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Implementation of land deed official authority under Article 12(1) of Government Regulation No. 24 of 2016: A study of IPPAT and the Land Office in Malang

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ABSTRACT

This study aims to analyze administrative obstacles to the implementation of Article 12(1) of Government Regulation Number 24 of 2016, which establishes the working area of Land Deed Officials (Pejabat Pembuat Akta Tanah, PPAT) as encompassing one provincial territory, and to formulate optimization measures to ensure legal certainty in Malang City. The research gap lies in the limited availability of empirical studies identifying administrative obstacles based on the practices of PPATs and the Land Office. The novelty of this study lies in mapping implementation obstacles in terms of regulatory frameworks, resources, institutional arrangements, coordination, and land administration facilities. This study employs a socio-legal research method with a sociological juridical approach. Field research was conducted in Malang City involving 18 informants selected through purposive sampling, comprising 17 PPATs representing five subdistricts in Malang City and one Head of the Rights Determination and Registration Section at the Malang City Land Office. Primary data were collected through in-depth interviews and observations of land administration practices, while secondary data were obtained through documentation of relevant laws and regulations, books, journal articles, and other relevant documents. The data were analyzed qualitatively. The findings indicate that implementation remains suboptimal, as reflected in the continued reliance on regency/municipality-based working area boundaries in administrative practices, limited understanding of the regulatory changes among some PPATs, inadequate technical guidelines and administrative instruments, limitations in electronic systems and cross-regional data access, and challenges in workload management and service coordination at the Land Office. These conditions indicate a gap between legal norms and administrative practices that may create uncertainty in the exercise of PPAT authority. Accordingly, implementation should be optimized through the harmonization of implementing regulations, standardization of service procedures, adaptation of administrative and electronic systems to accommodate transactions across regencies and municipalities, enhanced interinstitutional outreach and coordination, and consistent application of the relevant legal provisions to ensure legal certainty for PPATs and the public.

Keywords: Land Deed Officials working area; Legal implementation; Land administration; Legal certainty; Land services.

1. INTRODUCTION

Land occupies a fundamental position in society because it serves as a place of residence, a source of livelihood, and an asset with social, economic, and legal value. In the Indonesian legal system, land control and utilization are based on Article 33(3) of the 1945 Constitution of the Republic of Indonesia, which stipulates that the land, waters, and natural resources contained therein are controlled by the state and utilized for the greatest possible prosperity of the people. This constitutional mandate is implemented through Law Number 5 of 1960 concerning Basic Agrarian Principles, particularly Article 19(1), which mandates the implementation of land

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registration to ensure legal certainty. Land registration is further regulated by Government Regulation Number 24 of 1997 concerning Land Registration, as amended by Government Regulation Number 18 of 2021 concerning Management Rights, Land Rights, Condominium Units, and Land Registration. These amendments do not encompass all provisions of Government Regulation Number 24 of 1997 but include, among other matters, adjustments to the provisions concerning the period for announcing physical and juridical data under Article 26(1), as well as related provisions under Article 45(1)(e). Accordingly, Government Regulation Number 18 of 2021 should be understood as amending specific provisions within the land registration framework rather than replacing the entire regulatory framework. In principle, land registration encompasses the collection, processing, recording, presentation, and maintenance of physical and juridical data to support legal certainty in land affairs (Nurasa & Mujiburohman, 2020).

In the implementation of land registration, a Land Deed Official (Pejabat Pembuat Akta Tanah, PPAT) is a public official authorized to draw up authentic deeds concerning specific legal acts involving land rights and ownership rights over condominium units. Under Article 1 point 24 of Government Regulation Number 24 of 1997, Land Deed Officials (PPATs) constitute an important component of the land registration mechanism. Article 37(1) of the same regulation stipulates that transfers of land rights and ownership rights over condominium units through sale and purchase, exchange, grants, contributions to companies, and other legal acts involving the transfer of rights, except transfers through auctions, may, in principle, be registered only if evidenced by a deed drawn up by an authorized Land Deed Official. Therefore, deeds executed by Land Deed Officials serve as the basis for the Land Office to process changes to juridical data resulting from legal acts involving land. The performance of duties by Land Deed Officials is not limited to serving the interests of the parties but also supports orderly land administration and legal certainty. In exercising their authority, Land Deed Officials are required to act professionally, independently, impartially, carefully, and diligently when examining documents and data relating to the land object and the parties before executing a deed (Suwondo & Saputra, 2019).

