

## **Policy Evaluation Implementation of Risk-Based Business Licensing in Kuningan District**

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### **ABSTRACT**

The policy performance of implementing Risk-Based Business Licensing through the Online Single Submission-Risk Based Approach (OSS-RBA) system in Kuningan Regency is still experiencing obstacles because Kuningan Regency does not yet have a Detailed Spatial Plan (RDTR) which has an impact on hampering the process of basic requirements in the form of Conformity of Space Utilization Activities (KKPR), Environmental Approval and Building Construction Approval (PBG). Therefore, it is necessary to evaluate the business licensing policy so that the aim of the policy, namely improving the investment ecosystem through issuing business permits more effectively and simply, can be achieved. This research uses qualitative methods with data collection and analysis techniques through observation, interviews with service officers and the community as well as documentation studies. Based on the results of research using William N Dunn's evaluation theory with 6 main criteria, it was concluded that the implementation of risk-based business licensing policies in Kuningan Regency has not met effectiveness, efficiency, adequacy, alignment and accuracy in encouraging ease of business licensing even though the responsiveness is quite good with the increasing number of permits. Micro and Small Enterprises (IUMK) in Kuningan Regency. To increase the effectiveness of implementing this policy, the Kuningan Regency government issued a regional policy so that the business licensing public service process in Kuningan Regency continues to run well.

**Keywords:** policy, evaluation, risk-based business licensing

## INTRODUCTION

Public services are one of the main tasks of the government to meet the basic needs of society (Dewi & Suparno, 2022) . Quality public services are the right of every citizen and resident to goods, services and/or administrative services provided by public service providers, namely the government (Riani, 2021) . However, in reality there are still many problems faced in the implementation of public services in Indonesia. Therefore, efforts are needed to improve the quality of public services in Indonesia. One of the efforts made is to formulate and implement public policies regarding public services.

Edward and Sharkey (in Kusumanegara, 2010: 4) define public policy as what the government says and do, including: goals, intentions of government programs, implementation of intentions and regulations. "Policies are usually stated in various forms of regulations" (Putri, 2020) . Arum Sutrisni Putri in her article entitled Public Policy: Definition, Goals and Characteristics said that "the goal of public policy is to achieve community welfare through regulations made by the government (Putri, 2020) . To realize community welfare, it can be realized through improving the quality of public services in all sectors of community life, including the business licensing services sector.

Regulations regarding business licensing implementation policies in Indonesia are continuously changing (Bhinekawati, 2016). The last regulation regarding business licensing issued by the government and currently being implemented in Indonesia is Government Regulation (PP) Number 5 of 2021 concerning the Implementation of Risk-Based Business Licensing, which was issued to overcome licensing problems which were considered complicated, long and expensive (Urbaningrum & Nendi, 2023). Previously, the implementation of business licensing referred to Government Regulation Number 24 of 2018 concerning Electronically Integrated Business Licensing Services.

Government Regulation (PP) Number 5 of 2021 concerning the implementation of risk-based business licensing is a derivative of Law Number 11 of 2020 concerning Job Creation which was replaced by Law Number 6 of 2023 concerning Determination of Government Regulations in Lieu of Law Number 2 In 2022 concerning Job Creation Becomes Law (Wibowo, 2021) . 'This PP regulates business licensing based on the risk level of business activities. In this PP article it is stated that the implementation of risk-based business licensing includes: 1) regulation of Risk-Based Business Licensing; 2) norms, standards, procedures and criteria for Risk-Based Business Licensing; 3) Risk-Based Business Licensing through Online Single Submission/OSS System services; 4) procedures for Supervising Risk-Based Business Licensing; 5) evaluation and reform of Risk-Based Business Licensing policies; 6) funding for Risk-Based Business Licensing; 7) solving problems and obstacles to Risk-Based Business Licensing; and 8) sanctions.

This PP was first implemented on August 9 2021 at the same time as the launch of the Online Single Submission-Risk Based Approach (OSS-RBA) system, which is a system for applying for risk-based business permits. Before this PP was implemented, business licensing was carried out on a permit basis where the system or application used to apply for business permits used a local system or application developed by each region. In PP Number 5 of 2021 article 1 it is stated that:

1. Online Single Submission, which is then abbreviated as OSS, is an integrated electronic system managed and implemented by the OSS Institute for the implementation of risk-based business licensing.
2. Business licensing is the legality given to business actors to start and run their business and/or activities.

