

IMPLEMENTATION OF REGULATION OF THE MINISTER OF LAW AND HUMAN RIGHTS NO. 18 OF 2022 AS A GUIDELINE FOR THE MPASPOR APPLICATION IN PASSPORT SERVICES AT THE CLASS I NON-TPI IMMIGRATION OFFICE IN PALANGKARAYA

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Abstract

The main issue in the implementation of the Minister of Law and Human Rights Regulation Number 18 of 2022 as the guideline for the use of the M-Paspor application in passport services lies in the suboptimal effectiveness of digital-based service implementation. The gap between *das sollen* and *das sein* indicates that although the Regulation has established a passport service mechanism that is fast, accessible, transparent, and accountable through the M-Paspor application, its implementation still encounters various obstacles, including system disruptions, limited information technology infrastructure, restricted service quotas, low levels of public digital literacy, inconsistencies in applicants' data, and inadequate human resource competencies. These conditions have the potential to reduce the effectiveness of passport services and diminish public satisfaction as service users. This study employed an empirical legal research method using empirical data obtained through interviews and direct field observations. The research was conducted to examine the effectiveness of the implementation of the Minister of Law and Human Rights Regulation Number 18 of 2022 as the guideline for the M-Paspor application in passport services at the Class I Non-TPI Palangka Raya Immigration Office and to analyze the obstacles encountered along with the efforts undertaken to address them. The results indicate that the implementation of the Minister of Law and Human Rights Regulation Number 18 of 2022 as the guideline for the M-Paspor application at the Class I Non-TPI Palangka Raya Immigration Office has generally been effective in improving the efficiency, transparency, and quality of passport services. Nevertheless, its implementation continues to face various technical and non-technical obstacles. Efforts to overcome these challenges include strengthening information technology infrastructure, regularly updating the M-Paspor application system, enhancing the competence of service personnel, increasing public awareness through continuous socialization of the M-Paspor application, and strengthening coordination between the Immigration Office and the Directorate General of Immigration. These measures are expected to create passport services that are more effective, efficient, professional, and capable of providing legal certainty to the public.

Keywords: Minister of Law and Human Rights Regulation Number 18 of 2022, M-Paspor, Passport Services, Immigration.

A. INTRODUCTION

Indonesia is a state based on the rule of law, as emphasized in Article 1 Paragraph (3) of the 1945 Constitution of the Republic of Indonesia, which states that "Indonesia is a state based on law." The consequence of this principle is that all aspects of public life, including government activities and public services, must be grounded in applicable law. Law functions not only as a regulatory tool, but also as a means of protection for the public to ensure their rights are not violated by government actions or third parties. Consequently, every form of public service provided by the government must guarantee legal certainty, fairness, and protection for the public as service users.

In the Indonesian legal system, legal protection for the public is comprehensively regulated across various laws and regulations. Article 28D Paragraph (1) of the 1945 Constitution of the Republic of Indonesia states that "Every person shall have the right to the recognition, guarantees, protection, and fair legal certainty as well as equal treatment before the law." This provision underscores that the state holds a constitutional obligation to provide legal protection to every citizen in all activities, including when receiving public services. This legal protection is critical because an imbalance of power exists in the relationship between the public and the government, where the government possesses greater authority.

Furthermore, legal protection in public services is specifically regulated under Law Number 25 of 2009 concerning Public Services. According to Article 1 point 1 of Law Number 25 of 2009 concerning Public Services, "Public service refers to activities or a series of activities aimed at fulfilling service needs in accordance with laws and regulations for every citizen and resident regarding goods, services, and/or administrative services provided by public service providers." This provision indicates that public service is a state obligation that must be carried out professionally, transparently, and accountably.

Additionally, Article 4 point g of Law Number 25 of 2009 concerning Public Services stipulates that the provision of public services must be based on the principle of legal certainty. Furthermore, Article 18 of Law Number 25 of 2009 concerning Public Services states that members of the public, as service users, are entitled to receive quality services in accordance with service standards. Consequently, if disruptions or failures occur within a service system, they have the potential to inflict losses on the public and raise legal issues regarding the service provider's accountability.

Advancements in information and communication technology have brought significant changes to various aspects of life, including public service delivery. Digital transformation has driven the government to develop electronic-based service systems (*e-government*) to enhance service efficiency, effectiveness, and transparency. Utilizing digital technology in public services aims not only to accelerate processing times, but also to provide easier access for the public (Rindingpadang, 2025).

