

From Charity to Risk Governance: Zakat, Infaq and Islamic Social Finance in Disaster Response in Aceh

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Abstract

This article examines the legal and institutional conditions under which zakat and infaq administered by Baitul Mal Aceh can complement disaster response and socioeconomic recovery without compromising Islamic beneficiary restrictions or public accountability. It revisits documentary claims concerning 2020–2024 through a normative–sociolegal case study combining Aceh’s special-autonomy framework, the law of zakat distribution, published institutional accounts and disaster-risk governance literature. The central finding is conditional rather than celebratory. Aceh’s legal architecture permits a distinctive form of publicly administered Islamic social finance, while an institutional account confirms the use of the gharimin category for disaster-affected recipients. Yet expenditure on immediate relief is not equivalent to risk mitigation, and aggregate collection or distribution figures cannot establish causal poverty reduction or disaster resilience. Official 2023 and 2024 budget and financial statements provide a firmer basis for examining fund restrictions, programme classification and accounting balances than several uncorroborated figures in the initial manuscript. Drawing on maqasid al-shari’ah and the Sendai Framework, the article develops a restricted-fund, stage-sensitive governance model organised around eligibility, additionality, traceability and resilience. It proposes separate accounting for zakat and infaq, needs-based eligibility decisions, interagency referral protocols, auditable digital records and outcome

measurement. The study contributes a framework for distinguishing lawful emergency redistribution from demonstrable disaster-risk reduction in a subnational Islamic public-finance institution.

KEYWORDS: Baitul Mal Aceh; Islamic economic law; zakat; infaq; maqasid al-shari'ah;

Introduction

Disasters expose the limits of welfare institutions most sharply when households lose not only housing and immediate consumption goods but also tools, livestock, inventories, farmland and access to customers. Recurrent floods and landslides in Aceh create precisely this kind of interlocking economic vulnerability. A damaged road may prevent market participation; the loss of one fishing boat may remove a household's principal livelihood; an untreated illness after displacement may create further debt. The distributive problem is therefore larger than the provision of emergency packages. It involves the restoration of minimum capabilities and the prevention of repeated impoverishment. International disaster policy treats risk prevention, preparedness, response and resilient reconstruction as related but analytically distinct tasks. The Sendai Framework, for example, separates understanding risk, strengthening governance, investing in resilience and improving preparedness and recovery.¹

Aceh presents a particularly instructive legal setting because institutions of Islamic social finance operate inside a system of special regional autonomy. Baitul Mal Aceh (BMA) is not simply a private charity. Under Law No. 11 of 2006 on the Governing of Aceh and the provincial Baitul Mal qanun, it administers zakat and other designated religious assets through an institution embedded in public governance.² The integration creates possible advantages: access to public administrative networks, regularised collection, supervision and the potential to link beneficiaries with social and economic

¹ United Nations Office for Disaster Risk Reduction (UNDRR), Sendai Framework for Disaster Risk Reduction 2015–2030 (Geneva: UNDRR, 2015), priorities 1–4, <https://www.undrr.org/publication/sendai-framework-disaster-risk-reduction-2015-2030>.

² Republic of Indonesia, Law No. 11 of 2006 on the Governing of Aceh (Undang-Undang Nomor 11 Tahun 2006 tentang Pemerintahan Aceh), arts. 180(1)(d) and 191.

programmes. It also creates legal tensions that must not be hidden behind the language of flexibility. An institution managing resources in a governmental setting faces budgetary procedure, audit, public reporting and rights-based eligibility requirements. At the same time, zakat is not an unrestricted general revenue source available for any governmental priority.

The original manuscript, entitled “Transformasi Pengelolaan Zakat, Infak, dan Sedekah (ZIS) dalam Mitigasi Bencana Hidrometeorologi: Studi Kasus Baitul Mal Aceh,” makes a valuable proposal: Islamic social finance might fill practical gaps in post-disaster household recovery. It draws attention to the Baitul Mal qanun, disaster-related interpretations of the *gharimin* category, emergency distribution and digital beneficiary verification. The initial text also contains figures for annual collection, rapid relief, residual balances, and alleged improvements in poverty and recipients’ income. Those propositions deserve different evidentiary treatment. Legal authority can be established from enacted instruments; a reported institutional programme can be established from an attributable announcement; a claim of measurable poverty reduction requires an evaluation design capable of estimating attribution. Treating all three as equally proven weakens rather than strengthens the case for Islamic social finance.³

These distinctions extend an established scholarly conversation about the ability of zakat and waqf to alleviate poverty, rather than claiming that institutional social finance is a new invention. Habib Ahmed’s foundational study of zakah and awqaf already identified administrative design as central to translating distributive principles into outcomes.⁴ This article accordingly asks three questions. First, how do Indonesian national law and Aceh’s special-autonomy legislation define the authority and financial constraints of BMA? Second, under what conditions can Islamic principles of zakat entitlement and the protection of welfare justify assistance to people affected

³ Armiadi Musa, “Transformasi Pengelolaan Zakat, Infak, dan Sedekah (ZIS) dalam Mitigasi Bencana Hidrometeorologi: Studi Kasus Baitul Mal Aceh” (unpublished manuscript supplied for editorial revision, n.d.). The source manuscript includes no complete supporting bibliography or primary dataset for several numerical impact claims.

⁴ Habib Ahmed, *Role of Zakah and Awqaf in Poverty Alleviation*, Occasional Paper No. 8 (Jeddah: Islamic Research and Training Institute, Islamic Development Bank, 2004), <https://durham-repository.worktribe.com/output/1126012/role-of-zakat-and-awqaf-in-poverty-alleviation>.

by hydrometeorological disasters? Third, what institutional arrangements would convert emergency redistribution into accountable recovery and, where evidence permits, durable risk reduction? These questions deliberately join Islamic economic law with public-law accountability, instead of discussing fiqh and administrative implementation in disconnected chapters.

The argument is that Aceh's institutional innovation is best understood as a form of conditional complementarity. BMA may use restricted zakat for eligible people and deploy other funds within their own governing conditions, but these expenditures should complement rather than displace the state's disaster-management duties. The conceptual contribution is a four-part test—eligibility, additionality, traceability and resilience—through which the legality and practical value of disaster-oriented Islamic social finance can be assessed. In this account, eligibility asks who may receive each fund, additionality asks what unmet need the intervention addresses, traceability asks whether decisions and transfers can be audited, and resilience asks whether an intervention reduces subsequent vulnerability rather than merely recording disbursement.

