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Financial Management Deficiencies in Brazil's National Affordable Housing Program (PMCMV): Lessons from Brazilian Federal Court of Accounts

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Abstract: This article analyzes financial management deficiencies in Brazil's "Minha Casa, Minha Vida" (PMCMV) program, based on the 2024 audit by the Brazilian Federal Court of Accounts (TCU). The PMCMV, launched in 2009 to reduce the housing deficit and stimulate the economy, had delivered millions of housing units by 2023. The TCU's audit revealed substantial discrepancies in financial data, a lack of transparency, and incipient monitoring and evaluation mechanisms. Issues of institutional coordination and role clarity among the involved entities were also identified. The study, employing a qualitative case study approach, draws upon TCU's Decision No. 1100/2024. The findings underscore the necessity of integrated financial systems, proactive transparency, and robust monitoring to enhance accountability in social programs. The article concludes that effective accountability is crucial for the efficient use of public resources and the overall success of large-scale social initiatives.

Keywords: Federal Court of Accounts; Financial Management; Minha Casa, Minha Vida Program; Transparency.

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Deficiências na Gestão Financeira do Programa Nacional de Habitação Acessível do Brasil (PMCMV): Lições do Tribunal de Contas da União

Resumo: Este artigo analisa as deficiências de gestão financeira no Programa Minha Casa, Minha Vida (PMCMV) do Brasil, com base na auditoria de 2024 do Tribunal de Contas da União (TCU). O PMCMV, lançado em 2009 para reduzir o déficit habitacional e estimular a economia, entregou milhões de moradias até 2023. A auditoria do TCU revelou discrepâncias substanciais em dados financeiros, falta de transparência e mecanismos incipientes de monitoramento e avaliação. Também foram identificados problemas de coordenação institucional e clareza de papéis entre as entidades envolvidas. O estudo, utilizando uma abordagem de estudo de caso qualitativo, baseia-se na Decisão nº 1100/2024 do TCU. As descobertas enfatizam a necessidade de sistemas financeiros integrados, transparência proativa e monitoramento robusto para aprimorar a responsabilidade em programas sociais. O artigo conclui que a prestação de contas eficaz é crucial para o uso eficiente dos recursos públicos e para o sucesso de iniciativas sociais em larga escala.

Palavras-chave:: Tribunal de Contas da União; Gestão Financeira; Programa Minha Casa, Minha Vida; Transparência.

Introduction

Brazil's "Programa Minha Casa, Minha Vida" (PMCMV) is one of the largest social housing initiatives in the country's history, launched in 2009 with the dual aims of reducing the housing deficit and stimulating the economy (BRASIL, 2009). Over its lifespan, the program has delivered millions of housing units to low-income families – more than six million homes by 2023, according to the Ministry of Cities (BRASIL, 2023). As with any large-scale public program involving substantial public funds, ensuring accountability, transparency, and effective use of resources has been a critical concern. In Brazil's public administration context, the Federal Court of Accounts (Tribunal de Contas da União – TCU) plays a central role in safeguarding these principles, acting as the supreme audit institution responsible for external control of federal programs.

In June 2024, the TCU conducted a comprehensive audit – effectively a spending review – of the PMCMV's financial management and results, culminating in Decision No. 1100/2024 (Acórdão 1100/2024) (TCU, 2024a). This decision and its supporting technical report provide a detailed case study of the program's performance and accountability issues. They highlight various financial irregularities, oversight gaps, and areas for improvement in governance of the housing initiative (TCU, 2024b). The findings also led the TCU to issue a series of recommendations aimed at strengthening financial controls, transparency, and monitoring of the program (ATRICON, 2016).

This article examines the PMCMV through the lens of that TCU spending review, drawing out accountability lessons for public administration. We integrate a policy analysis approach that considers not only the financial and legal compliance aspects identified by the audit, but also the broader implications for program effectiveness and public accountability. We begin with a review of relevant literature on spending reviews, accountability in public programs, and prior evaluations of the PMCMV.

Next, we outline the methodology for our case-based analysis. We then present the results of the TCU audit and decision, followed by a discussion interpreting these findings in context – including comparative insights and implications for policymakers. Finally, we conclude with key lessons and recommendations, emphasizing how improved accountability mechanisms can enhance the success of large social programs like PMCMV.

