EVALUATION OF THE IMPLEMENTATION FOREIGN OFFICIAL TRAVEL (PDLN) POLICIES (CASE STUDY AT THE THE AGENCY FOR MARINE AND FISHERIES EXTENSION AND HUMAN RESOURCES DEVELOPMENT)

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Abstract

Foreign Official Travel (PDLN) serves as a strategic instrument to enhance the capacity of Indonesia's civil servants and to support the national human resource development agenda. However, the significant state investment allocated to PDLN particularly at the Human Resource Development Agency for Marine Affairs and Fisheries (BPPSDM KP) often faces suboptimal implementation practices, potentially leading to budget inefficiencies and failures in performance accountability. This qualitative case study aims to analyze the implementation gaps in PDLN policy at BPPSDM KP using Merilee S. Grindle's framework, focusing on the dimensions of Content of Policy and Context of Implementation. The findings show that ineffective implementation is driven by the interaction of two key factors: (1) ambiguity in the Content of Policy, particularly the inconsistent interpretation of financial regulations (PMK) related to the calculation of Daily Allowances (Uang Harian), which repeatedly triggers findings by the Audit Board of Indonesia (BPK); and (2) critical weaknesses in the Context of Implementation, marked by low accountability as reflected in consistently high rates of delayed reporting (above 20% during 2022–2025) and the absence of a Knowledge Management System (KMS) to ensure institutional utilization of PDLN outcomes. To enhance efficiency and performance accountability, this study recommends strengthening a digital KMS and implementing mandatory Cost-Benefit Analysis for every PDLN proposal to ensure an adequate return on investment for the institution.

Keywords: Foreign Official Travel; Public Accountability; Budget Efficiency; Policy Implementation; Public Governance; BPPSDM.

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INTRODUCTION

Human resource development (HRD) is a national development priority, and Foreign Official Travel (PDLN) represents a vital mechanism for the government particularly within the Ministry of Marine Affairs and Fisheries (KKP) to enhance civil servant competencies, expand professional networks, and adopt global best practices. Through these functions, PDLN contributes to improving the quality of human resources in the marine and fisheries sector and supports the realization of good governance. As a state investment that involves budget allocation and a complex regulatory structure, the implementation of PDLN requires in-depth evaluation to ensure cost efficiency and alignment with institutional objectives. Despite being governed by a strict hierarchy of regulations from laws, ministerial regulations, to internal KKP policies field practice reveals significant implementation gaps. These gaps carry the potential to cause budget inefficiencies and hinder the achievement of strategic goals. The PDLN policy at BPPSDM KP is implemented through a multi-layered mechanism as mandated by Ministerial Regulation KP No. 48/2021. The process begins with submissions from Technical Implementation Units (UPT) to their respective Echelon II technical centres. These proposals are then forwarded to the Head of BPPSDM, with a copy to the Secretary. After receiving the disposition from the Head of BPPSDM KP, the Secretariat conducts administrative and substantive verification before submitting the proposals to the PDLN-managing unit at the KKP level.

Unit Kerja Eselon I	Baru (Disetujui)	Batal/Ditolak	Dalam Proses	Dikembalikan	Draft / Konsep	Ralat (Disetujui)	Grand Total
BPPMHKP	8	1	1		1	1	12
BPPSDMKP	30	2			1		33
PB	20		1			2	23
PDSPKP	15	1			1	2	19
PK	31			1	3		35
PKRL	5	3					8
PRL	16					4	20
PSDKP	27		1				28
PT	50	1	1	1	2		55
Setjen	32	8				2	42
Grand Total	**234**	**16**	**4**	**2**	**8**	**11**	**275**

Figure 1. Recapitulation of KKP PDLN Submissions for 2025
Source: (Public Relations and Foreign Cooperation Bureau, KKP Secretariat General, 2025)

