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The Effect of the Final Income Tax Rate for MSMEs on Final Income Tax Revenue from MSMEs: The Mediating Role of the Number of Taxpayers at the Solok Primary Tax Office

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A R T I C L E I N F O

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A B S T R A C T

Revenue from Micro, Small, and Medium Enterprise (MSME) Final Income Tax (PPh Final) at the Solok Primary Tax Office remains low and fluctuates despite the reduction of the MSME Final Income Tax rate from 1% to 0.5%. This study aims to analyze the effect of the MSME Final Income Tax rate on MSME Final Income Tax revenue and to examine the mediating role of the number of taxpayers making payments at the Solok Primary Tax Office. A quantitative approach was applied using secondary semi-annual time-series data from July 2013 to December 2024, obtained from the tax administration records of the Solok Primary Tax Office. The Autoregressive Distributed Lag (ARDL) model was employed to examine short-run and long-run relationships, while the mediation effect was tested using the delta method. The results show that the MSME Final Income Tax rate does not significantly affect either tax revenue or the number of paying taxpayers, either in the short run or the long run. The number of paying taxpayers has a positive effect on MSME Final Income Tax revenue at the 10% significance level, but it does not significantly mediate the relationship between the tax rate and tax revenue. These findings indicate that the effectiveness of the MSME Final Income Tax policy depends more on taxpayer compliance and participation than on tax-rate changes alone.

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INTRODUCTION

Tax revenue is the primary source of state revenue within the State Budget (APBN). Based on Law Number 19 of 2023 concerning the 2024 State Budget, tax revenue is projected to reach IDR 2,309.9 trillion, or approximately 82.43% of total state revenue of IDR 2,802.3 trillion. This situation confirms that optimizing tax revenue is a priority of national fiscal policy.

Micro, small, and medium enterprises (MSMEs) have significant potential to support tax revenue. The Ministry of Finance (2021) and the Coordinating Ministry for Economic Affairs (2021) noted that the number of MSMEs in Indonesia reached 64.2 million units, contributing 61.07% of Gross Domestic Product (Rp8,573.89 trillion), and absorbing 97% of the workforce. However, the contribution of MSMEs to tax revenue remains relatively low. Putri et al. (2024) found that MSME income tax revenue has not significantly contributed to the total income tax revenue of individual and corporate taxpayers at the Tanjung Priuk Tax Office.

Table 1 shows that the contribution of MSME Final Income Tax revenue to total revenue of the Solok Pratama Tax Office (KPP Pratama Solok) is still small. MSME Final Income Tax revenue increased from Rp1.163 billion in 2014 to Rp4.914 billion in 2018, but decreased to Rp2.688 billion in 2024. Its contribution to total revenue also decreased from 0.786% in 2018 to 0.349% in 2024 (KPP Pratama Solok, 2024).

Table 1. Solok Pratama Tax Office Revenue 2014–2024

Year	Final Income Tax Receipt for MSMEs (Rp)	Total Revenue (Rp)	MSME Final Income Tax Contribution (%)
2014	1,163,364,934	343,532,574,271	0.339
2015	2,453,408,350	491,546,194,422	0.499
2016	2,576,031,952	545,738,504,034	0.472
2017	3,568,932,108	580.391.113.063	0.615
2018	4,914,128,325	625,021,471,776	0.786
2019	4,207,337,805	622,249,913,847	0.676
2020	3,238,783,134	492,004,974,930	0.658
2021	3,619,408,433	638,156,777,696	0.567
2022	3,864,677,680	808,793,846,737	0.478
2023	2,985,316,097	779.263.720.459	0.383
2024	2,687,654,904	769,653,108,510	0.349

Source: Solok Pratama Tax Office Revenue Data (2024)

Low final income tax revenue for MSMEs can be influenced by the low number of taxpayers, limited economic activity, and suboptimal tax compliance (Harahap, 2020). Taxpayer compliance is also influenced by an understanding of the self-assessment system, the quality of business records, and the effectiveness of tax outreach and services. Listiyowati et al. (2021) demonstrated that the implementation of the self-assessment system has a positive and significant impact on taxpayer compliance.

