

## FROM COMPLIANCE TO LEARNING: APPLYING WINTER'S POLICY IMPLEMENTATION MODEL TO ACCREDITATION REFORM IN INDONESIAN HIGHER EDUCATION

### DA CONFORMIDADE À APRENDIZAGEM: APLICANDO O MODELO DE IMPLEMENTAÇÃO DE POLÍTICAS DE WINTER À REFORMA DA ACREDITAÇÃO NO ENSINO SUPERIOR INDONÉSIO

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#### **Abstract**

Global accreditation reforms are shifting from compliance-driven control toward learning-oriented quality assurance. This study applies Winter's (2003) Policy Implementation Model, integrated with Argyris & Schön's (1978) double-loop learning, to examine how Indonesia's LAMDIK accreditation reform functions as institutional learning. Using a qualitative case-study design, data were gathered from eight accredited teacher-education institutions through interviews, document analysis, and observation, then analyzed thematically using NVivo 14. Findings reveal that contextual asymmetry (unequal digital

#### **Resumo**

As reformas globais de acreditação estão passando de um controle orientado para a conformidade em direção à garantia da qualidade orientada para a aprendizagem. Este estudo aplica o Modelo de Implementação de Políticas de Winter (2003), integrado à aprendizagem de duplo ciclo de Argyris e Schön (1978), para examinar como a reforma de acreditação da LAMDIK, na Indonésia, funciona como aprendizagem institucional. Utilizando um estudo de caso qualitativo, os dados foram coletados de oito instituições de formação de professores acreditadas por meio de entrevistas, análise documental e



capacity and regulatory ambiguity) and organizational inertia constrain policy translation, while intrinsic motivation within quality-assurance units fosters reflective practice and adaptive feedback loops. The study develops a Participatory and Integrated Implementation Model linking contextual, organizational, and motivational dimensions. Theoretically, it extends Winter's model to higher-education governance; practically, it informs accreditation bodies seeking to balance accountability and learning. This is the first empirical application of Winter's model to accreditation reform in Southeast Asia, contributing to global debates on quality assurance and institutional learning within decentralized systems. The model provides transferable insights for developing countries seeking to build reflective, learning-oriented accreditation systems.

**Keywords:** Accreditation Policy, Higher Education Governance, LAMDIK, Policy Implementation, Soren C, Winter Model.

*observação, e posteriormente analisados tematicamente utilizando o NVivo 14. Os resultados revelam que a assimetria contextual (capacidade digital desigual e ambiguidade regulatória) e a inércia organizacional restringem a tradução de políticas, enquanto a motivação intrínseca nas unidades de garantia da qualidade fomenta a prática reflexiva e ciclos de feedback adaptativos. O estudo desenvolve um Modelo de Implementação Participativo e Integrado que conecta as dimensões contextual, organizacional e motivacional. Teoricamente, ele estende o modelo de Winter à governança do ensino superior; na prática, ele fornece informações para órgãos de acreditação que buscam equilibrar responsabilidade e aprendizagem. Esta é a primeira aplicação empírica do modelo de Winter à reforma da acreditação no Sudeste Asiático, contribuindo para os debates globais sobre garantia da qualidade e aprendizagem institucional em sistemas descentralizados. O modelo oferece insights transferíveis para países em desenvolvimento que buscam construir sistemas de acreditação reflexivos e orientados para a aprendizagem.*

**Palavras-chave:** Política de Acreditação. Governança do Ensino Superior. LAMDIK. Implementação de Políticas. Modelo de Soren C. Winter.

## 1 INTRODUCTION

In contemporary higher education governance, accreditation has become a pivotal mechanism for ensuring accountability, credibility, and sustained quality improvement (Javed & Alenezi, 2023; Srijampana *et al.*, 2025). As global education systems transition toward outcome-based and evidence-driven management, accreditation no longer serves merely as a compliance mechanism but as a strategic process linking institutional performance with societal expectations and international standards (Jafarov, 2024). Through accreditation, universities demonstrate their ability to produce competent graduates, maintain academic integrity, and uphold good governance principles that form the foundation of modern quality assurance (Iqbal *et al.*, 2024). Within Southeast Asia, the harmonization of higher education standards under the ASEAN Quality Assurance Network (AQAN) further underscores the role of accreditation as a regional policy tool to promote cross-border comparability and institutional excellence (Rahmaniati &

Bulkani, 2022). This global transformation illustrates that accreditation increasingly functions as a tool for institutional learning rather than mere control, reshaping how universities internalize accountability and innovation.

