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Covid-19:
Public Policies and Society's Responses

Quality information for refining public policies and saving lives

> ### Policy Brief No. 25
> Brazil's largest capital, the city of São Paulo, continues to register High COVID-19 Risk Levels. Mitigation measures were moderate and enforcement was limited.

   This extra policy brief of the Solidarity Research network is directed at evaluating the pandemic in Sao Paulo, Brazil's most important capital. As the Solidarity Research Network continues to expand its research agenda, the Solidarity Research Network continues to advance its mission aimed at identifying the challenges that affect Brazil´s ability to effectively combat COVID-19 with the aim of saving lives. As a multidisciplinary research initiative bringing together faculty and researchers concerned with providing information, data, indicators and evidence-based analyses, the Network continues to be concerned with the quality and the improvement of public policies at the federal, state and municipal levels directed at combatting COVID-19. The Network will sponsor a series of events, workshops, and seminars to advance its collaborations with policymakers and scholars at the national and international level. New studies on education, the environment, violence, diversity, sustainability, and climate will seek to reinforce the debates about the health system and the social assistance to the population, the changes in the economy and labor markets. The challenges posed by the search for employment, the need to strengthen the social safety net, and the longlasting need to diminish of inequalities that continue to break the cohesion of Brazilian society will continue to be at the forefront of our work, policy briefs, debates and events.

   Until soon,

   Coordination Team of the Solidarity Research Network

Main conclusions

- According to the classification of the Harvard Global Health Institute, the COVID-19 risk level in the state capital of São Paulo continues to be moderate-high. This level has persisted since the beginning of May.

- According to data from the São Paulo State Health Department (*Secretaria Estadual de Saúde in Portuguese*), there were 12,266 deaths from COVID-19 by September 17 in the state capital. However, data from the São Paulo Municipal Health Department (*Secretaria Municipal de Saúde in Portuguese*), the total number of COVID-19 deaths is substantially higher than the previous figure, with 19,033 deaths (13,244 confirmed deaths and 5,789 suspected deaths).

- Data regarding the place of residence of people who died from COVID-19 suggests that deaths do not occur equally high in all neighborhoods. The highest number of deaths were recorded in May in the subprefectures of Casa Verde, Parelheiros, Santo Amaro, Mooca, and Freguesia do Ó, where COVID-19 death rates per 100 thousand inhabitants varied between 50 and 59.9.

- Since the enactment of the São Paulo Plan, intending to organize the state's economic reopening, the capital has remained at intermediate levels of activity restrictions according to the state's classification.

- New data gathered by the Solidarity Research Network suggests that the effectiveness of the policies restricting economic activities and mobility during the pandemic were impaired by a lack of enforcement actions by city officials.

- The Solidarity Research Network also reveals data transparency and availability regarding the efforts directed at enforcement of violations of restrictive measures aimed at curbing the spread of COVID-19 are lacking. We only obtained monitoring data upon several requests to the subprefectures and the Municipal Subprefectures Secretariat; furthermore, the quality of the information hindered a detailed analysis of the city's enforcement strategy.

Introduction

Since the beginning of 2020, with the arrival and advance of the COVID-19 pandemic, state and municipal governments have organized themselves to adopt pandemic control measures throughout Brazil. This policy brief is dedicated to analyzing the municipality of São Paulo due to the intensity of the pandemic in the city. São Paulo is the city with the highest number of cases and deaths in the country throughout the entire pandemic, accounting for 453,512 cases and 20,107 confirmed and suspected deaths[1], and one of the country´s epicenters. Regarding COVID-19 deaths alone, the city of São Paulo accounts for approximately 8.7% of deaths in Brazil (13,134 of the 154,176 deaths in Brazil)[2] and over 50% of deaths in the state of São Paulo.

To discuss the situation in the country's largest capital, this policy brief analyzes the COVID-19 risk level index, an indicator of the severity of the pandemic based on the seven-day moving average of reported cases, in addition to the number of deaths reported by the Sao Paulo Municipal Health

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1 Covid-19 Daily Bulletin, nº 207, 10/20/2020. Available at https://www.prefeitura.sp.gov.br/cidade/secretarias/upload/saude/20201019_boletim_covid19_diario.pdf.

2 Official bulletin of the State of São Paulo – SP Against the New Coronavirus: Complete Bulletin. Accessed on 20/10/2020. Available at <https://www.seade.gov.br/coronavirus/?utm_source=portal&utm_medium=banner&utm_campaign=boletim-completo>.

Secretariat. Additionally, we evaluated the social distancing measures adopted in the municipality and compared them against the state-level measures. Lastly, we analyzed the measures for enforcing compliance with the rules established by these policies and the existence of sanctions in the event of transgression. We analyzed social distancing measures over the course of the last six months in the state and city of São Paulo. The monitoring data stem from data collected by the Solidary Research Network in the city from March 23 to September 8, 2020.

I. COVID-19 Risk Level in the Capital

The Solidarity Research Network has been using the COVID-19 risk level, as proposed by the Harvard Global Health Institute (HGHI), to analyze the evolution of the pandemic. The COVID-19 risk level index shows the severity of the epidemic in a given location and subsequently defines the necessary government efforts to respond to the situation. The HGHI risk level indicator is estimated by using the moving average of confirmed cases per 100 thousand inhabitants and is classified into four risk levels: high, moderate-high, moderate-low, and low (Table 1). The moving average corresponds to the average number of cases per 100 thousand inhabitants over 7 days, centered on the day in question, according to data from the São Paulo State Health Secretariat. We extracted the data from the database compiled by *Justen et al.* (2020) on the *Brasil.io* platform.