As an Echelon I unit responsible for HR development, BPPSDM KP manages a relatively high volume of PDLN activities—33 proposals in 2025, of which 30 were approved (a 90.9% approval rate). This high approval rate indicates that, normatively (Content of Policy), proposals meet formal requirements, shifting the focus of implementation issues to the post-approval stage (Context of Implementation). Similar patterns were identified in the research of Dela Cruz & Santos (2020) in the Philippines, which revealed that ambiguity and regulatory overlap lead to excessive discretion and varied implementation practices across units. This phenomenon may also occur at BPPSDM KP, where inconsistencies between central PMK regulations and internal KKP rules potentially create unsynchronized practices. Further, Fuad et al. (2025) found that weak legal and oversight systems in Indonesia often open opportunities for fictitious travel, resulting in state financial losses—an extreme example of unclear policy content.
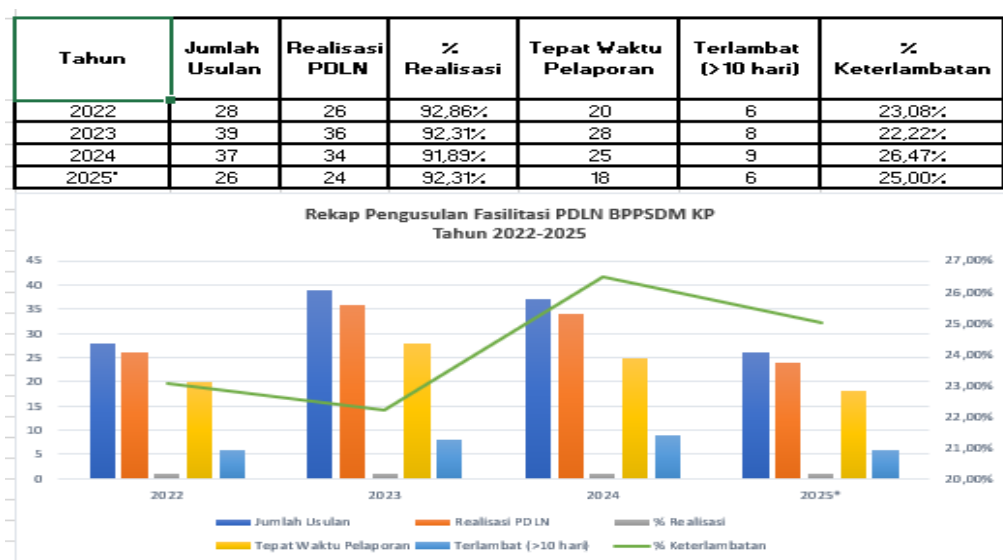
Tahun	Jumlah Usulan	Realisasi PDLN	% Realisasi	Tepat Waktu Pelaporan	Terlambat (>10 hari)	% Keterlambatan
2022	28	26	92,86%	20	6	23,08%
2023	39	36	92,31%	28	8	22,22%
2024	37	34	91,89%	25	9	26,47%
2025*	26	24	92,31%	18	6	25,00%

Figure 2. Recap of the 2022-2025 BPPSDM KP PDLN Facilitation Proposal
source: (BPPSDM Secretariat, 2025, processed by the author)