Accountability in Public Programs and Spending Reviews

Modern public administration places strong emphasis on accountability and results-based management, especially under the influence of New Public Management (NPM) reforms (Hood, 1991; Osborne; Gaebler, 1992). Supreme Audit Institutions (SAIs) like Brazil's TCU have expanded their role beyond traditional legality and financial compliance audits to include performance audits that evaluate efficiency and effectiveness of government programs (Pollitt et al., 1999; Lonsdale, 2000). Traditionally, Brazil's accountability model – following the Napoleonic court of accounts system – focused on legal compliance, with auditors acting in a quasi-judicial capacity to ensure expenditures obey the law (Loureiro et al., 2009).

However, contemporary practice increasingly integrates performance considerations, meaning audits not only check if money was spent legally, but also if it achieved intended outcomes. A spending review, in international terms, is a process by which governments reassess expenditures to improve efficiency and reallocate resources according to priorities (Robinson, 2013). Originating in countries like the United Kingdom and gradually adopted elsewhere, spending reviews set firm spending limits and demand evidence of results for the money spent (HM Treasury, 2010; Robinson, 2013). In the Brazilian context, while the term "spending review" is not formally used in budgetary law, the practice of comprehensive audits and evaluations by oversight bodies serves a similar purpose: scrutinizing programs to ensure public funds deliver value and align with policy objectives.

The Role of the TCU in Policy Oversight

The TCU, as an external control body, provides a critical accountability mechanism for federal programs. It has constitutional authority to audit and assess the management of public resources, issue recommendations, and in some cases impose sanctions or determinations for corrective action. According to Brazil's legal framework, TCU decisions (acórdãos) can direct agencies to take remedial measures and recommend improvements pursuant to its audit findings (BRASIL, 1988; TCU, 2024a). This oversight contributes to what scholars describe as horizontal accountability – state institutions holding each other accountable – complementing vertical accountability through elections and social accountability via citizen participation (O'Donnell, 1998; PERUZZOTTI; SMULOVITZ, 2006).

Research on the TCU's evolving role suggests that it increasingly engages in evaluating public policy results, aligning with international trends to enhance government performance (e.g., via operational audits and program evaluations) (Loureiro et al., 2009; Speck, 2011). By doing so, the TCU can influence policy implementation, a phenomenon sometimes termed "policy audit" or "audit activism," where audit institutions drive improvements in public administration (Gendron et al., 2007; MORIN, 2008).

However, this expanded role must balance between respecting managerial discretion and enforcing standards – a nuanced issue noted in the literature on audit institutions' influence on policymaking (Pollitt et al., 1999; Lonsdale, 2000).

Overview of the PMCMV Program

PMCMV was launched in 2009 as Brazil's flagship housing program to address the severe housing deficit and simultaneously act as an economic stimulus in the wake of the 2008 financial crisis (BRASIL, 2009). The program provides subsidized housing and lowinterest financing to low- and middle-income households, segmented into income-based "faixas" (tiers), with the lowest-income beneficiaries receiving the highest subsidies or free housing units. In its first decade, PMCMV had significant reach – by 2019 it was reported to have benefited around 5.5 million families (Krause et al., 2013). The program initially set a goal of building 1 million homes in its first phase and later expanded targets in subsequent phases (BRASIL, 2009).

Literature on PMCMV has scrutinized various aspects of its design and implementation. Studies have highlighted successes, such as the sheer scale of housing delivery and increased home ownership among the poor, but also pitfalls impacting accountability and effectiveness. Key issues include: the peripheral location of many housing developments leading to social and urban challenges (distance from jobs and services) (Cardoso et al., 2013); variability in construction quality; and instances of beneficiaries leaving or selling the units (despite rules against resale prior to full payment) (Ferreira, 2012).

For example, earlier audits and evaluations found that some PMCMV projects suffered from construction defects and inadequate infrastructure integration, although fundamental habitability was generally met (TCU, 2016a; TCU, 2016b). Additionally, delays in allocating beneficiaries to completed units led to problems like invasions or vandalism of vacant houses (TCU, 2016c), prompting recommendations to change the process of beneficiary selection timing (TCU, 2016c). The lack of formal property titles in some cases, and beneficiaries not being fully informed of restrictions, resulted in illegal sales or rentals of subsidized units (Ferreira, 2012) – a clear failure in enforcing program rules and ensuring legal accountability at the end-user level.

