

Reconstruction of Constitutional Responsibility in Financing Primary Education in Indonesia

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Abstract

This study examines the reconstruction of the State's constitutional responsibility in financing primary education in Indonesia following Constitutional Court Decision No. 3/PUU-XXII/2024. The ruling corrected the narrow interpretation of Article 34(2) of Law No. 20 of 2003 on the National Education System (Sisdiknas Law), which had limited free education to public schools and caused discrimination against students in private schools. Using a normative juridical method with statutory and conceptual approaches, the study analyzes two issues: the Court's reasoning in expanding the meaning of "free primary education" to include private schools, and the constitutional implications of the decision for realizing the right to education. The findings show that the Court's decision rests on five key grounds: the constitutional guarantee of primary education under Article 31(2) of the 1945 Constitution; misinterpretation of the Sisdiknas Law conflicting with justice; the strategic role of private schools; the principles of non-discrimination and equality before the law; and consistency with Article 13 of the ICESCR. The decision strengthens equitable access to education, expands State funding to private schools, and redefines the State's role as the guarantor of every citizen's constitutional right to education.

Keyword: Financing; Primary Education; Constitutional Court

INTRODUCTION

Education has long been regarded as a *magic word*—a key concept believed to be capable of bringing about significant changes in a nation's civilization. Through education, ignorance can be countered, foolishness can be overcome, and various national problems can be addressed. Education is able to shape human beings in a holistic manner, as it essentially functions as a

process of raising awareness so that individuals can better understand the realities of daily life. Ki Hadjar Dewantara described education as an effort to guide all the basic potential possessed by children, both as individuals and as members of society (Hutagalung & Andriany, 2024).

A country with a quality education system tends to have superior human resources (HR) (Nziadam & Amadioha, 2025). Superior HR is

not only characterized by intellectual competence, but also by the ability to think critically, uphold moral integrity, and adapt to change. Such qualified human resources subsequently serve as the driving force of development, progress, and global competitiveness of a nation (Yu & Liu, 2025). In other words, national advancement is highly dependent on the success of its education system in producing future generations.

In creating superior human resources, education should not merely function as a means of transferring knowledge but also as a medium for the “liberation of the mind.” This idea was emphasized by Paulo Freire, a Brazilian philosopher, who argued that education must serve as a practice of liberation—a process that frees the mind from domination and awakens critical consciousness (Cortina & Winter, 2021). Liberating education rejects the “banking model,” which positions students as passive receptacles of knowledge delivered by teachers. Instead, Freire proposed dialogical education, where teachers and students engage in mutual learning and co-create knowledge collectively. Through this approach, education does not merely produce intellectually capable individuals, but also individuals with the courage to question social realities and actively participate in societal transformation (Hoopes, 2024).

The importance of education as the fundamental basis of national progress has also been affirmed by various world figures. Nelson Mandela, for instance, declared that “Education is the most powerful weapon which you can use to change the world” (Singh, 2025). This statement underscores the transformative power of education in shaping society. In modern history, Emperor Hirohito of Japan, following the devastation of World War II, asked, “How many teachers are left?” (Singh, 2025), a symbolic reminder of the centrality of education and educators in rebuilding a shattered civilization.

In Indonesia, the founding fathers fully recognized the essential role of education as a *conditio sine qua non* for national progress. Consequently, attention to education was not only placed on a moral level as an ethical obligation but was also enshrined constitutionally as an integral part of state objectives. This is evident in the fourth paragraph of the Preamble of the 1945 Constitution, which declares that one of the purposes of government is “to educate the life of the nation.” This objective is reaffirmed in Article 31 (1) and (2) of the 1945 Constitution, which stipulates that every citizen has the right to education (Yuliatin, 2023), and that the state is obliged to allocate at least 20% of the national and regional budgets for the fulfillment of educational needs (Sulasmi et al., 2023).

To implement this constitutional mandate, the state enacted Law No. 20 of 2003 concerning the National Education System (the Sisdiknas Law) as the principal legal framework governing the administration of education. Article 1(1) defines education as a conscious and deliberate effort to create a learning environment and process that enables students to optimally develop their potential. Furthermore, Article 1(11) stipulates that formal education in Indonesia consists of several levels, including primary, secondary, and higher education (Ariza, 2023).

