DEGREES_OF_APPROPRIATENESS,_FAIRNESS,_AND_RATIONALITY_IN_THE_AMOUNT_OF_HOUSING

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DEGREES OF APPROPRIATENESS, FAIRNESS, AND RATIONALITY IN THE AMOUNT OF HOUSING ALLOWANCE FOR MEMBERS OF REGIONAL HOUSE OF REPRESENTATIVE IN MESUJI DISTRICT OF LAMPUNG PROVINCE

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ABSTRACT: since the issuance of Government Regulation Number 18 in 2017, members of Regional House of Representative in Indonesia receive additional allowance for welfare in forms of housing and transportation allowances. The provision for the amount of these allowance values are normatively limited by principles of appropriateness, fairness, rationality, and conformity with local price standards. There have been phenomena that members of Regional House of Representative of a region make the value amount received by members of Regional House of Representative in other regions as a standard for the same amount they must receive. Factually, a regional finance ability and conditions of a region are clearly different with other regions. Theoretically, there are some approaches to determine the allowance amount and these in turn also imply different allowance amount values. The questions in this research were how did the alternatives of models to estimate housing and transportation allowance amounts for members of Regional House of Representative? How much would the allowance amounts for each alternative? By comparing approaches, this research provided the most suitable alternative options with principles of appropriateness, fairness, and rationality for public ethic upon the amounts for housing and transportation allowances for members of Regional House of Representative in Mesuji district in Lampung province. This paper shall answer the question concerning which approach that had been most accountable.

Keywords: *accountability degree, housing allowance, Regional House of Representative*

1. INTRODUCTION

The Law Number 23 in 2014 concerning Regional Government (as it was amended for the second time by the Law Number 9 in 2015) clearly states that the regional government administration can be performed together between the Regional House of Representative and The Regional Head. Both of them have the same position as elements for regional government administrators who are given mandate by the people to perform government affairs for the region. Therefore, the Regional House of Representative as a regional government institution has an equal and parallel position with, and has work relationship in partnership form with the Regional Head. Equal means that the Regional House of Representative and Regional

Government have the same position, while parallel means that neither between them becoming sub-ordinate of another. Partnership means that the Regional House of Representative is the working partner of Regional Government in making regional policies in order to regional autonomy implementation according to their respective job descriptions.

As one of regional government administrator elements, the Regional House of Representative is required to be able to carry on democratic values and to struggle public mandates and aspirations optimally in the region. The indicators of success of the Regional House of Representative in performing public mandates and aspirations are not separated from the human resource quality, integrity, and credibility owned by members of Regional House of Representative. To support these, coordination between the Regional House of Representative and Regional Head is required to build harmonious and good relationship, by not dominating each other. The institutional cooperation improvement is performed with a balance between managing political dynamics in one side and keeping regional government stability in another side, so that this balanced pattern in regional government management shall provide benefits significantly for the public welfare improvement in the region.

In order this balanced pattern in managing regional government to run smoothly, each party needs to be supported with sufficient welfare. Therefore, a regulation concerning the financial and administrative rights of members of the Regional House of Representative is required. The objectives of regulation of the financial and administrative rights of members of the Regional House of Representative are: (a) to improve the roles and responsibilities of the Regional House of Representative in order to develop democracy life; (b) to ensure public and regional representativeness in performing the functions, tasks, and authorities of the institution; (c) in order to improve balance mechanism between the Regional House of Representative and Regional Government; and (d) to improve quality, productivity, and performance of the Regional House of Representative in order to encourage the roles of the Regional House of Representative to realize public justice and welfare.

In the context to fulfill those objectives, as well as part of implementation of provisions in Article 124 paragraph (2), Article 178 paragraph (2), and Article 299 paragraph (2) of the Law number 23 in 2014 concerning the Regional Government, the government enacted the Government Regulation (PP) number 18 in 2017 concerning Financial and Administrative Rights of Leaders and Members of Regional House of Representative. This Government Regulation number 18 in 2017 substituted Government Regulation number 24 in 2004 concerning the Protocol and Financial Positions of Leaders and Members of Regional House of Representative.

Based on the regulations in Article 9, 10, 11, and 12 in the Regional Government number 18 in 2017, the welfare allowances for Leaders and Members of Regional House of Representative contain of: (a) health insurance (granted in form of BPJS routine premium); (b) work accident insurance (granted according to amount of work accident insurance premium); (c) life insurance (granted according to amount of life insurance premium); and (d) official clothing and attributes (granted in forms of civil servant and daily official clothing and traditional clothing). Other than these 4 (four) welfare allowances, the Leaders of Regional House of Representative are also provided with welfare allowances in forms of official housing and its utilities, official vehicles, and expenses for households. For members of Regional House of Representative, other than 3 (three) main welfare allowances, they can be provided with welfare allowances in forms of official housing and its utilities, and transportation allowance.

The Mesuji district as a new autonomous region of course does not have optimal ability in providing those varying welfare facilities, especially in providing official housing and official vehicles. Therefore, the most rational option is to provide allowances for housing and transportation in cash. In the context of accountability and efficiency, determination of the amounts for housing and transportation allowances must be done by considering some aspects, such as cost appropriateness to expense, balance with other districts around Mesuji district, compatibility with the the regional income level (regional financial ability), and to obtain a balanced "satisfaction level" between the Regional House of Representative as the people receiving allowances and people of Mesuji district.

Based on those backgrounds, the problem statements in research were: (1) how did alternatives in estimating the determination for housing allowance amount for members of Regional House of Representative in Mesuji district; (2) how much the housing allowance amounts for Leaders and Members of Regional House of Representative in Mesuji district that were compatible with the standard for official housing?; and (3) based on some estimation alternatives, which approach should be most satisfying the accountability level concerning the principles of appropriateness, fairness, rationality, and conformity with local price standards?

