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The Low Submission of Private Higher Education Institution Accreditation under Coordinator of Private Universities Region Xii

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Abstract

Government with Decision No. 12 of 2012 on higher education states that every university will be authorized to operate and issue a diploma after accreditation. Accreditation is the acknowledgment of the public or external parties to the college concerned and is also a form of assessment of the quality and feasibility of institutions conducted by independent organizations such as the National College Accreditation Committee (NHE-AC). Private higher education institutions under the coordination of Kopertis XII region, Maluku and North Maluku face challenges and difficulties to compete. In 2016, from 44 private universities under the coordination area of Kopertis XII only 7 of them have institutional accreditation status. This amount is considered very little compared to other Kopertis region's, therefore need further research to reveal the challenges faced by universities. The purpose of this research is to know the factors causing low accreditation submission among private universities under coordination of Kopertis region XII. The method used is qualitative descriptive approach. Data collection techniques are conducted through interviews and observation; Data were analyzed using Ishikawa or fishbone diagram. The results of this study indicate that of the 7 criteria given by BAN-PT, there are several factors causing the low delivery of accreditation by universities, namely: the vision and mission that has not been socialized and well understood by all parts of the academic community; Internal management within organizations that have not met standard operating procedures (SOPs); quality assurance agencies that have not been functioning properly; unqualified human resources, limited facilities and infrastructure; information systems are only partially available; curricula that are inconsistent with higher national education standards; interest of lecturers to conduct research and low dedication of education; and low number of publications.

Keywords: Accreditation, NHE-AC, Ishikawa diagram, Private colleges, Quality.

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1. Introduction

Higher Education Institutions quality in Indonesia generally have not been categorized in excellent level. Based on NHE-AC data in January 2017 only 49 HEIs in Indonesia categorized as accredited in status A institutions, mostly they were state higher education institution, and only 15 of them were private HEIs. A qualified HEI is a higher education instituition which capable of producing graduates who are able to actively developing their potentials and also able to produce science and/or technology applicable in community and country lives. Besides that, a qualified HEI must capable to develop and improving science andtechnology through researches and innovations. According Fattah (2008) the efforts of quality improvement and education expansion required at least three major factors namely: (1) adequacy of educational sources in terms of quality of education personnel, education fee and facilities; (2) quality of learning-teaching process which encourage students to study effectively; and (3) the quality of learning outcomes in terms of science, attitude, skills and values. Therefore the adequacy of sources, quality of teaching-learning process and quality of learning outcomes can be fulfill if the support costs required and professional education personnel were available. In order to obtain a qualified higher education mentioned, the government organized Quality Assurance System of Higher Education (QAS-HE). The quality assurance system of higher education devided into the following part:

- 1. Internal Quality Assurance System (IQAS) which implemented by HEI. IQSA is systematic quality assurance activity which conducted by higher education institution (HEI) consisting of standard setting, implementation, evaluation, control and standard improvement which held by sustainable concept of improvement.
- 2. External Quality Assurance System (EQAS) which conducted through accreditation process by NHE-AC for education institution accreditation and study program before an independent accreditation institution formed, which will accredited the study program based on science groups and branches.

The outcomes of IQAS will be an input of accreditation process through EQAS by NHE-AC. IQAS conducted to improve a sustainable quality; while outcomes of accrediation process will become input for HEI in developing quality improvement strategy in the future. In accordance with Regulation of the Minister of Research, Technology and Higher Education No. 32 year 2016 article 1 stipulates that the accreditation of universities is an assessment activity to determine the feasibility of Higher Education. (Regulation of the Minister No.32). According to Jamal (2011) Accreditation is a process of appraisal with a fact-based fact-based indicator by an assessor and observation based on reality, without any manipulation.

In reality, there were still many private higher education institution under coordination area of Kopertis XII possessed program study only accredited in C level; only reaches 16% of all HEIs accross Kopertis XII and only one of them accredited as B institution. Coordinator of private HEIs (Kopertis) region XII supervise 44 private HEIs with 7 HEI accredited institutions (1 accredited in B level and 6 accredited in C level); consisted of 165 study program (30 accredited in B level and 135 accredited in C level).

