

Understanding the Implementation of the Health Personnel Professional Competency Test; A Juridical Review

Gunawan Widjaja

Prodi Kajian Administrasi Rumah Sakit, Fakultas Kesehatan Masyarakat, Universitas Indonesia

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ABSTRACT

This study intends to conduct a juridical investigation of the regulation of the Professional Competency Test for health workers as regulated in various kinds of legislation today. As a normative study, this research uses a normative juridical method. The data used as a study is secondary data, focusing on various provisions governing Competency Tests, in general, and explicitly regulating the Competency Tests of health workers' professions. Data analysis was carried out qualitatively to assess the meaning of the existing legal rules. This descriptive-analytical research aims to provide an overview of the overall setting of the Competency Test. Furthermore, this study analyzed the purpose of implementing the Competency Test for health professionals. The application of general legal principles is also carried out in order to obtain optimum results. The study results indicate the need for a redefinition of the purpose of the National Competency Test, which can be applied to all health workers.

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Corresponding Author:

Gunawan Widjaja

Prodi Kajian Administrasi Rumah Sakit,

Universitas Indonesia,

Jl. Margonda Raya, Pondok Cina, Kec. Beji, Kota Depok, Jawa Barat

Email: widjaja_gunawan@yahoo.com

INTRODUCTION

Health is one of the basic human needs recognized by the world through the World Health Organization (WHO). The importance of health for its citizens is also regulated in the constitution, including the 1945 Constitution (UUD 1945). In the provisions of Article 28H of the 1945 Constitution, which consists of three articles, it is clearly stated: Article 28 H. Everyone has the right to live in physical and spiritual prosperity, a place to live, a good and healthy living environment, and the right to obtain health services. Everyone is entitled to unique facilities and treatment to obtain the same opportunities and benefits to achieve equality and justice. Everyone has the right to social security that allows his whole development as a dignified human being."

This shows how important health is for human beings, so it must be regulated in the constitution, which is the highest legal regulation in a country. To provide health to all human beings, health workers must have a standard. These standards are described in various provisions, including, among others, educational, competency, work, and other standards. One of them is carried out by conducting a Competency Test to obtain these standards. The purpose of

implementing the Competency Test is to find out how far the competencies already possessed by a graduate of higher Education are with their expertise. This study aims to discover the Competency Test's meaning and concept and its implementation in the healthcare profession.

RESEARCH METHOD

This research is normative juridical research, which will study the written legal norms regulated by applicable laws and regulations. In this case, the study is carried out on the norms of the Competency Test which are regulated in various laws and regulations currently in force, both those that regulate in general and particular provisions for Competency Tests in the health sector.

As normative research, this research uses secondary data based on primary legal material, a collection of applicable laws and regulations. These laws and regulations consist of several laws based on preliminary literature searches governing the Competency Test, in this case including "Law No. 20 of 2003 concerning the National Education System"; "Law No. 12 of 2012 concerning Higher Education"; "Law No. 29 of 2004 concerning Medical Practice"; "Law No.20 of 2013 concerning Medical Education"; "Law No. 36 of 2014 concerning Health Workers"; "Law No. 38 of 2014 concerning Nursing"; and "Law No. 4 of 2019 concerning Midwifery". In addition, this study also conducted a study of several laws and regulations under the Law governing the Competency Test

As a limitation, it should be stated that this research is limited to Competency Tests in the health profession and not to other Competency Tests, such as Competency Tests organized by BNSP or by Professional Organizations outside the health profession, Functional Competency Tests in the context of fill certain positions, even though the position is related to placement with the health worker profession in certain positions or other types of Competency Tests that are not related to the professional Competence of health workers.

The analysis was carried out qualitatively. With qualitative analysis, the optimum explanation of the meaning and concept of the Competency Test of the health professional profession as a whole can be obtained. The results of the analysis will be realized in the form of a description of the results of the study regarding the overall Competency Test arrangement based on the data used for further conclusions drawn.