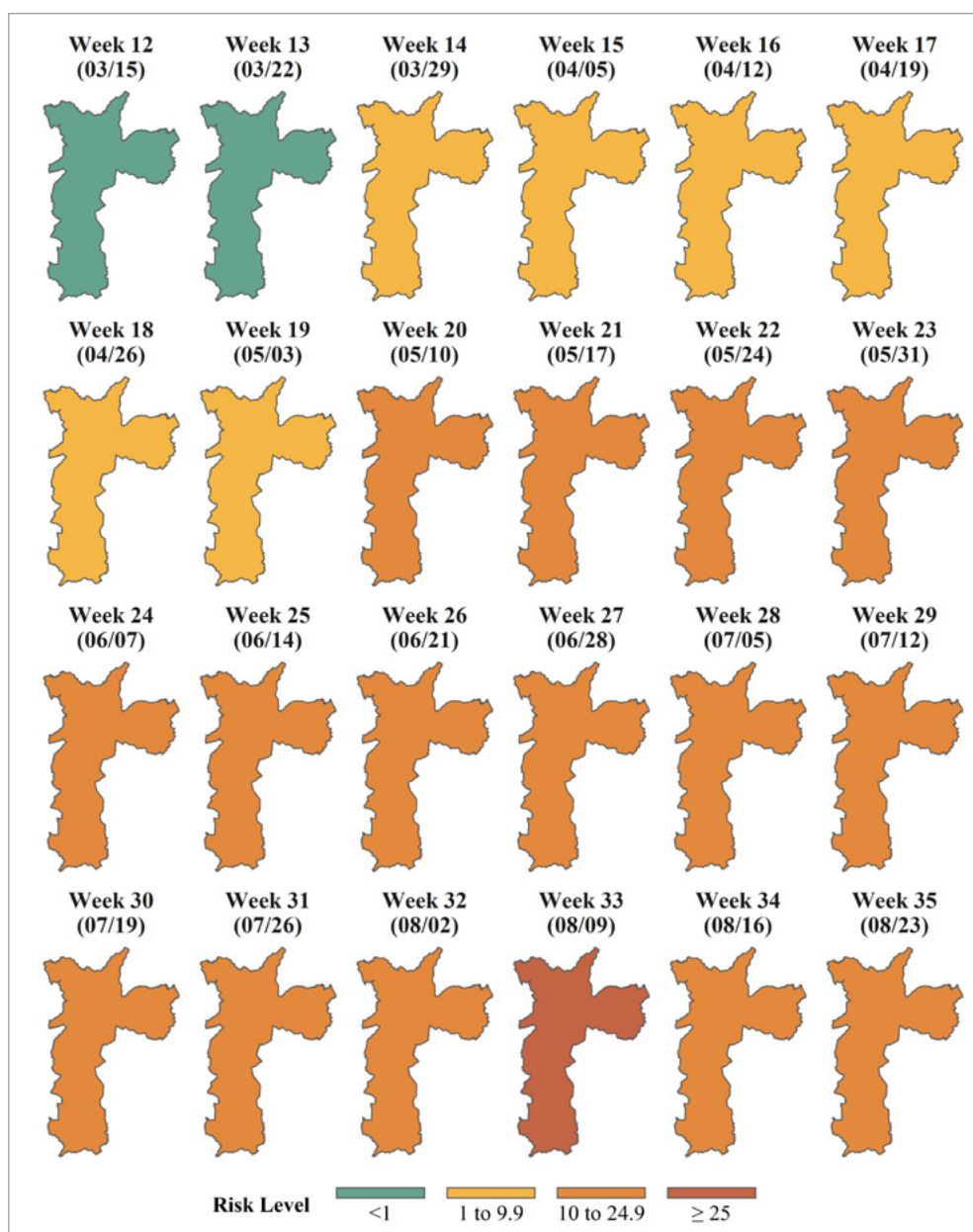**Table 1.** COVID-19 Risk Levels based on the Number of New Daily Cases

Classification	COVID Risk Level	Reference (Number of cases per 100.000 people)
Red	High	>25
Orange	Moderate-high	10<25
Yellow	Moderate-low	1<10
Green	Low	<1

Source: Adapted from the *Harvard Global Health Institute (HGHI).* (https://globalepidemics.org/key-metrics-for-covid-suppression). Risk levels based on the average of daily new cases per 100 thousand inhabitants in the last 7 days.

Given the difficulties in obtaining a time series from the São Paulo subprefectures for analyzing the COVID-19 risk level, we used the aggregated data for the city of São Paulo compiled in the Brasil.io database, based on data reported by the state health secretariat.[3] Figure 1, which presents the COVID-19 risk level from epidemiological weeks 12 (March 15) to 35 (August 23), shows that from epidemiological week 14, beginning March 29, the state capital first registered a moderate-low risk level, increasing to moderate-high in epidemiological week 20, on May 10. The highest risk level was in the week of August 9. In the remaining weeks of May, June, July, and August, the state capital of São Paulo remained at moderate-high risk.

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[3] We isolated the SMS/SP data accordingly: COVID-19 E-SUS-VE Flu Syndrome (SG) and COVID-19 severe acute respiratory failure (SRAG in the Portuguese acronym). Available at: <https://www.prefeitura.sp.gov.br/cidade/secretarias/saude/tabnet/>.

