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Policy Implementation and Public Communication in Indonesia's Free Nutritious Meal Program: A Critical Documentary Synthesis

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Abstract

Indonesia's Free Nutritious Meal Program (Makan Bergizi Gratis/MBG) is intended to support nutrition, education, social protection, and local food systems, but its documented implementation problems concern whether formal standards reach the actors empowered to act and whether beneficiary concerns receive a verifiable response. This article asks which formally assigned communication responsibilities in MBG governance can be mapped to accountable response processes, and where the documentary record leaves operational gaps. It applies a critical narrative policy analysis to a purposively assembled reference set of 25 legal, administrative, methodological, and scholarly sources, checked up to 22 October 2026, with different levels of source access (legal text, full text, abstract-level, and registry-level) made explicit; it is not a systematic review. Five governance priorities (policy clarity, coordination across delivery actors, inclusive two-way engagement, accountable transparency, and feedback-based monitoring) are theory-informed synthesis categories examined through cross-source comparison. Presidential Regulation No. 115 of 2025 already assigns communication-related responsibilities, making the central issue their operationalization rather than the absence of a formal mandate. The evidence has limits: local cases and early implementation reviews cannot establish nationwide MBG effects, and one frequently cited communication study contains inconsistencies between its abstract and statistical results. The article contributes a conceptual, unvalidated communication–accountability framework that connects the information recipient, the responsible decision-maker, verification of corrective action, and the response to beneficiaries, as an organizing device for this selected corpus only; no gap across the wider MBG literature or new accountability theory is claimed. The proposed monitoring indicators are provisional and require pilot testing. Communication can support implementation when linked to resources, decision authority, safety procedures, and corrective action; it cannot substitute for those capacities.

KEYWORDS
makan bergizi gratis; policy implementation; public communication; accountability; document analysis.

Introduction

The Free Nutritious Meal Program (Makan Bergizi Gratis/MBG) is a national nutrition intervention with intended implications for educational participation, household welfare, and local food production. The documented difficulties, however, lie in delivery and answerability: the literature reviewed below reports food-safety, logistics, coordination, and regulatory-coherence concerns. The specific governance question is therefore how information reaches the people empowered to address service failures. An official announcement dated 5 January 2025 states that delivery would begin on 6 January 2025 through Satuan Pelayanan Pemenuhan Gizi (SPPG), with staged implementation

following school schedules (Badan Gizi Nasional, 2025a). These stated objectives and arrangements establish the policy context, not evidence that nutritional or educational outcomes have already been achieved.

The legal framework must be read chronologically. Presidential Regulation No. 83 of 2024 established the National Nutrition Agency (Republic of Indonesia, 2024). Presidential Regulation No. 115 of 2025 subsequently specified MBG governance, including target groups, delivery arrangements, food safety, monitoring, financing, and procurement (Republic of Indonesia, 2025). Article 4 identifies students across specified educational settings, children aged six months to under five years, pregnant women, breastfeeding mothers, and an additional category covering educators and education personnel; detailed beneficiary provisions remain subject to implementing rules. This article focuses primarily on the school-delivery interface while recognizing that school-based channels alone cannot serve all MBG beneficiaries. The school interface is a useful governance case because it brings together the delivery unit (SPPG), its coordinating office (Kantor Pelayanan Pemenuhan Gizi, KPPG), local government, and school-based beneficiaries, so that the path from instruction to complaint to response can be traced across several actors (Republic of Indonesia, 2025, Arts. 14–16 and 43). Findings are not extended to non-school beneficiary groups.

Implementation research explains why a formal mandate does not ensure consistent practice. Standards, resources, implementer disposition, organizational arrangements, and inter-organizational relationships shape what happens after a policy decision (Edwards, 1980; O'Toole, 2000; Van Meter & Van Horn, 1975). Policy-regime perspectives further direct attention to whether governing arrangements sustain political commitments, coherence, and legitimacy (May, 2015). Accordingly, difficulties in a nutrition program should not automatically be diagnosed as failures of socialization: some originate in staffing, facilities, financing, incentives, or the design of delivery itself. These accounts say little, however, about whether a frontline concern reaches an actor authorized to decide and whether the resulting action is verified; this article treats that link as the point where implementation theory needs the transparency and collaborative-governance lenses introduced in Section 2.

Public communication is used here to mean the governmental function of informing, listening, and responding in the public interest, rather than electoral promotion or the production of favorable publicity (OECD Report on Public Communication, 2021). Operational communication connects implementers through instructions and escalation. Public-facing communication enables beneficiaries to understand service expectations, ask questions, and report problems. Risk communication explains verified hazards, uncertainty, and protective action. These functions overlap but require different audiences, authorities, and evidence standards. Each is translated into an analytical question used in extraction: for operational communication, who issues which instruction to which implementer, and through what escalation route; for public-facing communication, what information beneficiaries receive, which channels exist for questions or complaints, and which unit receives them; and for risk communication, who is authorized to speak, on what verified evidence, and with what protective instruction.

Early MBG literature can be grouped by focus and design. Agustini et al. (2025) examine government instruments and implementation challenges in Bandung, a local case. Suprapto et al. (2025) provide a policy implementation review that discusses food safety, logistics, regulatory coherence, and the absence of verified effects on stunting and anemia in early implementation. Pora et al. (2025) examine communication, resources, implementer disposition, and bureaucracy through documentary sources. Marzulina et al. (2025) frame the policy's benefits alongside barriers and policy recommendations. Among the four selected MBG publications, Pora et al. (2025) addresses communication explicitly. The material accessed for these publications does not establish a complete trace from concern receipt to an authorized, verified response; this access-bounded observation is not a finding about their uninspected text or the wider literature. They differ in design (local case, policy review, documentary study), their conclusions depend on the underlying studies and documents, and they should not be treated as independent nationwide impact evaluations or as independent confirmation of the same claim.

