

# Challenges and potentialities for implementing social protection responses to emergency through decentralized administration

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Lessons from Brazil's  
*Auxílio Emergencial*

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# List of acronyms

**AE** – Auxílio Emergencial

**AER** – Auxílio Emergencial Residual

**BPC** – Benefício Prestação Continuada  
(Continuous Provision Benefit)

**CCT** – Conditional Cash Transfer

**CEAS** – Conselho Estadual de Assistência Social (State Social Assistance Council)

**CGU** – Controladoria Geral da União  
(Union General Comptroller)

**CIT** – Comissão Intergestores Tripartite  
(Tripartite Intermanagerial Commission)

**CMAS** – Conselho Municipal de Assistência Social (Municipal Social Assistance Council)

**CMC** – Crisis Management Committee

**CNAS** – Conselho Nacional de Assistência Social (National Council of Social Assistance)

**CNIS** – Cadastro Nacional de Informações Sociais (National Registry of Social Information)

**Congemas** – Colegiado Nacional de Secretários (as) Municipais de Assistência Social (National Collegiate of Municipal Social Assistance Managers)

**CRAS** – Centro de Referência da Assistência Social (Social Assistance Reference Centers)

**CREAS** – Centro de Referência Especializado da Assistência Social (Special Social Assistance Reference Centers)

**DPU** – Defensoria Pública da União (Union Public Defenders)

**FNAS** – Fundo Nacional da Assistência Social (National Social Assistance Fund)

**Fonseas** – Fórum Nacional de Secretários (as) de Estado da Assistência Social (National Forum of State Secretaries of Social Assistance)

**GPTE** – Grupos Populacionais Tradicionais e Específicos (Traditional and Specific Populations and Groups)

**ICT** – Information and Communication Technology

**IGD** – Índice de Gestão Descentralizada (Decentralized Management Index)

**LDO** – Lei de Diretrizes Orçamentárias (Budget Guidelines Law)

**LOA** – Lei Orçamentária Anual (Annual Budget Law)

**MC** – Ministério da Cidadania (Ministry of Citizenship)

**MDS** – Ministério do Desenvolvimento Social (Ministry of Social Development)

**PBF** – Programa Bolsa Família (Bolsa Família Program)

**PCF** – Programa Criança Feliz (Happy Child Program)

**PPA** – Plano Plurianual (Multi-Year Plan)

**SCFV** – Serviço de Convivência e Fortalecimento de Vínculos

**SUAS** – Sistema Único de Assistência Social (Unified Social Assistance System)

**TCU** – Tribunal de Contas da União (Federal Court of Auditors)

# Executive Summary

## Conceptual framework

**Identifying the most appropriate administrative level for each social protection function is key to improving the social protection governance framework.** This largely depends on the extent to which such functions are best delivered by each administrative government. Classic decentralization options range from deconcentration (the central government is directly or mostly in charge of functions performed at lower administrative levels) to delegation (functions are transferred to subnational governments with some autonomy, but yet under oversight and some financial dependency of the central government) and devolution (subnational governments enjoy full autonomy, financial as well, over its social protection functions, including on matters such as sectoral plans and strategies).

**Brazil delegates social assistance services to subnational governments through a participatory, inter-federative system: the Unified Social Assistance System (SUAS).** This system gives subnational governments voice over strategic decisions and additional funds in exchange of their support to flagship national programs, adhesion to basic protocols, and delivery of a minimum basket of services. Given Brazil's territorial diversity, it is unlikely that an entirely centralized social assistance service would function. Hence, the incentives offered by SUAS is necessary as the central government has no power to rule on how subnational governments are to deliver their own social assistance services nor on how they are to support national initiatives. Furthermore, such a model remains a better alternative to fully localized provision of social assistance tout court, which would result in heterogenous treatment across geographic spaces.

## Auxílio Emergencial and its unique implementation model

**Auxílio Emergencial (AE) was launched in April 2020 to protect both the chronic and transient poor affected by the COVID-19 pandemic, limited to those not already covered by other social protection transfers.** By its volume of resources, coverage, generosity, timeliness, and impacts on income and poverty, it features as one of the soundest social protection responses across the globe to COVID-19. During its operation, AE has been gradually reducing its generosity in terms of benefit values, eligibility rules and protocols, and the resulting population coverage. A separate policy note describes these features in detail (World Bank 2021a).

**A key feature of AE was its intent to provide generous cash benefits to those without prior coverage of social benefits and whose incomes were at risk from crises resulting from lockdowns and the pandemic.** Those who fell in poverty as a result of the pandemic (the so-called 'new poor') were enrolled through an app-based tool feeding a temporary registry specifically set to AE (the ExtraCad). In addition, AE was also automatically distributed in lieu of Programa Bolsa Família (PBF) whenever this proved more advantageous to the beneficiaries. Those eligible to AE and previously registered in Cadastro Único (Single Registry), even if not beneficiaries of PBF, were also automatically selected.

**AE was conceived as a temporary cash transfer meant to last a few months, but it gradually expanded and eventually lasting for a total of 16 months.** AE program was mandated by congressional legislation, conceived and rolled up quickly, operational for only 14 days following the President's first mention of its concept. When initially conceived, it was not clear that AE would be repeated over two more rounds: AE1 took place between April and August 2020; AE2 between September and December 2020; and AE3 between April and October 2021. Each time, attention to refining targeting and cost-efficiency increased.

**AE was coordinated by the Ministry of Citizenship (MC), with CAIXA and Dataprev as key implementing partners.** The MC was responsible for leading the program and overseeing all its aspects. CAIXA is the traditional partner of the MC in the operation of conditional cash transfers (CCTs) and for the payment of many other social protection programs in the federal government, and it was responsible for such functions in AE as well. Dataprev is a state-owned company that runs the information system of the social insurance programs of Brazil and was responsible for running the selection process of AE, which was 100 percent based on the analysis of administrative registries.

**In addition to these three main players, AE implementation relied on an unusually large number of institutional actors at the central government level, but with no formal participation of subnational governments.** Likely due to its exceptional coverage and generosity, many more institutional actors than usual participated in the execution of the cash transfer program, such as in error and fraud control (audit and comptroller bodies) and to correct errors of exclusion (the judiciary). At some point, even the country's courier service (the Correios) was involved as an attempt to mitigate exclusion errors due to digital exclusion. Subnational governments, however, were not provided with any specific responsibility to support the implementation of AE. Some of the functions normally performed by Brazil's social assistance network (SUAS) were either digitalized or attributed to other federal actors.

**A principal explanation for not engaging SUAS in AE points to the uncertainty about its capacity to continue operating in the pandemic given the face-to-face nature of its services and the impediments due to social isolation.** During the conception of AE, the public sector was entering complete lockdown and SUAS too had halted its principal customer-facing operations, such as supporting families to comply with *Bolsa Família* conditionalities and the mandatory update of beneficiary information in Single Registry. Relying on SUAS to uniquely register millions of new beneficiaries at that time was probably unrealistic. Second, the participatory nature of SUAS might have further challenged the timeliness of decisions to define the terms under which SUAS could take part in AE's operation (especially if considering that AE was conceived and became operational in less than 2 weeks).

**However, SUAS's front-end services seem to have quickly adapted to the social isolation measures and normalized its operation soon after AE was first rolled out.** SUAS has quickly resumed functions, for instance, updating the records of customers who wished to (even if not on a mandatory basis). It has adapted to undertake several other in-person and remote tasks, similar to what it could have provided had it been a part of AE.

## Legacy contribution of Brazil's Unified Social Assistance System to AE

**Despite not formally being a member of AE's operation, SUAS has nevertheless contributed to the program through its legacy that made Cadastro Único (Single Registry) a sound and trustful social registry from where almost half of AE's beneficiaries were selected.**

Being the core feeder of Brazil's Single Registry, SUAS has contributed to the good quality of this registry that served as the entry channel for almost half of AE's beneficiaries.

**Interviews with program managers suggest that the selection process based on Single Registry was probably more accurate than that based on the temporary registry fed by an app (the ExtraCad).** Key to that belief is the fact that Single Registry tracks the family composition of its registered individuals, whereas no other administrative registry available for AE selection process had access to this information, thus subjecting the selection process of the ExtraCad public to risk of benefiting more than the capped number of individuals per household in case applicants did not accurately report their family composition. Furthermore, Single Registry is also believed to provide more reliable information since it requires periodic and face-to-face update.

**SUAS-fed Single Registry also enabled a timelier enrollment of beneficiaries, with virtually all the eligible persons of this registry having their enrollment to AE automatically processed in the first month of the program's operation.** The minority of beneficiaries selected from Single Registry who took longer to gain access to the program relate mostly to persons whose access resulted from judicial decisions or whose eligibility situation was not explicitly covered by the program's legal framework and therefore it had to wait for the ex-post definition of selection protocols for such cases. In contrast to that, 46 percent of beneficiaries that gained access to AE via the app (the ExtraCad public) took longer than one month to do so (in most cases because they took long to apply).

**Single Registry active search efforts to register Traditional and Specific Populations and Groups (Grupos Populacionais Tradicionais e Específicos, GPTEs) have mitigated AE's exclusion errors due to its lack of a dedicated active search campaign for such groups.** SUAS-led active search campaign to register GPTEs (such as indigenous, maroons, and other extremely vulnerable groups that commonly struggle to gain access to social services) started in 2011 and has, since then, increased their participation in Single Registry over twelvefold, currently reaching a total of over 3 million such families (around 9 million individuals). Overall, 87 percent of GPTE families previously registered in Single Registry turned out to have at least one of their members benefiting from AE.