In Indonesia, accreditation plays a central role in aligning higher education institutions with national and international benchmarks. Historically, accreditation was centralized under the National Accreditation Board for Higher Education (*Badan Akreditasi Nasional Perguruan Tinggi BAN-PT*), which provided standardized assessments across all academic disciplines. While effective in maintaining uniformity, this centralized system was often criticized for its bureaucratic rigidity and limited responsiveness to disciplinary and institutional diversity (Khalilah, 2023b). Recognizing these limitations, the Ministry of Education, Culture, Research, and Technology (*Kementerian Pendidikan, Kebudayaan, Riset, dan Teknologi Kemendikbudristek*) initiated a major reform by establishing several independent accreditation agencies (*Lembaga Akreditasi Mandiri LAM*). Among them, the *Lembaga Akreditasi Mandiri Kependidikan* (LAMDIK) was created specifically to oversee accreditation of teacher education programs (*Lembaga Pendidikan Tenaga Kependidikan LPTK*). This structural shift signaled the government's recognition that a 'one-size-fits-all' model could not accommodate the diverse missions of Indonesian higher-education institutions. By devolving authority to discipline-based accreditation bodies, the reform aimed to promote contextual evaluation and professional self-regulation within each academic field (Budiman & Barata, 2018; Mudjahid Zein *et al.*, 2022).

This reform marked a paradigmatic shift in Indonesia's quality assurance landscape from a uniform, centrally administered framework toward a more decentralized, discipline-based accreditation system emphasizing autonomy, participation, and continuous improvement (Mudjahid Zein *et al.*, 2022). LAMDIK's mandate, grounded in *Law No. 12 of 2012 on Higher Education and Government Regulation No. 4 of 2014*, emphasizes that quality assurance should be adaptive to the characteristics of each discipline and institution (Peraturan Pemerintah No. 4 Tahun 2014, 2014; UU No. 12 Tahun 2012, 2012). Under *Permendikbudristek No. 53 of 2023*, higher education institutions are required to integrate external quality assurance mechanisms such as LAMDIK accreditation with their Internal Quality Assurance System (*Sistem Penjaminan Mutu Internal SPMI*) (Peraturan Menteri Pendidikan, Kebudayaan, Riset, Dan Teknologi Republik Indonesia Nomor 53 Tahun 2023 Tentang Penjaminan Mutu

Pendidikan Tinggi, 2023). This integration reflects a global trend where external evaluation is linked to internal organizational learning, moving beyond compliance toward strategic quality enhancement (Argyris & Schon, 1978).

While conceptually progressive, the implementation of LAMDIK-based accreditation poses significant challenges, particularly for small and medium-sized private teacher training institutes (*Institut Keguruan dan Ilmu Pendidikan IKIP*) (Khalilah, 2023a). Institutions such as IKIP Widya Darma Surabaya operate under resource constraints limited human resources, insufficient digital infrastructure, and modest funding which impede their ability to meet the comprehensive documentation, evaluation, and evidence-based requirements of LAMDIK. The transition from BAN-PT to LAMDIK requires institutions not only to revise their documentation practices but also to internalize new paradigms of quality management, including outcome orientation, stakeholder participation, and data-driven decision-making (Khalilah, 2023a). However, decentralization alone does not automatically cultivate a culture of reflection; without sufficient institutional readiness and internal capacity, accreditation risks remaining a procedural exercise rather than a learning mechanism. Despite substantial scholarship on accreditation effectiveness, few studies have examined how accreditation policies are translated into organizational learning within developing higher-education systems

In this context, accreditation becomes more than a regulatory process; it becomes a test of institutional adaptability (Arja *et al.*, 2024). Compliance with LAMDIK's nine standards ranging from vision and governance to research output, community engagement, and student satisfaction demands integrated collaboration among various academic and administrative units (Javed & Alenezi, 2023). However, empirical observations show that many institutions, including IKIP Widya Darma, still treat accreditation as an episodic event rather than a continuous improvement cycle. As a result, the preparation of *Laporan Evaluasi Diri* (LED) and *Laporan Kinerja Program Studi* (LKPS) often focuses on documentary completeness instead of critical self-reflection (Arja *et al.*, 2024).

This condition reveals a structural paradox: while LAMDIK promotes decentralization and autonomy, many institutions remain trapped in centralized, compliance-driven routines inherited from BAN-PT's era. Consequently, the spirit of reform intended by the policy enhancing institutional ownership of quality has not been fully realized at the ground level. The case of IKIP Widya Darma Surabaya illustrates this

paradox, offering an important empirical lens to explore the tension between standardization and contextual flexibility in accreditation governance.

### **1.1 Research gap and justification**

Existing studies on accreditation in Indonesia have predominantly focused on compliance outcomes such as rankings, accreditation scores, or performance indicators without critically analyzing the process through which accreditation policies are implemented (Ghazali *et al.*, 2023). Research on LAMDIK, in particular, remains scarce due to its relatively recent establishment. Most available studies address procedural guidelines or technical readiness rather than the behavioral and organizational dimensions of implementation. Furthermore, scholarship on accreditation has largely concentrated on large public universities with substantial resources and institutional prestige, while smaller private institutions, especially LPTKs, remain underrepresented in both national and international research (Khalilah, 2023a).

This study addresses these gaps by conducting an in-depth case analysis of IKIP Widya Darma Surabaya, a private LPTK navigating the implementation of LAMDIK-based accreditation under constrained conditions. By examining the interaction among contextual, organizational, and motivational factors, the research contributes to a nuanced understanding of how policies are operationalized at the micro-institutional level. More importantly, it moves beyond descriptive accounts to formulate a Participatory and Integrated Implementation Model that connects external accreditation mechanisms (LAMDIK) with internal quality assurance (SPMI) and reflective learning processes.

