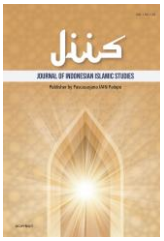
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Distribution of Zakat to the Aṣnāf Fī Sabīlillāh in Da'wah Programs: An Analysis of Dual Compliance at LAZNAS (A Study of Dompet Dhuafa and Baitulmaal Muamalat)

Ahmad Zaki Firdaus[1]✉, Hidayat[2]

[1,2]Institut Ilmu Al-Qur`an, Jakarta

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Abstract

This study examines the distribution of zakat to the aṣnāf fī sabīlillāh through da'wah programs at two national zakat management institutions (LAZNAS), Dompet Dhuafa and Baitulmaal Muamalat, and assesses its conformity with Law Number 23 of 2011 on Zakat Management and Indonesian Council of Ulama (MUI) Fatwa Number 8 of 2011 on Amil Zakat. Using a normative-empirical legal research design with a qualitative case-study approach, data were collected through semi-structured interviews, documentation, and literature review, and analyzed descriptively-analytically using normative and empirical approaches. The results show that both institutions channel zakat to fī sabīlillāh through da'wah programs such as preacher (da'i) cadre-building, mu'allaf coaching, Islamic education, religious outreach, and social empowerment, reflecting a contextual and expanded interpretation of fī sabīlillāh consistent with maqāṣid al-sharī'ah. Both institutions demonstrate dual compliance-shariah compliance and regulatory compliance-although through different governance models: Dompet Dhuafa adopts a specialization strategy with explicit, segmented da'wah programs that ease auditability, while Baitulmaal Muamalat adopts an integrative strategy combining social, educational, and da'wah elements that demands stricter fund segregation and documentation under PSAK 109. The study concludes that both institutions have integrated professional, transparent, and accountable zakat governance, positioning zakat not merely as consumptive aid but as an instrument of da'wah and community empowerment. The findings contribute to the limited empirical literature on institutional-level dual compliance in Indonesian zakat management and offer practical recommendations for regulators, zakat institutions, and Shariah Supervisory Boards.

✉ Email Correspondent:
a.zaki.firdaus@mhs.iiq.ac.id

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Introduction

Indonesia occupies a strategically important position in the global Muslim world as the country with the largest Muslim population, a demographic reality that carries substantial implications for the Islamic economy, particularly in the field of Islamic philanthropy *(Pew Research Center, 2024)*. For every Muslim individual, paying zakat is not merely an act of social generosity but a theologically binding obligation, functioning as a wealth-distribution mechanism that purifies wealth while maintaining social justice *(Sarwat, 2019)*. The Indonesian Ministry of Religious Affairs has estimated the national zakat potential at approximately IDR 327 trillion, reflecting an enormous social capital that remains far from optimally collected *(Kementerian Agama RI, 2025)*. This gap between potential and realized collection underscores the urgency of institutional innovation and regulatory support capable of integrating zakat distribution with sustainable da'wah strategies.

Zakat occupies a strategic and multidimensional position spanning religious, social, economic, and welfare domains *(Ali, 2006)*. Beyond its ritual dimension, zakat functions as a public-policy instrument that touches distributive justice and social welfare *(Chapra, 1992)*. Historically, most classical jurists confined the meaning of *fī sabīlillāh* narrowly to physical jihad or warfare in defense of religion *(Al-Zuhayli, 2007)*. However, contemporary scholarship has expanded this meaning (*tausi'ul ma'na*) to include da'wah activities, the establishment of educational facilities, and efforts to safeguard the faith of the community as modern manifestations of "struggle in the path of Allah" *(Al-Qaradawi, 1999; Ghofur, 2019)*. This reinterpretation has obtained formal legal legitimacy in Indonesia through Law Number 23 of 2011 on Zakat Management, which provides a legal basis for amil zakat institutions to channel zakat funds into programs of strategic da'wah value, provided such distribution remains within the corridor of shariah principles and reaches the rightful *mustahik.* Consequently, the distribution of zakat for da'wah purposes must operate within a framework of *dual compliance*-simultaneous adherence to state regulation and to shariah as elaborated through fatwas of authoritative religious bodies such as the Indonesian Council of Ulama (MUI) *(Suma, 2023)*.

