



A Phased Evaluation of the Free Nutritional Meal Program in Indonesia: A Qualitative Comparative Study with Brazil and India

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ABSTRACT

The literature on school meal programs is rich in assessing educational and nutritional outcomes, yet limited in providing a realistic evaluation framework for programs still in their early implementation phase. This article develops a phased evaluation framework for the Free Nutritional Meals Program (MBG) in Indonesia through a qualitative comparative study based on document analysis of MBG, PNAE in Brazil, and PM POSHAN in India. A structured focused comparison method was used to examine the legal basis, division of authority, implementation standards, social control mechanisms, and program linkages to the local economy. The analysis yields four main findings: program performance is shaped by legal institutionalization and clarity of mandates; operational standards determine service stability in the early phase; institutionalized social control strengthens accountability; and linking the program to local procurement expands its public value. Based on these findings, this article proposes an MBG evaluation framework with three time horizons: 0–2 years for implementation effectiveness; 3–5 years for educational, nutritional, and local economic outcomes; and 5–10+ years for human resource development impact and policy sustainability. The novelty of this article lies in the development of a time-horizon-based evaluation matrix that is operationalizable for monitoring and subsequent research.

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INTRODUCTION

School meal programs have evolved from a social assistance instrument into a cross-sectoral policy linking education, nutrition, social protection, and food systems. The State of School Feeding Worldwide 2024 indicates that at least 466 million children across countries and jurisdictions receive school meals. This significant coverage indicates that school meal programs are now public policy infrastructure, not merely emergency interventions or residual aid (World Food Programme, 2024). From a public administration perspective, such programs need to be understood as policies whose success is determined by institutional design, implementation capacity, and the quality of policy evaluation.

In Indonesia, the Free Nutritional Meal Program (MBG) began its phased implementation on January 6, 2025, through the Nutrition Fulfillment Service Unit (SPPG). Official documents from the National Nutrition Agency (BGN) in 2025 indicate that the program was rapidly expanded and positioned as a large-scale national public service intervention. This acceleration made the MBG one of the most ambitious public service policies in the early stages of the administration, but also increased the risk of problems with coordination, quality standards, targeting accuracy, and accountability in implementation (National Nutrition Agency, 2025, 2025, 2025).

The main problem with MBG evaluation lies in the tendency to prematurely assess success through administrative outputs, such as the number of beneficiaries, the number of service points, or the volume of distribution. While these metrics are important for assessing initial implementation performance, they are insufficient to assess the success of MBG as public policy. Within a policy evaluation framework, a clear distinction must be made between outputs, outcomes, and impacts. Without this distinction, distribution statistics are easily interpreted as evidence of substantive success, when in fact, the program's effectiveness, impact, and sustainability require a different perspective (OECD, 2021).

The literature on school meal programs suggests that these interventions are potentially associated with school attendance, certain learning outcomes, nutritional indicators, and household social resilience. However, the same literature also emphasizes that program outcomes are highly dependent on implementation design and governance context (Bundy et al., 2009; Kristjansson et al., 2007; Raveenthiranathan et al., 2024). Furthermore, the public administration literature emphasizes that clarity of objectives, implementation structures, resources, political support, and coordination between actors are essential prerequisites for successful policy implementation (Mazmanian & Sabatier, 1983; Hill & Hupe, 2002).

In the Indonesian context, the empirical basis for school meal programs is not entirely empty, but it remains fragmented. Sekiyama et al. (2018) show that the history of school meal programs in Indonesia has been sporadic and has not yet established a stable national evaluation framework. A mixed-methods evaluation of the School Child Nutrition Program (ProGAS) also found that school meal interventions can improve consumption diversity, hygiene practices, and the learning environment, but do not automatically result in changes in nutritional status within a short timeframe (Pramesthi et al., 2025). These findings are important because they suggest that behavioral outcomes and implementation quality tend to emerge more quickly than more distant biological impacts. At the same time, Nurmansyah and Fitriani (2025) emphasize that early-phase MBG evaluations require an implementation research lens, not simply a substantive assessment of effectiveness.