Figure 1. Location of the city of São Paulo and COVID-19 Risk Level in the city of São Paulo between epidemiological weeks 12 (March 15) and 35 (August 29), according to the seven-day moving average of new cases per 100 thousand inhabitants
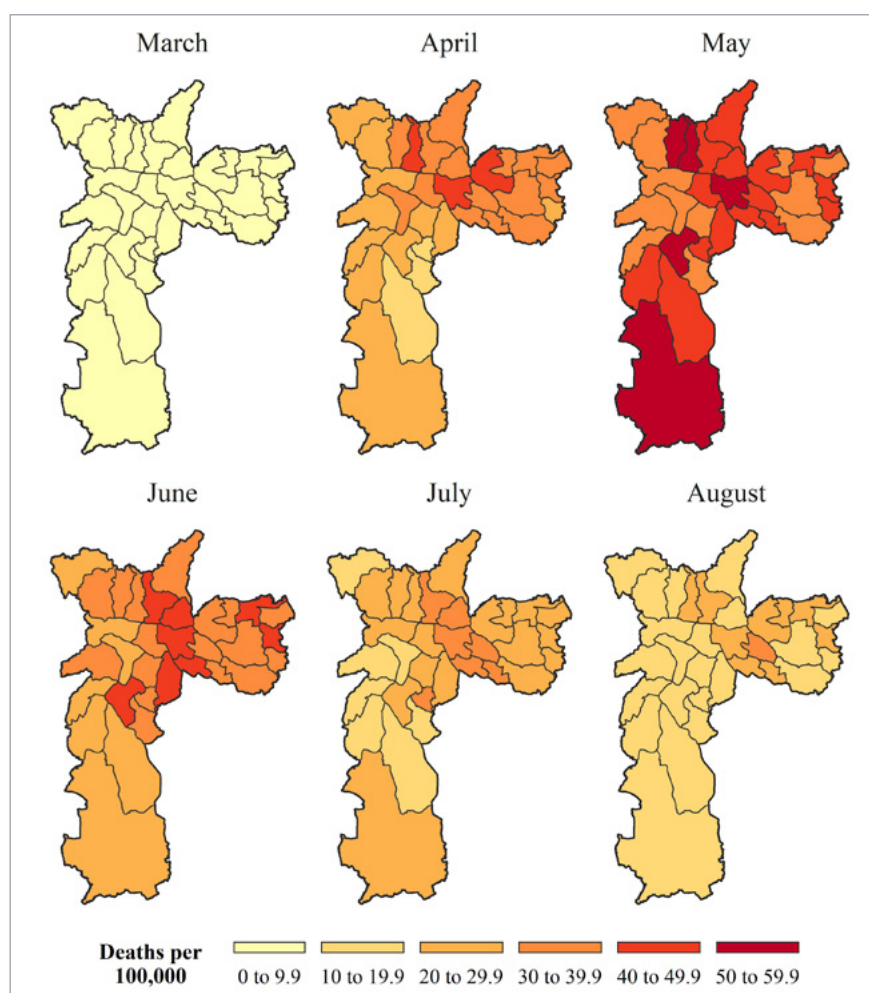

Source: COVID-19 risk level calculated by the authors using the HGHI methodology and data on cases per 100 thousand inhabitants for the capital (Justen *et al.* 2020).

The high COVID-19 risk levels since May 2020 have resulted in a steep mortality rate in the city of São Paulo. According to data from the State Health Secretariat, accumulated COVID-19 deaths totaled 12,266 in the capital until September 17. According to data from the São Paulo Municipal Secretariat[4], the death count by COVID-19 totaled 19,033 deaths (5,789 suspected deaths and 13,244 confirmed deaths). Although the data set provided by the city is provisional, the discrepancy between the numbers of deaths reinforces the understanding that the city's real pandemic situation depends on which data are considered.

Figure 2 shows the concentration of COVID-19 deaths per 100 thousand inhabitants in the São Paulo subprefectures. The highest values were recorded in May in the subprefectures Casa Verde, Parelheiros, Santo Amaro, Mooca, and Freguesia do Ó, where COVID-19 death rates per 100 thousand inhabitants varied between 50 and 59.9. Some individuals whose deaths occurred in the city whose death was not classified according to their location within a neighborhood in the city due to missing or unavailable information, and there are some who reside in other cities and perished in the capital.

Figure 2. Suspected and confirmed COVID-19 deaths (per 100 thousand inhabitants) per subprefecture in the city of São Paulo.

Source: Municipal Health Secretariat, SIM/PRO-AIM/CEInfoQSMS-SP, demographic data from the Municipal Subprefectures Secretariat and geospatial data from the GeoSampa portal of the city of São Paulo.

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[4] Municipal Health Secretariat, SIM/PRO-AIM/CEInfoQSMS-SP, data gathered on September 18, 2020. Available at: https://www.prefeitura.sp.gov.br/cidade/secretarias/upload/saude/20200918_boletim_covid19_diario.pdf.

II. The Pandemic Mitigation Strategy in São Paulo and the Role of Social Distancing Policies

As we have shown in previous policy briefs, social distancing measures are among a portfolio of measures that must be adopted against the COVID-19 pandemic. In Brazil, social distancing policies, assessed by the Solidarity Research Network through the Social Distancing Policy Stringency (SDPS) Index, were extremely variable regarding format, content, and coverage across states and municipalities. The abovementioned index measures the stringency level of policies for suspending or recommended closure of the following services and activities: a) schools and universities, b) commercial and services sectors, c) industries, d) crowding and, e) home isolation, in addition to the regulations regarding f) mandatory use of masks. For each government level (federal, state, and municipal-capital), the scores for each indicator were added and the index was re-scaled to a measure ranging from 0 (no stringency) to 100 (highest possible stringency).

