

CHAPTER V

FINALE

A. Conclusion

Based on the results of the research and discussion, it can be concluded as follows:

1. The regulation of the legal responsibility of medical recorders for the security of medical record data in health services has shown that there is a degree of vertical and horizontal synchronization, which means that the lower degree of regulation is in accordance with the higher degree of regulation and the higher degree of regulation is the basis for the formation of lower regulations and these regulations do not contradict each other. This is evidenced by the Regulation of the Minister of Health of the Republic of Indonesia Number 24 of 2022 concerning Medical Records, the Regulation of the Minister of Health of the Republic of Indonesia Number 55 of 2013 concerning the Implementation of Medical Recorder Work, Government Regulation Number 28 of 2024 concerning the Implementation of Law Number 17 of 2023 concerning Health and Law Number 17 of 2023 have been vertically synchronized with the Constitution of the Republic of Indonesia in 1945. Horizontally, it means that the equivalents do not contradict each other and can complement each other. This is evidenced by the content of the Regulation of the Minister of Health of the Republic of Indonesia Number 24 of 2022 concerning Medical Records which is in line with the content of the Regulation of the Minister of Health of the Republic of Indonesia Number 55 of 2013 concerning the Implementation of Medical Recorder Work.

2. The form of legal responsibility of medical recorders for the security of medical record data in health services in the structure of laws and regulations in Indonesia include:
 - a. Criminal law liability, based on Article 308 paragraph (1) and Article 440 of Law Number 17 of 2023 concerning Health.
 - b. Civil law liability, based on Article 308 paragraph (1) of Law Number 17 of 2023 concerning Health.
 - c. Administrative legal liability, based on Article 283, Article 306 of Law Number 17 of 2023 concerning Health, Article 19, Article 736 of Government Regulation Number 28 of 2024 concerning Implementation Regulations of Law Number 17 of 2023 concerning Health, Article 19, Article 21 and Article 22 of the Regulation of the Minister of Health of the Republic of Indonesia Number 55 of 2013 concerning the Implementation of Medical Recorder Work, and Article 42, Article 43, and Article 44 of the Regulation of the Minister of Health of the Republic of Indonesia Number 24 of 2022 concerning Medical Records.

B. Suggestion

1. Law-making institutions are expected to revise Law Number 17 of 2023 concerning Health, namely by adding an explanation of the forms of civil sanctions for medical personnel and health workers who violate these rules, so as to create legal certainty.
2. The Ministry of Health is expected to revise the new Regulation of the Minister of Health Number 24 of 2022 concerning Medical Records, namely by adding

articles regarding the authority, responsibilities, and obligations of medical recorders in health services. This can be done with the aim of ensuring compliance with professional standards, patient safety, quality of service, legal responsibility, and regulation as well as supervision of medical recorders in carrying out their practice.