Accountability relations in social housing programs are complex, involving multiple actors and levels of government. A comparative legal analysis by Vilmondes (2022) of Brazil's PMCMV and Chile's housing programs notes that Brazil's model relied heavily on federal coordination with financial agents (state-owned banks) for implementation, which created challenges in oversight and clarity of responsibilities (e.g. between the Ministry of Cities, state banks, and municipal governments) (Vilmondes, 2022). The PMCMV's legal framework (Law 11.977/2009 and later amendments) established general rules, but operational details often came via regulations and contracts with banks, leaving some gaps in standardization. Ensuring accountability thus required not only legal provisions but active monitoring and control mechanisms throughout execution.

Prior Audits and Evaluations of PMCMV

The 2024 TCU audit is not the first time the program's accountability has been examined. Notably, the TCU performed earlier audits – for instance in 2015 as part of an international coordinated audit with other Latin American countries under OLACEFS (ATRICON, 2016), and in 2014–2015 focusing on the sub-program for smaller municipalities (PMCMV Sub-50) (TCU, 2015). These audits uncovered significant shortcomings. In the PMCMV Sub-50 audit, TCU found that the program was "not achieving its purpose," citing insufficient regulation, lack of oversight by the Ministry of Cities, and serious delays in corrective actions (TCU, 2015; ATRICON, 2016).

It documented cases of poor construction quality (houses delivered without proper finishing or utility hookups) due to absence of minimum standards and inspections (TCU, 2015; TCU, 2016a). Moreover, the Ministry had been transferring funds to executing agents without adequate supervision of how projects were executed (TCU, 2015). The TCU concluded that the Ministry's tardy response (only reacting after media denunciations) represented a failure of managerial accountability (TCU, 2015; ATRICON, 2016). In that case, the TCU imposed fines on officials despite partially accepting their justifications, underlining that accountability was enforced via sanctions when lapses were severe (TCU, 2015).

Another TCU operational audit (reported in 2016) focusing on the urban component (FAR-funded projects) found that only 46% of the planned housing units for 2012–2015 were actually delivered, with particularly shortfalls in capital cities due to land scarcity (TCU, 2016b; TCU, 2016c). The TCU recommended policy shifts like investing more in urbanized slum upgrading where new construction was constrained (TCU, 2016c). That audit also identified recurring construction issues (e.g., non-structural cracks, poor paint and fixtures), though not gravely compromising habitability (TCU, 2016a), and it prompted immediate corrections by the banks overseeing construction (TCU, 2016b).

Furthermore, to curb misallocation and misuse, the TCU recommended changes such as earlier identification of beneficiaries (to allow social work and avoid empty units) (TCU, 2016c) and measures to prevent illegal sales (including better beneficiary education on the rules and potential sanctions) (Ferreira, 2012). These recommendations highlight the broad scope of accountability in PMCMV: financial regularity, performance to targets, quality standards, and proper use of the housing by intended beneficiaries.

Literature Review Summary

The literature and prior evaluations set the stage for understanding Decision 1100/2024. They reveal that PMCMV's challenges are not only financial but also institutional and social: from budget execution irregularities to transparency deficits and enforcement of program rules. The TCU's 2024 audit builds on this context, zeroing in on financial management and oversight systems. In the next sections, we detail the methodology for analyzing this audit and then present the findings of Decision 1100/2024, interpreting their significance for improving accountability in public programs.

Methodology

This research adopts a qualitative case study approach, centered on the TCU's Decision 1100/2024 as the primary case of an accountability review in public administration. Our analysis is based on documentary research – we collected and examined official documents and reports related to the TCU audit of PMCMV, including the published Acórdão 1100/2024 (the decision text) and the technical instruction report that underpinned the decision (TCU, 2024a). The Acórdão provides the formal outcome (recommendations and conclusions) of the audit, while the technical report (prepared by the TCU's audit staff) contains detailed findings, evidence, and analysis of the program's performance and financial management.

In addition, we gathered secondary sources to enrich the context and provide comparative perspectives. These sources include news articles (for example, coverage of the TCU audit by media) (Gazeta do Povo, 2024), prior TCU press releases on earlier PMCMV audits (TCU, 2024c; ATRICON, 2016), and academic or policy literature on housing programs and public sector accountability. The literature review was used to frame the analysis within broader theoretical and practical insights, ensuring that the case study findings are connected to existing knowledge on accountability and spending reviews.

