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Gaps in the Standardization of Land Administration Services in Surabaya and Sidoarjo

Achmad Azmi Musyadad[1], Fatih Sabilul Islam[2]

[1,2]Ombudsman of the Republic of Indonesia, East Java Provincial Representative Office. Indonesia

Corresponding Author: achmad.musyadad@ombudsman.go.id[1]

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Abstract:
This study examines why legally required service standards do not consistently cover land-related administrative products in villages and urban wards in Surabaya and Sidoarjo, Indonesia. Using a comparative qualitative case study conducted in 2025, it analyzes interviews with officials, overt service observations, regulatory instruments, service decrees, consultation records, and complaint arrangements across nine units. The evidence reveals three different configurations: three Sidoarjo units lacked formally established standards; five Surabaya urban wards had general standards that omitted land products; and one Sidoarjo urban ward had a land-history standard whose public publication was not found during observation. The analysis distinguishes failures of formal adoption, product coverage, and implementation rather than treating all problems as an absence of standards. Differences in local documentary practices, divided guidance responsibilities, inconsistent online information, and limited complaint clarity create distinct institutional improvement needs. The proposed diagnostic framework links each gap with product inventories, legal authority reviews, participatory standard setting, information synchronization, and traceable oversight. Its relevance lies in clarifying how general public-service obligations reach specific land-related documents without confusing local statements with formal land title certificates. Because the nine sites were selected purposively and citizens were not interviewed, the study makes no causal claim about processing times, applicant satisfaction, or regional prevalence. It offers practical, evidence-bounded directions for differentiated supervision and subsequent assessment of service outcomes.

Keyword: Standardization, Land Administration, Public Service, Institutional Gaps

INTRODUCTION

Land statement letters, land tenure history statements, and territorial statements are forms of service that bring citizens into contact with village or urban ward governments in land-related matters. These documents can support subsequent administrative processes, although their legal standing differs from that of the land title certificates issued by the land agency. In issuing them, officials deal with local records,

knowledge of land histories, and responsibility for the statements they provide. Clarity regarding requirements and the limits of authority is important because a seemingly simple document may bear on the applicant's civil-law interests.

For this study, standardization is treated as a sequence of institutionally distinct decisions rather than a single signature on a decree. The first decision establishes whether a service unit has an approved standard at all. The second establishes whether the approved product list includes the land-related documents actually handled by frontline personnel. The third concerns whether the adopted standard is publicly intelligible, accessible, and used during an encounter with an applicant. This distinction matters because a ward may appear compliant in an administrative inventory while remaining unable to give a citizen reliable instructions about a particular land request (Adam & Maulida, 2024).

Land administration is an unusually consequential setting for analyzing these decisions. A statement prepared at village or urban ward level may record local knowledge, identify a location, or describe a documented history, yet it does not confer land title in the way an issued certificate does. When officials or applicants mistake the evidentiary function of a local letter for definitive proof of ownership, a service-standard problem can become a dispute about authority and legal expectations. The study therefore examines what the local unit promises to verify, not whether its document can replace the land-registration system (Khoirot & Purwaningsih, 2025).

Service standards provide a reference for providers to explain what citizens can apply for, how applications are processed, and to whom objections should be submitted. Law Number 25 of 2009 on Public Services positions the drafting of standards and community involvement as part of the obligations of public service delivery (Republic of Indonesia, 2009). Its implementing guidelines distinguish service delivery components from internal organizational management components (Ministry of State Apparatus Empowerment and Bureaucratic Reform, 2014). Accordingly, the enactment of a decree is only one part of standardization. The next question is whether the content of the decree matches the services actually delivered and whether it is used by officials and the public (Liddle & Parker, 2024).

The need to examine this relationship arose from complaints received by the Ombudsman of the Republic of Indonesia, East Java Provincial Representative Office, hereafter the East Java Ombudsman. An inventory of 2024 administrative data identified 93 complaints concerning land matters. Of these, 26 named a village or urban ward as the reported party; 16 of them related to land administration, including 10 concerning land statement letters. The recorded problems included rejected applications, uncertain processing times, and unclear procedures. These complaint data provide context for the field research and are not intended as a measure of the prevalence of problems among all service users.

Complaint totals are a useful point of departure, but they cannot be converted into a population-level failure rate without a denominator of service users and a consistent record of who chooses to complain. The 2024 inventory establishes that land-document problems were present in the Ombudsman's reported caseload, not that every village or ward experienced them at the same intensity. In the subsequent analysis, complaints are used to identify questions about refusals, waiting time, and communication that can be investigated through documentary comparison, rather than to claim a measured improvement or deterioration in performance (Sebő & Bel, 2024).

A second distinction concerns the citizen's journey across organizations. The village or urban ward may provide a supporting letter, while other offices determine

whether land registration, adjudication, or related procedures can proceed. The absence of one clearly stated local requirement may therefore generate repeated visits and uncertainty at a later stage. This chain can be analyzed as a coordination problem without assuming that every delay originates with the village. Separating the functions of local records, administrative advice, and formal land-right determination is fundamental to an accurate assessment of service standardization (Widyanti et al., 2025).

