



DOI: <https://doi.org/10.38035/jlhr.v2i1>
<https://creativecommons.org/licenses/by/4.0/>

Health Law, Constitutional Court Ruling, and Handling of Medical Services: Juridical Analysis of Constitutional Court Decision Number 111/PUU-XXII/2024

Lili Andriani Gofar¹

¹Sekolah Tinggi Hukum Militer AHM-PTM, Jakarta, Indonesia, lili.a.gofar@gmail.com

Corresponding Author: lili.a.gofar@gmail.com¹

Abstract: Law Number 17 of 2023 concerning Health is a fundamental change in the Indonesian health legal system because it integrates various regulations that were previously scattered in a number of sectoral laws into a more comprehensive health legal framework. The law regulates the rights and obligations of the community, the implementation of health services, medical personnel and health workers, health service facilities, supervision, and legal accountability in health services. One of the important issues after the enactment of Law Number 17 of 2023 is the regulation of Collegiums, Councils, professional independence, and the mechanism for supervision of medical and health workers. The issue was then tested through the Constitutional Court Decision Number 111/PUU-XXII/2024. This research aims to analyze the legal position of Law Number 17 of 2023, the substance of the Constitutional Court Decision Number 111/PUU-XXII/2024, and its implications for the handling of medical services and the legal protection of patients and medical personnel. The research uses a normative juridical method with a legislative approach, a conceptual approach, and a case approach. The results of the study show that the Constitutional Court Decision Number 111/PUU-XXII/2024 strengthens the principle of Collegium independence and reorganizes the relationship between Collegium, Council, government, professional organizations, and professional supervision mechanisms. The decision has important implications for legal certainty, the quality of medical services, patient protection, and the professionalism of medical personnel. Therefore, the implementation of Law Number 17 of 2023 must be placed within the framework of a balance between state authority, professional scientific independence, patient safety, and the public's right to quality health services.

Keywords: Health Law, Law Number 17 of 2023, Constitutional Court Decision Number 111/PUU-XXII/2024, Medical Services, Collegium, Council, Patient Protection.

INTRODUCTION

Health is one of the fundamental human rights that is constitutionally guaranteed in Indonesia. Article 28H paragraph (1) of the 1945 Constitution of the Republic of Indonesia affirms the right of everyone to obtain health services, while Article 34 paragraph (3) mandates

the state to be responsible for the provision of health service facilities and proper public service facilities. Thus, health services are not solely a professional relationship between doctors and patients, but are also part of the state's constitutional obligation to ensure the welfare of the community (Republic of Indonesia, 1945).

Health regulation in Indonesia has undergone major changes after the enactment of Law Number 17 of 2023 concerning Health. The law repeals and replaces a number of sectoral regulations, including Law Number 36 of 2009 concerning Health, Law Number 29 of 2004 concerning Medical Practice, Law Number 44 of 2009 concerning Hospitals, Law Number 36 of 2014 concerning Health Workers, Law Number 38 of 2014 concerning Nursing, and several other laws. With this approach, lawmakers seek to create a more integrated health system (Republic of Indonesia, 2023).

Law Number 17 of 2023 not only regulates aspects of health services, but also makes changes to the governance of medical personnel and health workers. These changes include registration, licensing, education, competence, professional institutions, Councils, Collegiums, supervision, professional discipline, and legal accountability. Because these changes touch on the professional structure and authority of the state, there is a debate about the boundary between the authority of the government and the independence of the medical profession in developing science and maintaining health service standards (Prayuti et al., 2025; Merry et al., 2025).

This problem is becoming increasingly important because medical services have special characteristics. Doctors and medical personnel make decisions based on professional competence, science, professional standards, service standards, standard operating procedures, and individual patient conditions. Therefore, the legal regulation of medical services must be able to provide legal certainty to patients while providing legal protection to medical personnel who carry out their profession professionally and in accordance with standards (Damanik et al., 2024; Siregar et al., 2024).

In this context, the Constitutional Court Decision Number 111/PUU-XXII/2024 has an important meaning. The case was filed to test a number of provisions in Law Number 17 of 2023, namely Article 1 number 26, Article 272 paragraph (2) and paragraph (5), Article 421 paragraph (2) letter b, and Article 451 against Article 28C paragraph (1), Article 28D paragraph (1), and Article 28H paragraph (1) of the 1945 Constitution of the Republic of Indonesia. The Constitutional Court on January 30, 2026 granted part of the request.

