

PTM Thematic Analysis: Kemenkes Share-Readiness Audit

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Verdict

Ready as a Kemenkes-facing technical policy review draft; not a final legal opinion

Share status: Shareable as a validation-ready policy review package with caveats and annexes

Readiness score: 28/36 (77.8%).

Decision: Boleh dibagikan ke Kemenkes sebagai draft technical policy review untuk validasi, dengan label bahwa rekomendasi masih memerlukan legal sign-off, stakeholder validation, dan data biaya/burden sebelum menjadi posisi final.

Independent Auditor Consensus

Auditor	Verdict	Finding
Legal/regulatory	Acceptable with caveats	No severe blocker for sharing as a Kemenkes-facing technical policy review draft; retained exceptions and current-use status still need Biro Hukum validation.
Evidence/methods/readiness	Acceptable with caveats	Evidence package, PDF, CSV matrices, and readiness gates are sufficient for validation draft; saturation, budget impact, stakeholder validation, and OCR/manual checks remain upgrade requirements.
Actionability	Acceptable with caveats	Policy options, recommendation traceability, implementation/budget matrix, equity matrix, and next steps are usable as a technical validation package, not as final institutional recommendation.

Why This Is Not Yet A Formal Policy Recommendation

- Exact retained-exception clauses under Permenkes 3/2026 still need legal reading.
- Budget impact remains qualitative because volume, unit cost, and tariff data are not in the legal corpus.
- Stakeholder positions and feasibility have not been validated with Kemenkes/BPJS/daerah.
- Some OCR/text-quality flags require manual check before fine-grained legal claims.

What Can Be Shared Now

- Executive summary and cautious recommendation package.
- Full PTM corpus boundary with inclusion tiers and adjacent/context labels.
- Legal/status matrix anchored to Permenkes 3/2026, UU 17/2023, and PP 28/2024.
- Expanded evidence register with document-level traceability and caveats.
- Policy options, implementation/budget matrix, equity matrix, and text-quality matrix.

What Must Not Be Claimed

- Bahwa ARC sudah memberi legal opinion final tentang pencabutan/perubahan semua pasal.
- Bahwa rekomendasi sudah menjadi posisi institusional final tanpa validasi Kemenkes.
- Bahwa actor map saat ini sudah merupakan accountability network final.
- Bahwa budget impact atau cost-effectiveness sudah terhitung.

- Bahwa equity sudah selesai tanpa data disaggregated burden/access.

Evidence Context

The PTM pilot currently uses 34 documents, 1022 chunks, 50 cited evidence items, and 6 gap areas. This is enough for a methods pilot and agenda-setting discussion, but not enough for a recommendation to amend or replace a regulation.

Readiness Scorecard

Criterion	Framework	Status	Current basis	Gap	Required before recommendation
Problem framing and PTM burden	P1/P2	Amber (2/3)	Regulasi nasional memuat problem framing PTM, faktor risiko, UKM/UKP, dan beberapa kriteria prioritas.	Beban lokal, baseline layanan, mortalitas/morbiditas terdisagregasi, dan tren biaya belum diekstrak sistematis per dokumen.	Tambahkan evidence matrix per dokumen: beban penyakit, kelompok target, baseline layanan, dan bukti masalah yang eksplisit.
Corpus boundary and inclusion logic	P3/S2	Green (3/3)	Korpus PTM diberi inclusion tier dan core_weight, termasuk pemisahan current anchor, core PTM, service/JKN, facility governance, dan adjacent context.	Adjudication manusia tetap ideal untuk boundary borderline.	Gunakan tier sebagai basis core synthesis dan taruh adjacent-only sebagai lampiran/context.
Legal hierarchy and harmonisation	P19/P21	Amber (2/3)	Permenkes 3/2026, UU 17/2023, PP 28/2024, source status, dan relasi pencabutan Kemkes sudah masuk status matrix.	Exact retained exceptions and full decentralisation conflict test still need legal reading.	Validasi pasal pengecualian dan kewenangan pusat-daerah dengan Kemenkes Biro Hukum.
Evidence traceability and saturation	P2/P3	Amber (2/3)	Ada 50 evidence item tertelusur dengan citation ke dokumen/pasal.	Evidence register masih contoh strategis, bukan saturation pass atau counter-evidence pass.	Setiap klaim rekomendasi harus punya minimal satu bukti utama, satu cross-check dokumen lain, dan status not-found/counter-evidence.

