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## The Private Sector's Role in Reforming Public Procurement: The Case of Colombia

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### Article at a glance

- Corruption was long a taboo subject in Colombia.
- The Colombian Confederation of Chambers of Commerce (Confecámaras) shed light on the extent of corruption by surveying local businesses.
- Confecámaras focused on improving transparency in public procurement.
- Confecámaras helped revise Colombia's public procurement law, and created a platform for public-private dialogue on corruption.

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## Introduction

For a long time, corruption was a taboo subject in development debates. But, a growing concern about corruption among the international community has influenced the worldwide efforts against this practice. By the end of the 1990s, the pace of anti-corruption work accelerated in various international forums. In 1996, member countries of the Organization of American States adopted the Inter-American Convention Against Corruption, the world's first anti-corruption treaty. The Organisation for Economic Co-Operation and Development (OECD) urged its member states to stop allowing companies to write off bribes as tax deductions.

Following suit, the World Bank tightened procurement and loan procedures and publicly called for a campaign against corruption. The World Trade Organization (WTO) began discussions on building transparency standards in government procurement practices. The International Chamber of Commerce issued stringent new rules prohibiting bribery, kickbacks, and extortion. The United Nations Convention against Corruption was adopted in 2003 and subsequently has been signed by 140 countries around the globe. In all, the international anti-corruption movement began to gain significant momentum.

In this broader context, the anti-corruption movement also started to gain momentum in Colombia. In the late 1990s, the country faced a deep recession and unemployment levels at 20 percent. At the time, the Colombian Confederation of Chambers of Commerce (Confecámaras) identified corruption – in both the public and private sectors – as one of the key issues to be addressed in order to improve the quality of democratic governance institutions and broader economic performance. With assistance from CIPE, Confecámaras was the first private sector organization to undertake a dedicated anti-corruption campaign in Colombia, working with businesses and the Colombian Government to reform public procurement practices.

Public procurement is often one of the most corruption-prone areas, especially in emerging markets where governance and enforcement mechanisms are weak. It can become so taxing on business that bribes simply become an added cost that all bidders must take into consideration when bidding on public contracts. In the 1990s, this was the reality of doing business in Colombia. In 1998, Transparency International's Corruption Perception Index ranked Colombia 79th out of 85 evaluated countries, with a low score of 2.2 on a 10-point scale.

Confecámaras highlighted the need to change this and inject more transparency in the procurement process. It raised awareness about the corruption problem among businesses and the general public, engaged the business community in anti-corruption reforms, and created a platform for public-private dialogue. In a culmination of these efforts, Confecámaras became a leading advocate for the reform of Colombia's Procurement Law and successfully promoted guidelines that enhanced competitiveness and transparency in public procurement. The country's new Procurement Law, which passed in early 2007, incorporated a significant number of Confecámaras's recommendations. Notably, it eliminated automatic concessions in public bids and strengthened the transparent participation of small and medium-sized enterprises in public procurement.

## Forms of Corruption in Public Procurement

Government procurement is particularly susceptible to corruption because of the large amounts of funds involved in relatively low volume, high-value transactions. It makes public procurement more attractive to corrupt officials than private procurement, which by contrast, usually involves a much higher volume of low-value transactions. The individual discretion of public officials exponentially raises the risk of corruption in comparison with other areas of public expenditure, occurring even in cases where competitive bidding takes place. Monopoly of

power, weak accountability, and opacity also increase the opportunity for corruption. Likewise, the existence of bidding companies that rely heavily on public contracts for their survival is yet another factor that increases the susceptibility of public procurement to corruption, especially in developing countries where the dependency of many private sector companies on government procurement is disproportionately large.<sup>1</sup>

Correct understanding of public procurement in practice is a key to fighting corruption by helping to identify corruption schemes and vulnerabilities along the procurement chain. Public procurement is a central area of public spending, and is therefore highly exposed to mismanagement and potential corruption. It is also a process embedded in the political system and therefore a major indicator of governance quality. Governments are increasingly judged on the quality of governance they provide, in particular on how integrity, transparency, and accountability are ensured in public procurement. In order to be improved in this regard, public procurement processes must be responsive to the demands of its stakeholders, namely the government, the private sector, and the general public.

