



POLICY ANALYSISMERGER OF BAN PAUD PNF AND BAN-S/M INTO BAN-PDM: ASSESSOR'S PERSPECTIVE

Septy Rovana¹, Ahmad Suriansyah², Sulistiyana³

^{1, 2, 3} Universita Lambung Mangkurat, Banjarmasin

¹ rovanasepty@gmail.com, ² a.suriansyah@ulm.ac.id, ³ sulis.bk@ulm.ac.id

Abstract

This study aims to analyze the implementation of the merger policy in the early transition phase by positioning assessors as key actors in the national education accreditation system. The study used a qualitative approach with a public policy study design through in-depth interviews and document analysis. The results indicate that, normatively, the BAN-PDM merger policy has the potential to improve bureaucratic efficiency, consistency of accreditation standards, and integration of quality assurance across levels. However, in the early stages of implementation, various challenges were still encountered, particularly related to assessor readiness and capacity, adaptation of cross-level accreditation instruments, clarity of governance, and resistance and anxiety from educational units acting as assessors. This study also identified urgent needs in the form of strengthening assessor training, developing guidelines and SOPs for instrument harmonization, establishing competency-based assessor teams, and ongoing monitoring and evaluation.

Keywords: policy implementation, educational accreditation, BAN-PDM, assessors, MAIKA

Abstrak

Penelitian ini bertujuan menganalisis implementasi kebijakan penggabungan tersebut pada fase awal transisi dengan menempatkan asesor sebagai aktor kunci dalam sistem akreditasi pendidikan nasional. Penelitian menggunakan pendekatan kualitatif dengan desain studi kebijakan publik melalui wawancara mendalam dan analisis dokumen. Hasil penelitian menunjukkan bahwa secara normatif kebijakan penggabungan BAN-PDM berpotensi meningkatkan efisiensi birokrasi, konsistensi standar akreditasi, dan integrasi penjaminan mutu lintas jenjang. Namun, pada tahap awal implementasi masih ditemukan berbagai tantangan, terutama terkait kesiapan dan kapasitas asesor, adaptasi instrumen akreditasi lintas jenjang, kejelasan tata kelola, serta resistensi dan kecemasan satuan pendidikan sebagai asesi. Penelitian ini juga mengidentifikasi kebutuhan mendesak berupa penguatan pelatihan asesor, penyusunan panduan dan SOP harmonisasi instrumen, pembentukan tim asesor berbasis kombinasi kompetensi, serta monitoring dan evaluasi berkelanjutan.

Kata kunci: implementasi kebijakan, akreditasi pendidikan, BAN-PDM, asesor, MAIKA



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INTRODUCTION

Educational accreditation is a strategic instrument in the national education quality assurance system. Through the accreditation mechanism, the government not only assesses the suitability of educational institutions based on established standards but also ensures public accountability for the quality of educational services provided to the community. In quality assurance studies, accreditation is understood as a form of external quality assurance that serves to encourage improvements in educational quality and transparency in educational institution governance.^{1,2}

For years, education accreditation in Indonesia has been carried out by two separate national institutions: the National Accreditation Board for Early Childhood and Non-Formal Education (BAN PAUD PNF) and the National Accreditation Board for Schools/Madrasahs (BAN-S/M). This institutional separation is based on differences in the characteristics and levels of educational services. However, various studies have shown that institutional fragmentation in the quality assurance system has the potential to lead to overlapping authorities, differences in assessment mechanisms and instruments, and limited coordination between levels, ultimately impacting the effectiveness and efficiency of education accreditation.³

In response to these dynamics, the government, through the Ministry of Education, Culture, Research, and Technology, issued Regulation of the Minister of Education, Culture, Research, and Technology Number 38 of 2023 concerning Accreditation of Early Childhood, Primary, and Secondary Education. This regulation marks a fundamental policy shift through the merger of BAN PAUD PNF and BAN-S/M into a single integrated accreditation agency, the National Accreditation Agency for Early Childhood, Primary, and Secondary Education (BAN-PDM). This merger policy is aimed at increasing institutional efficiency, simplifying accreditation procedures, strengthening governance, and ensuring consistent standards and public accountability within the national accreditation system.