Primary education constitutes the first level within the national education system. According to Article 17 of the Sisdiknas Law, primary education serves as the foundation for secondary education and includes elementary schools (*Sekolah Dasar* or SD) and Islamic elementary schools (*Madrasah Ibtidaiyah* or MI), as well as junior high schools (*Sekolah Menengah Pertama* or SMP) and Islamic junior high schools (*Madrasah Tsanawiyah* or MTs), along with other equivalent educational units. Based on this legal construction, primary education can be concluded to be the fundamental stage for shaping students’ knowledge and character, and therefore its implementation must be optimized.

In practice, the administration of primary education in Indonesia is not only the responsibility of the government through public schools, but also involves the active participation of private institutions, such as foundations and religious organizations. The existence of private schools plays a strategic role in meeting educational needs, particularly in areas where public schools have limited capacity. However, despite their vital contribution, the fulfillment of the right to education in private schools continues to face serious challenges, especially in terms of financing (Muvid, 2022).

One of the fundamental issues is the disparity in access to educational funding between public and private schools. Public schools are fully financed by the state, whereas private schools do not receive the same treatment. As a result, private primary schools remain dependent on independent funding sources, primarily through student tuition fees (Shaturaev, 2021). This disparity arises from a narrow interpretation of Article 34(2) of the Sisdiknas Law, which states: “The government and regional governments shall guarantee the implementation of compulsory education at least at the primary level without charging fees.” The government tends to interpret this obligation as applying solely to public schools. Consequently, the responsibility for financing primary education in private schools is no longer regarded as a full state obligation.

Such a narrow interpretation of education financing creates significant disparities in the fulfillment of the right to fair and equitable access to primary education for all citizens. This situation prompted the submission of a judicial review of Article 34(2) of the Sisdiknas Law to the Constitutional Court, filed by the Indonesian Education Monitoring Network (*Jaringan Pemantau Pendidikan Indonesia* or JPPI) along with several other parties, as set out in Case No. 3/PUU-XXII/2024. In their petition, the applicants essentially demanded a reinterpretation of the provision so that the

guarantee of free education would not be discriminatory and could be equally accessible to all citizens, regardless of the type of school available in their respective regions.

In Decision No. 3/PUU-XXII/2024, the Constitutional Court granted the petition and declared that Article 34(2) of the Sisdiknas Law has no binding legal force unless interpreted to mean: “The government and regional governments shall guarantee the implementation of compulsory education at least at the primary level without charging fees, both for educational units organized by the government and for those organized by the community.” In doing so, the Court broadened and reinforced the constitutional interpretation that the state’s obligation to finance the right to primary education also extends to private educational institutions.

This ruling represents a landmark development in Indonesian education law. On one hand, it strengthens the principle of constitutional justice in fulfilling the right to primary education; on the other hand, it compels a conceptual reconstruction of the state’s responsibility to ensure access to primary education for all citizens. Such reconstruction is essential so that primary education funding policies are more equitable and reflect the principle of non-discrimination, in accordance with the constitutional mandate of Article 31 of the 1945 Constitution. In other words, the state is obliged to ensure that every child—whether enrolled in public or private schools—has access to adequate primary education free from financial barriers.

Based on this background, this study will focus on two central issues: First, what are the Constitutional Court’s legal considerations in Decision No. 3/PUU-XXII/2024 regarding the judicial review of Article 34(2) of the National Education System Law? Second, what are the constitutional implications of Decision No. 3/PUU-XXII/2024 for the fulfillment of citizens’ right to primary education?

RESEARCH METHOD

This study employs a normative juridical method, selected for its suitability with the focus of the issues under examination. The analytical approaches used are the statute approach and the conceptual approach. The legal materials in this research constitute secondary data, consisting of primary and secondary legal materials. The primary legal materials include statutory regulations, namely the 1945 Constitution of the Republic of Indonesia, Law Number 20 of 2003 concerning the National Education System (Sisdiknas Law), and a judicial decision, namely the Constitutional Court Decision Number 5/PUU-XXII/2024. Meanwhile, the secondary legal materials comprise books, scholarly journal articles, and other relevant literature. All legal materials were collected through document and library research and subsequently analyzed descriptively. The conclusions were then drawn using deductive reasoning.

