

# Analisis Kebijakan PTM: Draft Validasi Kemenkes

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## Executive Verdict

Paket ini sudah naik dari pilot menjadi **draft technical policy review yang layak dibagikan ke Kemenkes untuk validasi**. Ia belum boleh dibaca sebagai pendapat hukum final atau rekomendasi perubahan kebijakan yang sudah di-costing. Perubahan paling penting adalah dimasukkannya **Permenkes 3/2026 tentang Penanggulangan Penyakit** sebagai current legal anchor pasca-UU 17/2023 dan PP 28/2024, serta pemisahan jelas antara aturan yang dipakai sebagai current authority, legacy/transition evidence, dan konteks pendukung. Untuk aturan obat/trastuzumab, matriks status hukum juga menandai relasi **Permenkes 5/2026** secara terpisah.

Keputusan penggunaan: gunakan laporan ini sebagai paket validasi dengan Kemenkes Biro Hukum, unit teknis P2P, BPJS Kesehatan, dan perwakilan daerah. Jangan mengklaim bahwa semua pasal lama sudah tervalidasi statusnya sebelum exception clauses Permenkes 3/2026 dibaca resmi.

Audit ulang independen memberi verdict konsisten bahwa paket ini **acceptable with caveats** untuk draft validasi teknis: Legal/regulatory: Acceptable with caveats; Evidence/methods/readiness: Acceptable with caveats; Actionability: Acceptable with caveats. Caveat yang tetap melekat adalah legal sign-off, validasi stakeholder, budget impact kuantitatif, dan OCR/manual check untuk dokumen yang ditandai.

## Cakupan Dan Metode

Ini adalah draft analisis kebijakan untuk **Penyakit Tidak Menular (PTM)** dalam korpus Indonesia Health Policy Review. Unit analisisnya adalah active PTM issue queue ditambah anchor hukum terkini Permenkes 3/2026. Analisis memakai taxonomy tagging project, schema PTM yang sudah diperketat melalui reproducibility audit, metadata status/relasi BPK-Kemkes, dan katalog framework **policy-analysis**. Output ini bersifat technical policy review untuk validasi, bukan legal opinion final.

Ukuran	Nilai
Dokumen	34
Chunk	1022
LLM-ready chunks	1022
Estimasi token kasar	817,216
Rentang tahun	1975-2026
Sumber dokumen	BPK (29), Kemkes (5)

Produk policy-analysis yang ditekankan adalah P1 problem framing, P7 actor map, P13 implementation feasibility, P15 monitoring and evaluation, P16 equity, P19/P21 harmonisasi dan desentralisasi Indonesia, serta P22 JKN/BPJS budget fit.

## Temuan Utama

- Permenkes 3/2026 harus menjadi anchor hukum terkini.** Permenkes 3/2026 memberi ruang lingkup PTM, dasar hukum UU 17/2023/PP 28/2024, dan relation scrape Kemkes menunjukkan pencabutan beberapa Permenkes lama yang sebelumnya dipakai sebagai contoh; untuk obat/trastuzumab, matriks juga menandai relasi Permenkes 5/2026. Bukti: kemkes:7186 Pasal 3, kemkes:7186 Konsiderans.
- Regulasi PTM sudah operasional tetapi perlu matrix implementasi.** Deteksi dini, Posbindu, skrining, surveilans, pembinaan/pengawasan, dan M&E muncul lintas instrumen; rekomendasi harus diterjemahkan menjadi owner-platform-indicator-funding. Bukti: bpk:172102 Pasal 23, bpk:269103 Pasal 9, bpk:194972 Pasal 17, kemkes:7186 Pasal 85.
- JKN/APBD fit dapat dipetakan, tetapi belum menjadi budget impact.** Skrining/Prolanis BPJS, restriksi trastuzumab JKN, APBD daerah, dan pendanaan Permenkes 3/2026 memberi peta payer; volume dan unit cost tetap perlu data tambahan. Bukti: bpk:269103 Pasal 12, bpk:311193 Pasal 25, bpk:111925 Pasal 1, kemkes:7186 Pasal 95.
- Equity harus menjadi gate, bukan narasi tambahan.** Perempuan, peserta JKN, pasien penyakit kronis, pekerja, dan kelompok risiko muncul dalam regulasi; tiap opsi perlu PROGRESS-Plus dan financial-protection

pass sebelum disarankan. Bukti: bpk:116060 Pasal 11, bpk:311193 Pasal 25, bpk:150192 Pasal 5, kemkes:7186 Pasal 3.

## Profil Korpus

Route class	Documents
population_ptm_control	11
specialized_facility_governance	10
cancer_control	3
ptm_related_health_system	3
jkn_screening_chronic_care	2
action_plan_strategy	2
chronic_disease_support	2
current_integrated_disease_control_anchor	1

Label group	Top labels
Conditions	general_ptm (500), cardiovascular (334), cancer (146), risk_factor (128), breast_cervical_cancer (76)
Policy functions	governance_coordination (507), community_engagement (298), prevention_promotion (195), financing_resourcing (185), service_delivery_referral (159)
Actors	hospital_fkrtl (406), community_cadres (298), central_government (222), local_government (212), private_sector (187)
Instruments	legal_mandate (530), service_package (382), monitoring_evaluation (223), financing_budget (159), screening_protocol (139)
Equity signals	general_population (291), cancer_patients (186), risk_population_15plus (92), women (75), chronic_disease_patients (54)

Korpus ini bukan korpus pencegahan murni. Isinya mencakup pengendalian PTM populasi, kanker, skrining BPJS/JKN dan chronic care, pembatasan obat, serta tata kelola fasilitas khusus untuk layanan kardiovaskular/kanker. Ini berguna secara analitis karena kebijakan PTM mencakup pencegahan, skrining, perawatan kronis jangka panjang, rujukan spesialis, obat, dan kapasitas fasilitas.

## Legal Status Dan Current Authority

Document	Source status	Interpretation	Current use
kemkes:7186 - Peraturan Menteri Kesehatan Nomor 3 Tahun 2026 tentang Penanggulangan Pe	Berlaku	active_by_source_metadata	Use as current legal anchor for disease-control framing and legal-basis harmonisation.
bpk:323024 - Peraturan Gubernur (Pergub) Provinsi Sulawesi Tenggara Nomor 11 Tahun 20	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.
bpk:312656 - Peraturan Gubernur (Pergub) Provinsi Sulawesi Tenggara Nomor 28 Tahun 20	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.

