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IMPROVING THE INSTITUTION OF APPEALS: TIME LIMITS, RESPONSE QUALITY, AND MONITORING

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Abstract. *The subject of the study is the procedural regulation of appeals of individuals and legal entities in the Republic of Uzbekistan. The topic is relevant because the technological infrastructure for handling appeals is being modernized through a unified digital platform, whereas the substantive procedural rules have remained essentially unchanged since 2017, so that faster document flow does not by itself improve the outcome. The purpose is to identify the gaps in the current regulation and to justify specific legislative amendments. The work relies on comparative legal, formal legal and systemic structural methods and examines the legislation and practice of Kazakhstan, the Republic of Korea, Germany, and Singapore. Four interrelated gaps were established: uniform periods of consideration combined with evaluative grounds for their extension; the absence of normative criteria of a proper answer; the departmental and closed character of supervision; and the absence of a special procedural regime for appeals concerning medical services. On this basis a new wording of Article 28 and three new articles are justified. The results may be used in lawmaking, in the practice of state bodies and in further research. The proposals are designed to operate largely within existing institutional and digital infrastructure and are intended to minimize additional budgetary expenditure.*

Keywords: *administrative procedure, citizens' appeals, procedural time limits, response quality, open monitoring, anti-corruption, medical care quality*

Introduction

The right to submit appeals is a fundamental constitutional right enshrined in Article 40 of the Constitution of the Republic of Uzbekistan. It provides that everyone, individually or jointly with others, has the right to submit applications, proposals, and complaints to state bodies and organizations, citizens' self-government bodies, officials, and people's representatives, and that such appeals must be considered in accordance with the procedure and within the time limits established by law (Constitution of the Republic of Uzbekistan, 2023). It is of fundamental importance that the constitutional provision refers to periods of consideration directly: timeliness is not a matter of organizational convenience but an element of the content of the constitutional right itself.

The procedure for the exercise of this right is determined by the Law "On Appeals of Individuals and Legal Entities" (Law No. LRU-445, 2017). The Law is built upon a single procedural model: identical periods, an identical sequence of actions and identical requirements as to the result are established for all categories of appeals. Such uniformity was justified at the stage of the formation of the institution, when the principal task was the ordering of work with appeals as such and the overcoming of divergent departmental practices.

Over the intervening years the Law has been consistently modernized. In 2020 it was supplemented by Article 24¹, which established the particularities of the consideration of appeals of minors (Law No. LRU-608, 2020); in May 2026 the notion of a "helpline" was introduced into it and the possibility of organizing call centres within state bodies was consolidated (Law No. LRU-1144, 2026). The procedural core, however – the system of periods, the requirements as to the content of the answer and the model of control – has remained practically unchanged since 2017.

Meanwhile, the environment in which this institution operates is changing fundamentally. The Address to the Oliy Majlis and the people of Uzbekistan of 26 December 2025 determined that from 2026 the "Electronic Government" platform is to be renewed radically: the services, functions and information systems of state departments are being integrated into a Unified Digital Platform, while the distribution of incoming appeals among executors and the control of the periods of their consideration are to be carried out by means of artificial intelligence (President of the Republic of Uzbekistan, 2025). At the same time 2026 has been declared a year of emergency measures in the fight against corruption, and positions of officers responsible for compliance and internal anti-corruption control are being introduced in all departments.

It is precisely at this point that the principal contradiction is revealed. The technological and institutional basis of work with appeals is being renewed, whereas the norms which substantively determine this work remain unchanged. A digital platform that automates the existing procedural rules increases the speed of document flow but does not in itself affect the quality of consideration: it will equally accelerate the movement of an answer that does not answer the question raised. It follows that digitalization must be accompanied by a substantive correction of the procedural norms rather than replace them.

The purpose of the article is to identify the systemic gaps in the procedural regulation of the consideration of appeals of individuals and legal entities in the Republic of Uzbekistan and to justify specific proposals for the introduction of amendments and additions to the Law "On Appeals of Individuals and Legal Entities."

