

LEGAL REVIEW OF ODONTOGRAM MEDICAL RECORDS AS AN IDENTIFICATION TOOL IN LEGAL EVIDENCE IN COURT

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Abstract

Odontogram medical records play a role in documenting dental and oral conditions as a basis for establishing a diagnosis, treatment planning, and legal evidence in medical disputes. This study aims to analyze the legal regulations regarding odontogram medical records as part of medical documents according to Indonesian law, the evidentiary power of odontogram medical records as a means of identification in the judicial process, and the legal responsibility of medical personnel for the validity of odontogram medical records in legal evidence in court. This study uses a normative juridical study type. This study is descriptive and analytical using various types of secondary data and is analyzed deductively qualitatively. The study findings indicate that the legal regulations for odontogram medical records in Indonesia are regulated in Law No. 17 of 2023 concerning Health along with Government Regulation No. 28 of 2024 and Minister of Health Regulation No. 24 of 2022 concerning Electronic Medical Records emphasizes the aspects of completeness, accuracy, security, and data integration. The evidentiary power of odontogram medical records as an identification tool in the judicial process to provide objective, specific, and verified scientific information regarding a person's identity through the condition of the teeth and oral cavity.

Keywords: Forensic Odontology, Odontogram, Legal Evidence, Medical Records.

INTRODUCTION

Article 28 H Paragraph (1) of the 1945 Constitution, everyone has the basic right to health and the ability to live a meaningful life both physically and spiritually (Naurah, Simarmata, & Jambak, 2024). The main evidence to determine the truth or falsity of an alleged action is medical records. The existence of medical records as evidence often gives rise to various legal problems related to the integrity and validity of the medical records themselves. The credibility of medical records as evidence can be affected by differences in data, falsification, or deletion of information (Gunawan Widjaja, 2025). The identification of unidentified remains resulting from natural disasters, accidents, homicides, suicides, or other events is a process known as forensic identification. Identification of unidentified remains is crucial, as it aims to accurately and scientifically confirm identity for legal accountability (Sembel, Khoman, & Supit, 2023). Identification of remains resulting from accidents and homicides can be facilitated by forensic odontology. The durability of teeth as identification materials stems from their being the hardest part of the human body, making them ideal for use in any environment. The accuracy of the examination and documentation in the official document, the *Visum et Repertum* (VeR), is a crucial factor in the accuracy of identification (Utomo, Arnawati, & Syamsun, 2025).

The content of Electronic Medical Records can be developed by Health Service Facilities in accordance with health service requirements, as stipulated in Article 27 paragraph (4). This means that medical records can contain additional information, such as odontograms for patients receiving dental services. The inclusion of odontograms is very important because it systematically documents the condition of the teeth and mouth, serves as a basis for establishing a diagnosis, planning treatment, and providing legal evidence in medical disputes. The quality of service, patient safety, and accountability of medical personnel can be maintained through the implementation of standardized and comprehensive medical record recording. The availability of data for forensic identification purposes can be increased (Ministry of Health of the Republic of Indonesia, 2022). Forensic odontology is a method involving the collection of medical records, dental examinations, and analysis of dental evidence to confirm a person's identity. Dentists are crucial to the dental identification process. This identification method has been widely used since before the birth of Christ and is as accurate as fingerprints. Teeth and bones are classified as rigid tissues

that are highly resistant to environmental changes, can withstand temperatures up to approximately 900°C, and are relatively resistant to damage during storage. This method is more effective than fingerprints and is useful in certain situations. Teeth are often the only remains that can be used to identify a person. Teeth are a crucial instrument for forensic identification (Ramadhani, Adriano, & Chomariyah, 2023). Circular Letter No. SE004/PB PDGI/X/2025, which concerns the completion of odontograms in electronic medical record applications, also describes systematic dental recording. Every medical professional is required to create medical records in accordance with Article 296 of Law No. 17 of 2023. An odontogram is defined as an essential component of these medical records. Due to its extensive benefits, including forensic identification, legal evidence in court, comprehensive medical documentation, referrals between healthcare professionals, and the provision of important data for studies, completing an odontogram has become standard practice in many developed countries. Consequently, the legal and clinical aspects of dental health services are strengthened by recording an odontogram, in addition to fulfilling administrative obligations.

