Risk Identification and Management of State-Owned Assets: A Case Study of the ABC Office

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ABSTRACT

The management of State-Owned Assets (SOA) at the ABC Office has consistently been identified as an issue in the audit findings of the Supreme Audit Agency (BPK) from 2021 to 2023. This persistent concern necessitates an analysis to determine whether the risk identification processes for SOA management at the ABC Office align with the standards outlined in PMK Number 222 of 2021 and KMK Number 105 of 2022. This study employs a qualitative case study methodology. The research findings were derived from a content analysis of secondary data and validated through semi-structured interviews with eight informants employed at the ABC Office. These combined methods ensured the reliability and depth of the results. The study's findings reveal that the risk identification process for managing State-Owned Assets does not fully comply with the relevant regulations. A significant issue lies in the tendency to prioritize risk events based on the focus and directives of the unit leader overseeing the risk owner. Consequently, several critical risks related to SOA management remain unidentified. To address these shortcomings, it is essential for the ABC Office to enhance the involvement of the risk management unit. By providing greater support to the SOA management unit (the risk owner), the risk management unit can facilitate the selection of appropriate risk identification techniques. This approach would enable the identification of key risks that hinder effective SOA management, thereby improving compliance and operational effectiveness.

Keywords: Risk identification; Management of State-Owned Assets; Sector Public.

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Analisis Identifikasi Risiko atas Pengelolaan Barang yang Menjadi Milik Negara (Studi Kasus: Kantor ABC)

ABSTRAK

Permasalahan pengelolaan BMMN pada Kantor ABC selalu menjadi temuan BPK dari tahun 2021 s.d. 2023 sehingga perlu dilakukan penelitian untuk menganalisis apakah proses identifikasi risiko atas pengelolaan BMMN pada Kantor ABC sesuai dengan PMK Nomor 222 Tahun 2021 dan KMK Nomor 105 Tahun 2022. Penelitian ini menggunakan metodelogi kualitatif studi kasus. Temuan penelitian diperoleh dari hasil analisis konten data sekunder dan dikonfirmasi me-lalui wawancara semi terstruktur dengan pegawai Kantor ABC. Hasil penelitian ini menunjukkan bahwa proses identifikasi risiko pengelolaan BMMN belum sepenuhnya memenuhi ketentuan yang berlaku. Hal ini disebabkan karena proses identifikasi kejadian risiko cenderung berfokus pada arahan/concern pimpinan unit risk owner sehingga terdapat beberapa risiko pengelolaan BMMN yang belum diidentifikasi. Oleh sebab itu, Kantor ABC harus meningkatkan peran unit manajemen risiko dalam membantu unit pengelola BMMN (risk owner) dalam menentukan teknik identifikasi risiko yang tepat sehingga risiko-risiko utama yang menjadi penghambat dalam pengelolaan BMMN dapat teridentifikasi.

Kata Kunci: Identifikasi risiko; Barang yang Menjadi Milik Negara; Sektor Publik.

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INTRODUCTION

The government bears the responsibility of controlling, supervising, and administering public assets (Nanang et al., 2023). Public assets are critical in supporting the government's efforts to deliver essential services to the community (Syaifudin et al., 2020). Effective asset management is, therefore, integral to enhancing the quality of public services (Tirayoh et al., 2021). However, achieving this is a complex challenge (Syaifudin et al., 2020).

In Indonesia, numerous issues hinder effective asset management. These include non-compliance with applicable regulations (Khoirudin et al., 2021; Tirayoh et al., 2021), reliance on manual asset recording processes (Suharsih et al., 2021), the absence of comprehensive Standard Operating Procedures (SOPs) for asset management (Sitanggang & Setiawan, 2022), and the inherent complexity of asset management, which necessitates a multidisciplinary approach (Hasbi Hanis et al., 2011; Wang et al., 2023). Addressing these challenges requires the implementation of robust asset management practices to ensure reliability and optimize the utilization of government assets (Lima & Costa, 2019).

