

Organizing the Formation of the Presidential Cabinet in Indonesia: A Comparative Analysis with the United States, the Philippines, Argentina, and South Africa

M. Yasin Al Arif * 

Faculty of Syariah, Universitas Islam Negeri Raden Intan Lampung, Indonesia

ABSTRACT

The formation of a cabinet is a central element in the presidential system for creating impactful governance that directly affects the effectiveness and efficiency of public policies. This study focuses on comparing the mechanisms and dynamics of cabinet formation in the United States, the Philippines, Argentina, and South Africa, as well as analysing its potential application in the Indonesian context. The research questions posed are: how are cabinets formed in the United States, the Philippines, Argentina, and South Africa, and how does this comparative analysis relate to the future structuring of the Indonesian cabinet? This study adopts a normative juridical research methodology. The approaches used include the statute approach, comparative approach, and conceptual approach, utilising secondary data comprising primary, secondary, and tertiary legal materials. The research findings conclude that various cabinet formation models in the United States, the Philippines, Argentina, and South Africa show significant variations in appointment mechanisms, accountability, transparency, and meritocracy. Despite differences in legal and political contexts, fundamental principles such as accountability and transparency are essentially the cornerstones of the cabinet formation systems of these nations. Through this study, suggestions for the future improvement of the Indonesian cabinet formation are proposed, such as the adoption of the American "Confirmation Hearing" model or the Philippine "Commission of Appointment", the South African Post-Appointment Oversight Mechanism, Maintaining Political Balance and Meritocracy, Making the Process More Participative, Strengthening Sustainability Policies, Coalition Transparency, and Periodic Audits and Evaluations.

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Introduction

The formation of a cabinet is a crucial stage in the presidential governance system. This process acts as a bridge between political desires and policy implementation (Syaputra, 2020). If the formed cabinet is not proportionate, it could potentially threaten governmental stability. Whether a Cabinet is proportionate or not largely depends on the mechanism of its formation.

CONTACT M. Yasin Al Arif  myasinalarif@radenintan.ac.id

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Theoretically, in a presidential system, the formation of the cabinet is the president's right to decide who will hold ministerial positions as aides in government execution. This is because the president, besides being the head of state, is also the head of government. In this context, within the Indonesian constitution (UUD 1945), Article 4 paragraph (1) states that the President is the head of government, and in Article 17, the authority to select ministers is granted (Wijayanti & Iswandi, 2021).

The cabinet formation during President Joko Widodo's tenure has shown several dynamics, including but not limited to the involvement of political parties (Setiawan, 2022), the precise selection of ministers from professional sectors, and the role of oligarchy and other political forces. However, the recurring issues are policy fluctuations due to ministerial changes, weak accountability mechanisms, and potential collusion, corruption, and nepotism. A selection process that's often more political than meritocratic has raised questions about the cabinet's effectiveness and efficiency.

Issues regarding cabinet reshuffles during Joko Widodo's second term have seen ministerial changes in some significant positions, such as the Minister of Social Affairs and the Minister of Maritime Affairs and Fisheries, due to various problems, including legal issues (*BBC News Indonesia*, 2020). Changes in the ministry certainly affect the continuity of policies. Moreover, the absence of clear benchmarks for ministerial performance contributes to weak performance accountability.

Besides, while the reality of coalitions in Indonesia cannot be denied, the composition of representation in cabinet formation needs attention. Often, the cabinet composition is more based on political interests than meritocracy (Efriza, 2019). This results in suboptimal performance quality in some cases. This is evident in some ministers of the Jokowi-Ma'ruf cabinet who were engulfed in corruption scandals, for instance, Johnny Gerard Plate from the Nasdem Party, Idrus Marham from Golkar, Imam Nahrawi from PKB, Edhy Prabowo from the Gerindra Party, and Juliari Peter Batubara (Media, 2023).

Meanwhile, countries with presidential systems like the United States, the Philippines, Argentina, and South Africa offer various models in their cabinet formation arrangements. Ranging from the "spoils system" policy in the United States, the political patronage system in the Philippines, the political cohabitation model in Argentina, and policy continuity in South Africa.