The gap addressed here is therefore not that communication has never been studied. Rather, within this bounded reference set, the studies above address implementation challenges, communication, or benefits separately, and implementation requirements, communication functions, and answerability are not consistently connected through a traceable account of who receives information, who can act, and how corrective action is verified. Transparency scholarship distinguishes the availability of information from its usefulness, while collaborative-governance scholarship explains the conditions for joint action among actors with unequal resources and authority (Ansell & Gash, 2008; Emerson et al., 2012; Fairbanks et al., 2007; Grimmelikhuijsen & Welch, 2012). The gap is claimed for this selected and unevenly accessed corpus only, not for the wider MBG literature available by the checking date. The contribution is an MBG-specific organization of established communication and accountability concepts, rather than evidence that these connections have not previously been made.

The guiding question is: which formally assigned communication responsibilities in MBG governance can be mapped to accountable response processes, and where does the documentary record leave operational gaps? Three assessable outputs follow, each tied to a step of the method in Section 3.3: (1) a mandate-to-actor map that distinguishes what regulations require from what published studies report (steps 1–4); (2) a cross-source explanation of communication and response gaps and their capacity constraints (step 5); and (3) a clearly labeled provisional indicator framework for subsequent empirical testing (step 6). The contribution is a context-specific conceptual synthesis: a decision sequence that links the information recipient, the authorized decision-maker, verified corrective action, and an explained response to the beneficiary. It differs from Pora et al. (2025), whose documentary analysis treats communication as one implementation factor, and from Suprapto et al. (2025), whose policy review centers on food safety, logistics, and regulatory coherence. It does not claim to have discovered a new universal theory, to demonstrate empirical effectiveness, or to have measured the causal effect of communication on MBG performance.

The analysis uses implementation theory as its main organizing perspective. Communication is examined alongside resources, dispositions, and organizational structure, rather than being elevated into a sufficient explanation of implementation (Edwards, 1980; Van Meter & Van Horn, 1975). O'Toole (2000) supports attention to complex implementation relationships.

Transparency and collaborative governance provide complementary lenses. Transparency concerns the accessibility, intelligibility, and timeliness of information; accountability additionally requires an identifiable actor to explain conduct and a mechanism for review and remedy. Publishing data does not automatically create those conditions (Fairbanks et al., 2007; Grimmelikhuijsen & Welch, 2012; Janssen et al., 2012). Collaborative governance concerns structured interaction, shared problem-solving, and the institutional conditions supporting joint action, not merely the presence of several organizations in a delivery chain (Ansell & Gash, 2008; Bryson et al., 2015; Emerson et al., 2012).

A final distinction concerns policy feedback. Mettler and Soss (2004) examine how policies shape citizenship and participation; they are not used as a direct test of collaborative governance. McConnell (2010) cautions against reducing policy success to a binary verdict. Together, these perspectives justify evaluating service delivery, participation, and institutional response separately, while remaining explicit about uncertainty.

The lenses are combined in a four-part conceptual map. Implementation theory identifies the conditions that shape delivery (standards, resources, disposition, and organizational arrangements). Public-communication functions (operational, public-facing, and risk communication) specify how information moves between those actors. Transparency and accountability concepts specify what must follow a communication: an identifiable responsible actor, a decision, a remedy, and verification. The observable documentary evidence for each part (legal provisions, published guidance, and reported study findings) is recorded in the extraction categories in Section 3.3. Implementation theory alone does not explain whether complaints reach authorized decision-makers, which is why the other lenses are added. Collaborative governance adds explanatory value beyond coordination where actors with unequal resources and authority must share problem-solving, because it directs attention to who convenes, who is heard, and how decisions are recorded; where it would merely describe several organizations in one delivery chain, it duplicates the coordination theme and is not invoked.

In this article an accountable response requires four elements: authorization, meaning that the responding actor is legally or administratively empowered to act; a documented decision; a remedy, or an explained refusal, communicated to the person who raised the concern; and verification that the corrective action was carried out. These four dimensions are used consistently in extraction (Section 3.3), in the synthesis, and in the indicators in Table 4.

Methods

Design and scope

This article combines a documentary policy analysis of legal and administrative texts with a critical narrative review of scholarly literature, carried out in the ordered steps set out in Section 3.3. It does not report interviews, surveys, observation, a registered systematic review, or a program impact evaluation. The corpus covers Indonesian legal and administrative documents and scholarly publications on MBG governance and its theoretical background; MBG-specific documents date from 2024 to 2026, and foundational theory is included where it bears on the analytical framework. The delivery setting is the school-delivery interface, and the unit of analysis is the legal provision or the reported finding. Document analysis supports interpretation of institutional purposes and limitations (Bowen, 2009), while thematic analysis provides guidance for organizing recurring issues and examining divergent evidence (Braun & Clarke, 2006). The five themes are theory-informed analytical categories, not claims of coding saturation.

