



Regulatory-Practice Gap in Productive Zakat Governance: A Case Study of BAZNAS Tasikmalaya

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Abstract

Productive zakat plays a strategic role in poverty alleviation by directing zakat funds toward the economic independence of mustahik, aligning with the maqashid syariah principle of hifz al-mal (protection and development of wealth). The Government issued Regulation of the Minister of Religious Affairs (PMA) Number 16 of 2025 as a new legal foundation for productive zakat governance, superseding PMA Number 52 of 2014. However, its implementation at the regional level remains suboptimal, as found at BAZNAS Tasikmalaya City. This study aims to examine and formulate the direction of transformation in productive zakat governance at BAZNAS Tasikmalaya City in line with the regulation. The study employs a qualitative approach with a case study design, using field observation, interviews with seven key informants, and document review, analyzed through data reduction, data display, and conclusion drawing. The results show that zakat distribution remains dominated by consumptive schemes, while the Mustahik Menjadi Muzaki program operates without sound planning, structured mentoring, or standardized monitoring-evaluation systems. Drawing on Edwards III's policy implementation framework, this gap stems from limited internal system readiness rather than regulatory resistance. The study proposes three synchronization strategies: positioning productive zakat as a flagship program, strengthening mustahik mentoring, and developing a measurable indicator-based monitoring-evaluation system.

Zakat produktif berperan strategis dalam pengentasan kemiskinan melalui pendayagunaan dana zakat untuk kemandirian ekonomi mustahik, sejalan dengan prinsip maqashid syariah dalam menjaga dan mengembangkan harta (hifz al-mal). Pemerintah menetapkan Peraturan Menteri Agama (PMA) Nomor 16 Tahun 2025 sebagai landasan hukum baru penguatan tata kelola zakat produktif, menggantikan PMA Nomor 52 Tahun 2014. Namun, implementasinya di tingkat daerah belum optimal, sebagaimana ditemukan pada BAZNAS Kota Tasikmalaya. Penelitian ini bertujuan mengkaji dan merumuskan arah transformasi tata kelola zakat produktif di BAZNAS Kota Tasikmalaya agar selaras dengan PMA tersebut. Penelitian menggunakan pendekatan kualitatif dengan desain studi kasus, melalui observasi lapangan, wawancara dengan tujuh informan kunci, dan kajian dokumen, dianalisis melalui reduksi data, penyajian data, dan penarikan kesimpulan. Hasil menunjukkan penyaluran zakat masih didominasi skema konsumtif, sementara program Mustahik Menjadi Muzaki berjalan tanpa perencanaan matang, pendampingan terstruktur, maupun sistem monitoring-evaluasi baku. Merujuk kerangka implementasi kebijakan

Edwards III, kesenjangan ini bersumber dari keterbatasan kesiapan sistem internal, bukan penolakan regulasi. Penelitian merumuskan tiga strategi sinkronisasi: menjadikan zakat produktif program unggulan, penguatan pendampingan mustahik, dan pengembangan sistem monitoring-evaluasi berbasis indikator terukur.

A. INTRODUCTION

Poverty remains one of the most persistent structural challenges confronting developing nations, and Indonesia is no exception. Among the various instruments available for addressing this challenge, zakat occupies a distinctive position owing to its dual character as both a religious obligation and a redistributive economic mechanism. Effective zakat governance, oriented toward tangible improvements in community welfare, is therefore central to realizing the broader socio-economic objectives embedded within Islamic economic teachings. Within this framework, productive zakat has emerged as one of the most widely advocated approaches: rather than treating zakat funds solely as a means of meeting immediate consumptive needs, this approach directs those funds toward building the economic independence of mustahik (zakat recipients) through the provision of business capital, structured coaching, and sustained technical mentoring. Ridlo (2014) emphasizes that this productive orientation reflects a paradigmatic shift in zakat management, from a purely charitable model toward one rooted in economic empowerment and capacity building. The underlying premise is that a mustahik equipped with productive capital and consistent guidance is far more likely to achieve a stable, self-generated income than one who receives only short-term consumptive assistance. In principle, this scheme aims to generate a permanent source of income, thereby enabling mustahik not merely to satisfy their basic needs but to potentially transform into muzakki (zakat payers) in the future a transformation that both scholars and zakat institutions increasingly regard as the ultimate indicator of successful zakat management (Amar, 2017; Fitri, 2017; Fitriyani & Ubaidillah, 2025).

