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Implementation of Ministry of Home Affairs Regulation No. 7 of 2019 on Online Population Administration Services at the Magelang Regency Population and Civil Registration Office

Wanda Minerva Azhnuri[1], Dyah Adriantini Sintha Dewi[2], Habib Muhsin Syafingi[3*], Suharso[4]

[1] Universitas Muhammadiyah Magelang, Magelang, Indonesia
[2] Universitas Muhammadiyah Magelang, Magelang, Indonesia
[3] Universitas Muhammadiyah Magelang, Magelang, Indonesia
[4] Universitas Muhammadiyah Magelang, Magelang, Indonesia
[*]Corresponding author: Habib Muhsin Syafingi, Universitas Muhammadiyah Magelang

Abstract

The Magelang Regency Population and Civil Registration Office (Disdukcapil) provides documents online and offline. Ministry of Home Affairs Regulation No 7 of 2019 created the online channel to make governance more effective and efficient. This article asks how the Regulation is implemented at the office and what hinders it. This empirical socio-legal study applies the four implementation factors of George C Edwards III: communication, resources, disposition and bureaucratic structure. Primary data come from interviews in February and May 2023 with four officials of the office; the legal materials include the Regulation and the office's service standard; the analysis is qualitative. The findings rest on the informants' accounts, not on transaction data. Residents of 15 of the 21 sub-districts are reported to use offline service mainly, because of poor internet in mountain areas, limited digital skills among older residents and personal preference. Staff, budget and facilities are reported as insufficient, and the service standard is not yet fully applied. The Regulation is read as adding an online channel to offline service, not replacing it, so low online use is a problem of access and outreach and not of residents' non-compliance. The article recommends assistance points in villages, a service desk for older residents, response-time targets, a complaint channel and the systematic collection of usage data.

Keywords

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Disdukcapil; Implementation; Population; Administration; Online; Magelang

Introduction

Indonesia has one of the largest populations in the world: on 30 June 2022 the Directorate General of Population and Civil Registration reported 275,361,267 people. A population of this size needs organised public service from the centre to the regions, and population documents such as the family card, the electronic identity card and civil registration certificates are the entry point to most other services. Public service is activity in direct interaction with citizens that gives satisfaction, and it is routine and continuous.[1] The right of every resident to public service is guaranteed by Law No 25 of 2009 on Public Service.[2]

The legal basis of population administration is Law No 24 of 2013, which amends Law No 23 of 2006.[3] Ministry of Home Affairs Regulation No 7 of 2019 (the Regulation) implements this system by creating online services; according to its considerations it is meant to build effective and efficient governance by developing a new population administration service system.[4] The online channel also rests on the Law on Electronic Information and Transactions,[5] on Government Regulation No 96 of 2012 on the implementation of the Public Service Law,[6] and on Presidential Regulation No 95 of 2018 on the electronic-based government system, which is the general framework for digital government.[7] The Regulation was amended by Minister of Home Affairs Regulation No 2 of 2023, whose considerations refer to the adjustment of the provisions on paper specifications;[8] the amendment was promulgated in March 2023, while the interviews analysed here were held in February and May 2023, and the article does not analyse the amendment as such.

The Magelang Regency Population and Civil Registration Office (Disdukcapil) serves residents of the Regency through two routes: offline at the office, and online through the application 'Genduk Manis'. The informants report that residents of 15 of the 21 sub-districts still choose offline service, and only residents of the other six use the online route. The manuscript from which this article is revised also stated

[1] L P Sinambela, *Reformasi Pelayanan Publik: Teori, Kebijakan dan Implementasi* (Jakarta: Bumi Aksara, 2006).

[2] Law No 25 of 2009 on Public Service (Indonesia).

[3] Law No 24 of 2013 on the Amendment of Law No 23 of 2006 on Population Administration (Indonesia).

[4] Peraturan Menteri Dalam Negeri Nomor 7 Tahun 2019 tentang Pelayanan Administrasi Kependudukan Secara Daring [Minister of Home Affairs Regulation No 7 of 2019 on Online Population Administration Services].

[5] Law No 11 of 2008 on Electronic Information and Transactions (Indonesia).

[6] Government Regulation No 96 of 2012 on the Implementation of Law No 25 of 2009 on Public Service (Indonesia).

[7] Presidential Regulation No 95 of 2018 on the Electronic-Based Government System (Indonesia).