Considering the complexity and urgency of this matter, this research aims to analyse and compare the process and mechanism of presidential cabinet formation in Indonesia with those of those four countries. Studies on presidentialism and cabinet formation in Indonesia have been extensively conducted by several researchers, including Nfn Efriza, (Efriza, 2019) Yusrizal Adi Saputra, (Syaputra, 2020) Reja Pahlevi and Darul Huda Mustaqim, (Fahlevi & Mustaqim, 2020) Anfri Yanto and Harry Setya Nugraha, (Yanto & Nugraha, 2021) Septi Nur Wijayanti, (Wijayanti & Iswandi, 2021) dan Isnawati dkk. (Isnawati dkk., 2023) Unlike previous studies, this research compares presidential cabinet formation in Indonesia with the four aforementioned countries. Through this comparative study, the hope is to understand the strengths and weaknesses of various cabinet formation models and formulate recommendations to enhance the effectiveness and accountability of Indonesia's governance system.

Based on the aforementioned background, the issues to be examined are: How is the cabinet formed in the United States, the Philippines, Argentina, and South Africa, and how does this comparative analysis relate to the future structuring of the cabinet in Indonesia?

Research Method

This research adopts a normative juridical approach. The methodologies used include the statute approach, the comparative approach, and the conceptual approach. A comparative approach is conducted concerning the cabinet formation in four countries, namely the United States, the Philippines, Argentina, and South Africa. These four countries were chosen based on three aspects: (1) All the above countries utilise a presidential system with the President acting as both the head of state and the head of government; (2) countries with a presidential system face a multi-party system; even though in America, there are two dominant parties (Democrats and Republicans), there are also smaller parties and independents that can influence political dynamics; and (3) they possess similar complexities in determining the cabinet. The data used in this research is secondary data. The materials used in this research comprise primary, secondary, and tertiary legal sources.

Discussion

1. Cabinet Formation in Four Countries

A. United States

The formation of the Cabinet in the United States is based on the American Constitution and its legislative regulations. According to the constitutional-legal framework in the United States, the process of cabinet formation follows specific regulations and procedures outlined in the constitution and other related legislation. Article II, Section 2 of the US Constitution states, "And he (the president) shall nominate, and by and with the advice and consent of the Senate, shall appoint Ambassadors, other public ministers and consuls, judges of the Supreme Court, and all other officers of the United States, whose appointments are not herein otherwise provided for."

After the President submits his nominations, the Senate conducts a confirmation hearing to evaluate the qualifications and suitability of the candidates for the said positions. During these hearings, senators have the opportunity to question the candidates and gather additional information about their backgrounds and experiences.

According to the aforementioned provision, the mechanism for cabinet formation in the United States follows a clear and structured process. The President is responsible for selecting individuals to be members of the cabinet, who then must gain Senate approval.(Brunclík, 2016) The nomination and confirmation process ensures that the individuals appointed to the cabinet have the necessary qualifications and are suited for government positions (Yusingco dkk., 2023). After the President submits his nominations, the Senate conducts a confirmation hearing to evaluate the qualifications and suitability of the candidates for the said positions During these hearings, senators have the opportunity to question the candidates and gather additional information about their backgrounds and experiences (Carroll, 2016).

After the confirmation hearing, the Senate votes on whether to confirm the candidate. A majority vote is required for confirmation. Once confirmed, cabinet members assume their positions and begin their duties. The president's ability to independently appoint cabinet members in the United States is a hallmark of the presidential system (Chaisty & Chernykh, 2017). This allows the president to form a team consisting of individuals aligned with their policy vision and objectives. Moreover, the two-party system in the United States plays a significant role in cabinet formation.

Apart from the constitutional and legislative framework, cabinet formation in the United States is also influenced by the two-party system. Due to the dominance of the

two-party system in America, coalition cabinets are practically nonexistent (Chaisty & Power, 2019). Instead, presidents tend to appoint individuals from their party to cabinet positions. This ensures a cohesive and aligned approach to governance within the executive branch. The constitutional-legal framework in the United States provides specific provisions regarding cabinet formation, serving to uphold the principles of democracy, accountability, and transparency.