Through this integration, the study not only contributes empirically to Indonesian higher education governance but also extends theoretically the application of policy implementation and organizational learning frameworks in the context of decentralized quality assurance.

### **1.2 Research objectives and questions**

The primary objective of this research is to analyze how the LAMDIK-based accreditation policy is implemented at IKIP Widya Darma Surabaya through the lens of policy implementation and institutional learning. Specifically, this study seeks to evaluate

the extent to which the implementation process aligns with LAMDIK's regulatory framework and quality assurance principles, while identifying the contextual, organizational, and motivational factors that influence its effectiveness. In doing so, the research aims to understand how institutional actors leaders, quality assurance units, and academic staff translate external policy directives into internal practices and behaviors. Ultimately, the study endeavors to develop a participatory and integrated implementation model that connects external accreditation with internal quality assurance mechanisms (SPMI) as a means of transforming accreditation from a technical compliance activity into a reflective learning process. Accordingly, this inquiry is guided by three overarching questions: how the LAMDIK-based accreditation policy is implemented within the institutional context of IKIP Widya Darma Surabaya; what internal and external factors shape and constrain the implementation process; and in what ways accreditation can evolve into a learning-oriented governance mechanism that fosters continuous institutional improvement.

### **1.3 Significance and novelty**

The significance of this study lies in both its theoretical and practical contributions.

Theoretically, the research advances the literature on higher education governance by extending Winter's (2003) policy implementation model into the domain of accreditation and quality assurance (Winter, 2003). This cross-domain application illustrates the versatility of implementation theory in explaining complex interactions between policy frameworks and institutional behavior. The study also introduces the concept of participatory integration, combining Winter's structural perspective with Argyris and Schön's (1978) learning paradigm (Argyris & Schon, 1978). This theoretical synthesis represents a novel approach to understanding accreditation not as a control mechanism but as an iterative process of organizational learning and policy translation.

Empirically, the study contributes rare, context-specific insights into how small, resource-limited institutions implement accreditation policies in Indonesia's decentralized education system. While much of the literature focuses on elite institutions, this research captures the realities of a modest LPTK like IKIP Widya Darma, where innovation must coexist with limitation (Absor & Hairunas, 2022). The proposed

Participatory and Integrated Implementation Model linking LAMDIK, SPMI, and reflective learning cycles constitutes the paper's primary novelty. It redefines accreditation as a collaborative, continuous process rather than a bureaucratic event, aligning with global discourses on adaptive governance in higher education (Javed & Alenezi, 2023).

Practically, the findings offer actionable recommendations for policymakers, accreditation agencies, and educational institutions. For LAMDIK, the study highlights the importance of establishing mentoring systems, feedback mechanisms, and digital integration tools to facilitate implementation. For higher education institutions, particularly private LPTKs, the study provides a framework for cultivating a culture of participation, reflection, and accountability. For government regulators, it underscores the need for differentiated policy support tailored to the capacity levels of diverse institutions.

## **2 LITERATURE FRAMEWORK**

Previous studies on accreditation and quality assurance in Indonesian higher education have primarily focused on the administrative and procedural dimensions of compliance. Absor (2022), for instance, examined faculty members' perceptions of the accreditation process and found that most higher education institutions (HEIs) view accreditation as a bureaucratic obligation rather than as a mechanism for institutional learning and transformation (Absor & Hairunas, 2022). Similarly, Budiman and Barata (2018) highlighted that leadership style significantly influences the achievement of institutional accreditation outcomes, emphasizing procedural compliance more than continuous improvement (Budiman & Barata, 2018). Sari (2021) further identified that many teacher education institutions interpret accreditation as a technical exercise centered on document completion instead of as an ongoing quality enhancement process (Sari, 2021). Research by Iqbal *et al.* (2024) and Arja *et al.* (2024) reinforced these observations, showing that accreditation in both local and international contexts often operates as an external quality-control mechanism rather than an internally owned development tool (Arja *et al.*, 2024; Iqbal *et al.*, 2024). Although these studies recognize the accountability function of accreditation, they rarely address the behavioral, motivational, and organizational dimensions that determine the success or failure of policy implementation. Consequently, much of the literature still portrays accreditation

as a static assessment regime, overlooking its potential as a dynamic process of organizational learning and adaptation. Collectively, these studies reveal that Indonesian accreditation remains predominantly procedural centered on fulfilling documentation requirements and formal indicators instead of cultivating reflective institutional learning. Similar critiques appear in international scholarship, where researchers such as Newton (2022) and Harvey (2021) note that accreditation in many OECD countries risks devolving into symbolic compliance unless embedded in genuine feedback and reflection mechanisms.