RESULTS AND DISCUSSIONS

As mentioned above, preliminary research on Competency Tests conducted for the health professional profession has found mention of the term Competency Test in:

- a. "Law No.20 of 2003 concerning the National Education System" (National Education System Law);
- b. "Law no. 29 of 2004 concerning Medical Practice" (Medical Practice Law);
- c. "Law No.12 of 2012 concerning Higher Education" (Higher Education Law);
- d. "Law No.20 of 2013 concerning Medical Education" (Medical Education Law);
- e. "Law No. 36 of 2014 concerning Health Workers" (Health Workers Law);
- f. "Law No.38 of 2014 concerning Nursing" (Nursing Law); and
- g. "Law No. 4 of 2019 concerning Midwifery" (Midwife Law).

In addition to the seven laws, the mention of the Competency Test can also be found in:

- a. "Government Regulation No. 51 of 2009 concerning Pharmaceutical Work" (PP51/2009);
- b. "Regulation of the Minister of Health of the Republic of Indonesia No. 889/Menkes/Per/V/2011 concerning Registration, Practice Permits, and Work Permits for Pharmaceutical Workers" as amended by "Regulation of the Minister of Health of the Republic of Indonesia No. 31 of 2016 concerning Amendments to Regulations Minister of Health No. 889/Menkes/Per/V/2011 concerning Registration, Practice Permits, and Work Permits for Pharmaceutical Workers" (Permenkes 889/2011);

- c. "Regulation of the Minister of Research, Technology, and Higher Education of the Republic of Indonesia No. 18 of 2015 concerning Procedures for Implementing Competency Tests for Students of the Professional Doctor or Dentist Program" (Permenristekdikti18/2015);
- d. "Regulation of the Minister of Education and Culture of the Republic of Indonesia No. 2 of 2020 concerning Procedures for Implementing Student Competency Tests in the Health Sector" (Permendikbud2/2020).

The Competency Test based on the National Education System Law is regulated in Article 61. The complete provisions of Article 61 of the National Education System Law are presented as follows:

"Article 61"

- (1) Certificates in the form of diplomas and certificates of Competence.
- (2) Diplomas are given to students as an acknowledgment of learning achievement and/or completion of a level of Education after passing an exam administered by an accredited educational unit.
- (3) Competency certificates are given by education providers and training institutions to students and community members as an acknowledgment of Competence to perform specific jobs after passing a competency test administered by an accredited educational unit or certification body.
- (4) Provisions regarding certification as referred to in paragraph (1), paragraph (2), and paragraph (3) shall be further regulated by government regulation."

Article 61 of the National Education System Law explicitly states that the Competency Test is a way to obtain a Competency Certificate. The Competency Test can be carried out by an accredited higher education unit or certification body. The first are institutions under the Ministry in charge of Education (either Mendikbud, Mendikti, Menristekdikti, Mendikbuddikti or Menristekdikbud and other names from the ministries in charge of Education); and the latter is the Professional Certification Institute under the National Professional Certification Agency (BNSP). It should be noted that the regulation on certification, as referred to in Article 61 paragraph (4) in the form of a Government Regulation, has resulted in Government Regulation No.23 of 2004 concerning the National Professional Certification Agency, which was subsequently replaced by Government Regulation of the Republic of Indonesia No.10 of 2018 concerning National Agency for Professional Certification. National Professional Certification (BNSP).

Historically and chronologically, the following provision that is still in effect, which mentions the Competency Test is the Medical Practice Law. In the provisions of Article 1 point 4 of the Medical Practice Law, it is stated that a "Certificate of competence is a letter of acknowledgment of the ability of a doctor or dentist to practice medicine throughout Indonesia after passing the competency test." The formula explains again that the Competency Test entitles the participants who pass to obtain a Competency Certificate. So far, the two arrangements are still in sync by stating that the Competency Test participants who pass will be given a Competency Certificate. The following provision that regulates the Competency Test is the provision of Article 44, paragraph (2) of the Higher Education Law. In total, the provisions of Article 44 of the Higher Education Law say:

"Article 44"

- (1) A competency certificate is an acknowledgment of Competence for the achievements of graduates in accordance with their expertise in their branch of knowledge and/or having achievements outside their study program.
- (2) The certificate of Competence, as referred to in paragraph (1), is issued by the Tertiary Education Institution in collaboration with professional organizations, training institutions, or accredited certification bodies to graduates who pass the competency test.
- (3) The certificate of Competence, as referred to in paragraph (2), can be used as a condition for obtaining certain jobs.