Table-1. Accreditation of private colleges in Kopertis regional XII

No.	The Name of Private HEIs	Accreditation		
		A	В	C
1	Academy of Midwifery Gatra Buana Gurabati, Tidore	-	-	V
2	School of Economical Science of Umel Tual	-	-	
3	STKIP Hatta Sjahrir Banda	-	-	
4	STKIP Kie Raha Ternate	-	-	
5	School of Agricultural Science of Labuha	-	-	
6	Indonesian Christian University of Maluku	-	V	-
7	Muhammadiyah University of North Maluku	-	-	√
	Total	_	1	6

Source: National Accreditation Committee of Higher Education, January 5 2017 (data processed)

The quality improvement of HEI is a necessity which can be view as a reflection of three dharma of education implementation in each HEI. If the interest of HEI of obtaining accreditation from NHE-AC is still low, Kopertis must investigate to ensure the chalenges and difficulties experience by HEIs under their supervision. Based on data in Table 1 above, Kopertis XII as government hand extension in area Maluku and North Maluku must acknowledge what are the causal factors which resulted low submission of accreditation status of HEI under their area of coordination.

2. Methodology of Research

This study took place in 6 private HEIs under Coordination Area of Kopertis XII. This study focused on searching the causal factors that has been the root of the problem faced by private HEIs A, B, C, D, E, and F which causing the low accreditation submission among higher education institution. The framework of this study desained as qualitative descriptive research. According to Winartha (2006) the qualitative descriptive analysis method are analysing, describing and summarize various conditions, situations of various data collected in terms result of interviews or obsevations regarding any examined issues found in the field of research. Sampling technique used in this study was random sampling. According to Sugiyono (2003) random sampling technique is sample collecting technique where each individual in the population both independently and simultaneously were given an equal chance to be choosen as the member of the sample. The sample withdrawal method conducted in this study was randomization or similar to lottery. Qualitative data collection method done by intensive interviews, observation and collecting private HEIs documents. The type of data were categorized into primary data and secondary data. This study was using primary data obtained from source of data with informants consisted of 24 people as interviewees, while secondary data were consisted of strategic documents, HEI self evaluation, result of monitoring and evaluation by Kopertis region XII and data from National Accreditation Committee for Higher Education. Data analysis technique used was the Ishikawa Diagram or Fishbone Diagram. Ishikawa diagram used to identified the cause of an issue (Tague, 2005).

3. Result and Discussion

In order to improve quality, Goetsch and Davis (2000) opine the necessity of identifying the root cause of the problem occure. HEI is an open organization which perform its activity process, involving and influence by many elements, both elements inside and outside (Miller, 2007). With an eye of obtaining a clarity regarding the problems and its existing causal elements, it is necessary to reveal through reviewing related elements of HEIs' quality. In improving quality and competitiveness to HEIs' graduates, accreditation was really necessary as a standard measurement regarding education quality of a higher education institution, so that it could ensure the teaching-learning process of the HEI concerned; also as a reference in providing information regarding the HEIs' readiness in conducting teaching-learning process in accordance to standardization provided by the government. This accreditation study conducted to 6 private HEIs accross Kopertis region XII were using 7 criteria of NAC-HE as shown in Table 2:

Tabel-2. 7 Criteria of NAC-HE in 6 private colleges

No.	7 Criteria of NAC-HE	Questionnaire of the Study	Pri	Private HEIs		Private HEIs				
			A	В	C	D	E	F		
1	Vision, Mission, Objective, Goal and	Possess HEI vision and mission			\checkmark					
	Strategy	VMOGS sosialized to all stakeholder		\checkmark	\checkmark	-	_	_		
		VMOGS understood by all stakeholder		-	1	-	_	_		
		VMOGS well functioned		\checkmark	\checkmark		\checkmark			
2	Good Governance, Leadership,	Good Governance Instrument	7			7		$\sqrt{}$		
	Management System and Quality	Management System in accordance to SOP	7	_	1	ı	_	_		
	Assurance Institution	Coordination among Leader								
		Instruments of Quality Assurance Institution	\checkmark	$\sqrt{}$	$\sqrt{}$	-	_			
		Quality Assurance Institution well								
		functioned	_	_	_	_	_	_		