Document	Source status	Interpretation	Current use
bpk:311193 - Peraturan Badan Penyelenggara Jaminan Sosial Kesehatan Nomor 3 Tahun 202	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.
bpk:303599 - Peraturan Gubernur (Pergub) Provinsi Sulawesi Tenggara Nomor 22 Tahun 20	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.
bpk:303598 - Peraturan Gubernur (Pergub) Provinsi Sulawesi Tenggara Nomor 21 Tahun 20	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.
bpk:269103 - Peraturan Bupati (Perbup) Kabupaten Pesisir Barat Nomor 6 Tahun 2023 ten	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.
bpk:303597 - Peraturan Gubernur (Pergub) Provinsi Sulawesi Tenggara Nomor 20 Tahun 20	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.
bpk:255847 - Peraturan Daerah (Perda) Kabupaten Karawang Nomor 6 Tahun 2022 tentang P	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.
bpk:194972 - Peraturan Gubernur (Pergub) Provinsi Daerah Khusus Ibukota Jakarta Nomor	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.
bpk:278850 - Peraturan Bupati (Perbup) Kabupaten Kuningan Nomor 53 Tahun 2021 tentang	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.
bpk:165166 - Peraturan Walikota (Perwali) Kota Kediri Nomor 53 Tahun 2020 tentang PED	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.
bpk:146531 - Peraturan Bupati (Perbup) Kabupaten Banyuwangi Nomor 26 Tahun 2020 tenta	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.
bpk:127745 - Peraturan Bupati (Perbup) Kabupaten Lima Puluh Kota Nomor 22 Tahun 2019	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.
bpk:262094 - Peraturan Walikota (Perwali) Kota Yogyakarta Nomor 90 Tahun 2019 tentang	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.
bpk:150192 - Peraturan Walikota (Perwali) Kota Batu Nomor 62 Tahun 2019 tentang PEDOM	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.
bpk:127838 - Peraturan Bupati (Perbup) Kabupaten Lima Puluh Kota Nomor 23 Tahun 2019	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.

Document	Source status	Interpretation	Current use
bpk:164222 - Peraturan Bupati (Perbup) Kabupaten Maluku Tenggara Barat Nomor 33 Tahun	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.
bpk:164397 - Peraturan Bupati (Perbup) Kabupaten Pulau Morotai Nomor 54 Tahun 2019 te	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.
bpk:111925 - Peraturan Menteri Kesehatan Nomor 22 Tahun 2018 tentang Petunjuk Teknis	Berlaku	reconciliation_required_later	Legacy/transition evidence only until retained exceptions are verified against the revoking rule.
kemkes:500 - Peraturan Menteri Kesehatan Nomor 22 Tahun 2018 tentang Petunjuk Teknis	Berlaku	reconciliation_required_later	Legacy/transition evidence only until retained exceptions are verified against the revoking rule.
bpk:111968 - Peraturan Menteri Kesehatan Nomor 5 Tahun 2017 tentang Rencana Aksi Nasi	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.
bpk:112083 - Peraturan Menteri Kesehatan Nomor 29 Tahun 2017 tentang Perubahan Atas P	Berlaku	reconciliation_required_later	Legacy/transition evidence only until retained exceptions are verified against the revoking rule.
kemkes:861 - Peraturan Menteri Kesehatan Nomor 5 Tahun 2017 tentang Rencana Aksi Nasi	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.
kemkes:1080 - Peraturan Menteri Kesehatan Nomor 29 Tahun 2017 tentang Perubahan atas P	Berlaku	reconciliation_required_later	Legacy/transition evidence only until retained exceptions are verified against the revoking rule.
bpk:201192 - Peraturan Bupati (Perbup) Kabupaten Blora Nomor 14 Tahun 2016 tentang Pe	Berlaku	active_by_source_metadata	Use for PTM thematic synthesis, subject to status and post-UU 17/2023 compatibility checks.
bpk:172102 - Peraturan Menteri Kesehatan Nomor 71 Tahun 2015 tentang Penanggulangan P	Berlaku	reconciliation_required_later	Legacy/transition evidence only until retained exceptions are verified against the revoking rule.
bpk:116060 - Peraturan Menteri Kesehatan Nomor 34 Tahun 2015 tentang Penanggulangan K	Berlaku	reconciliation_required_later	Legacy/transition evidence only until retained exceptions are verified against the revoking rule.
kemkes:3152 - Peraturan Menteri Kesehatan Nomor 71 Tahun 2015 tentang Penanggulangan P	Berlaku	reconciliation_required_later	Legacy/transition evidence only until retained exceptions are verified against the revoking rule.
bpk:201416 - Peraturan Walikota (Perwali) Kota Sukabumi Nomor 26 Tahun 2014 tentang U	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.

Document	Source status	Interpretation	Current use
bpk:299796 - Peraturan Bupati (Perbup) Kabupaten Semarang Nomor 86 Tahun 2011 tentang	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.
bpk:53939 - Peraturan Pemerintah (PP) Nomor 128 Tahun 2000 tentang Pendirian Perusah	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.
bpk:53932 - Peraturan Pemerintah (PP) Nomor 126 Tahun 2000 tentang Pendirian Perusah	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.
bpk:78497 - Keputusan Presiden (Keppres) Nomor 1 Tahun 1975 tentang Menteri Kesehata	Berlaku	active_by_source_metadata	Use as supporting or adjacent context; do not let this drive core PTM conclusions.

Catatan penting: bila status metadata menyatakan **Berlaku** tetapi relasi Kemkes menunjukkan dicabut oleh Permenkes 3/2026, laporan menandainya sebagai `reconciliation_required_later_kemkes_revocation`. Ini sengaja tidak diubah paksa menjadi **Tidak Berlaku**, karena beberapa relasi memiliki pengecualian pasal/lampiran yang harus dibaca oleh Biro Hukum.