- (4) Individuals, organizations, or higher education providers without rights are prohibited from providing competency certificates.
- (5) Further provisions regarding competency certificates are regulated in a Ministerial Regulation."

The provisions of Article 44 of the Higher Education Law are still in line with stating that Competency Test participants who pass will be given a Competency Certificate. However, there has yet to be any regulation regarding implementing the Competency Test itself.

In the provisions of the Elucidation of Article 17 paragraph (2) of the National Education System Law, it is stated that "Cooperation with Ministries, other Ministries, LPNKs, and professional organizations, includes setting competency standards, determining graduate qualifications, curriculum preparation, use of learning resources, and competency testing. Thus, the Competency Test for Professional Education can be implemented by universities in collaboration with the Ministry of Education, other technical ministries, LPNKs, and professional organizations responsible for the quality of professional services. From the UN provisions, it can also be said that the Competency Test is made with the aim of providing good quality professional services.

The Competency Test in Medical Education Law is regulated from Article 36 to Article 39. However, only Article 36 and Article 39 explicitly regulate the Competency Test. The formulation of Article 36 and Article 39 of the Medical Education Law states:

"Article 36"

- (1) To complete the doctor or dentist professional program, students must pass a national competency test before taking the oath as a doctor or dentist.
- (2) Students who pass the competency test shall obtain a professional certificate from the tertiary institution, as referred to in paragraph (1).
- (3) The competency test of a Doctor or Dentist, as referred to in paragraph (1), is carried out by the Faculty of Medicine or the Faculty of Dentistry in collaboration with associations of medical or dental education institutions in coordination with Professional Organizations.
- (4) Further provisions regarding the procedure for implementing the competency test as referred to in paragraph (3) shall be regulated in a Ministerial Regulation."

"Article 39"

- (1) Students of the primary care doctor program, specialist-sub-specialist doctors, and specialist-sub-specialist dentists must take the competency test for primary care doctors, sub-specialist doctors, and specialist-sub-specialist dentists nationally in order to recognize the achievement of professional Competence of doctors. Primary care, specialist-sub-specialist and specialist-sub-specialist dentists.
- (2) The competency test, as referred to in paragraph (1), is carried out by the Faculty of Medicine or the Faculty of Dentistry in collaboration with associations of medical or dental education institutions and coordination with Professional Organizations."

In the Law that regulates the profession of doctors and dentists explicitly, it is clearly and unequivocally stated that a Competency Test is required so that a student can complete a professional program for a doctor or dentist, the profession of primary care physician, specialist-sub-specialist, and specialist-sub-specialist dentist. . The Competency Test is carried out in collaboration with associations of medical or dental education institutions and coordination with professional organizations. The note here is that the results of the Competency Test are no longer a Competency Certificate but a Professional Certificate.

The following Law that regulates the Competency Test is the Health Law. This Health Law applies to health workers as stated in Article 11 of the Health Law, except for medical personnel consisting of doctors and dentists, including primary care doctors, sub-specialist doctors, and sub-specialist dentists. The health workers referred to are the group of "clinical psychology personnel," "nursing personnel," "midwifery personnel," "pharmaceutical personnel," "public health personnel," "environmental health personnel," "nutritionist"; "physical therapy personnel";

"medical technician"; "biomedical engineering personnel"; and "traditional health workers," with the possibility of the emergence of other groups of health workers.

In the provisions of the Healthcare Law, which is the Law that regulates Health Workers, the formulation of Article 1 point 6 of the Healthcare Law expressly defines Competency Test, namely, "Competency Test is the process of measuring the knowledge, skills, and behavior of students at higher education institutions. Which organizes higher education in the field of Health." Something is interesting from the definition given next, namely in the provisions of Article 1 point 7 of the Health Law where it says, "Certificate of Competence is a letter of recognition of the Competence of Health Workers to be able to practice throughout Indonesia after passing the Competency Test." Meanwhile, Article 1 point 8 of the Health Law states that a "Professional Certificate is a letter of acknowledgment to carry out professional practice obtained by graduates of professional education." without any mention of "after passing the Competency Test." However, the provisions of Article 21 of the Health Law state:

"Article 21"