Every person has a unique legal identity that distinguishes them from others. By establishing universally applicable standards, the most significant, easily understood, and immediately implementable approach to address this issue is to improve or establish comprehensive, uniform, and easily understood dental records (odontogram) for medical professionals, paramedics, law enforcement, and the general public. Dental records can now be created at a reasonable cost, regardless of whether they are recorded manually in patient records, digitally, or electronically (Soepriadi & Kusumaningrum, 2022). This is a finding of technological and scientific advances. Healthcare facilities are required to thoroughly and clearly document all actions carried out in maintaining medical records in accordance with Article 780 of Government Regulation No. 28 of 2024 concerning the Implementing Regulations of Law No. 17/2023 concerning Health. They are required to ensure the security, integrity, confidentiality, and availability of data contained in medical records, as well as the preservation of patient medical record data and information. They must ensure that electronic systems are compatible with the variables and metadata established by the ministry responsible for government affairs in the health sector, and that various electronic systems are able to communicate through data exchange standards and function cohesively (Ministry of Health of the Republic of Indonesia, 2024).

The urgency of this study lies in the increasing need for valid and accurate identification tools in the legal evidence process in cases involving the identification of disaster victims, criminal acts, and medical disputes. Odontogram medical records, as a systematic record of a person's dental condition, have high distinguishing value and can serve as strong scientific evidence in court. However, understanding of the legal basis, procedures for use, and the strength of their evidence remains limited among law enforcement and medical personnel. This study is crucial for legally examining the position of odontogram medical records as an identification tool in legal evidence, thereby contributing to the development of more accurate, objective, and equitable judicial practices. Based on the explanation above, this study was carried out with the aim of analyzing the legal regulations regarding odontogram medical records as part of medical documents according to laws and regulations in Indonesia, the evidentiary power of odontogram medical records as a means of identification in the judicial process, as well as the legal responsibility of medical personnel for the validity of odontogram medical records in legal evidence in court.

LITERATURE REVIEW

Theory of Legal Certainty

Sudikno Mertokusumo (2013: 145) states that law enforcement must consider three factors: legal certainty, utility, and justice. The application of applicable laws or regulations, legal certainty, is the foundation of a nation. Legal certainty can also refer to something that can be determined by law, according to Van Apeldoorn. Legal certainty is the guarantee that the law is enforced, that those entitled to their rights will be able to obtain them, and that the law will protect against arbitrary actions (Manullang, 2016: 14).

Legal Proof Theory

R. Subekti (2020:1) argues that the act of proving is to convince the judge regarding the validity of the arguments or arguments put forward in a dispute. According to Muhammad at Thohir Muhammad Abd al Aziz, the process of proving a case involves providing information and arguments intended to convince others. Proving a case involves presenting convincing reasons and arguments, as according to Sobhi Mahmasoni. This implies that the problem is resolved or decided through the study and arguments presented (Anshoruddin, 2004:25).

Theory of Legal Responsibility

The theory of legal responsibility emphasizes more on the definition of responsibility derived from the provisions of Law and Regulations, thus interpreting the theory of responsibility as a form of obligation. Responsibility is a condition in which a person is obliged to accept the consequences of his actions if an unfavorable finding occurs and may be subject to legal action, retaliation, or prosecution (Azheri, 2011:35). Hans Kelsen's theory of legal responsibility states that when a person is legally responsible for a certain action or has legal responsibility, the subject is responsible for sanctions if a related action occurs (Kelsen, 2011:81). Hans Kelsen, (2015:140), categorizes responsibility into four categories: individual, collective, fault-based, and absolute.

METHOD

Study applies a normative legal study methodology. The purpose of a normative legal study is to identify legal definitions or bases through a systematic study of law (Bambang Sunggono, 2016:34). This study is descriptive and analytical, revealing laws and regulations related to the legal theory that is the subject of the study, as well as laws and regulations in their application to society related to the topic of study (Zainudin Ali, 2011:52). This study utilizes secondary data, including primary, secondary, and tertiary legal materials. This study was conducted through a literature review of existing written materials or documents, including official government documents, laws and regulations, criminal law study findings, and the perspectives of legal professionals. The data will be analyzed qualitatively after data collection, involving a thorough, comprehensive, and holistic literature review (Iskandar, 2022).