The city of São Paulo registered a score of 0 until March 15 when, on this date, the state of São Paulo registered a score of 16[5]. Over the course of March, stringency increased for both the state and the capital city. The stringency level has evolved similarly at both government levels, which suggests collaborations between the state government and the city for developing strategies to fight the pandemic. In late March, the state of São Paulo registered a stringency score of approximately 38, while the city had a score of 33.

In short, both state and capital increased the stringency of social distancing measures during March, without, however, attaining satisfactory levels from the standpoint of the SDPS Index. These results relate not only to the areas covered by pandemic control measures, but mostly to the legislation in force, which allowed for the continuance of several activities involving crowding and recurrent in-person contact.

In the city of São Paulo, the first measures were enacted on March 16, 2020[6], twenty days after the first confirmed case of COVID-19 in the municipality. The new rules determined the closure of schools and establishments that could lead to large gatherings, such as museums, theaters, and general events. As the pandemic advanced, new measures were implemented in late March[7], incorporating other services and businesses to the list of closures, albeit without mentioning the cessation of the industrial sector.

As of the first fortnight of May, the use of masks in all public spaces in the city became mandatory[8], and a condition for admission to facilities authorized to operate. Despite an attempt to enact an expanded and more restrictive car rotation between May 11 and 17[9], in an attempt to reduce traffic and flow on urban roads, the state capital did not establish mandatory stay-at-home measures.

In May, the state of São Paulo registered a score of 51 on the SDPS index. In June, with the introduction of the São Paulo Plan, the scores reached 56 and the state had its most stringent performance over the course of July, with 61 points in the stringency index. In the state capital, lower scores were

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5 The state of São Paulo first registers a score of 16 as of March 13, 2020, when the first measures were introduced.
6 Decree nº 59.283 dated March 16, 2020.
7 Decree nº 59.298 dated March 23, 2020.
8 Decree nº 59.396 dated May 19, 2020.
9 Decree nº 59.403 dated May 7, 2020.

recorded in May, varying from 37.5 at the beginning of the month to 45.8. Akin to what we observed for the state, the scores increased in July, when the capital reached 50 points.The evolution patterns in stringency in the capital city and state suggests that, despite evidence of a substantial collaboration during the early months of the pandemic, the measures adopted at both government levels were disparate. The measures adopted in the capital were less stringent in all analyzed periods.

With the emergence of the São Paulo Plan in early June, stringency levels increased for the state and the capital. In mid-July, relaxation measures by the state government inaugurated a downward trend in stringency levels, which began at 50 and dropped to 34 in August. The capital maintained the index at 50 points during July and August. This may be explained by the fact that relaxation measures remained moderate in the capital: while some commercial and service businesses were allowed, according to the São Paulo Plan, others remained restricted, such as establishments with higher potential for crowding (cinemas, theaters, food buffets, music clubs, and similar facilities). Furthermore, with the *Protocolo Geral de Abertura,*[10] home isolation became mandatory for employees with suspected SARS-CoV-2 infection.

The stringency index began to decline in September, when the SDPS dropped to 38.8. We can partially attribute this outcome to the relaxation measures envisaged in the São Paulo Plan, which began to affect the city, when the closure indicator of commercial and service establishments reached 0 as the remaining economic sectors reopened – function halls, ballrooms, food buffets, music venues, nightclubs, or discotheques[11].

Table 2 compares the SDPS index, the COVID-19 risk level index of the Harvard Global Health Institute (HGHI), and the city's classification according to the São Paulo Plan. According to the HGHI criteria, the city of São Paulo has registered moderate/high-risk levels since May. Conversely, in the classification of the São Paulo Plan, the capital has been in the so-called Control phase, which led to the reopening of activities such as commercial centers and services contingent upon capacity constraints and sanitation measures. In June, the city further downgraded restriction to the so-called phase referred to as "Relaxation," which further reduced constraints for activities, in addition to including new sectors such as in-person consumption in restaurants and bars. The São Paulo Plan has promoted the reopening of several activities since June that could represent significant risks for the population. The 5 phases of the São Paulo Plan include: (1) Maximum alert; (2) Control; (3) Relaxation; (4) Partial Reopening; and (5) Controlled Normal. Social distancing measures are more stringent in Phase 1 and gradually decrease until Phase 5. We considered the last available update during epidemiological week 35. The first two updates were published on Wednesdays, the remaining on Friday. There were no updates in epidemiological weeks 23 and 33.

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10 Ordinance SGM nº 185. July 8, 2020.
11 Municipal decree 59.744, dated September 3, 2020.