State-Owned Assets (SOA) represent a specific category of government assets managed by the Directorate General of Customs and Excise (DGCE). Under PMK Number 150 of 2023, the auctioning of SOA is one of the prescribed methods for their settlement (Kemenkeu, 2023). Proceeds from SOA auctions are recorded as Non-Tax State Revenue by the DGCE. According to data from the DGCE Financial Report for 2018 to 2023, revenue from SOA auctions has consistently accounted for over 49% of the total Non-Tax State Revenue collected by the DGCE annually (DGCE, 2023). A detailed representation of the DGCE's Non-Tax State Revenue realization from 2018 to 2023 is provided in Figure 1.

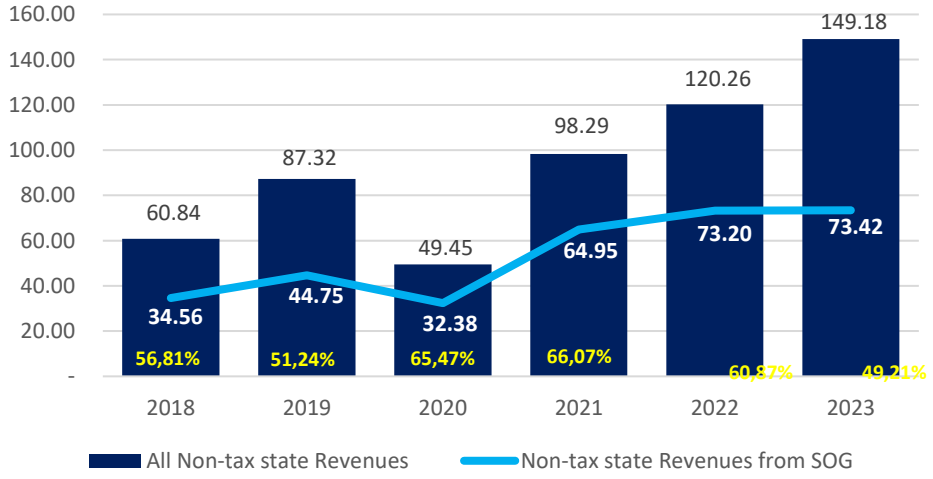


Figure 1. Realization of Non-Tax State Revenue of DGCE 2018 to 2023 (in billion rupiah)

Source: Financial Statement DGCE, 2018 s.d 2023

Although SOA management has contributed over 49% of the Directorate General of Customs and Excise's (DGCE) total non-tax state revenue, the Supreme Audit Agency (BPK) has assessed the management of SOA at DGCE as suboptimal. According to the Audit Result Report (LHP) of the Audit Board of Indonesia Number 33.b/LHP/XV/05/2024, DGCE's work units have not

adequately fulfilled their responsibilities in storing, administering, supervising, and controlling SOA management.

The ABC Office is one of the DGCE units responsible for managing SOA. Financial reports from DGCE for 2021 and 2022 reveal that the ABC Office is the largest contributor to non-tax state revenue from SOA auctions, accounting for over 50% of DGCE's total non-tax revenue from SOA. Furthermore, the ABC Office manages 25.40% of DGCE's outstanding SOA balance (DGCE, 2023). From 2021 to 2023, the ABC Office has been a consistent subject of BPK audit sampling for SOA management. These audits have identified several persistent issues, including unresolved SOA cases and outdated records in the Customs Record Book (CRB) and SOA Reports. The complexity of SOA management at the ABC Office is emblematic of broader challenges faced by DGCE, making the ABC Office an appropriate focus for this case study.

Risk management has been widely recognized as a critical tool for enhancing governance in both the private and public sectors (Priyarsono et al., 2023). In asset management, it plays a vital role in improving processes and outcomes by systematically analyzing risks and assessing their potential impacts on operations, finances, reputation, and strategic objectives. This systematic approach facilitates effective risk mitigation (Asnawi et al., 2023), aligning with the broader benefits of risk management, such as enhancing accountability and governance (Kemenkeu, 2021, 2022). Despite its potential to improve SOA management, risk management was not implemented at the ABC Office until 2024, even though issues identified by the BPK have persisted since 2021.

