

What's Wrong with Shariah Governance and Audit of Zakat Institutions in Indonesia?

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ABSTRACT

Management of Zakat by Zakat Management Organization (OPZ) must comply with Islamic law. The Shariah supervisory board (SSB/SSB) is responsible for ensuring Sharia compliance of Amil Zakat Institution (LAZ), but so far there is no clear provision regarding Sharia Supervisory Board (SSB) at National Zakat Board (BAZNAS). Both must undergo Shariah audit (Shariah compliance audit). More importantly for LAZ, a Shariah audit is a requirement to apply for a permit extension. This study aims to analyze the implementation of Shariah Governance and auditing at OPZs in Indonesia. This study uses a qualitative approach. Data consists of secondary and primary data collected through documentation and interview techniques. The informants of this study were OPZ amil, Public Accounting Firm (KAP) auditors, and the Ministry of Religion. The results of the study indicate that the implementation of Sharia Governance in OPZ is still not going well. It is known that several SSB in LAZ are not actively carrying out their duties so that no one supervises the Sharia aspect in zakat management. There are still many OPZs that have not yet been audited by the Ministry of Religion. This study recommends that the SSB structure in OPZ be strengthened, both in LAZ and BAZNAS, to get satisfactory results in the Shariah audit.

Keywords: Shariah Governance, Shariah Audit, Sharia Compliance, Shariah Supervisory Board (SSB), Optimization

INTRODUCTION

Zakat has a significant role in Islam because it is the fourth pillar of the religion. In the Qur'an, Allah SWT juxtaposes the word zakat with shala 82 times (Qardhawi, 1973). It shows that zakat has an important virtue as well as prayer. The difference is that zakat is a kind of worship that serves not only a vertical dimension (to Allah swt), but also horizontal dimension (to other Muslims).

Zakat also contains economic and social dimensions as it involves the distribution of wealth among Muslims and generosity to help others. Islam has special attention in the management of zakat, starting from the process of collecting fund

from muzakki, managing it done by amil to distributing it to mustahik. Islam regulates all these processes framed in sharia principles. It is a crucial thing to do so that the Zakat Management Organization (OPZ), both BAZNAS and LAZ, can prevent themselves from violating sharia principles whose implications could ruin the reputation of OPZ (Hakim, 2019).

In Law Number 23 of 2011 concerning Zakat Management, the Government has regulated several important aspects related to the implementation of sharia principles by OPZ. In general, the regulation emphasizes that zakat management must be carried out in accordance with Sharia principles, including the requirement for OPZ to have

a SSB and conduct sharia audits periodically.

In addition, the Zakat Core Principles (ZCP) issued by BAZNAS, Bank Indonesia and IRTI-IsDB, as the main reference in zakat management by OPZ, have stressed the importance of shariah governance (Shariah Governance) of OPZ with the aim of ensuring zakat management goes in line with the shariah principles (BAZNAS et al, 2017).

The Ministry of Religion of the Republic of Indonesia as the regulator and BAZNAS as the coordinator of zakat management have issued a number of legal instruments that regulate Sharia aspects in zakat management in the form of regulations and decree of the minister of religion as well as BAZNAS regulations. Thus, OPZ is currently supported by various instruments and adequate guidelines so that the management of zakat can stay in the corridor of sharia principles.



Figure 1. Instruments to Support Sharia Regulations in Zakat Management in Indonesia

Source: Adopted from Nopiardo (2019) and Puskas BAZNAS (2020)

In the FGD of shariah audit organized by the Directorate of Zakat and Waqf Empowerment of the Ministry of Religion, it was stated that there are only few BAZNAS/LAZ that have been audited in sharia law. Based on the data from the Ministry of Religion, the Directorate of Zakat and Waqf Empowerment, as well as the data from BAZNAS, as of March 2021, there were 633 OPZ. Only 267 or about 47% of OPZ have undergone the sharia audit. The number indicates bad governance.

Next, it is necessary to conduct a thorough evaluation of the implementation of sharia governance by OPZ and the implementation of a Sharia audit by the Ministry of Religion to ensure that zakat management by OPZ complies with sharia principles as reflected in the zakat regulations. Currently, the evaluation of the implementation of Shariah governance and the implementation of Shariah audits of OPZ is not completely done, yet.

