



Navigating State Recognition and Autonomy: The Independent Quality Assurance Model of Islamic Pesantren Post-UU No. 18/2019

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ABSTRACT

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This study aims to examine how the independent quality assurance model established by Law No. 18 of 2019 mediates state recognition and pesantren autonomy, identifies implementation challenges, and proposes safeguards for sustainable governance. Employing a qualitative normative-juridical design, the study analyses legislation, ministerial regulations, official communications, media reports, and 35 scholarly articles published between 2024 and 2026. Data were examined through document analysis, thematic coding, source triangulation, and cross-document comparison. The findings reveal two central issues. First, quality assurance facilitates the civil recognition of pesantren qualifications, but its benefits remain unevenly distributed, with administrative compliance potentially disadvantaging smaller institutions and marginalising distinctive scholarly traditions. Second, institutional independence remains vulnerable to technocratic assessment, curricular dominance, financial dependence, political influence, and concentrated leadership authority. The study proposes the Recognition–Autonomy–Assurance (RAA) framework, comprising peer legitimacy, dual-indicator assessment, funding and appointment safeguards, differentiated developmental support, and evidence-based continuous improvement. The framework offers practical guidance for policymakers and pesantren leaders. Future empirical research should evaluate its applicability across diverse institutional and regional contexts.

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INTRODUCTION

Pesantren are not only longstanding Islamic educational institutions; they are also significant providers of education, religious guidance, and community empowerment in Indonesia. Their governance therefore matters beyond the institutions themselves, affecting educational access, public trust, graduate

recognition, and the relationship between religious communities and the state. Ministry of Religious Affairs data cited by Arifin and Sulaeman (2026) record approximately 39,551 pesantren and 4.9 million santri in the first semester of the 2023/2024 academic year. This scale makes quality assurance a public concern. Yet effective oversight must protect educational standards without displacing pesantren's scholarly traditions and institutional authority. A legitimate system must therefore balance accountability with autonomy across diverse local contexts.

The central problem is that formal recognition can create new dependencies. When pesantren seek recognised educational pathways, equivalent diplomas, funding opportunities, and wider acceptance of graduates, they must demonstrate compliance with state-defined requirements. Such requirements can improve transparency and consistency, but they may also privilege documentation, managerial procedures, and uniform indicators over distinctive forms of Islamic scholarship. Before 2019, madrasah diniyah mu'adalah relied on ministerial-level regulations and were often treated as out-of-school education, restricting their formal standing and access to policy support (Istiqomah & Arifi, 2026; Rahmania et al., 2025). The challenge is consequently not recognition alone, but how recognition can be secured without weakening institutional self-governance and cultural continuity.

This tension became more visible after Law No. 18 of 2019 on Pesantren established a statutory basis for recognition, affirmation, and facilitation (Hasibuan et al., 2026; Syarifah & Munandar, 2025). Its implementing regulations, including Minister of Religious Affairs Regulations Nos. 30, 31, and 32 of 2020, specify arrangements for registration, educational pathways, and quality assurance. The law provides for internal assurance through a Dewan Masyayikh led by the kiai and national-level functions through the Majelis Masyayikh, an independent body of ulama. In principle, this two-tier structure allows pesantren to participate in quality governance while retaining religious authority. In practice, its capacity to preserve independence requires closer examination without external substitution.

Previous research has examined the law's recognition agenda and its implications for pesantren governance (Siregar et al., 2025; Syarifah & Munandar, 2025; Thontawi & Huriati, 2024; Zuhdi et al., 2024). Other studies investigate quality assurance and accreditation within particular institutions (Hani' et al., 2025; Lathifah et al., 2025; Umam et al., 2024). Together, these studies establish that legal recognition and quality standards are consequential for development. However, policy analysis and institution-specific accounts do not explain how an independent quality assurance architecture mediates the relationship between state authority and pesantren autonomy. The governance mechanism connecting these two objectives remains insufficiently examined, limiting understanding of how statutory principles operate in institutional practice.

