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Digital Transformation of Land Transaction Income Tax Reporting through the Coretax System

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ABSTRACT

The digital transformation of tax administration through the Coretax System has altered the mechanisms for fulfilling and verifying Income Tax obligations arising from the transfer of land and/or building rights. Although this transformation has strengthened service integration, it has also created functional tension because digital tax validation is a prerequisite for signing a deed, whereas the authentication of deeds by public officials requires certainty regarding the sequence, timing, and presence of the parties. This study analyzes the regulatory framework and legal implications of migrating Income Tax reporting to the Coretax System and reconstructs its implementing norms to ensure legal certainty in the event of system failure. This normative legal study employs statutory and conceptual approaches, supported by a limited sociological approach to contextualize the analysis, and applies qualitative-prescriptive analysis. The findings indicate that procedural misalignment, the absence of a uniform emergency mechanism, and the unclear allocation of responsibility for system disruptions may delay transactions and increase legal risks for taxpayers and Land Deed Officials (PPATs). The study proposes a three-stage model comprising pre-signing compliance, the signing session, and post-signing reconciliation, supported by a digital force majeure clause, an audit trail, and an official escrow account as emergency instruments. By placing tax compliance before the authentication session, the model ensures that digital efficiency does not undermine the authenticity of deeds or the legal protection of the parties.

Keywords: *Coretax System; legal certainty; Income Tax; Land Deed Official; norm reconstruction*

INTRODUCTION

The digital transformation of tax administration in Indonesia entered a new phase when the Core Tax Administration System, or Coretax System, began operating in early 2025. This transformation does not merely transfer forms and services to an electronic medium; it integrates registration, document submission, payment, supervision, and data management into a single system. From a policy perspective, this integration is intended to improve database accuracy, reduce process duplication, enhance transparency, and strengthen risk-based service delivery. Systematic studies by Bassey et al. (2022) and Hesami et al. (2024) demonstrate that the success of digital tax administration depends on the alignment of institutional settings, stakeholders, technology, and measurable outcomes, rather than solely on application adoption. In the Indonesian context, Darmayasa and Hardika (2024) emphasize that the effectiveness of the core tax system is shaped by the balance between authority power and taxpayer trust. Accordingly, the success of digitalization must be assessed by the system's ability to ensure service continuity, high-quality interaction, and certainty regarding the legal consequences of every transaction that depends on it.

One area directly affected is the fulfillment of Income Tax (PPh) obligations arising from the transfer of land and/or building rights. Under Government Regulation No. 34 of 2016, income derived from the transfer of land and/or building rights is generally subject to final Income Tax at a rate of 2.5% of the gross transfer value, unless the transaction falls within a category subject to special treatment. Under the new administrative architecture, payments and formal verification of compliance with this obligation are processed through digital services connected to the Coretax System. Minister of Finance Regulation No. 81 of

2024, as amended, requires payment to be completed before signing a deed, decision, agreement, arrangement, or auction minutes. Article 193(7) – (9) further requires authorized officials, including Land Deed Officials (Pejabat Pembuat Akta Tanah, PPATs), to sign the deed only after evidence of compliance has been submitted and formally verified. Under this framework, the output generated by the digital system is not merely an administrative document; it serves as a gateway to the continuation of legal acts involving land rights.

This interconnection brings together three legal regimes with distinct functions: The tax regime safeguards state revenue and taxpayer compliance; the land regime ensures orderly registration and certainty regarding the data of rights holders and land objects; and the regime governing public officials preserves the formal requirements, authenticity, and evidentiary force of deeds. In practice, a PPAT cannot disregard proof of payment and the results of formal verification because the deed serves as the basis for amending land registration data. Simultaneously, the deed-making process must comply with official procedures that provide certainty regarding the parties' identities, reading of the deed, consent, and execution. Although electronic documents and certificates broaden the available means of proof, they do not automatically eliminate the specific formalities attached to authentic deeds. Permadi and Herlindah (2023) emphasize that the digitalization of land certificates must continue to rest on guarantees of authenticity, integrity, and accountable access so that the pursuit of legal certainty does not become a new source of dispute.

