

Legal Legitimacy and Effectiveness of the KMPMDP Program in Preventing Maladministration Through Policy Cycle

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Article	Abstract
<p>How to cite: Roshe Adeltha Hendri, et al., 'Legal Legitimacy and Effectiveness of the KMPMDP Program in Preventing Maladministration Through Policy Cycle' (2026) Vol. 7 No. 1 Rechtenstudent Journal Sharia Faculty of KH Achmad Siddiq Jember State Islamic University.</p> <p>DOI: 10.35719/rch.v7i1.414</p> <p>Article History: Submitted: 03/01/2026 Reviewed: 11/02/2026 Revised: 04/03/2026 Accepted: 15/03/2026</p> <p>ISSN: 2723-0406 (printed) E-ISSN: 2775-5304 (online)</p>	<p>This study analyzes the implementation of the Community Group Concerned with Maladministration (KMPMDP) program conducted by the Ombudsman of the Republic of Indonesia Bengkulu Representative using Jann and Wegrich's (2007) Policy Cycle Theory integrated with Administrative Law perspectives. The KMPMDP program represents a strategic innovation in public service oversight based on community participation that implements principles of administrative democratization and governmental accountability. Using a qualitative approach with an interpretive paradigm, this research examines how the program is implemented through five policy cycle stages while considering dimensions of legality, legitimacy, and general principles of good governance (AUPB). Data were collected through in-depth interviews with key actors, participatory observation of program activities, and documentary studies. Findings reveal that the KMPMDP program has a strong legal foundation based on Law No. 37/2008 on the Ombudsman RI and fulfills administrative law principles at each policy cycle stage. However, implementation faces technical constraints, particularly in edu-visit coordination, impacting effectiveness and efficiency as part of AUPB. The study shows a gap between formal rechtmatigheid (legal validity) and substantive doelmatigheid (effectiveness), with only 50% of planned edu-visits executed. This research contributes theoretically to participatory policy implementation studies from an administrative law perspective and provides practical recommendations for optimizing legitimate and accountable community-based oversight programs.</p> <p>Keywords: <i>Policy Implementation, KMPMDP, Maladministration, Ombudsman.</i></p> <p>Abstrak Penelitian ini menganalisis implementasi Program Kelompok Masyarakat Peduli Maladministrasi (KMPMDP) yang dilaksanakan oleh Ombudsman RI Perwakilan Bengkulu dengan menggunakan kerangka Teori Siklus Kebijakan dari Jann dan Wegrich (2007) yang diintegrasikan dengan perspektif Hukum Administrasi Negara. Program KMPMDP merupakan inovasi strategis pengawasan pelayanan publik berbasis partisipasi masyarakat yang mengimplementasikan prinsip demokratisasi administrasi dan akuntabilitas pemerintahan. Penelitian menggunakan pendekatan kualitatif dengan paradigma interpretatif untuk menganalisis implementasi program melalui lima tahapan siklus kebijakan dengan mempertimbangkan dimensi legalitas, legitimasi, dan Asas-Asas Umum Pemerintahan yang Baik (AUPB). Data dikumpulkan melalui wawancara mendalam dengan aktor kunci, observasi partisipatif terhadap kegiatan program, dan studi dokumentasi terhadap regulasi serta laporan kegiatan. Hasil penelitian menunjukkan bahwa program KMPMDP</p>

memiliki landasan hukum yang kuat berdasarkan UU No. 37 Tahun 2008 tentang Ombudsman RI dan telah memenuhi prinsip hukum administrasi negara pada setiap tahapan siklus kebijakan. Namun, implementasi menghadapi kendala teknis terutama dalam koordinasi edu-visit yang berimplikasi pada aspek efektivitas dan efisiensi sebagai bagian dari AUPB. Penelitian menunjukkan adanya kesenjangan antara *rechtmatigheid formal* (keabsahan hukum) dan *doelmatigheid substantief* (efektivitas), dengan hanya 50% edu-visit yang terlaksana. Penelitian ini memberikan kontribusi teoretis dalam kajian implementasi kebijakan partisipatif dengan perspektif hukum administrasi negara serta rekomendasi praktis bagi optimalisasi program pengawasan berbasis masyarakat yang legitimate dan akuntabel.