## Assessment Berbasis Framework

Product	Rating	Interpretation
P1 Problem framing audit	Kuat untuk framing regulasi; sedang untuk burden kuantitatif	Problem framing sudah cukup untuk technical policy review; klaim epidemiologis tetap perlu lampiran data burden di luar teks regulasi.
P7 Stakeholder and actor map	Cukup untuk peta aktor awal; perlu validasi posisi aktor	Actor map sudah layak sebagai bahan diskusi Kemenkes; content SNA aktor-aksi-target tetap diperlukan sebelum accountability recommendation final.
P13 Implementation feasibility	Cukup untuk draft implementasi; perlu field validation	Arsitektur operasional dapat diterjemahkan menjadi matriks implementasi; validasi Kemenkes/BPJS/daerah masih diperlukan untuk kapasitas, data flow, dan enforcement.
P15 Monitoring and evaluation	Sedang-kuat untuk sinyal hukum; perlu indikator operasional	Korpus hukum sudah cukup untuk menyusun M&E extraction fields; rekomendasi final harus mengisi baseline, target, cadence, receiving unit, dan consequence.
P16 Equity impact	Sebagian; perlu PROGRESS-Plus validation	Equity dapat dirumuskan sebagai guardrail rekomendasi, tetapi tidak boleh diklaim selesai karena dimensi rural/remote, disabilitas, dan socioeconomic status belum kuat.

Product	Rating	Interpretation
P19/P21 Harmonisation and decentralisation	Meningkat: status matrix tersedia; legal opinion tetap perlu adjudication	Report sudah layak untuk menandai legacy rules dan kebutuhan harmonisasi; keputusan legal final tetap memerlukan pembacaan pasal pengecualian dan validasi legal counsel.
P22 JKN/BPJS and budget fit	Sebagian-kuat untuk mapping payer; lemah untuk costing nominal	Budgetability matrix bisa dibangun dari regulasi; budget impact nominal tetap perlu data volume dan unit cost.

## P1. Problem Framing Dan Evidence Base

[Evident] Aturan PTM nasional menyatakan masalah public health dan logika intervensi: pemerintah dan masyarakat berbagi tanggung jawab pengendalian PTM melalui UKM dan UKP (bpk:172102 Pasal 4). Kriteria prioritas eksplisit mencakup kematian, kecacatan, kesakitan, beban biaya, dan faktor risiko yang dapat diubah (bpk:172102 Pasal 6). [Inferred] Ini memberi problem frame nasional yang koheren, tetapi regulasi lokal sering mengulang logika nasional tanpa pernyataan beban lokal yang terkuantifikasi. Pass ekstraksi berikutnya perlu menilai apakah setiap dokumen memuat prevalensi, mortalitas, disabilitas, biaya, gap layanan, serta distribusi demografis/geografis.

## P7. Actor Dan Coalition Map

[Evident] Arsitektur kebijakan bersifat multi-aktor: pemerintah pusat, pemerintah daerah, Dinas Kesehatan, FKTP/Puskesmas, rumah sakit, BPJS Kesehatan, kader/masyarakat, dan swasta muncul dalam korpus. Pengendalian PTM berbasis komunitas terlihat melalui Posbindu dan Kampung CERDIK (bpk:269103 Pasal 9), sementara BPJS menghubungkan skrining, Prolanis/PRB, pembiayaan, dan sistem informasi (bpk:311193 Pasal 25). [Inferred] Ini menunjukkan koalisi suportif yang luas, tetapi akuntabilitas bergantung pada kejelasan aktor-aksi-target, bukan sekadar penyebutan aktor.

Actor	Category	Power	Position	Docs	Chunks
hospital_fkrtl	provider	medium	supportive	22	406
community_cadres	beneficiary/community	medium	supportive	30	298
central_government	state	high	supportive	32	222
local_government	state	high	supportive	27	212
private_sector	non-state	medium	supportive/conditional	16	187
ministry_of_health	state	high	supportive	20	108
health_workers	provider	medium	supportive	23	91
puskesmas_fktp	state/provider	medium	supportive	18	75
health_office	state	high	supportive	18	70
laboratory	provider	medium	supportive	11	36
bpjs	state purchaser	high	supportive	2	12
pharmacy	provider	low	supportive	4	9

## P13/P15. Implementasi, Monitoring, Dan Learning Loop

[Evident] Beberapa instrumen mengoperasikan pencegahan PTM melalui skrining, deteksi dini, Posbindu, CERDIK, surveilans, pelaporan, pengawasan, dan monitoring tahunan/periodik (bpk:172102 Pasal 23; bpk:269103 Pasal 9; bpk:194972 Pasal 17). [Inferred] Implementasi paling kuat ketika aturan mengidentifikasi platform layanan dan aktor penanggung jawab. Kekuatan ini melemah ketika pembiayaan, staffing, sistem informasi, atau konsekuensi review target hanya tersirat.

## P16. Equity Impact

[Evident] Kelompok sasaran yang relevan untuk equity muncul dalam teks hukum: perempuan dalam pengendalian kanker payudara/leher rahim (bpk:116060 Pasal 11), peserta JKN dan pasien penyakit kronis dalam skrining/Prolanis/PRB BPJS (bpk:311193 Pasal 25), serta pekerja dalam kerja sama promotif/preventif pemerintah-swasta

(bpk:150192 Pasal 5). [Inferred] Equity masih kurang spesifik karena status sosial ekonomi, disabilitas, akses rural/remote, dan hambatan affordability jarang dibuat eksplisit di chunk yang diekstrak.

**P19/P21. Harmonisasi Dan Desentralisasi**

[Evident] Korpus mencakup aturan kementerian/BPJS nasional, PP/Keppres, regulasi provinsi, dan regulasi kabupaten/kota. Sebagian aturan lokal memuat larangan, perizinan, dan kewajiban fasilitas/tenaga kesehatan (bpk:255847 Pasal 64). [Inferred] Tugas legal utama sebelum sintesis publication-grade adalah audit dasar hukum vertikal, terutama untuk dokumen lebih lama yang mendahului UU 17/2023.

**P22. JKN/BPJS Dan Budget Fit**

[Evident] Hubungan PTM-JKN konkret dalam instrumen tertentu: pembiayaan dan sistem informasi skrining/Prolanis/PRB BPJS (bpk:311193 Pasal 25) serta restriksi trastuzumab untuk perawatan kanker dalam JKN (bpk:111925 Pasal 1). [Inferred] Ini tidak menggantikan analisis budgetability APBD/APBN untuk mandat pencegahan dan surveilans PTM berbasis komunitas.