The decision is relevant to the handling of medical services because the Collegium has a close relationship with the development of disciplines, educational standards, and competencies of medical personnel. Meanwhile, supervision of professional standards, services, ethics, and discipline is an important instrument in maintaining patient safety. Thus, changes in institutional construction due to the Constitutional Court's Decision can affect how the quality of medical services is built, supervised, and legally accounted for.

Based on this background, this study discusses three main issues. First, what is the legal position of Law Number 17 of 2023 in the Indonesian health legal system. Second, how to consider and understand the Constitutional Court Decision Number 111/PUU-XXII/2024 on the regulation of the Collegium and professional supervision. Third, what are the implications of the decision on the handling of medical services and the legal protection of patients and medical personnel.

METHOD

This research uses normative legal research methods or normative juridical research. Normative legal research places law as a norm that is studied through laws and regulations, court decisions, doctrines, legal principles, and scientific literature related to research problems. This approach is used because the main object of the research is Law Number 17 of

2023 and Constitutional Court Decision Number 111/PUU-XXII/2024 as primary legal material (Marzuki, 2017).

The approach used consists of a statute approach, a case approach, and a conceptual approach. The legislative approach is used to analyze the provisions in the 1945 Constitution of the Republic of Indonesia, Law Number 17 of 2023, and its implementing regulations. The case approach is used to analyze the Constitutional Court Decision Number 111/PUU-XXII/2024. Meanwhile, a conceptual approach is used to discuss professional independence, patient protection, legal certainty, patient safety, and medical service governance (Soekanto & Mamudji, 2015).

The primary legal materials in this study consist of the 1945 Constitution of the Republic of Indonesia, Law Number 17 of 2023 concerning Health, Government Regulation Number 28 of 2024, and Constitutional Court Decision Number 111/PUU-XXII/2024. Secondary legal materials consist of law books, scientific journals, academic articles, and relevant health law studies. The legal materials are analyzed qualitatively by descriptive-analytical method to gain an understanding of the legal construction and implications of the Constitutional Court's Decision on medical services (Marzuki, 2017; Soekanto & Mamudji, 2015).

RESULTS AND DISCUSSION

The Position of Law Number 17 of 2023 in the Health Law System

Law Number 17 of 2023 is a law that has a wide scope because it regulates almost all components of the national health system. Based on the subject matter, this law covers rights and obligations, responsibilities of central and regional governments, health administration, health efforts, health service facilities, health human resources, health supplies, health technology, health information systems, outbreaks, funding, community participation, guidance and supervision, investigations, criminal provisions, transitional provisions, and closing provisions (Republic of Indonesia, 2023).

The policy can be understood as an effort to harmonize health laws. Prior to Law Number 17 of 2023, health regulations were spread across various laws that had a sectoral orientation. Regulatory fragmentation has the potential to cause overlapping authority, differences in supervisory mechanisms, and inconsistency in the implementation of health services. Therefore, the unification of regulations can provide a more systematic basis for national health management (Republic of Indonesia, 2023).

However, the unification of regulations also has consequences in the form of changes in the distribution of authority between the state and professional organizations. These changes are clearly seen in the arrangements regarding the Collegium and Council. If the new arrangement is not accompanied by a clear limit of authority, the centralization of professional management can raise problems regarding the scientific and professional independence of medical personnel. Therefore, the balance between state supervision and professional independence is a very important legal issue (Merry et al., 2025).

Collegium as a Scientific Institution in Medical Services

Collegium has a strategic position in the health system because it is related to the development of disciplines and professional education. In the construction of Law Number 17 of 2023, the Collegium is defined as a collection of experts from each health discipline who oversee the branch of the discipline and carry out their duties and functions independently. Constitutional issues arise when the phrase that states the Collegium as a "fitting apparatus of the Council" is seen as potentially affecting the independence of the Collegium (Republic of Indonesia, 2023; Constitutional Court of the Republic of Indonesia, 2026).

