### Strategy Evaluation Policy Implementation Of Quality Assurance System In Improving The Competitiveness Of Private Universities In Bandung

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#### **Abstract**

The implementation of the Private Higher Education Quality Assurance System in Bandung City 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 on Policy Evaluation in the implementation of the Quality Assurance System of Private Universities in Bandung City. The sub-focus in this research is the dimensions that need to be carried out in the evaluation of quality assurance system implementation policies, namely: administrative evaluation, judicial evaluation and political evaluation. This study uses a descriptive analysis method with a qualitative type and is supported by the SWOT technique. This is chosen with the consideration that actual data can be obtained, able to examine research problems in depth so that results that are in line with expectations/expectations can be obtained. The results of the study indicate that the implementation of the Quality Assurance System for Private Universities in Bandung City is still not effective, so it is necessary to evaluate policies through (1) administrative evaluation by taking into account: Effort Evaluation, Performance Evaluation, Adequacy of Performance, Efficiency Evaluation and Process Evaluation, (2) Judicial evaluation by taking into account: Issues of legal legitimacy, Possible Violations of the Constitution, Possible Violations of the Legal System, Possible Violations of Ethics and State Administration Rules, (3) Political evaluation by taking into account: Political Process in determining policy, Acceptance of political constituents on public policies, Implementation of Implementation Information Technology. The results of the policy evaluation in this study then produce a recommendation strategy related to the implementation of a higher education quality assurance system in accordance with the standard provisions from the government.

**Keywords:** Policy Evaluation, Quality Assurance System, Implementation Strategy.

#### INTRODUCTION

The implementation of education is the government's task to achieve national goals in order to educate the nation's life, one of which is the implementation 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. Thus, university graduates are able to take part in the community and contribute to the empowerment of the nation and the progress of sustainable development (Riswandha, 2002).

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

Meanwhile, the results of research by James & Stewart (2000) stated that accreditation assessment has consequences for the future of graduates produced by a university. Generally, graduates not able to compete are (administratively) when the university where they study gets an accreditation value of C. For the community and the world of work, the community and the world of work consider that the accreditation value of C indicates the quality of the university is of low quality, so that the competence of its graduates is doubtful. In the journal Ma'arif & Tanjung (2003) it is stated that the assessment of the quality of graduates based on the results of accreditation is actually less relevant, because the assessment of a person's quality is based more on one's knowledge, skills and competencies, not only measured by the value of college accreditation alone. Misguided regarding the assessment of higher education accreditation in the community, of course, is very detrimental to institutions and graduates. Even though according to the law, universities that get a C accreditation score are still legal to issue a diploma, because the C accreditation score is still included in the quality assessment in the 'good' category.

Coordination of Private Universities, abbreviated as Kopertis, is a government institution that specializes in fostering private universities based on their working areas. Currently according to 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 Procedure of Higher Education Service Institutions, in 2018 Kopertis changed its name to the Institute for Higher Education Services (LLDIKTI), Junkto Regulation of the Minister of Education and Culture Number 34 of 2020 concerning the Organization and Work Procedure of Higher Education Service Institutions. The Higher Education Service Institute (LLDIKTI) in its function as an executor of tertiary readiness facilitation in external quality assurance in its working area includes 450 private higher education institutions consisting of universities, academies, community academies, high schools, institutes, and polytechnics (Dwidjowijoto, 2007)

In addition to private universities, state universities have now become the scope of work of the Higher Education Service Institute (LLDIKTI). However, in this study, researchers will focus on facilitation of external quality assurance of private universities in the work area of the Higher Education Service Institute (LLDIKTI) Region IV West Java and Banten.

Table 1.1. Recap of Universities 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 have been accredited and not a few higher education institutions that have not been accredited. Currently, according to data from Kopertis IV West Java / LLDIKTI IV there are 450 higher education institutions (private). Of this total, 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 policy on the quality assurance system 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 whole community. However, in reality, in providing higher education, private universities rely on their own efforts in order to have quality equivalent to established state universities and private universities. The burden of private universities is increasing with the implementation of the quality assurance system policy. The quality assurance system policy has in fact not succeeded in improving the quality of higher education, but

can cause new problems including the potential to kill higher education institutions (especially small private universities and regional private universities) and harm graduates to be able to compete in the world of work (Edward, 2006).