In an effort to encourage MSME participation in the tax system, the government, through Government Regulation Number 23 of 2018, reduced the Final Income Tax rate for MSMEs from 1% to 0.5% of gross income, effective July 1, 2018 (Directorate General of Taxes, 2018). This policy is expected to ease the tax burden on MSMEs, improve cash flow, encourage voluntary compliance, broaden the tax base, and increase tax revenue in the long term (Carroll, 2008; Hani & Daoed, 2013; Tjen, 2021). Ibn Khaldun's tax framework also emphasizes that lower rates can stimulate economic growth, improve compliance, broaden the tax base, and ultimately increase state revenue (Islahi, 2015).

However, empirical evidence regarding the impact of rate reductions on tax revenue remains inconsistent. Yulizar and Apriliawati (2020) and Sephiani and Syafitri (2023) found that MSMEs' Final Income Tax revenue decreased after the implementation of Government Regulation No. 23 of 2018, despite an increase in the number of taxpayers. Conversely, Herprabangkoro and Rosdiana (2024) found that MSMEs' Final Income Tax rate reductions significantly impacted state revenue and taxpayer compliance. Similar findings suggest that changes in Final Income Tax rates can impact MSME taxpayer compliance (Fadhila & Sanjaya, 2022; Kumaratih & Ispriyarso, 2020).

These differences in results indicate a research gap regarding the mechanism by which rates influence tax revenue. The effect of tax rates is not always direct; the number of taxpayers actively paying can act as a connecting mechanism between rates and tax revenue. The more taxpayers who comply and make payments, the greater the potential tax revenue collected. Therefore, referring to Baron and Kenny's (1986) mediation framework, the number of taxpayers is positioned as a mediating variable in the relationship between MSME final income tax rates and MSME final income tax revenue.

This research was conducted at the Solok Pratama Tax Office (KPP Pratama), which covers Solok City, Solok Regency, South Solok Regency, Dharmasraya Regency, and Sawahlunto City. Data shows that the number of taxpayers increased from 1,691 in 2014 to 10,726 in 2019, but decreased to 1,664 in 2024. This fluctuation indicates that tariff changes do not necessarily guarantee increased participation and tax revenue for MSMEs.

The novelty of this research lies in three aspects. First, this study not only examines the direct effect of the MSME Final Income Tax rate on tax revenue but also examines the mediating role of the number of taxpayers. Second, the analysis covers the development of MSME Final Income Tax policies in Government Regulation Number 46 of 2013, Government Regulation Number 23 of 2018, and Government Regulation Number 55 of 2022, including the facility of income tax exemption on the portion of gross turnover of up to IDR 500 million per year for MSME Individual Taxpayers (Directorate General of Taxes, 2024). Third, this study uses the ARDL model to examine the dynamics of short-term and long-term relationships in the Solok Pratama Tax Office area during the period of July 2013 to December 2024.

Based on these problems, the objectives of this study are to analyze: (1) the influence of the UMKM Final Income Tax rate on UMKM Final Income Tax revenue; (2) the influence of the UMKM Final Income Tax rate on the number of

paying Taxpayers; (3) the influence of the number of paying Taxpayers on UMKM Final Income Tax revenue; and (4) the mediating role of the number of paying Taxpayers in the relationship between the UMKM Final Income Tax rate and UMKM Final Income Tax revenue at the Solok Pratama Tax Office.

LITERATURE REVIEW

This research is based on tax compliance theory, attribution theory, perceived tax burden theory, and Ibn Khaldun's tax theory. These four theories explain how the final income tax rate for MSMEs can influence taxpayer behavior, the number of taxpayers making payments, and the receipt of final income tax by MSMEs.

Tax compliance theory states that taxpayer compliance is influenced by tax rates, administrative complexity, audits, sanctions, and perceptions of tax fairness (Allingham & Sandmo, 1972; Kirchler et al., 2008). In the context of MSMEs, lower rates and simplified taxation have the potential to encourage compliance and increase the number of taxpayers making payments.

Attribution theory explains that taxpayers assess the causes and fairness of a policy based on cognitive and affective perceptions (Heider, 1958; Weiner, 1985). If the final income tax rate for MSMEs is perceived as reasonable and provides economic benefits, taxpayers are more likely to comply with their tax obligations. Conversely, a rate perceived as too high can lead to resistance to paying taxes.