RESULTS AND DISCUSSION

The Constitutional Court's Considerations in Decision No. 3/PUU-XXII/2024

In judicial practice, one of the essential aspects that must be comprehensively elaborated in a court decision is the judges' considerations. This requirement is stipulated in Article 53 paragraph (2) of Law No. 48 of 2009 on Judicial Power, which affirms that "court rulings and determinations must contain the judges' legal reasoning based on appropriate and accurate grounds and legal bases." The purpose of this provision is none other than to ensure transparency, accountability, and legal certainty in every court decision, thereby enabling the public to understand the underlying rationale employed by judges in adjudicating a case. Ideally, judicial considerations should not be confined merely to the juridical aspects or the "text of the norms," but must also encompass philosophical and sociological dimensions (Rayfindratama, 2023).

The Constitutional Court's Decision No. 3/PUU-XXII/2024, which granted the petition for judicial review and ruled that Article 34 paragraph (2) of the National Education System Law (Sisdiknas Law) conditionally lacks binding legal force unless interpreted as stating that "the Government and Regional Governments shall guarantee the implementation of compulsory education at least at the primary education level free of charge, both for state-run and community-run primary education institutions," also contains a number of considerations. In its decision, the Constitutional Court elaborated the grounds underlying its ruling, which include the following:

First, the Constitutional Right to Primary Education. The Constitutional Court emphasized that Article 31 paragraph (2) of the 1945 Constitution explicitly guarantees "the right of every citizen to primary education, and the State is obliged to finance it." This constitutional provision contains two dimensions: (1) primary education is compulsory for every citizen; and (2) the State is obliged to finance its implementation. The State's obligation in this respect extends beyond the mere provision of primary education; it also includes ensuring equitable access for all citizens without exception.

The obligation regarding primary education, as mandated by Article 31 paragraph (2) of the 1945 Constitution, is binding upon every citizen to attend primary education, and upon the government to finance it. Without the government's fulfilment of its financing obligation, citizens' ability to carry out their constitutional duty to attend primary education could be impeded. Hence, the government cannot evade or transfer its financial responsibility for the provision of primary education, as such responsibility is explicitly enshrined in the Constitution.

Furthermore, the Constitutional Court emphasized that the financing and provision of

primary education by the government is imperative to enable citizens to fulfill their constitutional obligation to attend primary education. In this regard, Article 31 paragraph (2) of the 1945 Constitution must be construed as encompassing primary education provided both by the government (public schools) and by the community (private schools).

Second, the Distortion in the Interpretation of Article 34 paragraph (2) of the Sisdiknas Law. This provision states that “the Government and Regional Governments shall guarantee the implementation of compulsory education at least at the primary education level free of charge.” According to the Court, the phrase “primary education” in this provision must be interpreted as referring to both public and private institutions. However, in practice, the Government has tended to interpret it narrowly, applying it exclusively to public schools. Such an interpretation fosters policy discrimination and constitutes a violation of the right to education.

The Court also noted that the phrase “compulsory education at least at the primary education level free of charge” in Article 34 paragraph (2) of Law No. 20 of 2003, which in practice applies only to public schools, has resulted in unequal access to primary education for students compelled to attend private schools or madrasahs due to the limited capacity of public schools. In the Court’s view, the State nonetheless bears a constitutional obligation to ensure that no student is hindered from obtaining primary education merely due to economic constraints or limited educational facilities. Consequently, the phrase “free of charge” is considered potentially discriminatory against students unable to secure places in public schools, who are compelled instead to attend private institutions at greater financial cost.