Table 2. COVID-19 risk level according to the criteria of the Harvard Global Health Institute (HGHI), the classification given to the city of São Paulo by the State Government of São Paulo, and SDPS index score during epidemiological weeks 10 to 35
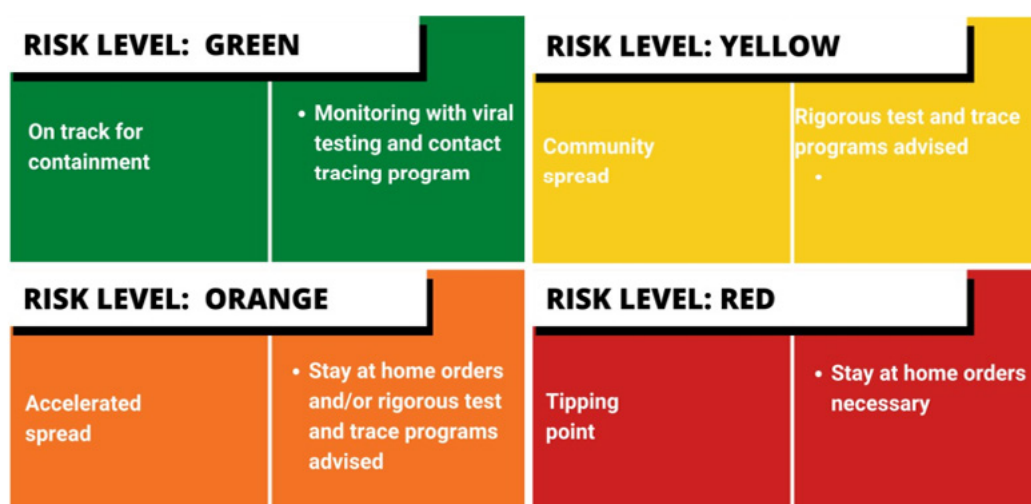
Epidemiological week	COVID-19 Risk		Social Distancing Policy Stringency Index (SDPS) (0-100)
	HGHI	Classification of the Capital according to the São Paulo Plan[12]	
10	Low	—	0
11	Low	—	0
12	Low	—	19
13	Low	—	30
14	Moderate-low	—	33
15	Moderate-low	—	33
16	Moderate-low	—	36
17	Moderate-low	—	38
18	Moderate-low	—	38
19	Moderate-low	—	44
20	Moderate-high	—	46
21	Moderate-high	—	46
22	Moderate-high	Phase 2 Control	46
23	Moderate-high	Phase 2 Control	46
24	Moderate-high	Phase 2 Control	46
25	Moderate-high	Phase 2 Control	46
26	Moderate-high	Phase 3 Relaxation	46
27	Moderate-high	Phase 3 Relaxation	46
28	Moderate-high	Phase 3 Relaxation	48
29	Moderate-high	Phase 3 Relaxation	50
30	Moderate-high	Phase 3 Relaxation	50
31	Moderate-high	Phase 3 Relaxation	50
32	Moderate-high	Phase 3 Relaxation	50
33	High	Phase 3 Relaxation	50
34	Moderate-high	Phase 3 Relaxation	50
35	Moderate-high	Phase 3 Relaxation	50

Sources: Harvard Global Health Institute and City of São Paulo (https://www.prefeitura.sp.gov.br/cidade/secretarias/saude/vigilancia_em_saude/index.php?p=295572).

In addition to establishing the COVID-19 risk classification guidelines, the Harvard Global Health Institute also suggests the optimal necessary measures for each COVID-19 risk scenario. Figure 3 summarizes the HGHI recommendations for each risk level. Locations at moderate-high risk level, such as the city of São Paulo, registered an accelerated spread of SARS-CoV-2 and, in this case, governments should adopt stay at home orders for the population and/or strict programs for testing infected people and tracing contacts. In places with high COVID-19 risk levels, as was the case for the city of São Paulo in the 33rd week, the situation is classified as critical and demands measures to restrict further the flow of people and stay at home orders for the population. Given that the capital maintained a moderate-high risk level in August since the 20th epidemiological week (except for the 33rd week), measures to control the pandemic should have focused on social distancing alongside the use of testing for identifying and isolating infected people and quarantining those with prior contact with infected people.

Figure 3. Harvard Global Health Institute Recommendations according to COVID-19 Risk Level.

Source: *Harvard Global Health Institute*, 2020.

III. The Enforcement of Social Distancing in the City of São Paulo

In this section, we report our findings regarding what enforcement actions were undertaken by the city of São Paulo to ensure compliance with the guidelines to contain the COVID-19 spread. In addition to informative and educational campaigns focused on raising awareness about the importance of complying with social distancing guidelines, the main strategy envisaged by authorities in view of the urgent need to comply with such rules was enforcement, which includes exercising state policing powers (Di Pietro, 2014) and the application of sanctions for those who disrespect such rules.

Most of the countries with enforcement strategies made use of an array of public strategies and policies, such as, for example, limiting the flow of people (lockdown) and national monitoring systems for surveilling the whole country, and not only specific cities – understanding that the virus would not

respect municipal boundaries. Italy is one such significant case, where on the first day of lockdown alone, 107,879 people were approached by the police and 2,164 were notified for not complying with lockdown rules. In a single day, 19,985 Italian establishments were inspected and 119 penalized[13]. In Argentina, between March 21 and 26, 201,913 people were stopped in monitoring activities related to the pandemic and 6,191 people were detained[14]. In a news story published in the newspaper Clarín[15], the local police confirmed that in Buenos Aires, between March 21 and 29, 2,044 people were approached for non-compliance with social distancing rules, from which 1,726 were prosecuted and 318 remained in detention at the time of the news story.

In the city of São Paulo, after three and a half months of policies directed at increasing social distancing, the economic recovery process in June sought to combine a gradual reopening with sanitary guidelines striving towards a safer return for the previously paralyzed activities. In reopening the city, enforcement is a way to ensure a safer return and reduces the risk of future mobility restrictions and business closures, as has happened in some places in Europe, such as Spain and the United Kingdom.