Previous studies have explained a number of obstacles in local service delivery. Previous land-service research found problems with facilities, administrative processes, and document completeness in land services in Alebo Village. In licensing services in Sidoarjo, Other local public-service research discussed constraints related to implementers' capacity and the application of standards. A study of service integration showed a gap between formal integration and operational implementation at a public service mall in Kendari. Together, these studies help explain why formal instruments need to be examined alongside service practices. However, an issue that still requires deeper attention is how to distinguish units that have not adopted standards from units that already have standards but have not yet regulated all of their products or implemented their provisions (Saidin et al., 2024).

This distinction is relevant to land administration, whose delivery involves several levels of government and different types of knowledge. Research on land-system modernization identified regulatory, business process, and coordination challenges in modernizing Indonesia's land administration system. A recent review likewise situates changes in land administration within the evolving relationship between people and land. At the village and urban ward level, system reform encounters diverse document names, uneven availability of records, and divided guidance responsibilities. Consequently, a common national obligation does not sufficiently explain why standards develop differently across service units (Kusmiarto et al., 2025).

An institutional framework is used to read the relationship between formal obligations and organizational action. Recent institutional research distinguish the decoupling of policy from practice from the decoupling of organizational means from intended ends. In a study of land reform in Tanzania, Comparative governance scholarship demonstrated the importance of relationships between tiers of government for policy implementation. Both studies draw attention to the process through which rules are translated into local work. Nevertheless, the absence of standards and non-compliance with standards that have already been established are different conditions. This distinction is necessary so that explanations of institutional decoupling remain consistent with the evidence found (Gofen et al., 2025).

The analytical contribution proposed here is a three-part diagnostic typology: adoption, product coverage, and operational implementation. These labels do not imply three mutually exclusive causes or a single institutional stage that everyone passes through at the same speed. They distinguish the immediate object of oversight. Where there is no standard, guidance must address its creation; where a standard excludes a practiced service, the inventory and legal scope require review; and where an approved product is not communicated consistently, attention shifts to implementation and public visibility (Rossi et al., 2025).

Street-level discretion is relevant because local officials are routinely asked to interpret incomplete historical records, unusual requests, and procedures developed elsewhere. Discretion need not indicate wrongdoing, particularly when staff seek to help applicants navigate uncertain files. Yet discretion becomes problematic when similar applications receive different explanations without an articulable basis. Recent

scholarship on frontline organizations suggests examining both the formal room for judgment and the institutional supports through which judgments become accountable. In this study, that distinction illuminates variability in service language, not the motives of individual officers (Choi et al., 2026).

Building on this problem, this study asks how land administration service standards are adopted, how they define service coverage, and how they are implemented in the villages and urban wards studied in Surabaya and Sidoarjo. It aims to compare forms of standardization gaps and to examine how they relate to guidance, service information, and public input. Through a comparative case study, this article offers a diagnostic typology that links the condition of each unit to its improvement needs. Its contribution lies in explaining which parts of standardization remain unfulfilled, so that oversight can provide direction better suited to the problems faced by each service provider.

Rather than claiming that Surabaya performs better or worse than Sidoarjo, the investigation compares configurations of governance. The nine sites include two administrative statuses and several different levels of documentary completion. The comparison makes it possible to ask whether a standard exists, whether the relevant service appears in it, and whether an applicant can find dependable information. The aim is to identify workable remedial pathways for different configurations, not to infer regional rankings from a purposive selection of units or to treat formal document production as a complete proxy for service quality (Pill, 2024).

RESEARCH METHOD

This study employed a qualitative approach with a comparative case study design. Data were collected in 2025 as part of the East Java Ombudsman's maladministration prevention activities. The unit of analysis was the governance of land administration services in each village and urban ward. Guidance provided by the local governments and sub-districts was examined as the institutional context shaping the drafting and use of standards. This design allowed comparison among the prevailing rules, implementers' explanations, and the practices observable at the research sites.

The comparative design was organized around the actual service event as well as the formal document. At each site, the substantive question was what an applicant seeking a land-related supporting letter would be told about entitlement to apply, documentary requirements, fees, processing steps, and available complaint channels. These items were then placed against the regulation or decree said to govern the unit. The approach addresses potential divergence between a standard as a legal-administrative statement and a standard as a usable promise in daily public service (Braun & Clarke, 2022).

The study covered nine service units. The five urban wards in Surabaya were Genteng, Sukomanunggal, Jambangan, Sukolilo Baru, and Tanah Kalikedinding. In Sidoarjo, the research was conducted in Magersari and Krian urban wards and in Sidomulyo and Kalitengah villages. The comparison included units with different administrative statuses under the guidance of two local governments. This selection enabled comparisons of practices across the cases studied, rather than as a statistical sample of villages and urban wards in East Java. The research sites and the focus of data collection are summarized in Table 1.

Case selection deliberately included wards governed by a municipal standard-setting framework and villages for which guidance passes through different supervisory offices. The case contrast supports exploration of institutional mechanisms, but it cannot estimate how many wards or villages in either jurisdiction experience a particular gap.

The observed case counts are therefore reported only for the nine visited units. The distinction also limits claims about service outcomes: the research can establish whether information was observed, not the probability of an application being granted within a given period (Morgan, 2022).