This study intends to evaluate the implementation of Shariah governance and

Shariah audit implementation of OPZ and recommend ways to better the two elements in the management of zakat by OPZ. It is so as to offer feedback to OPZ as well as the Ministry of Religion to improve zakat management so that it complies with zakat regulations and sharia principles (sharia-compliance). With the improvement of OPZ's level of compliance with sharia principles and applicable regulations, the level of public trust in OPZ will also increase.

LITERATURE REVIEW

Zakat Management Organization (OPZ)

OPZ is an institution responsible for the management of zakat funds and infaq/alms (Widodo and Kustiawan, 2001). Zakat management according to Law Number 23 of 2011 is an activity of planning, implementing, and coordinating the collection, distribution, and utilization of zakat. Funds managed by the Zakat Institution are not limited to zakat funds, but also include infaq/alms funds and other religious social funds.

In Indonesia, there are 2 types of OPZ; BAZNAS and LAZ. BAZNAS is a non-structural government institution formed by the government to carry out the function of zakat management. Meanwhile, LAZ is an institution formed by the community which has the task of assisting BAZNAS in the management of zakat. BAZNAS and LAZ can be domiciled at the Central/National, Provincial or Regency/City.

Sharia Governance and Zakat Institution

According to Mahmudi (2009), optimization of zakat management is strongly influenced by the quality of the OPZ management. The application of good governance principles is needed to ensure that zakat funds from the community have been managed optimally.

There are, at least, five main principles in good governance: 1) transparency, 2) accountability, 3) responsibility, 4) independence, 5) fairness (abbreviated as TARIF). These five main principles, and the principle of Sharia compliance become the main reference for the implementation of good OPZ governance. The sharia compliance principle is added because the management of zakat by OPZ must comply with Islamic Sharia principles in the process of collection, distribution, utilization and reporting. Therefore, a sharia supervisor or SSB is needed.

SSB consists of at least 2 (two) or more persons and one of whom is appointed as the Chairperson. According to PP No. 14, the board can be taken from the internal LAZ or external parties (outside LAZ) who are appointed as SSB, included in the organizational structure to supervise and ensure the compliance of Sharia principles in zakat management. SSB has an important role in the Sharia internal control of OPZ.

The principles of Sharia compliance and the existence of SSB make the governance of OPZ different from other non-profit oriented entities. Sharia governance is an important dimension to ensure sharia compliance in every aspect of the implementation of zakat activities.

Referring to the ZCP standard No. 15, sharia governance of OPZ covers auditing, disclosure, and transparency aspects, which are important dimensions to ensure sharia compliance in every aspect of zakat operational activities. OPZ must uphold sharia control and internal audit to minimize operational risk and sharia governance. In the aspect of Shariah governance, the existence of SSB determines that the OPZ has proper shariah control and an internal audit framework to establish and maintain well-controlled operational shariah controls.

Muzaki's trust in OPZs is still low because people believe that there is a weak

and non-transparent system in the government creating doubt in the community that the zakat does not reach those who are entitled to receive it (Fadilah et al., 2018). Good governance in zakat institutions has been implemented in several aspects but has not been implemented comprehensively (Tahliani, 2018).

Shariah Audit and Zakat Institution

The Law Number 23 of 2011 requires OPZ to be audited financially and audited by Sharia on a regular basis. The financial audit is conducted by the Independent Auditor of the Public Accounting Firm (KAP) which aims to provide an opinion on whether the financial statements have been presented fairly, in accordance with applicable financial accounting standards (SAK), and are free of material misstatement. In contrast to financial audits, Sharia audits are audits conducted by a Sharia Auditor of the Inspectorate General of the Ministry of Religion (Itjen MoRA) which aims to ensure Shariah compliance of OPZs in zakat management.

In addition to the SSB in charge of overseeing the compliance of Sharia principles internally, OPZs are also audited for Sharia by the Inspector General of the Ministry of Religion as the regulator. The Sharia audit conducted by the Inspector General of the Ministry of Religion is certainly more independent than the SSB, because it is an external party that has no affiliation with OPZ. Sharia audit serves as one of the requirements for extending the license for OPZ, especially LAZ.