The achievement of this purpose presupposes the solution of four tasks: to assess the existing system of procedural periods and the grounds for their extension; to determine the normative criteria of a proper answer to an appeal and the procedural consequences of the failure to observe them; to justify a model of open monitoring and public accountability

in work with appeals; and to justify a special procedural regime for appeals connected with the provision of medical services.

In the legal orders examined in the present article, the problem of the procedural regulation of appeals is solved by different means, and the authors of the corresponding solutions proceed from different methodological premises.

The legislation of the Republic of Kazakhstan follows the path of the codification of administrative procedures and of the strict normative limitation of the grounds for extending the periods of consideration, combining the procedural norm with a rule on the liability of the official who takes the decision to extend (Administrative Procedural Code of the Republic of Kazakhstan, 2020). The reception of appeals and the tracking of their consideration are organized through a single national platform (e-Otinish, n.d.).

The legislation of the Republic of Korea refers to the determination of the periods and of the procedure for the consideration of particular categories of appeals to subordinate regulation and concentrates the analysis of the whole array of appeals in a specialized anti-corruption body; that is, it treats appeals not only as an instrument for the restoration of individual rights but also as an analytical source (Civil Petitions Treatment Act, n.d.; Anti-Corruption and Civil Rights Commission of the Republic of Korea, n.d.; e-People, n.d.).

German law approaches the same problem from the side of judicial protection: the failure of the administration to act within a reasonable period is treated as an independent violation of subjective rights and opens direct access to the administrative court (Verwaltungsgerichtsordnung, n.d.). The practice of the Republic of Singapore, finally, demonstrates a non-normative, organizational approach, in which the periods are established by service quality standards rather than by law, and the principal mechanism is the informing of the applicant about the course of consideration (OneService, n.d.).

In domestic doctrine the questions of the legal regulation of particular spheres of relations and of the sources of such regulation have been examined, in particular, by Achilova (2023a, 2023b). The approaches set out above are heterogeneous: some of them are normative and others organizational, which makes it necessary to determine which of them may be received into the legal system of Uzbekistan and in what form. This determines the direction of the present research.

Methods

The research was carried out in four stages.

At the first stage the current national regulation was examined: Article 40 of the Constitution of the Republic of Uzbekistan (2023); Articles 3, 24¹, 25, 27, 28, 34 and 35 of the Law “On appeals of individuals and legal entities” (Law No. LRU-445, 2017); Article 43 of the Code of the Republic of Uzbekistan on Administrative Responsibility (1994); Article 985 of the Civil Code of the Republic of Uzbekistan (1996); and the subordinate acts adopted in this sphere (Resolution of the Cabinet of Ministers No. 341, 2018).

At the second stage the dynamics of the development of the Law from 2017 to 2026 were traced, with the establishment of which of its elements were subjected to modernization and which remained unchanged (Law No. LRU-608, 2020; Law No. LRU-1144, 2026), and these data were correlated with the programme documents determining the digital transformation of public administration (President of the Republic of Uzbekistan, 2025).

At the third stage a comparative legal analysis of four foreign legal orders was carried out: the Republic of Kazakhstan, the Republic of Korea, the Federal Republic of Germany and the Republic of Singapore. For each of them the model of the periods of consideration, the grounds for their extension, the consequences of their violation and the organizational instruments of control were established.

At the fourth stage the official materials of the Anti-Corruption Agency of the Republic of Uzbekistan concerning the implementation of the “Sector without Corruption” project in the system of the Ministry of Health were analysed (Decree No. UP-6110, 2020; Anti-Corruption Agency of the Republic of Uzbekistan, 2021), and on the basis of the whole body of data obtained the wording of the proposed norms was formulated.

The comparative legal method constitutes the basis of the work, since the task consists not in describing the national regulation but in establishing which of the solutions tested in other legal orders are applicable in the conditions of Uzbekistan. The selection of the objects of comparison is justified as follows. The Republic of Kazakhstan is the legal order closest to Uzbekistan in legal tradition and administrative practice, which makes its experience the most suitable for reception. The Republic of Korea was selected as an example of the normative differentiation of periods combined with a single national platform and with the use of the array of appeals for anti-corruption purposes. The Federal Republic of Germany was included because German law answers the question of the consequences of a violation of procedural periods, which is not resolved in the national legislation. The Republic of Singapore was included as an example of an organizational rather than a normative model, that is, as a counter-example allowing the limits of legislative regulation to be determined.