**Policy Gap Matrix**

Gap area	Framework	Status	Priority	Next analysis action
Problem framing dan kuantifikasi beban	P1/P2	Sebagian	Tinggi	Untuk tiap dokumen PTM, ekstrak apakah prevalensi, mortalitas, disabilitas, biaya, geografi, jenis kelamin/usia, dan baseline gap layanan dinyatakan eksplisit.
Costing implementasi dan kecukupan pembiayaan	P14/P22	Sebagian	Tinggi	Hubungkan mandat dengan klausul pembiayaan APBD/APBN/JKN dan buat flag costability: sumber disebut, mata anggaran disebut, jumlah/volume disebut, monitoring disebut.
Targeting equity	P16	Lemah-ke-sebagian	Tinggi	Jalankan equity extraction pass memakai PROGRESS-Plus dan bandingkan sasaran dengan indikator beban PTM dan akses layanan.
Akuntabilitas aktor dan koordinasi	P7/P13/P21	Sedang	Sedang	Bangun content SNA dari triple aktor-aksi-target dan identifikasi accountability edges yang hilang.

Gap area	Framework	Status	Priority	Next analysis action
Monitoring, evaluasi, dan learning loop	P15	Sedang	Sedang	Ekstrak klausul M&E menjadi field indikator, frekuensi, aktor penanggung jawab, penerima laporan, dan konsekuensi.
Harmonisasi vertikal pasca-UU 17/2023	P19/P21	Perlu legal cross-check	Tinggi	Buat tabel ekstraksi dasar hukum dari konsiderans/mengingat dan tandai dokumen yang perlu review harmonisasi pasca-UU 17/2023.

## Policy Options Dan Trade-Off

ID	Issue	Option	Evidence	Trade-off	Readiness
O1	Legal-status reconciliation	Anchor PTM review to Permenkes 3/2026, UU 17/2023, and PP 28/2024; treat older Permenkes 71/2015, 34/2015, and 29/2017 as legacy/transition evidence unless retained exceptions are verified; separately flag Permenkes 5/2026 for medicine-specific legacy status such as trastuzumab.	E13   E14   D01	Requires legal reading of retained exception clauses before asserting exact repeal boundaries.	Ready for Kemenkes validation
O2	Core PTM implementation coherence	Convert prevention, detection, surveillance, reporting, and supervision provisions into a national-local implementation matrix.	E03   E06   E12   E16	May reveal differences between legal mandate and operational capacity that need field verification.	Draft recommendation, needs validation

ID	Issue	Option	Evidence	Trade-off	Readiness
O3	JKN and APBD budgetability	Create a budgetability pass for every PTM mandate: payer, funding source, service volume proxy, unit-cost source, and M&E consequence.	E04   E08   E09   E15	Cannot produce budget impact without volume, unit cost, and tariff/benefit data.	Analytic recommendation ready; costing requires data request
O4	Equity safeguards	Add PROGRESS-Plus and financial-protection checks to PTM screening, chronic care, cancer, and community interventions.	E05   E08   E10   E13	Regulatory text often does not contain disaggregated burden or access data.	Ready as equity review requirement
O5	Accountability and SNA	Extract actor-action-target triples from priority pasal and build a content SNA for accountability, reporting, funding, and sanctions edges.	E01   E07   E08   E16	Needs adjudication because legal verbs and merely mentioned actors can be confused by automated tagging.	Method ready; full run pending

## Recommendation-To-Evidence Traceability

ID	Recommendation	Evidence	Counter-evidence check	Owner	Indicator
R1	Use Permenkes 3/2026 as the current disease-control legal anchor, separately flag Permenkes 5/2026 for medicine-specific legacy status, and clearly label older PTM/kanker/medicine Permenkes as legacy evidence pending exception-clause review.	E13   E14	BPK/Kemkes metadata may still show older rules as Berlaku; matrix flags this as reconciliation_required, not a binary source-status overwrite.	Kemenkes Biro Hukum	All cited legal authorities have verified current/legacy/retained-exception status.

ID	Recommendation	Evidence	Counter-evidence check	Owner	Indicator
R2	Create a PTM implementation matrix covering prevention, risk-factor control, early detection, surveillance, reporting, supervision, sanctions, and financing.	E03   E06   E12   E16	Some local examples are adjacent or pre-2026; use as implementation patterns, not as current national authority.	Kemenkes P2P + Dinas Kesehatan	Each mandate has actor, action, target, reporting recipient, cadence, and consequence fields.
R3	Require budgetability and JKN/APBD fit before recommending scale-up of PTM prevention/screening/chronic-care obligations.	E04   E08   E09   E15	No unit cost, volume, or 5-year budget impact is in the legal text.	Kemenkes planning/finance + BPJS Kesehatan	Mandates classified by payer and costability score before policy change is proposed.
R4	Treat equity as a required review gate for PTM policy options, not as a post-hoc narrative.	E05   E08   E10	Rural/remote, disability, socioeconomic status, and affordability barriers are often not found explicitly.	Kemenkes technical units + BPJS + local governments	Each option has PROGRESS-Plus barrier, entitlement, mitigation, and data-disaggregation fields.

## Implementation, Budgetability, Dan M&E

Workstream	Owner	Platform	Funding route	M&E	Risk
Legal harmonisation	Kemenkes Biro Hukum	JDIH/legal drafting process	Kemenkes internal legal/policy process	Status matrix complete for all cited instruments.	Misstating active legal authority if source metadata and relation text conflict.
Community PTM prevention and detection	Kemenkes P2P + Dinas Kesehatan	Posbindu/CERDIK/PRB/APBD/FKTP	PRB/APBD/FKTP plus other lawful sources where applicable	Coverage, reporting cadence, and supervision fields populated per instrument.	Local rules may not have the same resource base or reporting capacity.
JKN screening and chronic care	BPJS Kesehatan + Kemenkes	FKTP, Prolanis, PRB, BPJS information system	JKN	Prolanis/PRB participation, screening uptake, and follow-up indicators.	Legal text alone cannot estimate utilization or budget impact.

Workstream	Owner	Platform	Funding route	M&E	Risk
Cancer-specific safeguards	Kemenkes cancer/clinical units + referral providers	FKTP/FKRTL/laborkinpus referral pathway	kinpus referral facility/local routes where applicable	Referral continuity, privacy safeguards, diagnostic eligibility, and medicine-restriction compliance.	Permenkes 3/2026 revocation exceptions need legal reading before retaining older cancer provisions.

