Between the Reality and the Regulation of Land Ownership Transfer Services by Buying and Selling at the Land Office

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Abstract. This research attempts to ascertain how service rules for the purchase and sale of land ownership rights are implemented and to explain the difficulties encountered while enforcing legislation. The implementation model theoretical reference from van Metter & van Horn is utilized to tackle this issue. Data collecting methods included observation, document analysis, and interviewing. Using interactive model analysis procedures that include data reduction, data display, and conclusions, the data was examined. Interviews, observation, and document analysis are all employed in the data collecting process. This analysis demonstrates that while the adoption of the rule has followed the proper procedures, the timeliness of service is still far behind expectations. This is because there are many application files, which means that the workload is more than the capacity of the available human resources, the application files are incomplete, the applicant's ID has not been verified, and there are no supervising or executor officials in place.

Keywords: Policy; Implementation; Land; BPN

INTRODUCTION

The interdependence between government and society is evident, particularly with regard to service provision. Regrettably, this relationship transforms into antipathy when discussing the services furnished by the government. Numerous individuals are familiar with service-related issues that have arisen, including sluggishness, disregard for public sentiment, lack of definitive service timelines, insufficient transparency regarding existing limitations, and various other challenges. Upon deeper comprehension, it can be inferred that service is an undertaking executed by the organizing entity with the purpose of fulfilling demands. The government serves as an organizing entity and carries out ongoing activities that are deemed necessary by the community. This aligns with the objective of the service, which entails a proximate association between the providers and recipients of the service, characterized by a set of entitlements and responsibilities. In order to effectively deliver services, service providers must possess a strong sense of responsibility and execute their duties within the boundaries of their designated authority. Public service providers endeavor to develop quality services in alignment with the
tenets of sound governance. It is imperative to ensure the protection and legal certainty of communities who are utilizing public services (Mohi & Mahmud, 2018; Sirajuddin & Atrianingsi, 2020).

The provision of services in the land sector is not immune to service-related issues, as the community is well acquainted with the protracted nature of land service. The persistent occurrence of land issues and the demand for land as a habitat persist year after year. The growth of population is not commensurate with the finite availability of land, which remains constant in quantity. The escalating price of land incites individuals to engage in competitive endeavors to acquire a parcel of land, with the trend persisting over time. The possession of certified land is a matter of significant public interest due to its elevated economic worth, legal assurance, and absence of apprehension regarding the land's future status.

The Ministry of Agrarian Affairs and Spatial Planning/National Land Agency is responsible for executing land services in a hierarchical manner, with services being provided directly to the community at the land office level. The standardization of land services has been implemented via the Regulation of the Head of the National Land Agency Number 1 of 2010, which pertains to Land Arrangements and Services. Additionally, the regulation provides insight into the various stages involved in the journey of land services, and outlines the procedures for reporting any obstacles encountered during the process of obtaining services.

A category of land-related activity involves the conveyance of entitlements to a parcel of land, contingent upon the nature of the transaction of buying and selling. As per the prescribed service standard, the process of transferring land rights can be accomplished within a maximum timeframe of five days. The proper implementation of these standards is crucial in achieving timely service goals, thereby exemplifying accountability in public service. It is the responsibility of the land office to ensure that the service is completed within a maximum timeframe of five days.

The actuality observed in the field presents a notable discrepancy, whereby the provision of service by the land office exceeds a duration of 5 days. The information furnished to the applicant will be concluded within a period of 3 to 4 weeks or 1 month of service. The aforementioned data was acquired from the candidate who oversaw the transfer of their land entitlements through direct management, without recourse to a power of attorney. The aforementioned information is also relevant to individuals who utilize power of attorney in their application process. The duration for which this service remains a subject of inquiry and warrants further investigation. The service in question adheres to the regulatory standards that dictate a four-stage process. This process begins with the receipt of the application file, followed by
document inspection at the service counter. Upon entry, the applicant is required to pay the registration fee, after which the recording and issuance of the certificate takes place. Finally, the certificate is delivered to the applicant.

