

**Analysis of Income Tax Article 21 Implementation on
Overseas Living Allowance of Government Officials: A Case
Study of Indonesian Trade Promotion Centre Work Units**

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ABSTRACT

This study analyzes the effect of Non-Taxable Income (PTKP), Civil Servant Grade, and the Overseas Living Allowance (TPLN) in the accreditation country on the amount of Income Tax Article 21 (PPh Article 21) withheld from the salaries of State Civil Apparatus (ASN) assigned to Indonesian Trade Promotion Centre (ITPC) work units. A quantitative approach with a causal-comparative research design was employed. Secondary data were collected from personnel and tax administrative records of 38 ASN — comprising the Head and Deputy Head of ITPC — from 19 work units located across various countries. Multiple linear regression analysis was conducted using SPSS version 25. Results indicate that simultaneously, PTKP, Civil Servant Grade, and Country TPLN significantly influence PPh Article 21 ($F = 4,971.913$; $\text{Sig.} = 0.000$; Adjusted $R^2 = 0.998$). Partially, only Country TPLN shows a positive and highly significant effect ($t = 109.349$; $\text{Sig.} = 0.000$; $\beta = 1.005$), while PTKP ($\text{Sig.} = 0.746$) and Civil Servant Grade ($\text{Sig.} = 0.070$) are not significant individually. The application of the Average Effective Rate (TER) method under Government Regulation No. 58 of 2023 demonstrates a highly accurate withholding model. These findings contribute to the literature on overseas civil servant taxation and provide actionable policy recommendations for the Ministry of Trade and Ministry of Finance.

Keywords: Income Tax Article 21, Overseas Living Allowance, Average Effective Rate, Non-Taxable Income, Civil Servant Grade, ITPC

INTRODUCTION

Income Tax Article 21 (PPh Article 21) constitutes one of the most significant instruments of state revenue in Indonesia's fiscal structure. Based on Article 21(1) of Law No. 36 of 2008 on Income Tax, PPh Article 21 encompasses withholding taxes on salaries, wages, honoraria, allowances, and other forms of compensation received by resident individual taxpayers in connection with employment, services, or activities (Arifin & Sitabuana, 2022). The accuracy and consistency of PPh Article 21 withholding carries implications not only for state revenue optimization, but also for the financial welfare of State Civil Apparatus (ASN) — particularly those serving overseas.

The Indonesian Trade Promotion Centre (ITPC) is a technical implementation unit under the Ministry of Trade of the Republic of Indonesia. Established under Ministry of Trade Regulation No. 13 of 2021, ITPC is mandated to promote Indonesian export products, conduct market intelligence, and facilitate trade in foreign markets (Ministry of Trade, 2022). Currently, 19 ITPC work units are stationed across key cities worldwide, each staffed by a Head of ITPC and a Deputy Head. These personnel

receive an Overseas Living Allowance (TPLN — *Tunjangan Penghidupan Luar Negeri*) as compensation for the elevated cost of living abroad, as regulated by Presidential Regulation No. 84 of 2024 amending Presidential Regulation No. 65 of 2019.

The TPLN calculation integrates multiple components: (1) an Additional Living Cost (ADTLN) reflecting local cost-of-living indices, (2) a Multiplication Factor (AP) calibrated to employee rank/grade, (3) family dependent allowances, and (4) a foreign exchange conversion rate (USD to IDR) using the weekly tax rate set by the Minister of Finance. The multidimensional nature of this calculation distinguishes overseas tax withholding from domestic payroll taxation and underscores the complexity confronting ITPC financial administrators.

In the context of national tax reform, Government Regulation No. 58 of 2023 introduced the Average Effective Rate (TER) method as the new mechanism for monthly PPh Article 21 withholding. TER assigns a fixed average monthly tax rate based on each taxpayer's PTKP category (Category A, B, or C), effectively simplifying monthly calculations while retaining the annual progressive tax structure of Article 17 of the Income Tax Law during the December reconciliation (Wasesa et al., 2024). Despite its administrative advantages, studies have identified implementation challenges, particularly regarding accuracy in months involving irregular income components such as holiday bonuses (THR) and the 13th salary (Swastika & Suprianto, 2025; Astuti & Noor Ardiansah, 2024).