Table-2. 7 Criteria of NAC-HE in 6 private colleges (continued)									
No.	7 Criteria of NAC-HE	Questionnaire of the Study		Private HEIs					
			A	В	С	D	Е	F	
3	Students and Graduates	idents and Graduates Private HEI Students' Affair Activities						_	
		Participate in Kopertis and HEI activities	V	1		_	1	_	
		Softskill Development Unit well functioned	_	_	_	_	_	_	
		Graduates Development Institution	_	_	_	_	_	_	
4	Human Resource	Lecturer DPK							
		There were still S1 degree lecturers							
		Have Lecturers with the rank of Professor	_	_	1	-	_	_	
		Teaching Personnel who have no Academic							
		Incumbency	_	_	_	_		_	
5	Curriculum, Learning and Academic	Institution that assess and develop the quality of							
	Environment	study	_	_	_	_	_	_	
		Curriculum in accordance to Minister Regulation							
		No. 44 of 2015	_	_	_	_	_	_	
		Academic environment development	$\sqrt{}$	$\sqrt{}$	√	√	√	$\sqrt{}$	
6	Finance, Facilities and Infrastructure,	HEI operational costs financed by students'	,	,	,	,	,	,	
	Information System	education fee	√		√	V	√	√	
		Other Financial Management Business besides							
		students' education fee			_	_	_		
		Facilities and Infrastructure suffice	√		_	_	_		
		Facilities and Infrastructure need to be updated			,	,	,	,	
		+ added	_	_	√	√	√	1	
		IT base Of System Information	√	√		_			
		System Information manually			√,	√,	√		
7	Research, Dedication and	Possess Research and Dedication Guidelines	√		$\sqrt{}$	$\sqrt{}$		1	
	Cooperation	Lecturer actively involved in research and	,	,	,	,			
		dedication	$\sqrt{}$		√	V	_	_	
		Obtain bequest of research and dedication from							
		Ministry of Research, Technology and Higher	,	,	,	,	,	,	
		Education	√		$\sqrt{}$	$\sqrt{}$		1	
		HEI encourage lecturer to conduct research and			,				
	dedication			√,	1	_	_	_	
	,	Collaboration with other institution	7		$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	1	

Remaks: $\sqrt{\ }$ = available/done, - = unavailable Data Source: Data Processing Result

3.1. Vision, Mission, Goal, Objective and Achievement Strategy

This standard is the quality reference of implementation and strategy of study program to achieve the future. According to David (2002) explained briefly a vision is about depiction of the system which is aimed, due to science alteration and unpredictable situation during the long period, vision is an initial process in developing an organization mission; in other words, vision is an expectation that an organization or company wish to achieve in the future. According Kuncoro (2006) vision formulation is very important as the direction of strategy and guidance to implement the strategy that is formulated. A good vision (vision of succes) can be defined as a description of what the organization wants to achieve once the organization has implemented its strategy and achieved its full potential. Vision is a picture of a future condition that is not yet visible now, but a conception that can be read by everyone (Salusu, 2006).

From the result of the study the problem occured to the first criteria of the 6 private private colleges are as follow:

- a. All private HEIs possess vision, mission, Goal, Objective and Strategic in their Strategic plan, however University D, E and F did not socialized them to all parts of academic community. Thus many of the member of academic community aware of the HEIs' vision, mission, Goal and Objective. However for University A, B and C already socialize their VMGO to lecturers, students and employees, both verbally and by announcing through posters of VMGO in every classroom and entyre parts of HEIs' building.
- b. Not all parts of academic community understand the Vision and Mission of the private HEIs because triumph degree in each development stages determined by participation and ability of the institututions' elements in performance achievement. Therefore, during the disposition of vision, mission, goal, objective and strategy, required explaination of the vision and mission achievement indicators. The formulation of primary Goals and Strategy represent main indicator of HEI's excellence and uniqueness. In this factor, University A has perform properly its vision, mission, goal, objective and strategy where they have achieve performance in accordance to their short term strategic plan.

3.2. Good Governance, Leadership and Management System and Quality Assurance

Good governance must be synchronize with a proper institutional management implementation through integration of stakeholders' prominence. The good governance criteria already possessed by all the 6 private HEIs with their own instrument or documents of governance. However, not all of their management system relevant to Standard Operational Procedures (SOP). SOP basically is a guidelines contained standardized operational procedures within an organization which is used to ensure every decision, action, utilization of facilities, and all the process conducted by people within the organization run efficiently and effectively, consistent, standardized and systematically. The most important factor in the quality assurance movement is the imperative of universities to provide quality assurance, in addition to the demands of accountability and graduate qualifications (Olssen, 2004).