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Tagging reliability	P3	Amber (2/3)	Audit dua worker tightened schema menunjukkan reliability cukup untuk pilot routing dan beberapa field utama.	Reliability tidak sama dengan correctness; belum ada gold-standard adjudication final.	Adjudicate 10-20 dokumen prioritas dengan rationale label final dan perbaiki schema dari error nyata.
Policy options and trade-offs	P4/P6	Green (3/3)	Policy options table now states options, benefits, trade-offs, owners, and readiness.	Kemenkes must choose/prioritize options after validation.	Use the options table as the meeting agenda for validation and prioritisation.
Budget impact and JKN/APBD fit	P5/P22	Amber (2/3)	Implementation/budget matrix now maps JKN, APBN/APBD, lawful sources, platform, owner, and M&E hooks.	Net unit cost, volume, fiscal-space, or 5-year budget impact yet.	Request volume/unit-cost/tariff data before quantitative BIA.
Implementation feasibility and M&E	P13/P15	Green (3/3)	Implementation matrix now links workstream, owner, platform, funding route, near-term action, M&E, and risk.	Capacity and data-flow feasibility require stakeholder validation.	Validate owner/platform assumptions with Kemenkes, BPJS, and selected daerah.
Equity and target population safeguards	P16/P17	Amber (2/3)	Equity matrix now maps groups to PROGRESS-Plus dimensions, known signals, gaps, and required checks.	Disaggregated burden/access data are not in legal text.	Attach data-based equity check before option prioritisation.
Stakeholder process and political feasibility	P7/P8/P9/P11	Amber (2/3)	Actor map and implementation owners are explicit; SNA method is defined as next validation product.	Coalition positions and stakeholder validation log are not yet filled.	Use Kemenkes validation meeting to fill power-position and feasibility fields.
Text extraction and OCR completeness	P3	Amber (2/3)	Quality matrix now carries OCR/text warnings into the report.	Flagged documents still need OCR/manual review before fine-grained Pasal claims.	Do not cite flagged documents for detailed legal claims until checked.

Criterion	Framework	Status	Current basis	Gap	Required before recommendation
Recommendation wording and claim discipline	S4	Green (3/3)	Recommendation-to-evidence traceability table now includes evidence IDs, status basis, counter-evidence checks, certainty, owner, and monitoring indicator.	Final wording still needs Kemenkes validation before it becomes institutional recommendation.	Keep all recommendations framed as validation-ready draft until signed off.

Candidate Recommendations And Upgrade Requirements

Candidate recommendation	Current strength	Current support	Needed to upgrade
Harmonisasi dasar hukum PTM pasca-UU 17/2023	Validation-ready draft recommendation	Permenkes 3/2026, UU 17/2023/PP 28/2024 basis, and Kemkes revocation relations are now explicit.	Legal sign-off on retained exceptions and exact amendment/revocation implications.
Penguatan M&E dan accountability PTM daerah	Draft implementation recommendation	Report now maps surveillance, reporting, supervision, sanctions, owners, platforms, and risks.	Stakeholder validation and actor-action-target SNA.
Budgetability check untuk mandat pencegahan dan skrining PTM	Qualitative recommendation ready	Payer/funding route matrix covers JKN, APBN/APBD, and other lawful sources.	Volume, unit-cost, fiscal-space, and 5-year BIA data.
Equity safeguards untuk skrining, chronic care, dan kanker	Review-gate recommendation ready	Equity matrix links groups, PROGRESS-Plus dimensions, gaps, and required checks.	Disaggregated burden/access and patient/community validation.

Minimum Evidence Package Before Sharing As Policy Recommendation

1. Kemenkes legal validation of retained exceptions and current-use status.
2. Stakeholder validation log: Kemenkes unit terkait, BPJS, daerah, provider, patient/community perspective.
3. Quantitative burden and budget appendix for selected recommendations.
4. Manual OCR/legal-text check for documents flagged in the quality matrix.
5. Content SNA actor-action-target extraction for accountability edges.

Recommended Framing For Kemenkes

Frame this as a **preliminary technical briefing**: “ARC has built a reproducible pipeline to map PTM-related health regulations, identify evidence gaps, and prepare a joint validation path toward policy recommendation.” Do not frame it as “ARC recommends changing regulation X” until the legal-basis matrix, adjudicated evidence register, policy option table, implementation package, equity pass, and budgetability assessment are complete.