

Commune-level Development Data Governance in Digital Government: Institutional Gaps and the Responsibility-Data Alignment Framework

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Abstract: This policy-oriented review examines the theoretical and institutional foundations of commune-level development data governance in the context of Viet Nam's two-tier local government model and evolving national data architecture. Drawing on legal and policy documents, academic literature, and authoritative international sources, it identifies institutional design gaps between commune-level development responsibilities and the data conditions needed to carry them out. The article proposes two closely related concepts: Commune-Level Development Data Governance (CDDG) and the Responsibility-Data Alignment Framework (RDAF). RDAF systematizes the relationships among governance responsibilities, functional data needs, data rights, operational mechanisms, data-use capacity, and public value. This analysis focuses on institutional design rather than the empirical performance of individual localities.

Keywords: *Data governance; digital government; commune-level government; commune-level development data governance; responsibility-data alignment; public value.*

JEL Classification: H83; D73; H77.

1. Introduction

Digital transformation in the public sector is no longer merely a technological or technical matter; it is increasingly a means of renewing national governance. In Viet Nam, Politburo Resolution No. 57-NQ/TW dated December 22, 2024 identifies science and technology, innovation, and digital transformation as strategic breakthroughs for strengthening competitiveness, the quality of growth, and national governance capacity, while also calling for institutional reform, digital infrastructure development, data protection, and stronger digital capabilities among public officials (Politburo of the Communist Party of Viet Nam, 2024).

At the legal and policy level, the 2023 Law on Electronic Transactions, the 2024 Data Law,

and subsequent regulations and architecture frameworks have progressively established foundations for the creation, governance, connection, sharing, and use of data in the public sector (National Assembly of Viet Nam, 2023, 2024; Government of Viet Nam, 2025a, 2025b; Prime Minister of Viet Nam, 2025). These developments indicate a gradual shift in digital transformation from process digitization toward organizing and using data for governance.

In this context, communes, wards, and special zones (collectively referred to as the commune level) are particularly important. The 2025 Law on Organization of Local Government establishes a two-tier local government model oriented toward streamlined, effective, efficient, and modern governance and stronger

digital transformation (National Assembly of Viet Nam, 2025). Commune-level authorities directly perform numerous state-management and development-governance functions within their territories, interact regularly with citizens and businesses, and address issues arising in community life. Expanded governance responsibilities at this level therefore generate corresponding information and data requirements.

However, territorial governance responsibilities and data authority are not necessarily organized in the same way. Much of the data concerning a locality is managed in national databases, sectoral databases, or provincial systems, while commune-level access, verification, updating, feedback, and correction requests depend on functions, authority, system-specific rules, and decentralization arrangements. The issue is therefore not simply whether commune-level authorities have data, but whether assigned governance responsibilities are aligned with the data conditions required to perform them.

The central research question is therefore: To what extent does the current institutional framework align commune-level development-governance responsibilities with the data conditions required to fulfill them? The article adopts a policy-oriented review approach, combining documentary and institutional analysis with international experience to identify institutional linkages that still require specification.

On this basis, the article proposes two closely related concepts: Commune-Level Development Data Governance (CDDG) and the Responsibility-Data Alignment Framework (RDAF). CDDG defines the institutional scope of data governance for commune-level development, while RDAF provides an analytical structure for examining alignment between governance responsibilities and corresponding data

conditions. The study thereby seeks to clarify the institutional foundations of data-driven development governance at the commune level as Viet Nam continues to develop digital government and national data systems.

2. Theoretical foundations and research methods

2.1. Theoretical foundations

The study approaches commune-level development data governance not as a purely technological or database-building issue, but as a question of alignment among governance responsibilities, conditions for data use, and the public outcomes to be achieved. The theoretical framework therefore draws on three complementary perspectives: public value, digital-era governance, and data governance.

The first pillar is the public-value perspective. The public sector is responsible not only for procedural compliance but also for creating socially meaningful value, including service quality, equity, safety, sustainable development, public trust, and capacity to solve public problems (Benington & Moore, 2011; Cordella & Bonina, 2012). At the commune level, public value is reflected in responsibilities directly connected to citizens and localities, such as public service delivery, social protection, infrastructure, environmental and land management, and handling citizen feedback and petitions. Data are therefore not an end in themselves but a resource for fulfilling public responsibilities. The relevant question is which data each governance responsibility needs and what public outcomes their use is intended to support.