Kata Kunci: *Implementasi Kebijakan, KMPMDP, Maladministrasi, Ombudsman.*

Introduction

The quality of public services is a fundamental indicator of government performance that directly impacts public trust and the effectiveness of state governance. From the perspective of State Administrative Law, public services are a constitutional obligation of the state to its citizens as mandated by the 1945 Constitution. Law Number 25 of 2009 concerning Public Services affirms that public services are activities to fulfill service needs in accordance with statutory regulations for every citizen for goods, services, and administrative services provided by public service providers.¹

From the perspective of state administrative law, the implementation of public services must fulfill the General Principles of Good Governance (AUPB) as regulated in Law No. 30 of 2014 concerning Government Administration, which includes the principles of legal certainty, benefit, impartiality, accuracy, not abusing authority, openness, public interest, and good service.² However, maladministration practices in public services are still a structural problem that indicates a gap between normative standards and the reality of implementation, as well as indicating a violation of the AUPB.³

Maladministration, in the study of state administrative law, is a form of deviation from the legal and ethical obligations of government administration.⁴ Heruyanto (2021) defines it as a category of actions that violate the law, procedures, or ethics in the implementation of public administration, such as prolonged delays, procedural deviations, abuse of authority, and discrimination.⁵ Caiden (2016) emphasized that maladministration is a systemic performance that does not function properly, providing benefits to the perpetrator while the victim feels disadvantaged without adequate compensation.⁶

Indonesian Ombudsman data shows a significant upward trend in maladministration reports: 7,204 reports in 2020, 7,186 reports in 2021, 8,292 reports in 2022, 8,458 reports in 2023, and 10,846 reports in 2024. The 50.5% increase in five years indicates maladministration as a systematic problem that requires innovative policy interventions with a strong legal basis.⁷

¹ Law of the Republic of Indonesia. (2009). Law no. 25 of 2009 on public services. *Экономика Региона*, 32.

² Pemerintahan, A., Rahmat, D., Yang, T., Esa, M., & Indonesia, P. R. (2014). *Undang-undang NO.30 Tahun 2014* (Issue 292).

³ Grindle, M. S. (1980). *Politics and Policy Implementation in the third world*. In *Princeton University Press, Princeton, New Jersey*.

⁴ Harbani, P. (2007). *TEORI ADMINISTRASI PUBLIK*. Bandung: Alfabeta.

⁵ Heruyanto, I. D. (2021). *Mengenal Maladministrasi*. *Ombudsman RI*. <https://ombudsman.go.id/artikel/r/artikel--mengenal-maladministrasi>

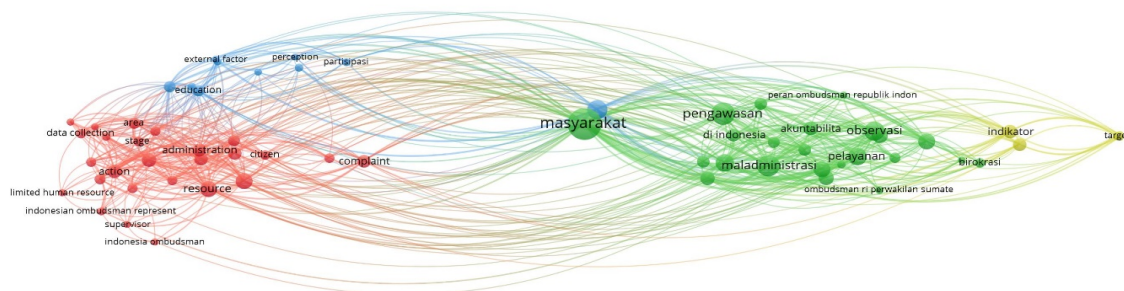
⁶ Caiden, G. E. (2016). *MALADMINISTRATION REVISITED 1 Gerald E. Caiden 2. August, 1–20*.

⁷ Ombudsman RI. (2024). *Meneguhkan Memajukan Pencegahan Pengawasan, Maladministrasi*.