The conceptual legitimacy of productive zakat, however, cannot rest solely on managerial or administrative reasoning; it requires firmer grounding in Islamic economic thought and contemporary zakat jurisprudence (*fiqh al-zakat*). Classical fiqh literature does not explicitly prohibit the productive utilization of zakat, provided that the funds are ultimately channeled to eligible mustahik and serve to improve their welfare (Qardawi, 2015). This position is reinforced by the maqashid syariah

(objectives of Islamic law) framework, particularly through the dimensions of *hifz al-mal* (protection and development of wealth) and *hifz al-nafs* (protection of life and basic needs). *Hifz al-mal* underscores the importance of preserving and productively developing assets, such that zakat is not merely consumed but is instead oriented toward sustainable investment; *hifz al-nafs*, meanwhile, relates to the fulfillment of essential needs as a precondition for the mustahik's broader economic and social empowerment (Ibrahim et al., 2021; Khatimah & Arham, 2025; Zakariya et al., 2024). Sanusi et al., (2026) argue that a productive zakat program designed holistically around the five dimensions of maqashid produces empowerment outcomes that are considerably more comprehensive and durable than those generated by conventional consumptive distribution, and that the mustahik-to-muzakki transformation represents the most theologically meaningful outcome of zakat-based empowerment one achievable only through the integration of business capital, intensive mentoring, structured monitoring, and spiritual formation within a coherent programmatic framework. This theoretical positioning is significant, as it situates productive zakat not merely as a managerial innovation but as a practice with deep roots in Islamic economic epistemology, thereby strengthening the disciplinary relevance of the present study within the field of Islamic economics and philanthropy.

Indonesia's demographic composition lends particular weight to this discussion. The country is recorded as having the largest Muslim population in the world, with adherents of Islam constituting the overwhelming majority of its citizens. This demographic reality positions Indonesia strategically for the optimal management of zakat, infaq, sadaqah, and waqf (ziswaf), given the sheer scale of potential contributors and beneficiaries involved. When managed systematically and professionally, productive zakat can serve as a strategic instrument for achieving the economic independence of mustahik on a national scale. This potential is not merely theoretical: data compiled by the Center of Strategic Studies of the National Amil Zakat Agency (Puskas BAZNAS) indicate that, cumulatively, zakat programs administered by BAZNAS institutions across Indonesia lifted more than 577,000 individuals out of poverty in the reporting period preceding 2024, underscoring the measurable socio-economic contribution that zakat management can generate when properly directed (BAZNAS, 2025). This finding underscores the urgency of strengthening productive zakat governance, so that collected funds are not merely expended on short-term needs but instead generate sustainable socio-economic impact through the gradual

transformation of mustahik into muzakki a cycle that, if sustained, could meaningfully reduce the fiscal burden of poverty alleviation programs at both the national and regional levels.

In response to the evolving dynamics of national zakat management and the recognized need for a more coherent regulatory framework, the Ministry of Religious Affairs issued Regulation of the Minister of Religious Affairs (PMA) Number 16 of 2025 concerning the Utilization of Zakat for Productive Enterprises. The regulation was signed by Minister of Religious Affairs Nasaruddin Umar on 14 October 2025 and formally took effect two days thereafter (Peraturan Menteri Agama Republik Indonesia No 16 Tahun 2025 Tentang Pendayagunaan Zakat Untuk Usaha Produktif, 2025). Notably, the issuance of this regulation was not an isolated development but a deliberate refinement of the existing regulatory architecture: PMA Number 16 of 2025 formally revokes and supersedes the provisions on productive zakat utilization previously contained within PMA Number 52 of 2014 concerning the Requirements and Procedures for Calculating Zakat Mal and Zakat Fitrah as well as the Utilization of Zakat for Productive Enterprises. Under the earlier framework, productive zakat utilization was addressed only briefly, embedded within a broader regulation primarily concerned with zakat calculation methods, and lacked a dedicated procedural structure for planning, execution, and evaluation. Consequently, although the practice of productive zakat distribution had already been undertaken by numerous zakat institutions prior to 2025, such practices were not anchored in a standardized regulatory reference, resulting in considerable variation in implementation quality across institutions. PMA Number 16 of 2025 addresses this deficiency by establishing productive zakat as a distinct regulatory subject, thereby signaling a clear governmental intent to elevate its institutional and procedural rigor.