## Equity Matrix

Group	PROGRESS-Plus	Known signal	Gap	Required check
Women and cancer screening populations	Gender, age, health status	Privacy/referral safeguards and cancer-specific screening provisions.	Rural/remote access, affordability, disability, and socioeconomic barriers are not consistently explicit.	Map entitlement, referral, privacy, and access mitigation in current rule and retained provisions.
JKN participants and chronic-disease patients	Socioeconomic status, health status, insurance/financial protection	BPJS screening, Prolanis, PRB, and information-system provisions.	Benefit access and follow-up burden are not the same as equitable uptake.	Add utilization/discontinuity data and provider incentive review.
Workers and workplace populations	Occupation, place, socioeconomic status	Government-private promotive/preventive cooperation.	Worker protections outside formal workplaces are unclear.	Check informal-sector reach and private-sector accountability.
General population and high-risk groups	Place, age, socioeconomic status, disability, social capital	Permenkes 3/2026 covers PTM prevention, participation, reporting, supervision, sanctions, and funding.	Legal text needs operational disaggregation and resource allocation rules.	Require PROGRESS-Plus table before any scale-up recommendation.

## Evidence Register

ID	Type	Framework	Citation	Finding	Counter/not-found status
E01	strategic_finding	P1/P7	bpk:172102 Pasal 4	National PTM stewardship defines UKM/UKP responsibility across government and society.	not_saturation_checked

ID	Type	Framework	Citation	Finding	Counter/not-found status
E02	strategic_finding	P1/P2	bpk:172102 Pasal 6	PTM prioritisation is anchored in mortality, disability, morbidity, cost burden, and modifiable risk factors.	not_saturation_checked
E03	strategic_finding	P13/P15	bpk:172102 Pasal 23	Surveillance and M&E are explicit in the national PTM rule, including prevention, control, and handling indicators.	not_saturation_checked
E04	strategic_finding	P14/P22	bpk:269103 Pasal 12	Resource responsibility is broad but often stated as a funding source rather than a costed implementation plan.	not_saturation_checked
E05	strategic_finding	P13/P16	bpk:116060 Pasal 11	Cancer policy contains privacy and referral safeguards for breast and cervical cancer services.	not_saturation_checked
E06	strategic_finding	P13/P21	bpk:269103 Pasal 9	Local POS-BINDU/CERDIK models translate PTM control into vil-lage/community implementation.	not_saturation_checked
E07	strategic_finding	P7/P15	bpk:262094 Pasal 15	Subnational action plans use multi-sector participation and routine reporting cycles.	not_saturation_checked
E08	strategic_finding	P22	bpk:311193 Pasal 25	BPJS regulation connects screening, Prolanis, PRB, financing of group activities, and information systems.	not_saturation_checked

ID	Type	Framework	Citation	Finding	Counter/not-found status
E09	strategic_finding	P5/P22	bpk:111925 Pasal 1	JKN medicine policy uses restrictions for trastuzumab to balance access, quality, and cost control.	not_saturation_checked
E10	strategic_finding	P7/P13	bpk:150192 Pasal 5	Private-sector collaboration appears in local PTM prevention but is framed mainly as promotive/preventive cooperation.	not_saturation_checked
E11	strategic_finding	P19/P21	bpk:255847 Pasal 64	Some local PTM rules include enforceable prohibitions and facility/worker licensing provisions.	not_saturation_checked
E12	strategic_finding	P13/P15/P22	bpk:194972 Pasal 17	Province-level PTM rules can specify detection settings, Posbindu roles, surveillance, annual reporting, and APBD funding.	not_saturation_checked
E13	strategic_finding	P1/P19	kemkes:7186 Pasal 3	Permenkes 3/2026 is the current integrated disease-control anchor and explicitly includes PTM scope.	not_saturation_checked
E14	strategic_finding	P19/P21	kemkes:7186 Konsiderans	Permenkes 3/2026 is anchored to UU 17/2023 and PP 28/2024 in its legal basis.	not_saturation_checked
E15	strategic_finding	P14/P22	kemkes:7186 Pasal 95	The current integrated disease-control rule keeps funding explicit through APBN, APBD, and other lawful sources.	not_saturation_checked

ID	Type	Framework	Citation	Finding	Counter/not-found status
E16	strategic_finding	P7/P13/P15	kemkes:7186 Pasal 85	The current integrated rule contains participation, recording/reporting, supervision, and sanctions hooks.	not_saturation_checked
D01	document_trace	P3/P19 corpus traceability	kemkes:7186 Konsiderans	Document-level trace for current_legal_anchor: primary function=governance_coordination; actor=central_government; instrument=legal_mandate.	basic_signals_present
D02	document_trace	P3/P19 corpus traceability	bpk:323024 Pasal 2	Document-level trace for facility_governance_adjacent: primary function=governance_coordination; actor=hospital_fkrtl; instrument=organization_establishment.	basic_signals_present
D03	document_trace	P3/P19 corpus traceability	bpk:312656 Pasal 1	Document-level trace for facility_governance_adjacent: primary function=partnership_private; actor=hospital_fkrtl; instrument=partnership_agreement.	basic_signals_present
D04	document_trace	P3/P19 corpus traceability	bpk:311193 Pasal 1	Document-level trace for service_jkn_financing_support: primary function=screening_early_detection; actor=puskesmas_fktp; instrument=service_package.	basic_signals_present
D05	document_trace	P3/P19 corpus traceability	bpk:303599 Pasal 2	Document-level trace for facility_governance_adjacent: primary function=governance_coordination; actor=hospital_fkrtl; instrument=legal_mandate.	basic_signals_present

ID	Type	Framework	Citation	Finding	Counter/not-found status
D06	document_trace	P3/P19 corpus traceability	bpk:303598 Pasal 1	Document-level trace for facility_governance_adjacent: primary function=governance_coordination; actor=hospital_fkrtl; instrument=service_package.	basic_signals_present
D07	document_trace	P3/P19 corpus traceability	bpk:269103 Pasal 2	Document-level trace for core_ptm_population_policy: primary function=community_engagement; actor=community_cadres; instrument=service_package.	basic_signals_present
D08	document_trace	P3/P19 corpus traceability	bpk:303597 Pasal 1	Document-level trace for facility_governance_adjacent: primary function=monitoring_evaluation; actor=hospital_fkrtl; instrument=strategic_plan.	no_explicit_equity_signal
D09	document_trace	P3/P19 corpus traceability	bpk:255847 Pasal 2	Document-level trace for core_ptm_population_policy: primary function=community_engagement; actor=community_cadres; instrument=legal_mandate.	basic_signals_present
D10	document_trace	P3/P19 corpus traceability	bpk:194972 Pasal 2	Document-level trace for core_ptm_population_policy: primary function=governance_coordination; actor=community_cadres; instrument=screening_protocol.	basic_signals_present
D11	document_trace	P3/P19 corpus traceability	bpk:278850 Pasal 1	Document-level trace for core_ptm_population_policy: primary function=governance_coordination; actor=health_office; instrument=service_package.	basic_signals_present