- a. For three private HEIs of A, B and C quality assurance institution have well functioned and own quality assurance documents although the application have not been maximized. While for Private University of D, E and F quality assurance institution have not functioned; University D and E both did not hold any quality assurance documents at all.
- b. Governance elements were owned by all the six private HEIs referring to good governance instruments, University D, E and F have not owned a relevant private HEI management system nor Standard Operational Procedures required by the Ministry of Research, Technology and Higher Education.
- c. Non of the six private HEIs possessed institution planning and development unit.

3.2. Students and Graduates

Students under supervision of coordinator of private higher education region XII came from several adjacent area where the private HEIs are located. As for the selection system applied in those private HEIs capable of encompass students from various high school available. However according to Iranita (2010) there were eight factors to be considered in choosing private HEI, as follow: academic reputation, the size of Higher Education Institution, geographic location, selectivity of HEIs, Scholarship availability, academic programs availability, students' population and social environment.

A proper reputation and education quality will increase the number of students signed in as well as producing a qualified graduates. On the students' selection process of private university A and B were more eminent due to their good image of possessing accreditation status, which resulted much more students interested in entering these private HEIs.

Student affair activities usually consist of extracurricular activities to complete intra curricular activities, which were conducted both inside and outside of campus without being given any extracredit, comprised the following item: logical and scientific development; talent, interest and hobby; students' welfare; and social service. Many private universities took part in these activities but many more did not put any participation in them due to fund deficiency. The cooperative relationship between private HEIs with their graduates mostly were still very poor. HEIs' sense of responsibility to their graduates nearly disappear, because there was a presumption that the graduates were the one whose morally responsible to develop private HEIs. Private HEIs usually did not put any account for graduates empowerment program nor opening access to job market for graduates. If the private HEIs capable of encouraging their graduates empowerment accordingly would give positive impact for private HEIs development itself in the future, especially in embracing new students. The problems occured to these 6 private HEIs as follow:

- a. Students' participation in students affair activities. Private HEIs of A, B and C opted in their students in every activities both in the whole coordinator 12 area and between HEIs. While private HEIs of D, E and F rarely take part in students affair activities due to deficiency fund problem they were facing.
- b. In terms of softskill development activities, private HEIs A, B and C were very viable performing activities which was channeled by joining students' affair unit activities such as: karate, choir, nature lovers students communion as well implementing student day by conducting scientific discussion regarding trending topics in the community.
- c. All these 6 private HEIs A, B, C, D, E and F did not establish any gradutes reinforcement and career institution.

3.3. Human Resource

Human Resource is the main factor in the world of education. In development process, education occupy a quiet strategic position. This is because education capable topropel and develop superior human resources. Considering that human resource is the most important asset in an institution and/or organization, as well as to educational institution human resource would determine its development in the future. Higher Education Institution must possess an adequate quality management system for coaching purposes also lecturers' quality improvement and other education personnel with an adequate amount, qualification, and performance quality relevant to HEIs

implementation requirements, by managing an excellent selection system, recruitment, placement, development, retention and retirement of lecturers and other educational personnel which conformable with the requirements of academic programs quality assurance (Wijayanto, 2009).

Table-3. Data of Education Grade and Academic Occupation

	Lecturer edu	ıcation		Academic							
Private	Grade			Occupation							
HEIs	Undergradu	Magister	Doctoral	Teaching	Expert	Lector	Head of	Professor			
	ate	_		Personnel	Assistant		Lector				
A	1	106	20	-	59	49	19	-			
В	6	212	2	-	131	76	13	-			
C	10	100	2	-	79	30	2	1			
D	35	76	8		56	52	11	-			
E	10	13	-	17	4	2	-	-			
F	4	11	2		7	9	2	-			

Source: Data Processing Result 2017

Table 3 shows that in the 6 private HEIs there were still lecturers with educational background of only S1 Degree (Undergraduate program). In terms of lecturers who hold magister degree (S2), private HEIs A, B and C possess more lecturers with S2 Degree holder compared to University D, E and F. On the other hand, private HEI wich has the most Doctoral (S3) holder lecturer was University A compared to any other private HEIs in Kopertis region XII.

