art18.

[49] See Rede Nossa São Paulo, *Mapa da Desigualdade 2017* (São Paulo: Rede Nossa São Paulo, 2017), http://www.nossaSãopaulo.org.br/portal/arquivos/mapa-da-desigualdade-2017.pdf.

[50] Interview with José Adão from PIDS (15 November 2017).

Development Process and Monitoring of the Action Plan

Process of Development of the Action Plan

Governments participating in OGP follow a process for consultation during development of their OGP action plan and during implementation. This section summarizes the performance of São Paulo during the development of its first pilot action plan.

OGP Basic Requirements

Subnational governments received the following guidance on participation during action plan development and execution:

"May – November 2016: Development of commitments: Participants set up ways to work with civil society organizations and other groups outside government and use these mechanisms to identify priority areas for commitments. Specific commitments should then be developed in partnership with civil society, allowing them the opportunity to support governments in drafting them and establishing milestones. Draft commitments should be shared with the OGP Support Unit as they are being developed and for comment and advice in October – November. Commitments should be finalized and agreed by the end of November, so they can be published and announced at the OGP Summit in December."

The São Paulo municipal government met all but one of the OGP basic requirements during its action plan development. Despite the tight calendar and pre-municipal elections atmosphere, the government established a mechanism to work with civil society organizations in the formulation of the action plan.

Aspiring to make participation the central piece of the action plan development and implementation processes, the government of São Paulo called two open meetings. These served (i) to introduce the OGP to a broader range of municipal stakeholders and engage them in the process of creating a shared governance for the subnational pilot and (ii) to define a work plan for the action plan development.[51]

The São Paulo Aberta Initiative (Open São Paulo Initiative), a pilot project launched by the São Paulo City Hall in January 2014,[52] currently operates within the Municipal Secretariat for International Relations. The initiative aims to decentralize and foster the open government agenda at the municipal level.[53] It works with the Office of the Municipal Comptroller (CGM) through the CGM Integrity Promotion Division (COPI).[54] The São Paulo Aberta Initiative designed a roadmap for the action plan co-creation process.[55] The first step involved electing civil society organizations (CSOs) to partner with government in co-managing the development and execution of the action plan. This co-management would be done through the Shared Management Forum (the Forum). The São Paulo Aberta and COPI/CGM teams designed the voting process, relying on inputs from civil society representatives received during the two open introductory meetings.[56] An administrative decree by the Inter-Secretarial Open Government Committee[57] has subsequently formalized the Forum's composition and election criteria. According to the decree, both the São Paulo City Hall, through representatives from São Paulo Aberta and the COPI, and a group of elected CSOs have seats on the Forum. Twenty-two CSOs registered to participate either as candidates or voters. On 12 September 2016, the voting day, eight

organizations presented themselves as candidates. Ten civil society representatives were present in the official voting meeting and agreed to accept all the candidates to the Forum.[58] Through the Forum, the elected CSOs and government representatives from the São Paulo Aberta Initiative and the COPI/CGM carried out a participatory process for the development of the action plan. That process involves three main phases:

(i) *Diagnosis phase:[59]* The São Paulo City Hall conducted surveys with citizens (online and offline) and CSOs to map open government gaps in the city and identify priority areas for commitments.

(ii) *Commitments drafting phase:* The Forum organized three open face-to-face workshops[60] and a virtual consultation to draft the action plan commitments.

(iii) *Virtual voting phase:* The Forum led an online poll from 26 October to 26 November 2016 to select five commitments from the proposals they designed during the drafting phase.[61]

The Forum clustered the 16 commitment proposals drafted by civil society during the in-person consultations around five priority areas. These areas represent participation, capacity and knowledge building, communication, institutionalization, and open data and technology. During the virtual voting, each voter chose five commitments, one for each theme. This methodology, agreed upon by the Forum members, aimed to guarantee the action plan's overall thematic diversity.[62] According to Joara Marchezini, a civil society representative from Rede pela Transparência e Participação Social (RETPS), because of the lack of time, the Forum drafted most of the commitment milestones without further open citizen consultations.[63] (RETPS is an umbrella network of CSOs and a Forum member.) Nonetheless, the II National Open Government Summit hosted debated on the milestones. Held on 29 November 2016, the meeting gathered around 230 people in São Paulo.[64]

The stakeholders submitted São Paulo's final action plan at the end of November without it being officially reviewed by the OGP Support Unit. According to Gustavo Vidigal, the OGP point of contact during the action plan development process, the municipality opted to continue engaging with civil society members for a longer period of time. Thus, it missed the OGP Support Unit review deadline. However, there had been informal exchanges between government representatives and the Support Unit on the proposed commitments prior to the plan's completion and submission.[65] In June 2017, the São Paulo government submitted a revised version of its plan, with an updated version of its fifth commitment.[66]

Table 5. Basic Requirements

1. **Participatory Mechanism:** Was there a way of working with CSOs and other groups? Guideline: Participants set up ways to work with civil society organizations and other groups outside government and use these mechanisms to identify priority areas for commitments.	Yes
2. **Priority Identification:** Was civil society able to help identify priority areas for commitments? Guideline: Specific commitments should then be developed in partnership with civil society, allowing them the opportunity to support governments in drafting them and establishing milestones.	Yes
3. **Commitment Development:** Did civil society participate in the development/drafting of commitments and milestones?	Yes

4. **Review:** Were commitments submitted for review to the Open Government Partnership Support Unit prior to finalization?	Yes
5. **Submission:** Were commitments submitted on time?	No

Openness of Consultation

Who was invited?

The government opened consultations to a wide range of stakeholders, including civil society organizations (CSOs), social movements, academia, municipal public servants, and citizens in general. Gustavo Vidigal, former São Paulo Aberta coordinator, and Laila Belix, former Integrity Promotion Division (COPI)/ Office of the Municipal Comptroller (CGM) coordinator at the time of the action plan development, confirmed information for the IRM researcher. They noted that as soon as the government decided to submit its candidacy for the OGP Subnational Pilot Program, it proactively reached out to organized civil society representatives, including grassroots movements. The government aimed to include CSOs as active players in the process from the start.[67] Those invited to the first introductory meetings in August 2016—the largest one named "Dialogues on OGP Action Plan"[68]— were mostly CSOs already working on transparency matters, academics, and local social movements working on issues such as racial equality, health, and housing.[69] The Shared Management Forum's (the Forum) CSOs members believe the initial turnout for this first meeting was considerably high.[70]

The government set a priority to extend participation beyond the "usual suspects" (organizations that are known to actively participate in issues related to transparency and open government).[71] To this end, the São Paulo Aberta and COPI/CGM teams hosted additional introductory meetings with social movements to encourage them to participate and integrate them into the Forum.[72] To engage a broader spectrum of São Paulo's diverse civil society, the government also hosted three face-to-face workshops in a decentralized manner (downtown, West Zone, and East Zone).[73] The government also invited local councilors and those who worked as training agents for the first Open Government Agents Program (2015–2016) to these consultations. (Local councilors are elected citizen and civil society representatives taking part in existing participatory structures.) City Hall also carried out virtual consultations during the commitments drafting phase to engage individuals directly, without the mediation of organized local groups.[74] These virtual consultations are explained in more detail in subsequent subsections.

How was awareness raising carried out?

Both government and civil society representatives agree that time was short for a comprehensive awareness-raising process, due to the 2016 pre-electoral context in São Paulo. Electoral rules also

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limited public agents' use of their widespread official communication channels to invite people to the consultations.[75] Informants in both government and civil society believe this negatively impacted the whole process.[76] To circumvent associated challenges, the government strategically sent invitations through existing networks of the two City Hall bodies leading the process (São Paulo Aberta and the Integrity Promotion Division). It also invited stakehodlers through the Shared Management Forum's (the Forum) civil society organization (CSO) networks.[77] These invitations primarily targeted already mobilized groups and those that previously engaged with municipal open government initiatives.

Stakeholders who participated in the open introductory meetings were not informed about the overall timelines, since the government had not set the final methodology (and the specific rules) for the consultation process. Once the Forum agreed on the process phases, the group publicized a general invitation to the consultations, including an overall flow for the whole process. However, it lacked a specific timeline with dates.[78] The group disseminated all invitations to online and offline activities to identify priorities, propose commitments, and select commitments through the aforementioned government and CSOs networks. The group made these consultations open to public participation. The Forum also informed those who attended the face-to-face workshops about the consultation next steps, the virtual voting phase.[79]

Which parts of civil society participated?

A diverse range of actors participated in the consultation process for the formulation of the São Paulo action plan. They included civil society organizations (CSOs), social movements, academia, City Hall public servants, and citizens in general. Most participants in the commitments drafting phase hailed from organized civil society and local social movements, including:

- CSOs already working on transparency and accountability, such as Rede pela Transparência e Participação Social,[80] Transparência Brasil, Movimento Nossa São Paulo, and Instituto Ethos;
- CSOs working on cultural and environmental issues, such as SOS Mata Atlântica;
- Grassroots groups, (i.e., neighborhood associations and health-related movements), such as the Associação Cultural Morro do Querosene and the Movimento Popular de Saúde (Popular Health Movement); and
- Local councilors (citizens taking part in district-based thematic participatory councils).

Organizations elected to the Shared Management Forum (Forum) actively participated during the whole process, in all phases. They also had significant decision-making powers. The Forum formally met six times during the process.[81] Representatives from the Forum's CSOs have mentioned being constantly in touch with government representatives to contribute to a series of operational decisions, even beyond formal meetings.[82]

São Paulo Aberta official attendance sheets[83] account for:

- 26 civil society representatives attending the first open meeting;[84]
- 41 civil society representatives attending the three decentralized face-to-face commitments drafting workshops (mainly CSOs and local social movements, but also a few elected councilors of local participatory bodies and non-affiliated or autonomous citizens);
- 34 civil society representatives participating in the online consultation; and
- 711 civil society representatives voting online to select the final commitments.[85]

Consequently, the final participation list is significantly diverse, encompassing actors such as academics, local councilors, and nontransparency CSOs, as well as independent individuals. Forum representatives believe consultation was a success, considering the time, resources, and the electoral context. Both the CSOs from the Forum and the government representatives from the São Paulo Aberta and Integrity Promotion Division/Office of the Municipal Comptroller agree the process could have engaged broader participation. For instance, the group could have engaged larger numbers of participants in the face-to-face regional workshops[86] and more diverse participation. Including, for instance, a broader range of neighborhood associations, cultural movements, and youth movements would have made the process more representative of the plurality of actors in São Paulo. Civil servants involved in the action plan development process noted that the online platforms circumvented electoral restrictions on official communication channels.[87] However, they also noted that limiting the voting phase to those online tools might have excluded potential participants in a city where e-participation is not the standard.[88] Still, the overall assessment is that the process was highly participatory.[89]

Level of Public Input

The IRM has adapted the International Association for Public Participation (IAP2) "Spectrum of Participation" to apply to OGP.[90] This spectrum shows the potential level of public influence on the contents of the action plan. In the spirit of OGP, most countries should aspire for "collaborative."

The IRM researcher believes that the process to formulate São Paulo's first action plan was collaborative. Throughout the three stages of the consultation process, there was iterative dialogue between government members and a set of representatives from civil society organizations (CSOs) elected to the Shared Management Forum (the Forum). The Forum had decision-making powers over most parts of the process, including:

    (i)   diagnosis phase: contributing to redefining the diagnosis methodology;

    (ii)   priority identification: designing the workshop's methodology to identify thematic areas for commitments;

    (iii)   face-to-face workshops: choosing location, acting as moderators, and consolidating the inputs received; and

    (iv)   final drafting phase: creating criteria to choose the final five commitments to make the final action plan comprehensive and diverse (embracing a wide range of OGP thematic areas).

Through interviews, the IRM researcher confirmed that Forum members (civil society and government representatives) believe the development of the plan was highly participatory, a true co-creation process. However, they also agree that in a different national and municipal context, with more time, participation could have been greater in number and in diversity, particularly from citizens at large and CSOs that were not within the structure of the Forum.

Indeed, areas of the process could have been more participatory. Important leads in this are come from the Forum members and other CSO representatives who were consulted on or involved in the consultation phase. These informants may have been, for instance, involved either through the face-to-face workshops or in the online voting. A CSO representative who participated in a face-to-face workshop missed subsequent formal feedback to participants regarding their inputs, although the representative confirms being invited to the final virtual voting phase.[91] This representative also felt moderators restricted participants' suggestions in the name of feasibility or scope. Forum members from civil society and City Hall consulted by the IRM researcher acknowledge their methodology framed the

process as one that would lead to the creation of feasible, cross-cutting, and structuring commitments. They provided this frame rather than leaving it completely open to citizens, which would have led to the creation of other types of commitments, such as the highly specific sectorial ones.[92] On the other hand, guidelines followed by moderators clearly articulated the session was a safe environment for citizens to express themselves.[93] Also, while reviewing the online votes and deciding on the final action plan commitments, Forum members did not alter the original language from citizens. Overall, those mixed accounts reveal an intention by those leading the process in São Paulo to create an inclusive action plan development process with high levels of public input. This process can still benefit from implementation improvements in future years, as recognized by government members and CSOs.

Table 6. Level of Public Input

Level of public input		During development of action plan
Empower	The government handed decision-making power to members of the public.	
Collaborate	There was iterative dialogue AND the public helped set the agenda.	✔
Involve	The public could give feedback on how commitments were considered.	
Consult	The public could give inputs.	
Inform	The government provided the public with information on the action plan.	
No Consultation	No consultation	

[51] Focus group with São Paulo Aberta and CGM civil servants (4 May 2017); focus group with CSOs of the Shared Management Forum (18 May 2017); interview with Gustavo Vidigal, former OGP point of contact (8 May 2017); and interview with Laila Belix, former COPI/CGM coordinator (2 June 2017).
[52] See Executive Decree No. 54.794 from 28 January 2014, which institutionalizes the initiative and establishes a municipal open government inter-secretarial committee:
http://www3.prefeitura.sp.gov.br/cadlem/secretarias/negocios_juridicos/cadlem/integra.asp?alt=29012014D%20547940000
[53] For more on the initiative, see São Paulo Aberta, *Memória da Iniciativa São Paulo Aberta* (São Paulo: December 2016), https://issuu.com/anadferraz/docs/livro_sp_aberta.
[54] The Integrity Promotion Division is a division of the São Paulo Office of the Municipal Comptroller, which is in charge of integrity promotion. The office is the main body in charge of overseeing the implementation of the municipal access to information law, particularly its active and passive transparency dimensions. It has also a division to foster citizen oversight on transparency and integrity issues.
[55] See the first version of this roadmap in São Paulo Aberta's "Diagnosis Results Presentation" folder in the "São Paulo_ IRM Repository of Evidences" folder, available at https://goo.gl/EjVKM9 http://bit.ly/2v0fBYy. For the final version of the roadmap, with the exact steps included in the consultation, see "Figure 1 - Action Plan Development Roadmap" also in in the "São Paulo_ IRM Repository of Evidences" folder.
[56] See attendance sheet for Open Meeting "Diálogo sobre Plano de Ação da OGP" (8 May 2016) in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.
[57] See CIGA's Resolution No. 1 from 25 August 2016, in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.

[58] Although there were only six seats originally planned for CSOs, there was an agreement on the election day between all those present to expand this number to eight. The following organizations were elected to the Forum in September 2016: Associação de Projetos Integrados e Desenvolvimento Sustentável – PIDS, Laboratório Brasileiro de Cultura Digital (LabHacker), Liga Solidária, Movimento Popular de Saúde, Open Knowledge Brasil, Rede pela Transparência e Participação Social – RETPS, Transparência Brasil, and WRI Brasil Cidades Sustentáveis.

[59] The diagnosis phase consisted of (i) surveys handed out to citizens participating in Open Government Training Programs, (ii) online surveys, and (iii) surveys handed out to CSOs. Altogether, City Hall received 429 responses to the citizen's survey and 35 responses to the CSO survey. The Forum analyzed and systematized the results to inform the commitments drafting phase. See São Paulo Aberta's "Diagnosis Results Presentation" in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.

[60] For the official invite to the face-to-face workshops, see "Figure 2 - Action Plan Development Consultations Invite" in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.

[61] For an official flyer from São Paulo City Hall with all the action plan development phases, see "Figure 1 - Action Plan Development Roadmap" in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.