Other scholarship identifies risks arising from implementation. Hasibuan et al. (2026) and Thontawi and Huriati (2024) highlight bureaucratisation, uneven human-resource capacity, and the possible erosion of autonomy under uniform administrative standards. Istiqomah and Arifi (2026) describe a divergence between the law's protective intent and the selective effects of implementing regulations as policy drift. Research on Ma'had Aly likewise argues that accreditation can prioritise managerial and documentary indicators over *turats* and the authority of the *kiai* (Arifin & Sulaeman, 2026; Munifah et al., 2025). These findings reveal tensions, but they do not fully establish which institutional safeguards can preserve independence while maintaining credible, publicly accountable quality assurance in institutional practice.

The state of the art of this study is to analyse independent quality assurance as a governance arrangement rather than merely a technical accreditation procedure. The distinction matters because the Dewan Masyayikh and Majelis Masyayikh are intended to mediate state recognition through ulama-led standards, internal evaluation, and nationally coordinated criteria. A systematic review of pesantren scholarship from 2014 to 2024 found a stronger emphasis on modernisation, curriculum integration, and institutional contribution (Arif et al., 2024), indicating room for analysis of quality-assurance governance. This study contributes by connecting statutory design, implementation since 2024, and threats to independence within one analytical framework, thereby clarifying how autonomy may be institutionally protected more effectively.

Accordingly, this study asks three questions: how has the independent quality assurance model been designed and operationalised since 2024; how does it mediate the civil effects of state recognition; and what threatens its independence, and which design principles could protect it? The argument is that independent assurance can reconcile recognition and autonomy only when authority, standards, and assessment remain grounded in pesantren scholarship, while procedures are transparent and accountable. Formal independence alone is insufficient if implementation encourages documentary compliance, concentrates decision-making, or leaves institutions without adequate capacity. By examining these conditions, the article seeks to explain when the model can support recognition without assimilating pesantren into a uniform state-led system.

RESEARCH METHODS

This study employs a qualitative, normative-juridical design supported by document analysis. This approach was selected to examine the legal foundations, governance arrangements, and implications of independent quality assurance for pesantren autonomy without conducting new fieldwork. The study focuses on

the national regulatory and institutional context governing Indonesian pesantren, particularly Law No. 18 of 2019 and its implementing regulations, because the relationship between state recognition and institutional autonomy is shaped by national legislation and the respective roles of the Dewan Masyayikh and Majelis Masyayikh. The documentary materials comprise three categories: primary legal materials, including Law No. 18 of 2019, Minister of Religious Affairs Regulations (PMA) Nos. 30, 31, and 32 of 2020, and the 2024 ministerial instrument on Ma'had Aly quality assurance standards as discussed by Arifin and Sulaeman (2026); official communications from the Majelis Masyayikh and the Ministry of Religious Affairs reported in national media between November 2024 and May 2026; and 35 scholarly articles published between 2024 and 2026.

Data were collected through documentary research using keyword searches in open-access journal portals and academic repositories. The search terms included pesantren law, Majelis Masyayikh, quality assurance, accreditation, *Ma'had Aly*, *mu'adalah*, and *kiai authority*. Backward citation tracking from recent publications was also conducted to identify relevant literature. Documents were selected based on their relevance to the research questions, publication period, and contribution to understanding legal recognition, quality assurance governance, institutional autonomy, and implementation capacity. The collection process considered who produced each document, what legal provisions or institutional activities it addressed, when it was issued or published, where it was published or institutionally situated, why it was relevant to the research objectives, and how it contributed to understanding the governance framework. Data analysis followed the stages of data condensation, data display, and conclusion drawing and verification, following Miles, Huberman, and Saldaña. The materials were coded into four thematic dimensions: recognition and civil effects, quality assurance architecture, autonomy risks, and capacity and equity. Comparisons across documents were then conducted to identify convergences, contradictions, and gaps in the available literature.