A number of previous studies have addressed the issue of zakat distribution to the *asnaf fī sabīlillāh.* Dipa (2021) examined the contextualization of zakat recipients in the BAZNAS scholarship program through the framework of *maqāṣid al-syarī'ah* and found alignment with the objectives of safeguarding reason and religion, although its role remains limited to the higher education level. Hidayanti et al. (2023) highlighted the use of *fī sabīlillāh* zakat funds for school construction, while Ghofur (2019) and Sahroni (2020) normatively discussed the expansion of the meaning of *fī sabīlillāh* and its implications for the utilization of zakat for da'wah in Indonesia. Nasution (2021) maps out MUI fatwas on zakat in response to contemporary issues, while Parida (2021) examines strategies for training da'is in Dompet Dhuafa's Dai Ambassador program, and Utama and Janah (2024) as well as Astuti et al. (2024) discuss the application of PSAK 109 in zakat collection and distribution institutions.

Although these studies have enriched the normative discourse on the expansion of the meaning of *fī sabīlillāh,* there has been little research that empirically analyzes how large LAZNAS organizations translate the framework of dual compliance—between Sharia mandates and legal regulations—into the operational policies of their da'wah programs, let

alone through a comparative analysis across institutions. This gap is the focus of this study, which analyzes the implementation, Sharia compliance, and regulatory compliance regarding the distribution of zakat to the *asnaf fī sabīlillāh* through da'wah programs at two national-scale LAZNAS organizations—namely, Dompet Dhuafa and Baitulmaal Muamalat (BMM)—while also identifying similarities and differences in their governance models.

Based on the above discussion, this study was designed to answer three questions: (1) how is the zakat distribution program for da'wah implemented at LAZNAS Dompet Dhuafa and Baitulmaal Muamalat; (2) to what extent do these programs comply with the principles of Sharia compliance as stipulated in MUI Fatwa No. 8 of 2011 on Zakat Collectors; and (3) what is the level of compliance of these programs with national regulations, particularly Law No. 23 of 2011 on Zakat Management.

Method

This study is a qualitative legal research project involving document analysis and fieldwork (Marzuki, 2013), which falls under the category of normative-empirical legal research—that is, a study examining how the implementation of legal provisions and official documents actually unfolds in practice as experienced by the community. The approach used is the socio-legal approach, which involves analyzing the content of laws, their philosophical foundations, and the legal rationale underlying the distribution of zakat to the *asnaf fī sabīlillāh.*

Dompet Dhuafa and Baitulmaal Muamalat were selected as the research sites because both are nationally recognized zakat management institutions (LAZNAS) that have established da'wah programs funded through zakat and have developed formal governance mechanisms for zakat distribution. In addition, both institutions represent different organizational approaches in managing zakat-based da'wah activities. Dompet Dhuafa emphasizes a community-based empowerment model through its da'wah and social transformation programs, while Baitulmaal Muamalat adopts a more structured institutional approach that integrates da'wah activities with socio-economic assistance and beneficiary development. These characteristics make the two institutions suitable cases for examining how the principles of dual compliance are implemented in the governance and distribution of zakat to the *aṣnāf fī sabīlillāh.*

The research subject of this study is the practice of zakat distribution for the *aṣnāf fī sabīlillāh* through da'wah programs implemented by LAZNAS Dompet Dhuafa and LAZNAS Baitulmaal Muamalat. Primary data were collected through semi-structured interviews with institutional representatives who were directly involved in the management, implementation, and administration of zakat-funded da'wah programs. Secondary data were obtained from statutory regulations, MUI fatwas, annual reports, institutional documents, organizational publications, and relevant academic literature concerning zakat governance and the interpretation of *aṣnāf fī sabīlillāh.* The use of both primary and secondary sources enabled the study to examine the relationship between normative legal provisions and their implementation in institutional practice.

The interview participants were selected based on their involvement in the planning, management, implementation, reporting, and evaluation of zakat distribution programs within the two institutions. Through their institutional roles, they provided information regarding program design, beneficiary determination, distribution mechanisms,

accountability procedures, and compliance with applicable zakat regulations. Information concerning shariah governance and the supervisory role of the Sharia Supervisory Board (DPS) was further examined through institutional documents, internal policies, annual reports, and explanations provided by the informants. These data were subsequently analyzed to understand how the principles of shariah compliance and regulatory compliance are implemented in the distribution of zakat for da'wah programs.