The formal legal method was applied in the analysis of the texts of the normative acts, in the identification of evaluative and blanket formulations and in the drafting of the proposed wordings. The systemic structural method made it possible to establish the interconnections between the identified gaps and to demonstrate that the proposed norms operate only as a single set. The method of legal modelling was used in the formulation of the concrete wordings of the articles proposed for introduction into the Law.

The object of the research is the totality of the relations arising in the course of the receipt, consideration and control of the consideration of appeals of individuals and legal entities. The subject of the research comprises the procedural norms determining the periods of consideration, the requirements as to the content of the answer, the monitoring of the work with appeals and the particularities of the consideration of individual categories of appeals.

Results

The dynamics of the development of the Law over the period from 2017 to 2026 show a pronounced imbalance. The changes introduced concerned either individual categories of subjects, as in the case of Article 24¹ on appeals of minors (Law No. LRU-608, 2020), or the organizational forms of the receipt of appeals, as in the case of the norms on the helpline and on call centres (Law No. LRU-1144, 2026). The three elements which determine the result of the consideration of an appeal - the system of periods, the requirements as to the content of the answer and the model of control - have not been revised. The analysis carried out makes it possible to identify four interconnected gaps in the current regulation.

Under Article 28 of the Law an application or a complaint is considered within a period of fifteen days and, where additional study and (or) verification or the requisition of additional documents is necessary, within a period of up to one month; beyond that the period may in exceptional cases be extended by the head of the body for one further month. The problem lies not in the possibility of extension as such, but in the fact that the content of the notion of “additional study” is not disclosed and no exhaustive list of the grounds for extension is established. An evaluative formulation converts an exceptional procedural mechanism into a convenient managerial instrument whose application is practically not amenable to external verification. To this is added the reverse side of the same problem: a simple request for information and a complaint requiring an on-site

inspection and an expert examination are considered within one and the same period, which does not permit a rational distribution of administrative resources.

By virtue of part four of Article 27 of the Law an appeal is deemed to have been considered if all the questions raised in it have been resolved and a corresponding answer has been sent to the applicant; part five requires that the answer contain concrete grounds refuting or confirming the arguments advanced, with references to the norms of legislation. The requirement is formulated correctly, but the Law defines neither the criteria of the completeness and reasoned character of the answer nor the procedural consequences of the failure to observe them. As a result, an answer which has not assessed the applicant's arguments and contains no conclusions on the merits is formally counted as compliance with the Law.

The problem is aggravated by the fact that the elements of an administrative offence in this sphere already exist. Article 43 of the Code of the Republic of Uzbekistan on Administrative Responsibility (1994) provides for a fine on officials for the unlawful refusal to receive and consider appeals, for the violation of the periods of their consideration without valid reasons, for the failure to send an answer, for the adoption of a decision contrary to the legislation on appeals and for the failure to ensure the restoration of violated rights. The norm, however, is blanket in character: nowhere does the Law define which reasons for extension are to be regarded as valid and which answer is to be recognized as proper. Liability is formally established but is practically difficult to apply.

Under Article 34 of the Law, the monitoring of the consideration of appeals is carried out by the head of the state body himself in relation to his own structural subdivisions, while Article 35 provides for a quarterly generalization and analysis of appeals with the placement of the corresponding reports on official websites. Elements of openness are therefore present in the Law. Moreover, a system of assessment already exists at the subordinate level: Resolution of the Cabinet of Ministers No. 341 of 7 May 2018 approved the Model Regulation on the procedure for work with appeals and the Regulation on the assessment and categorization of the activity of state bodies, state institutions and their officials in work with appeals, the title of that Resolution having been set out in a new wording by Resolution of the Cabinet of Ministers No. 40 of 30 January 2026 (Resolution of the Cabinet of Ministers No. 341, 2018).

