

ANALYSIS OF THE APPLICATION OF THE AVERAGE EFFECTIVE RATE (TER) TO THE CALCULATION OF THE ARTICLE 21 INCOME TAX FOR PERMANENT EMPLOYEES AT PT XYZ

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Abstrak

Penelitian ini bertujuan untuk menganalisis penerapan kebijakan Tarif Efektif Rata-Rata (TER) PPh Pasal 21 dan dampaknya terhadap karyawan tetap PT XYZ, khususnya terkait kendala transisi regulasi. Metode yang digunakan yaitu deskriptif kualitatif dengan pendekatan studi kasus suatu Perusahaan XYZ dengan teknik pengumpulan data melalui wawancara, observasi, dan studi dokumentasi. Hasil penelitian menunjukkan bahwa: 1). TER menyederhanakan administrasi pajak Januari–November, meski transisinya mengalami keterlambatan penyesuaian sistem *payroll* internal. 2). Komponen penghasilan tidak teratur (bonus, lembur, dan THR) menyebabkan lonjakan pada penghasilan bruto bulanan, sehingga tarif otomatis bergeser ke lapisan TER yang lebih tinggi. 3). Pergeseran tarif memicu fluktuasi potongan bulanan yang drastis dan mengakibatkan lebih bayar signifikan pada masa Desember saat dihitung ulang dengan tarif Pasal 17. 4). Persepsi karyawan terhadap penerapan TER bervariasi. PT XYZ disarankan untuk mempercepat upgrade sistem *payroll* serta mengevaluasi kembali skema penjadwalan komponen tidak teratur agar potongan pajak bulanan karyawan menjadi lebih stabil dan terprediksi.

Kata Kunci: Karyawan Tetap, PMK Nomor 168 Tahun 2023, PPh Pasal 21, PP No. 58 Tahun 2023, Tarif Efektif Rata-Rata (TER)

Abstract

This study aims to analyze the implementation of the Average Effective Rate (TER) policy for Article 21 Income Tax and its impact on permanent employees at PT XYZ, particularly regarding challenges associated with the regulatory transition. A descriptive-qualitative method was employed using a case study approach focused on PT XYZ, with data collected through interviews, observations, and document analysis. The findings indicate that: 1) The TER simplifies tax administration for the January–November period, although the transition was delayed by the need to adjust internal payroll systems. 2) Irregular income components (bonuses, overtime pay, and holiday allowances/THR) cause spikes in monthly gross income, automatically shifting the applicable rate to a higher TER bracket. 3) Rate changes triggers

drastic fluctuations in monthly tax deductions and results in significant overpayment during the December reconciliation, when taxes are recalculated using the standard Article 17 rates. 4) Employee perceptions regarding the TER implementation vary. It is recommended that PT XYZ accelerate payroll system upgrades and re-evaluate the scheduling of irregular income components to ensure that monthly tax deductions become more stable and predictable for employees.

Keywords: Permanent Employees, PMK 168 of 2023, Article 21 Income Tax, Government Regulation 58 of 2023, Average Effective Rate (TER)

A. INTRODUCTION [Times New Roman 12, Bold]

Article 21 Income Tax (PPh Pasal 21) is one of the most vital state revenue instruments in Indonesia, holding a strategic role in supporting national development financing. Based on Law Number 7 of 1983 concerning Income Tax, as amended several times, most recently by Law Number 7 of 2021 concerning the Harmonization of Tax Regulations (UU HPP), Article 21 Income Tax is withheld on income received by domestic individual taxpayers in connection with work, services, or activities (Turnip & Siregar, 2023). In practice, the government appoints employers as withholding agents who are obligated to calculate, withhold, remit, and report Article 21 Income Tax on salaries and other compensation paid to employees (Pranata & Kusnadi, 2023).

Prior to the commencement of regulatory reform in early 2024, the mechanism for withholding Article 21 Income Tax for permanent employees was guided by the Regulation of the Director General of Taxes Number PER-16/PJ/2016. This old method required tax withholders to perform a fairly complex, multi-tiered calculation every month. The process included determining gross income, deducting occupational expenses of 5% (capped at IDR 500,000 per month) and pension or old-age security (JHT) contributions, subtracting the annualized Non-Taxable Income (PTKP), applying the progressive rates under Article 17 paragraph (1) letter a of the Income Tax Law, and dividing the result by 12. The complexity of this scheme not only consumed company payroll staff time but also carried a high potential for calculation errors (human error) and misunderstanding among workers regarding how their tax burdens were annualized and withheld monthly (Lisdiana & Wijaya, 2024).