According to KMK Number 105 of 2022, risk identification can utilize historical data from both internal and external sources, including audit reports from the Audit Board of the Republic of Indonesia or Inspectorate General, Loss Event Database Reports, Internal Control Monitoring Reports, leadership directives, stakeholder forum outcomes, reports from other institutions, mass media, and other relevant data sources (Kemenkeu, 2022). However, the ABC Office's risk identification process for SOA management relies solely on leadership directives concerning immediate concerns, leaving many risks unaddressed. This approach increases the likelihood of recurring or significant audit findings by the BPK in the future.

Research on the application of risk management in public asset management has been extensive internationally, focusing on areas such as maintenance cost efficiency, procurement effectiveness, investment decisions, public transparency, and customer service optimization (Alshboul et al., 2023; Khallaf et al., 2018; Nlenanya & Smadi, 2021; Sasidharan et al., 2022; Stark & Juran, 2022; Syed & Lawryshyn, 2020). In Indonesia, similar studies have highlighted its benefits in improving customer service, optimizing non-tax state revenue, and enhancing the use of IT assets (Ainuzzahrah & Martani, 2023; Ayuningtyas & Tanaem, 2022; Fajar et al., 2019). This study contributes to the existing literature by addressing a novel aspect: the application of KMK Number 105 of 2022 in identifying risks in SOA management. Given the scarcity of research on SOA management, this study provides a unique perspective that enriches the understanding of risk management in public sector asset management.

This research evaluates whether the risk identification process for SOA management at the ABC Office aligns with PMK Number 222 of 2021 and KMK Number 105 of 2022. The study focuses on two Customs Storage Places (CSPs), namely CSP TPI and CSP TCI. As reported in the ABC Office SOA Report for Semester I of 2024, these two CSPs manage 53.76% and 9.36% of the SOA, respectively. Together, they account for 63.12% of the total SOA decrees managed by the ABC Office, making them representative of the broader condition of SOA management within the office.

RESEARCH METHODS

This study employs a qualitative case study methodology, an empirical approach designed to conduct detailed and in-depth analysis of contemporary phenomena or complex issues within real-world contexts (Creswell & Poth, 2018; Kin, 2018; Pandey & Patnaik, 2020; Schoch, 2019). The case study method is particularly effective in addressing research questions framed as "how" or "why" (Kin, 2018; Shishkov, 2020), making it suitable for exploring the intricacies of SOA management and risk identification.

The data collection process in this research is conducted in two stages: secondary data collection and primary data collection. Secondary data serves as the basis for evaluating existing conditions and informs the development of interview questions. Primary data is subsequently collected to explore or confirm specific issues related to the risk identification process in SOA management. The combined analysis of both data sources provides the foundation for drawing conclusions.

The secondary data utilized in this study include the 2024 Risk Management Context, 2024 Risk Profile, SOA Customs Record Book (CRB), SOA Report for Semester I of 2024, Minutes of SOA Reconciliation Results for Semester I of 2024, Assessment Reports, BPK Audit Result Reports (LHP) for Financial Reports from 2021 to 2023, and the 2023 Audit Results Report (LHA) of the Inspectorate General. Content analysis of the secondary data is conducted to assess the completeness of risk profile components and to determine whether they meet the criteria specified in KMK Number 105 of 2022.

Primary data is collected through semi-structured interviews. This approach allows for a guided exploration of topics using a predefined set of questions developed from the analysis of secondary data. The interview participants include employees responsible for risk management in SOA operations at the ABC Office, with details of the sources provided in Table 1.

Sources A1 and A2 were chosen for their roles in compiling and reviewing the 2024 risk profile for SOA management. Their input offers insights into how the risk identification process is implemented. Sources B1 to B6 consist of employees involved in the management and administration of SOA. Their perspectives are critical for identifying potential risks that may not have been captured in the 2024 risk profile.