- (1) Students in the health sector at the end of their vocational and professional Education must take a national competency test.
- (2) The Competency Test, as referred to in paragraph (1), shall be conducted by Tertiary Education Institutions in cooperation with Professional Organizations, training institutions, or accredited certification bodies.
- (3) The Competency Test, as referred to in paragraph (2), aims to achieve graduate competency standards that meet work competency standards.
- (4) The standard of work competence, as referred to in paragraph (3), is prepared by the Professional Organization and the Council of each Health Worker and determined by the Minister.
- (5) Vocational education students, as referred to in paragraph (1), who pass the Competency Test shall obtain a Competency Certificate issued by the Tertiary Education Institution.
- (6) Professional education students, as referred to in paragraph (1), who pass the Competency Test shall obtain a Professional Certificate issued by the Tertiary Education Institution.
- (7) Further provisions regarding the procedures for implementing the Competency Test shall be regulated by a Ministerial Regulation that administers government affairs in the field of Education."

Thus, it is clear that the result of passing the Competency Test for Vocational Education students is a Certificate of Competence. For those who pass the Competency Test for Professional Education, it is a Professional Certificate. It is just that it is slightly different from the provisions stipulated in the Medical Education Law; Competency Tests are held by universities in collaboration with professional organizations, training institutions, or accredited certification bodies without involving educational institution associations. In this provision, it is also apparent if the Competency Test is carried out by referring to the Work Competency Standards, which are prepared by the Professional Organization and the Council of each Health Worker and determined by the Minister of Health. Thus, it becomes a question of a Competency Test being carried out without any Work Competency Standards.

According to Article 52 of the Health Law, the same applies to Health Workers of Indonesian Citizens who graduate from abroad and will practice in Indonesia. Article 52 of the Health Law reads as follows:

"Article 52"

- (1) Indonesian citizen health workers who will practice in Indonesia and who graduate from abroad must follow the competency evaluation process.
- (2) The competency evaluation process, as referred to in paragraph (1), is carried out through:
 - (a) administrative completeness assessment; and
 - (b) assessment of ability to practice.

- (3) The administrative equipment, as referred to in paragraph (2) letter a, shall at least consist of: (a) assessment of the validity of the diploma by the Minister who administers government affairs in the field of Education; (b) certificate of physical and mental health; and (c) statement letter to comply with and implement the provisions of professional ethics.
- (4) The assessment of the ability to carry out the practice, as referred to in paragraph (2) letter b, is carried out through a competency test following the provisions of the Laws and Regulations.
- (5) Indonesian Citizen Health Workers who graduated from abroad, passed the Competency Test, and will practice in Indonesia will receive STR."

The provisions in the Nursing Law and the Midwifery Law which regulate the Competency Test, are a copy-paste of the same provisions regulated in the Health Law, only more specific for the Nursing health profession in the Nursing Law and Midwifery Health workers in the Midwife Law. These provisions can be found in Article 16 of the Nursing Law and Articles 16 and 17 of the Midwifery Law.

As an implementation of the Higher Education Law and Medical Education Law, Permenristekdikti 18/2015 has been issued, which regulates the Professional Competency Test for Doctors and Dentists. Article 1 point 1 of Permenristekdikti18/2015 states that the "Competency Test is a national examination and assessment for students of the doctor or dentist profession program." The National Committee for Competency Testing was prepared to implement the Competency Test. The National Committee for Competency Testing, according to Article 1 point 2 of Permenristekdikti18/2015, is the implementing committee for the competency test for students of the doctor or dentist profession program. The provisions of Article 3 paragraph (1) Permenristekdikti18/2015 stipulate that "Competency Test Participants are students of the doctor or dentist profession program who are studying at the faculty of medicine or dentistry who have completed the entire learning process." Furthermore, Article 3 paragraph (3) of Permenristekdikti18/2015 it is stated that "Competency Test Participants as referred to in paragraph (1) who are declared to have passed will be given a professional certificate by the university and a competency certificate by the Professional Organization."