Although the BAN-PDM merger policy has strategic objectives, its implementation in practice is not without challenges. Changes in institutional and regulatory structures have direct implications for accreditation mechanisms, instrument adjustments, and coordination patterns between the national and provincial BANs. From a public policy implementation perspective, the success of a policy is not solely determined by regulatory design but is also heavily influenced by the implementing actors at the operational level who implement the policy in the real-world

¹ Abdul Malik et al., *Peran Akreditasi Dalam Meningkatkan Penjaminan Mutu Pendidikan*, 3, no. 2 (2025): 102–12.

² Izzatul Islamiya and Triana Rosalina Noor, *Akreditasi Sekolah Dan Peningkatan Mutu Pendidikan*, 3, no. 2 (2024).

³ Islamiya and Noor, *Akreditasi Sekolah Dan Peningkatan Mutu Pendidikan*.

context. Implementing actors have discretion in interpreting and implementing policies, thus playing a crucial role in determining policy outcomes on the ground.^{4,5}

In the context of accreditation policy, BAN-PDM assessors occupy a strategic position as street-level bureaucrats who bridge normative policy with accreditation practices in educational institutions. Assessors interact directly with educational institutions, implement accreditation instruments, and face the demands of adapting to policy and system changes. A bottom-up approach to policy implementation analysis emphasizes that the experiences, perceptions, and practices of field actors are crucial sources of information for assessing the effectiveness of a public policy, particularly during periods of institutional transition.⁶

To date, studies on educational accreditation policy in Indonesia have been dominated by normative analysis of regulations or document-based evaluations. Research specifically examining the implementation of the policy of merging BAN PAUD PNF and BAN-S/M into BAN-PDM from the perspective of assessors as policy implementers is still relatively limited. Yet, the assessor's perspective is crucial for explaining the gap between policy objectives and the reality of accreditation implementation on the ground.

Based on this context, this study focuses on the analysis of the policy of merging BAN PAUD PNF and BAN-S/M into BAN-PDM as stipulated in Permendikbudristek Number 38 of 2023, with an emphasis on the assessors' empirical experience in implementing accreditation. This study aims to analyze the dynamics of policy implementation, the challenges faced, and the implications of the merger policy on the quality, efficiency, and effectiveness of the education accreditation system. Conceptually, this study contributes to the enrichment of education policy studies through an analysis of policy implementation based on the perspective of implementers, while also providing policy input for strengthening the governance and sustainability of the education accreditation system in Indonesia.

RESEARCH METHODS

Types and Approaches of Research

This research uses a qualitative approach with a public policy study type. The qualitative approach was chosen because this study aims to understand in-depth the implementation process of the policy of merging the National Accreditation Board for Early Childhood Education and Non-Formal Education (BAN PAUD PNF) and the National Accreditation Board for

⁴ Michael Lipsky, *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services* (1980).

⁵ Emy Kholifah, *Pemikiran Kritis Tentang Bureaucratstreet Level Theory Oleh Michael Lipsky*, 2013, 120–48.

⁶ Rulinawaty Kasmad, *Implementasi Kebijakan Publik* (2018).

Schools/Madrasahs (BAN-S/M) into the National Accreditation Board for Early Childhood Education, Primary Education, and Secondary Education (BAN-PDM).

A qualitative approach allows researchers to explore the meanings, perceptions, interpretations, and subjective experiences of policy-implementing actors in the context of real-world and dynamic policy implementation. Public policy is understood not only as a product of formal regulation but also as a social practice influenced by actors, organizational structures, and institutional contexts.

In his book, John W. Creswell⁷ emphasizes that qualitative research is appropriate when researchers want to understand policy phenomena from the perspective of participants, especially when the phenomena are complex, contextual, and not fully explained through quantitative data.

The type of public policy study in this research focuses on the analysis of policy implementation, namely the stage where policies are translated from normative documents into operational practices in the field. Thus, this research examines not only what is written in the policy but also how the policy is implemented, negotiated, and interpreted by policy implementers.

Research Focus

The focus of this research is the implementation of the policy of merging educational accreditation institutions into BAN-PDM, with an emphasis on the perspective of assessors as actors implementing policies at the field level (street-level implementers).