This assessment, however, is of a departmental character, its results are not made public and its criteria are not consolidated at the level of a law. The composition of the published information is not unified: comparable indicators are absent – the proportion of cases considered in violation of the periods, the frequency of extensions, the satisfaction rate, the proportion of repeat appeals – and no mechanism is provided for the use of such indicators in the taking of managerial decisions. The notion of a repeat appeal is defined in Article 3 of the Law, but it is not used as an indicator of systemic shortcomings.

The fourth gap is of a sectoral character. At present appeals in the sphere of the provision of medical services are considered under the general procedure, alongside all other applications and complaints. Meanwhile the object of legal protection here is human life and health, and an untimely reaction or the formal character of a verification may lead to the loss of evidence, to the deterioration of the patient's condition and, in individual cases, to irreversible consequences. Part three of Article 25 of the Law prohibits the forwarding of an appeal to the bodies whose actions are being contested; the Law, however, contains no special guarantees of the independence of a verification for the medical sphere, establishes no obligation to involve an independent specialist and provides no procedure for furnishing the applicant with the conclusion of a departmental expert examination.

On the basis of the gaps identified, four legislative solutions have been formulated, each of which is addressed to a specific gap and is built into the existing architecture of the Law.

A new wording of Article 28 of the Law.

Appeals which do not require additional study and (or) verification, the requisition of additional documents or the conclusions of authorized bodies, including appeals for the provision of information, for the clarification of legislation and for the issue of official particulars, are to be considered within a period of seven days. For the remaining applications and complaints the period of fifteen days is retained. Extension is permitted on one of three grounds only - the necessity of an on-site inspection, the necessity of requisitioning documents and information from other state bodies, organizations or third persons, and the necessity of ordering an expert examination or of obtaining the conclusion of a specialist - and for no more than one month. Within three days from the day of the taking of the decision on extension a reasoned notification is to be sent to the applicant indicating the concrete ground, the procedural actions being performed and the date of the completion of the consideration.

The consequence of such a construction should be stated directly: the maximum aggregate period is reduced. Under the current wording, where additional study is present, the initial period alone amounts to up to one month and may be extended for a further month, that is, may in the aggregate reach two months; under the proposed wording the initial period equals fifteen days, while extension is limited to one month and is permitted only on a closed list of grounds. Where a verification or an expert examination is objectively necessary, an extension of one month is sufficient for a full and objective consideration, and a closed list of grounds ensures the predictability of the administrative procedure for the applicant.

A new Article 27¹ of the Law on the requirements as to the quality of the answer.

The answer must contain a reasoned conclusion on each question raised, a statement of the circumstances established and references to the norms applied. In the event of a full or partial refusal to satisfy the appeal, the body is obliged to set out the legal grounds of the decision taken and to explain the procedure for contesting it. The following are not to be recognized as proper consideration: answers which merely set out the norms of legislation or general rules without an examination of the arguments advanced; answers which contain no conclusions on the merits of the questions raised; and answers based on knowingly unreliable or unverified particulars without the conduct of the corresponding verification. Upon the establishment of such circumstances the appeal is to be recognized by the hierarchically superior body as having been considered improperly and is to be referred for repeat consideration, and the officials at fault are to be held liable. The proposed norm therefore creates no new liability but fills with content the liability which already exists under Article 43 of the Code on Administrative Responsibility (1994), thereby converting a blanket provision into an applicable one.

A new Article 34¹ of the Law on open monitoring and public accountability.

The maintenance of a single electronic system for the receipt, consideration and control of the execution of appeals is envisaged, enabling the applicant to track all stages of the consideration in real time. The authorized state body publishes quarterly, in open form and broken down by each body and organization, generalized indicators: the total number of appeals received, the proportion of those considered in violation of the periods, the number and proportion of cases of extension, the proportion of appeals satisfied, and the number and proportion of repeat appeals. The exceeding of the established threshold value of the proportion of repeat appeals on one and the same question becomes a ground for an unscheduled study of executive discipline and for an assessment of

the effectiveness of the activity of the corresponding subdivision. The results of the generalization and analysis of appeals are used for the identification of spheres and territories with heightened corruption risks and are submitted, in the established manner, to the authorized body in the sphere of combating corruption. The proposed norm does not abolish the existing mechanism of departmental assessment; it makes its results public and raises the system of indicators to the level of a law.