The analysis followed a thematic approach, where we identified key patterns and themes in the audit findings, categorizing them according to different dimensions of accountability (financial, transparency, performance, institutional). We also applied a comparative lens, relating the findings to international experiences with spending reviews and accountability in social programs. This methodology allows us not only to document what the TCU audit found, but also to interpret these discoveries within a broader context of accountability theory and practice.

Results: Findings From TCU Decision 1100/2024

Audit Context

The TCU audit that resulted in Decision 1100/2024 was conducted between 2023 and 2024, focusing specifically on PMCMV's financial management and control mechanisms implemented by responsible agencies (TCU, 2024a). The audit was motivated by concerns about financial transparency, effectiveness of internal controls, and the need to assess whether substantial public resources allocated to the program were being managed adequately. The audit scope included analysis of financial data from 2019 to 2023, examination of internal control processes, and evaluation of monitoring and reporting systems implemented by the Ministry of Regional Development (formerly Ministry of Cities) and Caixa Econômica Federal, the program's main financial agent.

Key Financial Findings

One of the most significant audit findings was the identification of substantial discrepancies in financial data reported by different agencies involved in PMCMV (TCU, 2024b). The audit revealed inconsistencies between amounts reported by the Ministry of Regional Development and those recorded by Caixa Econômica Federal, with differences reaching billions of reais in some fiscal years. Specifically, while the Ministry reported transfers of R$ 1.2 billion to Banco do Brasil in a certain period, the bank's records indicated receipt of R$ 37.8 billion, a discrepancy that raised serious questions about the reliability of financial information systems (TCU, 2024b).

These inconsistencies were attributed primarily to the lack of adequate segregation of PMCMV accounts from other housing programs, resulting in difficulties to precisely track resources specifically destined for the program. The audit also identified deficiencies in internal control systems, including the absence of regular reconciliations between different financial information systems used by involved agencies.

Transparency and Accountability Issues

The audit highlighted significant deficiencies in PMCMV's transparency and accountability (TCU, 2024b). The absence of regular and standardized reports on the program's financial performance was identified, hindering both internal and external control. The lack of updated public information on project execution and post-occupancy results was pointed out as an obstacle to social accountability, limiting the capacity of citizens, media, and civil society to monitor the program.

Furthermore, the audit found that stakeholder communication mechanisms were inadequate, with limited feedback from beneficiaries, municipalities, and other partners on program implementation. This lack of effective communication channels was seen as an impediment both to continuous program improvement and to responsiveness to local needs and beneficiary concerns.

Deficiencies in Monitoring and Evaluation

A critical audit finding was the identification of "incipient" monitoring and evaluation mechanisms in PMCMV (TCU, 2024b). The audit revealed that the program lacked clear performance indicators and robust systems for tracking results. This deficiency meant that issues like construction defects, unoccupied units, or beneficiary dissatisfaction only came to light sporadically, through press reports or ad-hoc audits, rather than being systematically tracked and addressed.

The absence of an integrated monitoring system also hindered early identification of problems and implementation of timely corrective measures. The audit noted that this gap in monitoring and evaluation prevented a learning-based accountability approach, where program managers would be responsible not only for spending correctly but for achieving and demonstrating results, and for using data to improve operations.

Institutional Coordination and Role Clarity

The audit also identified issues related to institutional coordination and role clarity among different agencies involved in PMCMV (TCU, 2024b). The discrepancies in financial data and overlap between programs (PMCMV versus PAR - Residential Leasing Program) suggested that coordination was suboptimal. The audit questioned who was ultimately responsible for program results – the Ministry, the bank, or both – indicating the need for clearer governance structures.

This confusion of roles was seen as a contributing factor to many of the identified problems, including deficiencies in financial control and monitoring. The audit suggested that large programs implemented through multiple entities need clear governance structures and integrated information systems to ensure effective accountability.