Table 1. Research Sites and Focus of Data Collection

Site Group	Units or Agencies Studied	Focus Of Data Collection
Surabaya urban wards	Genteng, Sukomanunggal, Jambangan, Sukolilo Baru, and Tanah Kalikedinding	Product types, standard coverage, publication, participation, and complaints
Sidoarjo urban wards	Magersari and Krian	Standard-setting, implementers' understanding, information, and complaints
Sidoarjo villages	Sidomulyo and Kalitengah	Land services, standard-setting, and village guidance
Supervising agencies	Organization Division, Governance Division, Community and Village Empowerment Office (DPMD), and sub-districts according to their authority	Division of guidance, coordination, and monitoring of standards

Source: Field data collection, 2025.

Informants were officials and implementers involved in issuing documents, drafting standards, or providing service guidance. They included village heads, urban ward heads (lurah), secretaries or supporting staff, sub-district officials, and officials and staff of the relevant regional government agencies. Interviews followed a list of questions on requirements, issuance processes, document formats, understanding of standards, public consultation forums, and complaint handling. Information on guidance was obtained from the agencies performing that function and then compared with the explanations of the service units they supervised (Rossi et al., 2025).

Observation was conducted overtly, with the researchers disclosing their identity. It covered service rooms, the publication of requirements and procedures, information on time and fees, complaint facilities, and electronic media. A monitoring checklist was used to examine the same elements across different sites. Document review covered regulations, service standard decrees, standard operating procedures (SOPs), public consultation documents, and complaint arrangements. As emphasized by Methodological research, documents were read with attention to their function and the context in which they were produced. In this study, document review complemented interviews and direct observation of services.

Triangulation was applied to specific propositions rather than simply to the overall impression of each office. The claim that a standard existed was checked against the instrument establishing it; the claim that land services were covered was checked against the product list; and the claim that citizens could obtain information was checked against the observed media. When documentary and interview material diverged, the divergence was retained as evidence of a governance issue. This safeguards against treating an

official assertion, a web page, and an enacted decree as interchangeable sources (Sartono et al., 2026).

The analysis was conducted thematically by reading data collection notes, grouping information, and constructing cross-site comparison matrices. The dimensions compared were standard-setting, coverage of land products, publication, implementers' understanding, participation, and complaint management. Relationships among these dimensions were interpreted through the institutional framework, in line with Recent thematic analysis scholarship's emphasis on the alignment of research questions, concepts, and analytical steps. The gap typology was developed from the comparison of findings, and its categories were not used as performance scores or rankings (Braun & Clarke, 2022).

Cross-checking was performed by comparing informants' explanations, service decrees, and information found during observation. A statement that a standard was available, for example, was checked against the decree establishing it and the media through which it was published. Divergent cases were retained, including the land service standard in Krian Urban Ward and the complaint information in Magersari Urban Ward. The findings describe conditions during the 2025 data collection period. Informants' statements are presented as paraphrases, the personal identities of complainants are not disclosed, and the discussion focuses on organizational practices. The researchers' position within an oversight institution was taken into account in the interpretation because it may have influenced the information provided by service providers.

The research team's institutional role is relevant to interpretation. Officials interviewed during an oversight-related activity may present planned improvements, explain omissions defensively, or distinguish their jurisdiction from another agency. This risk was managed by emphasizing observable products and decrees and by treating reported intentions as intentions. The study does not infer that a named officer knowingly withheld information or that a complainant's allegation was established merely because it appeared in an Ombudsman register. Citizen-side experiences, administrative processing times, and the later durability of reforms remain outside the field record (Durose & Lowndes, 2024).

RESULTS AND DISCUSSION

1. Differences between Standard-Setting and Service Coverage

The examination of the five Surabaya urban wards found that service standard decrees existed, but land administration products were not listed in them. The city government has regulated urban ward service standards through Mayor Regulation Number 55 of 2021 and its amendments, including Number 81 of 2023. The problem lies in how far these provisions reach the services that officials described in practice. Therefore, the existence of general standards in an urban ward cannot be equated with the availability of standards for land services.

A revised general standard would count as a substantive correction only if its annex or product list included the relevant land service, named the responsible actor, and set out clear requirements and routes for objection. The proposed test focuses on the standard and its match with a real service product, rather than on the volume of documents approved (Munawaroh, 2024).

The types of products recognized by implementers also varied. Genteng Urban Ward used territorial statement letters as supporting documents for land matters. According to the urban ward, this format was used because neither verponding registers nor Letter C records were available. Sukolilo Baru Urban Ward recognized land statement

letters and land history statement letters, whereas Sukomanunggal Urban Ward described its output as a reply letter to citizens' requests. These differences show that services need to be identified according to the function of their documents. Searching for a single product name risks overlooking services that are in fact provided under different names.

Variations in the names of letters should not be standardized by imposing a single label before their functions have been clarified. A territorial statement, a historical account of tenure, and an explanatory reply may respond to different requests and draw on different records. A comparative inventory should record what the document states, what evidence an official checks, what the document expressly does not certify, and which receiving office may use it. Only then can compatible stages be harmonized while legitimate differences in scope are retained (Adam, 2023).