In the Indonesian context, discussions on the MBG program are still dominated by two tendencies. First, normative discussions regarding the program's urgency for human resource development. Second, reviews of early implementation highlighting operational and coordination challenges. Such studies are important, but they fail to fully address more fundamental evaluative needs: what indicators are realistic for assessing the MBG program in the initial, mid-term, and long-term phases, and how lessons learned from other countries can be translated into an operational evaluation framework for Indonesia. In other words, the gap in the literature lies not in the absence of discussion of school feeding, but rather in the lack of analytical tools that explicitly distinguish what should be assessed in the initial implementation phase, intermediate outcomes, and long-term impacts.

Based on this gap, this article does not aim to prove the impact of the MBG in Indonesia. Its goal is more limited but more fundamental: to develop a time-based, phased evaluation framework through a comparative study of Brazil and India. The article's novelty lies in three aspects. First, it shifts the focus from program advocacy to policy evaluation design. Second, it compares the MBG with two established programs using the same comparative dimensions, so that the resulting lessons are not limited to case descriptions. Third, it produces an evaluation matrix and an example of an operational dashboard that can be used as a bridge between administrative monitoring, outcome evaluation, and further research design. Therefore, this article differs from a typical policy review: its contribution goes beyond simply summarizing other countries' practices to translating lessons learned into operational evaluative tools.

Based on this background, this article answers three questions. First, how does the institutional design and governance of the MBG compare with school meal programs in Brazil and India? Second, how should the outcome horizon of the school meal program be differentiated between the short-, medium-, and long-term? Third, what evaluation indicators are most relevant for assessing the MBG without conflating implementation output with long-term impacts? By answering these questions, this article seeks to develop a more proportionate evaluation framework for the MBG as a cross-sectoral public policy.

METHODS

This research is a qualitative comparative study based on document analysis and a synthesis of policy literature. The structured focused comparison method was chosen because it allows for comparison of multiple cases through the same set of analytical questions, while maintaining sensitivity to the institutional context of each case (George & Bennett, 2005). In this article, the comparison protocol asks the same five questions in each case: how program objectives are formulated, how authority is allocated, how quality and safety standards are operationalized, how social control is institutionalized, and at what time horizon program outcomes become feasible to assess.

The cases were selected purposively. Indonesia is the primary case because the MBG is still in its early stages of institutionalization. Brazil was chosen because the PNAE is known for its strong legal basis, procurement from family farms, and institutionalized social control mechanisms. India was chosen because PM POSHAN, a continuation of the Mid-Day Meal Scheme, offers a large national scale, detailed operational guidelines, and a longer trail of outcome evidence. These three cases were treated as comparable cases for lesson-drawing, not because they are identical to each other, but because they are all national programs in large and diverse countries, implemented through a combination of central standard-setting and subnational implementation, and link nutrition goals to education and social protection.

The unit of analysis in this article is the national-level school meal program as a policy governance structure. To operationalize this unit of analysis, the comparison focuses on five dimensions: (1) legal basis and formulation of objectives; (2) division of authority and implementing structure; (3) operational standards, quality, and security of services; (4) social control mechanisms; and (5) the program's linkages to local educational, nutritional, and economic outcomes.

The primary corpus analyzed directly consisted of core policy documents for each case and relevant supporting scientific articles. For Indonesia, the core documents included the BGN's official release and website from the early 2025 rollout phase. For Brazil, the core corpus

included Lei no. 11.947/2009 and the FNDE's official website on PNAE, agricultura familiar, and CAE. For India, the core corpus included the 2021 PM POSHAN guidelines, the program's official website, and the 2024 Press Information Bureau release on quality, safety, and hygiene. The corpus was supplemented by OECD and WFP documents and peer-reviewed articles that explicitly addressed school feeding outcomes, the history of the school feeding program in Indonesia, the ProGAS evaluation, and issues related to MBG implementation.

Sources were selected purposively using four criteria. First, they must be directly relevant to the five dimensions of analysis. Second, they must come from authoritative institutions or searchable scholarly publications. Third, for official documents, only those that are current, still referenced, or represent the implementation phase being analyzed were included. Fourth, for empirical articles, sources were selected if they explicitly examine the outcomes of the school meal program or the governance of its implementation. Opinion pieces, media commentaries, and sources that do not explain the basis for the findings were not used as the primary inference base. Within these boundaries, the primary corpus is not identical to the entire bibliography: theoretical literature serves as an analytical lens, while core documents and empirical articles serve as a basis for comparison.

