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Regulatory Grammar and Administrative Burden in Indonesia's Public Service Innovation Competition

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ABSTRACT
Indonesia's Public Service Innovation Competition (Kompetisi Inovasi Pelayanan Publik, KIPP) was designed to identify, reward, and diffuse public service innovations. Participation, however, was mediated by proposal formats, documentary evidence, information-system requirements, deadlines, and administrative screening. This study examined how that regulatory architecture created potential administrative burden for participating public organizations. We integrated Institutional Grammar with the administrative burden framework and conducted qualitative-quantitative content analysis of KIPP regulations and annual implementation guidelines issued between 2014 and 2025. The corpus contained 1,023 institutional statements. Each statement was unitized and coded for Attribute, Deontic, Aim, Condition, and Or Else, then mapped to learning, compliance, and psychological-cost exposure using a predefined multi-label codebook. The coding identified 616 statements containing administrative conditions. Learning-cost exposure appeared in 235 statements and compliance-cost exposure in 182, while 40 statements contained at least one psychological-cost exposure. Full ADICO rules were uncommon, whereas procedural requirements and conditionalities were widespread. Granular examination showed that burden was produced less by sanction density than by the cumulative work of translating an innovation into a standardized, evidence-supported, system-readable proposal. The study extended administrative burden research to intra-governmental policy instruments and showed how documentary capacity could become part of the effective selection mechanism. The findings supported regulatory simplification, stable proposal formats, clearer distinctions between mandatory and optional evidence, and curative administrative review before substantive exclusion.

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1. INTRODUCTION

Public sector innovation is now treated as a routine concern of public management rather than an exceptional departure from bureaucracy. Research has moved from asking whether public organizations can innovate to examining the organizational, institutional, and collaborative conditions under which innovation emerges, survives, and diffuses (Hartley, 2005; de Vries et al., 2016; Demircioglu & Audretsch, 2017). Innovation competitions and awards are one institutional response to this agenda. They identify practices that governments wish to recognize, convert local experience into comparable submissions, and create visible portfolios from which other organizations may learn. Yet competitions also require commensuration. A diverse set of service practices must be translated into categories, proposal fields, evidence standards, and evaluation criteria before evaluators can compare them.

Indonesia offers an unusually sustained case of this governance model. The Ministry of Administrative and Bureaucratic Reform (Kementerian PANRB) began the Public Service Innovation Competition, or KIPP, in 2014 as part of the One Agency One Innovation agenda. Across successive ministerial regulations and annual guidelines, KIPP developed from a relatively compact competition framework into a more differentiated system of online submission, administrative screening, proposal evaluation, verification, replication, dissemination, and, in later instruments, objection and withdrawal procedures (Kementerian PANRB, 2014, 2018, 2021a, 2023, 2025). Existing studies show that KIPP has become an important source for tracing innovation patterns in Indonesia and has encouraged substantial participation across levels of government (Pratama, 2020; Muluk & Pratama, 2021). At the same time, innovation capacity remains uneven across organizations and regions, and the Indonesian literature has repeatedly identified organizational capability, leadership, institutional support, and sustainability as consequential conditions (Kusumasari et al., 2019; Hilmawan et al., 2023).

This combination creates a practical tension. KIPP is intended to recognize service innovation, but access to substantive evaluation depends on administrative translation. Participating organizations must understand the applicable category, interpret annual guidance, complete a standardized proposal, comply with word limits, upload

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accessible evidence, use the SINOVIK information system, and pass administrative screening. These requirements may be defensible individually. Cumulatively, however, they can create a form of paperwork competition in which documentary capacity affects whether substantive innovation becomes visible to the state. The issue is particularly relevant where public organizations differ in staffing, evaluation routines, digital capability, and prior experience with national competitions.

Administrative burden provides a vocabulary for examining these frictions. Moynihan et al. (2015) distinguish learning costs, compliance costs, and psychological costs in encounters with government, while Herd and Moynihan (2018) show how such costs can be produced through policy design rather than treated as accidental implementation noise. Later research demonstrates that burdens can be amplified or mitigated by cognitive resources, administrative literacy, organizational practices, and the material or digital infrastructure through which rules are encountered (Christensen et al., 2020; Döring & Madsen, 2022; Nisar & Masood, 2024). Most of this literature centers on citizen-state interactions, but the framework is not logically restricted to citizens. Public employees and public organizations can also be targets of state-created requirements, especially when they seek access to grants, accreditation, awards, regulatory approvals, or centrally administered programs (Bozeman & Youtie, 2020; Halling & Baekgaard, 2024).

The second analytical problem concerns how burdens are embedded in text. Administrative burden scholarship often begins from experienced costs or observable procedures. Institutional Grammar provides a complementary route by decomposing policy statements into the actor to whom a statement applies, the prescriptive force of the statement, the action required, the conditions under which it applies, and any consequence attached to noncompliance (Crawford & Ostrom, 1995; Siddiki et al., 2011; Frantz & Siddiki, 2021). This makes it possible to identify where an administrative requirement originates and how it is linguistically connected to conditions and consequences. It also discourages a common analytical shortcut: treating every unfavorable outcome as a formal sanction. Under a strict Institutional Grammar reading, an Or Else component is present only when the consequence is explicitly linked to noncompliance with the institutional statement (Frantz & Siddiki, 2022).