A new Article 24² of the Law on appeals in the sphere of medical services.

The establishment of a special procedural regime for a separate category of appeals is not a novelty for Uzbek legislation: such a regime has already been established by Article 24¹ of the Law for appeals of minors. The introduction of Article 24² corresponds fully to the established structure of the Law and continues that line. It is proposed that appeals connected with the quality, safety and timeliness of the provision of medical care be considered within a period of ten days, and that appeals containing particulars of an immediate threat to the life or health of a patient, or requiring urgent medical measures, be considered not later than within twenty-four hours, with the simultaneous adoption of measures to prevent harm; extension of these periods is not permitted. The forwarding of such appeals to the medical organization or medical worker whose actions are being contested is excluded, and the arguments set out are verified with the involvement of an independent specialist who did not participate in the provision of the medical care concerned. The authorized body maintains a single electronic register of appeals concerning the quality of medical care and publishes annually depersonalized statistical particulars on the categories of appeals, the results of verifications, the violations identified and the measures taken.

The connection between the administrative procedure and judicial protection deserves separate attention. It is proposed that the materials of the verification, including the conclusion of the departmental expert examination of the quality of the medical care provided, be furnished to the applicant in full, with the possibility of their use as evidence in the consideration of civil cases on the compensation of material damage and of moral harm. At the same time the satisfaction of the appeal by the authorized body or the application of measures of liability to the persons at fault does not restrict the patient's right to judicial protection and to the bringing of a claim for the compensation of harm in the manner established by Article 985 of the Civil Code of the Republic of Uzbekistan (1996). Such a solution links the pre-trial stage with civil law means of protection and reduces the procedural costs of the parties.

Effectiveness and reliability of the results

The reliability of the results is ensured by grounding each proposal in applicable national legislation and verifiable foreign legal experience. None of the proposed provisions requires the establishment of new state bodies or the introduction of procedures fundamentally unknown to the national legal system. The effectiveness of the proposals derives from their systemic and mutually reinforcing character. Reducing the time limits without establishing requirements for the quality of responses would risk increasing the number of formalistic decisions; introducing liability without objective digital monitoring would hinder the identification of violations; and open monitoring, in turn, cannot function effectively without uniform procedural standards. All four proposals are integrated into the existing structure of the Law: Article 24² continues the system of special procedural regimes begun by Article 24¹; Article 27¹ substantively supplements Article 27 on answers to appeals; the new wording of Article 28 preserves the very possibility of extension while limiting it to objective procedural necessity; and Article 34¹ forms the external and open component of the departmental monitoring provided for by Article 34.

The implementation of the proposed norms will not require additional expenditure from the state budget: the functions of the single electronic system are provided for within the capabilities of the Virtual Reception of the President of the Republic of Uzbekistan, of the Unified Portal of Interactive Public Services and of the Unified Digital Platform being introduced from 2026 (President of the Republic of Uzbekistan, 2025), while the electronic register of appeals concerning the quality of medical care is maintained on the basis of the acting information systems of the authorized body in the sphere of health care.

Discussion

The comparative material shows that the tasks formulated above are solved in various legal orders by fundamentally different means, and not all of these means are equally suitable for reception.

The experience of Kazakhstan is the closest to Uzbekistan in legal tradition and administrative practice. Article 76 of the Administrative Procedural Code establishes fifteen working days from the day of registration of an appeal; extension is possible only by a reasoned decision of the head of the administrative body, of his deputy or of the head of the apparatus, only where it is necessary to establish factual circumstances of significance for the case, for a reasonable period but not exceeding two months, and with compulsory notification of the participant in the procedure within three working days. It is essential that the person authorized to take the decision bears disciplinary and other liability for an unjustified extension of the period (Administrative Procedural Code of the Republic of Kazakhstan, 2020). The legislator went still further in respect of complaints: in the wording of the Law of 17 December 2025, Article 99 of the Code establishes a period of twenty working days for the consideration of a complaint and directly prohibits its extension save in the cases established by laws. The reception of appeals and the tracking of their consideration are effected through the single platform e-Otinish (n.d.).