In the field of immigration, the government through the Directorate General of Immigration has developed the M-Paspor application as a digital-based public service

innovation. This application is an evolution of the previous system, the Online Passport Queue Registration Application (*APAPO*), which had limited functionality. M-Paspor was introduced as a solution to offer convenience to the public during the online passport application process. The application was officially launched in 2022 as part of the digital transformation in immigration services (MFN, 2023).

Using the M-Paspor application allows the public to complete registration, upload documents, make payments, and schedule interview appointments online. This offers significant convenience and efficiency, as citizens no longer need to visit immigration offices in person for initial registration. Through this system, services are expected to become faster, more transparent, and more accountable (FA, 2023).

Nevertheless, implementing technology in public services comes with various challenges. Based on research findings, using the M-Paspor application still encounters several issues, such as system outages, server errors, and quota limitations that frequently fill up quickly. Moreover, other technical obstacles persist, including improperly uploaded data, unverified payments, and system failures in processing applications (ME, 2024).

System disruptions in the M-Paspor application represent one of the issues most frequently complained about by the public. In some instances, these disruptions stem from external factors, such as issues within central systems that prevent services from running properly. This condition inevitably disrupts service delivery and has the potential to disadvantage citizens as service users (Febriani, 2024).

In addition, other studies demonstrate that disruptions to the M-Paspor application can impede the effectiveness of immigration services and generate public dissatisfaction. Such outages lead not only to service delays, but can also result in application cancellations, data errors, and uncertainty within the service workflow (Natalia & Ardiansyah, 2025).

From a legal standpoint, system failures in digital public services raise questions regarding the liability of service providers and the legal protections available to the public. This issue is vital because citizens, as service users, have a right to receive proper service without suffering losses caused by system errors or failures.

In the context of immigration services, the legal basis for issuing passports is governed by Law Number 6 of 2011 concerning Immigration. According to Article 1 point 13 of Law Number 6 of 2011 concerning Immigration, a "Passport of the Republic of Indonesia is a document issued by the Government of the Republic of Indonesia to an Indonesian citizen to travel across international borders, valid for a specified period." Furthermore, Article 24 Paragraph (1) of Law Number 6 of 2011 concerning Immigration states that "Every person traveling outside the territory of Indonesia is required to possess a valid travel document."

Further regulations regarding passports are stipulated in Regulation of the Minister of Law and Human Rights Number 8 of 2014 concerning Ordinary Passports and Travel Documents in Lieu of Passports. Article 4 of Regulation of the Minister of Law and Human Rights Number 8 of 2014 states that "Ordinary passports are issued by the Minister or designated Immigration Officials." Additionally, this regulation details application procedures, requirements, and passport issuance mechanisms.

Alongside technological developments, passport services previously handled manually have transitioned to a digital system through the M-Paspor application. This system integrates multiple service stages into a single digital platform, ranging from registration to passport issuance. Generally, using the M-Paspor application involves several steps: account registration, personal data entry, document uploading, payment, and interview scheduling at an immigration office.

Although designed to streamline services, the system still encounters various operational hurdles. A primary constraint involves system disruptions that delay service processing. These outages can manifest as application errors, server downtime, or mismatches in data uploaded by applicants. Additionally, issues arise regarding unconfirmed payments and system failures when processing applicant data.

Another challenge is the public's lack of familiarity with operating the M-Paspor application, which results in errors when uploading documents or inputting data. This highlights that alongside technical factors, human factors also contribute to difficulties when using the application.

From a state administrative law perspective, public services that harm the public can be classified as an unlawful act by the government (*onrechtmatige overheidsdaad*) if the service fails to meet established standards or inflicts losses on citizens. This concept is particularly relevant to digital services like the M-Paspor application, where system failures directly hinder the fulfillment of citizens' rights.

Under Article 1 Paragraph (3) of the 1945 Constitution of the Republic of Indonesia, which states that "Indonesia is a state based on law," every governmental action—including public service delivery—must comply with the law and must not harm the public. Furthermore, Article 28D Paragraph (1) of the 1945 Constitution of the Republic of Indonesia guarantees that "Every person shall have the right to the recognition, guarantees, protection, and fair legal certainty," meaning that public service disruptions caused by system errors can be categorized as a violation of the right to legal certainty.

Further provisions are set out in Law Number 25 of 2009 concerning Public Services. Article 4 point g of Law Number 25 of 2009 stipulates that the provision of public services must adhere to the principle of legal certainty. Furthermore, Article 18 point a of Law Number 25 of 2009 states that the public is entitled to quality services that conform to service standards. If a system outage prevents service access or causes delays, a legal deviation from these service principles and standards has occurred.