Existing literature on PPh Article 21 predominantly focuses on domestic ASN or private-sector employees. Empirical analysis of PPh Article 21 on TPLN within overseas work units such as ITPC remains scarce. This study addresses this gap by empirically testing the influence of PTKP, Civil Servant Grade, and Country TPLN on PPh Article 21 withholding, under the framework of TER implementation. The research questions are: (1) What is the mechanism of PPh Article 21 withholding on TPLN in ITPC work units? (2) Do PTKP, Civil Servant Grade, and Country TPLN jointly influence PPh Article 21? (3) Does each variable individually influence PPh Article 21?

LITERATURE REVIEW AND HYPOTHESIS DEVELOPMENT

Contemporary Tax Theory

Adam Smith's four canons of taxation — equity, certainty, convenience, and efficiency — remain foundational to modern tax policy, including Indonesia's (Waluyo, 2021). The TER mechanism under PP No. 58 of 2023 embodies the principle of simplicity (*simplicity*), enabling payroll officers to apply a pre-determined monthly rate without performing progressive simulations (Harjito & Martono, 2021). From a behavioral standpoint, simplification reduces taxpayer compliance costs and bolsters voluntary compliance, a phenomenon confirmed by Randhu & Edy (2025) in their study of ASN tax compliance under TER.

Agency Theory in the Context of ASN Taxation

Agency theory (Jensen & Meckling, 1976) posits a contractual principal-agent relationship in which the principal (government) provides compensation and the agent (ASN) undertakes public duties. The withholding tax mechanism of PPh Article 21 serves as a governance control that mitigates agency conflict by ensuring tax obligations are discharged prior to the agent receiving income (Harjito & Martono, 2021). In the ITPC context, the financial officer (*bendahara*) functions as a fiduciary intermediary, making the accuracy of TPLN-based tax computation a matter of both institutional integrity and legal compliance (Randhu & Edy, 2025).

Overseas Living Allowance (TPLN)

TPLN is a monthly allowance provided to ASN, military personnel, and national police officers serving at Indonesian overseas representations, pursuant to Presidential Regulation No. 84 of 2024. Its calculation formula is:

$$\text{TPLN} = (\text{ADTLN} \times \text{AP}) + (\text{Dependents} \times \%)$$

converted to IDR using the weekly tax rate issued by the Ministry of Finance. The ADTLN coefficient is periodically adjusted to reflect inflation and cost-of-living changes in the accreditation country. Article 5(1) of Presidential Regulation No. 84 of 2024 mandates that TPLN amounts be determined based on the cost-of-living index of the respective country, creating significant cross-national variation (Randhu & Edy, 2025).

Average Effective Rate (TER)

TER is the PPh Article 21 monthly withholding mechanism under Government Regulation No. 58 of 2023, operationalized through Minister of Finance Regulation No. 168/PMK.03/2023. TER categorizes taxpayers into three PTKP-based categories (A, B, C) and applies a corresponding monthly rate from January to November. December uses the progressive Article 17 rate for annual reconciliation (Salsabila et al., 2024; Nurul Ain et al., 2024). While TER preserves the annual tax burden equivalence, Astuti & Noor Ardiansah (2024) documented a potential Rp35.3 million over-withholding in months with bonus income when TER rates spike 3–4.5 times above the normal rate. Hutabarat et al. (2025) further noted negative cash flow implications for institutions that experience systematic over-withholding under TER.

Non-Taxable Income (PTKP)

PTKP deducts a fixed annual allowance from gross income before calculating taxable income, thereby reducing PPh Article 21. Its amount is determined by marital status and the number of dependents under Law No. 7 of 2021. PTKP embodies the principle of vertical equity by adjusting tax obligations to each taxpayer's economic capacity (Waluyo, 2021). Under TER, PTKP determines the applicable tax category rather than directly reducing monthly withholding amounts (Salsabila et al., 2024).

Civil Servant Grade

Civil servant grade determines the Multiplication Factor (AP) in the TPLN formula and the base salary. Higher grades yield higher AP values, resulting in larger TPLN and, consequently, a larger taxable gross income and PPh Article 21 (Priyono, 2023). Yuliani (2024) demonstrated that grade differences among overseas-assigned ASN significantly affect their financial welfare, which correlates with work motivation and organizational productivity.

