

# The Effectiveness Of Implementation Of Policy Eradication Of Illegal Charges (Pungli) By The Task Unit Of Sweep Clean (Satgas Saber) In The National Education System In Indonesia

**Gamal Haryo Putro<sup>1\*</sup>, Pujo Widodo<sup>2</sup>, Soesilo Zauhar<sup>3</sup>, Andy Fefta Wijaya<sup>4</sup>, Romy Hermawan<sup>5</sup>, Lilly S. Wasitova<sup>6</sup>**

<sup>1,3,4,5</sup>Faculty of administrative science, Brawijaya University, Indonesia.

<sup>2,6</sup>Faculty of defense Strategy, Indonesia Defense University, Indonesia.

---

## Abstract

The National Education System in Indonesia is regulated by the Ministry of Education and Culture (Kemendikbud), that often facing reports from public sector concerning illegal charges or in Bahasa Indonesia is called Pungutan Liar (Pungli). Pungli in the context of providing education is contrary to the mandate of the Indonesian 1945 Constitution. This study discusses the substance of the rules, the parties involved and the effectiveness of policies to eradicate Pungli in the national education system. The purpose of this study is to uncover and evaluate government policies in preventing government officials from committing illegal levies. This study uses a qualitative method with an analytical descriptive approach. Data collection using interview, observation, and documentation techniques were analyzed using interactive model data analysis techniques. The results of this study indicate that the Government of Indonesia has attempted to eradicate Pungli by issuing Presidential Regulation No. 87 of 2016. The eradication of Pungli within the Ministry of Education and Culture as the regulator of the national education system is carried out through internal actors from the Ministry of Education and Culture itself and external actors, namely through the establishment of a Task Force called "Clean Sweep of Illegal Charges" "Sapu Bersih Pungutan Liar", in short Saber Pungli. The inhibiting factors in eradicating Pungli carried out by the Saber Pungli Task Force are the position of the Saber Pungli Task Force which is not a law enforcer, the absence of further regulations from the Presidential Regulation, the ineffectiveness of forming a Pungli eradication unit for Ministries/Institutions (K/L) and local governments (Pemda), concurrent positions of the Saber Pungli Task Force officials, and the lack of community participation. The solution offered to create effective policies in relation to eradicating Pungli in Indonesia is to establish more effective legislation, obliging every K/L and local government to establish Pungli Units within their institutions, strengthening the institution of the Saber Pungli Task Force, providing legal protection for whistle blowers. and/or witnesses, creating a whistleblowing system.

**Keywords:** Pungli, Ministry of Education and Culture, Saber Pungli Task Force, Effectiveness

---

## Introduction

The Corruption Eradication Commission (Komisi Pemberantasan Korupsi - KPK) stated that the National Integrity Index in 2021 was at a score of 72.4 out of 100, which was obtained from the Integrity Assessment Survey (Survei Penilaian Integritas - SPI) conducted by KPK and involving 98 Ministries/Institutions (Kementerian/Lembaga - K/L), 508 Regency Governments/Cities in 34 Provinces. The variables in the survey include questions about gratification/bribery/Pungli, abuse of office facilities, buying and selling positions, intervention, and corruption in the procurement of goods and services. The achievement of the Index has indeed exceeded the target of the 2020-2024 Medium-Term Development Plan, but is still far from the Index

100 which states very cleanliness from corruption. The difference of almost 30 indexes from clean from corruption indicates that the culture of corruption is still a system in the government system in Indonesia (Primadhyta, 2021).

The government system that functions to carry out educational services is a government function that is often in the public spotlight. One of the tasks of the State in this case is to regulate a budget allocation policy of 20% of the State Budget (Anggaran Pendapatan Belanja Negara - APBN) or Regional Budget (Anggaran Pendapatan Belanja Daerah - APBD) for education management as a form of embodiment of the nation's vision and commitment in addressing the importance of education for all circles and also quality education services for individual life and family life in society, nation and state. However, the policy for the provision of education and funding for the provision of education by the Government cannot be optimal due to the presence of individuals who abuse their authority in the administration of education.

The Ministry of Education and Culture (Kementerian Pendidikan dan Kebudayaan - Kemendikbud) as the nation's education regulator is one of the agencies most frequently reported by the public to make illegal levies (Pungli). (Mahmodin, 2021). The object of illegal levies (Pungli) in schools is not only done to parents/guardians or community members who deal with schools, but also targets students, teachers, and school principals. The Minister of Education and Culture said that one of the causes of alleged illegal levies (Pungli) in schools stems from the confusion of a number of school principals to finance school operational costs including teacher salaries. (Prodjo, 2020). The principal is the most effective chain in the school to become the object of illegal levies because of the high dependence of parents on the educational future of their children who are authorized by the principal.