[8] Peraturan Menteri Dalam Negeri Nomor 2 Tahun 2023 tentang Perubahan atas Peraturan Menteri Dalam Negeri Nomor 7 Tahun 2019 tentang Pelayanan Administrasi Kependudukan Secara Daring [Minister of Home Affairs Regulation No 2 of 2023 amending Regulation No 7 of 2019].

that residents choose online service more often than offline; that statement contradicts the informants' account, no transaction figures support it, and it has been removed. The question is therefore why the online channel is used so little and what the office and the regional government can do about it.

Earlier research on the Regulation is limited. Chrismonita and others studied the same Regulation at the population office of the neighbouring Magelang City and concluded that online service was not yet effective in supporting good governance because of limited human resources, facilities needing improvement and weak outreach to the public; they note that use rose in 2020, when pandemic measures required residents to apply online.[9] That study measured effectiveness in a city office and with legal-effectiveness theory. This article differs in three ways: it studies the Regency, whose sub-districts include mountain areas; it uses Edwards's policy implementation model, which separates communication, resources, disposition and bureaucratic structure;[10] and it tests the framing of online use as a duty of residents against what the Regulation and the right to public service provide.

Two research questions are asked: (1) how is Ministry of Home Affairs Regulation No 7 of 2019 implemented at the Magelang Regency Disdukcapil; and (2) what hinders online population administration services there, and what solutions follow? The purpose is to answer them and to propose measures that the office and the Regency government can adopt and test.

Research Method

This is empirical legal research with a socio-legal approach, applying Edwards's implementation theory to a single office.[11] Primary data were gathered through interviews with four officials of the Magelang Disdukcapil, listed in Table 1. Each informant was interviewed twice, in February and in May 2023. The interviews were used to examine the four Edwards factors: how the Regulation and the application are communicated to residents, the staff, budget and facilities of the office, the conduct of the divisions, and the application of the service standard. The findings below are therefore the informants' accounts and not independent observation.

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[9] Verent Nadya Chrismonita, Dyah Adriantini Sintha Dewi, Suharso Suharso & Budiharto Budiharto, "Efektivitas Permendagri Nomor 7 Tahun 2019 tentang Pelayanan Administrasi Kependudukan Secara Daring (Studi di Disdukcapil Kota Magelang dalam Rangka Mewujudkan Good Governance)" (2020) 2:2 *Borobudur Law Review* 64, DOI: <10.31603/burrev.3917>.

[10] George C Edwards III, *Implementing Public Policy* (Washington, DC: Congressional Quarterly Press, 1980).

[11] *Ibid*.

Table 1. Informants and dates of interview

Informant (by position)	Interview dates, 2023
Head of the Magelang Regency Disdukcapil	21 February and 9 May
Head of the Division of Population Information System and Data Use	22 February and 10 May
Financial Reporting Officer (Penata Laporan Keuangan)	23 February and 11 May
Facilities and Infrastructure Officer (Pengelola Sarana dan Prasarana)	24 February and 12 May

Source: the authors' list of informants.

The legal materials are Law No 24 of 2013, Law No 25 of 2009, Law No 11 of 2008, Government Regulation No 96 of 2012, Presidential Regulation No 95 of 2018, the Regulation with its 2023 amendment, and the head of the office's decision on service standards (No 188.65/6/KEP/12/2021). The secondary materials are books on public service and policy implementation and a journal article on the same Regulation. The article does not use transaction statistics, performance appraisals or budget documents, because none were obtained; every figure it reports is the informants'. The data are analysed qualitatively: the informants' accounts are grouped under Edwards's four factors and compared with what the Regulation and the service standard require. The limits of this design are stated in the Conclusion.

Results and Discussion

The Office and the Regulation

The Magelang Disdukcapil is a regional executing unit for population administration and civil registration, headed by a head of office who reports to the Regent through the Regional Secretary. It has a secretary, sub-divisions for planning and finance and for general affairs and staffing, functional positions and three divisions: population registration, civil registration, and population information system and data use. Its vision is to be professional and creative in service, and its mission is to provide easy, fast and free service. Only these features matter for the analysis, since they locate the responsibility for each Edwards factor.

