

Research Paper

The Regulation of the Minister of Higher Education, Science, and Technology No. 39/2025: Harmonization of the Internal Quality Assurance System Instruments at UPN 'Veteran' Yogyakarta

Johan Danu Prasetya*, Dian Indri Purnamasari, Barlian Dwinagara, Tedy Agung Cahyadi, Aldin Ardian

Universitas Pembangunan Nasional Veteran Yogyakarta, Indonesia

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Abstract

This study formulates a harmonization model for UPN "Veteran" Yogyakarta's SPMI instruments based on Permendiktisaintek 39/2025, synchronizing internal standards, BAN-PT/LAM/international accreditation criteria, and data governance via PANDU to accelerate evidence-based continuous improvement through the PPEPP cycle. The research employs a literature review of current regulations (Law 12/2012, SN Dikti, Permendiktisaintek 39/2025, BAN-PT/LAM instruments), followed by FGDs. The sample included: department heads from all faculties; faculty-level academic affairs leads; certified internal assessors affiliated with BAN-PT, LAMTEK, LAMEMBA, and LAMSPAK; LPPM representatives for research and learning services; and UPA TIK staff responsible for PANDU and data integration, ensuring role-diverse perspectives on standards, evidence, and system requirements. Primary data focused on gaps, redundancies, feasibility, and migration needs from legacy instruments (2017, 2020, 2022) to post-Regulation 39/2025 indicators. Qualitative content analysis was applied to policy texts, accreditation instruments, and FGD/Monitoring and Evaluation materials to derive themes, indicators, and evidence specifications aligned to outcomes- and impact-oriented criteria used by BAN-PT/LAM. The study presents an SPMI-SPME synchronization model that is "beyond standards," operationalizing evidencebased PPEPP and linking Additional Performance Indicators to outcome- and impact-based accreditation indicators. Initial implementation indicates institutional readiness through PANDU and data integration, alongside UPNVY's program accreditations, which are primarily rated as Excellent/Very Good, as well as international accreditations (FIBAA, ACCA). The model provides a two-year transition roadmap to update SPMI/SPME regulations, refresh audit and monitoring instruments in PANDU, identify gaps in relation to BAN-PT/LAM/international criteria, and coordinate data for accountability and continuous quality enhancement.

Keywords Higher Education Quality Assurance, Internal-External Quality Assurance, PANDU, BAN-PT, LAM, International Accreditation

INTRODUCTION

Driven by a strong national regulatory framework established since the early 21st century, quality assurance has emerged as a key tenet in Indonesia's transformation of higher education. Law No. 12 of 2012 on Higher Education firmly establishes accreditation as a mandatory operational requirement with significant legal implications and as a tool for evaluation. Every higher education institution is required by Article 93 to establish a systematic, documented, and ongoing quality assurance system, as noncompliance with accreditation requirements can result in administrative and even criminal penalties.

From the Ministry of Education, Culture, Research, and Technology (Permendikbudristek) Regulation No. 53 of 2023 to the most recent Ministry of Higher Education , Science, and Technology (Permendiktisaintek) Regulation No. 39 of 2025, several transformative policies have strengthened this dynamic. The accreditation environment has changed in tandem with these regulatory changes. According to the Accreditation 4.0 framework, the National Accreditation Agency for Higher Education (BAN-PT) and other Independent Accreditation Bodies (LAM) now

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use instruments focused on outcomes and evidence-based performance. Higher education institutions must now emphasize the inputs, procedures, and accomplishments, as well as the significance and applicability, of their curricula in light of this change. Additionally, robust and integrated data governance is required due to digitalization via platforms such as the Online Higher Education Accreditation System (SAPTO) 2.0 and automated monitoring systems based on data from the Science and Technology Index (SINTA) and the Higher Education Database (PD-Dikti).

This study aims to develop a model for modifying accreditation tools within the SPMI at UPNVY, utilizing its internal information system, PANDU. This study aims to provide practical contributions for UPNVY and serve as a reference for other higher education institutions in navigating the increasingly dynamic and globally oriented quality assurance landscape by focusing on the synchronisation of internal standards, external accreditation criteria, and digital data readiness as mandated by Regulation No. 39/2025.