The implementation of policies during the service phase appears to be straightforward and devoid of complexity or circumlocution. The individual presents the requisite paperwork to the officer and verifies the comprehensiveness of the application document. Subsequently, the applicant remits the registration fee to the officer. The officer then records the transactional activities in accordance with the deed of sale and purchase. Afterward, the authorized official endorses the transfer note as evidence of the legalized transfer and affixes the land office logo on the note. Finally, the completed certificate is handed over to the applicant. The aforementioned issues highlight the significance of delving further into the execution of the property rights certificate transfer service through the creation of a sale and purchase deed. Additionally, identifying the factors that impede or facilitate the service process is crucial in comprehending the service’s inability to fulfill its obligations within the designated 5-day timeframe.

The implementation of land services was investigated in a prior study conducted by Sutrisna and Wahyudi (2016). This study centers on the provision of land services, examining it through the lenses of legal frameworks, administrative personnel, and the community satisfaction index. In the meantime, Supendra (2016) conducted research that employed the identical legal foundation as the present study. However, the present study concentrates on the category of initial land registration/conversion service. The present research was informed by two prior studies.

The government assumes diverse responsibilities, among which is the provision of public services. The following are several concepts related to public service. The concept of service encompasses self and collective endeavors of individuals, groups, and organizations. It can be executed through direct or indirect means to attain objectives and fulfill requirements (Pasolong, 2010). Public services are a number of activities carried out by public administrators, the community’s need for goods/services or administrative needs is what the government must fulfill (UU Nomor 25 Tahun 2009 tentang Pelayanan Publik, 2009).

In the realm of public services, all forms of service-related activities, whether conducted directly or indirectly by public service providers, are aimed at meeting the needs of the community as service users and in accordance with legal provisions. In the aforementioned decree, the Minister for Administrative Reform asserted that the fundamental purpose of serving the
community is to furnish optimal governmental services to citizens, as the state’s dutiful representative (Keputusan MenPAN No. 63 Tahun 2003, 2003).

The primary factors involved in delivering services to the public encompass the following: facilitating ease of access for the community, ensuring transparency in administrative procedures and other relevant aspects, adhering to strict timelines as a metric of organizational efficacy, optimizing accuracy in product delivery by minimizing errors, and safeguarding the confidentiality of one’s own identity and that of others. The accountability for adherence to regulations, adequacy of facilities and infrastructure to facilitate service provision, accessibility characterized by openness and availability, adherence to predetermined schedules, and convenience are among the key considerations for service delivery (UU Nomor 25 Tahun 2009 tentang Pelayanan Publik, 2009).

According to the Big Indonesian Dictionary (KBBI), the act of buying and selling refers to a mutually binding agreement between two parties: the seller, who possesses the rights over the goods, and the buyer, who agrees to the transaction value of the traded goods. The occurrence of buying and selling activities is contingent upon the establishment of a mutual agreement regarding the selling price and exchange rate between the involved parties. The legislation pertaining to land registration, namely Law No. 24, was enacted in 1997. One of the discussions pertains to the transfer of property rights or ownership rights to a registered plot of land or apartment unit. This transfer can be carried out through various legal means, such as a deed of sale and purchase, an agreement between parties to exchange land parcels, or a land grant made by the owner to the desired party. In cases where the buyer is a company, the transfer can be included in the company’s assets. However, it is important to note that the transfer of rights through auction must be registered at the land office, provided that the authorized PPAT has provided the necessary deed in accordance with applicable regulations (Peraturan Pemerintah No. 24 Tahun 1997 tentang Pendaftaran Tanah).

The transfer of rights in a certificate can be executed in accordance with the applicable regulations, specifically Regulation of the Head of BPN Number 1 of 2010. The transfer can be facilitated through a sale and purchase deed, provided that the application requirements are met as outlined in Appendix II of the aforementioned regulation. As stipulated in Attachment II of the aforementioned regulations, the transfer of the certificate from the seller to the buyer is subject to a processing period of five days subsequent to the payment of the application fee by the applicant.
Wahab (2017), present text elucidates the concept of implementation, which involves comprehending occurrences in a particular domain for a given algorithm to execute, and subsequently emphasizes the consequences that transpire prior to and subsequent to the implementation of the program. The program's impact is assessed through the execution and management of activities that are documented and supervised. It is widely acknowledged that public policy is comprised of three distinct stages or processes, namely formulation, implementation, and evaluation. The subsequent discourse pertains to a theoretical framework posited by scholars in the field of public policy with respect to the execution of public policy.