Actually, concerning methods for determining housing allowance amount – even though not many – there have been some similar researches in other regions, for example, a research done by Ernawati (2015) in Kotabaru district of South Kalimantan. However, the norm approach as the base for housing allowance amount in Kotabaru used a single approach that was the Regulation of Minister of Finance number 96/PMK.06/2007 concerning the Procedures for Implementation, Utilization, Writing Off, and Transfer of Properties Owned by State.

In the researcher's perspective, the use of Regulation of Minister of Finance number 96/PMK.06/2007 in Kotabaru was not proper because this Regulation of Minister actually did not regulate the amount for rent cost upon a house or a building owned by state by public/institutions outside state. It meant that this Regulation of Minister of Finance regulated amount of rental cost that should be received by state from the state's properties leased to public. Meanwhile, in the context of Government regulation number 18 in 2017, oppositely, the amount of allowance value was the sum of cash that the state should expense based on the amount of rental cost of a house owned by public in an area that had a proper social and economy values for a member of Regional House of Representative in a region.

In that perspective, this research was relevant to do because it provided alternatives for more proper and varying approaches in order to determine the amount for housing allowance for members of Regional House of Representative. These approach alternatives would imply degree of accountability. In this case, the amount for housing allowance in this research was intended for members of Regional House of Representative in Mesuji district. However in the side of method use or estimation approach, some approach alternatives in this research were used in all regions in Indonesia, both for provincial Regional House of Representative and district/municipal Regional House of Representative.

2. LITERATURE REVIEW

A. The Meaning of Accountability in the Principles for Determination

Assessment in order to determine amounts for housing and transportation allowances for Leaders and Members of Regional House of Representative in Mesuji district that would be

granted on monthly base in cash cannot be performed carelessly. Determination for amounts of these two allowances (by using some method options) should consider four principles; the principle of appropriateness, fairness, rationality, and conformity with market price, as they were confirmed in the Article 17 of Government Regulation number 18 in 2017.

1. The principle of appropriateness means that the amount for housing allowance should be able to fulfill the needs of Leaders and Members of Regional House of Representative in obtaining proper housing (in terms of location and technical standards) in order to support performance of Regional House of Representative in Mesuji district in functions of overseeing, budgeting, and drafting legislations.
2. The principle of fairness means that the amount for housing allowance should not trigger public controversy because the amount being considered as unfair (too much or too small).
3. The principle of rationality means that the provided allowance amount should be making sense or rational.
4. The principle of conformity with local standards means that the amount for housing allowance should consider the amount for housing cost in the Mesuji district.

However, because some methods in determining the allowance amount implies the difference in cash value amount to provide, the accountability degree is proper to use. Accountability degree is a phrase or word formation from accountability and degree. Degree according to KBBI (2008: 116) has a meaning, amongst many, of level. Accountability is generally associated with responsibility process toward provided services or service that have been performed. Accountability refers to responsibility of someone to another party that has a right to request accountability. Sedarmayanti (2003:69) suggest that:

> "Accountability can be expressed as an obligation to provide responsibility or to answer and explain performance and action of someone or an organization to the party who has the right or authority to request explanation or accountability."

Article 3 of Law number 28 in 1999 concerning State Governance that is Clean and Free from Corruption, Collusion, and Nepotism suggest that accountability is one of parts in the general principles for state administration. The accountability principle in this Law means that in each final result of state administration should be accounted for to public as the highest sovereignty holder according to provisions of prevailing legislations and regulations. Accountability is a manifestation of improvement of governance order oriented to good governance concept, and therefore the importance of this accountability creates some perspectives that bring up some categories and types of accountabilities.

Karhi (1997: 65) differentiates accountability into three types: a) political accountability that is associated with political system and election system; b) financial accountability, that each government apparatus must account for each public cash in the expense budget coming from tax and retribution income; c) legal accountability, that people should have a faith, that government is legally responsible upon each of its action. In those perspectives of understanding and categories of accountabilities, the meaning of accountability degree in this research is that the level of Rupiah value received by members of Regional House of Representative for their housing allowances financially can be accounted for from the aspects of appropriateness, fairness, and rationality. The Government Regulation number 18 in 2017 does not provide amount limit for the housing allowance, therefore the accountability degree should be developed so that the amount for housing allowance can be accounted for legally, theoretically, and ethically.

B. The Mainstream in Determining Allowance Amount

According to Sudiono (2017: 6), there are 2 (two) mainstreams or approaches for determining the allowance amount; by using a) approximation survey (assumption on local price), or by using b) object assessment (a special object planned to lease or that has had a rental transaction). The first approach is performed based on samples of housing population has been surveyed, while the second approach is performed to real houses to lease or houses that have had rental transactions. The second approach is also referred to as object assessment or appraisal or valuation; a process to give written opinion upon economic value of an assessed object according to Indonesia Standard of Assessment (SPI).

SPI is a basic guidance that an assessor must adhere in doing assessment. The basic value that is suitable with the objective of assessment is the Market Rental Value. The market rental value is defined as approximation of cash value that can be obtained from renting an asset at the date of assessment, between the owner that intends to lease and the lessee that intends to lease according to proper rental requirements in an independent transaction, with proper marketing, where each party mutually recognizes, careful, and without any pressure (SPI 101, point 3.6: 2015).

C. Various Alternatives of Assessment Methods

Normatively, there are four approaches to use in estimating the amount of housing allowance; the social-economy approach, market approach, investment approach, and comparison approach. The firs approach is absolute because it is qualitative, while the second, third and fourth approach respectively produce quantitative values so that they shall be complementary options for the first approach.