Reference set and source access

The documentary synthesis retains an original corpus of 25 works, reduced from an earlier, larger set through a reference audit that removed secondary school-feeding reviews, institutional scoping reviews, and sources peripheral to the communication–accountability argument. Source identification was purposive. A work was eligible if it (i) bore directly on MBG governance, public communication, accountability, implementation theory, or document-analysis method; (ii) was a legal or official document, or a peer-reviewed or institutionally published work with a verifiable bibliographic record; and (iii) added a point not already supported by a stronger source. The earlier account describes targeted searches using MBG, Makan Bergizi Gratis, policy implementation, public communication, document analysis, and regulation or article identifiers, but no contemporaneous platform-by-platform search log, exact query combinations, search dates, or search-period filters is available. Search reproducibility therefore cannot be claimed. Identifiable source locations in the references include bgn.go.id, peraturan.go.id, peraturan.bpk.go.id, journal sites and DOI-linked publisher pages; these are source locations, not a verified list of all platforms searched. No search of Google Scholar, Garuda or Scopus is asserted without a record. The MBG-specific publication window represented is 2024–2026; foundational literature has no stated lower date restriction. These are corpus boundaries, not verified database filter settings. The number describes cited works, not database retrievals, screened records, or independent empirical datasets. The source-checking date was 22 October 2026. This date is an access boundary, not evidence of exhaustive coverage of all publications available by that date. An additional conceptual comparator, Bovens (2007), was consulted during this revision, bringing the cited reference set to 26; it was not part of the original MBG search and does not expand the four-study MBG comparison. The original corpus combines legal and official documents, empirical studies, and conceptual or methodological works. A primary/secondary designation is relative to analytical use and does not indicate study quality or 22 independent empirical datasets. Three works (Pora et al., 2025; Suprapto et al., 2025; Marzulina et al., 2025) are documentary or policy-review studies and are classified as secondary.

Source group	Number of cited works	Analytical use
Presidential regulations	2	Institutional basis and MBG-specific governance requirements
BGN administrative/official sources	3	Launch announcement, technical-guidance registry, and existence of remote-area guidance
OECD public-communication report	1	Public-communication definition and distinction from political communication
MBG-focused publications	4	Local analyses and policy/documentary reviews

Source group	Number of cited works	Analytical use
Implementation, governance, communication, and policy theory	13	Conceptual interpretation and critical comparison
Methods literature	2	Document analysis and thematic organization

Full page-level text was inspected for the launch announcement, the BGN guidance registry, relevant provisions of Presidential Regulation No. 115 of 2025, OECD's public-communication report, and the accessible pages of selected MBG publications. The full accessible text of Kondolele et al. (2025), including its regression tables, was examined because it is central to the communication argument. Indexed abstracts and publisher/institutional records supported bibliographic checks and the characterization of review-based sources. Access was not uniform: a registry entry confirms that guidance is listed, not every operative clause in the underlying document. Table 2 records the access basis of its core sources only. Appendix A inventories all 26 cited works; where the supplied record does not establish access depth, it is marked not documented rather than retrospectively assigned full-text status. As a decision rule, abstract-level and registry-level records were used only to state that a source exists, its design, and its reported main conclusion; they were not used to support claims about operative clauses, statistical results, or mechanisms, and such sources were not treated as independently verified full-text evidence.

Extraction, interpretation, and evidentiary rules

The analysis followed six ordered steps. (1) Policy questions were derived from the guiding question. (2) Sources were identified purposively and checked against the eligibility criteria in Section 3.2. (3) Access information was summarized where recoverable; a complete contemporaneous access log is not available. (4) The analysis was organized by one reviewer using the legal provision or reported finding as the unit and the following interpretive categories: source identity and access level, date and policy phase, actor and responsibility, communication function, reported implementation constraint, accountability mechanism (using the four dimensions in Section 2), and limits on inference. (5) Source claims were compared across five theory-informed themes (clarity, coordination, engagement, transparency, and adaptive monitoring) to identify convergence, divergence, and gaps; the themes were treated as theory-informed categories rather than inductively generated codes, and conflicting or counter-evidence is discussed in the manuscript rather than asserted to exist in an unavailable coding archive. (6) The framework and indicators were constructed from the identified gaps and labeled as proposals. No separate item-level coding or extraction archive was created; an assertion that every item was independently recorded or coded cannot be audited and is not made. The manuscript-level synthesis distinguishes four analytical statuses: legal mandate, reported observation, theoretical inference, or authors' proposal. Source credibility, method limitations, and temporal relevance were assessed qualitatively by recording source type, design, access level, and the policy phase applicable to each study's period; no formal quality score was assigned. Table 2 makes the main source-to-claim connections explicit, and descriptive findings, interpretive mechanisms, and proposals are separated throughout the results and discussion.

Three safeguards govern interpretation. First, regulations establish obligations and organizational arrangements but do not demonstrate compliance. Second, published local cases and narrative reviews are attributed to their authors and are not pooled as independent estimates of national prevalence. Third, international studies identify contextual considerations rather than transferable effect sizes for MBG. Where a publication contains conflicting claims, the inconsistency is reported instead of selecting only the favorable statement. No inter-coder reliability statistic, formal risk-of-bias score, PRISMA flow count, or field-derived finding is claimed.

Worked example (retrospective analytical illustration, not a recovered coding log). Unit: Article 8 of Presidential Regulation No. 115 of 2025, as represented in the legal-text analysis. Extraction: the provision includes indicators beyond beneficiary numbers, including nutritional status, school participation and food-poisoning events. Evidence label: legal mandate. Theme: adaptive monitoring. Accountability mapping: an indicator requirement is identified, but a complaint-specific decision, communicated remedy and verified completion are not demonstrated by that requirement. Comparison: the early policy-review concerns attributed to Suprapto et al. (2025) concern a different evidentiary and potentially temporal setting; they cannot establish compliance or noncompliance with the later regulation. Counter-evidence: Article 8 contradicts any blanket assertion that formal monitoring covers meals distributed only. Interpretation: retain the legal monitoring duty while treating actual data validity and corrective use as unverified. The linked response indicators in Table 4 are an authors' proposal, not an observed system.