3. Risk is the potential for injury or loss from a hazard or a combination of the possibility and consequences of a hazard.
4. Risk-based business licensing is business licensing based on the level of risk of business activities.

The aim of holding risk-based business licensing is to improve the investment ecosystem and business activities, through:

1. The implementation of permit issuance is more effective and simpler, and
2. Supervision of business activities that is transparent, structured and accountable in accordance with statutory regulations.

To start and carry out business activities, business actors are required to fulfill:

1. Basic requirements for business licensing, and/or  
The basic requirements for business licensing include suitability for space utilization activities (KKPR), environmental approval, building approval (PBG), and functional feasibility certificate (SLF). (Article 4 PP 5 of 2021)
2. Risk-based business licensing.

Risk-based business licensing activities are classified into 3 levels of risk (article 10 PP Number 5 of 2021), namely:

1. Business activities with a low level of risk;  
Business licensing for low risks is sufficient with the NIB which is the business identity as well as the legality for carrying out business activities (Article 12 paragraph 1 PP Number 5 of 2021)
2. Business activities with a medium risk level;
  - a. Medium Low  
Business licensing for medium to low risk is NIB and Standard Certificate (article 13 paragraphs 1). Standard Certificates for low medium risk are issued automatically through the OSS system (article 13 paragraph 2 PP Number 5 of 2021)
  - b. Intermediate High  
Business licensing for medium to high risk is NIB and Standard Certificate (article 14 paragraphs 1). Standard Certificates for medium to high risks are issued after verification of compliance with standards for implementing business activities through the OSS system (article 14 paragraph 2 PP Number 5 of 2021)
3. Business activities with a high level of risk:  
Business licensing for high risks is NIB and Permit (article 15 paragraph 1 PP Number 5 of 2021).

Since PP Number 5 of 2021 was officially implemented in Indonesia, the implementation of business licensing in Kuningan Regency automatically follows the policy of the central government, namely risk-based. In implementing the risk-based business licensing policy in Kuningan Regency, obstacles were found. The most common obstacle found is when business actors fulfill the basic requirements in the form of Suitability of Space Utilization Activities (KKPR) because Kuningan Regency does not yet have a Detailed Spatial Planning Plan (RDTR) that is integrated with the OSS system. This of course also affects the fulfillment of other basic requirements in the form of Environmental Approval and Building Approval (PBG) because KKPR is a requirement for managing these two basic requirements.

The absence of RDTR in Kuningan Regency has caused delays in the licensing process in the OSS system, especially for business activities with medium to high and high risk levels. The following is an example of permits that are still pending.