The implementation of governmental policies is approached through a top-down model that has been formulated by Donald van Metter & Carl van Horn (Agustino, 2016). It is noted that there are six attention variables that may influence the realization of public regulations, namely: measuring policy objectives and achievements, the ability of policy actors in terms of quality and quantity, the behavior of involved implementers, the disposition of parties in implementing policies, coordination among involved parties, and the environmental conditions of the community.

METHOD

The selection of qualitative research in this study was based on the researchers' intention to explicate the phenomena that arise during policy implementation and the challenges encountered in the service delivery process. In qualitative research, comprehensive observation of policy actors' activities is conducted to gather data. The occurrence was articulated in a manner that was organic and linguistically appropriate (Moleong, 2007). A descriptive approach is used in this research because it will explain what happened in the field during the implementation process and identify the obstacles encountered. A descriptive approach is a method that functions to record the object of research as a whole through data or samples without the researcher providing analysis or drawing general conclusions (Sugiyono, 2012). Research data collection is carried out without disrupting the course of the service process and in natural conditions, primary data sources will be widely utilized and provide more time for observations of existing phenomena, participate in close and in-depth interviews in documentation. Researchers conducted observations as well as interviews starting from the service lobby, back office until the service product was delivered. Interviews, observations and document studies were used in this study in data collection (Sugiyono, 2016). The data analysis used is interactive model analysis.
RESULTS AND DISCUSSION

As indicated in the introductory section, the issues under scrutiny pertain to the process of transferring land ownership through sale and purchase. It is noteworthy that, in accordance with the BPN Regulation number 1 of 2010, this service is expected to be concluded within a maximum of five days. According to findings in the field of research, it has been determined that prior to the registration of a file, the applicant is required to undergo several stages, including:

1. Filling of the application form or application form by the applicant. Completion of the form is a mandatory requirement in the service process in accordance with applicable regulations

2. Counter A: The information counter staff helps check the physical completeness of the conditions for transferring land rights by way of sale and purchase. Validates the BPHTB payment at the Dispenda counter

3. Counter E: The applicant submits the application file to check the zone value of the land at the receipt counter of the file will be calculated as the basis for the PNBP fee

The aforementioned procedures are requisite for the applicant to fulfill prior to submitting their application for registration. Failure to validate the BPHTB pay sheet and the absence of a land zone value may result in rejection of the registration at the counter. Additionally, the service fee remains unknown. In the interim, individuals who have applied through the PPAT office are exempt from visiting the information counter as they are deemed to possess comprehension of the service prerequisites. The forthcoming stage involves the implementation of services aimed at facilitating the transfer of ownership rights to a plot of land that has been registered through a sale and purchase transaction. This process will involve the execution of four distinct activities, all of which are geared towards the successful completion of the transfer of ownership.

The land office performs four primary activities in a sequential manner, as indicated by the findings of research in the field. Each of these stages comprises intricate procedures for the journey of the application file. The initial stage of the journey involves the reception of the registration dossier and subsequent scrutiny of the application dossier by the designated officer responsible for verifying application files. Upon successful verification, the applicant may proceed with the application entry process at the KKP. The outcome of this process is a Deposit Order,
which provides details regarding the services offered, and a Document Receipt, which contains the attachments to the requirements submitted by the applicant.

Upon receipt of the registration fee payment from the applicant, the documentation is submitted to counter 3 (payment) for processing. Subsequently, the counter officer 3 issues model A (proof of the land office of the application file registered) to the applicant. The subsequent task involves the documentation and distribution of certificates. Upon payment of the service fee, the application files are disseminated to the back office. The aforementioned activity pertains to the transfer of ownership rights of a parcel of land, executed through a legal instrument known as the deed of sale and purchase. This transaction is duly recorded in the certificate and land book. As previously stated, the transfer of land rights constitutes a fundamental aspect of the service, and therefore entails a comprehensive range of activities that require meticulous attention to detail. The compilation of application requirements precedes the recording activity. This is performed to facilitate the analysis of the application file by the officer responsible for file analysis. Subsequent to obtaining a land book receipt, proceed to the Warkah section. Upon availability, append the land book to the application dossier. The registration of land rights transfer in the land book and certificate is conducted by officials on preliminary paper. Subsequently, the application dossier undergoes a thorough and substantive examination by the designated application file analysis personnel. The subsequent task involves documenting the process of transferring land ownership through certificates and land books. Subsequently, the dossier is forwarded to the Substance Group Coordinator responsible for the upkeep of land, space, and the development of PPAT rights. Subsequently, it is recommended to advance towards the respective head of the section and head of the office. Upon receiving approval from the head of the office, the transfer of ownership rights for a plot of land can be initiated on the legal basis of a recorded sale and purchase deed. Once this process is complete, the application file is deemed ready for submission at the designated counter.