In detail, the focus of the study includes:

1. The assessor's understanding of the BAN merger policy, including understanding of the objectives, substance, and changes to the accreditation system after the merger.
2. The assessor's experience in implementing accreditation after the merger, including work procedures, institutional coordination, and adaptation to new regulations.
3. Challenges of policy implementation at the operational level, whether technical, administrative, institutional, or human resource.
4. The implications of the merger policy on the quality and effectiveness of the accreditation system, particularly in ensuring the quality of educational services.

This focus was chosen because in public policy studies, the implementation stage is a determining factor in the success or failure of a policy. Aaron Wildavsky Jeffrey L.

⁷ John W. Creswell, *Qualitative Inquiry and Research Design: Choosing Among Five Approaches*, 4th ed. (Sage Publications, 2017).

Pressman⁸emphasizes that the success of a policy is largely determined by how the policy is implemented by implementing actors in the field, not solely by the quality of policy formulation.

Data Analysis Techniques

Data analysis was conducted qualitatively using an interactive analysis model developed by Matthew B. Miles A. Michael Huberman Johnny Saldaña⁹, which cover:

1. Data reduction, namely the process of selecting, focusing on, and simplifying raw data obtained from interviews and documentation;
2. Data presentation, namely the arrangement of data in the form of narratives, matrices, or analytical themes so that it is easy to understand;
3. Drawing conclusions and verification, namely interpreting the meaning of data and testing the consistency of research findings.

The analysis process is carried out simultaneously and repeatedly from data collection to the final stage of the research, thus allowing for continuous deepening and refinement of the findings.

RESULTS AND DISCUSSION

The results of the study indicate that the merger of the National Accreditation Board for Early Childhood and Non-Formal Education (BAN PAUD PNF) and the National Accreditation Board for Schools/Madrasahs (BAN-S/M) into the National Accreditation Board for Early Childhood, Primary and Secondary Education (BAN-PDM) has significant implications for the national education quality assurance system. This merger policy was stipulated through Permendikbudristek Number 38 of 2023 and began to be implemented operationally in 2024. Thus, this research period is in the early phase of policy transition, which empirically is the most crucial stage in determining the effectiveness of public policy implementation.^{10,11}

Normatively, the BAN merger policy is designed to improve bureaucratic efficiency, strengthen the consistency of accreditation standards, and integrate quality assessment systems across educational levels. However, field findings indicate that initial implementation in 2024 still faces various challenges, particularly related to the readiness of policy implementers, in this case assessors, and the adaptation of cross-level accreditation instruments. Assessors who experienced a shift in duties from early childhood education to primary and secondary education, or vice versa,

⁸ Aaron Wildavsky Jeffrey L. Pressman, *Implementation* (University of California Press, 1984).

⁹ Matthew B. Miles A. Michael Huberman Johnny Saldaña, *Qualitative Data Analysis A Methods Sourcebook*, 3rd ed. (2014).

¹⁰ Permendikbudristek, *Akreditasi Pendidikan Anak Usia Dini, Pendidikan Dasar, Dan Pendidikan Menengah*, 2023.

¹¹ Jeffrey L. Pressman, *Implementation*.

expressed difficulty in understanding the differences in the characteristics of educational units, both in terms of learning approaches, types and forms of physical evidence, and the institutional and managerial context of the educational units.

Based on in-depth interviews, most assessors stated that the initial phase of policy implementation in 2024 was marked by a high need for adaptation. The majority of informants expressed difficulties in matching instrument indicators across levels, particularly in institutional management and learning processes. Furthermore, many assessors felt that the initial training provided did not fully address the needs of assessment practices in the field, particularly in the context of cross-level visitations, which have very different characteristics.

This finding is in line with Bjorn Stensaker's view¹² which confirms that the effectiveness of an accreditation system is largely determined by the readiness and capacity of implementing actors, particularly in the initial phase of policy implementation. In the context of the BAN-PDM merger, limited assessor adaptation has the potential to impact the quality of assessments and the consistency of accreditation recommendations. Furthermore, this study also corroborates the findings of Lee Harvey and James Williams.¹³ which states that although accreditation has the potential to improve the quality of education, the process can turn into an administrative burden if it is not accompanied by adequate systemic support.