Problems arise when digital tax validation is not completed or when the service is disrupted after the transaction has entered the deed-making stage. The research materials identify obstacles such as failures in one-time password delivery, inconsistencies in taxpayer profiles, problems with electronic certificates, and delays in data synchronization. Official records issued by the Directorate General of Taxes (2025) and the Indonesian Tax Consultants Association (2025) during the initial implementation period also show that technical disruptions are not merely abstract possibilities but operational risks that require their mitigation. Such disruptions may delay the reading and signing of deeds, increase transaction costs, interfere with payment schedules, and create uncertainty regarding who should bear losses when the delay is attributable solely to a government system. From the taxpayer's perspective, this issue concerns the right to accessible and predictable services; from the PPAT's perspective, it concerns the limits of official responsibility when electronic prerequisites lie beyond the official's control.

The research materials initially framed this tension as a conflict between Article 193 of Minister of Finance Regulation No. 81 of 2024 and the phrase "signed immediately at that time" in Article 16(1)(m) of the Law on Notary Offices. This formulation must be read carefully. The Law on the Office of Notary directly governs notarial deeds, whereas PPAT deeds are subject to the legal regime governing PPATs and land registration (PP). Nevertheless, many officials concurrently serve as notaries and PPATs, and both types of deeds are based on the principle that the authentication process must constitute a unified sequence of actions. Therefore, the issue examined is not a simple conflict between two provisions governing an identical object but a functional tension between digital tax prerequisites and the formal requirements governing deeds executed by public officials. This clarification is important to ensure that the proposed norm reconstruction does not extend the Law on the Office of Notary to all PPAT deeds while still addressing the risk of discontinuity between tax validation and the authentication session.

Previous studies have examined digitalization from two perspectives that have not yet been fully integrated into a single framework. In the field of tax administration, Bassey et al. (2022), Bellon et al. (2022), Hesami et al. (2024), and Kotsogiannis et al. (2025) show that digitalization can improve data quality, supervision, and compliance; however, these benefits depend on reliable infrastructure, sound process design, and the system's capacity to generate verifiable outcomes. Uyar et al. (2021) likewise emphasize that the effectiveness of e-government initiatives is influenced by the quality of information and communication technology. In the notarial field, Agustin and Anand (2021), Biemans (2021), Mannas et al. (2024), and Sendrawan et al. (2025) examine the opportunities created by digitalization, the limits imposed by formalities, electronic protocol storage, and the need for legal reform to preserve the integrity of the office. Studies on electronic documents demonstrate that the legal recognition of electronic information must be distinguished from the creation of a new form of authentic deed (Krisna et al., 2026; Simamora et al., 2025). Meanwhile, Permadi and Herlindah (2023) and Widiyono and Khan (2023) identified authenticity, data accuracy, and registration certainty as essential components of land administration transformation.

Collectively, these studies provide a strong foundation, but they have not specifically formulated a normative sequence linking the fulfillment of Income Tax obligations, formal verification through Coretax, deed-signing sessions, emergency mechanisms in the event of system failure, and data reconciliation after the deed is signed.

The research gap lies in the absence of a normative design that clearly separates the tax compliance stage from the authentication stage without severing their integration. If validation occurs during the deed-making session, a system disruption may hold the entire process hostage. Conversely, if the deed is signed without the required evidence, the PPAT risks violating administrative obligations. A further gap is the absence of specific parameters for digital force majeure that distinguish failures of government systems, user negligence, and external disruptions, together with their legal consequences for deadlines, sanctions, transaction continuity, and civil liability. Under these circumstances, legal certainty cannot be achieved solely through prohibitions or obligations; it also requires alternative procedures that are operational, documented, and auditable when the primary channel is unavailable.

The novelty of this study lies in the three-stage model for reconstructing applicable norms: pre-signing compliance, the signing session, and post-signing reconciliation. The model treats verification of the parties, the object, tax calculation, payment, and formal Income Tax verification as prerequisites that must be completed before the reading and signing session begins. During authentication, tax data that have passed validation are locked to the same transaction, so any material change requires renewed verification. After the deed is signed, the deed data are electronically reconciled with the tax and land data. The model is supplemented by a digital force majeure clause, audit trail, proportional allocation of responsibility, and official escrow account as an emergency channel. This reconstruction is not intended to legitimize tax avoidance or reduce the formal requirements governing deeds but to ensure that both obligations can be fulfilled in a consistent sequence.