Table 1. Interview Source

No	Source Code	Role of Resource Persons
1	A1	Employees who manage risk management for SOA administration
2	A2	ABC Office Risk Administrator Staff
3	B1	Employees in charge of issuing SOA Decision Letters
4	B2	Employees who manage SOA appraisal and auction requests
5	B3	Employees who manage SOA appraisal and auction requests
6	B4	Employees who manage SOA Reports and the destruction process
7	B5	Employees on duty at the CSP Warehouse
8	B6	Employees on duty at the CSP Warehouse

Source: Research Data, 2024

The questions for the semi-structured interviews are developed based on issues identified during the review of source documents. Questions related to evaluating the risk management process are derived from the findings of the risk profile document review. Conversely, questions addressing potential risks are formulated based on potential risks highlighted in SOA management documents and the findings from audits conducted by the Inspectorate General and the BPK. The substantive topics covered in the interview questions are outlined in Table 2.

Table 2. Interview Questions Substance List

No	Interview Question Substance	Source Code	References
1.	The process of creating a risk register includes determining the events, causes, impacts, and risk categories	A1, A2	• KMK Number 105 of 2022 • Risk Profile 2024
2.	Identification of potential new risks related to the results of the BPK and Inspectorate General's audits	B1, B2, B3, B4, B5, B6	• Risk Profile 2024 • LHP BPK • LHA Itjen
3.	Identification of potential new risks related to the SOA completion time norms based on Perdirjen Number 16 of 2013	B1, B2, B3, B4, B5, B6	• Perdirjen 16 of 2023 • BCP SOA
4.	Identification of potential new risks related to the reconciliation of SOA data that has received DJKN approval between the ABC Office and the ABC KPKNL	B4	• Minutes of SOA Reconciliation Results • SOA Report of 2024 Semester I
5.	Identification of potential new risks related to the implementation of the auction	B2, B3	• Auction Monitoring Report

Source: Research Data, 2024

Triangulation plays a crucial role in data analysis within case study research, as it enhances the validity of the study's constructs (Kin, 2018). This research employs both methodological triangulation and data source triangulation. Methodological triangulation involves using multiple methods to examine the phenomenon under study (Campbell et al., 2020). Specifically, this study applies methodological triangulation by integrating interview data and document reviews to ensure a comprehensive understanding.

Data source triangulation involves gathering data from various sources or stakeholders, differentiated by the time of collection, location, or the individuals providing the information (Campbell et al., 2020; Levin, 2019). In this study, data source triangulation is achieved by interviewing a range of participants with diverse roles in the risk management process for SOA management. This approach ensures a more robust and multidimensional analysis.

The data analysis process is tailored to the type and objectives of the research. Both secondary and primary data are analyzed using content analysis techniques. Content analysis involves systematically collecting and organizing data to extract meaningful information, which is then coded into categories or groups based on predefined criteria (Soldatenko & Backer, 2019). This method provides a structured framework for deriving insights from the data while maintaining analytical rigor.

RESULTS AND DISCUSSION

As of 2024, the ABC Office has identified a single risk associated with the management of SOA: the prolonged process involved in settling State-Owned Assets (SOA). This operational risk arises from four distinct causes and results in a single documented impact. The findings from the document analysis regarding the risk identification process for SOA management are summarized in Table 3.

Table 3 highlights seven risk identification component criteria that are not applicable to this assessment. Specifically, criteria 1, 2, 17, 18, 19, and 20 are excluded from the analysis because these criteria are designed to evaluate the risk identification process across all ABC Offices. In contrast, this study focuses exclusively on risks associated with SOA management. Similarly, criterion 12 is deemed irrelevant, as the risk profile lists only a single risk impact, rendering this criterion inapplicable.

Additionally, Table 3 identifies three risk identification component criteria that require confirmation through interviews with relevant sources. These criteria are: (1) whether multiple causes are prioritized based on their significance, (2) whether the number of risk causes in each risk event reflects an objective judgment by the UPR leader, and (3) whether the number of risk impacts in each risk event is determined by the UPR leader's objective judgment. Confirmation is necessary because these aspects are not explicitly addressed in the available source documents. Verifying this information is critical to assessing whether the preparation of risk identification components aligns with applicable regulations.