The theory of perceived tax burden emphasizes that taxpayer behavior is influenced by subjectively perceived tax burdens, including liquidity burden and compliance cost burden (Eichfelder & Hechtner, 2018; Sandford et al., 1989). The reduction in the final income tax rate for MSMEs from 1% to 0.5% through Government Regulation Number 23 of 2018 can reduce the perceived tax burden, increase taxpayer willingness to pay, and expand the number of active taxpayers (Directorate General of Taxes, 2018).

Ibn Khaldun's tax theory asserts that excessively high tax rates can reduce productivity and narrow the tax base, while lower rates can stimulate economic activity and increase state revenue in the long run (Ibn Khaldun, 2015; Islahi, 2015). This view aligns with the Laffer curve concept, which states that lower rates can be offset by expanding the tax base through increased taxpayer compliance and participation.

Conceptual Framework and Hypothesis

The final income tax rate for MSMEs is thought to directly influence MSMEs' final income tax revenue through the size of the tax liability per unit of turnover and indirectly through increased compliance and the number of taxpayers making payments. Lower rates are expected to reduce the perceived tax burden, increase perceptions of fairness, broaden the tax base, and encourage taxpayer participation in tax payments (Allingham & Sandmo, 1972; Islahi, 2015).

Research Hypothesis:

- **H1:**The MSME Final Income Tax rate has a significant impact on the receipt of MSME Final Income Tax at the Solok Pratama Tax Office.
- **H2:**The Final Income Tax Rate for MSMEs has a significant impact on the number of taxpayers paying at the Solok Pratama Tax Office.
- **H3:**The number of taxpayers paying has a positive effect on the receipt of Final Income Tax for MSMEs at the Solok Pratama Tax Office.
- **H4:**The MSME Final Income Tax rate has a significant impact on MSME Final Income Tax receipts through the mediation of the number of paying Taxpayers.

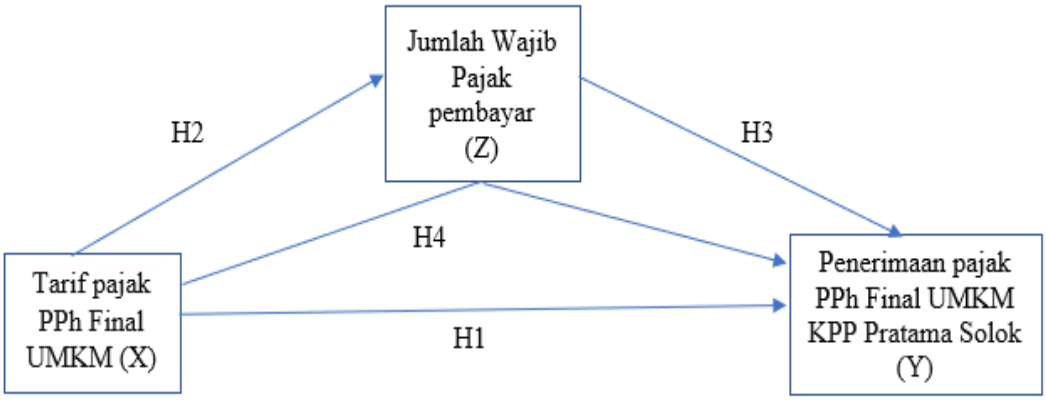


Figure 1. Research Concept Framework

METHODOLOGY

Types and Approaches of Research

This study uses a quantitative approach with causality analysis to examine the effect of the MSME Final Income Tax rate on MSME Final Income Tax revenue, both directly and through the mediation of the number of taxpayers. The quantitative approach was used because the research data is in numerical form, and the hypotheses are tested objectively through statistical analysis (Creswell & Creswell, 2018).

Population, Sample, and Data

The study population comprised all final income tax administration activities for MSMEs at the Solok Pratama Tax Office (KPP Pratama) from July 2013 to December 2024. The sample was determined using a purposive sampling technique, using all available and complete semester observations during the study period. Thus, there were 23 semester observations, from Semester II of 2013 to Semester II of 2024.