Data trustworthiness was addressed through source triangulation, cross-document comparison, and verification against the relevant legal texts. Statutory provisions were distinguished from scholarly interpretations and media-reported institutional activities to ensure that secondary accounts were not treated as direct legal evidence. Claims were checked for consistency across different source types, while contradictory interpretations and gaps in the documentation were retained for critical examination. An analytical audit trail was maintained by linking thematic interpretations to their documentary sources and examining whether the proposed conceptual framework followed logically from the available evidence. Nevertheless, the study has two principal limitations. First, some scholarly sources rely on secondary literature or single-

case studies, potentially limiting the breadth of the available evidence. Second, media reports may reflect the institutional framing of the organisations concerned. Because the study does not use new field data, its findings constitute a normative and conceptual synthesis rather than an empirical evaluation or causal demonstration. The resulting propositions should therefore be understood as analytical arguments requiring further examination through field-based research.

RESULTS AND DISCUSSION

Results

Legal Recognition and the Boundaries of Pesantren Autonomy

Analysis of Law No. 18 of 2019 reveals that legal recognition of pesantren operates through multiple, interconnected dimensions rather than a single act of formal acknowledgement. Istiqomah and Arifi (2026) identify functional legitimacy under Article 4, typological legitimacy under Article 5(1), structural legitimacy under Article 15, and graduate recognition under Article 19. These provisions are complemented by institutional autonomy under Article 8(2), methodological autonomy under Article 13(2), and curricular autonomy under Article 16(1). Collectively, these provisions establish a legal framework that recognises pesantren as educational institutions with distinctive organisational structures, pedagogical traditions, and intellectual commitments. The protection of classical Islamic learning methods, including *sorogan* and *bandongan*, further demonstrates that recognition is not intended to require conformity with conventional schooling. As interpreted by Istiqomah and Arifi (2026), the underlying principle is recognition without assimilation: the state acknowledges pesantren's institutional distinctiveness while providing a statutory basis for their participation in the national education system. Nevertheless, the practical protection of autonomy depends on how this principle is translated into eligibility requirements and quality assurance arrangements.

The inclusiveness of this recognition framework is qualified by the eligibility criteria established in Article 5(2) of Law No. 18 of 2019. To qualify as a pesantren, an institution must possess five essential elements: a kiai or equivalent teacher, resident santri, a dormitory, a mosque or prayer hall, and the study of *kitab kuning* or Islamic studies through the *muallimin* pattern. Istiqomah and Arifi (2026) identify a tension between the inclusive orientation of Articles 4 and 15 and the selective effect of these minimum requirements. Although the Law recognises institutional diversity, access to formal legal recognition remains contingent on satisfying a prescribed institutional configuration. This creates a distinction between the general recognition of pesantren as a legitimate educational tradition and the legal eligibility of particular institutions to receive that recognition. Institutions that do not satisfy the specified criteria may

consequently face uncertainty regarding their formal status and access to associated institutional benefits. The findings therefore indicate that the boundary of pesantren autonomy is shaped not only by subsequent quality assurance but also by the eligibility conditions through which legal recognition is initially granted.

Within this regulatory framework, recognition is operationalised through several educational pathways, including Satuan Pendidikan Muadalah (SPM), Pendidikan Diniyah Formal (PDF), Ma'had Aly, and non-formal pesantren education with equivalence arrangements. Among these pathways, Ma'had Aly provides a particularly relevant context for examining the relationship between institutional recognition and academic autonomy. Niam et al. (2025) conceptualise Ma'had Aly as a vehicle for intellectual development and scholarly independence within pesantren, while Supriyanto et al. (2025) and Rahmadani and Nurhidin (2025) examine how it negotiates the relationship between inherited Islamic traditions and modern higher education. Nashiruddin et al. (2025) further investigate curriculum innovation in the reproduction of ulama cadres at a Ma'had Aly in Sarang. Taufiq (2024), as cited by Arifin and Sulaeman (2026), reports approximately 45 licensed Ma'had Aly. Its recognised higher-education status and exposure to accreditation requirements make this pathway particularly significant for understanding how formal accountability interacts with the preservation of scholarly traditions. Ma'had Aly therefore provides an analytically important setting for assessing whether institutional recognition strengthens pesantren education without displacing its distinctive intellectual authority.