The second pillar is digital-era governance. Dunleavy et al. (2006) argue that digital-era governance is not simply introducing technology into administrative machinery;

it also involves reintegrating fragmented functions, organizing services around user needs, and digitizing governance processes. An administrative system may be digitized while data remain organized in separate agencies, sectors, or specialized systems, even though local development problems are often cross-sectoral and require data from multiple sources. Data-driven governance therefore requires connecting, sharing, and reusing data in the performance of public functions.

The third pillar is data-governance theory. Abraham et al. (2019) define data governance as exercising authority and control over data management to increase data value while reducing associated costs and risks. The issue is thus not merely the existence of databases or system access, but how decision rights over data, responsibility for data quality, data standards, sharing mechanisms, risk controls, and accountability are allocated across actors.

This perspective is directly relevant to commune-level data governance because territorial governance responsibility does not imply ownership of, or unrestricted authority to alter, all related data. Central, sectoral, or provincial authorities may manage data, while commune-level authorities need specific operations to perform assigned tasks, such as querying, analyzing, verifying, contributing information, requesting corrections, or updating data for which they are responsible. Data rights in this study therefore refer to a set of permissions and operations defined by function, role, purpose, and data characteristics rather than to a single general right of access.

The three perspectives complement one another. Public value identifies the purposes and outcomes toward which data use is directed; digital-era governance clarifies the need to connect, reuse, and incorporate data into public functions; and data governance

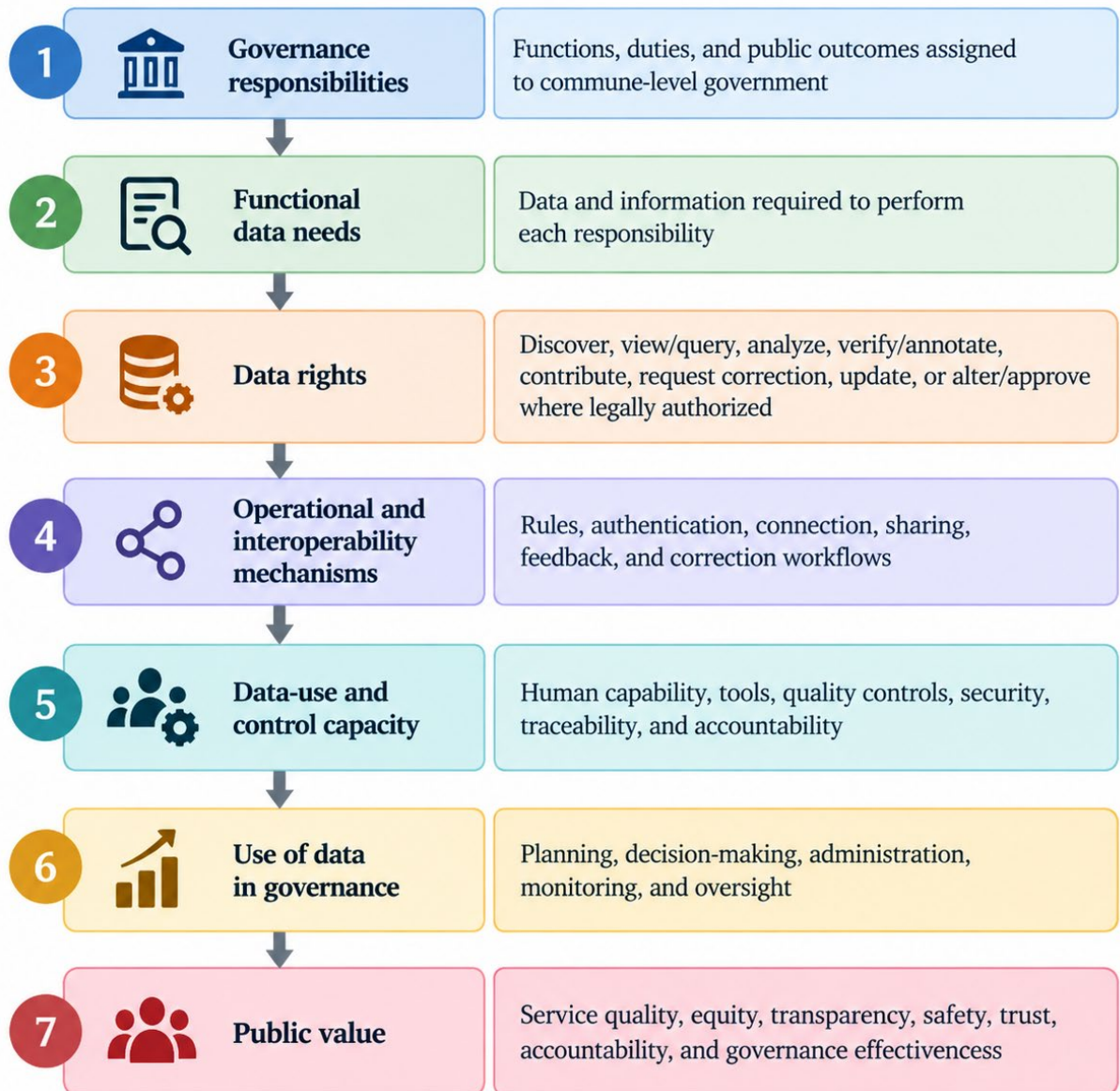
provides a basis for analyzing rights, responsibilities, and control mechanisms. Their intersection is the alignment between the architecture of public responsibility and the architecture of data.