Against this background, this study addresses two questions. First, how is the migration of Income Tax reporting for land sale and purchase transactions to the Coretax System and its legal implications regulated? Second, how should the norms governing Income Tax reporting for land sale and purchase transactions conducted before a PPAT be reconstructed to ensure legal certainty in the event of a system failure? This study aims to explain the applicable legal architecture, identify points of procedural misalignment and the resulting legal risks, and formulate an implementation model that balances tax compliance, the authenticity of deeds, the protection of the PPAT's office, and the rights of the parties.

RESEARCH METHOD

This study is normative legal research arising from regulatory ambiguity concerning the consequences of digital system failures and procedural misalignment between fulfilling tax obligations and executing deeds transferring land rights. Normative legal research is employed to assess the coherence of legal norms, interpret the relationships among provisions, and formulate prescriptions for such legal reform. The selection of this research type does not alter the design of the research materials. Data on disruptions encountered during Coretax implementation were used as a sociological context for testing the practical operation of the norms, not as a basis for statistical inference. Accordingly, implementation facts are used only to clarify problems of application, while the primary objects of analysis remain the relevant norms, principles, concepts, and legal materials.

This study employs statutory and conceptual approaches, supplemented by a limited sociological approach to strengthen the contextual analysis. The statutory approach examines the relationship between the 1945 Constitution of the Republic of Indonesia, tax legislation, land legislation, regulations governing notaries and PPATs, and legislation on electronic information and transactions. A conceptual approach is used to analyze legal certainty, deed authenticity, policy stages, legal hermeneutics, system interoperability, and risk allocation in digital public services. The sociological approach is applied in a limited manner through the examination of official reports, publications issued by public authorities, and academic studies concerning the initial challenges of Coretax implementation, thereby ensuring that the proposed norm reconstruction remains responsive to practical needs of the field.

Primary legal materials comprise the 1945 Constitution of the Republic of Indonesia; the Law on General Provisions and Tax Procedures and its amendments; the Law on the Office of Notary and its

amendments; the Law on Electronic Information and Transactions and its amendments; the Law on Financial Relations between the Central Government and Regional Governments; Government Regulation No. 24 of 1997, as adjusted by Government Regulation No. 18 of 2021; Government Regulation No. 37 of 1998, as amended by Government Regulation No. 24 of 2016; Government Regulation No. 34 of 2016; and Minister of Finance Regulation No. 81 of 2024 and its amendments. Secondary legal materials include books, journal articles, research findings, official Coretax guidelines, and relevant institutional publications. Recent literature was selected to strengthen the discussion on digital tax administration, cyber notary practices, electronic documents, legal certainty in land affairs, and the protection of users of electronic services.

Legal materials were collected through document studies using inventory, classification, and cross-referencing techniques. Each provision was categorized according to its normative function: norms establishing tax obligations, norms governing the timing of payment and formal verification, norms concerning PPAT authority, norms prescribing deed formalities, and norms governing electronic documentation. The materials were analyzed qualitatively and prescriptively through grammatical, systematic, and teleological interpretations. Legal hermeneutics was used to interpret phrases concerning the temporal unity of signing in light of technological developments while remaining constrained by the hierarchy of legislation and the distinctive legal character of authentic deeds. The findings were then organized into a matrix of problems, risks, and normative requirements to formulate models of pre-signing compliance, the signing session, post-signing reconciliation, digital force majeure, and an official escrow account.

RESULTS AND DISCUSSION

The Regulatory Architecture of Income Tax on Transfers of Rights within the Coretax System

The income Tax on the transfer of land and/or building rights is a substantive obligation arising from the receipt or accrual of income from the transfer. For ordinary sale and purchase transactions, Government Regulation No. 34 of 2016 imposes a final Income Tax at a rate of 2.5% of the gross transfer value. This obligation operates alongside the Duty on the Acquisition of Land and Building Rights (BPHTB), a regional tax imposed on the party acquiring the right under Law No. 1 of 2022. Although both levies arise from the same transaction, their tax bases, taxpayers, competent authorities, and validation mechanisms differ significantly. Accordingly, effective digital integration must enable data exchange without obscuring the division of authority among the central government, regional governments, and ministries responsible for land affairs.