Historically, there have been two different approaches governing cabinet formation: the "spoils system" and the "merit system". In the 'spoils system' model, government positions become a kind of 'prize', distributed by election winners to their political supporters and allies. This approach certainly binds loyalty and ensures political cohesion, but it also opens the door to clientelism and, in some cases, raises concerns about incompetence. In contrast, the "merit system" prioritises expertise and technical skills over political loyalty. Although this reduces the risk of nepotism and corruption, this merit-based approach is sometimes criticised for lacking political or ideological representation. Over time, cabinet formation often becomes a combination of these two approaches, reflecting the complexity and various challenges faced by modern governance.

Furthermore, the "spoils system" and "merit system" approaches in cabinet formation also impact levels of accountability and regular evaluation mechanisms (Kaufman, 2001). For instance, in the "spoils system", assigning positions based on political support tends to raise accountability issues as political loyalty is sometimes prioritised over competence. Conversely, the "merit system" emphasises selection based on competence and qualifications, which, in theory, should enhance accountability levels.

Therefore, to ensure accountability, the US has several mechanisms to evaluate cabinet performance and other high-ranking officials. One of them is through Congressional Oversight, where Congress has the authority to conduct investigations, hold hearings, and monitor the implementation of government policies (James, 2002).

Hence, it's essential to understand that the cabinet formation system doesn't stand alone but is part of a larger ecosystem that includes accountability and evaluation mechanisms. In this regard, the United States offers valuable lessons on balancing political needs and accountability demands in its governance system.

B. Philippine

The Philippines' governmental system, structurally, adopts a presidential model that separates executive, legislative, and judicial powers. However, in practice, it experiences a broad range of variations, including in cabinet formation.

According to the 1987 Philippine Constitution, Article VII, Section 16, the President has the authority to appoint cabinet members according to their needs and considerations. The President is free to choose anyone deemed competent and capable, considering that the candidate meets the minimum criteria established by law. Additionally, the Philippines has a 'Commission on Appointments', a body that reviews and approves the president's appointments. Adding a layer of accountability and transparency to the selection process.

This Commission is a legislative body comprising senators and members of the House of Representatives. It's governed by Article VI, Section 18, of the 1987 Philippine Constitution. Its duty is to confirm or reject the president's appointments. All appointments made by the President are forwarded to the Commission on Appointments

for review. They check the qualifications and background of the appointment and can request testimonials from relevant parties. If a candidate is deemed to meet the criteria, the Commission will give its approval.

The Commission on Appointments typically involves several stages, such as preliminary qualification checks, interviews, and Q&A sessions used to assess candidates' competence and integrity. This process is usually open and transparent, and its decisions become part of the public record.

However, in practice, cabinet formation in the Philippines is often influenced by political dynamics and patronage. The political patronage policy, known as "utang na loob" (debt of gratitude) (Ufen, 2012), often plays a significant role in determining who gets what position in the cabinet. Therefore, there's a tendency to appoint individuals who have close relationships or who have provided political support during the campaign.

Nevertheless, efforts are made to enhance meritocracy and accountability, including using more objective performance metrics and evaluations for cabinet members. For instance, several departments have adopted Key Performance Indicators (KPIs) to measure cabinet members' effectiveness and efficiency. Thus, the cabinet formation system in the Philippines is a combination of the constitutional discretion of the president and the local political realities, forming a complex mosaic of political loyalties, technical competencies, and administrative needs.

C. Argentina

The authority of the president to form a cabinet in Argentina is regulated in the 1853 Argentine Constitution, Article 99, paragraph (7). The Argentine Constitution grants the President discretion to appoint their cabinet members, with specific criteria and requirements set by the law. While the President holds the primary authority, there are additional mechanisms requiring Senate approval to evaluate the qualifications and integrity of ministerial candidates. This approval supports a transparent and accountable cabinet formation process.