RESULTS AND DISCUSSION

Legal Regulations Concerning Odontogram Medical Records as Part of Medical Documents in Accordance with Indonesian Laws and Regulations

Minister of Health Regulation No. 24 of 2022 concerning Electronic Medical Records (EMR) in Indonesia establishes new regulations regarding medical records. This regulation underscores the importance of using secure, integrated, accurate, and comprehensive EMR to support more effective and efficient healthcare delivery. One of the most important aspects of PMK 24/2022 is the mandatory implementation of recognized international standards for the creation, administration, and storage of EMR. This is expected to improve the interoperability and readability of EMR within various existing healthcare information systems. This regulation also establishes more explicit guidelines for the security, privacy, and access rights of patient information in EMR, thereby enhancing the protection of patient personal data. This is particularly important in the context of contemporary healthcare provision, as health data security is crucial (Anjani & Abiyasa, 2023:6).

The ministry responsible for managing government affairs in the health sector is responsible for organizing medical records within the national health data management framework, as stipulated in Article 298 of Law No. 17 of 2023 concerning Health. Meanwhile, Article 300 paragraphs 1 and 2 of Law No. 17 of 2023 concerning Health also requires that medical and health workers maintain medical records when carrying out public health initiatives. These documents can be integrated into a patient data system integrated with the national health information system (Manela, Sawitri, & Prawestiningtyas, 2024). This regulation is expected to improve the overall quality of life of the community by ensuring that all individuals have access to affordable and adequate health services (Saragih & Sahlepi, 2024). In addition, Article 777 of Government Regulation No. 28 of 2024 concerning the Implementing Regulations of Law No. 17 of 2023 concerning Health requires that all health facilities must keep medical records. In accordance with Article 778 paragraph 3, which stipulates that medical records, as defined in paragraphs 1 and 2, are documents that record patient identity data, examinations, treatments, actions, and other services that have been provided to patients, including consent for health care actions (Ministry of Health of the Republic of Indonesia, 2024).

Compliance with constantly changing regulations and rules can be challenging (Ulfany, Yumanita, & Siregar, 2024). In the interest of justice, investigators handle victims of injury, poisoning, or death suspected of being the result of a crime, as stipulated in Article 133 paragraph 1 of the KUHAP. This relates to forensic medicine. Investigators are permitted to request information from forensic medicine experts, doctors, and/or other experts (Muhammad Wafii Ramadhan, 2024). Forensic odontology is a relatively new field of study that applies dental expertise to improve the justice system. Forensic odontology is responsible for the development of dental evidence, with the goal of providing scientific and objective data in legal proceedings. Teeth are the most robust and durable structures in the human body, capable of withstanding prolonged exposure to post-mortem effects, water, and fire. Furthermore, the materials often used in dental restorations are highly resistant to damage caused by physical, chemical, and biological factors (Sarwono, 2024).

Indonesian health sector regulations and criminal procedure law provide a strong and comprehensive normative foundation for legal regulations governing odontogram medical records as part of medical documentation. Healthcare facilities are required to retain odontogram medical records, which are considered official documents. These medical records serve not only as a source of support for medical services but also as valid legal evidence. This is emphasized by the provisions of Law No. 17 of 2023 concerning Health and its implementing regulations in Government Regulation No. 28 of 2024, as well as Minister of Health Regulation No. 24 of 2022 concerning Electronic Medical Records. These regulations prioritize data integration, security, accuracy, and completeness. To protect patient data and facilitate interoperability, it is crucial that these medical records are managed securely, integrately, and comprehensively, in accordance with international standards. This indicates that forensic odontology serves as a method of victim identification and scientific evidence in the judicial process, with public legal awareness influenced by knowledge, legal understanding, positive perceptions, and direct involvement through education, training, and practice.

The Evidential Strength of Odontogram Medical Records as an Identification Tool in the Judicial Process

The scope of dental forensic evidence includes pre-mortem dental records and identification. In forensic odontology, dental records, or pre-mortem data, are the primary evidence used in case investigations. Medical records are collected during the victim investigation process and include the individual's dental and general medical history (Rachman & Triwanto, 2022:154). To realize the right of the deceased to be returned to their families and buried according to their religion, identification of remains is performed for humanitarian purposes. Dental identification is a fundamental identification method often used in the identification process, alongside DNA and biometrics. The high degree of individuality of teeth makes them suitable for use as a means of identification (Annariswati & Agitha, 2021).