1. The social-economy approach discusses factors owned by houses that are surveyed, to differentiate the rental prices/selling prices of houses that are surveyed. Social-economy analysis also discusses properness considerations of official houses that fulfill the principle of appropriateness in the aspects of building location and technical building construction.
2. The market approach produces value indicators by comparing assets to assess with other identic or comparable assets with their transaction price or offering price information. The first step in market approach is considering the prices that have just occurred in the transaction market toward identical or comparable assets. If there are few transactions, it can use offered prices (to lease) or listed prices from comparable or identical assets. If there is any difference with real transactions, it shall require adjustments for the transaction or offering price information. The differences may include legal, economy, or physical characteristics of the assets to be transacted and to be assessed (SPI. KPUP.17:2015).

The market rental value is obtained from analyses of transactions, offerings and demands of the typical properties located in the intended location by considering comparison factors such as: location, building condition, building physical characteristics (numbers of rooms and toilets, car garage, and building facilities), accessibility, environment, security, economy, and other factors that influence the assessment. The market rental value according to SPI is defined as an approximation of cash amount that is received from renting an asset at the date of assessment, between the owner who intends to lease and lessee who intends to lease according to proper rental requirements, and each party mutually recognizes, to act carefully, and without any pressure (SPI 101. Point 3.4: 2015).

To obtain the assessment number then appraisal or market approach is applied to assess the market rental value of the housing and vehicle because sufficient availability of market data concerning those property and vehicle.

3. The investment approach. The technical-financial analysis in the investment approach is by simulating the amount of housing allowance by estimating the cost for construction/investment of official housing/property. Then, the cost shall be divided with numbers of months of service period of members of Regional House of Representative (one period/5 years/60 months or two period/10 years/120 months). The simulation result can be used as a reference or alternative in determining the housing allowance amount to provide each month.

    The investment approach for house rental price refers to economy assessment to the building value, land price, and prevailing bank interest rate. The method simulates funding through estimation function of PMT financial property (payment), a formula to estimate the installment value periodically to pay off a loan value based on period, constant payment, and constant interest rate. PMT (payment) is used to determine the value amount for each installment payment with effective interest in a certain period.
    Using this method is done by assuming that rental price is the installment value like the investment installment in a certain period of time. The estimation in this method is used as basic for proper and making sense determination of house rental price, but this approach ignores the final value of projection period (120 months/10 years/2 periods); the remaining value of an asset or as it is referred to as *terminal value* or *salvage value* because there is no asset form in the end of period.

4. The comparison approach is performed as one of comparisons in determining the housing allowance amount by considering the hotel rental price amount according to the market value. The assumption for the allowance amount to be estimated shall be the hotel lease price in a region that is estimated simply without considering the width of the land and building as it is required by the Regulation of Minister of Finance No. 248/PMK.06/2011 concerning the Standards of Structures and Infrastructures for State Buildings.

3. RESEARCH METHOD

Based on the orientation, this was an applied research that was analyzed descriptively and comparatively. Based on the type, this was a combination of survey and census research. According to Singarimbun and Efendi (1989: 3) the survey research is a research taking a sample from a population and using questionnaires/guided interviews/check lists as main instruments to collect data. In the census research, the analysis unit in this appraisal research was the houses to lease or the house that had had transactions or agreements between owners and lessees. In the survey research, population in this survey were some houses in Mesuji district area that fulfilled aspects of social-economy. Population according to Singarimbun and Efendi (1989: 152) is all units for analysis that their characteristics are predictable. Samples in this survey were taken by using purposive sampling. According to Sugiono (2012:61) purposive sampling techniques is selecting samples by using certain considerations.

The consideration in selecting samples were (1) the locations of houses to survey fulfilled the principle of appropriateness concerning the construction and location for the Leaders/Members of Regional House of Representative; (2) the house types in the locations fulfilled criteria for official houses for members of Regional House of representative; (3) by social-economy the house locations that were surveyed had high "social value" and appropriate for official houses for Leaders and Members of Regional House of Representative.

4. DISCUSSIONS AND ANALYSIS OF RESULTS

A. Social-economy Approach

The social-economy approach discusses factors owned by houses that had been surveyed so that they differentiated rental prices/selling prices with other that surveyed houses. This social-economy analysis also discusses considerations of appropriateness for the official housing (state housing) that fulfill principles of appropriateness and/or fairness for being living places for Leaders and Members of Regional House of Representative in Mesuji district. In this social-economy analysis, there are some factors that are difficult to assess economically, but socially they have high values, so that they are more qualitative. These factors are:

1. **The geographical position of the house in the occupancy area**

   The geographical position of the house in the occupancy area means that the house located in the occupancy area that is publicly familiar should have a high social value. For example, locations in the Simpang Pematang or Brabasan and surrounding that are well known as the capital town of Mesuji district are well known by public and imaged as areas with higher social and economic values, because they are associated with the history of the making of Mesuji district and with the center of economy activities.

   In Brabasan kampong, the main roads such as jalan Zainal Abidin Pagar Alam, jalan raya Wiralaga, and in Simpang Pematang kampong, the roads of Lintas Timur and jalan Abdurrahman Sarbini, are main roads in Mesuji district that have high economic values because they become the center of economy activities. Meanwhile the new roads or passageways such as jalan raya KTM Tanjung Raya and jalan raya Gedung Ram are located in some developing areas. These factors make house rental price/selling price in that areas becoming higher than other areas, especially in rural areas.

   Therefore, the determination for official housing locations for Leaders and Members of Regional House of Representative in those locations shall be very proper, both in terms of locations and physical construction standards. Therefore, the housing allowance amount for members of Regional House of Representative shall represent the areas with high social and economy values. It is in accordance with the mandate of Circular Letter of Directorate General of Regional Financial Administration Number: 188.31/006/BAKD point 3.e. stating that the housing allowance amount should consider the principle of appropriateness by considering the proper physical/construction standards and locations of housing.