The differentiation of periods according to the type of appeal is also normatively consolidated in the Republic of Korea, where the law on the treatment of civil petitions refers the determination of the periods and of the procedure for the consideration of separate categories of appeals to the subject-matter of a presidential decree (Civil Petitions Treatment Act, n.d.). The author supports precisely this approach: a differentiated period established by law, combined with an exhaustive list of the grounds for extension and with the personal liability of the official who takes the decision to extend.

A different model is demonstrated by Singapore, where the periods are established not by a law but by service quality standards: the OneService platform, with the assistance of artificial intelligence, independently forwards an appeal to the competent department or to the territorial council, the status of the appeal is visible to the applicant, and in complex cases requiring interdepartmental interaction the answer contains a description of the measures being taken and an indicative date of completion (OneService, n.d.). This experience is valuable as an organizational and not as a normative model, and for that reason cannot be mechanically transferred into the text of a law; the author therefore rejects its direct reception. Its significance lies elsewhere: the principal mechanism here is not the extension of the period but the informing of the applicant about the course of consideration. It is this element that has been received in the proposed wording of Article 28 in the form of a reasoned notification indicating the actions being performed and the date of completion.

German law shows what a violation of procedural periods ought to entail. Paragraph 75 of the Code of Administrative Court Procedure grants the interested person the right to apply directly to the administrative court where, without sufficient grounds, no decision has been taken on an application or complaint within a reasonable period; as a general

rule such a right arises upon the expiry of three months (Verwaltungsgerichtsordnung, n.d.). The subject-matter of the judicial proceedings is not the content of the administrative decision but the very inaction of the administration, that is, a violation of reasonable periods is qualified as an independent violation of subjective rights. This construction is not proposed for direct reception in the present article, since it presupposes a corresponding reorganization of administrative justice; it is significant, however, as an argument in favour of the proposition that the violation of a period is an independent legal fact and not a mere technical delay.

The Korean experience is particularly instructive here. The single platform e-People unites the systems of work with appeals of more than nine hundred central and local bodies and organizations, and it is maintained by the Anti-Corruption and Civil Rights Commission, which uses the analysis of incoming appeals for the early identification of systemic and corruption-related problems (e-People, n.d.; Anti-Corruption and Civil Rights Commission of the Republic of Korea, n.d.). The array of appeals thus serves not only as a means of restoring the rights of individual persons but also as a regular analytical source for anti-corruption policy. It is this function that is absent in the national regulation and that the proposed Article 34¹ is intended to introduce.

The significance of this sphere is confirmed by state policy. On the basis of the Decree of the President of the Republic of Uzbekistan of 12 October 2020, the implementation, jointly with the Ministry of Health, of the “Sector without Corruption” project was entrusted to the Anti-Corruption Agency (Decree No. UP-6110, 2020). According to the results of the study conducted by the Agency in the treatment and prophylactic institutions of the Andijan, Bukhara and Samarkand regions, systemic problems of the sector were noted: the absence of a procedure for the compulsory open publication of particulars of vacant posts, which generates corruption risks; instances of extortion on the part of medical workers; and a delay in the introduction of information technologies - the electronic polyclinic, the electronic medical card, the electronic case history and the electronic queue - which prevents the reduction of corruption risks in the sphere (Anti-Corruption Agency of the Republic of Uzbekistan, 2021). The data cited show that health care has already been recognized by the State as a sphere of heightened corruption risk, which serves as an argument in favour of a special procedural regime rather than of the retention of the general procedure.

The principal difficulty consisted in the absence of open comparable statistics on the consideration of appeals in the Republic of Uzbekistan. Since the results of the departmental assessment carried out under Resolution of the Cabinet of Ministers No. 341 (2018) are not made public, and the reports published under Article 35 of the Law are not unified as to their composition of indicators, a quantitative assessment of the frequency of extensions of periods, of the proportion of repeat appeals and of the satisfaction rate could not be made. The research therefore rests upon a normative and comparative legal analysis rather than upon a statistical one. It is characteristic that this very difficulty confirms the existence of the third gap: the absence of a source of data for research is a consequence of the closed character of monitoring.