A second strand of scholarship examines quality assurance within the broader context of higher education governance reform in Indonesia. Khalilah (2023) emphasize that the establishment of independent accreditation bodies such as LAMDIK reflects a paradigm shift toward decentralization and participatory governance aligned with global quality-assurance frameworks (Khalilah, 2023b). However, these reforms also expose tensions between standardization and institutional autonomy, especially among smaller private institutions struggling to meet externally defined benchmarks. Comparative analyses in Southeast Asia provide additional insight: Malaysia's Malaysian Qualifications Agency (MQA) has successfully institutionalized outcome-based assessment and internal quality culture (Iqbal *et al.*, 2024), while Thailand's ONESQA and the Philippines' AACCUP emphasize stakeholder participation and peer review mechanisms (Rahmaniati & Bulkani, 2022). Nevertheless, empirical research examining how individual actors and organizational units internalize accreditation standards within institutional culture remains limited. Few studies have explicitly applied implementation theories such as Winter's (2003) multi-level policy model to understand how contextual, organizational, and motivational factors shape accreditation outcomes (Winter, 2003). This research gap underscores the need for studies connecting policy-implementation theory with institutional quality-assurance practice, demonstrating how accreditation can evolve from a compliance mechanism into a participatory system for continuous improvement.

### 3 RESEARCH METHODS

#### 3.1 Research design

This study adopts a qualitative case study design to explore the implementation of the LAMDIK-based accreditation policy at *Institut Keguruan dan Ilmu Pendidikan (IKIP) Widya Darma Surabaya*. The qualitative approach is selected to capture the depth, context, and meaning of policy implementation as experienced by institutional actors in their natural setting (Creswell, 2018). Unlike quantitative approaches that focus on generalizability, qualitative inquiry enables the identification of patterns of behavior, motivation, and interaction that shape policy outcomes. The case study method, as articulated by Yin (2018), is particularly appropriate when the research seeks to explain “how” and “why” a complex process unfolds within its organizational context (Yin, 2018).

In this research, the LAMDIK accreditation process functions as a bounded system that encapsulates multiple layers of interaction between LAMDIK as the external regulatory body, institutional management as the implementing agent, and lecturers and quality assurance units as frontline actors. By treating accreditation as a multi-actor implementation process, the study captures how national policy directives are translated into institutional routines, practices, and interpretations. The research therefore does not aim to measure compliance per se but to understand the dynamics and determinants of implementation behavior within a specific institutional environment.

The study’s design is grounded in Soren C. Winter’s (2003) *multi-level policy implementation model*, which conceptualizes implementation as a function of three interrelated dimensions: (1) contextual factors, encompassing political-administrative frameworks, institutional rules, and resource structures; (2) organizational behavior, involving inter-unit coordination, leadership practices, and communication flows; and (3) individual motivation and capacity, referring to actors’ willingness, perception, and competence in enacting policy tasks (Winter, 2003). This theoretical lens enables a systematic investigation of how external regulations are interpreted internally, how institutional structures mediate policy translation, and how human agency influences organizational compliance and learning.

Complementing Winter's model, the study integrates the double-loop learning framework of Argyris and Schön (1978) to illuminate the transformative potential of accreditation (Argyris & Schon, 1978). This integration provides a dual perspective: Winter's model explains *how* implementation occurs, while Argyris and Schön's framework elucidates *how learning and adaptation emerge* through that implementation process. Together, these theories form the analytical foundation for interpreting the empirical data and developing the proposed *Participatory and Integrated Implementation Model*.

### 3.2 Research site and context

The research site, IKIP Widya Darma Surabaya, is a private teacher education institute located in East Java, Indonesia. Established in the early 1980s, the institution has a longstanding mission to prepare professional educators through undergraduate and postgraduate programs. However, as a small-scale LPTK (*Lembaga Pendidikan Tenaga Kependidikan*), it faces typical challenges common among private higher education institutions: limited financial resources, modest research output, uneven lecturer qualifications, and relatively low digital infrastructure capacity.

The study was conducted during the period of the LAMDIK accreditation cycle for the Teacher Education Program (Pendidikan Profesi Guru) between 2022 and 2023. This period was critical because it represented the institution's first transition from the previous BAN-PT accreditation system to the newly established LAMDIK standards. The transition required not only structural adjustments such as new data management systems and performance indicators but also cultural changes in how academic and administrative staff understood quality assurance. The institutional context therefore provided an ideal setting to observe both compliance-driven and learning-driven dynamics in real time.

### 3.3 Data sources and participants

The study employed multiple data sources to ensure triangulation and analytical validity. The primary data were collected through semi-structured interviews with key institutional actors directly involved in the accreditation process, including (1) the Rector and Vice Rector for Academic Affairs, (2) the Head of the Quality Assurance Unit

(*Lembaga Penjaminan Mutu LPM*), (3) the Head of the Study Program, (4) three lecturers representing different departments, and (5) two administrative staff responsible for accreditation documentation and reporting.

In total, eight participants were interviewed. They were selected using purposive sampling, ensuring that each informant possessed direct experience and decision-making involvement in the LAMDIK implementation process (Miles *et al.*, 2014). The interviews were conducted in a conversational format, allowing respondents to articulate their experiences, perceptions, and interpretations of accreditation practices. Each interview lasted between 45 and 90 minutes, was audio-recorded with consent, and subsequently transcribed verbatim.