The article is written for an international law-review audience. Indonesian terms such as *qanun* (Aceh regional legislation), *mustahik* (a legally eligible zakat recipient), *muzakki* (a zakat payer), and *asnaf* (the Qur'anic beneficiary categories) are retained where their precise legal meaning matters. The article does not assume that a policy description establishes a judicially enforceable right or that a programme described by an institution has been independently evaluated. Its claims are arranged so that the reader can distinguish law, documented administrative practice, analytical inference and prospective recommendations.

Research Design

The research uses a qualitative, document-based sociolegal case-study design. It explicitly re-analyses a supplied Indonesian-language draft rather than claiming to have independently produced the underlying field data.⁵ Its

⁵ Armiadi Musa, "Transformasi Pengelolaan Zakat, Infak, dan Sedekah (ZIS) dalam Mitigasi Bencana Hidrometeorologi: Studi Kasus Baitul Mal Aceh" (unpublished manuscript

jurisdictional subject is Baitul Mal Aceh, principally during 2020–2024, while a small number of materials published later are used to clarify retrospective performance reporting. This is not new ethnographic fieldwork or an impact evaluation. No interview transcripts, beneficiary microdata, disaster-site observations, audit working papers or anonymised household panels were made available with the underlying manuscript. The revised analysis consequently interprets documentary evidence and does not present reconstructed interviews as original empirical discoveries.

The primary legal materials are Law No. 11 of 2006 on the Governing of Aceh; Law No. 23 of 2011 on Zakat Management; Law No. 24 of 2007 on Disaster Management; Qanun Aceh No. 10 of 2018 on Baitul Mal; and Qanun Aceh No. 3 of 2021 amending the Baitul Mal qanun. The latter was promulgated in January 2022, despite its numbering as a 2021 qanun. This temporal qualification matters to any before-and-after claim concerning institutional reform. The revision also considers Governor of Aceh Regulation No. 8 of 2022 on management of zakat and infaq, official financial documentation and published institutional explanations of beneficiary programmes.⁶

Three types of documentary evidence are distinguished. A primary legal text supports statements about powers or restrictions, although application still depends on accurate construction of the provision. Audited public accounts support reported accounting entries, their categories and relevant reporting periods, but not necessarily the independent social impact of expenditure. Institutional press releases and public-information reports document the fact that an agency announced or described a practice; they do not by themselves validate effectiveness or prove programme-wide outcomes. This hierarchy of evidence is applied consistently when reading the numerical claims in the underlying paper.

For the financial assessment, the strongest retrieved data concern the audited 2023 Aceh governmental financial statements. They report collection of zakat and infaq of approximately IDR 89.626 billion and a zakat disbursement allocation of approximately IDR 112.128 billion, against which

supplied for editorial revision, n.d.). The source manuscript includes no complete supporting bibliography or primary dataset for several numerical impact claims.

⁶ Government of Aceh, Qanun Aceh No. 10 of 2018 on Baitul Mal (Qanun Aceh Nomor 10 Tahun 2018 tentang Baitul Mal), promulgated January 4, 2019, <https://peraturan.bpk.go.id/Details/102327/qanun-prov-nad-no-10-tahun-2018>.

approximately IDR 84.328 billion was realised. An official 2024 BMA Secretariat budget-realisation statement records approximately IDR 95.535 billion in realised regional revenue for 2024, while a 2025 news account attributes approximately IDR 95.540 billion in 2024 collections and IDR 89.464 billion in distributions to BMA annual reporting. Because the figures use different presentations and diverge slightly, the categories require reconciliation before being treated as an equivalent audited ZIS series.⁷ Likewise, the initial paper's statements about a six-percent collection ratio, a 70-percent improvement rate among microenterprise beneficiaries, or a fall in Aceh poverty caused by BMA are not reproduced as established findings because the denominators, sampling methods, comparative periods and causal methods are absent from the supplied document.

Analytically, a statute-to-practice comparison is followed by a fund-eligibility analysis and a programme-stage assessment. The first considers the distribution of authority among provincial institutions and religious oversight bodies. The second asks whether a proposed expenditure is a lawful use of zakat, infaq or waqf as distinct fund classes. The third maps the intervention to preparedness, immediate response, early recovery or longer-run mitigation. Lastly, the four-part test is applied to the evidence and converted into measurable governance proposals. The objective is analytical transferability to similarly regulated Islamic social-finance bodies, not statistical generalisation from a single provincial institution.

This research design has limits. It cannot identify whether a specific household received an inappropriate grant, whether BMA exceeded a statutory deadline, whether an audit was qualified on the relevant account, or whether recipient income would have changed absent BMA assistance. The manuscript also does not contain a systematic dataset of flood and landslide incidents for each year between 2020 and 2024. A claim of an increasing disaster trend would require a consistent event series and a stated definition of disaster occurrence. The discussion therefore starts from the established need to govern recurring hazards, rather than asserting a quantified trend that the present materials do not substantiate.

⁷ Badan Pengelolaan Keuangan Aceh, "Laporan Keuangan Pemerintah Aceh Tahun Anggaran 2023: Catatan atas Laporan Keuangan (Audited)," sec. 3.4, 44, https://bpka.acehprov.go.id/media/2024.07/calk_audited_2023a_c1.pdf.

The Legal Architecture of Islamic Social Finance in Aceh

Indonesia's constitutional and statutory structure permits Aceh to exercise special institutional arrangements within the Republic. Law No. 11 of 2006 expressly provides a basis for the regional administration of zakat, including its position in Aceh's own-source revenue arrangements. Such provisions are legally significant because they situate collection and expenditure inside governmental systems instead of relying exclusively on voluntary private charitable networks.⁸ Yet the fiscal label must not obscure the source-dependent character of zakat. For Islamic law, eligibility is governed fundamentally by the eight categories identified in Qur'an 9:60. A classification as regional revenue does not make zakat fungible with ordinary taxes or authorise its unqualified use for any bridge, road or administrative expense.