2. **Accessibility (the housing position towards roads)**

   Accessibility (housing position against roads) means the easiness access for the official house to be reached. This accessibility assess whether the house position is located in environment roads, local roads, collector roads, or arterial roads. The road size/classification is based on the functions of roads and from the smallest function to biggest one are environment road, local road, collector road, and arterial road. In addition, this accessibility also assess the width of the road close to the official house location.

   In general, the house located around arterial roads shall be having higher value than the house located around collector roads, local roads and environment roads. Therefore, the house rental price/selling price located around the arterial roads shall be higher than the house located around collector roads, local roads and environment roads. Areas around

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main roads from Simpang Pematang to Brabasan, Jalan Raya Brabasan (d.g. Jendral Sudriman), and roads around Brabasan such as Jalan ZA Pagar Alam and Jalan Gedung Ram are collector roads. Therefore, those areas have higher social values than other areas. Beside road classification, road width ($\geq$ 8 meter) is socially and aeconomycally influences the house rental price/selling price. Wider road socially and economically shall ease vehicles for the housing residences to drive in two lines and shall ease for guests to park their vehicles in the edge of the road (on-street parking).

Therefore, it is proper and appropriate when the official housing for Leaders and Members of Regional House of Representative in Mesuji district is located in the edge of arterial roads, collector roads, or located in areas with road width of $\geq 6 - 8$ meters. This consideration has arisen because members of people representatives should physically be easy to access by their constituents and they deserve to have easy access into their workplaces. In addition, the road width ($\geq$ 8 meter) socially and economically shall ease members of regional House of Representative to receive their constituents and guests in their houses.

3. The building landscape

External lay out or landscape is intended as facilities out of the house that are still surrounding the related house area. This landscape may include tidy garden, carport, and other elements outside the building. In common, almost all houses have front yard for garden, even though some houses only have front yard and some other have front yard and garden altogether. This condition is socially and economically influencing the house rental price/selling price.

4. Interior of the house

Interior of the house refers to kind and connection between spaces in a house building such as car garage, guest room, sleeping room, toilet, warehouse, maid's room, washing space, and so on. In the perspective of numbers of rooms, official housing standard for members of Regional House of Representative (echelon II), as mandated by the Regulation of Minister of Public Work No. 22/PRT/M/2008 Article 5 paragraph 1c in Attachment I.1 and Regulation of Minister of Finance (PMK) No. 7/PMK.06/2016 as a revision for Regulation of Minister of Finance (PMK) No. 248/PMK.06/2011 Article 5 paragraph 1 in Attachment I, it is stated the standard for type and numbers of rooms for state housing (type B for echelon II) is detailed in Table 1.

The availability of housing completeness (rooms/spaces, non-furniture) socially and economically shall influence the house rental price/selling price and this shall be higher when the house is located in a particular area that is considered to have higher social value according to public assessment.

Table 1. Standard of Space for State Housing for Leaders and Members of Regional House of Representative

Description	Type A	Type B
Gest Room	1	1
Working Room	1	1
Living Room	1	1
Functional Space	-	-
Dining Room	1	1

Description	Type A	Type B
Sleeping Room	4	3
Bathroom/toilet	2	1
Kitchen	1	1
Warehouse	1	1
Garage	1	1
Maid's Room	2	1
Washing space	1	1
Maid's Bathroom	1	1

Source: PMK No. 7/PMK.06/2016 as revision upon PMK No. 248/PMK.06/2011

5. **Numbers of house floor**

Numbers of house floor refers to whether a house has single floor and/or has second floors (multiple floors house). Even though numbers of house floor has never been discussed in the legislations and regulations concerning standard of type and numbers of rooms of the official/state housing, the facts show that most houses that fulfill criteria for standard of type and numbers of rooms as stated in Table 1 are multiple floor houses (houses with two floors). These facts were found in the survey for determining the housing allowance amount for Leaders and Members of Regional House of Representative in Mesuji district. This condition influenced house rental price/selling price because most of surveyed houses did not meet the availability of minimum rooms as they were regulated in the Regulation of Minister of Finance of Republic of Indonesia No. 7/PMK.06/2016 as the revision for the Regulation of Minister of Finance of Republic of Indonesia No. 248/PMK.06/2011 aforementioned above.

6. **The width of land and building**

The width of land and building are influential to the house rental price/selling price. Especially if the house is located in a residential area that is perceived to have high social value by public, such as the area in Brabasan and its surrounding and area in Simpang Pematang and its surrounding, the house rental price/selling price shall be more expensive compared to other areas (rural areas). Therefore the housing allowance amount should consider the principle of fairness by considering standard of physic/construction and housing location that are proper to provide for Leaders and Members of Regional House of Representative. The standard of physic/construction and housing location in those areas are considered to be proper and fair for official housing for Leaders and Members of Regional House of Representative in Mesuji district, even though factually the houses require additions and improvements in some parts of houses.

Standard of land and building width for the chairman, vice chairman, and members of Regional House of Representative can be found in two regulations. First, Attachment IIA of Regulation of Minister of Domestic Affair Number 7 in 2006 concerning Standardization of Work Structures and Infrastructures for Regional Government, secondly, the Regulation of Minister of Finance No. 7/PMK.06/2016 Article 5 Paragraph 2 in Attachment I and II and followed by the Regulation of Minister of Public Work No. 22/PRT/M/2008 Article 5 in Attachment I.1. as it is explained in Table 2 and Table 3.