According to Micel (2001) actually private universities (PTS) are government partners to advance 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 the intellectual life of the nation. However, the existence of private universities has greatly helped the government which cannot meet the needs of all citizens in education services. Therefore, the government should be obliged to assist these private higher education institutions in order to have an education quality that is equivalent to other universities. However, in reality, the quality assurance system policy has the potential to cause serious problems for competitiveness among higher education institutions themselves and have an impact on losses for graduates of each institution. The purpose of higher education accreditation by BAN-PT is to supervise the implementation of education. Ideally the implementation of higher

education has equal quality, both in terms of educational management and the quality of graduates (Muhammad & Vidy, 2017),

The issuance of a quality assurance system policy in higher education in fact actually creates new problems for the community. This policy actually creates problems for graduates, so they are unable to compete competitively, because the value of higher education accreditation can invalidate the opportunity (administratively) for graduates to compete. This research is different from previous research which is at the level of analysis of policy implementation and internal quality assurance. Researchers are more interested in analyzing quality assurance system policies to evaluate the results of implementing policies, problem solving abilities, from the external side carried out by the Higher Education Service Institute IV (LLDIKTI IV).

This study focuses on analyzing the national policy of the higher education quality assurance system, which actually has a noble goal so that the Indonesian people get education from legal and quality institutions. In fact, the implementation of this policy actually creates a problem of competitiveness between universities (especially private universities) which has a detrimental impact on university graduates. Based on the background of this study, the researchers conducted a study on the Strategy Evaluation Policy Implementation of Quality Assurance System in **Improving** Competitiveness of Private Universities in Bandung. The reason for taking the research because is Bandung City is a barometer/measure of education city in West Java, and taking the focus of evaluating quality assurance system policies by researchers, can answer the dynamics of higher education development in terms of theoretical evaluation of policies to improve the quality of Private Higher Education (PTS).

#### **METHOD**

This study aims to explain the suitability of the quality assurance system policy according to the plan and the expected impact. Therefore, the quality assurance system policy research in improving the competitiveness of private universities in the Bandung City area is analyzed based on three dimensions, namely the output conformity dimension, the policy capacity dimension to overcome social problems, and the policy impact dimension. In this study, the method used is a qualitative method. Research with qualitative methods aims to obtain a complete picture of something according to the view of the human being studied. This is in line with the opinion of Silalahi (2009: 77) which states that, through qualitative research, social problems can be understood and obtained a holistic and complete picture formed in words, as well as reporting the views of informants in detail, and arranged in a natural setting. . Oualitative research is used when 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 study include facts and information regarding the evaluation of quality assurance policies for private universities, especially in the city of Bandung. Primary data is obtained through interviews observations that produce data, as well as statements of informants relating to the object of the problem being studied. Data collection techniques used, namely interviews (interviews), in the form of data quoted from the interview process, observations (observation), in the form of data consisting of field notes described in detail. documentation and Focus Discussion (FGD). In qualitative research, informants are people who are considered to know the conditions or problems discussed in the study. Thus, the informants selected in this study are as follows, Leaders of Ex-Kopertis/LLDIKTI Region IV West Java and Banten, Leaders of PTS

who have the authority to formulate strategies and policies related to quality assurance in private universities in the Ex-Kopertis/LLDIKTI region IV West Java and Banten, especially in the city of Bandung.

#### **RESULTS AND DISCUSSION**

# Evaluation of Quality Assurance System Implementation Policies to improve the Competitiveness of Private Universities in the City of Bandung

The PTS quality assurance system policy is based on the important concepts of conception, symbol and object for the integration of professional quality in private universities. Quality policy means that there is an overall purpose and direction in PTS related to quality. Quality policy is integratively seen in the awareness and actions of herd intelligence in PTS administered, informed which are assurance policy documented. quality statement is issued and signed by PTS management. so that it becomes a useful managerial tool in the operation of providing education and learning in private private universities, even though private universities always have certain quality policies specifically.