Historical administrative data pose a distinct challenge. Some communities retain older registers or local knowledge, whereas others no longer possess a complete sequence of records. A clear service standard should specify how an office handles the absence of a register without inviting personnel to assert facts they cannot verify. Officials may need to offer a limited statement explaining the available evidence, seek supplementary documentation, or explain why the requested product cannot responsibly be issued. These are possible policy options that require legal review; the case material does not establish a uniform lawful solution for all requested letters (Meckelburg & Wardana, 2024).

Jambangan Urban Ward illustrates a site where applications rarely arise. The urban ward stated that it had not issued statement letters for land administration since 2023 but would still provide the service if an application were submitted. This statement should be read as information about practice and service readiness. A low frequency of applications does not indicate whether the requirements and issuance steps have been agreed upon. In drafting standards, what must be established is which types of service fall within the urban ward's authority and which procedures apply when citizens need them.

In Sidoarjo, Sidomulyo and Kalitengah villages had not established service standards and delivered land services based on custom. Magersari Urban Ward used an SOP containing several service elements but had no formally established service standard. Krian Urban Ward differed from these three units because it had regulated land history statement letters in its standard. However, publication of Krian Urban Ward's standard was not found either in the service room or in the online media examined. Table 2 shows that the availability of a decree, land coverage, and public information form different conditions across units.

An important implication is that formalization and communication can evolve independently. A ward may communicate several requirements before a standard is properly enacted, or may enact an instrument without ensuring that a citizen can locate it. Effective oversight needs two evidence checks: one for validity and coverage of the operative standard, and another for how accurately it is conveyed in the service room and digital media. This dual test avoids a false choice between paperwork compliance and public usability; both are necessary for a dependable service promise (Halim, 2025).

These differences matter for compliance assessment. In Magersari Urban Ward, the existing procedures can serve as material for drafting a standard but do not replace the process of formally establishing one. In the five Surabaya urban wards, improvements need to extend to land services that have not yet been regulated. In Krian Urban Ward, the immediate need is to communicate the established standard to the public. If all of

these conditions were labeled as an absence of standards, oversight would lose information about the work already done and the parts that still need to be completed.

Table 2. Service Standards and Information in the Nine Research Units

Service unit	Formal standard	Land coverage	Information at observation
Genteng, Surabaya	Available	Not yet included	Website information differs from the standard decree
Sukomanunggal, Surabaya	Available	Not yet included	Website information differs from the standard decree
Jambangan, Surabaya	Available	Not yet included	Website information differs from the standard decree
Sukolilo Baru, Surabaya	Available	Not yet included	Website information differs from the standard decree
Tanah Kalikedinding, Surabaya	Available	Not yet included	Website information differs from the standard decree
Magersari, Sidoarjo	Not yet established	Service SOP available	Partial service information available
Krian, Sidoarjo	Available	Land history covered	Publication of the standard not found
Sidomulyo, Sidoarjo	Not yet established	Served based on custom	Published standard not yet available
Kalitengah, Sidoarjo	Not yet established	Served based on custom	Published standard not yet available

Source: Interviews, observation, and review of service documents, 2025.

This finding relates to comparative research on local land practices operating within an incomplete institutional framework and uneven administrative guidance across settings. Services can continue through custom even when formal arrangements do not yet cover all activities. The relevance of this comparison lies in the relationship between rules and local routines; however, the political and transactional character of the Senegalese context does not necessarily apply to the cases in this study. In Surabaya and Sidoarjo, the diversity found instead calls for a closer examination of document functions and of how procedures are understood by implementers (Lavigne Delville et al., 2023).

The case evidence does not warrant attributing a single motive to all differences. Omitted products might reflect legitimate caution about legal responsibility, incomplete guidance, inherited document practices, or other circumstances not explored through direct organizational process tracing. The typology therefore classifies observable conditions, not presumed intentions. A future implementation study could examine whether discretion, resource constraints, or conflicting mandates explain how these conditions arose. The present contribution is narrower and more defensible: it makes the condition visible and specifies what evidence would demonstrate a remedy (Larsen et al., 2025).

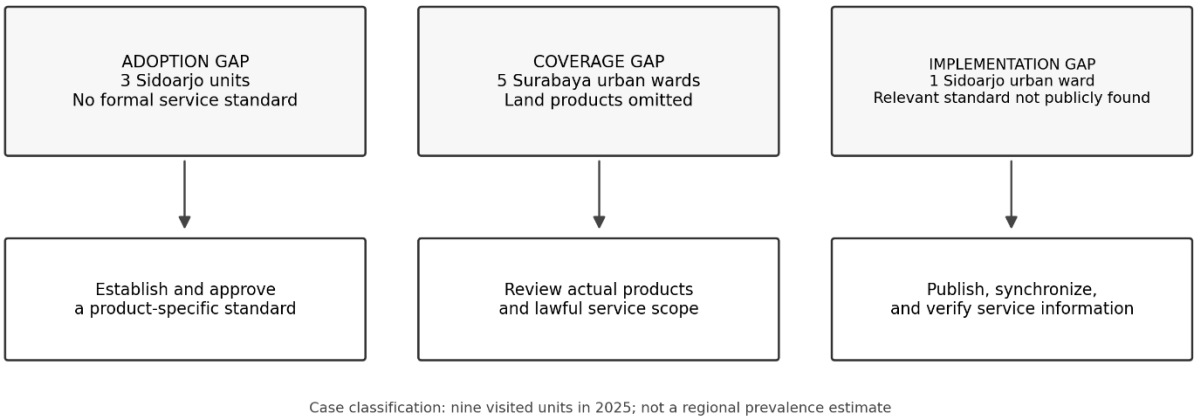


Figure 1. Diagnostic Typology Of Standardization Gaps in The Nine Studied Unit
Source: Authors, 2026