Research on Indonesian public service innovation has not yet combined these perspectives. Prior KIPP studies have mapped innovation types, winners, determinants, and development effects, but have not examined the micro-design of competition rules as a source of administrative burden (Pratama, 2020; Muluk & Pratama, 2021; Hilmawan et al., 2023). This article addresses that gap by asking three questions: (1) how are prescriptive cues, conditions, and explicit consequences distributed across KIPP instruments; (2) how do institutional statements generate exposure to learning, compliance, and psychological costs; and (3) what do these patterns imply for the design of innovation competitions in administrative systems with unequal organizational capacity?

The study makes three contributions. Theoretically, it extends administrative burden analysis from citizen-state encounters to an intra-governmental setting in which public organizations become targets of centrally designed procedural demands. Methodologically, it links a strict Institutional Grammar coding layer to a separate burden-exposure layer, thereby avoiding the conflation of syntactic rule classification with the substantive onerousness of a procedure. Substantively, it shows how an innovation competition can remain lightly sanctioned in formal grammar while still becoming administratively demanding through accumulated conditions, evidence production, and system-mediated screening.

THEORETICAL FRAMEWORK

1.1 Institutional Grammar and the architecture of policy statements.

Institutional Grammar originates in Crawford and Ostrom's effort to specify the internal structure of institutional statements. In its classic form, the grammar distinguishes Attributes (A), Deontic (D), Aim (I), Conditions (C), and Or Else (O). These components permit researchers to distinguish shared strategies, norms, and rules according to the presence of prescriptive force and an explicit consequence (Crawford & Ostrom, 1995). Subsequent applications refined the method for policy design and regulatory research, demonstrating that the grammar can reveal differences in target populations, behavioral expectations, conditions, and sanctioning arrangements that remain difficult to see in document-level summaries (Siddiki et al., 2011, 2012).

The method has since developed into a more explicit coding architecture. Institutional Grammar 2.0 clarifies how nested statements, constitutive elements, objects, and component-level relations can be encoded, while recent reviews emphasize reproducibility, transparent unitization, and close attention to the meaning of modal verbs in context (Dunlop et al., 2019; Frantz & Siddiki, 2021, 2022). These refinements are important for Indonesian administrative documents because provisions are frequently organized as parent clauses followed by numbered or lettered subclauses. A modal or task assignment can govern several subordinate actions; conversely, the Indonesian word dapat can indicate permission, capability, or possibility depending on context. Mechanical word matching therefore produces unreliable Deontic coding.

This study follows a conservative approach. A statement is classified as a Rule only when an explicit consequence is textually connected to failure to comply. Selection outcomes are not automatically coded as Or Else. For example, a provision stating that proposal assessment occurs only after administrative screening

describes a sequence of stages. It becomes an Or Else only when the text states that failure to satisfy a requirement produces exclusion, disqualification, cancellation, or another specified consequence. This distinction preserves the analytical value of Institutional Grammar and separates formal rule structure from the broader burden that a process may impose.

1.2 Administrative burden beyond citizen-state encounters

Administrative burden refers to the costs that people experience when interacting with government. The standard framework distinguishes learning costs, which arise from finding and understanding relevant information; compliance costs, which arise from fulfilling procedural demands; and psychological costs, which include stress, loss of autonomy, stigma, frustration, or other mental costs associated with the interaction (Moynihan et al., 2015; Herd & Moynihan, 2018). This framework directs attention away from formal eligibility alone and toward the practical work required to obtain access, maintain status, or avoid negative administrative outcomes.

A large body of subsequent research has shown that burdens are distributive rather than uniform. Cognitive resources affect the ability to navigate demanding procedures, and administrative literacy can reduce psychological costs by increasing a person's capacity to understand and manage bureaucratic requirements (Christensen et al., 2020; Döring & Madsen, 2022). Organizational procedures can also produce exclusion even when formal eligibility remains unchanged, because confusing or cumbersome processes alter who completes them successfully (Brodkin & Majmundar, 2010). Recent reviews therefore treat burden as a field that intersects with red tape, implementation, digital administration, and institutional design rather than as a narrow characteristic of welfare programs (Madsen et al., 2022; Campbell et al., 2023; Halling & Baekgaard, 2024).

The KIPP case extends this reasoning to organizations. A participating service unit does not experience burden in the same way as an individual claimant, but its staff must allocate attention, time, documentation, and organizational coordination to satisfy centrally specified conditions. The burden may be borne by an administrator, a proposal team, an innovation unit, or a supervising official, while the formal participant is the public organization. This distinction matters because organizational resources can absorb individual effort. A large ministry or well-staffed local government may treat proposal preparation as routine, whereas a smaller service unit may face the same requirement as a substantial diversion of scarce administrative capacity.

Digital systems do not remove these costs automatically. Technology can reduce transaction costs, but it can also shift compliance work onto users through required data structures, upload standards, authentication, validation, and automated deadlines. Bozeman and Youtie (2020) describe a related burden-shifting dynamic in research administration, and Nisar and Masood (2024) show that material and virtual artifacts affect the accessibility of bureaucratic encounters. In KIPP, SINOVIK is therefore treated neither as inherently burdensome nor inherently simplifying. Its burden implications depend on the requirements that the system operationalizes.