Discussion

Accountability Lessons for Public Programs

The findings from Decision 1100/2024 offer several important lessons about accountability in large-scale public programs. First, the issue of financial data discrepancies illustrates how poor data governance can undercut transparency. In an accountable system, different parts of the government should ideally be working off the same data truth. When the left hand (Ministry) and right hand (bank) have wildly different accounts, it becomes impossible for external observers – be it TCU, Congress, or citizens – to know what to believe.

This situation not only hampers oversight but can breed public mistrust. For instance, if the public were aware that one source says R$1.2 billion was given to Banco do Brasil but the bank says R$37.8 billion, it would naturally raise suspicions of mismanagement or worse, even if the cause is mundane miscommunication. The TCU's solution via recommendations is instructive: enforce segregated accounting and reporting by program (TCU, 2024a) and implement integrated financial information systems (TCU, 2024a).

Transparency by Design

By segregating PMCMV's accounts from other programs and requiring annual cost reporting per program, the TCU is pushing for a level of granularity and clarity that would make inconsistencies immediately apparent and traceable. It's a push towards transparency by design – structural changes in how information is recorded and disclosed so that oversight is built into the process, not an afterthought. In effect, this aligns with international best practices where governments publish program-level expenditures and performance metrics, enabling both auditors and the public to hold them accountable (comparable to how the UK's spending reviews tie funding to specific targets and measure improvements expected from that spending) (HM Treasury, 2010).

Another aspect of transparency is public communication and social accountability. The audit noted the lack of public information on project execution and post-occupancy results (TCU, 2024b). Without transparency, social control – the ability of citizens, media, and civil society to scrutinize and participate – is limited. The recommendation for SNH to have planned communication with stakeholders and timely feedback loops implicitly acknowledges this. It suggests that PMCMV management should not operate in a silo; rather, they should regularly communicate progress and listen to feedback (e.g., complaints from residents about construction issues, or input from municipalities on local needs).

Monitoring and Evaluation – Accountability for Results

A major lesson is the need to institutionalize M&E in social programs. The audit's finding of "incipient" evaluation mechanisms confirms what many analysts had suspected: PMCMV, in its rush to deliver units, did not invest enough in measuring outcomes and refining the program over time (TCU, 2024b). This reflects a broader challenge in public administration – balancing the pressure for quick results with the need for thoughtful evaluation.

The lack of clear performance indicators and continuous monitoring meant that issues like construction defects, unoccupied units, or beneficiary dissatisfaction might only come to light sporadically (for example, via press reports or ad-hoc audits) rather than being systematically tracked and addressed. The accountability lesson here is that accountability is not just about catching wrongdoing; it's also about learning and improving.

By recommending robust monitoring with KPIs and feedback loops (TCU, 2024a), the TCU is effectively advocating for a learning accountability approach – where the program managers are accountable not only for spending correctly but for achieving and demonstrating results, and for using data to improve operations. This complements the concept of spending reviews internationally, where governments ask not just "was the money spent as appropriated?" but "what are we getting for the money, and could it be better spent?" (Robinson, 2013).

Institutional Coordination and Role Clarification

The issues identified also shed light on institutional accountability – i.e., clarity of roles between the Ministry, Caixa, Treasury, etc. The confusion in financial figures and overlapping programs (PMCMV vs PAR) suggest that coordination was suboptimal (TCU, 2024b). One lesson is that large programs implemented across multiple entities need clear governance structures. Who is ultimately accountable for the program's outcomes – the Ministry or the bank or both?

The audit lists specific individuals (former ministers and officials) as responsible parties, indicating that personal accountability was considered (TCU, 2024a). However, the remedy was recommendations, not fines or formal culpability, implying that the problems were systemic rather than pinpointed as misconduct by certain individuals. This raises a point about accountability systems design: if everyone is responsible, perhaps no one is truly accountable.

In PMCMV, the Ministry of Cities (or equivalent) sets policy, Caixa executes financing and contracting, and municipalities often select beneficiaries and provide infrastructure. Such a web can dilute accountability unless roles are well-defined and information flows freely. The TCU's recommendations essentially demand each actor to step up in their domain – the Ministry on oversight and reporting, Caixa on accounting transparency, the housing secretariat on monitoring results.

Sustaining Social Objectives while Ensuring Accountability

A subtle but important point is that heavy accountability measures should not stifle the social objectives of a program. The TCU audit was sensitive to context – it primarily issued recommendations rather than harsh sanctions, recognizing that PMCMV's challenges were in many cases due to rapid scaling and perhaps ad-hoc adjustments made under budget constraints. The recommendations seek to bolster the program (make it more resilient and transparent), not to impede it.