This distinction requires two simultaneous controls. Public finance law asks whether receipts, bank accounts, budget approvals, transfers and reports are treated in accordance with applicable regional rules. Islamic law asks whether the beneficiary and the disbursement purpose meet the distribution requirements for the particular fund. An expenditure could be administratively well recorded yet ineligible under a restricted religious source; conversely, a substantively deserving beneficiary might be served through a process that violates record-keeping or procurement obligations. Responsible governance requires satisfaction of both tests, not a presumption that satisfying one automatically satisfies the other.

Aceh Qanun No. 10 of 2018 already provided an extensive framework for Baitul Mal covering zakat, infaq, waqf, other religious assets, organisation and accountability. The original paper sometimes implies that the 2021 amendment first brought waqf into the institution's legal remit. That reading is inconsistent with the scope of the 2018 legislation. Qanun No. 3 of 2021 should instead be understood as an amending instrument that revised selected definitions, institutional arrangements, professional personnel and

⁸ Republic of Indonesia, Law No. 11 of 2006 on the Governing of Aceh (Undang-Undang Nomor 11 Tahun 2006 tentang Pemerintahan Aceh), arts. 180(1)(d) and 191.

provisions concerning management and use of funds.⁹ This is more than a technical correction: attributing a power to the wrong instrument can produce misleading claims about institutional innovation and post-reform performance.

The legal status of the funds also makes the description “alternative disaster budget” imprecise. Zakat is constrained by designated recipient classes; infaq depends on its governing conditions and any donor restrictions; waqf requires preservation and lawful management of endowed assets and purposes. The relative flexibility of one class of infaq cannot be transposed to another donor-restricted allocation without examining the relevant instruction. Likewise, waqf capital cannot simply be converted into an emergency cash pool. Each instrument may support resilience, but through different entitlement, asset and temporal logics. Fund segregation is consequently a substantive element of Islamic economic law, not merely a convenient accounting preference.

The institutional architecture should be described with precision. The original manuscript sometimes calls the relevant actor a Dewan Pengawas Syariah (DPS), an expression commonly used in regulated Islamic financial institutions, while elsewhere it identifies Baitul Mal’s own governing and supervisory organs. The applicable Qanun refers to bodies within the Baitul Mal framework, including the Dewan Pertimbangan Syariah and Dewan Pengawas, whose roles should be read directly from the revised statutory text rather than inferred from banking structure.¹⁰ Majelis Permusyawaratan Ulama (MPU), moreover, has a broader religious-advisory role and should not be described as the operational body that alone declares a disaster emergency or authorises every individual BMA payment.

This clarification matters for administrative legitimacy. The formal declaration or handling of disaster conditions falls within the statutory disaster-governance framework, while zakat eligibility and institutional distribution decisions require the relevant Baitul Mal procedures. The

⁹ Government of Aceh, Qanun Aceh No. 10 of 2018 on Baitul Mal (Qanun Aceh Nomor 10 Tahun 2018 tentang Baitul Mal), promulgated January 4, 2019, <https://peraturan.bpk.go.id/Details/102327/qanun-prov-nad-no-10-tahun-2018>.

¹⁰ Government of Aceh, Qanun Aceh No. 3 of 2021 Amending Qanun Aceh No. 10 of 2018 on Baitul Mal (Qanun Aceh Nomor 3 Tahun 2021 tentang Perubahan atas Qanun Aceh Nomor 10 Tahun 2018 tentang Baitul Mal), promulgated January 18, 2022, <https://peraturan.bpk.go.id/Details/351942/qanun-prov-nad-no-3-tahun-2021>.

functions may cooperate, but they are not interchangeable. A disaster-management authority can identify affected areas and urgent needs; a Baitul Mal unit can establish an applicant's eligibility under its applicable fund rules; a supervisory mechanism can assess compliance; and financial officers can maintain payment evidence. The resulting separation of functions reduces both undue delay and the risk of funds being spent beyond their lawful purpose.

Governor of Aceh Regulation No. 8 of 2022 supplies technical provisions on zakat and infaq administration. It includes rules connected to monitoring, evaluation and the possible handling of a beneficiary's financial difficulties after disaster. Its content shows that post-shock situations may already be recognised within programme administration, rather than requiring the invention of a wholly separate emergency jurisdiction.¹¹ A contemporary institutional model should assemble these existing competences into a standing disaster-response protocol: pre-approved fund categories, a clear eligibility route, documented delegated authority, coordination with the official disaster agency, and rapid retrospective audit. Speed is best secured through rules designed in advance, not through a claim that emergency conditions nullify oversight.

Law No. 24 of 2007 locates disaster-management responsibility within a public framework of preparedness, emergency response, rehabilitation and reconstruction. BMA's social-finance functions must be placed alongside, rather than treated as a substitute for, those duties.¹² The principle of additionality provides a practical boundary. A zakat-funded intervention should meet a lawful beneficiary need that ordinary mechanisms have not adequately met, or complement a public programme without paying twice for the same item. This does not imply that BMA expenditure can occur only after a governmental programme fails. It means that policy coordination must identify a specific gap, record which institution is responsible for what, and prevent double counting of assistance.

¹¹ Governor of Aceh, Regulation No. 8 of 2022 on the Management of Zakat and Infaq (Peraturan Gubernur Aceh Nomor 8 Tahun 2022 tentang Pengelolaan Zakat dan Infak), https://baitulmal.acehprov.go.id/media/2024.07/2022_peraturan_gubernur_8_tahun_2022_pengelolaan_zakat_infak1.pdf.

¹² Republic of Indonesia, Law No. 24 of 2007 on Disaster Management (Undang-Undang Nomor 24 Tahun 2007 tentang Penanggulangan Bencana).

Consider a household after a serious flood. The disaster-management agency may arrange evacuation and collective shelter; health services may address immediate treatment; social assistance may cover essential food; and BMA may lawfully support an eligible household whose income-producing inventory has been destroyed. If the same family receives two programmes, this is not necessarily improper: one may meet immediate consumption and another restore a livelihood. Impropriety arises when duplicative payments finance precisely the same approved claim without disclosure or when restricted religious money is diverted to an ineligible public expenditure. Clear institutional referrals allow a plural support system to be complementary rather than fragmented.