## Challenges due to AE's fully centralized operation

**The AE design implicitly assumed that the most vulnerable persons were largely included in Cadastro Único (Single Registry).** To provide AE to the chronic poor, AE relied on the information contained in Single Registry records of April 2, 2020, and assumed that the 'new poor' could participate in AE through digital registration. However, at the time of the pandemic, *Bolsa Família* had a large waiting list and the unavailability of the benefit may have discouraged many from applying or reinstating expired applications. Applications for those outside Single Registry required at a minimum an individual mobile phone, tax identification number, and some sufficient literacy skills to answer questions in the app. By December 2019, 21 percent of Brazilians were estimated to lack access to internet, with this number going as high as 40 percent if considering specific access via smartphone. Except for an attempt to process assisted application in partnership with Brazil's courier service (*Correios*)—that did not see an expressive take-up rate—the digitally excluded were not offered channels to file in-person application. And this remained the case even after SUAS resumed operation and could arguably have supported mitigating this shortcoming. Also, SUAS's specific capacity of 'active search' for vulnerable groups not yet registered in Single Registry was not harnessed. Formal customer service was also limited, offered via mobile forms or call centers.

**As the focus to combatting error and fraud increased when moving from AE1 to AE2–3, the risk of excluding families has also grown in the absence of representatives of subnational governments in the governance body that oversaw AE.** According to interviews for this study, reliance on growing number of databases to curb inclusion errors occurred in part at the expense of increased risks of exclusion errors; a large amount of judicial recourses, including through the ‘public defender’ offices followed. In the context of PBF, for instance, such judicial recourses in ordinary times are prevented by the early involvement of client-facing officers of SUAS.

**Despite not formally being a member of AE, SUAS has nevertheless provided important informal support to the initiative, largely by promoting its rules and fostering demand.**

This likely helped prevent further exclusion errors. In many states and municipalities, social assistance centers led local efforts to activate demand for the program and by instructing people about means to file applications or complaints in case of contestable denials to the benefit. In fact, several SUAS offices collaborated with Union Public Defenders (*Defensoria Pública da União*, DPU) to stimulate the population file extrajudicial contestations and by instructing them on the appropriate documentation required in each case. There are even reports about localized campaigns to ‘trick the app-based rules’, by instructing community members how to share mobile phones and switch SIM cards for filling applications on behalf of those who do not have their own. Important actions of the MC that enabled the informal support provided by SUAS included tailored communication material to be distributed by social assistance workers among their communities. Furthermore, the MC decided to maintain SUAS funding under IGD<sup>1</sup> -Bolsa (a performance-based remuneration in appreciation of SUAS support to *Bolsa Família*), even though SUAS activities related to *Bolsa Família* were halted during the pandemic.

## Complementary decentralization measures of the social protection sector during the COVID-19 pandemic

**Despite SUAS’s limited role in AE, the system has played a major role in enabling other forms of response to the crisis and ensuring the continuity of services and programs that both complement the support provided by AE and reach out to persons enduring other forms of vulnerability not covered by AE.** A first set of relevant measures contributing to the decentralization of social assistance during the pandemic aimed at ensuring SUAS could continue some of its key functions. Over and above maintaining the continuity of important regular services provided by SUAS, it has also operationalized the so-called occasional services (that is, activities that are not part of SUAS’s regular basic service basket, but which were deployed with different durations and under special regimes, as a response to the pandemic).

**SUAS has received large and extraordinary budgets, mostly to support its role in food distribution programs rolled out during the pandemic.** Beyond that, SUAS was also excused from strictly adhering to regular planning instruments, such as PPA<sup>2</sup>, LDO<sup>3</sup>, and LOA<sup>4</sup>.

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1 IGD = Decentralized Management Index.

2 The Multi-Year Plan (*Plano Plurianual*, PPA) is a government planning policy instrument that defines the guidelines, objectives, and goals of the federal public administration for a four-year horizon.

3 The Budget Guidelines Law (*Lei de Diretrizes Orçamentárias*, LDO) is an annual law whose goal is to identify the government’s priorities for the coming year. It guides the elaboration of the Annual Budget Law (*Lei Orçamentária Anual*, LOA), based on what was established by PPA.

4 The Annual Budget Law (*Lei Orçamentária Anual*, LOA) establishes the government budget for the coming year. It is divided into policy areas—such as health, education, and transport.

Furthermore, Municipal Social Assistance Committees (*Conselhos Municipais de Assistência Social*, CMAS) were offered simplified alternatives for reprogramming their budgets and the option to comply with a simplified accountability routine provided all proofs of disbursements are kept for potential auditing in the future.

## Lessons learned for emergency responses in the future

**It is important that the legacy of historical efforts in feeding and updating Single Registry is not taken for granted under the assumption that temporary and ad hoc registries could be a suitable substitute of this tool.** The Single Registry enabled the fastest enrollment channel of AE and probably enabled the reach out to the most vulnerable population who would otherwise struggle to gain access via the app-based channel. It is therefore concerning that the update of Sing Registry has not been mandatory since the beginning of the pandemic and the main program that stimulates people to do so, the PBF, has been halted. Unless the routine feeding and updating process of Singe Registry does not resume soon, this important instrument might become severely compromised, with immediate effects to the operability of core social protection functions of the country.

**For the future, standard operation procedures can define minimum functions that SUAS should perform in the event of new emergency programs.** Simplified decision-making processes could also be defined in advance, which allow to quickly negotiate the terms of SUAS involvement in emergency programs in the future. Identification of sources to finance these additional responsibilities, ex ante, may be relevant too.

**The use of centralized and IT-enabled systems in support of social protection processes can be complementary, rather than a substitute, of local governments' engagement.** As illustrated by AE, the lack of in-person channels for assisted application may expose programs to exclusion biases due to the still large rates of digital exclusion in the country. Furthermore, the administrative registries of the country still have much to improve and might lead to selection errors that could otherwise be avoided if this includes face-to-face meetings for accessing documentation and validating at least some of the declared information (for instance, the family composition).

**Although AE has pioneered some interesting setups to address exclusion errors, these solutions lacked scale as they could only count on the support of organs related to the central government, such as DPU and Correios.** The extrajudicial contestation mechanism of AE was a novelty since traditional programs such as PBF did not have similar possibilities. However, such responsibilities were concentrated in a central government organ, DPU, which has no scale to process the demand, thus limiting the efficiency of the solution while also exposing the program to large costs due to a surge of litigations. In the case of the assisted application by Correios, the solution could probably have had a higher take-up rate had it been rolled out sooner and, mostly, if it had been provided by an organ most known by the population for managing social protection related matters.

# 1. Introduction

**With the advent of COVID-19, Brazil has come out with one of the fastest and most generous social protection responses globally: the *Auxílio Emergencial* (AE) (Gentilini, Almenfi, and Dale 2020; Beazley, Marzi, and Steller 2021).** This consisted of a cash transfer program for the chronic and transient poor not covered by other safety nets, social insurance, or labor scheme. Originally launched in April 2020 and meant to last only a few months, the initiative had its mandate extended over three phases that lasted 16 months up until October 2021 (GoB, CGU 2021; GoB, Min. Cidadania 2021g, 2021h; Lara Ibarra 2021a; Bartholo et al. 2020; Yamasaki and Rodopoulos 2021). Being the stronghold of the country's responses to the pandemic-triggered crisis, even AE's least generous phase is still expected to have improved the national average income and decreased the national poverty prevalence compared to the immediate pre-pandemic figures (Lara Ibarra 2021b).

**AE's operation is in contrast to that of regular social protection programs due to its highly centralized setup with limited formal involvement of subnational governments.** Albeit engaging more actors than those formally involved in flagship social programs, AE had no formal involvement of subnational governments. Therefore, this analysis aims at understanding some core reasons why this happened and what were the main implications of this centralized operation to the program. The text also describes measures that were enacted to mitigate challenges due to the exclusion of subnational governments from the operation of AE and discusses the extent to which these could integrate traditional decentralization mechanisms of regular programs in the future and further improve the sectoral case management capacity at large.

**This paper is structured in seven chapters.** Following this introduction, Chapter 2 presents a conceptual framework describing main forms of decentralization and discussing their adequacy to different contexts and traditional functions of the social protection sector. This includes a brief characterization of Brazil's regular mechanism for decentralization of social assistance services. Chapter 3 presents an overview of AE highlighting its centralized setup and already discussing some main reasons why traditional decentralization mechanisms, such as the Unified Social Assistance System (SUAS), were not formal members of the program. Chapter 4 discusses legacies of SUAS historical support to social protection in Brazil and how these have contributed to AE even if the system was not formally involved in the program. A particular emphasis is given to SUAS's role in feeding and updating Single Registry, which served as the entry channel for almost half of AE's beneficiaries, including the most vulnerable ones who would otherwise be subjected to barriers of access if they had to rely on only the app designed for the remaining population. Chapter 5 describes some main challenges faced by AE and that could arguably have been mitigated had SUAS and/or other subnational governments been part of its formal operation. The chapter also highlights some informal supports that SUAS provided to the initiative, briefly discussing the enablers and limitations of such kind of informal support. Chapter 6, in turn, considers how SUAS and decentralized forms of social protection were nevertheless relevant as complementary measures to that provided by AE.

**Finally, chapter 7 concludes by summarizing some core lessons learned for engaging decentralized mechanisms in emergency responses in the future.** Key takeaways include the remark that legacy contributions from decentralized mechanisms should not be taken for granted when considering the success of AE. Hence, the chapter suggests that traditional decentralized social protection services and functions halted due to AE should resume soon to keep these capacities in good shape. Furthermore, the chapter argues that predefined standard operation procedures should be set in place to prevent the recurrence of reasons that prohibited the formal involvement of decentralized mechanisms in AE in case the country needs to deploy new emergency responses in the future.