Substantively, PMA Number 16 of 2025 refines prior policy and constitutes a follow-up to the mandate of Article 27, Paragraph (3) of Law Number 23 of 2011 on Zakat Management, which grants zakat institutions the flexibility to allocate zakat funds toward productive programs, provided that the basic needs of mustahik have already been met, the utilization conforms to sharia principles, it generates tangible economic value for the poor, and the beneficiaries reside within the institution's designated working area. Building upon this legal foundation, the regulation establishes four integrated stages for the utilization of productive zakat: planning, implementation, control, and reporting. During the planning stage, BAZNAS and LAZ

institutions are obligated to formulate strategic documents aligned with national policy, regional development plans, and the Single Social and Economic Data, the latter being intended to prevent the duplication of assistance and to ensure that distribution reaches genuinely eligible beneficiaries. The regulation further mandates that oversight of productive zakat programs be conducted at least once annually, while institutions are required to submit implementation reports on a semi-annual and annual basis, encompassing planned targets, realized outcomes, obstacles encountered, and recommendations for improvement. Taken together, these provisions are intended to establish a more orderly, targeted, transparent, accountable, and sustainable framework for productive zakat utilization, positioning PMA Number 16 of 2025 as a normative guideline for zakat management institutions seeking to implement economic empowerment programs consistent with both sharia principles and modern management practices.

Despite the comprehensiveness of this regulatory framework, its implementation across regional zakat management institutions has not been uniformly optimal, and empirical evidence regarding actual conditions on the ground remains limited. As an initial step toward identifying the empirical basis for this study, a preliminary field observation was conducted on Wednesday, 24 December 2025, through a direct audience with the Deputy Chairman IV of BAZNAS Tasikmalaya City, Mr. H. Irvan Hilmi, Lc., M.Ag. This preliminary observation indicated that BAZNAS Tasikmalaya City remained unaware, at that time, of the enactment of PMA Number 16 of 2025. It should be emphasized that this observation constitutes a preliminary, exploratory finding intended solely to establish the empirical rationale and urgency for undertaking the present study; it does not represent a definitive or exhaustive research finding, and the substantive, verified findings regarding the institution's governance practices are presented separately in the Results section following systematic data collection and analysis. Nevertheless, this preliminary indication together with informal observations suggesting the continued dominance of consumptive zakat distribution, the absence of a transparent recording and reporting system, and limited, unmeasured mustahik mentoring was sufficient to warrant closer, systematic investigation into the institution's governance practices relative to the newly enacted regulation.

If such a regulatory-practice disconnect is left unaddressed, it carries meaningful consequences. A lack of institutional awareness regarding newly issued

regulation risks creating a persistent gap between national policy intent and local-level implementation, potentially undermining the very objectives that PMA Number 16 of 2025 was designed to achieve. Left unaddressed, efforts to accelerate poverty alleviation through productive zakat risk stagnation, while zakat governance at the regional level risks losing direction in terms of accountability, planning coherence, and program effectiveness. This concern is not unique to Tasikmalaya; it reflects a broader structural challenge inherent in the relationship between centrally issued religious-administrative regulation and the varying institutional capacities of hundreds of regional BAZNAS and LAZ offices distributed across Indonesia's diverse socio-economic landscape.