To address tax administrative efficiency challenges and provide legal certainty, the government issued Government Regulation (PP) Number 58 of 2023, followed by technical guidelines in Minister of Finance Regulation (PMK) Number 168 of 2023. Effective January 1, 2024, this new regulation introduced the Average Effective Rate (TER) scheme. The TER policy divides monthly withholding rates for permanent employees into three main categories (TER A, TER B, and TER C) structured around PTKP status. Under this TER scheme, Article 21 Income Tax for tax periods January through November is calculated very simply: by directly multiplying the TER percentage by the total Monthly Gross Income, without deducting monthly occupational expenses or PTKP (Andjeliartini & Setyadi, 2024). Meanwhile, in the final tax period (December), tax withholding reverts to an annual calculation based on Article 17 UU HPP progressive rates, where the total annual Article 21 tax liability is reduced by the total tax already withheld from January through November.

Although the TER scheme was designed to simplify administrative formulas, its field implementation encountered various operational dynamics, as seen at PT XYZ. PT XYZ is an agricultural processing company in Madiun, East Java, employing 113 permanent workers. Operationally, PT XYZ experienced delays in implementing the TER policy compared to the national timeline, with full adjustment to the new system realized only in the 2025 academic/fiscal year. This delay was influenced by internal software adjustment constraints and tax human resource readiness within the firm.

In addition to technical transition issues, PT XYZ's compensation structure which includes irregular income components such as overtime pay, production incentives, annual bonuses, and Religious Holiday Allowances (THR) created new complications. When employees received these irregular compensations, their total Monthly Gross Income spiked significantly. Because the TER scheme uses gross bracket tables, these income surges automatically pushed employees into much higher TER percentage brackets. This led to sharp monthly tax withholding fluctuations and accumulated overpayments in December during the Article 17 recalculation. Furthermore, these drastic fluctuations caused confusion and negative perceptions among workers, who felt their net take-home pay was unfairly reduced during periods of high work productivity (Lauwrence et al., 2024)

The urgency of this research lies in comprehensively evaluating how the TER policy transition impacts both technical-operational aspects of the firm and financial-psychological aspects of employees. Previous studies by Apriyanto & Purwantini, (2024) and Aqilla et al., (2025) primarily highlighted TER's success regarding bureaucratic efficiency, but few examined rate fluctuation phenomena caused by irregular incentives in manufacturing/agribusiness settings or its impact on workforce perception. Therefore, this study aims to: 1) Analyze comparative differences in Article 21 tax calculations before and after TER at PT XYZ. 2) Identify key drivers behind TER implementation delays at PT XYZ. 3) Analyze the impact of TER implementation on final tax liabilities and potential over/under-payment margins and 4) Analyze employee perceptions regarding this new regulation.

B. METHOD

This study uses a descriptive qualitative method with a case study approach. According to Creswell & Creswell (2023), qualitative case studies explore bounded systems in-depth through extensive data collection involving context-rich information sources. This approach allows the researchers to thoroughly describe the operational dynamics of the Article 21 TER scheme at PT XYZ, covering administrative processes, calculation metrics, and subjective employee perceptions (Sugiyono, 2023).

The research took place at PT XYZ in Madiun, East Java, spanning five months from March to July 2026. The study object encompasses Article 21 Tax withholding mechanisms for PT XYZ's 113 permanent employees, consisting of 13 Managerial Employees and 100 Operational Employees across various units (Administration & Finance, Field/Plantation, Engineering, Processing, and Quality Control). Primary and secondary data were utilized. Primary data were gathered through in-depth interviews with key informants specifically HR/Payroll Staff and 6 permanent employees selected via purposive sampling to represent diverse TER Categories (A, B, C) and compensation variations. Secondary data were obtained from internal documents, including payroll sheets, Article 21 tax withholding forms (Form

1721-A1 / 1721-VIII), organizational charts, and relevant tax regulations (UU HPP, PP No. 58/2023, PMK No. 168/2023, and PER-16/PJ/2016).

Data collection involved three main techniques:

1. Observation: Direct observation of payroll processing workflows, tax data entry, and pay slip issuance within PT XYZ's HR department.
2. Interviews: Structured, in-depth discussions with HR/Payroll staff regarding regulatory transition hurdles, alongside semi-structured interviews with employee samples to capture perceptions of tax changes.
3. Documentation: Collecting, reviewing, and auditing historical payroll and tax withholding files from 2024 and 2025.