One important aspect of the performance of duties by Land Deed Officials is the determination of their working areas. Before the regulatory amendment in 2016, Article 12(1) of Government Regulation Number 37 of 1998 concerning the Regulation on the Position of Land Deed Officials stipulated that a Land Deed Official's working area covered the jurisdiction of one regency or municipality Land Office. This provision was amended through Government Regulation Number 24 of 2016 concerning Amendments to Government Regulation Number 37 of 1998, which revised Article 12(1) to state that “the working area of a Land Deed Official shall comprise one provincial territory.” Government Regulation Number 24 of 2016 also introduced

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Article 12(3), which stipulates that further provisions concerning the working areas of Land Deed Officials shall be regulated by a Ministerial Regulation, as well as Article 12A, which establishes that a Land Deed Official's office must be located in a regency or municipality within the province forming part of the official's working area. Accordingly, this amendment distinguishes the scope of a Land Deed Official's working area, which encompasses an entire province, from the location of the official's office, which remains within a regency or municipality. The amendment was intended to enhance the role of Land Deed Officials and improve public services in land registration. Nevertheless, its implementation must be considered alongside the relevant provisions governing office location, administrative procedures, and land registration authority.

The expansion of the working areas of Land Deed Officials has administrative implications for land services involving transactions across regencies and municipalities. A working area encompassing an entire province requires effective coordination between Land Deed Officials and Land Offices, particularly in certificate examination, verification of land records, validation of physical and juridical data, and registration of transfers of rights. The implementation of this provision is also associated with the readiness of electronic service systems, access to land data, interagency coordination mechanisms, and consistency in service standards. Without adequate adjustments to administrative instruments, the expansion of working areas may create a gap between normative provisions and actual service practices. Lestari highlights the need to adjust administrative supervision following the expansion of the working areas of Land Deed Officials (Lestari, 2021), while Lutfiyani and Aminah examine the implications of changes to working areas for the performance of their duties (Lutfiyani & Aminah, 2023). These previous studies indicate the importance of examining not only the applicability of legal norms but also the readiness of the administrative mechanisms required for their implementation.

These implementation issues require careful analysis that distinguishes the absence of regulations from a lack of clarity in operational guidelines. Article 12(3) of Government Regulation Number 24 of 2016 explicitly delegates further regulation of the working areas of Land Deed Officials to a Ministerial Regulation. However, the existence of this delegation does not, in itself, establish that all regulations or administrative instruments relating to the performance of their duties are unavailable. The relevant research question is whether the applicable regulatory framework, including regulations concerning appointment, relocation of office, land registration, and land services, provides adequate operational guidance for implementing a working area that encompasses one province. Afrida's research identifies obstacles relating to service systems and implementation guidelines (Afrida, 2021), while Karmani, Budiartha, and Astiti discuss implementation issues arising from the expansion of the working areas of Land Deed Officials

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(Karmani, Budiartha, & Astiti, 2022). Therefore, any claim regarding a regulatory vacuum must be based on an examination of the relevant ministerial regulations and administrative instruments. Meanwhile, unclear procedures, system limitations, and inconsistencies in implementation should be identified as operational issues that can be investigated empirically.

Previous studies also indicate that the implementation of province-wide working areas for Land Deed Officials continues to encounter practical challenges. Fellisia and Aminah highlight the need for regulatory alignment, infrastructure readiness, and stronger coordination and supervision (Fellisia & Aminah, 2024). Although these studies provide a foundation for understanding implementation issues, findings from other research locations cannot automatically be taken as evidence of identical conditions in Malang City. Accordingly, this study uses previous research as an analytical foundation, while the existence and nature of administrative obstacles in Malang City must be established through documents, observations, and informant statements collected during the present research. This distinction is important to ensure that conclusions regarding the gap between das sollen the normative requirement that a Land Deed Official's working area encompass one province and das sein the actual administrative implementation in the field are not based solely on generalizations drawn from previous studies.