1.3 Linking regulatory grammar to burden exposure.

Institutional Grammar and administrative burden answer different questions. Institutional Grammar identifies how an institutional statement is constructed. Administrative burden explains what kinds of costs the statement may require actors to bear. The two frameworks can therefore be linked without assuming a one-to-one correspondence between a grammatical component and a cost. A Deontic does not necessarily create high burden, and a shared strategy without an explicit Deontic may still impose extensive work when it defines a mandatory proposal workflow in practice.

We use the term institutionally generated administrative burden to describe burden exposure that can be traced to the design of institutional statements and their interaction. The concept refers to potential burden embedded in policy architecture, not to observed subjective experience. Conditions are especially important because they accumulate. A word limit may primarily generate learning and editing effort; a documentary requirement generates compliance work; a short deadline combined with disqualification risk may also create psychological-cost exposure. The analytical focus is therefore compositional. Burden may emerge from the interaction of Aim, Condition, and consequence even where the formal grammar contains few full ADICO rules.

This distinction also prevents overclaiming. Documentary analysis can identify requirements that plausibly expose actors to learning, compliance, or psychological costs, but it cannot demonstrate that a particular participant actually felt stress or spent a specific number of hours on compliance. Experienced burden is an empirical outcome that requires data from participants. The present study maps burden-producing features of the regulatory design and treats psychological burden as exposure to risk, uncertainty, loss, or constrained autonomy rather than as a measured mental state.

2. METHOD

2.1 Research design

The study uses structured qualitative-quantitative content analysis of formal policy documents. Content analysis is appropriate because the research questions concern observable textual features, their distribution, and

the interpretive relationship between regulatory syntax and administrative work (Krippendorff, 2018; Neuendorf, 2017). The design consists of two coding layers. Layer 1 applies Institutional Grammar to identify the structure of institutional statements. Layer 2 applies a predefined administrative burden codebook to identify potential learning, compliance, and psychological-cost exposure. The layers are recorded separately so that a statement's grammatical classification does not mechanically determine its burden classification.

The approach is deductive but not purely lexical. Candidate statements can be located using keywords and formatting cues, but final coding requires contextual reading of the clause, its parent provision, and, where necessary, the surrounding section. This is particularly important for nested lists and for verbs such as dapat, harus, wajib, bertugas, memastikan, and melengkapi, which have different institutional meanings depending on whether they indicate permission, obligation, assigned duty, or merely procedural description.

2.2 Corpus construction and document scope

The core corpus consists of national KIPP instruments issued by Kementerian PANRB between 2014 and 2025 that directly govern competition participation, proposal submission, administrative screening, evaluation, SINOVIK use, evidence, withdrawal, or related competition procedures. Supporting instruments on innovation development, replication, and monitoring were reviewed to understand the institutional environment but were excluded from the main quantitative denominator unless they directly regulated KIPP participation. Table 1 lists the core instruments used in the present draft.

Table 1. Core KIPP instruments included in the documentary corpus

Year	Instrument	Analytical role
2014	PermenPANRB No. 30/2014	General public service innovation guideline and One Agency One Innovation framework
2015	PermenPANRB No. 15/2015	KIPP 2016 framework, online proposal submission, and administrative selection
2016	PermenPANRB No. 19/2016	KIPP 2017 framework and expanded participant coverage
2018	PermenPANRB No. 3/2018	KIPP 2018 regulation, SINOVIK-based submission, and competition roles
2019	PermenPANRB No. 5/2019	Annual KIPP obligation and participant requirements
2020	KepmenPANRB No. 44/2020	Technical implementation guideline for KIPP 2020
2021	PermenPANRB No. 7/2021	Standing regulatory framework for KIPP
2021	KepmenPANRB No. 161/2021	Detailed KIPP 2021 implementation, proposal, evaluation, and SINOVIK procedures
2022	KepmenPANRB No. 50/2022	Technical implementation guideline for KIPP 2022
2023	Pedoman Menteri PANRB No. 3/2023	Detailed evaluation, proposal, threshold, and competition procedures
2025	Pedoman Menteri PANRB No. 4/2025	KIPP 2025 under budget-efficiency adjustments, objections, withdrawal, and dissemination

Document inclusion followed four rules. First, the instrument had to originate from the ministry responsible for KIPP. Second, it had to contain provisions directly governing KIPP or its annual implementation. Third, a document superseded within the same year was retained only for version comparison unless it remained the final operative version. Fourth, supporting innovation instruments were not merged into the KIPP denominator solely because they concerned public service innovation. These rules prevent inflation of the corpus by adjacent programs and preserve the competition as the unit of institutional analysis.

Source files were retained with year, instrument number, page, section, and extraction status. Digitally readable PDFs were extracted directly. Scanned instruments were transcribed or OCR-assisted and then checked against the rendered page before a statement was used in a quotation or a rule classification. This page-level traceability is essential because errors in OCR can change modal verbs, negations, numbers, and deadlines, which are analytically consequential in Institutional Grammar.

2.3 Unitization and statement segmentation

The unit of analysis is the institutional statement rather than the legal article, paragraph, or sentence as printed. A candidate unit must contain an actor, action, condition, prescription, consequence, or a combination of these elements relevant to KIPP governance. Long provisions are split when they contain separate actors, separate aims, or distinct consequences. By contrast, fragments are recombined when a parent clause supplies the actor or prescriptive force for child items. Unitization follows the principle that each row in the coding dataset should be interpretable as one institutional proposition (Siddiki et al., 2011; Frantz & Siddiki, 2022).

