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Bridging Data Discrepancies in Indonesia's Self-Assessment System: Consultative Interventions at CV ABC

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ABSTRACT

This article analyzes the process of resolving Surat Permintaan Penjelasan Data dan/atau Keterangan (SP2DK) received by CV ABC, a food and beverage distributor, for the 2022 and 2023 tax years. In Indonesia's self-assessment tax system, discrepancies often arise between taxpayer reports and data held by tax authorities. To address these gaps and enhance compliance, the Directorate General of Taxes (DGT) issues SP2DK as a strategic supervisory instrument. This study utilized a qualitative case study approach with a consultative assistance method (pendampingan). The analysis was conducted through data equalization and a thorough review of relevant tax regulations. The findings revealed common issues such as an unusually low profit margin, unreported bonus income in the form of goods, and data inconsistencies in Income Tax Article 23 and Value-added tax return. Most findings were successfully resolved through clarification and voluntary corrections by the taxpayer. This case highlights the critical importance of professional assistance and strong internal controls to improve tax compliance and overcome administrative complexities, particularly for micro, small, and medium-sized enterprises (MSMEs). The findings of this study are expected to provide practical insights for other taxpayers and serve as a valuable reference for academics and policymakers.

A. INTRODUCTION

Background Analysis of Community Partners

Tax has a crucial role as the primary source of state revenue, which is used to finance development and improve the general welfare of the people. Referring to Law Number 7 of 2021 concerning Harmonisation of Tax Regulations (HPP Law), tax is defined as a compulsory contribution of a compelling nature from individuals or entities to the state, without direct reward. To manage this obligation, Indonesia adopts a self-assessment system that gives complete trust and responsibility to taxpayers to independently calculate, pay, and report the amount of tax owed (Mardiasmo, 2023). However, this autonomy does not eliminate the potential for discrepancies between data reported by taxpayers and data held by tax authorities, which are often caused by errors, negligence, or ignorance.

To bridge this data gap, the Directorate General of Taxes (DGT) issues a Request Letter for Explanation of Data and/or Information (SP2DK). SP2DK is a softer supervisory instrument than tax audit, aiming to request clarification on alleged non-compliance. The issuance of SP2DK is based on the Account Representative's (AR) analysis of DGT's internal data, taxpayers' tax return reports, data from third parties (ILAP), and other sources. As such, SP2DK is no longer just another clarification document, but has evolved into a proactive compliance risk management tool designed to nurture taxpayers towards material compliance before moving on to more formal compliance testing.

CV ABC, a food and beverage distributor company, received SP2DK for tax years 2022 and 2023. The issues faced by CV ABC, ranging from unreasonable profit margins to the tax treatment of goods bonuses, reflect the real challenges faced by many taxpayers, particularly MSMEs, in the face of an increasingly digital and data-driven tax system.

Previous studies have shown that the data often focus on the issuance of SP2DK, which varies widely, including the difference in reports in the Periodic Tax Return and Annual Corporate Tax Return. According to Syah (2023), the cause of the issuance of SP2DK is due to the difference between the purchase and sales data reported in the Annual Corporate Tax Return and the DPP of input and output tax invoices at CV XYZ, which is caused by retail sales that are not subject to VAT, delivery of free goods, and less orderly tax administration. Another study by Pratiwi et al., (2021) found differences in the reporting of Periodic Income Tax Article 21 and Annual Corporate Income Tax Return, which resulted in an imbalance between Income Tax Article 21 and Income Tax Article 29 on employee salary costs.

Some studies conclude that the causes of data discrepancies, such as those found by Sukmawati dan Winata (2019); Pratama & Sutomo (2018); Saputri & Rudiyanto (2021); Cahyani (2023); Sayekti & Sarjono (2022); are caused by taxpayers who have not reported the Monthly VAT Return, purchases that have not been credited, or transactions with counterparties that have not been PKP. In addition, the difference also occurs because costs such as Holiday Allowances (THR) and bonuses have not been reported in the Periodic Income Tax Return 21. There is a difference between the costs listed in the Annual Corporate Income Tax Return and the reporting in the Periodic Income Tax Return, Article 23, and Income Tax Article 4 paragraph (2).