Ethics and transparency

The analysis uses public documents and published literature without collecting identifiable participant data, and no human-participant data collection is reported. The institutional ethics determination is addressed in the Declarations. The evidence matrix below is the bounded synthesis record available with this manuscript; no unavailable dataset or unproduced extraction archive is promised.

Results and Discussions

Evidence map and policy chronology

The main pattern across the documents is that communication duties, delivery responsibilities, and monitoring indicators are formally assigned, whereas the documentary record contains little evidence on how they operate in practice: the regulation specifies roles and indicators, the launch announcement states intent, and the reviewed studies report constraints observed in particular places and periods. The chronology shows why this matters. The 2025 launch announcement predates Presidential Regulation No. 115 of 2025, which was established on 17 November 2025 (Badan Gizi Nasional, 2025a; Republic of Indonesia, 2025). Early implementation reviews must therefore be interpreted against the rules and conditions available during their observation or publication periods. The MBG studies in the reference set (Agustini et al., 2025; Marzulina et al., 2025; Pora et al., 2025; Suprapto et al., 2025) all carry 2025 publication dates; the records available here do not establish whether each observed conditions before or after 17 November 2025, so their findings are not treated as evidence of conditions under that regulation. Later regulation cannot retrospectively prove that earlier problems were resolved. The BGN registry also lists technical guidance for remote areas under Decision No. 31679 of 2026.

Because only the registry listing was accessed, this finding is limited to the document's documented registration: it indicates formal recognition of differentiated delivery contexts, but its operative clauses and implementation effectiveness were not assessed (Badan Gizi Nasional, 2026).

Table 2. Core source-to-claim matrix with evidence status

Source, type, and access basis	Evidence status and what the material supports	Inference boundary
Badan Gizi Nasional (2025a); official announcement (primary); page text	Documentary finding: launch scheduled for 6 January 2025; staged delivery and nutrition education stated.	Policy intent and starting arrangements, not measured outcomes.
Republic of Indonesia (2025); Presidential Regulation No. 115 (primary, legal); relevant legal provisions	Legal mandate: Arts. 8, 15–16, 23–26, 36, 41, and 43 specify indicators, roles, safety, risk, data, and local communication.	Formal mandate; no compliance rate inferred.
Badan Gizi Nasional (2025b, 2026); official registry (primary); registry-level access	Registry listing only: Decision No. 401.1/2025 and remote-area guidance No. 31679/2026 are listed.	Document existence/status on the registry; detailed clauses not independently assessed.
Agustini et al. (2025); local case study (primary); journal/indexed record	Reported observation: examines instruments and implementation challenges in Bandung.	Local focus; no extrapolation to all Indonesian delivery sites.
Suprapto et al. (2025); policy review (secondary); journal-page abstract	Reported observation (policy review): early food-safety, logistics, and regulatory-coherence concerns; direct nutrition effects remain unverified.	Policy review rather than independent causal evaluation.
Pora et al. (2025); documentary study (secondary); journal-page abstract and methods description	Reported observation (documentary study): communication, infrastructure, distribution, and digital-access issues.	Documentary study; not new nationwide observation.
Marzulina et al. (2025); policy review (secondary); journal record	Reported observation (policy review): frames benefits alongside barriers and policy recommendations.	Review-based argument; not an independent evaluation of MBG outcomes.
Kondolele et al. (2025); quantitative survey, non-MBG setting (primary); accessible article and regression results	Reported observation (non-MBG): message variable significant ($p = .001$); media variable nonsignificant ($p = .166$); actor-role variable nonsignificant, although the abstract favors communicator credibility and media effectiveness.	Non-MBG setting, 61 respondents, and internal inconsistencies between abstract and results limit transfer and interpretation.
OECD Report on Public Communication (2021); institutional report (primary); overview/executive summary	Documentary finding: defines communication as informing, listening, and responding; distinguishes it from political communication.	Comparative institutional evidence, not a direct test of MBG.

Policy clarity: a mandate-to-practice translation problem

Policy clarity involves more than stating MBG's objectives. Article 16 assigns SPPG the provision and distribution of meals and education or information on nutrition and food safety. Article 43(h) includes local-government support for coordinating and preparing communication management for relevant stakeholders (Republic of Indonesia, 2025). Communication is thus already present in the governance framework. The analytical question is whether each delivery setting translates these provisions into current, intelligible instructions and a usable allocation of responsibility. What the material inspected here does not establish is who issues the current version of instructions to each delivery actor and through which channel; the documents reviewed here contain no evidence bearing on that question.

Documentary gap: the reviewed sources supply no national measure of inconsistent instructions and no document-level demonstration of inconsistent messages. Theoretical risk: implementation theory identifies a plausible risk when changing beneficiary information, menus, calendars, or responsibilities reaches actors at different times (Edwards, 1980; Van Meter & Van Horn, 1975). Proposal: a version-controlled information hub, plain-language summaries, and actor-specific briefing are therefore proposals derived from this risk, not verified existing solutions. Message receipt should not be equated with comprehension; a short comprehension check would provide a more demanding implementation indicator.

Coordination: communication requires decision authority and capacity

The formal delivery chain differentiates BGN, Kantor Pelayanan Pemenuhan Gizi (KPPG), and SPPG. Articles 14–16 establish the delivery arrangement and place SPPG coordination and oversight within KPPG's remit, while Articles 23–25 distribute food-safety responsibilities and reporting requirements (Republic of Indonesia, 2025). These distinctions matter: describing every local actor simply as an implementer obscures who may investigate, decide, or enforce corrective action. Mapped from the regulation, the formal chain runs from BGN to KPPG to SPPG, with food-safety reporting distributed separately. The documents reviewed here do not show how a frontline communication escalates along that chain or which unit decides on corrective action in practice; this handoff is flagged as unresolved, not assumed to operate.