The Architecture of Independent Quality Assurance

Law No. 18 of 2019 establishes a two-tier quality assurance architecture that distributes responsibilities between the institutional and national levels. At the institutional level, Article 27 assigns the Dewan Masyayikh, led by the kiai, responsibilities for curriculum development, learning organisation, educator competence assessment, graduation examinations *imtihan*, and reporting graduate data to the national body. At the national level, Articles 28–29 establish the Majelis Masyayikh as an independent body of ulama responsible for developing the basic curriculum framework and structure, formulating quality criteria for institutions and graduates, conducting assessment and mapping, and validating the authenticity of *syahadah* (Istiqomah & Arifi, 2026). This distribution of responsibilities distinguishes the model from arrangements in which quality standards and assessments are controlled exclusively by external administrative authorities. Its institutional logic is based on scholarly participation and peer-based evaluation, positioning *ulama* as central actors in defining and assessing educational quality. However, the allocation of formal responsibilities alone does

not establish that independence is secured in practice. The model's effectiveness ultimately depends on whether these bodies possess sufficient authority, institutional capacity, and discretion to exercise their respective mandates without undermining the diversity of pesantren educational traditions.

A defining feature of this architecture is the protective purpose assigned to quality assurance. Article 26(2)(a), as analysed by Istiqomah and Arifi (2026), frames the system as a mechanism for safeguarding the autonomy and distinctiveness of pesantren education. Quality assurance is therefore intended not merely to verify compliance but also to protect the institutional characteristics that justify pesantren's distinctive legal recognition. This orientation corresponds with scholarship emphasising the cultural and pedagogical foundations of pesantren quality. Hamdanah et al. (2025) highlight the significance of kiai leadership in shaping institutional reputation, while Pahlawati et al. (2025) emphasise *ta'dib*, or character formation, alongside competence as a dimension of educational quality. Iskandar et al. (2025) similarly underscore the importance of communal practices, including equality and mutual care, that may not be adequately captured by standardised administrative indicators. Taken together, these perspectives suggest that quality assurance must accommodate both assessable educational outcomes and the formative processes through which pesantren reproduce their scholarly and ethical traditions. The central analytical finding is that the model's protective ambition depends on aligning accountability mechanisms with these substantive dimensions of quality. Where assessment privileges documentary compliance over intellectual formation, communal practice, and scholarly authority, quality assurance risks contradicting the autonomy it is legally intended to preserve.

Recognition, Quality Assurance, and the Uneven Distribution of Civil Benefits

The implementation of Law No. 18/2019 on Pesantren indicates that the recognition and quality assurance architecture has begun to operate, although its institutional coverage and capacity to protect pesantren autonomy remain uneven. In November 2024, the Majelis Masyayikh conducted technical guidance on the quality assurance system for Pendidikan Diniyah Formal (PDF) in Jakarta, attended by 145 participants, including representatives of 35 PDF pesantren. Its chair, KH Abdul Ghaffar Rozin, emphasised that quality assurance should strengthen educational quality without sacrificing the distinctive character of pesantren (Metro TV, 2024). On 9 December 2025, the Majelis Masyayikh handed over decrees and certificates following assessments conducted during 2025 involving 92 educational units, comprising 67 primary and secondary education units and 25 Ma'had Aly institutions. The assessments addressed graduate competency standards, curriculum, institutional governance, learning quality, educator competence, and the implementation of scholarly traditions, under the

principle of continuous quality improvement (iNews, 2025). In May 2026, the Ministry established a selection team, known as AHWA, to select Majelis Masyayikh members for the 2026–2031 term (CNN Indonesia, 2026).

These developments demonstrate the emergence of an operational quality assurance system, but they do not yet establish its effectiveness across the pesantren sector. The 92 assessed units represent a limited number relative to the approximately 39,500 pesantren nationally. Because not all pesantren operate formal educational pathways subject to the same assessment arrangements, these figures are not directly comparable. Nevertheless, the available evidence suggests that the model remains at an early stage of coverage. A further distinction concerns institutional independence. Reports concerning the AHWA selection team list the Director of Pesantren within the Ministry among its members (CNN Indonesia, 2026). This arrangement does not establish political interference, but it illustrates how the Majelis Masyayikh exercises its independence within an institutional framework that includes state participation in member selection.