Document analysis was conducted through a manual coding process based on a comparative matrix. In the first stage, each document was read repeatedly to extract information about the program objectives, implementing actors, regulatory instruments, quality standards, oversight mechanisms, and types of reported results. In the second stage, the findings were coded into five comparative dimensions: (1) legal basis and formulation of objectives; (2) division of authority and implementing structure; (3) operational standards, quality, and security of services; (4) social control mechanisms; and (5) program linkages to education, nutrition, and local economic outcomes. In the third stage, a cross-case comparison was conducted using the same set of questions for all three cases. In the fourth stage, the comparison results were translated into an evaluation horizon and indicator matrix for the MBG.

To ensure the robustness of the inferences, official documents are always cross-referenced with relevant scientific articles or independent reports on the same issues. The resulting comparative inferences are lesson-drawing, not claims of mechanical policy transfer. This article does not claim that the MBG will produce the same outcomes as the PNAE or PM POSHAN; what is drawn from the comparisons are lessons regarding the governance conditions, types of indicators, and sequence of evaluative questions that are more realistic for the MBG.

RESULTS AND DISCUSSION

The comparison reveals that the three cases share one fundamental similarity: the school meal program is a complex administrative policy. It combines menu development, procurement, distribution, quality control, public financing, and relationships with schools and communities. Therefore, the program's success cannot be explained solely by budget size or expanded coverage. More crucial is whether the governance architecture is capable of ensuring orderly, safe, and accountable service delivery. The following findings are built upon a cross-section of official documents and scholarly articles; therefore, this section first presents evidence-supported cross-case patterns and then draws evaluative implications for MBG.

However, the three cases are at different degrees of institutionalization. This difference is analytically important. MBG is in the phase of institution building and service expansion. PNAE represents a program that is already firmly institutionalized in law and governance. PM

POSHAN shows how a large-scale program with a longer implementation track record is beginning to generate a more meaningful basis for outcome evaluation. Therefore, this comparison is not intended to rank the three cases. However, the three cases are at different degrees of institutionalization. This difference is analytically important. MBG is in the phase of institution building and service expansion. The PNAE represents a program that has been firmly institutionalized in law and governance. PM POSHAN demonstrates how large-scale programs with a longer implementation track record are beginning to generate a more meaningful basis for evaluating outcomes. Therefore, this comparison is not intended to rank performance across countries, but rather to position MBG proportionally within the policy cycle.

Governance Architecture and Evaluative Implications

Table 1. Main governance architectures and evaluative implications

Case	Program position in the policy cycle	Prominent governance features	Evaluative implications
MBG (Indonesia)	Initial phase of institutional formation and service expansion	BGN and SPPG as the backbone of implementation; data is still predominantly administrative; cross-sector coordination is being organized	Initial evaluation should focus on process effectiveness, food safety, coordination, standards compliance, and complaint resolution.
PNAE (Brazil)	Mature institutionalization	Strong legal basis; subnational implementation; procurement from family farms; CAE as formal social control	Evaluations need to assess legal design, social control, and local procurement as part of program performance.
PM POSHAN (India)	Well-established national scheme with a long track record of implementation	Central-state co-financing; quality and hygiene guidelines; community participation; long implementation experience	Outcomes are more appropriate to assess when operational standards are stable and medium-term data are available.

Note: PM POSHAN is the new name of the scheme which succeeds the Mid-Day Meal Scheme.

The MBG in Indonesia is currently best understood as a policy that is building organizational capacity. At this stage, the most relevant assessment is not claims of significant impact, but rather whether the country is able to stabilize services, enforce food safety, maintain menu compliance, clarify coordination flows, and address operational issues quickly. This reading is consistent with Indonesia's existing knowledge base: the history of previous school meal programs tends to be fragmented (Sekiyama et al., 2018), while evaluations of ProGAS indicate that improvements in dietary diversity, hygiene, and learning environments can emerge more rapidly than changes in nutritional status (Pramesthi et al., 2025). Studies of the early implementation of the MBG itself also confirm that the program's potential for human resource development is significant, but evidence of substantive outcomes is still very preliminary and insufficiently established to be interpreted as impact (Nurmansyah & Fitriani, 2025; Suprpto et al., 2025).