ID	Type	Framework	Citation	Finding	Counter/not-found status
D12	document_trace	P3/P19 corpus traceability	bpk:165166 Pasal 1	Document-level trace for core_ptm_population_policy: primary function=community_engagement; actor=community_cadres; instrument=service_package.	basic_signals_present
D13	document_trace	P3/P19 corpus traceability	bpk:146531 Pasal 1	Document-level trace for core_ptm_population_policy: primary function=prevention_promotion; actor=community_cadres; instrument=monitoring_evaluation.	basic_signals_present
D14	document_trace	P3/P19 corpus traceability	bpk:127745 Pasal 2	Document-level trace for core_ptm_population_policy: primary function=prevention_promotion; actor=community_cadres; instrument=service_package.	basic_signals_present
D15	document_trace	P3/P19 corpus traceability	bpk:262094 Pasal 1	Document-level trace for core_ptm_population_policy: primary function=prevention_promotion; actor=community_cadres; instrument=strategic_plan.	basic_signals_present
D16	document_trace	P3/P19 corpus traceability	bpk:150192 Pasal 1	Document-level trace for core_ptm_population_policy: primary function=governance_coordination; actor=local_government; instrument=partnership_agreement.	basic_signals_present
D17	document_trace	P3/P19 corpus traceability	bpk:127838 Pasal 5	Document-level trace for core_disease_specific_ptm: primary function=community_engagement; actor=community_cadres; instrument=legal_mandate.	basic_signals_present

ID	Type	Framework	Citation	Finding	Counter/not-found status
D18	document_trace	P3/P19 corpus traceability	bpk:164222 Pasal 4	Document-level trace for core_ptm_population_policy: primary function=governance_coordination; actor=community_cadres; instrument=monitoring_evaluation.	basic_signals_present
D19	document_trace	P3/P19 corpus traceability	bpk:164397 Pasal 1	Document-level trace for adjacent_chronic_support: primary function=service_delivery_referral; actor=local_government; instrument=legal_mandate.	no_explicit_me_signal
D20	document_trace	P3/P19 corpus traceability	bpk:111925 Pasal 1	Document-level trace for service_jkn_financing_support: primary function=financing_resourcing; actor=central_government; instrument=service_package.	basic_signals_present
D21	document_trace	P3/P19 corpus traceability	kemkes:500 Pasal 1	Document-level trace for health_system_context: primary function=medicines_technology; actor=central_government; instrument=legal_mandate.	no_explicit_me_signal
D22	document_trace	P3/P19 corpus traceability	bpk:111968 Pasal 1	Document-level trace for core_ptm_population_policy: primary function=community_engagement; actor=central_government; instrument=strategic_plan.	basic_signals_present
D23	document_trace	P3/P19 corpus traceability	bpk:112083 Pasal 5	Document-level trace for core_disease_specific_ptm: primary function=screening_early_detection; actor=central_government; instrument=legal_mandate.	basic_signals_present

ID	Type	Framework	Citation	Finding	Counter/not-found status
D24	document_trace	P3/P19 corpus traceability	kemkes:861 Pasal 1	Document-level trace for health_system_context: primary function=governance_coordination; actor=central_government; instrument=legal_mandate.	no_explicit_me_signal
D25	document_trace	P3/P19 corpus traceability	kemkes:1080 Pasal 5	Document-level trace for health_system_context: primary function=screening_early_detection; actor=central_government; instrument=legal_mandate.	no_explicit_financing_signal   <del>not</del> :explicit_me_signal
D26	document_trace	P3/P19 corpus traceability	bpk:201192 Pasal 1	Document-level trace for core_ptm_population_policy: primary function=problem_framing_evidence; actor=community_cadres; instrument=screening_protocol.	basic_signals_present
D27	document_trace	P3/P19 corpus traceability	bpk:172102 Pasal 1	Document-level trace for core_ptm_population_policy: primary function=community_engagement; actor=community_cadres; instrument=legal_mandate.	basic_signals_present
D28	document_trace	P3/P19 corpus traceability	bpk:116060 Pasal 1	Document-level trace for core_disease_specific_ptm: primary function=community_engagement; actor=community_cadres; instrument=legal_mandate.	basic_signals_present
D29	document_trace	P3/P19 corpus traceability	kemkes:3152 Pasal 1	Document-level trace for facility_governance_adjacent: primary function=community_engagement; actor=central_government; instrument=legal_mandate.	basic_signals_present

ID	Type	Framework	Citation	Finding	Counter/not-found status
D30	document_trace	P3/P19 corpus traceability	bpk:201416 Pasal 1	Document-level trace for facility_governance_adjacent: primary function=governance_coordination; actor=health_office; instrument=legal_mandate.	no_explicit_financing_signal
D31	document_trace	P3/P19 corpus traceability	bpk:299796 Pasal 1	Document-level trace for adjacent_chronic_support: primary function=financing_resourcing; actor=local_government; instrument=legal_mandate.	basic_signals_present
D32	document_trace	P3/P19 corpus traceability	bpk:53939 Pasal 1	Document-level trace for facility_governance_adjacent: primary function=governance_coordination; actor=hospital_fkrtl; instrument=legal_mandate.	basic_signals_present
D33	document_trace	P3/P19 corpus traceability	bpk:53932 Pasal 1	Document-level trace for facility_governance_adjacent: primary function=governance_coordination; actor=hospital_fkrtl; instrument=legal_mandate.	basic_signals_present
D34	document_trace	P3/P19 corpus traceability	bpk:78497	Document-level trace for facility_governance_adjacent: primary function=governance_coordination; actor=central_government; instrument=legal_mandate.	no_explicit_me_signal