Building on this synthesis, Commune-Level Development Data Governance (CDDG) is defined as a system of institutions, data rights, operational mechanisms, capacities, and safeguards that enables commune-level authorities to lawfully use authoritative data and data generated through local implementation for development governance, while preserving clear authority over source data, personal-data protection, data security, and accountability. CDDG does not imply creating an independent commune-level data system or transferring all data control to the commune level; rather, it emphasizes the institutional conditions that allow commune-level authorities to participate in the data lifecycle and use data in proportion to their assigned governance responsibilities.

To analyze this alignment, the study develops the Responsibility-Data Alignment Framework (RDAF), comprising six elements: (1) Governance responsibilities; (2) Functional data needs; (3) Data rights; (4) Operational and data-interoperability mechanisms; (5) Capacity to use and control data; and (6) The use of data in governance. These elements connect public responsibilities both to the data conditions required to fulfill them and to the use of data for creating public value.

RDAF, as shown in *Figure 1*, does not assume a simple linear relationship between governance responsibilities and data. Governance responsibilities generate functional data needs; those needs must be translated into appropriate data rights, operational and interoperability mechanisms, and capacities for data use and control. Data are then used for planning, decision-making,

**Figure 1. Responsibility-Data Alignment Framework (RDAF)
for commune-level development data governance**



Note: The framework incorporates interaction and two-way feedback for verification, correction, and institutional adjustment.

Source: Compiled by the author (2026).

administration, and oversight to create public value. Implementation and data use also generate feedback to verify, correct, and adjust related governance conditions. Requirements concerning security, personal-data protection,

quality, traceability, transparency, and accountability apply throughout this chain.

RDAF is a conceptual analytical framework developed through theoretical synthesis and

institutional analysis; it is not a causal model or an empirically validated measurement scale. CDDG defines the institutional scope of commune-level development data governance, while RDAF provides a structure for examining the degree of alignment between commune-level governance responsibilities and corresponding data conditions.

2.2. Research methods

This article is a policy-oriented review that uses documentary and institutional analysis to systematize the current regulatory framework, identify established elements, and identify components that remain insufficiently specified in the relationship between commune-level governance responsibilities and data. The approach focuses on institutional-design gaps and policy implications rather than measuring actual implementation performance in individual localities (Snyder, 2019).

The study draws on three groups of materials: Vietnamese political, legal, and policy documents concerning local government, digital transformation, data, connection and sharing, digital-government architecture, and national data governance; international academic literature on public value, digital-era governance, data governance, and data-driven public administration; and official reports and government documents used as international references for public-data governance.

In the institutional analysis, RDAF compares commune-level governance responsibilities with corresponding data conditions. For the functions examined, the study identifies institutionalized responsibilities, infers data needs from each function, and compares them with provisions on data rights, operational and interoperability mechanisms, capacity for data use and control, and the use of data for governance purposes. A

design gap is identified when a necessary relationship among these elements has not been institutionalized or sufficiently specified to clarify rights, responsible actors, operating mechanisms, and accountability.

The analysis distinguishes between content directly established by institutional documents and data requirements inferred from the nature of governance functions. The functional inferences are used to identify issues for institutional-design comparison, not actual implementation conditions in localities. Social protection, land administration, and planning and construction are used only to illustrate different configurations of data needs, not as comparative empirical cases.

