



Strategy for Evaluation of Quality Assurance System Implementation Policies in Increasing the Competitiveness of Private Universities in the City of Bandung

¹Agus Supriatna, ²Benyamin Harits, ³Yaya Mulyana Abdul Azis

Universitas Pasundan, Bandung, West Java, Indonesia

*e-mail: asupriatna@gmail.com

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ABSTRACT

The implementation of the Quality Assurance System for Private Universities in the City of Bandung is currently still not effective, in the sense that the implementation of the quality assurance system is not fully in accordance with the quality instruments set by the government. The focus of this research is Policy Evaluation in the implementation of the Quality Assurance System for Private Higher Education in the City of Bandung. The sub-focus of this research is the dimensions that need to be carried out in evaluating quality assurance system implementation policies, namely: administrative evaluation, judicial evaluation and political evaluation. This research uses a qualitative descriptive analysis method and is supported by the SWOT technique. This was chosen with the consideration that actual data can be obtained, being able to study the research problem in depth so that results can be obtained that are in line with expectations. The results of the research show that the implementation of the Quality Assurance System for Private Higher Education in the City of Bandung is still not effective, so policy evaluation is needed through (1) Administrative evaluation taking into account: Effort Evaluation, Performance Evaluation, Adequacy of Performance, Efficiency Evaluation and Process Evaluation, (2) Judicial evaluation by paying attention to: Issues of legal validity, Possible Violations of the Constitution, Possible Violations of the Legal System, Possible Violations of Ethics and State Administration Rules, (3) Political evaluation by paying attention to: Political Process in determining policies, Acceptance of political constituents towards public policies, Implementation Information Technology. The results of the policy evaluation in this research then produced a recommendation strategy regarding the implementation of a higher education quality assurance system that is in accordance with government standards.

Keywords: Policy Evaluation, Quality Assurance System, Implementation Strategy

INTRODUCTION

Providing education is the government's task to achieve national goals in order to make the nation's life more intelligent, one of which is through the provision of higher education (Agus, 2012). Higher education as part of the national education system has a strategic role in increasing the nation's competitiveness in facing the impact of globalization in all areas of life. Therefore, the implementation of higher education is required to be able to develop science and technology and produce graduates who have quality, professional and creative competencies. So, college graduates are able to take part in society and contribute to the empowerment of the nation and the progress of sustainable development (Riswandha, 2002).

According to Yaremiyas (2008), the education quality assurance system policy mandates the government to supervise and help improve the quality and competitiveness of higher education by conducting assessments through the quality assurance system implemented by the National Accreditation Board for Higher Education (BAN-PT). This quality assurance system is then based on BAN-PT Regulation Number 1 of 2020 concerning Accreditation Mechanisms for Accreditation carried out by BAN-PT. Assessment using a quality assurance system, there are three categories of tertiary accreditation assessment, namely accreditation grades A (excellent), B (Good Once), and an accreditation grade of C (Good). To obtain this accreditation score, each university, both state universities (PTN) and private universities (PTS), compete to get the best score.

Meanwhile, the research results of James & Stewart (2000) stated that accreditation assessments have consequences for the future of graduates produced by a higher education institution. Generally, graduates are unable to compete (administratively) if the university where they study receives an accreditation score of C. The public and the world of work consider that an accreditation score of C indicates that the quality of the higher education institution is of poor quality, so that the competence of the graduates is doubtful. In the journal Ma'arif & Tanjung (2003) stated that assessing the quality of graduates based on accreditation results is actually less relevant, because assessing a person's quality is based more on a person's knowledge, skills and competence, not just measured by the university's accreditation score alone. Misconceptions regarding higher education accreditation assessments in society are of course very detrimental to institutions and graduates. In fact, according to the law, universities that receive an accreditation grade of C are still legally able to issue diplomas, because the accreditation grade of C is still included in the quality assessment in the 'good' category.