A different situation happens to Islamic financial institutions where supervision and guarantees for compliance with Sharia principles are only available to SSB. There is no independent external party³, including regulators that conducts Sharia compliance audits to LKS.

The Ministry of Religion has issued KMA No. 733 of 2018 which was revised

to KMA No. 606 of 2020 concerning Shariah Audit Guidelines. The KMA serves as a guide for the Inspector General of the Ministry of Religion in carrying out his duties as a Sharia auditor. Sharia audits are carried out on the collection, distribution and utilization of zakat, infaq, alms and other religious social funds conducted by BAZNAS and LAZ.

In general, the Shariah audit guidelines have set out Shariah rules and principles that should serve as guidelines in the implementation of the management of zakat, infaq/alms and other religious social funds. In addition, the Shariah audit guidelines have also regulated the critical points that must be a concern for Shariah auditors, the code of ethics that must be adhered to and the prohibitions that must be avoided in carrying out shariah audits.

A Sharia Auditor is the Inspector General of the Ministry of Religion who has met special skills and training as well as an understanding of Islamic law, especially the fiqh of zakat. One of the training that must be taken is Sharia accounting training, especially Sharia PSAK 101 on Presentation of Sharia Financial Statements Appendix C and 109 on Accounting for Zakat and Infaq/Alms.

Currently, there are no specific provisions regarding certain educational backgrounds to become a sharia auditor. However, Sharia graduates are considered more suitable because of the need for mastery and understanding related to OPZ Sharia compliance, especially the fiqh of zakat.

Previous Studies

The application of Good Governance Principles in zakat management consists of; 1) Transparency, meaning that LAZ must apply the principle of information disclosure to stakeholders; 2) Accountability, meaning that LAZ must hold the principle of trust (accountability) in managing zakat funds; 3) Responsibility,

meaning that LAZ is responsible for distributing zakat funds to mustahiq; 4) Independence, meaning that LAZ is managed independently and does not have dependence on certain people or other institutions; 5) Justice, meaning that LAZ must try as much as possible to be fair in distributing zakat funds to those who are entitled; 6) Sharia Compliance, meaning that the collection and distribution of zakat funds must comply with sharia provisions (Permana & Baehaqi, 2018).

The issue of transparency is very crucial for OPZ as institutions that manage public funds, because this will have a direct impact on the good or bad reputation of OPZ systemically. International organizations such as the IMF and the World Bank as well as Islamic international organizations such as the IFSB and AAOIFI have strictly implemented financial reporting transparency. High transparency reduces the risk of failure in the management of financial institutions. Good transparency increases public trust in the governance of the funds entrusted (Puskas BAZNAS, 2019).

This is in line with the results of research (Amalia, 2019) which found the dimensions of transparency that most contribute to good governance, followed by accountability, responsibility and independence. The transparency of zakat management has a significant influence on the interest of muzakki to pay zakat through OPZ (Antonio et al., 2020). Transparency is part of public ethics in building healthy zakat financial institution governance (Puskas BAZNAS, 2019).

The OPZ is an intermediary institution that manages people's funds so that there is a need for transparency regarding the management of the resources owned (Harto et al., 2018). The indicators that are met to achieve transparency are accountability and openly reporting any activities carried out to stakeholders, accessibility or ease of access and

publication of financial reports (Novitasari et al., 2018).

SSB acting as sharia non-traditional governance can significantly reduce earnings management in Islamic banks (Elnahass et al., 2021). OPZ must carry out good governance to demonstrate legitimacy and achieve a high level of zakat compliance (Sawmar & Mohammed, 2021). To become a zakat institution that has good governance, it must meet several criteria, namely distribution, efficiency, and financial reporting criteria (Adiwijaya & Suprianto, 2020).

Research Kiongkok et al. (2021) uses the tenure of sharia supervisors as a proxy for sharia governance. The results of the study found that the tenure of the sharia supervisory board was a positive and linear predictor of firm performance and that there was a curvilinear relationship between the tenure of the sharia supervisory board and the performance of Islamic financial institutions.

Good governance of OPZ in Indonesia has been applied in several aspects of zakat regulations. However, in several other aspects, it has not been implemented comprehensively. There are several problems with zakat regulations including limited guidelines and standardization in terms of zakat collection, distribution, supervision and audit (Amalia, 2018).