The unit of analysis in this study is the governance mechanism of zakat distribution to the aṣnāf fī sabīlillāh through da'wah programs implemented by LAZNAS Dompet Dhuafa and LAZNAS Baitulmaal Muamalat. The study does not focus on individual beneficiaries or on measuring the socio-economic impact of specific programs; rather, it examines the institutional processes through which zakat funds are planned, allocated, implemented, supervised, reported, and evaluated within the framework of contemporary zakat governance. Particular attention is given to how both institutions interpret and operationalize the concept of fī sabīlillāh in the context of da'wah activities, including the determination of beneficiary categories, the formulation of program policies, the management of zakat funds, and the implementation of accountability and transparency mechanisms. The analysis further explores how shariah principles are integrated into institutional decision-making and how compliance with national zakat regulations is maintained through organizational policies, reporting systems, and governance practices. Accordingly, the study employs the concept of dual compliance as its analytical framework to examine the extent to which shariah compliance and regulatory compliance are simultaneously reflected in the governance and distribution of zakat for da'wah programs within the two institutions.

Results

Implementation of the Da'wah Program at Dompet Dhuafa

Dompet Dhuafa integrates da'wah as one of its five main program pillars (education, health, economy, social, and da'wah and culture). The da'wah programs carried out include the training and development of da'is through the Dompet Dhuafa Da'i Corps (Cordofa), the Dai Ambassador program for assigning da'is to work abroad, Spiritual Guidance for Patients (BRP) in hospitals, *Muallaf* Islamic Boarding Schools located in ten muallaf communities across Indonesia, Guidance for Prisoners Studying at Islamic Boarding Schools, as well as financial assistance/bisyaroh for Quran teachers in remote areas. In addition, Dompet Dhuafa promotes cultural da'wah through Kampung Silat Jampang, Serambi Budaya, and Suluk Nusantara, as well as Jampang English Village, serving as inclusive and contextually relevant platforms for spreading the message of Islam.

The diversity of da'wah programs implemented by Dompet Dhuafa demonstrates that the institution adopts a transformative approach to zakat utilization under the category of *aṣnāf fī sabīlillāh*. Rather than limiting zakat distribution to conventional religious preaching activities, Dompet Dhuafa integrates da'wah with community empowerment, education, social services, cultural engagement, and the development of religious leadership through programs such as Cordofa, Dai Ambassador, Muallaf Islamic Boarding Schools, and Spiritual Guidance for Patients. This approach reflects an understanding of da'wah as a multidimensional instrument for strengthening both the spiritual and social capacities of Muslim communities (Luthfi, Sodiqin, and Tamtowi, 2026). The institutionalization of these

programs also indicates that zakat is utilized not only to address immediate religious needs but also to support long-term community development through structured and sustainable interventions. Such practices are consistent with contemporary zakat governance models that emphasize the integration of religious objectives, social welfare, and community empowerment within the broader framework of Islamic philanthropy (Susetyo, 2020). Furthermore, the presence of international da'wah initiatives, cultural-based da'wah activities, and programs targeting vulnerable groups such as muallaf communities and prison inmates illustrates the expanding operational scope of *fī sabīlillāh* within modern zakat institutions (Dompet Dhuafa, 2025).

Implementation of the Da'wah Program at Baitulmaal Muamalat

Baitulmaal Muamalat (BMM) promotes a transformative da'wah paradigm that integrates spiritual strengthening with economic empowerment. BMM's da'wah programs include training and mentoring of *da'is* for *mustahiks* in running productive business units, international humanitarian aid for Palestine, emergency medical services through Disaster Hospitals (RSB) in conflict and disaster zones, and scholarships for Islamic education for students. BMM enforces strict administrative discipline by requiring the explicit inclusion of the "Zakat" label on every program funded by zakat funds to maintain the integrity of the agreement between the *muzaki* and the institution.

The implementation of da'wah programs at Baitulmaal Muamalat demonstrates an integrated approach that combines spiritual development with socio-economic empowerment. Rather than viewing da'wah solely as religious instruction, BMM positions it as a mechanism for enhancing the self-reliance and welfare of *mustahiks* through continuous mentoring, capacity building, and productive economic activities. This approach reflects the contemporary tendency of zakat institutions to align religious outreach with broader development objectives, thereby extending the function of da'wah beyond spiritual guidance alone. The inclusion of humanitarian assistance, emergency medical services, and educational support further indicates that BMM interprets *fī sabīlillāh* within a wider framework of public benefit (*maṣlaḥah*), where religious commitment is closely linked to social responsibility and human welfare (Luthfi, Sodiqin, and Tamtowi, 2026). Moreover, the requirement that every zakat-funded program explicitly carries the "Zakat" label illustrates the institution's commitment to accountability, transparency, and the preservation of the trust relationship between *muzaki* and the zakat institution. Such practices are consistent with contemporary principles of zakat governance, which emphasize that institutional legitimacy depends not only on compliance with shariah principles but also on clear administrative procedures and responsible fund management (Susetyo, 2020).