Pungli in the provision of education does not reflect the mandate of the Preamble of the 1945 Constitution of the Republic of Indonesia (UUD 1945) Paragraph Four, which reads to protect the entire Indonesian nation and the entire homeland of Indonesia, promote public welfare, educate the nation's life and participate in carrying out world order that is based on independence, eternal peace, and social justice. (Wartoyo, 2016). Pungli is also not in accordance with the responsibilities of the government and society in the implementation of the national education system as regulated in Law Number 20 of 2003 concerning the National Education System. Article 5 paragraph (1), Article 6 paragraph (1), Article 11 paragraph (1), Article 11 paragraph (2), Article 34 paragraph (2), Article 49 paragraph (1), and Article 49 paragraph (2).

Pungli is clearly a violation and is not in accordance with legal norms and can be categorized as a criminal act of corruption. Corruption is a disease that must be met with massive or collective resistance. The crime of corruption is an extraordinary crime which has damaged the system of life both socially, economically, politically, and has also penetrated the education sector. In general, it is known that the existing Pungli modes in the education sector vary widely, where based on community reports the forms can be in the form of: re-registration form fees, new student donations, school uniform fees, school worksheets, enrichment modules, school book fees, tuition fees tutoring or additional lessons, practicum fees, extracurricular activities, cleaning and security fees, study tour fees, graduation fees, school development donations, and building renovations.

In order to overcome Pungli that threatens government agencies, especially in education sector, the Task Force for "Clean Sweep of Illegal Charges" ("Sapu Bersih Pungutan Liar" - Saber Pungli) has actually been formed through Presidential Regulation of the Republic of Indonesia Number 87 of 2016 (Perpres 87/2016), which was made as part of efforts to eradicate Pungli. The establishment of the Saber Pungli is ment as one of the efforts of implementing government policies in carrying out reforms in the legal sector, as proclaimed by President Joko Widodo who wants the eradication of Pungli to become a national movement that can be carried out effectively and massively. Through this policy, the government hopes to restore public trust,

provide justice and legal certainty, because Pungli has damaged the life of the community, nation and state, so it is necessary to have a firm, integrated, efficient eradication effort, and be able to create a deterrent effect. The purpose of implementing the Saber Pungli Task Force policy is to carry out the eradication of Pungli effectively and efficiently by optimizing the utilization of personnel, work units, and infrastructure facilities, both in ministries/agencies and local governments as well as inviting the active role of the community in increasing the law enforcement of Pungli. (Mumpuni & Makkasau, 2021).

Until 2021, there have been 11,256 public reports related to Pungli activities. (Mahmodin, 2021). There are at least 8,424 arrest operations with state financial losses throughout Indonesia. Evidence of illegal Pungli was collected as much as Rp. 320,383,208,582,-, as shown in the following table:

**Table-1 Case Achievements Handled by Saber Pungli Task Force**

Source: Research Processed Results

Number	Case Achievement	Sum	Evidence
1	Hand Capture Operation	8.424	Rp 320,4 Billion
2	Submitted by Law Enforcement Officers (APH) to the Regional Government Internal Supervision Officer (APIP)	256	Rp 298,6 Billion
3	Conducted Coaching / Administrative Sanctions	6.812	Rp 32 Million

Referring to the types of problems reported by the public related to Saber Pungli, the researchers described them in the following table:

**Table-2 Types of Problems That People Report to the Saber Pungli Task Force**

Source: Research Processed Results

Number	Types of Reported Problems	Percentage
1	Community Service	50 %
2	Education	20 %
3	Law	8 %
4	Staffing Licensing, Procurement of Other Goods and Services	2 %

Based on this background, researchers will discuss the effectiveness of implementing policies to eradicate illegal fees in the National education system in Indonesia, especially within the Ministry of Education and Culture. This paper also discusses the substance of the rules underlying the implementation of the Pungli eradication policy and the parties involved and the extent to which the effectiveness of the implementation of the Pungli eradication policy is applied to the implementation of the national education system.

**LITERATUR REVIEW**

This study uses Lawrence M. Friedman's Legal System Theory and the Concept of Policy Implementation. Friedman argues that the operation of law enforcement depends on three elements, namely legal substance, legal structure and legal culture. (Ginsburg, 2011). First, legal substance is made and carried out by the

legislature in the form of decisions, statutes, statutory regulations and regulations outside the law. The involvement of community participation in the formation of laws and regulations affects the effectiveness of the enforcement and implementation of these laws and regulations. Indonesia has many laws and regulations that apply and are promulgated. However, these regulations cannot be implemented. Second, the legal structure is the institutions and institutions that make and enforce laws such as the executive and legislature, the police, courts, prosecutors and other institutions. In Indonesia, there are many cases of corruption and illegal levies, it is proven that there are many unscrupulous government officials so that the law is difficult to enforce in order to achieve justice. Third, legal culture is the relationship between the culture of people's behavior and legal awareness. This legal culture, the behavior of the community is also influenced by customary norms or habits, religious norms and moral norms. Sometimes the habit of people who are not aware of the law by giving bribes and gratuities makes the law not work well.

