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Bearing Witness for Data: Digital Government Legibility and the Production Mechanism of Evidentiary Costs at the Grassroots Level

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Abstract: *Digital government has cut the procedural costs borne by citizens without lightening the burden at the grassroots implementation level. Existing studies attribute this gap to insufficient technological embeddedness, excessive systemic pressure, or the strategic misconduct of implementers, and so share an implicit corollary: once conditions improve, the burden should recede. Experience suggests otherwise: the more complete the system, the finer-grained the corroborating evidence it demands. This paper argues that the persistence of the burden stems from the way digitalization redefines "completion". To be read by the system, governance must first be made legible; and once fields become the main channel through which higher levels read the grassroots, the implementing end must continuously produce verifiability. This paper defines such labor as a subcategory of compliance costs at the grassroots implementation level (the implementing end)—the evidentiary burden—and distinguishes it from the three established cost categories by three displacements: bearer, timing, and termination condition. Coding sixteen clauses drawn from two operational policy texts, the paper identifies three mechanisms—translation, traceability, and verification—and argues that burden-reduction policies act on the carrier while the burden is generated in the mode of reading. Four boundary conditions are specified.*

Keywords: *Digital Government; Legibility; Evidentiary Burden; Administrative Burden; Grassroots Governance*

1. Introduction

Rectifying formalism to reduce the burden on the grassroots has repeatedly been designated a special campaign, and clearing government applications, abolishing rankings and circulated notices, and consolidating reporting templates have become standard practice. These measures share one judgment: the burden on the grassroots comes mainly from digital carriers, so fewer carriers should mean a lighter burden.

Frontline experience does not support this inference: the time freed by cleared applications is often filled by new verification and corroboration. The carriers have changed; what must be proven has not.

This is not unique to China. Peeters shows that digital interfaces reorganize interaction into operations the system can recognize, so that the burden does not vanish but changes position [1]; de Boer and Raaphorst find that automation compresses frontline judgment into a few nodes [2]; Rey et al. show that burdens travel along organizational cleavages and settle where bargaining power is weakest [3].

This paper's explanation is as follows: to be read by the system, governance must first be made legible—translated into discrete, comparable, and additive fields. Once fields become the main channel through which higher levels read the grassroots, the implementing end must continuously produce verifiability. This labor is the evidentiary burden, a subcategory of compliance costs at the implementing end: it adds no new cost category, but results from the simultaneous displacement of bearer, timing, and termination condition.

2. Literature Review: Three Explanatory Approaches and Their Shared Premise

Early Chinese scholarship treated the burden as a transitional cost that would fade as systems matured [11-15]; over the past decade it has turned to asking why the burden persists.

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2.1 The technological-conditions approach

This approach holds that the burden arises from a mismatch between systems and institutions, data, and personnel [17]: Lian Hongping and Zou Jiaxiu note that without institutional support systems become online façades and devolve into a grassroots burden [4]; Cao Yinshan and Liu Yiqiang explain involution through technological fit [5]. Yet as government cloud consolidation and data sharing advanced, corroborating materials became finer-grained structured data instead.

2.2 The systemic-pressure approach

This approach treats digitalization as an instrument for transmitting pressure: Zhang Jingtang and Rui Guoqiang argue that digital formalism is assessment pressure reappearing on a new carrier [7]; Zhao Ji and Qiu Hongyu identify four types of pressure that accumulate and resonate into a nested pressurization network [6]. It explains why the burden concentrates downward and rebounds, but not why pressure takes the form of proof rather than of added tasks [18].

2.3 The actor-strategy approach

This approach attributes the burden to implementers' coping: Dong Shitao and Dong Xiufang summarize the accumulation of deviations as "patchwork coping" [8], and Xu Gang argues that when rules are perceived as unfair, formal compliance becomes the rational choice [9]. But Meyer and Rowan show that the separation of formal structure from actual operations is how organizations adapt to conflicting demands [19]; that actors with different motives cope in isomorphic ways suggests that strategy is a response to structure.

2.4 The shared premise and this paper's point of entry

All three approaches presuppose a baseline state without burden. They overlook how digitalization redefines "completion": in paper-based administration, completion means the matter has in fact been handled; in digital administration, completion means the matter appears in the system in a readable state. Readability thus becomes part of completion, and the labor that produces it lies outside existing frameworks (Table 1, Figure 1).