The Dental Medical Records Guide divides dental medical records into four categories: patient identification, odontogram sheets, treatment chart sheets, and additional/supporting appendices (Febiani & Fadly, 2022). Forensic odontology significantly impacts the identification of homicide victims. This identification is crucial for law enforcement, particularly in homicide cases. In Brazil, Annariswati & Agitha (2021) cited a case in which the body of an unidentified woman was identified due to dental anomalies. The body was estimated to be between 18 and 30 years old and was in a state of severe decomposition. The body's teeth were examined by a forensic odontologist, who discovered five missing teeth and a dental anomaly in the form of a displaced lower left canine. The forensic odontologist compared pre-mortem data and discovered a displaced lower left canine, which was also corroborated by information from the victim's family.

Additionally, Sembel et al., (2023) In the 2002 Bali Bombing case, 56% of victims were identified through their teeth. Furthermore, the percentage of traffic accident victims in Situbondo reached 60% in 2013, while the percentage of victims of the Garuda plane disaster in Yogyakarta reached 66.7% in 2002. Between 2010 and 2015, the Forensic Department of Prof. Dr. RD Kandou General Hospital in Manado conducted dental examinations to identify the deceased. The number of identified victims was still very limited, with only 8 of the 378 deceased identified through dental examinations. This was mainly due to incomplete medical records.

Forensic medicine is a field that serves to connect the legal and medical sectors. Forensic doctors can provide explanations that are admissible as evidence in court using a scientific approach, as in Article 184 of the KUHAP, which classifies expert testimony as valid evidence. Injuries, sudden death, and sexual violence are among the biological causes of criminal incidents that can be explained by forensic medicine. Elu & Yusuf, (2025), emphasized that forensic doctors not only act as expert witnesses but also as providers of initial data through *visum et repertum* which serves as the basis of evidence in trials. Article 184 of the KUHAP regulates witness testimony as evidence in criminal cases. This testimony is presented in the form of information related to criminal incidents witnessed, heard, and experienced by the witness, and is carried out to explain the basis of their knowledge. Expert witness testimony is defined in Article 1 of the KUHAP as information provided by someone who has special knowledge regarding matters necessary to clarify a criminal case for the purpose of examination. A person who possesses knowledge that is essentially owned by a particular individual cannot have special expertise as an expert witness (Siregar & Krisna, 2023).

Article 235 paragraph (1) of Law No. 20 of 2025, which relates to the KUHAP, stipulates that evidence includes witness statements, expert statements, letters, defendant statements, physical evidence, electronic evidence, judicial observations, and other evidence that can be used for evidentiary purposes in court, provided that they are obtained legally. This provision expands the provisions related to evidence in the KUHAP, which previously only recognized witness statements, expert statements, letters, and defendant statements, as in Article 184 of the KUHAP.

This identifies the adoption of a more transparent evidentiary system, the recognition of digital evidence, and the transition from the concept of instructions to judicial observations in accordance with contemporary legal, international, and technological practices. This update is also intended to improve the preservation of human rights, the effectiveness of law enforcement, and legal certainty (Rohman, 2026).

Forensic experts are crucial in assisting judges in finding material truth and delivering fair and accurate decisions. The evidentiary value of odontogram medical records as an identification instrument in the judicial process stems from their ability to provide objective, specific, and verifiable scientific information regarding a person's identity based on the condition of their teeth and oral cavity. This classification is further strengthened by Article 235 paragraph (1) of Law No. 20 of 2025 concerning the KUHAP. In forensic cases, such as the identification of disaster victims, murder, or other crimes where the condition of the body is difficult to identify, odontogram medical records have significant evidentiary value. A legitimate instrument for judges to evaluate the material truth of a case is the accuracy and validity of the odontogram prepared in accordance with dental procedures. The evidentiary power is enhanced by the testimony of a dental forensic expert, as it strengthens the connection between legal facts and medical data examined in court. Odontogram medical records are not only valuable medically, but also have strategic legal value in maintaining legal certainty and justice.