Third, the Strategic Role of Private Schools. The Court acknowledged that many Indonesian children access primary education through private schools due to the limited capacity of

public schools. Accordingly, the State remains obliged to safeguard their right to education through equitable financing. For instance, in the 2023/2024 academic year, public elementary schools accommodated 970,145 students, while private schools accommodated 173,265 students (Kemendikbudristek, 2024a). At the junior high school level, public schools accommodated 245,977 students, compared to 104,525 in private schools (Kemendikbudristek, 2024b). These figures illustrate that, despite the State’s efforts to fulfill its obligation to provide free primary education through government-run institutions, significant gaps persist that leave many students reliant on private schools or madrasahs. Consequently, many citizens fulfilling their constitutional obligation to attend primary education must do so in private institutions, incurring substantial costs, which contradicts the constitutional mandate of Article 31 paragraph (2) of the 1945 Constitution. The constitutional norm does not limit or distinguish which types of primary education the State must finance. It categorically obliges the State to finance primary education to ensure that citizens can fulfill their duty to attend it.

Fourth, the Principles of Social Justice and Non-Discrimination. The Court unequivocally stated that disparate treatment of students based on the status of their schools—public or private—contradicts the principle of social justice. Every child, regardless of their school affiliation, holds the same right to quality and affordable primary education. The State, as the guarantor of constitutional rights, cannot prioritize financial assistance solely for public institutions, as this undermines the principles of equity and justice. The Constitution does not differentiate educational institutions as a prerequisite for the State’s obligation. Therefore, the State is duty-bound to guarantee the fulfilment of educational rights without discrimination based on institutional status.

Fifth, International Standards. In its decision, the Court referred to Article 13 of the International Covenant on Economic, Social and

Cultural Rights (ICESCR), ratified through Law No. 11 of 2005. This provision stipulates that everyone has the right to education and that primary education shall be compulsory and available free to all. The Court's reliance on international standards highlights that the State's obligation to provide free primary education is a universal norm that must be respected and implemented. By aligning its reasoning with international standards, the Court reinforced its argument that access to education must not be constrained by institutional status. Indonesia, as part of the global community, is bound by its commitment to guarantee equitable, non-discriminatory, and free access to education for all children.

The Impact of Constitutional Court Decision No. 3/PUU-XXII/2024 on the Right to Primary Education

The Constitutional Court is one of the highest institutions within the Indonesian constitutional system, belonging to the judicial branch of power. Its existence is intended to perform the function of checks and balances against other branches of power, particularly in ensuring that every practice of state administration operates in accordance with constitutional principles (Hariri & Arifin, 2025). In this capacity, the Constitutional Court acts as the guardian and protector of the Constitution, namely by ensuring that every action and policy of state institutions remains within constitutional boundaries (Pujayanti et al., 2024).

Referring to the provisions of Article 24C paragraph (1) of the 1945 Constitution, the Constitutional Court possesses four main authorities. One of the most strategic authorities is the judicial review of laws against the Constitution, which serves as an essential instrument in safeguarding constitutional supremacy and protecting citizens' constitutional rights. In this context, there are two types of judicial review that may be carried out by the Constitutional Court, namely formal review (*formale toetsingsrecht*) and material

review (*materiele toetsingsrecht*) (Rishan, 2021).

In practice, formal review is conducted by assessing whether the process of law-making has complied with the procedures and mechanisms determined by the 1945 Constitution and its derivative legislation (de Villiers et al., 2024). At this stage, the Constitutional Court refers to the provisions of Article 5 paragraph (2), Article 20, Article 22A, and Article 22D of the 1945 Constitution, which regulate the mechanism for law-making. If in a formal review the Constitutional Court finds that the process of law-making has deviated from constitutional provisions, then the entire content of the law may be declared as having no binding legal force. In other words, even if the material content of the law itself is not problematic, if the political process of its formation contravenes the principles and norms of the Constitution, the law may still be annulled.

In contrast, material review focuses on the substance or provisions of the law being reviewed, by assessing whether such content contradicts the provisions of the 1945 Constitution ((de Villiers et al., 2024). If the Constitutional Court finds a contradiction, then only the particular provisions or articles that are reviewed and found unconstitutional are annulled. Conversely, if no contradiction is found, the Constitutional Court will reject the petition for review and declare that the provision remains valid and binding.