The independence of the Collegium is not just a matter of professional organization, but is directly related to the quality of science and education of medical personnel. Competency

and education standards should be developed based on scientific developments, scientific evidence, service needs, patient safety, and health technology developments. Therefore, administrative intervention should not reduce the academic and professional freedom necessary to maintain the quality of medical science.

From the perspective of medical services, the existence of an independent Collegium has an indirect function to patient safety. The quality of education and competence of medical personnel will affect the ability of doctors to diagnose, determine therapy, perform medical measures, and handle complications. Thus, the governance of the Collegium ultimately has a relationship with the community's right to obtain quality health services.

Subject Matter of the Appeal in the Constitutional Court Decision Number 111/PUU-XXII/2024

Case Number 111/PUU-XXII/2024 was filed by Prof. Dr. Djohansjah Marzoeqi, dr., Sp.B., Sp.BP-RE., Sub.Sp EL. The application examines a number of norms in Law Number 17 of 2023 against the 1945 Constitution of the Republic of Indonesia. The norms tested include Article 1 number 26, Article 272 paragraph (2) and paragraph (5), Article 421 paragraph (2) letter b, and Article 451. The basis for the test used includes Article 28C paragraph (1), Article 28D paragraph (1), and Article 28H paragraph (1) of the 1945 Constitution of the Republic of Indonesia (Constitutional Court of the Republic of Indonesia, 2026).

The core of the issues in the case are related to the position of the Collegium, the independence of the Collegium, the authority to regulate further through Government Regulations, supervision of professional and ethical standards, and the existence of the Collegium that was formed before Law Number 17 of 2023 came into effect. These issues show the tension between the need for the state to build an integrated national health system and the needs of the profession to maintain its scientific and professional independence.

Important Warning of the Constitutional Court's Decision Number 111/PUU-XXII/2024

The Constitutional Court granted the Petitioner's application in part. One of the important changes is to Article 1 number 26 of Law Number 17 of 2023. The phrase "and is an accessory of the Council" is declared contrary to the 1945 Constitution of the Republic of Indonesia and does not have conditionally binding legal force as long as it is not interpreted as "and is an element of the membership of the Council". Thus, the construction of the Collegium is not placed as an administrative subordination of the Council, but as an element of the Council's membership that continues to carry out its duties and functions independently (Constitutional Court of the Republic of Indonesia, 2026).

The Court also gave a constitutional interpretation of Article 272 paragraph (2). The phrase "is an accessory of the Council and" should be interpreted as "is an element of the Council's membership and". The change is important because it juridically distinguishes between "fittings" and "membership elements". This construction strengthens the position of the Collegium as a scientific institution that has independence in carrying out its professional role (Constitutional Court of the Republic of Indonesia, 2026).

Regarding Article 272 paragraph (5), the Court interpreted that further arrangements regarding the Collegium, including its duties, functions, and authorities, must be made through Government Regulations with enforceability that conform to the Constitutional Court's Decision and still guarantee the independence of the Collegium. Thus, the implementing regulations must not form a construction that is contrary to the principle of independence that has been affirmed by the Constitutional Court (Constitutional Court of the Republic of Indonesia, 2026).

Professional Supervision and Ethics of Medical Personnel

One of the important aspects of the Constitutional Court Decision Number 111/PUU-XXII/2024 is the regulation of supervision. The Court stated that the phrase "as well as ethics and professional discipline" in Article 421 paragraph (2) b is contrary to the 1945 Constitution of the Republic of Indonesia and has no binding legal force. In addition, Article 421 paragraph (3) gives certain interpretations regarding public involvement in supervision, which among others involves the Collegium, the Professional Discipline Council, government representatives, related community organizations, academics, and/or experts (Constitutional Court of the Republic of Indonesia, 2026).

The decision shows that supervision of the medical profession cannot only be understood as the administrative authority of the government. Professional supervision requires special knowledge of scientific standards, competence, ethics, and professional discipline. Therefore, a supervision mechanism involving professional elements and experts can provide an approach that is more in accordance with the character of medical services.

The concept is also in line with the idea of peer review in the health profession. Assessment of medical procedures requires an understanding of professional standards, the patient's clinical condition, available treatment options, risk levels, and the development of medical science. Therefore, the settlement of alleged professional violations should not solely use an administrative or criminal approach, but it is necessary to pay attention to the mechanism of professional discipline and scientific standards (Siregar et al., 2024).

