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Implementation of the Free Nutritious Meal Program (MBG): A Study of Governance and Inter-Agency Coordination at the Regional Level

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Abstract

The Free Nutritious Meal Program (*Makan Bergizi Gratis*, MBG) is a national strategic program that, in less than two years, expanded from 190 Nutrition Fulfillment Service Units (SPPG) to tens of thousands of units serving more than 60 million beneficiaries. This acceleration has not been matched by governance readiness at the regional level, as reflected in suspected food poisoning cases, low coverage of hygiene and sanitation certification, and repeated budget adjustments. This study analyzes the governance architecture of MBG and the dynamics of inter-agency coordination at the regional level following Presidential Regulation Number 115 of 2025. It employs a descriptive-analytical qualitative approach based on policy document analysis, official program performance data, and a literature review, with North Sumatra Province as a contextual illustration. The analytical framework combines Edwards III's implementation model, public sector coordination theory, and collaborative governance. The findings show that MBG operates through a vertical chain of command of the National Nutrition Agency that runs parallel to regional government structures, while the role of regional governments is framed as support without clear control authority. Consequently, coordination tends to be reactive, relies on circular letters and ad hoc task forces, and remains weak in data integration, food safety supervision, and the use of local supply chains. This study proposes a Risk-Based Layered Coordination Model consisting of a clarified regional mandate, institutionalized task forces, an integrated data system, risk-based food supervision, and fiscal and local economic accountability. The model repositions regional governments from mere supporters into accountable co-implementers.

Keywords: *free nutritious meals, governance, inter-agency coordination, regional government, development administration*

INTRODUCTION

Development administration regards the state bureaucracy as the driver of planned social change. Within this framework, government does not merely regulate; it also designs, mobilizes, and controls programs intended to improve people's quality of life (Tjokroamidjojo, 1995). Siagian (2008) emphasizes that development outcomes are largely determined by the capacity of public administration to coordinate agencies with different interests, authorities, and resources. Human capital development, particularly child nutrition, is the field that demands this coordinating capacity most, because its results depend on the simultaneous work of the education, health, food, and regional government sectors.

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International experience shows that school feeding programs can serve at once as a social safety net, an educational instrument, and a driver of the local economy (Bundy et al., 2009; World Food Programme, 2022). Brazil, for example, developed its school feeding program gradually by integrating procurement from family farming, nutritional oversight, and the participation of school food councils at the local level (Sidaner et al., 2013). The key lesson is that the success of school feeding is determined not only by the size of the budget but also by a clear division of roles between central and regional governments.

Indonesia launched the Free Nutritious Meal Program (*Makan Bergizi Gratis*, MBG) on 6 January 2025 through the National Nutrition Agency (*Badan Gizi Nasional*, BGN), which was established by Presidential Regulation Number 83 of 2024. The program began with 190 Nutrition Fulfillment Service Units (*Satuan Pelayanan Pemenuhan Gizi*, SPPG) serving approximately 570,000 beneficiaries and grew to 19,188 SPPG serving 55.1 million beneficiaries by the end of 2025 (Metro TV News, 2026). BGN performance data as of 1 June 2026 recorded 62.96 million beneficiaries, 378,585 recipient schools, and around 1.3 million workers employed, against a national target of 82.9 million beneficiaries (Kompas TV, 2026). This scale and speed make MBG one of the fastest-expanding public feeding programs.

This rapid expansion has taken place within a constantly shifting fiscal framework. The MBG allocation in the 2026 State Budget was initially set at IDR 335 trillion and later adjusted to IDR 268 trillion (Bisnis.com, 2026a). The government subsequently lowered the ceiling to around IDR 240 trillion and signaled that actual spending could fall below IDR 200 trillion through efficiency measures (DDTCNews, 2026). Meanwhile, the Constitutional Court, through Decision Number 40/PUU-XXIV/2026, required the MBG budget to be separated from the education budget no later than the 2028 State Budget. These layered changes indicate that the governance and financing design of MBG is still taking shape.

Implementation problems have also emerged in the field. BGN data as of 1 June 2026 recorded 29,028 children receiving outpatient care and 2,413 children hospitalized due to suspected food poisoning, while 995 SPPG had their operations suspended, 367 received a first warning letter, and 16 received a second warning letter (Kompas TV, 2026). In March 2026, only 8,700 of the 24,443 operating SPPG held a Hygiene and Sanitation Eligibility Certificate (*Sertifikat Laik Higiene Sanitasi*, SLHS) (Kontan, 2026). The handling of poisoning victims has also imposed unexpected costs on regional governments, particularly for regional hospital services (Bisnis.com, 2025).