Based on the preliminary research survey, some appointment documents for Land Deed Officials still specify a working area limited to Malang City, even though Article 12(1) of Government Regulation Number 24 of 2016 normatively establishes that a Land Deed Official's working area encompasses one provincial territory. It was also found that the Malang City Land Office had not received applications for the registration of transfers of rights based on deeds executed by Land Deed Officials concerning land located outside Malang City. Similarly, Land Deed Officials based in Malang City had not executed deeds concerning land located beyond the city's boundaries. In addition, Administrative Court Decision Number 20/G/2020/PTUN.PBR demonstrates the application of the provisions governing the working areas of Land Deed Officials under Article 12(1) of Government Regulation Number 24 of 2016 in a case involving the execution of a deed outside the regency or municipality in which the official's office was located. These circumstances indicate that the implementation issues concern not only Land Deed Officials but also the administrative practices of Land Offices as institutions responsible for processing legal instruments executed by these officials. This study adopts an empirical approach involving 17 Land Deed Officials affiliated with the Indonesian Association of Land Deed Officials (IPPAT) and representing five subdistricts in Malang City, as well as one informant from the Malang City Land Office, namely the Head of the Rights Determination and Registration Section. The informants' accounts are used to examine the implementation of the provisions governing the

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working areas of Land Deed Officials in Malang City, particularly in relation to deed execution and the registration of transfers of land rights.

Based on the foregoing discussion, research into the implementation of the authority of Land Deed Officials under Article 12(1) of Government Regulation Number 24 of 2016 is particularly important in the context of Land Deed Officials and the Land Office in Malang City. Previous studies have extensively examined the applicability and effectiveness of expanding the working areas of Land Deed Officials. However, further empirical investigation is needed into the administrative obstacles encountered by Land Deed Officials and Land Offices in implementing a working area encompassing one provincial territory, as well as concrete measures to optimize implementation and ensure legal certainty. Accordingly, this study examines not only the normative applicability of the relevant provisions but also their practical implementation through socio-legal research employing a sociological juridical approach. This focus is necessary to identify inhibiting factors associated with policy standards and objectives, resources, the characteristics of implementing institutions, communication and coordination, implementers' attitudes, and the surrounding environment. The findings are expected to provide a basis for aligning legal norms with land administration practices so that the expansion of the working areas of Land Deed Officials can be implemented more consistently and legal certainty can be strengthened for both Land Deed Officials and the public.

2. RESEARCH METHODS

This study employed a socio-legal research method with a sociological juridical approach and was conducted in Malang City, focusing on Land Deed Officials (Pejabat Pembuat Akta Tanah, PPATs) and the Malang City Land Office. The informants were selected using purposive sampling and consisted of 17 PPATs representing five subdistricts in Malang City and one Head of the Rights Determination and Registration Section at the Malang City Land Office, resulting in a total of 18 informants. Primary data were collected through in-depth interviews using interview guidelines and a recording device, as well as observations of land document examinations, verification of the parties' identities, administrative procedures prior to registration, receipt of documents submitted by PPATs, and the use of electronic systems at the Land Office. Field documentation included research permits, evidence of research implementation, and relevant administrative documents. Secondary data were obtained from primary legal materials in the form of legislation, including Law No. 5 of 1960, Government Regulation No. 37 of 1998 as amended by Government Regulation No. 24 of 2016, Government Regulation No. 24 of 1997 as amended by Government Regulation No. 18 of 2021, Regulation of the Minister of Agrarian Affairs and Spatial

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Planning/Head of the National Land Agency No. 2 of 2018, Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No. 17 of 2020, and Decree of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No. 112/KEP-4.1/IV/2017. Secondary legal materials also included books, journal articles, and previous research findings. The fieldwork was conducted from June 10 to July 15, 2026.

The data were analyzed qualitatively through a series of steps, including examining data completeness and relevance, coding the data according to the themes of working area, constraints, and PPATs, classifying the data, and interpreting the findings to draw conclusions deductively. Data validity was assessed through triangulation by comparing the results of interviews, observations, field documentation, and relevant legal materials. The analysis was guided by Van Meter and Van Horn's policy implementation theory, Soerjono Soekanto's legal effectiveness theory, and Jan Michiel Otto's legal certainty theory. The research was conducted on the basis of research permits obtained from the relevant authorities and in accordance with procedures concerning informant consent, data confidentiality, and applicable ethical requirements at the institution or research site. The description of consent procedures and research ethics should be adjusted to reflect the procedures actually implemented and the supporting documentation available.