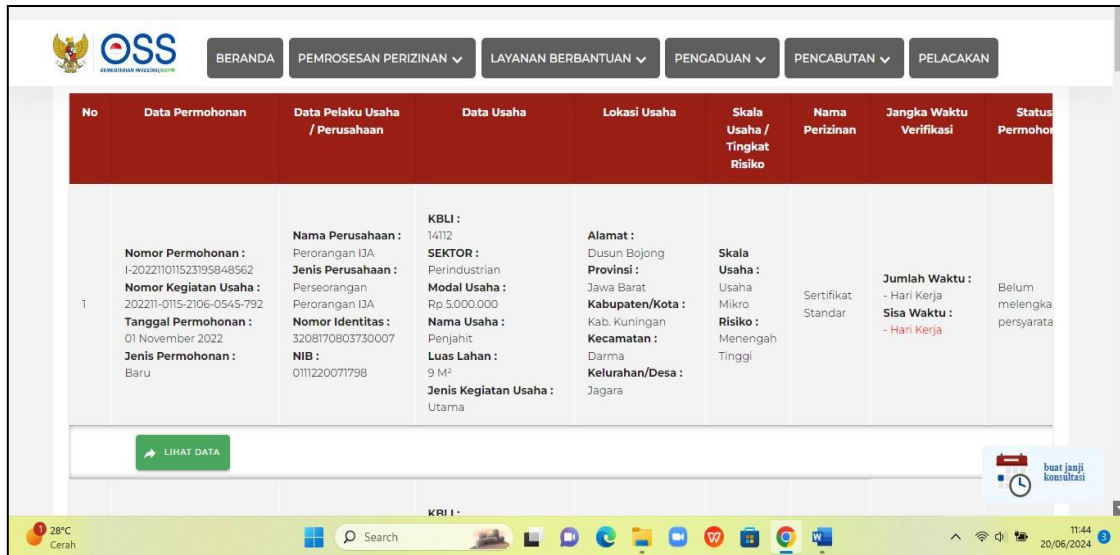


Figure 1: 2022 applications at OSS that still meet the requirements (Source: <https://oss.go.id>)

The length of the process of fulfilling these basic requirements also influences the achievement of the PBG levy target in Kuningan Regency. Since the change from IMB to PBG in 2022, the PBG levy target has never been achieved.

Table 1 Percentage of IMB and PBG Retribution Target Achievement in Kuningan Regency

DESCRIPTION	BEFORE PBG (IMB) %		AFTER PBG %	
	2020	2021/transition period	2022	2023
Achievement of Building Levy Target	176.51	82.92	91.98	29.72

Source: Data from the Kuningan Regency Investment and One-Stop Integrated Services Service

From the table above, it can be seen that while the IMB still achieved the levy target, it exceeded the target, but after PBG was implemented, the levy target was never achieved. Failure to achieve this retribution target certainly has little influence on governance in Kuningan Regency. Therefore, it is necessary to evaluate the business licensing policy so that the objectives of implementing this policy can be achieved.

Previous research analyzing business licensing services and OSS was carried out by (Robby & Tarwini, 2019), who revealed his research through the implementation concept of Edward III using a descriptive qualitative approach. This research uses Edward III's theory where variables consist of several main dimensions, namely communication, resources, disposition and bureaucratic structure. The results of research conducted by Robby and Tarwini (2019) concluded that business licensing through OSS in Bekasi Regency is good, however its implementation has not run optimally and obstacles are still found related to supporting facilities or infrastructure (Robby & Tarwini, 2019).

Furthermore, research was conducted by (Erni & Jaya, 2022) entitled The Effectiveness of Risk-Based Business Licensing in the Context of Ease of Doing Business. This research concludes that risk-based business licensing through the OSS-RBA System still has obstacles in that the system and its implementation are still in the process of being perfected so that the effectiveness of the new business licensing regulations and system is still not optimal.

Further research was conducted by (Purnami, 2022) with the research title Online Risk-Based Business Licensing Services at the Investment and One-Stop Integrated Services Service of West Nusa Tenggara Province. This research reveals that the online risk-based business licensing service at the West Nusa Tenggara Province One-Stop Investment and Integrated Services Service is quite good in terms of the dimensions of tangibles, responsiveness, assurance and empathy. However, the reliability dimension is still not good and needs to be improved. In this research, it is recommended that the DPMPSTP of West Nusa Tenggara Province can coordinate with those who have authority at the center regarding OSS-RBA and are advised to improve the quality of infrastructure as well.

The difference between previous research and this article is that this research evaluates the implementation of the risk-based business licensing policy in Kuningan Regency to find out the extent to which the implementation of the risk-based business licensing policy has been successful in increasing investment in Kuningan Regency?

## **Policy**

In government activities, policy is an important thing. This is because policies can have a good impact on the lives of citizens. In general, the definition of policy is a written rule which is a formal decision by an organization or agency which is binding and regulates the behavior of a person or group with the aim of creating compliance in society and policy must always be present in state life. Meanwhile, according to Wahab, the definition of policy is "an action that leads to a goal proposed by a person, group or government in a certain environment in connection with certain obstacles while looking for opportunities to achieve the goal or realize the desired target" (Wahab, 2004: 3 )

In the process, policies go through several stages before becoming a decision. Ripley (in Kusumanegara (2010: 10-14) provides a more in-depth and detailed formulation of policy stages which are also grouped into five stages as follows:

1. Stages of Agenda Preparation  
It is a stage of decision on problems that are of concern to the government to be made into policies. That the government is faced with various problems around it. For this reason, at a certain time the government must decide what issue is the basis for making a public policy.
2. Formulation and Legitimacy  
Issues that enter the policy agenda are then discussed by policy makers. The problem is taken from various existing alternatives. At that stage, each actor will "play" to propose the right solution to the problem.
3. Program Implementation  
After the formulation and legitimacy have been fulfilled, the program must be implemented. In order for the program to run, laws are needed. Because there are parties who have competing interests in implementing the program.
4. Implementation Evaluation

This stage carries out an assessment of the implementation of the policy, both in terms of process and impact. These assessments occur constantly by government officials, interest groups, and people's representatives, researchers in government institutions and outside those institutions.

5. Decision

Where this stage determines decisions about the future of the programs and policies that are formed. Is it necessary to continue or not? If it is deemed no longer relevant, the program will be deleted.

## **Evaluation**

Policy makers must be prepared for risks or problems that may arise when a policy is implemented. Usually these risks and problems become material for evaluation by policy makers, where from this evaluation the success or failure of a policy will be known, so that normatively recommendations will be obtained as to whether a policy can be continued, or whether it needs to be revised before continuing or whether it must even be stopped and a new policy made completely different from the previous policy.

Riant Nugroho, in his premise, stated that every policy must be evaluated before being replaced so that there is a clause "can be replaced after evaluation" in every public policy. This needs to be used as a reference because, first, to avoid the bad habits of public administration in Indonesia which often applies the principle of changing officials, regulations must be changed (Supriatna, 2019) . Second, so that every policy is not changed just because of the wishes or tastes of the official in authority at that time (Nugroho, 2008:471). In this regard, the purpose of evaluation according to Nugroho (2008:472) is not to blame the party who issued the policy, but to find out the gap between expectations and achievements of a policy and how to close this gap.

The evaluation function of public policy according to Nugroho (2011:463) has four functions, namely explanation, compliance, audit and accounting. Through evaluation, the reality of program implementation can be captured and generalizations can be made about the patterns of relationships between the various dimensions of reality observed (NIM, 2015). (1) Explanation, evaluators can identify problems, conditions and actors that support the success or failure of policies; (2) Compliance, through evaluation it can be seen whether the actions of the actors, both bureaucracy and other actors, are in accordance with the standard procedures set by the policy; (3) Audit, through evaluation it can be seen whether the output actually reaches the group of policy recommendations, or whether there are leaks or irregularities; (4) Accounting, through evaluation we can find out what the economic consequences of the policy are.

William N. Dunn in Sudiro (2018:63) said that the term policy evaluation can be equated with interpretation, assessment and giving numbers. In this case, evaluation is about the value and benefits of a policy result, meaning that policy evaluation must provide clear and reliable information regarding the performance of a policy. More clearly, Dunn said that evaluation contributes to thinking about the values that underlie the selection of goals and targets. In general, a value can be criticized by asking in depth about the readiness of goals and targets. According to William N. Dunn, there are 6 policy evaluation criteria, namely effectiveness, efficiency, adequacy, alignment, responsiveness, accuracy.

## **RESEARCH METHODS**

When conducting research, we need to follow the applicable rules or principles, so that the research results obtained can be said to be valid using research methods. Research methods are a scientific way to obtain data with specific purposes and uses (Sugiyono, 2014). This research uses a qualitative approach with descriptive research type. A qualitative approach with a descriptive design was chosen because this research aims to explore clearer and more reliable information about the performance of risk-based business licensing policies in Kuningan Regency.

The selection of informants was carried out using purposive sampling, namely based on the consideration that the informants could provide complete and relevant information in accordance with the research objectives. The data collection and analysis techniques are carried out through:

1. Interview;

Interviews were conducted with 7 resource persons consisting of 1 person as the Coordinator for Intermediate Expert Licensing Management at the Kuningan Regency DPMPTSP, 1 person as the data manager at the Regency DPMPTSP, 3 people from the Community, and 1 person as the manager of derivative access rights for the OSS system at the Kuningan Regency Environmental Service and the Department Relationship of 1 person.