Responding to the limitations of direct supervision and implementation of the principle of community participation, the Indonesian Ombudsman developed the Community Group Concerned about Maladministration (KMPMDP) program as an innovation in participatory supervision.⁸ This program is regulated through internal policies as an implementation of Article 7 letter f of Law Number 37 of 2008⁹ and Ombudsman Regulation No. 41 of 2019 concerning Guidelines for Implementing Maladministration Prevention¹⁰. From the perspective of state administrative law, the KMPMDP program represents several important concepts: (1) delegation of supervision to the community as a form of shared governance; (2) implementation of the principle of open government; (3) strengthening external accountability through social control; and (4) operationalization of the principle of responsive governance.¹¹

Bibliometric analysis using VOSviewer on 151 research articles (2015-2025) shows that studies by the Indonesian Ombudsman are still dominated by macro issues surrounding public services, report handling mechanisms, accountability, and governance. No specific clusters or keywords were found related to the KMPMDP program or structured participatory oversight formally initiated by the Ombudsman with a state administrative law perspective, indicating a significant research gap.

Picture 1. Network Visualization Publication of Research Articles on the Implementation of the Monitoring Program by the Indonesian Ombudsman



Previous research by Setiawan (2023)¹², Hafifah (2025)¹³, and Irawan & Wahyudi (2023)¹⁴ also examines the implementation of the Indonesian Ombudsman program in various regions from a purely public administration perspective, but has not integrated the analysis with the legal dimension of state administrative law. This is important because public policy

⁸ Ombudsman RI Bengkulu. (2025). *Ombudsman Bengkulu dan Universitas Bengkulu Teken Kerja Sama*. <https://ombudsman.go.id/perwakilan/news/r/pwk--ombudsman-bengkulu-dan-universitas-bengkulu-teken-kerja-sama>

⁹ Law of the Republic of Indonesia. (2008). Law No. 37 of 2008 of the Republic of Indonesia.

¹⁰ Ombudsman RI. "Peraturan Ombudsman Nomor 41 Tahun 2019 Tentang Tata Cara Pencegahan Maladministrasi Penyelenggaraan Pelayanan Publik." *Bioinformatics* 22, no. 7 (2019): 874–82.

¹¹ Hill, M., & Hupe, P. (2002). Implementing public policy. *Handbook of Public Policy Analysis: Theory, Politics, and Methods*, 89–108.

¹² Setiawan, A. (2023). Implementasi Pencegahan Maladministrasi Pelayanan Publik Oleh Ombudsman Republik Indonesia. *COMSERVA: Jurnal Penelitian Dan Pengabdian Masyarakat*, 2(10), 2153–2163.

¹³ Hafifah, E. P. (2025). Implementasi Program Penerimaan Verifikasi Laporan On The Spot (PVL OTS) Oleh Perwakilan Ombudsman Republik Indonesia Provinsi Sumatera Barat. In *Jurnal ISO: Jurnal Ilmu Sosial, Politik dan Humaniora* (Vol. 5, Issue 2).

¹⁴ Irawan, F. A., & Wahyudi, K. E. (2023). Implementasi Program Penilaian Kepatuhan terhadap Standar Pelayanan Publik oleh Ombudsman Republik Indonesia Perwakilan Jawa Timur. *Reslaj: Religion Education Social Laa Roiba Journal*, 6(3), 1599–1610. <https://doi.org/10.47467/reslaj.v6i3.5557>

implementation cannot be separated from the legal framework that governs the legitimacy, authority, and legal accountability of program implementation.

This study aims to identify and analyze the implementation of the KMPMDP Program by the Bengkulu Representative Office of the Indonesian Ombudsman using the Policy Cycle Theory perspective integrated with the study of State Administrative Law. The analysis is conducted comprehensively at each stage of the cycle to understand: (1) the legality and legitimacy dimensions of the program at each stage; (2) the implementation of the AUPB in program implementation; (3) aspects of legal authority and accountability; and (4) factors influencing the success or failure of implementation from an administrative law perspective.

Research Method

This study uses a qualitative approach with an interpretative paradigm to deeply understand the implementation of the KMPMDP Program from the perspective of the policy cycle and state administrative law.¹⁵ The interpretive paradigm was chosen based on the aim of understanding how the actors involved interpret, understand, and experience policy phenomena in complex social and legal contexts.¹⁶

The research was conducted at the Indonesian Ombudsman Representative Office of Bengkulu Province, Bengkulu City, from May to October 2025. The location was selected based on the consideration that the Indonesian Ombudsman Representative Office of Bengkulu is one of the active representatives implementing the KMPMDP with a strong foundation of formal cooperation with higher education institutions.