International experience is likewise used as a reference for identifying relevant design principles and options, not as empirical evidence about commune-level conditions in Viet Nam. The gaps identified in this study therefore refer to institutional-design gaps or matters requiring further specification. Future case studies, interviews, and local operational data should test their practical prevalence, causes, and effects.

3. Viet Nam's policies on digital government and national data at the commune level

The political foundation for digital government and data governance in Viet Nam is embedded in the national agenda for science and technology, innovation, and digital transformation. Resolution No. 57-NQ/TW simultaneously emphasizes institutional reform, infrastructure development, data protection, information security, human-resource development, and stronger digital capacity among public officials (Politburo of the Communist Party of Viet Nam, 2024). Under this orientation, data are increasingly treated not merely as an output of computerization but as a resource for governance and development.

Legally, the *2023 Law on Electronic Transactions* provides a basis for electronic transactions by state agencies, with national databases, data connection and data sharing playing important roles in state management and public-service delivery (National Assembly of Viet Nam, 2023). The *2024 Data Law* further establishes a legal framework for data creation, development, protection, governance, processing, and use in connection with national digital transformation and socioeconomic development (National Assembly of Viet Nam, 2024). Decree No. 194/2025/ND-CP specifies provisions on national databases, data connection and sharing, and open data; Decree No. 278/2025/ND-CP establishes mandatory data connection and sharing among agencies within the political system (Government of Viet Nam, 2025a, 2025b). These instruments progressively establish the legal foundations for inter-agency data connection, sharing, and reuse.

Alongside the legal framework, national technical architecture and data governance continue to evolve. Version 4.0 of the Viet Nam Digital Government Architecture Framework guides a unified digital architecture for ministries, sectors, and localities, covering business, data, application, technology, information security, and cybersecurity layers (Ministry of Science and Technology, 2025). The National Data Architecture Framework, National Data Governance and Management Framework, and Common Data Dictionary Version 1.0 provide foundations for data standardization, organization, connection, sharing, and coordination, while specifying requirements for governance, quality, security, and responsibility (Prime Minister of Viet Nam, 2025). The National Data Strategy for 2026 - 2030, with a vision to 2045, further links data to infrastructure, resources, governance capacity, and data exploitation. Together, these components indicate a shift

from building separate information systems toward organizing and using data within a shared architecture.

For commune-level government, these changes coincide with the organization of the two-tier local government model. The *2025 Law on Organization of Local Government* establishes communes, wards, and special zones as the level of government directly responsible for many state management tasks within their territories, while emphasizing decentralization, delegation, and clear authority and responsibility at each level (National Assembly of Viet Nam, 2025). Sector-specific tasks continue to be assigned to the commune level in administration, population affairs, social protection, land, construction, environment, and local management and development. This makes the relationship between governance responsibilities and data conditions an important consideration in digital-government architecture.

The current legal framework also sets out principles for data management according to legal authority. The fact that data relate to a locality does not mean that the commune-level government has unrestricted authority over them. Access, updating, connection, and sharing depend on functions, duties, purposes of use, database-specific rules, and decentralization arrangements. Database owners issue procedures and rules for access and updating, while the updating agency is responsible for data accuracy at the time of update (Government of Viet Nam, 2025a). This arrangement preserves authority and responsibility for source data while enabling other agencies to use data for their functions.

Importantly, the current framework not only permits data access but also provides a basis for updating data through implementation activities. Decree No. 194/2025/ND-CP allows national databases to be updated from administrative-procedure results, proposals

for amendment or supplementation by agencies, organizations, and individuals, related databases, and other lawful sources (Government of Viet Nam, 2025a). This creates an institutional basis for authorities at the implementation level, including commune-level authorities within their assigned functions, to participate in data creation, verification, or feedback without acquiring authority to alter authoritative data managed by another agency.

Viewed through RDAF, the current policy framework contains core components concerning governance responsibilities, data, access and updating rights, connection and sharing, quality governance, security, and data capacity. The research issue is therefore not that Viet Nam lacks an institutional framework for data or that the commune-level government lies entirely outside the national data architecture. Rather, the issue is how these components are connected when considered in relation to specific groups of commune-level governance responsibilities.