2. Field Studies;

Conduct direct observations in the field to observe the conditions of risk-based business licensing services.

3. Documentation Study

Collect secondary data in the form of official documents, reports and statistics from the Kuningan Regency PMPTSP Service.

Data analysis in this research was carried out using data collection techniques, simplifying and summarizing the data, presenting the data in the form of structured narratives, tables and pictures and finally drawing conclusions based on the data analysis that has been carried out.

## **RESULTS AND DISCUSSION**

Public policy is binding in nature, once an official policy is implemented, whether they like it or not, whether they like it or not, the public must implement the policy. This is what happens in the business licensing policy. Once the risk-based business licensing policy is officially implemented with the launch of the risk-based OSS system or OSS-RBA, all business licensing operations in all regions in Indonesia must follow the central government policy, including Kuningan Regency.

Since the policy was officially implemented, all business licensing activities in Kuningan Regency have been carried out in accordance with the provisions of the policy. However, in its implementation there are still many obstacles and problems found. The emergence of obstacles and problems in implementing risk-based business licensing policies encourages researchers to evaluate the performance of public policies using William N Dunn's theory where Dunn uses six main criteria to evaluate public policies, namely effectiveness, efficiency, adequacy, alignment, responsiveness and accuracy.

## 1. Effectiveness

"The effectiveness is a condition that shows how far the plan can be achieved and the goal or plan has been achieved (Siswoyo et al., 2019) ." A policy can be said to be effective if the policy achieves the desired results. The desired result of implementing risk-based business licensing is to improve the investment ecosystem through issuing business permits more effectively and simply. The implementation of a risk-based business licensing policy in Kuningan Regency is not fully effective in facilitating the business licensing process. For example, the Building Approval (PBG) process is one of the basic requirements for business licensing.

**Table 2 Recapitulation of the Number of IMB/PBG in Kuningan Regency**

DESCRIPTION	BEFORE OSS-RBA		AFTER OSS-RBA	
	IMB		PBG	
	2020	2021	2022	2023
Number of IMB I converted into PBG	1,551	2,317	193	198

Source: Data from the Kuningan Regency Investment and One-Stop Integrated Services Service

The table above shows that after the IMB changed to PBG, the number of building permit products issued in Kuningan Regency decreased drastically compared to when it was still an IMB. This decrease was caused by the following things:

- The length of the KKPR process is one of the PBG requirements because Kuningan Regency does not yet have an RDTR;
- There are more technical requirements for PBG than when it was still an IMB, so it is not uncommon for applicants to go back and forth to the technical service to complete the requirements;
- PBG levies are more expensive than IMB so that sometimes applicants delay payment of PBG levies which results in the PBG target not being achieved as depicted in table 1;
- The Building Management Information System (SIMBG) is not yet integrated, which is a system for processing PBG applications.

Based on these results, it can be concluded that the effectiveness of risk-based business licensing is still considered lacking in Kuningan Regency because the policy was not effective in resolving previous licensing problems, namely the process was complicated, long and expensive.