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

Clear context, strategic direction, policies, and intentions of PTS regarding steps towards effectiveness and positive outcomes. Understanding and planning the fundamental subjects in private universities forms the basis for

progress and success directed at private universities. So quality assurance policy is a highlevel planning topic for organizations. Evaluation of Quality Assurance System Implementation Policies to improve the Competitiveness of Private Universities is discussed based on 3 dimensions, namely Administrative Evaluation, Judicial Evaluation and Political Evaluation. The implementation of the Tridharma which is an administrative, organized, documented, informed and aligned embodiment of the objectives that translates to achieving the Vision and Mission of higher education, is guaranteed in management and implementation of quality Higher Education. Produce 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 continuous activities to improve the quality of private universities are carried out through SPMI, which is operationally stated in the Regulation of the Minister of Research, Technology and Higher Education Number 62 of 2016. SPMI aims to ensure the fulfillment of Higher Education Standards (SPT), so that a 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 PTS function as a higher education provider. The function of higher education in Law No. 12/2012 article 4, is as follows, developing capabilities and shaping the character and civilization of a dignified nation in the context of educating the nation's life, developing innovative, responsive, creative, skilled, competitive, and cooperative academics. through the implementation of the Tridharma and developing science and technology by paying attention to and applying the values of the humanities (Herbert, 2005).

All of that needs an 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 located the Bandung City in Region. Guaranteeing the quality of education at private universities in the Bandung City Region is an obligation that is carried out, as a form of accountability 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. The higher education quality assurance system, in accordance with Law no. 12 of 2012, consisting of: 1) Internal Quality Assurance System (SPMI) developed by universities, in this case by private universities in the Bandung City Region; 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 university can develop an SPT and has the flexibility 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 the implementation of SPMI PTS in the Bandung City Region, namely as follows, implementing government regulations contained in Law no. 12 of 2012, which is operationally stated in Permenristekdikti No. 62/2016, guarantees and controls the education process at the Study Program level in accordance with the policies and minimum standards of SN Dikti and development standards and prepares Study Programs by meeting the criteria of at least 60% (sixty percent) of Study Programs with superior accreditation ratings, in accordance with Permendikbud No. 62/2016. 4 year 2020.

SPMI Guidelines for Applied Undergraduate and Undergraduate Programs - 2020 its relevance to the Decree of the Minister of Education and Culture No. 83 of 2000. To

evaluate the advantages and disadvantages of the Study Program in accordance with the standards. At destination no. 3 above, SPMI is also carried out in parallel in order to prepare study programs to compile forms / SAR in accordance with the intended national and international accreditation bodies. An international accreditation body, must be in accordance with the scientific field, and be recognized by the Ministry of Education and Culture. The form can be used by Study Programs that already have accreditation with a C/Good rating to raise the accreditation rating to a very good rating or a superior rating, according to Permendikbud No. 5 of 2020. In addition to preparation for increasing the accreditation rating of BAN PT, it can also be used to prepare for international accreditation.

Quality assurance carried out by private universities in the Bandung City Region, to ensure that the PTS higher education system in the Bandung City Region has exceeded the SN Dikti, as well as the achievement of the PTS-PTS Vision, Mission in the Bandung City area in the academic field. The achievement of the Vision, 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 the SPMI PTS in the Bandung City Region, the implementation of standards is carried out by all S1 Study Programs and Applied Undergraduate Study Programs. The evaluation was carried out by an internal quality audit (AMI) through the first stage, namely, an audit of documents obtained from information and data that had been uploaded and filled in SPMI.PTS in the Bandung.ac.id City Region, the relevance between 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 the auditors.

The standards used in the SPMI PTS in the Bandung City Region in 2020, with reference to the evaluation of the implementation of the

SPMI in 2019, as well as taking into account the new policies that apply in 2020. The reference used is the National Higher Education Standard 3, as the minimum standard for private universities in the Region. The city of Bandung which includes the following 12 standards, and the standard 24 SPMI Guidance Documents for Applied Undergraduate and Undergraduate Programs – 2020, as developments as additional standards, as an embodiment of exceeding the National Higher Education Standards, namely, national education standards, research national standards, and community service national standards. (Falih & Wardiyanto, 2010).

Develop, communicate and maintain a documented quality assurance policy, PTS is responsible for achieving the expectations stated in the PTS policy on a sustainable basis. The involvement of a third party auditor (external) looking for objective evidence that administrative quality assurance policy is communicated, documented and implemented effectively in all units in PTS. It is common for auditors to ask several employees/staff/lecturers to describe the PTS quality assurance policy. Although the responses were not all of the reading of the quality assurance policy, they were able to demonstrate an understanding of the quality assurance policy and explain how it applies to the process of day-to-day activities in private universities.

As a result of problems that arise regarding the requirements of the established quality policy. 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 goals, including a commitment to meet 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 must be

documented and made available to all interested parties.