The provisions of Article 4 paragraph (1) of Permenristekdikti18/2015 reaffirm that "The competency test is carried out by the medical faculty and dentistry faculty in collaboration with the Association of Medical Education Institutions and coordination with Professional Organizations." Further provisions in Article 5 paragraph (1) of Permenristekdikti18/2015 strengthen the form of "cooperation between the faculty of medicine or dentistry and the Association of Medical Education Institutions as referred to in Article 4 paragraph is carried out through the establishment of the National Committee for Competency Testing." In the formulation of Article 5 paragraph (3), it is stated that "The National Committee for Competency Testing as referred to in paragraph (1) shall at least consist of the Association of Medical Education Institutions and representatives of the local committee in each faculty of medicine or dentistry," which according to Article 5 paragraph (4) is determined by the Minister in the field of Education.

The involvement of professional organizations in the Competency Test is stated in Article 6 paragraph (1) of Permenristekdikti18/2015 where "The National Committee for Competency Testing coordinates as referred to in Article 4 paragraph with Professional Organizations", in the scope of "a. quality control of the implementation of the Competency Test (before and after the implementation of the Competency Test); and b. submission of Competency Test results to issue competency certificates by Professional Organizations. From this provision, it is known that in addition to Professional Certificates issued by Higher Education, there are also Competency Certificates issued by Professional Organizations. This provision reaffirms the provisions stipulated in Article 3 paragraph (3) of Permenristekdikti18/2015.

As an implementation of the Health Law, the Nursing Law, and the Law on Fields other than the Higher Education Law, Permendikbud2/2020 was issued. In Article 1 point 1 of

Permendikbud2/2020, "The Health Sector Student Competency Test, from now on referred to as the Competency Test, is the process of measuring the knowledge, skills, and behavior of students at universities that provide higher education in the health sector." Same as the Health Law in the subsequent formulation in Article 1 point 2, which reads, "Certificate of Competence is a letter of acknowledgment of the competence of health workers to be able to practice throughout Indonesia after passing the Competency Test"; and Article 1 point 3 which states "Professional Certificate is a letter of acknowledgment to carry out professional practice obtained by graduates of professional education."

In the following provision, namely Article 2 paragraph (1) of the Minister of Education and Culture 2/2020, it is stated that "Students in the health sector at the end of the education period for vocational programs or professional programs must take a national competency test." Moreover, the provisions of Article 2 paragraph (3) of the Minister of Education and Culture 2/2020 further state that "The Competency Test as referred to in paragraph (1) aims to achieve graduate competency standards that meet work competency standards as health workers." In the provisions of Article 2 of Permendikbud2/2020, it is again shown the importance of the existence of Work Competency Standards as the basis for carrying out Competency Tests.

It is only in the provisions of Article 3 paragraph (1) of Permendikbud2/2020 that it is reaffirmed that "The Competency Test as referred to in Article 2 is one of the requirements for graduating students in the health sector from Higher Education." As a graduation requirement, according to Article 3 paragraph (2) of Permendikbud2/2020.

Determining the graduation of students in the health sector from Higher Education as referred to in paragraph (1) with the proportion of assessments:

- a. Vocational Program: Grade Point Average 60% (sixty percent); and Competency Test 40% (forty percent).
- b. Professional program: Grade Point Average for undergraduate or applied undergraduate programs 60% (sixty percent); and Competency Test 40% (forty percent)."

Article 4 paragraph (1) of the Minister of Education and Culture 2/2020 affirms that "Competency Test Participants are students in the health sector, vocational programs and professional programs who have completed the entire learning process." Furthermore, the provisions of Article 5 (1) of Permendikbud 2/2020 stipulate that "Universities in collaboration with Professional Organizations hold Competency Tests." provided that Article 5 paragraph (2) says, "In addition to cooperating with the Professional Organization as referred to in paragraph (1), the Competency Test can be held in collaboration with the Association of Health Higher Education Institutions." Regarding the Association of Health Higher Education Institutions, it is further stated that the AIPTK consists of "a. association of health study programs; b. health polytechnic association; and c. association/health Universities association," which "is a collection of higher education units that organize higher education/study programs in the health sector."

Regarding the activities of conducting the Competency Test, the provisions of Article 6 paragraph (1) of Permendikbud2/2020 stipulate that to conduct a Competency Test, the Minister of Education will establish a National Committee for Competency Testing. The National Committee for Competency Testing consists of the following:

- a. Supervisor, which consists of the following elements: (a) Ministry; (b) the Ministry that carries out government affairs in the health sector; and (c) the council of each health worker;
- b. Director, which consists of: (a) representatives of higher education leaders; (b) the head of the Professional Organization; and (c) chairman of the Association of Health Higher Education Institutions;
- c. Implementers, which consist of: (a) College; (b) Professional Organization; and (c) Association of Health Higher Education Institutions; and
- d. Financial management officer.