For example, requiring better cost estimation will help avoid abrupt funding shortfalls that have in the past stalled construction, thus protecting beneficiaries from half-finished projects (TCU, 2024a). Enforcing segregation of funds ensures that money intended for low-income housing isn't inadvertently used elsewhere, thereby guarding the poor's resources.

At the same time, the discussion around illegal sales of units and beneficiary selection shows another angle of accountability: the beneficiaries' compliance with program rules. Earlier audits recommended the Ministry to take measures against beneficiaries who sell or rent out subsidized homes before the term (Ferreira, 2012).

This is a form of accountability at the user level – ensuring the policy's intent (to provide housing to those in need) isn't subverted for profit.

While Decision 1100/2024 did not directly address this issue (as it focused on financial management), it is part of the broader accountability lesson: effective program design must include mechanisms to prevent and detect misuse at all levels, from program managers to end beneficiaries.

Results

The analysis of TCU Decision 1100/2024 on the Minha Casa, Minha Vida Program offers valuable insights into the challenges and opportunities for strengthening accountability in large-scale social programs in Brazil. The audit findings reveal that, while PMCMV has achieved notable successes in delivering housing to millions of Brazilian families, significant deficiencies in financial management, transparency, and monitoring have compromised its accountability and potential effectiveness.

The main lessons drawn from this analysis include the critical importance of integrated financial information systems, the need for transparency by design in public programs, and the value of robust monitoring and evaluation mechanisms that enable learning and continuous improvement. The PMCMV experience demonstrates that effective accountability requires not only legal and financial compliance, but also institutional clarity, coordination among multiple actors, and responsiveness to beneficiary and stakeholder needs.

Implications for Brazilian Public Administration

The findings of this analysis have broader implications for Brazilian public administration and the role of control institutions like the TCU. The approach adopted in

Decision 1100/2024 – focusing on constructive recommendations rather than punitive sanctions – suggests an evolution toward a more learning-oriented accountability model focused on continuous improvement.

This evolution aligns with international trends where supreme audit institutions expand their role beyond traditional legality control to include performance and effectiveness evaluations. In the Brazilian context, this represents an opportunity for the TCU to continue developing its capacity to contribute not only to detecting irregularities, but to improving public management and enhancing results for citizens.

Recommendations

Based on the findings and analysis presented, we offer the following recommendations for strengthening accountability in similar social programs:

1. Implementation of Integrated Financial Management Systems: Programs involving multiple institutions should establish from the outset integrated and standardized financial information systems, with regular reconciliations and segregated reporting by program.

2. Proactive Transparency and Stakeholder Communication: Develop systematic mechanisms for public communication about program progress, including transparency portals updated regularly and feedback channels with beneficiaries and local partners.

3. Institutionalization of Monitoring and Evaluation: Establish from program design clear performance indicators, data collection systems, and regular evaluation processes that allow evidence-based adjustments and improvements.

4. Clarification of Roles and Responsibilities: Clearly define the responsibilities of each institution involved in implementation, establishing responsibility matrices and effective coordination mechanisms.

5. Balance between Accountability and Social Objectives: Develop accountability approaches that strengthen program effectiveness without creating excessive bureaucratic obstacles that might harm service delivery to beneficiaries.

Final Considerations

The Minha Casa, Minha Vida Program represents one of the largest social policy efforts in Brazil's recent history, with significant impacts on the lives of millions of families. The analysis of the TCU audit demonstrates that even well-intentioned and far-reaching programs can benefit substantially from more robust accountability mechanisms.

The lessons drawn from this experience are relevant not only for improving PMCMV itself, but for the design and implementation of future social programs in Brazil and other countries with similar challenges. Effective accountability is not an obstacle to the success of social programs, but rather an essential element to ensure that public resources are used efficiently and effectively in pursuing important social objectives.

The path to more accountable public administration requires continuous efforts from multiple actors – from public managers and control institutions to citizens and civil society organizations. The PMCMV experience, viewed through the lens of the TCU audit, offers a valuable map for this journey, highlighting both the challenges and opportunities for building public governance systems that are more transparent, effective, and responsive to society's needs.

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