Moreover, the responsibility of service providers is reinforced in Article 19 of Law Number 25 of 2009 concerning Public Services, which states that public service providers are obligated to deliver services in accordance with established standards. Failing to fulfill this duty carries legal consequences, ranging from obligations to rectify the service to providing compensation to the public.

Within digital systems, using the M-Paspor application is also subject to Law Number 11 of 2008 concerning Electronic Information and Transactions, as amended by Law Number 19 of 2016. Article 15 Paragraph (1) of Law Number 11 of 2008 concerning Electronic Information and Transactions states that "Every Electronic System Provider shall operate

Electronic Systems in a reliable and secure manner and shall be responsible for the proper operation of the Electronic System." Therefore, if errors or system outages occur within the M-Paspor application, the provider holds legal responsibility for that system failure.

In the execution of M-Paspor services, detrimental forms of service caused by system outages can be categorized as follows:

- **System errors during data entry and document upload:**
Applicants are unable to complete the registration process because the application encounters errors or fails to save data. This forces applicants to restart the process from the beginning, causing loss of time and money.
- **Server downtime during the payment process:**
The applicant has completed the payment, but due to lack of system integration, the payment status is not recognized. Consequently, the application cannot proceed to the next stage.
- **System disruptions during verification at the Immigration Office:**
When applicants arrive according to their scheduled appointments, the system fails to access their data, resulting in postponed or canceled interview and biometric processing.
- **System failures during rescheduling:**
Applicants are unable to select a new appointment slot due to system errors, thereby forfeiting their service opportunity.

Legally, these conditions can be categorized as:

1. Maladministration (Ombudsman Law)
2. Violations of public service standards (Public Services Law)
3. Electronic system failures (ITE Law)

A citizen named Andi (pseudonym) applied for a passport through the M-Paspor application for employment overseas. Andi completed all stages, from account registration and data entry to paying the passport fee in accordance with regulations.

After securing an interview schedule at the Class I Non-TPI Immigration Office in Palangkaraya, Andi arrived at the appointed time. However, during the verification process, a system outage occurred on the central network, preventing immigration officers from accessing Andi's application data.

As a result of this outage:

- The interview and biometric procedures could not be conducted;
- Andi was asked to wait without a definite timeline;
- The system did not allow for immediate rescheduling;
- Andi suffered losses in the form of transportation costs, missed work time, and delayed overseas departure plans.

This incident demonstrates a failure in the delivery of electronic-based public services. Under Article 15 Paragraph (1) of Law Number 11 of 2008 concerning Electronic Information

and Transactions, electronic system providers are obligated to ensure system reliability. Disruptions rendering service delivery impossible indicate that this duty has not been fulfilled.

Furthermore, pursuant to Article 18 point a of Law Number 25 of 2009 concerning Public Services, the public is entitled to receive quality services. In this case, that right was unfulfilled because the service could not be rendered due to system failure.

Additionally, this condition can be categorized as maladministration in the form of protracted delay (*penundaan berlarut*), as recognized in oversight practices by the Ombudsman of the Republic of Indonesia, because the service was not delivered within the proper timeframe without a valid justification from the service user's perspective.

Legal Implications:

- The public reserves the right to submit formal complaints;
- Service providers are obligated to rectify and upgrade system operations;
- Potential grounds exist for claiming compensation;
- The government is obligated to guarantee that similar system failures do not recur.

Table 1. Passport Service Data via the M-Paspor Application at the Class I Non-TPI Immigration Office in Palangka Raya, 2023–2025

Years	Number of Passport Applications	Number of M-Paspor Users	M-Paspor Usage Percentage (%)	Request Successfully Completed
2023	8.250	5.360	64,97%	7.980
2024	9.780	7.430	75,97%	9.480
2025	11.150	9.320	83,59%	10.890

Source: Class I Non-TPI Immigration Office Palangka Raya, 2023–2025.

Table 2. Data on System Disruptions and Public Complaints Regarding M-Paspor Services at the Class I Non-TPI Immigration Office Palangka Raya, 2023–2025.

Years	Number of System Disturbances	Number of Public Complaints	Predominant Types of Issues/Complaints
2023	118	172	Login failures, slow application performance, difficulty selecting a schedule
2024	94	138	Document upload errors and queue capacity limits
2025	71	105	Data synchronization issues and NIK verification problems

Source: Class I Non-TPI Immigration Office Palangka Raya, Years 2023–2025.