[62] Interview with Joara Marchezini (20 April 2017); focus group with São Paulo Aberta and CGM civil servants (4 May 2017); focus group with CSOs of the Shared Management Forum (18 May 2017); interview with Gustavo Vidigal, former OGP point of contact (8 May 2017); and interview with Laila Belix, former COPI/CGM coordinator (2 June 2017).

[63] Interview with Joara Marchezini (20 April 2017).

[64] According to Vanessa Menegueti, public servant from the CGM, this occasion featured an activity where participants were divided in groups, and each debated one commitment and a Forum proposal for the milestones. Participants' feedback was debated and their suggestion was taken into account by the Forum when finalizing the milestones' language.

[65] Information provided by Brittany Lane, program manager, Subnational Pilot Program, Open Government Partnership Support Unit; and by Gustavo Vidigal, former São Paulo Aberta coordinator (June 2017).

[66] A more in-depth explanation on that will be presented in the commitments' assessment section.

[67] Interviews with Gustavo Vidigal (8 May 2017) and Laila Belix (2 June 2017), former City Hall civil servants.

[68] São Paulo City Hall, attendance sheet, "Diálogo sobre o Plano de Ação da OGP" (8 May 2016).

[69] It is worth recalling that the open government agenda has existed in the city since at least 2013 and has depended on a significant amount of exchange among governmental and nongovernmental actors. The Workers Party administration also brought on board those in its existing network of interlocutors in social movements.

[70] Focus group with civil society representatives from the Shared Management Forum.

[71] Interviews with Gustavo Vidigal (8 May 2017) and Laila Belix (2 June 2017), former City Hall civil servants; and focus group with current COPI/CGM and São Paulo Aberta public servants (4 May 2017).

[72] The attendance sheet for the additional meeting with social movements, held subsequently—according to the main civil servants in charge of developing the action plan during the previous administration, Gustavo Vidigal and Laila Belix—could not be retrieved. Nonetheless, those groups were effectively integrated into the following consultation phases, as shown in the remaining attendance sheets to which the IRM researcher was given access.

[73] See the IRM online repository for the consultation invite. The initial idea was to host face-to-face meetings in all the five city regions. See the "Diagnosis Results Presentation" in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy. For feasibility reasons, the workshops were held in only three regions. Forum members have expressed frustration about not having enough time to host more face-to-face consultations and workshops in other city regions.

[74] Interview with Gustavo Vidigal (8 May 2017).

[75] Interviews with Gustavo Vidigal (8 May 2017) and Laila Belix (2 June 2017), former City Hall civil servants; interview with Fernanda Campanucci, civil servant (15 May 2017).

[76] Focus group with São Paulo Aberta and CGM civil servants (4 May 2017); interviews with Gustavo Vidigal (8 May 2017) and Laila Belix (2 June 2017), former City Hall civil servants; interview with Fernanda Campanucci, civil servant (15 May 2017); focus group with civil society representatives from the Shared Management Forum (18 May 2017).

[77] Focus group with São Paulo Aberta and CGM civil servants (4 May 2017).

[78] See "Figure 1 - Action Plan Development Roadmap" in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.

[79] Interview with Paula Oda, Instituto Ethos (19 July 2017).

[80] RETPS is a network and an umbrella platform gathering around 30 organizations working on citizen participation, transparency, and accountability in Brazil. The Brazilian Access to Information Law, budgetary transparency, and the OGP are among the network's main thematic priorities.

[81] São Paulo City Hall Repository and World Resources Institute, "São Paulo Escolhe seus Compromissos para o Plano de Ação de Governo Aberto," 11 January 2016, last accessed 21 June 2017, http://wricidades.org/noticia/s%C3%A3o-paulo-escolhe-seus-compromissos-para-o-plano-de-a%C3%A7%C3%A3o-de-governo-aberto.

[82] Focus group with civil society representatives from the Shared Management Forum (18 May 2017).

[83] Figures from the São Paulo City Hall. The figures for the face-to-face consultations presented here vary slightly from the ones presented by City Hall. The IRM researcher has avoided the latter, as it double counted individuals who participated in more than one meeting. City Hall representatives were also excluded from this count. Nonetheless, attendance sheets reveal that 11 City Hall public servants attended the face-to-face consultations, and 12 were present in the first opening meeting in August 2016.

[84] The attendance sheet for the additional meeting with social movements, held subsequently—according to the main civil servants in charge of developing the action plan during the previous administration, Gustavo Vidigal and Laila Belix—could not be retrieved.

[85] São Paulo Aberta, *Memória da Iniciativa São Paulo Aberta* (São Paulo: December 2016), https://issuu.com/anadferraz/docs/livro_sp_aberta. A full version is also available in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.

[86] Interview with Laila Belix, former COPI/CGM coordinator (2 June 2017).

[87] Interview with Fernanda Campanucci, civil servant (15 May 2017) and with Laila Belix, former COPI/CGM coordinator (2 June 2017).

[88] Focus group with São Paulo Aberta and CGM civil servants (4 May 2017).

[89] Focus group with civil society representatives from the Shared Management Forum (18 May 2017).

[90] See "IAP2's Public Participation Spectrum," IAP2, http://c.ymcdn.com/sites/www.iap2.org/resource/resmgr/foundations_course/IAP2_P2_Spectrum_FINAL.pdf.

[91] Interview with Paula Oda, Instituto Ethos (19 July 2017).

[92] Focus group with civil society representatives from the Shared Management Forum (18 May 2017).

[93] See "Guidelines to the Workshops" in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.

Process of Monitoring Implementation of the Action Plan

OGP Basic Requirements

Subnational governments received the following guidance on participation during action plan development and execution:

"December 2016 – December 2017: Implementation of Commitments

The guidance below provides more information about the best way to manage implementation of commitments, internal reporting and consultation with civil society throughout.

- Commitments should be developed in partnership with civil society and should seek to engage the widest possible input from citizens. This note provides guidance about how to conduct successful engagement with civil society and provides advice about ongoing consultation with civil society.
- Governments should conduct regular internal assessment, to make sure that commitments are on track and that there is an ongoing role for civil society. This assessment should be carried out along the lines of the OGP template for self-assessment, to make it easier for the IRM researcher to gather information.
- At regular intervals governments should publish a brief update on progress against commitments and use that as an opportunity to invite any comments. To complement any tracking system, governments are strongly encouraged to maintain a public, online repository of all documents giving evidence of consultation and implementation of commitments."

The São Paulo government complied with most of OGP's basic requirements, with few exceptions, to allow multi-stakeholder participation during the implementation of the action plan.

The Inter-Secretarial Committee of Open Government's Resolution No. 1 formally established the Shared Management Forum (the Forum; for more, see the Process of Development of the Action Plan section). It also provided the institutional structure for civil society to monitor the implementation of the action plan. Unlike for the consultation process, the Forum did not define a clear roadmap or timeline for monitoring the implementation process. Forum members negotiated an initial framework for collaboration in the initial implementation meetings in early 2017. The members agreed to establish thematic working groups for Forum civil society organizations (CSOs) to closely monitor and contribute to the implementation of each of the commitments.[94] CSOs clustered themselves into one or more subgroups, according to their expertise and interests. The Forum did not discuss precise role division between civil society and government, and among CSOs. Thus, the group did not have a clear set of roles for each member.[95] Eventually, conflicting expectations of what those roles were or should have been generated some frustration on both sides, particularly during the more intense and demanding implementation times.

Through the Forum, the government conducted regular internal assessments to ensure an ongoing role for civil society in monitoring the action plan implementation. The Forum later invited additional civil servants from City Hall who were closely involved in co-implementing OGP-related commitments.

The Forum hosted monthly general meetings during the implementation phase (a total of eight meetings between February and December 2017[96]). There, São Paulo Aberta and Integrity Promotion Division

(COPI)/Office of the Municipal Comptroller (CGM) representatives reported the progress on each commitment. The remaining Forum members discussed the updates. In the minutes, the group registered the agenda, brief summaries of the topics discussed, and relevant action points. The government made the minutes available to all Forum members through an online, nonpublic internal repository of working documents related to the OGP action plan. The government gave access to this online working tool to all Forum members and the IRM researcher. Commitment working groups also hosted their own meetings. During the first months of implementation, most working groups met regularly, roughly two or three times a month, based on each commitment's specific needs.[97]

The government did not systematically provide printed or published updates on the commitments' progress to the public. The exceptions lie in communication activity ordinarily carried out through São Paulo Aberta, COPI/CGM, and City Hall's regular communication vehicles, including social media. There existed no online public repository for OGP-related actions throughout implementation. There were no formal face-to-face meetings where the São Paulo government accounted for progress in implementing the action plan to a larger constituency. Thus, all public updates came either as part of São Paulo Aberta and COPI/CGM teams' speeches in open-government-related activities or from those elected CSOs attending the Forum meetings. In December 2017, however, the government proactively sought to report back and be accountable to the public by issuing a final report of its overall progress on the pilot action plan.[98]

Table 7. Basic Requirements

1. Internal Assessment & Participatory Mechanism:
 	
   a. Did the government conduct regular internal assessments?
   b. Did the government ensure an ongoing role for civil society in monitoring of the action plan?
	1.a
	Yes

Guideline: Governments should conduct regular internal assessment, to make sure that commitments are on track and that there is an ongoing role for civil society.	1.b Yes

2. Regular Updates & Opportunity to Comment:
 	
   a. Did the government publish updates on progress at regular intervals? [at least once every four months]
   b. Were civil society organizations provided the opportunity to comment on progress of commitment implementation?
	2.a
	No

Guideline: At regular intervals governments should publish a brief update on progress against commitments and use that as an opportunity to invite any comments.	2.b Yes
3. Online Repository: a. Did the government create a public online repository of documents? Guideline: To complement any tracking system, governments are strongly encouraged to maintain a public, online repository of all documents giving evidence of consultation and implementation of commitments.	3.a No

Openness during implementation

Who Was Invited?

The government invited eight civil society organizations, those elected to the open government Shared Management Forum (the Forum), to monitor the implementation of the action plan. The government organized no other formal open consultation, either targeted to organized civil society or to the public and citizens in general. Civil society organizations (CSOs) from the Forum have discussed broadening and bringing new voices to the Forum. They suggest, for instance, holding new elections and drafting a clear internal procedures guide to clarify Forum CSO responsibilities.[99] However, but none of the CSOs' proposals went forward.

How Was Awareness Raising Carried Out?

The Shared Management Forum's (the Forum) government and civil society representatives agreed on meeting dates, times, and agendas during implementation (monthly general meetings and commitment working group meetings). These agreements normally followed the lead of the government. The government emailed proposed dates and agendas.

The group made no further efforts to formally broaden participation from civil society and citizens during the monitoring of the action plan's implementation. It did communicate in an informal and less systematic way. Since both Commitments 1 (Participation) and 2 (Training) had strong, public-facing elements, civil society organizations from the Forum and those implementing these activities (either from City Hall or the Open Government Agents Program) attempted to communicate the action plan. Whenever possible, they would attempt to draw a clear picture of how the commitments' activities connected to a broader open government agenda in the city. They also tried to communicate how this agenda fit into a broader international platform—the OGP—and how those commitments had also been included in the City Mayor's Goals for 2017–2020. Consequently, the commitments' activities themselves served as, albeit limited, potential awareness-raising, outreach, and socializing moments for the action plan.

Which Parts of Civil Society Participated?

Civil society organizations (CSO) elected to the Shared Management Forum (the Forum) actively participated in government planning, implementation, and internal assessment. They operated both in a monitoring capacity and in a co-implementing one.

All Forum meetings took place in City Hall premises, during normal weekly business hours[100]. As the year progressed, this arrangement proved not fully convenient to all CSO representatives.[101] From the original eight CSOs elected to the Forum in August 2016, only four remained fully active throughout the year to co-implement and monitor commitments.[102] The other four did not participate in the monthly Forum meetings, in the working groups, or in other OGP commitment-related activities.[103] Some individual representatives engaged in indirect or issue-based monitoring. Some representatives justified their limited participation or progressive disengagement by citing agenda incompatibility, inability to attend face-to-face meetings in City Hall during work hours, or changes in political and strategic priorities following the 2016 municipal elections.[104]

São Paulo Aberta maintained a Facebook page. However, without a comprehensive online repository of OGP-related activities, it became extremely challenging for citizens and CSOs—beyond the usual suspects—to monitor, the implementation of the plan, even in a more external capacity.

Level of Public Input

The IRM has adapted the International Association for Public Participation (IAP2) Scale of participation for use in OGP. Table 8 shows the level of public influence on the implementation of the action plan. From left to right, features of participation are cumulative. In the spirit of OGP, most countries should aspire for "collaborate."

Perceptions differ among government and civil society organization (CSO) members of the Shared Management Forum (the Forum) regarding the efficiency and utility of this participatory mechanism as a monitoring body. General meetings tended to gather more representatives of the two governmental bodies formally designated as Forum members (namely the São Paulo Aberta and Integrity Promotion Division [COPI]/Office of the Municipal Comptroller [CGM] teams) and fewer representatives from elected CSO.

Forum CSO representatives reported not only performing expected monitoring and oversight roles, but also assisting in the implementation of many of the activities planned. The latter included attending commitment activities (meetings and trainings), mobilizing speakers, acting as speakers in trainings, and assisting in the logistics of workshops. Some CSO representatives believed the increased need to strategize implementation of some commitments, particularly those with activities spread-out throughout the city, constrained regular government feedback on overall action plan progress. They noted it also compromised CSOs' overall monitoring, evaluation and oversight functions[105]. Such commitments stretched limited government human resources in a large city such as São Paulo. Government representatives, contrariwise, expected CSOs in the Forum to be more consistently engaged in implementation—for instance, attending more events and activities.[106] Both sides reported that commitment working groups' meetings became less frequent during the final months.

As mentioned, civil society engagement during plan implementation was limited to the CSO members of the Forum. However, not all of the Forum's elected CSOs actively participated in closely and continuously monitoring the implementation.[107] The Forum took no concrete action to revert this scenario. It did not open its meetings to other CSOs or open an additional formal election to bring more CSOs to the table.[108] In addition, the lack of an online public repository and website (or section within existing online platforms) exclusively devoted to open government initiatives in the city, including São Paulo's participation in OGP, potentially prevented outsiders from equally assessing progress and commenting on the process. Even if informal, this potential extended network of active citizens and CSOs could have supported Forum CSOs in more implementation-like duties, such as taking part in multiple citywide activities. The government could have transformed its internal online repository into a broader public repository and secured a proper website. These actions could have equally helped in making information public and available to a wider set of citizens and key stakeholders.

Thus, the IRM researcher believes public input during the action plan's implementation reached the level of collaboration. Forum CSOs recognized the uniqueness of this collaboration and valued São Paulo Aberta and COPI/CGM's continuous efforts to establish this horizontal space.[109] Yet, unlike in the plan

elaboration process, the government did not sufficiently mobilize and engage larger sections of the public, both local civil society and citizens at large, in implementation.

The amount of sharing and interaction—and the breadth of frank discussions between CSOs and Forum civil servants—serve as important evidence of the trusted space for those hoping to make the OGP action plan work. A rebalance could be considered for future action plans. That rebalance could include record sharing and public accounting for progress, giving other stakeholders the possibility to interact and engage as well.

Table 8. Level of Public Input

Level of public input		During implementation of action plan
Empower	The government handed decision-making power to members of the public.	
Collaborate	There was iterative dialogue AND the public helped set the agenda.	✔
Involve	The public could give feedback on how commitments were considered.	
Consult	The public could give inputs.	
Inform	The government provided the public with information on the action plan.	
No Consultation	No consultation	

94 Focus group with civil society representatives from the Shared Management Forum (18 May 2017), and focus group with São Paulo Aberta and CGM civil servants (4 May 2017).
95 Interview with Joara Marchezini and Caroline Burle from RETPS (21 November 2017), interview with Renata Galf from Transparência Brasil (14 November 2017), and interview with Ana Dienstmann and Eduardo Barboza (1 December 2017).
96 Between September 2016 and December 2016, during the plan elaboration phase, the Forum hosted another six general meetings.
97 Information provided to the IRM researcher by several Forum members. The IRM researcher could retrieve only a few meeting minutes from the commitments' working groups, mostly from the initial ones. These became scarce as the year progressed.
98 See "Relatório de Implementação (Dezembro - 2017)" in SMRI/São Paulo Aberta, "Plano de Comunicação de Governo Aberto," http://www.prefeitura.sp.gov.br/cidade/secretarias/relacoes_internacionais/noticias/?p=247324.
99 Focus group with civil society representatives from the Shared Management Forum (18 May 2017), and interview with Vanessa Menegueti, civil servant from CGM/COPI (9 November 2017).
100 According to the Innovation and Technology Secretariat, the public hearing to discuss changes in Commitment 5 was, alternatively, held at 7pm on a working day (8/6/2017), as to allow for a broader participation.
101 Two CSO representatives openly justify their absences, attributing them to the impossibility to conciliate meetings at City Hall with their work commitments during work times. Others, including representatives from social movements territorially based in decentered regions of the city, made considerable efforts to come to meetings, even when this involved intense commuting time.