Data analysis followed the interactive model by Miles, Huberman, and Saldana (2014):

1. Data Reduction: Selecting, simplifying, and categorizing raw interview transcripts and salary records. Employee payroll calculations were simulated and grouped by PTKP status (TK/0, TK/1, K/0, K/1, K/2, K/3) and calculation schemes (Pre-TER vs. Post-TER).
2. Data Display: Presenting information through descriptive narratives, mathematical comparison tables, and flowcharts to clarify monthly withholding differences, irregular income impacts, and year-end reconciliations in December.
3. Conclusion Drawing & Verification: Formulating logical conclusions on financial impacts, implementation delays, and employee perception patterns, verified against tax compliance, administrative efficiency, and attribution theories.

C. RESULTS AND DISCUSSIONS

Calculation Mechanism for Article 21 Income Tax

Based on an analysis of PT XYZ's payroll documentation, prior to the implementation of Government Regulation (PP) No. 58 of 2023, the company employed a conventional formula for monthly Income Tax (PPh) Article 21 withholding, in accordance with Regulation PER-16/PJ/2016. Under this former method, the system calculated Net Income each month by deducting the occupational expense allowance (5%, capped at IDR 500,000/month) and pension/Old-Age Security (JHT) contributions from Gross Income. Subsequently, the Monthly

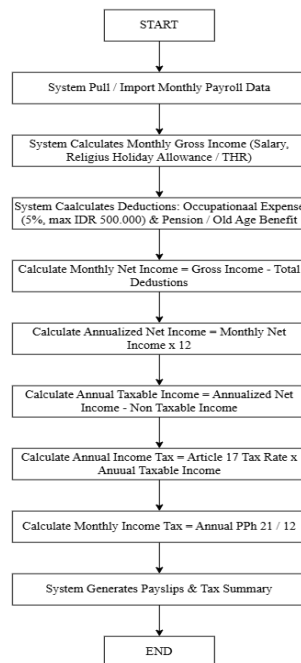
Net Income was annualized (multiplied by 12) and reduced by the annual Non-Taxable Income (PTKP) to derive the Taxable Income (PKP); this figure was then multiplied by the progressive rates stipulated in Article 17 of the Income Tax Law, and finally divided by 12 to determine the PPh 21 liability for the current month.

Following the adjustment to the Effective Tax Rate (TER) scheme based on Minister of Finance Regulation (PMK) No. 168 of 2023, the calculation process for the January–November period became significantly streamlined. The monthly PPh 21 withholding amount is now obtained directly by multiplying Monthly Gross Income by the TER percentage specified in the applicable category table (TER A, TER B, or TER C). It is only during the December tax period that PPh 21 is recalculated using the progressive rate mechanism of Article 17 applied to the total accumulated gross income for the year (less occupational expenses and PTKP) and then reduced by the total PPh 21 already withheld during the January–November period.

Tabel 1. Monthly Average Effective Rate (TER) Categories for Permanent Employees

TER Category	PTKP	Monthly Gross Income Range (IDR)	Effective Rate Range (%)
TER A	TK/0, TK/1, K/0	5.400.000 up to > 1.400.000.000	0.00% – 34.00%
TER B	TK/2, TK/3, K/1, K/2	6.200.000 up to > 1.405.000.000	0.00% – 34.00%
TER C	K/3	6.600.000 up to > 1.419.000.000	0.00% – 34.00%

Source: PMK Number 168 of 2023

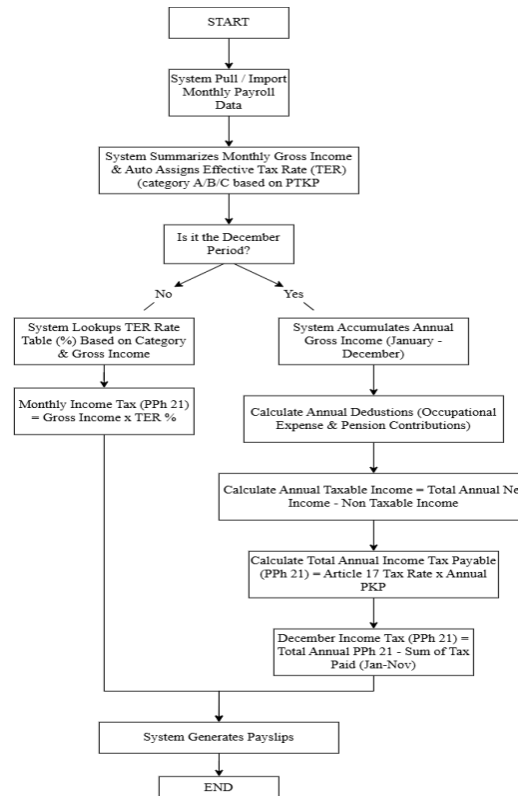


Picture 1. General Flowchart for Article 21 Income Tax Calculation

Based on Picture 1, the general workflow for calculating Article 21 Income Tax prior to the implementation of the TER (Effective Tax Rate) provisions begins with the payroll system importing or retrieving income component data for each monthly tax period (January through December). Once all compensation components are aggregated into Monthly Gross Income, the system automatically calculates deductions: the occupational expense allowance (set at 5%, up to a maximum of IDR 500,000 per month) and employee-borne pension or Old-Age Security (JHT) contributions. These deductions yield the Monthly Net Income, which the system then multiplies by 12 to derive the Annualized Net Income.