In every judicial review of constitutionality, Constitutional Court decisions are final and generally binding (*erga omnes*). The final nature means that such decisions cannot be subjected to further legal remedies such as appeal, cassation, or judicial review (*peninjauan kembali*), and they acquire legal force immediately upon being pronounced in an open court session. Meanwhile, the *erga omnes* nature indicates that the decision binds not only the parties directly involved in the case, but also all citizens, state

institutions, and legal entities (Lesmana et al., 2022).

Thus, every Constitutional Court decision has a broad impact on the national legal system and the overall constitutional life of the state. Through this authority, the Constitutional Court is expected to fulfill its role as guardian of the Constitution, ensuring that governance is carried out in accordance with constitutional values, while at the same time guaranteeing and protecting citizens' fundamental rights.

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First, Strengthening the Principle of Non-Discrimination. The Constitutional Court clarified that the State is prohibited from differentiating the provision of primary education services based on the status of educational institutions. This reinforces the principle of non-discrimination stipulated in Article 28I paragraph (2) and equality before the law as guaranteed in Articles 27 and 28D paragraph (1) (Ibrahim, 2022). In this regard, children enrolled in private schools possess the same right to receive state-guaranteed and state-financed primary education as those enrolled in public schools. The State must not draw discriminatory distinctions merely on the basis of institutional status, since the right to education is a constitutional right inherent in every individual without exception. This decision constitutes a progressive step toward eliminating discriminatory practices that have persisted in national education policies and implementation, while affirming that inclusive and equal primary education is a non-transferable responsibility of the State.

Second, Expansion of Access to Education.

The Constitutional Court's ruling obliging the State to also finance primary education in private schools has significant implications for expanding access to education, especially for children from underprivileged families. Previously, the limited capacity of public schools often posed barriers for the poor in accessing proper primary education. With the constitutional recognition that the State is also responsible for financing education in private schools, economic barriers that previously hindered educational access can be reduced. This policy has the potential to increase the gross enrollment rate (GER) and net enrollment rate (NER) of primary education, reduce dropout rates, and narrow educational disparities between regions. Beyond this, it constitutes a strategic measure to accelerate the achievement of the Sustainable Development Goals (SDGs), particularly Goal 4, which targets inclusive, equitable, and quality education for all (Ferrer-Estévez & Chalmeta, 2021). Thus, the State not only fulfills its constitutional obligations but also demonstrates a concrete commitment to promoting social justice and sustainable human development.

Third, A Paradigm Shift in the Role of the State.

Prior to this Constitutional Court decision, the State tended to narrowly position itself as the provider of formal education services, primarily through public institutions. Consequently, private educational institutions were often viewed as complementary or secondary alternatives not fully encompassed within the State's responsibility, especially in terms of financing. However, with the expanded constitutional obligation for the State to finance primary education in private schools, a significant shift has occurred in the State's paradigm. The State is no longer merely an administrator of educational services but also a guarantor of every citizen's right to obtain proper primary education, without discrimination based on institutional status. This change reflects a shift from an administrative approach to a rights-based approach, whereby

the State is obliged to guarantee access to and the quality of education comprehensively. This approach aligns with the principles of the welfare state, in which the State is not passive or neutral but actively ensures the fulfillment of citizens' fundamental rights (Marshall, 1961), including the right to education. Thus, this decision not only affects the technical aspects of education policy but also reflects a reorientation of the State's role within the framework of modern constitutional law toward greater inclusivity and justice.

Fourth, Reform of Education Budget Policy.

This Constitutional Court decision necessitates a fundamental reform in education sector planning and budgeting, both at the national and regional levels. The State's constitutional obligation to finance primary education in private schools requires the government to design more inclusive budgetary policies. An affirmative approach is needed to recognize the strategic role of private schools as partners of the State in providing education services, particularly in areas where public school infrastructure is limited. Future budget allocations must be conducted proportionally and based on need (*need-based budgeting*), rather than solely on institutional status. This principle is crucial to ensure that educational resources are genuinely allocated to students in need, regardless of where they are enrolled. In this way, the efficiency and effectiveness of budget use can be more measurable and oriented toward substantive justice. Furthermore, this Constitutional Court decision provides a normative foundation for evaluating and revising various technical regulations at the ministerial and regional levels, which have often neglected or excluded financing for private schools. Implementing regulations such as Ministerial Regulations and Regional Regulations must be aligned with the constitutional principles affirmed in the decision. Such regulatory harmonization is critical to ensure that the implementation of the Constitutional Court's decision proceeds

effectively and is not hindered by overlapping or inconsistent policies at the operational level.