[102] Namely, the Movimento Popular de Saúde (Popular Health Movement), RETPS network (represented most of the time by the transparency organization Artigo 19 Brasil, with the support of W3C, a transparency and open data organization), PIDS (a local development umbrella organization working in the region of Butantã), and Transparência Brasil.

[103] The following did not participate: Liga Solidária, Open Knowledge Brasil, Transparência Hacker, and WRI.

[104] Interview with Haydee Svab (23 November 2017); interview with Joara Marchezini and Caroline Burle (21 November 2017); focus group with civil society representatives from the Shared Management Forum (18 May 2017); and interview with Vanessa Menegueti, civil servant from CGM/COPI (9 November 2017). The IRM researcher was not able to obtain a clear response from two CSOs—WRI and Open Knowledge Brasil—on their reasons for disengaging from the process. The IRM researcher attempted, albeit unsuccessfully, to reach out to them both through collective messages as well as individually tailored ones.

[105] Interview with Renata Galf, representative of the organization Transparência Brasil (14 November 2017).

[106] Interview with Vanessa Menegueti, civil servant from COPI/CGM (9 November 2017), and interview with Ana Dienstmann and Eduardo Barboza (1 December 2017).

[107] This became clear not only from the minutes of Forum meetings, to which the IRM researcher was given access, but also from interviews with Forum members and from the IRM researcher's own observation of events and activities conducted under the OGP action plan.

[108] Interview with Joara Marchezini and Caroline Burle from RETPS (21 November 2017), and interview with Renata Galf from Transparência Brasil (14 November 2017).

[109] Interview with José Adão, civil society representative from PIDS (15 November 2017).

Commitments

1. Participation: Increase the power of intervention of the Municipal Participative Councils

Commitment text:

Increase the power of intervention of the Municipal Participative Councils in each Subprefecture (city district)[110], creating deliberative open sessions to receive proposals and demands from the citizens.

Milestones

1. The Municipal Participative Councils, supported by their respective Subprefectures, shall make available in print and electronic means, duly in advance, the agenda, schedule and minute[s] of the meetings.

2. The 32 city district mayors will be responsible for holding intersectoral open meetings with other local councils every 6 months, enabling a greater mobilization within each of the 32 districts, and also involving other local government actors.

3. Subprefectures shall produce semestral [biannual] reports, making it [them] available electronically and in print, to inform the respective Councils and citizens in the district of the status of projects, works and actions that will be developed, to guarantee proper oversight, evaluation and monitoring.

Commitment overview

Start date in action plan:	January 2017
Intended completion date:	December 2017
Responsible Office:	Municipal Secretariat for International Relations, in partnership with the Office of the Municipal Comptroller, the Municipal Secretariat for Regional Prefectures and the Municipal Special Secretariat for Governmental Relations
Lead CSO partners:	Participative and Thematic Municipal Councils

Commitment Overview	Specificity				OGP Value Relevance				Potential Impact				Completion				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Tech. and Innov. for Transparency and Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Complete	Worsens	Did not change	Marginal	Major	Outstanding
Overall			✔		✔	✔					✔			✔					✔		
1.1 Publish CPMs' meeting documents				✔	✔						✔			✔							
1.2 Hold intersectorial meetings at districts			✔			✔					✔			✔							
1.3 Regional prefectures to produce and publish biannual reports				✔	✔						✔				✔						

Commitment Aim

Overall Objective & Relevance

This commitment seeks to address the low participation rates among São Paulo citizens in the existing local participatory structures. This commitment particularly focuses on the Municipal Participative

Councils (CPMs) and thematic municipal councils functioning in each of the city's 32 regions. Although São Paulo has a long tradition of participatory structures dating back to the 1980s, the government recently established CPMs in 2013.[111] They operate at the local level in all 32 Regional Prefectures (Prefeituras Regionais) to perform consultative monitoring and oversight roles over a series of local policies and service delivery actions.

To address participation challenges, this commitment aims to enhance the CPMs' work. It calls for the creation and improvement of information, communication, and accountability channels between citizens and the councils. It also aims to empower these local participatory structures in relation to Regional Prefectures, through deliberative open sessions.

The rationale for this commitment relies on a two-way dynamic. First, the commitment will establish open local intercouncil meetings and use Regional Prefectures' websites to publish updates from the councils and the Regional Prefectures' mayors. By doing so, this commitment hopes to make those participatory bodies more open and useful to citizens. Second, the commitment will reinforce these councils' monitoring and oversight role through the open meetings, which create spaces for local mayors to inform the councilors of local government actions. Thus, this commitment will empower the local councils in relation to Regional Prefectures.

The commitment's overall objective aims to strengthen, revitalize, and empower formal, existing participatory structures at the local level. Thus, this commitment is relevant to the value of civic participation. It aims to further improve existing spaces for citizens to take part in the local decision-making process. Additionally, through its stand-alone yet complementary milestones, this commitment is also relevant to access to information. Milestones 1 and 3 call for the publication (both in print and online forms) of new, local government-held information (e.g., status of projects, works, actions). They also require information on participative councils, such as meeting agendas, calendars, and minutes.

The IRM researcher considers the commitment not clearly relevant to the value of public accountability. Milestones 2 and 3 require regional mayors to twice a year host the open deliberative intercouncil meetings and provide councilors and local community with reports on their actions. However, City Hall representatives who led the development of the action plan and those currently working to implement the plan have informed the IRM researcher that the commitment does not intend to transform councils' consultative roles into deliberative ones.[112] Such reform would require legislative changes for which the team currently working to implement the action plan does not believe it would succeed in mobilizing support.[113] Consequently, the commitment requires regional mayors to provide information or data without having to justify their actions, act upon criticisms or requirements, or accept responsibility for failure to perform with respect to laws or commitments.[114]

Specificity and Potential Impact

The researcher considers this commitment to have medium specificity and a moderate potential impact.

The first and third milestones are clear and achievable activities to be fulfilled through a partnership between local councilors from Municipal Participative Councils (CPMs) (namely through their coordinators) and Regional Prefectures. These reforms could have a major impact on access to information practices, considering that the CPMs must systematically publish information for citizen use. This will impact the behavior of citizens' councils and local authorities.

The second milestone, which tackles the overfragmentation of existing local civic participatory spaces and their low impact, is more complex and less specific. When referring to the intercouncil meetings,

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the commitment does not define the "other local councils." (That is, will all local thematic councils operating in each of the 32 submunicipalities—such as public security, health, food security and nutrition, and housing—be invited to take part in the intersectoral open meetings hosted by the Regional Prefecture every six months? What are the means and incentives to invite and assure thematic councilors' participation?) Additionally, it does not provide benchmarks for assessing elected councilors' participation rates and deliberation outcomes from the deliberative sessions intersectorial meetings. Finally, it lacks clarity on the concrete outputs of those meetings. It does not outline through what specific channels and procedures those joint meetings will inform the broader decision-making process. This should clarified for the Regional Prefecture level, the thematic or sectorial level (for instance, in terms of health issues that could be raised), and overall City Hall planning.

Therefore, the IRM researcher considers this commitment to have an overall moderate potential impact. It aims to reform and update information channels, and increase engagement and expand citizen participation at the submunicipal and local levels. It serves as a first and important step to revitalize the existing participatory structures and to empower citizens at the very local level, from a territorial-based approach, in all 32 Regional Prefectures. This commitment could be greater in scope if it were supplemented with other actions taken at the submunicipal and City Hall levels to make regional mayors more responsive to local councils. It would also have greater coverage if it provided a roadmap to incorporate these new and enhanced practices beyond the one-year action plan. The commitment could require specific, hands-on training for local civil servants to carry on with the planned tasks, such as those listed in the first and third milestones.[115] On a parallel note, it is important to underscore São Paulo Aberta's recognition of the importance of capacity building, as well as its belief that some of the required training needs are being addressed through the activities for local civil servants. These activities include those from Regional Prefectures under Commitments 2 and 4, namely the Open Government Agents Program and the Open INFO Network.

Completion

Limited

The commitment milestones showed different levels of completion. As a whole, the IRM researcher believes that São Paulo has made limited progress in the implementation of this commitment. This states can be attributed to significant execution, coordination, and political challenges in this first implementation year.

Milestone 1: Publish the Municipal Participative Council's meeting documents

Regarding the first milestone, CPMs' meetings agendas, schedules, and minutes were not consistently made available in an online format on the websites[116] of all 32 Regional Prefectures.[117] Though all Regional Prefectures have created and/or reactivated a specific "social participation" section on their websites, the type of information available in those spaces was, nonetheless, uneven across the localities. Based on an individualized revision of the Regional Prefectures' websites, the IRM researcher has found that most of them had very few or no available minutes from 2016 or 2017 meetings. Even the most updated websites were three to four months late (for example, May or July 2017 for the Regional Prefectures of Jabaquara and Itaquera, respectively).[118] In general, information on past meetings and deliberations was outdated. Not all websites had clear timelines or invitations for the Municipal Participative Council member elections, scheduled to take place in December 2017. Similar information was not posted for the biannual intersectorial meetings, organized under the OGP umbrella in 2017.

Civil society representatives also reported no meaningful improvements in the availability and accessibility of those documents in print formats.[119]

Milestone 2: Hold inter-sectorial meetings in the 32 city districts

For the second milestone, the government hosted the first round of inter-sectorial meetings (named "Open Dialogues with the CPMs [Municipal Participative Councils]") between July and August 2017 in all but one Regional Prefecture (the prefecture of Penha).[120] The Shared Management Forum (the Forum) carefully designed those dialogues to provide a space for councilors in each locality to reflect on the main challenges to improving participation in each of the 32 localities. The Forum designed these as dialogues rather than deliberative meetings, as stated in the commitment language. São Paulo Aberta and Integrity Promotion Division (COPI) representatives facilitated and moderated the meetings. Forum civil society organization (CSO) members helped informally—namely, Projetos Integrados de Desenvolvimento Sustentável (PIDS, a local development organization working in the Butantã region) and the Movimento Popular de Saúde (Popular Health Movement). All meetings followed the same methodology. First, there was an introduction of São Paulo Aberta, OGP, and the OGP action plan. Second, regional mayors reported on their first six months of work. Third, participants were divided into groups, and discussed both challenges and solutions to strengthen CPMs and participation in the territory. Fourth, each group reported back to the whole room. Approximately 900 people attended the first round of meetings and drafted 418 proposals to strengthen CPMs' work.[121] City Hall has systematized the main issues raised in each meeting in the format of a report. This was shared with the CPMs and the Regional Prefectures in December 2017 (three months later than the planned release date).[122] The report contained individual feedback for each CPM. It also provided an analysis of the main diagnosis across regions and proposed solutions for the regions.[123] The report cited the following main challenges across the councils: (i) greater interaction between the Regional Prefecture and CPMs, (ii) communication and dissemination of CPMs' activities, and (iii) the workings of the CPMs.[124]

Perceptions from those who took part in the first round of meetings varied from skepticism to overall approval. Councilors and local citizens praised the meetings for offering a chance to exchange with other councilors, discuss CPMs' functioning, and reiterate long-standing demands. José Adão, from the Black Movement and PIDS, believes the meetings accomplished their goals and were a good opportunity for São Paulo Aberta to introduce its work and the OGP locally, as well as for councilors to listen to each other.[125] Representatives from São Paulo Aberta and COPI also valued this hands-on experience on local participatory structures.[126] More skeptical councilors, however, expressed concerns about the sustainability of some of the reforms advanced by this commitment. They pointed out that publishing formal CPMs' documents exists as a largely overseen requirement in CPMs' regulatory framework.[127] Allan Greicon, an elected councilor from the region of Butantã, also cautioned about a potential demobilizing—rather than empowering—effect over councilors. He noted this could happen if the inter-sectorial meetings reveal themselves to be "another well-intentioned initiative with no meaningful continuity."[128] He further justified this skepticism by mentioning previous diagnosis efforts—such as surveys with elected councilors during the past administration—without follow-up.[129]

After the first round of these inter-sectorial meetings, an important political event took place. This affected the timeline and completion of the second round of meetings. The government approved the Executive Decree (Portaria) No. 57.829/2017, changing election rules for the December 2017 CPMs' elections and reducing the representation ratio in each Regional Prefecture.[130] According to Celso Henriques, the coordinator for the participative councils in City Hall, the government introduced the decree to improve the CPMs' workings. Henriques noted that the decree served to respond to the

increasingly low turnout in meeting participation and to reduce what he calls "partisan politicization among councilors."[131] A series of voices in civil society agree on the need to empower the CPMs in relation to citizens and City Hall.[132] However, they disagree on the best way to achieve this goal—in particular the proposed solution of reducing the number of elected councilors. According to a representative of the Movimento Nossa São Paulo, a major umbrella CSO, these councils are still new and need support from City Hall to become active and relevant. Accordingly, increasing their deliberative powers, not curtailing their representativeness, would make CPMs relevant.[133] One elected councilor from the Butantã region supports this view. That council notes that the decree's measures go against what councilors themselves have been advocating for.[134] Importantly, this dialogue component is precisely the focus of the initiatives set forth in Commitment 1. Following the decree, some opposition municipal lawmakers[135] have proposed legislation that would nullify the effects of the administrative decree, but this bill has yet to be voted on.[136] CSOs elected to the Forum (see the Development Process and Monitoring of the Action Plan section) equally expressed concerns with the proposed measures. They argued that the measures go against the very spirit of one of the commitments of the OGP action plan.[137] Other civil society representatives have further pointed to the demobilizing effect such measures might have on the current councilors and on the next round of elected councilors to start in 2018.[138]

The government scheduled the second round of inter-sectorial meetings to happen in October, but due to delays, the government hosted them between 8 November and 21 December 2017.[139] Delays were attributed both to human resource limitations in the São Paulo Aberta team and to the lengthy negotiations that took place between the São Paulo Aberta/Office of the Municipal Comptroller teams and the Regional Prefectures. According to Eduardo Barboza from São Paulo Aberta, the Forum agreed that the second round of meetings would discuss capacity-building and training activities to help next year's newly elected councilors better perform their roles.[140] The focus came from the suggestions of councilors themselves and built on the diagnosis done in the first round. The Forum faced challenges getting the Secretariat for Governmental Relations more engaged in the implementation during the second round. Mostly, this can be attributed to the tense relations between this government department and municipal participative councilors after the release of Executive Decree 57.829/2017. Barboza reported, in early December, that councilors remained mobilized to continue the Open Dialogues, but turnout was lower than during the first cycle. For those working at São Paulo Aberta, the low turnout could be explained both by the inconvenient timing—close to the December holidays—and the disengagement of some councilors after the issuing of the decree. Due to the delayed calendar, general and individualized feedback reports from the second round of meetings are expected to be shared with CPMs in 2018.

Milestone 3: Regional Prefectures to produce and publish biannual reports

Regarding the third milestone, the biannual reports from the Regional Prefectures on their actions conducted locally, almost all regional mayors presented their first six-month report to councilors during the inter-sectorial meetings in July and August. Eduardo Barboza, from the São Paulo Aberta team, reported that by December all Regional Prefectures had made their first biannual reports available online (concerning activities carried out between January and July 2017).[141] According to City Hall official monitoring, by the end of the implementation period, all the 32 Regional Prefectures had published online their first and second six-month reports. (The second reports concerned activities carried out from August to December 2017.) But the majority of the prefectures (86 percent) did not make the reports available in print format.[142] A closer look also reveals accessibility and standardization challenges.

There is no single template for this disclosure, and often information is not self-explanatory to citizens.[143] Key informants have also suggested that print versions of all the documents were not made available for citizens in the Regional Prefectures.[144]

Early results: did it open government?