Brazil exhibits a more mature form of institutionalization. PNAE not only provides food but is normatively framed as an instrument supporting development, learning, and the formation of healthy eating habits. With a strong legal basis, this program exemplifies how school meal programs can be positioned as a policy right integrated with education and food security. From a public administration perspective, what stands out in Brazil is not only the program's age, but also the institutionalization of the relationship between program objectives, the division of authority, food procurement, and social control (Fundo Nacional de Desenvolvimento da Educacao, 2026a; Presidencia da Republica do Brasil, 2009).

Brazil's lessons become even more important when viewed in light of two features of its governance. First, procurement from family farms makes the PNAE not merely a public consumption policy but also an instrument for strengthening the local economy. Second, the existence of the Conselho de Alimentacao Escolar (CAE) makes social control a formal part of the program's architecture. Oversight of food quality, hygiene, distribution, and financial accountability relies not solely on internal bureaucracy but also on institutionalized participatory mechanisms. This combination demonstrates that the public value of school meal programs increases when their legal design effectively links student service delivery with procurement governance and social accountability (Fundo Nacional de Desenvolvimento da Educacao, 2026b, 2026c; Sidaner et al., 2013).

India, through PM POSHAN, offers a different lesson. On the one hand, the Indian case demonstrates the importance of a national scheme with relatively detailed implementation standards and a clear division of funding between the central and state governments. On the other hand, India also provides a longer empirical track record of the program's relationship to educational outcomes and several nutritional indicators. Guidelines on food quality, safety, and hygiene demonstrate that the success of large-scale programs depends heavily on day-to-day operational discipline, not just policy intent (Government of India, 2021; PM POSHAN, n.d.; Press Information Bureau, 2024).

What is particularly relevant from India is that program outcomes only become more meaningful when services have been in place for a long time and are relatively stable. Several studies have shown positive associations between longer program exposure and reading and math outcomes, and suggest potential intergenerational benefits under certain conditions. However, this evidence cannot be readily transferred to Indonesia. This is precisely where the evaluative lesson emerges: education and nutrition outcomes require adequate program exposure, relatively consistent implementation quality, and a more robust measurement design than simply distributional statistics (Chakraborty & Jayaraman, 2019; Chakrabarti et al., 2021; Raveenthiranathan et al., 2024).

Four comparative findings and evaluative implications for MBG

First, the Brazilian and Indian documents demonstrate that legal institutionalization and clarity of mandates make evaluation objectives more defined. In Brazil, the PNAE objectives are explicitly formulated in a legal framework that links dietary intake to development, learning, and healthy eating habits. India also demonstrates the importance of a clear program architecture through national guidelines and defined funding allocations. Indonesia is still in the phase of strengthening the division of labor between institutions and standardizing implementation. Therefore, in the context of the MBG, short-term indicators need to first capture design coherence, clarity of responsibilities, and the adequacy of regulatory instruments before moving on to more distant outcome claims.

Second, the 2021 India document and the 2024 Press Information Bureau release, as well as the multi-layered oversight mechanisms within the PNAE, indicate that operational standards and quality assurance are prerequisites for the program, not additional technical issues. In the Indian case, quality, safety, and hygiene are treated as explicitly regulated components. In the Brazilian case, service quality is reinforced through administrative and social oversight. These findings guided the MBG's initial evaluation of indicators such as menu compliance, food safety incidents, distribution delays, supply chain reliability, and speed of problem resolution.

Third, Brazil exhibits the most robust form of institutionalized social control through CAE, while India exhibits varying levels of community participation in oversight and implementation. These comparative findings are important because they demonstrate that effective oversight of school meal programs does not rely solely on internal bureaucracy. In the MBG context, complaint channels, data transparency dashboards, regional oversight committees, and school and parent engagement are part of the governance evaluation process, not merely complementary tools.

Fourth, the FNDE document and the PNAE study demonstrate that linkages to the local economy are an explicitly stated component of program design, not an incidental side effect. India also demonstrates the potential for local food use and community participation in implementation. For MBG, this experience confirms that evaluations should not simply assess how much food is distributed, but also how procurement patterns impact local farmers, cooperatives, and MSMEs. Thus, local procurement deserves to be treated as a measurable dimension of program performance.