Although regulations are generally considered inadequate, based on data and field observations conducted at the BPPSDM Secretariat, the implementation of the PDLN policy still encounters obstacles within the policy implementation framework. Understanding implementation policies, Grindle (1980:7) states that implementation is a general process of administrative action that can be examined at a specific program level. Meanwhile, van Meter and Horn, quoted by Wibawa et al. (1994:15), state that policy implementation is an action carried out by the government and the private sector, both individually and in groups, intended to achieve goals. Grindle (1980:7) adds that the implementation process will only begin when goals and objectives have been determined, program activities have been prepared, funds have been prepared and distributed to achieve targets.
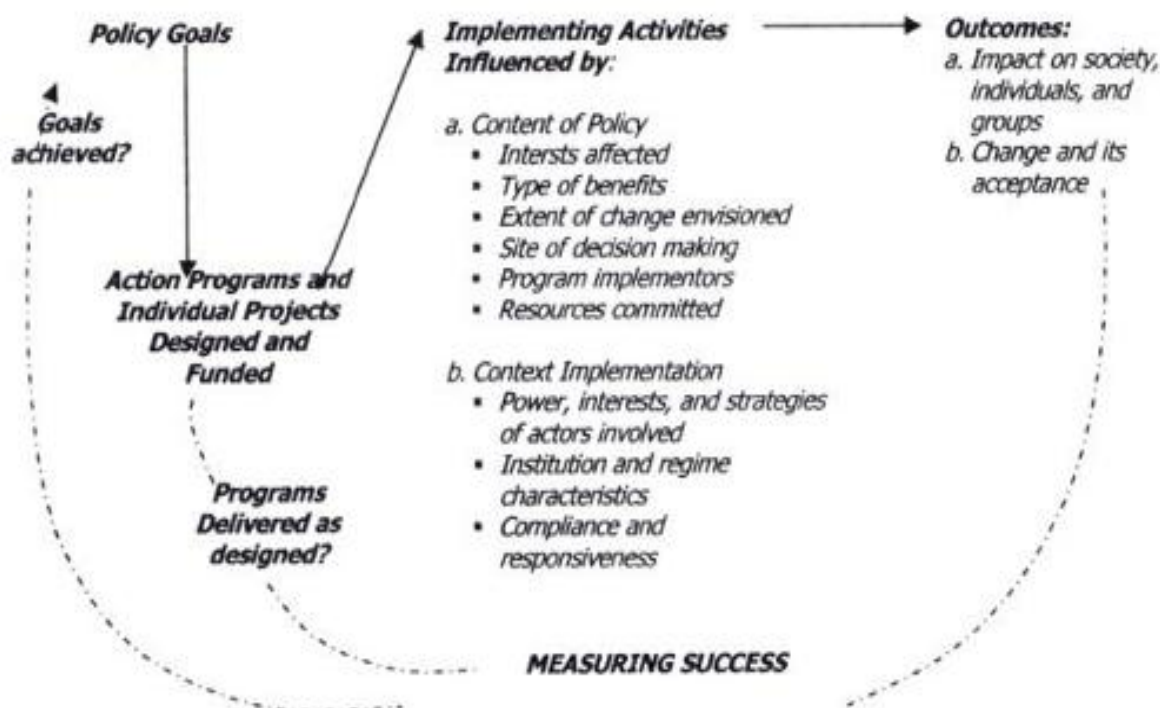
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Figure 3 Grindle Implementation Model
Source: (Merilee S. Grindle. 1980)

This issue reinforces the need to examine policy implementation through Merile S. Grindle's theory:

1. Issues related to policy content: although regulations are generally considered adequate, problems with policy content arise at the operational level, namely in the planning and selection of participants, which lacks objectivity. There are indications that not all PDLN are based on clear and measurable strategic needs analysis, but are instead driven by opportunity or budget availability. The participant selection process is reported to still leave room for improvement, lacking transparency, and not fully based on clear competencies or objective criteria. This condition shows that policy objectives at the operational level have the potential to deviate from the strategic mandate of human resource development.

2. Issues related to the context of implementation, where this aspect focuses on the environment and institutional capacity that influence policy implementation. The high volume of PDLN at BPPSDM KP directly highlights the following implementation challenges:

a) Institutional Capacity Weaknesses (Coordination and Approval).

The lengthy bureaucracy means that the PDLN approval process involves a multi-level, cross-unit workflow that is often disproportionately time-consuming. This significantly hinders implementation and timely execution. In addition, the lack of digital system support also means that BPPSDM KP still faces other challenges related to the lack of an integrated digital system to manage PDLN. The absence of a capable digital platform for submission, status tracking, and data storage not only slows down the process but also hinders transparency and accountability. This phenomenon reflects weaknesses in critical resources and support systems in the context of implementation.