The data used is secondary time series data sourced from the Solok Pratama Tax Office (KPP Pratama) tax administration. The data includes MSME Final Income Tax rates, MSME Final Income Tax revenues, and the number of taxpayers. The use of secondary data allows for objective analysis of the dynamics of tax rate policies and tax revenue performance over a long period.

Operational Definition of Variables

Table 2. Operational Definition of Variables

Variables	Symbol	Operational Definition	Scale
Final Income Tax Rates for MSMEs	X	The final income tax rate applicable to MSMEs each semester is 1% before July 1, 2018 and 0.5% thereafter.	Ratio
Number of Taxpayers who made payments	Z	Number of Taxpayers who pay Final Income Tax payments each semester	Ratio
Receipt of Final Income Tax for MSMEs	Y	The amount of Final Income Tax revenue from MSMEs collected by the Solok Pratama Tax Office each semester, in Rupiah	Ratio

Data Collection Techniques

Data were collected through documentation techniques on the Solok Pratama Tax Office's tax receipt and administration reports. The data collection procedures were carried out as follows: (1) requesting permission to collect data from the Solok Pratama Tax Office; (2) collecting data on MSME Final Income Tax rates, MSME Final Income Tax receipts, and the number of taxpayers paying per semester; (3) verifying the completeness and consistency of data between periods; and (4) compiling data in a semi-annual time series format for analysis purposes.

Data Analysis Techniques

Data analysis was performed using the Autoregressive Distributed Lag (ARDL) model. This model was chosen because it is capable of testing short-term and long-term relationships between variables and can be used on time series data with different integration orders, namely I(0) and I(1), but not on second-order integrated data, I(2).

The analysis stages include: (1) data stationarity test using the unit root test; (2) determining the optimal lag; (3) cointegration bounds test to test the existence of long-term relationships; (4) short-term and long-term ARDL model estimation; (5) model diagnostic tests, including autocorrelation, heteroscedasticity, residual normality, and model stability tests; and (6) testing the mediation effect using the delta method.

The research model is generally stated as follows:

$$Yt=a0+a1Xt+a2Zt+\varepsilon t$$

where Yt is the receipt of Final Income Tax for MSMEs, Xt is the Final Income Tax rate for MSMEs, Zt is the number of Taxpayers making payments, and$\varepsilon t$is the error term.

The mediation effect is tested by calculating the indirect effect of tariffs on revenue through the number of taxpayers. The indirect effect is tested using the delta method, with the criterion for significant mediation being if the test statistic value is greater than the critical value at the 5% significance level (Widhiarso, 2010).

Table 3. Research Data

Semester	MSME Tax Rates	Final Income Tax Receipt for MSMEs (Rp)	Number of Taxpayers Making Payments
2013-II	1%	127,507,665	250
2014-I	1%	450,714,532	1,028
2014-II	1%	712,650,402	956
2015-I	1%	1,091,199,060	1,588
2015-II	1%	1,362,209,290	1,763
2016-I	1%	1,360,748,934	2,753
2016-II	1%	1,215,283,018	1,908
2017-I	1%	1,899,425,721	2,547
2017-II	1%	1,669,506,387	3,751
2018-I	1%	1,794,988,656	3,257
2018-II	0.50%	2,057,418,291	4,785
2019-I	0.50%	2,209,171,671	6,269
2019-II	0.50%	1,998,166,134	5,706
2020-I	0.50%	1,622,199,032	4,001
2020-II	0.50%	1,616,584,102	3,098
2021-I	0.50%	1,742,618,666	4,171
2021-II	0.50%	1,876,789,767	3,146
2022-I	0.50%	2,238,689,504	3,785
2022-II	0.50%	1,625,988,176	2,114
2023-I	0.50%	1,496,984,215	1,365
2023-II	0.50%	1,488,331,882	1,150
2024-I	0.50%	1,288,131,269	915
2024-II	0.50%	1,399,523,635	990

Source: Tax Revenue and Administration Data of Solok Pratama Tax Office (2026)

RESEARCH RESULTS AND DISCUSSION

The Influence of MSME Final Income Tax Rates on MSME Final Income Tax Revenue

H1: The MSME Final Income Tax rate has a significant impact on the receipt of MSME Final Income Tax at the Solok Pratama Tax Office.