The significance of this emerging architecture becomes clearer when the statutory design is compared with reported implementation practices. Law No. 18/2019 envisages quality assurance as a mechanism for protecting pesantren autonomy and distinctiveness, with internal assurance undertaken through the Dewan Masyayikh and independent oversight through the Majelis Masyayikh (Arts. 26–29). It also provides for curriculum autonomy in kitab kuning education while assigning the Majelis Masyayikh responsibility for establishing the basic curriculum framework (Arts. 16 and 29). However, research on quality assurance, accreditation, and institutional governance identifies tensions between these protective objectives and the administrative demands of formal recognition. Studies of pesantren and Islamic higher education examine internal quality assurance and national accreditation as instruments for improving educational quality (Arif et al., 2025; Hani' et al., 2025; Lathifah et al., 2025; Tarigan & Zahara, 2024; Umam et al., 2024). The extent to which these mechanisms preserve the distinctive scholarly traditions of pesantren, however, remains contested.

Table 1. Design Intent of the Quality Assurance Model and Reported Implementation Tendencies

Dimension	Design intent under Law No. 18/2019	Reported implementation tendency
Function of quality assurance	A protective instrument safeguarding the autonomy and distinctiveness of pesantren education (Art. 26(2)(a)).	Quality assurance may operate partly as an administrative screening mechanism that differentiates institutions according to compliance with formal standards (Istiqomah & Arifi, 2026).
Institutional	Peer-based scholarly assurance	Independence remains embedded in a

responsibility	through the Dewan Masyayikh and an independent Majelis Masyayikh (Arts. 27–29).	framework permitting government funding under Art. 32 and involving a state official in the 2026–2031 selection process (Istiqomah & Arifi, 2026; CNN Indonesia, 2026).
Curriculum	Autonomy over the <i>kitab kuning</i> curriculum, supported by a basic curriculum framework established by the Majelis Masyayikh (Arts. 16 and 29).	Standardised general curricula may become dominant when integrated with pesantren education (Istiqomah & Arifi, 2026; Habibi, 2024).
Standards and indicators	Quality criteria addressing institutions, educators, and graduates.	Managerial and documentary indicators may receive priority, particularly in Ma'had Aly accreditation (Arifin & Sulaeman, 2026).
Coverage and equity	Equal recognition for qualifying pesantren (Arts. 3(c), 4, and 15).	Recognition benefits may concentrate in larger, better-resourced institutions, while smaller rural pesantren face greater barriers (Istiqomah & Arifi, 2026; Ni'am & Arafah, 2024).

Source: Author's synthesis of Law No. 18/2019 and the implementation tendencies discussed by Istiqomah and Arifi (2026) and the studies cited in the table.

The first major finding concerns the relationship between formal recognition and the distribution of educational and civil benefits. Article 19 establishes that graduates of *mu'adalah* education are eligible to continue to higher education and access employment (Istiqomah & Arifi, 2026). Recognition therefore has consequences beyond institutional status: it affects the portability of educational qualifications and the opportunities available to graduates. Accreditation has also been associated with stronger accountability in curriculum development, quality assurance, and human resource management in *mu'adalah* pesantren (Zuhdi et al., 2024). Similarly, pesantren policy has been found to influence santri competence both directly and through self-awareness (Rasid et al., 2025). Ramadhan and Arsyad (2025) further argue that integrating Islamic critical-thinking traditions with twenty-first-century skills can improve Islamic education. Taken together, these studies suggest that recognition becomes educationally meaningful when formal legitimacy is accompanied by substantive improvements in teaching, learning, and graduate competence.

Nevertheless, the distribution of recognition benefits is uneven. Istiqomah and Arifi (2026) report that the effects of recognition are concentrated in established institutions such as Gontor and Lirboyo, which have long operated the *mu'adalah* system, while smaller institutions have not experienced comparable gains. Zainul and Aminah (2025) similarly observe that full recognition depends on meeting standards concerning teaching staff, facilities, and curriculum. Differences in teacher certification and physical infrastructure between larger and smaller pesantren are documented by Ni'am and Arafah

(2024), while Thontawi and Huriati (2024) identify human resource readiness as another relevant consideration. Istiqomah and Arifi (2026) also highlight the absence of an explicit proportional mechanism for distributing support under Articles 46, 48, and 49.