b) Weak accountability mechanisms

In terms of reporting discipline and accountability. With an average reporting delay of more than 20% each year, this directly reflects fundamental weaknesses in reporting discipline and accountability mechanisms. These delays erode public and leadership trust and hinder the rapid integration of PDLN results into work programs. In addition, PDLN implementation reporting still focuses on administrative matters rather than outcomes. PDLN implementation reports tend to focus solely on fulfilling administrative obligations (recording attendance and budgets) and lack analysis. The reports are inadequate in examining the substance of the lessons learned and how best practices are translated and implemented in the context of the tasks of BPPSDM KP. Furthermore, there is a lack of long-term impact evaluation and knowledge management. A more fundamental problem is the absence of a structured long-term impact evaluation mechanism and a knowledge management system. As a result, the knowledge, insights, and networks gained often remain at the individual level and fail to become collective assets that support the performance improvement of the entire BPPSDM KP. This indicates a disconnect between the outputs of the PDLN and institutional outcomes, making it a critical issue in the context of implementation.

Based on the above explanation, the main issues identified and forming the basis of this study are:

1. Gaps in policy content, where this issue focuses on the clarity and consistency of PDLN policy objectives at the operational level of BPPSDM KP in the process of planning and selecting participants, which is not yet optimal. Ideally, every PDLN assignment should be a strategic investment based on a mature and sustainable analysis of human resource development needs. However, in practice, there are indications that not all PDLN assignments are based on clear and measurable strategic needs. There are concerns that PDLN activities are driven more by opportunity or budget availability than by urgency and relevance to improving specific competencies or achieving organizational targets.

2. Gaps in the context of implementation, where the problem focuses on weaknesses in the system, institutional capacity, and accountability mechanisms that support the implementation of PDLN policies at BPPSDM KP, such as:

   a. Weak operational capacity (coordination and approval) where, operationally, the process of obtaining approval for the implementation of PDLN often takes a disproportionate amount of time. The bureaucratic process involving cross-unit approvals (from the implementing unit, Echelon I, to the Secretariat General) is hierarchical and slow. This condition significantly hinders the implementation and timeliness of activities.

   b. Administrative and less analytical reporting, where currently, reports on the implementation of PDLN tend to focus solely on fulfilling administrative obligations (recording attendance, activities, and budget utilization), rather than serving as a learning tool. As a result, the reports produced are often lacking in analysis and do not adequately explore the substance of the lessons learned and potential best practices that can be implemented in the context of the tasks and functions of BPPSDM KP.

   c. The utilization of PDLN results is limited to the individual level, even though each PDLN produces valuable assets such as new knowledge and expanded international partnership networks. Observations show that these assets often remain at the individual level, with no mechanism in place to ensure that the knowledge, insights, or partnership networks are systematically and evenly distributed to other work units that need them.

   d. The absence of a structured knowledge management system. The absence of an official platform specifically designed to store, organize, and facilitate access to all reports and results of PDLN. As a result, the potential investment that has been spent to finance these trips is not being maximized for the overall institutional capacity development of BPPSDM KP.

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This study aims to analyze the factors that have prevented the optimal implementation of PDLN policies at BPPSDM KP, as well as to formulate strategic recommendations to improve the implementation of PDLN policies. Thus, this study not only seeks to find out what has been done, but also measures the conformity between existing policy norms and the reality of implementation in the field. The results are expected to provide a complete picture of the implementation, efficiency, and accountability of the PDLN administration policy, as well as provide input in the form of strategic recommendations for BPPSDM KP to improve the governance of the PDLN administration policy implementation at BPPSDM in the future.

LITERATURE REVIEW

Previous studies examining the evaluation of official travel policy implementation (both overseas and domestic) show a consensus that policy success is greatly influenced by two main pillars: (1) Clarity of Policy Content and (2) Capacity and Mechanisms in the Field (Context of Implementation), in line with Merile S. Grindle's implementation theory framework. A review of several relevant studies, both international and domestic, shows that the issues of budget efficiency and performance accountability are global challenges in the governance of public sector business travel.