## Register Dokumen Lengkap

Document	Year	Type	Tier	Status interpretation	Chunks	Primary function
kemkes:7186 - Peraturan Menteri Kesehatan Nomor 3 Tahun 2026	2026	Permenkes	current_legal_and	active_by_source	32metadata	governance_coordination
bpk:323024 - Pembentukan, Kedudukan, Susunan Organisasi, Tugas dan Fungsi serta Tata Kerja Rumah Sa	2025	Pergub	facility_governance	active_by_source	33metadata	governance_coordination
bpk:312656 - Tata Cara Kerja Sama dengan Pihak Lain pada Badan Layanan Umum Daerah Rumah Sakit Jant	2024	Pergub	facility_governance	active_by_source	22metadata	partnership_private
bpk:311193 - Pelayanan Skrining Riwayat Kesehatan, Pelayanan Penapisan atau Skrining Kesehatan Tert	2024	Peraturan BPJS Kesehatan	service_jkn_financial	active_by_source	41metadata	screening_early_detection
bpk:303599 - Pola Tata Kelola Badan Layanan Umum Daerah Rumah Sakit Jantung, Pembuluh Darah dan Ota	2023	Pergub	facility_governance	active_by_source	150metadata	governance_coordination
bpk:303598 - Standar Pelayanan Minimal Rumah Sakit Jantung Pembuluh Darah dan Otak Oputa Yi Koo Pro	2023	Pergub	facility_governance	active_by_source	23metadata	governance_coordination

Document	Year	Type	Tier	Status interpretation	Chunks	Primary function
bpk:269103 - Pengendalian Penyakit Tidak Menular Melalui Pos Pembinaan Terpadu (POSBINDU) Pekon Di	2023	Perbup	core_ptm_popul	active_policy	source4metadata	community_engagement
bpk:303597 - Rencana Strategis Rumah Sakit Jantung Pembuluh Darah dan Otak Oputa Yi Koo	2023	Pergub	facility_governan	active_policy	source7_metadata	monitoring_evaluation
bpk:255847 - Penanggulangan Penyakit Menular dan Penyakit Tidak Menular	2022	Perda	core_ptm_popul	active_policy	source25metadata	community_engagement
bpk:194972 - Penanggulangan Penyakit Tidak Menular	2021	Pergub	core_ptm_popul	active_policy	source21metadata	governance_coordination
bpk:278850 - Penyelenggaraan Sistem Pelayanan Terpadu Penyakit Tidak Menular (SIPANDUPE-TIR) Dinas K	2021	Perbup	core_ptm_popul	active_policy	source10metadata	governance_coordination
bpk:165166 - PEDOMAN PENANGGULANGAN PENYAKIT TIDAK MENULAR	2020	Perwali	core_ptm_popul	active_policy	source20metadata	community_engagement
bpk:146531 - Pengendalian Penyakit Tidak Menular melalui Kampung Cerdik	2020	Perbup	core_ptm_popul	active_policy	source19metadata	prevention_promotion

Document	Year	Type	Tier	Status interpretation	Chunks	Primary function
bpk:127745 - Pencegahan dan Pengendalian Penyakit Tidak Menular di Kabupaten Lima Puluh Kota	2019	Perbup	core_ptm_population	active_policy	source42metadata	prevention_promotion
bpk:262094 - Rencana Aksi Daerah Upaya Pencegahan dan Pengendalian Penyakit Tidak Menular Tahun 202	2019	Perwali	core_ptm_population	active_policy	source20metadata	prevention_promotion
bpk:150192 - PEDOMAN PENYELENGGARAAN KERJA SAMA PEMERINTAH KOTA BATU DENGAN SWASTA DALAM PENANGGULA	2019	Perwali	core_ptm_population	active_policy	source18metadata	governance_coordination
bpk:127838 - Penanggulangan Kanker Payudara dan Kanker Leher Rahim di Kabupaten Lima Puluh Kota	2019	Perbup	core_disease_specific	by_source	source12metadata	community_engagement
bpk:164222 - Pengendalian Penyakit Tidak Menular di Kabupaten Kepulauan Tanimbar.	2019	Perbup	core_ptm_population	active_policy	source10metadata	governance_coordination

Document	Year	Type	Tier	Status interpretation	Chunks	Primary function
bpk:164397 - Pedoman Teknis Penyelenggaraan Bantuan Pelayanan Kesehatan Rujukan Pasien, Biaya Penda	2019	Perbup	adjacent_chronic	active_by_source4	metadata	service_delivery_referral
bpk:111925 - Petunjuk Teknis Restriksi Penggunaan Obat Trastuzumab Untuk Kanker Payudara Metastasis	2018	Permenkes	service_jkn_financ	conciliation_required_later_kemkes	financ	financ
kemkes:500 - Peraturan Menteri Kesehatan Nomor 22 Tahun 2018	2018	Permenkes	health_system_context	conciliation_required_later_kemkes	medicines_tech	technology
bpk:111968 - Rencana Aksi Nasional Penanggulangan Penyakit Tidak Menular Tahun 2015-2019	2017	Permenkes	core_ptm_populat	active_by_source7	metadata	community_engagement
bpk:112083 - Perubahan Atas Peraturan Menteri Kesehatan Nomor 34 Tahun 2015 Tentang Penanggulan	2017	Permenkes	core_disease_spe	conciliation_required_later_kemkes	emerge	early_detection
kemkes:861 - Peraturan Menteri Kesehatan Nomor 5 Tahun 2017	2017	Permenkes	health_system_context	active_by_source5	metadata	governance_coordination

Document	Year	Type	Tier	Status interpretation	Chunks	Primary function	
kemkes:1080 - Peraturan Menteri Kesehatan Nomor 29 Tahun 2017	2017	Permenkes	health_system_coordination	conciliation_required_later_kemkes	1	early_detection	
bpk:201192 - Penyelenggaraan Sinergitas Penanganan Deteksi Dini Faktor Risiko Penyakit Tidak Menula	2016	Perbup	core_ptm_population	active_policy_source	3	metadata	problem_framing_evidence
bpk:172102 - Penanggulangan Penyakit Tidak Menular	2015	Permenkes	core_ptm_population	conciliation_required_later_kemkes	2	engagement	engagement
bpk:116060 - Penanggulangan Kanker Payudara Dan Kanker Leher Rahim	2015	Permenkes	core_disease_specific	conciliation_required_later_kemkes	5	engagement	engagement
kemkes:3152 - Peraturan Menteri Kesehatan Nomor 71 Tahun 2015	2015	Permenkes	facility_governance	conciliation_required_later_kemkes	2	engagement	engagement
bpk:201416 - Unit Pelaksana Teknis Laboratorium Kesehatan Dan Jantung Paru Pada Dinas Kesehatan Kot	2014	Perwali	facility_governance	active_policy_source	19	metadata	governance_coordination
bpk:299796 - Petunjuk Teknis Pemberian Bantuan Hibah Kepada Perorangan Untuk Bekas Penderita Penyakit	2011	Perbup	adjacent_chronic	active_policy_source	3	metadata	financing_resourcing