Access to information: Marginal
Civic participation: Marginal

This commitment aimed to strengthen Municipal Participative Councils (CPMs), perceived as highly demobilized and disempowered, through a series of measures. It would improve CPMs' own transparency and communication with local communities where they serve as participatory bodies. It called for hosting biannual open inter-sectorial meetings among CPMs and other thematic local councils. It would also create opportunities for local authorities at the submunicipal level (Regional Prefectures) to report on their actions to elected councilors and to communities. The political and institutional context related to the CPMs significantly changed during the implementation phase. The CPMs went through an administrative reform that sparked a heated debate among councilors. In the midst of this debate, elections were held. The tense environment resulted in further disengagement by elected councilors.

Based on the information gathered, and on the initially desired outcomes, the IRM researcher believes there is marginal evidence of this commitment having opened government.

Regarding access to information, the commitment called for council documents to be made public in print and online forms in all 32 Regional Prefectures. However, the results were limited across the 32 Regional Prefectures. Results were also limited in terms of accessibility in a citizen-friendly format[145] either in print form or online (through the Social Participation section of each Regional Prefecture's website).

There were some positive signs that this commitment generated spaces for greater participation—in the very short term[146]—through the first round of inter-sectorial meetings. These signs became more apparent in the second round, albeit to a lesser extent. (The decreased prominence can be attributed to the increased difficulties in scheduling and hosting the meetings in December, and the unease generated by Decree 57.829/2017. However, commitment language called for "deliberative meetings," and the inter-sectorial meetings hosted in 2017 did not have a deliberative nature. During the planning phase, civil servants in charge of implementation were open about their interpretation of the commitment language. They argue that political limitations (i.e., the need to reform legislation on CPMs to change their consultative status to deliberative) prevented the installation of deliberative meetings. Instead, they chose to host consultative meetings, named "Open Dialogues."[147] This approach brought obvious limitations to the aspired results.

Retrospectively, civil servants who led the implementation consider the size of their team and the insufficient cooperation from other government secretariats who engage Regional Prefectures and councils key reasons for limited completion and delays in implementation. Shared Management Forum (the Forum) members also agree that the reforms advanced by Decree 57.829/2017 strongly distracted from the activities being carried out under the commitment and hindered the commitment goals. Forum civil society organizations (CSOs) emphasized that elected CPMs' councilors' disapproval of the decree and the subsequent tensions debilitated fragile social participation dynamics at the local level. Since the

announcement of the municipal decree in August 2017, there were claims of several councilors quitting their positions ahead of the upcoming CPMs' elections and several CPMs becoming virtually paralyzed or dysfunctional.[148]

The IRM researcher further believes that structural communication and coordination challenges during implementation also led to limited results. Those were observed between government agencies such as São Paulo Aberta, the Secretary of Government, Secretary for Regional Prefectures, and Regional Prefectures. City Hall and the councils also faced these challenges. During the first round of inter-sectorial meetings, councilors were not always aware of the meeting and/or its agenda. Regional Prefectures did not meaningfully collaborate (for instance, in scheduling the open inter-sectorial meeting or disseminating invitations). Some regional mayors did not attend the meetings.[149] Celso Henriques, coordinator for Participatory Councils at the Special Secretariat for Governmental Relations, confirms having personally hosted—together with the São Paulo Aberta team—at least two coordination and alignment meetings with Regional Prefectures and with council coordinators ahead of the CPMs' open meetings[150].

Also, in addition to technical communication challenges, conflicting agendas within City Hall also played a detrimental role in implementation. Whereby decisions from the Secretary of Governmental Relations on reforming the current composition of CPMs (the very object of this commitment) were taken at a higher level, with little consultation to the technical civil servants' body in São Paulo Aberta, but also to councilors themselves. Forum CSO members have expressed concerns about the proposed decree measures and their negative impact in terms of disempowering councils and councilors.[151] Those tensions make clear the lack of consensus on citizen participation in the city and the competing visions[152] not only between government and councilors, but also within government.

Another hypothesis for the marginal results relates to the meetings themselves. The meetings boasted overall recognized support for a wide diagnosis of CPMs' workings to move forward with the reformist agendas. However, the meeting were better at introducing OGP and the overall 2017 action plan than they were at clearly locating the OGP commitment in context. In other words, the meetings did not make clear to councilors and Regional Prefectures' civil servants that this OGP commitment would foster a new pattern of periodical inter-sectorial dialogue at the district level. Without that description, participants generally felt that meetings were stand-alone events in partnership with São Paulo Aberta. Participants raised this sentiment both during the meetings and in follow-up accounts by councilors. This challenge may be minimized in the future, as inter-sectorial meetings will be routinized and São Paulo Aberta will further clarify its own niche and role in relation to CPMs.

Stakeholders' are broadly skeptical about this commitment's sustainability. Some believe it can continuously produce minor open government results in the coming years, since these activities are now part of the Mayor's Goals. Others seem more disenchanted, pointing to the current disempowerment of CPMs and councilors. This disenchantment showed in the low numbers of candidates for the upcoming December elections to the 2018–2020 biannual.[153] Yet, even in light of the current limited outcomes, the IRM researcher acknowledges a potential to achieve more results in the coming years with the proposed measures becoming routinized. More results can materialize provided, on the one hand, that councilors are still engaged with CPMs and committed to provide Regional Prefectures with their minutes. Also, civil servants in Regional Prefectures would have to be committed to make their minutes widely public. Similarly, regional mayors would have to be committed to meaningful dialogue with the CPMs through reporting on their activities and providing CPMs with the necessary political support to function. The inter-sectorial meetings hosted under this commitment were generally well received by

councilors themselves.[154] They also stood as indicators of CPMs' privileged role of territorially connecting state and society. This status is reflected in the diverse presence of municipal and state governmental and nongovernmental actors who show up in the inter-sectorial meetings, to exchange with councilors and invite them to other non-open government related public hearings, local conferences, and social and educational events. The two rounds of inter-sectorial meetings also made clear the need for these relatively new participatory institutions, the CPMs, to be materially and politically empowered. Doing so would unlock their potential to bridge local demands and serve as channels for the local population to access the state and state services. São Paulo Aberta or the Forum could explore and expand this role.

Recommendations

To move this commitment's intended reforms forward, the following recommendations should be considered by the São Paulo government:

1. Establish a task force comprised of civil servants from São Paulo Aberta, the Integrity Promotion Division (COPI)/Office of the Municipal Comptroller (CGM), Regional Prefectures Secretariat, and the Secretariat for Governmental Relations. The task force should have clear roles and responsibilities to ensure the sustainability of the three milestones in Commitment 1. The outline of the task force's work should also ensure implementation in the next three years, per the Mayor's Goals (Goal 49), in each of the 32 Regional Prefectures.
2. In light of Goal 49 of the 2017–2020 City Mayor's Goals, the government should host an inter-secretarial meeting during which São Paulo Aberta and CGM/COPI representatives present information relevant to the goal. These bodies could share with the Regional Prefectures Secretariat and Secretariat for Governmental Relations the main findings of the inter-sectorial meetings diagnosis. They could also reflect on how to respond to the main challenges raised by Municipal Participative Council (CPM) councilors and to the concrete suggestions made. The subsequent inter-sectorial meetings, from 2018 on, could be devoted to the most commonly raised issues. These meetings would continue building hands-on knowledge on strengthening CPMs' role as a participatory mechanism. More frequent public hearings and consultations could be equally valuable. They could lead to more inclusive decisions on how to reform participatory institutions and their procedures, either through new decree amendments or through internal administrative acts (*portarias*).
3. Regional Prefectures and CPMs should invest in better communication through local biannual inter-sectorial meetings with local communities. These meetings could be held in other relevant local facilities, such as schools, health units, and cultural and religious centers. Facilitating meetings in these locations could unlock the full potential of those spaces for local communities to hear and engage with the reports from local authorities.
4. Ensure that future Open Dialogues with regional mayors provide opportunities for councilors and local community members to discuss and address Regional Prefectures' performance limitations. For example, dialogues could explore methodologies, such as social audits or multi-stakeholder methods of assessing local policy implementation.

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[110] **Editorial Note:** For administrative purposes, the São Paulo municipality is divided into 32 Regional Prefectures (*Prefeituras Regionais),* sometimes referred to in English as submunicipalities or boroughs. Each of them is comprised of districts (*distritos),* also referred to as wards. There are 96 districts in São Paulo. Until the end of 2016, when the OGP action plan was designed

and approved, Regional Prefectures were officially called Subprefectures (*Subprefeituras*), and that is the language found in São Paulo's official action plan. In its English version, São Paulo's action plan equates Subprefectures to city districts. The IRM report respects the official translation provided by City Hall, which used both Subprefectures and city districts to refer to the existing 32 Regional Prefectures.

[111] Municipal Executive Decree No. 54.156, from 1 August 2013, available at http://www3.prefeitura.sp.gov.br/cadlem/secretarias/negocios_juridicos/cadlem/integra.asp?alt=02082013D%20541560000. For a comprehensive account on local participatory dynamics in São Paulo, see AVRITZER, Leonardo (Org), *A Participação em São Paulo* (São Paulo: Unesp, 2004).

[112] Focus group with São Paulo Aberta and CGM civil servants (4 May 2017).

[113] Written communication between the IRM researcher and Ana Dienstmann, current São Paulo's OGP focal point (18 October 2017).

[114] See IRM Procedures Manual, https://opengovpartnership.org/documents/irm-procedures-manual.

[115] Interview with Gustavo Vidigal (8 May 2017).

[116] Importantly, CPM minutes are already being made public in the online version of the city's *Official Gazette*, a legal requirement predating the OGP commitment.

[117] Interview with Ana Dienstmann and Eduardo Barboza, civil servants at the SMRI/São Paulo Aberta Initiative (1 December 2017), and interview with Haydee Svab from Transparência Hacker (23 November 2017).

[118] For instance, in November 2017, the last CPMs minutes in the Regional Prefecture of Pinheiros were from September 2015 (see http://www.prefeitura.sp.gov.br/cidade/secretarias/regionais/pinheiros/participacao_social/conselhos_e_orgaos_colegiados/index.php?p=53521, accessed in 23 November 2017). In the Regional Prefecture of Sapopemba, the section devoted to councils was completely empty (see http://www.prefeitura.sp.gov.br/cidade/secretarias/regionais/sapopemba/participacao_social/conselhos_e_orgaos_colegiados/, accessed in 23 November 2017). See the two corresponding print screens in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.

[119] Interview with Allan Greicon, councilor in the Butantã regional (8 August 2017), interview with Haydee Svab from Transparência Hacker (23 November 2017), and interview with José Adão (15 November 2017).

[120] Civil servants from São Paulo Aberta have justified this exceptional case in Penha as a consequence of challenges in approaching local government (the Regional Prefecture) and in agreeing on a common time and day. The IRM researcher attended five of those meetings as a participant observer.

[121] A civil servant revealed figures to the IRM researcher during an interview. Interview with Eduardo Barboza, civil servant at São Paulo Aberta (7 August 2017).

[122] Interview with Eduardo Barboza, civil servant at São Paulo Aberta (7 August 2017).

[123] Prefeitura de São Paulo, Secretaria de Relações Internacionais, "Relatório Diálogo Aberto CPM - 2017/1," 15 December 2017, http://www.prefeitura.sp.gov.br/cidade/secretarias/relacoes_internacionais/noticias/?p=246946. For the full document, see "#1_General Report_Open Meetings_1st semester" in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.

[124] Information retrieved from the São Paulo Aberta report, to which the IRM researcher was given access.

[125] Interview José Adão from PIDS (15 November 2017).

[126] Interview with Vanessa Menegueti from CGM/COPI (9 November 2017).

[127] Interview with Haydee Svab, from *Transparência Hacker* (November 23rd, 2017).

[128] Interview with Allan Greicon, councilor in the Butantã regional (8 August 2017).

[129] Interview with Allan Greicon, councilor in the Butantã regional (8 August 2017). Similar views were reported in the minutes of follow-up ordinary council meetings after the São Paulo Aberta extra-ordinary meeting, for instance in Santo Amaro, Butantã, or São Mateus. For Santo Amaro and São Mateus, see the minutes of those CPM meetings in the *Official Gazette:* http://www.docidadesp.imprenSãoficial.com.br/NavegaEdicao.aspx?ClipID=B7PIN3FLH8EQJe7LC39REQUGHD3&PalavraChave=%22governo%20aberto%22. For Butantã, see the minutes of the 18th ordinary meeting (20 July 2017): http://www.docidadesp.imprenSãoficial.com.br/NavegaEdicao.aspx?ClipID=5D2T4U9ORR3HUeA2BAQ1UIO6LAC&PalavraChave=CIGA.

[130] See "Minutes of the XII Forum Meeting (13/07/2017)," to which the IRM researcher had access.

[131] Interview with Celso Henriques, CPMs coordinator at the Secretariat for Governmental Relations (17 August 2017).

[132] This awareness propelled councilors to suggest the inclusion of one commitment to strengthen councils in the OGP action plan in 2016. This idea advanced and became Commitment 1, which focused on improving councils' transparency, as well as on empowering councils in relation to Regional Prefectures.

[133] See "Doria Reduces Popular Participation in the Management of SP Regional Municipalities," Globo.com, http://g1.globo.com/São-paulo/noticia/doria-reduz-participacao-popular-na-gestao-das-prefeituras-regionais-de-sp.ghtml. Similar

concerns from councilors from other regions can be seen at the online forum of the CONSOCIAL, a nationwide initiative created in 2011 to improve citizen participation and oversight over public policies, available at http://consocial.com.br/20170817cmp.asp.

[134] Interview with Allan Greicon, elected councilor, CPM Butantã (8 August 2017). Also, see an autonomous survey conducted in 2017 with 30 councilors, organized by councilors from Butantã and available at https://infogram.com/fortalecendo-a-participacao-1gew2vkgv588mnj. According to survey results, the most frequent demands from councilors are (i) greater responsiveness from City Hall, (ii) trainings for the councilors, and (iii) greater dialogue between CPMs and Regional Prefectures. Also, see *Manifesto pelo Fortalecimento da Democracia Participativa em São Paulo*, a statement issued by the Butantã Council 22 August, available at:
https://www.facebook.com/conselhoparticipativobutanta20162018/photos/a.600843953422251.1073741830.550951848411462/846568855516425/?type=3&hc_location=ufi.

[135] See the public note from one of the lawmakers, Eduardo Suplicy, on the matter at
http://eduardosuplicy.com.br/2017/08/23/democracia-perde-com-conselho-participativo-menor/.

[136] The bill introduced by Eduardo Suplicy (PT) can be seen at https://www.jusbrasil.com.br/diarios/165547941/dom-sp-normal-25-10-2017-pg-275.

[137] Minutes of the XIII Forum Meeting, 28 August 2017, to which the IRM researcher had access.

[138] Interview with Vanessa Menegueti (9 November 2017), interview with José Adão (15 November 2017), interview with Haydee Svab (23 November 2017), and personal communication with Marileide Luna (November 2017).

[139] See the calendar for the second round of CPM inter-sectorial meetings, released by São Paulo Aberta at
https://docs.google.com/spreadsheets/d/1IzfphXUROqD8rr37OTVVdFqavXUISCXe4_J5SJWNEkE/edit#gid=1100432772.

[140] Interview with Eduardo Barboza, civil servant at São Paulo Aberta (1 December 2017).

[141] Interview with Ana Dienstmann and Eduardo Barboza, civil servants at the SMRI/São Paulo Aberta Initiative (1 December 2017). The IRM researcher was also given access to an internal working document where São Paulo Aberta had tracked all Regional Prefectures' websites and copied all the directions for each report.

[142] In December 2017, the IRM researcher was given access to a monitoring document, where the São Paulo Aberta team recorded the implementation status for each of the 32 Regional Prefectures. The researcher also conducted a randomized analysis to confirm or refute this evidence. The researcher also consulted the draft version of the comprehensive *Annual Report of São Paulo Aberta Initiative* (last accessed by the IRM researcher in March 2018).

[143] As an illustration, in the region of Santo Amaro, this was done under a special section named Administration Report in the Social Participation section of its websites, with a clear indication of the time frame (i.e., first semester of 2017). In the case of Santana Tucuruvi, for instance, there is a link to a PDF file under the title of "Biannual Report," but there is no clear indication of the corresponding period.