1. Studies Related to Policy Content and Financial Accountability

The issue of regulatory clarity and its impact on implementation consistency is a recurring finding. Dela Cruz & Santos (2020), in the context of the Philippines, explicitly found that inconsistencies and ambiguities in PDLN regulations led to excessive discretion and variations in implementation between work units. Clarity of policy content is identified as a fundamental prerequisite for uniform and effective implementation. This finding is reinforced by Mahfudin et al. (2025), who focused on Daily Allowances (UH) for domestic business trips; this study concluded that the establishment of cost standards is not yet fully effective and efficient, indicating the need for improvements in cost-setting policies. Comparison with this Study: Both studies directly reinforce the key findings in this study regarding the ambiguity of financial regulations (PMK) related to the calculation of Daily Allowances (UH), which is the source of audit findings and disrupts financial accountability at BPPSDM KP. This study provides specific evidence that this weakness in the Content of Policy also occurs in the context of PDLN in Indonesia.

2. Studies Related to Institutional Capacity and Implementation Efficiency

Institutional capacity, in terms of human resources, systems, and resource allocation, has proven to be a strong predictor of implementation success. Tan & Chen (2021) in Singapore showed that high institutional capacity (trained human resources and integrated systems) enables fast, accurate, and highly efficient PDLN decisions. Similarly, Lee & Kim (2022) in a comparative study in Korea, emphasized that institutional capacity (including monitoring and training systems) is a strong predictor of policy compliance and cost efficiency. Digitalization efforts are also highlighted, with Rudzikyani et al. (2025) finding that the implementation of digital applications such as SIPANAS can improve the management of official travel, although its success remains influenced by human resources and infrastructure factors. Zulkifli & Ahmad (2019) in Malaysia added a holistic evaluation perspective, in which they found that efficiency often suffers due to lengthy bureaucratic processes and weak coordination. They also highlighted that evaluations focusing on the impact (outcome) of PDLN are still weak compared to those focusing solely on outputs. Comparison with This Study: These findings are crucial because this study found that BPPSDM KP faces problems of bureaucratic inefficiency and, most importantly, the absence of a Knowledge Management System (KMS) and outcome-based evaluation. This study reinforces the recommendation to strengthen institutional capacity through the digitization of KMS and the application of outcome-based Cost-Benefit Analysis evaluation, in line with the findings of Lee & Kim and Zulkifli & Ahmad.

3. Studies Related to Accountability and Oversight Mechanisms

The issue of post-implementation accountability and the role of external/internal oversight has been the main focus of several studies. Rani & Sharma (2023) from India, based on Principal-Agent Theory, identified significant weaknesses in reporting discipline and follow-up on audit results. Weak sanction mechanisms make PDLN expenditures vulnerable to irregularities. Meanwhile, Fuad et al. (2025) emphasize the role of the legal system, finding that weaknesses in the legal and oversight systems contribute to state financial losses due to fictitious business trips. From the internal oversight perspective, Lumempouw et al. (2021) show that the Government Internal Supervisory Agency (APIP) plays an important role, but its implementation is still limited by structural and technical factors.

Comparison with This Study: These findings directly support the findings of this study regarding the high percentage of late reporting (above 20%) at BPPSDM KP, which is a clear reflection of the lack of reporting discipline and weak sanction mechanisms, as identified by Rani & Sharma.

Based on a review of previous studies, the research conducted at BPPSDM KP has the following position:

1. Synthesis of the Two Pillars of Implementation: This study comprehensively applies Grindle's framework (Content of Policy and Context of Implementation) to analyse PDLN issues, which is a synthesis of Dela Cruz & Santos' (2020) focus on policy content, with Lee & Kim's (2022) and Rani & Sharma's (2023) focus on the aspects of implementation context, efficiency, and accountability.
2. Critical Focus on Knowledge Management and Outcomes: Unlike previous studies that mostly focused on issues of cost compliance and outputs (number of trips), this study critically highlights institutional failures in integrating PDLN results through the absence of a Knowledge Management System (KMS). This addresses the weakness identified by Zulkifli & Ahmad (2019) regarding the weakness of outcome-based evaluation in government agencies.
3. Case of Double Inefficiency: This study presents evidence that inefficiency and accountability at BPPSDM KP are the result of the interaction between the "gray area" of financial regulations (Content of Policy) and the deficit in reporting discipline/utilization of results (Context of Implementation).