Based on Table 1, the number of passport applications at the Class I Non-TPI Immigration Office in Palangka Raya during the 2023–2025 period demonstrates an upward trend. In 2023, the number of passport applications was recorded at 8,250 applications, subsequently increasing to 9,780 applications in 2024 and reaching 11,150 applications in 2025. This increase indicates growing public demand for passport issuance services alongside higher adoption of digital-based immigration services.

The number of M-Paspor application users also experienced an increase from 5,360 users in 2023 to 7,430 users in 2024 and 9,320 users in 2025. The percentage of M-Paspor usage increased from 64.97% in 2023 to 75.97% in 2024, reaching 83.59% in 2025. These figures indicate that the public has increasingly accepted the M-Paspor application as an electronic passport submission tool perceived to be easier, faster, and more efficient. This growth in digital service usage aligns with the public service digital transformation policies implemented by the Directorate General of Immigration.

Furthermore, the number of successfully processed applications also rose from 7,980 applications in 2023 to 9,480 applications in 2024 and 10,890 applications in 2025. These data demonstrate that passport service performance via the M-Paspor application has generally become more effective in meeting public demand despite the continuous increase in overall applications.

Meanwhile, based on Table 2, the number of system disruptions in M-Paspor services during the 2023–2025 period shows a downward trend. In 2023, 118 system outages were recorded, decreasing to 94 outages in 2024 and 71 outages in 2025. This reduction reflects ongoing system improvements and enhancements, leading to improved application stability over time.

In tandem with the decrease in system outages, public complaints also declined from 172 complaints in 2023 to 138 complaints in 2024 and 105 complaints in 2025. In 2023, public complaints were dominated by login failures, slow application performance, and difficulties in selecting appointment schedules. In 2024, complaints were primarily related to errors during document uploads and quota limits for service queues. Meanwhile, in 2025, dominant complaints pertained to data synchronization and National Identification Number (NIK) verification processes.

Advancements in information technology have driven the government to pursue digital transformation in public service delivery, including within the field of immigration. One form of this transformation is the implementation of electronic-based passport services through the M-Paspor application, governed by Regulation of the Minister of Law and Human Rights Number 18 of 2022 concerning Ordinary Passports and Travel Documents in Lieu of Passports. This policy aims to enhance passport service quality so that it becomes faster, easier, transparent, and provides legal certainty to the public. This aligns with Article 4 point g of Law Number 25 of 2009 concerning Public Services, which emphasizes that public services must be grounded in the principle of legal certainty, as well as Article 18 point a, which grants citizens the right to receive quality services in accordance with service standards.

Despite having a clear legal foundation, the implementation of Permenkumham Number 18 of 2022 has not been fully effective in achieving its intended goals. This lack of effectiveness is demonstrated not only by recurring disruptions in M-Paspor services, but also by the suboptimal execution of provisions regarding electronic-based passport services. Obstacles include the readiness of information technology infrastructure, human resource competence, service execution coordination, and the absence of a legal mechanism ensuring resolution when system outages occur. These conditions highlight a gap between the normative provisions set

out in Permenkumham Number 18 of 2022 and their operational reality, preventing the full realization of an effective, efficient, and quality service.

The ineffective implementation of Permenkumham Number 18 of 2022 gives rise to legal issues requiring further attention. Disruptions in electronic-based services have the potential to diminish legal certainty and hinder the fulfillment of citizens' rights as service users. Yet, Article 15 Paragraph (1) of Law Number 11 of 2008 concerning Electronic Information and Transactions stipulates that electronic system providers are obligated to operate electronic systems in a reliable, secure, and responsible manner. Conversely, Permenkumham Number 18 of 2022 does not yet specify detailed procedures for resolving system failures, defining provider liability, or safeguarding applicants who suffer losses due to M-Paspor service disruptions. Consequently, legal uncertainty persists in the execution of electronic-based passport services.

Based on the background and observed symptoms detailed above, the research problems in this study are formulated as follows: The effectiveness of implementing Permenkumham No. 18 of 2022 as a guideline for the M-Paspor application in passport services at the Class I Non-TPI Immigration Office in Palangka Raya. The disruptions and obstacles resulting from non-compliance or discrepancies in the implementation of Permenkumham No. 18 of 2022 as a guideline for the M-Paspor application in passport services at the Class I Non-TPI Immigration Office in Palangka Raya. The resolution efforts undertaken to address these issues.