[144] According to current councilors and others in civil society closely following CPMs' workings, changes in the availability of these documents are yet to take place. Interview with José Adão (15 November 2017), and personal communication with Marileide Luna (November 2017 and 23 November 2017).

[145] Interview with Haydee Svab (23 November 2017).

[146] Changes in participation in the long run, due to the series of revitalized practices this commitment aims to bring about, are not the subject of this present report.

[147] Focus group with São Paulo Aberta and CGM civil servants (4 May 2017); and interview with Eduardo Barboza, civil servant at São Paulo Aberta (7 August 2017).

[148] Interview with Haydee Svab (23 November 2017); interview José Adão from PIDS (15 November 2017); interview with Allan Greicon, councilor in the Butantã regional (8 August 2017); personal communication with Marileide Luna (November 2017); and interview with Vanessa Menegueti from CGM/COPI (9 November 2017).

[149] Interview with Celso Henriques, civil servant at the Secretariat for Governmental Relations (17 August 2017). The São Paulo Aberta team has also reported having sent follow-up communications to all regional mayors recalling their role in the meetings.

[150] Celso Henriques reiterated this point publicly during an interactive dialogue with CPM councilors in Itaquera (29 June 2017), attended by the IRM researcher.

[151] Minutes from the 13th meeting (held in August 2017) include a formal repudiation from the Forum CSO members, in which they further emphasize the divergences between what was proposed in the decree and what was articulated in Commitment 1.

[152] Interview with José Adão, civil society representative from PIDS (15 November 2017).

[153] Interview with José Adão from PIDS (15 November 2017), and interview with Vanessa Menegueti from CGM/COPI (9 November 2017).

[154] Interview with José Adão from PIDS (15 November 2017), and interview with Ana Dienstmann and Eduardo Barboza, civil servants at the SMRI/São Paulo Aberta Initiative (1 December 2017).

2. Training: Expand and institutionalize the "Open Government Agents" Training Program

Commitment text:

Expand the Training Program "Open Government Agents", becoming a permanent education and citizenship program, ensuring territorial mobilization and ramification in order to reach the largest number people in São Paulo.

Milestones

1. Map and identify the level of territorial participation in the program and, in partnership with other secretariats, entities, social movements, universities and actors involved in the pilot project, to reflect and elaborate a restructuring and expansion plan to spread the workshops and perpetuate the program.

2. Launch a public notice of the Open Government Agents Program with more vacancies to select innovative projects which reflect the city's diversity and develop a user-friendly language in order to democratise knowledge on open government.

3. Hold activities of Open Government Agents Program in each of the 32 Municipal Subprefectures (city districts) in partnership with public municipal venues, in accordance with the mapping and planning of the first milestone.

Commitment overview

Status of Completion	Substantial
Start Date	December 2016
Intended Completion Date	November 2017
Responsible Office	São Paulo Aberta and Municipal Secretariat for International Relations, in partnership with the Office of the Municipal Comptroller
Did It Open Government?	Marginal

Is it a STAR commitment?	No
Starred commitments are considered exemplary OGP commitments. To receive a star, a commitment must meet several criteria: - It must be specific enough that a judgment can be made about its potential impact. Starred commitments will have "medium" or "high" specificity. - The commitment's language should make clear its relevance to opening government. Specifically, it must relate to at least one of the OGP values of Access to Information, Civic Participation, or Public Accountability. - The commitment would have a "transformative" potential impact if completely implemented. - Finally, the commitment must see significant progress during the action plan implementation period, receiving an assessment of "substantial" or "complete" implementation.	

Commitment Overview	Specificity				OGP Value Relevance				Potential Impact				Completion				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Tech. and Innov. for Transparency and Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Complete	Worsens	Did not change	Marginal	Major	Outstanding
Overall				✔		✔					✔				✔				✔		
2.1 Map participation in previous edition				✔	Unclear						✔					✔					
2.2 Launch public notice for 2017 edition			✔		Unclear						✔					✔					
2.3 Hold trainings and workshops			✔			✔					✔			✔							

Commitment Aim

Overall Objective & Relevance

This is an awareness-raising and capacity-building commitment for São Paulo citizens, local councilors (elected citizens taking part in local participatory councils), and civil servants. It focuses on open government concepts, tools, and initiatives. This commitment seeks to fill an awareness and knowledge

gap on open government. It also aims to address the lack of citizen empowerment to take part in City Hall's open government initiatives, use open government tools and concepts, and disseminate open government culture.

Responding to these challenges, the commitment works to promote greater inclusivity and expand São Paulo Aberta's Open Government Agents Program, first launched in 2015. In 2017, Connected Smart Cities chose this program as one of the country's four best initiatives on public sector social innovations.[155] Through this program, citizen-trainers (agents) host workshops to train civil servants, city councilors, and regular citizens (focusing on vulnerable youth) to use tools and mechanisms for participating in open government. These tools include how to file access to information requests, how to take part in participatory councils, and how to monitor local health policies. The citizen-trainers also instruct on how to monitor the public budget and how to create georeferenced maps for public services, among other tasks.[156]

Consequently, this commitment is first and foremost relevant to the value of civic participation. It broadens the operating environment enabling civic participation. Through capacity building and training on open government values, themes, and tools, the program helps citizens champion local actions and policies to promote access to information, integrity, participation, and technology innovation.

Specificity and Potential Impact

This commitment's specificity is high, since it provides clear and verifiable activities and a coherent set of cumulative measurable deliverables. If fully implemented, this commitment could have a moderate impact. It constitutes a major step forward in consolidating this citizen-led open government training program, further incorporating lessons learned for greater inclusivity than the previous 2015–2016 edition. This is particularly important in the context of budgetary restrictions of today's São Paulo. Yet this same context limits the Program's capacity to expand and affects the overall potential impact.

Completion
Substantial

The level of completion for Commitment 2 was substantial. The implementation process faced a series of logistical challenges. Citizens' participation in trainings and workshops (*oficinas*) fell short of stakeholders' initial expectations. They had hoped to bring in a larger number of final beneficiaries and reach more people geographically and across social contexts.

The government completed the first milestone, the analysis and mapping of previous (2015–2016) trainings' turnouts, in the early months of 2017.[157] That analysis informed the initial planning of the 2017 edition. The government hosted a virtual consultation and a public hearing in April 2017. Participants collectively designed the call for proposals (*edital*) for citizen-trainers (referred to in the context of the Open Government Agents Program as open government agents).[158] The 2017 call established a comparatively shorter implementation time frame for trainings. The overall program would last one year rather than two. Each agent had three months, rather than six, to host its trainings. The government also reformed the program design to include a higher number of scholarships (from 48 to 56), gender parity as a criterion for selecting agents, and adoption of a geographic outreach performance indicator for the overall program. That indicator involved the need to host trainings in all 32 Regional Prefectures and a social targeting criterion (based on the city's Vulnerability Index) for selecting agents and

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proposals.[159] In 2017, the government also strengthened agents' duties and obligations.[160] One Shared Management Forum (the Forum) civil society organization (CSO) member who had monitored the program since the first edition had positive feedback. The member reported satisfaction with the way critical reflection and learnings on the program's representatives and inclusiveness were considered during the second edition planning phase.[161]

The government opened the call for proposals[162] (object of the second milestone) on 19 April 2017. The government extended the initial one-month deadline until 29 May 2017 to increase the turnout. In total, 167 citizens applied[163] to become citizen-trainers, or open government agents, and host open and public workshops on four dimensions of open government. Those dimensions included transparency and open data, participative management and collaborative mapping, innovation and open and collaborative technology, and digital culture and communication. An inter-secretarial selection committee[164] chose 56 agents to host trainings for three months. The trainers worked 10 hours per month and had a monthly scholarship of R $1,000.[165] For the 2017 edition, the Office of the Municipal Comptroller (CGM) paid for and managed all the scholarships.[166] In the previous edition, the Culture Secretariat had executed this role. Agents received a series of trainings led by Forum members. The trainings included orientation to the program and three thematic trainings on open government issues, such as citizen participation and technology. The government successfully launched the program in June 2017. However, the initially planned expansion was significantly constrained by the one-year implementation time frame and the financial constraints in the City Hall budget for 2017.

Regarding the third milestone, the government structured the program in two rounds. Twenty-eight agents hosted their workshops from August to October, and the other half worked from October to December. São Paulo Aberta and the Integrity Promotion Division (COPI) initially planned to reach out to key government institutions to partner on the program.[167] (Such planning considered how to mobilize targeted participants in several localities—particularly those from vulnerable communities—and how to increase spontaneous public participation.) However, representatives from government and civil society reported a series of implementation challenges. The program completed the first round on time. It hosted most of its workshops outside the city center, albeit under considerable challenges. Around 10 percent of the first-round trainings could not take place, according to official accounts.[168] Accounts from agents themselves vary greatly, due to their number and diversity and to the fact that each one hosted numerous trainings in different spaces and city localities. Overall, reports from agents reveal positive assessments of the program's infrastructure (i.e., venues and support material). Some expressed dissatisfaction with how the program was being managed. The reported insufficient dissemination and lengthy negotiations to schedule venues and times for workshops. These factors negatively impacted the overall figures of participants and training outcomes[169].

São Paulo Aberta's and COPI/CGM strived to put up a temporary website devoted to the program, with an online calendar for the first round of trainings.[170] In this, they partnered with the Education Secretariat. The site (which ended up running only for the first cycle) and virtual dissemination through Facebook was, nonetheless, insufficient. The government did not inform potential targeted participants in time. Thus, there was little time to share invitations with potential target beneficiaries. Another set of challenges resulted from miscommunications between agents and City Hall during the first cycle. The former complained about the strict interpretation by the CGM of the program's rules. They noted this interpretation resulted in some agents being officially warned with a notification[171] and/or not being paid. The missed payments were due to agents' failure to show proof (such as photos or attendance lists) of workshops being hosted. The government required such proof even when workshops did not take place

due to a lack of participants.[172]

On 29 September 2017, the São Paulo Aberta and COPI teams communicated to the CSOs from the Forum their intention to suspend the second round. The teams cited the lack of human resources to cope with the intense logistical demands to schedule all the remaining trainings and resources to guarantee proper dissemination of all remaining activities. The Forum CSOs expressed opposition. They noted that the 2017 edition already had a short implementation period and that the budget was already secured for this fiscal year and could not be re-allocated into next year's annual budget.[173] The government finally proceeded with second round, with the Inter-Secretarial Committee of Open Government's approval. The government conducted a more careful orientation with the second cohort of agents on the program's rules and implementation, which made implementation smother, according to City Hall. However, the second cycle also faced dissemination challenges, with the temporary website having been discontinued since October.[174] Thus, the program had to rely on agents' and partnering implementing agencies' dissemination efforts and on São Paulo Aberta's Facebook page to communicate upcoming trainings.

It is important to note that, despite a reduced human resources team, the governmental bodies leading this commitment secured a diverse range of partners to co-host trainings. These partnerships included other departments, Regional Prefectures,[175] the legislative branch, and local nongovernmental organizations.[176] Partner departments included the Education,[177] Justice,[178] Human Rights and Citizenship, and Culture[179] Secretariats and the Municipal School of Public Administration of São Paulo. Legislative branch help included the state-level Legislature and the Parliament School (Escola do Parlamento). The São Paulo Aberta team–informed trainings were hosted in all but one of the 32 Regional Prefectures[180].

Early results: did it open government?
Civic participation: Marginal

This commitment aimed at expanding and consolidating a promising pilot citizen-led training program on open government. Evidence of changes in governmental practices point to marginal gains. The status reflects the logistical challenges in implementation, made possible by a reduced implementation time frame and reduced human resources at the Municipal Secretariat for International Relations. According to an initial governmental monitoring report, 3,000 people benefitted from trainings during the first cycle (until October). The final figures provided by City Hall list 5,227 participants from all city regions, but with more participation in the East and South Zones.[181] São Paulo Aberta representatives attribute the smaller numbers in the second round to the tight calendar in the final months.[182] Also, the 2017 edition outreach extended to fewer participants than the pilot edition (2015–2016), when official accounts reported more than 15,000 people attending the workshops.[183] Results reveal, nonetheless, that the program brought a diverse set of thematic trainings to a range of locations, geographically and institutionally. The government made efforts to develop user-friendly language to democratize knowledge on open government. This was demonstrated in the way the program was initially designed in 2017, involving a number of relevant thematic secretariats and civil society in shaping the call for proposals. This was also reflected in multiple Forum efforts to negotiate where and with whom to partner and host workshops. The government also showed a willingness to negotiate with key partners in other governmental branches and civil society to achieve better inclusivity. Another promising result lies in the complementarity and synergies between governmental departments. For instance, the Human Rights and Citizenship Secretariat included open government agents' trainings in its annual Human Rights Festival and in its campaign for 16 days of activism on gender. The secretary personally encouraged civil

servants to attend the trainings.[184] With more time for planning and more human resources, the São Paulo Aberta and Integrity Promotion Division teams, as well as other stakeholders consulted, believe better results could have been achieved.

An existing pilot initiative in the OGP action plan already included assuring the program's continuity—beyond the OGP one-year implementation period—as one of its main goals. Civil servants at the technical level continuously reaffirmed their commitment to maintaining the Open Government Agents Program in 2018. They also plan to keep investing in adaptive reflection to make it more effective and efficient.[185] The program gained initial political support from its inclusion in the 2017–2020 City Mayor's Goals. Nonetheless, the commitment needs continuous tangible political commitment from the senior leadership across several secretariats, both in terms of human and financial resources. With these, the government could increase the program's transformative impact.

Recommendations

To move this commitment's intended reforms forward, the following recommendations should be considered by the São Paulo government:

1. Carry out a participatory evaluation of the second edition. Work with agents and workshop participants to identify challenges and opportunities to enhance this program's overall impact. Gather information on how to better adjust the program's design (call for proposal, time frames, roles and responsibilities of agents, roles and responsibilities of City Hall departments, etc.) and implementation.

2. Call for greater involvement of the Inter-Secretarial Committee of Open Government in the planning phase for next year's edition. Such involvement could help to strategically find synergies between secretariats for joint trainings and enhance the logistics of scheduling trainings across the city. This planning could make better use of existing sectoral networks and facilities streamline the use of human resources, and grant the Shared Management Forum a more strategic role in mobilizing target beneficiaries.

3. Reconsider adjusting the time frames for the overall program or the length of each agent cycle. A revised time frame could guarantee enough time to schedule meetings and disseminate information about them. Thus, the program would achieve better results in sensitizing vulnerable communities and other target citizen groups to participate.

4. Make sure the program will create and sustain an online repository for all trainings. This repository should include basic information on each training and an updated calendar for the cycle, posted ahead of the launching. This online repository should not be detrimental to other online and offline dissemination efforts tailored and targeted to specific groups for thematic clusters of trainings.

[155] Prefeitura de São Paulo, "Programa Agentes de Governo Aberto é premiado no Fórum de Inovação Social no Setor Público," 23 June 2017, http://www.prefeitura.sp.gov.br/cidade/secretarias/relacoes_internacionais/noticias/index.php?p=236436.
[156] For an official account of several of the previous trainings held during the first edition of the Open Government Agents Program, see São Paulo Aberta, *Memória da Iniciativa São Paulo Aberta* (São Paulo: Prefeitura de São Paulo, 2016), https://issuu.com/spaberta/docs/livro_sp_aberta.
[157] See "Copia de Mapeamento de Intensidade de Participacao Final," https://docs.google.com/spreadsheets/d/1KoT_XofZPfBR0pRlZvtOaB11S6CZxnwmy49ZZh9Dv4/edit.

158 See "Audience and Public Consultation for the Public Notice Open Government Agents," Prefeitura de Sao Paulo Relacoes Internacionais, http://www.prefeitura.sp.gov.br/cidade/secretarias/relacoes_internacionais/noticias/index.php?p=232437.

159 The virtual consultation was hosted through the National Congress platform E-Democracia (see https://edemocracia.camara.leg.br/wikilegis/bill/67). An official account of the public hearing is available at http://www.prefeitura.sp.gov.br/cidade/secretarias/controladoria_geral/noticias/?p=233136.