The research framework is based on Merile S. Grindle's (1980) theory, which identifies that the success of policy implementation is determined by two main aspects, namely the content of policy and the context of implementation. Based on a literature review and problem identification, the three main points of policy implementation evaluation that are the focus of this study are direct derivatives of Grindle's two aspects:

1. Clarity of Policy Content represents the Content of Policy aspect;
2. Institutional capacity and accountability and oversight mechanisms represent the Context of Implementation aspect.

These three factors are considered to be interrelated and form a comprehensive analytical framework for assessing the extent to which PDLN policies at BPPSDM KP have been implemented effectively and in line with good governance principles. By integrating these three key points into Grindle's framework, this research framework is expected to provide a comprehensive picture of the implementation of PDLN policies at BPPSDM KP, while also identifying obstacles and opportunities for improvement in the implementation process. The evaluation results are expected to produce applicable policy recommendations to strengthen PDLN governance.

The developed conceptual framework is expected to assist researchers in conducting an evaluation study of policy implementation in the administration of PDLN at BPPSDM KP. The research conceptual framework is described as follows:
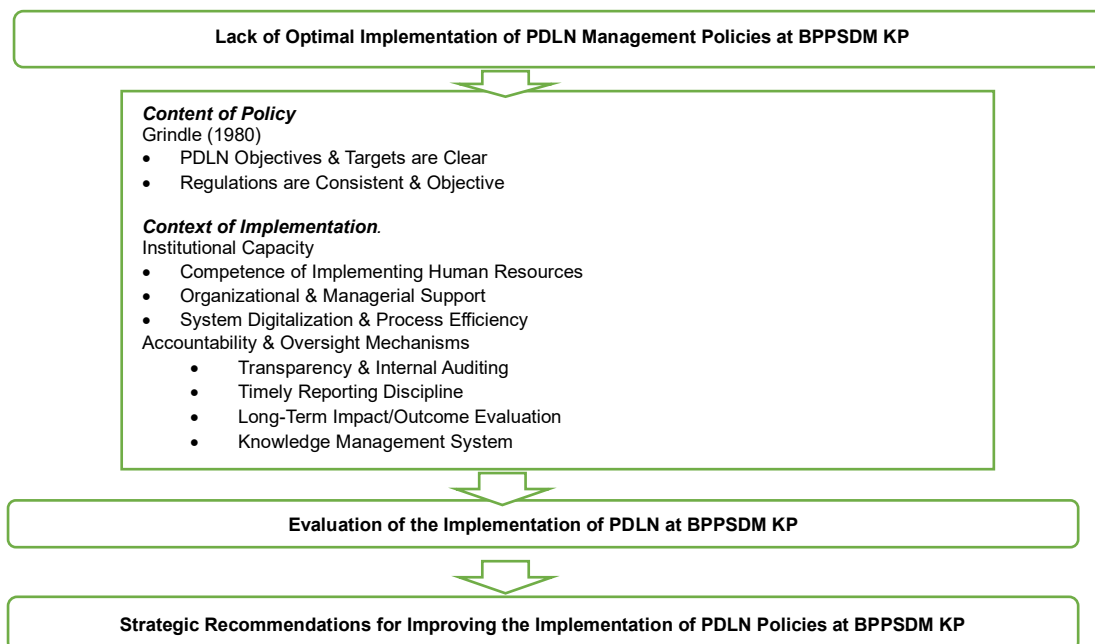

Figure 4. Research Framework
Source: (Grindle, 1980, adapted by the author)

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METHODOLOGY

This study uses a qualitative approach with a case study method. Case studies were chosen because they are relevant for exploring in depth the implementation process of PDLN policies, which are complex, involve many actors, and are influenced by the institutional context of the KKP bureaucracy. Analytical Framework: This study uses Merile S. Grindle's policy implementation evaluation model, which focuses on two main variables:

1. Content of Policy: Examines the clarity and consistency of PDLN regulations (e.g., clarity of financial rules).
2. Context of Implementation: Examining the environment, institutional capacity (bureaucratic processes and systems), and accountability mechanisms that influence implementation.