Good governance and fraud prevention have a significant impact on the performance of zakat institutions. Zakat institutions as trusted institutions must pay more attention to the implementation of fairness to avoid fraud. In addition, fairness is an early signal that accountants can use to detect fraud or mismanagement of zakat distribution (Wahyuni-TD et al., 2021)

Research Aprillianto et al. (2017) in four countries states that the practice of sharia auditing in Islamic financial institutions in Indonesia, Malaysia, Bangladesh, and Brunei Darussalam is in

relatively the same condition based on four aspects of sharia audit practice (framework, scope, auditor qualifications, and auditor independence). The results of the analysis also show that the practice of sharia auditing in these countries has a gap between what is expected and the actual situation.

Research Rashid & Ghazi (2021) shows for better sharia compliance in Islamic banking institutions, the role of audit practitioners is indispensable. Practitioner's competence is one of the important factors that affect the quality of shariah audit. The assessment and identification of shariah risk in terms of different financial arrangements, contracts and transactions requires unique competencies on the part of the auditor, namely, compliance with sharia law in addition to traditional assurance techniques and skills.

RESEARCH METHOD

This study is qualitative research with a descriptive approach because it aims to explain the implementation of Shariah governance in OPZ and sharia audits by Shariah auditors, and provide recommendations on the problems found.

Data sources and data collection techniques in this study consist of secondary data and primary data. Secondary data were obtained through documentation and literature review of journal articles, books, productions and other relevant sources. Primary data were in the form of interviews conducted on site and/or online and were semi-structured with amil of OPZ, Shariah Auditor/MoRA, Auditors of Public Accounting Firm (KAP).

Table 1. A List of Informants

| <i>No.</i> | <i>Informants/Initials</i> | <i>Background/Institution</i> |
|------------|----------------------------|-------------------------------|
| 1. | Interviewee A | LAZ (Provincial Level) |
| 2. | Interviewee B | LAZ (Provincial Level) |
| 3. | Interviewee C | LAZ (District/city Level) |
| 4. | Interviewee D | LAZ (District/city Level) |
| 5. | Interviewee E | LAZ (District/city Level) |
| 6. | Interviewee F | Auditor |
| 7. | Interviewee G | Auditor |
| 8. | Interviewee H | Auditor |
| 9. | Interviewee I | Sharia Auditor/MoRA |
| 10. | Interviewee J | Sharia Auditor/MoRA |
| 11. | Interviewee K | Sharia Auditor/MoRA |

This study uses an interactive data analysis model as described by Miles & Huberman (1994). This model consists of three main steps; data reduction, data presentation and verification/drawing conclusions.

Data reduction is done by summarizing, selecting, sorting, categorizing and documenting data related to the research objectives. The presentation of the data is done through writing, making matrices/tables, pictures explaining the governance and Shariah audit of OPZ.

Finally, conclusion is drawn in response to the research objectives. These three steps are intertwined before, during, and after data collection, forming a cyclical and interactive process. The researcher moves back and forth between reduction, presentation and verification/conclusion activities for the rest of the research time. The data analysis of this research can be depicted in Figure 2.

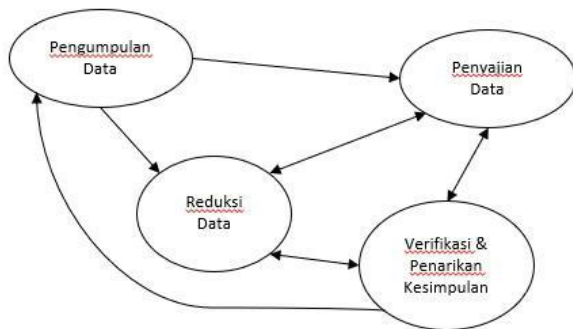


Figure 2. Data Analysis Interactive Model

Source: Miles & Huberman (1994)

Operationalization of research instruments:

1. Sharia Governance, consisting of aspects of auditing, disclosure, and transparency are important dimensions to ensure sharia compliance in every aspect of zakat operational activities.
2. Sharia Audit; audit or inspection process that focuses on the compliance of Shariah entities with Sharia principles in carrying out their operational activities.