2. Guidance Has Not Yet Connected Obligations with the Work of Service Units

The division of guidance responsibilities in Sidoarjo shows how the same obligation encounters different support channels. The Organization Division explained that facilitating urban ward service standards was part of its work, whereas guidance for villages fell under the DPMD. In interviews, the DPMD explained that its coordination and supervision had so far concerned mainly village planning and budgeting documents. According to the officials interviewed, no coordination with the Organization Division on drafting village service standards had ever taken place. Meanwhile, implementers in Sidomulyo and Kalitengah villages did not yet have an adequate understanding of the obligation to draft standards.

In the Sidoarjo setting, guidance responsibility should be considered at the interface between the organizational unit responsible for administrative standards and the unit responsible for villages. If each institution assumes the other handles land-service products, a general duty may remain unimplemented even when routine communication is active. A practical response would establish which agency initiates the product inventory, which validates the legal scope, who facilitates consultation, and who verifies publication after enactment. These are proposed allocations for discussion, not responsibilities shown to have been formally reassigned (Liddle & Parker, 2024).

The village and urban ward distinction also places limits on institutional borrowing. An urban ward's public-service template may be useful as a starting point, but a village's records, decision processes, and supervisory arrangements may differ. Guidance should be adapted to those differences while maintaining common minimum information on service conditions, decision authority, and complaint channels. What is transferable is the logic of a clear, verifiable service commitment, not necessarily the precise wording of a municipal decree. Such differentiation helps prevent formal uniformity from concealing operational mismatch (Bastianen & Keuffer, 2025).

These accounts indicate a service area that has not yet received substantive support. Communication with villages continues, but the content of guidance has not yet reached the problems found in land services. Thus, the existence of guidance activities needs to be considered together with their content and recipients. Comparative governance findings on relationships between administrative tiers help explain this issue: policy implementation at the local level also depends on how tasks are passed down and supported by the supervising organizations. In the Sidoarjo case, the boundary between urban ward and village guidance is an important part of that context (Pill, 2024).

In Surabaya, interviews with the Governance Division revealed other considerations in regulating land services. Officials explained the complexity of land administration, the variety of letter formats, and concerns about the civil-law implications of the statements issued. This explanation provides context for the difficulty of formulating standards, although it does not prove that the same cause applies to all urban wards. Guidance needs include clarifying what an urban ward may state, the records on which such statements are based, and the limits of officials' responsibility. At this point, standardization requires a substantive clarification of the service, in addition to the preparation of the decree format.

Understanding of standards also varied after the documents had been established. Interviews found difficulty in distinguishing service standards from SOPs in several units, including Krian Urban Ward. In Sukolilo Baru Urban Ward, the issue concerned understanding of the content of the standard. Yet service standards set out the provider's commitments to users, whereas SOPs govern implementers' work steps. The two are related but serve different functions. Guidance that checks only the availability of documents will find it difficult to determine whether officials can explain requirements or handle applications that cannot yet be processed (Knox & Arshed, 2024).

The relationship between decrees and routines can be read through the concept of policy–practice decoupling (institutional scholarship). However, the gaps in units that have not established standards still need to be treated as a problem of adoption. This distinction avoids premature explanations in terms of symbolic compliance or deliberate intent on the part of officials. The research evidence supports attention to the reach of guidance and implementers' understanding, whereas organizational motives and the effects of workload were not specifically investigated.

Differences in staff understanding also imply that training should be organized around representative case files rather than only readings of regulation titles. For example, a request supported by an old village register raises different questions from an application made where that register no longer exists. Staff should practice explaining the evidence they can examine, the decision maker, possible requests for completion, and the proper objection route. Such exercises would make visible where the normative standard leaves critical discretion unsupported, while avoiding any assumption that training alone resolves legal ambiguities (Knox & Arshed, 2024).

3. Publication of Standards Requires Consistent Content and Responsibility for Updating

The urban wards studied in Surabaya City already used electronic information media. However, the examination found discrepancies between the standard information on the websites and the decrees issued by the sub-district head (camat). The urban ward websites are linked to a service portal managed by another regional government agency. Service rooms also displayed a variety of facilities, such as a television screen in Genteng Urban Ward and a QR code in Jambangan Urban Ward. These facilities broaden the range of media for conveying information but do not ensure that the content citizens receive follows the prevailing decree.