Recitals, legal citations, headings, purely definitional statements, scoring labels without actor-directed conduct, and incomplete list fragments are excluded from the analytical statement count. Definitions are retained only when they perform an operative function, for example by imposing a format or eligibility criterion. This distinction reduces the large residual category that would otherwise consist of policy context rather than governable conduct.

2.4 Institutional Grammar coding rules

Table 2 presents the operational codebook. The coding rules are deliberately conservative. Most importantly, Imperative or procedural verbs are not automatically converted into a Deontic. They are recorded as directive cues and classified as a strict Deontic only when the text expresses obligation, prohibition, permission, or an unambiguous assigned duty. Likewise, Or Else is limited to an explicit consequence linked to compliance or noncompliance.

Table 2. Operational coding rules for Institutional Grammar and burden exposure

Code	Operational meaning	Decision rule	Analytical use
Attribute (A)	Actor performing or targeted by the action	Use explicit actor. Inherit from a parent clause only when the grammatical relationship is unambiguous.	Identifies who bears or administers the requirement.
Deontic (D)	Prescriptive force	must = wajib/harus/berkewajiban or unambiguous assigned duty; must not = prohibition; may = permission/discretion. Do not code capability as permission.	Signals formal obligation, prohibition, or discretion but does not by itself determine burden.
Aim (I)	Action or intended result	Retain close to source wording; separate multiple aims when independently actionable.	Identifies the administrative work or decision.
Condition (C)	Temporal, procedural, spatial, threshold, format, system, or prerequisite condition	Code explicit conditions; inherited context only when required to interpret the unit.	May create learning and/or compliance exposure.
Or Else (O)	Explicit consequence attached to noncompliance	Code only when the consequence is textually linked to failure, breach, withdrawal, falsity, lateness, or another trigger.	May create loss or risk exposure. Not every unfavorable selection outcome is Or Else.
Shared strategy	A + I + C without strict D or O	Procedural statement with no prescriptive modal and no explicit consequence.	Can still be burdensome if it defines a required workflow in practice.
Norm	A + D + I + C without O	Prescription without an explicit competition-specific consequence.	Often corresponds to compliance work, but mapping is empirical rather than automatic.
Rule	A + D + I + C + O	Prescription with explicit linked consequence.	Highest formal sanction density; burden depends on substantive requirement and consequence.
Learning exposure	Information acquisition or interpretation work	Categories, definitions, eligibility logic, scoring instruments, thresholds, changing formats, system instructions.	Multi-label burden code.
Compliance exposure	Action, documentation, time, or coordination required to satisfy a procedure	Proposal writing, upload, evidence, letters, video, data, signatures, correction, attendance.	Multi-label burden code.
Psychological-cost exposure	Textually identifiable risk of loss, forced continuation, short correction window, disqualification, or uncertainty with material consequence	Code exposure only. Do not infer experienced stress from documents.	Multi-label burden code requiring explicit textual basis.

2.5 Administrative burden coding

Burden coding is multi-label. A statement can create more than one type of exposure because the same provision may require both interpretation and action, or action under threat of exclusion. Learning exposure is coded when a participant must identify, understand, compare, or interpret information beyond the substantive description of the innovation. Typical indicators include group classification, proposal format, assessment criteria, scoring thresholds, word limits, or system-specific instructions. Compliance exposure is coded when the provision requires production, transmission, verification, attendance, correction, or maintenance of information or documents. Typical examples include uploading supporting evidence, producing before-and-after data, obtaining signatures, creating videos, submitting withdrawal letters, or responding within a prescribed period.

Psychological-cost exposure is treated more cautiously. The code is assigned only when the text creates a plausible loss or constrained-choice mechanism, such as disqualification, cancellation of status, exclusion from evaluation, inability to withdraw without consequence, or a tightly bounded objection period. General uncertainty about competition results is not coded as psychological exposure because such uncertainty is inherent to competitive evaluation and is not necessarily an administrative burden. This restriction aligns the documentary design with the conceptual requirement that psychological costs concern experienced or plausibly induced mental burdens rather than any unfavorable policy outcome (Moynihan et al., 2015; Döring & Madsen, 2022).

Because the three burden dimensions can co-occur, two forms of reporting are used. First, unique combination categories show mutually exclusive patterns such as Learning only or Learning + Compliance. Second, marginal totals report the number of statements containing each burden dimension regardless of co-

occurrence. The marginal totals are therefore larger than the count of unique burden-bearing statements and should not be added together.

2.6 Coding workflow and audit trail

The statement-level coding was conducted by one primary coder using the predefined decision rules presented in Table 2. The workflow proceeded in eight steps. First, a document inventory was created recording the title, year, legal status, and final-version status of each instrument. Second, source texts were extracted or transcribed while preserving page references. Third, non-operative material was removed according to the exclusion criteria. Fourth, candidate institutional statements were segmented and assigned permanent statement identifiers. Fifth, Attribute (A), Deontic (D), Aim (I), Condition (C), and Or Else (O) components were coded. Sixth, the resulting configuration was classified as a shared strategy, norm, or rule. Seventh, learning-, compliance-, and psychological-cost exposure was coded separately using the burden codebook. Finally, statement-level quality assurance was completed before aggregation.