## 2. Conceptual framework and Brazil's social assistance decentralization model

**Governance refers to the broad and cross-cutting set of factors, multiple actors, and practices mediating the exercise of power and the administration of public affairs (Bevir 2012).** In the context of social protection, this brings efficiency gains, promotes the realization of human rights, and might even increase the sector's funding availability (Transform 2017; UNDESA and ILO 2021). Complex operational chains and processes, especially those involving institutions and related to the exercise of state power and/or the administration of public affairs, result from a set of coordinated efforts largely captured under the concept of governance. As highlighted by UNDESA and ILO (2021) in a recent global report on governance and social protection, the definitions of governance are necessarily polysemous since it ought to change depending on the different contexts and goals to which it serves. Yet, through its different definitions and uses, the term often encompasses incentives and accountability structures cutting across traditions, culture, institutional environment, norms, values, and overall rules of the game that promote coordination within players of one or more sectors. Reverberating a perception expressed by most development players and stakeholders, the report highlights that good governance of social protection systems is one of the preconditions for the effective realization of human rights and this is also a key driver of overall efficiency of social protection systems as this tends to reduce overlapping and system fragmentation while at the same time fostering synchronicities across multiple initiatives, mechanisms, players, and stakeholders. Based on a cross-country comparison, Baldacci, Hilman, and Kojo (2004) even go as far as to say that countries with best governance systems tend to enjoy higher spending levels.

**Comprehensive social protection governance requires identifying the administrative levels more fit to pursue each function and defining the extent to which each such responsibility should or should not be decentralized to the corresponding government at each level.** Although there is some regularity on the kind of social protection functions often adequate to be pursued at each administrative levels, the decision of whether or not to decentralize these responsibilities to subnational governments is often more context specific. As illustrated in Figure 1, functions such as policy design, budgeting, financing, and backoffice operations are often best pursued at the national level since these are decisions that tend to affect programs and systems in the entire extent of their coverage. In the meanwhile, functions such as provision of oversight and advise for local level, or the provision of complementary programs, might be best operationalized at the regional level wherein one could harvest some gains of scale while still allowing for a more context-specific flexibility. Yet other functions, such as client interface and case management and overall end-to-end core operations (for example, registration and enrollment), might be best implemented at the local level since they require physical proximity to the end user of the program or system and deep knowledge of context-specific local needs ( Samson, Niekerk, and Quene 2006; Transform 2017).

**Figure 1. Typical responsibilities in multilevel administrative system**



Source: Samson, Niekerk, and Quene (2006).

**Upon identifying the administrative level where each social protection function is best fit to take place, social protection initiatives usually have three classic models determining how and to what extent subnational governments are meant to be involved in these processes: deconcentration, delegation, and devolution.** According to Transform (2017), deconcentration refers to setups wherein service is delivered at the subnational level by branches directly administered by the central government, thus granting little to no managerial discretion to local staff involved in these arrangements. Zimbabwe's Department of Social Services is an example of this model with its geographically disperse offices that belong to the Ministry of Labor and Social Services. Delegation, in turn, takes place with the transferring of administrative responsibilities to a structure that is not fully under the control of the central government. It might happen through a statutory and semi-independent agency such as South Africa's Social Security Agency or through local government authorities operating under a common, national framework, as in Brazil's SUAS. Finally, devolution is the most extreme decentralization model in which subnational governments are autonomous for developing and implementing their social protection system without being accountable to national governments nor having to share mandates over sectoral actions. This kind of decentralization model often requires explicit Constitutional provisions as in the case of Ethiopia, wherein states have the power to formulate and execute economic, social, and development policies; strategies; and plans for their territories.

**Being an inter-federative structure, SUAS cannot force subnational governments to adhere to it; therefore, its main strategy consists in offering resources for states and municipalities to buy in.** The strategy has resulted in virtually universal adhesion, and it has the merit of channeling resources through mechanisms that reward best performing governments while also ensuring those with more structural shortcomings get additional resources to catch up with their peers. Federal resources are channeled via the National Social Assistance Fund (FNAS) directly to state- and municipal-level social assistance funds (the so-called fund-to-fund transferences), which are bound to finance social assistance expenditures, including costs of having the CRAS (Social Assistance Reference Centers) and CREAS (Special Social Assistance Reference Centers). Despite many such fund-to-fund transfers being tied to specific allocations, these are not straightjackets as they offer subnational governments a spectrum of possibilities.



## BOX 1.

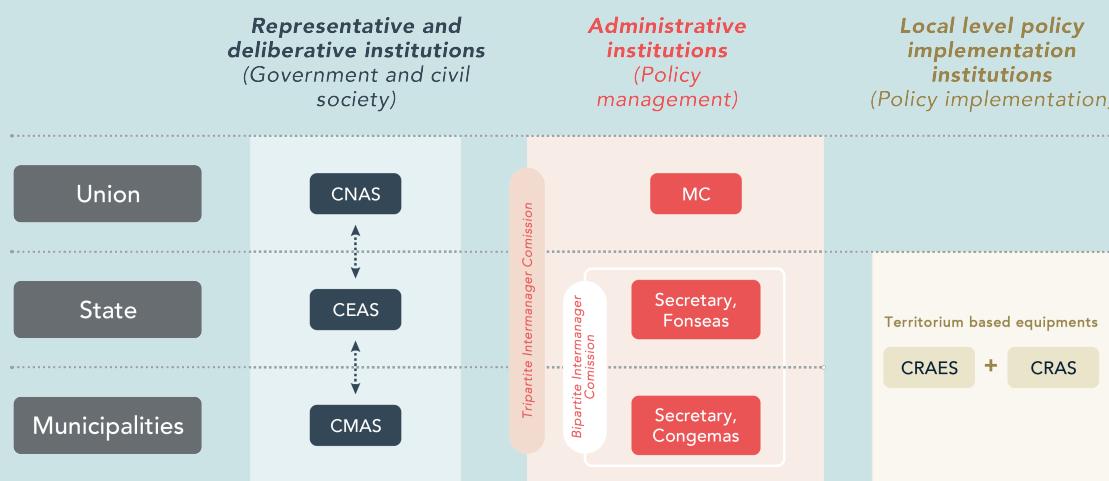
### Key features of Brazil's decentralized social assistance mechanism, SUAS

**Brazil is a three-tier federation composed of the Union (central government); 26 federative units and the federal district (often referred to as states, equivalent to what other countries call provincial governments); and 5,570 municipalities (local level governments).** The country's 1988 Constitution characterizes most social services, including social protection, as concurrent responsibilities, meaning they can be implemented by more than one administrative level of government. Therefore, the central government has no authority to forcefully engage subnational governments to support its social policies. Meanwhile, the central government also has no means to keep operational arms under its direct control across the entire national territory. In this context, the solution found to promote the inter-federative cooperation across all government levels in the delivery of social assistance services included the establishment of a highly participatory social assistance mechanism that benefits from central government funding tied to subnational

governments' compliance to minimum standards in support of cross-cutting, national programs and policies.

**As illustrated in Figure 2, SUAS influences the strategic planning of social assistance policies through a structure of councils at the national, state, and municipal levels,** respectively: the National Council of Social Assistance (*Conselho Nacional de Assistência Social, CNAS*), the State Social Assistance Councils (*Conselhos Estaduais de Assistência Social, CAES*); and the Municipal Social Assistance Councils (*Conselhos Municipais de Assistência Social, CMAS*). These councils influence on matters such as the definition of annual plans, goals, and milestones for the social assistance sector. These councils ought to have a 50-50, shared composition between the government and civil society representatives, with the government at each respective administrative level having discretion to decide how this is to be made.

**Figure 2. Overview of SUAS across the three administrative levels of government and the three dimensions of the policy cycle (deliberation, management, and implementation)**



Source: Author's elaboration.

**In a policy management dimension, SUAS operates through the Tripartite Intermanager Commission (CIT).** The CIT has the Ministry ahead of social assistance as a representative at the central government (which currently is the Ministry of Citizenship, MC), the National Forum of State Secretaries of Social Assistance (*Fórum Nacional*

*de Secretários Estaduais de Assistência Social, Fonseas*) and the National Collegiate of Municipal Social Assistance Managers (*Colegiado Nacional de Secretários Municipais de Assistência Social, Congemas*). Members of the CIT, therefore, have responsibilities such as supporting the adherence of implementing partners to strategies decided by

the social assistance councils or, in the opposite direction, conveying concerns and demands from the implementing partners to these councils. In the Brazilian government system, the Fonseas exerts, within the state level, similar functions to those of a Social Assistance Ministry at the national government. Since there is just one Secretary per state, Fonseas composition is, therefore, rather straightforward as all State Secretaries have a seat to this forum. Congemas, in turn, is composed of elected representatives chosen from accredited social assistance workers of the municipal government (Jaccoud et al. 2020; Jaccoud, Licio, and Leandro 2018).

**At the policy implementation level, SUAS has two main set of apprals: the Social Assistance Reference Centers (CRAS) and the Special Social Assistance Reference Centers (CREAS).** Taken together these apprals provide front-end case management, referral, and overall support to

social assistance initiatives to over 98 percent of the Brazilian municipalities. The CRAS operate at the municipal level and encompass a total of 8.488 facilities throughout the country, being responsible for managing the so-called 'lower complexity cases'—basically alluding to the referral and support in the enrollment for cross-cutting programs to ensure well-being and basic rights (GoB, Min. Cidadania 2021a; Jaccoud et al. 2020). The CREAS, in turn, act both at the municipal and state. There are 2.760 CREAS facilities across the country, mostly located in medium and larger cities. CREAS have a mandate over the so-called 'high complexity cases' that often include tailored assistance to homeless people, orphans, family of incarcerated persons, and other situations that often require more invasive measures, encompassing coordination between the social assistance and the judiciary sector (GoB, Min. Cidadania 2021a; Jaccoud et al. 2020).

Source: Author's elaboration.

One of the core services provided by CRAS, for instance, is the Integral Attention to the Family, which consists in a protocol for visiting vulnerable families, assessing their overall eligibility to social benefits and grants and supporting them in obtaining documentation, and acquiring access to basic services such as school and health and juridical advisory whenever needed. Resources to fund this initiative, for instance, are approved by annual budgets of the central government and channeled to subnational governments via the National Social Assistance Fund (*Fundo Nacional de Assistência Social*, FNAS) (Ibid).