Research Framework and Hypotheses

Based on the theoretical framework and prior research:

- **H1:** Non-Taxable Income (PTKP) has a negative effect on PPh Article 21.
- **H2:** Civil Servant Grade has a positive effect on PPh Article 21.
- **H3:** Country TPLN has a positive effect on PPh Article 21.
- **H4:** PTKP, Civil Servant Grade, and Country TPLN jointly have a significant effect on PPh Article 21.

RESEARCH METHOD

Research Design

This study employs a quantitative approach with a causal-comparative research design to test cause-and-effect relationships between the independent variables (PTKP, Civil Servant Grade, Country TPLN) and the dependent variable (PPh Article 21). This design is appropriate for research aimed at producing empirically measurable findings for fiscal policy evaluation (Sugiyono, 2022).

Population and Sample

The research population comprises all ITPC employees — specifically Heads of ITPC and Deputy Heads of ITPC — across all active work units worldwide. Using purposive total sampling (census technique for populations below 100), a total of 38 ASN from 19 ITPC work units constituted the sample. Secondary data were obtained from official personnel and tax administration documents, including monthly TPLN reports, employee appointment decrees, and withholding tax records.

Variable Operationalization

Variable	Type	Operational Definition	Scale
PPh Article 21 (Y)	Dependent	Monthly PPh Article 21 withheld from TPLN, calculated using TER under PP No. 58/2023 (IDR)	Ratio
PTKP (X1)	Independent	Annual PTKP based on marital status and number of dependents under Law No. 7/2021 (IDR)	Ratio

Civil Servant Grade (X2)	Independent	Numerical code of civil rank from SK Jabatan (III/a = 1 to IV/e = 13)	Ratio
Country TPLN (X3)	Independent	Monthly TPLN after USD-to-IDR conversion using Ministry of Finance tax rate (IDR)	Ratio

Analytical Model

The multiple linear regression model is:

$$Y = \alpha + \beta_1 X_1 + \beta_2 X_2 + \beta_3 X_3 + e$$

where Y = PPh Article 21, α = constant, β = regression coefficients, X1 = PTKP, X2 = Civil Servant Grade, X3 = Country TPLN, and e = error term.

Analysis includes: (1) Classical Assumption Tests (normality, multicollinearity, heteroscedasticity, autocorrelation); (2) Descriptive Statistics; (3) F-test (simultaneous); (4) t-test (partial); and (5) Adjusted R².

RESULTS AND DISCUSSION

Descriptive Statistics

Table 4.1 Descriptive Statistics

Variable	N	Min (IDR)	Max (IDR)	Mean (IDR)	Std. Dev. (IDR)
PPh Article 21 (Y)	38	15,978,218	51,041,975	30,397,948	8,316,424
PTKP (X1)	38	54,000,000	72,000,000	63,947,368	5,936,640
Civil Servant Grade (X2)	38	3	11	7.32	2.53
Country TPLN (X3)	38	69,146,616	162,606,074	116,050,901	22,816,986

Source: SPSS Output, 2026

The mean PPh Article 21 of IDR 30.4 million per month reflects a substantial tax burden on ITPC personnel. Country TPLN demonstrates the widest dispersion (min IDR 69.1M — max IDR 162.6M), reflecting substantial cross-country cost-of-living differences. The narrow PTKP range (IDR 54–72M) relative to TPLN variability already hints at the limited partial influence of PTKP within this sample.

Classical Assumption Test Results

All classical assumption tests were satisfied: (1) **Normality** — histogram and P-Plot confirm approximately normal residual distribution; (2) **Multicollinearity** —

VIF values for all variables are below 10, indicating no severe multicollinearity; (3) **Heteroscedasticity** — scatterplot shows randomly scattered residuals with no discernible pattern; (4) **Autocorrelation** — Durbin-Watson value falls within the no-autocorrelation region. Fulfillment of all conditions confirms that the OLS estimators are BLUE (*Best Linear Unbiased Estimators*) in accordance with the Gauss-Markov theorem (Gujarati & Porter, 2022).