Because statement-level coding was undertaken by one primary coder, intercoder agreement coefficients such as Krippendorff's alpha or Cohen's kappa were not calculated. These measures require independent coding judgments and therefore would not provide a meaningful reliability estimate for the present design (Hayes & Krippendorff, 2007). Instead, coding consistency was strengthened through a structured audit trail and targeted rechecking of analytically consequential cases. Particular attention was given to inherited actors and conditions, ambiguous Deontic cues, candidate Or Else clauses, statements assigned to full ADICO rules, and provisions receiving multiple administrative-burden codes. These cases were rechecked against the original source provision and its surrounding textual context before aggregation. The working dataset retained the document identifier, year, page, source statement, statement identifier, A/D/I/C/O fields, statement type, burden indicators, coding confidence, extraction method, and quality-assurance notes, allowing each analytical classification to be traced to its documentary basis.

2.7 Analytical strategy

The quantitative analysis is descriptive. Frequencies and percentages are calculated for year, prescriptive cue, statement type, Condition presence, Or Else candidates, and burden combinations. The purpose is to describe the institutional architecture rather than estimate causal effects. Percentages use the 1,023 candidate statements as the denominator unless otherwise specified. Marginal burden totals are reported separately because burden dimensions are not mutually exclusive.

The qualitative analysis uses exemplar statements selected for analytical diversity rather than representativeness. Exemplar selection covers explicit obligation, online submission, format rules, administrative screening, disqualification, documentary evidence, objections, and withdrawal. Each exemplar is traced to the relevant source document and interpreted using the same codebook as the quantitative analysis. This combination allows the article to show both the distribution of coded features and the textual mechanism through which burden is produced.

3. RESULT AND DISCUSSION

3.1 Corpus profile and density of administrative conditions

The segmentation produced 1,023 candidate institutional statements across the core KIPP instruments. Table 3 shows the distribution by document year. The 2025 guideline accounts for the largest share of candidate statements, reflecting its detailed treatment of participation, submission, screening, objections, withdrawal, dissemination, and data use. Earlier instruments are shorter and devote more text to establishing the competition architecture. The distribution should not be read as a direct measure of regulatory strictness because document length and unitization affect statement counts.

Table 3. Candidate institutional statements by document year

Document year	Candidate statements	Percent
2014	43	4.2
2015	80	7.8
2016	65	6.4
2018	76	7.4
2019	61	6.0
2020	43	4.2
2021	104	10.2
2022	107	10.5
2023	123	12.0
2025	321	31.4

Total	1,023	100.0

Conditions are the most pervasive structural feature in the coding: 616 candidate statements contain at least one temporal, procedural, evidentiary, format, system, threshold, or prerequisite condition. The substantive importance of this result is not that every Condition is burdensome. Rather, conditions are the points at which a general innovation requirement becomes operational. They specify when a proposal can be submitted, how it must be formatted, what evidence is acceptable, which system must be used, and what thresholds determine movement between stages.

This pattern is visible in the annual guidelines. The 2021 proposal instrument combines word limits with requirements to describe evaluation methods and outcomes, while the 2023 guideline repeatedly asks participants to attach relevant evidence within specified word limits. In 2025, administrative selection checks the number of innovations, the completeness and accessibility of supporting evidence, and duplication before a proposal can proceed to substantive assessment (Kementerian PANRB, 2021b, 2023, 2025). These are not merely narrative preferences. They structure the interface between participating organizations and the competition.

3.2 Prescriptive cues and formal statement types

The coding identified several kinds of prescriptive cues (Table 4). The categories in this table are screening categories rather than final strict Deontic values. The distinction is important: procedural directives such as 'ensure', 'submit', or 'complete' may signal an institutional requirement but should only be converted to a strict Deontic after contextual verification.

Table 4. Distribution of prescriptive cues

Coding category	Frequency	Percent
Implicit or no explicit modal	453	44.3
Administrative directive / inherited task cue	311	30.4
May / explicit permission or discretion cue	164	16.0
Must / wajib / harus cue	81	7.9
Must not / prohibition cue	14	1.4
Total	1,023	100.0

The statement classification shows a strong concentration in shared strategies and norms. Of the 1,023 candidate statements, 617 were coded as shared strategies, 403 as norms, and only three as full rules under the strict ADICO structure (Table 5). Nineteen candidate consequence markers were identified during the initial screening of the corpus. Subsequent contextual examination showed that most did not satisfy the stricter requirement that an Or Else be explicitly and grammatically connected to noncompliance. The difference between candidate consequence markers and full ADICO rules is therefore substantive rather than procedural: unfavorable outcomes were not treated as sanctions unless the regulatory text explicitly connected them to failure to comply.

A low rule count does not mean the competition is administratively light. It means that KIPP often governs through procedures, assigned tasks, eligibility conditions, and staged screening rather than through frequent sanction clauses. This pattern is consistent with the broader Institutional Grammar literature, which treats sanction density as only one dimension of institutional design (Siddiki et al., 2011, 2012; Dunlop et al., 2019).