Table 2. Standard for Maximum Land and Building Width for State/Official Housing (According to Regulation of Minister of Domestic Affair Number 7 in 2006)

No.	Housing for	Maximum building Width	Maximum Land Width
1.	Chairman of Regional House of Representative	300 m²	750 m²
2.	Vice Chairman of Regional House of Representative	250 m²	500 m²
3.	Members of Regional House of Representative	150 m²	350 m²

Table 3. Standard for Maximum Land and Building Width for State/Official Housing (According to Regulation of Minister of Finance No. 7/PMK.06/2016)

No.	Type of House *)	Building Width	Land Width
1.	Special Type (Minister)	400 m²	1.000 m²
2.	Type A (Echelon I)	250 m²	600 m²
3.	Type B (Echelon II)	120 m²	350 m²
4.	Type C (Echelon III)	70 m²	200 m²
5.	Type D (Echelon IV)	50 m²	120 m²
6.	Type E (Echelon V)	36 m²	100 m²

*) Official housing for leaders of Regional House of Representative equals to Type A house, while for members of Regional House of Representative equals to Type B house.

7. Building construction

Building construction means house physical conditions including building foundation, floor, wall, wall paint, ceiling, roof, fence, and so on. A house with visually sturdy, new, maintained construction shall have higher rental price/selling price than the others. Houses with high/good/sturdy constructions are usually located in the areas perceived as having higher social value by public.

Based on the analysis of social and economy appropriateness, the locations that are proper for housing for Leaders and Members of Regional House of Representative in Mesuji district by fulfilling criteria that have been mentioned above are in Tanjung Raya and Simpang Pematang areas, especially in Brabasan kampong and Simpang Mesuji, because location in those kampongs are identified as proper properties for residential places for Leaders and Members of Regional House of Representative in Mesuji district. In the accessibility perspective, the proper locations as residential places for Leaders and Members of Regional House of Representative in Mesuji are located ± 2-3 kilometers from Mesuji downtown. The intended locations are located in Brabasan Kampong and Simpang Pematang Kampong, or its located ± 178 kilometers from Bandar Lampung downtown (Adipura monument) or the center of government of Lampung province. The center of activities of Regional House of Representative in Mesuji district is located in Brabasan Kampong, particularly in Jalan Zainal Abidin Pagar Alam.

B. Market Approach

The market approach produces indicators for amount value by comparing valued assets to other identical or comparable assets, where information of transaction prices or offering prices in the field are required (clarity of objects). In this market approach, the first step is to consider new

prices and prices that have already occurred in the asset transaction market that are identical or comparable. If the transactions are too few, offered prices (rental prices) of prices listed for identical or comparable assets can be used, and the relevance of this information must be understood clearly and analyzed carefully. In his case, adjustment upon the transaction price information or offering is required if there is any difference with actual transactions. The differences may include characteristics of legal, economy or physic of the assets being transacted and assessed (SPI. KPUP.17: 2015).

The market rental values are obtained from analyses on transactions, offerings and demands of similar properties located in the intended location by considering other comparing factors such as: location, building condition, physical characteristics of building (numbers of room, numbers of toilet, car garage, and building facilities), accessibility, environmental factors, security factors, economy factors, and other factors influencing assessments.

Based on the survey results, it can be concluded that the house/building rental prices in Mesuji district are varying, especially in rural and urban areas. It is caused by, the first, the house location. The house location becomes a factor determining the rental price from its owner. The considerations are the accessibility and reachability of the house location from strategic locations such as markets, hospitals, office areas, and so on. Second, the house floor width, and this influences the amount of rental price. A house with wider floor shall make higher price even though it is located at the same location. This information is collected from some housing rental offering prices upon some properties from property agents and public.

Table 4. Comparison Data for Rental Houses in Mesuji District

No	Type of Property	Width (m²)		Location	Rental Price Offering (Rp)/year	Source
		Floor	Building			
1	Residential House	2,500	84	Jl. A. Sarbini	20,000,000	Misron
2	Residential House	1,250	221	Jl. A. Sarbini	90,000,000	Suharti
3	Residential House	200	54	Jl. A. Sarbini	15,000,000	Nasib
4	Residential House	1,000	360	Jl. A. Sarbini	100,000,000	Suprantio
5	Residential House	1,500	650	Jl. Pagar Alam	70,000,000	Eko K.
6	Residential House	5,000	158	Jl. Pagar Alam	102,000,000	Musta'in
7	Residential House	96	28	Jl. A. Sarbini	20,000,000	Suprantio
8	Residential House	3,750	193	Jl. Pagar Alam	100,000,000	Rosida

Source: Survey Result in 2017.

The data above have been adjusted for factors including internal condition of the houses and their surrounding environment conditions, and so on, toward the assessment objects including rental tax.

Table 5. Recapitulation of Rental House Comparing Data (Simulation for Official House for Chairman of Regional House of Representative <A-1>)

Comparing data	Rental price/offering	Realization Estimation	Land Width	Building width	*After Adjusment*
1	20,000,000	18,000,000	2,500	84	89,265,000
2	90,000,000	90,000,000	1,250	221	109,230,000
3	15,000,000	15,000,000	200	54	101,970,000
4	100,000,000	100,000,000	1,000	360	100,155,000
5	70,000,000	70,000,000	1,500	650	41,745,000

Comparing data	Rental price/offering	Realization Estimation	Land Width	Building width	*After Adjusment*
				Monthly Rental Price (MINIMUM)	3,479,000
				Monthly Rental Price (AVERAGE)	7,372,750
				Monthly Rental Price (MAXIMUM)	9,103,000

Source: Adjustment Result, 2017.

Adjusment was performed because no one from house rental data concerning the land width, building width, and criteria of rooms that were in accordance with provisions. Based the initial data and adjustment analysis, the assessment results that are close to the comparable House Rental Values to the housing allowances are as follows:

Table 6. Executive Summary of the Housing Allowance Assessment according to Market Approach (Based on Regulation of Minister of Domestic Affair No. 7 in 2006)

Assessment Object	Volume	Indicator of Housing Allowance *) (Rp)		
		Minimum	Average	Maximum
(1)	(2)	(3)	(4)	(5)
Single Floor Residential House Type A for Chairman of Regional House of Representative:		3,479,000	7,373,000	9,103,000
A. Land	750 m²			
B. Building	300 m²			
Single Floor Residential House Type A for Vice Chairman of Regional House of Representative:		2,554,000	5,715,000	7,035,000
A. Land	500 m²			
B. Building	250 m²			
Single Floor Residential House Type A for Members of Regional House of Representative:		1,430,000	3,513,000	5,074,000
A. Land	350 m²			
B. Building	150 m²			

*) Including Final Income Tax 10% Article 4 paragraph (2).