Sharia Compliance with MUI Fatwa No. 8 of 2011

MUI Fatwa No. 8 of 2011 on Zakat Collectors (Amil Zakat) emphasizes that the duties of zakat collectors are not limited to the collection *(jibāyah)* of zakat, but also include the safeguarding *(hifz)* and distribution *(tawzī')* of zakat to the eight categories of recipients *(asnaf)* in accordance with Sharia, including those in the cause of Allah *(asnaf fī sabīlillāh)* (Indonesian Ulema Council, 2011) . The second category of LAZNAS da'wah programs—training of preachers, guidance for new converts, Islamic education, and social

empowerment—normatively meets the criteria of this fatwa because they are oriented toward upholding Islam and the public interest, are carried out by institutionally authorized zakat administrators, and are supervised by the Sharia Supervisory Board (DPS) within each institution.

The compliance demonstrated by both institutions also reflects the contemporary development of zakat governance, in which adherence to sharia principles is assessed not only through the identification of eligible beneficiaries but also through the existence of institutional mechanisms that ensure proper management, supervision, and accountability in the distribution process. In this regard, the role of authorized zakat administrators, internal governance procedures, and sharia supervision contributes to maintaining the legitimacy of zakat-funded da'wah programs under the category of *fī sabīlillāh*. Contemporary studies on zakat governance emphasize that sharia compliance constitutes a fundamental element of good governance because it strengthens legal certainty, public trust, accountability, and the effective utilization of zakat funds in accordance with Islamic legal principles (Kaffah and Susetyo, 2020).

Furthermore, the inclusion of da'i training, guidance for *muallaf*, Islamic education, and community empowerment programs within the *fī sabīlillāh* category illustrates a broader maqāṣid-oriented understanding of zakat distribution. Rather than limiting the category to narrowly defined religious activities, contemporary zakat institutions increasingly interpret *fī sabīlillāh* as encompassing initiatives that promote religious development, social resilience, and public welfare. This approach is consistent with recent scholarship arguing that zakat governance should integrate the objectives of Islamic law (*maqāṣid al-sharīʿah*), accountability, and social benefit in order to achieve sustainable and equitable outcomes for society (Luthfi, Sodiqin, and Tamtowi, 2026).

Compliance with Law No. 23 of 2011

Article 2 of Law No. 23 of 2011 establishes seven principles of zakat management: Islamic law, trustworthiness, public benefit, justice, legal certainty, integration, and accountability, while Articles 25 and 26 stipulate that the distribution of zakat must comply with Islamic Sharia and take into account priority levels, equity, fairness, and regional considerations (Indonesia, 2011). Both LAZNAS institutions demonstrate compliance with these provisions through planning mechanisms (Annual Work Plans and Budgets), reviews by the Sharia Council, the determination of *asnaf* classifications, periodic reporting to BAZNAS and the Ministry of Religious Affairs, and external financial audits by a public accounting firm. Table 1 summarizes the results of the comparative analysis of the two institutions.

The findings indicate that compliance with Law No. 23 of 2011 extends beyond formal legal adherence and functions as an integral component of institutional governance. The implementation of annual planning mechanisms, sharia reviews, beneficiary classification procedures, periodic reporting, and external audits demonstrates how zakat institutions operationalize the principles of accountability, legal certainty, and transparency mandated by the law. These mechanisms contribute to strengthening public trust and institutional legitimacy by ensuring that zakat funds are managed in a systematic and verifiable manner. In the context of contemporary Islamic philanthropy, regulatory compliance serves not only as a legal obligation but also as a governance instrument that

enhances organizational effectiveness and safeguards the interests of both *muzaki* and *mustahik* (Nurrohim and Ubpon, 2026).