The Regulation follows its considerations in creating an online system of service. Read with the Law on Public Service, it supports an obligation on the office to provide the online channel, but the provisions cited by the authors do not make online use a duty of residents; the authors link the four Edwards factors to its chapters on electronic documents, facilities and infrastructure, work mechanism, monitoring, evaluation and reporting, and funding.[12] The authors' article numbers for these chapters overlap (the same article is cited for work mechanism and for funding) and have not been confirmed against the official text and its 2023

[12] Regulation No 7 of 2019, *supra* note 4.

amendment; this article therefore refers to the chapters and not to article numbers, and the numbers must be checked before publication. A resident keeps the right to public service under Law No 25 of 2009,[13] so offline service remains available and online service is an additional route that the office must make workable.

Communication

Communication means that implementers know what to do and that the policy's aims reach the target groups with little distortion.[14] The office offers offline service (family card, marriage, death and divorce registration and the electronic identity card) and online service through 'Genduk Manis'. According to the informants, residents of 15 of the 21 sub-districts prefer offline service for four reasons: the internet is difficult in mountain areas; people over 50 do not understand the internet; people over 45 cannot use Android smartphones; and some residents simply prefer offline service, although staff have given outreach in every sub-district on how to use the application.[15] The age thresholds of 45 and 50 and the classification of 15 and 6 sub-districts are the informants' impressions; the office did not provide a survey or transaction logs by sub-district and year. They are therefore treated as indications of where and why online use is low, not as measured facts.

Two points follow from this account. First, the reasons given are about access and capability: network coverage, skills and equipment. They do not show a refusal to obey the Regulation, and the idea that residents must be 'disciplined' into online use does not fit a system in which offline service remains lawful and available. The measure of implementation is whether those who can and wish to use the online route are able to, and whether those who cannot are served elsewhere. Second, the informants judged internal communication in the office to be weak, and no measure of the results of the outreach in the sub-districts was reported.

Resources

The informants describe the human resources as inadequate: the performance assessment of the office's employees over 2017 to 2022 is said to have stayed low with no change, but the source and criteria of the assessment were not provided, so the claim cannot be tested and is reported only as the informants' view.[16] On the budget, the office wants to build a new waiting room on empty land, but the cash

[13] Law No 25 of 2009, *supra* note 2.
[14] Edwards, *supra* note 10.
[15] Interviews with the Head, the Head of the Division of Population Information System and Data Use, the Financial Reporting Officer and the Facilities and Infrastructure Officer, Magelang Regency Population and Civil Registration Office (21–24 February and 9–12 May 2023).
[16] *Ibid*.

budgets for 2021 and 2022 were not enough for a construction costed at IDR 15,000,000 over five months. That sum is very small for a building, and it is either a partial item or a mistake; the authors must confirm it against the budget document, and no conclusion is drawn from the amount itself. Facilities and infrastructure, including the waiting area and equipment for online service, are described as very few. The Regulation treats facilities, infrastructure and funding as conditions of online service, so a shortage here is a direct obstacle.

Disposition and Bureaucratic Structure

Disposition means the implementers' attitude: commitment, honesty and willingness to carry out the policy.[17] The informants described the disposition within the divisions as weak, in the sense that each division does its own work with limited coordination, and that the office has not yet improved how instructions (dispositions) are prepared, how their handling is reported and how draft disposition letters are made. No document, observation or second source supports a stronger judgement on individual honesty or commitment, and this article makes none; what the evidence supports is a weakness in internal coordination and in the administration of instructions.

On bureaucratic structure, Edwards points to standard operating procedures and to fragmentation of responsibility.[18] The authors refer to Regent's Regulation No 11 of 2022 (Article 3(1)), which they cite for the structure of the office, and to the head of the office's decision on service standards, which they say are not yet fully applied.[19] They connect this to the fact that many residents have not registered for online service. That connection mixes two things: the number of registered users is a measure of public uptake, whereas the structure and the standard concern how the office is organised and how it must perform. The question for a service standard is whether it fixes a time for each service, a responsible unit and a complaint channel, and whether practice meets them. The study did not obtain response-time or complaint records, so it cannot say how far practice departs from the standard; the informants' view that the standard is only partly applied is recorded as their view.

Comparison with Earlier Research

[17] Edwards, *supra* note 10.

[18] *Ibid*.

[19] Keputusan Kepala Dinas Kependudukan dan Pencatatan Sipil Kabupaten Magelang Nomor 188.65/6/KEP/12/2021 tentang Standar Pelayanan [Decision of the Head of the Magelang Regency Population and Civil Registration Office No 188.65/6/KEP/12/2021 on Service Standards].