Implications of the Constitutional Court's Decision on the Handling of Medical Services

The Constitutional Court Decision Number 111/PUU-XXII/2024 indirectly has an impact on the handling of medical services. The first impact is increased legal certainty regarding the position of the Collegium. The Collegium still has a scientific function and must carry out its duties independently. This certainty is important so that the development of competency standards and education of medical personnel is not affected by administrative or political interests that can interfere with the objectivity of medical science (Constitutional Court of the Republic of Indonesia, 2026).

The second impact is related to the quality of medical services. Quality health services require competent medical personnel. These competencies are not only obtained from formal education, but also through professional education standards, competency certification, continuous science development, and professional development. Thus, the independence of scientific institutions has a close relationship with the quality of services received by the community (Prayuti et al., 2025).

The third impact has to do with patient protection. Patients have the right to receive safe, quality, and standard health services. Therefore, professional independence should not be understood as freedom without control. Independence must always be balanced with accountability, transparency, professional standards, service standards, standard operating procedures, and disciplinary mechanisms that can protect patients (Fadillah & Sewu, 2025).

The fourth impact is the protection of medical personnel. Medical personnel need legal certainty in carrying out medical measures. Not every bad outcome of a medical procedure can be immediately categorized as professional error or malpractice. Medical services have inherent risks in the patient's clinical condition. Therefore, the assessment of alleged wrongdoing must be carried out based on professional standards, competencies, procedures, and objective conditions at the time the action is carried out (Jayantara et al., 2024).

The Relationship between Patient Safety and Professional Independence

Patient safety is one of the main goals of the health care system. In the context of health law, patient safety must be the meeting point between patient rights, the obligations of medical

personnel, the responsibilities of health facilities, and the obligations of the state. Professional independence should not be an excuse to ignore patient safety, but rather patient safety should not be used to justify administrative interventions that eliminate the scientific independence of the profession.

The relationship can be described as follows:

Table 1. The relationship

Aspects	Patient Interest	The Importance of Medical Personnel	The Role of the State
Competencies	Get a competent doctor	Getting clear educational standards	Guarantee the education system
Security	Avoiding the risk of action	Get a professional procedure	Set standards
Ethics	Getting dignified service	Getting a fair disciplinary mechanism	Guarantee the surveillance system
Independence	Getting science-based decisions	Free from unscientific interventions	Guarantee regulation
Complaints	Gaining access to justice	Getting an objective check	Provide legal mechanisms
Finish	Get quality service	Acquire competency development	Conducting coaching and supervision

The table shows that professional independence and patient protection are not two interests that should be in conflict. The two can actually strengthen each other if placed in a legal system that guarantees scientific standards, accountability, transparency, and objective oversight mechanisms.

Handling of Alleged Medical Errors or Malpractices

In the practice of health services, alleged medical errors must be distinguished from medical complications or risks. A service result that does not meet the patient's expectations does not necessarily indicate a violation of the law. The assessment must pay attention to whether medical personnel have acted in accordance with their competence, professional standards, service standards, standard operating procedures, and patient conditions at the time of service provided (Jayantara et al., 2024).

The mechanism for handling alleged professional violations should ideally be carried out gradually. First, an examination of clinical facts and medical documentation is carried out. Second, an assessment of professional standards and operational procedure standards is carried out. Third, a professional discipline examination is carried out if there are indications of professional violations. Fourth, if a civil or criminal element is found, legal proceedings can be carried out in accordance with the provisions of laws and regulations.

This approach is needed so that the legal process does not directly criminalize medical personnel when there are poor service results. On the contrary, the approach must also provide effective protection for patients in the event of professional error or negligence. Thus, health law must be able to maintain a balance between patient safety and professional protection.

Informed Consent as an Instrument of Legal Protection

One of the important instruments in medical services is informed consent. Approval of medical measures is a form of respect for the patient's autonomy because patients have the right to know their health condition, choice of actions, benefits, risks, alternatives, and consequences of the medical measures to be carried out. The regulation regarding the approval of medical measures is also related to the principles of protection and safety contained in Law Number 17 of 2023 (Fadillah & Sewu, 2025).