The concept of Policy Implementation from the researchers as a new finding that the policy for the establishment of the Saber Pungli Task Force depends on the process of understanding the objectives, identifying targets, actors involved, inhibiting factors and solutions. The process of understanding goals by formulating ways to achieve goals and preparing infrastructure. Identify the target by choosing the right decision on the target. The actors involved are prepared with education and training as good law enforcers. The inhibiting factor is by looking for weaknesses and limitations why the law is difficult to enforce. The last step is to find solutions to overcome these weaknesses and limitations.

## **RESEARCH METHODS**

This study uses a qualitative method with an analytical descriptive approach to understand the phenomena experienced by research subjects with a post-positivism paradigm such as behavior, perception, motivation, action, and others holistically and by describing in the form of words and language, in a context. natural specialties and by utilizing various natural methods (Anggito, Albi; Setiawan, 2018).

The primary data sources in qualitative research are words and actions, the rest are secondary data such as documents. In this study, the sources of data are informants, documents, places, and events. The data collection method used in this research are interview, observation, and documentation. The data that has been collected was analyzed using interactive model data analysis techniques (Gora, 2019), namely the analytical method used for the analysis process of the data obtained in the field and moving reciprocally continuously during the research. The implementation is by using the Miles Huberman and Saldana Method in 2014 (Miles, Matthew B. Huberman, A Michael. Saldana, 2020), by integrating interactively and circularly between data collection, data condensation, data presentation/display, followed by verification and conclusions.

## **RESULTS AND DISCUSSIONS**

### **1. Overview of the Saber Pungli Task Force and Actors Involved Nationally and in Educational Environment**

In order to increase the effectiveness of eradicating Pungli, the President issued Presidential Decree 87/2016 and the Coordinating Minister for Political, Legal and Security Affairs issued the Kepmenko Polhukam No. 78/2016 concerning the Clear Sweeping Task Force for Illegal Charges (Setiawan, 2018). Presidential Decree 87/2016 appoints the Coordinating Minister for Political, Legal and Security Affairs to control and be responsible for the activities of the Saber Pungli Task Force, whose members are combination from nine Ministries and Institutions, namely: (1) Coordinating Minister for Political, Legal and Security Affairs; (2) Indonesian National Police (Polisi Republik Indonesia - POLRI); (3) Attorney General's Office of the Republic of Indonesia (AGO); (4) Ministry of Home Affairs (Kementerian Dalam Negeri - Kemendagri); (5) Ministry of

Law and Human Rights (Kementerian Hukum dan Hak Asasi Manusia - Kemenkumham); (6) Center for Financial Transaction Reports and Analysis (Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK); (7) Ombudsman of the Republic of Indonesia; (8) State Intelligence Agency (Badan Intelijen Nasional - BIN); (9) Indonesian National Army (TNI).

The Saber Pungli activity has the objectives of: (1) suspending the practice of Pungli carried out by state officials in providing services to the community; (2) the establishment of a change in the mindset of the state apparatus in public service with the principle of zero Pungli but still prioritizing excellent service; and (3) the establishment and creation of a firm attitude and public awareness of rejecting all forms of Pungli and complying with applicable regulations. In addition, Saber Pungli activities also have targets including: (1) public services; (2) export and import; (3) law enforcement; (4) licensing; (5) staffing; (6) education; (7) procurement of goods and services; (8) other Pungli activities that disturb the community.

The Saber Pungli Task Force has the task of carrying out the eradication of Pungli in an effective and efficient manner by optimizing the utilization of personnel, work units, and infrastructure, both in ministries/agencies and local governments (Setiyawan, 2018). In carrying out its duties, the Saber Pungli Task Force carries out the functions of intelligence, prevention, prosecution and justice. In carrying out its duties and functions, the Saber Pungli Task Force has the authority to: (1) develop a system for preventing and eradicating Pungli; (2) collect data and information from ministries/agencies and other related parties using information technology; (3) coordinate, plan, and carry out Pungli eradication operations; (4) carry out catching operations; (5) provide recommendations to the heads of ministries/institutions as well as the heads of regional governments to impose sanctions on perpetrators of Pungli in accordance with the provisions of laws and regulations; (6) provide recommendations for the establishment and implementation of the duties of the Saber Pungli Unit in every agency providing public services to the leadership of the ministry/institution and the head of the regional government; (7) carry out an evaluation of Pungli eradication activities.