From an academic standpoint, the effectiveness of productive zakat in fostering the economic independence of mustahik has indeed received sustained scholarly attention over the past decade, though the depth and specificity of this attention warrant closer examination. Early foundational work by Fitri (2017) established that the success of productive zakat programs is closely tied to the intensity and continuity of post-disbursement mentoring, a finding echoed by Barom (2018) in the context of cross-institutional zakat management practices. More recent case-based studies have extended this line of inquiry to specific regional contexts: Khatimah & Arham (2025), examining BAZNAS Kabupaten Pinrang, found that the effectiveness of productive zakat distribution through localized empowerment programs remains constrained by the persistence of poverty despite implementation efforts, pointing to a gap between program design and measurable outcomes. Similarly, Arnita et al., (2026), studying BAZNAS Kabupaten Sintang, reported that although productive zakat programs had been implemented systematically, their effectiveness continued to hinge on managerial capacity, the quality of mentoring, and the extent of local government support. Fitriyani & Ubaidillah (2025), in their study of BAZNAS Kabupaten Banjarnegara, similarly documented measurable improvements in mustahik welfare yet identified limited human-resource capacity as a persistent constraint on the depth and consistency of mentoring activities a pattern that recurs across nearly all of the aforementioned studies regardless of geographic context.

Notwithstanding this accumulating body of evidence on the general effectiveness and operational dynamics of productive zakat, a distinct and more specific research gap remains only minimally addressed: the question of institutional readiness and adaptive capacity in response to newly issued, highly technical

regulation. The single study located that directly engages this question Sulfadli (2026) analysis of the normative-practical gap in productive zakat utilization at BAZNAS, LAZISNU, and LAZISMU institutions in the Special Region of Yogyakarta under PMA Number 16 of 2025 found that while institutions had generally implemented the regulation's provisions at the execution and control stages, a substantial gap persisted at the planning stage, particularly regarding the synchronization of socio-economic data and mustahik records across institutions, each of which continued to rely on divergent internal data-collection systems. This finding is instructive, yet it remains geographically and institutionally limited to a single province and does not extend to institutions, such as BAZNAS Tasikmalaya City, that reported outright unfamiliarity with the regulation itself rather than partial compliance. Given that PMA Number 16 of 2025 was only recently enacted in late 2025, research specifically addressing the readiness and adaptation of regional zakat institutions to this regulation particularly institutions at an earlier stage of regulatory awareness remains markedly limited both in volume and in geographic scope. This literature gap, situated at the intersection of regulatory implementation studies and productive zakat governance research, constitutes the central academic justification for the present study.

Building on the foregoing discussion, this study focuses on examining and formulating the direction of transformation in productive zakat governance at BAZNAS Tasikmalaya City in alignment with the mandate of PMA Number 16 of 2025. Unlike prior studies, which have predominantly examined the general effectiveness or operational outcomes of productive zakat programs already in relatively mature stages of implementation, this study offers a distinct contribution by capturing an earlier and less-explored point in the regulatory adoption process: institutional readiness in adapting to a newly enacted regulation under conditions of limited initial awareness. This dimension remains largely unexplored in the existing literature, given both the regulation's recent promulgation and the tendency of prior studies to focus on institutions already engaged in some form of regulatory compliance. This study therefore aims not only to identify the administrative and operational challenges faced by BAZNAS Tasikmalaya City during its transition toward regulatory compliance, but also to formulate context-sensitive adaptation strategies encompassing legal compliance, mustahik mentoring, and reporting transparency and accountability.