Digital transformation should be assessed as an institutional process rather than as the introduction of a website or QR code. A useful test is whether applicants encounter the same requirements, fees, estimated completion time, and complaint destination regardless of which channel they use. A webpage can be technically accessible yet substantively unreliable if it conflicts with the decree. Any proposed data integration should also distinguish public information from personal land files, since publication of

service rules does not authorize unlimited disclosure of records about applicants or property disputes (Pribadi et al., 2024).

The situation in Krian Urban Ward shows the publication problem from a different direction. A service standard for land history statements had been established, but its publication was not found in the media examined. Conversely, Magersari Urban Ward provided partial information on products, requirements, time, and complaints even though it had not yet formally established a standard. This comparison shows that the completeness of information and the enactment of decrees can develop separately. Assessing publication therefore requires examining the relationship between the two, so that the information disseminated has a clear basis and version (Halim, 2025).

A review of digital change describes digital change in the public sector as an organizational process involving adjustments to ways of working. The findings of this study illustrate this issue at the level of local services. When decrees are issued through one channel and information is managed through another, consistency of content requires a division of updating tasks. The number of websites or channels used does not adequately reflect openness if changes to requirements and procedures have not been carried through to all media. What needs to be examined are the reference documents, the parties who update the information, and how changes are recorded (Haug et al., 2024).

Such an examination can start from a single service product. The content of the decree is compared with information boards and web pages to check the consistency of requirements, procedures, time, fees, and complaint mechanisms. The number and date of enactment help identify the version in use. This proposal stems from the information discrepancies found during data collection. Its practical value lies in providing a verification step that providers can carry out before adding new media. The study did not measure citizens' experience in using this information, so the magnitude of its effects on applicants still requires direct investigation.

A publication audit can be arranged around a single named product and a single version of its standard. The auditor first identifies the operative instrument, extracts each public-facing requirement, and then compares that list with service-room notices, the website, and any linked portal. Discrepancies are documented with the date and location of the observation, and a responsible office is asked to explain the authoritative version. This produces a traceable corrective request without claiming an unobserved outcome for citizens. It also provides a feasible basis for periodic reviews following an amendment (Noor et al., 2025).

4. Participation and Complaints as Input for Updating Standards

Interviews and the review of public consultation forum documents showed that forums had been held in a number of Surabaya urban wards. These activities were often facilitated by the sub-district, brought several urban wards together, and were combined with development planning deliberations (musrenbang) or other agendas. Sukolilo Baru Urban Ward recorded a forum held together with outreach on the digital population identity (IKD), involving residents of one neighborhood unit (rukun warga, RW). Several informants stated that the discussion of services became less specific in combined forums. These accounts reflect the providers' perspective, while the experiences of citizens who took part in the forums were not explored through direct interviews.

Public consultation is more consequential when the people most likely to encounter a service can identify its practical obstacles. Residents with incomplete records, applicants acting for older relatives, and people uncertain about the status of a historical land document may raise issues different from those discussed in a general

development-planning meeting. The interviews available for this study concern providers' accounts of consultations, not the experiences of participants. Future rounds should therefore assess who attended, which land-service questions they raised, and whether the final standard records a response to those questions (Ho et al., 2023).

The substantive test of participation is whether it changes a decision or clarifies why a requested change cannot be made. A forum may legitimately reject a proposal when it conflicts with law, but the reasons should be understandable and recorded. Feedback also should not be treated as unanimous simply because a meeting occurred. More inclusive consultation would combine understandable drafts, opportunities for written comments, and an account of how the standard changed. These elements are proposed safeguards against purely ceremonial participation, not measured attributes of the nine research sites (Schwoerer et al., 2022).

The combining of agendas needs to be assessed through the material discussed and its outcomes. Forums can be used to identify difficulties with requirements, but their usefulness for standards depends on whether such input is translated into changes in provisions. Research on participatory land administration, through their research on land administration in Odisha, highlight the limitations of participation that relies on information exchange without sufficiently recognizing community knowledge. Scholarship on participatory administration likewise emphasize attention to context and collaboration in public administration design. Both studies help direct the evaluation of forums toward the substance of engagement, including the relationship between user experience and service decisions (Ho et al., 2023).

Community involvement can be organized according to the knowledge needed at each stage. Research on citizen co-design found benefits of user involvement in defining problems, while similar benefits did not hold for all the forms of co-design tested. In drafting standards, users can help point out confusing requirements or information that is not yet available. Providers then explain the basis of their authority and the possibilities for change. The trail of this process can be examined by comparing participants' input, the initial draft, and the established standard. Participants' presence becomes meaningful for service improvement when its link to decisions can be traced.

Co-design should not require applicants to perform tasks that belong to public authorities. Citizens can describe confusion, identify inaccessible channels, and test whether explanations make sense; officials remain accountable for legal consistency, records management, and final decisions. This allocation is particularly important when land matters involve competing claims or sensitive personal information. A consultation process can value local knowledge while providing structured routes for disagreement. Without documented decisions, an invitation to participate risks adding expectations without making the administration more responsive (Mannak et al., 2025).

Complaints provide input through a different channel. Observation found electronic channels in the Surabaya urban wards, but information on the complaint flow, response time, and designated handlers was inadequate. Magersari Urban Ward had published its complaint flow, although limitations remained regarding response time and the designation of officers. In Krian Urban Ward, the procedure was included in the standard decree but had not been communicated to the public. These conditions indicate the parts of complaint management that need to be completed in each unit. Improvements can build on the elements already in place while clarifying the responsibilities and stages that remain unclear.