This Senate approval occurs after the President chooses the names of ministerial candidates (Rose-Ackerman dkk., 2011). There, the candidates will be examined by relevant Senate committees, which can request additional information, conduct interviews, or even call candidates to give testimony or clarification. After this process, the committee will make recommendations to the full Senate, which then decides whether to give approval or not.

This process can be quick or slow, depending on several factors, including the extent of political consensus regarding the proposed candidates and the legislative urgency and priorities at the time. Moreover, while the Constitution provides the basic framework, the details of this process are often also governed by laws and the Senate's internal regulations.

Although Senate approval is deemed essential for accountability and legitimacy, the President typically has extensive discretion in choosing their cabinet members, especially if their political party or coalition has a majority in the Senate. This can make the approval process more of a formality than a substantive examination, depending on the political context.

Argentina's cabinet formation political dynamics experience what's called political cohabitation (Passarelli, 2020), where the President and the majority in Congress may

come from different parties. This phenomenon adds complexity to the cabinet formation process and often forces compromises between different political powers.

Therefore, cabinet reshuffles aren't uncommon in Argentina. In practice, patronage politics and personal relationships often play a significant role in cabinet formation and reshuffles. Ministerial selections often reflect compromises between various factions and coalitions in the ruling government or political party. Moreover, issues like popularity, media pressures, and public demonstrations can also influence cabinet reshuffle decisions (Martínez-Gallardo, 2012). To ensure policy continuity, certain mechanisms are adopted. This can include a careful transition from the outgoing minister and providing in-depth briefings to the new one about ongoing policies and programmes. Additionally, the role of bureaucracy and professionals in various departments is crucial to maintaining continuity.

Furthermore, to maintain accountability, ministers are typically monitored through legislative mechanisms like questions in parliament and through the media and public opinion. In addition to this, Argentina has mechanisms for periodic cabinet performance evaluations. This includes the use of performance indicators and audits by oversight bodies, adding a layer of accountability and transparency to governance.

D. South Africa

South Africa is a country with a presidential system where the president serves as the head of state and the head of government. This provision is enshrined in the 1996 South African Constitution, Article 83(a), which states, "The president is the head of state and head of the national executive." As head of government, the president is granted the authority to form a cabinet.

The formation of the cabinet in South Africa is strictly regulated in the South African Constitution, Article 91. This provision stipulates that the Cabinet consists of the President, the head of the Cabinet, the Deputy President, and the Ministers. The President appoints the Deputy President and Ministers, delegates powers and functions to them, and can dismiss them. Regarding its composition, the Constitution determines that the President (a) must choose the Deputy President from among the members of the National Assembly; (b) may choose several Ministers from among the Assembly members; and (c) may choose no more than two Ministers from outside the Assembly.

In practice, the South African President appoints cabinet members from their party or parties forming the government coalition. However, the president also has the discretion to appoint members from outside parliament, although this is rare. After the appointment, cabinet members are inaugurated and take the oath of office, binding them to perform their duties in accordance with the Constitution and other laws.

South Africa also practices a parliamentary rigidity system, where cabinet members are also members of parliament. This has implications for how cabinet members are selected and how they are held accountable. They must retain the confidence of the majority of the National Assembly members to remain in their positions, making the 'motion of no confidence' mechanism one of the tools for evaluating cabinet member performance. This parliamentary rigidity essentially serves as an accountability and responsibility mechanism outlined in the constitution.

Post-appointment oversight mechanisms for cabinet members are one of the key instruments for ensuring government accountability and integrity. Independent ethics and compliance committees serve as the implementers of this mechanism. The committee usually consists of experienced and integrous individuals from various

backgrounds, including academics, legal professionals, and community leaders. This diverse membership ensures a comprehensive and objective evaluation.

The committee is responsible for monitoring, evaluating, and reporting on the performance of ministers or other cabinet officials. This includes examinations of compliance with laws, ethics, and good governance standards.