The ARDL estimation results show that the MSME Final Income Tax rate does not have a significant effect on MSME Final Income Tax revenue, both in the long term (β= -0.1219; p= 0.5090) and short term (β= - 0,0555; p = 0.5205). Thus, H1 is rejected.

These findings indicate that the rate reduction from 1% to 0.5% was not sufficient to increase MSME Final Income Tax revenue through expanding the tax base. These findings align with Yulizar and Apriliawati (2020) and Sephiani and Syafitri (2023), who found a decrease in MSME Final Income Tax revenue following the implementation of Government Regulation No. 23 of 2018. However, these findings do not support the findings of Herprabangkoro and

Rosdiana (2024), who found a significant effect of the rate reduction on state revenue and taxpayer compliance.

Theoretically, these results can be explained through the theories of perceived tax burden and tax compliance. While rate reductions have the potential to reduce the perceived tax burden, rate changes may not necessarily increase compliance if taxpayers face challenges in tax understanding, compliance costs, and administrative limitations (Eichfelder & Hechtner, 2018; Kirchler et al., 2008).

The Influence of the Final Income Tax Rate for MSMEs on the Number of Taxpayers

H2: The MSME Final Income Tax rate affects the number of Taxpayers who make MSME Final Income Tax payments at the Solok Pratama Tax Office.

The coefficient of the rate on the number of taxpayers paying is positive and not significant.$\beta = 5.4914$; $p = 0.4555$)The direction of the coefficient is also inconsistent with theoretical predictions. Thus, H2 is rejected.

These findings indicate that MSME taxpayer compliance is more influenced by other factors, such as tax awareness, ease of administration, quality of tax authorities' services, and business conditions. These results align with Kumaratih and Ispriyarso (2020), who found that rate changes do not always significantly impact MSME taxpayer compliance. These findings also reinforce the argument of Listiyowati et al. (2021) that taxpayer compliance is more determined by the effectiveness of the self-assessment system, tax outreach, and tax authorities' services.

The Influence of the Number of Taxpayers on the Receipt of Final Income Tax for MSMEs

H3: The number of Taxpayers who make Final Income Tax payments for MSMEs has a positive effect on the receipt of Final Income Tax for MSMEs at the Solok Pratama Tax Office.

The number of taxpayers paying has a positive effect on the receipt of Final Income Tax for MSMEs($\beta = 0.2092$; $p = 0.0841$). The coefficient is significant at the 10% level, but not significant at the 5% level. Thus, H3 is partially accepted.

These findings indicate that an increase in the number of taxpayers making payments tends to increase MSMEs' final income tax revenue. However, its contribution remains limited, likely because the increase in the number of taxpayers is not always accompanied by an increase in turnover or tax remittances. These results align with Harahap (2020), who asserted that MSME tax revenue is influenced by the level of taxpayer participation and compliance.

The Effect of Tariffs on Revenue through the Number of Taxpayers

H4: The MSME Final Income Tax rate has a significant impact on MSME Final Income Tax receipts through the mediation of the number of Taxpayers who make MSME Final Income Tax payments.

Testing the indirect effect using the delta method yielded a mediation effect value of 1.1475 with a t-value of 0.7074. Since the t-value is <1.96, mediation is not significant at the 5% level. Thus, H4 is rejected.

These results indicate that the number of taxpayers has not been proven to be a significant mediating mechanism in the relationship between the MSME Final Income Tax rate and MSME Final Income Tax revenue. This finding does not support Baron and Kenny's (1986) mediation framework in the context of this study. A possible reason is that the rate has not significantly influenced the number of taxpayers, so a mediation pathway was not statistically established.