The duties of each section and the National Committee for Competency Testing are regulated in Article 7 of Permendikbud2/2020. Furthermore, the Director General in charge of Higher Education at the Ministry of Education determines the technical instructions for implementing the Competency Test. The costs of administering the Competency Test are integrated with the education costs for vocational programs or professional programs following the provisions of laws and regulations, provided that "fund receipts obtained from the registration of test participants Competence is non-tax state revenue whose use is carried out under the provisions of the legislation.

The results of the Competency Test are sent to the Universities for the issuance of Competency Certificates or Professional Certificates. Article 10, paragraph (1) of Permendikbud2/2020 stipulates that "Competency Test participants who are declared to have passed are entitled to: a. Certificate of Competence, for participants who come from students in the health sector of the vocational program; or b. Professional Certificate, for participants from students in the health sector of the professional program." In Article 10, paragraph (2) of Permendikbud2/2020, it is further stated that "Higher Education issues certificates of Competence or Professional Certificates following the provisions of laws and regulations." Furthermore, according to Article 11 paragraph (1) Permendikbud2/2020, "Competency Test participants who do not pass can take the Competency Test in the next period until the study period is following the National Higher Education Standards."

In addition to the above provisions, the researcher also found a provision for a Competency Test in the Government Regulation of the Republic of Indonesia No. 51 of 2009 concerning Pharmaceutical Work (PP51/2009). What is interesting about PP51/2009 is the provision in Article 37 PP51/2009 which reads:

"Article 37"

- (1) Pharmacists who carry out Pharmaceutical Work must have a professional competence certificate.
- (2) Pharmacists who have just graduated from professional Education can obtain a certificate of professional Competence directly after registering.
- (3) The professional competency certificate validates 5 (for five) years. It can be extended every 5 (five) years through a professional competency test if the Pharmacist continues to carry out Pharmaceutical Work.
- (4) Further provisions regarding the procedure for obtaining the competency certificate as referred to in paragraph (1) and the procedure for professional registration as referred to in paragraph (2) shall be regulated by a Ministerial Regulation."

What is interesting about this formulation is that for pharmacists, there is no Competency Test because they are entitled to a Professional Competency Certificate when they graduate from professional Education after registering. The Competency Test is only carried out five years later if the Pharmacist is still doing pharmaceutical work. Further arrangements are left to the Minister of Health.

As a follow-up to PP51/2009, Permenkes 889/2011 was issued. In the provisions of Article 1 point 5 of Permenkes 889/2011, the term Professional Competency Certificate mentioned in PP51/2009 is used as a term defined as "a letter of recognition of the competence of a pharmacist to be able to carry out his work/professional practice throughout Indonesia after passing the competency test." What attracts attention is the provision of Article 9 paragraph (1) of the Minister of Health 889/2011, which states.

"Article 9"

- (1) The professional competency certificate, as referred to in Article 7 paragraph (1) letter b, shall be issued by a professional organization after passing the competency test.
- (2) The certificate of professional Competence is valid for 5 (five) years, and a competency test can be conducted again after its expiration date."

This provision is interesting because Professional Competency Certificates are not issued by universities but by professional organizations. In connection with the passing of the Competency Test itself, Article 10 of the Minister of Health 889/2011 stipulates:

"Article 10"

- (1) Pharmacists who have just graduated from professional Education are considered to have passed the competency test and can directly obtain a certificate of professional Competence.
- (2) The application for a certificate of Competence, as referred to in paragraph (1), shall be submitted by the tertiary institution collectively 1 (one) month before the inauguration and oath of a new Pharmacist.
- (3) Professional organizations must notify KFN of competency certificates issued no later than 2 (two) weeks prior to the inauguration and oath of pharmacists."