Table 5. Institutional Grammar classification

Statement type	Frequency	Percent
Shared strategy	617	60.3
Norm	403	39.4
Rule	3	0.3
Total	1,023	100.0

3.3 Distribution of administrative burden exposure

Table 6 reports mutually exclusive burden combinations from the final statement-level coding. Learning only is the largest single burden category, followed by compliance only and joint learning-compliance exposure. When co-occurring categories are collapsed into marginal totals, 235 statements contain learning exposure and 182 contain compliance exposure. Psychological-cost exposure is present in 40 statements, not 25, because it appears both alone and in combination with the other burden dimensions.

Table 6. Administrative burden combinations

Burden combination	Frequency	Percent
Learning only	168	16.4
Compliance only	120	11.7

Learning + Compliance	57	5.6
Psychological only	29	2.8
Learning + Psychological	6	0.6
Compliance + Psychological	1	0.1
Learning + Compliance + Psychological	4	0.4
Indirect / no direct burden exposure coded	638	62.4
Total	1,023	100.0

The burden profile is concentrated in proposal translation. Learning exposure occurs when participants must understand categories, scoring logic, eligibility conditions, system instructions, word limits, and evidentiary expectations. Compliance exposure occurs when participants must convert that understanding into documents, data, links, videos, signatures, letters, and system entries. The two dimensions therefore interact. A requirement to attach an evaluation report within a fixed narrative structure is not simply an extra document; participants must first determine what evidence satisfies the criterion and then produce it in the required form.

Psychological-cost exposure is less common in the text, but its location is consequential. It clusters around disqualification, exclusion from evaluation, withdrawal rules, cancellation, and short corrective windows. Because the study analyzes documents rather than participant experiences, this result is best understood as a map of risk-bearing clauses. Whether those clauses produce stress, frustration, or perceived loss of autonomy is a question for subsequent interviews or surveys.

3.4 Granular Institutional Grammar exemplars

Table 7 illustrates how the coding rules operate on concrete KIPP provisions. The examples are selected to represent distinct burden mechanisms. Direct quotations are kept short and are linked to the operative feature being coded.

Table 7. Granular coding exemplars from KIPP instruments

No.	Source provision	IG coding	Type	Burden	Interpretation
1	"Setiap ... wajib mengikutsertakan paling sedikit 1 (satu) Inovasi ..." (2019)	A: K/L, local governments, SOEs, ROEs; D: must; I: enter innovation; C: at least one innovation; O: none	Norm	Compliance	Annual participation becomes a formal organizational obligation.
2	Proposal submitted online through the innovation information system and accompanied by relevant supporting documents (2019)	A: participant; D: must; I: submit proposal and evidence; C: online system; O: none	Norm	Learning + Compliance	Participants must understand the platform and produce evidence in an acceptable digital form.
3	"Proposal Inovasi ... sesuai dengan format yang ditetapkan" (2021)	A: participant, inherited; D: none/implicit; I: prepare proposal; C: organizer-defined format; O: none	Shared strategy	Learning	The competition standardizes how an innovation must be translated before evaluation.
4	Administrative selection is conducted on all proposals submitted in SINOVIK (2021)	A: Secretariat; D: assigned task; I: screen proposals; C: all SINOVIK submissions; O: none	Norm (assigned duty)	Compliance exposure for participant	Screening creates a procedural gateway, but screening itself is not coded as a sanction.
5	"Pengajuan yang tidak memenuhi ... hingga akhir tenggat waktu akan didiskualifikasi" (2015)	A: applicant; D: requirement inherited; I: satisfy five prerequisites; C: by deadline; O: disqualification and exclusion from evaluation	Rule	Compliance + Psychological	Administrative incompleteness is explicitly connected to formal elimination.
6	"Lengkapi ... data dukung ... Maksimal 600 kata" (2023)	A: participant; D: directive cue; I: provide impact explanation and evidence; C: before-after evidence and 600-word limit; O: none	Shared strategy	Learning + Compliance	Evidence production and compression occur simultaneously.
7	Participants may object to administrative-selection results through SINOVIK with reasons and supporting evidence (2025)	A: participant; D: may; I: lodge objection; C: SINOVIK, defined period, supporting evidence; O: none	Norm (permission)	Learning + Compliance + Psychological	A curative route exists, but using it requires procedural knowledge, evidence, and timeliness.
8	Late withdrawal means the participant remains in KIPP and must complete all remaining assessment stages (2025)	A: participant; D: must; I: continue participation; C: withdrawal letter submitted after deadline; O: deemed to remain participating	Rule candidate	Compliance + Psychological	A missed administrative window constrains exit and extends required participation.

The 2015 instrument provides the clearest example of an explicit Or Else. It first identifies five administrative prerequisites and provides system notification for correction. It then states that submissions still failing to satisfy the prerequisites by the deadline will be disqualified and excluded from evaluation (Kementerian PANRB, 2015). The consequence is directly linked to noncompliance, so the provision qualifies as a rule under strict Institutional Grammar.

The 2023 proposal form shows a different mechanism. Participants are asked to explain impact, describe the evaluation method, and attach internal or external evidence containing before-and-after data, all within a 600-word maximum (Kementerian PANRB, 2023). No explicit sanction appears in the clause itself. Nevertheless, it creates learning exposure because participants must understand what counts as credible impact evidence, and compliance exposure because they must produce and attach that evidence within a compressed narrative format.