Legal Responsibility of Medical Personnel for the Validity of Odontogram Medical Records in Legal Evidence in Court

In accordance with laws and regulations that provide the legal basis for the implementation of medical record activities, maintaining medical records is an important part of the provision of health services (Putra & Sidi, 2023). Law No. 17 of 2023 concerning Health, Article 173 paragraph (1) letter c, requires medical institutions to store medical records, which can be made electronically. The use of electronic medical records is even required for all health facilities by Article 3 paragraph (1) of Minister of Health Regulation No. 24 of 2022 concerning Medical Records. Although it does not explicitly regulate the process of using digital data as evidence in medical criminal proceedings, these clauses highlight the importance of digital data in the provision of health services (Kembaren, Simarmata, & Zarzani, 2025).

In their capacity as medical personnel, Indonesian doctors are also required to provide assistance to law enforcement during the judicial process. Forensic medicine is responsible for helping judges understand the development of a case to enable more appropriate, fair, and accurate decision-making. In situations where someone is suspected of being a victim of a crime and has suffered injury, poisoning, or death, investigators are permitted to request information from forensic medicine experts or other doctors or experts. The obligations of doctors in the field of forensic medicine are in accordance with Article 133 paragraph (1) of the KUHAP. Forensic doctors are responsible for (Jovita & Kusumaningrum, 2022) :

1. medico-legal procedures as well as the code of ethics of the forensic medical profession, in addition to fulfilling the duties & responsibilities as a forensic expert.
2. Determine medical and medico-legal forensic diagnoses on living and deceased victims, manage cases by considering socio-legal and medico-legal factors, communicate with authorities and issue forensic certifications in accordance with relevant regulations.
3. Design, supervise, and process forensic medicine & morgue units within healthcare facilities.
4. Involved in hospital ethics teams and forensic case management teams.
5. In accordance with relevant legal regulations, serves as a lecturer and supervisor in the field of forensics, ethics & medicolegal issues.
6. By preparing scientific papers and presenting study findings, actively involved in the advancement of medical science, with particular emphasis on forensic, ethical & medicolegal issues.

Forensic experts are required to abide by their professional oath by conducting examinations, analyzing, concluding conclusions, preserving data, and maintaining confidentiality until a court issues a decision. The examination and analysis of test findings must yield findings that meet the criteria of truth. Three principles of professional quality for forensic experts are: They must maintain their professional competence through continuing education programs; they must present technically accurate statements in all written or oral reports, testimony, public speeches, or publications and must avoid misleading or inaccurate claims; and they must act impartially and refrain from taking any action that identifies bias or interest in a case, except for the correct interpretation of the facts and evidence (Rachman & Triwanto, 2022).

Forensic physicians are often called to testify in court as expert witnesses. In this capacity, the physician not only presents the findings of the examination but also scientifically interprets the medical findings to ensure they are

understandable to the jury, prosecutors, defense attorneys, and other parties in the trial. Interpretations of toxicology or other laboratory findings, estimates of time of death, the impact of injuries on the victim, and explanations regarding how the injuries occurred and the instruments used may all be included in the forensic physician's expert testimony (Napa & Yusuf, 2025).

Victim identification efforts are crucial for perpetrator identification. In reality, identifying perpetrators for crime victims whose identities are unknown or uncertain will be challenging. Consequently, confirming the victim's identity is crucial for resolving criminal cases. Article 133 paragraph (1) of the KUHAP regulates the role of forensic medicine in assisting investigations. This provision stipulates that investigators have the right to request the assistance of expert forensic doctors to investigate criminal incidents in the interests of justice (Widjaja & Rachman, 2022).

In the case of Ramadhani et al., (2023), involving alleged criminalization, forensic odontology has a unique advantage in being able to determine the age of the defendant during the trial. This case involved the alleged premeditated murder of an employee of PT Istaka Karya in 2018. The Forensic Odontology Team from the Faculty of Dentistry, Universitas Padjadjaran, in collaboration with RSPAD Gatot Subroto, Jakarta, conducted an age identification based on MG dental structure to determine that the defendant was a minor. The team used 5 dental methods, three bone methods, and pathological analysis of growth and development during this procedure. It was determined that MG was between 16 and 18.9 years old on March 9, 2020. In 2018, MG was stated to be 15.5 years old.

Medical personnel's legal responsibility for the validity of odontogram medical records as legal evidence in court stems from their obligation to compile, complete, and manage medical records completely, accurately, and procedurally, ensuring that the information contained therein can be used as valid evidence in court. The validity of odontogram medical records depends on the application of ethical codes, medico-legal procedures, and principles of forensic professionalism in the analysis and storage of patient data, in addition to the accuracy of the medical records. Odontogram medical records are an important tool in victim identification, criminal investigations, and expert testimony in court, providing legal certainty, accuracy, and objectivity in the judicial process.