**Another interesting funding source of SUAS, which is embedded on an accountability and capacity building system, is the IGD<sup>5</sup>-Bolsa.** Launched in 2006, this consists of monitoring how subnational governments perform some core functions supporting the feeding and updating of Single Registry and the subsequent operation of *Bolsa Família*. With its resources born out of MC's own budget (since it benefits from SUAS support to both Single Registry and *Programa Bolsa Família* [PBF]), the IGD-Bolsa transfers resources to municipalities according to their individual performances as proxied by an index with the same name and to states according to the average performance of municipalities within their jurisdiction. Interestingly, resources distributed according to the IGD-Bolsa are not tied to specific forms of expenditure. At most, there are prohibited forms of expenditures (for instance, it cannot be used for staff's salaries) and non-binding recommendations about using the resource (GoB, Min. Cidadania 2018, 2021c).

**Building on the success of IGD-Bolsa, SUAS created the IGD-SUAS from 2011 onward to distribute resources for overcoming infrastructural needs of CRAS and CREAS facilities.** The IGD-SUAS draws from the yearly census of the physical condition of all the CRAS and CREAS (the Censo SUAS), proxying their infrastructural shortcomings according to specific indexes of reference and distributing resources to those most in need (GoB, Min. Cidadania 2018, 2021c ).

5 IGD = Decentralized Management Index.



## BOX 2.

### Social assistance service delivery in Brazil before SUAS

**Although front-end social assistance services naturally already existed in Brazil before the establishment of SUAS, this used to take place in a fragmented way with each subnational government running its own programs and structuring its own front-end services without shared standards and adequate cooperation mechanisms.** This had effects, reproducing territorial inequalities across the country; subjecting social assistance to unnecessary risk of elite capture and its use for electoral purposes; and overall deterioration of work conditions of social workers

with undesirable effects to both the efficiency of programs they operated and the overall organized support for social assistance related matters. Furthermore the social assistance framework in Brazil before SUAS was less accountable and transparent and in some instances completely outsourced to nongovernmental organizations without proper regulatory framework and with little to no gains in terms of state's capacity development (Barrientos 2016; Jaccoud and Birchir 2017; Jaccoud et al. 2020; Jaccoud, Licio, and Leandro 2018; Lindert et al. 2007).

*Source: Author's elaboration.*

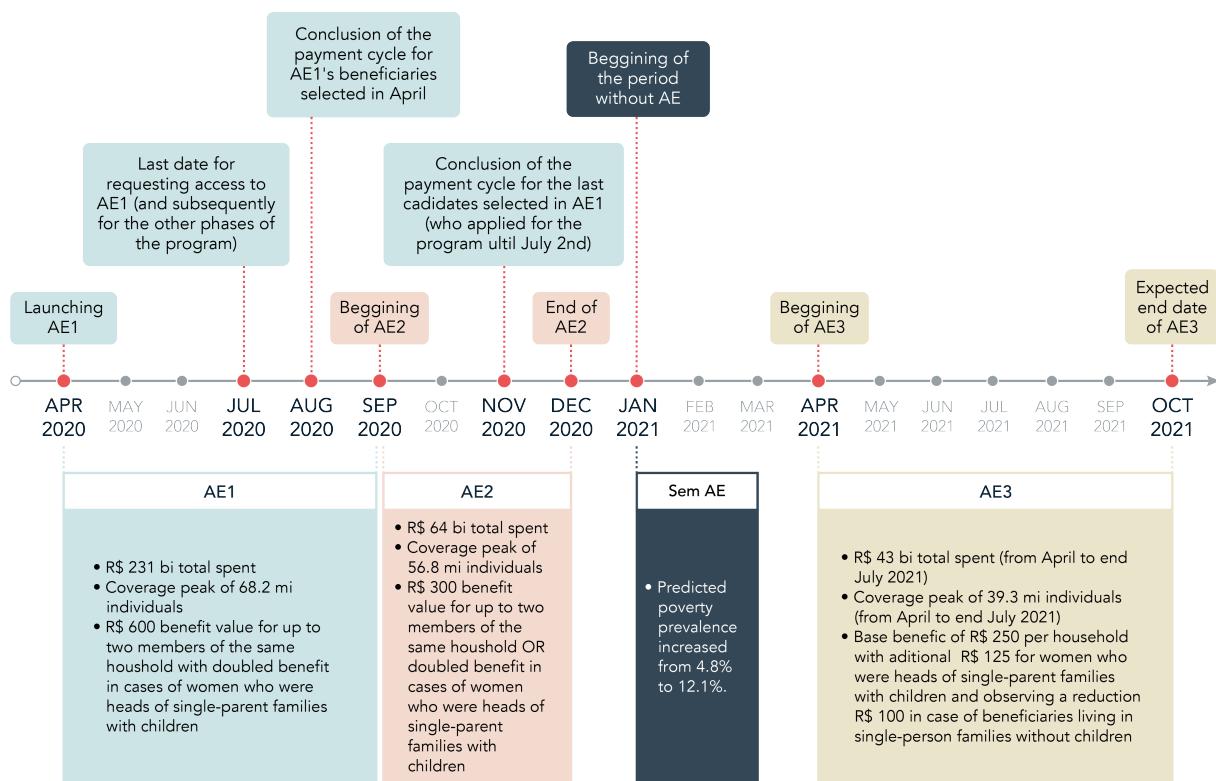
### 3. Auxílio *Emergencial* and its unique implementation model

**With the advent of COVID-19 and its socioeconomic effects, Brazil has come up with one of the fastest and most generous social protection responses of the world: the Auxílio *Emergencial* (AE).** The program features among the most generous social protection responses to COVID-19 (both in terms of horizontal and vertical expansion compared to the main flagship social protection before the pandemic) (Gentilini, Almenfi, and Dale 2020). It was also one of the timeliest responses globally, being operational by April 2, only 27 days after the adoption of the first official social distancing measure and 14 days after the first reference to a program along its lines by the President of the Republic (Beazley, Marzi, and Steller 2021). At its most generous stage, during AE1, the program reached out to 68.3 million direct beneficiaries (and benefited 55.6 percent of the population if also considering indirect beneficiaries) across all the 5,570 municipalities of the country (Freitas and Custódio 2021; Gob, Min. Economia 2020). Its benefit at that stage represented around three times that of *Bolsa Família*; two-thirds of the monthly average income of its beneficiaries in previous years and around 50 percent of the national minimum wage; and half of the average value paid by the contributive, unemployment insurance (Falcao and Morgandi 2020). Its impact is estimated to have increased the national average income and reduced overall poverty prevalence even compared to the immediate precrisis and considering its latest and least generous stages (Cereda, Rubião, and Sousa 2020; Gonzales and Barreira 2020; Gonzales and Oliveira 2021; Lara Ibarra 2021a; 2021b).

**AE's main goal is to extend protection to those affected by the COVID-19 crisis and not covered by other social assistance, social insurance, nor labor schemes.** Despite undergoing many modifications since its inception, AE's core pillars consist of a cash transfer to the chronic and transient poor considering the income thresholds of half minimum wage (R\$522 or U\$99,80) for per capita family income and three times that value for a total family income. Eligibility is limited to persons not covered by social insurance and labor programs nor by other social assistance programs run by the central government. In the case of PBF, beneficiaries started to receive the AE benefit instead of their regular PBF payments whenever this resulted in a more generous value. Despite being an individual benefit, AE had varying caps during its three stages to limit the number of beneficiaries from the same family. The program is set to only benefit adults, although teenager mothers are exceptionally accepted. Female heads of uniparental families with children are also set to receive more generous benefits. The program had three selection streams: (a) the automatic selection of eligible persons from those previously registered in Single Registry, who were already beneficiaries of *Bolsa Família* (that is, the CadÚnico PBF public); (b) the automatic selection of eligible persons from those previously registered in Single Registry, who were not beneficiaries of *Bolsa Família* (the CadÚnico non-PBF public); and (c) the selection among applications filled through a specific app developed for this purpose and that fed a temporary, emergency registry called *Cadastro Extra* or *ExtraCad* (that is, the ExtraCad public) (Bartholo et al. 2020; GoB, CGU 2021; GoB, Min. Cidadania 2021g, 2021h; Lara Ibarra 2021a; World Bank 2021a; Yamasaki and Rodopoulos 2021).

**Given the unknown way through which the COVID-19 crisis unfolded, AE has been extended beyond its originally planned time frame as required by the social crises.** AE was originally meant to last only three months, between April and July 2020, but soon got extended until August 2020. This first phase, which we will hereafter refer to as AE1, was then substituted by a second one, which despite preserving core operational features had undergone significant modifications in its design, including regarding its eligibility rules and its benefit level. Known as Auxílio Emergencial Residual (AER or AE2), this second phase lasted between September and December 2020. Between January and March 2021, the country had discontinued AE, but a spike on poverty prevalence and the surge of new infections and deaths due to COVID-19 had motivated a third phase of the program, formally known as Auxílio Emergencial 2021 (AE2021 or AE3). This third stage had also undergone significant changes in its design compared to AE1 and AE2. It was meant to last until July 2021 but was soon expanded until October 2021 (*Ibid*). Following the end of AE3, PBF was discontinued in the hope that a new program, tentatively referred to as Auxílio Brasil, will replace it with a design more fit to accommodate former AE3 beneficiaries who were not members of PBF but still require continued support due to the pandemic.