To ensure conceptual clarity and methodological focus, several boundaries define the scope of this study. First, the analysis is confined to the institutional and

governance dimensions of productive zakat management at BAZNAS Tasikmalaya City, namely legality and regulatory compliance, mustahik mentoring mechanisms, and reporting transparency and accountability, rather than to a quantitative measurement of the economic impact of productive zakat on individual mustahik income or welfare, which falls outside the intended scope of this inquiry. Second, the study is limited to a single-institution case study; while this design enables an in-depth, contextually grounded analysis, the findings are not intended to be statistically generalized to all regional BAZNAS institutions across Indonesia, whose institutional capacities and regulatory awareness may vary considerably. Third, the temporal scope of this study is bounded by the period immediately following the enactment of PMA Number 16 of 2025, meaning that the findings reflect a specific transitional moment in the regulation's early implementation rather than its long-term, matured institutionalization. Through this bounded but focused approach, the study is expected to bridge the gap between national policy and local practice, while serving as both a practical and academic reference for BAZNAS Tasikmalaya City and comparable institutions in optimizing the utilization of productive zakat, so that zakat may genuinely function as a measurable instrument of sustainable economic independence for the ummah, in accordance with national standards.

B. RESEARCH METHODOLOGY

This study employs a qualitative approach with a case study design to examine the implementation of productive zakat governance at BAZNAS Tasikmalaya City and the extent to which it aligns with the Regulation of the Minister of Religious Affairs (PMA) Number 16 of 2025. A case study design was selected because this research focuses on a single institution within a specific context, thereby enabling an in-depth exploration of the processes, institutional practices, and dynamics of policy implementation at the regional level (Creswell & Creswell, 2018; Yin, 2003). The research was conducted at BAZNAS Tasikmalaya City, with data collection carried out from December 2025 to June 2026.

Primary data were collected through direct field observation and in-depth interviews with seven key informants, ranging from the Chairman to the executive staff of BAZNAS Tasikmalaya City who are directly involved in the productive zakat program. Informants were selected through purposive sampling based on their direct involvement in and understanding of the mechanisms for productive zakat

distribution, mustahik mentoring, and the institution's reporting and accountability systems. To maintain transparency regarding informant composition while preserving confidentiality, informants are coded as presented in Table 1.

Table 1. Profile of Key Informants

Code	Position	Division
INF-01	Deputy Chairman II	Empowerment and Utilization
INF-02	Deputy Chairman III	Planning, Finance, and Reporting
INF-03	Section Head of Empowerment and Utilization (Productive Zakat)	Empowerment and Utilization
INF-04	Deputy Chairman IV	Human Resources, Administration, and General Affairs
INF-05	Administrative Staff	Administration
INF-06	General Affairs Staff	General Affairs
INF-07	Staff	Empowerment and Utilization

Primary data were collected through direct field observation and in-depth interviews with seven key informants, comprising three members of the institution's leadership (the Deputy Chairman for Empowerment and Utilization, the Deputy Chairman for Planning, Finance, and Reporting, and the Deputy Chairman for Human Resources, Administration, and General Affairs), one section head specifically responsible for productive zakat, and three executive staff from the administration division, the general affairs division, and the empowerment and utilization division, as detailed in Table 1. The initial audience with the Deputy Chairman for Human Resources, Administration, and General Affairs, Mr. H. Irvan Hilmi, Lc., M.Ag. (INF-04), as referenced in the Introduction, served as the entry point that directed the researcher toward the urgency of this study; he subsequently became one of the key informants formally interviewed during the main data collection process. This composition was selected to represent perspectives across institutional levels, from policymakers to field-level implementers, thereby enabling a more comprehensive depiction of productive zakat practices (Moleong, 2018).

This study employs a qualitative approach with a case study design to examine the implementation of productive zakat governance at BAZNAS Tasikmalaya City and

the extent to which it aligns with the Regulation of the Minister of Religious Affairs (PMA) Number 16 of 2025. A case study design was selected because this research focuses on a single institution within a specific context, thereby enabling an in-depth exploration of the processes, institutional practices, and dynamics of policy implementation at the regional level (Creswell & Creswell, 2018; Yin, 2003). The research was conducted at BAZNAS Tasikmalaya City, with data collection carried out from December 2025 to June 2026.

As supporting data, this study also employed document review, encompassing PMA Number 16 of 2025, official BAZNAS reports, and scientific literature related to productive zakat and zakat governance. Data derived from these documents served as the normative analytical basis for evaluating the consistency between regulation and the institution's operational practices in the field (Bowen, 2009). To ensure data validity, this study applied source triangulation by comparing the results of observation, interviews, and document review, thereby producing findings that are more credible and not reliant on a single data source.