CONCLUSION

Law No. 17 of 2023 concerning Health, along with its implementing regulations in Government Regulation No. 28 of 2024, establishes legal provisions for odontogram medical records as part of medical documents in accordance with Indonesian laws and regulations. These provisions are further strengthened by Minister of Health Regulation No. 24 of 2022 concerning Electronic Medical Records, which emphasizes the importance of data integration, security, accuracy, and completeness. In legal proceedings, the evidentiary power of odontogram medical records as a means of identification comes from its ability to provide objective, specific, and verifiable scientific information regarding a person's identity by examining the condition of the teeth and oral cavity. In a legal context, odontograms are classified as written evidence based on Article 184 paragraph (1) of the KUHAP, as an official document created by authorized medical personnel in carrying out their professional duties. This classification is further strengthened by Article 235 paragraph (1) of the KUHAP Number 20 of 2025. The legal responsibility of medical personnel for the validity of odontogram medical records as legal evidence in court is rooted in the obligation of doctors and medical personnel to compile, complete and manage medical records completely, accurately and in accordance with procedures, ensuring that the information contained therein can be used as valid evidence in court.

The researchers suggest that the standard use of odontogram medical records as evidence in judicial proceedings requires more detailed and technical regulations. This could be achieved by establishing shared guidelines and regulations between healthcare institutions and law enforcement officials, in accordance with the study's findings. To ensure uniform application of the law and optimize the function of odontogram medical records as a legally responsible and valid form of evidence, additional education and training are needed for medical personnel and law enforcement officials.

REFERENCES

- Anjani, S., & Abiyasa, MT (2023). *Digital Disruption and the Future of Medical Records*. Yogyakarta: Selat Media Partners.
- Annariswati, IA, & Agitha, SRA (2021). Dental Anomalies as a Means of Forensic Identification. *Indonesian Journal of Dentomaxillofacial Radiology*, 5 (1), 31–38.
- Anshoruddin, H. (2004). *Law of Evidence According to Islamic Procedural Law and Positive Law*. Yogyakarta: Pustaka Pelajar.