The provisions of Article 10 of Permenkes 889/2011 are similar to Article 37 PP51/2009, which expressly states that there is no Competency Test for pharmacists who have just graduated because they are considered to have passed the Competency Test and are entitled to a Professional Competency Certificate issued by professional organizations. If you read the provisions of Article 11 paragraph (1) of the Minister of Health 889/2011, which stipulates that "Professional organizations carry out the competency test through the weighting of the Professional Credit Unit (SKP)," it can be understood that the Competency Test for pharmacists is not a Competency Test as regulated in the previous regulation. Competency Test for pharmacists is the weighting of SKP after the end of the five years of issuance of the Professional Pharmacist Competency Certificate, provided that the Pharmacist concerned is still carrying out his pharmaceutical work.

In an issue entitled Technical Instructions for e-STR - Electronic Registration Certificate for Health Workers, issued in 2021, it can be seen that the Competency Test for Health Workers has been implemented. The table can be seen below;

Health workers (Group/Type)	Study Program	Start Competency Test	
	OP	National Committee	
Clinical Psychology	Not yet Ukomnas		
Nursing	D3	August 1, 2013	
Nurse	D4	January 1 2015	24-26 November 2018
	Ners		August 1, 2013
Midwifery	D3	August 1, 2013	
Midwife	D4	January 1 2018	24-26 November 2018
Pharmaceutical	Profesi		24-26 November 2018
Pharmacist	Profession	2013	
Technical Personnel	D3	Not yet Ukomnas	
Pharmaceutical			
Public health			
Health Epidemiologist	Not yet Ukomnas		
Health Promotion and Behavioral Science	Not yet Ukomnas		
Health Counseling Behavior	Not yet Ukomnas		
Work			
Environmental Health	D3	August 24, 2019	24-26 November 2018
Environment sanitation	D4	August 24, 2019	24-26 November 2018
Health Entomologist			
Nutrition	D3	2018	24-26 November 2018
Nutritionist and Dietitian	D4	2019	24-26 November 2018
	Profession	2020	
Physical Therapy	D3	November 2019	16-17 November 2020
Physiotherapist	D4	November 2019	16-17 November 2020
	Profession	May 2018	

Teraoist Association			
Speech Therapist	D3		
Acupuncture	D4	November 24, 2018	24-26 November 2018
Medical Technician			
Medical Recorder and health information	D3	November 25, 2018	24-26 November 2018
Cardiovascular Engineering	D3	Not yet Ukomnas	
Service Technician	D3	Not yet Ukomnas	
Optimistic	D3	November 24, 2018	24-26 November 2018
Refractionist Nursing	D4	November 2018	
Anesthetist	D3		16-17 November 2020
	D4	November 2018	16-17 November 2020
Dental and Oral Therapist	D3	November 24, 2018	24-26 November 2018
	D4	November 2018	24-26 November 2018
Audiologist			
Biomedical Engineering			
Radiographer	D3	November 24, 2018	24-26 November 2018
	D4	November 2018	
Electromedical	D3	November 24, 2018	24-26 November 2018
Tech Expert	D3	January 1 2018	24-26 November 2018
Medical Laboratory	D4	January 1 2020	24-26 November 2018
Medical Physicist	D4	Not yet Ukomnas	
Prosthetic Orthotic	D3	October 24, 2020	
	D4	October 24, 2020	
Traditional Barriers			
Herbal Medicine	D3	November 2018	

Taken from (Ministry of Health, 2021) from a book entitled e-STR Technical Instructions - Electronic Registration Certificate for Health Workers. In addition, if you look at the site <https://dikti.kemdikbud.go.id/uji-kompetensi/>, you can also find out the types of health workers who have done the Competency Test.

CONCLUSION

From the descriptions and explanations given above, it can be seen that although the implementation of the Competency Test has been carried out, there are still differences in its implementation. The Competency Test for doctors and dentists is carried out based on regulations issued by the Minister in the field of Education. However, the implementation guidelines refer to the Medical Education Law. On the other hand, for other health workers, apart from pharmacists, the Competency Test has also been carried out based on the Regulations issued by the Minister in charge of Education but refers to the Health Law. It should be added as a note that medical personnel, namely doctors and dentists, based on the decision of the Constitutional Court No. 82/PUU-XIII/2015, have been declared not as part of health workers, even though in Law No.36 of 2009 regarding Health, they are still part of the health workforce. However, regarding pharmacists as health workers, according to Article 11 of the Health Law, it is necessary to conduct a thorough study of the Competency Test of pharmacist health workers.

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