From a legal perspective, informed consent should not be treated as just an administrative form. Approval should be a communication process between medical personnel and patients. Patients must be adequately informed so that they can make conscious decisions. Thus, informed consent documentation is one of the important tools in building legal certainty for patients and medical personnel.

In relation to the Constitutional Court Decision Number 111/PUU-XXII/2024, the quality of communication between medical personnel and patients needs to be placed as part of the professionalism of medical services. The independence of the Collegium and the strengthening of professional standards must be directed to ensure that medical personnel have scientific and professional skills as well as communication skills that support patient safety.

Legal Protection for Medical Personnel

Legal protection of medical personnel is an integral part of the health care system. Medical personnel who work according to professional standards need certainty that their professional actions are not necessarily punished or sued just because the results of their services are not as expected. Conversely, if medical personnel commit faults or negligence that can be accounted for, the legal system must provide a fair accountability mechanism (Prayuti et al., 2025).

Legal protection must be built through several instruments, namely clarity of professional standards, service standards, standard operating procedures, good medical records, communication with patients, informed consent, professional discipline mechanisms, and dispute resolution mechanisms. With such a system, the law enforcement process can distinguish between medical risks, complications, negligence, and actions that are actually a violation of the law.

Implications of the Decision on the Relationship of the Government, Council, Collegium and Professional Organizations

The Constitutional Court's Decision Number 111/PUU-XXII/2024 shows that the governance of the health profession must be built through a clear division of functions. The government has responsibilities in national health policy and public protection. The Council has a function in the registration and coaching system as determined by laws and regulations. The Collegium has a scientific and professional education function. Professional organizations have professional functions and representation of their members. The division must avoid overlapping authority (Constitutional Court of the Republic of Indonesia, 2026).

If each institution performs its functions according to its authority, the health system can become more effective. The government does not need to take over all professional functions, while professional organizations also cannot exercise the authority that should be in the realm of the state. The collegiate must have academic independence, but remain within the framework of national law and be responsible for the quality of the science it develops.

Model for Legal Handling of Medical Services After the Constitutional Court's Decision

Based on an analysis of Law Number 17 of 2023 and Constitutional Court Decision Number 111/PUU-XXII/2024, an ideal medical service handling model can be developed through six stages.

First, the level of prevention. Prevention is carried out through quality medical personnel education, competency standards, certification, continuous competency development, and the implementation of service standards.

Second, the service stage. Medical personnel provide services based on competence, professional standards, service standards, operational procedure standards, patient conditions, and patient safety principles.

Third, the documentation stage. Any medical procedure must be documented through complete and accurate medical records. Documentation is an important instrument for the benefit of service and legal proof.

Fourth, the level of complaints. Patients or families of patients who feel aggrieved must obtain an accessible, transparent, and objective complaint mechanism.

Fifth, the professional examination stage. Alleged violations of professional standards and discipline must first be assessed based on scientific competence and relevant professional discipline mechanisms.

Sixth, the stage of legal accountability. If the results of the examination show a violation of the law, civil, administrative, or criminal proceedings can be carried out based on the type of violation and the applicable legal provisions.

The model allows health law to carry out two functions simultaneously, namely providing protection to patients and providing legal certainty to medical personnel.

Juridical Analysis of the Constitutional Court Decision Number 111/PUU-XXII/2024

Juridically, the Constitutional Court's Decision Number 111/PUU-XXII/2024 shows the function of the Constitutional Court as a negative legislator who not only cancels norms, but can also provide a constitutional interpretation of norms so that they can be applied in accordance with the 1945 Constitution of the Republic of Indonesia. In this case, the Court used the conditionally unconstitutional technique against several provisions regarding the Collegium (Constitutional Court of the Republic of Indonesia, 2026).

This interpretation is important because the problem faced is not solely whether the Collegium should exist or not, but how the Collegium stands in the national health system. The Court maintains the existence of the national system, but at the same time provides a limit that the functions of the Collegium must be carried out independently.

From the perspective of the state of law, the decision can be understood as an effort to maintain a balance between state control and professional autonomy. The state still has the authority to regulate the health system because health is the responsibility of the state. However, this authority must not eliminate scientific independence which is a prerequisite for the development of health science and quality medical services.