Accordingly, current policy has established basic components relating to data-governance responsibilities, access and updating rights, data connection and sharing, quality governance, and control over commune-level data use. The remaining questions concern not only which rules govern data, but which actors may perform which data operations; how

data are provided and feedback is returned; how capacity and control responsibilities are defined; and how data may be used for local governance and development. The next section provides international references, while Section 5 analyzes these issues through RDAF.

4. International experience and reference implications for Viet Nam

International experience indicates that data-driven governance does not require concentrating all data in a single agency or granting implementing authorities unrestricted power to alter data managed elsewhere. More important is how countries organize role-based data rights, inter-agency connection and reuse, continued responsibility for authoritative data, and public-sector capacity to use data.

The article uses five countries as international references: the Republic of Korea, China, Estonia, Singapore, and the United Arab Emirates (*Table 1*). These countries have achieved advanced levels of development or made notable progress in digital government, integration, and public-data governance (Sayogo et al., 2024). They are not selected for direct institutional comparison with Viet Nam at the commune level, but to identify mechanisms relevant to components of RDAF.

Table 1. International experience in public-data governance and implications for Viet Nam

Country	Key mechanism	Implication for CDDG/RDAF
Republic of Korea	Institutionalizes data-driven administration, emphasizing data sharing and use, responsibility, and inter-agency coordination.	Links data use to public responsibility and highlights governance roles, data-management responsibilities, and organizational capacity.

Country	Key mechanism	Implication for CDDG/RDAF
China	Promotes government-data sharing and integration while limiting duplicate data collection.	Supports data reuse: a functional data need does not automatically justify recollecting the same information or creating a new commune-level database.
Estonia	Uses a distributed but securely interoperable data model, with authentication, logging, and continued responsibility of the authority managing source data.	Illustrates the distinction between rights to use data and authority over source data, emphasizing interoperability, traceability, and accountability.
Singapore	Uses shared platforms, digital identity, and inter-agency data connection through digital services.	Illustrates data as a shared service: rights can be operationalized through purpose-specific queries and services rather than transferring entire datasets.
United Arab Emirates	Connects data with digital-government strategy, agency responsibility, open data, artificial intelligence, and public-sector capability development.	Emphasizes data-use capacity, security, data ethics, and accountability; broader data use should be accompanied by safeguards.

Source: Author's compilation based on Page et al. (2021), Sayogo et al. (2024), and the official documents used in the study.

Viewed through RDAF, these references suggest five design principles. *First*, data rights should be defined by role and function and should not be equated with ownership or authority to alter source data. *Second*, data sharing should support reuse and limit duplicate collection. *Third*, interoperability should support two-way data flows so that authoritative data can serve the agency responsible for action while also enabling verification and feedback on data quality. *Fourth*, data use should include authentication, traceability, protection, and accountability. *Fifth*, infrastructure and data rights constitute governance capacity only when they are supported by data-use capabilities and oriented toward the creation

of public value.

These principles are not empirical evidence about the state of commune-level data governance in Viet Nam, nor do they imply that Viet Nam should copy any specific national model. They serve as reference points for comparing governance responsibilities with data architecture in Viet Nam's institutional context. The relevant question is therefore not whether commune-level government should have access to all national data, but which data rights are needed, for which data, to perform which responsibilities, through which control mechanisms, and for what public-value purposes.

5. Institutional design gaps in commune-level development data governance

Consistent with the research method, this section does not assess data-governance implementation in individual communes, wards, or special zones. Instead, it compares the architecture of commune-level governance responsibilities established in the current legal system with the data architecture established through data law, data-connection and sharing rules, and national digital-architecture frameworks. RDAF serves as an intermediate analytical framework covering governance responsibilities, corresponding data needs, data rights, operational mechanisms, data-use capacity, and public-value purposes.

A “gap” does not mean that every locality lacks data in practice, nor that the current legal system contains no data provisions. It describes a necessary linkage between a governance responsibility and a corresponding data condition that has not yet been institutionalized or sufficiently specified to identify responsible actors, rights, processes, and accountability. The analysis identifies five issue groups.

5.1. Gap in linking governance responsibilities with function-based data rights

The legal framework for local government and sector-specific regulations assigns commune-level authorities an increasingly broad range of responsibilities in population management, social protection, land, construction, environment, infrastructure, public-service delivery, citizen feedback and petitions, and local socioeconomic development. Meanwhile, the *Data Law*, national-database regulations, data-connection and sharing rules, and the National Data Architecture Framework establish common principles and infrastructure for public-sector data governance.