Private Higher Education Coordination, abbreviated as Kopertis, is a government institution that specifically develops private higher education institutions based on their work area. Currently, in accordance with the Regulation of the Minister of Research, Technology and Higher Education of the Republic of Indonesia number 15 of 2018 concerning the Organization and Work Procedures of Higher Education Service Institutions, in 2018 Kopertis changed its name to Higher Education Service Institution (LLDIKTI), Junkto Regulation of the Minister of Education and Culture Number 34 of 2020 concerning the Organization and Work Procedures of Higher Education Service Institutions. The Higher Education Service Institute (LLDIKTI) in its function as implementing the facilitation of tertiary education readiness in external quality assurance in its working area includes 450 private higher education institutions consisting of universities, academies, community colleges, high schools, institutes and polytechnics (Dwidjowijoto, 2007) .

Apart from private universities, state universities have now become the scope of work of Higher Education Service Institutions (LLDIKTI). However, in this research the researcher will focus on facilitating external quality assurance of private universities in the work area of the Higher Education Service Institute (LLDIKTI) region IV West Java and Banten.

Table 1. Recap of Higher Education in Region IV West Java and Banten

No	Form	Amount
1	University	94
2	Institute	16
3	High School	207
4	Academy	88
5	Polytechnic	40
6	Community Academy	5
Total		450

Source: LLDikti, 2021

Based on the number of private universities in the Kopertis IV area of West Java, there are institutions that are accredited and quite a few higher education institutions that are not yet accredited. Currently, according to data from Kopertis IV West Java / LLDIKTI IV there are 450 higher education institutions (private). Of the total number, there are 154 universities that have not

been accredited and 143 universities that are still accredited C. This shows that the implementation of the national quality assurance system policy has not been able to improve the quality of private universities, especially in the former Kopertis IV West Java/LLDIKTI IV area.

The results of Wayne's research (2011) explained that private universities should be seen as government partners in helping to provide affordable educational services for the entire community. However, in reality, in providing higher education, private universities rely on their own efforts so that they can have the same quality as state universities and established private universities. The burden on private universities is increasing with the implementation of the quality assurance system policy. In fact, the quality assurance system policy has not succeeded in improving the quality of higher education, but can give rise to new problems, including the potential to kill higher education institutions (especially small private universities and regional private universities) and harm graduates from being able to compete in the world of work (Edward, 2006).

According to Micel (2001), private universities (PTS) are actually government partners in advancing education in order to achieve one of the national goals of the Republic of Indonesia as stated in Paragraph IV of the Preamble to the 1945 Constitution, namely to make the nation's life more intelligent. However, the existence of PTS has greatly helped the government which cannot meet the needs of all citizens in educational services. Therefore, the government should be obliged to help private higher education institutions so that they have educational quality that is equivalent to other universities. However, in reality, quality assurance system policies actually have the potential to cause serious problems for competitiveness among higher education institutions themselves and result in losses for graduates of each institution. The aim of higher education accreditation by BAN-PT is to supervise the implementation of education. Ideally the provision of higher education has equal quality, both in terms of educational management and the quality of its graduates (Muhammad & Vidy, 2017),

The issuance of a quality assurance system policy in higher education institutions has in fact created new problems for society. This policy actually creates problems for graduates, so that they are unable to compete competitively, because higher education accreditation scores can deny graduates the opportunity (administratively) to compete. This research is different from previous research which was at the level of analyzing policy implementation and internal quality assurance. Researchers are more interested in analyzing quality assurance system policies to evaluate the results of policy implementation, ability to solve problems, from an external perspective carried out by the Higher Education Service Institute IV (LLDIKTI IV).

This research focuses on analyzing the national policy of the higher education quality assurance system which actually has the noble goal of ensuring that the Indonesian people obtain education from legal and quality institutions. In reality, the implementation of this policy actually creates competitiveness problems between universities (especially private universities) which has a detrimental impact on college graduates. Based on the background of this research, the researcher conducted research on POLICY EVALUATION STRATEGIES FOR THE IMPLEMENTATION OF QUALITY ASSURANCE SYSTEMS IN INCREASING THE COMPETITIVENESS OF PRIVATE HIGHER EDUCATION IN THE CITY OF BANDUNG. The reason for taking the research focus is because the city of Bandung is a barometer/measure of education cities in West Java, as well as taking the focus of evaluating quality assurance system policies carried out by researchers, it can answer the dynamics of higher education development in terms of theoretical evaluation of policies to improve the quality of Private Higher Education (PTS).