B. LITERATURE REVIEW

Legal Effectiveness Theory (Soerjono Soekanto)

The Legal Effectiveness Theory explains that whether a legal rule operates effectively within society depends on five main correlated factors. Law cannot function independently without being supported by regulatory certainty, the readiness of executing officials, and the availability of adequate technical facilities on the ground. Public legal awareness and prevailing legal culture also determine whether a rule can be executed according to its original legislative purpose. If any single factor encounters constraints, the implementation of the law will experience a gap between normative provisions and practical execution. Therefore, the effectiveness of implementing Permenkumham No. 18 of 2022 alongside the M-Paspor application must be measured comprehensively by evaluating these five factors:

- **Legal Factor (Statutes/Regulations):** The clarity and certainty of normative rules within Permenkumham No. 18 of 2022 as guidelines for digital-based passport services.
- **Law Enforcement/Apparatus Factor:** The competence, readiness, and skills of immigration officers in operating the system and serving applicants.
- **Facilities or Infrastructure Factor:** The availability of information technology infrastructure, such as stable internet connectivity, server reliability, and computer hardware.
- **Society Factor:** The capability, understanding, and digital literacy level of passport applicants when using the M-Paspor application.
- **Cultural Factor:** Public habits and awareness as well as the work culture of officials in adapting to electronic-based service systems.

Public Service Theory (Lijan Poltak Sinambela)

<http://jurnaldialektika.com/>

Public Service Theory focuses on the duty of state administrators to fulfill public needs for goods, services, or administrative functions in a transparent, efficient, and accountable manner. Service transformation through digitalization such as the utilization of the M-Paspor application is directed toward simplifying procedures while providing certainty regarding time and costs for service users. The quality of a public service is determined by an agency's ability to minimize technical obstacles that could potentially harm or cause dissatisfaction among the public. The success of good governance relies heavily on the extent to which service standards are consistently met. Therefore, the effectiveness of M-Paspor-based passport services is measured by how optimally the rights of the public as service users are fulfilled:

- **Simplicity of Procedures:** The straightforwardness of registration flows, data entry, and uploading required documents through the application.
- **Certainty of Completion Time:** The clarity and accuracy of service schedules, ranging from online registration to interview stages and passport issuance.
- **Cost Transparency:** The clarity of official fees for passport issuance and the convenience of electronic payment mechanisms.
- **Reliability and Accessibility:** The stability of the M-Paspor application and the availability of queue quotas accessible to the public.
- **Quality of Apparatus Responsiveness:** The capability and speed of immigration officers in handling complaints and technical disruptions experienced by applicants.

C. RESEARCH METHODOLOGY

This study utilizes an empirical legal research method (*yuridis empiris*), examining the law through empirical facts obtained from interviews and direct field observations. The study aims to analyze the gap between legal norms as they ought to be (*das sollen*) and their practical execution (*das sein*).

Within the context of this study, electronic passport service delivery via the M-Paspor application is normatively regulated under Law Number 6 of 2011 concerning Immigration, Law Number 25 of 2009 concerning Public Services, Law Number 11 of 2008 concerning Electronic Information and Transactions, and Regulation of the Minister of Law and Human Rights Number 18 of 2022 concerning Ordinary Passports and Travel Documents in Lieu of Passports. These legal frameworks mandate that public services be delivered professionally, guarantee legal certainty, and be supported by reliable electronic systems. However, practical implementation at the Class I Non-TPI Immigration Office in Palangka Raya still encounters various obstacles, such as application errors, server outages, data verification failures, and service delays that potentially inflict losses on the public. This discrepancy serves as the primary rationale for conducting this research to evaluate legal protections for the public against system failures in M-Paspor application-based passport services.

This study is descriptive in nature, seeking to systematically and factually portray the implementation of M-Paspor-based passport services alongside the issues arising from system outages. The data collected comprises: **Primary Data:** Obtained through direct interviews with passport service officers, M-Paspor system operators, the Head of the Immigration Traffic Section, and passport applicants representing the public. **Secondary Data:** Collected through

literature studies of relevant statutory regulations, books, scientific journals, and legal scholarship.

Data collection was carried out via literature review and direct interviews. The gathered data was subsequently analyzed using qualitative methods with an inductive reasoning approach, drawing general conclusions from specific field findings.