Table 7. Executive Summary of the Housing Allowance Assessment according to Market Approach (Based on Regulation of Minister of Finance No. 7/PMK.06/2016)

Assessment Object	Volume	Indicator of Housing Allowance *) (Rp.)		
		Minimum	Average	Maximum
(1)	(2)	(3)	(4)	(5)
Single Floor Residential House Type A for Leaders of Regional House of Representative:		2,874,000	6,185,000	8,282,000
A. Land	600 m²			
B. Building	250 m²			
Single Floor Residential House Type B for Members of Regional House of Representative **):		1,645,000	3,550,000	4,765,000
A. Land	490 m²			
B. Building	120 m²			

*) *Including Final Income Tax 10% Article 4 paragraph (2).*

**) *For members of Regional House of Representative (*) by considering tolerance for land width of 40% from predetermined standard (from 300 m² into 490 m²)*

C. Investment approach

The investment approach is an approach to estimate the housing allowance amount based on a concept of Investment Theory on residential house that is purchased by installment in a certain period by considering a proper and minimum investment level by using prevailing loan interest rate. However, this approach ignores the final value of the projection period; the remaining value of an asset, that is called as *terminal value* or *salvage value* because it cannot be in form of asset in the end of period.

The estimation simulation of the cost to build/invest on official housing/property is based on the market value or the Sales Value of Taxable Object (NJOP) multiplied by standard price of building according to building type. The cost is then divided with the months of service of the Leaders/Members of Regional House of Representative (2 periods/10 years/120 months). The result of division is made as one of references to provide an alternative for the housing allowance amount that shall be given each month to the Leaders and Members of Regional House of Representative in Mesuji district.

This investment approach is differentiated into 2 (two) technical analyses and 3 (three) types. They are technical analysis on the housing allowance amount for leaders (chairman and vice chairman) and technical analysis on the housing allowance amount for members of Regional House of Representative in Mesuji District. This differentiation is in accordance with the mandates in Attachment IIA of Regulation of Minister of Domestic Affair Number 7 in 2006 concerning Standardization of Work Structures and Infrastructures of regional Government, Regulation of Minister of Domestic Affair Number 7 in 2006 Article 11 in Attachment Chapter IIIB, and Circular Letter of Directorate General of Regional Financial Administration Number 188.31/006/BAKD point 3.e. that providing the housing allowance amount should consider the principle of appropriateness that pays attention to grading principle so that the housing allowance for members of Regional House of Representative should not bigger than for the Vice Chairman of Regional House of Representative, and similarly the housing allowance for the Vice Chairman should not be bigger than for the Chairman of Regional house of Representative.

Method to use in differentiating the housing allowance amounts between Leaders and Members of Regional house of Representative in Mesuji district is by differentiating the land width of the building to rent. This method refers to (1) Attachment IIA of Regulation of Minister of Domestic Affair Number 7 in 2006 concerning the Standardization of Work Structures and Infrastructures of Regional Government; (2) Regulation of Minister of Domestic Affair Number 7 in 2006 Article 11 in Attachment Chapter IIIB; and (3) Regulation of Minister of Public Work Number 22/PRT/M/2008 Article 5 paragraph 2 stating that the land for state/official housing can exceed the maximum limit with maximum tolerance based on location. In a capital town of a district/municipal it can exceed 40% (forty percent).

Therefore, in the investment analysis for official house for members of Regional House of Representative in Mesuji district (in the capital town of district) shall use assumption of building width = 150 m^2 and land width = 350 m^2. The technical analysis for official housing for Vice Chairman of Regional House of Representative shall use building width = 250 m^2 and land width = 500 m^2, and building width = 300 m^2 and land width = 750 m^2 for the Chairman. The analysis shall also use comparison of building width = 250 m^2 and land width = 600 m^2 for leaders of regional house of Representative and building width = 120 m^2 and land width = 490 m^2 for members of Regional House of Representative from the land width that should have been just 300 m^2.

This investment analysis thought is based on the Regulation of Government of Republic of Indonesia Number 37 in 2005 Article 25 paragraph 3 (e), where the explanation states that capital expense shall be used, among others, for construction/expansion/adding office/official house buildings for members of Regional House of representative, office equipment, procurement of official vehicles for leaders of Regional House of representative that improve the value regional wealth.

In addition, the Circular Letter of Directorate General of Regional Financial Administration Number 188.31/006/BAKD point 3.e. states that the principle of rationality in providing the housing allowance must consider service duration of 60 (sixty) months so that this shall be more efficient and profitable when building official housing for leaders and/or members of Regional House of Representative. The technical analysis is based on the assumption of monthly allowance expense that is budgeted for leaders/members of Regional House of Representative, and when this is multiplied with 10 years period (120 months), the total amount can be used for constructing one official house.

The logical assumption in determining the rental price for official house of members of Regional House of Representative can refer to installment mechanism of housing funding loan (KPR). The government is assumed to perform investment by paying property installment in a certain period of time. In this case, the rental price is assumed to be monthly installment of housing funding loan, by estimating the bank interest rate, the term of loan/rent, and the magnitude of property value to rent.