Under Minister of Finance Regulation No. 81 of 2024, Income Tax must be paid before the transfer instrument is signed. This provision establishes a clear legal sequence: the substantive tax obligation is first calculated and paid; evidence of compliance is submitted to the official; formal verification is conducted; and only then may the authorized official sign the deed or transfer document. Article 193(1) primarily imposes a pre-signing payment obligation on the party transferring the right, whereas paragraphs (7) − (9) regulate the obligations of officials and expressly include PPATs among the concerned officials. This systematic reading is important because the responsibilities of the taxpayer and the PPAT must not be conflated. The taxpayer is responsible for the accuracy of the material data and payment, while the PPAT is responsible for ensuring that the required evidence is available and has undergone formal verification before the deed is signed.

The Coretax System functions as the administrative infrastructure through which this sequence was implemented. Through data integration, the system is expected to connect the taxpayer's identity, transferred object, payment code, proof of state revenue, and the results of formal verification within a single workflow. Therefore, Coretax has an instrumental role: it does not create a new taxable object or tax rate but serves as the official channel for performing obligations established by statutes and implementing regulations. This distinction determines the legal consequences of a system disruption. A tax obligation does not automatically disappear merely because the application is inaccessible; however, the state should not attribute negligence to a good-faith taxpayer who is prevented from complying with the failure of official infrastructure. Therefore, bridging norm is required to regulate how the obligation may still be fulfilled or deemed to have been duly pursued through an emergency channel.

Digitalization has also expanded the use of electronic documents as administrative evidence. Proof of payment, receipts, formal verification results, and system logs can be stored and verified electronically,

provided that their integrity and connection to the transaction are guaranteed. In the land context, electronic certificates and electronic data management can support legal certainty when accompanied by adequate mechanisms for authentication, security, and accountability (Permadi & Herlindah, 2023; Widiyono & Khan, 2023). Nevertheless, the recognition of electronic evidence is not equivalent to the elimination of deed formalities. Simamora et al. (2025) show that the validity of electronic transactions continues to depend on a clear identity, authentication, and certainty of the applicable rules. Therefore, the Coretax output must be positioned as administrative evidence that activates the authority to sign rather than as a substitute for the PPAT deed.

Legal certainty in a digital system requires at least four qualities: First, the norms must be ascertainable, including who is required to act and when. Second, the system must generate an output that the PPAT can verify without independently interpreting payment status. Third, system disruptions must be governed by predetermined handling procedures before they arise. Fourth, every action must leave an audit trail that can be used to determine the responsibility. Without these qualities, digitalization merely transfers uncertainty from a physical service counter to an electronic interface. Under Fuller's (1969) account of the internal morality of law, a rule requiring the use of a system must be accompanied by a practical possibility of compliance. When the system constitutes the sole channel but offers no alternative upon failure, a gap arises between normative demands and the capacity to comply.

From a policy-stage perspective, the initial challenges of Coretax implementation demonstrate the importance of the relationship between policy formulation, implementation, and evaluation. Anderson (2003) does not treat evaluation as an entirely separate stage that occurs only after a policy has been completed, but as feedback that should improve policy instruments during implementation. Authentication failures, electronic certificate problems, and profile synchronization errors show that technical evaluation must be promptly translated into adjustments to legal procedures. If the response is limited to application repairs without certainty regarding deadlines, sanctions, or alternative evidence, the service dimension may improve, while users' legal risks remain. Therefore, Coretax upgrades must proceed alongside revisions to implement norms that clarify the status of transactions during periods of disruption.

Legal Implications of Procedural Misalignment for PPATs and the Parties

The first form of misalignment concerns the timing. The parties generally schedule the signing after the civil-law and land-related requirements have been prepared, including identity documents, certificates, the necessary approvals, and payments. When the result of formal Income Tax verification has not yet been issued, the PPAT must postpone the process because tax regulations condition signing on verified evidence. Such postponement may be administratively justified, but it becomes problematic when the cause is not incomplete documentation or taxpayer negligence but the failure of the official system. Without clear service deadlines and escalation mechanisms, parties cannot predict when a transaction may proceed. This temporal uncertainty affects other obligations, including the payment of the purchase price, delivery of the object, validity period of powers of attorney, bank financing, and contractual commitments to third parties.