Table 1 Comparison of the three explanatory approaches

Explanatory approach	**Source of the burden**	**Main contribution**	**Unexplained phenomenon**
Technological conditions	Mismatch between technology and institutions, data, and personnel	Explains regional variation and technological failure	Improved conditions coexist with a finer-grained burden
Systemic pressure	Pressure transmission and tightened accountability	Explains the downward concentration and rebound of the burden	Why pressure takes the form of proof
Actor strategy	Implementers' patchwork and improvisation	Explains the micro-genesis of deviation	Isomorphic behavior across differently motivated actors

3. Conceptual Definition and Theoretical Framework

3.1 Legibility: from the state's gaze to the system's gaze

Scott argues that to govern effectively the state must first simplify complex, situated social facts into categories readable from the center—legibility—and that its product is an abridged map [10]. Digital government carries the same logic inside the bureaucracy: to read, compare, and assess the grassroots, administrative systems must likewise translate practice into fields. Once classificatory systems stabilize they recede into the background [20], while commensuration dissolves prior relations [21].

This move alters an implicit premise: Scott's legibility has the state as agent and society as bearer, whereas inside the bureaucracy both sit on the state's side, with the higher level as agent and the lower

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level as bearer. Legibility thus becomes not only "how the state sees society" but "how the organization sees itself."

This paper defines legibility as the ongoing translation of situated governance practice into discrete fields that can be read at a distance, compared, and aggregated. It is a process rather than an outcome; its direction is set by the reader; its cost is not the loss of information as such but the fact that what is lost must be made up by implementers. Its operations are fielding, standardization, and commensuration.

3.2 The evidentiary burden: a subcategory of compliance costs at the implementing end

Herd and Moynihan decompose administrative burden into learning costs, compliance costs, and psychological costs [22,23]. This paper does not claim a new, parallel fourth cost: compliance costs already include the labor of submitting materials and completing procedures [22]. What is proposed is a subcategory of compliance costs at the grassroots implementation level (the implementing end)—the evidentiary burden: the time, attention, and emotional labor expended so that fields already reported are believed to be true by the reader. The time-measurable portion is the evidentiary cost (Table 2).

The reason for a separate name lies not in a different category but in three displacements occurring at once: the bearer shifts from applicant to caseworker; the timing shifts from during processing to after processing; the termination condition shifts from completion of submission to the reader's belief. Bearer is the primary criterion, because reducing materials lowers only the applicant's burden and leaves the caseworker's evidentiary requirement unchanged.

This burden is bound up with changes in bureaucratic form: street-level bureaucracy centers on case discretion [25], whereas information technology shifts bureaucratic organization toward the system level and frontline work toward checking outputs [26,30], so that trust comes to depend on the verifiability of data [27,28].

Table 2 Distinguishing the three cost categories from the evidentiary burden

Category	**Bearer**	**Termination condition**	**Change after digitalization**
Learning costs	Applicant or caseworker	Understanding the rules and the operations	Declines as interfaces become friendlier
Compliance costs	Applicant or caseworker	Submission completed as required	Partly declines after going online
Psychological costs	Individual	May persist after the matter ends	Not necessarily declining
Evidentiary burden	Implementing end	Belief by the reader	Rises as verification capacity grows

3.3 Three mechanisms: translation, traceability, and verification

Translation turns practice into fields; traceability turns fields into corroboration; verification turns corroboration into data that can be compared. Translation necessarily produces a residue that cannot be encoded; traceability shifts work from "getting it done" to "being seen to have done it"; failed verification triggers supplementary proof, which in turn generates new traces.

3.4 Three propositions and their falsification conditions

Proposition 1, carrier substitution: digitalization does not automatically lower evidentiary costs; it only changes their carrier. Falsification condition: if, with the mode of reading unchanged, clearing carriers significantly reduces the time spent producing corroboration and preparing explanations, Proposition 1 fails.