The government responded by issuing Presidential Regulation Number 115 of 2025 on the Governance of the Free Nutritious Meal Program on 17 November 2025. The regulation affirms that MBG acceleration is pursued through multisectoral cooperation at the central, regional, and village levels and specifies the support that regional governments must provide. The Ministry of Home Affairs also issued a series of circular letters, ranging from support for land provision for SPPG to the inspection and conformity assessment of SPPG in the regions. Nevertheless, by the end of October 2026 the central government still had to warn regions that had not yet established MBG task forces (Katadata, 2026b). This suggests that the coordination problem has not been resolved simply by issuing regulations.

Previous studies have examined MBG from various angles. Malik et al. (2025) and Fitriani and Maulidya (2026) applied the Edwards III model and identified problems of communication, disposition, and coordination among implementers at the school and regional levels. Nugroho et al. (2025) and Sangaji et al. (2026) demonstrated the importance of collaborative governance among schools, SPPG, community health centers, and relevant agencies. Erlyn et al. (2026) found weak risk-based monitoring and cross-sector coordination in food safety assurance, while Jumantoro and Fahamsyah (2026) highlighted the legal liability of program organizers in mass poisoning incidents. Hadinata (2026) analyzed the policy, fiscal, and political dimensions of MBG, and Hadi and Ismail (2026) reviewed its effectiveness and

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efficiency. Pora et al. (2025) also mapped the solutions and challenges of MBG implementation in its first year. These studies provide an important foundation, but most focus on a single school, a single district, or a single technical aspect, and few have analyzed the institutional architecture of MBG after Presidential Regulation 115/2025 from the perspective of coordination across levels of government.

The novelty of this study lies in reading MBG as a multilevel governance problem, namely the encounter between a vertical agency operating through a functional chain of command and regional governments operating under the logic of territorial autonomy. The study does not merely map implementation barriers but also formulates an operational coordination model for regional governments. Accordingly, this study addresses three research questions:

1. What is the governance architecture of the MBG Program, and what is the position of regional governments following Presidential Regulation Number 115 of 2025?
2. How does inter-agency coordination unfold in the implementation of MBG at the regional level, and what factors shape it?
3. What coordination-strengthening model is relevant for the delivery of MBG at the regional level?

This study aims to analyze the position of regional governments within the MBG governance architecture, identify weak points in inter-agency coordination at the regional level, and formulate a coordination-strengthening model that can be used by regional governments, BGN, and relevant ministries. The findings are expected to contribute theoretically to development administration studies and practically to improving the delivery of MBG, especially ahead of the change in its financing scheme in 2028.

METHOD

This study uses a qualitative approach with a descriptive-analytical design in the form of a policy study. This approach was chosen because the core problem lies in how rules, institutions, and coordination practices shape implementation outcomes rather than in measuring nutritional impact. The data are secondary and fall into three groups. The first group consists of regulatory and policy documents, namely Presidential Regulation Number 83 of 2024, Presidential Regulation Number 115 of 2025, circular letters of the Minister of Home Affairs on MBG, and Constitutional Court Decision Number 40/PUU-XXIV/2026. The second group consists of program performance data published by BGN, the Ministry of Finance, and the Coordinating Ministry for Food Affairs between January 2025 and October 2026. The third group consists of previous studies published between 2024 and 2026.

The data were analyzed using document analysis, a systematic procedure for reviewing and interpreting documents to elicit meaning and develop empirical understanding (Bowen, 2009). The analysis followed the stages of data condensation, data display, and conclusion drawing and verification (Miles et al., 2014). Data credibility was maintained through source triangulation by comparing data from regulations, official government releases, mainstream media reports, and research findings. Figures that differ across sources are reported together with their recording dates so that changes can be read as program dynamics rather than inconsistencies.

The analytical framework draws on three perspectives. First, the Edwards III (1980) implementation model, which identifies communication, resources, disposition, and bureaucratic structure as determinants of implementation success. Second, public sector coordination theory, which distinguishes coordination mechanisms based on hierarchy, markets, and networks (Bouckaert et al., 2010) and stresses that coordination is a perennial challenge for any cross-sectoral policy (Peters, 2018). This perspective is reinforced by Pressman and Wildavsky's (1984) argument that the more clearance points a program has, the

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lower the probability that implementation proceeds as planned. Third, collaborative governance, which emphasizes starting conditions, institutional design, facilitative leadership, and the collaborative process (Ansell & Gash, 2008; Emerson et al., 2012), together with the concept of multilevel governance that distinguishes territorial from functional jurisdictions (Hooghe & Marks, 2003).