**Table 1**

*Participant Overview*

Participant Code	Role/Position	Years of Experience	Function in Accreditation of Process
P1	Head of Quality Assurance Unit (LPM)	12	Led coordination and alignment of documentation across programs
P2	Program Chair – Education Department	8	Prepared LED and LKPS; ensured curricular data compliance
P3	Lecturer / Quality Team Member	6	Collected evidence of teaching and community service activities.
P4	Administrative Staff (LPM)	10	Managed data entry, verification, and system uploads.
P5	Rectorate Representative	15	Supervised policy alignment and resource allocation.
P6	Internal Auditor	7	Reviewed reports and validated performance indicators.
P7	LAMDIK Assessor (External)	14	Provided feedback and mentoring on accreditation standards.
P8	Academic Affairs Coordinator	11	Integrated PD-Dikti and SPMI data for report consistency.

In addition to interviews, documentary data were collected from institutional records, including the *Laporan Evaluasi Diri* (Self-Evaluation Report), *Laporan Kinerja Program Studi* (Program Performance Report), internal quality assurance guidelines (SPMI manuals), meeting minutes, and correspondence with LAMDIK assessors. These documents were crucial in tracing the formal structure of implementation, verifying consistency between policy directives and practice, and corroborating statements from interview participants. The study also included non-participant observation during accreditation preparation meetings and internal review workshops to gain contextual understanding of organizational behavior.

### **3.4 Ethical considerations**

Ethical integrity formed a central component of the research process. Participants provided informed consent prior to interviews, and their identities were anonymized to maintain confidentiality. Institutional data were used strictly for academic purposes and stored securely with password protection. The research adhered to the ethical standards outlined by the Indonesian Ministry of Education and relevant institutional review policies. Reflexivity was maintained by continuously reflecting on the researcher's positionality as both observer and interpreter of institutional practice, acknowledging potential subjectivity in data interpretation.

### **3.5 Data analysis procedure**

Data were analyzed using NVivo 14 software following Creswell's (2018) iterative spiral model. The analysis proceeded through four phases: (1) data organization, where all interview transcripts were coded; (2) initial coding, identifying recurring concepts related to policy context, organization, and motivation; (3) theme development, where codes were clustered into higher-order categories aligned with Winter's dimensions; and (4) interpretive integration, linking empirical patterns to theoretical constructs (Creswell, 2018; Winter, 2003). Triangulation was achieved through cross-verification of interview data, document analysis (LAMDIK guidelines, institutional reports), and field observations to enhance validity.

### **3.6 Analytical framework and output**

The final stage of analysis integrated insights from Winter's policy implementation model with Argyris and Schön's learning framework to construct the Participatory and Integrated Implementation Model. This model synthesizes empirical findings into a conceptual representation of how external accreditation (LAMDIK) interacts with internal quality assurance systems (SPMI) through feedback and reflection mechanisms. The analytical output highlights both compliance-oriented and learning-oriented pathways of accreditation, demonstrating how institutional actors navigate between regulatory demands and adaptive capacity.

This model serves as the foundation for the subsequent section, which presents the empirical results and analytical discussion organized around Winter's three dimensions contextual, organizational, and motivational. Through this structure, the study reveals how policy implementation processes generate both obstacles and opportunities for institutional learning, contributing to the broader discourse on governance and quality assurance in post-transition higher education systems.

## 4 RESULTS AND DISCUSSION

The results are organized around Winter's (2003) three policy-implementation dimensions contextual, organizational, and motivational each representing key aspects of how LAMDIK-based accreditation operates in practice. To systematically analyze the implementation of LAMDIK accreditation at IKIP Widya Darma Surabaya, this study maps the seven core LAMDIK standards onto Winter's (2003) three-dimensional policy implementation framework. Table 2 illustrates how each accreditation standard ranging from vision and governance to quality assurance systems engages primarily with contextual, organizational, or motivational dimensions of implementation. This mapping reveals not only the multi-dimensional nature of accreditation requirements but also the predominant implementation challenges associated with each standard domain. The observed patterns in Table 2 demonstrate that while some standards (e.g., Vision and Governance) primarily involve organizational behavior, others (e.g., Human Resources) engage more directly with actor motivation, underscoring the interconnected complexity of accreditation implementation.

**Table 2**

*Mapping of LAMDIK Accreditation Standards to Winter's Policy Implementation Dimensions and Observed Institutional Patterns*

<b>LAMDIK Standard Domain</b>	<b>Policy Focus</b>	<b>Winter's Dimension</b>	<b>Observed Implementation Pattern</b>
Vision and Governance	Leadership and strategic direction	Organizational	Hierarchical decision-making limits participation.
Student and Graduate Outcomes	Achievement of learning outcomes	Contextual	National standards restrict curricular flexibility.

Human Resources	Faculty qualifications and development	Motivational	Intrinsic commitment among core staff; low institutional incentives.
Curriculum and Learning Process	Design and delivery of programs	Organizational	Fragmented coordination between departments and LPM.
Research and Community Service	Evidence of impact and collaboration	Contextual/Organizational	Limited funding and external partnerships.
Facilities and Infrastructure	Digital support and learning environment	Contextual	Manual data systems constrain efficiency.
Quality Assurance System (SPMI)	Internal monitoring and evaluation	Motivational/Organizational	Emerging reflective culture through benchmarking.