3. RESULTS AND DISCUSSION

Administrative Constraints Faced by Land Deed Officials (PPAT) in the Implementation of Article 12(1) of Government Regulation Number 24 of 2016 in Malang City

The findings indicate that the implementation of Article 12(1) of Government Regulation No. 24 of 2016 concerning the working area of Land Deed Officials (Pejabat Pembuat Akta Tanah, PPAT) within a single provincial territory has not been fully optimized in land administration practices in Malang City. This provision expanded the working area of PPATs, which had previously been limited to the jurisdiction of a regency/municipality Land Office, to encompass an entire province. The amendment was intended to enhance the role of PPATs and improve public services in land registration. However, interviews with 17 PPATs revealed that none of them had ever drawn up a deed concerning land located outside Malang City. This finding indicates that the cross-regency/municipality authority had not been exercised by the group of PPATs interviewed. Nevertheless, this finding cannot be generalized to all PPATs in Malang City without data establishing the extent to which the sample represents the relevant population of PPATs. Within the scope of this study, the results demonstrate a gap between the authority established by legal norms (das sollen) and actual land administration practices (das sein). The main issue does not lie

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in the absence of a legal provision granting such authority, but rather in the lack of adequate administrative and institutional support for exercising that authority across regional boundaries (Lutfiyani & Aminah, 2023).

First, communication and understanding of policy standards and objectives constitute significant obstacles. Based on interviews with 17 PPATs, 12 respondents were aware of the change extending the working area of PPATs to an entire provincial territory, while five respondents were unaware that the provision had taken effect. When asked about the purpose of the change, as addressed in the fourth question of the interview guide, seven respondents understood that the change was intended to enhance the role of PPATs and improve public services, seven did not know its purpose, and three offered their own interpretations, including associating the change with aligning the working areas of PPATs with the territorial jurisdiction of Notaries. These data are presented in Table 1. The findings demonstrate that awareness of the existence of a legal provision does not necessarily entail an understanding of its policy objectives. Under Van Meter and Van Horn's policy implementation theory, this condition relates to interorganizational communication and policy standards and objectives. Information regarding changes in authority must be communicated clearly and consistently so that implementers not only know that a legal provision exists but also understand its objectives and the implications of its implementation. Accordingly, inadequate dissemination and technical guidance may perpetuate practices that remain oriented toward regency/municipality boundaries (Fildzah & Aminah, 2023).

Table 1. PPATs' Knowledge of Changes to Their Working Areas and the Objectives of the Policy

Aspect Examined	Response Category	Number of Respondents
Knowledge of changes to the working area	Aware of the change	12
	Unaware of the change	5
Understanding of the objectives of the change	Understands the policy objectives	7
	Does not know the policy objectives	7
	Provides an independent interpretation	3
Total respondents		**17**

Source: Primary data processed from interviews with 17 PPATs in Malang City.

The figures in the table represent responses to two different questions; therefore, each aspect accounts for 17 respondents. The category of independent interpretation is retained separately because such responses cannot automatically be equated with an understanding consistent with the policy objectives. This classification is based on the substance of the interview responses as reported.

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Second, legal instruments and administrative procedures present further obstacles. Article 12(1) of Government Regulation No. 24 of 2016 provides a legal basis for extending the working area of PPATs to an entire provincial territory, while Article 12(3) mandates further regulation through a ministerial regulation. Accordingly, the identified issues must be distinguished between the existence of a legal basis and the availability of operational guidelines. An examination of Government Regulation No. 24 of 2016, Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No. 20 of 2018, and Regulation of the Head of the National Land Agency No. 8 of 2012, as discussed in the thesis, indicates that these provisions address aspects of the PPAT office, appointment, and land registration procedures but do not provide a specific, comprehensive mechanism for exercising cross-regency/municipality authority within a single province. In addition, the PPAT appointment documents examined continued to specify Malang City as the place of office without explicitly indicating a provincial working area. Accordingly, the findings are more appropriately understood as reflecting incomplete operational instruments and administrative inconsistencies rather than the absence of a legal basis for expanding PPATs' working areas. This conclusion regarding operational guidelines is limited to the documents examined in this study and should not be interpreted as a claim that no other relevant administrative provisions exist. Under Van Meter and Van Horn's theory, this condition relates to policy standards and objectives as well as policy resources, because legal norms require procedures that implementers can apply in practice (Afrida, 2021).

Third, electronic systems and access to land data constitute additional obstacles. Interviews with PPATs and information provided by the informant from the Malang City Land Office indicate that the land administration service systems in use remain oriented toward the jurisdiction of each Land Office. The PPATs interviewed reported limitations in using their service accounts to conduct certificate checks, submit deeds online, and access other electronic land services concerning properties located outside Malang City. These findings are primarily based on interview accounts and are supported by documentation of the service systems presented in the thesis. Accordingly, the reported access restrictions are understood as conditions reported by respondents and observed within the scope of this study, rather than as claims concerning every configuration of the ATR/BPN system or its internal technical specifications. These limitations indicate that the normative expansion of authority has not been fully supported by administrative facilities that enable cross-regional implementation. Under Van Meter and Van Horn's theory, this issue primarily concerns policy resources, particularly technological infrastructure and access to information, which determine implementers' ability to translate legal authority into actual services. This finding is consistent with Afrida (2021), who identified the readiness of service systems and

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the availability of implementation guidelines as important factors in implementing a province-wide working area for PPATs.