For 2024, risk events related to SOA management were identified as having four causes in the risk profile. According to confirmation from the risk administrator staff, all four causes hold equal significance. Consequently, their arrangement in the profile is based on the sequential stages of the SOA management process, ensuring alignment with the procedural framework.

> "*We think the significance is the same between numbers 1, 2, 3, and 4. So, the order in real conditions does not describe the most significant or the least significant because, for example, if number 1 is delayed, it will disrupt the entire SOA completion process*." (Source Person A2)

Table 3. Document Analysis Results for Risk Identification

Data Components	Data Component Criteria	Check List
Risk Event	**1.** Each Organizational Target has at least one risk	N/A
	2. A risk event can only be categorized in one Organizational Target	N/A
	3. A risk event is not a sentence of negation of an Organizational Target	√
	4. A risk event is not a negation of a key performance indicator	√
	5. A risk event is a statement of the condition of an event that does not mention the cause and/or impact	√
	6. A risk event statement must be specific and not a normative statement	√
Risk Causes	**7.** Each risk event has at least one risk cause	√
	8. If there is more than one cause, then they are sorted based on their significance	√*
	9. The number of risks caused in each risk event is an objective judgment of the UPR leader	√*
	10. Each risk event has a maximum of 5 risk causes	√
Risk Impact	**11.** Each risk event has a relevant risk impact	√
	12. If there is more than one risk impact, then it is sorted based on its significance	N/A
	13. The number of risk impacts on each risk event is an objective judgment of the UPR leader	√*
Risk Category	**14.** Risk categories apply to both upside risk and downside risk	√
	15. Risk categories are determined based on risk events	√
	16. Each risk has one risk category	√
	17. ABC Office, a UPR-Two, has at least three risk categories.	N/A
	18. Each UPR must have a fraud risk category	N/A
	19. UPR-Two must have an operational risk category	N/A
	20. Each Organizational Target has at least one risk	N/A

Source: Research Data, 2024
Information:
√ : Available
√* : Available, but requires confirmation
X : Not Available
N/A : Not Applicable

The ABC Office has never had a specific policy regarding the number of risk causes and impacts for each risk event.

"*So far, there is no policy in the ABC Office regarding the maximum number. However, as far as I know, there has never been a risk cause where one risk is the cause of more than five. Regarding the number of impacts, the ABC Office does not have a policy for determining the number of impacts of each identified risk.*" (Source Person A2)

The evaluation of the ABC Office's risk identification process for SOA management, based on document analysis and interviews with relevant sources, is summarized in Table 4. According to the evaluation results, the identification of risk events does not fully align with the criteria outlined in KMK Number 105 of 2022. However, the identification of causes, impacts, and risk categories complies with the stipulated criteria.

The risk identification process for SOA management at the ABC Office predominantly reflects the directives and priorities of the PPC III Division leadership. This approach overlooks the findings from audits and reviews conducted by the BPK and the Inspectorate General, leading to the omission of certain risks associated with SOA management. Incorporating historical data from these audit results into the risk identification process has been shown in prior research to improve outcomes, such as optimizing non-tax state revenue from BMN leases (Ainuzzahrah & Martani, 2023).

To address these gaps, the Risk Management Unit at the ABC Office must enhance its support to risk owners, particularly SOA management units, in identifying appropriate risk identification techniques. This alignment would enable the identification of critical risks that impede effective SOA management. Woods (2022) underscores the importance of this collaborative approach, noting that while risk identification remains the responsibility of risk owners, risk management units play a vital role in guiding them toward the selection of effective techniques.