The focus of this research is the implementation of the Maladministration Concern Community Group Program (KMPMDP), which is analyzed through two integrated perspectives: (1) the Policy Cycle Theory of Jann and Wegrich Frank et al. (2007), which includes five stages; and (2) the State Administrative Law Perspective, which includes an analysis of legality, legitimacy, authority, AUPB, and legal accountability at each stage of the policy cycle.

Data collection techniques included: (1) In-depth semi-structured interviews to obtain detailed information regarding program implementation, focusing on administrative law aspects; (2) Participatory observation of program activities to observe compliance with legal procedures, the implementation of the principles of openness and participation, monitoring and evaluation mechanisms, and the dynamics of interactions between actors in the context of administrative law; (3) Documentation studies that examined relevant regulations, formal cooperation documents, program planning and evaluation documents, and activity implementation reports.

Data analysis used an interpretive qualitative analysis approach with the interactive analysis model of Matthew B. Miles and A. Michael Huberman (2014) integrated with the Policy Cycle framework and the perspective of State Administrative Law.¹⁷ The analysis process includes: (1) Data condensation with data categorization based on five stages of the policy cycle with sub-categorization of administrative law aspects (legality, legitimacy, authority, AUPB, accountability); (2) Data presentation in the form of a matrix that connects the stages of the policy cycle with aspects of state administrative law; (3) Verification through source

¹⁵ Frank, F., Miller Gerald J, & Sidney Mara S. (2007). Handbook of Public Policy. *Reference Reviews*, 21(8), 16–17.

¹⁶ Akib, H. (2010). IMPLEMENTASI KEBIJAKAN: Apa, Mengapa, dan Bagaimana HAEDAR AKIB Guru Besar Ilmu Administrasi Universitas Negeri Makassar. *Jurnal Administrasi Publik*, 1(1), 1–11.

¹⁷ Matthew B. Miles, A. Michael Huberman, J. S. (2014). *Qualitative Data Analysis: A Methods Sourcebook*.

triangulation, theory triangulation (policy cycle and HAN), and member checking with key informants.

Results and Discussion

Agenda Setting: Maladministration as a Priority Issue from a Legal Perspective

The agenda-setting stage is a crucial process in which a problem is identified and selected as an issue for serious attention. From a state administrative law perspective, agenda-setting must adhere to the principle of public interest and be based on legitimate authority.

INF-01 explained:

"For the KMPMDP, it is a priority program of the Ombudsman institution. The legal basis governing this program is the internal regulations or the chairman's circular. The KMPMDP program implements the Ombudsman's authority as stipulated in Law No. 37 of 2008, specifically Chapter IV, Article 6 concerning the supervisory function and Article 7, letter f, concerning network development. Establishing maladministration as a priority agenda is not only a policy decision, but also a legal obligation of the Ombudsman."

The determination of the KMPMDP program agenda has strong legal legitimacy because it is supported by: (1) Constitutional obligations based on Article 28D paragraph (1) of the 1945 Constitution which guarantees the right of every person to recognition, guarantee, protection, and fair legal certainty as well as equal treatment before the law; (2) The mandate of the Ombudsman Law in Law No. 37 of 2008 Article 7 which gives the Ombudsman the authority to supervise the implementation of public services and make efforts to prevent maladministration by building networks; (3) The principle of public interest where empirical data shows an increase in maladministration reports of 50.5% (2020-2024), indicating the urgency of handling in the public interest.

Table 1. Escalation of Maladministration Reports and Legal Implications

Year	Number of Reports	Alteration (%)	Administrative Law Implications
2020	7.204	-	Baseline of AUPB violations in public services
2021	7.186	-0,25%	High consistency of offense
2022	8.292	+15,39%	Significant escalation, urgency of legal intervention
2023	8.458	+2,00%	Continuous improvement trend
2024	10.846	+28,23%	High urgency, legitimacy of participatory prevention programs

The KMPMDP program agenda setting has fulfilled several AUPB, including: the principle of legal certainty, where the agenda is set based on empirical data and a clear legal basis; the principle of public interest, where the program aims to protect citizens' rights to quality public services; and the principle of accuracy, where the agenda setting is preceded by data analysis and systematic problem identification. These findings confirm that the KMPMDP program agenda setting not only meets the criteria of policy cycle theory but also has strong legal legitimacy based on the principles of the rule of law and AUPB.