Proposition 2, reading distance: evidentiary costs rise with the composite of the number of levels, the degree of information asymmetry, and the frequency of reading; if this holds, corroboration requirements for cross-level reporting should exceed those for same-level filing. Falsification condition: if corroboration requirements toward a distant superior are lower than those toward a proximate one, Proposition 2 fails.

Proposition 3, collection credibility: where fields are generated by the system and the data source is trusted, evidentiary costs approach zero; where the data source is not trusted, automated collection merely

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moves the cost forward to error correction. Falsification condition: if automated collection is introduced under a questionable data source and costs still fall significantly, Proposition 3 fails.

Together the three propositions indicate that evidentiary costs depend on the mode of reading rather than on the degree of technological sophistication (Figure 2).

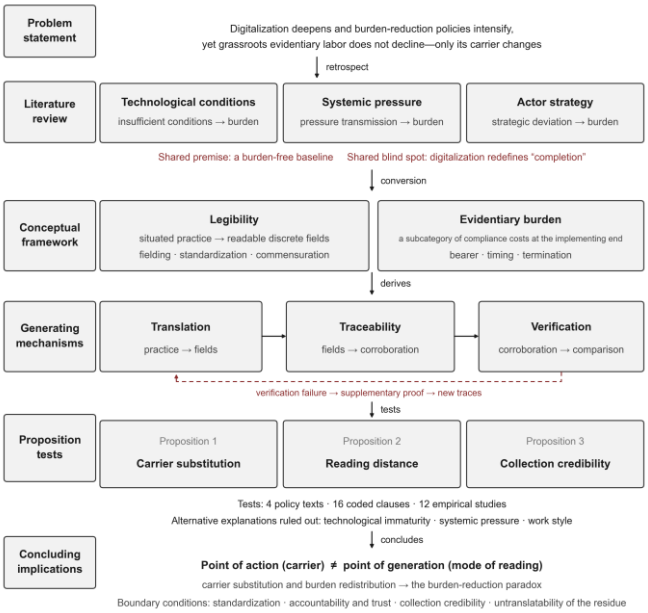


Figure 1 Main research framework of the paper

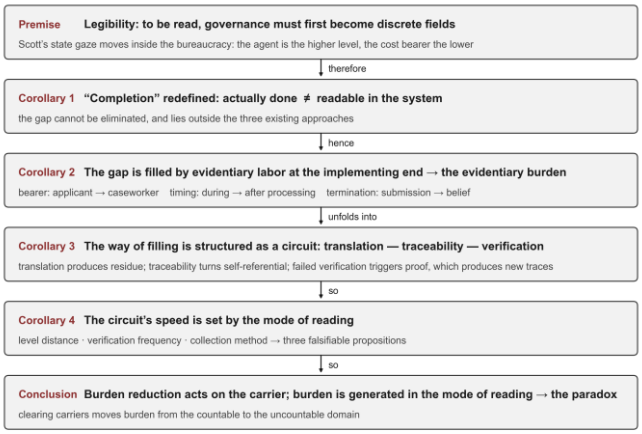


Figure 2 The internal logic of the theory

4. Materials, Analytical Steps, and the Boundaries of the Conclusions

4.1 Sources of materials

This is a mechanism-explaining study; materials are selected for mechanism identification rather than sample representativeness. Four policy texts are used: the Overall Layout Plan for the Construction of a Digital China, the Several Provisions on Rectifying Formalism to Reduce the Burden on the Grassroots, the State Council's guiding opinions on "efficiently completing one matter," and the Opinions on Strengthening the Modernization of the Grassroots Governance System and Governance Capacity. Publicly reported typical problems indicate only the form of the phenomenon. Twelve published empirical and case studies are used [1-9,16,18,26,29].