Ministries/Institutions and Local Governments carry out eradication of Pungli in their respective work environments, by establishing an Pungli Eradication Unit located in the internal supervisory unit or other work units in their respective work environments. Establishment of a Pungli eradication Unit based on the recommendation of the Pungli Saber Task Force.

Pungli eradication units located in each Ministry/Institution and Local Government in carrying out their duties coordinate with the Saber Pungli Task Force. The controller or person in charge of the Saber Pungli Task Force reports the implementation of the Task Force's duties to the President at least 1 (one) time every 3 (three) months or at any time if necessary. The Chief Executive and Deputy Chief Executive have the task of coordinating the implementation of the work group's duties in carrying out hand-catching operations. The Chief Executive, Deputy Chief Executive, and the working group report the results of the implementation of tasks to the Controller/Responsible for the Saber Pungli Task Force in stages. Further provisions regarding the organizational structure, duties, and working procedures of expert groups, working groups, and secretariats are regulated by the Coordinating Minister for Political, Legal and Security Affairs.

Pungli Eradication in the National education system, especially in the Ministry of Education and Culture is carried out through internal and external actors who are still based on Presidential Decree 87/2016 (W, 2021). Internal actors consist of the Minister of Education and Culture as Person in Charge, Inspector General as Chief Executive, expert groups, and working groups (Adi, 2021). Then external actors are as regulated in Presidential Decree 87/2016, namely the National Police, Attorney General's Office, Coordinating Ministry for Political, Legal and Security Affairs, Ministry of Home Affairs, Ministry of Law and Human Rights, PPATK, Ombudsman of the Republic of Indonesia, state Intelligence Agency, and Indonesian National Army (TNI).

The public can also participate in eradicating Pungli, either directly or indirectly through electronic or non-electronic media. Community participation is carried out in the form of providing information, complaints, reporting, and/or other forms in accordance with the provisions of laws and regulations. Further provisions regarding procedures for community participation in eradicating illegal fees are regulated by the Coordinating Minister for Political, Legal and Security Affairs. All costs needed to carry out the task of the Saber Pungli Task Force are charged to the State Budget through the Coordinating Ministry for Political, Legal and Security Affairs Budget.

The results of this study indicate that the interaction between networks of actors in an effort to eradicate Pungli is very much needed because the task of the Saber Pungli Team is very complex and requires the cooperation of all parties. The coordination carried out is proven to help increase the results of a group's work, especially those carried out at an early stage. The implementation of the Pungli eradication policy is effective if there is a mutually bound relationship between actors and a strong network and is the key to the successful implementation of the Pungli eradication policy in the National education system. There are 4 networks in this interaction, namely (1) the first network is the Central Task Force; (2) the second network consists of seven Ministries/Institutions Illegal Charges Eradication Units (Unit Pemberantasan Pungutan Liar - UPP); (3) the third network is the 22 Provincial UPPs that have been formed; and (4) the fourth network is the Saber Pungli Task Force which has representatives in the regions.

The network of actors at different levels and organizations are bound to each other according to their networks and carry out tasks within their respective networks and cooperate with each other, both within and outside the network. The interplay of interplay between the actors does exist and the need is high because the task of the Saber Pungli Task Force Team is not easy in supervising the practice of Pungli through the implementation of intelligence, prevention, prosecution and justice units. These four major tasks are carried out with mutual relations, cooperation and coordination between actors. Each unit in carrying out its duties in accordance with the roles and duties of each working group.

The network of actors at different levels and organizations are bound to each other according to their networks and carry out tasks within their respective networks and cooperate with each other, both within and outside the network. The interplay of connection between the actors does exist and the need is high because the task of the Saber Pungli Task Force Team is not easy in supervising the practice of Pungli through the implementation of intelligence, prevention, prosecution and justice units. These four major tasks are carried out with mutual relations, cooperation and coordination between actors. Each unit in carrying out its duties in accordance with the roles and duties of each working group.

## **2. The substance of the rules underlying the Implementation of the Pungli Eradiction Policies in the National Education System**

The theory of the legal system according to Lawrence M. Friedman states that one of the indicators is the legal substance that contains the contents of the regulations. The substance of the rules that underlie the implementation of the Pungli eradication policy is Presidential Decree 87/2016, that was issued considering that Pungli practices are rampant and have damaged the order of social, national and state life. The government sees the need for strict, integrated, effective, efficient eradication efforts, and is able to create a deterrent effect on perpetrators of Pungli. In an effort to eradicate Pungli, the government considers it necessary to form a Saber Pungli Task Force.