Islamic Legal Reasoning: From Disaster Victimhood to Zakat Entitlement

The Qur'anic framework for zakat is distributive rather than a general emergency-finance authorisation. Qur'an 9:60 names the eligible categories, including the poor (*fuqara'*), needy (*masakin*), indebted (*gharimin*) and stranded traveller (*ibn al-sabil*). A flood, landslide or fire may result in circumstances that make an individual fall within one of these categories, but “disaster victim” is not itself an independently named ninth class. The legal inquiry is how the shock changes the person's financial capacity and the particular grounds for receiving zakat. This distinction is especially important when a relatively wealthy property holder sustains a loss but retains ample means, while a low-income renter loses the resources needed for daily survival.

Under this approach, assessment of faqir and miskin status centres on need and access to sufficient resources. If a household's earnings cease because flooding destroys the workplace, short-term eligibility may arise even if the household previously maintained itself without assistance. Gharimin presents an additional interpretive challenge because contemporary hardship may involve urgent liabilities, debt incurred to secure necessities or severe unexpected burdens. The specific juristic rationale must be articulated: the presence of property damage alone is not a sufficient explanation for placing every victim in this class. Broad but unreasoned categorisation risks diluting the rights of other eligible groups and undermining public confidence in fiqh-based administration.

The BMA's own published account describes its practical treatment of gharimin as extending to persons hit by unforeseeable calamities; it reports 2022 expenditure of approximately IDR 2.921 billion for 795 recipients affected by events including fires, landslides and earthquakes.¹³ This is valuable evidence that the institution has operationalised a disaster-linked interpretation. It does not establish that every recipient was affected by a hydrometeorological event, that all payments met an independently reviewed eligibility standard, or that recipients subsequently became more resilient. A more careful conclusion is that published practice demonstrates an administrative channel through which particular sudden-loss cases can be considered under gharimin, subject to the controlling religious and provincial rules.

The category of ibn al-sabil also demands restraint. Travel interrupted by an emergency may produce a legitimate need for assistance to a stranded traveller, including transport or immediate subsistence in circumstances recognised by applicable fiqh. But a person receiving treatment away from home cannot automatically be allocated to ibn al-sabil without considering the legal characteristics of the claim. In an international journal, naming the relevant asnaf without explaining the status criteria is not a satisfactory legal argument. The practical objective should be a written eligibility matrix, supported by reasoned decisions and periodic review of borderline cases.

Hifẓ al-nafs (protection of life), *hifẓ al-mal* (protection of property or economic resources), and the broader imperative to avert preventable harm furnish an ethical explanation for mobilising resources quickly after shocks. Nevertheless, *maqasid al-shari'ah* should not operate as a device for bypassing clear beneficiary restrictions. The purposes of law guide interpretation where genuine scope exists; they do not automatically erase text-specific allocation obligations. Modern *maqasid* scholarship frames public benefit as a disciplined interpretive orientation, while insisting that institutional ethical commitments be translated into accountable practice.¹⁴ In the case of zakat, a strong *maqasid* argument begins by showing that a

¹³ Baitul Mal Aceh, "Praktik Penyaluran dan Inovasi Program Asnaf Gharimin," official institutional news, accessed October 10, 2026, <https://baitulmal.acehprov.go.id/berita/kategori/pemberdayaan/praktik-penyalaran-dan-inovasi-program-asnaf-gharimin>.

¹⁴ Mohammad Hashim Kamali, *Maqasid al-Shari'ah Made Simple* (London: International Institute of Islamic Thought, 2008), <https://doi.org/10.2307/j.ctvkc67vz>.

beneficiary meets a lawful class and then explains how the proposed grant secures life, livelihood or the continuity of essential welfare.

The distinction between necessity and convenience is central. A temporary shortage of inventory may justify a modest, targeted asset-replacement grant to an impoverished trader, especially where the grant prevents long-term dependence. That does not mean any expenditure labelled “productive” is lawful from zakat; it remains necessary to examine ownership, transfer, beneficiary status and programme safeguards. The principle of proportionality asks whether the amount, form and duration of support match the identified need. In a resource-constrained province, this is also a question of justice between recipients who are visible after a disaster and those experiencing persistent poverty outside the disaster zone.

The Majelis Ulama Indonesia’s Fatwa No. 23 of 2020 addressed the use of zakat, infaq and sadaqah in responding to the COVID-19 outbreak and its consequences. It supplies an important example of emergency-sensitive reasoning, including the use of religious assets subject to eligibility requirements. Its subject matter is expressly the pandemic, however; it cannot simply be cited as an automatic and unlimited licence for all hydrometeorological expenditure.¹⁵ Analogical reasoning may be persuasive when the underlying need and legal rationale are sufficiently similar, but the article must state that it is drawing an analogy rather than asserting an explicit fatwa rule for floods and landslides.

Infaq and voluntary sadaqah can provide a separate route for activities that are hard to fit into the individually restricted zakat categories, subject to applicable donor or statutory conditions. Examples may include emergency water provision, community kitchens, shared evacuation amenities and equipment supporting vulnerable populations. When an infrastructure intervention benefits a mixed community rather than an identifiable mustahik, the funding source and relevant instructions are particularly important. A well-designed programme therefore begins with an expenditure-to-fund classification, not with a decision to spend followed by an attempt to find a compatible religious label.

¹⁵ Majelis Ulama Indonesia, Fatwa No. 23 of 2020 on the Utilisation of Zakat, Infaq and Sadaqah for the Response to the COVID-19 Outbreak and Its Effects (Fatwa MUI Nomor 23 Tahun 2020), April 16, 2020, <https://mirror.mui.or.id/produk/fatwa/27990/pemanfaatan-harta-zakat-infak-dan-shadaqah-untuk-penanggulangan-wabah-covid-19-dan-dampaknya/>.

Waqf poses a distinct question. A proposed “disaster endowment” may be attractive because its recurring yields could support long-term preparedness, but it is not an existing ring-fenced disaster fund merely because a policy paper suggests it. Establishing such an instrument would require compliance with the law of waqf, the donor’s intentions, asset-management obligations, governance controls and a realistic financial model. Principal preservation, investment risk and the permitted distribution of proceeds must be specified before any forecast of humanitarian benefits is presented. For now, a waqf-backed facility is a prospective policy option rather than an empirically demonstrated innovation by BMA.