The preceding exposition on implementation elucidates the process by which the transfer of ownership rights for a parcel of land is effectuated, highlighting the indispensability of each step in the creation of the service. This demonstrates that the land office must exercise caution in the implementation of this policy, as it constitutes a legal measure. Consequently, it is imperative to establish effective collaboration and synchronization among the entities concerned. It is imperative to establish a shared understanding between the counter and the back office to ensure a cohesive and consistent message is conveyed to applicants, thereby avoiding any potential confusion or conflicting explanations.
Empirical findings indicate that distinct limitations are associated with every phase. The aforementioned limitations are outlined as follows:

1. Lack of requirements for applying for the transfer of land rights. If there is a shortage of application requirements at the time of registration at the file reception counter, the application file is returned to the person concerned and this does not count towards the service processing period. It's another matter if the lack of these conditions, the position of the file in the back office, will affect service time and must be "delayed file" in the KKP application. Because if it is not done, the service meter will continue to run and run out waiting for the completeness of the requirements from the applicant. To convey these deficiencies, the back office staff must contact the applicant via the telephone number that the applicant has included. If this method is not successful, the applicant is informed by written letter addressed according to the applicant's identity.

2. The applicant's KTP has not been validated so it cannot be read during the entry process of the application file. When the entry officer processes the application file, to enter the identity of the applicant in the application, the officer only needs to enter the NIK and the name and address of the applicant will automatically appear. When the applicant's KTP has not been validated by the local Population and Civil Registry Service, the name and address do not appear, so the applicant must validate first.

3. The KKP application runs slower and even has errors. During the entry process, the application file becomes obstructed and affects the payment billing code that does not appear. In addition, it also affects the issuance of payment confirmation (NTPN) which is slow. If the NTPN has not been issued, the application file must wait to be sent to the back office.

4. The volume of incoming application files. During the research, the researchers found that in 2019 and 2020 the number of requests in a year was over 6,500 requests for services for the transfer of ownership rights to a plot of land with a sale and purchase transaction agreement. In a day the number of requests is at least 25 files. This amount is the least in a day considering the number of PPATs is more than 100. And the application is only buying and selling, not including the transfer of land rights by other means such as grants, inheritance, distribution of joint rights and auctions.

5. Limited HR support. With a large workload, it should be balanced with sufficient quantity and quality of human resources to support the timely completion of services. But the existing conditions in the field found that the quantity of human resources has not
supported the process of creating timely services. To carry out the service stages policy, each task is held by 1 person. As in the position of verifier of application files at the counter, the officer for registering the transfer of land rights and the officer analyzing the application file is only 1 person in each position. Even though this position is a position that gives influence to the course of the application file. In addition to carrying out routine service duties, the officer also has the additional task of being involved in the PTSL (Complete Systematic Land Registration) program committee which is an annual national program of the Ministry of Agrarian Affairs and Spatial Planning. So they have to divide their time between routine work and PTSL, almost every day carry out overtime to catch up on achieving service time but have not been able to fulfill the service within 5 days.

6. Executing officials and supervisory officials are not in place. In addition to recording the transfer on land certificates and books, the signature of the authorized official on the registration is also important for the validity of the process of transferring ownership rights to land, in this case the approval of the substance coordinator, section head and signature of the head of the land office. However, in carrying out services, there are times when the application file is constrained by an official who is not in place because he is carrying out official duties outside the office. If official duties last 1-2 days, the signature process is waiting for the official to attend. But if the official duty lasts for a week, the duty executor (Plt.) will assign the task of signing the application for land services. For this reason, it is important for the signing official to be in place if there are no official duties or urgent needs so as not to shorten the service process.