Table 2. a. Mandate-to-actor map and accountable-response boundaries

Provision	Actor and assigned responsibility	Communication function	Four-element accountability assessment
Arts. 14–16	BGN delivery arrangement; KPPG coordination/oversight; SPPG provision, distribution and nutrition/food-safety information.	Operational instructions and public-facing education.	Authorization: institutional roles identified. Decision, communicated remedy and verification for individual concerns: not established by the inspected material.
Arts. 23–24	Food-supply-chain actors and authorities assigned coordinated risk-based oversight.	Food-safety assurance and oversight communication.	Authorization: safety/oversight responsibilities identified. Case-specific decision, beneficiary explanation and completed correction: not demonstrated.
Art. 25	Reporting actors and specified nearby health services or village/urban-village authorities.	Immediate suspected food-poisoning reporting; separate from routine complaints.	Reporting destination/trigger identified. Receipt alone does not establish authority to decide every remedy, communicate it or verify completion.
Art. 36	Responsible risk-management actors within the governance arrangement.	Risk identification, management and follow-up.	Risk-management mandate identified; complaint-specific decision ownership and closure evidence require further operative guidance/records.
Art. 43(h)	Local government supporting coordination and preparation of stakeholder communication management.	Cross-actor communication support.	Support role identified; it does not by itself transfer substantive decision authority or demonstrate remedy/verification.
Art. 8	Program governance actors responsible for considering the listed indicators.	Monitoring information for review and correction.	Monitoring obligation identified. A documented individual decision, explained remedy and verified correction are not inferred from indicator inclusion.

Source: Republic of Indonesia (2025), provisions discussed in Sections 4.2–4.6. This is a documentary map, not an assessment of compliance or an exhaustive reading of all implementing instruments. "Not established" denotes an evidence boundary, not proof that a procedure or power is absent. The four elements are authorization, documented decision, communicated remedy or explained refusal, and verification.

Published MBG analyses discuss coordination, logistics, infrastructure, and oversight constraints, but their designs and temporal coverage differ. Agustini et al. (2025) report implementation challenges in Bandung (local case); Suprapto et al. (2025) discuss food safety, logistics, and regulatory coherence in early implementation (policy review); and Pora et al. (2025) describe communication, infrastructure, distribution, and digital-access issues (documentary study). The supported findings are these study-specific constraints. The observation that a delivery delay may involve both a supply constraint and late notification is an illustrative scenario, not a finding of any of these studies. Correcting the message can reduce uncertainty but cannot create vehicles, safe kitchens, qualified staff, or funds. The proposed response joins a communication protocol to a decision owner, escalation route, and resource requirement; it does not treat improved publicity as a substitute for operational readiness.

Engagement: feedback channels are necessary but not sufficient

Two-way engagement requires the ability to submit concerns, receive a response, and influence an accountable decision. OECD (2021) distinguishes this function from political promotion. The reviewed documents do not establish which feedback channels actually operate across MBG settings; the only channel-related evidence in the reference set is the description by Pora et al. (2025) of digital-information barriers in remote areas. Combining online communication with school and community channels, and assisted offline reporting, are therefore proposals requiring local testing, not established practice, and the existence and effectiveness of particular local channels need field verification.

Kondolele et al. (2025) studied population and civil-registration services rather than school meals, using a survey of 61 respondents. It is retained as comparative literature because it examines communication components statistically. Its abstract favors communicator credibility and media effectiveness, yet its regression results report the actor-role variable as nonsignificant, the media variable as nonsignificant ($p = .166$), and the message variable as significant ($p = .001$), and its numerical presentation is internally inconsistent. It therefore cannot safely support a blanket claim that each communication component significantly improves implementation, still less a causal claim about MBG.

Structured forums may help actors share local knowledge, but collaboration is not guaranteed by inviting attendance. Convenors need to address unequal speaking power, institutional incentives, and how decisions are recorded and revisited (Ansell & Gash, 2008; Bryson et al., 2015; Emerson et al., 2012). For a program serving children, the framework proposes the following testable design choices: a forum convened by a unit designated by the responsible authority (for example, KPPG or the local-government unit with communication-management support under Article 43(h)); participation of school staff and parents or guardians, with children's input collected through age-appropriate, school-mediated, and confidential channels; documentation of each concern in a shared case register (Table 4); follow-up assigned to the authority legally empowered to act; and protection against disadvantage for raising concerns. These are design safeguards proposed here, not protections shown to operate uniformly across MBG sites.

Transparency, safety, and institutional answerability

The regulation already makes food safety a substantive obligation. Article 23 addresses assurance across the food supply chain; Article 24 assigns coordinated risk-based oversight; and Article 25 requires immediate reporting of suspected food-poisoning incidents to specified nearby health services or village/urban-village authorities (Republic of Indonesia, 2025). A routine complaint queue must not delay this safety-reporting route. Nor should public communication declare a suspected event confirmed or attribute a cause before competent investigation. For public communication the boundaries at each step can be stated: the trigger is a suspected food-poisoning incident; the reporting destination is the specified nearby health service or village/urban-village authority under Article 25; and public communication follows, and does not replace, that report, describing the event as suspected until competent investigation confirms it.