North Sumatra Province is used as a contextual illustration because of its large territory, diverse geography including island areas and disadvantaged regions, and its experience of delivering MBG during a disaster at the end of 2025. This illustration is not intended as a field case study but as a point of comparison to test the relevance of the document analysis findings to regional conditions. A limitation of this study is the absence of primary data from interviews or observation; the findings therefore need to be tested further through empirical research at the district and city levels.

RESULTS AND DISCUSSION

1. The Governance Architecture of MBG and the Position of Regional Governments

The governance architecture of MBG is built on a vertical chain of command. BGN is a government agency that sits under and reports to the President under Presidential Regulation Number 83 of 2024. Below it, Presidential Regulation 115/2025 establishes the Nutrition Fulfillment Service Offices (*Kantor Pelayanan Pemenuhan Gizi*, KPPG) as technical implementing units of BGN accountable to the Head of BGN (Article 1 point 18), tasked with supervising and coordinating SPPG in their working areas (Article 15 paragraph (1)). SPPG themselves are non-structural organizational units under and accountable to the Head of the KPPG. Thus, the units that produce and distribute meals every day sit within BGN's line of accountability, not within the structure of regional government.

At the central level, cross-ministerial coordination is carried out by a coordination team established by the President and chaired by the Coordinating Minister for Food Affairs (Article 30). The Coordinating Ministry for Food Affairs reported that MBG implementation is supported by 28 ministries and agencies (Kemenko Pangan, 2026). This number illustrates the breadth of the network of actors that must be synchronized, spanning food, health, education, public works, and finance.

The position of regional governments is regulated in Articles 42 and 43 of Presidential Regulation 115/2025. Article 42 provides that governors and regents/mayors provide support in accordance with their respective authorities, while the Minister of Home Affairs coordinates, integrates, and synchronizes regional support and supervises regional heads. Article 43 then details this support, including providing land for SPPG through a loan-for-use scheme, building supporting facilities and infrastructure such as sanitation and clean water, accelerating building approvals for KPPG and SPPG, ensuring food safety and issuing SLHS, developing farmers, micro, small, and medium enterprises (MSMEs), and village-owned enterprises (BUM Desa) as suppliers, collecting beneficiary data, managing waste, providing nutrition education, and mobilizing village governments.

This formulation reveals an asymmetry between burden and authority. Regional governments carry tasks that determine service quality, such as land, clean water, hygiene certification, beneficiary data, and supply chains, yet they have no direct control authority over the SPPG operating in their territories. Program operations are funded by the State Budget (Article 59 paragraph (1)), while SPPG construction and implementation support may be funded by the State Budget, regional budgets, and/or other lawful sources (Article 59 paragraph (2) and Article 60 paragraph (1)). Consequently, regions may be asked to provide assets and budgets without controlling how those assets are used in daily operations.

From a multilevel governance perspective, MBG exemplifies a functional jurisdiction superimposed on territorial jurisdictions (Hooghe & Marks, 2003). BGN works on the basis of a nutrition function that cuts across administrative boundaries, while regional governments work on the basis of territorial

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authority guaranteed by regional autonomy. When these two logics are not reconciled in a clear institutional design, every field problem must pass through many clearance points. Pressman and Wildavsky (1984) warn that such complexity of joint action reduces the likelihood of implementation proceeding as planned, even when all actors agree on the program's goals.

The main coordination instrument at the regional level, the Task Force for the Acceleration of MBG Delivery, also did not originate from Presidential Regulation 115/2025 but from directives and circular letters of the Minister of Home Affairs. In July 2025 the Minister asked regional heads to form task forces and appoint their chairs, citing Bogor and Garut Regencies, which appointed their regional secretaries as chairs (DDTCNews, 2025). By September 2025, 141 task forces had been formed at the district level, focusing on facilitating land for SPPG in disadvantaged, frontier, and outermost (3T) regions (Republika, 2025). Because their legal basis is a circular letter, the form, membership, and authority of task forces vary across regions. Some are chaired by regional secretaries, others are led by food security agencies, and still others involve the regional leadership forum (Forkopimda).