**Figure 3. Timeline of the three stages of AE and some of their core characteristics**



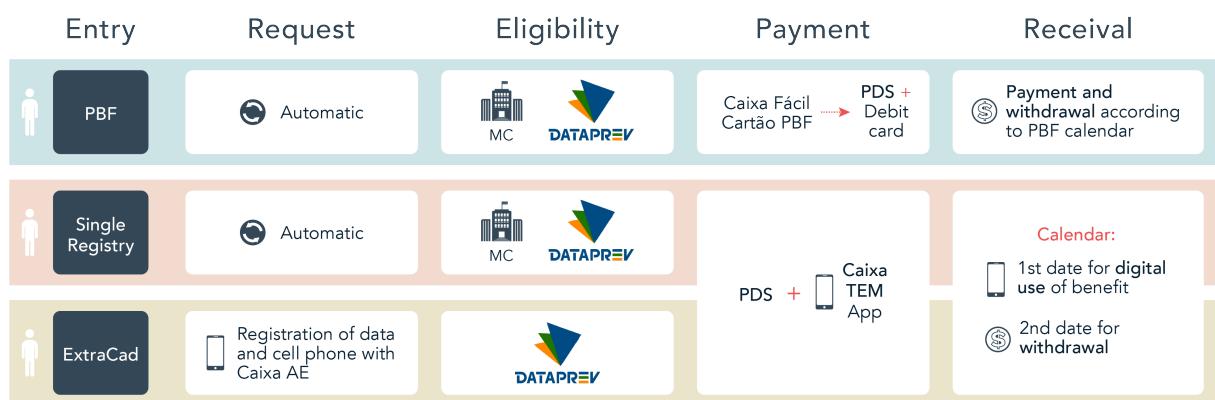
Source: Author's elaboration based on Bartholo et al. 2020; GoB, CGU 2021; GoB, Min. Cidadania 2021g, 2021h; Lara Ibarra 2021a; Valor Econômico / Valor Data 2021; Yamasaki and Rodopoulos 2021).

Note: Payments determined by court decisions might have taken place past the period of reference indicated here for each stage of the program.

**AE was led by the MC with key operational support from CAIXA and Dataprev.** AE was overseen by the ministry in charge of social protection, the MC, which regularly manages flagship programs such as PBF and manages Single Registry (Cadastro Único)—from where

nearly half of the program's beneficiaries were automatically selected. CAIXA is Brazil's public commercial bank with most capillarity, with agencies in nearly all the municipalities, and who historically manages the payment operation for traditional programs such as PBF and provides back-end support to Single Registry. In AE, CAIXA was responsible for running the payment operation and developing and maintaining the app for those not enrolled on Single Registry to file applications to the program, as well as to maintain a temporary registry with the information declared by these applicants, the ExtraCad. Whereas the selection process of PBF was solely based on Single Registry's information and processed directly by the MC and CAIXA, the government has decided that AE would have its full selection process based on validation of multiple administrative registries. Therefore, Dataprev was brought in as an operational partner to the program, capitalizing from its long-dated role and expertise running similar assessments for social insurance and labor programs and starting a new page regarding the cooperation between Brazil's contributory and non-contributory social protection. Dataprev's involvement with AE resulted in a notable expansion of social assistance access to other administrative registries (GoB, Min. Cidadania 2020c, 2020g).

**Figure 4. Key processes of AE and their main stakeholders**



Source: Author's elaboration based on GoB, Min. Cidadania 2020c, 2020g.

**The program has also partnered with other relevant stakeholders at the central government, but it has not formally involved subnational governments nor the inter-federal social assistance structure that traditionally supports social protection programs in Brazil—SUAS.** Other relevant stakeholders in the program's operation included comptroller and accountability organs such as Federal Court of Auditors (TCU) and Union General Comptroller (CGU). Given the unprecedented resources mobilized by AE, these institutions have focused on the initiative, including many assessments and recommendations issued during the operation of the program. Furthermore, these institutions have participated as adviser invitees to the program's Crisis Management Committee (CMC) that met almost every week to continuously improve the targeting of the program. Important partnerships also included organs of the judiciary to manage the surge of administrative and judicial contestations of the program and even a partnership with Brazil's public courier service (Correios) in an attempt to mitigate the lack of channels to file in-person applications to the program (GoB, Min. Cidadania 2020c, 2020g; GoB, TCU 2020). Notably missing, however, was SUAS that traditionally plays a key role as a channel for front-end interface between social protection programs and the vulnerable population. As argued in chapter 5, SUAS's formal involvement in AE could have mitigated important shortcomings that marked the program's operation.

**One of the main reasons why SUAS was not included as a formal implementing partner of AE stems from the central government's uncertainty regarding the continuation of its services due to the social isolation measures.** The very first reference to an emergency program that blossomed into AE can be tracked down to a Presidential speech dated March 18 (Gob, Min. Economia 2021), whereas arguably the key features of the program were decided as part of the fast-tracked, six days legislative approval of its founding law (that is, Law 13982 of March 30, 2020). During that time, the continuity of SUAS's traditional functions was unclear since these involve mostly face-to-face activities that in principle were to be avoided. Ordinance n. 335 of March 20, 2020, for instance, has suspended SUAS's responsibility for supporting families to comply to PBF conditionalities. It has also halted the mandatory update of Single Registry (which in regular times is required for beneficiaries of programs that operate through this registry) (GoB, Min. Cidadania 2020a). By April 1, 2020, just one day before AE became operational, the maintenance of in-person care services was left to be decided by subnational governments at the municipal level with overall guidelines that these should only be continued if social assistance centers had the means to observe basic sanitary measures (such as providing personal protective equipment to staff, ensuring individuals can observe 2 m distance within the premises, and providing means for people to wash their hands periodically) (GoB, Min. Cidadania 2020b).

**It should be noticed, however, that SUAS has expressed its intention to collaborate and soon after the launching of AE1 the institution had managed to adapt its operation and could arguably have integrated AE's operation from thereon.** In April 2020, for instance, SUAS had expressed its interest to remain operational during the pandemic (GoB, CNAS 2020). By April 30, SUAS's Operational Instruction n. 4 has provided an operational framework for disciplining remote services, including remotely updating information on Single Registry via phone or other means, even though these updates remained voluntary as the programs that normally require this have not yet reinstated this obligation (GoB, Min. Cidadania 2020e). Since then SUAS has managed to adapt many of its services to the new sanitary contexts brought by the pandemic, including important roles on food and other in-kind supports provided by the central government. Yet, it never became a formal counterpart to AE (see chapter 7 for a list of measures relating to SUAS's capacity to operate during the pandemic and engaging on efforts to mitigate its effects).

**Arguably, the uncertainty on SUAS services during the pandemic was aggravated by the fact that this would not result from a quick negotiation between the central government and a monolithic institution.** Rather, this would require negotiating with a bottom-up institution that would plausibly take some time and several interactions back and forth for reaching an agreement about the exact terms under which it could participate in the program's operation. Presumably, the more complicated part to establish the terms of its negotiation would revolve around matters such as disagreements on the use of an app and on the establishment of a new, temporary register rather than registering of people in Single Registry as well as matters pertaining to the budgetary provisions for covering additional responsibilities and even matters such as the prioritization of SUAS staff within the vaccination plans (World Bank 2021a).

## 4. Legacy contribution of Brazil's Unified Social Assistance System to AE

**Despite not formally a member of AE's operation, SUAS has nevertheless contributed to the program through its legacy that made Single Registry (*Cadastro Único*) a sound and trustful social registry from where almost half of AE's beneficiaries were selected.**

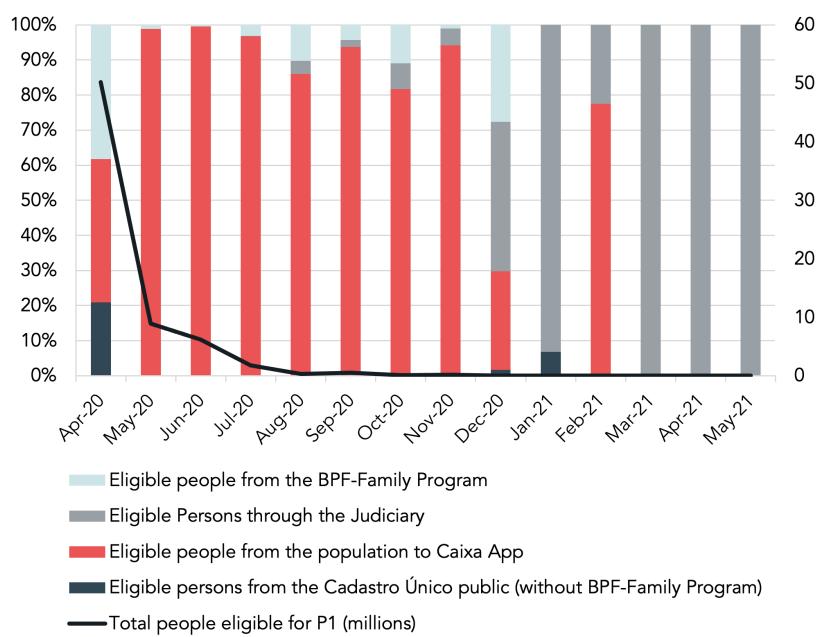
Nearly half of AE's beneficiaries were automatically selected from the pre-existing Single Registry, the main social single registry of the country with information on chronic poor and vulnerable persons with income of up to three minimum wages. AE beneficiaries selected from this registry added much confidence to the efficiency of the program's selection process, since this was the only database available to AE's analysis that enabled the characterization of family links of individual applicants. Furthermore, Single Registry's registration process is traditionally undertaken by SUAS's social assistance workers, who follow strict and standardized protocols that at times even include household visits for validating declared information. Up until the beginning of the pandemic, SUAS staff would also be responsible for undertaking mandatory update of one's information in Single Registry. Although administrative registries of AE are not yet publicly available for undertaking more conclusive efficiency analysis on each entry channel to the program, interviews with program managers have indicated that the selection from Single Registry was probably less subjected to inclusion and exclusion errors than that based on the ExtraCad.

**SUAS-fed Single Registry not only added more confidence to AE's selection process but also enabled a faster rollout of the initiative following its legislative approval.** AE's founding law was passed by the Legislative on March 30, 2020 and enacted by the President on April 2, 2021, with its first payments from April 8 onward. Eligible persons previously enrolled on Single Registry were automatically selected and were the first to be enrolled into AE and to receive its benefit. Among those previously enrolled on Single Registry, there were those who were already beneficiaries of PBF (thereupon designated as the PBF public) and those who were vulnerable but not enough to be eligible to PBF (thereupon designated as the CadÚnico non-PBF public). Both these groups had their eligibility to AE automatically assessed, and they were the first ones enrolled to the emergency program. As illustrated in Figure 5, those eligible to AE1 and previously enrolled on Single Registry have virtually all gained access to AE in the first month of the program, whereas 46 percent of the remaining beneficiaries of AE that required access through a dedicated app took longer to join the program.