## 2. Efficiency

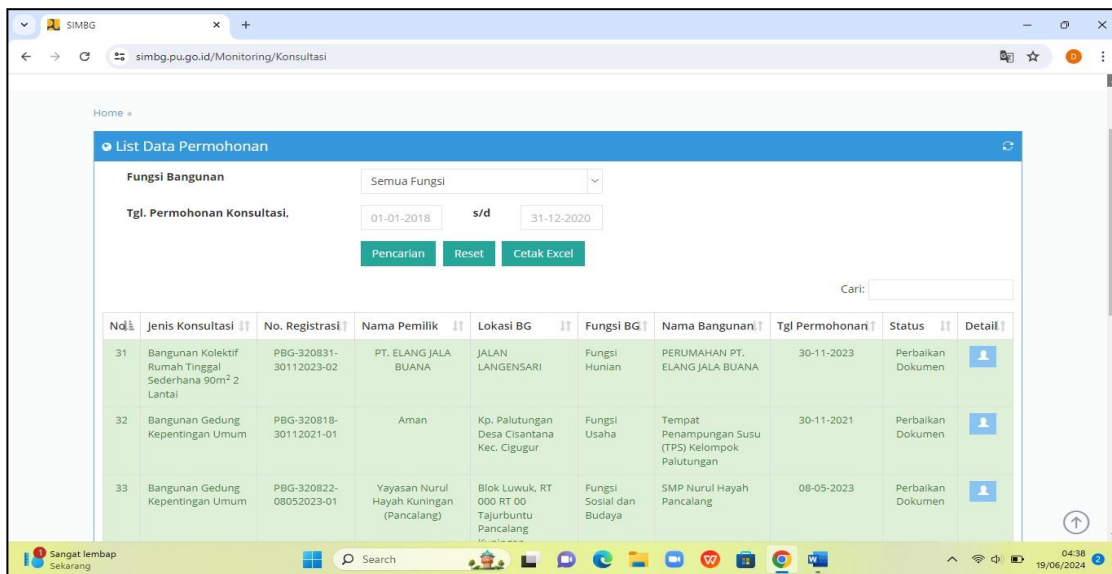
Policies that achieve the highest effectiveness with the smallest costs are called efficiency (Council et al., 2015). Efficiency is usually determined through calculating the unit cost of a product or service. In the implementation of risk-based business licensing, the only fee for the licensing process is the Building Approval (PBG) in the form of a levy for a building construction permit (Riau, 2022). The calculation of PBG levies in Kuningan Regency is regulated in Kuningan Regency Regional Regulation 1 of 2024 concerning Regional Taxes and Regional Levies. The PBG levy calculation is much larger than the IMB. For example, for calculating fees for the construction of a telecommunications tower with a height of 62 meters. Previously, when it was still an IMB, the levy fee for a telecommunications tower with a height of 62 meters was IDR. 5-6 million, but after switching to PBG the PBG levy value for telecommunications

towers of the same height is IDR. 36 million. Even though the PBG levy costs are greater than the IMB, the PBG levy has never been achieved as depicted in table 1.

The business licensing process itself for business activities with low, medium low, medium high and high risk levels is free or free. Based on the results of this research, it can be concluded that the risk-based business licensing policy is considered inefficient in reducing business licensing costs in Kuningan Regency.

### 3. Adequacy

"Adequacy is concerned with how far a level of effectiveness satisfies value needs, or opportunities that give rise to problems (Dunn, 2003). Adequacy here is closely related to performance. The extent to which the performance of a policy can satisfy society. When a policy cannot solve a problem, the policy is considered inadequate. Likewise with the implementation of risk-based business licensing policies in Kuningan Regency. Its adequacy is still not met because the policy is not effective and efficient in providing ease of business licensing. With this risk-based business licensing policy, many licensing processes are even delayed because it is difficult for applicants to fulfill the requirements as per the application below.



No.	Jenis Konsultasi	No. Registrasi	Nama Pemilik	Lokasi BG	Fungsi BG	Nama Bangunan	Tgl Permohonan	Status	Detail
31	Bangunan Kolektif Rumah Tinggal Sederhana 90m <sup>2</sup> 2 Lantai	PBG-320831-30112023-02	PT. ELANG JALA BUANA	JALAN LANGENSARI	Fungsi Hunian	PERUMAHAN PT. ELANG JALA BUANA	30-11-2023	Perbaikan Dokumen	
32	Bangunan Gedung Kepentingan Umum	PBG-320818-30112021-01	Aman	Kp. Palutungan Desa Cisantana Kec. Cigugur	Fungsi Usaha	Tempat Penampungan Susu (TPS) Kelompok Palutungan	30-11-2021	Perbaikan Dokumen	
33	Bangunan Gedung Kepentingan Umum	PBG-320822-08052023-01	Yayasan Nurul Hayah Kuningan (Pancalang)	Blok Luwuk, RT 000 RT 00 Tajurbuntu Pancalang	Fungsi Sosial dan Budaya	SMP Nurul Hayah Pancalang	08-05-2023	Perbaikan Dokumen	

**Figure 2: PBG application via SIMBG**

Source: <https://simbg.pu.go.id>,

The image above is an example of several applications in the SIMBG system that is still pending, in fact there are applications submitted since 2021 whose status is still being revised. Thus, it can be concluded that the business licensing policy has not been sufficient in facilitating the licensing process more effectively and simply.