The experience of North Sumatra illustrates the same pattern. In July 2025 the central government set a target of 1,732 SPPG for North Sumatra, while only 77 were operating. The governor then required each district and city to build at least three SPPG using regional government resources (Akurat, 2025). In October 2026, BGN inaugurated 232 SPPG in North Sumatra, 59 of which are located in 3T areas spread across 27 districts and cities (Bisnis.com, 2026b). These data show that regional governments make tangible contributions to infrastructure, yet these contributions have not been matched by an equal position in controlling service quality.

2. Dynamics of Inter-Agency Coordination at the Regional Level

The dynamics of MBG coordination at the regional level can be read through Edwards III's (1980) four variables. With respect to communication, regional implementers face rapidly changing policy flows. In less than two years, the program saw the issuance of a governance regulation, new technical guidelines, several circular letters from the Minister of Home Affairs, repeated budget adjustments, and changes in BGN leadership. The President inaugurated Sudaryono as Head of BGN on 22 July 2026, replacing Nanik S. Deyang, who had resigned (Antara, 2026). Such rapid change makes it difficult for regional implementers to interpret policy messages uniformly. Fitriani and Maulidya (2026) found that inconsistent communication and bureaucratic disposition at the regional level were among the main barriers to MBG implementation.

With respect to resources, the most visible constraint lies in food safety assurance capacity. In March 2026, only about 35.6 percent of SPPG held an SLHS, namely 8,700 of 24,443 units (Kontan, 2026). Issuing SLHS is a regional government task under Article 43, so the pace of SPPG construction set by the center directly strains the capacity of regional health agencies, community health centers, and laboratories. Erlyn et al. (2026) found that MBG food safety assurance remains constrained by limited risk-based monitoring, limited supervisory capacity, weak cross-sector coordination, and inconsistent follow-up. This explains why suspected poisoning incidents continue to occur even as the number of sanctioned SPPG increases.

With respect to disposition, political commitment to MBG is very strong because the program is a national priority. However, this commitment tends to be translated into a push to achieve quantitative targets, namely the number of SPPG and beneficiaries. The target of 82.9 million beneficiaries creates incentives to accelerate kitchen operations, while food safety standards require time for certification, food handler training, and inspection. This tension between speed and caution is evident in government policy that simultaneously pursues coverage expansion and suspends hundreds of SPPG that fail to meet standards.

With respect to bureaucratic structure, the main problem is fragmentation. Article 24 of Presidential Regulation 115/2025 provides that food safety and quality supervision is to be integrated,

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continuous, and risk-based, with authority distributed among several agencies and cross-sector coordination by the Coordinating Minister. Article 25 paragraph (1) requires suspected poisoning to be reported immediately by the SPPG or beneficiary representatives to the nearest health facility or to the village head. This flow is not yet explicitly connected to regional task forces, so incident information may be scattered across health centers, schools, villages, KPPG, and the media before it is compiled into actionable data. The Education Monitoring Network of Indonesia (JPPI) has even noted that the results of audits and investigations into poisoning cases have not been made public (NU Online, 2025).

Fragmentation also affects the oversight function. At least four oversight channels currently run in parallel. BGN issues warning letters and suspensions to SPPG. The Ministry of Finance formed a team from the Directorate General of Treasury to monitor MBG implementation in all districts and cities and evaluate it every two months (Kabar Bursa, 2026). The Ministry of Home Affairs, through Circular Letter Number 400.5/8545/SJ, asked regional heads to assign task forces to inspect SPPG and report the results to BGN with a copy to the Ministry. In addition, BGN's internal government auditors conduct internal oversight (Article 56). These channels strengthen vertical oversight but have not yet produced a single horizontal feedback loop at the regional level. In the terms of Bouckaert et al. (2010), MBG coordination is still dominated by hierarchical mechanisms, while the network mechanisms needed to solve cross-sector problems in the field have not been institutionalized.

Data integration is the next problem. Collecting beneficiary data is a regional government task, while SPPG operational data are managed by BGN. The number of beneficiaries reported by various official sources has changed considerably, for example 63.13 million in May 2026 and 57 million served by 27,485 SPPG in September 2026 (Katadata, 2026a). These changes may reflect data verification, SPPG suspensions, and the school calendar. However, they also underline the importance of joint data validation, as emphasized at the coordination meeting on the implementation of Presidential Regulation 115/2025, which made accelerated data validation and food safety standards priorities (Kemenko Pangan, 2026).