The complaint mechanism is best understood as a workflow rather than a contact address. For each land-related service, citizens need to know how a complaint is

accepted, which official is responsible, what acknowledgment or update they can expect, and where unresolved matters can be escalated. The study observed gaps in these elements, but it did not follow individual complaints from receipt to resolution. Consequently, the analysis can diagnose missing arrangements while leaving claims about responsiveness, satisfaction, or remedies to future tracking of cases (Kumar, 2025).

A complaint system also produces information for revising standards when grievances are classified by the step that failed. Repeated queries about an unclear document requirement point to a different corrective action than complaints about inconsistent reasons for refusal. Cases should be grouped by subject, checked for recurring patterns, and reviewed against the governing standard. This creates a possible learning loop from frontline interaction to formal revision, without assuming that a smaller complaint count necessarily signals improved service. People may refrain from reporting precisely when trust or access is low (Wang et al., 2025).

Research on digital complaints, in a study of water complaints in Mumbai, demonstrated the importance of the content of follow-up, since administrative closure does not always mean action that addresses the problem. Research on institutional feedback linked government responsiveness to the institutionalization of feedback and bureaucratic incentives. For this study, both works explain why the provision of channels needs to be followed by arrangements for handling complaints and recording their outcomes. The evidence collected concerns the readiness of complaint arrangements and was therefore not used to assess the rate of successful case resolution at the research sites (Kumar, 2025).

The number of complaints is also influenced by citizens' propensity to report. Comparative analysis of citizen complaints found a relationship between political participation and complaints about urban services in Barcelona. Thus, a small number of complaints needs to be read together with access and reporting behavior. For updating standards, the more useful information is the type of recurring obstacle and the part of the procedure associated with it. Records of unclear requirements, for example, can be a reason to review the wording of the standard and its information media. In this way, complaint handling opens learning opportunities for service units once individual cases have been resolved.

Complaints cannot be interpreted without attention to who can use the system. A channel accessible only by smartphone may exclude some people, while a service-room box without a visible response procedure may fail to generate confidence. Different user groups can encounter different barriers, especially where land history is complex or information is held by older family members. A future assessment should examine access conditions, frequency of responses, resolution substance, and opportunities to appeal, while protecting the identities of complainants and the confidentiality of land records (Skålén et al., 2026).

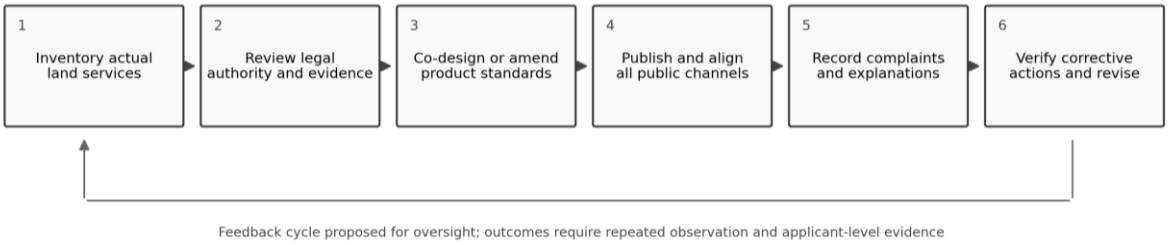
5. Gap Typology and Implications for Oversight

The three-part typology should be used as a diagnostic sequence, not as an ordinal score of governmental merit. Adoption indicates that a legally required instrument is missing; coverage indicates that an enacted instrument does not reach the relevant product; implementation indicates problems in communicating or applying the applicable provisions. The last condition can coexist with the first two, so a category names the most immediate remedy rather than a permanent identity of the unit. In the observed cases, the categories clarify why identical oversight instructions would be poorly matched to distinct circumstances (Yan, 2026). Institutionally, this direction strengthens the link

between rules and everyday work. An institutional perspective helps explain the importance of this link in the implementation of organizational policy. In local land services, standards acquire a practical function when their content is used by officials, announced to the public, and used as a reference in responding to objections. The implication for oversight is to ensure that this link is formed through support that matches where the gap lies.

A governance-oriented audit also requires attention to the administrative chain behind each recommendation. Issuing a written request to revise a standard is not the same as verifying that a revision occurred or that citizens can use it. The accountable body should identify an owner, completion condition, and documentary evidence for each step. This helps move oversight from a count of recommendations toward review of institutional changes, including whether the product list is accurate, whether the publication channel reflects the latest rule, and whether complaint handling has an identifiable responsible officer (Talbot & Boiral, 2023).

Figure 2. Proposed Evidence-To-Action Cycle For Differentiated Service-Standard Oversight



Source: Author, 2026

Strengthening openness can begin by ensuring that each service product has easily accessible information on requirements, procedures, time, fees, and complaints. Oversight encourages units to align their decrees with information boards and web pages while designating those responsible for updating them. A common reference gives citizens a basis for understanding a service before submitting an application and for comparing the information they receive with the provider's provisions. Openness thus encompasses both clarity of content and traceability of information sources. The direction of oversight and the improvements encouraged are summarized in Table 3.