These findings indicate that legal recognition does not automatically produce equitable educational opportunities. Its practical effects are mediated by the institutional capacity required to satisfy quality assurance and accreditation criteria. Where assessment places disproportionate emphasis on administrative documentation, infrastructure, and formal compliance, institutions with established resources are more likely to benefit. Conversely, where assessment recognises scholarly mastery, teaching traditions, and context-specific educational practices, institutions with distinctive intellectual strengths may be better positioned to demonstrate quality. Quality assurance thus becomes a critical point at which the equity of recognition is determined in practice.

The distributional problem is closely connected to the broader question of autonomy. Arifin and Sulaeman (2026) find that the accreditation framework for Ma'had Aly prioritises managerial and documentary indicators, including administrative governance, standardised curricula, and data compliance, potentially marginalising *turats* scholarship and embodied pedagogy. Their analysis also indicates that public trust in Ma'had Aly continues to rest substantially on scholarly lineage (*sanad*), the authority of the *kiai*, and intellectual reputation rather than accreditation status alone. Munifah et al. (2025) likewise report concerns that standardisation may alter the epistemological character of Ma'had Aly. At the policy level, Siregar et al. (2025) observe that formal recognition is accompanied by stronger administrative mechanisms, including accreditation, institutional verification, and curriculum standards. Hasibuan et al. (2026) identify bureaucratisation and uniform administrative requirements among the principal implementation challenges. Istiqomah and Arifi (2026) conceptualise this divergence as policy drift: the statutory text remains unchanged, but subordinate regulations and implementation practices may gradually depart from its protective intent.

Curriculum provides a second illustration of this tension. Istiqomah and Arifi (2026) identify a structural distinction between *pesantren* autonomy over the *kitab kuning* curriculum and ministerial authority over the general curriculum. In practice, the standardised general curriculum, with its requirements concerning instructional hours, competencies, and assessment, may exert greater influence than the *pesantren* curriculum, reversing the intended hierarchy under Article 16(1). Habibi (2024) consequently emphasises the need to harmonise curricula while preserving *pesantren* distinctiveness and meeting national standards. Zainul and Aminah (2025) document an integration effort in a *mu'allimin-mu'allimat pesantren* in relation to Articles 17–18. Zain et

al. (2026) further argue that curricular differences reflect underlying epistemological orientations rather than merely technical choices. A uniform competency framework may therefore overlook meaningful differences in how pesantren define, transmit, and validate knowledge.

Financial and political arrangements introduce additional constraints. Article 29 empowers the Majelis Masyayikh to establish the basic curriculum framework independently, while Article 32 permits government funding for the Majelis. Istiqomah and Arifi (2026) interpret this arrangement as a structural vulnerability because institutional responsibilities may be exercised within a financial relationship with the state. Alhifni et al. (2026) similarly argue that legal recognition does not automatically produce economic autonomy; outcomes depend on incentive structures, resource disparities, and negotiations among state regulation, market mechanisms, and religious authority. Political engagement can also create competing incentives. Zainuddin et al. (2026) show that the political engagement of kiai may facilitate access to public resources, but excessive dependence on political networks can threaten institutional autonomy and weaken the moral authority of religious leadership.

Finally, the concentration of internal assurance authority in a body led by the kiai creates both legitimacy and institutional risks. The authority of the kiai is a major source of public trust in pesantren (Arifin & Sulaeman, 2026; Hamdanah et al., 2025). However, quality assurance that depends excessively on individual charisma may become vulnerable to succession problems and inconsistent professional practices. Research suggests that reform can also emerge from within pesantren traditions. Faiz and Abdelmalek (2025) describe an integrative epistemology and endogenous reform at Ma'had Aly Situbondo, while Ubaidila and Sulaeman (2025) connect academic independence with a decolonial approach at Ma'had Aly Lirboyo. Anam et al. (2024) demonstrate that hadith studies in pesantren involve negotiations between textual interpretation and methodological reasoning. Abdurahman (2026), in examining the long-term formation of *Usul Fiqh* scholars at Ma'had Aly Situbondo, further highlights the importance of sustained scholarly formation. Collectively, these studies suggest that pesantren possess internal intellectual criteria for evaluating educational quality. The challenge is to develop assessment procedures capable of recognising these criteria while maintaining accountability and institutional continuity.