Disaster Management Stages and the Comparative Advantage of Social Finance

The vocabulary of “disaster mitigation” is often used loosely to describe relief after a flood. A more discriminating analysis uses the four priorities of the Sendai Framework: risk knowledge, governance, resilience investment and preparedness or recovery.¹⁶ Emergency food distribution is a response activity. Replacement of a productive asset is generally a recovery measure. A future-proofing programme that relocates a repeatedly flooded workshop, improves a safe evacuation route or reduces exposure to recurring hazards may contribute to mitigation, but only if the intervention’s risk-reduction design and effects can be demonstrated. These distinctions matter because different performance indicators correspond to different public purposes.

At the preparedness stage, BMA could contribute through pre-agreed eligibility and referral arrangements, programme-level contingency planning, accessible information to potential claimants and training for caseworkers in distinguishing zakat from infaq. Such institutional preparation is often relatively inexpensive and can reduce delays. But it should be supported through the appropriate operational resources rather than charging all administration indiscriminately to zakat. Before a disaster occurs, memoranda of coordination can identify emergency contact persons,

¹⁶ United Nations Office for Disaster Risk Reduction (UNDRR), Sendai Framework for Disaster Risk Reduction 2015–2030 (Geneva: UNDRR, 2015), priorities 1–4, <https://www.undrr.org/publication/sendai-framework-disaster-risk-reduction-2015-2030>.

standards for sharing recipient data, common definitions of damaged productive assets and a procedure for fast but reviewable religious-eligibility rulings.

During emergency response, BMA's comparative advantage may lie in its proximity to vulnerable households and its established distribution networks. A small, rapidly verified grant can meet needs not covered by bulk relief: medication, essential mobility, a temporary shelter expense or a family's immediate means of earning. The programme should distinguish unconditional urgent grants from more complex livelihood investments that require field assessment. One administrative mistake is to impose the same extensive paperwork on all claims; another is to remove verification entirely whenever a disaster occurs. A tiered response is more defensible: simplified initial identification for life-sustaining help, followed by documented review for larger or asset-specific transfers.

Early recovery is the stage at which Islamic social finance can most clearly contribute to preventing a temporary shock from turning into sustained poverty. Supporting an eligible microenterprise may involve replacement equipment, seeds, tools or very small working-capital grants, accompanied by technical assistance. Yet transfer of a productive asset should not be equated mechanically with income growth. The causal pathway includes the availability of markets, roads, customers, labour, viable business demand and the absence of repeated flooding. Where these conditions remain absent, a grant may be socially necessary even though it cannot independently restore livelihoods. Evaluation should examine restoration of activity, household income stability and subsequent need for assistance, not only the number of transfers completed.

Longer-term mitigation requires still more careful legal and practical screening. Certain protective projects may be better funded through general governmental budgets or donor-permitted infaq rather than restricted zakat. Permanent relocation, drainage works, embankments and communal infrastructure involve land tenure, maintenance and public procurement issues that a welfare body should not assume without competence. The role of BMA may be to identify vulnerability, refer problems to the responsible technical institutions, and assist poor households in participating in risk-reducing recovery programmes. Such an approach respects institutional

specialisation and prevents the ambition to be useful from becoming a claim of unlimited jurisdiction.

This stage-sensitive assessment revises the source manuscript's overall conclusion. Its examples chiefly concern emergency aid and socioeconomic recovery, with some proposals for future digital governance. They support the proposition that Islamic social finance can contribute to disaster-related welfare, but they do not yet support a causal finding that BMA achieved hydrometeorological hazard mitigation during 2020–2024. To make that stronger claim, a future study would need exposure measures, hazard maps, follow-up periods, and outcome indicators comparing recipients with a defensible counterfactual or baseline.

Assessing the Financial Evidence without Overstatement

The audited 2023 Aceh financial statements provide an unusually useful public baseline. They record collected zakat and infaq of approximately IDR 89.626 billion, comprising IDR 62.572 billion in zakat and IDR 27.055 billion in infaq. They also record a 2023 zakat expenditure appropriation of approximately IDR 112.128 billion and actual zakat disbursement of approximately IDR 84.328 billion, or 75.21 percent of the appropriated amount.¹⁷ These are not contradictory figures: one concerns current-year receipts from two fund classes, while another concerns actual payments against a zakat budget that may involve opening balances and other accounting relationships. Any valid ratio must keep the numerator, denominator, fund type and financial period consistent.

The same official record reports actual 2023 distribution through the recognised asnaf, with the largest identified amounts under miskin and ibn al-sabil. It lists approximately IDR 2.391 billion under gharimin in the relevant programme table.¹⁸ This latter amount is an accounting entry for a recipient category, not a clean measurement of hydrometeorological

¹⁷ Badan Pengelolaan Keuangan Aceh, "Laporan Keuangan Pemerintah Aceh Tahun Anggaran 2023: Catatan atas Laporan Keuangan (Audited)," sec. 3.4, 44, https://bpka.acehprov.go.id/media/2024.07/calk_audited_2023a_c1.pdf.

¹⁸ Badan Pengelolaan Keuangan Aceh, "Laporan Keuangan Pemerintah Aceh Tahun Anggaran 2023: Catatan atas Laporan Keuangan (Audited)," sec. 3.4, 44, https://bpka.acehprov.go.id/media/2024.07/calk_audited_2023a_c1.pdf.

assistance. Since the category can encompass hardship and sudden-loss cases beyond floods or landslides, interpreting its entire annual spending as disaster expenditure would introduce category error. To estimate disaster-specific spending, BMA would need programme codes or recipient-level records linked to verified disaster events.

The official 2024 budget-realisation statement for the BMA Secretariat records realised regional revenue of IDR 95,534,615,955.83 in its 2024 column.¹⁹ A March 2025 news account referring to a BMA annual report instead places combined 2024 collection at IDR 95,539,615,955.83 and reported distribution at approximately IDR 89.464 billion; it describes a 46 percent rise in distributions relative to 2023.²⁰ The discrepancy of IDR 5 million between the two collection figures is small relative to the total but meaningful for source reliability. Moreover, the budget-realisation statement covers categories of expenditure that are not automatically identical to zakat-and-infaq distributions. These figures should not be combined mechanically without reconciling the accounting scope, fund classes and original statements. The purpose of a journal article is not to eliminate imperfect records but to explain how differences in documentation constrain interpretation.