The technical assessment of house rental price refers to economic assessment to the building value, land price, and prevailing bank interest rate. The method to use in simulating funding is estimation of financial property function of PMT (payment). PMT is a formula to estimate the installment value periodically to pay off the loan value based on a period, constant payment, and constant interest rate. PMT (payment) is used to determine the amount of value for each time installment payment with effective interest in a certain period of time. The use of this method is performed with an assumption that rental price is the installment value like

investment installment in a certain period of time. Estimation with this method is considered to be the most suitable and make sense in determining the house rental price.

The equation of payment estimation by using PMT is as follows:

$$PMT = \frac{(PV(1+i)^n + FV)\,i}{1 - (1+i)^n}$$

where:

PMT = *Payment*, monthly payment value
PV = Present Value, the current loan value/building value/property value.
FV = Future Value, the loan value/property value in the future/end of installment/rent
n = interest rate

The main required components in the PMT (payment) method are:

rate = current interest rate of 6.5% per annum
nper = term of rent/loan, period of service of members of Regional House of representative is 5 years/60 months (Circular Letter of Directorate General of Regional Financial Administration Number: 188.31/006/BAKD point 3.e.) or 10 years/120 months.
pv = loan/property value, based on estimation result of official house /property construction cost.

The amount of loan/property value is based on the estimation result of official house /property construction cost. The main required components in estimating loan/property value are:

a). The unit price for construction of a State Building for sub-construction for State House Type A in Mesuji district is Rp. 4,810,000/m² and Rp. 4,480,000/m² for Type B (based on the publication of Unit Price for State Building in Lampung Province in 2016 from Irrigation and Settlement Office in Lampung province).

b). The building width = 150 m² and land width = 350 m² for members of Regional House of Representative; the building width = 250 m² and land width = 500 m² for Vice Chairman of Regional House of Representative; and the building width = 300 m² and land width = 750 m² for Chairman of Regional House of Representative, by following provision for official house width that is regulated in the Regulation of Minister of Domestic Affair Number 7 in 2006 concerning Standardization of Work Structures and Infrastructures for Regional Government.

c). The building width = 120 m² and land width = 350 m² can be expanded 40 for land width in the capital town of district/municipal into 490 m² for members of Regional House of Representative, and the building width = 250 m² and land width = 600 m² for leaders of Regional House of Representative according to Regulation of Minister of Finance Number 6 in 2007.

d). The Sales Value of Taxable Object (NJOP) in legal document of Notification Letter for Payable Tax (SPPT) for Land and Building Tax (PBB) is Rp. 20,000/m² (twenty thousand rupiah, based on physical survey in Jalan ZA Pagar Alam, Brabasan Kampong, and Tanjung Raya sub district) and Rp. 27,000/m² (twenty seven rupiah, based on physical survey in Jalan Suku 3, Simpang Mesuji Kampong, and Simpang Pematang sub district)

e). The market price for land in those locations based in transaction data by Mr. Mislan as land seller and Mr. Mariman as land buyer (data legality on transaction in 26 January 2015 in Brabasan Kampong) is Rp. 437,500/m² (four hundred thirty seven thousand and five hundred rupiah).

Based on the data above, the following is the simulation for estimating house rental cost by using PMT method based on the land market price and standard price of state building in Mesuji district foe members and leaders (chairman and vice chairman) of Regional House of Representative.

C.1. Simulation for House Rental Amount Based on Land Width/Building Width According to Regulation of Minister of Domestic Affair Number 7 in 2006

In the simulation for house rental amount based on land width/building width according to Regulation of Minister of Domestic Affair Number 7 in 2006, the land price based on market price is Rp. 400,000/m². The unit price for state house construction is Rp. 4,480,000/m². The land width = 350 m² and building width = 150 m² for members of Regional House of Representative, and Rp. 4,810,000/m² is multiplied with building width = 250 m² and land width = 500 m² for Vice Chairman of Regional House of Representative, and building width = 300 m² and land width = 750 m² for Chairman of Regional House of Representative. Current loan interest rate is 6.5%.

The term of rental/loan is assumed by using service period of members of Regional House of Representative during 2 (two) periods or 10 years (120 months), with a consideration that the Sales Value of Taxable Object (NJOP) is far lower than land market price in Mesuji district. This is intended to satisfy the provisions in the Circular Letter of Directorate General of Regional Finance Administration No. 188.31/006/BAKD point 3.e., that the housing allowance providing must fulfil the principle of rationality, where the amount for housing allowance for 120 (one hundred and twenty) months shall be more efficient and profitable than building official houses for Leaders of House of Representative and/or official housing for members of Regional House of Representative. Therefore, the value estimation for the investment approach shall be 120 months period with interest rate of 6.5% per annum.

Table 8. The Simulation Result for House Rental Amount for Chairman of Regional House of Representative (land and building width based on Regulation of Minister of Domestic Affair Number 7 in 2006)

Rental term	:	10 years/120 months	
Land width	:	750 m²	
Building width	:	300 m²	
Land market price	:	400,000/m²	
Building price	:	4,810,000/m²	
Investment value of land and building	:	1,743,000,000	
Rental price/month (Housing allowance)	:	14,843,559	*) excluding tax

Table 9. Simulation Result for House rent Amount for Vice Chairman of Regional House of Representative (land and building width based on Regulation of Minister of Domestic Affair Number 7 in 2006)

Rental term	:	10 years/120 months
Land width	:	600 m²

Building width	:	250 m^2
Land market price	:	400,000/m^2
Building price	:	4,810,000/m^2
Investment value of land and building	:	1,402,500,000
Rental price/month (Housing allowance)	:	11,943,828

*) excluding tax

Table 10. Simulation Result for House Rental Amount for Members of Regional House of Representative (land and building width based on Regulation of Minister of Domestic Affair Number 7 in 2006)

Rental term	:	10 years/120 months
Land width	:	350 m^2
Building width	:	150 m^2
Land market price	:	400,000/m^2
Building price	:	4,480,000
Investment value of land and building	:	812,000,000
Rental price/month (Housing allowance)	:	7,837,081

*) excluding tax

This simulation result shows that the proper rental price (housing allowance) shall be Rp. 7,837,081 per month for members of Regional House of Representative, Rp. 11,943,828 per month for Vice Chairman of Regional House of Representative, and Rp. 14,843,559 per month for Chairman of Regional House of Representative. This value may go up and down depending on the property locations or the differences in land market prices.