Fourth, institutional characteristics and supervisory mechanisms also present challenges. Based on the institutional regulations discussed in the thesis, the functions of the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency (ATR/BPN) at the regional level are carried out through Provincial Offices of the National Land Agency (BPN) and Land Offices at the regency/municipality level. This structure indicates that day-to-day land services continue to be administered through offices with their respective territorial jurisdictions, while policies and system adjustments applicable nationally cannot be determined unilaterally by the Malang City Land Office. The guidance and supervision of PPATs must also be situated within the framework of the authority of the Ministry of ATR/BPN, as regulated by Government Regulation No. 24 of 2016 and Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No. 2 of 2018. Accordingly, regional Land Offices carry out service and supervisory functions within their respective authority and established procedures, whereas policy changes, system standards, and cross-regional administrative mechanisms require coordination with the competent institutional authorities. The findings reveal a discrepancy between the expansion of PPATs' working areas at the normative level and land service practices that remain based on regency/municipality jurisdictions. From the perspective of Van Meter and Van Horn's theory, this condition relates to the characteristics of implementing agencies, including the distribution of authority, organizational structure, and working procedures. Therefore, optimizing implementation cannot be the sole responsibility of PPATs or the Malang City Land Office; rather, it requires coordinated institutional adjustments and service standards (Lestari, 2021).

Fifth, interagency coordination and implementer attitudes constitute further obstacles. Implementing a province-wide working area requires coordination among PPATs, the Land Office responsible for the location of the land, and relevant agencies involved in subsequent administrative processes, including regional tax matters such as the Land and Building Rights Acquisition Duty (Bea Perolehan Hak atas Tanah dan Bangunan, BPHTB). The interviews indicate that differences in service mechanisms and the lack of clear cross-regional procedures have raised concerns about the smooth processing of data checks, validation of tax obligations, and acceptance of deeds during land registration. Respondents' attitudes toward the expansion of the working area are summarized in Table 2.

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Table 2. Attitudes of 17 PPATs toward the Expansion of Their Working Areas to a Single Provincial Territory

Response Category	Meaning of Responses Based on the Interviews	Number of Respondents
Agree with conditions	Support the expansion of the working area, provided that technical regulations, integrated administrative systems, and clear interagency coordination are available	8
Disagree	Consider the change unnecessary or express concerns about its implications for due diligence, data security, taxation, and supervision	8
Conditional/neutral	Do not reject the change in principle but consider its implementation premature without operational guidelines and administrative readiness	1
Total		**17**

Source: Primary data processed from interviews with 17 PPATs in Malang City.

This distribution relates to the interview question concerning respondents' views on changes to the working area. In the thesis, the responses are categorized according to whether respondents supported the change, opposed it, or accepted it subject to administrative readiness. The "agree with conditions" category does not mean that respondents claimed cross-regional implementation was already taking place; rather, it indicates support for the change subject to certain requirements. Conversely, the "disagree" category reflects objections based on perceived risks or practical considerations, while the "conditional/neutral" category indicates acceptance of the legal provision in principle but not of its implementation in the absence of technical support. This classification follows the substance of the reported responses and is not intended to measure the attitudes of all PPATs in Malang City.

One informant stated, "PPATs do not dare to operate outside that area because, if they do, their deeds risk being rejected." This statement indicates that implementers' caution is associated with uncertainty regarding the acceptance of deeds during subsequent administrative processes. Such caution should therefore not automatically be interpreted as resistance to the legal provision; it may also represent a response to professional and administrative risks. Under Van Meter and Van Horn's theory, this situation relates to implementer disposition and interorganizational communication. Implementers may support the objectives of a policy but remain reluctant to apply it when procedures, coordination mechanisms, and administrative consequences are unclear. Accordingly, certainty in implementation requires uniform guidelines and accountable coordination mechanisms (Akbar et al., 2024).