Data Sources:

1. Primary Data: Interviews with key informants (officials and technical staff) at BPPSDM KP.
2. Secondary Data: Official documents, including: Recapitulation of BPPSDM KP PDLN Proposals for 2022–2025; PDLN Budget Realization for 2022–2025; and BPK Audit Findings on PDLN Implementation for 2023–2025.

RESULTS AND DISCUSSION

The research findings show that the implementation of the PDLN policy at BPPSDM KP has not been optimal due to critical interactions between weaknesses in the Content of Policy and Context of Implementation.

1. **Policy Content Gap: Ambiguity in Financial Accountability**
   Although PDLN regulations are generally considered adequate, there are substantive weaknesses in terms of policy content clarity, particularly with regard to financial accountability. BPK audit data (2023–2025) consistently finds discrepancies between the Daily Allowance (UH) paid and what should have been paid. This problem stems from different interpretations of the Minister of Finance Regulation (PMK) regarding the calculation of the daily allowance percentage (40% vs. 100%) given during travel/transit. The implementing agency and the auditor have different interpretations of the conditions that entitle employees to 100% DA. Economic-Administrative Implications: This grey area not only leads to audit corrections but also creates inconsistencies in administrative practices, which in turn threaten the credibility of governance and bureaucratic accountability.

2. **Weaknesses in the Context of Implementation: Deficit in Performance and Institutional Accountability**
   Weaknesses in the Context of Implementation at BPPSDM KP are characterized by institutional capacity inefficiencies and weak accountability mechanisms. Institutional Capacity Inefficiencies: The high volume of PDLN (33 proposals in 2025) requires strong human resources and systems. However, the multi-level bureaucratic proposal and approval process (internal KKP, Ministry of Finance, and Ministry of State Secretariat) is often hampered by suboptimal management system capacity. This condition causes structural inefficiency and hinders the smooth running of the process.

   Performance Accountability Deficit
   a. Delayed Reporting: Data shows weaknesses in reporting discipline in the form of consistent delays of over 20% each year (2022: 23.08%; 2024: 26.47%; 2025: 25%). This weakness directly indicates problems with the post-activity accountability mechanism.
   b. Administrative Monitoring: The post-PDLN monitoring mechanism only focuses on the fulfillment of administrative reports, not on the evaluation of the quality or substantive impact (outcome) of activities. The majority of reports produced are only oriented towards administrative compliance and lack analysis, thus failing to explore the substance of learning and potential best practices.
   c. Low Utilization of Results: The most critical issue in terms of implementation is the utilization of PDLN results, which is limited to the individual level. Although PDLN produces valuable assets (knowledge and networks), there is no mechanism to ensure that this knowledge is systematically distributed to other work units. This is exacerbated by the absence of a structured Knowledge Management System (KMS). As a result, the potential of the budget investment that has been spent is not maximally utilized for the overall institutional capacity development of BPPSDM KP.

CONCLUSION

Based on the results of the research described above, it can be concluded that the cause of the suboptimal implementation of the PDLN administration policy at BPPSDM KP is due to critical interactions and weaknesses in

two dimensions of policy implementation, namely the content of policy and the context of implementation. Recommendations can be made to improve the implementation of the PDLN administration policy at BPPSDM KP. The cause of the suboptimal implementation of the PDLN administration policy at BPPSDM KP is due to a complex implementation gap, which is the result of a critical interaction between the ambiguous content of policy and the inefficient and non-accountable context of implementation, according to Grindle's (1980) theoretical framework. Specifically, the factors causing the suboptimal implementation of the PDLN policy are:

1. The weakness in terms of policy content is that although the regulatory framework for PDLN implementation is available in normative terms, the weakness lies in translating strategic objectives into objective operational criteria. This leads to a high risk of discretion in the planning and selection process for participants. The content of the policy fails to explicitly bind the PDLN determination process to a clear and measurable organizational competency needs basis, so that implementation tends to be driven by opportunity or budget availability.