The Role of the São Paulo Subprefectures in Enforcement

Within the framework of social distancing measures, the city of São Paulo enacted decrees directed at tasking the subprefectures with enforcing compliance with business closure and restriction guidelines in cooperation with the Metropolitan Civil Guard (Guarda Civil Metropolitana). As for the use of masks in public spaces, state health agents and the police were identified as being responsible for monitoring compliance.

After the reopening plan was announced by the state of São Paulo (São Paulo Plan)[16] on May 29, the city gradually relaxed social distancing measures. On top of identifying additional sectors that would be allowed to operate, the city also published mandatory health protocols[17].Such protocols defined social distancing rules for internal and outdoor areas in commercial establishments to prevent crowding, and established mandatory hygiene and sanitation guidelines, such as appropriate cleaning of utensils and public areas. To monitor the guidelines and rules for reopening, the city implemented a procedure called *"Inspection and monitoring protocol for the sector (self-assessed),"* which assigned entities representing the economic sectors with the responsibility of promoting and supporting protocol measures.

Thus, based on the decrees enacted by the city of São Paulo,[18] the subprefectures were designated as being responsible for inspecting: (i) if establishments that provide non-essential commerce and services including wholesalers, retailers, street vendors, and service providers in the municipality suspended in-person servicing between March 24 and August 23, 2020 per the regulations in effect; (ii) if establishments that provide essential services offer masks and hand sanitizers or similar products for employees, collaborators, patrons, and consumers; (iii) whether establishments that provide

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13 Data from the Italian Ministry of Interior for March 11, 2020. Available at:<https://www.interno.gov.it/sites/default/files/modulistica/monitoraggio_dei_servizi_di_controllo_12.3.2020_0.pdf>

14 News published on the official website of the Argentine government of March 26, 2020. Available at: <https://www.argentina.gob.ar/noticias/mas-de-seis-mil-detenidos-y-casi-mil-vehiculos-secuestrados-en-los-controles-por-el>

15 News published by Clarín on March 29, 2020. Available at: <https://www.clarin.com/policiales/coronavirus-argentina-10-dias-33-mil-detenidos-incumplir-aislamiento_0_wEfS0kMQe.html>

16 Municipal Decree nº 59.473/2020 dated May 29, 2020.

17 Ordinances nº 625/2020, date June 9, nº 629/2020, dated June 10, nº 683/2020, date June 27, and nº 696/2020, dated July 4.
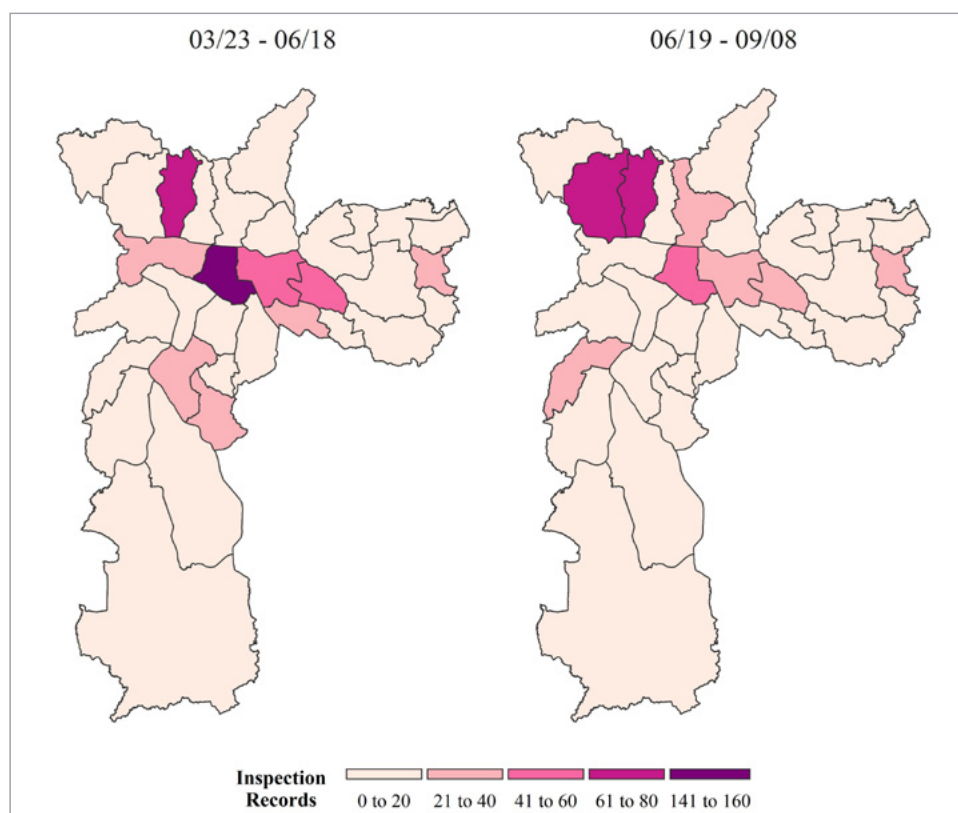
18 Decree nº 59.298/2020, articles 5 and 6 and Decree nº 59.396/2020, article 6.

essential services demand the use of protective masks for consumers to enter and remain inside the establishment; and, (iv) if bank branches and financial establishments, pharmacies, bakeries, supermarkets, and other establishments open to the general public reserve, at least, the first hour of their normal service hours for exclusively servicing people age 60 years or older.