The proposed reform sequence can be tested through a small set of verifiable records before expensive digital restructuring is considered. Examples include a product register signed by the competent unit, a map of legal authority, a consultation record focused on land services, a standard with specified requirements and time commitments, publication screenshots with dates, and anonymized complaint tracking. These materials would not establish final outcomes by themselves, but they would make implementation auditable. The method emphasizes traceability and proportional institutional learning rather than assuming that technology or the presence of a decree automatically creates accountability (Pudjono et al., 2025).

Openness needs to be accompanied by procedural certainty. A service inventory allows territorial statements, land history statements, and land statements to be examined according to their function and issuing authority. The results of this review are then used to clarify requirements, work steps, and the reasons given when an application needs to be completed or cannot yet be processed. In units where applications are rare, the standard serves as a reference for service readiness. Oversight that follows the

relationship between products and procedures can encourage more consistent explanations across officials and limit interpretations that lack an administrative basis.

Table 3. Direction of Oversight and Service Improvements Encouraged

Gap	Oversight priority	Improvement encouraged	Evidence of follow-up
Adoption	Support for drafting standards together with users	Clearer requirements, procedures, time, and fees	Standards established and published
Coverage	Review of service products and authority	Certainty of service types and limits of responsibility	Product list consistent with actual services
Implementation	Alignment of publication and complaint management	Open information and traceable follow-up	Up-to-date information and records of complaint responses

Source: Analysis of field research findings, 2025.

A final policy implication concerns equitable access to administrative certainty. Applicants with complete documentary histories and digital literacy may navigate inconsistent information more easily than residents who depend on oral explanations or incomplete archives. Standardization should therefore make difficult cases more intelligible, not create rigid exclusions that disregard legitimate variation in evidence. Plain-language explanations, alternate ways to receive updates, and a documented route for reasoned decisions can contribute to fairness while respecting the legal limits of local statements. These are prospective design principles that require direct citizen testing before effectiveness can be claimed (Bassey, 2025).

Accountability is strengthened by linking improvement recommendations, the implementers responsible, and evidence of completion. Recent audit research emphasize the importance of integrating audit recommendations into organizational work. In this context, follow-up needs to be examined through changes in standards, updates to information, and records of complaint handling. Designating officers and response times gives citizens clarity about whom they can ask for explanations. Recording the process also helps supervising agencies assess whether commitments to improvement have been translated into action in service units.

Performance indicators should be differentiated by the gap being corrected. For adoption, the initial outcome is an approved, accessible standard produced through the appropriate consultation process. For coverage, it is an updated and legally reviewed inventory of the land products actually delivered. For implementation, it is consistent information across channels and a documented procedure for complaints and updates. Measures of processing time, applicant burden, fairness of decisions, and satisfaction are more demanding service outcomes that require separate data collection. This prevents administrative completeness from being mistaken for demonstrated citizen benefit (Hong et al., 2025).

The division of guidance between villages and urban wards should then be clarified so that each unit receives appropriate support. Questions of authority can be discussed with the relevant agencies, while officials' understanding can be strengthened through the discussion of sample applications. Consultation forums and complaints provide input

on confusing provisions or information that needs to be updated. When such input is linked to the review of standards, oversight opens space for citizens to influence improvements. This orientation positions oversight as a process of institutional learning that supports more open, consistent, and accountable services.

Taken together, the nine units demonstrate how a common statutory obligation can produce different operational states when product classification, guidance authority, and communication practices are not aligned. The study supports targeted oversight rather than a uniform assumption of noncompliance. Further work should involve applicants, follow case histories over time, and examine how any adopted standard affects administrative decisions. Without those data, the proposed model remains a diagnostic and improvement framework. Its practical contribution is to specify what must change, who should document the change, and how subsequent evaluation can distinguish plans from implementation (Aquino, 2024).

CONCLUSION

The standardization of land administration services in the Surabaya and Sidoarjo cases faces problems at different stages. The enactment of decrees does not always cover the products being served, while the existence of provisions for a product does not ensure its publication. By distinguishing adoption, coverage, and implementation gaps, this study explains why the existence of documents alone is insufficient for assessing the relationship between standards and service practice. Local government guidance needs to follow the part of the process that remains unfulfilled in each unit.

The analysis contributes to public administration scholarship by separating the formal adoption of rules from their product scope and their everyday usability. The same units cannot be meaningfully assessed through a single indicator of whether a decree exists. In the observed sample, three units lacked formal standards, five urban wards had standards without land-service coverage, and one ward had a relevant land standard whose publication was not found. These findings describe specific 2025 conditions and should not be generalized to all service units in Surabaya, Sidoarjo, or East Jawa.

Improvement can begin with an inventory of actual services, clarification of authority, and a division of guidance responsibilities. The resulting decrees then need to be translated into officials' understanding, accurate information, and clear complaint handling. Public input helps identify provisions that require review, while oversight examines the changes that occur in service units. The proposed typology provides a basis for planning such follow-up. Its effects on user experience and service outcomes still need to be tested through research that involves citizens and follows the implementation of improvements over time.

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