Overall, the similarities between the cases lie in the need for cross-government coordination and oversight of service quality. The differences lie in the governance emphasis: Brazil excels in legal institutionalization, local procurement, and social control; India excels in operational discipline and a longer outcome track record; and Indonesia is still in the process of building the system's foundations. Therefore, the most important lesson for MBG is not to blindly copy specific instruments, but rather to align evaluation priorities with the program's maturity level.

Implications of Public Administration

Rather than being seen as a mere policy of handouts, these comparative findings demonstrate that the MBG is a test of the state's capacity to manage cross-sectoral policies. The public administration implications are at least threefold. First, the quality of central-regional relations and the division of labor between institutions will affect service reliability. Second, MBG accountability needs to shift from administrative reporting to participatory oversight and data transparency. Third, procurement logic must be assessed not only on procedural compliance but also on its contribution to public value, including the local economy and citizen trust. Thus, MBG evaluation should not be treated simply as a program audit, but as a governance learning instrument.

Justification of the Evaluation Horizon and Proposal Matrix

The division of time horizons into 0-2 years, 3-5 years, and 5-10+ years in this article is not a fixed number, but a reasonable analytical range. The 0-2 year period represents the phase of establishing administrative routines. At this stage, program issues generally emerge as delivery issues: targeting accuracy, service continuity, food safety, standards compliance, and complaint handling. Therefore, the evaluation should focus on process effectiveness, operational efficiency, and institutional coherence.

The 3-5 year timeframe was chosen because during this period, implementation is expected to become more stable, cross-sector data integration is possible, and the program's exposure to beneficiary groups is sufficiently long to allow for a more user-friendly understanding of outcomes. At this stage, indicators such as school attendance, learning concentration, school and student satisfaction, selected nutrition indicators, and local supplier engagement become more feasible to evaluate. These outcomes should still be interpreted with caution, but they are methodologically sound compared to prematurely claiming long-term impacts.

A 5-10+ year time horizon is necessary because learning outcomes, healthy eating habits, human resource development, and policy sustainability are cumulative. Such effects cannot be accurately inferred from annual rollout data alone. They require longer exposure cohorts, longitudinal data, and a more robust evaluation design. Thus, the time horizon proposed in this article simultaneously attempts to prevent two common pitfalls: assessing impact too early and reducing evaluation to mere output reporting.

Table 2. Time horizon-based MBG evaluation matrix

Horizon	Rational horizon	Dominant evaluation criteria	Core indicators	Suggested methods and data sources
0-2 years	The phase of establishing service routines and institutional arrangements	Relevance, coherence, initial effectiveness, process efficiency	Service coverage; targeting accuracy; distribution continuity; menu compliance; food safety; complaint resolution; budget absorption; supply chain stability	Administrative dashboard; compliance audit; field inspection; food safety audit; process review
3-5 years	Implementation is starting to become more stable and cross-sector data integration is starting to become possible.	Program effectiveness, cross-sector coherence, selected outcomes	School attendance; learning concentration proxy; recipient satisfaction; selected nutrition indicators; portion and value of local procurement	Mixed methods; user survey; comparative analysis across regions; integration of school, health, and procurement data
5-10+ years	Longer cohort exposure and cumulative effects are more likely to be observed.	Impact and sustainability	Learning outcomes; healthy eating habits; human resource development proxy; regional economic impact; fiscal-political sustainability	Longitudinal study; quasi-experiment; cohort study; fiscal analysis and policy sustainability

The matrix emphasizes that indicators are selected based on two considerations. First, indicators must be administratively relevant, meaning they fall within the reasonable control or influence of implementing actors over a specific time horizon. Second, indicators must be evaluatively relevant, meaning they can answer distinct substantive questions about program quality, not simply add to a list of reporting statistics. Therefore, the table above is not a list of

general recommendations, but rather an operational translation of comparative findings and a policy evaluation framework.

Proposed MBG Policy Evaluation Agenda

Unlike the analytical-descriptive results section above, this subsection is explicitly normative-applied: it translates comparative findings into an implementable and testable evaluation agenda. For the evaluation matrix to remain a conceptual tool, it needs to be translated into a data architecture and institutional role allocation.