Policy Formulation: Program Design with the Principle of *Rechtmatigheid*

The formulation stage involves identifying and designing alternative policies to address the problem. From a state administrative law perspective, policy formulation must meet the principles of *rechtmatigheid* (legal validity) and *doelmatigheid* (wisdom). The formulation of the KMPMDP program is based on a clear hierarchy of laws and regulations, starting with Law No. 25 of 2009 concerning Public Services, Law No. 37 of 2008 concerning the Indonesian Ombudsman, Law No. 30 of 2014 concerning Government Administration, and Ombudsman Regulation No. 41 of 2019 concerning Guidelines for the Implementation of Maladministration Prevention.

Table 2. Hierarchy of Legal Basis for the KMPMDP Program

Level	Regulations	Relevant Substance
Act	Law no. 37 of 2008 Article 7 letter f	The Ombudsman can build a working network with institutions/individuals
Act	Law no. 25 of 2009 Article 35 paragraph (3)	The public has the right to participate in monitoring the provision of services
Act	Law no. 30 of 2014	General Principles of Good Governance
Ombudsman Regulations	Regulation No. 41 of 2019	Guidelines for Implementing Maladministration Prevention
Internal Policy	Circular Letter of the Chairman of the Indonesian Ombudsman	Determination of KMPMDP as a Priority Program

INF-01 explains the legal considerations in the formulation:

“The formulation of the KMPMDP program takes legal aspects into account. We ensure that every element of the program has a strong legal basis, from the authority to establish networks and community engagement mechanisms to legal protection for participants. This is crucial to ensure the program does not violate authority and provides legal certainty.”

The formulation of the KMPMDP program is carried out through a deliberative process that meets the principle of accuracy based on the AUPB. The formulation process includes: (1) Analysis of authority to ensure that every activity designed is within the limits of the Ombudsman's authority and does not exceed authority; (2) Identification of stakeholders where the selection of students as targets is based on legal considerations that students as citizens have the right to participate in the supervision of public services (Law No. 25 of 2009 Article 35); (3) Design of a legal protection mechanism to ensure that program participants have legal protection in carrying out supervisory activities.

Table 3. KMPMDP Program Activity Plan and its Legal Basis

No	Activity	Goals	Legal Basis/Principles of HAN
1	Socialization and Formation	Recruitment and induction	Law 37 of 2008 Article 7 paragraph (6); Principle of Open Baarheid

2	Capacity Strengthening	Maladministration literacy	Law 25 of 2009 Article 35; Principle of Accuracy
3	Educational visits to institutions	Practice direct observation	Law 37 of 2008 Article 8; Principle of Transparency
4	Teaching Practitioner	Transfer of practical experience	Principles of Good Service

The selection of students as the main target of the program was based on considerations that fulfill the principle of *rechtmatigheid* (legitimacy). This consideration is in line with: the principle of participation, where Law No. 25 of 2009 Article 35 grants the public the right to participate in overseeing the implementation of public services; the principle of representation, where students represent community groups who will become users and providers of public services in the future; and the principle of benefit, where the program provides dual benefits, namely increasing student capacity while expanding the scope of supervision.

INF-02 explained:

"The selection of students was not a random decision. It was considered that students, as citizens, have a constitutional right to participate in oversight. Legally, the Public Service Law grants the public the right to participate in oversight. Furthermore, students are considered to have the intellectual capacity to understand the legal aspects of public service."

Decision Making: Formal and Material Legitimacy of Programs

The decision-making stage is the process of selecting alternative policies to be implemented. From the perspective of state administrative law, decisions must meet formal and material requirements to be valid decisions (*rechtmatige beschikking*). Formally, the decision to establish the KMPMDP program has met legal requirements including: (1) The authority of officials where decisions are made by authorized officials, namely the Head of the Indonesian Ombudsman who is then delegated to the Head of Representatives in the regions; (2) The correct procedure where decisions go through an internal coordination meeting mechanism and approval from the Central Indonesian Ombudsman; (3) The legal form where decisions are stated in a Circular Letter from the Head of the Indonesian Ombudsman and a formal Cooperation Document.