LITERATURE REVIEW

Higher Education Quality Assurance

Quality assurance is a series of structured, coordinated, integrated, and continuous activities applied in quality management to ensure that all processes follow established quality standards and regulations (Husaini, 2006). In its implementation, quality assurance also ensures the achievement of the institution's vision, mission, and goals through a continuous evaluation process. This concept is rooted in a quality management approach that prioritizes strategic planning, structured implementation, systematic evaluation, and follow-up based on real data and evidence.

Higher education quality assurance, as stipulated by the Minister of Higher Education, Science, and Technology Regulation No. 39 of 2025, is a systematic action to improve the quality of higher education in a planned and sustained manner. This regulation, which revokes and replaces Permendikbudristek No. 53 of 2023, clarifies the responsibility of universities to ensure that all educational processes not only comply with the National Higher Education Standards (SN-Dikti) but also exceed those standards by adopting best practices and international quality standards.

According to Padila and Walit (2023), quality assurance and improvement in education require clearly defined quality standards executed within a strategic and collaborative work structure and carried out continually. Generally, quality assurance is separated into two primary components: the Internal Quality Assurance System (IQAS) and the External Quality Assurance System (EQAS).

- 1. The Internal Quality Assurance System (IQAS) is a system built and implemented independently by universities.
- 2. The External Quality Assurance System (SPME) is a quality evaluation process conducted by external parties such as BAN-PT and the Independent Accreditation Agency (LAM).

The foundation of the Internal Quality Assurance System (IQAS) is the PPEPP cycle (Planning, Implementation, Evaluation, Control, and Improvement), which serves as the primary mechanism for achieving sustainable higher education quality (Kemendikbudristek, 2023). The PPEPP cycle (Planning, Implementation, Evaluation, Control, and Improvement) is derived from Total Quality Management (TQM).

National Policy on the Quality of Education

Law Number 12 of 2012 concerning Higher Education remains the primary legal foundation for the administration of higher education in Indonesia. Articles 52–54 stipulate that quality assurance is a systematic effort to enhance the quality of higher education in a planned and sustainable manner. This law establishes accreditation as a critical instrument for measuring and

guaranteeing the quality of universities and their academic programs.

The regulatory framework has evolved significantly, culminating in the issuance of the Ministry of Higher Education, Science, and Technology Regulation No. 39 of 2025 concerning Higher Education Quality Assurance. This new regulation, which revokes the preceding Ministry of Education, Culture, Research, and Technology Regulation No. 53 of 2023, signals a strategic repositioning of the national quality assurance paradigm. While retaining the core principles of an Internal Quality Assurance System (SPMI) and an External Quality Assurance System (SPME), Regulation No. 39/2025 places strong emphasis on global competitiveness, international standards, and institutional accountability.

This updated policy reinforces the role of the PPEPP (Establishment, Implementation, Evaluation, Control, and Enhancement) cycle as the driving force behind SPMI. Significant changes introduced or strengthened by Regulation No. 39/2025 include: An explicit push for interanational accreditation and global benchmarking—mandatory institutional support for flexible learning pathways, including Recognition of Prior Learning (RPL) and micro-credentials. The integration of digital Technology is not just for reporting (e.g., SAPTO) but as a fundamental component of teaching, learning, and quality management.

Comparison of Accreditation Quality Assurance Systems in Education: International Vs Indonesia

This document provides a comparative overview of international (global or cross-border) quality assurance and accreditation systems in comparison to the Indonesian national accreditation and quality assurance system in education.

Table 1. Key Concepts & Frameworks on International / Global QA & Accreditation Indonesian National QA & Accreditation

International / Global QA & Accreditation	Indonesian National QA & Accreditation		
Ensure comparability, recognition, and quality	Ensure institutions meet national		
across borders; promote continuous improvement	standards; enhance quality, accountability,		
and accountability globally.	and public trust domestically.		
Use international reference frameworks such as	Use Standar Nasional Pendidikan (SNP)		
ESG, INQAAHE, or UNESCO guidelines.	and Standar Nasional Pendidikan Tinggi		
	(SN Dikti).		
Institutional accreditation, program accreditation,	Internal quality assurance (SPMI) and		
external review, and peer review.	external accreditation (SPME) by BAN-PT		
	or LAM.		
Independent, cross-national or regional (e.g.,	National bodies: BAN-PT and LAM.		
FIBAA, AQAS, QAA, EQUIS).			
Often voluntary, pursued for prestige and	Mandatory for all institutions and		
recognition.	programs.		
Emphasizes internationalization, benchmarking,	Focuses on compliance with national		
and stakeholder expectations.	standards and governance.		
Self-assessment, peer review, site visits,	Self-evaluation, external review by panels,		
continuous monitoring, reaccreditation.	site visits, and reaccreditation.		
Typically, 5 years, with interim reviews.	Similar periodic reaccreditation based on		
	BAN-PT or LAM rules.		
More institutional autonomy; accrediting bodies	Government-regulated through Ministry		
independent of government.	and national standards.		
Source: Data Proceed (2025)			