#### 4. Alignment

This alignment is synonymous with justice. "Equity in public policy can be said to mean justice given and achieved by public policy targets. Equity criteria are closely related to legal and social rationality and refer to the distribution of consequences and efforts between different groups in society (Gooden & Starke, 2021)." The implementation of the risk-based business licensing policy in Kuningan Regency is considered not to have met the Alignment because not all business permits can be processed through the OSS-RBA system. For example, for urban transportation business permits on routes. This business permit cannot be done through OSS-RBA because it is constrained by requirements.

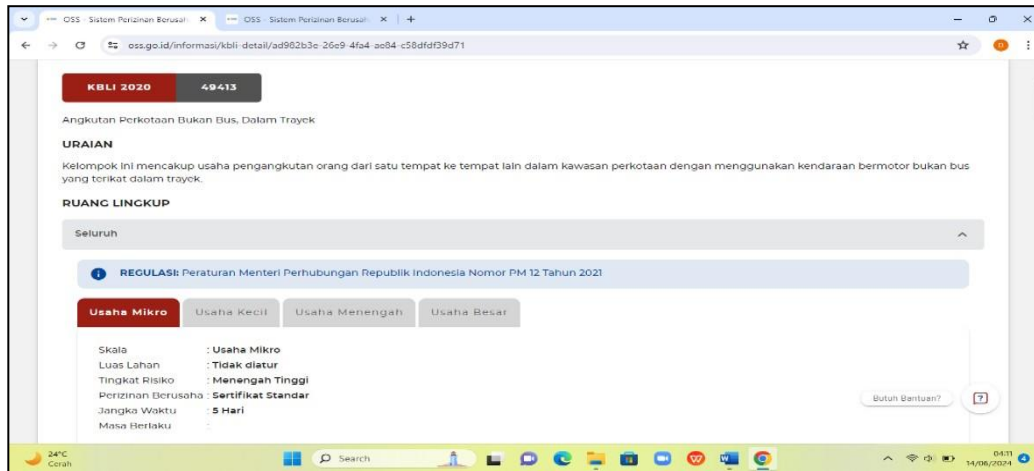


Figure 3. Business License with KBLI 49413 (Non-Bus Urban Transportation on Routes)  
Source: <https://oss.co.id>, 2024).

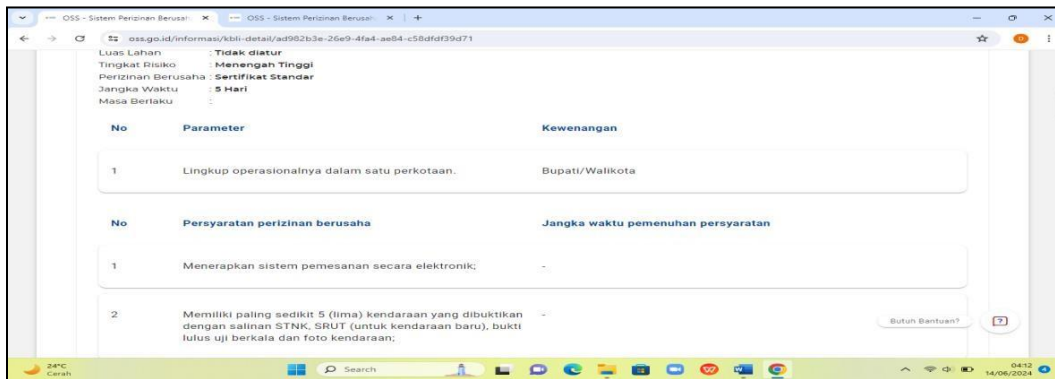


Figure 4. Business License Requirements with KBLI 49413 (Non-Bus Urban Transportation on Routes)  
(Source: <https://oss.co.id>, 2024).

In the picture above, it can be seen that to start a city transportation business permit, a business actor must have at least 5 vehicles. This is of course an obstacle when in Kuningan district, most city transportation business actors only have 1 vehicle, so the regional government of Kuningan Regency has adopted a policy for processing city transportation permits through the Si Cantik Cloud application, which is a system for managing permits developed by the Ministry of Communication and Information of the Republic of Indonesia (Riyan & Nendi, 2024).