#### 4.1 Contextual dimension: policy framework and structural environment

The implementation of LAMDIK-based accreditation at IKIP Widya Darma Surabaya operates within a policy environment shaped by Indonesia's ongoing higher-education governance reforms. Since the establishment of independent accreditation bodies through *Permendikbudristek No. 53 of 2023*, institutions have been required to shift from input-based to outcome-based quality assurance (Peraturan Menteri Pendidikan, Kebudayaan, Riset, Dan Teknologi Republik Indonesia Nomor 53 Tahun 2023 Tentang Penjaminan Mutu Pendidikan Tinggi, 2023). Yet this transformation remains heavily centralized. Respondents noted that while LAMDIK provides structure, it also imposes rigid procedural expectations that constrain local adaptation. As one participant stated, *"The policy came fully designed from Jakarta; our task was only to execute it without much adaptation"* (P5, Rectorate Representative). This reflects the *political-administrative gap* described in Winter's (2003) policy-implementation theory, where policy intent and local capacity misalign (Winter, 2003). IKIP Widya Darma, as a small private institution, faces structural constraints limited funding, outdated digital infrastructure, and minimal staff training in accreditation technology. These conditions exemplify Winter's *resource-dependency factors*, restricting the ability of local implementers to innovate.

Socio-economically, the institution also faces unequal resource distribution compared with state universities, reducing its ability to invest in digital monitoring systems that enable evidence-based accreditation. The process still depends on semi-manual data entry for *Laporan Kinerja Program Studi (LKPS)* and *Laporan Evaluasi Diri*

(LED), which increases administrative workload. One administrative staff member explained, “*We still use Excel sheets and manual uploads; every revision requires re-entering data across systems*” (P4). Nonetheless, incremental adaptation is visible. The institution has formed a small internal quality-assurance task force to synchronize accreditation data with *Pangkalan Data Pendidikan Tinggi (PD-Dikti)*. This initiative demonstrates what Argyris and Schön (1978) describe as *single-loop learning* correcting operational errors without altering the underlying framework (Argyris & Schon, 1978). However, the absence of participatory dialogue with LAMDIK and policymakers still limits institutional learning and autonomy.

#### **4.2 Organizational behavior: coordination, leadership, and adaptive capacity**

At the organizational level, LAMDIK accreditation requires coordination among the Rectorate, Quality-Assurance Unit (*Lembaga Penjaminan Mutu* or LPM), departments, and administrative divisions. Field data reveal that these units often operate in silos. Meetings tend to focus on documentation deadlines rather than reflective evaluation. As one LPM staff member admitted, “*We are busy checking boxes, but rarely have time to discuss what the numbers mean*” (P3). This situation exemplifies Winter’s (2003) concept of *organizational inertia*, where institutions emphasize procedural compliance instead of adaptive learning. Although the LPM’s formal mandate is to integrate quality assurance, its practice remains administrative verifying forms and liaising with assessors rather than developmental. Leadership dynamics reinforce this pattern: decision-making remains hierarchical, and innovation is delayed until top-management approval.

These findings echo Budiman and Barata (2018), who identify top-down leadership as a barrier to quality culture in private universities (Budiman & Barata, 2018). In contrast, participatory models where academic and administrative actors jointly interpret quality standards achieve greater adaptability. Progress, however, is emerging. The LPM has initiated internal benchmarking comparing previous accreditation results to identify recurring weaknesses such as incomplete tracer-study data and weak community-service documentation. An internal auditor (P6) observed, “*We’re starting to treat accreditation not only as a requirement but as an opportunity to evaluate ourselves.*” Comparable systems in Malaysia’s MQA and the Philippines’ AACUP demonstrate

mentoring-oriented accreditation emphasizing reflection and improvement rather than mere compliance (Rahmaniati & Bulkani, 2022). Such models illustrate that organizational adaptation thrives when supported by structured peer-review and feedback mechanisms still limited in LAMDIK's current policy design. This regional shift toward developmental accreditation echoes the principles promoted by the ASEAN Quality Assurance Network (AQAN, 2021), which encourages feedback-based peer evaluation and collaborative quality enhancement across Southeast Asia (ASEAN QA Framework for Higher Education Institution, 2021).