Constitutional Court Decision No. 3/PUU-XXII/2024 represents a landmark in Indonesia's constitutional history, particularly in the context of realizing equal rights to education. The decision not only reaffirms the State's obligation to guarantee access to primary education for all citizens but also eliminates unequal treatment between public and private educational institutions. Historically, disparities in the financing of private schools have often resulted in covert discrimination contrary to the principle of social justice. Through this decision, the Constitutional Court affirmed that the State cannot differentiate its responsibilities based solely on the status of educational institutions, as the right to primary education is a constitutional right inherent in every citizen without exception. Accordingly, this decision strengthens the legal foundation for building an inclusive, equitable, and non-discriminatory primary education system, consistent with the mandate of Article 31 of the 1945 Constitution and the principles of human rights.

CONCLUSION

Based on the analysis above, it can be concluded that the Constitutional Court's legal reasoning in Decision No. 3/PUU-XXII/2024 rests on five key arguments. First, the constitutional mandate of Article 31(2) of the 1945 Constitution, which obliges the State to finance primary education without distinction between types of educational institutions. Second, the correction of a long-standing distortion and discriminatory misinterpretation of Article 34(2) of the National Education System Law (Sisdiknas Law). Third, the recognition of the strategic role of private schools in accommodating students. Fourth, the affirmation of the principles of social justice and non-discrimination, which had been violated by previous policies. Fifth, the alignment with international legal standards under Article 13 of the International Covenant on Economic, Social and Cultural Rights

(ICESCR), which mandates free primary education for all.

Regarding the constitutional implications of the decision, it can be understood that this ruling has profound effects on the fulfillment of citizens' rights. Its primary implications include the reinforcement of the non-discrimination principle and the expansion of educational access for underprivileged communities. The decision also compels a paradigm shift in the State's role—from merely a provider of educational services to an active guarantor of citizens' constitutional rights—necessitating inclusive reforms in education policy and budget allocation. Thus, this ruling serves as a strong legal foundation for building a more equitable primary education system and ensuring that no form of discrimination based on the type of school persists.