METHODS

This research aims to explain the suitability of quality assurance system policies according to plans and expected impacts. Therefore, research on quality assurance system policies in increasing the competitiveness of private universities in the Bandung City area is analyzed based on three dimensions, namely the output suitability dimension, the policy ability dimension to overcome social problems, and the policy impact dimension. In this research, the method used is a qualitative

method. Research using qualitative methods aims to obtain a complete picture of a matter according to the views of the people being studied. This is in line with the opinion of Silalahi (2009: 77) who states that, through qualitative research, social problems can be understood and obtain a holistic and complete picture formed with words, as well as reporting the informant's views in detail, and arranged in a natural setting. . Qualitative research is used if research factors cannot be quantified, cannot be calculated, or variables cannot be expressed with numbers such as perceptions, opinions, assumptions and so on.

The data used in this research includes facts and information regarding the evaluation of quality assurance policies for private universities, especially in the city of Bandung. Primary data is data obtained through interviews and observations that produce data, as well as informant statements related to the object of the problem being studied. The data collection techniques used are interviews, in the form of data quoted from the interview process, observations, in the form of data consisting of detailed field notes, documentation and Focus Group Discussion (FGD). In qualitative research, informants are people who are considered to know the conditions or problems discussed in the research. Thus, the informants selected in this research are as follows, Ex-Kopertis/LLDIKTI Leaders of Region IV West Java and Banten, PTS Leaders who have authority to formulate strategies and policies related to quality assurance in private universities in the Ex-Kopertis/LLDIKTI region IV West Java and Banten environment, especially in Bandung City.

RESULTS

Policy Evaluation Implementation of a Quality Assurance System to increase the Competitiveness of Private Universities in the City of Bandung

The PTS quality assurance system policy is based on important concepts of conception, symbols and objects for the integration of professional quality in PTS. Quality policy means there is an overall aim and direction within the PTS related to quality. Integrative quality policy is seen in the awareness and actions of group intelligence in PTS which are administered, informed and documented. A quality assurance policy statement is issued and signed by PTS management. so that it becomes a useful managerial tool in the practical operations of implementing education and learning at private universities, even though private universities always have certain specific quality policies.

Quality awareness, quality assurance, is the most important topic to realize the integration of quality and quantity in practical cases at PTS. The concept is simple, namely having knowledge about the quality of the in-depth totality of physical, psychological and philosophical aspects of sensations, perceptions, ideas, attitudes and feelings related to individuals or groups who have knowledge about the abstract object and comprehensive quality of PTS, at a certain time , or within a certain time range.

Clear context, strategic direction, policies and intentions of PTS regarding steps towards effectiveness and positive results. Understanding and planning the fundamental subjects at PTS forms the basis for directed progress and success at PTS. So Quality assurance policy is a high-level planning topic for organizations Policy Evaluation The implementation of a Quality Assurance System to increase the Competitiveness of Private Higher Education is discussed based on 3 dimensions, namely Administrative Evaluation, Judicial Evaluation and Political Evaluation. The implementation of the Tridharma, which is an administrated, organized, documented, informed and in-line with the goals that translate into achieving the Vision and Mission of higher education, is guaranteed in the management and implementation of quality Higher Education. Producing graduates who are able to actively develop their potential and produce science and/or technology and/or art. Useful for stakeholders (society, nation and state).

PTS quality assurance is a systemic activity to improve the quality of education in a planned and sustainable manner. Systemic and sustainable activities to improve the quality of PTS are carried out through SPMI, which is operationally stated in the Minister of Research, Technology and Higher

Education Regulation Number 62 of 2016. SPMI aims to ensure the fulfillment of Higher Education Standards (SPT), so that quality and/or quality culture grows and develops. SPMI functions to control the implementation of PTS higher education in realizing quality PTS education, in accordance with the function of PTS as higher education providers. The function of higher education in Law No. 12/2012 article 4, is as follows, developing abilities and forming a dignified national character and civilization in order to make the life of the nation intelligent, developing an academic community that is innovative, responsive, creative, skilled, competitive and cooperative. through implementing the Tridharma and developing science and technology by paying attention to and applying humanities values (Herbert, 2005).