### 4.3 Motivational dimension: actor commitment and learning orientation

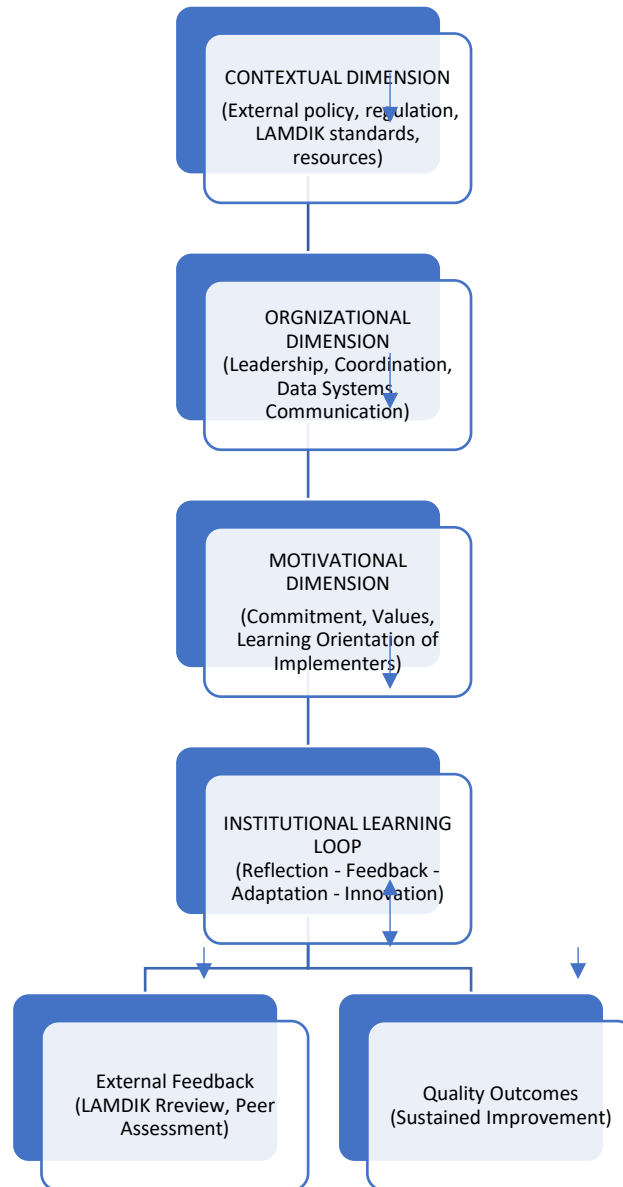
Winter's third dimension concerns actor motivation the perceptions, incentives, and sense of purpose driving policy outcomes. At IKIP Widya Darma, motivation divides between *compliance-based* and *learning-based* orientations. Most participants displayed compliance-driven behavior, performing accreditation tasks as obligatory routines. A lecturer explained, "*We do this because we must; it's part of survival for private institutions*" (P2). This illustrates Winter's (2003) *instrumental motivation*, where actions are guided by obligation rather than intrinsic goals. A smaller group mainly within the Quality-Assurance Unit expressed intrinsic motivation, viewing accreditation as an avenue for self-improvement. One participant noted, "*If we document our progress well, it helps us improve teaching quality and visibility*" (P1). This attitude reflects Argyris and Schön's (1978) *double-loop learning*, in which individuals reassess underlying assumptions and practices.

However, institutional structures offer little reinforcement. Reflective participation carries no tangible reward; accreditation tasks do not influence recognition or workload distribution. The lack of follow-up mentoring from LAMDIK assessors further weakens engagement, as accreditation visits remain high-stakes evaluations rather than developmental dialogues. Consequently, motivation is often reactive centered on document completion rather than quality enhancement. Comparative insights from Southeast Asia confirm that when accreditation systems integrate mentoring and feedback loops, motivation shifts from compliance toward professional pride (Rahmaniati & Bulkani, 2022). This underscores the potential for LAMDIK to adopt a participatory approach emphasizing learning and reflection. The contextual, organizational, and

motivational findings together highlight how policy, structure, and human agency interact dynamically in shaping accreditation practices an interaction that culminates in the integrative model presented below.

#### **4.4 Integrative analysis: the participatory and integrated implementation model**

Synthesizing the findings across all dimensions, this study proposes the Participatory and Integrated Implementation Model, conceptualizing accreditation as a cyclical interaction among policy context, organizational process, and actor motivation. Synthesizing the empirical findings across all three dimensions, this study proposes the Participatory and Integrated Implementation Model, which reconceptualizes accreditation as a cyclical, feedback-driven process rather than a linear compliance exercise. Figure 1 visualizes this model, illustrating how contextual factors (policy framework and resources), organizational behavior (coordination and leadership), and actor motivation (compliance versus learning orientation) interact dynamically through institutional learning loops. At the model's core lies the concept of reflective feedback the mechanism through which external LAMDIK standards are not merely adopted but internalized, evaluated, and adapted to local institutional contexts. The bidirectional arrows in Figure 1 represent these feedback flows, showing how accreditation outcomes inform subsequent cycles of quality improvement. This model extends Winter's (2003) implementation framework by embedding Argyris and Schön's (1978) organizational learning principles, thereby transforming accreditation from an episodic evaluation into a continuous improvement process.

**Figure 1***The Participatory and Integrated Implementation Model for LAMDIK-Based Accreditation*

This particular figure illustrates how contextual constraints contextual, organizational, and motivational dimensions within the accreditation process. Feedback loops enable continuous institutional learning, aligning external standards with internal quality-assurance practices.