Procurement can be divided into three stages: tendering, evaluation and award notification, and review procedures. Abuses can occur at any of those stages. There are cases where certain firms agree on “rigging” the prices that they submit to the procuring entity. Often, this involves each firm taking its turn to win a government contract, especially when there is repeated tendering by the government over time. In other cases, a firm or firms may attempt to bribe government officials to view their tenders more favorably. Bid rigging occurs when a competitive public tender is manipulated in such a way that a pre-selected bidder wins the tender.

Bribes, or kickbacks, are common features of corruption schemes in public procurement. Kickbacks typically consist of a percentage of a contract’s value and they occur when companies that win public contracts “kick back” bribes to the government official(s) who influence the awarding of contracts to them. Some experts have

also uncovered elaborate “commission-sharing agreements” between multinational companies engaged in joint ventures that pay kickbacks both to buy influence over the procurement decision-making process and to solicit direct rewards. Another practice involves using shell companies to rig the tender process and exert coercive influence over other, genuine bidders to ensure that a certain company wins the contract.<sup>2</sup> Public officials may also subvert public procurement procedures simply by misrepresenting facts. They may collude with a favored bidder to enable that bidder to win a contract that it would not have won had the rules of the tender been correctly applied.

In many of these cases, the ability of purchasing governments to detect these illicit transactions is often constrained by the fact that many such agreements between foreign or national companies and public agents appear legitimate and customary. Thus, corruption opportunities may only be eliminated by a well-designed and well-regulated systemic approach, capable of reducing the risk of corruption under the prudent assumption that no public procurement system is totally corruption-proof.

## **The Need for Public Procurement Reform in Colombia**

Despite its apparent benefits, procurement reform is often notoriously difficult to accomplish. Impediments to reform include deeply vested interests, lack of political will, paucity of technical knowledge and capacity, complexity of the issues involved, and enforcement-related matters. Even with great effort invested in reform, procurement continues to be an area of heightened corruption risk all around the globe. Public procurement usually accounts for around 10-20 percent of a country’s gross domestic product (GDP) and estimates show that at least \$400 billion is lost to bribery and corruption each year, representing a 20-25 percent procurement cost increase.<sup>3</sup> In Colombia, public procurement accounts for approximately 11 percent of GDP.<sup>4</sup> According to the estimates of *Transparencia por Colombia*, the

country chapter of Transparency International, 10 percent of the overall public procurement is lost in bribes and corruption each year, which in 2008 translated into roughly \$810 million.

Thanks to the political reforms of the 1990s, Colombia's political system moved toward greater competence, openness, and accountability, paving the way toward addressing the issue of corruption in procurement in an open and transparent manner. In 1991, a new constitution came into effect and spurred efforts to combat corruption because, according to anti-corruption expert Felipe Sáez, it "increased the state's ability to sanction corrupt practices."<sup>5</sup> In practice, governance in Colombia's public institutions remained relatively weak, sustaining a highly corrupt environment:

"Although in 1991 Colombians believed that the anti-corruption inspiration of the new constitution would translate into a much cleaner and more transparent system, the reality was very different. Rich in rights and liberties, as well as the description of instruments to protect these, the 1991 constitution also defined a political system that favored the growth of administrative corruption. It limited the independence of public powers. It was conducive to accepting gratuities. It favored the appropriation of public funds into private pockets. And it limited the control entities' real powers."<sup>6</sup>

Similar weaknesses haunted Colombia's procurement regulatory framework, Law 80, established in 1993 and aimed at simplifying procurement procedures based on the principles of transparency and objective selection. It eliminated bureaucratic requirements that increased prices of public services and limited their availability, but at the same time numerous exceptions were written into the statute, leaving much discretionary power to administrators. For example, the law did not apply to contracts for the exploration and exploitation of renewable or non-renewable natural resources. Similarly, all contracts related to telecommunications, radio, and courier services were governed by special legislation. All those legal loopholes and regulatory shortcomings created

ample opportunities for corruption. The lack of fiscal oversight of government procurement in the old Law 80, stemming from the various ways to avoid supervision by the authorities (controller and prosecutor general offices), made evident the need for reform.

## Private Sector Takes the Lead

Colombia's private sector – although to a degree a complacent participant in procurement-related corruption – has been also one of its key victims. Pervasive corruption in the public sector costs Colombian businesses substantial sums of money each year, yet the private sector has traditionally been reluctant to challenge these practices for fear of retribution and due to the lack of collective action. Confecámaras set out to change that and make the business community part of the solution to the corruption problem. Confecámaras's private sector initiative to combat corruption in Colombia program, called Probidad ("Integrity") and created with support from CIPE in late 1999, sought to fight corruption in the public sector and to change the culture of business.