The institutional issue is not that these two systems are completely separate, but that the link between a specific commune-level governance function and the set of data rights required to perform that function has not yet been expressed as a unified structure. Under RDAF, a public responsibility does not automatically confer ownership or editing rights. The competent authority nevertheless needs clarity about which operations may be performed on which data and by whom: discovering the authoritative source; viewing or querying; aggregating and analyzing; verifying; contributing information; requesting correction; updating data for which the authority is responsible; or, where expressly provided by law, approving changes to authoritative data.

The reviewed documents show that system-level principles for connection, sharing, decentralization, management, and data use have been established. However, a systematic institutional matrix linking “commune-level function - data need - type of data right - data-managing authority - control mechanism” has not yet been fully articulated. The first gap is therefore one of functional alignment between the responsibility architecture and the data-rights architecture, rather than a general absence of data rights.

5.2. Gap in verification, feedback, and correction mechanisms at the implementation level

Decree No. 194/2025/ND-CP provides a basis for updating national databases using the results of administrative procedures, amendment or supplementation proposals from agencies, organizations and individuals, related databases, and other lawful sources. This indicates that the national data architecture is not a closed system; data can be supplemented and improved through public-management and service-delivery activities. From an RDAF perspective, however, data

generated at the local level, the right to verify data, and the authority to alter data must be distinguished. Direct contact with citizens and businesses, or observing local changes, does not automatically give commune-level government authority to alter source data managed by another body.

The key institutional question is therefore what commune-level authorities may do when they identify information that no longer reflects actual conditions: what operation may be performed; how evidence is submitted; which agency is responsible for verification; what response deadline applies; whether processing status can be tracked; and how responsibility for data quality is allocated among actors.

The document analysis shows that a general legal basis for updating, connecting, and sharing data exists, but it has not yet specified a unified feedback, verification, and correction process for each type of commune-level data relationship. This is a gap in the data-feedback loop, particularly important for the level of government closest to where population, economic-activity, and territorial-change data are generated or verified through implementation.

5.3. Gap in converting sectoral data into information for territorial development governance

Commune-level development-governance tasks do not always correspond to the boundaries of individual sectoral databases. Addressing a social-protection issue may require combining information on households, employment, insurance, and access to social services; spatial-development management may require cross-referencing land, planning, construction, population, and infrastructure information. These data needs are inferred from the structure of governance functions, not from empirical evidence that localities

currently lack such data.

The current data architecture is organized primarily around national databases, sectoral databases, and competent agencies' data systems. This is necessary for authenticity, management responsibility, and data standards. Commune-level development governance, however, is organized territorially and around public problems. Data may remain under the management of authoritative actors but must be assembled into indicators, data products, or information layers suited to specific territorial governance functions. The reviewed documents establish system-level interoperability, but do not yet fully specify a layer of data products designed for commune-level territorial development governance.

The gap is therefore not an empirical claim that localities "lack dashboards" or "lack digital maps." It is the incomplete institutionalization of requirements for converting data organized by source and sector into information that can be used for territorial governance functions.

5.4. Gap in the design of two-way data flows

The national data framework and data-connection and sharing rules represent a major shift from agencies independently collecting and storing data toward data that can be shared, reused, and coordinated across the state system. This is an important foundation for reducing fragmentation and duplication. From the commune-level position in RDAF, however, technical connectivity alone is insufficient; two directions of data flow must be distinguished.

The first direction consists of data created, verified, or generated through commune-level governance and transmitted to authoritative systems. The second consists of data from national, sectoral, and provincial databases being returned in an appropriate form for

commune-level authorities to perform their duties. If only the first direction exists, the commune level primarily supplies inputs to higher-level information systems. When the second direction is designed in accordance with functions, commune-level authorities also become data users in the performance of governance responsibilities.

The reviewed documents establish principles and infrastructure for data sharing, but do not yet specify in a unified structure which data or data products should be returned for each group of commune-level functions, at what level of detail, with what frequency, and under which access rights. The fourth gap therefore concerns the two-way design of the data lifecycle between commune-level authorities and authoritative data systems.