D. RESULT AND DISCUSSION

Effectiveness of Implementing Regulation of the Minister of Law and Human Rights Number 18 of 2022 as Guidelines for the M-Paspor Application in Passport Services at the Class I Non-TPI Immigration Office in Palangka Raya

The implementation of Regulation of the Minister of Law and Human Rights (Permenkumham) Number 18 of 2022 represents a form of public service reform in the field of immigration aimed at enhancing the quality of passport issuance services through the use of information technology. This regulation amends several provisions of Permenkumham Number 8 of 2014, particularly regarding passport validity periods, public service delivery, and adaptation to electronic-based service systems, including the use of the M-Paspor application. The introduction of this application is part of a public service transformation prioritizing effective, efficient, transparent, and accountable principles.

The effectiveness of implementing Permenkumham Number 18 of 2022 at the Class I Non-TPI Immigration Office in Palangka Raya can be analyzed using the indicators of legal effectiveness proposed by Soerjono Soekanto, namely legal factors, law enforcement personnel, facilities and infrastructure, society, and legal culture (Soerjono, 2019). The legal substance of Permenkumham Number 18 of 2022 provides clear guidelines regarding digital passport service mechanisms. Through M-Paspor, citizens can register, upload required documents, select appointment schedules, and make electronic payments prior to arriving at the immigration office. This policy has streamlined administrative processes previously handled manually, rendering services simpler, more efficient, and measurable (Ridwan, 2023).

The successful implementation of the M-Paspor application is also determined by the quality of the executing personnel. Officials are required to possess the competence to operate digital systems while assisting members of the public who experience difficulties using the application. The role of personnel extends beyond administrative functions to acting as facilitators who ensure smooth service workflows. Human resource competence represents an essential element in delivering quality public services. Sedarmayanti emphasizes that public service quality is heavily influenced by the competence of service-providing personnel (Sedarmayanti, 2018).

The availability of information technology facilities and infrastructure further dictates the effectiveness of M-Paspor adoption. Digital service systems require stable internet connectivity, adequate computer hardware, reliable servers, and seamless data integration with the central system of the Directorate General of Immigration. Disruptions in any of these components can impede service delivery and impact public satisfaction. Therefore, the successful execution of Permenkumham Number 18 of 2022 relies not only on regulatory quality, but also on the readiness of IT infrastructure supporting daily operations (Agus, 2021).

The deployment of the M-Paspor application at the Class I Non-TPI Immigration Office in Palangka Raya has fundamentally provided convenience for citizens acquiring passport services. Most administrative steps can be completed before applicants arrive on-site, shortening service times. Electronic queuing systems also reduce applicant crowding at service counters, resulting in more orderly and scheduled processing. This reflects the practical application of *e-government* concepts that utilize information technology to boost public service effectiveness and efficiency (Richardus, 2016).

These conveniences have not entirely eliminated operational challenges. Portions of the public, particularly elderly applicants or individuals with limited digital literacy, still face difficulties operating the M-Paspor application. Other obstacles—such as system outages, document upload failures, and limited queue quotas within the application—continue to occur, occasionally requiring applicants to re-register. These conditions demonstrate that digital policy implementation requires continuous outreach and user support to ensure optimal application adoption (Cahyono, 2023).

Ultimately, the effectiveness of public services is measured not only by the availability of regulations, but also by public satisfaction levels. According to Sinambela, effective public services are characterized by procedural simplicity, certainty of completion time, cost transparency, and the provider's ability to fulfill public needs (Lijan, 2019). If these indicators are consistently realized, the objective of establishing Permenkumham Number 18 of 2022 as the basis for digital-based passport services can be considered achieved.

Overall, the implementation of Permenkumham Number 18 of 2022 as guidelines for the M-Paspor application at the Class I Non-TPI Immigration Office in Palangka Raya has demonstrated a strong level of effectiveness. Service digitalization has improved administrative efficiency, accelerated processing times, reduced queues, and supported transparency in public service delivery. Continued optimization remains necessary by upgrading IT infrastructure, strengthening human resource competencies, refining application features, and enhancing public digital literacy. Improvements in these areas are expected to realize passport services that are increasingly professional, accessible, and aligned with good governance principles.

Disruptions, Obstacles, and Resolution Efforts Regarding Discrepancies in the Implementation of Permenkumham Number 18 of 2022 as Guidelines for the M-Paspor Application at the Class I Non-TPI Immigration Office in Palangka Raya

The implementation of Permenkumham Number 18 of 2022 as guidelines for the M-Paspor application is not exempt from various disruptions and obstacles that affect its operational effectiveness. Although the regulation outlines simpler, more efficient digital service mechanisms, practical discrepancies remain between normative provisions and field conditions. Unaddressed discrepancies can diminish public service quality if not resolved through continuous improvement measures. Permenkumham Number 18 of 2022 is fundamentally aimed at achieving faster, easier, transparent, and accountable passport services through process digitalization.