In the education sector in particular, as Minister of Education and Culture Regulation No. 44 of 2012 concerning Collection and Contribution of Education Fees to Basic Education Units (Permendikbud 44/2012), basic education units organized by the Government, and/or local governments are prohibited from collecting education unit fees. The unit cost of education consists of investment costs, operating costs, tuition

assistance, and scholarships. Operational costs have been covered by the School Operational Cost Program (Biaya Operasional Sekolah - BOS) and investment costs are also the responsibility of the government, for example costs for building libraries, rehabilitating school buildings, therefore, public schools are prohibited from collecting fees. Therefore, public schools are prohibited from collecting fees. Schools run by the central or local government (state schools) are not allowed to charge students' guardians. This is as regulated in Law no. 20 of 2003 concerning the National Education System (UU 20/2003) and Permendikbud 44/2012.

However, this study found that illegal levies still occur, especially during the process of the new school year where many new students want to compete to enter certain schools. This condition is used by certain parties to seek additional money which researchers consider as part of a form of illegal levies. This is also supported by the results of interviews with members of the Saber Pungli Kemendikbud, Mr. Irian W as follows:

“We have several channels of information and data on Pungli reports from the public, namely the website <http://saberpungli.id>; SMS 1193 and call center 193...the average thing they complained about was illegal fees in schools such as admission fees, committee fees, student council fees, extracurricular fees, exam fees, re-registration fees, study tour fees, tuition fees, textbooks, money association, graduation fees, snack money, infaq money and many other forms....” (W, 2021)

Based on the interview, it can be seen that the mode of illegal levies occurs in schools in various forms, especially by using school committees to collect illegal levies.

The process of implementing policies for eradicating illegal levies runs smoothly if the substance of the rules that underlie policy implementation becomes the basis for policy effectiveness. The substance of the rules that underlie the implementation of the eradication of Pungli policies related to the Saber Pungli Task Force can be successfully carried out through the division of tasks and functions of intelligence, prevention, prosecution, and justice by optimizing the utilization of personnel, work units, and infrastructure, both in Ministries/Agencies and Government. area. Based on the explanation above, it can be seen that the substance of the rules that underlie the implementation of the policy to eradicate Pungli through Presidential Decree No. 87/2016 is appropriate because it is an instrument for the formation of the Saber Pungli Task Force Team in the educational environment, especially the Ministry of Education and Culture. The Saber Pungli Task Force has the task of carrying out the eradication of illegal levies effectively and efficiently by optimizing the utilization of personnel, work units, and infrastructure, both in Ministries/Agencies and local governments.

### **3. Factors Inhibiting the Implementation of Effective Policies in the Eradication of Pungli in the National Education System**

The concept of policy implementation under study includes the inhibiting factors. Efforts to prevent the practice of Pungli face obstacles that prevent efforts to anticipate illegal levies from running optimally. Obstacles faced by Saber Pungli in eradicating Pungli include:

1. The position of the Saber Pungli Task Force is not law enforcement; In Indonesia, traditionally the legal institutions that carry out law enforcement are the Police, the Prosecutor's Office, the Judiciary and Advocates. Outside these institutions, there are still the Directorate General of Customs and Excise, the Directorate General of Taxes, and the Directorate General of Immigration (Juwana, 2006). The position of the Saber Pungli Task Force, which is not a legal institution, causes the prosecution of Pungli practices to not run optimally because they cannot follow up on Pungli directly.
2. The absence of follow-up rules from Presidential Decree 87/2016; Since the beginning of the establishment of the Saber Pungli Task Force through Presidential Decree 87/2016, there have

been pros and cons, because its formation was not based on an adequate law, what actions fall into the Pungli category are also uncertain because they are not regulated by law. This is different from the KPK which was formed through Law No. 30 of 2002, which states that the basis is Law Number 31 of 1999 concerning the Eradication of Criminal Acts of Corruption. In addition, there is also the possibility of overlapping authority with the Ombudsman which is one of the authorized institutions to oversee public services in Indonesia.