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

The quality of increasing competitiveness of private universities can be seen from the academic service procedures, completion time, service costs, service products, facilities and infrastructure and the competence of officers. Strategic steps in increasing quality competitiveness, including by issuing academic guidelines that contain requirements, procedures, service costs and time limits for service completion. Placing academic and non-academic officers who are responsible for continuing the academic process to a higher level. Completing the application for study plans and study results in accordance with the stipulated time limit.

The effectiveness of financing leads to the use of results, right on target and has an effective value, is defined as an activity that can provide satisfactory results. Means having the degree to which the goals or objectives are achieved. Is a quantity or number to show to what extent the target (target) is achieved in quality assurance. It can be known by calculating between output and objectives or it can also be said to measure how far a certain level of output is, quality assurance policies and procedures from PTS organizations and government policies. Associated with the degree of success of a private sector quality assurance operation in the public sector (Subarsono, 2005).

Based on the results of the researcher's interview on Monday, December 21, 2020 with active PTS students in the LLDIKTI region IV West Java and Banten, especially in the city of said that involvement in the implementation of academic and non-academic quality assurance policies is obedience as an internal academic community. Admittedly or not PTS, until now still depend on the withdrawal of SPP and DPP, graduation fees as the main source for the construction and development of PTS. As well as the existence of banking trust as a physical development partner, especially the development of PTS buildings. Quality Assurance Policy in the implementation of academic quality assurance activities is related to meeting the needs of stakeholders which is actualized through two things, namely setting 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. While 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 online information centers as stated in the strategic plan containing the vision, mission, goals, objectives, policies, and programs to be implemented; which is evaluated and compiled regularly every 5 years by involving all components of the academic community

## Quality Assurance System Policy with Legal Basis

Based on the results of the researcher's interview on Monday, January 11, 2021 with PTS Alumni in the LLDIKTI region IV West Java and Banten, especially in the city of Bandung, 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 is a necessity that is made as the basis for the dynamics of the progress of campus life behavior and the dynamics of developing the needs of the wider community. And it becomes a binding legal achieve validity to certainty the implementation of PTS.

The legal validity of the PTS quality assurance system policy related to administration and management of the PTS implementation is determined by the strength of the implementation in the presence of: legal certainty; benefit; impartiality; precision; not abuse authority; openness; public interest; and good academic service. Based on general observations, it is shown that the legal certainty of the implementation of PTS is standardized on a notary deed as a legal force. Although 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 independence of the campus normatively shows the journey of neutrality. However, in-depth observations were made to show that the vision, mission and goals of education in its implementation took sides.

For example, an educational foundation based on religion, then its implementation takes sides with the religion in question and the filling of campus structural positions also takes sides.

Laying the right legal basis for the facts put forward by the parties in the PTS implementation, an obligation imposed on the PTS implementation process. The implementation of PTS is on human resources (HR). Thus, legal tracing and documentation cannot be completed in a way that is as easy as turning the palm of the hand. It must be related to policies that are multisectoral, for example regarding employment related to employment policies, finance related to tax policies and others.

Problems in legal investigation and legal documentation of PTS, are interpreted as information about the law from the point of view of PTS needs. Information about this law includes at least; a collection of laws and regulations, a collection decisions. of policies, recommendations, circulars, each of which has various forms, characteristics and purposes. Legal tracing means an effort to seek and find information about private universities, while legal documentation owned by private documentation is related administration and legal information so that it is easy to use. Litigation aspect services in the completion of PTS services and non-litigation aspects in the form of organizing academic administrative routines, especially providing consultation and advice in various academic processes. Non-litigation tasks are also growing, so there are academic administrative experts who specifically focus their work on this aspect.

The explicit meaning has meaning. For a rule to be a rule of law, it must be truly legal. For a law to be a valid legal rule, the quality assurance system policy becomes a valid or definite law. Equivalently, a rule/policy legitimacy is a rule and a PTS quality assurance system legitimacy. The validity of the rules, with regard to systemic validity, indicates that the justification of views on legality/certainty is in accordance with belief in factual sources and legality. Examines other difficulties of justifying views found in the interpretation of legal systems, and includes

discussing the validity of the law in a positivist context (Edi, 2010).