The findings agree with Chrismonita and others on three obstacles: limited human resources, facilities needing improvement and weak outreach.[20] They differ on context. In Magelang City, use rose once pandemic rules required online applications; in the Regency, mountain terrain, network coverage and age are reported as the main barriers, so a rule that only pushes residents online would not remove them. The result also supports Edwards's point that resources and communication cannot be separated from the policy's content, since a good policy can fail if implementers lack the means to carry it out.[21] What this article adds is the use of the four-factor model on a Regency office, the separation of access barriers from non-compliance, and the plain statement of what the evidence cannot show.

Hindrances and Recommendations

Among the hindrances, the informants include that applicants tend to be in a hurry and want documents issued quickly, although verification of uploaded data takes time. This is a hindrance in the sense that expectations differ from the verification process, and it points again to the need for a published response time, so that applicants know what to expect.[22] The office's own plans, as the informants described them, are that from January 2023 five staff invite residents of each sub-district to outreach sessions at the office, that sub-district, village and RT/RW heads be asked to mobilise attendees, that outreach be held twice a month per sub-district with 300 seats, and that the office add ten employees a year from 2021 to 2023, as far as funds allow. These are the office's plans, not the authors' recommendations, and the study has no data on how far they have been carried out.

The informants also mentioned that, to meet monthly spending, each employee might pay a monthly contribution of IDR 500,000. This article does not adopt the proposal. Public service is financed from the state and regional budgets, and a regular payment from officials' own pay to meet the expenses of a public office is not a recognised source of funding; it would blur the line between personal and public money and invite questions under the rules on gratuities and on non-tax state revenue, which would need separate analysis. The remedy for a funding gap is a budget proposal to the Regency government, not private contributions.

Table 2. Findings by Edwards's factor

Factor	Reported by informants	Assessment in this article
Communication	15 of 21 sub-districts prefer offline service; outreach done in every sub-district	Access and capability barriers; no usage data; not a refusal to comply

[20] Chrismonita et al, *supra* note 9.
[21] Edwards, *supra* note 10.
[22] Service Standard Decision, *supra* note 19.

Resources	Low staff performance, insufficient budget, few facilities	Reported only; criteria and budget documents not provided
Disposition	Divisions work separately; handling of dispositions not improved	Weak internal coordination; no evidence on honesty or commitment
Bureaucratic structure	Service standard not fully applied	Cannot be tested without response-time and complaint records

Source: interviews with the four informants and the authors' analysis.

Conclusion

On the first question, implementation of the Regulation at the Magelang Disdukcapil is partial. According to the informants, the online channel exists but is used little in 15 of the 21 sub-districts, and each Edwards factor shows a weakness: communication and outreach that do not reach older and remote residents, insufficient staff, budget and facilities, weak internal coordination, and a service standard that is not yet fully applied. On the second question, the hindrances are poor network coverage in mountain areas, limited digital skills and equipment among older residents, personal preference, applicants' haste and the office's limited resources; they are barriers of access, not of non-compliance, because offline service remains available.

Five measures are recommended, each of which can be tested. The Regency should open assistance points in villages or sub-districts with staff or trained volunteers who help residents apply online, and measure the share of applications made there. The office should keep a service desk for older residents and others who cannot use the application. It should publish response-time targets for each service and report the share met. It should provide a complaint channel with a recorded response. And it should record online and offline transactions by sub-district and year, so that the claim on residents' preferences can be tested. The Regency government should also ask the telecommunications authorities and operators about network coverage in the mountain sub-districts, and fund the staff and facilities of the office through its budget.

The study has limits. It rests on four informants from one office, on interviews only, without transaction data, performance appraisals, budget documents or interviews with residents; the figures it reports (15 and 6 sub-districts, age thresholds, the construction cost) are the informants' and could not be checked. The legal analysis follows the Regulation as cited by the authors, and the article numbers and the effect of the 2023 amendment must be confirmed against the official text. Later research should add transaction data and the views of residents and should assess the measures proposed.

Ethics and Data Availability

This research was empirical but limited to interviews with four public officials about the performance of their duties. The officials are identified by position only; no personal data of residents were collected, so formal ethical approval was not required. The legal materials are publicly available, and the interview records are held by the authors and can be shared on reasonable request.

Use of Generative AI

Generative AI was used only to improve the language of this article (grammar, clarity and style). The authors reviewed the output and are responsible for the content of the article.

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