Document	Year	Type	Tier	Status interpretation	Chunks	Primary function
bpk:53939 - Pendirian Perusahaan Jawatan Rumah Sakit Kanker Dharmais Jakarta	2000	PP	facility_governance	active	source65metadata	governance_coordination
bpk:53932 - Pendirian Perusahaan Jawatan Rumah Sakit Jantung Dan Pembuluh Darah Harapan Kita Jakar	2000	PP	facility_governance	active	source64metadata	governance_coordination
bpk:78497 - Menteri Kesehatan Untuk Memegang Tanggung Jawab Pengurusan dan Meneruskan Penyelesaian	1975	Keppres	facility_governance	active	source1_metadata	governance_coordination

## Text Quality Dan OCR Gate

Document	Quality status	OCR review	Use rule
kemkes:7186 - Peraturan Menteri Kesehatan Nomor 3 Tahun 2026	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:323024 - Pembentukan, Kedudukan, Susunan Organisasi, Tugas dan Fungsi serta Tata	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:312656 - Tata Cara Kerja Sama dengan Pihak Lain pada Badan Layanan Umum Daerah Ru	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:311193 - Pelayanan Skrining Riwayat Kesehatan, Pelayanan Penapisan atau Skrining	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:303599 - Pola Tata Kelola Badan Layanan Umum Daerah Rumah Sakit Jantung, Pembuluh	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.

Document	Quality status	OCR review	Use rule
bpk:303598 - Standar Pelayanan Minimal Rumah Sakit Jantung Pembuluh Darah dan Otak Op	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:269103 - Pengendalian Penyakit Tidak Menular Melalui Pos Pembinaan Terpadu (POSBI	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:303597 - Rencana Strategis Rumah Sakit Jantung Pembuluh Darah dan Otak Oputa Yi K	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:255847 - Penanggulangan Penyakit Menular dan Penyakit Tidak Menular	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:194972 - Penanggulangan Penyakit Tidak Menular	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:278850 - Penyelenggaraan Sistem Pelayanan Terpadu Penyakit Tidak Menular (SIPANDU	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:165166 - PEDOMAN PENANGGULANGAN PENYAKIT TIDAK MENULAR	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:146531 - Pengendalian Penyakit Tidak Menular melalui Kampung Cerdik	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:127745 - Pencegahan dan Pengendalian Penyakit Tidak Menular di Kabupaten Lima Pul	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:262094 - Rencana Aksi Daerah Upaya Pencegahan dan Pengendalian Penyakit Tidak Men	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:150192 - PEDOMAN PENYELENGGARAAN KERJA SAMA PEMERINTAH KOTA BATU DENGAN SWASTA DA	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:127838 - Penanggulangan Kanker Payudara dan Kanker Leher Rahim di Kabupaten Lima	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:164222 - Pengendalian Penyakit Tidak Menular di Kabupaten Kepulauan Tanimbar.	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.

Document	Quality status	OCR review	Use rule
bpk:164397 - Pedoman Teknis Penyelenggaraan Bantuan Pelayanan Kesehatan Rujukan Pasien	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:111925 - Petunjuk Teknis Restriksi Penggunaan Obat Trastuzumab Untuk Kanker Payud	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
kemkes:500 - Peraturan Menteri Kesehatan Nomor 22 Tahun 2018	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:111968 - Rencana Aksi Nasional Penanggulangan Penyakit Tidak Menular Tahun 2015-2	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:112083 - Perubahan Atas Peraturan Menteri Kesehatan Nomor 34 Tahun 2015 Tentang P	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
kemkes:861 - Peraturan Menteri Kesehatan Nomor 5 Tahun 2017	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
kemkes:1080 - Peraturan Menteri Kesehatan Nomor 29 Tahun 2017	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:201192 - Penyelenggaraan Sinergitas Penanganan Deteksi Dini Faktor Risiko Penyakit	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:172102 - Penanggulangan Penyakit Tidak Menular	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:116060 - Penanggulangan Kanker Payudara Dan Kanker Leher Rahim	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
kemkes:3152 - Peraturan Menteri Kesehatan Nomor 71 Tahun 2015	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:201416 - Unit Pelaksana Teknis Laboratorium Kesehatan Dan Jantung Paru Pada Dinas	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:299796 - Petunjuk Teknis Pemberian Bantuan Hibah Kepada Perorangan Untuk Bekas Pe	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:53939 - Pendirian Perusahaan Jawatan Rumah Sakit Kanker Dharmais Jakarta	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.
bpk:53932 - Pendirian Perusahaan Jawatan Rumah Sakit Jantung Dan Pembuluh Darah Hara	ok_or_not_flagged	no	Native text appears usable or has no warning in the extraction register.

Document	Quality status	OCR review	Use rule
bpk:78497 - Menteri Kesehatan Untuk Memegang Tanggung Jawab Pengurusan dan Meneruska	low_text_yield	yes	Do not use for fine-grained Pasal claims without OCR/manual check.

## Analisis Lanjutan Yang Direkomendasikan

1. Validasi dengan Kemenkes Biro Hukum mengenai retained exceptions Permenkes 3/2026 untuk Permenkes 71/2015, 34/2015, dan 29/2017, serta relasi Permenkes 5/2026 untuk Permenkes 22/2018/trastuzumab.
2. Jalankan content SNA aktor-aksi-target untuk pasal prioritas: aktor, verba kewajiban/kewenangan, target populasi/layanan, instrumen, sumber pembiayaan, penerima laporan, dan sanksi.
3. Tambahkan lampiran burden, utilisasi, unit cost, tariff/benefit, dan fiscal space untuk opsi yang akan dinaikkan menjadi rekomendasi perubahan kebijakan.
4. Lakukan PROGRESS-Plus validation dengan data akses dan burden terdisagregasi.
5. Manual check/OCR dokumen yang ditandai quality warning sebelum dipakai untuk klaim legal granular.

## Caveat

- Ini siap dibaca sebagai draft technical policy review untuk validasi Kemenkes, bukan pendapat hukum final.
- Status hukum memakai metadata BPK/Kemkes dan relation scrape; konflik status ditandai sebagai reconciliation\_required, bukan dipaksa menjadi Berlaku/Tidak Berlaku.
- Beberapa dokumen tata kelola fasilitas ikut masuk sebagai konteks pendukung, bukan core PTM authority.
- Klaim equity dan budget impact dibatasi pada sinyal regulasi; angka biaya, volume, dan burden perlu data eksternal.