Legal validity has almost the same meaning as legal certainty. The validity of the law is very close to the positivist theory in the policy of the PTS quality assurance system. Laws that are passed and declared valid are laws that already exist, set forth in laws/regulations or written rules. Legal legitimacy emphasizes people's trust in real sources, which can be seen and proven by naked eye. Thus, the validity of the PTS quality assurance system policy is certain, existing and valid, real and certain. Meaning has been stated in a written rule in the legislation, 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 technological sophistication. Electronic evidence in the use of technological sophistication, several special laws (lex specialist), are only regulated for special actions in the form of policies, namely the PTS quality assurance system. The validity or validity of this electronic evidence is needed for a systematic and sustainable evaluation of the PTS quality assurance system policy.

The concept of the PTS quality assurance system policy was born as an effort to limit the power as the holder of sovereignty which is pursued carefully with necessity, the law was born in the form of a PTS quality assurance system policy as a power limit, so that government actions in the field of higher education are based on laws that do not exceed stipulated provisions. by law. government's action through the PTS quality assurance system policy eliminates to zero the existence of legal defects (Onrechtmatig) or invalid. Legal legitimacy through the PTS quality assurance system policy is a limitation for government action so as not to do arbitrariness, so that legal certainty to limit government actions

in public services in the education and learning sector is effective, efficient, quality and sustainable. The limitations of the legal validity of electronic evidence with technological sophistication, the principle of legitimacy/legality on the basis of a democratized system of state administration, with the basis of the government decision-making process and manifested in public policies, especially in the implementation of education and teaching nationally, regionally and locally is closely related to The aim is to protect people's rights from government action.

Thus, the decision made into a government decision in the form of a valid policy is fulfilled with material and formal conditions. The material requirement for the validity of the PTS quality assurance system policy is to become a government tool in the field of education and teaching at private universities as evidence of government authority. The policy of the PTS quality assurance system as a government tool is made that there should be no juridical deficiency. The PTS quality assurance system policy is given the form stipulated in the regulations on which it is based.

The contents and objectives of the PTS quality assurance system policy are directed at the conformity of the contents and objectives of the PTS quality assurance system policy internally and externally to the targets to be achieved (Doelmatig) on the intellectual life of the nation through formal education. Legal legitimacy in the formal requirements for legal regulations or graduation is clearly stated in the PTS quality assurance system policy. Limits on the validity of the rules of the PTS quality assurance system policy need to be cited because it is to assess the validity of electronic evidence and technological sophistication that continues to develop in a geometrical order.

The specified conditions relate to the preparation of the PTS quality assurance system policy and relate to the fulfillment of the PTS

quality assurance system policy, to the normative function of state administrative law in realizing clean and authoritative government in the field of education and teaching. The period of time determined between the emergence of the rights that led to the creation and the announcement of the PTS quality assurance system policy is confirmed in the nomenclature and scheduling / implementation schedule (Willy, 2003).

The formal requirements of the PTS quality assurance system policy are used as an analysis of the validity of electronic evidence and technological sophistication in the handling of 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 requirements for preparation of regulations for the PTS quality assurance system policy, in the form of laws and systematically up to implementing regulations, regarding the implementation of the rules for using electronic evidence and anticipating technological sophistication with dynamic space and time, up to a time limit there is certainty in the use of PTS quality assurance system policy regulations. Formal requirements are clearly known as electronic evidence and technological sophistication fulfills formal requirements as a definite legal rule.

The PTS quality assurance system policy made by the government in the field of education and learning in private universities can act as a legitimate policy. Supported with the condition that there are tools (organs) that have the power to make, namely in PTS itself, LLDIKTI Region IV West Java and BAN-PT. Because the PTS quality assurance system policy is a statement of will (wilsverklaring) with the public, the formation of the will does not contain juridical deficiencies (geen juridisch gebreken in de wilsvorming) that are not legally flawed.

The PTS quality assurance system policy is given the form stipulated in the regulations on

which it is based and the makers pay attention to the procedure (procedure) of making the said determination, if the method 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 requirements for the validity of the PTS quality assurance system policy, whether it is legal or not, judging from who makes the rules, in this case the government in the field of education and learning has the authority in a 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 regulations. PTS quality assurance system policy. Analyzing the validity and position of electronic evidence and technological sophistication in the handling of PTS has material and formal requirements to be applied.