Among the most frequent obstacles are technical disruptions within the M-Paspor application. Issues such as login failures, slow application performance, data synchronization

errors, and document upload failures are still experienced by the public. These conditions prevent applicants from completing registration according to proper procedure, forcing them to restart the application process or wait until system operations resume. Such technical hurdles indicate that IT infrastructure readiness remains a critical determinant in digital service implementation.

Service quota constraints within the application also present challenges. At certain times—especially during peak passport request periods ahead of Hajj, Umrah, or holiday seasons—available service quotas fill up quickly. Consequently, citizens encounter difficulties securing appointment slots despite having prepared all administrative requirements. Research on M-Paspor implementation highlights that quota management requires ongoing evaluation to align application volume with the operational capacity of individual immigration offices (Nabila et al., 2025).

A further obstacle relates to public capability in utilizing digital-based services. Not all applicants possess adequate digital literacy, particularly elderly citizens or individuals residing in areas with limited internet access. Difficulty navigating registration steps, uploading documents, or making electronic payments means some applicants still require direct assistance from service staff. This demonstrates that digital transformation must be accompanied by capacity building for service users to achieve its intended goals.

Another issue involves data discrepancies between civil registration documents and information entered into the M-Paspor application. Variations in names, birth dates, or identification numbers often lead to automated system rejections, requiring manual secondary verification. These discrepancies prolong processing times and increase staff workloads due to re-examination procedures. This highlights the importance of inter-agency data integration to render identity verification faster and more accurate.

Service operations are also influenced by internal organizational factors, specifically human resource readiness. Staff members must maintain technical proficiency in operating the M-Paspor application while providing user guidance. Where technical capabilities are uneven, service quality can vary among officers, impacting overall public satisfaction. Studies on digital passport service implementation show that staff competency and applicant education are primary factors driving successful electronic service delivery (I Made & I Gusti, 2024).

Field conditions at the Class I Non-TPI Immigration Office in Palangka Raya are also susceptible to internet bandwidth constraints and central server connectivity issues. Because M-Paspor relies on a nationally integrated framework, central server outages directly affect regional service points. Consequently, data verification, biometric capture, and passport printing can suffer delays even when on-site staff follow proper procedures. Resolving these challenges requires close coordination between local immigration offices and the Directorate General of Immigration to enable swift system recovery.

Resolving these various obstacles requires a comprehensive approach. Upgrading IT infrastructure serves as a primary step through server reinforcement, network stability enhancements, and M-Paspor application feature refinements to make the platform more responsive to user needs. Periodic system audits are necessary to identify recurring technical issues for prompt software updates. Policy evaluations of M-Paspor recommend developing a

more stable application architecture, establishing cross-agency data integration, and improving interface design for greater user accessibility.

Human resource development is equally vital to overcoming implementation hurdles. Immigration offices should conduct regular technical training for service personnel focusing on application operations, system disruption troubleshooting, and digital public relations. Concurrently, public outreach detailing application procedures should be expanded across social media, official websites, and direct consultation desks. This education aims to improve digital literacy, thereby minimizing user errors during registration. Optimizing coordination with external agencies—particularly the Directorate General of Immigration and civil registry authorities—is essential to reduce identity data mismatches. System integration will accelerate document verification and minimize application rejections caused by administrative discrepancies. Through technological upgrades, staff competency enhancements, expanded public outreach, and strengthened inter-agency synergy, the implementation of Permenkumham Number 18 of 2022 as guidelines for the M-Paspor application in Palangka Raya can operate more effectively, efficiently, and with greater service certainty.

E. CONCLUSION

The implementation of Regulation of the Minister of Law and Human Rights Number 18 of 2022 as guidelines for the M-Paspor application at the Class I Non-TPI Immigration Office in Palangka Raya has proceeded quite effectively in enhancing the efficiency, transparency, and quality of passport services. Nevertheless, optimizing technology infrastructure, improving officer competency, and strengthening public digital literacy remain essential to support a more professional and sustainable service.

The disruptions and obstacles arising from discrepancies in implementing Permenkumham Number 18 of 2022 as guidelines for the M-Paspor application in passport services at the Class I Non-TPI Immigration Office in Palangka Raya, along with their resolution efforts, demonstrate that M-Paspor implementation still faces technical hurdles, infrastructure limitations, low public digital literacy, data mismatches, and human resource competencies. Resolving these issues requires strengthening information technology systems, building officer capacity, conducting continuous public outreach, and enhancing inter-agency coordination to realize an effective, efficient, and high-quality passport service.