The second difficulty is connected with the blanket character of Article 43 of the Code on Administrative Responsibility (1994). The impossibility of establishing, from the text of the legislation, which reasons for the extension of a period are valid and which answer is proper renders the assessment of law-enforcement practice in this part dependent upon evaluative criteria not consolidated normatively.

The third difficulty consists in the incomparability of the administrative traditions of the legal orders examined. The models of Germany and Singapore have been formed

within different systems of administrative justice and of public service, and a formal comparison of the periods established in them with the national ones would be incorrect. For that reason, the comparison in the present research is conducted not at the level of the numerical values of the periods but at the level of the legal constructions: the grounds for extension, the consequences of a violation and the mechanisms of control.

The comparison of the four legal orders examined permits the identification of two principal approaches to the solution of one and the same problem. The first, the normative approach, is represented by Kazakhstan, the Republic of Korea and Germany: the periods, the grounds for their extension and the consequences of their violation are established by a law, and the guarantee of observance is the liability of the official or the judicial contestation of inaction. The second, the organizational approach, is represented by Singapore: the periods are established by service quality standards, and the guarantee of observance is the transparency of the process and the constant informing of the applicant.

The results obtained in the present research are consistent with the normative approach and diverge from the organizational one. This choice is conditioned not by an assessment of the comparative effectiveness of the two models but by the particularities of the national legal system: in Uzbekistan the periods of consideration of appeals are already established by a law and are mentioned in Article 40 of the Constitution (2023), for which reason their differentiation must also be effected at the level of a law. The organizational elements of the Singaporean model - the tracking of the status of an appeal and the notification of the applicant of the measures being taken and of the indicative date of completion - are received in the proposals set out above, but as normative obligations of the body rather than as service standards.

In relation to the works of domestic authors examining the legal regulation of particular spheres of relations and the sources of such regulation (Achilova, 2023), the present research differs in its object: the procedural rather than the substantive component of the regulation is examined, and the criterion of assessment is not the completeness of the regulation of the relations but the verifiability of the actions of the administrative body.

Conclusion

The research conducted permits the following conclusions to be drawn.

First, the procedural core of the Law “On appeals of individuals and legal entities” has remained unchanged since 2017, whereas the technological and institutional environment of its application is being renewed fundamentally. The automation of unchanged procedural rules accelerates document flow but does not affect the result of the consideration of an appeal.

Second, the current regulation contains four interconnected gaps: the uniformity of the periods of consideration combined with the evaluative character of the grounds for their extension; the absence of normative criteria of a proper answer and of the procedural consequences of the failure to observe them; the departmental and closed character of the monitoring of the work with appeals; and the absence of a special procedural regime for appeals in the sphere of the provision of medical services.

Third, in order to eliminate these gaps it is proposed to set out Article 28 of the Law in a new wording providing for a differentiation of the periods of consideration and for a closed list of the grounds for their extension; to supplement the Law with Article 27¹, establishing the requirements as to the quality of the answer and the consequences of the failure to observe them; with Article 34¹, establishing open monitoring and public accountability on the basis of unified indicators; and with Article 24², establishing a special procedural regime for appeals connected with the quality, safety and timeliness of the provision of medical care.

Fourth, the proposed amendments form a single system and do not operate separately, are built into the existing structure of the Law, correspond to the constructions tested in the legal orders of the Republic of Kazakhstan, the Republic of Korea and the Federal Republic of Germany, and are designed to minimize additional expenditure from the state budget.

As a result, the proposed amendments shift the emphasis from the formal movement of a document to the actual resolution of the question raised by the citizen. The effectiveness of work with appeals ceases to be measured by the number of answers sent and begins to be measured by the content of the decisions taken, by the observance of reasonable periods and by the openness of the results. This corresponds both to the constitutional requirement that appeals be considered in the established manner and within the established periods and to the declared course towards the digitalization of public administration and the reduction of corruption risks.

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