Transparency needs to connect service standards and incident information to explanation and remedy. Fairbanks et al. (2007) and Grimmelikhuijsen and Welch (2012) support attention to organizational conditions and meaningful disclosure; Janssen et al. (2012) identify barriers to assuming that open data automatically yields public value. Proposed MBG disclosures therefore include accessible service expectations, responsible units, non-identifying case status, and verified corrective-action summaries. Identifiable health records and children's details should not be placed on a public dashboard merely to demonstrate openness. Each proposed disclosure is tied to a documented provision: service expectations to the information and education functions in Article 16; responsible units to the delivery arrangement in Articles 14–16; non-identifying case status to the oversight and reporting provisions in Articles 24–25; and corrective-action summaries to the risk-management process in Article 36. Public-facing information is distinguished from restricted safety and child-related records, which are not disclosed.

Food-safety communication should be distinguished from reputation management. The framework proposes, as an untested response protocol, an authorized spokesperson designated by the responsible authority, a time-stamped first notification stating what is known and unknown, protective instructions consistent with health authorities, updates triggered by new verified evidence, and safeguards against attributing a cause before investigation. These measures complement—not replace—inspection, safe food handling, remediation, and appropriate oversight. No national incident count or incidence rate is estimated in this article.

Monitoring: distinguish delivery outputs from program outcomes

Article 8 already requires consideration of indicators including nutritional status, school participation, food vulnerability, dietary-pattern measures, food-poisoning events, and beneficiary numbers (Republic of Indonesia, 2025). It would therefore be inaccurate to state that the formal monitoring framework considers only meals distributed. The unresolved empirical issue is whether sites generate valid data, verify them, and use them for correction. This synthesis has no national dataset that could answer that question. Demonstrating actual monitoring would require site-level administrative records (case registers, incident logs, and beneficiary counts), reporting at site, KPPG, and BGN levels, and independent verification checks; none of these was available to this review.

The reviewed sources reinforce caution about effects. Suprapto et al. (2025) discuss the absence of verified effects on stunting and anemia in early implementation, and the MBG studies in the reference set are local, documentary, or review-based and cannot establish nationwide outcomes. International school-feeding evidence was removed from the final reference set during the reference audit because it consisted mainly of secondary reviews that give context rather than evidence about MBG governance.

Marzulina et al. (2025) frame benefits alongside barriers and policy recommendations. Improved concentration, more meals delivered, and reduced stunting are distinct outcomes with different time horizons and measurement requirements. None can be inferred from social-media activity or a complaint-resolution count alone.

An integrated communication–accountability framework

The proposed framework connects five functions: clarify a service standard; communicate it through actor-appropriate channels; collect and verify frontline and beneficiary feedback; assign a decision and implement corrective action; and explain the response while updating guidance. This is an analytical feedback loop, not a tested causal model. Its distinctive feature is the connection between communication and decision authority: a channel without an accountable response owner may collect reports without changing service delivery. The sequence adapts established accountability concepts rather than contrasting itself with an undefined administrative cycle. Bovens (2007) defines accountability as an actor–forum relationship involving an obligation to explain and justify conduct, questioning and judgement by the forum, and possible consequences. Table 3a compares that definition with the proposed MBG application. A beneficiary-facing channel is not automatically an accountability forum: the authority to question, judge and require consequences must be specified. The framework proposes an operational link, not a replacement for those powers.

Comparison basis: Bovens (2007), published abstract and bibliographic record consulted during revision. The comparison is limited to the definition stated there and does not claim a full-text assessment of that article or validation of the proposed workflow.

Table 3. a. Comparison with the actor–forum accountability model

Element	Bovens (2007): established model	Proposed MBG adaptation and limit
Actor and forum	An actor owes explanation and justification to a forum.	Distinguish report recipient, legally authorized decision owner and reviewing body across SPPG/KPPG/BGN and competent safety authorities. A reporting channel alone is not the forum.
Information and scrutiny	The forum can question the actor and pass judgement.	Retain a case record, reasons and an identifiable review route. These records support scrutiny; the proposal does not confer new legal powers.

Element	Bovens (2007): established model	Proposed MBG adaptation and limit
Consequences	The actor may face consequences.	Record a remedy or explained refusal, escalation and verification. Administrative closure is not equivalent to a sanction, and the proposed indicators do not measure all accountability consequences.
Setting-specific operationalization	A general relational definition, not an MBG delivery protocol.	Add a school-delivery workflow, guidance-version checks, beneficiary explanation and a separate immediate safety-reporting route. These are contextual design choices, not new theoretical elements.

Table 3. Proposed governance mechanisms and boundary conditions

Priority	Proposed mechanism and status	Source basis; why it may help / main limitation
Clarity	Authoritative hub, change log, accessible summaries, comprehension check. Status: authors' proposal derived from implementation theory.	Basis: Edwards (1980); Van Meter & Van Horn (1975); Art. 16 information functions. Reduces avoidable ambiguity; cannot resolve contradictory rules without an authorized decision.
Coordination	Named focal points, responsibility map, escalation and decision log. Status: legal role allocation (Arts. 14–16) plus authors' proposal.	Basis: Republic of Indonesia (2025), Arts. 14–16; Agustini et al. (2025); Pora et al. (2025). Connects reports to action; depends on staffing, authority, and logistics.
Inclusive engagement	School/community forums, assisted offline reporting, age-appropriate feedback. Status: authors' proposal; local testing required.	Basis: Ansell & Gash (2008); Emerson et al. (2012); Bryson et al. (2015); Pora et al. (2025). Broadens participation; requires attention to exclusion, power, confidentiality, and follow-through.
Accountable transparency	Service standards, verified risk updates, non-identifying case summaries. Status: partly grounded in Arts. 24–25 and 36; disclosure format is the authors' proposal.	Basis: Fairbanks et al. (2007); Grimmelikhuijsen & Welch (2012); Janssen et al. (2012). Supports scrutiny; disclosure alone does not ensure investigation or remedy.
Adaptive monitoring	Linked service, communication, safety, and response indicators. Status: indicator consideration is a legal duty (Art. 8); the linkage is the authors' proposal.	Basis: Republic of Indonesia (2025), Art. 8. Makes recurrent issues visible; depends on valid denominators and independent verification.