In the next stage, the system subtracts the Non-Taxable Income (PTKP) determined by the employee's marital status and number of dependents from the Annualized Net Income to arrive at the Annual Taxable Income (PKP). This PKP figure is then applied to the progressive tax rates stipulated in Article 17 of the Income Tax Law to calculate the total accumulated Article 21 Income Tax payable for the year. Finally, this annual tax liability is divided by 12 to

determine the monthly Article 21 Income Tax amount, which is directly deducted from the employee's payslip. The system consistently executes this complex process every month.



Picture 2. Flowchart for Calculating Article 21 Income Tax Applying TER

Based on Picture 2, the payroll system's computation workflow following the implementation of TER regulations begins with retrieving monthly salary data and automatically determining the TER Category (A, B, or C) from the master employee database based on the employee's Non-Taxable Income (PTKP) status. Once the Monthly Gross Income is compiled, the system executes a decision point based on the tax period:

1. **Monthly Tax Period Workflow (January–November):** If the payroll period falls between January and November, the system does not calculate occupational expenses or PTKP on a monthly basis. Instead, it immediately performs a data lookup on the TER table using the assigned Category (A/B/C) and the monthly gross amount to identify the effective rate (%). The Monthly Income Tax (PPh) Article 21 amount is derived by directly multiplying

the Monthly Gross Income by the TER percentage. This process streamlines the system's computational steps during the first 11 months.

2. Final Tax Period Workflow (December): When the payroll period reaches December, the system performs a reconciliation process. It aggregates all Gross Income from January through December, deducts the total annual occupational expenses and pension contributions, and subtracts the PTKP to determine the Annual Taxable Income (PKP). This PKP figure is then multiplied by the rates stipulated in Article 17 of the HPP Law to calculate the Total Annual PPh Article 21 Liability. The PPh 21 deduction amount for December is determined by calculating the difference between the Total Annual PPh 21 Liability and the aggregate PPh 21 already withheld from January through November.

Analysis of Differences in Article 21 Income Tax Before and After the Implementation of TER at PT XYZ

The following table illustrates the fundamental differences in the calculation scheme for Article 21 Income Tax (PPh Pasal 21) for Permanent Employees:

Tabel 2. Differences in Article 21 Income Tax (PPh 21) Before and After the Implementation of TER

Comparison Parameter	Before TER Implementation (PMK 252/PMK.03/2008)	After TER Implementation (PMK 168 Year 2023)
Main Legal Basis	PMK No. 252/PMK.03/2008 & PER-16/PJ/2016	Government Regulation (PP) No. 58 Year 2023 & PMK No. 168 Year 2023
Monthly Period Approach (Jan–Nov)	Proportional/Annualization Method: Monthly net income was annualized, deducted by PTKP, calculated using Article 17 Rates, then divided by 12.	Average Effective Rate (TER) Method: Monthly gross income is directly multiplied by the appropriate monthly TER percentage.
Monthly Deductible	Calculated and deducted every month (Occupational	Not calculated during monthly periods (Jan–Nov). All deductible components

Comparison Parameter	Before Implementation (PMK 252/PMK.03/2008)	TER (PMK 168 Year 2023)
Components (Occupational Expense & Contributions)	expense max. IDR 500,000/month).	are calculated all at once in December / Final Period.
Monthly PTKP Status Grouping	PTKP was used directly as a deduction in the monthly calculation formula.	PTKP is categorized into 3 Monthly TER Categories: 1. TER A: TK/0, TK/1, K/0 2. TER B: TK/2, TK/3, K/1, K/2 3. TER C: K/3
December / Final Period Calculation Mechanism	Used the same method as previous months (re-annualized).	Calculates total Annual Article 21 Tax Liability using Article 17 Rates under UU HPP, minus accumulated Article 21 tax already withheld in Jan–Nov.
Monthly Deduction Fluctuations with Bonus/THR	Complex calculation; required separating Income Tax on regular income and irregular income.	Very simple; Bonus/THR is combined with gross salary for that month, then directly multiplied by the TER percentage according to the corresponding tier/bracket.