All of this requires administrative evaluation in quality assurance system programs in the areas of authority and rights and obligations of LLDIKTI and PTS-PTS within LLDIKTI Region IV West Java and Banten, this study is focused in the Bandung City Region. Guaranteeing the quality of education at private universities in the Bandung City Region is an obligation carried out, as a form of responsibility to stakeholders, and a form of accountability. Quality assurance is carried out through a systemic and sustainable system, through a higher education quality assurance system. Higher education quality assurance system, in accordance with Law no. 12 of 2012, consisting of: 1) Internal Quality Assurance System (SPMI) developed by Higher Education, in this case by PTS in the Bandung City Area; and 2) External Quality Assurance System (SPME) which is carried out through accreditation, one of which is BAN-PT (National Accreditation Board for Higher Education).

Each tertiary institution can develop SPT and has the freedom to regulate the fulfillment of SN Dikti, while SPME is carried out through accreditation, which is carried out by BAN-PT or LAM. Having SPMI Implementation Objectives Several objectives in implementing SPMI PTS in the Bandung City Area, namely as follows, implementing government regulations as stated in Law no. 12 of 2012, which is operationally stated in Permenristekdikti No. 62/2016, guarantees and controls the educational process at the Study Program level in accordance with the policies and minimum standards of SN Dikti and standards for developing and preparing Study Programs by meeting the criteria of at least 60% (sixty percent) of Study Programs with a superior accreditation rating, in accordance with Minister of Education and Culture Regulation No. 4 of 2020.

SPMI Guidance Document for Applied Undergraduate and Undergraduate Programs - 2020, its relevance to the Decree of the Minister of Education and Culture No. 83 of 2000. Evaluate the advantages and disadvantages of study programs in accordance with standards. On destination no. 3 above, SPMI is also carried out in parallel in order to prepare study programs to prepare forms / SARs that are in accordance with the targeted national and international accreditation bodies. International accreditation bodies must be appropriate to the scientific field and recognized by the Ministry of Education and Culture. This form can be used by study programs that already have accreditation with a C/Good rating to raise the accreditation rating to excellent or superior, according to Permendikbud No. 5 of 2020. Apart from preparing to increase BAN PT's accreditation ranking, it can also be used to prepare for international accreditation.

Quality assurance is carried out by PTS in the Bandung City area, to guarantee that the PTS higher education system in the Bandung City area has exceeded SN Dikti, as well as achieving the Vision and Mission of PTS-PTS in the Bandung City area in the academic field. Achieving this Vision and Mission is carried out through several academic programs by Faculties and Departments, supported by Directorates, Offices, Bureaus and other Units. Determination of Higher Education Standards is used in SPMI PTS in the Bandung City Area. Implementation of standards is carried out by all Bachelor's Study Programs and Applied Bachelor's Study Programs. Evaluation is carried out with an internal quality audit (AMI) through the first stage, namely, audit of documents obtained from information and data that has been uploaded and filled in on SPMI.PTS in the Bandung City Area.ac.id, the relevance of the SWOT analysis and the study program development program and Evaluation is carried out on the basis of data and information as well as findings by auditors.

The standards used in SPMI PTS in the Bandung City Region in 2020, with reference to the evaluation of the implementation of SPMI in 2019, as well as taking into account the new policies that came into effect in 2020. The reference used is National Higher Education Standard 3, as the minimum standard for PTS in the Region Bandung City which includes the following 12 standards, and standard 24 of the SPMI Guidance Document for Undergraduate and Applied Undergraduate Programs - 2020, as a development as an additional standard, as an embodiment of exceeding the National Higher Education Standards, namely, national standards for education, national standards for research, and national standards for community service (Falih & Wardiyanto, 2010).

Developing, communicating and maintaining a documented quality assurance policy, PTS is responsible for achieving the expectations stated in the PTS policy in a sustainable manner. The involvement of third party (external) auditors seeks objective evidence that administrative quality assurance policies are communicated, documented and implemented effectively in all units at PTS. It is common for auditors to ask several employees/employees/lecturers to describe the PTS quality assurance policy. Although the responses are not all a reading of the quality assurance policy, they are able to demonstrate an understanding of the quality assurance policy and explain how it applies to the daily process of activities at PTS.