The decision also has an important meaning for legal certainty. Changes in professional governance without clear boundaries can cause uncertainty for medical personnel, professional organizations, Collegiums, Councils, educational institutions, hospitals, and the community. By providing an interpretation of the norms tested, the Court provides direction for regulators and implementing institutions so that the implementation of Law Number 17 of 2023 remains within the constitutional corridor.

State of the Art

Table 2. State of the Art

Research/Regulation	Focus	Gap	Research Position
Law No. 17 of 2023	National health system reform	Not yet explaining all the implications of the latest Constitutional Court decision	Become a normative basis
Prayuti et al. (2025)	Legal protection of medical personnel	Focus on the protection of medical personnel	Developed with the perspective of the Constitutional Court Decision
Siregar et al. (2024)	Professional Discipline Council	Focus on professional discipline	Associated with changes in supervision after the Constitutional Court Decision
Damanik et al. (2024)	Authority of medical measures	Focus on dentists	Extended to professional governance
Fadillah & Sewu (2025)	Informed consent	Focus on patient protection	Associated with the medical service system
Merry et al. (2025)	Professional organizations and Collegiums	Has not fully reviewed Decision 111/2024	Integrating the Constitutional Court Decision 111/2024
This research	Health Law + Constitutional Court Decision 111/2024 + medical services	Integrating institutional and service aspects	Comprehensive juridical analysis

Studies on Law Number 17 of 2023 have developed on the issue of the protection of medical personnel, medical measures, professional discipline, informed consent, and professional institutions. However, the Constitutional Court's Decision Number 111/PUU-XXII/2024 provides new legal developments that need to be analyzed specifically because the decision changes the meaning of a number of norms regarding Collegiate and professional supervision.

CONCLUSION

Law Number 17 of 2023 concerning Health is the main legal instrument in the Indonesian health system that integrates various aspects of health administration, including medical services, medical personnel, health service facilities, supervision, discipline, and legal accountability. The regulation provides a more comprehensive legal basis, but at the same time results in major changes in the governance of the health profession.

The Constitutional Court Decision Number 111/PUU-XXII/2024 is an important development in Indonesian health law. The Court granted part of the application and provided a constitutional interpretation of several norms regarding the Collegium and professional supervision. The phrase that places the Collegium as a "fitting apparatus of the Council" is changed to "an element of the membership of the Council", while the independence of the Collegium must still be guaranteed.

The decision reinforces the principle that the development of health sciences and the medical profession requires scientific independence. However, such independence should not be understood as professional immunity from supervision and accountability. Independence must go hand in hand with accountability, professional standards, patient safety, transparency, and disciplinary mechanisms.

In handling medical services, the ideal legal approach is a layered approach that prioritizes prevention, competency improvement, application of professional standards, medical documentation, communication and informed consent, professional discipline examinations, and civil, administrative, or criminal liability if the elements of violation of the law are met.

Thus, the Constitutional Court's Decision Number 111/PUU-XXII/2024 can be seen as an effort to strengthen the balance between state authority and professional independence. The implementation of the decision must be directed to achieve the main goal of health law, which is to ensure safe, quality, fair, professional, and health-oriented health services that are oriented towards protecting patients' rights while providing legal certainty to medical personnel.