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Based on these findings, the obstacles to implementing Article 12(1) of Government Regulation No. 24 of 2016 in Malang City stem from inconsistencies between the legal authority established by the regulation and the mechanisms available to implement it. Within Van Meter and Van Horn's framework, inconsistent understanding reflects communication problems; limited operational guidance and electronic systems relate to policy resources; regency/municipality-based service and supervisory structures concern institutional characteristics; PPATs' reluctance reflects issues of implementer disposition; and the absence of clear cross-regional procedures demonstrates the need for more explicit policy standards and objectives. These five aspects are interrelated and should not be treated as isolated obstacles. Accordingly, improvement efforts should focus on reviewing and harmonizing relevant guidelines, establishing cross-regency/municipality service procedures, adjusting electronic systems and data access, clarifying the distribution of authority and supervisory responsibilities, and strengthening outreach to PPATs. These measures are necessary to ensure that the expansion of PPATs' working areas is not merely recognized at the normative level but can also be implemented through consistent administrative processes that provide legal certainty for both PPATs and the public.

Efforts to Optimize the Implementation of Article 12(1) of Government Regulation Number 24 of 2016 for Ensuring Legal Certainty

Based on the research findings, optimizing the implementation of Article 12(1) of Government Regulation No. 24 of 2016 requires aligning the normative provisions governing the working areas of Land Deed Officials (Pejabat Pembuat Akta Tanah, PPATs) with the land administration mechanisms necessary to support their implementation. Interviews with 17 PPATs selected through purposive sampling from five subdistricts in Malang City and one informant from the Malang City Land Office indicate that the expansion of PPATs' working areas to encompass an entire provincial territory has not yet been fully implemented in practice. The identified obstacles include limited access to electronic systems, unclear cross-regency/municipality service procedures, and administrative practices that remain oriented toward the jurisdiction of the local Land Office. These findings reflect the circumstances of the informants and the research location and are not intended to represent all PPATs in East Java or all Land Offices in Indonesia. Accordingly, optimization efforts should focus on regulatory evaluation, improvements to service procedures, stronger institutional coordination, and greater certainty in the exercise of PPATs' authority. This approach is consistent with Jan Michiel Otto's perspective on legal certainty, which emphasizes the importance of alignment between the existence of legal norms, understanding of those norms, consistency in their application, and the actual implementation of law in practice (Bedner et al., 2012).

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The first measure is to inventory, evaluate, and harmonize regulations concerning PPATs' working areas. Article 12(1) of Government Regulation No. 24 of 2016 stipulates that a PPAT's working area encompasses an entire provincial territory, while Article 12(3) provides a basis for further regulation of PPATs' working areas through a ministerial regulation. These provisions should be interpreted in conjunction with the implementing regulations and official guidelines already issued, rather than immediately being treated as evidence that a new regulation must be enacted without further examination. Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No. 2 of 2018 concerning the Guidance and Supervision of Land Deed Officials and Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No. 20 of 2018 concerning Procedures for Examinations, Internships, Appointments, Reappointments, and Extensions of the Terms of Office of Land Deed Officials should be examined in relation to the regulatory needs identified in this study. The evaluation should also cover technical provisions on land registration, including Regulation of the Minister of State for Agrarian Affairs/Head of the National Land Agency No. 3 of 1997 and its amendments, while verifying the number, title, and current validity of each regulation against official legal documentation and information networks (Jaringan Dokumentasi dan Informasi Hukum, JDIH). If the evaluation identifies regulatory gaps or ambiguities, the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency (ATR/BPN) may consider developing or refining the relevant implementing instruments. Matters requiring evaluation include service procedures for land located in other regencies/municipalities within the same province, verification of physical and juridical data, deed submission, coordination among Land Offices, and the guidance and supervision of PPATs. This proposal constitutes a policy recommendation based on the research findings, rather than a claim that Article 12(3) expressly requires all these mechanisms to be regulated in detail. Its implementation should take into account the principles governing the establishment of legislation under Law No. 12 of 2011 concerning the Establishment of Legislation, as amended, particularly clarity of purpose, appropriateness of regulatory content, and the feasibility of effective implementation.