The division of evaluation roles also needs to be more clearly defined. The National Agency for National Development Planning (BGN) should take the lead in collecting data on services, quality, food safety, and complaint resolution. Schools and education offices should better consolidate available attendance and learning indicator data. Health offices can support the measurement of selected nutrition indicators. Local governments and procurement units should play a role in monitoring the involvement of local farmers, cooperatives, or MSMEs. With this division, MBG evaluation will no longer rely on a single institution but instead operate as a cross-sectoral data system more consistent with the nature of the program.

Table 3. MBG Operational Evaluation Table

Dimensions	Core operational indicators	Frequency	Main person in charge	Evaluative function
Service	Number of active SPPGs; distribution continuity; delay ratio	Weekly/monthly	BGN and SPPG implementers	Monitoring service reliability
Quality and safety	Menu compliance; hygiene inspection results; food safety incidents	Weekly/monthly	BGN, health department, school	Service quality early warning system
Accountability	Number of complaints; resolution rate; response time; data transparency	Monthly	BGN, local government, complaint unit	Strengthening social control and rapid correction
Local economy	Portion of spending from local farmers/cooperatives/MSMEs; local contract value	Quarterly	BGN, local government, procurement unit	Assessing the program's relevance to the regional economy
Education and nutrition	Student attendance; teacher perception of learning concentration; selected nutritional indicators	Semester	Schools, education departments, health departments	Read the medium term outcomes
Sustainability	Budget realization; cost per portion; regulatory support; funding stability	Semesterly/annually	BGN, Ministry of Finance, fostering ministry	Assessing policy sustainability

In the initial phase, these indicators are more realistically used as a managerial dashboard rather than directly treated as evidence of impact. Once data becomes more consistent and implementation coverage more stable, the evaluation can move to a comparative design across regions or across implementation intensities. In other words, the MBG evaluation agenda needs

to be understood as a hierarchical process: from administrative monitoring to outcome evaluation, and then to impact evaluation. Without such a sequence, evaluations can easily fall into two categories: managerial inadequacy and methodological weakness.

Research Limitations

This article has several limitations. First, the research is based on document analysis and literature synthesis, thus not directly capturing the dynamics of daily implementation in the field. Second, the degrees of maturity of the programs being compared differ significantly; therefore, the comparison is intended to draw policy lessons, not to equate success rates between countries. Third, the coding process was conducted by a single author and did not involve formal intercoder reliability testing, although category consistency was maintained through repeated readings and cross-comparison between documents. Fourth, the article focuses on public administration governance, so technical aspects of nutrition and health are not discussed in depth. Fifth, the literature was selected purposively, rather than through a systematic review. Therefore, this article's contribution lies in sharpening the analytical framework, not in claiming completeness of the entire existing literature. These limitations also open up opportunities for further research that incorporates field observations, stakeholder surveys, and a more robust quantitative evaluation design.

CONCLUSION

This comparative study demonstrates that MBG evaluation should follow the program's maturity level. In the initial phase, the most valid measures of success are service stability, quality standards, food safety, clarity of authority, and operational accountability. Lessons from Brazil and India indicate that outcomes in education, nutrition, and the local economy are more meaningfully assessed when implementing institutions are relatively stable, implementation standards are more consistent, and oversight mechanisms are in place.

The scholarly contribution of this article lies not in claiming that the MBG has been effective, but rather in formulating an evaluation tool that links the program's institutional maturity to the choice of indicators, data sources, and evaluation methods. By positioning evaluation as a public administration issue, this article demonstrates that the success of the MBG should not be reduced to distribution volume, but also should not be judged prematurely through claims of long-term impact that have not yet been adequately tested. The distinction between time horizons of 0-2 years, 3-5 years, and 5-10+ years allows for a more realistic assessment of what can and cannot be concluded from the program.

The policy implications are that the government needs to strengthen regulations, quality standardization, social control, cross-sectoral data integration, and local procurement indicators as part of the MBG evaluation system. However, because this article is based on document analysis and literature synthesis, empirical testing of the proposed framework still requires field studies, stakeholder surveys, and a more robust quantitative evaluation design in Indonesia. Therefore, this article does not close the debate on MBG, but rather provides a more proportionate evaluative framework for assessing the program as a cross-sectoral public policy.

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