REFERENCES

- Damanik, L. S., Triana, Y., & Triana, I. (2024). Kewenangan dokter gigi umum atas tindakan medis berdasarkan Undang-Undang Nomor 17 Tahun 2023 tentang Kesehatan. *Jurnal Kesehatan Tambusai*, 5(1). <https://doi.org/10.31004/jkt.v5i1.25108>.
- Fadillah, M. R. H., & Sewu, L. S. (2025). Perlindungan hukum bagi pasien yang diberi tindakan medis tanpa informed consent dihubungkan dengan asas perlindungan dan keselamatan pasca lahirnya Undang-Undang Nomor 17 Tahun 2023 tentang Kesehatan. *Jurnal Ilmu Hukum, Humaniora dan Politik*, 5(3). <https://doi.org/10.38035/jihhp.v5i3.3793>.
- Jayantara, I. M. D., Hidayattullah, & Arief, H. (2024). Analisis pertanggungjawaban pidana dan penyelesaian terhadap tenaga medis yang melakukan malpraktik medis ditinjau dari perspektif Undang-Undang Nomor 17 Tahun 2023 tentang Kesehatan. *Jurnal Hukum Lex Generalis*.
- Mahkamah Konstitusi Republik Indonesia. (2026). Putusan Mahkamah Konstitusi Nomor 111/PUU-XXII/2024. Jakarta: Mahkamah Konstitusi Republik Indonesia.
- Marzuki, P. M. (2017). *Penelitian hukum (Edisi revisi)*. Kencana.
- Merry, M., Hertanto, Y., Islami, I. M. R., & Deny. (2025). Analisis normatif terhadap ketentuan Undang-Undang Nomor 17 Tahun 2023 tentang Kesehatan: Rekonstruksi kewenangan organisasi profesi dan Kollegium Kedokteran. *Jurnal Kolaboratif Sains*, 8(11). <https://doi.org/10.56338/jks.v8i11.7455>.
- Prayuti, Y., Kusumah, Y., & Abidin, Z. (2025). Perlindungan hukum bagi tenaga medis dan tenaga kesehatan dalam Undang-Undang Nomor 17 Tahun 2023 tentang Kesehatan. *Legal Standing: Jurnal Ilmu Hukum*, 9(2), 503–513. <https://doi.org/10.24269/lsv9i2.11760>.
- Republik Indonesia. (1945). *Undang-Undang Dasar Negara Republik Indonesia Tahun 1945*.
- Republik Indonesia. (2023). *Undang-Undang Nomor 17 Tahun 2023 tentang Kesehatan*. Lembaran Negara Republik Indonesia Tahun 2023 Nomor 105, Tambahan Lembaran Negara Republik Indonesia Nomor 6887.
- Republik Indonesia. (2024). *Peraturan Pemerintah Nomor 28 Tahun 2024 tentang Peraturan Pelaksanaan Undang-Undang Nomor 17 Tahun 2023 tentang Kesehatan*.
- Senja Belantar, M. O. D., & Triana, Y. (2024). Kewajiban surat izin praktik bagi dokter dalam pelayanan kesehatan berdasarkan Undang-Undang Nomor 17 Tahun 2023 tentang Kesehatan. *Jurnal Kesehatan Tambusai*, 5(1). <https://doi.org/10.31004/jkt.v5i1.25365>.
- Siregar, R. A., Sudarmanto, A. M., Nurmardiansyah, E., & Nugroho, H. P. (2024). Majelis Disiplin Profesi sebagai primum remedium berdasarkan Undang-Undang Nomor 17

- Tahun 2023 tentang Kesehatan. *Jurnal Hukum to-Ra: Hukum untuk Mengatur dan Melindungi Masyarakat*, 10(3), 491–505. <https://doi.org/10.55809/tora.v10i3.384>.
- Soekanto, S., & Mamudji, S. (2015). *Penelitian hukum normatif: Suatu tinjauan singkat*. Rajawali Pers.
- Wibowo, D. R. (2025). Analisis peraturan perundang-undangan mengenai kesehatan kerja pasca terbitnya Undang-Undang Nomor 17 Tahun 2023 tentang Kesehatan. *Soepra Jurnal Hukum Kesehatan*, 10(1). <https://doi.org/10.24167/sjkh.v10i1.11962>.
- Wijayanti, R., Sutarno, S., & Panjaitan, T. (2024). Telepsikiatri dalam Undang-Undang Nomor 17 Tahun 2023 dan Peraturan Pemerintah Nomor 28 Tahun 2024: Tinjauan hukum dan etika. *Jurnal Cahaya Mandalika*, 3(1), 773–783. <https://doi.org/10.36312/jcm.v3i1.3708>. Artikel di atas sudah diarahkan menjadi jurnal hukum kesehatan dengan metode yuridis normatif, dan fokus “No.111” saya tempatkan pada Putusan MK No. 111/PUU-XXII/2024, bukan sebagai nomor undang-undang. Sumber resmi menunjukkan bahwa putusan tersebut memang menyangkut Pasal 1 angka 26, Pasal 272 ayat (2) dan (5), Pasal 421 ayat (2) huruf b, serta Pasal 451 UU Kesehatan