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Specific Differences and Challenges

- 1. Alignment with International Standards vs Local Context International systems adopt flexible meta-standards, while Indonesia applies national legal and cultural standards.
- 2. Capacity and Resources International accreditation demands higher institutional capacity; many Indonesian institutions face resource challenges.
- 3. Mutual Recognition International systems enable cross-border recognition; Indonesia's system remains nationally recognized.
- 4. Criteria Emphasis International accreditors emphasize global relevance and innovation, whereas Indonesia prioritizes national curriculum and compliance.
- 5. Flexibility vs. Rigidity International systems allow for contextual adaptation, whereas national standards are more prescriptive.

International accreditation and quality assurance systems focus on global standards, recognition, and benchmarking to ensure consistency and excellence. In contrast, the Indonesian system emphasizes compliance with national standards through a structured internal framework (SPMI) and an external framework (SPME).

Digital Transformation and Quality Assurance Information Systems.

Digital transformation in higher education quality management is a national priority, aligning with the Ministry of Education, Culture, Research, and Technology's policy to strengthen quality information systems. The need for efficiency, data accuracy, process transparency, and the demands for integration with national systems drive this development.

Universitas Pembangunan Nasional "Veteran" Yogyakarta (UPNVY) responded to this development by developing the PANDU application system. This application will continue to be developed by adding new features or modules to support the preparation of Monitoring and Evaluation (Monev) instruments, Internal Quality Audits (AMI), and integration with external databases such as PDDikti and SINTA.

Development of Accreditation Instruments in Indonesia.

Accreditation instruments in Indonesia have undergone a significant transformation in the last two decades. Previously, there was only one central institution, BAN-PT (National Accreditation Board for Higher Education). Currently, the accreditation process is tailored to the field of study through the establishment of the Independent Accreditation Agency (LAM)



Figure 1. Logo of BAN-PT and LAM

The Independent Accreditation Agency (LAM) was established as the implementing body for accreditation that is more specific and aligned with the field of study. The BAN-PT Accreditation Instrument adopts a performance-based (outcome-based) and evidence-based approach. The accreditation data from UPNVY shows that out of a total of 34 study programs, 15 study programs (44.12%) have successfully achieved an Excellent rating, 9 study programs (26.47%) Very Good, 5 study programs (14.71%) Good, and the remaining programs are in categories A and B, which were the old categories before BAN-PT and LAM changed the accreditation system.

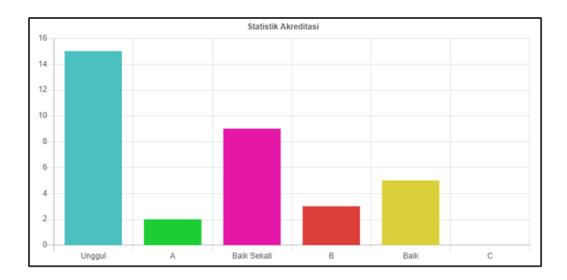


Figure 2. Statistics on the Accreditation Status of UPNVY Study Programs

The Strategic Role of LPMPP in Quality Assurance

The LPMPP (Institute for Quality Assurance and Learning Development) at Universitas Pembangunan Nasional "Veteran" Yogyakarta (UPNVY) is a strategic unit in implementing SPMI. Based on the Minister of Research, Technology, and Higher Education Regulation No. 20 of 2024, the LPMPP is tasked with developing, implementing, and evaluating the higher education quality assurance system. This task includes conducting Internal Quality Audits (IQAs), Monitoring and Evaluation (M&E), and inter-unit coordination to ensure the fulfillment of accreditation indicators.

LPMPP is also responsible for developing quality support systems based on information technology, such as the PANDU system. Through this system, documentation of SPMI implementation, PPEPP reporting, and quality audits can be done digitally and integrated. Developing new modules for this system is one of the important agendas for adapting to the latest regulatory developments and accreditation instruments.