The second form of misalignment concerns the unity of the authentication process itself. Article 16(1) (m) of the Law on the Office of Notary requires a deed to be read before the appearing parties in the presence of witnesses and signed immediately. This provision directly applies to notarial deeds and is not the only rule governing all PPAT deeds. Nevertheless, the underlying principle remains relevant, where a public official must ensure that the parties' intent, the reading of the deed, consent, and execution form a single accountable sequence. If tax validation begins only after the deed has been read or once the parties have entered the signing session, a system disruption may fragment that sequence. Therefore, the appropriate solution is not to relax formal requirements after a disruption occurs but to move all foreseeable validations to the stage preceding the authentication session.

The third form of misalignment concerns responsibility allocation. A PPAT must exercise due care and refuse to proceed if the prerequisites are not satisfied. However, the duty of care should not be transformed into an unlimited liability for failures beyond the official's control. In a digital service environment, failure may originate from the user's device, Internet connectivity, data supplied by the taxpayer, the electronic identity provider, the collecting bank, inter-agency integration, or the authority's server. Each source requires a different legal consequence. If the PPAT has entered the data correctly, conducted the required examination, and documented the official disruption, imposing damages solely because the transaction was delayed would be inconsistent with fault-based liability. Conversely, official protection cannot be granted

when the delay results from the PPAT's disregard of the procedure, incorrect data entry, or the decision to sign the deed without the required evidence. This source-based allocation of responsibility is consistent with Putra (2020), who argues that in electronic-system transaction failures, the operator's liability must depend on proof that the loss originated from a system under the operator's control.

The risks faced by the parties must also be distinguished. The seller may be deemed late in fulfilling an obligation or may be unable to complete the transaction despite having necessary funds. The buyer may lose certainty regarding the time of acquisition and delivery of a property. In bank-financed transactions, delays may affect disbursement, the validity period of credit approval, and additional costs. These losses cannot always be remedied by waiving tax administrative sanctions because contractual consequences and transaction costs may already have arisen. Therefore, regulations should provide official evidence of the disruption period and the application's status. Such evidence can demonstrate that the delay was not attributable to the parties, provide a basis for adjusting contractual deadlines, and prevent allegations that the PPAT intentionally delayed the service.

From an evidentiary perspective, postponement does not automatically reduce an authentic deed to a private deed because any degradation of evidentiary force depends on breaching legally prescribed formalities. However, if an official attempts to circumvent a disruption by signing at different times, altering the date, or separating actions that should occur within a single session without a legal basis, the risks to validity and evidentiary force increase significantly. The research materials are therefore correct in identifying Coretax disruptions as a threat to certainty concerning the deed; however, the causal relationship must be formulated carefully. The principal threat is not the system error itself but an undocumented procedural response or one that departs from formal requirements because no emergency mechanism is available. Norm reconstruction must prevent officials from being forced to choose between violating tax requirements and undermining the integrity of the authentication process.

The guarantee of fair legal certainty under Article 28D(1) of the 1945 Constitution requires the state to design non-discriminatory and accountable digital services. Equal access does not merely mean that everyone uses the same application; it also requires equal treatment when an application fails. Taxpayers in areas with limited connectivity, users affected by data mismatches, and parties transacting during system maintenance must have access to measurable avenues for redress. This principle is also consistent with developments in electronic transaction law, which emphasizes system reliability, data integrity, and user protection (Rahma et al., 2022). Accordingly, the obligation to use the system must be balanced with the operator's obligation to ensure reliability, provide disruption information, facilitate recovery, and issue alternative evidence.

Table 1 summarizes the relationship between the normative problems, resulting risks, and proposed direction of reconstruction. The matrix demonstrates that increasing the server capacity alone is insufficient. Timing problems require separation of stages; disruption problems require incident status and emergency channels; data problems require interoperability and transaction locking; and responsibility problems require audit trails and risk allocation based on the source of the error.

Table 1. Matrix of Problems, Risks, and Directions for Norm Reconstruction

Problem	Regulatory/Practical Condition	Legal Risk	Direction of Reconstruction
Validation timing	Formal verification is required before the deed is signed, but it is often confirmed only shortly before the deed-making session.	Transaction delays and fragmentation of the authentication process.	All verification is completed at the pre-signing compliance stage within a defined service time frame.
System failure	No uniform emergency procedure with clear legal effect is available for transactions involving transfers of	Taxpayers and PPATs face uncertainty even when the disruption is beyond their control.	Digital force majeure status, official incident evidence, suspension of administrative consequences, and emergency channels.