3. The implementation of the establishment of an Pungli eradication unit for K/L and local governments that are less effective; Article 8 of Perpres 87/2016 stipulates that K/L and local governments carry out eradication of Pungli in their respective work environments. In carrying out the eradication of Pungli, K/L and local governments form a unit for eradicating Pungli. However, in reality, the implementation of the establishment of an Pungli eradication unit has not been widely carried out, and there are no consequences for not establishing an Pungli eradication unit.
4. Duplicate the positions of officers of the Saber Pungli Task Force; As stated in the previous section, the Saber Pungli Task Force is a combination of members from nine Ministries and Institutions, namely: (1) Coordinating Ministry for Political, Legal and Security Affairs; (2) the Indonesian National Police (Polri); (3) the Attorney General's Office of the Republic of Indonesia (AGO); (4) Ministry of Home Affairs (Kemendagri); (5) Ministry of Law and Human Rights (Kemenkumham); (6) Center for Financial Transaction Reports and Analysis (PPATK); (7) Ombudsman of the Republic of Indonesia; (8) State Intelligence Agency (BIN); (9) Indonesian National Armed Forces Military Police. Officials who received the mandate to serve in the Saber Pungli Task Force still carrying out their duties at their original agency. Of course, these officials will tend to prioritize the tasks of their original agencies because they are included in the assessment of key performance indicators. This causes the work carried out by the Saber Pungli Task Force to be ineffective. Another obstacle that arises in relation to dual positions is the emergence of sectoral egos. The potential for the emergence of sectoral egos in relation to the discovery of Pungli from the institution where the official concerned comes from, the tendency to not follow up on the report is also great.
5. The lack of community participation in preventing Pungli is due to the culture of Pungli which is considered a habit and is customary to do. In addition, there is also a lack of protection for people who report or are asked to be witnesses, which causes people to tend not to speak out against illegal Pungli practices that occur.

#### **4. Effectiveness of the Implementation Process of the Pungli Eradication Policies in the National Education System**

According to Friedman, the relationship between legal structure and the concept of policy implementation by researchers on the policy process with good implementation is the effective implementation. Sandfort and Moulton define effective implementation as a deliberate, institutionally approved change that is motivated by a policy or program directed at creating a public policy value result. When implementation is successful, it becomes part of the daily work and part of standard operating procedures. Effective implementation is intentional because it involves a conscious design, planning and judgment about what is happening. Effective implementation must also be institutionally approved, supported by political authorities and a pragmatic understanding of reasonable action in the face of obstacles in its operational arrangements. However, the implementation of a policy often undergoes a process of change that takes place in an unexpected way. There are a number of important indicators that can influence the effectiveness of implementation (Roll et al., 2017).



In implementing policies, lessons need to be learned and this can be a tool to increase the effectiveness of the implementation of a policy or program. Implementers of policies and programs in various social sectors must understand how to use science to help deal with unforeseen circumstances that may arise at any time. Policy practitioners must create problem-solving mechanisms by learning from changes that occur in implementation in complex systems/environments and also from changes caused by political influence (Sandfort & Moulton, 2020). According to Sandfort and Moulton, there are several principles to keep in mind when implementing implementation practices and measuring their effectiveness, namely:

1. Knowing the context in which you can influence change: the goals and resources of the people, the resources for the implementation, and the prevailing cultural values.
2. Create a core program package to introduce a policy (among others: options that are possible to implement, groups that can encourage change and coordination), and identify changes that can produce public value outcomes.
3. Face challenges with the adaptive techniques needed to create change, apply analytical inquiry, and use social skills to monitor public compliance. people, the help of its implementation, and the prevailing cultural values.

The effectiveness of the implementation of the policy of eradicating illegal levies is determined by internal factors, namely the perception of individuals and schools that do not comply with the rules that make this illegal Pungli practice occur, factors of opportunity, communication, resources, disposition, Standard Operating Procedures, and budgets as well as external factors, namely factors that govern regulations. It is unclear about the mechanism for collecting financing, punishment factors for perpetrators of illegal levies, low community participation in combating illegal levies in schools, and obstacles in collecting and storing evidence. The effectiveness of the policy implementation process for eradicating illegal levies carried out by the Saber Pungli Task Force Team from the central to the regions is seen from the various policy concepts. The process of implementing effective policies and programs requires changes in the operating system. When the system is able to change policies, organizations, implementers, ideas and new policy or program initiatives that are integrated into standard operating procedures and these changes are institutionalized, no longer seen as a new form then this is one of the essential implementation outcomes.

Illegal levies are very vulnerable to occur in school services in their daily lives. Facts shows that the public service in the education sector is still characterized by the practice of illegal fees due to complexity and uncertainty of existing services. The high level of uncertainty in public services as a result of long and tiring service procedures is the cause of more people giving up when dealing with corrupt public services. This is one of the factors that causes people tend to be more tolerant of illegal fees practice in the public services. The results of this study indicate that the policy implementation process of the Saber Pungli Task Force Team in the educational environment, especially the Ministry of Education and Culture is still constrained by various internal problems and external problems that need to be resolved.