2. Comparative Analysis of Cabinet Formation in Indonesia and Future Cabinet Arrangements

A. Presidential Cabinet Formation in Indonesia Under President Joko Widodo's Leadership

Indonesia is a country with a presidential system, as stipulated in the 1945 Constitution, Article 4 paragraph (1), which states that the President of the Republic of Indonesia holds government power according to the Constitution. As a consequence of this provision, the formation of the cabinet is the prerogative of the President (al-Arif, 2015). This is further elaborated in Article 17, paragraph (2), which states that ministers are appointed and dismissed by the President. Further regulations on this matter are governed by Law Number 39 of 2008 concerning State Ministries.

Based on the above provisions, the formation of the cabinet in Indonesia is the president's prerogative (Isnawati dkk., 2023). In practice, this authority is an absolute authority for the president to select and determine ministers who, based on his "own" judgement, are competent in their field. The reference is valid as long as the criteria determined do not conflict with regulations.

In the era of President Joko Widodo, the reality of cabinet formation reflects the prevailing political complexities. One interesting phenomenon is the presence of the 'Working Cabinet' in the first period and the 'Indonesia Moving Forward Cabinet' in the second period of his administration. Jokowi is known for innovating in choosing his cabinet members, which include figures from various backgrounds, including professionals, academics, former activists, and athletes. However, in forming his cabinet, several issues arose that needed attention:

1). Meritocracy vs Politics

The formation of Jokowi's "Indonesia Moving Forward Cabinet" shows political flexibility by including coalition party members who support him, although this often raises criticisms about the lack of meritocracy in the selection process. For example, in the second cabinet, there were controversial ministerial appointments whose credibility was questioned by the public and the media. The political flexibility of the formation of Jokowi's Indonesia Moving Forward Cabinet can be seen in the following table:

No	Name	Position	Background (Party/Non-Party)
1	Muhammad Mahfud MD	Coordinating Minister for Political, Legal, and Security Affairs	Non-Party
2	Airlangga Hartarto	Coordinating Minister for Economic Affairs	Golkar
3	Luhut Binsar Pandjaitan	Coordinating Minister for Maritime Affairs and Investment	Non-Party

4	Muhadjir Effendy	Coordinating Minister for Human Development and Culture	Non-Partai
5	Prabowo Subianto	Minister of Defense	Gerindra
6	Sri Mulyani Indrawati	Minister of Finance	Non-Party
7	Nadiem Makarim	Minister of Education, Culture, Research, and Technology	Non-Party
8	Tito Karnavian	Minister of Home Affairs	Non-Party
9	Retno Marsudi	Minister of Foreign Affairs	Non-Party
10	Fachrul Razi/Ya'qut Cholil Qoumas	Minister of Religious Affairs	Non-Party
11	Budi Karya Sumadi	Minister of Transportation	Non-Party
12	Edhy Prabowo	Minister of Maritime and Fisheries	Gerindra
13	Juliali Batubara/Tri Rismaharini	Minister of Social Affairs	PDIP
14	Basuki Hadimuljono	Minister of Public Works and People's Housing	Non-Party
15	Ida Fauziyah	Minister of Manpower	PKB
16	Terawan Agus Putranto	Minister of Health	Non-Party
17	Siti Nurbaya Bakar	Minister of Environment and Forestry	PDIP
18	Agus Suparmanto	Minister of Trade	PKB
19	Syahrul Yasin Limpo	Minister of Agriculture	NasDem
20	Arifin Tasrif	Minister of Energy and Mineral Resources	Non-Party
21	Tjahjo Kumolo	Minister of State Secretary	PDIP
22	Abdul Halim Iskandar	Minister of Village, Development of Disadvantaged Regions, and Transmigration	PKB
23	Johnny Gerard Plate	Minister of Communication and Information Technology	NasDem
24	Erick Thohir	Minister of State-Owned Enterprises	Non-Party

Source: Compiled from various sources

From the table, it is evident that the coalition party is given a significant portion of the cabinet. Although there are efforts to select individuals based on competence, the presence of several senior political figures and party leaders in the cabinet raises

questions about the extent to which meritocracy is applied. Moreover, pressure to maintain his political coalition often results in compromises, making meritocracy and politics seem to go hand in hand but often conflict.