Figure 3. Relationship between Fatwa Commission and DSN-MUI

Source: Introduction to DSN and SSB

RESULTS AND DISCUSSION

Sharia Governance; Sharia Compliance, Sharia Supervisory Board (SSB) and Both Optimization

Management of zakat by OPZ must be in accordance with Islamic law or Sharia principles. Sharia principles are fatwas issued by the Fatwa Commission of the Indonesian Ulema Council (MUI) relating to zakat. Therefore, the benchmark for the conformity of Sharia in the management of zakat is the MUI fatwa, not the fiqh opinion of certain scholars, unless a problem is not/has not been regulated in the MUI fatwa. This is due to the diverse opinions of the scholars of fiqh regarding zakat.

According to Mediawati (20XX), SSB plays a role even if just a little in LAZ in the context of Sharia internal control. First, SSB must ensure whether LAZ has

complied with Sharia rules and principles in the management of zakat, including the collection, distribution and utilization of zakat and infaq/alms.

Second, with various contemporary transactions, SSB is obliged to provide suggestions to ensure that all transactions are sharia-compliant and do not violate it. Third, SSB must ensure that the financial statements presented are in accordance with the Statement of Sharia Financial Accounting Standards (PSAK). SSB is involved in ensuring the reliability of financial reports, because financial statements are a form of LAZ's accountability to the public.

Unfortunately, this sharia supervisory rule is only required for LAZ, while BAZNAS does not have to have a sharia supervisor. However, based on profile searches of BAZNAS leaders at the

Regency/City, Provincial and Central levels, there should be at least one BAZNAS leader who has a Sharia background or a member of Central Indonesian Ulema Council (MUI).

Shari'a supervisory rules are only for LAZ. On the other hand, it creates negative perceptions and the assumption that this rule is unfair, not equal treatment between LAZ and BAZNAS (IDEAS, 2020). Even though both have the same obligations, zakat management must be in accordance with Islamic rules and sharia audited by the Inspectorate.

Based on an interview with the Directorate of Zakat and Waqf Empowerment, there will be revisions and improvements to this rule in which the requirement to have a Sharia supervisor will also apply to BAZNAS, not only LAZ.

"...he, in the future there will be revisions related to this, BAZNAS will also be required to have a SSB, so not only LAZ". (Interviewee J)

In the future, the KAP Auditor must first obtain a Sharia opinion from the SSB LAZ before carrying out the audit process. This is to show that the obligations and responsibilities regarding the fulfilment of Sharia principles in zakat management are with the LAZ management, not the KAP auditors. On the other hand, KAP auditors also need to be supported by Sharia accounting certification (SAS) to show that the auditors have adequate competence to audit Shariah entities. Of course, it would be better if the auditors understood the operations of LAZ, the regulations governing LAZ and Sharia PSAK referred to by LAZ.

OPZ in Indonesia still do not have sharia compliance standards and competency standards for zakat supervisory bodies.

"...Last year we gave honorarium, hoping to be active, but it turned out not to be active" (Interviewee C)

"Our SSB is not active, on the other hand we also do not give honorarium to SSB" (Interviewee D)

In certain cases, sharia supervision by DPS has not been carried out optimally. Meanwhile, the sharia supervision function in BAZNAS throughout Indonesia has not been implemented because the Zakat Regulations in Indonesia do not clearly regulate the sharia supervision function for BAZNAS throughout Indonesia. In fact, this function is very important in order to maintain the fulfillment of sharia principles in every business process carried out by BAZNAS throughout Indonesia.

Sharia Audit and Optimization of its Implementation by the Inspectorate General of the Ministry of Religion

The Sharia audit conducted by the Inspectorate General of the Ministry of Religion consists of three (3) substantive tests, namely the collection of zakat, the distribution and utilization of zakat to mustahik and the acceptance and use of amil funds.

First; Substantive testing of collection activities aims to ensure that the conditions and pillars of zakat and their calculations, including haul and nishab, legality of property and full ownership and the calculation of zakat rates are in accordance with Sharia principles. In addition, the Shariah auditors also ensured that the funds did not originate from money laundering, corruption proceeds or other criminal acts.