The material requirements of the PTS quality assurance system policy are included in the contents of the PTS quality assurance system policy to be valid and used, while the formal requirements are more about the making, time period and purpose of why the legitimacy of the PTS quality assurance system policy was created. It is included in the quality assurance system policy on the basis of legal validity. Until the validity of the law contains the juridical aspect in full or there is no juridical aspect. Theory of proof of application of the PTS quality assurance system policy on the basis of legal validity based on information (processed data and facts) that provides 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 the implementation of the PTS quality assurance system policy on the basis of legal validity, carried out with a comprehensive process starting from the process of obtaining, processing to the final result of the entire process of legality declaration and its impact on the intelligence of the nation 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 provisions on evidence, how to obtain evidence to the submission of evidence, strength of evidence and burden of proof.

Collecting and obtaining evidence to submitting evidence to the PTS quality assurance system policy on the basis of legal validity, as well as the strength of proof and the burden of proof of information (processed data) for decision choices. Evidence has the consequence of a series of processes and is related to electronic evidence and technological sophistication. Proving the application of quality assurance system policies on the basis of legal validity, requires characters and parameters so that the evidence obtained is in accordance with the law and its validity is clear. The positivist flow is a necessity related to quality assurance system policies on the basis of legal validity of quality assurance system policies on the basis of legal validity.

Judicial evaluation, namely analyzing the legal validity of the implemented policies, possible violations of policies against the constitution, violations of the legal system, ethics, state administration rules, to human rights. Political evaluation, which is to assess the extent to which political constituents accept the implemented public policies. Through the discussion of the policy evaluation theory by Howlet and Ramesh in Nugroho (2011), the results of policy evaluation are not sufficient to support the creation of the right strategy, so several findings/novelties in this study were

found to be necessary to enrich the theory of policy evaluation by being combined and supported by evaluation to improve policy evaluation.

As for the improvements that must be taken into account in the policy evaluation, new findings are presented, including: (1) stakeholder evaluation, (2) desired or unwanted evaluation, (3) environmental evaluation and (4) existing and future evaluations. Based on the above findings, it can be recommended that the quality assurance system policy be declared to have been implemented in accordance with predetermined standards or criteria, thus providing an explanation to the researchers about the research above. Recommendations from the policy evaluation are also based on eligibility criteria associated with substantive rationality, namely criteria concerning 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 the establishment, implementation, evaluation, control, and improvement of Higher Education standards. In addition to SPMI, what is carried out by universities in Indonesia is the External Quality Assurance System (SPME) or 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 criticism of Howlet and Ramesh's theory in Nugroho (2011), a new strategy was found related to the policy evaluation strategy of implementing a quality assurance system for universities. In the context of 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 an in-depth study

based on evidence (evidence based) that leads to learning outcomes and impacts on graduates (products) and programs. The academic development of PTS quality assurance is neither centralized nor fully autonomous, accommodates both proportionally. SPMI PTS policies are in line with the PT Law no. 12 of 2012 and Permenristek Dikti no. 44 of 2015 concerning National Standards for Higher Education, Permenristek Dikti no. 32 of 2016 concerning accreditation of study programs and Universities, and Permenristek Dikti no. 62 concerning the Higher Education Quality Assurance System. SPMI standard policies, learning standards policies, research policies, community service policies, and management and service policies.

#### **CONCLUSION**

Based on the benchmark results of the research and discussion that have been described, the researchers can conclude as follows, firstly, the implementation of the Quality Assurance System for Private Universities 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 of Quality Assurance System **Implementation** in improving the Competitiveness of Private Universities in Bandung City include administrative evaluation, judicial evaluation and political evaluation. Administrative evaluation with PTS performance evaluation efforts with adequacy of academic and non-academic performance evaluations, with the process of considering effective and efficient evaluations. The administrative evaluation group can improve the competitiveness of private universities in Bandung, namely from new student admissions (input) with a comparison of graduates (output), while the outcome shows the spirit of verification of cooperation with external

parties (graduate users and non-BAN-PT certification institutions) in local, regional, national, international and global scale. Judicial evaluation with the issue of legal validity shows that there is a development of the existence of decision-making, policies and is contained in PTS internal regulations, and attempts to adjust to the laws and regulations, especially with the rules of BAN-PT. Political evaluation is part of the political evaluation of the education and learning life of the community and is specifically related to organizing and carrying out PTS tasks. Certainly and definitely related to establishment and existence of legal/formal campus powers/authorities. The power belongs to the parties to manage PTS, systems are needed (especially the political system of education and learning).

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