Based on in-depth interviews with assessors, this study identified five key pressing needs during the transition period leading up to the 2024 policy implementation. First, intensive indicator-based training is needed for assessors across levels, encompassing not only online training but also offline training, field practice, and discussions on each instrument item, accompanied by a mentoring scheme. Second, the development of concise guidelines and standard operating procedures (SOPs) for instrument harmonization is crucial, particularly a concise document mapping the criteria for matching PAUD and primary and secondary education, as well as technical SOPs for implementing visitations and reporting. Third, grouping assessor teams based on a combination of competencies is considered strategic, ensuring that each team has experienced assessors at each level or pairing assessors across levels with senior mentors. Fourth, adjustments to workloads and reporting time allocations are necessary to reduce administrative and psychological stress on assessors during the transition period. Fifth, periodic intensive monitoring and evaluation, particularly during the first one to two years of implementation, are needed to assess the consistency of the instruments, the quality of recommendations, and the accountability of the assessor team's performance.

¹² Bjorn Stensaker, *Outcomes of Quality Assurance : A Discussion of Knowledge, Methodology and Validity*, 14, no. 24361 (2008): 24361.

¹³ Lee Harvey and James Williams, *Education Fifteen Years of Quality in Higher Education*, no. July 2015 (2010): 2–36, <https://doi.org/10.1080/13538321003679457>.

In addition to internal challenges at the policy implementation level, this study also found resistance and anxiety from educational institutions acting as assessors. Several schools and madrasahs viewed the national standards resulting from the BAN-PDM merger as not fully sensitive to their local context and institutional characteristics. Therefore, comprehensive policy dissemination to educational institutions is crucial, particularly to explain the purpose of the merger, changes to the accreditation mechanism, and the position of accreditation as a quality assurance instrument, not merely an administrative evaluation tool.

Overall, the merger of BAN PAUD PNF and BAN-S/M into BAN-PDM provides long-term strategic benefits, particularly in terms of bureaucratic efficiency, consistency of accreditation standards, and increased legitimacy of the national education quality assessment system. However, this study confirms that the policy's success depends heavily on strengthening the capacity of implementing actors, providing regulatory-operational support, and a transition strategy that is sensitive to field dynamics during the initial implementation phase.

Multidimensional Analysis of Minister of Education, Culture, Research and Technology Regulation No. 38 of 2023

Minister of Education, Culture, Research, and Technology Regulation No. 38 of 2023 as the basis for the merger of the National Accreditation Agency for Early Childhood Education and Non-Formal Education (BAN PAUD PNF) and the National Accreditation Agency for Schools/Madrasahs (BAN-S/M) into the National Accreditation Agency for Early Childhood, Primary and Secondary Education (BAN-PDM) will be effectively implemented in 2024. Therefore, this policy analysis needs to be understood in the context of the initial implementation phase. Theoretically, the initial implementation phase is the phase most vulnerable to resistance, technical uncertainty, and a lack of synchronization between policy design and practice in the field.¹⁴

From a physiological perspective, the BAN-PDM merger policy encourages the fulfillment of healthy, safe, and appropriate educational facilities and infrastructure standards as a prerequisite for a learning environment that supports student development. However, in the initial implementation phase, starting in 2024, schools in remote areas still face resource constraints, both in terms of infrastructure and budget support, preventing optimal fulfillment of these standards.

Philosophically, the BAN merger reinforces the principle of a unified national education system and consistent quality assurance across levels. This policy reflects the state's efforts to build systemic coherence in education quality management, in line with public policy perspectives

¹⁴ Jeffrey L. Pressman, *Implementation*.

that emphasize the importance of alignment between actors and levels of government.¹⁵ However, the application of uniform national standards has the potential to ignore local specificities if it is not accompanied by contextual flexibility in the accreditation process.

From a religious perspective, this policy normatively strengthens moral, ethical, and accountability values in education delivery, particularly in fostering educational institutions' responsibility for the quality of their services. However, in practice, the implementation of these values still varies across regions, depending on the understanding and internalization of the new accreditation principles by educational actors.