- Azheri. (2011). *Corporate Social Responsibility: From Voluntary to Mandatory*. Jakarta: PT Raja Grafindo Persada.
- Bambang Sunggono. (2016). *Legal Research Methodology*. Jakarta: Raja Grafindo Persada.
- Elu, N., & Yusuf, H. (2025). Review of the Contribution of Forensic Medicine to Evidence of Criminal Acts. *Jurnal Intelek Insan Cendikia*, 2 (8), 14186–14194.
- Febiani, L., & Fadly, F. (2022). Review of Completeness of Dental Medical Records in Pulp Necrosis Cases at Community Health Center X in 2022. *Journal of Medical Records and Health Information*, 2 (1), 28–35.
- Gunawan Widjaja. (2025). Legal Regulation of Medical Records Administration as Evidence in Legal Disputes. *Journal of Public Administration*, 3 (3), 100–108.
- Hans Kelsen. (2015). *Pure Legal Theory translated by Rasul Mutaqien*. Bandung: Nuansa & Nusa Media.
- Iskandar, MA (2022). Criminal Liability of Corporations as Subjects of Money Laundering Crimes. *Pakuan Law Review Journal*, 8 (4), 51–60.
- Jovita, AW, & Kusumaningrum, AE (2022). Legal Responsibilities of Doctors in the Field of Forensic Services in Making Visum Et Repertum (VER) for Criminal Cases of Immorality. *Indonesian Health Law Journal*, 2 (2), 121–131.
- Kelsen, H. (2011). *General Theory of Law and State translated by Rasisul Muttaqien*. Bandung: Nusa Media Publisher.
- Kembaren, NB, Simarmata, M., & Zarzani, R. (2025). Legal Aspects of Digital Evidence in Medical Criminal Cases in Healthcare Services in Hospitals. *Asian Journal of Healthcare Analytics*, 4 (1), 141–152.
- Ministry of Health of the Republic of Indonesia. (2022). *Regulation of the Minister of Health No. 24 of 2022 concerning Medical Records*.
- Ministry of Health of the Republic of Indonesia. (2024). *Regulation Number 28 of 2024 concerning the Implementing Regulations of Law Number 17 of 2023 concerning Health*.
- Manela, C., Sawitri, R., & Prawestiningtyas, E. (2024). Analysis of Medical Liability in the Era of Electronic Medical Records in Indonesia. *SOEpra: Journal of Health Law*, 10 (2), 301–310. <https://doi.org/doi.org/10.24167/shk.v10i2.11411301>
- Manullang, FM (2016). *Legism, Legality, and Legal Certainty*. Jakarta: Prenadamedia Group.
- Mertokusumo, S. (2013). *Indonesian Civil Procedure Law*. Yogyakarta: Cahaya Atma Pustaka.
- Muhammad Wafii Ramadhan. (2024). Inheritance of Palatine Rugae from Parents to Children as a Means of Forensic Odontology Identification in the Banjar Ethnic Group. *Journal of Dentistry*, 8 (1), 52–58.
- Napa, RF, & Yusuf, H. (2025). Legal Aspects in Forensic Medicine and Their Implementation in Indonesia. *Indonesian Journal of Intellectuals and Scholars*, 2 (4), 5364–5370.
- Naurah, G., Simarmata, M., & Jambak, RS (2024). Rights and Privacy of Hospital Patients in the Digitalization Era. *Comserva Journal*, 3 (12), 4798–4805.
- Putra, A., & Sidi, R. (2023). Legal Responsibilities of Third Parties and Hospitals for the Implementation of Electronic Medical Records. *Scientific Journal of Educational Sciences*, 6 (8), 6280–6289.
- Rachman, A., & Triwanto, K. (2022). *Multidisciplinary Bioethics*. West Java: Unhan RI Press.
- Ramadhani, GM, Adriano, & Chomariyah. (2023). Forensic Odontology as an Identification Method and Evidence in Court. *Journal of Health Law and Ethics*, 3 (2), 52–66.
- Rohman, MM (2026). The Validity of Internet of Things-Based Digital Evidence in Criminal Procedure Law According to Law Number 20 of 2025. *Journal of Cyber Law and Technology Regulation*, 1 (1), 12–24.
- Saragih, SN, & Sahlepi, MA (2024). Analysis Of Malpractice Criminal Acts Committed By Nurses From A Health Law Perspective. *UNEFA Conference*.
- Sarwono, AP (2024). The Role of Prosthodontics in Human Identification: A Forgotten Aspect in Forensic Odontology. *E-Gigi Journal*, 12 (2), 181–191.
- Sembel, CPD, Khoman, JA, & Supit, ASR (2023). Analysis of Completeness and Conformity of Odontogram Filling in Dental and Oral Hospital (RSGM) X in 2017-2019 with Dentistry Medical Record Guidelines. *E-Gigi Journal*, 11 (2), 293–299.
- Siregar, R., & Krisna, R. (2023). Legal Analysis of the Power of Forensic Expert Evidence in Serious Assault Crimes. *Journal of Social Science Research*, 3 (1), 9337–9349.
- Soepriadi, & Kusumaningrum, AE (2022). Dental Records as a Tool of Identification and Legal Evidence in Court. *Journal of Social Sciences, Education and Humanities*, 1 (1), 178–187.
- Subekti, R. (2020). *Law of Evidence*. Jakarta: Pradnya Paramita.
- Circular Letter Number SE004/PB PDGI/X/2025. (2025). *Circular Letter Number SE004/PB PDGI/X/2025 concerning Filling in Odontograms in Electronic Medical Record Applications*.

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- Ulfany, R., Yumanita, I., & Siregar, ARM (2024). Legal Protection for Dentists in Providing Medical Services. *Journal of Healthy and Prosperous Families* , 22 (2), 110–115.
- Utomo, DH, Arnawati, IA, & Syamsun, A. (2025). Implementation of National Standards for Odontology Examination at Bhayangkara Hospital, West Nusa Tenggara in 2022. *Jompa Health Journal* , 4 (1), 441–447.
- Widjaja, G., & Rachman, M. (2022). The Role of Forensic Doctors in Assisting in Handling Criminal Cases. *Journal of Law and Nation* , 1 (1), 1–8.
- Zainudin Ali. (2011). *Legal Research Methods* (2nd edition). Jakarta: Sinar Grafika.