Table 3 also shows academic occupation of the 6 private HEIs. Academic occupations were the most occupied job in all 6 private HEIs; especially in University B with the most amount of 131 people and the smallest of only 4 people in University E. For Lector position, University B filled this academic occupation with 76 people and the smallest of only 4 people in University E. In position of head of lector, the most occupied was in University A of 19 people compared to other private HEIs. There was only 1 Professor in all 6 private HEIs which was in University C. In the mean time, in University E there were still teaching personnel who have no academic occupation. The problems occurred in this standard:

- a. Still found lecturer who hold qualification S1 Degree
- b. Lecturer with S3 Degree still minimal
- c. Lecturer who hold academic occupation of Head of Lector and Professor still minimal
- d. Still found lecturer who hold no academic occupation.

3.4. Curriculum, Study and Academic Environment

In terms of activities in study and development of system and learning quality development; which could produce learning achievement relevant to curriculum objectives; also creating graduates who would be able to think critically, eager to explore, eager to experiment and having integrity as well as utilization of the result; private HEIs sought to have a special unit which studying and developing learning quality. However, such institution did not found in any of these 6 private HEIs. All the issues were studied by quality assurance institution. The publication of president regulation No. 8 year 2012 and Decree No. 12 year 2012 article 29 verse (1), (2) and (3)had influence the curriculum and its management in each program. Curriculum that was originally reffered to the achievement of the competence turns to learning outcomes as the refference. Regulation of Ministry of Research, Technology and Higher Education No. 44 year 2015 regarding higher education national standard article 4 and 5 stated the linkages between learning outcomes with the curriculum which reffered to Indonesia National Qualification Framework (INQF). Concisely, INQF composed of nine level of Indonesian human resources qualification and is a statement of Indonesian human resources quality where the laddering qualification based on the capability degree as stated in the learning outcomes formulation. Formulated in grade 6 INQF, Magister degree equal to grade 8 and henceforward. The problems occurred in this standard as follow:

- a. None of the Private HEIs in Kopertis region XII reffered to INQF and Regulation of Ministry of Research, Technology and Higher Education No. 44 year 2015. Some of the private HEIs in Kopertis region XII had just finish socializing curriculum reffered to INQF.
- b. All the six private HEIs did not take possession of study and development learning system institution.

3.5. Financing, Facilities, Infrastructure and Information System

One of the aspect that has been the center of attention for education administrator was the education facilities. Education facilities generally includes all the facility which directly used and supporting education process, standard facility and infrastructure was the criteria regarding class room, sports facility, place of worship, library, laboratory, workshop, playground, creation and recreation place and other study facility. These facilities are necessary to support learning process, including utilization of information technology and communication. For private HEIs under Kopertis regiona XII had taken possession of representative buildings, only 1% of them were using rental building. Private HEIs in North Maluku region had completely owned facilities and infrastructure which consist of land, campus building, classroom, leader and lecturers' room, seminar room, laboratory, library, computer facilities, information technology facility, learning support equipment, students' affair supporting equipment, laboratory equipment, cafetaria, worship place and parking space. Some of the buildings of private HEIs around North Maluku area still needed to be renovated due to its economic age of almost obsolete. While a few private HEIs in Maluku area still have not possessed their own building ever since their opearational lisence published, they still using rental building.

Financing are the efforts of providing, organizing and enhancement of an adequate budget quality to support the implementation of qualified academic programs in higher education institution as nonprofit organization. Accounting components and financing in an institution are production components that determines the implementation of the institution activities along with other components. In other words, every activities

conducted required costs, whether consciously or not. These accounting and financing components required an excellent management, so that the fund could be utilize optimally to support the achievement of education objective. Almost every private HEIs under Kopertis regiona XII gain their source of fund from students' educational fee. It is necessary to have another source of fund as additional fund to improve the education quality of the private HEIs.

Management of HEIs facilities and infrastructure comprise planning, procurement, utilization, maintenance, updating, inventory recording and asset deletion which has tobe done properly, so that could effectively supporting all the academic implementation activities in private HEIs. The facilities and infrastructure owned by the private HEIs to support three dharma of higher education had been available, however additional class room and facility and infrastructures' improvement still necessary.