The source manuscript also advances a 2021 calculation by subtracting a reported IDR 78.7 billion distributed from IDR 122.1 billion collected and calling the difference a possible sisa lebih pembiayaan anggaran (SiLPA). That arithmetic is not sufficient to identify a formal fiscal closing balance. SiLPA is a defined accounting outcome, not simply any gap between two figures gathered from public statements on different dates. It may be affected by opening fund balances, earmarked amounts, budget categories and reporting cut-offs. Because the underlying 2021 source and reconciliation are not supplied, this article does not repeat the resulting IDR 43.4 billion estimate as a verified SiLPA figure.

The audited 2023 report contains year-end balances attributed to zakat and infaq. Their existence poses legitimate governance questions: what

¹⁹ Sekretariat Baitul Mal Aceh, “Laporan Realisasi Anggaran Pendapatan dan Belanja untuk Tahun yang Berakhir sampai dengan Desember 2024 dan 2023” (official 2024 budget-realisation statement), https://www.baitulmal.acehprov.go.id/media/2026.05/lra_bma_20241.pdf.

²⁰ “BMA Catat Total Pengumpulan Rp95,53 Miliar, Penyaluran Tumbuh 46% di 2024,” MeuligoeAceh.com, March 3, 2025, reporting BMA’s 2024 annual figures, <https://www.meuligoeaceh.com/2025/03/bma-catat-total-pengumpulan-rp-9553.html>.

proportions reflect earmarked commitments, planned expenditure, delayed verification, continuing assistance or unspent allocations? Yet their mere presence does not prove unlawful withholding. A legally defensible study must locate the accounting balance within the governing qanun, the relevant programme rules and any religious constraints about prompt distribution.²¹ For an institution with unpredictable emergency caseloads, the tension between readiness and timely distribution is real, but the legal answer cannot be derived from an uncontextualised percentage.

An appropriate response is transparent balance classification. Public reports should distinguish cash available for immediate eligible distribution, commitments already approved, legally earmarked allocations, funds awaiting documentation, and amounts whose designation is subject to religious or administrative review. Where a contingency mechanism is lawful, it should identify funding source, trigger conditions, maximum duration, approval authority and disclosure rules. Without these categories, even a relatively strong aggregate annual report leaves beneficiaries and researchers uncertain whether liquidity is being held prudently or simply not being allocated. Such a disclosure regime would also strengthen the accountability of donor-restricted infaq.

The evidence supports a further correction of the original article's performance language. A larger amount collected is an indicator of financial scale, not itself proof of public trust, because wage arrangements, mandatory collections, institutional coverage and accounting classifications may change. A larger distribution is a measure of financial activity, not by itself a demonstration of beneficiary welfare. Even beneficiary satisfaction cannot serve as a substitute for longer-run economic indicators. Claims that BMA directly reduced the poverty rate or raised 70 percent of microenterprise beneficiaries' income need a documented evaluation, a comparison period and protection against other confounding policies and changes in regional economic conditions.

The revised evidence register distinguishes what is securely documented from what needs corroboration. This is not an attempt to diminish the policy relevance of BMA. It is a method of preserving the value of its innovations

²¹ Badan Pengelolaan Keuangan Aceh, "Laporan Keuangan Pemerintah Aceh Tahun Anggaran 2023: Catatan atas Laporan Keuangan (Audited)," sec. 3.4, 44, https://bpka.acehprov.go.id/media/2024.07/calk_audited_2023a_c1.pdf.

against evidentiary overreach. The existence of an announced disaster programme, an actual asnaf expenditure and a digital-verification initiative all matter. They answer different questions, however: whether a legal route exists, whether funds were reported as spent and whether institutional information-sharing was planned. None answers, without further data, the separate question of how many households avoided later disaster-related poverty.

Table 1. Evidence classification and limits of inference

Evidence	What the record supports	What it cannot establish
BMA 2022 gharimin account	IDR 2.921 billion in reported 2022 allocations to 795 sudden-loss recipients	All recipients suffered floods; measurable long-term resilience
Audited 2023 Aceh accounts	Zakat/infaq receipts of IDR 89.626 billion; realised zakat spending of IDR 84.328 billion	Disaster-specific total or causal welfare effect
2024 LRA and published news	Secretariat LRA: IDR 95.535 billion revenue; news: IDR 95.540 billion collections	Equivalence of measures, exact distribution and source of IDR 5 million difference
Sijahtra information release, Aug. 2024	Institutional plan and prototype timetable for beneficiary integration	Completed deployment or independently measured error reduction
Underlying manuscript impact figures	Research hypotheses and questions for future evaluation	Verified six-percent potential ratio, income impact or poverty causation

The Practice of Gharimin Assistance and Its Governance Implications

BMA’s description of its gharimin practice is especially important because it demonstrates how a potentially contested juristic category becomes an administrative programme. Its published account connects extraordinary hardship with assistance to recipients affected by fires, landslides and other sudden events, and describes field verification by

officials when determining grant size.²² The analysis should recognise both the innovation and the limits. Evidence of an established programme refutes the suggestion that disaster assistance is merely speculative. But a public description does not disclose every individual eligibility file, caseworker decision, transfer method or subsequent outcome.

A robust eligibility process for post-disaster gharimin would require four steps. First, an applicant's sudden financial burden must be documented through a reasonable combination of local verification, credible witness statements, official event records or material-loss estimates. Second, the decision should explain why the person falls under gharimin rather than another asnaf. Third, grant amount and modality should correspond to the need and any existing assistance, applying proportionality. Fourth, the recipient must receive a simple explanation of the decision and an accessible means to request correction when relevant information was missed. Such safeguards make fiqh interpretation reviewable instead of merely discretionary.

Field verification should be risk-based. A small emergency payment to secure food or travel may warrant expedited procedures; an asset-replacement grant for a substantially higher sum may require an inventory and documentary checks. This is compatible with Islamic ideas of trust and the prevention of harm. It also guards against under-inclusion, a recurrent problem when displaced people lack identity documents or lose paperwork. The purpose of identity checking is to determine legitimate entitlement, not to exclude the people most harmed by the disaster because they cannot immediately produce a particular form.