C.2 Simulation for House Rental Amount Based on Land Width/Building Width According to Regulation of Minister of Finance Number 7/PMK-06/2016

the simulation for house rental amount based on land width/building width according to Regulation of Minister of Finance Number 7/PMK-06/2016, the land market price is Rp. 400,000/m^2. The unit price for house state building is Rp. 4,810,000/m^2. The land width = 600 m^2 and building width = 250 m^2 for Chairman and Vice Chairman of Regional House of Representative; Rp. 4,480.000/m^2 multiplied by building width = 120 m^2 and land width = 490 m^2 for members of Regional House of Representative by considering the tolerance for maximum land width. The current loan interest rate is 6.5%.

The rental/loan term is assumed by using 2 (two) periods of service of members of Regional House of Representative or 10 years/120 months, by considering the Sales Value of Taxable Object (NJOP) that is far lower than land market price in Mesuji district. This is intended to satisfy the provisions in the Circular Letter of Directorate General of Regional Finance Administration No. 188.31/006/BAKD point 3.e., that the housing allowance providing must fulfil the principle of rationality, where the amount for housing allowance for 120 (one hundred and twenty) months shall be more efficient and profitable than building official houses for

Leaders of House of Representative and/or official housing for members of Regional House of Representative.

Table 11. Simulation Result for House Rental Amount for Leaders (Chairman and Vice Chairman) of Regional House of Representative (land and building width based on Regulation of Minister of Finance Number 7 in 2016)

Rental term	:	10 years /120 months
Land width	:	600 m²
Building width	:	250 m²
Land market price	:	400,000/m²
Building price	:	4,810,000/m²
Investment value of land and building	:	1,442,500,000
Rental price/month (Housing allowance)	:	12,284,472 *) excluding tax*

Table 12. Simulation Result for House Rental Amount for Members of Regional House of Representative in Mesuji district (land and building width based on Regulation of Minister of Finance Number 7 in 2016)

Rental term	:	10 years/120 months
Land width	:	490 m²
Building width	:	120 m²
Land market price	:	400,000/m²
Building price	:	4,810,000/m²
Investment value of land and building	:	733,600,000
Rental price/month (Housing allowance)	:	7,080,398 *) excluding tax*

This simulation result shows that the proper rental price (housing allowance) shall be 7,080,398 per month (for members of Regional house of Representative) and Rp. 12,284,472 per month for Leaders of Regional house of Representative. This value may go up and down depending on property locations that imply the changes of legal land market prices.

D. Comparison Approach with Hotel Rental Cost

One of comparisons to determine the housing allowance amount is by considering the hotel rental cost according to market price in the Mesuji district area, that is estimated in simple way without considering the land width and building width as it is required by Regulation of Minister of Finance No. 248/PMK.06/2011 or by Regulation of Minister of Domestic Affair No. 7 in 2006. The approach by using hotel data is not used because it is not comparable not in similar kind.

Table 13. Hotel Cost per Night in Mesuji District

No	Name of Hotel	Price per Night (Rp)	
		Class 1	VIP Class
1	Hotel Azzam	300,000	350,000
2	Hotel Selalau	200,000	250,000
3	Hotel Keluarga	200,000	250,000

Tabel 14. Hotel Cost per Month in Mesuji District

No	Name of Hotel	Price per Month (Rp)	
		Class 1	VIP Class
1	Hotel Azzam	9,000,000	10,500,000
2	Hotel Selalau	6,000,000	7,500,000
3	Hotel Keluarga	6,000,000	7,500,000

With an assumption that hotel rental cost is estimated in monthly base (30 days), then the housing allowance amount based on this method shall be between Rp. 7,500,000 to Rp. 10,500,000 each month. Assuming that the Class 1 hotel room is for members of Regional House of Representative, the average cost shall be Rp. 7,000,000. Assuming that VIP room is for Chairman and Vice Chairman of Regional House of Representative, the average rental cost shall be Rp. 8,500,000 each month. However, the approach for determining housing allowance amount by assuming hotel rental price is considered to be weak and technically considered to be not similar/incomparable/not the same kind with standards or provisions of land width and building width as this is regulated in legislations and regulations.

5. CONCLUSIONS

There are four methods/basic approaches in determining the housing allowance amount. They area (1) social-economy approach by considering appropriateness and fairness of geographic locations, accessibility, exterior lay out (landscape), interior, and construction of a house (it does not produce price – qualitative--); (2) market approach by determining price with real object assessment method (appraisal) (producing estimation of house rental market price – quantitative --); (3) investment approach to determine price by using assumption method for house construction in 10 years period and by using price standard and width standard according to prevailing provisions (producing estimation of house investment value – quantitative --); and (4) comparison approach by providing comparison of hotel rental price without considering the building width (based on stay rate) (producing comparison data/price – quantitative--).

However, the assessment result on the housing allowance through comparison approach by assuming the hotel rental price cannot be used as a reference because it is considered to be weak technically because comparing something that is not the same kind/incomparable/and unequal to standard and provision of width as it is regulated in legislations and regulations. Therefore, in addition to a requirement to use social and economy approach that produces qualitative data, there are only other two approaches (the market approach and investment approach) that can be used.

These two approaches can be considered to determine alternatives because the assessment of price estimation is based on market price (rent/sell) in Mesuji district. However, the market approach has higher accountability degree compared to investment approach.

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