5.5. Gap in institutionalizing data-use capacity and data-management responsibilities at the commune level

Existing institutional frameworks address data governance and management, quality, security, inspection, supervision, auditing, classification, and the responsibilities of relevant actors (Government of Viet Nam, 2025b; Prime Minister of Viet Nam, 2025). These are foundational conditions of public-sector data governance. RDAF nevertheless indicates that access rights and connectivity infrastructure become governance capacity only when combined with data-use capability and clear responsibility for data use.

At the institutional-design level, this requires clarity on who coordinates data needs at the commune level; who checks and provides feedback on data quality; which actors may perform each operation; how data use is logged and audited; and what minimum capabilities users need to employ data in governance.

The reviewed documents establish data-

governance principles at national and system levels, but the organizational model for implementing these responsibilities in communes, wards, and special zones still requires further specification. The fifth gap lies in translating general data-governance principles into operational roles, processes, capabilities, and accountability at the commune level.

5.6. Synthesis of findings under RDAF

The five groups of gaps show that the institutional issue cannot be reduced to saying that commune-level authorities “lack data” or need to be “given more data rights.” Viet Nam’s legal framework already provides important foundations for national data, including connection, sharing, governance, security, and quality. The main gaps arise at the interfaces between the responsibility architecture of commune-level government and the data architecture of the state system.

Under RDAF, these interfaces include the transition from responsibilities to data needs; from needs to data rights; from rights to access, verification, and feedback mechanisms; from sectoral data to territorial data products; from technical connectivity to two-way data flows; and from access to controlled and accountable data-use capacity.

These findings also define the study’s limits. The identified gaps are institutional-design gaps derived from the document corpus; they are not evidence that all gaps manifest identically in every commune, ward, or special zone. This distinction provides the basis for moving from analytical findings to policy recommendations.

6. Discussion and policy recommendations

The analysis shows that the central issue in commune-level development data governance is not whether more data should be transferred to the commune level across the board, but

how to define data conditions proportionate to each governance responsibility. A public responsibility may require commune-level authorities to view, query, analyze, or verify data without necessarily granting authority to alter source data. Conversely, access alone does not create governance capacity without interoperability, feedback, data-use capability, and accountability.

RDAF therefore advances a principle of functional proportionality: data rights, data services, data-use capabilities, and control mechanisms should be designed according to the public function, the actor's role, the nature of the data, and the lawful purpose of use. CDDG does not imply transferring data ownership or concentrating all data at the commune level. Commune-level authorities may use authoritative data managed by other agencies through function-based rights and services, while participating in verification, contribution, feedback, or correction requests within the permitted scope. Four policy directions follow from the five groups of gaps identified above.

6.1. Institutionalize the relationship between commune-level governance responsibilities and corresponding data conditions

First, clarify the position of commune-level government in the National Data Framework and provincial digital-government architecture by treating it as an actor in the data lifecycle, without creating a separate data system outside the shared architecture. *Second*, a responsibility-data matrix based on RDAF could identify, for each group of commune-level functions, governance responsibilities, data needs, authoritative data sources, permissible rights, access or feedback mechanisms, and control responsibilities. This would shift institutional design from general access permissions toward function-based data rights.

A minimum data catalog for commune-level governance could then identify the data or data products required to perform specific tasks without implying that commune-level government owns or stores all of those data. Population, social protection, land, infrastructure, environment, public services, and local economic-development data can be specified according to function and authority.

6.2. Differentiate data rights and establish feedback, verification, and correction mechanisms

Instead of asking simply whether commune-level authorities “have access to data,” institutional design should distinguish layers of rights by function: discovering data sources; viewing or querying; analyzing and aggregating; verifying; contributing information; requesting correction; updating data that the commune level is responsible for creating; and altering authoritative data only where the law expressly assigns such authority.

Layered rights can expand data use without dispersing responsibility for source data. In particular, a feedback process is needed when information verified during local implementation differs from data managed by another agency. The process should identify the actor providing feedback, the evidentiary basis, the competent processing authority, the processing status and deadline, and the applicable traceability requirements. Commune-level proximity to implementation can thereby contribute to data quality without equating verification rights with unilateral authority over source data.

6.3. Develop two-way data flows and data products for territorial governance

Data connection should operate in both directions: data generated or verified through commune-level implementation should

enter authoritative systems, while data from national, sectoral, and provincial databases should be returned in forms suitable for territorial governance. Commune-level authorities do not need to copy or rebuild databases managed by other agencies. Shared architecture can instead provide necessary fields, indicators, or analytical products according to rights and purposes. Territorial data profiles, dashboards, digital maps, or alerts may be appropriate forms, but should be selected according to functional needs rather than imposed uniformly on all localities.