Balancing Autonomy and Accountability: The Recognition–Autonomy–Assurance (RAA) Framework

The second major finding is that the central challenge of the recognition model lies not in the statutory commitment to pesantren autonomy but in the design of the mechanisms through which recognition and quality assurance are

implemented. The preceding analysis identifies five interconnected tensions: technocratic assessment, curricular dominance, financial and political dependence, unequal institutional capacity, and the concentration of authority in individual religious leadership. These tensions do not necessarily invalidate the existing legal framework. Rather, they indicate the need for implementation safeguards that align recognition with the epistemological and institutional characteristics of pesantren.

To address these tensions, this article proposes the Recognition–Autonomy–Assurance (RAA) framework. The framework treats recognition, autonomy, and assurance as mutually dependent commitments. Recognition establishes the civil legitimacy of educational qualifications; autonomy protects the authority of pesantren to maintain their distinctive scholarly traditions; and assurance provides mechanisms for demonstrating educational quality and institutional accountability. The framework translates these commitments into five principles: peer legitimacy, dual-indicator assessment, a funding and appointment firewall, differentiated developmental support, and evidence-based continuous improvement.

Table 2. The Recognition–Autonomy–Assurance (RAA) Framework

RAA Principle	Problem Addressed	Operational Features	Main Evidence Base
Peer legitimacy	Epistemic dependence on external assessment criteria.	Assessors drawn from the pesantren scholarly tradition; protocols recognise <i>sanad</i> , mastery of texts, and teaching methods as evidence of quality.	Arifin & Sulaeman (2026); Niam et al. (2025).
Dual-indicator assessment	Technocratic drift.	Bounded weight for administrative compliance; separate scholarly indicators; documentation is not used as a proxy for scholarly quality.	Arifin & Sulaeman (2026); Hasibuan et al. (2026); Siregar et al. (2025).
Funding and appointment firewall	Financial and procedural dependence.	Formula-based multi-year funding; transparent selection with a majority of non-state members; assessment outcomes separated from funding allocation.	Istiqomah & Arifi (2026); Alhifni et al. (2026); Zainuddin et al. (2026).
Differentiated developmental support	Uneven distribution of recognition.	Capacity building before certification; needs-based support for small and rural pesantren.	Ni'am & Arafah (2024); Thontawi & Huriati (2024); Zainul & Aminah (2025).
Evidence-based continuous improvement	Weak feedback mechanisms and limited	Publication of aggregated assessment findings; monitoring policy outcomes;	Rasid et al. (2025); Arif et al. (2024); iNews (2025).

governance research.	field research on the Dewan Masyayikh.
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Source: Author's synthesis

The first principle, peer legitimacy, proposes that quality assurance should retain a substantive role for scholars who understand the epistemological traditions of pesantren. Assessment protocols should recognise sanad, mastery of classical texts, and established teaching methods alongside other relevant indicators of educational quality. This principle builds on the legitimacy of peer-based assessment and responds to concerns that external standards may inadequately represent the intellectual traditions of Ma'had Aly (Arifin & Sulaeman, 2026; Niam et al., 2025). Peer legitimacy does not imply exemption from accountability; rather, it requires that accountability criteria be interpreted by assessors with appropriate scholarly competence.

The second principle, dual-indicator assessment, distinguishes administrative accountability from scholarly quality. Administrative indicators concerning financial records, institutional data, safety, and documentation remain necessary. However, they should have a bounded weight and be assessed separately from indicators of scholarly mastery, curriculum integrity, and pedagogical practice. This separation would reduce the risk that documentation becomes a substitute for substantive educational quality. It responds to concerns about technocratic drift in Ma'had Aly accreditation and the expansion of standardised administrative requirements (Arifin & Sulaeman, 2026; Hasibuan et al., 2026; Siregar et al., 2025).