In order to gauge the perceptions of public sector corruption by businesses, Confecámaras developed a detailed survey under the Probidad program and gathered responses from 420 companies that had done business with the government. The survey showed that 84 percent of the country's entrepreneurs abstained from participating in public procurement bids or auctions because they considered bidding conditions unfair due to corruption in contracting processes. It also showed that there was a large influence of bribery and a lack of public reporting. Based on a hypothetical scenario, respondents were asked to estimate the amount paid to secure a contract: in Medellín, the bribe was approximately 11.9 percent of the total contract value, in Bogotá 12.4 percent, in Cali 13.6 percent, and in Barranquilla 18.3 percent. Thirty-eight percent of respondents said that they knew in advance the amount of the bribe, what form the payments should take, and nearly half of them indicated they routinely include bribe costs in their budgets.

Some of the survey's most troubling results showed that a lack of accountability and transparency existed at every level of government, from the municipal to the national. The causes are diverse, including weak institutional capacity, lack of professional training, pervasive sense of impunity, clientelism, and even drug trafficking and guerrilla violence. The political and economic consequences of widespread corruption have been devastating: it has damaged the credibility of the Colombian authorities and threatened the foundation of a modern democracy – citizens' trust in government. Corruption has also weakened the financial standing of the nation as a whole, interfering with its ability to generate private sector-led growth and to attract and maintain foreign investment.

The survey results also revealed the lack of debate on the distinction between legality and ethics, prevalent at that time: the fact that the procurement law permitted certain behaviors was the reason why many businesses had little ethical concerns over their behavior. At the same time, the results suggested that the timing is right for reform initiated by the private sector. Although the majority of business leaders in the survey acknowledged that they have engaged in unethical practices to achieve their economic objectives, 62 percent said that they were ready to commit to higher ethical standards.

Confecámaras undertook several even more comprehensive surveys in the following years, which established a much-needed baseline for the private sector in Colombia regarding corruption. The second edition of the Probidad survey, conducted in 2002, included the four cities previously covered and added five more: Bucaramanga, Cartagena, Pereira, Cúcuta and Popayán. The survey noted more than a 100 percent increase in the number of respondents, reaching a total of 900 business leaders. Thanks to those efforts, Confecámaras was in a position to initiate national discussion on anti-corruption in public procurement. By the time the third edition of the Probidad survey (expanded to 15 cities) was released in 2004, the push to reform the Colombian procurement statute had gained significant momentum. The most recent survey was performed in 2006 among nearly 1,700

entrepreneurs in 18 cities. Its results revealed that 47 percent of respondents believed bribe payments are almost always required to guarantee successful bidding processes, and such payments usually amount to approximately 12.9 percent of the value of the contract.

The impact of publishing these surveys is difficult to overestimate, since they opened the debate on the participation of the private sector in corruption, but more importantly on what the private sector can do in partnership with the government to limit corruption in public procurement. Subsequently, the surveys were used by the Colombian Government in the formulation of anti-corruption public policy and enactment of laws. They also served as a platform from which other anti-corruption Confecámaras initiatives were launched.

## Changing the Status Quo

Bolstered by greater awareness of corruption both among the business community and the larger public, Confecámaras developed several key frameworks for pursuing its two primary objectives: combating corruption in general and addressing procurement problems in particular.<sup>7</sup> One of these frameworks, created in early 2003 just before the elections for governors and mayors, focused on integrity pacts. They were formal anti-corruption agreements meant to solidify political candidates' public commitment to transparency. A total of 78 elected mayors and 16 governors committed to transparent practices in this way. To complement the process, Confecámaras mobilized citizen organizations to form follow-up committees that would gauge compliance with the integrity pacts after the elections.

For example, in the city of Manizales, the municipal government made integrity pacts mandatory for most large-scale public bids. In 2004, the mayor of Manizales, the governor of Caldas, and civil society representatives signed a pact under which an oversight committee was formed to monitor transparency of the local public procurement. The committee comprised

participating public sector agencies and businesses, the local chamber of commerce, and Probidad project staff. It has been producing quarterly follow-up evaluation reports on the pact. One of the main results has been the acknowledgement of the lack of credible information and limited management of the existing information as a key barrier to improving transparency in public procurement locally.