## **5. Effective Pungli Eradication Implementation Solution**

The final step of the policy concept of researchers is to find solutions to overcome the inhibiting factors by looking for weaknesses and limitations which then leads for solutions. This study tries to provide a solution for the implementation of the eradication of illegal levies which still face several obstacles, both the institution of the Saber Pungli Task Force and its implementation at the Ministry of Education and Culture as the implementer of the National Education System. In this case, there are several solutions that can be offered to the Saber Pungli Task Force Team in eradicating Pungli in Indonesia:

1. Forming more effective legislation; As previously explained, the formation of the Saber Pungli Task Force in Perpres No. 87/2016 is not based on legislation so that it has weaknesses from the statutory aspect. Therefore, it is necessary to establish a legislation that specifically regulates the criminal act of Pungli and its implementation so that in its implementation later derivative laws can be formed that become a reference in eradicating Pungli.
2. Order every Ministry/Agency and Local Government to form a unit to eradicate illegal levies; The non-implementation of sanctions on agencies that do not form a unit for eradicating illegal levies has resulted in the ineffective implementation of the eradication of illegal levies in an agency. In connection with the first solution, a provision is needed which obliges a Ministry/Agency and Local Government to form a unit for eradicating illegal levies and the imposition of sanctions for those who do not form it and do not carry out the function of the unit as it should be.
3. Strengthening the institutions of the Saber Pungli Task Force; The status of the Saber Pungli Task Force, which is not a law enforcement agency, causes a complicated bureaucracy to follow up on reports of alleged illegal levies. So that it is necessary to strengthen the institution which consists of the authority of the institution and the official of the institution. Strengthening the authority of the Saber Pungli Task Force so that it becomes an effective institution in eradicating illegal levies can be through amalgamation with the KPK or Ombudsman institutions. This fusion can minimize the sectoral ego that may arise. Then regarding agency officials, it is necessary for officials or human resources to focus on carrying out their duties as the Pungli Saber Task Force Team, not officials who receive double duties from other agencies. This is important to do to strengthen the institutional structure of the Saber Pungli Task Force.
4. Provide legal protection for the reporter and/or witness; Community involvement in eradicating illegal levies is also important because most of the subjects affected by illegal levies are the community. However, the public's reluctance to report is often caused by the lack of legal protection for the community. Therefore, it is necessary to provide strong legal instruments for whistleblowers so that they do not backfiring if the complainant cannot prove his suspicions.
5. Order every Ministry/Agency and Local Government to establish a whistleblowing system. The whistleblowing system is a mechanism that is used by agencies in handling cases that store ethically (Satyasmoko & Sawarjuwono, 2020). It is expected that with the existence of a whistleblowing system, any allegations of illegal levies at an agency can be revealed and followed up by the Saber Pungli Task Force and the Pungli Eradication Unit at the agency.

The researchers believe that if the implementation solution of the Pungli eradication policy above is implemented, it can effectively prevent or take action against illegal levies that are rife in the national education system in particular or the government system in general.

## **CONCLUSION**

The Ministry of Education and Culture as the front line of the National education system is one of the agencies that are often reported by the public regarding illegal levies. The Government has made efforts to eradicate illegal levies by issuing Presidential Decree No. 87/2016 for the implementation of a firm, integrated, effective eradication of illegal levies, and creates a deterrent effect for the perpetrators. Presidential Decree No. 87/2016 is the basis for the formation of the Saber Pungli Task Force. Eradication of illegal levies within the Ministry of Education and Culture as the organizer of the national education system is carried out through internal actors from the Ministry of Education and Culture itself and external actors in the form of nine institutions appointed by Presidential Decree No. 87/2016 to eradicate illegal fees, namely the Coordinating

Ministry for Political, Legal and Security Affairs, Police, AGO, Ministry of Home Affairs, Ministry of Law and Human Rights, Center for Financial Transaction Reports and Analysis (Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK), Ombudsman Republic of Indonesia, State Intelligence Agency (Badan Intelijen Nasional - BIN), and the Indonesian National Army (TNI).

Obstacles in implementing effective policies on eradicating illegal levies carried out by the Saber Pungli Task Force are: its position that has no law enforcement, the absence of further regulations from Presidential Decree No. 87/2016, the ineffectiveness of establishing an Pungli eradication unit for K/L and local governments, concurrent positions officials of The Saber Pungli Task Force and the lack of community participation.

In the national education system, the practice of Pungli is still happening. The implementation of eradicating Pungli in the educational environment, especially the Ministry of Education and Culture is still constrained by internal and external problems that need to be resolved. Internal factors in the form of individual perceptions, opportunities, communication resources, disposition, operational standards and budget. External factors in the form of unclear regulatory factors related to the mechanism for collecting financing, punishment factors for Pungliists, low community participation in combating Pungli practices in schools, and obstacles in collecting and storing evidence. The solution for effective policy implementation in relation to eradicating Pungli in Indonesia specifically at the Ministry of Education and Culture is to establish more effective legislation, requiring every K/L and local government to form Pungli units in their institutions, strengthening the institution of the Saber Pungli Task Force, providing legal protection for reporters and/or witnesses, creating a whistleblowing system.