Data analysis was conducted qualitatively through three stages as proposed by (Miles et al., 2014): data reduction, data display, and conclusion drawing. The categorized data were then analyzed thematically to identify discrepancies between regulatory provisions and their implementation in practice, particularly with respect to legal compliance, mustahik mentoring, and reporting clarity and accountability. The results of this analysis were subsequently used as the basis for formulating recommendations to improve productive zakat governance at BAZNAS Tasikmalaya City in accordance with the provisions of PMA Number 16 of 2025.

C. RESULTS AND DISCUSSION

Results

This section presents the research findings on productive zakat management at BAZNAS Tasikmalaya City, based on field observations, interviews with seven key informants, and document review. BAZNAS Tasikmalaya City operates with an organizational structure comprising four main divisions: collection; distribution and utilization; planning and reporting; and administration and finance. Interview results indicate that inter-divisional coordination has not functioned optimally, particularly in supporting the development of productive zakat programs, which require strong and sustained cross-divisional synergy.

Field data show that zakat distribution by BAZNAS Tasikmalaya City remains dominated by consumptive schemes social assistance, aid for the poor, educational support, and healthcare services. Fund allocation for productive zakat is considerably more limited and is not accompanied by clearly directed long-term program planning.

BAZNAS Tasikmalaya City has implemented the Mustahik Menjadi Muzaki (M2M) program, which is conceptually aligned with the spirit of PMA Number 16 of 2025. However, the program's outcomes remain limited, as reflected in three principal findings regarding its implementation in the field. First, mentoring remains largely unstructured: business coaching, financial management strengthening, and monitoring of mustahik business development have not been carried out consistently, owing to limitations in human resources and budget. Second, no standardized monitoring and evaluation system has been established; BAZNAS Tasikmalaya City lacks structured performance indicators such as income growth or business stability among mustahik as well as a standardized procedure for reporting business progress. Third, internal policies have yet to make explicit reference to PMA Number 16 of 2025, as productive zakat management practices continue to follow prior working patterns without technical adjustments in response to the new regulation. Taken together, these findings indicate that the M2M program, while conceptually promising, has not been operationalized in a way that fully reflects the structured, accountable governance envisioned under the current regulatory framework.

This study is limited by its single-institution case study scope, which constrains the generalizability of the findings to other BAZNAS institutions with differing socio-economic characteristics. The relatively short observation period also limits the study's capacity to capture longitudinal changes in governance practices. Future research is recommended to conduct comparative studies across multiple regional BAZNAS institutions to test the consistency of these findings more broadly, and to adopt a longitudinal approach to observe the impact of PMA Number 16 of 2025 implementation over time.

BAZNAS Tasikmalaya City has implemented the Mustahik Menjadi Muzaki (M2M) program, which is conceptually aligned with the spirit of PMA Number 16 of 2025. Three principal findings emerged regarding its implementation in the field, as summarized in Table 2.

Table 2. Summary of Field Findings on M2M Program Implementation

No	Finding	Field Evidence
1	Mentoring remains largely unstructured	Business coaching, financial management strengthening, and monitoring of mustahik business development have not been carried out consistently, owing to limitations in human resources and budget
2	No standardized monitoring and evaluation system	BAZNAS Tasikmalaya City lacks structured performance indicators (e.g., income growth or business stability among mustahik) and a standardized procedure for reporting business progress
3	Internal policies lack explicit reference to PMA Number 16 of 2025	Productive zakat management practices continue to follow prior working patterns without technical adjustments in response to the new regulation