From a pragmatic perspective, the implementation of BAN-PDM since 2024 has demonstrated potential for structural efficiency through reduced institutional duplication and simplified accreditation governance. However, the policy transition period has created technical confusion for assessors and educational units, particularly in understanding the correspondence of previously separate indicators, instruments, and procedures for cross-level accreditation.

From a psychological perspective, the initial implementation of the policy created adaptation pressures for assessors and schools. On the one hand, there was increased motivation to improve educational quality as a result of more integrated standards. On the other hand, psychological pressures arose due to the demands of new instruments, changes in assessment mechanisms, and technical uncertainty during the transition period. This situation aligns with the theory of educational change, which emphasizes that system reform requires gradual, supportive change management, and a focus on strengthening the capacity of implementing actors.¹⁶

In the socio-cultural dimension, the BAN-PDM policy has the potential to broaden the equity of educational quality across regional contexts with more integrated standards. However, in the early stages of implementation, resistance emerged when the accreditation standards were perceived as not fully reflecting local social and cultural conditions. This underscores the importance of a policy approach that is responsive to the context and cultural diversity of education.¹⁷

Meanwhile, from a sociological dimension, the implementation of BAN-PDM creates new patterns of interaction between educational actors, including cross-level assessors and educational units with diverse characteristics. This interaction opens up opportunities for collaboration and exchange of good practices, but also has the potential to cause tension between levels if it is not balanced with effective communication and a clear division of roles.

¹⁵ Paul Cairney, *Evidence-Based Best Practice Is More Political than It Looks: A Case Study of the 'Scottish Approach'*, 2016, 1–17.

¹⁶ Michael Fullan, *The New Meaning of Educational Change*, 5th ed. (2015).

¹⁷ Geneva Gay, *Culturally Responsive Teaching Theory, Research, and Practice*, 3rd ed. (2018).

From an economic perspective, the BAN merger is seen as bureaucratically efficient in the medium and long term, allowing for institutional cost savings and a more focused allocation of resources to improve quality. However, in the initial implementation phase, schools still face additional costs for meeting infrastructure standards, preparing documents, and accreditation administration to adapt to the new system.

Overall, a multidimensional analysis of Minister of Education, Culture, Research, and Technology Regulation No. 38 of 2023 shows that the BAN-PDM merger has broad implications across eight key dimensions: physiological, philosophical, religious, pragmatic, psychological, sociocultural, sociological, and economic. As summarized in Table 1, this policy essentially strengthens the unity of the national education system, expands access to equitable quality, and improves bureaucratic efficiency. However, the main challenges in the initial implementation phase starting in 2024 lie in assessor adaptation, school resistance to the new standards, and the cost burden of meeting accreditation standards.

Table 1. Multidimensional Analysis of Minister of Education, Culture, Research and Technology Regulation No. 38 of 2023

Dimensions	Impact	Challenge
Physiological	Safe and adequate facilities and infrastructure	Schools in remote areas struggle to meet standards
Philosophical	Unity of the national education system	National standards can ignore local specificities
Religion	Moral values & accountability	Implementation varies between regions
Pragmatic	Bureaucratic efficiency	Adaptation of new instruments for assessors
Psychological	Motivation of assessors & schools increases	Pressure meets new instruments
Social, Cultural & Sociological	Expanding access & interaction between actors	School resistance & potential for inter-level conflict
Economy	Cost efficiency, allocation of funds to quality	Additional burden for schools to meet standards

Based on this multidimensional analysis, it can be confirmed that Permendikbudristek No. 38 of 2023 forms a normative policy framework with broad implications for the national education accreditation system. However, this analysis is still at the level of policy design and conceptual implications, thus not fully explaining how the policy is translated, negotiated, and implemented by implementing actors at the implementation level. Therefore, the next section

discusses the dynamics of the implementation of the BAN-PDM merger policy through the Accreditation Policy Implementation Analysis Model (MAIKA) by placing the assessor's perspective as a key actor.