   Meanwhile, weaknesses in the context of implementation are structural in nature and can be divided into two main areas:

2. Inefficient context (institutional capacity), where the institutional capacity of BPPSDM KP is hampered by inefficient bureaucratic processes involving lengthy, multi-level approval procedures and the lack of an integrated digital system for PDLN management. This condition is a clear manifestation of a bureaucratic structure that is not yet adaptive, which directly reduces cost and time efficiency.

3. Weak accountability and oversight mechanisms, where post-PDLN accountability mechanisms have experienced a double failure with the discovery of consistent reporting delays (>20%), indicating low formal accountability and discipline of implementers towards the set deadlines. In addition, there is a failure in knowledge transfer, where reporting focuses only on administrative compliance and there is no formal KMS, which has the potential to hamper the knowledge transfer process. As a result, PDLN investments fail to transform from individual outputs into collective outcomes that have a strategic impact on improving the overall institutional capacity of BPPSDM KP.

STRATEGIC RECOMMENDATIONS

Recommendations for optimizing the implementation of PDLN policies at BPPSDM KP based on Grindle's theory cover three aspects, namely:

a. Clarity of Policy Content (Overcoming Ambiguity and Inconsistency), this strategy focuses on standardizing and affirming rules to eliminate multiple interpretations through:
   1) Standardizing Procedures by developing integrated PDLN SOPs that include competency-based participant selection criteria, approval processes, and activity feasibility indicators linked to organizational KPIs.
   2) Reaffirming Financial Regulations by developing Technical Guidelines for Internal KKP PDLN Financing to address multiple interpretations of Daily Allowance (UH) rates and travel expenses, thereby reducing the risk of audit findings.
   3) Needs-Based Planning through the implementation of a participant selection system based on annual Training Need Assessment and KPIs, as well as requiring each PDLN application to include justification of its relevance to KKP priority programs.

a. Institutional capacity to improve efficiency and professionalism. This strategy focuses on strengthening human resources and organizational support through:
   1) Improving human resource competencies by conducting quarterly training and coaching clinics focused on PDLN administration, document preparation, and outcome-based reporting.
   2) Integrating coordination by forming an Integrated PDLN Working Team between units (Finance, Cooperation, Human Resources) and holding regular coordination meetings to ensure that business processes run smoothly and eliminate dependence on informal coordination.
   3) System Digitalization by developing an Integrated PDLN Digital System (Internal Apps) with status tracking features, a report repository, and integration with external systems (Simpel Setneg) to support a one-gate system.
   4) Knowledge Management by establishing a KMS system and requiring knowledge sharing after the implementation of PDLN, with outcome-based reporting formats, to transform individual activity results into institutional knowledge assets.
   5) Budget Efficiency by applying value for money/cost-benefit analysis evaluations to each PDLN proposal to ensure that the benefits of the activity are commensurate with the costs incurred.

b. Accountability and Oversight Mechanisms (Creating Transparency and Performance). This strategy focuses on accountability and enforcement of rules, including:
1) Transparency in Selection by formulating objective and written selection criteria (competency-based) and requiring open publication of opportunities and lists of successful participants along with justifications (fairness).
2) Strengthening Monitoring and Evaluation Functions by developing a standardized Post-Travel Evaluation System and outcome-based reporting format that includes learning analysis, follow-up plans, and contributions to unit KPIs.
3) Performance Oversight by encouraging APIP to conduct special audits of PDLN, implementing a reward and punishment mechanism for tracking the utilization of PDLN outcomes, and strengthening the role of the BPPSDM Secretariat as a clearing house and center for PDLN governance.

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