As a result of problems that arise regarding the established quality policy requirements. Namely, PTS top management creates, implements and documents a quality assurance policy that is in accordance with the goals and context of the organization, supports the strategic direction of PTS, is the basis for setting quality targets, including a commitment to fulfill all applicable requirements and including the impact there is a commitment to continue on an ongoing basis. improve the quality assurance system. Quality and quantity policies are mandatory to be documented and available to all interested parties.

The PTS top management team determines quality policies starting from student admissions, acceptance of lecturers and non-academic employees, librarians and others. They have knowledge of the subjects considered in policy development. The quality assurance policy has the impact of reviewing various basic information about the tangible and intangible strengths of PTS. Then the transparency of the quality policy is revealed which reflects the objectives, context and strategic direction of the centralized quality assurance system at PTS. Short document Quality assurance policy, published by PTS executive management. Published for standard operating procedures (SOP) and published full day so that it can be accessed by prospective students, students (customers), suppliers (lecturers and non-lecturers) and regulators. The document forms the basis of quality standards, and the Quality Policy describes the PTS and its commitment to quality. The information created in the PTS network is the core of what is offered which contains a set of quality principles for quality assurance services.

The quality of increasing the competitiveness of private universities can be seen from academic service procedures, completion time, service costs, service products, facilities and infrastructure as well as the competence of officers. Strategic steps in increasing quality competitiveness include issuing academic guidelines containing requirements, procedures, service costs and time limits for completing services. Placing academic and non-academic officers who are responsible for continuing the academic process to higher levels. Complete the study plan application and study results according to the specified time limit.

The effectiveness of financing leads to useful results, is right on target and has effective value. This is defined as activities that can provide satisfactory results. Means having the level to which the goal or target is achieved. It is a quantity or number to show how far the quality assurance target has been achieved. It can be known by calculating the output and objectives or it can also be said to be a measure of how far a certain level of output is, the quality assurance policies and procedures of the PTS organization and government policies. Relates to the degree of success of a PTS quality assurance operation in the public sector (Subarsono, 2005).

Based on the results of the researcher's interview on Monday 21 December 2020 with active PTS students in the LLDIKTI region IV West Java and Banten environment, especially in Bandung

City, they said that involvement in implementing academic and non-academic quality assurance policies is obedience as an internal academic community. . PTS recognizes it or not, until now it still depends on the collection of SPP and DPP, graduation fees as the main source for the construction and development of PTS. As well as the trust of banks as partners for physical development, especially the development of PTS buildings. The Quality Assurance Policy in implementing academic quality assurance activities is related to meeting the needs of stakeholders which is actualized through two things, namely establishing quality standards regarding the vision and mission and implementation of educational programs and meeting the needs of stakeholders, the world of work and the profession. Meanwhile, the determination of Quality Standards is determined based on the work plan, curriculum, teaching and learning process (PBM), assessment system, provision of facilities and infrastructure as well as accessibility to on-line information centers as stated in the strategic plan containing the vision, mission, goals, objectives, policies, and programs to be implemented; which is evaluated and prepared periodically every 5 years involving all components of the academic community

Quality Assurance System Policy on the Basis of Legal Validity

Based on the results of the researcher's interview on Monday 11 January 2021 with PTS Alumni in the LLDIKTI region IV West Java and Banten environment, especially in the city of Bandung, they said that the implementation of education at various levels is human resource intensive which is focused on qualifications and the quality of the results of the teaching and learning process. Therefore, a quality assurance system policy must be created as a basis for the dynamics of progress in campus life behavior and the dynamics of developing the needs of the wider community. And it becomes a legally binding legality to achieve certainty in the implementation of PTS.

The legal validity of the PTS quality assurance system policy relating to the administration and management of PTS implementation is determined by the strength of implementation in the presence of: legal certainty; expediency; impartiality; thoroughness; not abuse authority; openness; public interest; and good academic services. Based on general observations, it shows that the legal certainty of implementing PTS is based on notarial deeds as legal force. Even though there are still ownership disputes over the Foundation, the benefits of PTS domination are felt internally, the external impact of its strength is still partial, namely the strength of the alumni network, the strength of the individual lecturer network, and the strength of the network of individual campus structural officials and the normative independence of the campus shows the journey of neutrality. , but in-depth observations were made to show that the vision, mission and goals of education in its implementation were biased.