Multiple Linear Regression Analysis

Table 4.2 Multiple Linear Regression Results

Variable	Unstandardized B	Std. Error	Standardized Beta	t-statistic	Sig.
Constant	-4,182,947.824	961,693.297	—	-4.349	0.000
PTKP (X1)	-0.003	0.009	-0.003	0.326	0.746
Civil Servant Grade (X2)	-0.430	0.230	-0.016	-1.868	0.070
Country TPLN (X3)	0.301	0.003	1.005	109.349	0.000

Source: SPSS Output, 2026

The resulting regression equation is:

$$\hat{Y} = -4,182,947.824 - 0.003X_1 - 0.430X_2 + 0.301X_3$$

The Country TPLN coefficient (0.301) indicates that every IDR 1,000 increase in TPLN raises PPh Article 21 by IDR 301, *ceteris paribus*. The negative PTKP coefficient (−0.003) is directionally consistent with theory. The negative Civil Servant Grade coefficient (−0.430) reflects that at higher grades, the ratio of base salary to total TPLN becomes relatively smaller, reducing the base salary component's tax contribution.

F-Test (Simultaneous)

Table 4.3 F-Test Results (ANOVA)

Model	F-statistic	F-table	Sig.	Adjusted R ²
Regression	4,971.913	2.883	0.000	0.998

Source: SPSS Output, 2026

F-statistic (4,971.913) far exceeds F-table (2.883) with Sig. = 0.000 < 0.05, supporting H4. All three variables jointly explain 99.8% of PPh Article 21 variation, demonstrating exceptional predictive power. This level of explanatory strength reflects the mechanistic and formulaic nature of tax calculation where the three variables are mathematically embedded in the TER computation process.

t-Test (Partial)

Table 4.4 t-Test Results

Variable	t-statistic	t-table	Sig.	Hypothesis Decision
PTKP (X1)	0.326	2.032	0.746	H1 rejected (not significant)
Civil Servant Grade (X2)	-1.868	2.032	0.070	H2 rejected (marginal, not significant)
Country TPLN (X3)	109.349	2.032	0.000	H3 accepted (positive, highly significant)

Source: SPSS Output, 2026

Discussion

Simultaneous Influence. The F-test confirms that PTKP, Civil Servant Grade, and Country TPLN collectively constitute highly significant predictors of PPh Article 21 (Adjusted $R^2 = 99.8\%$). This result is consistent with the PER-16/PJ/2016 computational framework, where PPh Article 21 is a simultaneous function of gross income (including TPLN), PTKP reduction, and grade-correlated rate schedules. Nurul Ain et al. (2024) confirmed that gross income and PTKP jointly determine PPh Article 21 under PP No. 58/2023, which aligns with the findings of this study. Salsabila et al. (2024) add that TER's three-category structure (A/B/C) integrates PTKP, income, and employment status simultaneously, reinforcing the joint significance finding.

Partial Effect of Country TPLN. Country TPLN is the sole significantly significant partial predictor ($t = 109.349$; Sig. = 0.000; $\beta = 1.005$), confirming H3. This is consistent with PMK No. 262/PMK.03/2010, which classifies TPLN as an object of PPh Article 21, and with Priyono (2023), who found that the accreditation country positively affects the magnitude of overseas living allowances. Yuliani (2024) corroborated this by documenting that country-specific compensation adjustments significantly impact ASN financial welfare and, by extension, their tax obligations. The standardized beta of 1.005 establishes Country TPLN as the model's dominant predictor, absorbing the explanatory power of the other variables.

Partial Effect of PTKP. PTKP does not significantly influence PPh Article 21 partially (Sig. = 0.746). Although the negative coefficient direction (-0.003) aligns with Waluyo's (2021) theoretical expectation, the effect is statistically immaterial. The narrow PTKP variation range (IDR 54–72M) relative to the TPLN range (IDR 69–

163M) means that PTKP differences between individuals are insufficient to materially alter their PPh Article 21 amounts when TPLN dominates the taxable income base. Salsabila et al. (2024) explain that under TER, PTKP operates through the category determination channel rather than a direct monthly deduction, further dampening its detectable partial effect. This finding carries important policy implications: adjustments to PTKP levels by the government may not meaningfully reduce tax burdens for overseas ASN unless accompanied by structural changes to TPLN formulas or tax rates.