The third principle, funding and appointment firewall, addresses the institutional conditions required for credible independence. Funding for the Majelis Masyayikh should follow transparent, predictable, and multi-year arrangements, while member selection should employ clear procedures that protect professional judgment from undue political influence. A majority of non-state members is proposed as a potential safeguard, and assessment results should be separated from decisions concerning funding allocation. These are normative proposals rather than descriptions of current arrangements. They respond to the structural vulnerability associated with government funding under Article 32 (Istiqomah & Arifi, 2026), the incentive effects of resource distribution (Alhifni et al., 2026), and the risks associated with excessive reliance on political networks (Zainuddin et al., 2026).

The fourth principle, differentiated developmental support, recognises that institutions do not enter the recognition process with equivalent resources. Smaller and rural pesantren may require an initial capacity-building pathway involving teacher development, administrative assistance, infrastructure support, and targeted mentoring before full certification. Such a pathway would distinguish developmental assessment from final recognition without

abandoning minimum educational standards. It would also provide an operational basis for distributing support according to institutional needs, consistent with the concerns raised under Articles 46, 48, and 49. Existing evidence on disparities in facilities, human resources, and compliance capacity indicates that a uniform implementation pathway may reproduce inequalities rather than correct them (Ni'am & Arafah, 2024; Thontawi & Huriati, 2024; Zainul & Aminah, 2025).

The fifth principle, evidence-based continuous improvement, proposes that the Majelis Masyayikh strengthen the feedback relationship between assessment, institutional development, and policy revision. The Majelis has already articulated continuous quality improvement as an organising principle for its assessment activities (iNews, 2025). To translate this commitment into an accountable system, aggregated assessment findings should be published, institutional progress should be monitored over time, and the relationship between recognition policies and educational outcomes should be examined systematically. Research on the influence of pesantren policy on santri competence provides one potential basis for this evaluation (Rasid et al., 2025). The systematic review by Arif et al. (2024), which indicates that governance research remains limited, further supports the need for a stronger empirical evidence base. Research on the Dewan Masyayikh would also help clarify how internal quality assurance operates across different institutional contexts.

The RAA framework therefore offers an implementation-oriented response to the gap between the protective objectives of Law No. 18/2019 and the institutional pressures identified in the literature. Its five principles are proposed as safeguards that can be developed through subordinate regulations, appointment procedures, funding arrangements, assessment instruments, and monitoring practices. They do not inherently require amendment of the Law itself. This position is consistent with Istiqomah and Arifi (2026), who locate the principal challenge in the divergence between statutory objectives and implementation practices rather than in the wording of the legislation alone.

Taken together, the two findings establish that the significance of the recognition model depends on how institutional legitimacy, educational autonomy, and accountability are balanced in practice. The first finding demonstrates that formal recognition creates important civil benefits but that access to these benefits remains mediated by uneven institutional capacity and potentially technocratic assessment criteria. The second develops the RAA framework as a conceptual response to these tensions. Its central proposition is that sustainable quality assurance requires neither the withdrawal of state accountability nor the unrestricted preservation of institutional discretion. Instead, it requires assessment mechanisms that are accountable in administration, credible in scholarly terms, independent in institutional judgment, and equitable in their distribution of developmental support.

CONCLUSION

This study demonstrates that independent quality assurance under Law No. 18 of 2019 is not merely an administrative mechanism but a critical instrument for balancing state recognition, educational accountability, and pesantren autonomy. The principal lesson is that recognition becomes equitable and sustainable only when assessment protects scholarly traditions rather than privileging administrative compliance. The study's scholarly contribution is the Recognition–Autonomy–Assurance (RAA) framework, which integrates peer legitimacy, dual-indicator assessment, institutional independence, differentiated support, and evidence-based improvement into a conceptual model for pesantren governance. Practically, the findings encourage the Ministry of Religious Affairs to strengthen funding and appointment safeguards, the Majelis Masyayikh to refine assessment instruments, and pesantren leaders to develop internal quality assurance capacity. However, reliance on documentary evidence and secondary sources limits empirical validation and causal interpretation. Future research should employ comparative case studies, longitudinal graduate-outcome tracking, and regional analyses, particularly in underexamined provinces, to assess the framework's applicability, implementation, and effectiveness across diverse pesantren contexts.

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