Coordination at the service-unit level shows a similar pattern. Sangaji et al. (2026) found that collaborative governance involving education offices, SPPG, schools, health centers, and environmental agencies can emerge at the sub-district level, but its success depends on local leadership and active coordination forums. Nugroho et al. (2025) likewise stress the need for a multi-stakeholder implementation model so that nutritious food policy does not rest on a single institution. These findings are consistent with Ansell and Gash (2008), who identify institutional design and facilitative leadership as prerequisites for successful collaboration.

Nevertheless, network capacity can work when there is a shared sense of urgency. In late November 2025, when floods and landslides struck several areas of North Sumatra, 173 SPPG in the province redirected MBG distribution to disaster-affected residents and delivered 341,765 meal packages (Katadata, 2025). This experience shows that SPPG, BGN's regional office, and regional governments can act quickly when goals, information, and field command are aligned. The problem is that this capacity remains situational and has not become a regular working pattern under normal conditions.

The local economic dimension has also not been fully exploited. In March 2026, MBG involved 94,056 suppliers, including 38,938 MSMEs (Kontan, 2026), meaning that MSMEs accounted for only about 41 percent of all suppliers. Article 43 assigns regional governments to develop farmers, MSMEs, and village-owned enterprises as suppliers, but there is no binding local procurement target. By comparison, Brazil's school feeding program requires part of its budget to be spent on family farming products, so that school feeding also serves as an instrument of rural development (Sidaner et al., 2013). Without measurable targets, regional governments can hardly ensure that MBG spending genuinely strengthens the local economy.

The mapping of actors, mandates, and coordination gaps in MBG delivery at the regional level is presented in Table 1.

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Table 1. Map of Actors, Mandates, and Coordination Gaps in the MBG Program at the Regional Level

Actor	Main Mandate	Identified Coordination Gaps
BGN, KPPG, and SPPG	Program operator; KPPG supervises and coordinates SPPG; SPPG produce and distribute meals.	Vertical chain of command not formally linked to regional agencies; operational data not open to regions.
Provincial and district/city governments	Support for land, infrastructure, building approvals, SLHS, beneficiary data, supply chains, waste, and nutrition education (Article 43).	Carry burdens without control authority; regional budget support not accompanied by joint evaluation.
Regional MBG task forces	Facilitating acceleration, inspecting SPPG, and reporting to BGN.	Legal basis is a circular letter; form and authority vary across regions; some regions have yet to form one.
Health offices, community health centers, and BPOM	Food safety supervision, SLHS, and handling of suspected poisoning.	Limited inspection capacity; incident reporting flow not linked to task forces.
Schools and integrated health posts	Service points for beneficiaries and sources of target data.	Communication with SPPG tends to be one-way and informal.
Ministry of Home Affairs	Coordination, synchronization, and supervision of regional support (Article 42).	Instruments are administrative appeals rather than institutional standards.
Ministry of Finance and Coordinating Ministry for Food Affairs	Fiscal control and cross-ministerial coordination (Article 30).	Layered oversight channels without a single integrated evaluation calendar in the regions.

Source: Compiled from Presidential Regulation 115/2025, circular letters of the Minister of Home Affairs, and official program data (2025–2026).

3. The Risk-Based Layered Coordination Model

Based on these findings, this study proposes a Risk-Based Layered Coordination Model. It is layered because it connects coordination at the central, provincial, district/city, and service-unit levels. It is risk-based because the intensity of coordination and oversight is adjusted to the risk level of each SPPG rather than applied uniformly. The model combines the strengths of existing hierarchical mechanisms with network mechanisms that have not yet been institutionalized (Bouckaert et al., 2010; Emerson et al., 2012).

The first component is a clarified regional mandate. The position of regional governments needs to shift from providers of support to co-implementers. This can be achieved by amending Presidential Regulation 115/2025 or through a joint implementing regulation of BGN and the Ministry of Home Affairs that grants regional governments the right to access SPPG operational data, recommend the suspension of high-risk SPPG, and participate in evaluating KPPG performance in their territories. Without such authority, regional responsibility for service quality will remain moral rather than administrative.

The second component is the institutionalization of task forces. MBG task forces need a stronger legal basis than a circular letter, for example a ministerial regulation that sets out their minimum composition, authority, and working procedures. The recommended composition places the regional secretary as chair and the KPPG as joint secretariat, with the participation of the health office, education office, food security office, regional development planning agency, village community empowerment office, inspectorate, and regional disaster management agency. Task forces should meet regularly and have sub-district forums that connect SPPG, schools, health centers, and village governments.