RESEARCH METHOD

This research method primarily focuses on a literature review related to various fundamental developments in the legal regulations governing stakeholders regarding the accreditation process, including BAN PT and LAM (Kusnadi et al., 2022; Rahardjo & Nugroho, 2023). Confirmation methods through Focus Group Discussions (FGDs) and Monitoring and Evaluation (M&E) related to changes in instruments within various quality assurance processes, which are the responsibility of LPMPP, were conducted with various external and internal resource persons (Sari & Prasetyo, 2023).

FGD participants were selected through purposive sampling to capture decision-making authority, operational ownership of quality processes, and data stewardship across units most impacted by instrument harmonization (Creswell & Poth, 2018; Miles et al., 2020). The sample included: department heads from all faculties; faculty-level academic affairs leads; certified internal assessors affiliated with BAN-PT, LAMTEK, LAMEMBA, and LAMSPAK; LPPM representatives for research and learning services; and UPA TIK staff responsible for PANDU and data integration, ensuring role-diverse perspectives on standards, evidence, and system requirements (Setyowati & Hidayat, 2022).

Primary data focused on gaps, redundancies, feasibility, and migration needs from legacy instruments (2017, 2020, 2022) to post–Regulation 39/2025 indicators. Qualitative content

analysis was applied to policy texts, accreditation instruments, and FGD/Monitoring and Evaluation materials to derive themes, indicators, and evidence specifications aligned to outcomes- and impact-oriented criteria used by BAN-PT/LAM (Mayring, 2019; Elo & Kyngäs, 2021; Nurdin & Usman, 2020).

FINDINGS AND DISCUSSION

Regulation of the Minister of Higher Education, Science, and Technology No. 39/2025 shifts the focus of quality assurance from meeting minimum standards to exceeding them globally. This is shown by the creation of the Ministry of Higher Education, Science, and Technology, which focuses its policies on international competitiveness, flexible curricula, and data-driven accountability. The National Higher Education Standards remain the most important, but each university must establish its own standards that exceed these national standards. These standards must include RPL, micro-credentials, and modular-distance learning models that can be used across programs, campuses, and countries. At the same time, the Internal Quality Assurance System – External Quality Assurance System is confirmed as the backbone of the quality ecosystem, with audits and evaluations that are more open, and the National Higher Education Database is used for decision-making and ranking. Strong support also exists for international accreditation, global research collaboration, and academic mobility.

The curriculum is focused on global competencies—21st-century skills, digital literacy, and adaptive abilities—that connect learning outcomes with the needs of industry and the cross-border labour market. BAN-PT and LAM continue to conduct accreditation and open pathways for "excellent" recognition and cross-country recognition, ensuring that the quality of Tridharma outputs is regulatory valid and measurable in its impact. The end of Ministerial Regulation 53/2023 on September 2, 2025, marks the start of the transition period. During this time, all internal campus policies must be updated within two years. This will require faster digital transformation, new learning outcomes, and the building of international networks as conditions for long-term quality.

The National Higher Education Standards (SN Dikti) are based on Regulation of the Minister of Higher Education, Science, and Technology No. 39/2025

SN Dikti are a mission-based strategic framework that aligns national education goals with global competitiveness through four main goals: creating a bright and long-lasting higher education governance structure that promotes science and Technology; making sure that there is a practical, inclusive, and adaptable ecosystem that can keep up with the changes in science and society; making sure that the best human resources are produced; and encouraging a culture of quality improvement that goes above and beyond standards. All four are binding since all universities must meet the National Higher Education Standards, the national quality baseline, and the basis for incorporating the Three Pillars of Higher Education (Tridharma) into their policies. SN Dikti consists of: a. national education standards; b. research standards; and c. community service standards.

Table 2. Structure of National Education Standards in Higher Education.

Standard	Subcomponents	Core Description
Group	-	•
Education output standards	Graduate competency standards	Establishes the minimum criteria for graduate competencies as the final learning outcomes of a study program.
Education process	Learning process standards	Regulates the planning, delivery, and modalities of instruction to achieve graduate competencies.
standards	Assessment standards	Sets the principles and mechanism for assessing student learning outcomes.
	Management standards	Specifies planning, implementation, supervision, and control of educational activities.
Education input	Content standards	Defines the scope of learning materials aligned with program learning outcomes
standards	Standards for lecturers and education personnel	Sets qualification and competencies for lecturers and education staff.
	Facilities and infrastructure standards	Specifies adequacy of facilities, access to ICT, and learning resources.
	Financing standards	Defines components and governance of education financing.