For example, an educational foundation is based on religion, so its implementation is biased towards the religion in question and the filling of campus structural positions is also biased. Laying down the appropriate legal basis for the facts presented by the parties in the implementation of PTS, an obligation imposed on the process of implementing PTS. The implementation of PTS is based on human resources (HR). Thus, legal tracing and documentation cannot be completed as easily as turning the palm of your hand. It must be related to multi-sector policies, for example regarding personnel related to employment policies, finance related to tax policies and others.

Problems in tracing law and legal documentation for PTS are defined as information about the law from the perspective of PTS needs. Information about this law includes at least; a collection of statutory regulations, a collection of decisions, policies, recommendations, circulars, each of which has various forms, nature and objectives. Legal search means an effort to search for and find information about PTS, while the legal documentation owned by PTS is documentation related to administration and legal information so that it is easy to use. Services for litigation aspects in completing PTS services and non-litigation aspects in the form of carrying out routine academic administration, especially providing consultation and advice in various academic processes. Non-litigation tasks are also growing, so there are academic administration experts who specifically focus their work on this aspect.

The express meaning means that for a rule to be a legal rule, it must be truly valid. For a law to become a valid legal rule, the quality assurance system policy becomes a valid or definite law. In common, a rule/policy is valid and a PTS quality assurance system is valid. The validity of rules, with regard to systemic validity, shows that justification of views regarding legal validity/certainty is in accordance with belief in real/factual sources and legality. Examining other difficulties in justifying views found in the interpretation of legal systems, and including discussions of legal validity in a positivist context (Edi, 2010).

Legal validity has almost the same meaning as legal certainty. Legal validity is very close to the positivist theory in the PTS quality assurance system policy. Laws that are passed and declared valid are laws that already exist, outlined in laws/legislation or written regulations. Legal validity emphasizes public trust in real sources, which can be seen and proven with the naked eye. Thus, the validity of the PTS quality assurance system policy is something certain, which already exists and is in effect, real and certain. This means that it has been stated in written rules in statutory regulations, government regulations, ministerial regulations, BAN-PT regulations and Standard Operational Procedures, implementation instructions and technical instructions.

The validity of evidence that is electronic in nature and is applied in the use of sophisticated technology. Electronic evidence in the use of sophisticated technology in several special laws (*lex specialist*), is only regulated for special actions in the form of policies, namely the PTS quality assurance system. The validity or legality of this electronic evidence is needed for systematic and sustainable evaluation of PTS quality assurance system policies.

The concept of the PTS quality assurance system policy was born as an effort to limit power as the holder of sovereignty which is pursued carefully with inevitability, the law was born in the form of the PTS quality assurance system policy as a limitation of power, so that government actions in the field of higher education are based on laws that do not exceed the provisions that have been set. by law, the government's actions through the PTS quality assurance system policy eliminate to zero level the existence of legal defects (*Onrechtmatig*) or invalidity. Legal validity through the PTS quality assurance system policy is a limitation for government actions so that they do not commit arbitrariness, so that legal certainty limits government actions in public services in the education and learning sector that are effective, efficient, quality and sustainable. The limits of the legal validity of electronic evidence with technological sophistication, the principle of validity/legality on the basis of a democratized system of state administration, with the basis of the government decision-making process and manifested in public policy, especially in the implementation of education and teaching nationally, regionally and locally is very closely related to The aim is to protect people's rights from government action.

Thus, the decision made becomes a government decision in the form of a valid policy and is met with material and formal requirements. The material requirements for the validity of the PTS quality assurance system policy are a government tool in the field of education and teaching at private universities as proof of government authority. The PTS quality assurance system policy as a government tool is designed to ensure that there are no legal deficiencies. The PTS quality assurance system policy is given a form specified in the regulations on which it is based and the formation of the PTS quality assurance system policy also takes into account the procedures for making policies if the procedures are clearly stipulated in the regulations.