Table 4. Summary of Hypothesis Testing Results

Hypothesis	**Influence**	**Coefficient**	**p-value / test**	**Decision**
H1	Tariff → Final Income Tax Receipt for MSMEs (long term)	-0.1219	0.5090	Rejected
H1	Tariff → Final Income Tax Receipt for MSMEs (short term)	-0.0555	0.5205	Rejected
H2	Rate → Number of taxpayers paying	5,4914	0.4555	Rejected
H3	Number of taxpayers paying → Final Income Tax Receipt for MSMEs	0.2092	0.0841	Partially accepted
H4	Rates → Revenue through the number of taxpayers paying	1.1475	t = 0.7074	Rejected

Source: Processed research data (2024)

Short-Term Dynamics Analysis

The ARDL model does not show cointegration (F-statistic = 3.398 < 3.62), so the long-term relationship cannot be tested validly. However, the final income tax rate for MSMEs in the previous period had a negative and significant effect on the change in the number of taxpayers in the current period (D(LX-1} = -0.9173; p = 0.039). These findings indicate that taxpayer responses to rate changes are gradual and dynamic. Changes in rate policy do not necessarily alter taxpayer payment behavior, but they can influence the number of taxpayers paying in subsequent periods. Therefore, rate policies need to be supported by tax education, administrative simplification, and improved tax services.

Policy Implications

The implementation of Final Income Tax on MSMEs at the Solok Pratama Tax Office has undergone three policy regimes, namely Government Regulation Number 46 of 2013 with a rate of 1%, Government Regulation Number 23 of 2018 with a rate of 0.5%, and Government Regulation Number 55 of 2022 which provides Final Income Tax exemption facilities for the portion of gross turnover

of up to IDR 500 million per year for Individual MSME Taxpayers (Directorate General of Taxes, 2024). Therefore, the decrease in the number of paying or receiving Taxpayers after the implementation of Government Regulation Number 55 of 2022 cannot be directly interpreted as a decrease in compliance. This condition may also reflect the impact of affirmative policies for small-scale MSMEs.

Overall, the research results show that the effectiveness of the Final Income Tax (PPh) policy for MSMEs is determined not only by the tax rate, but also by the dynamics of taxpayer compliance. Tariff adjustments need to be accompanied by tax education, administrative simplification, proportional oversight, and strengthening voluntary compliance to ensure a sustainable increase in Final Income Tax (PPh) revenue for MSMEs.

CONCLUSION RECOMMENDATION

This study aims to analyze the effect of the MSME Final Income Tax rate on MSME Final Income Tax revenue, with the number of taxpayers as a mediating variable at the Solok Pratama Tax Office (KPP Pratama). Based on the ARDL model estimation results and mediation tests, the MSME Final Income Tax rate does not significantly affect MSME Final Income Tax revenue or the number of taxpayers. This finding confirms that rate changes do not automatically increase tax revenue because taxpayer responses are also influenced by tax understanding, perceptions of fairness, and ease of administration.

The number of taxpayers paying has a positive effect on MSMEs' Final Income Tax revenue, although its significance is limited to 10%. This suggests that tax revenue is more related to taxpayer participation and compliance than to changes in rates. However, the number of taxpayers paying has not been proven to be a significant mediator in the relationship between rates and MSMEs' Final Income Tax revenue. However, short-term results indicate that the rate in the previous period influences the change in the number of taxpayers in the subsequent period. This indicates that the effects of tax policy operate dynamically and gradually, rather than as a stable, direct relationship over the long term.

ADVANCED RESEARCH

This study has several limitations. First, the number of semiannual observations is relatively limited, so the ARDL estimation results require careful interpretation. Second, the study only used three main variables and did not include other factors that could influence tax revenue and compliance, such as tax literacy, turnover, economic conditions, quality of tax services, and perceptions of tax fairness. Third, the analysis was conducted at a single Pratama Tax Office (KPP Pratama), so generalizing the results to other regions requires selective consideration.

The Solok Pratama Tax Office (KPP Pratama) is advised to focus not only on increasing the number of taxpayers but also on improving the quality of compliance through education, mentoring, and more personalized monitoring of

MSMEs. This approach is expected to strengthen taxpayer awareness and willingness to fulfill their tax obligations.

Future research is recommended to incorporate other variables that could potentially influence MSME revenue and compliance, such as tax literacy, business conditions, income levels, quality of tax services, and perceptions of tax fairness. The use of monthly or quarterly data and cross-regional comparisons could also strengthen the analysis of the dynamics of MSME Final Income Tax compliance and revenue.

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