Furthermore, the governance practices implemented by both institutions illustrate the increasing convergence between religious accountability and public accountability in modern zakat management. The principles of trustworthiness (*amanah*), justice, public benefit (*maṣlaḥah*), and accountability embodied in Law No. 23 of 2011 are reflected through institutional procedures designed to ensure that zakat distribution remains consistent with both statutory requirements and Islamic ethical values. This finding supports the argument that effective zakat governance requires the integration of regulatory standards and sharia principles within a coherent institutional framework. Such integration is particularly important in strengthening the credibility and sustainability of zakat institutions in responding to contemporary social and economic challenges (Rahman et al., 2025).

In addition, the findings demonstrate that compliance with Law No. 23 of 2011 provides an institutional foundation for the implementation of dual compliance in zakat governance. The planning, supervision, reporting, and auditing mechanisms adopted by both institutions not only fulfill statutory requirements but also support the realization of sharia objectives in zakat distribution. This finding suggests that regulatory compliance and sharia compliance should not be understood as separate dimensions of governance; rather, they operate in a complementary manner to ensure that zakat funds are managed transparently, accountably, and in accordance with Islamic principles. The interaction between these two forms of compliance illustrates how contemporary zakat institutions seek to balance legal legitimacy with religious legitimacy, thereby strengthening public trust and institutional sustainability (Luthfi, Sodiqin, and Tamtowi, 2026; Nurrohim and Ubpon, 2026).

These findings also suggest that the effectiveness of zakat governance depends not only on compliance with formal regulations but also on the institutional capacity to integrate legal, ethical, and religious considerations into operational practices. The experience of Dompet Dhuafa and Baitulmaal Muamalat demonstrates that governance mechanisms such as strategic planning, sharia supervision, financial auditing, and institutional reporting can function as complementary instruments for ensuring both accountability and compliance. This supports the growing scholarly consensus that contemporary zakat institutions require governance frameworks capable of accommodating religious legitimacy and modern accountability standards simultaneously. Consequently, the concept of dual compliance provides a useful analytical lens for understanding how zakat institutions can maintain conformity with Islamic legal principles while responding to increasing demands for transparency, professionalism, and public oversight in the management of charitable funds (Saad et al., 2014; Noor and Pickup, 2017).

Table 1. Comparison of Zakat Distribution Models for Dakwah between Dompet Dhuafa and Baitulmaal Muamalat

Analytical Aspect	Dompet Dhuafa	Baitulmaal Muamalat	Normative Implications
Fiqh Paradigm of fī sabīlillāh	Contemporary fiqh; emphasis on explicit da'wah activities and strengthening religious values	Contemporary fiqh; integration of da'wah into social programs	Both are fiqhically valid; they differ in the operationalization of the maqāṣid of ḥifẓ al-dīn (protection of religion)
Zakat Distribution Model for Da'wah	Specialization and segmentation of da'wah programs	Integrative and holistic (social–educational–da'wah)	The specialized model is easier to assess normatively, while the integrative model offers greater flexibility
Clarity of Asnaf Classification	High; da'wah programs are explicitly classified under fī sabīlillāh	Moderate; classification depends on the intention and design of the program	The clarity of classification affects legal certainty and sharia auditability
Relationship between Funds and Da'wah Objectives	Direct and causal	Indirect	A direct relationship facilitates fiqh justification and regulatory compliance
Sharia Risk Management	Relatively low; program boundaries are clearly defined	Relatively higher when fund segregation is not strictly maintained	Risks can be minimized through strengthening the role of the Dewan Pengawas Syariah (DPS) and internal SOPs
Compliance with Law No. 23/2011	High; facilitates compliance with sharia principles, accountability, and legal certainty	Conditional; depends on fund segregation and documentation	Compliance is structural at Dompet Dhuafa, while it is procedural at Baitulmaal Muamalat
Compliance with PSAK 109	Easier to implement due to the separation of funds and programs	More complex due to the integrative approach	Accounting complexity increases governance requirements
Role of the Sharia Supervisory Board (DPS)	More operational in evaluating da'wah programs	More strategic in assessing intention and fund classification	The DPS plays a crucial role as a guardian of the legitimacy of fī sabīlillāh

Source: Analysis of interview and documentary data, 2026

Discussion

The research findings indicate that the expansion of the meaning of fī sabīlillāh at both LAZNAS organizations is not merely a normative discourse but has been concretely operationalized through measurable da'wah programs. In line with the views of Al-Qaradawi (1999) and Az-Zuhayli (2007) regarding the expansion of the scope of fī sabīlillāh in the post-classical era, both institutions interpret the struggle in the way of Allah as an activity to uphold the word of Allah (li i'lā'i kalimatillāh), which encompasses da'wah, education, and social empowerment. Within the framework of maqāṣid al-syarī'ah, these programs directly contribute to the preservation of religion (ḥifẓ al-dīn) as the primary objective of

sharia, while also addressing the preservation of life, reason, lineage, and the property of the mustahik.