Discussion on the Implementation of BAN-PDM Policy within the MAIKA Model Framework

In contrast to the policy analysis in the previous section, which positioned Permendikbudristek No. 38 of 2023 as a normative design, this discussion focuses on how the BAN-PDM merger policy is implemented in the field through the experience and capacity of assessors as key actors.

1. Policy and Regulation Design from an Assessor's Perspective

From the assessors' perspective, the BAN-PDM merger policy design is understood as an effort to integrate clearly formulated cross-level accreditation standards. However, research findings indicate that regulatory clarity does not necessarily guarantee ease of implementation. Assessors face challenges in translating previously separate indicators and instruments into consistent assessment practices.

In the MAIKA Model, this condition indicates a gap between policy design and implementation capacity, as emphasized in the policy implementation literature that the success of a policy is largely determined by the ability of field actors to understand and operationalize formal rules.¹⁸

2. Accreditation Governance and Institutions

The merger of BAN-PDM changed the accreditation governance model, particularly in terms of institutional coordination and the division of roles between units. Assessors at various levels were required to work within a more integrated organizational structure, but in the initial implementation phase, there was still uncertainty regarding the coordination mechanism and decision-making process.

Within the MAIKA framework, this aspect emphasizes that policy effectiveness depends not only on regulations but also on the quality of governance and institutional capacity. Weak coordination has the potential to reduce the consistency of accreditation recommendations, particularly for educational institutions with unique characteristics.

3. The Role and Capacity of Assessors as Key Actors

Research findings demonstrate that assessors play a central role in bridging normative policies with the realities of educational units. The merger of BAN-PDM

¹⁸ Jeffrey L. Pressman, *Implementation*.

requires increased assessor capacity, both in terms of cross-level understanding, technical assessment competency, and communication skills with schools.

Assessors who have not received adequate training and guidance tend to have difficulty interpreting new standards. This reinforces the MAIKA Model's argument that the capacity of implementing actors is a key determinant of policy success, in line with the street-level bureaucracy approach that positions implementers as the de facto policy makers in the field.¹⁹

4. Impact and Effectiveness of Accreditation in Practice

In practice, the effectiveness of the BAN-PDM merger policy has not been fully achieved evenly. Assessors reported that accreditation recommendations were still influenced by time constraints, differences in school readiness, and technical uncertainty during the transition period.

However, this policy also opens up opportunities for quality improvement through more integrated and consistent standards. In MAIKA, accreditation effectiveness is understood as the result of a dynamic interaction between policy design, governance, and assessor capacity, not simply an administrative output in the form of an accreditation ranking.

5. Monitoring, Evaluation, and Policy Socialization

The MAIKA model positions monitoring and evaluation as a strengthening mechanism for implementation, particularly in the initial phase of the policy, starting in 2024. Findings indicate that regular evaluation of instruments, continued training for assessors, and intensive outreach to schools play a crucial role in reducing resistance and increasing policy acceptability.

Thus, MAIKA emphasizes that the implementation of accreditation policies is processual and adaptive, not linear, so it requires continuous feedback to achieve policy effectiveness.

MAIKA Novelty Model Affirmation

The Accreditation Policy Implementation Analysis Model (MAIKA) offers a conceptual contribution by integrating analysis of policy design, institutional governance, actor capacity, and policy impact within a holistic framework centered on the assessor's perspective. Unlike classic policy implementation models that tend to separate structural (top-down) approaches from field actors (street-level bureaucracy), MAIKA combines both approaches within a single accreditation policy implementation analysis framework.

¹⁹ Lipsky, *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services*.

By positioning assessors as key actors, MAIKA explains that the quality of accreditation policy implementation is determined not only by regulatory clarity but also by the actors' ability to interpret, negotiate, and operationalize the policy in practice. Therefore, MAIKA addresses not only the question of why policies succeed or encounter obstacles, but also how the interaction between policy design, governance, and actor capacity shapes the effectiveness of accreditation policies in practice.

Policy Implications for Strengthening the Implementation of BAN-PDM from the Perspective of the MAIKA Model

Based on the research results and discussion, the recommended policy implications are not solely administrative in nature, but are also directed at strengthening the capacity of actors and the governance of accreditation policy implementation. Within the framework of the Accreditation Policy Implementation Analysis Model (MAIKA), these policy implications are derived from the interaction between regulatory design, the role of assessors, institutional governance, and policy evaluation mechanisms.