The second measure is to improve the consistency of government action by evaluating service standards and adjusting land administration systems. The findings indicate that services at the Malang City Land Office remain oriented toward regency/municipality boundaries, while PPATs' access to electronic administrative systems does not yet fully support the exercise of cross-regional authority. This situation calls for the Ministry of ATR/BPN to evaluate procedures for certificate verification, deed acceptance, and registration of transfers of land rights to ensure that their implementation is consistent with the provisions governing PPATs' working areas. The East

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Java Provincial Office of the National Land Agency and the relevant Land Offices may be involved in mapping operational obstacles, testing procedures, and developing coordination mechanisms. As a policy recommendation, the Ministry of ATR/BPN could develop or adjust its electronic systems to enable PPATs to access services in accordance with their lawful authority and access rights, including services relating to land located in other regencies/municipalities within the same province. Implementation of this proposal should be preceded by an assessment of infrastructure readiness, system interoperability, human resource capacity, implementation costs, and testing requirements before broader deployment. System integration should also incorporate user authentication, access restrictions based on duties and authority, user activity logging, secure data exchange, and mechanisms for handling errors and complaints. Personal data protection must be ensured in accordance with Law No. 27 of 2022 concerning Personal Data Protection, while the issuance of electronic documents in land registration activities must take into account Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No. 3 of 2023 concerning the Issuance of Electronic Documents in Land Registration Activities. This regulation provides a framework for operating electronic systems in land registration but does not, by itself, establish that cross-regency/municipality access for PPATs is already available. Therefore, the allocation of responsibilities, security standards, access supervision, and coordination mechanisms between the office providing the service and the Land Office responsible for the location of the land must be clearly defined. In this way, the development of electronic systems would not only expand access but also preserve the accuracy of verification and the accountability of land administration.

The third measure is to improve access to legal information and propose public outreach concerning PPATs' working areas. The interview findings indicate that relationships between members of the public and PPATs are influenced by trust and recommendations, while the available data do not establish that public understanding of the expansion of PPATs' working areas to an entire provincial territory is widespread or uniform. This study did not include members of the public as a separate group of informants. Therefore, public understanding is not presented as an empirical finding representative of the entire population of Malang City but rather as an issue requiring further attention through policy recommendations. The Ministry of ATR/BPN, the East Java Provincial Office of the National Land Agency, the Malang City Land Office, and professional organizations representing PPATs, including IPPAT, could consider conducting outreach through official websites, JDIH platforms, professional forums, and legal education programs. The materials should explain the scope of PPATs' working areas, the distinction between their place of office and working area, and the procedures for providing services

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concerning land located in other regencies/municipalities. Such outreach is a recommendation proposed by the researcher and is not a specific obligation expressly imposed by Article 12(1) of Government Regulation No. 24 of 2016. In implementing this proposal, the information disseminated must be consistent with applicable regulations and procedures to prevent the public from developing an inaccurate understanding of service availability. These efforts should also be undertaken alongside administrative improvements, since information about the expansion of working areas will have limited practical value if service procedures and system access do not support its implementation. The principles of legal certainty, transparency, and accessibility of public services reflected in Law No. 25 of 2009 concerning Public Services may serve as a basis for improving the quality of information and public access to services.

The fourth measure is to promote consistent application of the law through independent and impartial judicial mechanisms when disputes arise. Within the scope of this study, which focused on PPATs and the Malang City Land Office, no disputes concerning the implementation of PPATs' working areas that had been examined by the Administrative Court (Pengadilan Tata Usaha Negara, PTUN) were identified in the data obtained. This statement is limited to the findings of this study and should not be interpreted as establishing that similar disputes have never occurred in Malang City or elsewhere. Should disputes arise in the future, their resolution must be based on the applicable regulations, the facts of the case, the subject matter of the dispute, and the jurisdiction of the relevant judicial institution. In this context, the distinction between a PPAT's place of office and working area should be considered when assessing issues of authority, while taking into account other relevant legal provisions. The Pekanbaru Administrative Court Decision No. 20/G/2020/PTUN.PBR and the subsequent proceedings culminating in Supreme Court Decision No. 337 K/TUN/2021 may serve as comparative references for understanding the relationship between PPATs' authority and judicial review of administrative actions. However, that case is not identical to the administrative issues identified in Malang City and therefore cannot automatically be used to conclude that all implementation issues in Malang City have the same legal resolution. The relevance of the decision to this study lies in the importance of legal assessments based on applicable provisions and the specific facts of each case. Accordingly, the judiciary serves as a mechanism for dispute resolution within its jurisdiction, rather than as a substitute for the Ministry of ATR/BPN's role in formulating and implementing land administration policies.