## 5. Responsiveness

According to William N. Dunn, responsiveness concerns the extent to which a policy can satisfy the needs, preferences or values of certain groups of society (Bachtiar, 2023). Responsiveness regarding the implementation of risk-based business licensing policies in Kuningan Regency is considered quite well. This can be seen from the increase in the number of legal business permits issued since this policy was implemented.

**Table 3 Recapitulation of IUMK in Kuningan Regency**

DESCRIPTION	BEFORE OSS-RBA		AFTER OSS-RBA	
	2020	2021	2022	2023
IUMK recapitulation	2,302	2,774	12,109	15,581

Source: Data from the Kuningan Regency Investment and One-Stop Integrated Services Service

The table above is a comparison of the number of Micro and Small Business Licenses (IUMK) issued before and after OSS-RBA. Based on the table above, it can be seen that the number of IUMK issued after OSS-RBA increased significantly. This is because business permits with low and medium low risk levels are automatically issued from the OSS system without any verification from the technical service or the PMPTSP Service and most MSE activities in Kuningan Regency have low and medium risk levels so that MSE actors really welcome this policy and register its legality business through the OSS system.

## 6. Accuracy

Accuracy here refers to the impact of implementing a policy. Risk-based business licensing policies provide both positive and negative impacts. The positive impact is in the form of ease in obtaining risk-based business permits, especially business activities with low and medium low risk levels. Meanwhile, the negative impact is in the form of a long process of fulfilling basic requirements which results in:

- The slow implementation of business activities has an impact on the investment ecosystem in Kuningan Regency.
- Increasing licensing violations where many buildings were built before the PBG was issued.
- Increasing public complaints regarding permits, both in writing and verbally.

Based on the facts on the ground regarding the implementation of this policy in Kuningan Regency, it can be concluded that the accuracy of implementing the risk-based business licensing policy in Kuningan Regency is still not fulfilled due to the existence of new problems that have arisen since this policy was implemented.

Based on the results of the evaluation of the risk-based business licensing policy in Kuningan Regency using William M. Dunn's theory which uses six main criteria where only 1 criterion has been met, namely responsiveness, it can be concluded that the risk-based business licensing policy in Kuningan Regency has not been able to improve the investment ecosystem. In Kuningan Regency because this policy has not made it easier to issue business permits more effectively and simply.

To overcome the problems that arise in implementing risk-based business licensing, the Kuningan Regency government has issued a regional policy so that public service activities in the licensing sector continue to run, including;

- a. Establishing a Regional Spatial Planning Forum (FPRD) to determine the suitability of business activity locations with the Kuningan Regency RTRW because Kuningan Regency does not yet have an RDTR;
- b. Using the old licensing system, namely Si Cantik Cloud, to process business permits that cannot be processed in the OSS-RBA system.

## CONCLUSION

The implementation of risk-based business licensing policies in accordance with PP Number 5 of 2021 has not been able to improve the investment ecosystem by providing ease of issuing business permits more effectively and simply in Kuningan Regency. Based on the evaluation results using William N. Dunn's theory, which includes six main criteria in evaluating public policy, only one criterion was met, namely responsiveness with increasing legality of MSEs in Kuningan Regency. Five other criteria have not been met, namely: effectiveness, because the risk-based licensing policy has not been effective in providing ease of business licensing; efficiency, because there is an increase in levy costs when IMB is converted into PBG, but PBG levies do not reach the target; adequacy, because the policy does not resolve the problem of complicated, lengthy, and expensive prior permits; equality, because not all business permits can be processed in the OSS system in accordance with PP Regulation Number 5 of 2021; and accuracy, because the policy creates new problems in business licensing. To overcome problems in implementing risk-based business licensing, the Kuningan Regency government has issued a regional policy so that public services in the licensing sector continue to run. These policies include: establishing a Regional Spatial Planning Forum (FPRD) to determine the suitability of business activity locations with the RTRW of Kuningan Regency because Kuningan Regency does not yet have an RDTR, as well as using the old licensing system, namely Si Cantik Cloud, to process business permits that cannot be processed in the OSS system -RBA.

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