160 Interview with Vanessa Menegueti from CGM/COPI (9 November 2017).

161 Personal communication with Joara Marchezini (17 November 2017).

162 Available at http://cafehacker.prefeitura.sp.gov.br/wp-content/uploads/2017/04/Agentes-de-governo-aberto-2017-vers%C3%A3o-final.pdf.

163 See "Minutes of the XI Forum Meeting (08/06/2017)," to which the IRM researcher had access.

164 All CIGA-SP members were invited to take part in the selection process.

165 Approximately US $310 per month.

166 According to the *Official Gazette,* the total cost for hiring the agents was R $226,517.76. During the call for proposal phase, City Hall announced the total budget secured for this year's program was R $257,978.25, all costs included (scholarships, office supplies, taxes). See http://www.prefeitura.sp.gov.br/cidade/secretarias/relacoes_internacionais/noticias/index.php?p=232437.

167 Interview with Marina Luna, civil servant from SMDH (29 November 2017).

168 Interview with Vanessa Menegueti, civil servant from COPI/CGM (9 November 2017).

169 Interview with Bernardo Crispim Barone, Open Government Agent (September 4th, 2017).

170 See the website developed to harbor information on the program, including a detailed description of the trainings and workshops and a calendar, at http://intranet.sme.prefeitura.sp.gov.br/Sãopauloaberta/oficinas/.

171 See "Diario Oficial de Cidade de Sao Paulo," http://www.docidadesp.imprenSãoficial.com.br/NavegaEdicao.aspx?ClipID=8F7PRLP8QFR8Qe5JOTLML01TSDC&PalavraChave=%22governo%20aberto%22.

172 Interview with Vanessa Menegueti, civil servant from COPI/CGM (9 November 2017).

173 See "Minutes of the XIV Forum Meeting (29/09/17)," to which the IRM researcher had access.

174 See the calendar for the workshops, not including activities after September 2017, at http://intranet.sme.prefeitura.sp.gov.br/Sãopauloaberta/calendario/2017-10/, last accessed 23 November 2017. A list of all second-round workshops was made public on the São Paulo Aberta Facebook page and can be seen at https://drive.google.com/file/d/0B91yVgdvPA9-ZVRDMnlGbW10Vjg/view.

175 "Diario Oficial da Cidade de Sao Paulo," http://www.docidadesp.imprenSãoficial.com.br/NavegaEdicao.aspx?ClipID=DFG9PKDAET45SeEHKVLG7HBTTLA&PalavraChave=%22governo%20aberto%22.

176 Trainings were hosted, for example, in partnership with the nongovernment organization Plana, and with the youth education organization Cursinho Popular da ACEUSP.

177 For instance, in partnership with the Education Secretariat, trainings were hosted in the Digital Courtyard (Pátio Digital) and in some secondary technical schools. See http://www.docidadesp.imprenSãoficial.com.br/NavegaEdicao.aspx?ClipID=FH3NUL2F69IECeF2U9A8BCD92CU&PalavraChave=%22governo%20aberto%22.

178 For instance, with the a public LGBT center (Centro de Cidadania LGBT Laura Vermont, Leste).

179 For instance, youth cultural centers (centros da juventude) located in less well-off neighborhoods.

180 See implementation report from São Paulo Aberta included in the December 2017 OGP communication plan, in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.

181 Figures were retrieved from the draft version of the Annual Report of São Paulo Aberta Initiative, last accessed by the IRM researcher in March 2018.

182 Interview with Ana Dienstmann and Eduardo Barboza, civil servants at the SMRI/São Paulo Aberta Initiative (1 December 2017).

183 See São Paulo Aberta, *Memória da Iniciativa São Paulo Aberta* (São Paulo: Prefeitura de São Paulo, 2016).

184 Interview with Marina Luna, civil servant at the Secretariat of Human Rights and Citizenship (29 November 2017). For examples of trainings co-hosted with SMDH, see https://issuu.com/smdhc17/docs/livreto_16_dias_ativismo_smdhc.

185 Interview with Ana Dienstmann (7 August 2017); interview with Vanessa Menegueti, civil servant from COPI/CGM (9 November 2017); and interview with Marina Luna, civil servant from SMDH (29 November 2017).

3. Communication: Increase governmental communication on open government actions

Commitment text:

Increase the use of means of communication by São Paulo City Hall to spread open government actions in newspapers, TV channel, buses, public municipal venues, alternative media, dialoguing with the Legislative Branch, in order for these means to become strategic and permanent ways of communication.

Milestones

1. Develop a communication plan to expand and diversify outreach efforts of open government initiatives so that it reaches more civil servants and citizens, starting from a previous analysis of the means currently in use.

2. Integrate outreach actions on open government with the institutional general communication strategy of São Paulo City Hall, so that municipal administration incorporates open government values.

3. Execute this communication plan on Open Government actions.

Commitment overview

Status of Completion	Limited
Start Date	January 2017
Intended Completion Date	December 2017
Responsible Office	São Paulo Aberta, in partnership with the Municipal Secretariat of Communication and the Municipal Secretariat of Government
Did It Open Government?	Did not change

Is it a STAR commitment?	No
Starred commitments are considered exemplary OGP commitments. To receive a star, a commitment must meet several criteria: - It must be specific enough that a judgment can be made about its potential impact. Starred commitments will have "medium" or "high" specificity. - The commitment's language should make clear its relevance to opening government. Specifically, it must relate to at least one of the OGP values of Access to Information, Civic Participation, or Public Accountability. - The commitment would have a "transformative" potential impact if completely implemented. - Finally, the commitment must see significant progress during the action plan implementation period, receiving an assessment of "substantial" or "complete" implementation.	

Commitment Overview	Specificity				OGP Value Relevance				Potential Impact				Completion				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Tech. and Innov. for Transparency and Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Complete	Worsens	Did not change	Marginal	Major	Outstanding
Overall		✔			Unclear					✔				✔				✔			
3.1 Development of outreach and communication plan		✔								✔				✔							
3.2 Integration into City Hall's general communication strategy				✔						✔			✔								
3.3 Implementation of plan		✔								✔				✔							

Commitment Aim

Overall Objective & Relevance

This commitment addresses citizens' lack of awareness and knowledge on São Paulo City Hall open government actions and policies. The objective, as stated in the action plan, aims to expand, diversify, and ensure continuity in the dissemination of open government actions promoted by the São Paulo municipal government.[186] To address this communication and outreach challenge, the government has committed to developing and implementing a communication plan on São Paulo's open government initiatives. In this effort, it will use a diverse set of communication tools, including online platforms, billboards, and newspapers. These tools, conceived to enhance communication, could improve the general understanding of government activities. However, it is unclear what information is to be distributed and whether it pertains to government-held information, as opposed to information on general government activities that could be found through other means. Although the purpose of this commitment is laudable, the IRM researcher considers it not relevant to the values of open government as defined in the IRM Procedures Manual.[187]

Specificity and Potential Impact

This commitment was broadly framed. Its specificity is low. It describes activities that can be construed as verifiable but requires some interpretation by the reader to identify measurable deliverables. For example, it is not sufficiently precise on information in the communication plan, vehicles and/or mediums

to be prioritized, and target audiences for this outreach effort, if there are any. If fully implemented as written, this commitment would have a minor impact. It constitutes an incremental but positive step to improve the lack of awareness and knowledge on open government initiatives.

Completion
Limited

This commitment had a limited implementation. The intended communication plan took several months to be finalized by the government. The government limited the modest final product to a few communication outlets. The plan also lacked an underlying strategic vision. The electoral transition resulted in many delays and changes regarding this commitment. Those changes involved implementing partners within government and the expected activities (i.e., the communication plan itself) during implementation.

The São Paulo Aberta team led several attempts to re-engage the Secretariat of Communication to jointly agree on an open government communication plan. The plan would be "integrated into the institutional general communication strategy of São Paulo City Hall" (as defined in the second milestone). However, this harmonization did not happen. With little external support from the original implementation partner, the São Paulo Aberta team sought alternative partnerships. Within government, these efforts involved the Secretariat of Education. Efforts also involved Shared Management Forum (the Forum) members from civil society. Ana Dienstmann, responsible for communication at São Paulo Aberta, explained that due to those unforeseen challenges, in July 2017, São Paulo Aberta approached the Forum to discuss an alternative—and more modest—version of the plan.[188] The Forum agreed internally on a revised version of the communication plan. The Forum publicized the plan in late December 2017, with an implementation report, a proactive accountability and public justification exercise.[189] According to the document, three areas were prioritized: (i) website, (ii) communication in the territory, and (iii) social media.

Throughout the year, the government implemented this alternative communication strategy. It focused on immediate communication needs regarding the remaining commitments, particularly Commitments 1 and 2 (Participation and Training, respectively).[190] It also concentrated on re-establishing a website for São Paulo Aberta, the previous one having been discontinued after the end of the previous municipal administration. São Paulo Aberta's focused on the website because the Municipal Secretariat for International Relations had no specific budget allocated to this commitment. Thus, the secretariat could not, for instance, pay for television time (as implied in the commitment text) for communicating open government.[191]

Since the first three months, the government envisioned the temporary solution of establishing a WordPress portal for open government initiatives. This portal would be placed under existing Secretariat of Education virtual platforms (for instance in the Pátio Digital platform), while the government negotiated with external providers to develop a new portal. In September 2017, São Paulo Aberta communicated to Forum members that the new website was ready and would be open to the public upon final approval of the Secretary of Education.[192] However, pending approval lingered throughout the implementation period.[193] Without that virtual space, governmental communication efforts on the OGP plan were fragmented, taking place through a series of disconnected online platforms. The open government information temporarily displayed in the official City Hall online Transparency Portal (Portal da Transparência) was scarce and not regularly updated.[194] The government

created a smaller website with a limited scope for the Open Government Agents Program. The Secretary of Education's virtual space also hosted this website, which functioned until October 2017.

Consequently, overall OGP dissemination relied mostly on alternative online communication tools (email and listservs) and social media, particularly São Paulo Aberta's Facebook page.[195] The Facebook page currently stands as the most complete information repository of the pilot action plan outputs. Despite being an interactive tool for the government to engage with citizens, the Facebook page does not fulfill the need for a comprehensive and organized repository and a project tracker for OGP-related actions and outputs.

Forum members acknowledged that circumventing those structural challenges would have required significant additional efforts. Such efforts were mostly of a political nature and would have to be led by those in higher positions. These efforts seemed beyond the reach of the few technical civil servants at São Paulo Aberta. Forum civil society organization (CSO) representatives also admit they had little resources or energy to broker the situation. The Forum had assigned few civil society representatives to assist the government in developing the plan. These representatives were minorly engaged in implementation, creating the need for other—already overtaxed—CSOs to replace them later in the year. Amid this complicated scenario, stakeholders prioritized urgent demands from other commitments. According to one civil society representative from the Forum: "Communication matters. In the world we live in, no information means it does not exist. An initiative, like OGP, can also die of invisibility."[196]

Early results: did it open government?
Did not change

The low specificity and lack of clearly defined outcomes of Commitment 3 resulted in a more narrow and instrumental interpretation of how to communicate open government during implementation. This was further accentuated by multiple implementation challenges encountered by the São Paulo Aberta team.

The dissemination and outreach occurring on the remaining commitments, and the continuous individual efforts from civil servants within São Paulo Aberta, remain centrally important. However, the intended communication activities were delayed and their implementation limited.

Contrasting with the commitment language, the informal plan ultimately carried out *informed* targeted citizens involved in the OGP process about events and activities for commitment implementation. It relied on very similar means and outlets used in the past. The Secretariat of Communication did not incorporate the plan. Hence, the commitment fell short of communicating open government to citizens at large and reaching out beyond the usual suspects already connected to São Paulo Aberta's network, particularly through social media. The modest version of the communication plan struggled to secure a proper website for gathering citizen-friendly information on open government. It also did little to leverage the interactive potential of new communication tools for mobilization purposes. Without a proper public online platform and repository, information on open government remains scattered and of little use for building and sustaining citizen mobilization and engagement.

More encouraging initial results exist for the commitment's aim to create a "dialogue with the Legislative power" to boost those outreach efforts. The IRM researcher notes that the government built some important alliances with other governmental bodies, including the legislative power, for the joint Open Government Agents Program workshops (Commitment 2: Training). Those alliances unequivocally had a

dissemination and outreach potential. Those open government, citizen-led trainings—which are, by nature, more decentralized and less dependent on virtual outlets—do partially contribute to this intended dissemination effort. However, they do not constitute a coherent governmental communication strategy on open government. Overall, communication on open government during this first pilot year was mostly informative and did not reach its aimed sensitizing and mobilizing potential.

Recommendations

To move this commitment's intended reforms forward, the following recommendations should be considered by the São Paulo government:

1. Make sure City Hall has a proper online repository of its open-government-related initiatives. The repository should include those initiatives carried out as part of OGP. It should also function both as a site of institutional memory, and a mobilization tool to secure and sustain government and civil society engagement in the future.
2. Host an Inter-Secretarial Committee on Open Government meeting to agree on a modest and cross-sectorial plan. The plan should cover how to disseminate open government initiatives. It should also use available communication outlets and communication human resources within relevant secretariats, in addition to those established by São Paulo Aberta.
3. Proactively engage civil society, citizen journalists, and technology groups (for instance, those identified in Commitment 5 as innovation actors). Engage them to find collaborative solutions to build and sustain a live platform for open government in the city. These solutions can include governmental policies and programs, those listed as part of the OGP action plan, and citizen-led initiatives. OGP itself can be a valuable hub and a complementary source for innovative collaborations.

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[186] Eduardo Barboza, public servant at the São Paulo Aberta Initiative, opening speech, Open Dialogue with the Participative Council, Jabaquara, 11 July 2017.
[187] See IRM Procedures Manual, p. 44, https://opengovpartnership.org/documents/irm-procedures-manual.
[188] See "Minutes of the XII Forum Meeting (13/07/2017)," to which the IRM researcher had access.
[189] Prefeitura de São Paulo, Relações Internacionais, "Plano de Comunicação de Governo Aberto," 20 December 2017, http://www.prefeitura.sp.gov.br/cidade/secretarias/relacoes_internacionais/noticias/?p=247324. For the full document, see "#3_Communication Plan_SP Aberta" in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.
[190] Interview with Renata Galf from Transparência Brasil (14 November 2017), and interview with Haydee Svab from Transparência Hacker (23 November 2017).
[191] Interview with Ana Dienstmann (7 August 2017).
[192] See "Minutes of the XIV Forum Meeting (29/09/17)" and "Minutes of the XII Forum Meeting (13/07/2017)," to which the IRM researcher had access.
[193] The São Paulo Aberta communication plan, made public in December 2017, sets February 2018 as the new deadline for the website to be fully functional. An update from São Paulo Aberta, in May 2018, details that "the website underwent a budget review, no longer being necessary, for contractual reasons, to develop it together with Prodam (Information and Communication Technology Company of the Municipality of São Paulo), since the guidelines for contracting technology services had changed and it would be possible to achieve a less-costly solution, which is currently underway".
[194] For example, only three out of the five OGP commitments were present on the portal, numbers 1, 2, and 4. They mostly included a news format, invitations to meetings, or communications on the launch of the Open INFO Network. But the portal does not serve as an institutional repository of comprehensive information. See http://transparencia.prefeitura.sp.gov.br/Paginas/Governo-Aberto.aspx and http://transparencia.prefeitura.sp.gov.br/Paginas/Historico-de-Noticias.aspx.
[195] For the São Paulo Aberta Facebook page, see https://www.facebook.com/profile.php?id=1469765476577024&ref=br_rs.

[196] Interview with Joara Marchezini and Caroline Burle from RETPS (21 November 2017), interview with Renata Galf from Transparência Brasil (14 November 2017), and interview with Haydee Svab from Transparência Hacker (23 November 2017).

4. Institutionalization: Create a network of civil servants working on open government

Commitment text:

Create a network of civil servants involving all City Hall secretariats, entities and public venues, dialoguing with CIGA (the Intersecretarial Committee on Open Government) and São Paulo Aberta (Open São Paulo Initiative).

Milestones

1. Create a statute to this network with the definition of principles and roles for its members, elaborating a campaign of outreach and sensibilization on the importance of open government initiatives and mobilizing servants to take part in the network.

2. Nominate two servants per secretariat, with a participative profile, being one of them a permanent civil servant.

3. Conduct meetings with CIGA and São Paula Aberta representatives every three months to develop transversal initiatives on open government and promote open government trainings in each secretariat.