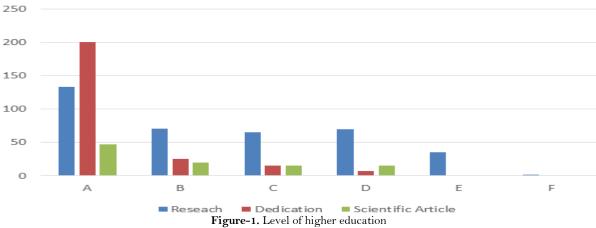
Management information of education are the tools and means of information service including communication, performance and teamwork effectivity in the planning, organizing and monitoring which intercourse on a connected and collaborative nerwork to achieve education institution goal. The system consist of three network namely: internet, intranet and extranet. As for the utilization of information system in academic and adminiastrative process only University A had already use the system. Five other private HEIs were still using manual information system eventhough they were internet based. The constrained use of IT-based information systems occure due to unavailability of human resource to organize. This standard facing problems as follow:

- a. Private HEIs of D, E and F, facilities and infrastructure owned were not complete and/or require further renovations, while University D required additional classroom.
- b. Private HEI of A was using an on-line information system; University B and C information system used were both on-line and manually. While in University D, E and F did functioned well, the information system were also facing internet connection difficulties.
- c. The budget/fund collected by all the 6 of private HEIs came from student education fee.

3.6. Research, Service/Dedication to the Community and Co-operation

Higher Education Institution is one of the sub system of national education. Their existance in the nation life are playing an important role through the implementation of Three Dharma of Higher Education. Under the Decree No. 12 of 2012 article 1 verse 9 stated that The Three Dharma of Higher Education is an obligation of Higher Education Institution. (Decree of government of republic Indonesia No.12). However, unrealize the implementation of management to The Three Dharma tends to be partially. Whereas all the three dharma must be carried out simultaneously, connected and mutually supportive.

The development of scientific writing is an inseparable part from lecturer's competence as it was written in Three Dharma of Higher Education, namely the duty of lecturers include three component: education and teaching; research and scientific work; and dedication to the community. From these three components, research and scientific work is the one component that required a special attention. This due to many lecturers were facing difficulties in conducting the research as well writing a scientific work. All this time many lecturers spent their working career only for teaching. While their duty to conduct research and wrote scientific working and dedication to the community oftentimes abandoned. The interest and ability of lecturers in conducting research and scientific writing were very low caused by a lot of factors. One of the factor is the limitation of scientific journal which is ready to publish the results of lecturers' research and scientific writing. Therefore, the existance of scientific journals require continuous revitalization so it would capable to become a point for lecturers to increase their productivity of doing research and writing scientific work. The limitation of research fund provided by HEI also one of the inhibitor factor in the research conducted by private HEIs of Kopertis region XII. As it pictured in figure 5, research productivity, dedication and scientific articles mostly conducted by University A, B, C and D compared to University who were very low at research and scientific articles.



Data Processing Result, 2017

Research productivity and development by lecturers of private HEIs in Kopertis region XII were very low compared to the same work by other lecturers from another area of Kopertis. The data shows that the research grants received by the leturers in private HEIs of Kopertis region XII had been decrease in 2017 compared to 2016. The problems occure in this criteria namely:

- a. Lecturers' interest to conduct scientific research and dedication were still very low
- b. Trainings regarding methodology of research have not include all of the lecturers.

Based on the results of this study through 6 private HEIs under coordination Kopertis region XII presenting the cause and/or problems occured with the result the low submission of institutions' accreditation. The fundamental thing is that private universities are not yet in accordance with Permenristekdikti No 44 in 2015. Socialization has been done by Kopertis XII, but not all study program leaders understand that the standard that

must be used now is new standard. However there is still a chance at the end of this month for the PTS to revise the improvements to be implemented in 2018.

4. Conclusion

The results of the study generally can be concluded that the problems arise and/or the cause of low submission of institutional accreditation happens in private HEIs of A, B, C, D, E and F based on criteria of NAC-HE apropos institutions' vision and mission have not been socialized properly and/or understood by all parts of academic community; internal organizations' management have not aim to Good University Governance; not functioning of quality assurance unit within the institution; un-adequate of human resources both their qualifications and quantity; limited facility and infrastructure; information system within the institutions worked partially; the curriculum arranged by the HEIs have not reffered to Higher Education National Standard; lecturers' interest in conducting research and scientific publications were un-adequate. Therefore all the 6 private HEIs required a sustainable quality improvement through the implementation of Internal Quality Assurance System (IQAS).

5. Suggestion

Private universities should immediately establish the Standards of Higher Education formulated by each private university where the standards must exceed the National Standards of Higher Education. After that PTS must implement the implementation of the standard, and evaluate regularly. If there is a standard deviation, PTS should immediately control it, and if the standard has been reached then the PTS is considering to improve the standards used

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