2). Accountability

Despite Jokowi's reputation as a president closely connected to the people and responsive to various issues, accountability within the context of the cabinet remains less than fully transparent. There are instances where ministers are replaced without a clear explanation to the public, raising questions about the standards of accountability employed. The lack of information or justification for ministerial changes creates an information vacuum that can be filled by speculation and interpretation. This also prompts inquiries into the criteria and performance indicators used by the president in evaluating the performance of his ministers. Are decisions based on meritocracy and objective assessments of performance, or are they more influenced by political and coalition factors? Is there a transparent and accountable periodic evaluation mechanism?

Political coalitions also influence this dynamic. In the context of Jokowi's governance, many assess that the composition of the cabinet is influenced by considering the political strengths supporting it. This could pose a dilemma in maintaining the level of competence and accountability of ministers, especially if changes are made to meet the demands of coalition political parties rather than being based on merit or performance.

3). Rapid Rotation and Policy Continuity

In the era of Joko Widodo (Jokowi), the phenomenon of "rapid rotation" of ministers or the replacement of ministers within a relatively short period has become an intriguing topic. This rapid rotation indicates complex dynamics within the cabinet, influenced by various factors. (*Republika.co.id*, 2023)

One primary reason for rotation is the performance of the ministers themselves. In Jokowi's era, some ministers were replaced due to perceived shortcomings in fulfilling their duties and responsibilities. Additionally, ministerial changes are often considered a result of political pressure or to strengthen the coalition. This often becomes a double-edged sword, as it can undermine policy consistency (*Universitas Muhammadiyah Yogyakarta*, 2020).

Consequently, it affects policy continuity. A policy initiated by one minister may not receive the same focus under their successor. New ministers risk altering or even thwarting innovative policies designed by their predecessors in pursuit of short-term performance or to exhibit a 'new character.'

4). Transparency

An issue that requires attention in the formation of Jokowi's cabinet is related to transparency (Susanti, 2022). The issue of transparency in the formation of Jokowi's cabinet is highlighted due to the lack of openness regarding the selection and replacement of ministers.

The matter of transparency is also intertwined with the criteria for ministerial selection. It is not always clear why one candidate is chosen over another and what criteria are used in the selection process. Additionally, the reasons for ministerial replacements are not consistently explained to the public. This impacts the level of public trust in the decision-making process at the highest levels of government.

B. Comparative Analysis of Cabinet Formation in Indonesia with the US, Philippines, Argentina, and South Africa

Based on the realities of cabinet formation in the Jokowi era, which indicate the existence of the issues mentioned above, there are similarities with the dynamics of cabinet formation in the countries that have been discussed earlier. Therefore, the following is a comparative analysis with the previously mentioned countries regarding issues related to cabinet formation in Indonesia.

1). Meritocracy

In Indonesia, meritocracy often competes with political loyalty and the need to maintain coalitions. In the US, meritocracy is prioritised, focusing on expertise. In the Philippines, Argentina, and South Africa, meritocracy is present but mixed with local political dynamics.

2). Accountability

Accountability in cabinet formation in Indonesia is often questioned due to the lack of public explanations for ministerial changes. This contrasts with the US, where the Senate approval process provides a higher level of accountability.

3). Rapid Rotation

Indonesia and Argentina have records of rapid ministerial rotations, potentially disrupting policy continuity. In the US, cabinet stability is more maintained, while in the Philippines and South Africa, rotations occur, but for more transparent reasons.

4). Policy Continuity

Policy continuity in Indonesia can be disrupted by rapid rotations and a lack of transparency. In the US, continuity is ensured due to a structured process and Senate reviews. In Argentina, continuity can be affected by volatile politics (Surbakti et al., 2011). In Philippines and South Africa, sustainability often depends on the strength of the president and the coalition that supports him. Di Filipina dan Afrika Selatan, keberlanjutan seringkali bergantung pada kekuatan presiden dan koalisi yang mendukungnya.

5). Transparency

Indonesia needs improvements in cabinet formation transparency. In the US, the process is open and involves many stakeholders. The Philippines and Argentina also have transparency due to legislative control, while in South Africa, the process depends on internal party dynamics.