Source: Data Proceed, (2025)

Synchronisation of Internal Quality Assurance Standards of UPNVY

The internal quality assurance standards for higher education at Universitas Pembangunan Nasional "Veteran" Yogyakarta (UPNVY) consist of SPMI and SPME. The UPNVY SPMI is designed, implemented, assessed, controlled, and developed by UPN "Veteran" Yogyakarta. SPME UPNVY is planned, reviewed, executed, managed, and developed by BANPT, and/or LAM, as well as International Institutions through Accreditation in compliance with their respective authorities. The planning, implementation, evaluation, control, and development of SPMI and SPME are based on the National Higher Education Standards.

There is a shift in the orientation of quality assurance, as outlined in Regulation of the Minister of Higher Education, Science, and Technology No. 39/2025, from meeting minimum standards to exceeding them globally. SPMI UPNVY has met the elements of this change in quality assurance orientation, as evidenced by the existence of regulations regarding additional performance indicators (IKT). IKT UPNVY provides standards that exceed worldwide norms, with the following provisions: a minimum TOEFL score requirement, setting a target number of international students, enhancing the quality of lecturers, improving curriculum quality on a global scale, and enhancing institutional governance.

Synchronisation of External Accreditation Criteria of UPNVY

External Accreditation Criteria of UPNVY referring to BAN-PT (National Accreditation Board for Higher Education) and Independent Accreditation Agency (LAM). Regulation of the Minister of Higher Education, Science, and Technology No. 39/2025 stipulates that BAN-PT and LAM are responsible for accrediting study programs and universities. However, international accreditation has been added to the external quality assurance orientation. Based on these regulations, universities must prepare accreditation instruments in accordance with global standards. SPME of UPNVY is established through the Rector's Regulation of the Universitas Pembangunan Nasional "Veteran" Yogyakarta, Number 1 of 2022. External quality assurance orientation, as defined by international accreditation standards, has been established in the rector's regulation. Rector

UPNVY Regulation states that SPME is planned, evaluated, implemented, controlled, and developed by BANPT, and/or LAM, and international institutions through accreditation per their respective authorities. The establishment of this international accreditation orientation is in line with Regulation No. 39/2025 of the Minister of Higher Education, Science, and Technology. UPNVY has also received international accreditation from the Foundation for International Business Administration Accreditation (FIBAA) for all study programs in the Faculty of Social and Political Sciences (FISIP), as well as international accreditation from the Association of Chartered Certified Accountants (ACCA) for the accounting study program.

CONCLUSIONS

UPNVY has prepared the prerequisites for harmonization through LPMPP and the PANDU system, with an agenda for developing AMI modules, Monev, and integrating PD-Dikti/SINTA, so that SPMI documentation has shifted from administrative to data-driven management; this serves as the foundation for synchronizing internal standards, external accreditation criteria (BAN-PT/LAM/international), and digital reporting readiness. Evidence of capability is seen in the predominantly "Excellent/Very Good" accreditation achievements of study programs and the acquisition of international accreditations (e.g., FIBAA, ACCA) in specific units. The main practical implications are: (a) reestablishing internal standards aligned with SN Dikti but targeted for exceeding (global competencies, micro-credentials, RPL, modular-distance learning); (b) strengthening the PPEPP cycle with evidence-based audits that directly link to curriculum and resource improvement; (c) consolidating integrated data governance for accreditation (SAPTO/equivalent), ranking, and strategic decisions; and (d) sharpening internationalization strategies (global accreditation, academic mobility, research collaboration) through measurable ICT design.

LIMITATIONS & FURTHER RESEARCH

This study's evidence base is bounded by a qualitative–documentary design centered on purposively selected internal stakeholders (department leaders, faculty academic affairs, internal assessors, LPPM, and UPA TIK) and institutional/regulatory documents, which may constrain representativeness and external generalizability beyond UPNVY's context and governance structures. There is a need to expand stakeholder coverage by incorporating student, alumni, employer, and external reviewer panels to test the relevance, burden, and clarity of evidence across user groups, thereby improving validity and transferability across faculties and institutions.

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