Source: Field data, 2025–2026

Discussion

1. The Concept of Productive Zakat under PMA Number 16 of 2025

PMA Number 16 of 2025 defines productive zakat as the utilization of zakat funds directed toward income-generating and developable activities, rather than the mere fulfillment of short-term needs (Peraturan Menteri Agama Republik Indonesia No 16 Tahun 2025 Tentang Pendayagunaan Zakat Untuk Usaha Produktif, 2025). This concept aligns with the objectives of zakat management stipulated in Law Number 23 of 2011, which positions mustahik not merely as aid recipients but as subjects encouraged to develop toward economic independence. The regulation explicitly distinguishes consumptive zakat intended for urgent needs such as food and healthcare from productive zakat, which emphasizes planning, sustained mentoring, and structured evaluation as an integrated empowerment cycle. Building on the findings presented above, the M2M program at BAZNAS Tasikmalaya City is conceptually well-positioned within this framework; however, as the field evidence in Table 2 indicates, it has not yet been operationalized in a manner that fully reflects the structured, accountable governance model envisioned by the regulation a gap examined further in the following sub-section.

2. The Gap between Regulation and Field Practice

The findings of this study reveal a clear gap between the normative framework of PMA Number 16 of 2025 and operational practice at BAZNAS Tasikmalaya City. The three core elements emphasized by the regulation sound planning, sustained mentoring, and structured evaluation, have not been fully internalized within the institution's internal policies. This condition is consistent with Fitri (2017) argument that the success of productive zakat depends heavily on the intensity of mentoring rather than solely on the amount of capital disbursed. A similar pattern is evident in Khatimah & Arham (2025) study of BAZNAS Kabupaten Pinrang, which found that despite the implementation of productive zakat programs, poverty levels in the region continued to rise over a three-year period a discrepancy the authors attributed to insufficient depth of mentoring and monitoring relative to the scale of funds distributed. The convergence of these findings across two distinct regional contexts suggests that the absence of structured mentoring is not merely an isolated institutional shortcoming at BAZNAS Tasikmalaya City, but potentially reflects a broader structural pattern among regional zakat institutions still adapting to productive-zakat mandates. In the case of BAZNAS Tasikmalaya City specifically, this absence of structured mentoring risks reducing the strategic function of productive zakat to mere consumptive assistance that is quickly exhausted, rather than serving as an instrument for transforming mustahik into muzakki.

This gap can also be explained through the lens of policy implementation theory. Edward III (1980) argues that the effectiveness of policy implementation is jointly determined by four interacting variables: communication, resources, disposition, and bureaucratic structure. Viewed through this framework, the case of BAZNAS Tasikmalaya City reflects deficiencies across at least three of these dimensions. First, in terms of communication, the institution's initial unfamiliarity with PMA Number 16 of 2025 as identified in the preliminary observation indicates that the regulation's content had not been adequately disseminated to implementing agencies at the regional level. Second, in terms of resources, the limitations in human resources and budget identified in this study directly constrain the institution's capacity to carry out sustained mentoring and structured evaluation, regardless of its willingness to comply. Third, in terms of bureaucratic structure, the absence of internal policies explicitly referencing the new regulation indicates that existing standard operating procedures have not yet been adjusted to accommodate its technical

requirements. Notably, however, the disposition dimension, reflecting the institution's willingness to comply does not appear to be a primary constraint; rather, the core issue lies in the internal system's readiness to operationalize provisions that are technical in nature and require long-term planning, not in resistance to the regulation itself.

The findings of this study reveal a clear gap between the normative framework of PMA Number 16 of 2025 and operational practice at BAZNAS Tasikmalaya City. The three core elements emphasized by the regulation sound planning, sustained mentoring, and structured evaluation have not been fully internalized within the institution's internal policies. This condition is consistent with Fitri (2017) and Semmawi et al., (2024) argument that the success of productive zakat depends heavily on the intensity of mentoring rather than solely on the amount of capital disbursed. The absence of structured mentoring in the case of BAZNAS Tasikmalaya City risks reducing the strategic function of productive zakat to mere consumptive assistance that is quickly exhausted, rather than serving as an instrument for transforming mustahik into muzakki.

This gap can also be explained through a policy implementation perspective, in which the effectiveness of a regulation is determined not only by the quality of the norms it establishes but also by the institutional capacity of implementing agencies at the regional level. The limitations in human resources and budget identified in this study indicate that the core issue lies not in resistance to the regulation, but in the internal system's readiness to operationalize provisions that are technical in nature and require long-term planning.