In conclusion, comparing Indonesia with other countries suggests various models and approaches that could be considered to improve Indonesia's cabinet formation process.

6). Future Arrangement of Indonesia's Presidential Cabinet

It's undeniable that in a presidential system, the president holds the sole authority to form the cabinet. However, to ensure effective governance, a compatible cabinet should be established. Thus, the president's sole authority in forming a cabinet can be "intervened" as long as it contributes to the creation of an effective cabinet. Reflecting on the issues faced during President Jokowi's leadership, there's a

need to restructure the cabinet formation by adopting mechanisms from other countries.

C. Adopting the American "Confirmation Hearing" Model or the Philippine "Commission of Appointment"

One way to increase accountability and transparency is to implement legislative approval, similar to the "confirmation hearing" in the US. Another is to adopt the Philippine Commission of Appointment model. The goal is to maintain the president's authority while ensuring the competence of appointed ministers.

In the Long Term, it is Preferable for Mechanism Provisions to be Enshrined in the Constitution; However, This Requires Considerable Time Due to the Necessity of Amending the 1945 Constitution. Nevertheless, in the Short Term, Such Mechanisms Can be Regulated through Legislation, and in this Context, Can be Accommodated within Law Number 39 of 2008 concerning State Ministries.

1). Post-Appointment Oversight Mechanism like in South Africa

After appointment, a strong oversight mechanism, like in South Africa, where the cabinet is overseen by an independent ethics and compliance committee, can be adopted. This committee would receive regular performance reports and could independently investigate any irregularities.

2). Balancing Politics and Meritocracy

Countries like South Africa and the Philippines show that a balance between political needs and meritocracy is possible. Ministers should meet meritocratic criteria while also considering political representation.

3). Making the Process More Participatory

Inspired by the US or the Philippines, the cabinet formation process can be more participatory by involving civil society, academics, and experts in the selection or evaluation of ministerial candidates (Dalupe, 2023)

4). Strengthening Policy Continuity

To ensure policy continuity, Indonesia can introduce the principles of "policy continuity" present in the US and the Philippines, where core policies continue even with ministerial or cabinet changes.

5). Transparency in Coalitions

Countries like Argentina and South Africa show how transparency in coalition formation can be essential. It can be a vital step for Indonesia to ensure that coalition processes are more inclusive and transparent.

6). Periodic Audits and Evaluations

All these countries have some form of periodic evaluation, be it by the legislative body or an independent institution. Adopting this model will increase cabinet accountability and efficiency.

By implementing some or all of these ideas, Indonesia has the potential to reform and modernize its cabinet formation process, resulting in a more efficient, effective, and responsive government.

Conclusion

From the above discussion, it's evident that while both countries have a presidential system, in practice, cabinet formation varies. The US, with its nomination and Senate approval processes, provides an example of how checks and balances can function effectively. The Philippines, despite its strong presidential powers, maintains accountability through the Commission of Appointment, something Indonesia can consider. Argentina, with its tendency for rapid cabinet reshuffles, highlights the need for stronger mechanisms for evaluating ministerial performance and ensuring policy continuity. South Africa offers a unique model of post-appointment oversight by an ethics committee, something Indonesia can adopt for post-appointment accountability.

Indonesia, with its relatively young democratisation background, faces challenges. Cabinets in Indonesia often result from complex political coalitions, affecting levels of meritocracy and accountability. The rapid ministerial rotations and lack of transparency in some cases indicate areas for improvement.

Based on this comparative analysis, several ideas can be offered for Indonesia's future cabinet formation. Firstly, adopting the "Confirmation Hearing" model or the Philippine Commission of Appointment. Secondly, enhancing accountability through stronger review mechanisms, possibly adopting an ethics committee model like in South Africa. Thirdly, implementing a more transparent nomination and review process, akin to practices in the US. By considering the best practices from the four mentioned countries, Indonesia stands a chance to reform its cabinet formation process, making it more effective, transparent, and accountable.

Author Contribution

MYA was fully responsible for the entire research process. This contribution included formulating the study concept and design, collecting and analyzing data, interpreting findings, and writing and compiling the final draft.

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