Table 4. Formal Legal Basis for Decision Making

Formal Aspect	Regulations/Documents	Substance
Basic Authority	Law no. 37 of 2008 Article 7 paragraph letter f	Authority to build work networks
Implementation Guidelines	Ombudsman Regulation No. 41 of 2019	Maladministration Prevention Guidelines
Program Determination	Circular Letter of the Chairman of the Indonesian Ombudsman	KMPMDP as a Priority Program
Formal Collaboration	MoU between Ombudsman and University of Bengkulu (May 24, 2025)	Legitimacy of student involvement

Materially, the decision has also met the following requirements: (1) In accordance with the objectives of the authority, where the KMPMDP program aligns with the goal of preventing

maladministration as mandated by Law No. 37 of 2008; (2) Not violating the AUPB, where the decision does not contain abuse of authority, arbitrariness, or discrimination; (3) Fulfilling the principle of proportionality, where student involvement is proportional to the goal of expanding oversight without burdening certain groups.

The legitimacy of the program was strengthened through the establishment of a formal collaboration between the Bengkulu Representative of the Indonesian Ombudsman and the University of Bengkulu on May 24, 2025. From a state administrative law perspective, this collaboration constitutes a form of *publiekrechtelijke overeenkomst* (public legal agreement) that binds both parties. This collaboration is very important legally because it: provides formal legitimacy that the university supports the program; regulates the rights and obligations of each party; and provides legal protection for the students involved that they are not engaging in illegal activities but activities protected by the official collaboration between the state institution and the university.

Policy Implementation: Implementation with the Principles of *Rechtmatigheid* and *Doelmatigheid*

The implementation phase is a crucial phase where policy designs are translated into concrete actions. From a state administrative law perspective, implementation must meet three main principles: legal validity (*rechtmatigheid*), effectiveness (*doelmatigheid*), and efficiency (*doeltreffendheid*). Implementation began with the inauguration of the membership formation on May 24, 2025, in the International Room of the Faculty of Social and Political Sciences, University of Bengkulu. From an administrative law perspective, this activity implements the principle of openness (*openbaarheid van bestuur*) through information transparency, equal access to participation, and two-way communication.

Capacity building activities are designed to meet the principle of accuracy (*zorgvuldigheidsbeginsel*), ensuring participants have adequate knowledge before undertaking field activities. Legal materials in capacity building include: (1) The legal basis for public services as stipulated in Law No. 25 of 2009 concerning service standards and the rights of service users; (2) The concept of maladministration in HAN with an explanation of *onrechtmatige overheidsdaad*, *detournement de pouvoir*, and violations of AUPB; (3) Authority and limitations with an understanding of what KMPMDP may and may not do; (4) Legal reporting mechanisms in accordance with the procedures for reporting suspected maladministration based on Ombudsman Regulation No. 58 of 2023.

However, implementation faced significant obstacles, especially in the coordination of edu-visits. The first edu-visit to B-POM RI Bengkulu was successfully implemented by fulfilling the correct legal procedures including official permits, formal approvals, visit protocols, and legal documentation. However, the second edu-visit could not be implemented due to coordination constraints with the target agency. From the perspective of AUPB, especially the principles of accuracy, effectiveness, and efficiency, this failure indicates that the principle of accuracy has not been fully implemented in the formulation stage including: (1) Lack of risk analysis with no comprehensive identification of coordination risks; (2) No pre-commitment with no initial agreement with the target agency before the program began; (3) Weak contingency planning with no backup plan if coordination with the agency fails.