Factors Causing TER Implementation Delays at PT XYZ

Interviews and observations revealed two primary factors contributing to the delay in implementing the TER (Effective Tax Rate) system at PT XYZ. First was the lack of readiness regarding payroll systems and technology; the internal payroll software still relied on conventional formulas and had not been modified to incorporate the matching algorithms for Categories A, B, and C, causing the migration process to be hindered by the time required for coding, testing, and troubleshooting. This situation aligns with Compliance Theory (Nuryati,

2022), which emphasizes that tax compliance relies heavily on the reliability of information systems that support proper practices. Second was the lack of available time and the heavy workload faced by HR staff; the payroll team had to prioritize the smooth operation of routine salary payments, causing the agenda to update the Article 21 Income Tax (PPh 21) withholding system to be postponed until a window of opportunity arose amidst their busy schedules a finding consistent with (Turnip & Siregar, 2023), who noted that weaknesses in operational tax processing are often triggered by the intensity of routine financial activities.

Employee Perceptions of TER Implementation

During regular tax periods, employee Income Tax (PPh) Article 21 deductions tend to remain stable, however, deductions increase significantly during bonus and holiday allowance (THR) payouts, demonstrating that the TER scheme remains sensitive to income levels despite being designed primarily for administrative streamlining (Nuraini, 2024). Interview results reveal a duality of perception that can be explained through Fritz Heider's Attribution Theory (Tarumingkeng, 2025): HR staff tend to form positive attributions due to tangible gains in work efficiency specifically, payroll processing time was reduced from two or three days to a single workday. Conversely, employees focus more on the direct impact on their personal financial stability; while they appreciate the transparency of payslips and the predictability of deductions during regular months, they experience anxiety when take-home pay drops drastically due to the rates applied during incentive months. These findings align with (Hanifah & Hayati, 2024) regarding post-TER payroll administrative efficiency, while also reinforcing observations by Aryani & Romanda, (2024) and Lisdiana & Wijaya, (2024) that low employee tax literacy can trigger biased perceptions of fairness regarding deductions that are, in fact, a standard part of the TER mechanism.

D. CONCLUSIONS

Based on the research findings and discussion regarding the "Analysis of the Application of the Average Effective Rate (TER) to the Calculation of Article 21 Income Tax (PPh) for Permanent Employees at PT XYZ," the main conclusions drawn from this study are as follows:

1. The application of the Average Effective Rate (TER) at PT XYZ complies with the provisions of Government Regulation (PP) Number 58 of 2023 and Minister of Finance Regulation (PMK) Number 168 of 2023, thereby simplifying the calculation process for Article 21 Income Tax compared to the previous method.
2. The delay in implementing the Average Effective Rate (TER) at PT XYZ was caused by the company's payroll system not being ready to adjust its calculation mechanism to the latest regulations. Furthermore, the implementation process was influenced by the need for internal administrative adjustments and the requirement to improve human resource understanding regarding the provisions of PP Number 58 of 2023 and PMK Number 168 of 2023. These conditions meant the company required time to adapt, preventing the TER application from functioning optimally during the initial implementation phase.
3. Irregular income such as bonuses, the Religious Holiday Allowance (THR), and overtime pay causes shifts in the Average Effective Rate (TER) tier applied to employees. These changes in rate tiers result in greater monthly fluctuation in Article 21 Income Tax deductions, as the rate is adjusted based on the gross income received during the relevant tax period.
4. The application of the TER scheme has elicited mixed reactions among PT XYZ's permanent employees. On one hand, employees appreciate the clarity and ease of verifying tax deduction calculations on their monthly payslips. On the other hand, there is unease and concern regarding the sudden drop in net income (take-home pay) during months when incentives, THR, or overtime pay are received, caused by the spike in the TER rate tier.

E. SUGGESTIONS

PT XYZ is advised to expedite the upgrading of its payroll system to accurately accommodate TER calculation logic from the onset of the regulatory transition period, and to formulate a dedicated timeline well in advance of future tax regulation updates to mitigate the

risk of non-compliance due to delays. The company also needs to re-evaluate the disbursement schedules for irregular income components (such as bonuses, overtime pay, and holiday allowances) and provide transparent communication and education to employees regarding the TER rate tier mechanism and annual reconciliation processes, thereby preventing misunderstandings arising from fluctuations in monthly deductions. For future researchers—given that the scope of this study was limited to permanent office-based employees at PT XYZ during a single tax period—it is recommended to expand the scope of research to include more complex scenarios at other companies, such as cases involving mid-year employee resignations or different business sectors.

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