The content and objectives of the PTS quality assurance system policy are directed at conforming the content and objectives of the PTS quality assurance system policy internally and externally to the targets to be achieved (*Doelmatig*) in making the nation's life intelligent through formal education. Legal validity in terms of formal requirements for valid regulations or graduation is clearly stated in the PTS quality assurance system policy. The limits to the validity of the PTS quality assurance system policy rules need to be quoted because they are used to assess the validity of electronic evidence and the sophistication of technology which continues to develop geometrically.

The specified conditions are related to the preparation of a PTS quality assurance system policy and are related to the way in which the PTS quality assurance system policy is made to be fulfilled, to the normative function of state administrative law in realizing a clean and authoritative government in the field of education and teaching. The period of time determined between the emergence of rights which causes the creation and announcement of the PTS quality assurance system policy is confirmed in the nomenclature and scheduling/implementation schedule (Willy, 2003).

The formal requirements for the PTS quality assurance system policy are used as an analysis of the validity of electronic evidence and technological sophistication in handling public education and learning services nationally, regionally and locally, reaching out on an international and global scale. Electronic evidence and technological sophistication are in accordance with the preparation requirements for making PTS quality assurance system policy rules, in the form of laws and systematically arriving at implementing regulations, regarding the implementation of rules for the use of electronic evidence and anticipated technological sophistication with dynamic space and time, up to the deadline. There is certainty in the use of PTS quality assurance system policy regulations. The formal requirements are clearly known as electronic evidence and technological sophistication fulfills the formal requirements as definite legal rules.

The PTS quality assurance system policy created by the government in the field of education and learning at PTS can be valid as a valid policy. Supported by the condition that there is a tool (organ) that has the power to make it, namely at the PTS itself, LLDIKTI Region IV West Java and BAN-PT. Because the PTS quality assurance system policy is a statement of the will (wilsverklaring) with the public, the formation of this will does not contain any legal deficiencies (geen juridisch gebreken in de wilsvorming).

The PTS quality assurance system policy is given a form specified in the regulations on which it is based and its maker pays attention to the method (procedure) of making the said determination, if the method in question is clearly stipulated in the basic regulations of the PTS quality assurance system policy. The content and objectives of the PTS quality assurance system policy are in accordance with the content and objectives of the basic regulations. Formulating the conditions for the validity of the PTS quality assurance system policy, whether it is valid or not depends on who makes the rules, in this case it must be the government in the field of education and learning which has authority according to the hierarchical organizational structure. In the form of clear regulations and in accordance with the underlying regulations, namely the vision, mission, objectives and main tasks, functions and responsibilities (TUPOKSIWAB) at various levels of service through the PTS quality assurance system policy. PTS quality assurance, in line with the content and objectives of the PTS quality assurance system policy regulations. Analyzing the validity and position of electronic evidence and technological sophistication in handling PTS has material and formal requirements to be implemented.

The material requirements for the PTS quality assurance system policy are included in the content of the PTS quality assurance system policy so that it is valid and used, while the formal requirements are more about the creation, time period and purpose for which the validity of the PTS quality assurance system policy was created. Matters are included in the quality assurance system policy on the basis of legal validity. Until legal validity contains full juridical aspects or does not lack juridical aspects. Theory of Proof of the implementation of the PTS quality assurance system policy on the basis of legal validity based on information (data and facts that have been processed) which provide the basis that a fact is true. Leads to the process of finding evidence, meaning the results of an evaluation process and drawing conclusions, suggestions/recommendations on meaningful findings.

Proving that the implementation of the PTS quality assurance system policy is based on legal validity, carried out with a comprehensive process from the obtaining process, the processing process to the final result of the entire process of declaring legality and its impact on the nation's intelligence and the welfare of the nation and state. This is in accordance with the proof of the quality

assurance system policy on the basis of legal validity at the level of the provisions regarding evidence, how to obtain evidence to the delivery of evidence, the strength of the evidence and the burden of proof.

Collecting and obtaining evidence to the point of submitting evidence to the PTS quality assurance system policy on the basis of legal validity, as well as the strength of evidence and burden of proof of information (processed data) for decision choices. Proof has the consequences of a series of processes and is related to electronic evidence and technological sophistication. Proving the implementation of quality assurance system policies on the basis of legal validity requires character and parameters so that the evidence obtained is in accordance with the law and has clear validity. The Positivist School is a necessity related to quality assurance system policies on the basis of legal validity. Quality assurance system policies on the basis of legal validity.