Table 4 Risk Identification Process Evaluation Results

Data Components	Evaluation Results	Evaluation Results Analysis	The problem
Risk Event	Partially fulfilled	Not all SOA management risks that have the potential to hinder the achievement of organizational targets are identified.	Risk identification only focuses on the direction/concerns of the risk owner unit leader.
Risk Causes	Fulfilled	The four risk causes are relevant to SOA management risk events and have met the applicable criteria.	-
Risk Impact	Fulfilled	The risk impact is relevant to the SOA management risk event and has met the applicable criteria.	-
Risk Category	Fulfilled	The risk category meets the applicable criteria.	-

Source: Research Data, 2024

The causes outlined in the 2024 risk profile for SOA management align with the criteria established in KMK Number 105 of 2024. These criteria specify that 1 to 5 risk causes should be identified and ranked based on their significance. Similarly, the risk impacts included in the 2024 risk profile meet the stipulated criteria by being directly relevant to the identified risk event. The risk categories in the profile also comply with the requirements, with each risk event assigned a single, clearly defined category. For SOA management, the selected category is operational risk, which is appropriate given that the associated risks pertain to inefficiencies in the business processes of SOA management at the ABC Office, preventing optimal adherence to applicable regulations.

Since 2023, the Head of the ABC Office has expressed increasing concern over the unresolved issues surrounding SOA settlement, which have been consistently highlighted in BPK audit findings. As a result, in 2024, the risk

associated with SOA settlement was formally recognized as one of the ABC Office's key risk events. However, the risk management staff in the SOA management unit limited their risk identification to issues specifically highlighted by the leadership, leading to only a single risk event being recorded for SOA management. This narrow focus underscores the need for further research to identify additional risks that may affect SOA management processes. This study identifies potential new risks related to the activities of SOA management, administration, and reporting. A detailed summary of these potential risks is presented in Table 5, highlighting areas that warrant further exploration to ensure comprehensive risk identification and mitigation strategies. Interviews with relevant sources are conducted to validate the potential new risks identified through document analysis, determining whether these risks remain relevant or have been mitigated through improvements in control activities.

Table 5 Results of Identification of New Potential Risks

No	Risk Identification Description	Source Document			Interview Results
		LHP	LHA	Internal	
1.	Issuance of multiple SOA Certificates for the same goods	√	√		Not Relevant
2.	SOA in CSP is challenging to identify	√			Not Relevant
3.	SOA being moved without officers' knowledge or being lost	√			Not Relevant
4.	Recording and updating SOA settlement in the SOA CRB is different from the SOA Report	√		√	Relevant
5.	SOA reconciliation data not being by the SOA Report	√	√	√	Relevant
6.	SOA reconciliation data not being by the SOA Report			√	Relevant
7.	The number of auctions not being carried out according to plan		√	√	Relevant

Source: Research Data, 2024

Three potential risks were found to be no longer relevant due to enhancements in the internal control system. The details of these risks are as follows. First, the risk of issuing multiple SOA Decrees for the same goods is no longer relevant. According to source B1, this issue has not occurred during their tenure. This finding is consistent with the 2023 Audit Results Report (LHA) from the Inspectorate General, which noted that such incidents were limited to documents issued in 2021. The control measure implemented to address this issue involves confirming the status of goods with the CSP Warehouse before issuing SOA Decrees, effectively preventing duplication.

"*Regarding the issuance of the same SOA Decree, it happens that in my work, it has never happened because when we draft the SOA Decree, we usually confirm with the CSP […] Are the goods in the CSP and is the status still BTD or BDN […] before we submit it to the head of the office, we confirm it*." (Source Person B1)

Second, the potential risk of SOA in CSP is challenging to identify and is no longer relevant because the CSP Warehouse has been arranged since 2022. The

arrangement involved adding shelves to store Less Container Load (LCL) goods and providing identification through blocking and shelf numbers.

"*TPI's warehouse was indeed not very neat […] Then the arrangement started in what year, 2022 if I am not mistaken […] So that became the focus of the hangar at that time to arrange it starting from the procurement of shelves […] The process continues until now, […] now it is probably neat, so we already know what the goods are in this, if we point to the goods in which block, we already know what the status of this item is, what the label is, what the number is* […]" (Source Person B5)

"*For example, the TPI's warehouse is now well organized because shelves have been installed […]. So TPI's also has a section […] LCL goods in the TCI's warehouse are still put into one container*." (Source Person B6)

Third, the potential risk of SOA being moved without officers' knowledge or lost is no longer relevant because of the CCTV covering all SOA movements in the CSP Warehouse.