7. The land book is in the search process. The land book is the core of the activity of recording the transfer of ownership rights over land. All land parcels that have been registered with the land office or have been certified must have a land book kept at the land office. If there is a change in the certificate, it is also recorded in the land book. Like the service of transferring ownership rights to a plot of land where the parties agree through buying and selling, the subject of ownership of the changing land parcels must be recorded in the land book. Therefore in the recording stage there is a "land book bond" activity. The job of looking for a land book is quick and easy if the land book in question is available, but it will become an obstacle in the implementation of services if the land book has not been found. If this happens, the officer will temporarily stop or postpone the service process while still carrying out the search process. This land book is an important archive of the land office or the employees call it the "soul" of the land office. Therefore, it
must be considered and maintained properly so that it can improve the services of the land office in achieving the government's goal of creating responsible and best services.

The transfer of ownership rights for a plot of land with a black and white basis is facilitated through a service that involves the deed of sale and purchase. This service is regulated by the Head of BPN Number 1 of 2010 and is carried out in four stages in accordance with the established regulations. The utilization of the KKP application by the land office has resulted in the mandatory input of all services into said application, leaving no exceptions. Despite the physical form of the application file, it undergoes digital stages. In this particular application, once a stage has been accomplished, the only remaining task for the officer is to "click send" and proceed to the subsequent process until the entire process is finalized.

Public services adhere to various service principles, such as transparency, punctuality, and accountability. The transfer of ownership rights to a plot of land through a deed of sale and purchase involves a service that encompasses technical requirements specified by the Head of BPN Regulation No. 1 of 2010. The service's clarity is paramount, and any issues encountered during the application process are the responsibility of the work unit. In such cases, the work unit must promptly notify the coordinator or contact the applicant. From the perspective of the applicant, it is possible to track the status of one's application via the "Touch My Land" application, which can be self-downloaded.

The correlation between temporal certainty and accountability is evident. The provision of services in a timely manner is indicative of a sense of responsibility towards service delivery. The present investigation has revealed that the process of transferring ownership rights to a parcel of land through the recording of a deed of sale and purchase exceeded the predetermined timeframe of a maximum of 5 days. This phenomenon occurs due to the uneven distribution of human resources and their workload. In a given year, there are over 6,500 requests for the transfer of land rights that are recorded, requiring an average completion rate of approximately 25 application files per day. In addition to facilitating the transfer of land rights through the recording of sale and purchase deeds, the Substance Group for Maintenance of Land Rights, Space, and Development of PPAT is responsible for various other services that are integral to their primary duties.

The present investigation employs the implementation model proposed by van Horn and van Metter as an analytical framework. The selection of this model was based on the top-down approach of the policy, wherein the land office, as the policy executor, solely enforces policies that have been established at the central level. The present implementation model comprises six
variables, with particular attention being paid to the variables of policy achievement success, resources, implementing agency working methods, and community environmental conditions during the analysis.

1. Measuring Policy Objectives and Achievements

The assessment of implementation performance is based on the degree of effectiveness in attaining policy objectives, as well as its suitability within the socio-cultural context. Is the policy optimal? The implementation of the policy has been executed via a four-stage service model at the land office. In the process of developing a service for the transfer of ownership rights to a plot through a transaction agreement involving buying and selling, it is imperative that no stages are omitted. The land office adheres to the prescribed flow outlined in the KKP application, as it is mandatory for services to be processed through this platform.

The significant volume of registered applications necessitates that policy implementing agencies allocate additional time to ensure the provision of timely services. The prevalent culture in which government officials perform their duties in a nonchalant manner and exhibit a lack of concern towards societal expectations is not applicable in that context. The implementing agency frequently engages in overtime work to fulfill their workload. Despite the increased workload, the implementing agency will engage in overtime work on Saturdays. It is regrettable that the practice of deploying agents who frequently work beyond their regular hours is not supplemented by provisions for remuneration of overtime work. The implementing agent can accomplish the necessary services for the transfer of land ownership rights from the seller to the buyer within a timeframe of 3 to 4 weeks. This is due to the fact that the current HR support is inadequate to handle the substantial workload. This factor contributes to the policy being excessively idealistic and impractical to execute.