## REFERENCES

1. Adi, W. (2021). Interview Outcome Mr Wahyu Adi.
2. Anggito, Albi; Setiawan, J. (2018). Metodologi Penelitian. In E. D. Lestari (Ed.), Metodologi Penelitian Kualitatif (p. 174). CV Jejak. <https://books.google.co.id/books?id=59V8DwAAQBAJ&printsec=frontcover&hl=id#v=onepage&q&f=false>
3. Ginsburg, T. (2011). Lawrence M. Friedman's comparative law. *Law, Society, and History: Themes in the Legal Sociology and Legal History of Lawrence M. Friedman*, August, 52–64. <https://doi.org/10.1017/CBO9780511921629.005>
4. Gora, R. (2019). Detail Buku Riset Kualitatif Public Relations. <https://jakad.id/toko-buku/detail/?q=riset-kualitatif-public-relations>
5. Juwana, H. (2006). Penegakan Hukum dalam Kajian Law and Development: Problem dan Fundamen bagi Solusi di Indonesia. *Indonesian Journal of International Law*, 3(2). <http://journal.ui.ac.id/index.php/IJIL/article/viewFile/2801/2182>
6. Mahmodin, M. M. (2021). Biro Hukum, Persidangan, dan Hubungan Masyarakat Kemenko Polhukam. <https://polkam.go.id/biro-persidangan-hubungan-kelembagaan/>
7. Miles, Matthew B. Huberman, A Michael. Saldana, J. (2020). *Qualitative Data Analysis* (pp. 3–12). [https://us.sagepub.com/sites/default/files/upm-assets/110621\\_book\\_item\\_110621.pdf](https://us.sagepub.com/sites/default/files/upm-assets/110621_book_item_110621.pdf)
8. Mumpuni, N. W. R., & Makkasau, A. M. A. (2021). Satgas Saber Pungli Dalam Penanggulangan Pungutan Liar Di Provinsi Daerah Istimewa Yogyakarta. *Literasi Hukum*, 5(1), 104–123. <https://jurnal.untidar.ac.id/index.php/literasihukum/article/view/3932>

9. Primadhyta, S. (2021). KPK: Indeks Integritas Nasional 72,4, Belum Berarti Banyak. <https://www.cnnindonesia.com/nasional/20211224035219-12-738083/kpk-indeks-integritas-nasional-724-belum-berarti-banyak>
10. Projo, W. A. (2020). Nadiem: Kepala Sekolah Meminjam Uang dari Orangtua Siswa, Muncullah Banyak Pungli. Kompas.Com, 1–8. <https://edukasi.kompas.com/read/2020/02/14/18591481/nadiem-kepala-sekolah-meminjam-uang-dari-orangtua-siswa-muncullah-banyak?page=all>
11. Roll, S., Moulton, S., & Sandfort, J. (2017). A comparative analysis of two streams of implementation research. *Journal of Public and Nonprofit Affairs*, 3(1), 3–22. <https://doi.org/10.20899/jpna.3.1.3-22>
12. Sandfort, J. R., & Moulton, S. (2020). Replication or Innovation? Structuration in Policy Implementation. *Perspectives on Public Management and Governance*, 3(2), 141–154. <https://doi.org/10.1093/ppmgov/gvz029>
13. Satyasmoko, A., & Sawarjuwono, T. (2020). Sistem Whistleblowing dalam Penanganan Kasus Penyelewengan Etika. *Jurnal Akuntansi Dan Pajak*, 22(1), 1–18. <http://jurnal.stie-aas.ac.id/index.php/jap>
14. Setiyawan, W. (2018). Efektivitas Satuan Tugas Sapu Bersih Pungutan Liar (Satgas Saber Pungli) Dalam Penanggulangan Tindak Pidana Pungutan Liar (Studi Kasus di Satgas Saber Pungli Kabupaten Karanganyar) [Universitas Muhammadiyah Surakarta]. In Fakultas Hukum Universitas Muhammadiyah Surakarta (Vol. 11, Issue 1). [http://eprints.ums.ac.id/59231/12/HALAMAN\\_DEPAN.pdf](http://eprints.ums.ac.id/59231/12/HALAMAN_DEPAN.pdf)
15. W, I. (2021). Interview Outcome Mr Irian W.
16. Wartoyo, F. X. (2016). Tanggung Jawab Hukum Pemerintah Dalam Penyelenggaraan Pendidikan Nasional. *Yustisia Jurnal Hukum*, 5(1), 216–230. <https://doi.org/10.20961/yustisia.v5i1.8734>