The fifth measure is to ensure the concrete implementation of court decisions in accordance with the scope of their operative provisions and applicable law. Article 116 of Law No. 5 of 1986 concerning Administrative Courts, as amended and most recently by Law No. 51 of

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2009, regulates the mechanisms for implementing Administrative Court decisions that have become legally binding. This provision constitutes an existing legal basis, whereas the proposed establishment of internal coordination mechanisms and the preparation of uniform administrative guidelines are recommendations made by the researcher. The Ministry of ATR/BPN and the relevant Land Offices should follow up on court decisions in accordance with their operative provisions, the parties bound by them, and the obligations legally imposed on the relevant government officials or agencies. This does not mean that every decision concerning PPATs automatically requires changes to all land service procedures throughout Indonesia. Decision No. 20/G/2020/PTUN.PBR and the subsequent proceedings culminating in Supreme Court Decision No. 337 K/TUN/2021 demonstrate the importance of the relationship between dispute resolution and administrative action following the delivery of a judgment. Nevertheless, the use of these decisions in this study is limited to analyzing judicial review and administrative implementation; they are not presented as evidence that all issues concerning PPATs' working areas in Malang City have been resolved through those decisions. Accordingly, the recommendation is that the relevant institutions evaluate their procedures for following up on court decisions, clarify responsibility for implementation, document the actions taken, and ensure compliance with the operative provisions of the decisions and applicable legislation.

Based on the overall research findings, optimizing the implementation of Article 12(1) of Government Regulation No. 24 of 2016 requires regulatory evaluation, adjustments to service standards, stronger coordination among Land Offices, the development of secure and accountable electronic systems, and improved access to legal information. The Ministry of ATR/BPN should evaluate the need for regulatory and service system adjustments, while the East Java Provincial Office of the National Land Agency, the relevant Land Offices, and IPPAT may contribute, within their respective authority, to coordination, service delivery, professional guidance, and information dissemination. The judiciary should continue to resolve disputes independently when cases are brought before it, while implementation of court decisions remains the responsibility of the government officials or agencies upon whom obligations are imposed under the operative provisions and applicable law. This allocation of responsibilities directs the recommendations toward achieving consistency between legal norms and administrative practice, rather than focusing solely on the enactment of new regulations. The expected outcomes are more consistent exercise of PPATs' authority, clearer service procedures, electronic systems that securely support cross-regency/municipality services, and greater legal certainty for PPATs and the public. These recommendations are based on research conducted in Malang City; their application in other areas therefore requires further evaluation in light of local institutional and administrative conditions.

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4. CONCLUSION

Based on the research findings, it can be concluded that the implementation of Article 12(1) of Government Regulation No. 24 of 2016 concerning the expansion of the working areas of Land Deed Officials (Pejabat Pembuat Akta Tanah, PPATs) to encompass an entire provincial territory in Malang City has not been fully optimized because the expansion of legal authority has not been accompanied by adequate administrative and institutional adjustments. Interviews with 17 PPATs selected through purposive sampling from five subdistricts in Malang City and one informant from the Malang City Land Office revealed that none of the 17 PPAT respondents had ever drawn up a deed concerning land located outside Malang City. In addition, 12 respondents were aware of the change in PPATs' working areas, while the remaining five were unaware of it. Respondents also demonstrated varying levels of understanding of the policy objectives. The main obstacles identified included unclear implementation guidelines, limited dissemination of information and understanding of the relevant provisions, electronic service systems and access to land data that remained oriented toward regency/municipality boundaries, institutional and workload-related issues, ineffective interinstitutional coordination, and PPATs' cautious attitudes regarding the administrative acceptance of deeds. These findings indicate a gap between the normative expansion of PPATs' authority and its implementation in practice. However, the findings are limited to the respondents and institutional settings examined in this study and therefore cannot be generalized to all PPATs in Malang City or East Java Province.

Optimizing the implementation of Article 12(1) requires coordinated measures to align the legal framework with administrative practices. The first priority is to evaluate and harmonize the relevant regulations and clarify the procedures for transactions involving land located in different regencies/municipalities within the same province. The second priority is to adjust Land Office service standards, administrative documents, and electronic systems, including access to land data, certificate verification, deed reporting, and electronic mortgage services. The third priority is to strengthen coordination among the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency (ATR/BPN), the East Java Provincial Office of the National Land Agency, the relevant Land Offices, and the Indonesian Association of Land Deed Officials (Ikatan Pejabat Pembuat Akta Tanah, IPPAT), accompanied by enhanced dissemination of information and improved access to legal information for PPATs and the public. Furthermore, consistent judicial interpretation of the law and the implementation of final and legally binding court decisions should support, rather than replace, administrative improvements by the competent authorities. These measures are intended to align legal provisions with their practical implementation and thereby strengthen legal certainty for PPATs and the public. Their implementation should be evaluated in

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accordance with each institution's respective authority and the administrative conditions identified in this study.

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