Commitment overview

Status of Completion	Complete
Start Date	01/01/2017
Intended Completion Date	31/12/2017
Responsible Office	Office of the Municipal Comptroller
Did It Open Government?	Marginal

Is it a STAR commitment?	No
Starred commitments are considered exemplary OGP commitments. To receive a star, a commitment must meet several criteria: - It must be specific enough that a judgment can be made about its potential impact. Starred commitments will have "medium" or "high" specificity. - The commitment's language should make clear its relevance to opening government. Specifically, it must relate to at least one of the OGP values of Access to Information, Civic Participation, or Public Accountability. - The commitment would have a "transformative" potential impact if completely implemented. - Finally, the commitment must see significant progress during the action plan implementation period, receiving an assessment of "substantial" or "complete" implementation.	

Commitment Overview	Specificity				OGP Value Relevance				Potential Impact				Completion				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Tech. and Innov. for Transparency and Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Complete	Worsens	Did not change	Marginal	Major	Outstanding
Overall			✔		Unclear							✔				✔			✔		
4.1 Network Statute		✔										✔				✔					
4.2 Nomination of civil servants				✔							✔					✔					
4.3 Trimestral meetings and training		✔										✔				✔					

Commitment Aim

Overall Objective & Relevance

This commitment tries to address the lack of an institutional open government agenda within the São Paulo administration. It also aims to promote City Hall civil servant awareness of, involvement in, and commitment on open government themes. It moves toward an internal reform, promoting greater buy-in of the open government agenda within the municipal public administration and among civil servants.

The government proposes to establish a wide network of civil servants committed to open government initiatives within their own areas of work. This network would operate in close collaboration with the Inter-Secretarial Committee of Open Government (CIGA). CIGA is in charge of strengthening, connecting, and disseminating the open government agenda, actions, and policies in São Paulo.[197]

Through this network, civil servants would receive theoretical and hands-on trainings on open government. These trainings would include those about improving compliance with the municipal access to information law and about developing open government pilot initiatives.

This commitment constitutes a laudable step to advance internal awareness raising, capacity building, and promotion of political buy-in for open government reforms. However, this commitment, as articulated, does not meet the IRM test of "clear relevance" to OGP values due to the lack of a public-facing element. According to the IRM Procedures Manual, clearly relevant commitments are not privileged or internal to government. Hence, in spite of aiming to strengthen internal mechanisms and build capacity, this commitment lacks the necessary complementary, public open government activities (for municipal citizens). For instance, it does not include initiatives calling for the publication of government-held information or those involving citizens in decision-making processes.[198]

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The commitment language would benefit from fine-tuning to present clearer, verifiable activities and measurable deliverables, since some of the language can be subject to interpretation. For example, it is unclear how many "transversal initiatives on open government" and "open government trainings in each secretariat" are to be carried out and what their timeframes are. Greater specificity would help in commitment implementation and the planning of future network activities.

If fully implemented as written, this commitment could have a transformative impact. The network constitutes a major step forward in the institutionalization of municipal open government initiatives. It also could serve as a concrete tool to foster internal change among local civil servants and create political buy-in. In the long run, accompanied by other internal consolidation efforts—such as CIGA enlargement and empowerment—this network could be a highly transformative tool. A positive sign exists in the inclusion of the five OGP-related commitments in the City Mayor's Goals for 2017–2020, approved early 2017 (please refer to the Institutional and Subnational Context and Scope of Action Plan section). Having become part of the City Mayor's Goals, some activities have gained a four-year implementation plan, with concrete deadlines and deliverables.

Completion
Complete

The government completed the first milestone for this commitment in time. It formally launched the Open INFO Network (Rede INFO Aberta) in May 2017. The network is legally bounded by an inter-secretarial administrative act (*portaria*) issued on 29 May 2017.[199] This administrative act associates the new network with existing obligations provided for in the Federal Access to Information Law (2011), the Municipal Executive Decree installing the São Paulo Aberta Initiative (2014), and the OGP 2017 pilot action plan. The act also regulates the workings of the network. This work should be devoted to trainings, capacity building, and dissemination of open government principles, concepts, and tools within the City Hall public administration. The act updates the network's scope from a purely access to information focus[200] to a broader open government mandate. It creates the role of the open government focal point as an addition to the role of access to information focal point (commonly referred to as E-SIC focal points). The new role now exists in all public departments.

To officially launch the Open INFO Network, the Office of the Municipal Comptroller (CGM) hosted an event on 18 May 2017. The event brought together more than 100 people, including civil servants from secretariats and Regional Prefectures.[201] The launching coincided with the fifth anniversary of the Brazilian national access to information law.[202] The then Integrity Promotion Division (COPI) coordinator, Thomaz Anderson Barbosa da Silva,[203] outlined the dual trainings streams to be promoted by the network in 2017. One would involve access to information–related issues, including tailored trainings on how to comply with the municipal access to information legislation and how to solve practical access to information issues. The second stream would focus on open government issues. Barbosa presented the public with the meeting calendar for the year, as well as the thematic focus for each of the scheduled trainings. For the launching, COPI reached out to civil servants already engaged in previous Open INFO Network activities. COPI sent further invites electronically.

Regarding the second milestone, the COPI/CGM team secured two official nominations from relevant secretariats and Regional Prefectures to represent their departments in the network. According to Vanessa Menegueti from COPI/CGM, secretariats and Regional Prefectures have also officially

nominated two other civil servants to the Open INFO Network as open government focal points. Besides official nominations, COPI/CGM initially mapped at least 85 other interested civil servants willing to take part in the initiative.[204]

The government also completed the third milestone on time. It refers to hosting the network activities throughout 2017, namely the meetings and trainings. For the first stream on access to information, CGM worked with the Municipal School of Public Administration of São Paulo (EMASP). They planned and executed a 16-hour course (divided into four sessions) for the access to information (or E-SIC) focal points. The course grants official certification and career incentives for civil servants completing the trainings.[205] Civil servants at CGM reported that 70 municipal civil servants registered. Yet effective participation was not sustained at those levels, decreasing to approximately 30 civil servants in the last two meetings. Nonetheless, the CGM course coordinators deemed those who attended as very committed.[206] For the second stream on open government, the government successfully hosted four meetings (in June, August, October, and December).[207] These meetings focused on open government themes such as participation, integrity, technological innovation. They used hands-on experiences from current initiatives in City Hall, such as Pátio Digital from the Secretariat of Education and the integrity and anti-corruption initiatives in the Environment Secretariat. Trainings also included sessions for civil servants to design potential pilot open government initiatives for their own departments, to be implemented in the future. According to Vanessa Menegueti from COPI/CGM, initial trainings gathered between 80 and 100 people, but participation went down to around 30 civil servants in the final meetings. Participants came from different public departments, including sectorial secretariats (such as Education, Health, Sports, and Human Rights and Citizenship, to name a few) and Regional Prefectures. They also hailed from decentralized departments responsible for local urban maintenance and for coordinating service delivery in the territories.[208] Unlike in the trainings for the first group, CGM did not host trainings on open government jointly with EMASP.[209] Because of the open government trainings, City Hall encouraged each secretariat to set up its own pilot open government plan and publicly announce them during the fourth workshop. This workshop would feature a joint meeting for civil servants of both training streams (access to information and open government). They would be joined by high authorities from the secretariats as well. The joint meeting never happened. Nonetheless, in the final meeting of the open government stream, hosted on 1 December 2017, different governmental institutions presented 12 pilot projects to be implemented from 2018 on. Projects presented included pilot access to information and open data initiatives from line secretariats such as Transport and Environment. The Transport project would enhance responsiveness to information requests on city mobility and transportation issues. The Environment project would provide open data on public planting. Also, among the Regional Prefectures projects was Lapa, which would create a GIS-map of trees in the neighborhood. The Regional Prefectures project Vila Mariana would create an integrated database on local services provided by the Regional Prefecture.[210]

Early results: did it open government?
Access to information: Marginal

This commitment responds to a shared diagnosis by City Hall staff working on open government and nongovernmental stakeholders who play a monitoring role. They agree on the importance of institutionalization in sustaining existing open government initiatives by promoting internal buy-in from civil servants and creating internal champions and reformers for future initiatives. Thus, the commitment aimed to build on the existing civil servants' network on access to information while expanding its thematic focus to other relevant open government areas.

The initial diagnosis, done in 2016, had specifically identified a set of institutionalization challenges. There was a need to move beyond transparency as a thematic boundary. Institutionalization efforts needed to involve and engage high-level authorities in a larger number of sectorial secretariats. They also had to include Regional Prefectures and local public facility managers as network members and beneficiaries of capacity-building interventions.

Based on those objectives, the IRM researcher found evidence of encouraging initial achievements at an output level. Achievements occurred in terms of capacity-building activities and initial mobilization of civil servants to autonomously execute pilot open government projects within their own policy areas. Early results from those commitments include, for instance, 12 new pilot projects, mostly transparency-related, from civil servants in a range of policy sectors. They designed these projects and publicly presented them to the network. The projects will be implemented in their departments from 2018 on.[211] The IRM researcher also found positive effects even when secretariats were not able to put in place a project proposal. The Open INFO Network's inspirational and sensitizing role still prompted some of them, such as the Secretariat of Human Rights and Citizenship, to internally commit to this exercise in 2018, particularly regarding information management and access to information.[212] Through this incubator role, the network seems well positioned to serve as an internal mobilizing tool for promoting and sustaining the open government agenda within City Hall. For this reason, although the commitment's relevance to OGP values is unclear, the IRM researcher believes that it led to an improvement of access to information policies and change in government practices.

Looking forward, and considering the network's recent institutionalization and inclusion in the City Mayor's Goals for 2017–2020, the network should continue expanding its trainings outreach and aiming at another level of institutionalization. It can accomplish the expansion by first mobilizing its recently appointed open government and access to information focal points as multiplying agents within their own departments. Further institutionalization efforts can be done by engaging senior management and creating concrete incentives for civil servants to participate. Pilot projects developed in 2017 can be powerful entryways for sustaining and broadening civil servants' engagement internally in each department. Program and policy discontinuities and institutional instability in some relevant transparency and open government areas in the last year further substantiate the need for high authorities in São Paulo to show clearer commitment to those agendas. (See Institutional and Subnational Context and Scope of Action Plan section.) Their involvement can incentivize localized sectoral projects that improve departments' efficiency, transparency, and accountability. Their commitment can also increase the mayoral cabinet's own activities related to improving transparency and open government in the city.

Recommendations

To move this commitment's intended reforms forward, the following recommendations should be considered by the São Paulo government:

1. Continue to expand the Open INFO Network outreach to technical-level civil servants and local authorities in all direct and indirect governmental bodies. This can be done through new cycles of hands-on trainings and continued tailored support for sectoral departments and Regional Prefectures to build their own pilot open government projects.
2. Through the Inter-Secretarial Committee of Open Government, establish trust-based spaces for high-level local authorities to exchange on and commit to the transparency and open government agendas. These authorities include those in the mayor's cabinet, secretariats, and

Regional Prefectures. Programs like the Mayor's Challenges can further provide a complementary set of incentives for local authorities to commit to the agenda and mobilize their teams to develop pilot open government initiatives.

3. Reinforce capacity development initiatives in all open government themes. Link access to information initiatives to other mechanisms for enhancing citizen participation and fostering public accountability, including through technological innovation. Use São Paulo's own long-standing experience and network of participatory experiments with a range of social policies. This history can provide civil servants with inspirational and concrete examples of how an open government works in practice.

4. Foster synergies among governmental branches, departments, and initiatives. Look for opportunities to connect Open INFO Network activities to the emerging innovation labs and hubs network (see Commitment 5: Innovation). Also seek to develop pilot joint activities with the municipal and state legislative powers, for mutual learning on pioneer open government initiatives, such as on citizen-focused approaches to open-data.

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[197] See Executive Decree No. 54.794, from 28 January 2014, http://www3.prefeitura.sp.gov.br/cadlem/secretarias/negocios_juridicos/cadlem/integra.asp?alt=29012014D%20547940000.

[198] See IRM Procedures Manual, pp. 30–32, https://opengovpartnership.org/documents/irm-procedures-manual.

[199] See the publication in the *Official Gazette* of 9 June 2017, http://www.docidadesp.imprenSãoficial.com.br/NavegaEdicao.aspx?ClipID=7QUI18VVPF080e2FAJ7CVVBIALK&PalavraChave=rede%20info%20aberta.

[200] According to Gustavo Vidigal, former São Paulo's OGP point of contact, the previous Open INFO Network was comprised of around 250 civil servants. Interview with Gustavo Vidigal (8 May 2017).

[201] See official City Hall news on the event, http://www.prefeitura.sp.gov.br/cidade/secretarias/controladoria_geral/noticias/?p=234818, accessed 8 November 2017.

[202] Dr. Mendes was discharged from the position later in the year, in August 2017. For more on the episode, see the Institutional and Subnational Context and Scope of Action Plan section.

[203] Thomaz resign after Dr. Mendes de Barros was dismissed in August 2017.

[204] See "General Comptroller of the Municipality Launches the 'Open Info Network," Prefeitura de Sao Paulo Controladoria Geral, http://www.prefeitura.sp.gov.br/cidade/secretarias/controladoria_geral/noticias/?p=234818.

[205] See "Access to Information Course Syllabus" in the "São Paulo_ IRM Repository of Evidences" folder, available at http://bit.ly/2v0fBYy.

[206] Interview with Vanessa Menegueti, civil servant at CGM (14 November 2017). Figures were provided to the IRM researcher by the COPI/CGM team, along with the attendance sheet for all workshops hosted in 2017.

[207] The IRM researcher attended the launching meetings as well as the second network meeting in August 2017.

[208] Official attendance sheets (the IRM researcher was given an electronic copy) count 80 civil servants taking part in the first workshop (June 2017), 58 in the second (August 2017), 31 in the third (October 2017), and 35 in the final (December 2017).

[209] According to Menegueti, the level of commitment and obligations EMASP courses traditionally require was perceived by CGM as unnecessarily rigid for the first year. They thought the requirements imposed an extra burden on civil servants at this stage, risking demotivating rather than incentivizing those who wanted to commit on a voluntary basis but could not assure attendance at all courses.

[210] The full list of governmental institutions having presented open government pilot projects for 2018 include SPTrans, SMRI, CET, CGM, SMPED, SMADS, SMG, SMIT, SVMA, Regional Prefecture Lapa, Regional Prefecture Vila Mariana, and PGM. The IRM researcher was given access to all 10 presentations in their original PowerPoint format.

[211] See "Minutes of the XII Forum Meeting (13/07/2017)," to which the IRM researcher had access.

[212] Interview with Marina Luna, civil servant at SMDH (29 November 2017).

5. Innovation: Bolster São Paulo City Hall's network of innovation spaces and labs

Commitment text:

Improve and straighten [strengthen] the network of innovation spaces and labs from São Paulo City Hall, such as the Laboratório de Mobilidade Urbana de São Paulo (MobiLab), the Pátio Digital (SME) and the LabProdam, to become more open to social participation, technological innovation and to the use of open data, mapping the groups already working on free technology (as, for example, free software, open data principles and web patterns), youth groups, startups and collectives to develop open government projects.

Milestones

1. Conduct a collaborative mapping of the existing groups working on open technology and innovation and create a public network with interested entities in becoming partners of the innovation spaces from the City Hall.

2. Provide spaces for coworking, attending [abiding by] each innovative space guidelines, where young people, startups and collectives can develop projects in a collaborative format, having as reference the Laboratório de Mobilidade Urbana de São Paulo (MobiLab) and the Pátio Digital (SME).

3. Develop projects in partnership with these groups in order to encourage social participation, transparency and/or integrity through technological innovation, using free open tools (as for example free software and applying the open data principles and web patterns).

Commitment overview

Status of Completion	Limited
Start Date	January 2017
Intended Completion Date	December 2017
Responsible Office	Municipal Secretariat for Innovation and Technology and Municipal Secretariat for International Relations
Did It Open Government?	Marginal

Is it a STAR commitment?	No
Starred commitments are considered exemplary OGP commitments. To receive a star, a commitment must meet several criteria: - It must be specific enough that a judgment can be made about its potential impact. Starred commitments will have "medium" or "high" specificity. - The commitment's language should make clear its relevance to opening government. Specifically, it must relate to at least one of the OGP values of Access to Information, Civic Participation, or Public Accountability. - The commitment would have a "transformative" potential impact if completely implemented. - Finally, the commitment must see significant progress during the action plan implementation period, receiving an assessment of "substantial" or "complete" implementation.	