Table 5. Analysis of Implementation Constraints from a State Administrative Law Perspective

Constraint Type	Manifestasi	Affected AUPB Principles	Legal Implications
Limited Time	Busy schedule, long coordination	Principle of Efficiency, Principle of Accuracy	Insufficient planning
Inter-agency Coordination	Schedule constraints, agency unpreparedness	Principles of Effectiveness	Lack of formal pre-commitment
Contingency Planning	There was no initial alternative plan	Principle of Accuracy	The formulation does not anticipate the risks

INF-02 explained the challenges from a legal perspective:

"The main challenge is coordination. Legally, we cannot force agencies to accept visits because this is voluntary, not a formal inspection. Ideally, from the formulation stage, we should have made a pre-commitment or initial understanding with the agencies to be visited. This is an important lesson regarding the aspect of accuracy in planning."

Facing obstacles, the Prevention Team adapted by replacing the second educational visit with a teaching practitioner. From an administrative law perspective, this adaptation demonstrated positive aspects, including: flexibility within legal boundaries, where adaptations were carried out within existing authority; responsiveness to real-world conditions, where implementation was adjusted to field conditions without violating program objectives; and continued benefit, where teaching practitioners continued to provide educational value to participants. However, aspects that need improvement include: the principle of effectiveness, where adaptations do not completely replace the learning value of direct field observations; and the principle of accuracy, where reactive adaptations indicate a lack of careful initial planning.

Policy Evaluation: Accountability and Legal Learning

The evaluation stage is the process of assessing the results and impact of implemented policies. From a state administrative law perspective, evaluation serves as an accountability mechanism and a learning instrument to ensure compliance with the AUPB. The Bengkulu Representative Office of the Indonesian Ombudsman conducts evaluations through a mechanism that meets the principles of transparency and accountability through evaluations based on measurable indicators and legal accountability through reporting.

Table 6. Program Achievements and Analysis of Compliance with AUPB

Indicator	Target	Realization	%	The AUPB Principles Tested	Compliance Assessment
Formation of student groups	1	1	100%	Principle of Legal Certainty	Fulfilled
Implementation of socialization	2	2	100%	Principle of Openness	Fulfilled
Implementation of edu-visit	2	1	50%	Principle of Effectiveness, Principle of Accuracy	Not Optimal

Implementation of teaching practitioners	1	1	100%	Principles of Good Service (adaptation)	Fulfilled
Knowledge increase (post-test)	≥70%	85%	121%	Principle of Benefit	Exceeding Target

The evaluation results show that the AUPB principles that were well met include: (1) The principle of legal certainty, where the program has a clear legal basis and implementation complies with governing regulations; (2) The principle of openness, where socialization and communication are carried out transparently to all parties; (3) The principle of usefulness, where the program provides tangible benefits in the form of increased literacy on maladministration among students (85% post-test results); (4) The principle of good service, where despite obstacles, the team continues to strive to provide the best learning experience through adaptation.

However, the AUPB principles that require improvement include: (1) The principle of accuracy, where the program formulation and planning have not comprehensively identified coordination risks with target agencies; (2) The principle of effectiveness, where only 50% of the designed educational visit activities can be implemented, indicating that the program objectives have not been optimally achieved; (3) The principle of efficiency, where the allocation of time and resources does not take into account the complexity of inter-agency coordination.

Comprehensive Analysis from the Perspective of State Administrative Law and Policy Cycle

A comprehensive analysis of the implementation of the KMPMDP Program shows that each stage of the policy cycle has a significant administrative legal dimension. The program has gone through five stages of the policy cycle, each with its own unique characteristics and dynamics. Each stage addresses not only the technical aspects of the policy but also the legality and compliance dimensions of the AUPB.

Table 7. Policy Cycle Integration Matrix with State Administrative Law

Cycle Stages	Policy Aspects	Dimensions of State Administrative Law	Implementation Status
Agenda Setting	Identify maladministration problems	Legal authority, Public interest principle, Empirical data	Well fulfilled
Formulation	Participatory program design	Hierarchy of regulations, Principle of accuracy, Rechtmatigheid	Well fulfilled
Decision-making	Legitimacy and establishment	Formal-material requirements, formal MoU, does not violate AUPB	Well fulfilled
Implementation	Implementation of activities	Legal protection, Principle of effectiveness-efficiency	Fulfilled, not yet optimal
Evaluation	Outcome measurement	Accountability, Transparency, Legal Learning	Well fulfilled

A crucial finding of this study is that although the KMPMDP program has met formal success indicators at almost all stages of the policy cycle, its implementation has not been optimal, as 50% of educational visit activities have not been implemented. From a state administrative law perspective, this condition indicates that fulfilling the legal validity aspect does not automatically mean fulfilling the effectiveness principle.