**AE has also benefited from the fact that the most vulnerable groups of Brazil had been prior subject of intense outreach and active search campaigns by SUAS and Single Registry, thus mitigating the lack of such specific actions during AE's operation.** The so-called Traditional and Specific Populations and Groups (GPTEs) include 15 vulnerable subgroups. These groups are defined by their ethnic origins (such as indigenous, maroons); their traditional forms of livelihood (related to rural life and deeply linked to natural environments); and circumstantial factors (such as being affected by infrastructure projects and enduring homelessness).

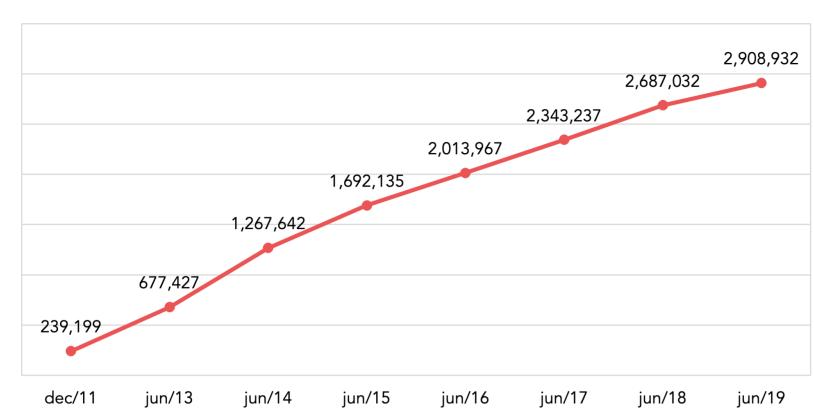
Such groups are particularly vulnerable and, overall, hard to reach, thus requiring active search campaigns to not be systematically excluded from social services and programs. In 2011, the government launched its *Plano Brasil Sem Miséria* to tackle extreme poverty and hunger. The initiative successfully brought Brazil out of FAO's Hunger Map in 2016. Key to that strategy was an active search effort that included training teams for visiting areas where GPTEs not registered in Single Registry were expected to live, therefore enabling their inclusion in this registry and their subsequent enrollment on adequate programs such as PBF and others (Amaral 2014; Direito et al. 2018). As illustrated in Figure 6, the active search efforts initiatives in 2011 have increased over twelvefold the number of GPTEs covered by Single Registry, adding up to over 3 million GPTE families registered in Single Registry by June 2020 (and approximately 9 million individuals). Subsequently, this enabled AE to have a quick and high coverage rate for most of these groups, with 87 percent of GPTEs benefiting from AE (GoB, Min. Cidadania 2021b, 2020i).

**Figure 5. Flow of receipt of the first installment of AE1 (P1), by program's entry stream/channel**



Source: Ministério da Cidadania (2021f).

**Figure 6. Number of GPTE families registered in Single Registry between December 2011 and June 2019**



Source: Ministério da Cidadania (2021b).



### BOX 3.

#### Entangled history of SUAS, Single Registry, and PBF

**SUAS is one of the three landmarks of Brazil's social protection system, along with the country's integrated social registry (Single Registry, Cadastro Único) and its flagship Conditional Cash Transfer - CCT (PBF) to which it is embedded.** In the same year that SUAS was created, in 2004, Brazil also established a dedicated ministry for the social protection sector, the Ministry of Social Development (MDS), which currently goes under the name of the Ministry of Citizenship (MC). In the same year the country also established its core flagship CCT (PBF) that existed up until October 2021. Brazil's integrated social registry, Single Registry, was established in 2001, but before the creation of SUAS and *Bolsa Família* the existing programs that fed this registry had a significantly smaller scale than what it would acquire from 2004 onward. Furthermore, it was only with its use as part of *Bolsa Família*'s operation that Single Registry has undergone a set of improvements that has enabled it to acquire the operational functionality for which it became globally known. Up until 2003, for instance, the

tool would not allow for registration updates. The tool has undergone seven updates between 2003 and 2010, and it was only from thereupon that it started operating directly online (WWP, n.d.). SUAS, in the meanwhile, has emerged as the core system supporting the registration of persons in Single Registry and their subsequent enrollment under *Bolsa Família* as well as many other programs that run their selection processes based on this registry. SUAS also played an important role in disseminating information on *Bolsa Família* to promote demand for the program and to defend the program's legitimacy by explaining its rules and contributing to local forms of accountability and resolution of controversies. Furthermore, SUAS liaised with beneficiaries to support the compliance to PBF conditionalities, either to understand whether this is due to supply issues (in which case they should be exempt from penalties) or to help them comply (Barrientos 2016; Jaccoud et al. 2020; Jaccoud and Birchir 2017; Jaccoud, Licio, and Leandro 2018; Lindert et al. 2007).

Source: Author's elaboration.

# 5. Challenges due to AE's fully centralized operation

**Given AE's enormous challenge of being conceived and operationalized quickly to serve a heterogeneous public, the initiative experienced a few limitations which could potentially have been mitigated had it formally involved subnational actors to its operation.** The four most relevant are listed below.

- 1. The limited supply of in-person registry options for applicants unable to use the smartphone app.** The program has automatically selected beneficiaries previously registered at Cadastro Único (Single Registry), which is targeted at the chronically poor and vulnerable, but not so robust to identify those experiencing transient poverty and vulnerability due to the COVID-19 covariate shock. Hence, AE developed a smartphone app for this public to apply to the program. Despite unfolding promising opportunities, this information and communication technology (ICT) solution was not accompanied by sufficient options for in-person application, therefore exposing the program to risks of digital exclusion, considering 21 percent of the population were estimated not to have access to internet in late 2019, whereas over 40 percent were estimated not to have access to internet via smartphone (CETIC 2020a, 2020b). Although Single Registry has a history of active search to include the most vulnerable persons in its registry (Amaral 2014; Campello and Mello 2014), and digital exclusion is overall correlated with poverty and other forms of vulnerability (CETIC 2020a, 2020b), there has been criticisms to the belief that all digitally excluded persons have been automatically included in AE due to prior enrollment on Single Registry (Bartholo et al. 2020; Blofield and Filguera 2020).
- 2. Actions tailored to GPTEs featured communication campaigns and flexibilization of payment rules, but actual in-person or assisted enrollment was only featured for the last month of the application window, unaccompanied by active search efforts, thus culminating in marginal uptake of the service.** Despite being believed to be largely covered by Single Registry as a reflex of historical active search campaign (Amaral 2014; Campello and Mello 2014), GPTEs have not been the subject of sound active search campaign specifically conceived for AE. Actions tailored to this group included specific program manuals (GoB, Min. Cidadania 2021e, 2020f) and a podcast series (MinCidadania, n.d.), as well as an extension on the time for which their benefits could be kept unused on their account without being returned to the treasury under suspicion of fraud or error (GoB, Pres. da República 2020). In the last month of the program's application window (that is, between June and July 2020), AE had rolled out an 'assisted application process' that enabled Brazil's public delivery service (Correios) to apply on behalf of vulnerable persons, mostly people living in the streets who approached them with such request (GoB, Min. Cidadania and GoB, Correio 2020). With only 14,554 applications filed under this system though (GoB, TCU 2020), the initiative arguably was undermined by the fact that vulnerable people do not have a strong reflex to search that kind of support at the Correios, since this traditionally falls under the responsibility of SUAS. Furthermore, this passive approach and the short time frame of the initiative might have further contributed to its small take-up rate. Arguably, had SUAS been involved in the program, it would probably have received more demand for assisted applications, and with the due inputs SUAS could even have led a national active search campaign.

**3. The selection process was entirely based on the analysis of administrative registries, which was constantly altered by decisions of a board that could have featured more representatives of local-level governments and social assistance stakeholders.** AE's selection process was entirely based on the analysis of administrative registries, which has benefited from a state-of-the-art analytical basis compiling, with unprecedented access to dozens of registries. The program had a CMC including advisory participation from comptroller and accountability organs, such as CGU and TCU. The CMC played a key role in the program as it would meet almost every week to assess targeting issues and propose modifications on the selection process to mitigate them. With a strong bias to curbing inclusion errors, the institution has contributed to the significant expansion of the registries available for assessing applicant's eligibility (World Bank 2021a). This started with access to 17 registries previously consolidated under National Registry of Social Information (CNIS) (Brazil's core integrated registry for labor and social insurance), but gradually increased to over 40 registries (over 100 if considering some of those are actually sets of not exactly comparable registries received from subnational governments) (GoB, Dataprev 2020a, 2020b, 2021; GoB, Min. Cidadania 2021d; World Bank 2021b).

**Despite playing a major role in curbing inclusion errors, some of the measures adopted in this process might have taken place at the expense of increased risk of inclusion errors and limitation of the programs' predictability.** Examples include the use of incarceration lists that did not identify people who were actually serving alternative sentences (and therefore qualify as eligible to the program); lists of subnational governments' staff and military personnel that were marked with outdated information (thus rendering ineligible people who had long quitted these positions); lists of elected politicians that did not distinguish between those exerting actual mandates and those who are only unpaid substitutes; list of emigrated persons that consistently fail to acknowledge returnees or people living in border cities; and so on (GoB, Dataprev 2020a, 2020b, 2021; GoB, Min. Cidadania 2021d; World Bank 2021b). Being a traditional channel for echoing rights and demands of social protection beneficiaries, it is reasonable to expect that beneficiaries' interest would have featured more prominently in the CGU considerations had SUAS been part of it.