Confecámaras also developed the Ethical Code of Conduct, a voluntary measure to promote higher standards of integrity in business transactions and to provide protection for firms that are subjected to extortion attempts. For its pilot program in November 2003, Confecámaras selected 10 small and medium-sized enterprises (SMEs) in Bogotá that subscribed to the code. The program evaluated the effectiveness of the code and incorporated the findings in a revised version. In 2005, Confecámaras published the “Guide for Ethical Management of SMEs,” and followed up with workshops in six cities to promote the guide and explain how ethics can be a competitive tool for businesses. In all, 1,855 businesspeople subscribed to the code and its principles.

Lastly, the key element of Probidad’s objectives was to change of legal and regulatory environment in order to undercut corrupt practices in public procurement. For that purpose, Confecámaras engaged in the promotion of procurement reform to amend Law 80 of 1993 regulating government contracting in Colombia.

## Reforming Colombia’s Procurement Law

Confecámaras started working on a reform proposal in 2002, focusing on building ethical concepts into the law and achieving improvements in contracting processes. The support of the executive branch of the government was crucial to these efforts, in particular the Office of Vice President Francisco Santos who showed great interest in the

## Economic Analysis of the Reform of Colombia’s Procurement Law

### *Key engaged parties*

- Colombian Confederation of Chambers of Commerce (Confecámaras)
- Political Science Institute
- Business associations
- National Congress and various contracting agencies

### *Key steps*

- Provided opportunities for the business community and civil society to comment on the draft law
- Provided key information on challenges to implementation of the draft law to the National Congress
- Generated alternative propositions
- Provided oversight of the process of procurement law reform, follow up on key changes

### *Benefits for engaged parties*

- Introduction of more transparent procurement practices
- Greater competition among companies
- Increased involvement of international participants in procurement
- Greater assurances for the public and evaluation of investments

subject. At the same time, Confecámaras strived to involve the broader business community in procurement reforms and managed to engage entrepreneurs from various regions of Colombia in the debate on the issue.

Confecámaras’ next step was to forge an alliance with the Controller General’s Office to involve mayors, governors, and other public officials in the reform debate. Given the rising public concern over how the authorities worked to improve transparency in public procurement processes, timing seemed right. Unfortunately, the legislature was distracted by a debate on the presidential reelection, and stalled on reform between 2003 and 2005. The broad-base impulse for reform seemed to have lost its strength and just a few efforts were made during that period by specific business sectors.

In 2006, the Political Science Institute, the Universidad Externado de Colombia, Confecámaras, and the Vice President's anti-corruption program jointly launched a new initiative. These four entities revived the debate over Law 80 reform, calling for an increased transparency of the procurement process. Their combined efforts led to the creation of the Economic Analysis for the Reform of the Procurement Law program, a partnership of the National Congress of Colombia, Confecámaras, the Political Science Institute and local business groups and associations, which documented the sessions of Congress dealing with the procurement reform. This information was then analyzed and made available to the public through the websites of the program's members, and conclusions and opinions on procurement reform were submitted to the Congress.

A total of three procurement law reform bills were presented and ultimately unified into one proposal. It suggested that cooperatives and associations involved in procurement with regional governments should be included under a single procurement law and should compete on equal footing with private entities. It also included international cooperation agreements under the national procurement law even in cases where international entities involved are hired by regional governments.

The proposal mandated the evaluation of procurement bids on technical and economic aspects only and sought to eliminate barriers to implementing e-procurement by developing an integrated electronic procurement system (SICE). The Single Procurement Portal (Portal Único de Contratación) was the suggested entry point for companies to the entire process.

Almost all Congressional and other debates on the new law referenced Confecámaras's research (including the results of Probidad surveys), analysis, and recommendations. This cooperation between the public and private sector during the reform process resulted in a passage of the new Colombian Procurement

Law, Law 1150 of 2007 that enhanced transparency and efficiency in government procurement and included Confecámaras's key recommendations.

## Impact of the New Procurement Law

The issuance of the new Law 1150 of 2007 concluded the lengthy debate on the necessity for reform of government procurement in Colombia. Law 1150 made important progress in protecting the country's public procurement system from the risks of corruption. It equalized the application of procurement rules to central and regional government offices (in the past, different laws applied) and at least partially addressed the problem of exceptions to Law 80 by regulating all public regional institutions and public universities under the common procurement regime (as long as the object of a contract is other than scholarly or academic activities) and by providing an abridged procurement mechanism for certain processes that were previously subject to direct contracting.<sup>8</sup> The new law also emphasized implementing information technology tools to increase access to information and make public procurement more transparent.