On July 4, the city government authorized non-essential services to open up for in-person customer services (such as bars, restaurants, beauty salons, etc.)[19], With the new relaxation guidelines, the subprefectures had to include new activities within the scope of monitored sectors. Likewise, as the city of São Paulo advanced the reopening phases, and more establishments returned to operation, the subprefectures had to monitor additional places regarding their compliance with rules pertaining to curbing of the spread of the virus.

Given the lack of public and detailed data regarding enforcement actions, we sent out requests for information to city authorities and base our analysis in this brief on the data regarding citations for social distancing offenses in the city of São Paulo that were provided by city government officials. The subprefectures[20]. each provided this data from March 23 to June 18, and the MSS provided information for all regions within the city for the period between June 19 and September 8, 2020. The citation reports made by the government officials represents the capacity that the city had to identify health rule violations and punish offenders during the pandemic. Figure 4 illustrates the distribution of infraction notices in the subprefectures of the city of São Paulo.

Figure 4 - Infraction notices recorded in the subprefectures of the city of São Paulo
between March 23 and June 18, and between June 19 and September 8.

Source: Prepared from information provided by the Municipal Subprefectures Secretariat
upon our request by way of Law No. 12,527/2011 and geospatial data
from the GeoSampa online portal of the city of São Paulo.

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19 Ordinance nº 696, dated July 4, 2020 of the city of São Paulo.
20 We obtained the data by way of the Access to Information Law sent to each subprefecture of the city of São Paulo.

Considering the period between March 23 and June 18 (total of 88 days), 610 infraction notices were registered in the city of São Paulo regarding offenses to measures outlined above. This means that a sub-prefecture booked an average of 6.93 infraction notices per day. Therefore, the city was able to identify fewer than seven establishments per day in disagreement with social distancing rules. The subprefecture Sé is noteworthy, which alone was responsible for more than a quarter of the total number of infraction notices (157 notices in total during this period) – far ahead of the second-placed, the subprefecture Freguesia/Brasilândia, with half the track record of subprefecture Sé, with a total of 78 assessments during this period (less than one per day).

The subprefecture Jabaquara was the only subprefecture that failed to identify any violation liable for receiving a fine, and another 18 subprefectures identified, on average, less than one social distancing violation per week. They are: Cidade Tiradentes, Parelheiros, Pinheiros, Vila Mariana, Vila Maria/Vila Guilherme, Capela do Socorro, Ermelino Matarazzo, Ipiranga, Itaim Paulista, Santana/Tucuruvi, Butantã, Campo Limpo, Jaçanã/Tremembé, Penha, São Mateus, M´Boi Mirim, Pirituba/Jaraguá, and Itaquera. Among the 19 sub-prefectures with an average of lower than one infraction notice issued per week, 14 are in regions with the highest death tolls in the city of São Paulo, all of which registered over 300 deaths in the period. They are: Jaçanã/Tremembé, Itaim Paulista, Vila Maria/Vila Guilherme, Butantã, Santana/Tucuruvi, Pirituba/Jaraguá, São Mateus, Casa Verde/Cachoeirinha, Ipiranga, Capela do Socorro, Campo Limpo, M´Boi Mirim, Itaquera, and Penha.

Between June 19 and September 8, for a total of 82 days, the City registered a further 525 infraction notices. Therefore, the earlier phase pattern was repeated, with an average of 6.40 infraction notices per day. Even though more establishments were open during this period, the number of infractions did not increase. The average inspections dropped from 6.93 to 6.40 infraction notices per day. This drop in the absolute value of infraction notices in the city of São Paulo in July, August, and September denotes that enforcement decreased as restrictions mandating social distancing were enacted.

Equally noteworthy is the performance drop of subprefecture Sé, which identified only 46 infractions in the second period under analysis, when more establishments were in operation. Nonetheless, this subprefecture continues to be the most identified social distancing violations within the two analyzed periods. The subprefecture Itaim Paulista also stands out, which maintained the previously informed number and has not registered any infractions since June 18. The subprefecture Jabaquara did not register any infraction notice throughout the entire analyzed period. Some subprefectures increased by only one infraction notice during the more than two-month period following the first analyzed period (March 23 to June 18).

Responses from the 32 Subprefectures

We detail below some of the responses we received from the 32 subprefectures regarding enforcement and sanction activities of São Paulo's municipal decrees:

Lack of transparent data and data systems

In their first response, nineteen subprefectures told us that information regarding enforcement and application of sanctions was not available in a consolidated database or was not available. We submitted 19 appeals and finally received consolidated data from the MSS (Municipal Subprefectures Secretariat or Secretaria Municipal de Subprefeituras in Portuguese) under appeal. Besides, five subprefectures responded to our appeal, advising us to access the city's consolidated monitoring system and confirm the MSS's information.

Numerical contradictions

The Subprefecture of Ermelino Matarazzo, which reported having 12 monitoring agents (inspectors), replied that they were not required to issue violation notices during the enforcement period of the quarantine decrees. This information conflicts with the consolidated data provided by the MSS for that same subprefecture, which registered 3 infraction notices up until June 18. In an appeal requesting further clarification regarding the data discrepancy, the subprefecture corrected the information provided, confirming the MHS data. The sub-prefectures of Butantã and Campo Limpo also reported discrepant data; the latter, subsequently in appeals, also confirmed the data reported by the MSS, while the Butantã subprefecture continued to affirm that the required information did not constitute a database.