The issuance of SP2DK, according to Rivani & Cheisviyanny (2023), aims to confirm various things, such as errors in filling out the SPT, assets that have not been reported, or the calculation of tax payable that is not in accordance with the law. This review shows that the problems faced by CV ABC are common cases that often occur to taxpayers, and proper handling requires a deep understanding of tax regulations and administration.

Based on the problems in CV ABC, this activity aims to provide practical assistance in solving administrative and technical problems to answer the SP2DK submitted by the local Tax Office. The objective is to comprehensively analyze the process of assistance and resolution of SP2DK received by CV ABC, identify the root causes behind the tax authorities' findings, evaluate the strategies taken by taxpayers, and examine the legal and practical implications that arise. Ultimately, this article is expected to serve as a practical guide for other taxpayers and a valuable reference for academics and policymakers.

B. METHODS

This research uses a qualitative approach with a case study design. The chosen method is mentoring, a process of continuous and systematic assistance provided by an expert to help solve a problem. This approach differs from pure descriptive research, as the author is directly involved in the problem-solving process faced by CV ABC, which includes data analysis, consultation, and drafting responses to the SP2DK.

Data Collection and Analysis

The data used in this study consisted of primary data and secondary data. Primary data was obtained from CV ABC's internal documents, including financial statements, annual and periodic tax returns, and all correspondence and supporting documents related to the SP2DK received. Secondary data was obtained from literature reviews and relevant tax laws and regulations, such as the Income Tax Law (Income Tax Law), Value Added Tax Law (Value Added Tax Law), as well as Circular Letters and Minister of Finance Regulations governing SP2DK and specific tax treatments.

The analytical framework used centres on the equalization process. Equalization is a reconciliation or matching process between the data listed in the financial statements and the data reported in various types of tax returns. Once the differences are identified, the next step is to conduct a legal review to interpret the differences in accordance with applicable regulations, such as Article 18 paragraph (3) and Article 4 paragraph (1) of the Income Tax Law, as well as Article 4 paragraph (1) letter a of the VAT Law.

Data Validation Techniques

To ensure the validity and reliability of the findings, this study employed several data validation techniques. *First*, triangulation was conducted by comparing information from multiple sources, including CV ABC’s internal financial records, periodic and annual tax returns, and correspondence related to the SP2DK. *Second*, cross-checking with the local Tax Office (KPP) was performed during the mentoring sessions, where clarifications and confirmations were obtained directly from Account Representatives regarding the interpretation of tax regulations and the accuracy of reported data. *Third*, document verification was applied to ensure consistency between reported figures and supporting evidence such as invoices, payment slips, and e-Faktur records. These validation steps strengthened the credibility of the analysis and ensured that the corrective actions taken were based on accurate and legally sound information.

Timeframe and Location

This service activity is carried out in the form of an internship at CV ABC. The internship schedule lasts for approximately three months, starting from January 27, 2025, to May 25, 2025.

C. RESULTS AND DISCUSSION

CV ABC operates in the food and beverage distribution sector, which involves transactions with both taxable and VAT-exempt goods. This operational complexity, combined with limited tax literacy among finance staff, contributed to the issuance of SP2DK. Understanding these contextual factors is essential to interpreting the nature of the discrepancies and the corrective actions taken.

Analysis of SP2DK Findings (Tax Year 2022)

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Based on the analysis of the SP2DK received, several key findings were found in tax year 2022, as follows:

Selling Price Below Purchase Price and Unreasonable Profit Margin. The Tax Office found that CV ABC set the selling price below the purchase price, which resulted in an unreasonable profit margin. The taxpayer explained that this strategy was part of business risk management, such as the sale of goods close to the expiry date, price competition, and limited warehouse capacity. The taxpayer also applied the cross-subsidization method, where losses on one product item were covered by profits from another item. Nonetheless, CV ABC is willing to amend the Annual Tax Return and adjust the gross margin to 3.2%, which implies an increase in business turnover of IDR 274,601,960. From a fiscal perspective, this is in accordance with the provisions of Article 18 paragraph (3) of the Income Tax Law, which authorises the Director General of Taxes to correct income if the taxpayer's report does not meet the principles of reasonableness and business prevalence.

Unreported Goods Bonus Income. The Tax Office found other income in the form of product bonuses from suppliers that have not been reported as income. The taxpayer acknowledges this finding and is willing to make corrections to the Annual Tax Return. In accordance with Article 4 paragraph (1) of the Income Tax Law, the tax object is any additional economic capacity, including bonuses, gifts, or rewards in any form.