3. Strategy for Synchronizing Productive Zakat Governance

In response to this gap, the study proposes three synchronization strategies. First, positioning productive zakat as a flagship program rather than a complement to consumptive zakat, through internal policies that explicitly establish it as an institutional priority, accompanied by medium- and long-term planning. Second, strengthening the mustahik mentoring system in a structured manner, spanning from business planning through progress evaluation, and encompassing business-skills coaching and financial management strengthening—an approach consistent with the findings of Arnita et al., (2026) and Fitriyani & Ubaidillah (2025), both of which identified sustained, structured mentoring as the primary determinant of productive zakat effectiveness in their respective regional contexts. Third, developing a monitoring and evaluation system grounded in measurable performance indicators,

such as income growth and business sustainability among mustahik, as an objective basis for assessing program success. Cross-institutional collaboration with Regional Government Agencies (OPD), philanthropic organizations, and Islamic civil-society organizations is likewise relevant for strengthening mentoring capacity, which remains the primary point of weakness identified across this and comparable studies.

4. Academic and Practical Implications

This study enriches the body of research on productive zakat, particularly regarding the implementation of policy at the regional institutional level. The finding of a gap between PMA Number 16 of 2025 and field practice contributes to the discourse in Islamic economics and Islamic philanthropy, demonstrating consistent with Fitri (2017), Barom (2018) and Khatimah & Arham (2025) that the success of productive zakat is determined not solely by regulation but also by institutional readiness and consistent oversight mechanisms. By situating these findings within Edward III (1980) policy implementation framework, this study further contributes a structured analytical lens through which the regulatory-practice gap in productive zakat governance can be systematically examined, an approach that remains uncommon in the existing zakat governance literature. These findings open avenues for future research examining the effectiveness of productive zakat from a public-policy perspective and a broader zakat-institution governance framework, particularly across multiple regional institutions and over longer observation periods.

This study offers strategic input for BAZNAS Tasikmalaya City to strengthen its internal policies, including the establishment of a sustained mentoring system and structured evaluation indicators. Enhancing regulatory socialization and understanding among regional zakat administrators is an urgent step to ensure that productive zakat implementation aligns with national standards, enabling productive zakat to function as an empowerment instrument with tangible impact on the economic independence of mustahik in Tasikmalaya City. Beyond Tasikmalaya, these findings may also inform other regional BAZNAS and LAZ institutions facing comparable transitional challenges in adapting to PMA Number 16 of 2025, particularly institutions with similarly limited human resources and budgetary capacity.

D. CONCLUSION

This study set out to examine the extent to which productive zakat governance at BAZNAS Tasikmalaya City aligns with PMA Number 16 of 2025, and to formulate strategies for closing any gap identified. The findings answer this in clear terms: alignment remains partial. Consumptive distribution continues to dominate the institution's practice, and the M2M program, though conceptually consistent with the regulation, operates without the planning depth, mentoring structure, and evaluation mechanisms the regulation envisions, with internal policy yet to explicitly incorporate its provisions.

Read through the lens of Edward III (1980) implementation framework, this outcome is best understood not as resistance but as a readiness gap: the institution's constraints in human resources, budget, and cross-divisional coordination limit its capacity to operationalize technical, long-term mandates, even where willingness to comply is not in question. This reframing carries the study's central academic contribution, that productive zakat's success hinges as much on institutional readiness as on regulatory design and grounds its three proposed strategies: establishing productive zakat as a flagship rather than supplementary program, embedding structured and sustained mustahik mentoring, and building a monitoring-evaluation system anchored in measurable indicators.

For BAZNAS Tasikmalaya City, these strategies translate into an immediate agenda for internal policy reform. For the wider field, the study extends the literature on productive zakat by documenting how a regional institution navigates the early, less-examined phase of adapting to newly issued regulation, complementing prior work that has largely focused on more mature stages of implementation.

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