Partial Effect of Civil Servant Grade. Civil Servant Grade yields a marginal non-significant result (Sig. = 0.070). The proximity to the critical 0.05 threshold suggests a latent influence that would likely materialize with a larger and more diverse sample. The non-significance stems from the structural limitation of the ITPC sample: with only two job classifications (Head and Deputy Head) spanning grades III/c to IV/b, the variation in AP values between the two positions is insufficient to generate statistically detectable TPLN — and thus PPh Article 21 — differences. This contrasts with Swastika & Suprianto (2025), who documented significant grade effects in their study of BPKAD Bojonegoro, where a wider spectrum of civil ranks was present. Priyono (2023) and Yuliani (2024) likewise identified positive grade effects on overseas compensation, suggesting the civil servant grade influence is real but operates indirectly through the TPLN channel — an effect that becomes statistically absorbed by the Country TPLN variable's dominance in the joint model.

Effectiveness of TER Implementation. The remarkably high Adjusted R^2 (99.8%) serves as empirical evidence that TER is being applied consistently and accurately within the ITPC work units. This supports Wasesa et al. (2024), who concluded that TER simplifies tax administration without altering the annual tax burden, and Randhu & Edy (2025), who found TER increases efficiency and transparency in ASN PPh Article 21 computation. However, consistent with Astuti & Noor Ardiansah (2024), the ITPC context presents a specific risk: TPLN fluctuates weekly due to exchange rate changes, potentially creating TER rate distortions in months where the cumulative gross income diverges significantly from the prior month's base — similar to the irregular-income risk documented for THR and bonuses. Hutabarat et al. (2025) further note that institutions subject to systematic TER over-withholding face negative cash flow impacts, which is particularly relevant for ITPC given that TPLN is disbursed in USD and converted at a rate that may differ materially from the prior period.

CONCLUSION

Three principal conclusions emerge from this study:

1. **Simultaneously**, PTKP, Civil Servant Grade, and Country TPLN significantly and collectively influence PPh Article 21 for ITPC ASN ($F = 4,971.913$; Sig. = 0.000; Adjusted $R^2 = 0.998$), demonstrating exceptional collective predictive power under the TER framework.

2. **Partially**, only Country TPLN is a statistically significant predictor ($t = 109.349$; $\text{Sig.} = 0.000$; $\beta = 1.005$), making it the dominant determinant of PPh Article 21. PTKP ($\text{Sig.} = 0.746$) and Civil Servant Grade ($\text{Sig.} = 0.070$) do not reach significance individually, due primarily to TPLN's dominance and the limited grade variation within the sample.
3. **TER implementation** under PP No. 58 of 2023 achieves high accuracy in the ITPC context ($R^2 = 99.8\%$), though latent risks in months with irregular income components and exchange rate volatility warrant ongoing administrative vigilance.

Recommendations

For the Ministry of Trade and ITPC Financial Managers:

- Develop an automated PPh Article 21 TER calculation module integrated with the SAKTI financial system, incorporating automated weekly tax rate updates and ADTLN table synchronization.
- Establish a comprehensive Standard Operating Procedure (SOP) for PPh Article 21 withholding on TPLN as a binding reference for financial administrators across all overseas trade representative work units.

For the Ministry of Finance:

- Evaluate the adequacy of PTKP levels for ASN stationed in high cost-of-living cities to ensure vertical equity.
- Issue detailed technical guidelines for TER application in mixed-currency income scenarios (IDR and foreign currency), specifically addressing holiday bonuses (THR) and the 13th salary.

For Future Research:

- Expand the population to include other overseas representative work units (Trade Attachés, Consulates General, Embassies) to capture broader grade variation.
- Introduce the foreign exchange rate as a moderating variable to capture its interaction with TPLN in predicting PPh Article 21.
- Conduct longitudinal research to capture the dynamic effects of exchange rate fluctuations and TER policy changes on PPh Article 21 over time.

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