The Sharia Auditor will conduct an inquiry/request for information and confirmation as well as supporting documents based on the working papers that have been determined, then provide an assessment of the tests that have been carried out. There are 20 substantive test items for collection activities that must be ascertained. For example, the Shariah auditor ensures that the nishab is set at 85 grams of gold for wealth/mal. If the answer

to the examination is "yes", then a score of 10 will be given. If the answer is "partially" (inconsistent use of the 85 gram of nishab for wealth), then a score of 5 will be given. If the answer is "no" or "no answer", then assign a value of 0.

Generally, OPZ does not check or confirm in depth to muzakki on the calculation of their zakat, whether it is in accordance with Sharia principles or not (related to the halal source of wealth, full ownership, haul, nishab and zakat rates). It is only limited to confirming the type of incoming funds, whether zakat funds (professional/income zakat, zakat maal or property zakat), infaq/alms funds (bound or unbound) or other religious social funds.

"If that's the case, it looks like we're interrogating Muzakki, right?"

Worried that we are offended, we usually only confirm the type of incoming funds, ask for proof of the transfer."

On the other hand, OPZ also argues that it has provided information and education through websites, pocket books or taklim activities/webinars regarding zakat fiqh and zakat calculations. The hope is that muzakki can calculate for themselves how much zakat obligation must be paid for the assets they have or the income they receive. Muzakki also feels that the information on wealth and income he receives is private and sensitive, so he feels more comfortable calculating it himself instead of by the OPZ amil. Figure 4 is the forms of education carried out by OPZ

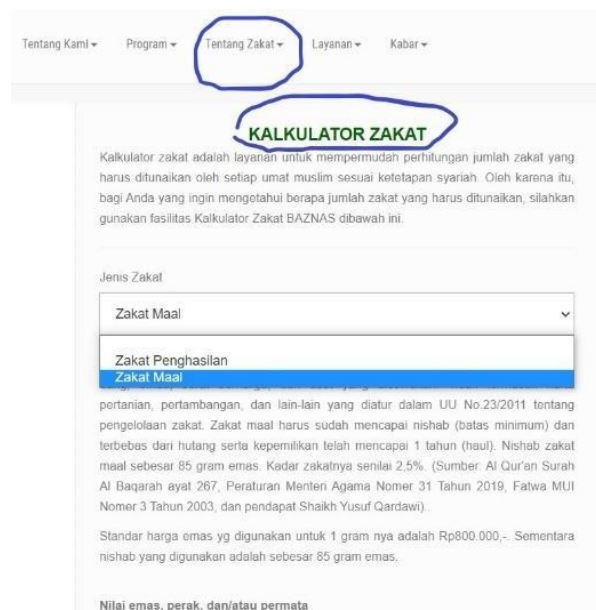


Figure 4. Relationship between Fatwa Commission and DSN-MUI

Source: BAZNAS RI website

Not to mention, during the month of Ramadan, many OPZs have difficulty identifying the type of incoming funds due to crowds, thus making written financial policies, based on historical amounts and types of funds. If there is no information from the muzakki on the incoming funds, then the funds that enter a certain amount will be recognized as zakat funds, but if

they are lacking, they will be recognized as unbound infaq/alms funds.

In relation to money laundering, asset from corruption or other criminal acts, OPZ makes a an initial disclaimer that OPZ does not accept or is involved in money laundering, corruption and other criminal acts such as the Figure 5.

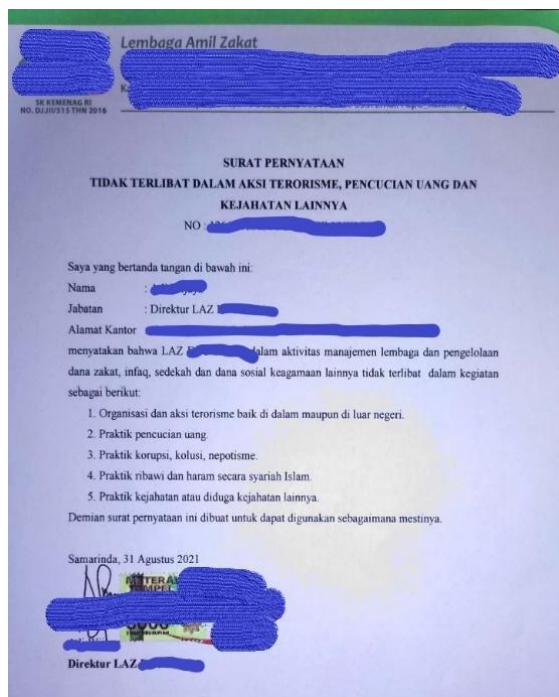


Figure 5.