**4. AE's channels for administrative contestation went through periods of saturation of its processing capacity, subsequently aggravating risks of exclusion errors and contributing to a surge of litigations against the program.** Over and above those registries of more questionable quality, it is plausible that even otherwise good registries in Brazil might not accurately reflect one's status at all times. A common mistake affecting AE's selection process, for instance, was small mismatches between the extracts used for the selection process and the applicant's actual situation. In many cases, information on loss of employment, for instance, takes long to be updated into important labor and occupational registries, thus rendering such applicants ineligible. This has prompted AE to roll out an automatic contestation feature, available through the app and other websites, which would basically rerun the selection process in the hope that outdated information at the time of first application might have updated. Although convenient and capable of resolving the largest share of contestations to the program, this mechanism was not enough to identify all possible mistakes. Common situations not covered by that solution would include, for instance, people whose previous employers would not mark the termination of the contract in the appropriate administrative registries or people who were mistakenly reported dead on registries. For addressing these situations, AE has even established a partnership with DPU, wherein public defendants would be able to revert the status based on a mistaken administrative registry upon authenticating some predetermined documentation to be provided by the contesting applicant. Despite being ingenious, this solution has lacked scale to fully process the surge of contestations, since DPU only covers some 30 percent of the territory and, with only 46 out of its 471 public defendants being allocated to this task, it has only processed some 5,000 contestations (DPU 2021; GoB, Min. Cidadania 2020h, 2020j).

**Arguably, the involvement of SUAS in AE could have played a role in increasing the case management capacity of the extrajudicial contestation mechanism, especially considering it already had an objective framework instructing public defendants about what exact documentation could be considered for contesting divergent administrative information.** The saturation of AE's capacity to manage contestation at times not only might have challenged the program's coverage and impacts but probably also contributed to the high administrative costs incurred by the treasury upon the surge of litigations against the program (since it bears all costs in such cases, from sponsoring court costs to providing public defendants for the poor, not to mention promoting the defense of the program and, naturally, complying with judicial sentences). Whereas the extrajudicial contestation by DPU was limited to 5,000 cases, individual litigations surpassed the figure of 225,000 processes between April and June 2020, which were accompanied by over 60 class actions (DPU 2021; GoB, DPU 2021; World Bank 2021a).

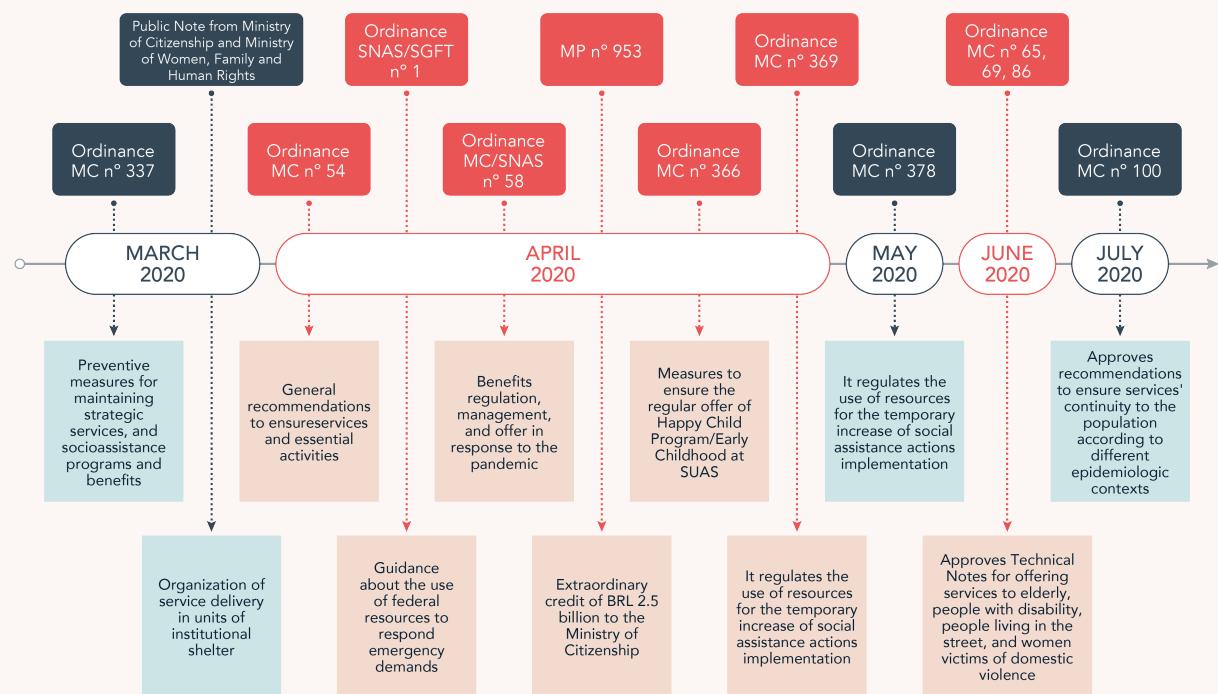
**Despite not being formally integrated to AE's operation, SUAS has informally got involved as a way of addressing the many demands it gets from the society.** Despite not having a system like that of the Correios that allowed assisted enrollment, there have been several cases of subnational social assistance units organizing task forces to help people applying through their own phones and even through phones lent by friends and family. SUAS has also registered experiences of subnational units coordinating with DPU to facilitate their access to the program's contestation mechanism. Overall, in certain states and municipalities, SUAS has also provided support for the dissemination of information on the program, including active search for potential beneficiaries and supporting them to apply. There was even some explicit collaboration with the MC that would produce tailored material to support SUAS and subnational governments on that effort, including the production of WhatsApp tailored content since this was the main media for communication among SUAS staff and, also, between them and the communities they served (GoB, Min. Cidadania 2020d; Prefeitura Campo Grande 2021; Prefeitura Ibitinga 2020; Prefeitura Rio Grande 2020; Prefeitura São João Batista 2020; Prefeitura Taquari 2020; Prefeitura Ubatuba 2020; Prefeitura Vitória da Conquista 2020).

**Limitation of SUAS's informal involvement included the lack of access to appropriate systems for assisted enrollment, contestation, and insights on reasons for ineligibility.** SUAS's informal support also took place without broader guidelines to enable shared actions by different governments. Crucially, there was no dedicated funding to support such kind of initiatives. A core limitation of SUAS impact through this informal support had to do with its lack of a dedicated system for supporting DPU's assessing contestation and for enrolling people (since the enrollment through third-party cellphones would require exploring a loophole of the system by using a different SIM card for every new application). Another important limitation was the lack of coordination for these measures at the regional or national level, and thus SUAS support to the population was fragmented and irregular. Most importantly, SUAS did not receive specific funds to cover these informal activities. Although SUAS had received high extraordinary allocations from the central government in 2020, these were tied to specific forms of disbursements and programs not related to AE (IPEA 2021a; World Bank 2021a). One important measure adopted to support SUAS funding necessities, however, stemmed from the MC's decision to keep paying the IGD-Bolsa grant even though the core functions it meant to remunerate (that is, update information on Single Registry and monitor PBF conditionalities) were halted (GoB, Min. Cidadania 2021c).

# 6. Complementary decentralization measures of the social protection sector during the COVID-19 pandemic

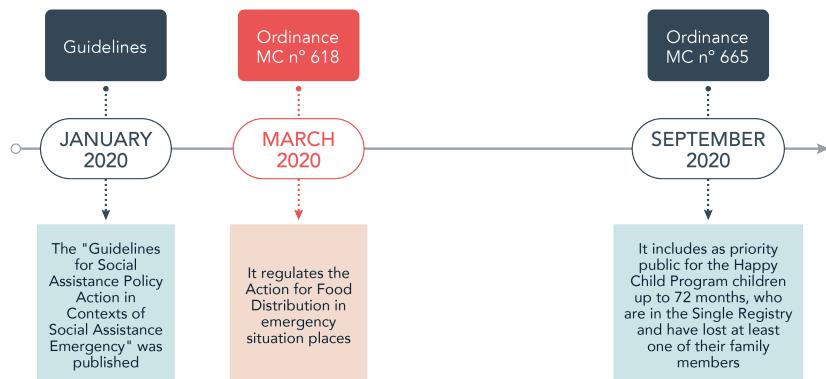
**Despite SUAS's limited role in AE, the system has played a major role in enabling other forms of response to the crisis and ensuring the continuity of services and programs that both complement the support provided by AE and reach out to persons subject to other forms of vulnerability not covered by AE.** Figure 7 and Figure 8 summarize some of the core legislative frameworks enabling such measures, which are further explained in this chapter through a summary of actions elaborated by GESUAS, a management software for social assistance (GESUAS 2020).

**Figure 7. Legal framework with key central government-related measures with effect at decentralized modalities of social assistance services in 2020**



Source: Elaborated and shared with us by Renata Aparecida Ferreira, World Bank Consultant.

**Figure 8. Legal framework with key central government-related measures with effect at decentralized modalities of social assistance services in 2020**



Source: Elaborated and shared with us by Renata Aparecida Ferreira, World Bank Consultant.

### **A first set of relevant measures contributing to the decentralization of social assistance during the pandemic aimed at ensuring that SUAS could continue some of its key functions.**

Law nº 13.979 of February 6, 2020, for instance, established that the following services are to be considered essential and therefore provided even during the pandemic: the protection of women suffering from domestic violence, children, adolescents, elders, and crime victims. This law was sanctioned by Decree nº 10.282 of March 20, 2020, which considered social assistance at large as an essential activity. Moreover, MC's Ordinance nº 337 of March 24, 2020, sets for the provision of social services remotely, the suspension of group activities, the provision of individual protection equipment, and the maintenance of IGD-SUAS despite the discontinuation of services it is meant to remunerate (which was a form of contributing to the funding of social assistance services). Furthermore, the decree postpones the deadline for some accountability purposes related to the *Serviço de Convivência e Fortalecimento de Vínculos* (SCFV)<sup>6</sup> which otherwise could have resulted in halting funds for units unable to do so in the original time frame.