Two-way sharing should also be linked to data reuse and reduced duplicate collection. Where authoritative data already exist and may lawfully be shared, citizens, businesses, and commune-level authorities should not be required to provide the same information again.

6.4. Link data rights with capacity, control, and piloting before scale-up

Expanded data use must be accompanied by organizational capacity and control mechanisms. At the commune level, a focal point should coordinate data needs, data quality, and cooperation with sectoral agencies. Initially, this may be an assigned function within the existing structure rather than a new position or unit. Data capability should be developed in line with job roles, including the ability to understand and use indicators, identify anomalies, use data for planning and administration, comply with authorization rules, and protect personal data. Access, verification, updating, and correction requests should be authenticated and logged so that data rights remain linked to accountability.

Because this study is based on documentary and institutional analysis, these recommendations are design directions that require practical testing. Selected localities and governance

functions could pilot RDAF by examining alignment among responsibilities, data needs, data rights, operational mechanisms, and outcomes. Evaluation indicators could include processing time, reductions in duplicate data collection or reporting, data quality, correction-request processing time, and the extent to which data are used in governance decisions.

Overall, improving CDDG does not mean adding an independent data layer to the state system. It means designing institutional interfaces that match commune-level governance responsibilities with proportionate rights, services, capabilities, and controls. RDAF provides a structure for identifying these interfaces by function. The goal of data-driven governance is not for a commune-level government to have “more data,” but for the right data to reach the right actor, with the appropriate rights and purposes, through mechanisms that support feedback, control, and accountability.

6.5. General implications

The policy directions above reinforce that improving commune-level development data governance is not about creating another independent data tier. The central task is to design institutional interfaces through which governance responsibilities are accompanied by proportionate data rights, services, capabilities, and controls.

CDDG can therefore be understood as a governance domain within the national data and digital-government architecture, in which commune-level authorities both generate and verify some data through implementation and use authoritative data from other systems to perform territorial governance responsibilities. RDAF specifies these relationships by function rather than assuming that decentralizing governance must be accompanied by decentralizing data ownership.

This also distinguishes data-driven governance from administrative digitization. Digitization may enable data to be entered, stored, and transmitted more quickly; data-driven governance requires the right data to reach the right actor, with appropriate rights and purposes, through mechanisms that enable control, feedback, and accountability. Alignment between the architecture of responsibility and the architecture of data is therefore a central institutional issue in commune-level development governance under digital government.

7. Conclusion

This article begins from an institutional issue arising in the development of digital government and national data systems in Viet Nam: commune-level development-governance responsibilities must be considered in relation to the data conditions that enable those responsibilities to be performed. The analysis shows that the current legal and policy framework has established important foundations for data creation, governance, connection, and sharing; however, the links between commune-level governance responsibilities and data needs, data rights, operational mechanisms, data-use capacity, and governance purposes still require further specification in institutional design.

Based on theoretical synthesis and institutional analysis, the article proposes two complementary concepts: Commune-Level Development Data Governance (CDDG) and the Responsibility-Data Alignment Framework (RDAF). CDDG defines the institutional domain in which commune-level authorities participate in the data lifecycle and use data for development governance; RDAF provides a structure for analyzing alignment between governance responsibilities and corresponding data conditions. This approach shifts attention from whether commune-level government needs “more data” to which data

are needed, with which rights, for which responsibilities, through which mechanisms, and for what public-value purposes.

The findings suggest that improving commune-level development data governance requires clearer links between functions and data rights; effective verification, feedback, and correction mechanisms; two-way data flows; the conversion of sectoral data into information usable for territorial governance; and the linkage of data rights to data-use capacity, security, and accountability. This direction does not require an independent commune-level data tier; rather, it positions commune-level government within the national data and digital-government architecture with rights, services, and responsibilities defined by function.

The study is limited by its reliance on documentary and institutional analysis while not measuring actual implementation in localities. The identified gaps are therefore institutional-design gaps or matters that require further specification, not evidence of the same level of deficiency in every commune, ward, or special zone. Future research can test and develop RDAF through case studies, interviews, and operational data to assess the degree of alignment between governance responsibilities and data conditions in specific sectors and localities.

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