The 2025 guideline introduces a more explicit curative step. Participants may object to administrative-selection results through SINOVIK during a period set by the Secretariat and must provide reasons and supporting

evidence; the Secretariat then rechecks the decision (Kementerian PANRB, 2025). This reduces the finality of first-stage screening. It does not eliminate burden, however, because successful use of the remedy still depends on procedural knowledge, system access, evidence, and timing.

3.5 From innovation practice to documentable innovation

Across the instruments, the substantive pattern is a gradual elaboration of the documentary interface. KIPP evaluates service innovation, but it necessarily evaluates innovation through representations of practice. Proposal fields, data, supporting documents, evaluation reports, replication evidence, and system records are proxies through which a dispersed panel can judge initiatives implemented in different sectors and regions. The competition therefore rewards more than the existence of an innovative practice. It requires the practice to be made legible in an administratively standardized form.

Comparable evidence is necessary for fairness and accountability, and structured applications make otherwise diverse innovations assessable within a common decision process. The issue is proportionality. As conditions accumulate, documentary competence becomes increasingly entangled with substantive innovation quality. The regulations do not state that organizations with better proposal-writing capability should be advantaged, yet the architecture can produce that effect if evidence and format requirements exceed what less-resourced participants can readily supply.

3.6 Compliance architecture without sanction saturation

The first finding is that KIPP can be administratively demanding without being sanction-saturated. Full ADICO rules are rare in the coded corpus, but compliance work is recurrent. This distinction is important because administrative burden and red tape are often discussed as if burdens originate primarily in restrictive rules. In KIPP, much of the work is produced by procedural architecture: proposal preparation, evidence assembly, system submission, verification, and staged screening. Bozeman and Youtie (2020) describe a similar burden shift when administrative technologies transfer compliance activity to professional users, while Campbell et al. (2023) show that administrative burden and red tape literatures privilege different actors and mechanisms even when they examine onerous rules.

The KIPP case therefore suggests that sanction density is a poor proxy for burden intensity. A competition can contain few explicit penalties yet still require substantial organizational labor. The analytical implication is to separate institutional hardness from administrative workload. Institutional Grammar is useful for the first question because it identifies whether obligations and consequences are encoded in the rule structure. Administrative burden is useful for the second because it directs attention to the work required to navigate the process. Combining the two prevents the false conclusion that a predominance of shared strategies implies a light-touch administrative regime.

3.7 Stacked conditionality as a learning problem

The second finding concerns stacked conditionality. KIPP conditions specify categories, eligibility, format, word limits, implementation age, evaluation evidence, replication status, data accessibility, system procedures, deadlines, and stage-specific requirements. Any single condition may be modest. The learning problem arises because participants must construct a coherent mental model of how the conditions interact before they can comply efficiently. This finding aligns with administrative burden research showing that cognitive resources and administrative literacy shape the ability to navigate public programs (Christensen et al., 2020; Döring & Madsen, 2022).

For public organizations, the relevant resource is not only individual literacy. It includes organizational memory, prior competition experience, evaluation routines, data management, legal-administrative support, and the ability to coordinate across units. Public sector innovation research already shows that innovation capacity varies with organizational conditions, leadership, experimentation, and networks (de Vries et al., 2016; Demircioglu & Audretsch, 2017; Lewis et al., 2018). The present findings add a documentary dimension to that literature. The capacity to innovate and the capacity to document innovation are analytically distinct, but the competition can make them operationally interdependent.

This matters in Indonesia because KIPP participation spans organizations with different administrative resources. Prior research on the competition reports uneven innovation capacity and repeated concentration of recognized innovations among some organizations or regions (Pratama, 2020; Muluk & Pratama, 2021). The documentary analysis cannot establish that lower-capacity organizations are systematically excluded, but it identifies a plausible mechanism through which capacity differences can enter the selection process before substantive evaluation is complete.

3.8 Curative process, procedural loss, and psychological-cost exposure

The third finding concerns the relationship between formal consequences and curative process. The 2015 instrument explicitly allows system notification to complete or improve proposals before the deadline, but unresolved failure is connected to disqualification. Later instruments contain additional consequences related to data veracity, withdrawal, and status. The 2025 guideline is notable because it permits objections to administrative-selection results and requires re-examination by the Secretariat (Kementerian PANRB, 2015, 2025). This creates a formal opportunity to correct or contest an administrative decision.

From an administrative burden perspective, curative process is important because it changes the cost of error. A system in which a minor documentary mistake causes irreversible exclusion places a different burden on participants than one in which an error can be corrected or reviewed. Brodkin and Majmundar (2010) show how organizational procedures can generate administrative exclusion even where substantive entitlement does not change. KIPP is not a benefit program, but the mechanism is comparable: a procedural gateway determines whether an otherwise eligible case reaches substantive consideration.

The documentary evidence nevertheless supports only psychological-cost exposure, not experienced psychological cost. Disqualification risk, constrained withdrawal, short objection windows, or uncertainty about document accessibility may plausibly produce stress for staff responsible for an institutional submission, but that proposition requires direct evidence from participants. This boundary is consistent with recent administrative burden reviews that distinguish state-created requirements, perceived burden, and downstream outcomes (Halling & Baekgaard, 2024).