Difference between Purchasing Expenses and Input VAT. The Tax Office identified a difference between the purchase expenses reported in the financial statements and the creditable input VAT. The taxpayer explained that this difference of IDR 1,776,316,263 came from the purchase of sugar, which is a basic need item that is not subject to VAT and does not require a tax invoice. This finding indicates an administrative challenge for taxpayers who have mixed transactions between taxable goods and VAT-exempt goods in accordance with PMK No. 99/PMK.010/2020.

Difference in Income Tax Article 23 and Final Income Tax Objects. The Tax Office found a difference between the costs in the profit/loss statement and the reported objects of Income Tax Article 23 and Final Income Tax Article 4 paragraph (2). The taxpayer managed to prove that all tax withholding and remittance obligations have been made and reported in the Unification Tax Return, supported by payment records.

The following is a summary of supporting data submitted by taxpayers for 2022:

Table 1. Details of Sugar Purchases Year 2022

Purchase with invoice	8.478.975.000	931.364.500
Purchase of sugar by invoice	1.115.972.542	
Purchase of sugar without an invoice at the sales	660.400.000	
Total	**10.255.347.542**	

Table 2. Recapitulation of Income Tax Article 23 Year 2022

Period	DPP	Income Tax 23	Pay Date	Report Date
Januari				
February	350.000	7.000	15/03/2022	19/03/2022
March	350.000	7.000	14/04/2022	14/04/2022
April	350.000	7.000	19/05/2022	20/05/2022

May	30.708.500	614.170	14/06/2022	14/06/2022
	350.000	7.000	14/06/2022	
Juni	21.600.000	432.000	11/07/2022	17/07/2022
	350.000	7.000	11/07/2022	
July	7.803.000	156.060	09/08/2022	16/08/2022
	350.000	7.000		
August	16.470.000	329.400	12/09/2022	18/09/2022
	350.000	7.000	12/09/2022	
September	14.261.000	285.220	10/10/2022	17/10/2022
	350.000	7.000	10/10/2022	
October	14.632.500	292.650	10/11/2022	15/11/2022
	350.000	7.000	10/11/2022	
November	17.128.500	342.570	12/12/2022	18/12/2022
	350.000	7.000		
December	16.667.000	333.340	12/01/2023	16/01/2023
Total	142.770.500	2.834.410		

Table 3. Recapitulation of Final Income Tax on Rent in 2022

Period	DPP	Final Income Tax	Pay Date	Report Date
Januari	5.000.000	500.000	15/02/2022	22/02/2022
February	5.000.000	500.000	10/03/2022	14/03/2022
March	5.000.000	500.000	14/04/2022	16/04/2022
April	5.000.000	500.000	12/05/2022	20/05/2022
May	5.000.000	500.000	09/06/2022	14/06/2022
Juni	5.000.000	500.000	11/07/2022	17/07/2022
July	5.000.000	500.000	09/08/2022	16/08/2022
August	5.000.000	500.000	12/09/2022	18/09/2022
September	5.000.000	500.000	10/10/2022	17/10/2022
October	5.000.000	500.000	15/11/2022	15/11/2022
November	5.000.000	500.000	09/11/2022	18/12/2022
December	5.000.000	500.000	10/01/2023	16/01/2023
TOTAL	142.770.500	2.834.410		

Analysis of SP2DK Findings (Tax Year 2023)

The pattern of findings in 2023 is almost the same as the previous year. KPP again found too small a profit margin (2.82% compared to 3.18% in the previous year) and bonuses that had not been reported as income. Taxpayers responded to these findings by agreeing to amend the Annual Tax Return to adjust margins and recognise bonus income. In addition, the Tax Office also found that the taxpayer did not correctly calculate the VAT payable from the backwards VAT delivery. This finding is the result of a secondary adjustment, which is an adjustment made to the VAT liability after a correction to the Taxable Income (PPh). Taxpayers can clarify this finding by presenting data reconciliation that shows that the sales reported in the Annual Tax Return are in accordance with the VAT remittance that has been reported.