REFERENCES

- Agus Dwiyanto, 2021, *Mewujudkan Good Governance melalui Pelayanan Publik*, Gadjah Mada University Press, Yogyakarta
- Lijan Poltak Sinambela, 2019, *Reformasi Pelayanan Publik: Teori, Kebijakan, dan Implementasi*, Bumi Aksara, Jakarta
- Richardus Eko Indrajit, 2016, *Electronic Government*, Andi, Yogyakarta
- Ridwan HR, 2023, *Hukum Administrasi Negara*, Rajawali Pers, Depok
- Sedarmayanti, 2018, *Reformasi Administrasi Publik, Reformasi Birokrasi, dan Kepemimpinan Masa Depan*, Refika Aditama, Bandung

- Soerjono Soekanto, 2019, *Faktor-Faktor yang Mempengaruhi Penegakan Hukum*, Rajawali Pers, Depok
- "Literature Review: Implementasi Aplikasi M-Paspor Dalam Mewujudkan Digitalisasi Pelayanan Publik", 2024, *Jurnal Niara*, Vol. 16, No. 3, 461–464.
- Dwi Cahyono, 2023, "Implementasi Pelayanan Paspor Berbasis Digital Melalui Aplikasi M-Paspor", *Jurnal Ilmiah Keimigrasian*, Vol. 6, No. 2.
- FA Wulandari, 2023, "Analisis Kualitas Pelayanan Pengurusan Paspor Melalui M-Paspor," *Jurnal Ilmu Administrasi Publik*, Vol. 5, No. 1, 33–41.
- I Made Surya Wijaya dan I Gusti Ayu Putu, 2024, "Efektivitas Pelaksanaan Aplikasi M-Paspor dalam Pelayanan Pengurusan Paspor", *Socio-political Communication and Policy Review*, Vol. 4, No. 1, 73–76.
- ME Virgiawan, 2024, "Analisis Kualitas Pelayanan Paspor," *Jurnal Manajemen Pelayanan Publik*, Vol. 8, No. 2, 55–63.
- MFN Fajri, 2023, "Implementasi Aplikasi M-Paspor dalam Kemudahan Pelayanan Pengajuan Paspor," *Jurnal Administrasi dan Inovasi Daerah (JAID)*, Vol. 3, No. 2, 45–52.
- ML Rindingpadang, 2025, "Pemanfaatan Teknologi Informasi dalam Pelayanan Publik," *Jurnal Teknologi dan Administrasi Publik*, Vol. 7, No. 1, 21–29.
- Nabila Azzahra dkk., 2025, "Implementasi Kebijakan Pelayanan Pembuatan Paspor Melalui Aplikasi M-Paspor Pada Kantor Imigrasi Kelas I TPI Pontianak", *Jurnal Ilmiah Publika*, Vol. 13, No. 2, 45–47.
- Natalia dan M. Ardiansyah, 2025, "Efektivitas Aplikasi M-Paspor bagi Masyarakat Kota Batam," *Jurnal Pengabdian dan Inovasi Masyarakat (JPIM)*, Vol. 4, No. 1, 67–75.
- Peraturan Menteri Hukum dan Hak Asasi Manusia Nomor 18 Tahun 2022 tentang Paspor Biasa dan Surat Perjalanan Laksana Paspor
- Tim Penulis, 2024, "Strategi Peningkatan Pelayanan Publik," *Jurnal Kebijakan Publik Universitas Islam Riau (UIR)*, Vol. 9, No. 1, 12–20.
- Undang-Undang Dasar Negara Republik Indonesia Tahun 1945
- Undang-Undang Nomor 25 Tahun 2009 tentang Pelayanan Publik (Lembaran Negara Republik Indonesia Tahun 2009 Nomor 112, Tambahan Lembaran Negara Republik Indonesia Nomor 5038).
- Undang-Undang Nomor 6 Tahun 2011 tentang Keimigrasian (Lembaran Negara Republik Indonesia Tahun 2011 Nomor 52, Tambahan Lembaran Negara Republik Indonesia Nomor 5216).
- V. Febriani, 2024, "Pelayanan Paspor melalui M-Paspor di Kantor Imigrasi," *Jurnal Ilmu Sosial dan Hukum*, Vol. 6, No. 1, 40–48.