2. Resources

The adequacy of resources for policy implementation extends beyond the mere presence of a sufficient number of executing agents. It is imperative to acknowledge the significance of both financial and temporal support. The Substance Group responsible for the Maintenance of Land Rights, Space, and Development of PPAT utilizes a competent workforce to execute the recording of land rights transfers. The human resources in question exhibit a strong willingness and enthusiasm to fulfill their current workload, demonstrating a willingness to work beyond standard working hours and even on weekends without receiving additional compensation from their employer. The provision of financial resources is equally significant. The provision of
financial resources enables the land office to fulfill the requirement for work tools necessary for the implementation of policies. In addition to fulfilling the requirement of facilitating media support for policy implementation, it is imperative to allocate financial resources for the provision of overtime compensation to agencies responsible for executing said policies. In order to ensure adherence to policy, it is imperative to instill a sense of enthusiasm among employees towards working overtime. The allotted time frame for policy implementation is limited to a duration of five days. In the absence of any specification regarding the working days or calendar, it can be inferred that the service will be deemed to have commenced five days subsequent to the payment. The implementing agent is required to work on both Saturday and Sunday as part of their service duration.

3. Characteristics of Executing Agents

Agents tasked with implementing this policy must possess a comprehensive comprehension of land law, strive for optimal performance in executing their duties, and possess the ability to effectively communicate any impediments encountered during the implementation process to both their superiors and applicants. It is imperative for implementing agents to possess knowledge of land law as it pertains to legal procedures, specifically the transfer of ownership rights through the execution of a sale and purchase deed by the PPAT/PPATS. To successfully execute a task with a deadline of five days, the executing party must adhere to a punctual work schedule. According to findings in the field, the commencement of work for implementing agents is at 08:30 rather than 08:00. Despite their tendency to make up for lost time by working overtime, it would be advantageous to adhere to a more punctual start time in order to effect positive changes. If the signatory and the supervisor are not present in the office, the signature process for the certificate must be delayed. The frequency of extracurricular engagements among said officials correlates with an increase in the backlog of application files, as policy implementers persist in processing said files.

4. Community Environmental Conditions

The societal milieu is shaped by economic and socio-political factors, but it does not exert any impact on the execution of policies. It is imperative that the policy be executed in accordance with the established regulatory guidelines. The implementation of policy changes is typically a gradual process that necessitates regulatory modifications at the central level. To ensure that the execution of the policy remains unaffected by political and socio-economic circumstances.

Economic and social factors exert a substantial impact on the volume of registration. The research findings indicate a decrease in the volume of application files during the mid-year
period. This trend may be attributed to the prioritization of financial resources towards education, as this period coincides with the time when children typically commence schooling. The observed surge in volume of applications is concentrated at the onset and conclusion of the fiscal year. This phenomenon can be attributed to the apprehension among applicants regarding the potential escalation of tax base value in the succeeding year. Consequently, there is a heightened competition among applicants to expeditiously register their files towards the end of the current year and the commencement of the subsequent year, prior to the implementation of new tax regulations. The execution of the service policy pertaining to the transfer of ownership rights for a land parcel that has already been certified and is being transacted through the process of purchase and sale has encountered both impediments and facilitation during its course. The factors that pose challenges in the execution of the policy, namely

1. There is a lack of requirements in the application file
2. Availability of quantity of human resources
3. The volume of the application file
4. The acting officer and supervisory officer are not present

Meanwhile, things that support the transfer of land rights services run faster include:

1. The registered application file is complete with the attachment of the requirements
2. The CTF web application runs smoothly without problems
3. The necessary land books are available
4. Acting officers and supervisory officials are on site

CONCLUSION

The execution of the service policy pertaining to the conveyance of land ownership certificates based on the deed of sale and purchase at the land office is conducted in accordance with the relevant provisions, which entail four stages of service and a maximum service duration of five days. The land office adheres to the relevant provisions and implements a detailed workflow for each sub-stage of its services. It is imperative that every application is duly registered on the KKP application, and the officers are bound to adhere to the prescribed service stages as per the application. It is imperative to complete each stage of the process as any omission may have an impact on the quality of the service product. Based on the findings of the investigation, it can be concluded that the attainment of a 5-day service time has not been realized due to the current workload surpassing the available human resources. Despite the fact that human resources augment their working hours by engaging in overtime, they have not been
successful in delivering services in a timely manner. In order to receive assistance from agencies, it may be necessary to request additional human resources that meet specific criteria, as well as time resources that have been appropriately allocated to accommodate workload and changes in work methodologies. This approach has the potential to expedite service delivery and enhance the reliability of public services, thereby contributing to a positive transformation of their public image.

REFERENCE