1. Strengthening Indicator-Based Assessor Training and Cross-Level Field Practice

The merger of BAN-PDM requires assessors to understand cross-level accreditation indicators, which were previously assessed separately. Therefore, policies need to focus on strengthening substantive and applicable training, focusing not only on understanding regulations but also on practical assessment practices in the field.

From MAIKA's perspective, this training serves to strengthen the capacity of implementing actors, who are the primary determinants of policy success. Policy implementation literature confirms that contextual and ongoing training improves the consistency of policy implementation and the quality of public policy output.^{20,21}

2. Preparation of a Short Guide and SOP for Harmonization of Accreditation Instruments

The next policy implication is the need to develop concise guidelines and standard operating procedures (SOPs) for harmonizing accreditation instruments across levels. These guidelines serve as practical references for assessors to minimize technical ambiguity in matching indicators and assessment criteria.

In the MAIKA Model, policy instruments are understood as part of a policy design that must be operational, not merely normative. William N. Dunn²² emphasizes that

²⁰ Jeffrey L. Pressman, *Implementation*.

²¹ Michael J. Hill & Peter L. Hupe, *Implementing Public Policy: Governance in Theory and in Practice* (Sage Publications, 2002).

²² William N. Dunn, *Public Policy Analysis* (2016).

public policies that are not supported by clear technical instruments are at risk of implementation failure even though the policy objectives have been well formulated.

3. Assignment of Assessor Team Based on a Combination of Competencies and Structured Mentoring

The merger of BAN-PDM creates a need for assessor teams with diverse backgrounds and experience across levels. Therefore, assessor assignment policies need to be geared toward creating teams based on a combination of competencies, accompanied by a structured mentoring mechanism between senior and relatively new assessors.

This implication is in line with the street-level bureaucracy approach which positions field actors as determinants of the quality of public policy in practice.²³In MAIKA, this strategy strengthens the role of actors while building a continuous organizational learning process.

4. Implementation of Periodic Monitoring and Evaluation During the Policy Transition Phase

The research results indicate that the initial implementation phase of the BAN-PDM merger policy, starting in 2024, is a critical period requiring intensive monitoring and evaluation mechanisms. Regular monitoring and evaluation will allow for early identification of implementation obstacles, assessment inconsistencies, and the need for instrument adjustments.

Within the MAIKA framework, monitoring and evaluation are positioned as feedback mechanisms that ensure the sustainability of policy implementation. This aligns with the policy evaluation model proposed by Dunn (2018), which emphasizes the importance of evaluation as an integral part of the policy cycle, not simply a final stage.

5. Continuous Socialization to Educational Units to Increase Policy Acceptability

Another policy implication is the need for ongoing policy dissemination to educational institutions. Dissemination serves not only to convey information but also as a space for dialogue to build understanding, trust, and legitimacy for the new accreditation policy.

In MAIKA, socialization is seen as part of the implementation governance that influences the acceptance of policies by target actors. Merilee S. Grindle²⁴emphasized that the acceptance of policies by target groups is a crucial factor in determining the success of public policy implementation.

²³ Lipsky, *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services*.

²⁴ Merilee S. Grindle, *Politics and Policy Implementation in the Third World* (2017).

Synthesis of Policy Implications

Overall, the policy implications formulated in this study confirm that the successful implementation of Permendikbudristek No. 38 of 2023 depends not only on the strength of the regulations, but also on the capacity of actors, clarity of instruments, and mechanisms for policy evaluation and communication. By utilizing the MAIKA Model as an analytical framework and basis for formulating policy implications, the resulting recommendations are applicable, contextual, and oriented towards continuously strengthening the quality of educational accreditation.

The findings of this study reflect the dynamics of the initial phase of policy implementation since 2024, and therefore do not fully reflect the long-term impact of the BAN-PDM merger on improving education quality. Therefore, generalizations of the findings need to be understood contextually, and further research in a more mature implementation phase is needed to test the policy's sustainable effectiveness.