REFERENCES

- Ariza, H. (2023). Lembaga Pendidikan Islam Dalam Lintasan Sejarah di Indonesia (Kajian Historis Perkembangan Lembaga Pendidikan Islam). *SURAU: Journal of Islamic Education*, 1(1), 1. <https://doi.org/10.30983/v1i1.6697>
- Cortina, R., & Winter, M. (2021). Paulo Freire's Pedagogy of Liberation. *Current Issues in Comparative Education (CICE)*, 23(2), 8–19. <https://doi.org/https://doi.org/10.52214/cice.v23i2.8577>
- De Villiers, B., Isra, S., & Faiz, P. M. (2024). Courts and Diversity: Twenty Years of the Constitutional Court of Indonesia. Brill.
- Ferrer-Estévez, M., & Chalmata, R. (2021). Integrating Sustainable Development Goals in educational institutions. *International Journal of Management Education*, 19(2), 100494. <https://doi.org/10.1016/j.ijme.2021.100494>
- Hariri, A., & Arifin, S. (2025). Analysis and Challenges of Unimplemented Constitutional Court Decisions by Legislators. *Indonesia Law Reform Journal*, 5(1), 1–24. <https://doi.org/https://doi.org/10.22219/ilrej.v5i1.38332>
- Hoopes, A. (2024). How might Apple, Freire, and hooks Redesign the Modern School as a Site for Social Transformation? *Interactions: UCLA Journal of Education and Information Studies*, 19(1), 1–12. <https://doi.org/10.5070/D41.19440>
- Hutagalung, T. B., & Andriany, L. (2024). Filosofi Pendidikan yang Diusung oleh Ki Hadjar Dewantara dan Evolusi Pendidikan di Indonesia. *Morfologi: Jurnal Ilmu Pendidikan, Bahasa, Sastra Dan Budaya*, 2(3), 91–99. <https://doi.org/10.61132/morfologi.v2i3.615>
- Ibrahim, M. (2022). The judicialisation of discrimination in the Indonesian constitutional court. *International Journal of Discrimination and the Law*, 22(2), 125–151. <https://doi.org/https://doi.org/10.1177/13582291221094923>
- Kemendikbudristek. (2024a). *Statistik Sekolah Dasar (SD) Tahun 2023/2024*. Pusat Data dan Teknologi Informasi (Pusdatin).
- Kemendikbudristek. (2024b). *Statistik Sekolah Menengah Pertama (SMP) Tahun 2023/2024*. Pusat Data dan Teknologi Informasi (Pusdatin).
- Lesmana, I., Ardiansah, A., & Azmi, B. (2022). The Final Power of the Decision of the Constitutional Court in Indonesian Positive Law. *Budapest International Research and Critics Institute-Journal (BIRCI-Journal)*, 5(1), 1765–1775. <https://doi.org/https://doi.org/10.33258/birci.v5i1.37791765>
- Marshall, T. H. (1961). The Welfare State: A Sociological Interpretation. *European Journal of Sociology*, 2(2), 284–300. <https://doi.org/10.1017/S0003975600000448>
- Muvid, M. B. (2022). Konsep Pemerataan Pembangunan Pendidikan Nasional Sebagai Alternatif Kemajuan Pendidikan Indonesia. *Widya Balina*, 7(2), 469–476. <https://doi.org/10.53958/wb.v7i2.153>
- Nziadam, L., & Amadioha, A. (2025). Quality Education and National Development: The Nexus. *J Adv Educ Philos*, 9(3), 114–121. <https://doi.org/https://doi.org/10.36348/jaep.2025.v09i03.003>
- Pujayanti, L. P. V. A., Nugrahayu, Z. Z., Rahim, E. I., Muhtar, M. H., & Yassine, C. (2024). Indonesia's Constitutional Court: Bastion of law enforcement and protector of human rights in the reform era. *Jurnal Pamator: Jurnal Ilmiah Universitas Trunojoyo*, 17(1), 35–49. <https://journal.trunojoyo.ac.id/pamator/articl>

- e/view/24128
- Rayfindratama, A. D. (2023). Kebebasan Hakim dalam menjatuhkan putusan di Pengadilan. *Birokrasi: Jurnal Ilmu Hukum Dan Tata Negara*, 1(2), 1-17. <https://doi.org/10.55606/birokrasi.v1i2.409>
- Rishan, I. (2021). Konsep Pengujian Formil Undang-Undang di Mahkamah Konstitusi. *Jurnal Konstitusi*, 18(1), 001–021. <https://doi.org/10.31078/jk1811>
- Shaturaev, J. (2021). 2045: Path to nation's golden age (Indonesia Policies and Management of Education). "*Science and Education*" *Scientific Journal*, 2(12), 866–875. <https://orcid.org/0000-0003-3859-2526>
- Singh, D. (2025). Education is the Most Powerful Weapon Which You Can Use to Change the World: A Comprehensive Analysis. *Shodh Prakashan: Journal of Educational Research & Training*, 1(1), 23–28.
- Sulasmi, E., Prasetya, I., & Rahman, A. A. (2023). Government Policy Regarding Education Budget on The Posture of The State Budget (APBN). *Journal for Lesson and Learning Studies*, 6(1), 142–151. <https://doi.org/https://doi.org/10.23887/jlls.v6i1.60171>
- Yu, L., & Liu, Y. (2025). Education levels and high-quality economic development. *Finance Research Letters*, 80. <https://doi.org/https://doi.org/10.1016/j.frl.2025.107228>
- Yuliatin, Y. (2023). Legal Problems of Law No 20 of 2003 Concerning the National Education System, Indonesia. *Path of Science*, 9(8), 4016–4022. <https://doi.org/10.22178/pos.95-23>