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4.2 Selection criteria and analytical steps

Materials are included only if they are simultaneously mechanism-relevant (containing descriptions of fields, corroboration, or verification), identifiable (allowing specific reporting items or comparison methods to be discerned), and source-verifiable. Analysis proceeds in four coding steps: field requirements; collection methods, which determine whether evidentiary labor is moved forward; corroboration requirements, which point either to process or to outcome; and verification methods, with subject and frequency. The two operational texts were read clause by clause and every passage bearing on the four categories was excerpted, yielding sixteen clauses: three on fields, four on collection, three on corroboration, and six on verification. Table 3 presents six representative clauses;

Table 3 Reporting, corroboration, and verification requirements in the policy texts (selected)

Text and clause	Excerpt from the original	Classification
Guofa [2024] No. 3, Art. 9	Materials issued by government departments are exempt from submission; matters verifiable through data sharing are exempt from supporting materials	Verification: the verification duty shifts to the processing side
Guofa [2024] No. 3, Art. 9	Compile data standards of one file per enterprise and one file per person; promote one data source and one standard	Fields: unified definitions and standardization
Guofa [2024] No. 3, Art. 7	Strengthen data aggregation, sharing, and big-data analysis in support of gradually realizing benefits without application	Collection: automatically generated by the system
Burden-Reduction Provisions, Art. 8	Do not use meetings held, documents issued, photographed traces, or study notes as criteria for judging the quality of work	Verification: directly addresses the mode of reading
Burden-Reduction Provisions, Art. 12	Data materials that can be generated automatically by the system or obtained through sharing shall no longer be required from the grassroots; the same material shall be reported at most once	Collection: eliminating duplicate declaration
Burden-Reduction Provisions, Arts. 13–14	No mandatory functions such as clocking in, points ranking, or statistics on online time; work photographs, videos, and trajectories shall not be required unless necessary	Corroboration: limiting mandatory trace-keeping

Note: Clause numbers follow the numbering of the texts themselves; excerpts are abridged. Sources: Guofa [2024] No. 3; Several Provisions on Rectifying Formalism to Reduce the Burden on the Grassroots (2024).

Table 3 shows two things: the policy texts are not short of interventions in the mode of reading—Article 8 rejects judging work by traces, and Article 12 requires the elimination of duplicate reporting—yet provisions on what is reported remain centered on fields and corroboration. The problem lies not in policy awareness but in executable form.

4.3 Evidence grading and the boundaries of the conclusions

Evidence is graded in three tiers: policy texts establish institutional requirements; peer-reviewed research establishes the presence of the mechanism in experience; media accounts indicate only publicity. Judgments rest mainly on the first two (Table 4). The conclusions have three boundaries: they argue mechanism without estimating magnitude; they apply only to matters that require reading by higher levels; and they describe only the current form under existing platforms and assessment systems. The paper uses "benefits without application" and automated decision systems as counterexamples to test Proposition 3 and the judgment that "the more advanced the technology, the lower the burden." Its limitation is the absence of first-hand interviews; time measurement relies on textual inference.

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Table 4 Test design for the three propositions

Proposition	Observable indicator	Available materials	Criterion of support
Carrier substitution	Corroboration hours per unit of business (minutes/case)	Post records before and after clearance in the same locality	Hours do not decline significantly after clearance
Reading distance	Number of reported items (items/case)	Service guides for comparable matters at the provincial and municipal levels	The more distant the level, the greater the number of items
Collection credibility	Frequency of supplementary proof (times/case)	Process records for both benefits-without-application and self-declaration	Declaration decreases while supplementary proof does not

5. Evidentiary Burden Generation: Translation, Traceability and Verification

5.1 The residue of translation

The first step of legibility is turning practice into fields, accomplished through three cuts: time is cut into nodes, subjects into categories, and outcomes into states. What remains after the cuts is what will not fit into fields: a household's actual hardship depends on the combination of debt, kin support, and contingent events; the ins and outs of a dispute depend on historical relationships and emotional turning points. Bowker and Star call such objects residuals, and note that the residual is not a failure of classification but the condition of its operation [20].

The system leaves a remarks box for the residue, but remarks are not comparable: ranking by higher levels must use fields that every unit possesses, so residue written into remarks is equivalent to non-existence in assessment. Implementers either translate the residue into a readable standard formulation or leave it outside the system; the former is a translation cost, the latter a concealment cost.

5.2 The self-reference of traceability

The second step of legibility is turning fields into corroboration. Corroboration extends from signatures and seals to timestamps, geolocation, on-site photographs, and process logs, and its nature changes accordingly: it no longer proves that the matter was accomplished but that it was processed. When proof becomes the main basis of assessment, the rational choice is to break work into more traceable nodes; the more nodes there are, the larger the checkable surface and the lower the probability of being found incomplete.