Just like any given legal act, Law 1150 is far from perfect. It lacks depth in changes to the direct contracting rules; it did not fully resolve the problem of government officials using their

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## Impact on Reform

- 1,855 businesspeople voluntarily subscribed to the Ethical Code of Conduct developed by Confecámaras to foster a culture of transparency.
  - 16 integrity pacts were signed since 2002, representing a total value of \$2,089,000 in contracts signed in the cities of Manizales and Tunja. Sixteen governors and 78 mayors signed integrity pacts.
  - The new national Procurement Law of 2007 eliminated automatic concessions in public bids and strengthened the transparent participation of local small- and medium-sized enterprises in the process.
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discretionary power to bias the terms of reference; and the compliance with its guidelines on using technology to make the whole process publicly available has been only partial (Law 1150 did create the integrated Electronic System for Public Procurement, or SECOP, but areas for improvement remain and the e-procurement vigilance system still has many inconsistencies that can favor certain bidders). Those shortcomings illustrate that the ultimate solution to corruption must go beyond just passing new laws and regulations, and must also focus on instilling the culture of integrity in a country's business culture.

As *Transparencia por Colombia* put it, “better laws are necessary but are not sufficient.”<sup>9</sup> Indeed, in and of itself Law 1150 – or any other single law for that matter – does not solve the issue of corruption. Corruption persists in Colombia and elsewhere because it is a structural problem embedded in the larger legal, regulatory, enforcement, and governance system. Still, the passage of the Law 1150 represents a significant step forward for Colombia. The way in which this new public procurement law was passed promoted broader participation of the private sector in the anti-corruption policymaking process and established a platform for cooperation among various stakeholders engaged in reforms.

The success of anti-corruption initiatives in Colombia requires the continuation of these joint efforts by the private sector, national and regional governments, civil society actors, and international institutions to further identify opportunities for public-private partnerships, facilitate reforms, and increase their impact.

## The Road Ahead

Corruption is often a byproduct of complex and frequently changing laws and regulations. The discretionary power of government officials to interpret these laws and regulations is another key contributing factor. Therefore, establishing greater consistency and transparency in government procurement rules – as it was done in Colombia's Procurement Law reform – is an important step

in limiting corruption. But it is not the only step. Broader transparency reforms are necessary to bolster free media, create the rule of law, and improve democratic governance in order to directly address some of the root causes of corruption.<sup>10</sup>

Ultimately, common perceptions about corruption must be changed away from viewing it as a norm toward treating it as an aberration that can and should be eradicated. Achieving that goal is especially crucial in developing countries where corruption takes a disproportionately large toll on the efficiency and credibility of their political and economic systems. Where corruption is entrenched, governments, businesses, civil society, and international organizations must work together to change this harmful status quo.

Confecámaras's Probidad surveys raised awareness of the need for anti-corruption reform among the business community and the society at large; they helped build the necessary momentum for reforms. The Ethical Code of Conduct elicited voluntary compliance by hundreds of businesses and fostered a culture of transparency. Integrity pacts signed by dozens of public officials demonstrated a clear and widespread commitment to transparency seen in Colombia for the first time. Finally, Confecámaras's active engagement in the legislative reform debate and the public-private partnership under the Economic Analysis for the Reform of the Procurement Law program resulted in the passage of Law 1150 of 2007.

Further elimination of opportunities for corruption among public officials, combined with effective enforcement remains a key priority. Some of the recommended measures include introducing sound procurement codes, third-party monitoring, independent audits, simplified procurement procedures for SMEs, removal of legal barriers and duplicative regulations, and competitive wages for civil servants. A point for improvement would also be to review the rules for direct contracting, allowing differential treatment depending on the type of contract (concession, public work, etc.) and fixing the value of contracts rather than it being

subject to the procuring entity's budget.

On the supply side, Confecámaras's work demonstrated that businesses cannot simply blame corruption on public officials and must recognize their own role in bribery and other forms of corrupt behavior. They should implement internal anti-corruption measures, use internationally accepted accounting standards, and promote freedom of information and transparent rules on disclosing conflict of interest. Entrepreneurs should build the culture of integrity so that when bribery occurs, it is clearly denounced. Through private sector organizations such as business associations and chambers of commerce entrepreneurs can also work together on specific policy measures. By engaging in advocacy to review the existing regulations and promote improved laws, businesses can effectively shape their country's institutional climate.