CONCLUSION

This study aims to analyze the implementation of the policy of merging the National Accreditation Agency for Early Childhood Education and Non-Formal Education (BAN PAUD PNF) and the National Accreditation Agency for Schools/Madrasahs (BAN-S/M) into the National Accreditation Agency for Early Childhood Education, Primary and Secondary Education (BAN-PDM) as regulated in Permendikbudristek Number 38 of 2023 which began to be implemented operationally in 2024. By placing assessors as key actors, this study examines the dynamics of policy implementation in the early transition phase which is empirically the most crucial period in determining the effectiveness of public policy.

The research results indicate that, normatively, the BAN-PDM merger policy has the strategic objective of improving bureaucratic efficiency, strengthening the consistency of accreditation standards, and integrating quality assurance systems across educational levels. However, in the initial stages of implementation, the policy still faces various challenges, particularly related to assessors' readiness and capacity to adapt cross-level accreditation instruments, clarity of institutional governance and coordination, and limited operational technical guidance.

This study also found that the merger of BAN-PDM has resulted in adaptation pressures for both assessors and educational institutions serving as assessors. Assessors face cross-level competency demands that are not yet fully met by adequate training and mentoring, while educational institutions continue to show resistance and anxiety toward accreditation standards

that are perceived as not fully sensitive to the socio-cultural context and local institutional characteristics.

Through a multidimensional analysis of Ministerial Regulation of Education, Culture, Research, and Technology Number 38 of 2023, this study confirms that the BAN-PDM merger policy has broad implications across physiological, philosophical, religious, pragmatic, psychological, socio-cultural and sociological dimensions, as well as economic dimensions. While this policy has the potential to strengthen the unity of the national education system and ensure equitable quality in the long term, implementation challenges in the initial phase indicate that the policy's success is largely determined by an adaptive transition strategy and strengthening the capacity of implementing actors.

The main contribution of this research lies in the development of the Accreditation Policy Implementation Analysis Model (MAIKA), which positions assessors as key actors in bridging normative policy design with implementation practices in the field. The MAIKA model demonstrates that the effectiveness of accreditation policies is the result of a dynamic interaction between policy design, institutional governance, actor capacity, and ongoing monitoring and evaluation mechanisms. Thus, MAIKA not only serves as an analytical framework for BAN-PDM policy implementation but also has the potential to be applied as an evaluative model for educational accreditation policies in other contexts.

Suggestions and Recommendations

Based on the research conclusions, the recommendations proposed are not only administrative in nature, but are directed at strengthening the implementation of accreditation policies in a substantive and sustainable manner.

First, policymakers need to prioritize strengthening assessor capacity through cross-level training based on indicators and field practice. This training should emphasize not only regulatory understanding but also technical assistance, case studies, and structured mentoring mechanisms to ensure consistency in accreditation assessments.

Second, it is necessary to develop concise guidelines and standard operating procedures (SOPs) for harmonizing accreditation instruments that are practical and easily accessible to assessors. Clarity in these technical instruments is crucial to minimize implementation ambiguity and reduce the administrative burden during the policy transition phase.

Third, assessor governance and assignment mechanisms need to be directed toward the formation of teams based on a combination of cross-level competencies, supported by a continuous mentoring and supervision system. This strategy not only strengthens the quality of

policy implementation but also encourages organizational learning within the national accreditation system.

Fourth, the implementation of the BAN-PDM merger policy requires intensive, periodic monitoring and evaluation mechanisms, particularly in the first one to two years of implementation. This monitoring and evaluation serves as policy feedback to assess instrument consistency, the quality of accreditation recommendations, and assessor performance accountability.

Fifth, policy dissemination to educational units must be carried out continuously and in a dialogue. Participatory dissemination is expected to increase understanding, acceptability, and legitimacy of the accreditation policy as a quality assurance instrument, not simply an administrative evaluation tool.

As an academic recommendation, further research is recommended to examine the implementation of the BAN-PDM merger policy at a more mature stage and to test the effectiveness of the MAIKA Model through a comparative approach across regions and educational levels. This further research is expected to enrich our understanding of the dynamics of accreditation policy implementation and its contribution to the sustainable improvement of national education quality.

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