5.3 The accumulation of verification

The third step of legibility is turning corroboration into comparable data. Verification takes three forms: intra-system verification checks whether materials are internally consistent—lowest in cost, but able to detect only formal errors; cross-system verification checks whether data from different systems agree—most powerful, but premised on consistent definitions; manual verification is the costliest, yet best at detecting substantive problems.

Failed verification triggers supplementary proof, whose cost often far exceeds that of initial reporting: a single inconsistency sets off review of an entire data chain, requiring both correction of the error and explanation of its cause. Baekgaard et al. note that burden also depends on how rules are communicated, and that vague or frequently changing rules force both sides into repeated confirmation [24]. This can be read here as: the more unstable the verification standard, the higher the frequency of supplementary proof; and when verification becomes real-time, evidentiary costs become a continuous expenditure.

5.4 The synthesis of the three mechanisms

Figure 3 links the three mechanisms into a closed loop: translation produces fields, traceability produces corroboration, verification produces comparison, and failure returns to translation. The three multiply rather than add: if any one of them approaches zero, evidentiary costs fall markedly.

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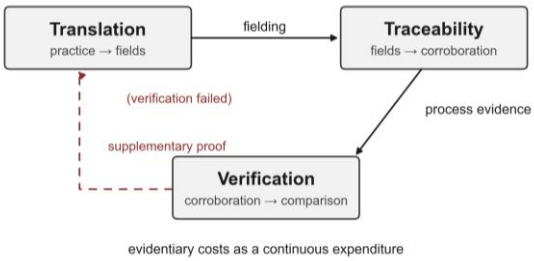


Figure 3 The production circuit of evidentiary costs

6. Carrier Substitution and the Redistribution of Burden

6.1 Burden-reduction reform targets the carrier

Most recent burden-reduction measures target countable carriers: clearing applications, abolishing rankings, and consolidating reports all reduce countable objects and are therefore assessable. The problem is that they change the physical form of proof, not its social relations: after applications are cleared, clocking in moves into work group chats. The carrier changes; the requirement to be believed does not.

This process may be called carrier substitution, and it has two consequences. First, the visibility of burden declines: burden moves from the countable to the uncountable domain. Second, its form becomes finer-grained: since clocking in through an application is no longer available, screenshots and group replies take over, and the labor of producing semi-structured traces increases instead.

6.2 The transfer of the burden of proof

Burden redistribution refers to the transfer of the same evidentiary requirement between subjects, not to a change in total volume. Carrier substitution is only half of it; the other half occurs between government and citizen: integrated government services let citizens make fewer trips and submit fewer materials, and on the citizen side all three cost categories decline [11,31,32].

But the burden of proof does not disappear; it is transferred: citizens no longer need to provide proof, and the government must instead verify the authenticity of information, most of that verification falling to the grassroots implementing end. One material a citizen no longer submits often becomes one more phone call and one more site visit for the implementing end. Rey et al. note that burden settles where bargaining power is weakest [3], and that position is usually the grassroots implementing end: it absorbs the verification requirements of higher levels and the evidentiary demands of citizens, yet can refuse neither.

6.3 Existing Constraints and Their Non-necessary Translation into Burden Reduction

If burden is determined by the mode of reading, why do policies that already impose constraints still land on carriers? First, the measurability of carriers: clearing applications and merging reports have clear counting units and can yield short-term results, whereas changing the mode of reading is hard to count [34]—asking for one less piece of corroboration equals relinquishing verification capacity. Second, the traceability of responsibility: clearing carriers does not change the structure of responsibility, whereas changing the mode of reading requires higher levels to evaluate lower levels on results and professional judgment and to answer for misjudgment.