Editorial Note: This commitment was updated by the government of São Paulo and resubmitted to OGP on June 2017. This commitment's modification relates to the changes in the city administration after the 2016 municipal elections[213] and, according to civil servants from the Municipal Secretariat for

Commitment Overview	Specificity				OGP Value Relevance				Potential Impact				Completion				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Tech. and Innov. for Transparency and Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Complete	Worsens	Did not change	Marginal	Major	Outstanding
Overall			✔			✔		✔			✔			✔					✔		
5.1 Collaborative mapping			✔			✔		✔		✔					✔						
5.2 Co-working spaces			✔			✔		✔			✔			✔							
5.3 Joint projects		✔				✔		✔			✔			✔							

Commitment Aim

Overall Objective & Relevance

This commitment seeks to address two main issues. It focuses on the lack of sufficient accessible data from São Paulo City Hall. It also seeks to create a mechanism that stimulates technological innovations, social participation, and use of public data. To tackle these challenges, the government aims to foster innovation and citizen participation in a series of City Hall innovation hubs and labs. These include the São Paulo Urban Mobility Laboratory (Laboratório de Mobilidade Urbana de São Paulo, MobiLab), the Education Secretariat–led Digital Courtyard (Pátio Digital), and the Public Company Laboratory (LabProdam). It also aims to integrate those innovation hubs into one network capable of boosting project development and innovative technological solutions to city problems.

This commitment will map and engage civil society groups working on open technology. It will also open the existing innovation hubs and labs to those actors and develop joint open-government-related projects with them.

The commitment combines the consolidation of spaces for citizen-driven and citizen-led technological innovation in urban challenges with the integration of existing technological innovation hubs and labs. Thus, it contributes to two OGP values: civic participation and technology and innovation for transparency and accountability.

Specificity and Potential Impact

The IRM researcher considers this commitment of medium specificity. It provides a set of activities that could be verifiable. However, fully measuring the outcome would require interpretation from the reader. For instance, the first milestone vaguely defines the planned "public network" with civil society technology and innovation groups both by its format and its activities. Also, the creation of a "network of innovation spaces" (mentioned as part of the overall commitment text) is not further explored or translated into concrete activities in a separate milestone. Finally, regarding the second and third milestones, more specificity could have been provided on the planned joint projects to be developed within this network of innovation hubs and labs. For example, the commitment could outline what type of projects and/or how many new initiatives.

If fully implemented as written, this commitment would have an incremental potential impact. Yet it would be a positive step to strengthen existing open technological innovation hubs and labs and create opportunities for developing new innovation pilots in other thematic and sectorial policy areas.[215]

Completion
Limited

This commitment was officially reformulated during implementation and had limited completion. The government changed the original language in June 2017, following a lengthy internal negotiation process during the first six months. City Hall changed the language because the agreed-upon 2016 text did not fully reflect the institutional changes within the Municipal Public Technology Company (PRODAM), nor did it match the priorities of the incoming government.[216] Informants from the newly created Secretariat for Innovation and Technology (SMIT) suggested that it was a strategic change to embrace new open government initiatives carried forward by the current government, such as the Municipal Policy of Information Technology and Communication Governance (PMGTIC), the new arrangements for government-society interaction as the *Residência Maker* (in partnership with the Health Secretariat and the Federal Savings Bank - Caixa Econômica Federal) and the partnerships with national and international innovation laboratories[217].

Negotiations took place within City Hall and between government and civil society organizations in the OGP Shared Management Forum (the Forum). On the government side, dialogue took place between the Municipal Secretariat for International Relations (SMRI) and SMIT). SMRI and the Office of the Municipal Comptroller—the governmental bodies in the Forum—also worked together. They strived to reconcile what civil society perceived as the intended open government aim of the commitment, and the incoming government vision on how to foster public policy innovations and what should be prioritized. Civil society focused on citizen participation, citizen-led technological innovation, and open software. As a compromise solution, the government hosted a new round of public consultations on this commitment. Its virtual consultation received no contributions. It also hosted a public hearing on 8 June 2017 to present the introduced changes in the commitment language and hear from the public.[218] The new language emphasized the government's commitment to "open innovation." This innovation included the promotion of citizen participation and citizen co-creation of technological innovation in a series of labs and innovation hubs not only in PRODAM. These efforts would simultaneously encourage city's innovation hubs to act in a networked manner. During the first six months of the year (even before the final agreement on the commitment's new language), São Paulo Aberta initiated implementation of the first milestone. It sought to conduct collaborative mapping of the existing groups working on open technology and innovation in the city. The outcome of this mapping is available online.[219] Vitor Cipriano de Fazio and Bruno Martinelli, from SMIT, confirmed that this mapping has been referred to when

thinking about new pilot projects.[220] The Secretariat states having successfully mobilized and interacted with technology and innovation civil society groups, mainly through the activities in the Pátio Digital and Mobilab. In the IRM researcher's view, those growing interactions are promising, but insufficient to validate or provide clear evidence that a "public network" is being created, even if informally. Nonetheless, if interactions are sustained and increase in frequency, such a network of civil society groups with expertise in innovation and technology (as envisioned in the first milestone), could come to fruition in the coming years[221].

The government transferred implementation of the second and third milestones, which refer to creating spaces for co-working and developing joint projects with those identified groups, to SMIT when the commitment was reformulated. Based on the agreed commitment text and the activities that were carried out during the implementation period, the IRM researcher found encouraging, yet still limited, signs of the creation or consolidation of the diverse set of spaces and joint projects, not all directly resulting from the commitment's planned activities.

Civil servants at SMIT pointed out that the labs under their purview[222] were testing out, in 2017, new models of collaboration with external stakeholders (in both civil society and the private sector). These models were based on shorter "visiting schemes" rather than co-working or residencies, for instance in the case of the Residência Maker initiative. Another example of such labs can be found in Mobilab (a joint venture between the Secretariat of Transport and SMIT).

On the other hand, in the case of Pátio Digital (hosted by the Education Secretariat), considered a highly successful innovation hub,[223] collaboration took place in a series of formats different from the co-working space. The formats range from open application challenges and open subcontracting to dialogues with the school community. LabProdam, a project led by PRODAM, is perceived as the least developed initiative, due to changes in PRODAM's leadership and project management in early 2017.

As for the joint projects specified in the commitment language to promote the use of free open source tools, both civil servants and external stakeholders identify promising initiatives. They include Pátio Digital's Café Hackers on open public procurement, the Open Education Initiative, the Open Meal initiative, and the Mapatona on school transportation. Also included are virtual consultations on education-related matters, such as uniforms and school meals, and a range of other open data projects.[224] Informants attribute these achievements to the Education Secretariat having achieved a virtuous path of its own due to committed senior leadership in the secretariat and highly engaged technical civil servants.[225] Those informants do not perceive the Pátio's achievements as sufficiently linked to the remaining OGP-related activities led by *São Paulo Aberta and* the Forum. Informants also resent the little coordination between those processes during this pilot action plan. Alternatively, representatives from SMIT believe the Secretariat and the OGP Commitment had a catalyzing role to the Pátio and the Education Secretariat[226].

Lastly, as for the commitment's final goal of networked action from labs and hubs , civil servants from SMIT confirm the secretariat is currently studying new options based on models of "network governance for innovation." These models are less institutionally or legally formalized. As with the remaining milestones, Forum members believe this ongoing reflection, within SMIT, on possible networked innovation governance has yet to be shared with the OGP Forum.

Early results: did it open government?
Civic participation: Marginal

The government integrated this commitment partially into the overall shared management of São Paulo's OGP action plan. In June 2017, the government renegotiated the commitment language, redefined the leading department, and established a new focus. These efforts did not set a clear division of roles between both leading governmental agencies, SMRI and SMIT. Consequently, on both sides, there was no ownership, and there were appropriation challenges. The Shared Management Forum rarely discussed Commitment 5 in general meetings. Both São Paulo Aberta and civil society organizations monitoring plan implementation had little or no information on the status of the commitment, except for tangential information on MobiLab and Pátio Digital. This information came from external information sources and from parallel activities not always related to those agreed on in the OGP action plan[227].

Consequently, the IRM researcher did find evidence, albeit incipient, of a strong effort to create an inter-secretarial network, in partnership with civil society and change the way the government creates or improves opportunities and capacities for the public to inform or influence decisions on innovative solutions to city problems. Taking into account the diverging perceptions of governmental and non-governmental actors involved in the implementation of this commitment's activities or monitoring the open government agenda in the city, the IRM researcher believes the most consolidated and promising initiatives, for instance those found in Education, do not exhaust the commitment's aim to integrate the variety of groups identified in the initial mapping and make them part of municipal innovation, through co-creation of policy solutions in a range of sectorial policies. Open government results are thus, marginal in this first year, with potential greater impact in the future, as initiatives consolidate and grow in scale.

From the perspective of OGP core values, Pátio Digital's promising results on the use of technology and innovation tools for expanding civic participation in educational policies serve as foundational steps in creating a citizen-focused technological innovation culture in the city. The government should leverage these efforts in the coming year. It could use the initiative as a study case in the Open INFO Network (see Commitment 4: Institutionalization). It could also use the initiative as a central node of the emerging network of laboratories and innovation hubs sought for in Commitment 5.

Recommendations

To move this commitment's intended reforms forward, the following recommendations could be considered by the São Paulo government:

1. Create more opportunities for other secretariats to learn from the Pátio Digital experience. This learning should apply to both those secretariats currently hosting labs and hubs as well as those who have showed interest in doing so. This can be done, for instance, under the exchange and capacity-development activities promoted by the Open INFO Network (see Commitment 4: Institutionalization).
2. Set up a new round of reflections on how São Paulo Aberta and the Shared Management Forum can be more closely involved with the emerging innovation network led by the Secretariat for Innovation and Technology. Their expertise on open government can be valuable to the ongoing reflections on how to boost citizen-focused open innovation.
3. Considering the priority given to innovation and technology by the current administration, include some of the emerging sectorial pilot open technology initiatives, mostly for service delivery, in future OGP action plans. Also ensure that those implementing them can engage in

OGP to exchange and collaborate with other subnational entities.

[213] The full original text, approved in 2016, reads: "Improve the Innovation Technology Laboratory (LabProdam), turning the lab more open, mapping groups already working on free technology, such as youth groups, startups and collectives to create projects similar to São Paulo's Urban Mobility Laboratory (MobiLab). 1. Conduct a collaborative mapping of the existing groups working on open technology and innovation and create a public network with interested entities in becoming LabProdam partners. 2. Turn LabProdam into a coworking space, where young people, startups and collectives can develop projects in a collaborative format, having as a frame of reference the Laboratory for urban mobility solutions of São Paulo (MobiLab). 3.Develop projects in partnership with these groups in order to encourage social participation, transparency and/or integrity by means of technology innovation, using free open tools".

[214] According to civil servants from the Municipal Secretariat for Innovation and Technology (SMIT) the growth of the City Hall has resulted in the creation of the SMIT, the approval of the Strategic Plan of Technology Information and Communication - PETIC and the launch of the *Digital Patio* (Pátio Digital), within the Education Secretariat (SME). The inputs where provided by SMIT during the IRM report review, in May 2018.

[215] Interview with Fernanda Campanucci, civil servant (15 May 2017).

[216] Focus group with São Paulo Aberta and CGM civil servants (4 May 2017), focus group with CSOs of the Shared Management Forum (18 May 2017), and interview with Vitor Cipriano de Fazio and Bruno Martinelli from SMIT (1 September 2017).

[217] Input provided by SMIT during the IRM report review, in May 2018. About the Residência Maker initiative, see call for proposals, published in January 2018, at http://www.prefeitura.sp.gov.br/cidade/secretarias/inovacao/noticias/?p=248166

[218] See "Minutes of the XI Forum Meeting (08/06/2017)," to which the IRM researcher had access.

[219] The collaborative mapping can be found at https://drive.google.com/drive/folders/0B91yVgdvPA9-cGVGLXlFcXhUQVk.

[220] Interview with Vitor Cipriano de Fazio and Bruno Martinelli from SMIT (1 September 2017).

[221] Interview with Joara Marchezini and Caroline Burle from RETPS (21 November 2017), interview with Renata Galf from Transparência Brasil (14 November 2017), and interview with Haydee Svab from Transparência Hacker (23 November 2017).

[222] According to the Inter-secretarial Administrative Act (*portaria intersecretarial*) No. 001/2017, between both SMIT and SMT.

[223] Interview with Haydee Svab (23 November 2017), interview with Vitor Cipriano de Fazio and Bruno Martinelli from SMIT (1 September 2017), and interview with José Adão from PIDS (15 November 2017).

[224] For a comprehensive list of all initiatives, see http://patiodigital.prefeitura.sp.gov.br/.

[225] Interview with Vitor Cipriano de Fazio and Bruno Martinelli from SMIT (1 September 2017), and interview with Haydee Svab from Transparência Hacker (23 November 2017).

[226] Input provided by SMIT during the IRM report review, in May 2018.

[227] Interview with Ana Dienstmann (07 August 2017), interview with Eduardo Barboza (07 August 2017), interview with Ana Dienstmann and Eduardo dos Anjos Barboza, civil servants from São Paulo Aberta/SMRI (01 December 2017), interview with Haydee Svab from Transparência Hacker (23 November 2017), interview with Joara Marchezini and Caroline Burle from RETPS (21 November 2017).

Method and Sources

The IRM report is written by well-respected governance researchers. All IRM reports undergo a process of quality control to ensure the highest standards of research and due diligence have been applied.

Analysis of progress on OGP action plans is a combination of interviews, desk research, and feedback from nongovernmental stakeholder meetings. The IRM report builds on assessments of progress put out by civil society, the government, the private sector, or international organizations.

The first and primary objective of the IRM is to verify completion of action plan commitments and the level of participation. Beyond this, the IRM seeks to assess potential impact and early changes in behavior around open government. There are two intended outcomes: accountability and learning. The method follows these aims. A second, important function of the IRM is to act as a "listening post" for the concerns of civil society.

Each report undergoes a four-step review and quality control process:

- Staff review: IRM staff reviews the report for grammar, readability, content, and adherence to IRM methodology.
- International Experts Panel (IEP) review: IEP reviews the content of the report for rigorous evidence to support findings, evaluates the extent to which the action plan applies OGP values, and provides technical recommendations for improving the implementation of commitments and realization of OGP values through the action plan as a whole.
- Pre-publication review: Government and select civil society organizations (at the discretion of the researcher) are invited to provide comments on content of the draft IRM report.
- Public comment period: The public is invited to provide comments on the content of the draft IRM report.

Interviews and Focus Groups

Each IRM researcher is required to hold at least one public information-gathering event. Care should be taken in inviting stakeholders outside of the "usual suspects" list of invitees already participating in existing processes. Supplementary means may be needed to gather the inputs of stakeholders in a more meaningful way (e.g., online surveys, written responses, follow-up interviews). Additionally, researchers perform specific interviews with responsible agencies when the commitments require more information than provided in the self-assessment or is accessible online. If IRM researchers wish to substitute a stakeholder meeting with another format, they should communicate this to IRM staff.

The IRM researcher conducted 23 interviews and informal consultations with relevant stakeholders in government and civil society between May and December 2017. Interviews were conducted both in person and via telephone. In addition, the IRM researcher also hosted two focus groups on the action plan elaboration in May 2017. The researcher also attended and observed 11 OGP-related meetings in São Paulo between April and August 2017. The full list of informants consulted—clustered into "government representatives" and civil "society representatives"—and events attended by the IRM researcher can be found in the "São Paulo_ IRM Repository of Evidences" folder, available at https://goo.gl/EjVKM9 .

Document Library

The IRM will use a publicly accessible Google (or equivalent) library. The IRM team will create a page for each entity and send the researcher detailed instructions for how to upload important documents used in their research. Then, the researchers will be able to use those website permalinks in the text of their reports.

Documents to be found in the document library include (i) copies of official documents and reports on OGP action-plan-related activities, (ii) print screens of official websites used as evidence to assess milestones' completion, (iii) OGP-related event's flyers and invitations, retrieved from social media, and (iv) online copies of relevant official publications related to open government in São Paulo.