The public sector continues to struggle with effectively increasing the transparency of public procurement decisions, both nationally and regionally, and providing adequate training for civil servants on public procurement. At the same time, the private sector faces steep resource requirements necessary to maintain vigilance on their end of the procurement process. Therefore, progress must occur on both sides. Corruption can be effectively addressed only if integrity of the procurement process becomes more institutionalized and the oversight made more effective.

As the methods of corruption become more sophisticated, new means to fight it must be constantly created. This is especially important at the regional level since the majority of corruption cases occur in the regions and is often intertwined with local electoral politics. All too often governmental efforts to combat corruption focus too much on enforcement. But punishing corruption without introducing legal and regulatory reforms is a futile effort. Continued attention to corruption prevention is necessary to make sure that the legal framework does not create incentives for illicit behavior in both the public and private sectors. Confecámaras's efforts in Colombia can be an example of doing so. Collective action by the business community –

although not a silver bullet – can be an important strategy for tackling the corruption problem.

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## Notes

<sup>1</sup>Campos, J. Edgardo, Ware, Glenn; Moss, Shaun; Noone, Gregory, "Corruption in Public Procurement" in, Campos, Edgardo, Pradhan, Sanjay, *The Many Faces of Corruption*, World Bank Publications, Washington D.C., 2007, pp. 295-334

<sup>2</sup>See for example Volcker Committee tasked to report on the findings of an investigation to uncover illicit payments of nearly \$2 billion to Saddam Hussein under United Nations Oil-For-Food Program; report available online: <http://www.iic-offp.org/story27oct05.htm>

<sup>3</sup>Transparency International, 2006, *Handbook: Curbing corruption in Public Procurement*, [http://www.transparency.org/global\\_priorities/public\\_contracting](http://www.transparency.org/global_priorities/public_contracting)

<sup>4</sup>World Bank, *Country Procurement Assessment Report (Colombia)*, July 2005, [http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2005/08/08/000160016\\_20050808170408/Rendered/PDF/332600CO0CPAR01090August1501public1.pdf](http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2005/08/08/000160016_20050808170408/Rendered/PDF/332600CO0CPAR01090August1501public1.pdf)

<sup>5</sup>Saez, Felipe, "Corruption, Institutional Performance and Governance: Developing an Anti-corruption Strategy for Colombia" in Giugale, Marcelo, Lafourcade, Olivier, and Luff, Connie, *Colombia: The Economic Foundations of Peace*, World Bank Publications, Washington D.C., 2002, pp. 931-955

<sup>6</sup>Corporación Transparencia por Colombia, *National Integrity System, Country Study Report, Colombia 2001*, [www.transparency.org/content/download/1641/8344/file/colombia.pdf](http://www.transparency.org/content/download/1641/8344/file/colombia.pdf)

<sup>7</sup>See "Combating Corruption: A Private Sector Approach," CIPE Reform Toolkit, March 2008, <http://www.cipe.org/publications/papers/pdf/Anti-CorruptionToolkit0308.pdf>

<sup>8</sup>Such as the contracting of health services; contracts that in open tenders were declared deserted; in the sale of state-owned goods; in the purchasing of goods and services required in defense and national security (except those identified as strategic), etc.

<sup>9</sup>See Transparencia por Colombia, "Mejores Leyes son Necesarias, Pero no Suficientes," in *Economía Colombiana*, No. 321, Oct 2006, <http://www.transparenciacolombia.org.co/Portals/0/Publicaciones/Artículo%20Economía%20Colombiana%20PDF.pdf>

<sup>10</sup>See Sullivan, John, Center for International Private Enterprise, "Anti-corruption Initiatives from a Business Viewpoint," 2001, <http://www.cipe.org/pdf/publications/fs/initiatives.pdf>

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*The Colombian Confederation of Chambers of Commerce (Confecámaras) is a Colombian private organization that supports private-public sector cooperation. It was founded in 1969 at the initiative of local chambers of commerce in the country and represents business interests on the national level. Confecámaras also provides research and consulting*

*assistance to the business community, and coordinates training and institutional support for the organizations under its umbrella. Since 1999, CIPE has worked with Confecámaras on a variety of issues, notably corporate governance reform and anti-corruption initiatives.*

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