A comparative analysis shows that dual compliance is achieved through two different yet normatively valid governance models. Dompet Dhuafa implements a strategy of specialization and segmentation in its da'wah programs, which establishes a clear causal relationship between zakat funds and religious objectives, thereby facilitating both Sharia compliance verification and regulatory audits. In contrast, Baitulmaal Muamalat employs an integrative strategy that unites social, educational, and da'wah aspects into a single program, offering greater flexibility and adaptability to the multidimensional needs of mustahik, but requires strict fund segregation (segregated reporting) in accordance with PSAK 109 to prevent the commingling of funds (ikhtilāṭ al-amwāl), which could obscure the status of zakat.

This finding both reinforces and expands upon the normative-conceptual studies by Ghofur (2019) and Sahroni (2020) by empirically demonstrating how the expanded meaning of fī sabīlillāh is translated into standard operating procedures, Sharia Council review mechanisms, and a multi-tiered reporting system at the institutional level. These findings also complement Parida's (2021) research on the training of da'is at Dompet Dhuafa by situating it within a broader framework of dual compliance, and address the gap identified by Nasution (2021) regarding the lack of studies on the implementation of MUI zakat fatwas in the practices of specific zakat collection agencies.

The difference in risk profiles between the two institutions—relatively low regulatory risk at Dompet Dhuafa versus higher administrative risk, though offset by program flexibility at Baitulmaal Muamalat—underscores that the effectiveness of dual compliance is not solely determined by the institutions' good intentions, but rather by the consistency of governance systems, the active role of the Sharia Supervisory Board, and the rigor of financial documentation. Thus, the flexible scope for interpreting the asnaf fī sabīlillāh in Articles 25 and 26 of Law No. 23 of 2011 provides leeway for institutional ijtihad, yet remains constrained by the objectives of zakat management set forth in Article 3—namely, improving public welfare and alleviating poverty—without compromising the nature of zakat as an act of worship.

Conclusion

This study concludes that the distribution of zakat to the asnaf fī sabīlillāh through the da'wah programs of LAZNAS Dompet Dhuafa and Baitulmaal Muamalat has generally been in accordance with Law No. 23 of 2011 and MUI Fatwa No. 8 of 2011. Both institutions position da'wah as a strategic component of zakat utilization oriented toward da'wah bil-ḥāl, sharing a commitment to dual compliance but differing in their governance models: a specialized-segmentative approach at Dompet Dhuafa and an integrative-holistic approach at Baitulmaal Muamalat. Both models have proven equally capable of integrating the theological mission of striving in the path of Allah with the sociological mission of empowering the community within a framework of professional, transparent, and accountable zakat governance.

Based on these findings, this study recommends that BAZNAS and the Ministry of Religious Affairs develop more detailed technical guidelines regarding the distribution of zakat to the asnaf fī sabīlillāh in the field of da'wah to minimize variations in interpretation

among institutions. LAZNAS is advised to strengthen its evaluation system based on the spiritual, social, and economic impacts on mustahik, while the Sharia Supervisory Board should be encouraged to play a more strategic role, rather than merely overseeing administrative compliance. Further research is recommended to expand the scope of zakat utilization to include additional beneficiaries and sectors, thereby enriching the empirical understanding of the dynamics of dual compliance in the management of Islamic philanthropy in Indonesia.

This study has several limitations. First, the analysis is limited to two national zakat institutions, namely Dompet Dhuafa and Baitulmaal Muamalat, and therefore the findings cannot be generalized to all zakat management organizations in Indonesia. Second, the study focuses primarily on governance mechanisms, institutional practices, and compliance frameworks related to the distribution of zakat to the aṣnāf fī sabīlillāh, rather than assessing the long-term socio-economic impact of da'wah programs on beneficiaries. Third, the findings are based on interview data, institutional documents, and legal sources available during the research period and do not involve independent financial or shariah audits. Consequently, the conclusions should be understood within the scope of the cases examined and the data available to the researcher.

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