At the model's core lies institutional learning a feedback-driven mechanism that transforms accreditation from compliance into reflection. Policy feedback occurs when external standards (LAMDIK instruments) are internalized through evaluation and

generate adaptive responses such as internal benchmarking, reflective workshops, and cross-unit collaboration. The effectiveness of these feedback loops determines whether an institution remains in a *compliance trajectory* or advances toward a *learning trajectory*. The findings affirm Winter's (2003) argument that implementation outcomes depend on the dynamic interplay of context, organization, and motivation (Winter, 2003). This model refines Winter's framework by embedding Argyris and Schön's (1978) learning loops, showing how reflective practice converts accreditation from an administrative ritual into a process of continuous institutional development (Argyris & Schon, 1978).

This study has several limitations that should be acknowledged to contextualize its findings. First, as a single-case qualitative study focused on IKIP Widya Darma Surabaya, the results may not fully represent the diversity of accreditation practices among Indonesian higher education institutions, particularly public and large-scale universities. While the case offers rich insights into the dynamics of policy implementation at smaller private institutions, generalizations should be made cautiously. Second, the analysis relied on eight key participants, which, although purposively selected for their strategic roles, may not capture all stakeholder perspectives within the accreditation ecosystem, such as regional LAMDIK assessors or policymakers. Third, the study's data were collected within one accreditation cycle, limiting its ability to capture longitudinal shifts in institutional learning or organizational culture. Future research could adopt multi-case or longitudinal designs to examine how iterative accreditation experiences reshape institutional adaptation and motivation over time. Despite these limitations, the study provides a theoretically grounded and empirically valid model that can guide both further research and practical policy design in higher education quality assurance.

The findings carry significant implications for theory, policy, and practice. Theoretically, this study extends Winter's (2003) policy implementation model by integrating it with Argyris and Schön's (1978) organizational learning theory, thereby reframing policy enactment as a process of institutional learning (Argyris & Schon, 1978; Winter, 2003). This synthesis contributes to a deeper understanding of how feedback loops, reflection, and motivation interact within accreditation systems, enriching policy implementation literature with insights from education governance.

Practically, the results suggest that LAMDIK and the Ministry of Education should move beyond evaluative procedures toward mentoring-based accreditation cycles that emphasize reflection and capacity building. Institutions, particularly smaller private LPTKs, are encouraged to embed reflective mechanisms such as post-accreditation reviews, peer learning sessions, and internal benchmarking to transform compliance into learning. Strengthening digital data integration between SPMI and PD-Dikti will also enhance coordination and transparency. Finally, capacity-building programs for assessors and institutional leaders should focus on participatory policy interpretation and continuous feedback culture to sustain quality improvement. Collectively, these implications affirm that accreditation reform in Indonesia can evolve from an administrative obligation into a developmental dialogue one that promotes genuine institutional growth and collaborative governance across the higher education landscape.

## 5 CONCLUSION

This study examined the implementation of LAMDIK-based accreditation in Indonesian higher education through the lens of Soren C. Winter's (2003) multi-level policy implementation model. The findings reveal that while the reform aspires to decentralize quality assurance, its practice remains shaped by centralization, limited institutional ownership, and uneven capacity among teacher training colleges. Using the case of IKIP Widya Darma Surabaya, this research demonstrates how contextual, organizational, and motivational factors interact to determine policy outcomes. At the contextual level, accreditation policy continues to reflect a top-down orientation that constrains institutional adaptation. Although LAMDIK promotes an outcome-based approach, its rigid structure and limited participatory formulation generate interpretive ambiguity. Organizationally, implementation remains dominated by hierarchical routines and fragmented coordination between units, resulting in procedural compliance rather than reflective learning. Yet emerging practices such as internal benchmarking and post-accreditation workshops indicate an incipient shift toward adaptive learning. Motivationally, most actors are driven by extrinsic compliance incentives, though a minority within the Quality Assurance Unit show intrinsic commitment to improvement, illustrating that reflective engagement can emerge even within bureaucratic settings.

By integrating Winter's model with Argyris and Schön's (1978) theory of organizational learning, this study reframes accreditation as a dynamic process of institutional learning. Policy success depends not merely on regulatory design but on how institutions internalize feedback, align structures, and cultivate reflective capacity. The proposed Participatory and Integrated Implementation Model emphasizes three strategic imperatives: participatory policy formulation, integrated digital assurance systems, and feedback mechanisms that transform evaluation into learning. Theoretically, this study bridges policy implementation theory and education governance, offering a conceptual model for understanding accreditation as both compliance and learning. Practically, it calls for a paradigm shift from accreditation as a control instrument to accreditation as a developmental dialogue. Institutions should view each cycle not as an endpoint but as an opportunity for collective reflection, while regulators such as LAMDIK should promote participatory mentoring and differentiated support to ensure contextual fairness. In essence, the future of accreditation reform in Indonesia lies in transforming its culture from doing accreditation *for approval* to doing it *for learning*. When institutions grow through reflection and feedback, accreditation becomes more than an evaluative ritual; it becomes the foundation of continuous institutional growth and academic excellence.

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### **Authors' Contribution**

All authors contributed equally to the development of this article.

### **Data availability**

All datasets relevant to this study's findings are fully available within the article.

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