There is a danger that gharimin becomes an elastic category under which all difficult administrative cases are filed. This would blur religious limits and weaken comparable treatment of claimants across districts. A published eligibility memorandum, approved through the relevant Baitul Mal institutional process, should therefore spell out paradigmatic cases, examples requiring referral to faqir or miskin, exclusions, evidence thresholds and exceptional escalation. It should also distinguish natural hazards from other

²² Baitul Mal Aceh, "Praktik Penyaluran dan Inovasi Program Asnaf Gharimin," official institutional news, accessed October 10, 2026, <https://baitulmal.acehprov.go.id/berita/kategori/pemberdayaan/praktik-penyalaran-dan-inovasi-program-asnaf-gharimin>.

forms of loss where relevant to the programme. A reasoned classification policy allows flexibility where warranted while safeguarding rights of the different Qur'anic beneficiary classes.

Digital Governance, Beneficiary Integrity and Data Rights

The uploaded manuscript correctly identifies beneficiary data as a strategic weakness. Repeated social assistance can be undermined by duplicate records, outdated household circumstances, weak coordination, inaccessible appeal procedures and inconsistent identification methods. Yet technological centralisation is not automatically an answer. A shared database can improve administrative accuracy while also creating risks of erroneous matches, exclusion, unauthorised reuse of personal information and overbroad access to household vulnerability records. Islamic economic law's concern for dignity and the prevention of harm supports a governance approach in which improved targeting and personal-data safeguards are pursued together.

An official public-information report from August 2024 records BMA's engagement with Aceh's communications and information office to discuss the Sijahtra platform. The proposal was to harmonise information from social-assistance providers and facilitate verification of prospective beneficiaries. Importantly, the report described a prototype and future steps; it should not be rewritten as proof that an integrated system was fully implemented, accurate and producing measurable improvements by the end of 2024.²³ A distinction between announcement, pilot, operation and audited outcome is essential in any mature assessment of digital government.

The practical architecture should combine a unique but privacy-conscious beneficiary reference, an event identifier for specific disasters, and programme-level codes distinguishing zakat, infaq and other permissible funding. Officers should be able to record a household's eligibility basis and assistance received without exposing unrelated sensitive information to all

²³ Dialeksis, "Benahi Database, Baitul Mal Aceh Gandeng Diskominsa untuk Sosialisasi Aplikasi Sijahtra," August 2, 2024, reporting the official Sijahtra briefing, <https://ns1.dialeksis.com/aceh/benahi-database-baitul-mal-aceh-gandeng-diskominsa-untuk-sosialisasi-aplikasi-sijahtra/>

partner institutions. Role-based access, audit logs, correction mechanisms and periodic data validation are at least as important as software procurement. Where digital access is unavailable after a flood, offline intake and later synchronisation must remain possible; otherwise the verification system risks excluding the displaced precisely when public assistance is most needed.

A mature digital system would also facilitate additionality. If a household has obtained temporary shelter from a disaster agency, BMA can direct a lawful award toward a different unmet need rather than cancelling aid automatically. Referrals should therefore distinguish functional needs, not simply mark a person as “already assisted.” The database should not assume that receipt of one item eliminates eligibility for another. This calls for data-sharing agreements that define the purpose and duration of transfer, restrict access and preserve the discretion needed to respond to exceptional household circumstances.

The policy challenge is institutional rather than merely technological. Clear legal authority and programme definitions must precede data exchange. Religious-eligibility decisions require human explanation and contestability. Periodic independent review should test inclusion and exclusion errors through sampled case files instead of treating the absence of software duplication alerts as proof of fairness. Without these controls, digitisation may accelerate distribution while reproducing invisible bias. With them, it can help BMA document why a vulnerable household was selected, when the decision was made and what practical outcome followed.

A Four-Part Governance Model for Accountable Disaster Finance

The first component of the proposed model is eligibility. Before transferring funds, the responsible unit records the fund class, the applicable zakat category if relevant, any donor or waqf constraints, the household’s documented need and the institutional officer responsible for the decision. Eligibility can be confirmed on an accelerated basis in genuine emergencies but should never be presumed solely from physical proximity to a disaster. A written record makes lawful flexibility auditable and allows religious oversight to focus on rules rather than retrospective justification.

The second component is additionality. Every intervention should describe the specific protection gap it fills. This might be emergency food where public supplies are delayed, immediate livelihood costs that fall outside ordinary government programmes, or counselling and financial assistance for newly vulnerable households. Additionality does not demand an exclusive donor or programme; it requires disclosure of relevant existing assistance and a rationale for the new contribution. Clear coordination can prevent waste without denying legitimate layered support. It also avoids political pressure to substitute zakat for ordinary state duties.²⁴

The third component is traceability. The minimum file consists of a decision identifier, assessment date, fund code, recipient or secure beneficiary reference, amount, reasoned eligibility category, transfer confirmation and any appeal or correction. Aggregated reports should distinguish relief from recovery and mitigation, as well as zakat from infaq and waqf-derived proceeds. Independently audited totals can then be connected to verifiable programme entries. Transparency need not mean publishing identifiable beneficiaries' personal information; a sufficiently detailed public summary and confidential case-level audit access can coexist.

The fourth component is resilience. Programmes should state an outcome logically connected to their intervention. An emergency cash payment may be evaluated by delivery time and the recipient's access to basic necessities. A livelihood grant may be evaluated after six and twelve months through business reopening, asset retention, earnings stability and whether a household required repeat emergency help. A genuinely preventive intervention should use risk exposure indicators. Reporting only funds disbursed conflates effort with effect. The Sendai Framework's emphasis on risk reduction and better recovery offers an appropriate comparative vocabulary, while national and Acehnese law continue to determine actual competences and obligations.²⁵

²⁴ Republic of Indonesia, Law No. 24 of 2007 on Disaster Management (Undang-Undang Nomor 24 Tahun 2007 tentang Penanggulangan Bencana).

²⁵ United Nations Office for Disaster Risk Reduction (UNDRR), Sendai Framework for Disaster Risk Reduction 2015–2030 (Geneva: UNDRR, 2015), priorities 1–4, <https://www.undrr.org/publication/sendai-framework-disaster-risk-reduction-2015-2030>.