Judicial evaluation, namely analyzing the legal validity of implemented policies, possible policy violations of the constitution, violations of the legal system, ethics, state administrative regulations, and human rights. Political evaluation, namely assessing the extent to which political constituents accept the implemented public policies. Through the discussion of Howlet and Ramesh's Policy Evaluation theory in Nugroho (2011), the results of policy evaluation are not enough to support the creation of appropriate strategies, so several findings/novelties in this research found several things that are needed to enrich policy evaluation theory by combining and supporting it. evaluation to improve policy evaluation.

As for improvements that must be taken into account in policy evaluation, new findings were presented, including: (1) stakeholder evaluation, (2) desired evaluation or undesired evaluation (3) environmental evaluation and (4) existing and future evaluation. Based on the findings above, it can be recommended that the quality assurance system policy be declared to have been implemented in accordance with previously established standards or criteria, thus providing an explanation to researchers about the research above. Recommendations resulting from policy evaluations are also based on feasibility criteria that are linked to substantive rationality, namely criteria that concern the substance of the objectives (Miftah, 2011).

Then based on Law Number 12 of 2012 article 53, concerning the Internal Quality Assurance System (SPMI) which is carried out systemically to improve the quality of Higher Education in a planned and sustainable manner, through determining, implementing, evaluating, controlling and improving Higher Education standards. Apart from SPMI, what is carried out by universities in Indonesia is the External Quality Assurance System (SPME) or what is known as accreditation, and is carried out by the Independent Accreditation Institute (LAM) or the National Accreditation Board for Higher Education (BAN-PT).

After discussing the findings and criticizing Howlet and Ramesh's theory in Nugroho (2011), a new strategy was found related to the policy evaluation strategy for implementing quality assurance systems for higher education. In the context of continuous quality improvement (Continuous Quality Improvement), it is necessary to evaluate policies carried out in collaboration with the development of teaching education, research and community service (Tridharma) based on in-depth studies based on evidence (evidence based) which leads to learning outcomes and impacts on graduates (products) and programs. Academic development of quality assurance for private universities is neither centralized nor fully autonomous but accommodates both proportionally. SPMI PTS policy is in line with PT Law no. 12 of 2012 and Minister of Research, Technology and Higher Education Regulation no. 44 of 2015 concerning National Higher Education Standards, Permenristek Dikti no. 32 of 2016 concerning accreditation of study programs and universities, and Permenristek Dikti no. 62 concerning Higher Education Quality Assurance Systems. SPMI standard policies, learning standard policies, research policies, community service policies, and management and service policies.

CONCLUSION

Based on the benchmark research results and discussions that have been described, the researcher can provide the following conclusions, firstly, the implementation of the Quality Assurance System for Private Higher Education in the City of Bandung has not been fully effective. This is indicated by the fact that there are still obstacles and problems in implementing policies that are not fully in accordance with higher education quality assurance standards. Dimensions of Policy Evaluation for the Implementation of the Quality Assurance System in increasing the Competitiveness of Private Higher Education in the City of Bandung include administrative evaluation, judicial evaluation and political evaluation. Eadministrative evaluation with efforts to evaluate PTS performance with adequate evaluation of academic and non-academic performance, with a process of considering effective and efficient evaluation. The administrative evaluation group can increase the competitiveness of private universities in the city of Bandung, namely from the acceptance of new students (input) to the comparison of graduates (output), while the output shows the desire to verify cooperation with external parties (graduate users and non-BAN-PT certification institutions) in local, regional, national, international and global scales. EvaluationJudicial withThe issue of legal validity shows that there is a development in the existence of decisions, policies and contained in the internal regulations of PTS, and efforts to adapt to statutory regulations, especially with BAN-PT regulations. Political evaluation is part of the political evaluation of the educational and learning life of society and is specifically concerned with organizing and carrying out PTS tasks. Of course and definitely related to the formation and existence of legal/formal campus power/authority. The parties have the power to manage PTS, systems are needed (especially the political system of education and learning).

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