3.9 Innovation governance as governance of evidence

The broader contribution is to innovation governance. Innovation policy often emphasizes experimentation, learning, diffusion, and collaboration (Hartley et al., 2013; Cinar et al., 2019). Competitions add another layer: they govern evidence about innovation. The central government must decide which claims are comparable, which documents are credible, which indicators demonstrate impact, and how much narrative space is sufficient. These decisions are not merely technical. They define the documentary form through which innovation becomes recognizable at the national level.

In KIPP, this governance of evidence is visible in the increasing specificity of evaluation criteria and supporting documentation. Such standardization can improve fairness, reduce discretionary ambiguity, and facilitate peer review. Yet it can also favor organizations that already possess evaluation data, writing capacity, digital infrastructure, and experienced administrators. The theoretical point is therefore not that standardization is undesirable. It is that standardization redistributes work. A well-designed competition should ask whether each unit of documentary work materially improves validity, comparability, integrity, or learning.

This argument complements Indonesian innovation research rather than replacing it. Studies have identified organizational determinants of successful innovation and documented KIPP's contribution to mapping and disseminating public service practices (Kusumasari et al., 2019; Pratama, 2020). More recent evidence also links local public sector innovation to development outcomes (Hilmawan et al., 2023). The present study examines an earlier point in the chain: the institutional interface through which innovations enter, survive, and become visible in the national competition.

3.10 Implications for regulatory design

The findings support a burden-sensitive design approach rather than blanket deregulation. Some requirements are necessary to protect integrity and permit comparison. The design problem is to distinguish essential verification from avoidable documentary work. Table 8 translates the analysis into concrete design options.

Table 8. Burden-sensitive design options for KIPP

Design option	Operational change	Expected burden effect
Requirement hierarchy	Distinguish mandatory eligibility evidence, evaluation evidence, and optional enrichment material in the guideline and SINOVIK.	Reduces learning cost and accidental noncompliance.
Stable core format	Keep core proposal fields and word-limit logic stable across competition cycles unless a change is substantively necessary.	Reduces repeated learning and conversion work.
Progressive evidence	Require basic proof at entry, then request higher-cost evidence only from proposals that advance.	Moves compliance work closer to the stage where it adds decision value.
Curative administrative review	Provide pre-exclusion validation, clear error messages, and a defined correction or objection route for remediable defects.	Reduces irreversible loss from low-substance administrative mistakes.
Machine-readable guidance	Embed examples, field-level definitions, validation rules, and deadline warnings inside SINOVIK.	Shifts learning from external interpretation to in-system support.
Burden audit	Before each cycle, document every new field or attachment and justify its decision value, expected preparation effort, and affected actor.	Makes administrative workload an explicit policy-design criterion.
Capacity-sensitive support	Provide standardized templates, evidence examples, and targeted technical assistance for first-time or lower-capacity participants.	Reduces the extent to which documentary capacity substitutes for innovation quality.

These recommendations are consistent with the core principle of burden reduction: remove or redesign frictions that do not add commensurate public value, while retaining procedures that protect program integrity (Herd & Moynihan, 2018; Madsen et al., 2022). In KIPP, the relevant objective is not minimum paperwork at any cost. It is proportional paperwork: enough evidence to support credible selection without converting proposal administration into a separate capability test.

5. CONCLUSION

This study examines KIPP as an institutional interface rather than only as an innovation award. The coded corpus of 1,023 institutional statements shows a competition governed primarily through procedures, conditions, and norms rather than dense sanction-backed rules. Conditions are widespread, and burden mapping identifies learning exposure in 235 statements, compliance exposure in 182, and psychological-cost exposure in 40. The central mechanism is cumulative. Participants must repeatedly translate substantive innovation into categories, narratives, evidence, and system-compatible records before the innovation can be evaluated on its merits.

The integration of Institutional Grammar and administrative burden clarifies two issues that are easily conflated. First, formal rule structure concerns whether an institutional statement contains a prescription and an explicit consequence. Second, burden concerns the amount and type of work or risk created by the broader procedural design. A statement can be a shared strategy in grammatical terms and still contribute materially to learning or compliance burden. Conversely, an explicit rule can be narrow and justified. The empirical task is therefore to identify both architecture and cost-generating mechanism.

For Kementerian PANRB, the policy implication is to treat participant burden as a design variable. Core evidence requirements should be separated from optional material, proposal structures should remain stable where possible, high-cost evidence can be staged, and curative review should protect substantively viable innovations from remediable administrative errors. SINOVIK can support this approach through field-level guidance, automated validation, and early warnings rather than functioning only as a submission gate.

The study has three limitations. First, documentary analysis identifies burden exposure but does not measure experienced burden, including preparation time, perceived difficulty, stress, or organizational opportunity costs. Second, statement-level coding was conducted by one primary coder. Although analytically consequential and ambiguous classifications were rechecked against the original regulatory text through a structured audit procedure, the study does not provide an independent intercoder reliability coefficient. Future research could strengthen this aspect by independently coding a stratified subset of statements before adjudication. Third, the study examines national KIPP instruments and therefore cannot determine whether ministries, agencies, or local governments introduce additional preparatory procedures before formal submission. Future research could combine the statement-level dataset with interviews or surveys of participating administrators and examine whether particular regulatory features are associated with preparation time, correction frequency, or administrative exclusion. In conclusion, innovation competitions should be assessed not only by the innovations they select but also by the administrative grammar through which those innovations are made visible.

6. CONFLICT OF INTEREST STATEMENT

Authors state no conflict of interest.

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