Table 2. Proposed four-part legal and operational accountability test

Pillar	Required decision	Auditable indicator
Eligibility	Specify the lawful fund source and asnaf or donor condition	Recorded basis, approval and error correction
Additionality	Identify the unmet need and relationship to public assistance	Referral and support-gap record
Traceability	Document assessment, amount, transfer and reconciliation	Fund-coded case number and audit trail
Resilience	Choose response, recovery or risk-reduction outcome	Timeliness, livelihood recovery or exposure measure

This model does not require the creation of a new parallel bureaucracy. Most of its components can be implemented through standard forms, programme manuals, fund segregation, interagency referral and existing audit channels. Where a reform would require new regulatory authority, the relevant Baitul Mal and provincial institutions should initiate that process before implementing it. A separate strategic possibility is to evaluate a waqf-supported long-run resilience programme, but only after feasibility studies establish lawful investment structure, governance responsibilities and additionality. It should not be described as an institutionally adopted endowment unless evidence of establishment becomes available.

Implementation could proceed incrementally. An initial phase would audit existing beneficiary categories and produce an eligibility memorandum for disaster-related cases. A second phase would pilot linked case records in selected districts while maintaining offline application routes and independent appeals. A third phase would integrate routine financial reporting with programme-stage and recipient-outcome classifications. A final evaluation could compare timeliness, error rates, beneficiary welfare and administrative cost before and after reform. This sequence respects BMA's limited administrative capacity while permitting measurable improvements rather than an aspirational technological transformation reported as fact.

Discussion: Islamic Public Finance Beyond the Charity–State Dichotomy

Recent synthesis of Islamic social finance research also distinguishes immediate stabilisation through zakat and voluntary contributions from longer-run community and asset resilience, a separation useful for avoiding unsupported impact claims.²⁶ The case contributes to debates on Islamic social finance by complicating a familiar distinction between voluntary charity and state welfare. BMA operates in a public-law setting but manages resources whose permissible uses are not identical to ordinary public revenue. This structure can provide administrative reach alongside normative commitments to beneficiary justice. It can also create ambiguity about where religious eligibility ends and political or bureaucratic discretion begins. The appropriate response is not to deny the public character of BMA or to dissolve zakat into the general fiscal budget, but to specify the two sources of accountability and the points at which they interact.

The analysis also refines arguments about flexibility. The initial draft treats flexibility largely as the capacity to release money rapidly when the ordinary budget is slow. Speed is important but incomplete. Legal flexibility may also mean the power to classify sudden need under an accepted *asnaf*, use distinct voluntary funds for communal activities, adapt evidence requirements during displacement or approve changes to an eligible recipient's support as circumstances evolve. Each form carries separate authority and control conditions. A research article that specifies these pathways makes a stronger comparative contribution than one that treats "Islamic finance" as a single readily deployable stock of cash.

A further contribution is the separation between social protection and disaster-risk reduction. Redistribution after an event protects consumption and may prevent distress sales of household assets; livelihood grants may facilitate recovery; structural resilience investments seek to reduce exposure or damage from future hazards. These are connected through an economic pathway, but they should be evaluated using different causal claims. Where only expenditure and programme descriptions exist, the appropriate scholarly finding is institutional responsiveness rather than demonstrated

²⁶ Abdallah Mambo Dally, "Islamic Social Financial Instruments and Sustainable Community Development: Evidence Synthesis on Community Resilience," *Journal of Islamic Monetary Economics and Finance* 12, no. 3 (2026), <https://doi.org/10.21098/jimf.v12i3.3063>.

mitigation impact. This is not a minor matter of wording: it determines whether the evidence answers the research question.

The comparative significance of Aceh lies in the presence of a regionally mandated Islamic fund manager that can interact with disaster and welfare institutions. Other Muslim-majority jurisdictions may distribute zakat through different forms of state agencies, religious corporations or nongovernmental organisations. The four-part model is potentially portable because it asks questions applicable in each setting: who is entitled, what gap is filled, how is the transfer proved and what changes for the recipient? Its specific legal implementation is not portable without contextual adaptation. The categories of zakat remain grounded in Islamic law, but fiscal arrangements, privacy law, disaster responsibilities and accountability institutions vary by jurisdiction.

The originality of this reading does not rest on discovering that zakat can alleviate disaster hardship; that proposition is well established in normative discussions. It lies in showing that an international-standard claim about public Islamic finance requires distinguishing the legal permissibility of aid, the administrative architecture that makes it deliverable, and the outcome evidence necessary to establish risk reduction. The article thus offers a structure for future audit research and for policy design. It also demonstrates how an apparently strong documentary case can be improved by narrowing exaggerated claims while deepening the analysis of authority and accountability.

Conclusion

Aceh's Baitul Mal framework creates a distinctive institutional opportunity to mobilise zakat and infaq for the needs of people affected by recurrent hazards. Law No. 11 of 2006, Qanun No. 10 of 2018 and its 2021 amendment situate the institution within a public and religious legal architecture. Published BMA material documents the practical use of gharimin assistance for sudden disaster-related hardship, while official financial statements and public reporting establish the importance of transparent classification of receipts, distributions and remaining balances. Those sources establish institutional capacity and some documented activities; they do not independently prove that BMA reduced Aceh's poverty rate or mitigated hydrometeorological risk during 2020–2024.

The principal doctrinal conclusion is that disaster exposure is not itself an unrestricted zakat entitlement. Assistance must be tied to a justified asnaf where zakat is used, while infaq and waqf are subject to their own rules. The principal institutional conclusion is that rapid delivery is compatible with legality if eligibility decisions, segregation of funds, public financial reporting and supervisory processes are prepared in advance. Digital beneficiary records can improve coordination, but a planned platform is not evidence of completed implementation, and data rights must be protected. Programmes should therefore be evaluated as relief, recovery or mitigation according to their actual objectives and measured results.

The article recommends a staged, restricted-fund governance model based on eligibility, additionality, traceability and resilience. BMA should clarify its disaster-related religious eligibility guidance, standardise case-level records, identify the distinct responsibilities of disaster agencies and Islamic fund managers, preserve review and appeal opportunities, and publish programme-level outcomes without disclosing unnecessary personal information. Future empirical scholarship should obtain beneficiary-level administrative data, verified programme accounts and suitable pre- and post-intervention measures. Such a programme of research would test the promising proposition advanced here: that publicly governed Islamic social finance can make a lawful, transparent and demonstrably valuable contribution to disaster resilience in Aceh.

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