Lack of answers

The subprefectures of Cidade Ademar and Capela do Socorro informed that, due to the pandemic, they had restricted personnel for gathering the requested information, and the second subprefecture further demanded that we send any new requests through a letter to be sent to their physical address. Some subprefectures also declared insufficient inspection agents to report for data for the entire geographic coverage under their jurisdiction.

Jurisdiction conflicts

Seven subprefectures mentioned (both in response and in appeal) that the statistical control related to fines applied during enforcement procedures was the MSS's responsibility. This runs counter to the autonomy given to subprefectures by the MSS, further confirmed by the latter's response to our request for information. On the other hand, only one of the 32 subprefectures affirmed that the subprefecture is solely responsible for enforcing the decrees.

Incorrectly claiming that enforcement is not required

The Subprefectures of Casa Verde and Cachoeirinha, upon responding that they lacked further details due to the lack of a database, further indicated that "there was no need at all" to report enforcement actions statistically.

Lack of systematization

Apart from the responses not obtained at first appeal due to lack of personnel, at least 10 of the first appeal responses stated that they were undertaking enforcement inspections on the main roads, without detailing the district's inspection method in further detail by date, venue, or citations. Furthermore, in most neighborhoods, responses did not confirm that inspections were occurring on a regular, periodic basis.

Lack of data on detailed enforcement actions

No sub-prefecture disclosed operational details as stipulated as mandatory from agents involved in conducting inspections to contain the new coronavirus per article 6 of Decree 59.396/2020. In fact, five subprefectures indicated that no regulations were in effect, and one subprefecture mentioned that such enforcement was under the Municipal Subprefectures Secretariat's responsibility.

IV. Final Considerations and Recommendations

The HGHI risk classification has remained constant since May. The institute's recommendation for areas classified as moderate-high risk includes adopting policies to ensure that the population remains at home ("stay-at-home orders") and/or strict programs for testing infected people and tracing contacts. Considering the risk level attributed by the Harvard Global Health Institute (HGHI) criteria as applied to the city of São Paulo, which indicates a moderate-high level accelerated spread of SARS-CoV-2, social distancing measures should be reinforced.

The Solidarity Research Network discussed in several previous technical notes the importance and effectiveness of social distancing measures as a containment method for COVID-19 as part of a coherent response strategy. When consistent and coherent, these measures ensure the mitigation of infection points and, consequently, prevent the spread of COVID. When analyzing the measures undertaken by the capital as measured by the SDPS index, the Network has emphasized that the stringency levels of the measures implemented in the state of São Paulo and the state capital throughout the pandemic have been relatively moderate. Given that the maximum score is 100 and the highest score registered by the capital has been 50, there is evidence that these governments' mitigation policies do not agree with a higher COVID-19 risk level scenario in the analyzed weeks in this policy brief.

The findings presented in the policy brief underscore that the city of São Paulo must establish coordinated enforcement actions and guidelines for combating the coronavirus pandemic to safely resume its activities while preventing a return to higher stringency levels in social distancing rules. The goal of containing the spread of SARS-COV-2 and preserving lives remains of utmost priority.

Our research reveals that enforcement is lacking and below the minimum necessary levels. The city did not have a clear and coordinated plan for enforcement in the height of the pandemic when stricter social distancing rules were imposed in the early months of the pandemic or since policies were loosened in June up until September. On average, over half of the subprefectures (seventeen) registered less than one infraction notice per week, and another eight registered somewhere between one or two infraction notices per week during the entire analyzed period (March 23 to September 8).

The data suggest a lack of coordinated actions between the Municipal Subprefectures Secretariat and the Subprefectures, which, unaware of the geographic location of the most alarming COVID-19 death rates, continued to operate with absolute independence and within the possible material conditions for monitoring and enforcing social distancing rules. The city continued with a very low identification index of social distancing rule violations in regions with leading death rates. Regarding inspection efforts, we recommended that the city government should:

(i) organize enforcement policy for monitoring social distancing compliance in the city of São Paulo under the direction of the Municipal Subprefectures Secretariat as mandated by law;

(ii) ensure that all sub-municipalities have an adequate number of visiting agents (inspectors) trained to cover the entire territory of each sub-region and not just main roads;

(iii) maintain a public, transparent, updated, and organized database to inform the number of inspections performed, the types of social distancing violations detected, the number of registered infraction notices, the date of the infraction notices, the monetary value collected in fines, and the number of visiting agents in each subprefecture; and,

(iv) establish partnerships with agencies to provide support to subprefectures such that inspections to secure compliance with social distancing rules in the city of São Paulo can be attained.

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ABOUT

We are over 100 researchers, actively engaged in the task of improving the quality of public policies within federal, state, and municipal governments as they seek to act amidst the Covid-19 crisis to save lives. We dedicate our energies towards rigorous data collection, devising substantial information, formulating indicators, and elaborating models and analyses to monitor and identify pathways for public policies and review the responses presented by the population.

The Solidary Research Network has researchers from all scientific fields (Humanities as well as Exact and Biological Sciences) in Brazil and overseas. For us, the combination of skills and techniques is vital as we face the current pandemic. The challenge ahead is enormous, but it is particularly invigorating. And it would never have come to fruition if it weren't for the generous contribution of private institutions and donors who swiftly answered our calls. We are profoundly grateful to all those who support us.

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