The KMPMDP program has met the formal legal validity aspect: it has a strong legal basis (Law No. 37 of 2008, Ombudsman Regulation), is implemented by authorized officials, has formal legitimacy through a Memorandum of Understanding (MoU), and does not substantially violate the AUPB. However, from an effectiveness perspective, the KMPMDP program has not achieved optimal results because not all planned activities have been implemented. This indicates that in state administrative law, the principle of formal validity (*rechtmatigheid*) must be complemented by substantive effectiveness (*doelmatigheid*) to achieve its true policy objectives.

From the perspective of state administrative law, the principle of due diligence requires the government to act cautiously, thoroughly, and with thorough preparation in every administrative action. Failure to anticipate coordination risks indicates that this principle has not been fully implemented. The time and coordination limitations that caused the second edu-visit to fail indicate a violation of the principle of efficiency in the implementation of state administration, where: the allocation of time was disproportionate because the time allocated did not take into account the complexity of inter-agency coordination; and the coordination process was inefficient because coordination was carried out on an ad-hoc basis without a structured and scheduled mechanism.

The obstacles encountered in the implementation of the KMPMDP program have important legal implications. Despite the program's challenges, legal accountability was met through transparent reporting of the obstacles encountered, complete documentation of each activity, and honest evaluations without concealing deficiencies. This demonstrates that even though implementation is not optimal, legal accountability is maintained. The program's adaptation, replacing the second edu-visit with a teaching practitioner, demonstrates flexibility within existing authority limits. From an administrative law perspective, this constitutes a form of discretion exercised within the law: the adaptation does not violate the program's objectives (preventing maladministration), still benefits participants, is carried out within existing authority limits, and does not harm any party. However, this discretion also indicates that initial planning was inadequate, necessitating adjustments that could have been avoided with more careful planning.

Conclusion

First, the KMPMDP program has a strong and legitimate legal basis at every stage of the policy cycle. The program has systematically gone through all five stages of the policy cycle with a clear legal basis: agenda setting has legitimacy based on the authority of Law No. 37 of 2008 and is supported by empirical data on the increase in maladministration reports of 50.5% (2020-2024), fulfilling the principle of public interest; policy formulation is designed based on a clear hierarchy of laws and regulations and considering legal aspects and public participation as a constitutional right; decision-making meets the formal and material requirements of state administrative decisions, is legitimized through a formal MoU with the University of Bengkulu, and does not violate the AUPB; implementation is carried out with attention to effectiveness for participants and legal protection within the existing corridor of authority; and evaluation is

carried out with a transparent accountability mechanism and provides feedback for improvement.

Kedua, program telah mengimplementasikan Asas-Asas Umum Pemerintahan yang Baik (AUPB) with varying degrees of success. Principles that were well-fulfilled included legal certainty, openness, utility, and impartiality. Meanwhile, principles that were not optimally implemented included accuracy, effectiveness, and efficiency.

Third, there was a gap between formal legitimacy (*rechtmatigheid*) and substantive effectiveness (*doelmatigheid*). Although the program met formal legal legitimacy and achieved most of the success indicators (100% for group formation, outreach, and teaching practitioners), its implementation was not optimal, with only 50% of educational visit activities being implemented.

Fourth, implementation obstacles stem from the lack of implementation of the principle of due diligence during the formulation stage. In-depth analysis shows that the root of the implementation obstacles lies at the policy formulation stage. From a state administrative law perspective, this indicates that the principle of due diligence (*zorgvuldigheidsbeginsel*), which requires the government to act cautiously, thoroughly, and with thorough preparation, has not been fully implemented during the planning stage.

This study recommends: (1) strengthening the implementation of the principle of due diligence in policy formulation through comprehensive risk assessments, pre-commitment with relevant agencies, and structured contingency planning; (2) developing a measurable effectiveness evaluation mechanism to ensure a balance between legality and legitimacy; (3) establishing a structured inter-agency coordination mechanism to prevent similar obstacles in future implementation.

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