These mechanisms differ in status. Already required by regulation are the communication support in Article 43(h), the risk-management process in Article 36, the information functions in Articles 11 and 41, and the consideration of indicators in Article 8 (Republic of Indonesia, 2025). Drawn from the literature are attention to meaningful disclosure and to structured collaboration (Fairbanks et al., 2007; Grimmelikhuijsen & Welch, 2012; Ansell & Gash, 2008). The authors' own operational proposals are the version-controlled hub, comprehension checks, decision log, and verified-response indicators. Their value is to make existing requirements operational and testable. Collaborative arrangements can organize joint learning, while responsibility remains with the actor legally empowered to act, which avoids confusing consultation with a transfer of regulatory accountability (Bryson et al., 2015; Emerson et al., 2012).

Policy-design trade-offs and alternative explanations

National standardization can protect minimum nutrition and safety requirements, whereas local adaptation can improve feasibility and acceptability. Article 26 explicitly connects nutrition standards with diversity, balance, safety, and local potential and knowledge (Republic of Indonesia, 2025). The existence of remote-area guidance reinforces the need to examine differentiated arrangements, but its effectiveness cannot be established from a registry entry (Badan Gizi Nasional, 2026). A concrete decision is whether menus or reporting arrangements may be adapted in remote settings. Adaptation should explain equivalent safeguards rather than silently lower them, and the minimum safeguards that cannot be relaxed include immediate safety reporting under Article 25, risk-based oversight under Article 24, and the nutrition-standard requirements of Article 26. No site-level evidence of effectiveness is implied.

The policy also involves trade-offs among coverage expansion, readiness, costs, and reliable supervision. This article does not calculate affordability or cost-effectiveness because it has no validated budget-and-outcome dataset. Instead, it proposes that expansion decisions be accompanied by a readiness assessment covering staff, water and sanitation, distribution, food-safety assurance, and complaint handling. Information quality is one part of readiness. May (2015) and McConnell (2010) help explain why apparent communication success can coexist with operational weakness or contested policy legitimacy. The proposed readiness assessment would assess each domain against site-level evidence (for example, inspection and action registers and case registers); approval of expansion would rest with the authority responsible under the regulation, and an unresolved critical safety risk would defer expansion at that site until corrective action is verified.

Procurement transparency is included because it connects to answerability: a complaint about raw-material quality is actionable only if selection rules and quality requirements can be reviewed by an authorized actor. Article 38 pairs domestic and local-business participation with effectiveness and raw-material quality (Republic of Indonesia, 2025). Local sourcing may be a policy objective, but its nutritional, economic, or integrity benefits cannot be presumed from supplier location alone. The proposed approach makes selection rules, applicable quality requirements, conflicts of interest, and corrective

procedures reviewable, while avoiding unsupported allegations about individual suppliers or institutions.

Alternative explanations remain important. Trust may reflect actual meal quality, prior political attitudes, access to services, or broader institutional reputation. High complaint volumes may indicate poor service, improved reporting access, or both. Low complaint volumes may reflect satisfaction or fear and exclusion. Mettler and Soss (2004) suggest that experience with policy can shape participation itself. Consequently, communication indicators should be interpreted jointly with service audits and beneficiary evidence, not as standalone proof of success. To separate these readings in future work, complaint volume would be paired with service audits and with access measures disaggregated by channel, and trust measures would be compared with meal-quality audit results.

Proposed indicators and implementation priorities

The following indicators are proposed for piloting; no baseline, numerical target, or legally binding response deadline is invented. Responsible institutions would need to define feasible service standards, validate records, and publish the applicable measurement period. Safety-related alerts must follow the immediate reporting obligation in Article 25 rather than a routine administrative response timetable (Republic of Indonesia, 2025). Before piloting, each indicator requires a stated unit of analysis, denominator source, reporting period, responsible verifier, and missing-data rule. Provisional definitions are as follows: an active site is an SPPG-served site delivering meals in the reporting period; an eligible routine case is a non-emergency complaint or query within a published scope; the due date is the date set by the responsible authority's published standard or, where none exists, a locally defined and justified date; reopened cases are counted as open from reopening and reported separately; late reports are recorded with actual timestamps and flagged, not excluded; and missing timestamps are shown. Mandatory safety reporting under Article 25 is tracked separately from routine grievance handling.

Table 4. Proposed indicator definitions

Indicator	Definition / denominator	Data and frequency	Ownership and caution
Current-guidance reach	Sites acknowledging the current guidance / active sites required to receive it × 100.	Versioned distribution and acknowledgment log; after each update.	BGN/KPPG and local focal points; acknowledgment is not comprehension.
Comprehension	Respondents correctly answering agreed operational questions / respondents assessed × 100.	Short, accessible staff/beneficiary checks after material changes.	Delivery and communication teams; samples must be described.
Timely service notification	Changed services notified before the applicable cutoff / changes requiring notification × 100.	Time-stamped schedule/menu-change log; monthly.	SPPG and school focal points; cutoff must be locally defined and justified.
Acknowledged routine complaints	Eligible routine cases acknowledged within the published standard / cases with acknowledgment due in the period × 100.	Case register with receipt and acknowledgment timestamps; monthly.	Designated complaint owner; excludes emergency safety routing.
Verified case resolution	Cases due for resolution closed with verified corrective evidence / cases due for resolution × 100.	Case register, action evidence, and appropriate follow-up; monthly.	Accountable decision owner; disclose reopened and overdue cases separately.
Immediate safety reporting	Report suspected food-poisoning alerts and elapsed time to first notification; show missing timestamps.	Incident logs reconciled with authorized health-service records; per incident.	SPPG/beneficiary representatives and competent authorities; no invented deadline.
Equitable access	Reach, comprehension, and complaint metrics disaggregated by relevant location/channel/access need.	Privacy-preserving site and user checks; periodically.	Local partners and oversight; do not publish identifiable child data.
Corrective-action completion	Actions completed and verified by due date / actions due in period × 100.	Inspection and action register; monthly.	Responsible operational unit plus appropriate verifier; completion is not proof of long-term effect.