"*For CCTV, there is an entrance and an exit. There is also CCTV in the warehouse and at the inspection site. There are also those around the warehouse.*"(Source Person B5)

As presented in Table 4, four new potential risks remain relevant. The first is the potential risk of discrepancies between the recording and updating of SOA settlements in the SOA Customs Record Book (CRB) and the SOA Report. This risk persists because, as of June 30, 2024, data from the Semester I Report indicates ongoing differences between the two records. The issue arises from the continued use of two separate working papers for recording purposes. Both working papers are manually updated by multiple individuals, complicating the ability of the SOA reporting person-in-charge (PIC) to effectively monitor and control updates to SOA settlement data.

"[…] all SOA data movements in the financial report [...] are summarized first. […] If my friends in the office who are the auction PICs update it in the SOA BCP, then for the summary of updates or movement of goods, my colleagues and I update the SOA report, so that is it." (Source Person B4)

The second potential risk is the misalignment between SOA reconciliation data and the SOA Report, which remains relevant. This misalignment persists because nearly all SOA settlement processes currently exceed the established time norms. While existing regulations include provisions allowing the ABC Office to implement policies tailored to its specific conditions—given the significantly larger volume of SOA it manages compared to other DGCE work units—these provisions have not yet been effectively utilized. To address this issue, adjustments to the SOA settlement process are necessary to enhance efficiency and ensure optimal alignment between reconciliation data and the SOA Report.

"*So, because our work process is batching, we collect several SOAs first and then submit them [...] However, with this Per-16, [...] the process must run itself; it cannot be batched like that. That is why the assessment request will be carried out per document later, with the existence of Per-16 and this KEP related to the period*." (Source Person B3)

The third potential risk, the misalignment between SOA reconciliation data and the SOA Report, remains relevant. This discrepancy arises because the data used for reconciliation is sourced not from the SOA Report but from monitoring records maintained by officers responsible for submitting allocation approval requests to the KPKNL. As of Semester I of 2024, the reconciliation process has

become a mandatory requirement. However, the ABC Office currently relies on multiple working papers to monitor SOA settlements, making it challenging to identify which working paper serves as the most reliable source.

"*The employee responsible for managing the SOA settlement approval documents has his monitoring records (monitoring data for the Allocation Approval Letter owned by sources B2 and B3 and is not part of the SOA BCP or SOA Report)*" (Source Person B4)

Fourth, the potential risk of the number of auctions not being conducted as planned remains relevant. As of the first semester of 2024, only three auctions had been completed, falling short of the target of five. Additionally, the revenue from SOA auctions during this period decreased by Rp5,671,011,625, representing a 44.85% decline compared to the same period in the previous year. Two primary factors contributed to this decline. The first was the inability to secure an auction schedule from the State Property and Auction Service Office (KPKNL). The second was an internal policy within the Directorate General of Customs and Excise (DGCE), which introduced new issues or regulations concerning the commodity goods designated for auction.

"*If there has not been much attention in the last 2 years, we can still do a lot on time, [...]. In recent years, we have had much attention, so the Head Office has appealed not to hold auctions for certain commodities. [...] This is our lowest achievement*." (Source Person B2)

"*Regarding non-tax state revenue value or the price formed, it has also fallen significantly from the previous year. Usually, textile commodities drive up the high prices. This year, textiles are in the spotlight or the latest societal issue. This caused the decline in non-tax state revenue from the SOA auction*." (Source Person B3)

The new risk identification process employed in this study aligns with the approach described by Khallaf et al. (2018), which involves utilizing recorded data and documents, followed by confirmation with experts in the relevant field. This confirmation provides insights that are not explicitly stated in the existing data and documents. By combining explicit knowledge derived from documentation with implicit knowledge gained from field expertise, this method enhances the validity and comprehensiveness of the identified risks (Khallaf et al., 2018).