**SNAS/SEDS/MC Joint Ordinance nº 54/2020 of April 1, 2020, was fundamental to discipline the continuity of both services included in SUAS regular basket of services and its engagement in the delivery of occasional services deployed in a more ad hoc form during the pandemic.** This ordinance proposed several measures to enable the supply of social assistance services at the municipal level, safeguarding the health of both users and providers. It has also called for integrated actions between social assistance and health services. It complements previous recommendations by specific guidelines for undertaking remote services via WhatsApp and for maximizing safety in cases requiring presential meetings. It also offered recommendations for certain specific services offered by SUAS: *Serviços de Acolhimento*<sup>7</sup>, SCFV, *Serviço de Proteção Social Especial para Pessoas com Deficiência, Idosos*

<sup>6</sup> The SCFV is a set of services performed in groups which seeks to complement social work with families and prevent the occurrence of situations of social risk. One of SCFV's main goal is to strengthen family and community relationships and to promote integration and the exchange of experiences among participants, valuing the meaning of collective life. This social assistance service is offered by social workers in CRAS.

<sup>7</sup> The Shelter Units (Unidades de Acolhimento) offer Shelter Services (*Serviços de Acolhimento*). Those services target extreme vulnerable groups as children and adolescents; young people from 18 to 21 years; old people; adults with disabilities; homeless people; migrants; women in situations of domestic and family violence; and adults and families affected by public calamities and emergencies. Shelter Services are free for everyone since social assistance is a right of the entire Brazilian population.

e suas Famílias<sup>8</sup>, and other high complexity services provided by the Centers of Reference to Street Dwellers (Centro de Referência para População em Situação de Rua, Centro Pop). Finally, the measure recalls SUAS involvement in the provision of occasional services deployed during the pandemic.

**Such occasional services refer to activities that are not part of SUAS's regular basic service basket but which were deployed with different durations, and under special regimes, as a response to the pandemic.** These occasional services were varied and oftentimes fragmented, and in many cases, they could not operate based on a strict and objective selection process; hence, in many cases, SUAS staff were empowered to undertake their own ground assessments of one's eligibility. This was made possible by Social Assistance National Secretary (Secretaria Nacional de Assistência Social, SNAS) Ordinance n° 58 of April 15, 2020, which has also defined rules for municipal governments to adhere to such measures.

**Both the continuity and the adequacy of protective services to vulnerable groups, such as children, elders, the disabled, victims of domestic violence, and home dwellers was provided by additional operational instructions.** Joint Recommendation n° 1 dated April 16, 2020, for instance, set guidelines for protective child and adolescent services, including measures to promote foster care and permanent tutelage of children at risk by social assistance workers directly and/or by children's sponsors/godparents. SNAS Ordinance n° 59 of April 22, 2020, in turn, set specific measures to protect children under the state's tutelage from COVID-19, including dispositions for furthering SUAS collaboration with stakeholders across the legal and health sectors. Targeting street dwellers, SNAS Ordinance n° 69 of May 14, 2020, contributed to the maintenance of services offered by CREAS and Centro Pop: SEPOP, PAEFI, Abordagem Social, and the management of high complexity cases. The provision of services to female victims of domestic violence, in turn, was promoted by SNAS Ordinance n° 86 of June 1, 2020.

**Another important measure was the flexibilization of SUAS-related procedures to enroll new beneficiaries on Benefício Prestação Continuada (BPC) during the pandemic.** BPC is Brazil's flagship non-contributory pension/grant to poor elders and disabled, and fast-tracking its otherwise complex selection process was key to assist these populations during the pandemic. MC Ordinance n° 330 of March 18, 2020, has postponed in 120 days the period for BPC's newly selected beneficiaries to enroll on CadÚnico to not have their benefits canceled.

**Although PBF has waived the requirement for mandatory regular updates of its beneficiaries in the Single Registry registry, SUAS—who is CadÚnico's main feeder—had adapted to enable these options to those wishing to do so.** This was made possible by Ordinance n° 368 of April 29, 2020, authorizing the updating of Cadastro Único information via phone calls. This was further operationalized by DECAU/SAGI/MC Operational Instruction n° 4 of April 30, 2020.

**SUAS remuneration and participation in the delivery of Programa Criança Feliz (PCF) was also adapted.** Joint Ordinance n° 7 of April 22, 2020, extended the deadline for social assistance units to file their registry of household visits as part of PCF to be rewarded for these accordingly. It also lays out additional measures to keep this program operational considering

<sup>8</sup> The Special Social Protection Service for People with Disabilities, Elderly People and their Families (Serviço de Proteção Social Especial para Pessoas com Deficiência, Idosos e suas Famílias) aims to reduce social exclusion—for the dependent and for the caregiver, the burden resulting from the situation of dependency/provision of long-term care, and interrupt the violation of rights that weaken autonomy and intensify the degree of dependence of people with disabilities or elderly people.

special social isolation measures required during the pandemic. MC Ordinance n° 366 of April 22, 2020, postpones PCF-related presential trainings, unfolding the possibility of shifting these into remote formats, redefining the remuneration criteria for those attending such trainings. Subsequently, Joint Ordinance n° 1 of April 27, 2020, disciplined alternative remuneration rules for social assistance and program managers of PCF, considering the altered format of training sessions and changes to the program's implementation routine.

**Most of these abovementioned measures were only possible due to budgetary and funding instruments set to keep SUAS operational in the delivery of both its regular and extraordinary functions<sup>9</sup>.** Key to that was SNAS/SEDS/MC Joint Ordinance n° 1 of April 2, 2020, authorizing the utilization of extraordinary resources to support social assistance services to fight the pandemic, with the exception of occasional services that had to have their own funding mechanisms. It also authorizes the utilization of resources from the BPC Escola (ressarcimento)<sup>10</sup> to fund the basic social protection and special social protection services provided by SUAS. The ordinance further excused social assistance expenditures to diverge from regular planning instruments, such as Multi-Year Plan (PPA), LDO, and LOA, and allows the CMAS to reprogram its budgets through a designated web portal. The measure also authorized CMAS to undertake a simplified accountability routine provided all proofs of disbursements are kept for potential auditing in the future.

**MP n° 953 of April 15, 2020, offered R\$2.5 billion of extraordinary credit to SUAS actions supporting the combat to the pandemic.** This was further disciplined by MC Ordinance n° 369 of April 29, 2020, which provided that some of this could be spent acquiring individual protection equipment, but most of it was allocated to fund food distribution campaigns led by SUAS and targeted at beneficiaries of the special protective services for elders and the disabled. More specifically, this has defined an objective formulae to calculate the distribution of resources to municipalities according to objective demographic features. Subsequently, SNAS/SEDS/MC Joint Ordinance n° 63 of April 30, 2020, established time frames and rules for municipalities wishing to benefit from the extraordinary transfer.

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<sup>9</sup> For a thorough analysis on the adequacy of these funds see IPEA 2021b.

<sup>10</sup> Basic Social Protection (Proteção Social Básica) aims to prevent risky situations, through the strengthening of family and community bonds.

## 7. Lessons learned for emergency response in the future

**The terms governing the relationship between SUAS and the central government should undergo modifications to prevent the system from excluding similar emergency programs that might take place in the future.** Albeit unprecedented, the shock experienced due to COVID-19 since 2020 will probably not be the last of its kind, as there are fears that the pandemic itself might go through cycles of détente and exacerbation, even if only for certain territories. Naturally, other catastrophes may also happen in the future, requiring the country to be able to respond quickly and efficiently. To be prepared for these possible scenarios, there are at least two measures that should be taken by Brazil's social protection system. On the one hand, SUAS could develop some simplified decision-making process for context of crisis and emergencies, to be able to strike agreements with institution leading emergency responses at a fast pace that these occasions require. On the other hand, it seems adequate that the social protection system defines some basic functions that SUAS could perform on emergency social protection responses regardless of additional agreements to be struck on a conjunctural basis. Subsequently, this proposal also necessitates having predefined funding agreements to remunerate SUAS when they get deployed to pre-established functions in support of emergency programs. Over and above these, it is also important that SUAS gets to enjoy some minimum guarantees of basic and regular budget capable of enabling its auxiliary support even in programs where it cannot feature as a formal partner but still turns out playing a relevant role.

**The use of centralized and IT-enabled systems in support of social protection processes can be complementary, rather than a substitute, of local governments' engagement.** The capacity to mainstream front-end social assistance services across the country remains unparalleled. If introduced in a complementary way, social assistance can mitigate the risks of digital exclusion, and at the same time avoid the alienation of local professionals in the delivery process. The latter remain the main institutional reference on the territory to interact with the federal government, and staff are trained to work with a vulnerable audience.

**It is important that the legacy of historical efforts in feeding and updating Single Registry is not taken for granted under the assumption that temporary and ad hoc registries could be a suitable substitute of this tool.** Single Registry enabled the fastest enrollment channel of AE and probably reaching out to the most vulnerable population who would otherwise struggle to gain access via the app-based channel. It is therefore concerning that the update of Single Registry has not been mandatory since the beginning of the pandemic and the main program that stimulates people to do so, the PBF, has been recently discontinued with uncertainty about whether its substitute will keep up with the mutually beneficial relationship PBF nourished with Single Registry. Unless the routine feeding and updating process of Single Registry does not resume soon, this important instrument might become severely compromised with immediate effects to the operability of core social protection functions of the country.

**The AE contestation mechanisms, via app or site and the extrajudicial contestation, have pioneered promising mechanics that ought to be mainstreamed for other regular programs on a large scale.** Before AE, PBF, for instance, did not have a formal mechanism for contesting rejected applications, and exclusion errors were mitigated solely by the assisted enrollment that counted on SUAS expertise to make sure applications were made with maximum chance of getting accepted. Yet, the opportunity to contest denials is important and the mechanisms launched by AE toward that purpose are truly promising. Other regular programs should also provide automated contestation apps and websites to mitigate wrong decisions due to small delays in the update of administrative registries used in the selection process. The proposal of overriding strictly administrative analysis by additional documental analysis is also interesting, but AE has identified that DPU does not have the required scale and capillarity to process this on its own. For mainstreaming one such mechanism, it could be interesting to delegate such functions to subnational governments, with the SUAS featuring as a good alternative for doing so.

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