A phased sequence is preferable to a dashboard-first approach. First, map existing mandates, channels, and safety escalation routes and identify an accountable focal point. Second, standardize minimal data fields and make offline reporting visible in the same case register. Third, pilot comprehension checks and verified resolution indicators in contrasting settings. Finally, evaluate accessibility, burden, and unintended incentives before expanding. These stages are proposed implementation priorities rather than an official timetable or a finding that no such systems currently exist. The sequence follows from the evidence gap identified above: the documents establish mandates but not operating channels, so mapping precedes measurement. Pilot sites would be selected to contrast delivery settings (for example, differing remoteness and digital access); success checks would be record completeness and verifiability, acceptable reporting burden, and the absence of unintended incentives; and indicators would be revised if their definitions prove unworkable.

Limitations and research agenda

The purposive design, the reference audit that reduced an earlier set, and uneven source access limit comprehensiveness and reproducibility. Several MBG publications are themselves reviews, may cite overlapping material, and cannot be counted as independent confirmation of the same claim. No formal study-quality assessment, duplicate screening, or duplicate extraction was conducted. Bibliographic verification establishes source identity and metadata, not the validity of every result. The source-to-claim matrix makes these limitations visible rather than implying a systematic evidentiary base. Unequal source access may also bias the five-theme framework: themes that rest on full legal text, such as safety reporting and monitoring, are better evidenced than those that rest on abstract-level records, so the framework may overstate the weight of the latter. The conclusions most sensitive to abstract-level access and overlapping reviews are the reported implementation constraints in Section 4.3; if those sources were excluded, the

legal-mandate findings would stand, but the constraints would rest on theoretical inference rather than reported observation.

The school-focused literature also limits conclusions about pregnant women, breastfeeding mothers, younger children, and other beneficiary categories. Digital-access barriers, power differences, and fear of reporting are plausible concerns, but their magnitude requires direct investigation. The proposed framework has not been validated against national administrative data. It should not be used to rank regions without harmonized definitions, a defensible denominator, and attention to differing readiness and reporting access. The channels and indicators in Tables 3 and 4 (school and community forums, school focal points, and comprehension checks with staff and school-based beneficiaries) are proposed for school delivery. For pregnant women, breastfeeding mothers, and children aged six months to under five years, channels and indicators would need to be redesigned and tested separately.

A first empirical test would examine two hypotheses: sites with versioned, acknowledged guidance show more consistent implementation than comparable sites without it, and sites where a named decision owner closes cases with verified corrective evidence show fewer reopened cases. Contrasting localities would be selected by remoteness and digital access; outcomes would be guidance reach, comprehension, and verified resolution; and resource availability, geography, and baseline service quality would be controlled through site matching or statistical adjustment. Later studies could add document-version histories, observation of delivery processes, interviews with implementers and beneficiaries, and independently checked case records. Nutrition and educational effects require separate outcome measures, appropriate follow-up, and comparison strategies, and a longitudinal mixed-method evaluation would better distinguish communication mechanisms from operational capacity and wider policy feedback (Mettler & Soss, 2004).

Conclusion

The most defensible documentary insight is that MBG's public-communication challenge is not simply a shortage of publicity. Existing governance provisions already connect nutrition education, risk communication, local communication management, and monitoring to implementation responsibilities, so the open question is operationalization. The reviewed documents establish these obligations but not how they operate in practice or whether concerns lead to verified corrective action. The principal proposal, which answers the research question, is to link each information channel to verification, a decision owner, corrective action, and an explanation of the response.

The article offers a context-specific organization of established communication and accountability concepts within a selected corpus, rather than a new accountability theory or a nationwide performance verdict. The unresolved connection is demonstrated only for the material accessed in this corpus; its absence from the wider MBG literature has not been established. Regulations establish requirements; local studies illuminate risks and possible mechanisms; the response loop and indicators are the authors' provisional proposals and specify questions for empirical testing. Communication may support more consistent and responsive delivery when resources, authority, safety controls, and oversight are in place, but it cannot substitute for them. Claims about improved nutrition, school participation, or public trust require evidence beyond this document-based analysis.

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Declarations

Generative artificial intelligence: Generative AI assisted with critical review, restructuring, language editing, and preparation of the revised manuscript and reference presentation. The authors are responsible for checking all source interpretations, references, declarations, originality, and the final manuscript, and for complying with the target journal's disclosure policy.

Ethics and informed consent: This study analyses publicly available documents and published literature; no primary human-participant data collection is reported, and no ethics approval or exemption number is claimed. The institutional determination is pending confirmation by the authors.

Data availability

Sources are identified in the references, and the bounded source-to-claim synthesis is presented in Table 2, the mandate map in Table 2a and the retrospective worked example in Section 3.3. Appendix A provides a source-access inventory, including undocumented access levels. No separate extraction file or participant-level dataset was created or is available. Access to original publications remains subject to their publishers' terms.

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