Table 4. Recapitulation of Income Tax Article 23 Year 2023

Period	DPP	Income Tax 23	Pay Date	Report Date
Januari	8.203.500	164.070	15/02/2023	01/04/2023
March	27.781.250	555.625	06/04/2023	11/04/2023
April	19.150.000	383.000	15/05/2023	20/05/2023
May	24.706.750	494.135	08/06/2023	27/06/2023
Juni	9.800.000	196.000	12/07/2023	26/07/2023
July	44.779.500	895.590	09/08/2023	20/08/2023
August	3.600.000	72.000	09/09/2023	10/09/2023
September	37.814.000	756.280	10/10/2023	20/10/2023
October	37.790.000	755.800	09/11/2023	24/11/2023
November	19.972.500	399.450	06/12/2023	14/12/2023
December	15.839.000	316.780	06/01/2024	12/01/2024
TOTAL	249.463.500	4.988.730		

Table 5. Recap of Sugar Sales in 2023

Sales other than sugar	58.556.135.316
Other than sugar already reported	58.556.135.316
Difference	0
Sugar sales	12.246.157.000
Reported sugar	12.246.157.000
Difference	0
Submission of VAT return	70.802.292.316
Sales in annual tax return	70.802.292.316
Difference	0

The CV ABC case reflects how the Directorate General of Taxes (DGT) carries out the compliance monitoring function through the issuance of SP2DK based on compliance risk management, which emphasises guidance and data clarification before entering the formal audit stage. Findings in the form of unreasonable profit margins, bonuses for goods not reported as income, and differences in equalisation between purchases and VAT show the typical problems often experienced by the food and beverage trade sector. This challenge is actually not an isolated phenomenon, but also occurs in other sectors, such as pharmaceuticals or electronics, where goods bonuses from principals often lead to debates whether they should be recognised as income or only considered as a deduction from the cost of goods sold. In terms of policy, DGT has consistently emphasised that bonus goods are additional income that must be reported in accordance with the provisions of Article 4 paragraph (1) of the Income Tax Law.

In addition, the difference in VAT treatment between taxable goods and exempted basic necessities (e.g. sugar, rice, and corn) also adds administrative complexity for sub-distributors. Taxpayers must carefully separate the records between goods subject to VAT and those that are not, which often results in data discrepancies during invoice reconciliation. This condition shows that the VAT exemption policy, although aimed at protecting people's purchasing power, creates administrative challenges for the business world. This also illustrates that protective fiscal policies sometimes result in an increased risk of non-compliance, both intentional and unintentional.

D. CONCLUSION

Based on the case study analysis of the settlement of CV ABC's SP2DK for tax years 2022 and 2023, it can be concluded that most of the findings submitted by the Tax Office were successfully addressed. The taxpayers showed a cooperative attitude by providing clarifications and making voluntary corrections on several points, including too low profit margins, recognition of income from bonus goods, and corrections to VAT payable. Findings caused by explainable data discrepancies, such as sugar purchases for which no VAT was payable and Income Tax Article 23/Final deductions that had already been deposited, were successfully clarified by showing complete documentary evidence.

This result confirms the crucial role of mentoring in bridging the knowledge and understanding gap between taxpayers and tax authorities, thus enabling a cooperative and efficient resolution. The case of CV ABC specifically illustrates that while the self-assessment system places the onus on taxpayers, many companies, particularly in the MSME segment, still require guidance to ensure that their administrative practices are in line with the complex regulations. This case study is an important contribution to the literature, providing concrete examples of the challenges and solutions in tax compliance practices in the era of data digitisation.

To prevent the recurrence of SP2DK issuance, CV ABC and other taxpayers are advised to improve the accuracy and consistency of internal records proactively. Taxpayers need to conduct periodic equalisation as a form of proactive self-assessment, comparing financial statement data with all periodic and annual tax returns reported. The use of technology such as integrated e-Faktur and e-Bupot can help minimize human error and simplify the reconciliation process. In addition, increased understanding through continuous taxation training for finance staff is essential to be able to adapt to dynamic regulations.

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F. AUTHOR CONTRIBUTIONS

Yuli Astini led the field mentoring activities, conducted the data reconciliation, and drafted the initial manuscript. **Pancawati Hardiningsih** contributed to the legal analysis, literature review, and refinement of the research methodology. Both authors jointly reviewed and approved the final version of the manuscript.

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