7. Boundary Conditions and Alternative Explanations

7.1 Conditions under which evidentiary costs decline

Propositions 1 and 2 describe general tendencies, but tendencies have boundaries, and four conditions determine the level of evidentiary costs. First, the degree of standardization of the matter: where rules are clear, fields suffice to contain practice and the residue is small; dispute mediation and the like leave discretion, so the residue is large, and local knowledge in rural governance is especially hard to contain

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[33]. Second, the intensity of accountability and the level of trust: where accountability is weak and trust stable, higher levels can accept oral reports; where accountability is strong and trust insufficient, traces become a means of exoneration—accountability is meant to constrain dereliction, yet it rewards trace-keeping. Third, the credibility of the collection method: where the data source is trusted, evidentiary costs approach zero, and what "benefits without application" abolishes is not the form but the step in which "the assessed party states its own case." Fourth, the degree of untranslatability of the residue: income and housing area can be translated into standard formulations, whereas the tension in family relations is necessarily lost and can be handled only through exception channels (Table 5).

Table 5 Boundary conditions of the evidentiary burden

Condition	Mechanism	Expected evidentiary cost
Highly standardized matter	Fields suffice to contain practice	Low
Poorly standardized matter	Large residue, requiring repeated translation	High
Low accountability, stable trust	No need for defensive trace-keeping	Low
High accountability, insufficient trust	Traces become a means of exoneration	High
Automated collection with a trusted data source	Eliminates the step of self-statement	Approaches zero
Automated collection with a questionable data source	Proof moves forward to data correction	Medium to high

7.2 Ruling out alternative explanations

The first is the technological-immaturity thesis, which predicts that burden will gradually decline as system integration advances. But corroboration requirements became finer as integration increased; technological progress raises verification capacity, and greater verification capacity raises precisely the threshold for being believed. The second is the systemic-pressure thesis, which can explain why burden concentrates downward and rebounds but not why pressure takes the form of proof: digitalization supplies low-cost, real-time checkable means, making proof the most economical expression of pressure.

The third is the work-style thesis, which attributes burden to a formalism of conduct and implies that educating cadres and correcting attitudes would solve it, yet cannot explain isomorphism across regions: implementers in different regions, with different leadership styles and motives, display highly similar ways of keeping traces in digital governance. Isomorphism suggests that behavior is a response to institutional requirements rather than an overflow of individual character; Meyer and Rowan's concept of decoupling explains this better than a critique of work style [19]. All three explanations omit the same link: digitalization's redefinition of "completion."

8. Conclusion

As digitalization deepens and burden-reduction policies intensify, the labor the grassroots devotes to proving its work has not decreased; it has only changed form.

First, the persistence of burden stems from digitalization's redefinition of "completion": in paper-based administration, completion means the matter has in fact been handled; in digital administration, completion means the matter can be read in the system. The two are not equivalent, and the difference must be made up by the implementing end through producing verifiability. The evidentiary burden is therefore a subcategory of compliance costs at the implementing end; it is oriented toward the reader rather than the rules, does not decline as rules become clearer, and rises as verification capacity grows.

Second, evidentiary costs are produced by three mechanisms—translation, traceability, and verification—which form a circuit rather than stages: translation produces an unclassifiable residue, traceability shifts work from "getting it done" to "being seen to have done it," failed verification triggers supplementary proof, and supplementary proof generates new traces. The speed of the circuit is set by the frequency of verification, its scale by the granularity of traces, and its starting point by the size of the residue.

Third, the limited effect of burden-reduction policy stems from a mismatch between the point of action and the point of generation: the effort targets the carrier, while generation lies in the mode of

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reading. As long as higher levels can read the grassroots only through limited fields, evidentiary labor will reappear in new forms; carrier substitution moves burden into the uncountable domain, so results show on paper while gains in time remain limited.

The theoretical contribution is threefold: it relocates the evidentiary burden of the implementing end, showing that the main producer of burden is not rule complexity but the requirement of verifiability; it moves the legibility thesis from state–society relations into the bureaucracy [10]; and it offers a mechanism-based explanation of the burden-reduction paradox—even with appropriate technology and reasonable assessment, evidentiary requirements regenerate as long as the mode of reading is unchanged.

This paper does not claim that burden-reduction policy has failed overall, but that, with the mode of reading unchanged, clearing carriers is insufficient to eliminate evidentiary requirements. The practical implication is to change how data are collected, reused, and evaluated: from declaration to system generation, from single collection to multi-party reuse, and from process traces to outcomes.

There are three limitations: no first-hand interviews, so the paper can demonstrate the existence of the mechanism but not estimate its scale; no cross-regional system comparison; and no discussion of differences across levels and departments.

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