On the other side, Sharia auditors also found OPZ's pragmatic attitude in collecting activities, especially in acknowledging the type of incoming funds.

“... OPZ acts pragmatically, all incoming funds are recognized as zakat acceptance because there is a certain target collection amount that must be met to meet the requirements as OPZ at a certain regional level”.

Furthermore, even the Sharia auditors found that there were deductions from ASN salaries deposited to OPZ that did not meet the nishab but were recognized as zakat funds, so they were asked to reclassify the acceptance from zakat funds into infaq/alms funds.

Second; substantive testing of the distribution and utilization of zakat to mustahik aims to ensure that zakat is distributed to 8 (eight) asnaf, either directly or through the benefits of goods/services that are directly received by mustahik, according to the targeted criteria, with a priority scale and taking into account the principles of equity, justice, and territory. Zakat funds are distributed purely without

the obligation to return to the institution (not in the form of loans), are not lent or invested until they exceed the distribution time limit (1 year).

The Shariah auditor must ensure that the OPZ distributes zakat funds immediately, not long after they are received from the muzakki, or no more than 1 year. Socio-economic and humanitarian problems that occur in one area can be handled/prioritized in the same location as the collection, the transfer of zakat funds distribution that is not in accordance with the collection location must have a clear basis such as the absence of mustahiq in the area or emergency/special conditions. In addition, the auditors also do not accept gifts or gifts from mustahik related to their duties. There are 26 test items that must be checked and confirmed by the Sharia Auditor with the same assessment criteria.

Third; substantive testing of the receipt and use of amil funds which aims to ensure that the amil rights of zakat and infaq/alms funds are not more than 12.5% and 20% and the fairness of the use of amil funds. There are 10 test items that must be checked and confirmed by the Sharia Auditor with the same assessment criteria.

It's just that currently the number of Sharia auditors is still minimal, so there are still many OPZs that have not been shariah audited.

“At the moment, only a few Inspectors General of the Ministry of Religion are willing to become Sharia auditors” (Interviewee K)

CONCLUSION

The implementation of Sharia Governance in OPZ is still not going well. A number of SSB in LAZ, especially at the provincial and district/city levels, are not actively carrying out their duties so that no one supervises the Sharia aspect in zakat management. There are still many OPZs

that have not been audited by the Ministry of Religion's. Sharia audit staff is still minimal. Recommendations:

1. MUI provides guidance, education and training to SSB LAZ so that they are active in conducting Sharia supervision and submit supervision reports to MUI just as SSB of IFIs are fostered and submit Sharia supervision reports to DSN MUI.
2. It should be a competency test process and mechanism for Zakat shariah supervisory board which is conducted by MUI.
3. Providing incentives and clear job descriptions related to the rights and responsibilities of SSB in carrying out its functions.
4. It is necessary for BAZNAS to have SSB which comes from MUI according to the regional level.
5. The Shariah Compliance Standard should be set up by the authority
6. Request for Sharia opinion from SSB before the KAP auditor conducts an audit of the financial statements of OPZ.
7. KAP auditors who audit OPZ have a good understanding of OPZ operations and Sharia PSAK which are the main reference in preparing financial statements.
8. Auditors and KAP auditing OPZ must be registered with the Ministry of Religion as a regulator just as Auditors and KAPs auditing LKS must be registered with OJK.
9. Empowerment of Sharia accounting certification holders (SAS) outside the Inspectorate General of the Ministry of Religion to be involved/assigned as Sharia auditors of OPZ
10. Sharia audit training and assistance by involving SSB of OPZ.
11. Recruitment of independent parties as sharia auditors who can be from academics, who were previously given training and internships at OPZ. After an internship of at least 3

months, they can take the sharia auditor certification exam and after passing the exam, they can work as sharia auditors.

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