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The third component is an integrated data system. Beneficiary data, SPPG operational status, SLHS status, inspection results, and incident reports need to be compiled in a single database jointly accessible to BGN and regional governments. This integration can draw on the basic education database, integrated health post data for toddlers and pregnant women, and the electronic government system infrastructure that regions already possess. Part of this data should be made public through a dashboard so that parents, schools, and communities can participate in oversight, while also responding to criticism of the program's low transparency (The Jakarta Post, 2025).

The fourth component is risk-based food safety supervision. SLHS should be a precondition for SPPG operation rather than a document obtained afterwards. Inspection frequency should be determined by risk profile, such as the number of portions, distribution distance and time, incident history, and water source conditions. Reports of suspected poisoning under Article 25 should be automatically relayed to the task force and the KPPG within hours, accompanied by victim-handling procedures and clarity on who bears treatment costs. This approach is consistent with the recommendation of Erlyn et al. (2026) to link certification, operational supervision, cross-sector coordination, and feedback in a single assurance system.

The fifth component is fiscal and local economic accountability. The various oversight channels of the Ministry of Finance, the Ministry of Home Affairs, BGN, and regional inspectorates should be combined into a single joint evaluation calendar at the district/city level to avoid duplicated audits. The government should also set measurable local procurement targets for farmers, MSMEs, cooperatives, and village-owned enterprises. This component becomes even more important because Constitutional Court Decision Number 40/PUU-XXIV/2026 will change the source of MBG financing no later than 2028, so every rupiah spent must be accountable in terms of both nutritional benefits and regional economic impact.

The details of the five components, together with their instruments, responsible parties, and success indicators, are presented in Table 2.

Table 2. Components of the Risk-Based Layered Coordination Model

Component	Main Instrument	Responsible Parties	Success Indicators
Clarified regional mandate	Amendment of Presidential Regulation 115/2025 or a joint regulation of BGN and the Ministry of Home Affairs	President, BGN, Ministry of Home Affairs	Regions have data access and the right to recommend SPPG sanctions
Institutionalized task forces	Ministerial regulation on task force composition and authority; sub-district forums	Ministry of Home Affairs, regional heads	All districts/cities have active task forces holding regular meetings
Integrated data system	Shared database and public dashboard integrated with e-government systems	BGN, communication and informatics offices	Beneficiary and SPPG data validated and jointly accessible
Risk-based food supervision	SLHS as an operating requirement; risk-based inspection; incident reporting flow	Health offices, health centers, BPOM, KPPG	SLHS coverage approaching 100 percent; declining incidents
Fiscal and local economic accountability	Joint evaluation calendar; local procurement targets	Ministry of Finance, inspectorates, food security offices, cooperative and MSME offices	No overlapping audits; growing share of local suppliers

Source: Authors' formulation based on the analysis.

The model can be implemented in stages. In the short term, regional governments can strengthen existing task forces, develop incident escalation procedures, and establish regular coordination forums

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with KPPG without waiting for regulatory changes. In the medium term, ahead of the change in the financing scheme in 2028, the central government needs to provide a stronger legal basis for the regional role and for an integrated data system. From a development administration perspective, the model restores regional governments to their function as agents of development, that is, actors who not only provide facilities but also take part in planning, controlling, and accounting for development outcomes in their territories (Siagian, 2008).

CONCLUSION

The MBG Program demonstrates the state's capacity to expand public services at an extraordinary scale and speed, but it also shows that this speed has not been matched by adequate multilevel governance. The MBG architecture following Presidential Regulation 115/2025 rests on a vertical chain of command from BGN through KPPG to SPPG, while regional governments are positioned as providers of support who carry significant burdens without control authority. As a result, coordination at the regional level is reactive, relies on circular letters and non-uniform task forces, and is weak in data integration, food safety supervision, and the use of local supply chains. The disaster response experience in North Sumatra shows that network capacity exists but has not been institutionalized as a regular working pattern.

This study proposes a Risk-Based Layered Coordination Model consisting of a clarified regional mandate, institutionalized task forces, an integrated data system, risk-based food supervision, and fiscal and local economic accountability. It recommends that the central government clarify the position of regional governments as co-implementers through regulatory amendments, that regional governments promptly institutionalize coordination forums and incident escalation procedures, and that BGN open operational data to regions and the public. Future research should test this model empirically through field studies in several districts and cities with different regional characteristics.

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