The use of recorded data and documents in the risk identification process also allows for a comparison between the applicable provisions for SOA management and the actual practices at the ABC Office. As noted by Fajar et al. (2019), such comparisons are instrumental in assessing organizational performance. Deviations from established provisions indicate areas of risk, highlighting opportunities for improvement.

This study identifies four potential new risks that remain relevant based on source documents and feedback from related stakeholders. These risks should be incorporated into the risk register for inclusion in the SOA management risk profile. The details of these newly identified risks are presented in Table 5.

CONCLUSION

The risk identification process for SOA management at the ABC Office does not yet fully comply with the provisions outlined in PMK Number 222 of 2021 and KMK Number 105 of 2022. This shortfall stems from a risk event identification process that predominantly reflects the priorities and concerns of the risk owner

Table 6 New Risk Identification Summary

Information	Risk 1	Risk 2	Risk 3	Risk 4
Risk Event	Recording and updating of SOA settlement in the SOA CRB is different from the SOA Report	SOA completion does not comply with the established time standards	SOA reconciliation result data does not match the SOA Report	The number of auctions carried out did not meet the set target
Risk Causes	1. SOA CRB Data and SOA Reports are not reconciled before being reported 2. Recording and updating of SOA settlement documents is done manually 3. Several people carry out the process of recording and updating SOA settlement documents	1. SOA Assessment Request is made more than seven working days from the date of the decision regarding the determination of SOA 2. Submission of the proposed allocation is made more than 15 working days from the date of the assessment report document	1. The approval update for the allocation differs between the source document and the monitoring of the approval for the allocation with the SOA Report. 2. The data used for reconciliation is not SOA Report data.	1. The number of SOA Decrees ready for auction has decreased 2. Did not get an auction schedule according to predictions
Risk Impact	1. This problem can be a BPK finding 2. The data produced by the SOA CRB and the SOA Report are less reliable	The SOA settlement process needed to be improved, causing SOA to pile up in the CSP Warehouse.	The value of SOA inventory on ABC Office's Balance Sheet is understated.	There was a decrease in the realization of non-tax state revenue from the SOA Auction at the ABC Office.
Risk Category	Operational Risk	Operational Risk	Operational Risk	Operational Risk
Risk Identification Source	1. BPK Audit Report 2021 and 2023 2. Results of SOA CRB data analysis and SOA Report 2024	1. BPK Audit Results Report 2022 2. Inspectorate General Audit Results Report 2023 3. SOA CRB data analysis results	Results of the analysis of the SOA Report documents and the Minutes of the SOA Reconciliation Results for Semester I 2024	1. Audit Report of Inspectorate General 2023 2. Analysis of auction monitoring documents and realization of Non-tax revenue from SOA Auction

Source: Research Data, 2024

unit leader. As a result, several issues in SOA management that could hinder the ABC Office's organizational objectives have not been adequately identified. To address this, risk owners must employ appropriate techniques to comprehensively identify risks associated with SOA management. Additionally, the risk management unit should play a more proactive role in assisting risk owners in selecting effective identification techniques to ensure that all potential risks are thoroughly recognized.

Based on an analysis of source documents and interviews with relevant stakeholders, four new potential risks related to SOA management have been identified: (1) discrepancies between the recording and updating of SOA settlements in the SOA Customs Record Book (CRB) and the SOA Report, (2) mismatches between SOA reconciliation data and the SOA Report, (3) duplication of discrepancies in SOA reconciliation data and the SOA Report, and (4) the number of auctions not aligning with planned targets.

This study has certain limitations, primarily the inability to interview the risk owner leader to explore why only one risk event was emphasized in SOA management. Future research could expand the scope to encompass the entire risk management process—from risk scoping to monitoring—to provide a more comprehensive understanding of risk management in SOA administration at the ABC Office.

Additionally, further studies could extend to other work units within the Directorate General of Customs and Excise (DGCE), enabling benchmarking of SOA risk management practices across units. Such comparative research would contribute to the development of risk management strategies and inform policy recommendations aimed at improving control, accountability, and overall effectiveness in the administration and management of SOA.

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