Problem	Regulatory/Practical Condition	Legal Risk	Direction of Reconstruction
	rights.		
Data synchronization	Tax, land, civil registration, and payment data are not always connected in real time.	Validation rejection, duplicate input, and discrepancies in subject or object data.	Interoperability based on a single transaction identifier, data locking, and post-signing reconciliation.
Responsibility	Risk allocation among taxpayers, PPATs, banks or collecting agents, and system operators remains unclear.	Claims or sanctions may be imposed on a party that did not cause the disruption.	Mandatory audit trails and allocation of responsibility based on the source of error and degree of control.

Contextual Interpretation of the Unity of the Authentication Process

Norm reconstruction requires an interpretation capable of bringing legal texts into dialogue with changes in the technological environment without disregarding authority limits. Gadamer's hermeneutics (1989) regards understanding as an encounter between the horizon of the text and that of the interpreter. In this context, the phrase "immediately at that time" should not be construed narrowly to require every digital administrative examination to occur while the deed is being read. The purpose of the formality is to ensure that the reading, consent, and signing are not separated to such an extent that the parties' intent, identities, and time of execution can no longer be guaranteed. Viewed in light of that purpose, tax validation may be completed before the session begins, while the unity of the authentication session remains strictly preserved.

Contextual interpretation must not be used to conclude that all deeds may be executed remotely, merely because technology enables videoconferencing or electronic signatures. Research on notarial digitalization identifies opportunities for reform but also emphasizes that a change in medium must continue to respect the purposes of formal requirements and the evidentiary function of deeds. Agustin and Anand (2021) propose digitalization while preserving the form and function of the deed; Biemans (2021) demonstrates that physical-presence requirements perform a protective function that cannot be removed solely because communication technology is available; and Mannas et al. (2024) and Sendrawan et al. (2025) emphasize the need for institutional design, authentication, and digital storage to safeguard integrity. These findings support the position that technology should strengthen proof and traceability rather than serve as a basis for eliminating formalities that the legislature has not amended.

The distinction between electronic documents and authentic deeds must be maintained. The Law on Electronic Information and Transactions recognizes electronic information and documents as valid legal evidence, subject to specific exceptions and limitations for documents that the law requires to be made in a particular form. Recognition as evidence addresses whether electronic data may be relied upon in legal proceedings; deed authenticity addresses a different question, namely, whether the document was made by or before an authorized official in compliance with the prescribed form and procedure. In the context of digital wills, Krisna et al. (2026) show that a digital record may have evidentiary value or record a person's intent but does not automatically replace the legally required form of a will. The same analogy applies to the Coretax output: the result of electronic validation may constitute evidence of a prerequisite, but it does not replace the PPAT's authority or the process of executing a PPAT deed.

The authentication session in this study is therefore understood as a single sequence of actions that begins only after all substantive and administrative prerequisites are declared complete. At this stage, the PPAT verifies the parties' presence and legal capacity, reads or explains the contents of the deed as required, confirms their intent, and completes the signing in a traceable sequence. Evidence of Income Tax validation need not be requested again from the beginning, but its status must remain verifiable and linked to the same transaction data. If the price, identity, object, or any other element affecting the tax obligation changes, the

pre-signing compliance status becomes void, and the process must return to the verification stage. This mechanism protects fiscal integrity while preventing the digital system from interrupting a session that should focus on authenticating the parties' intent.

Developments in electronic protocol storage also demonstrate the importance of audit trails and archival data integrity. Mannas et al. (2024) show that digitalization can improve efficiency, security, and access to protocols but requires a clear legal basis and management standards. In land transactions, the same principle can be applied to a compliance evidence package: the application, submitted data, time of submission, payment code, system status, formal verification result, transaction identity, and deed data should be retained in a single sequence. This package does not replace the original deed or deed archive but serves as an administrative attachment demonstrating that the PPAT properly fulfilled the required examination. Such an audit trail is particularly important when disputes arise over the timing of payment, data errors, or the source of disruption.

Accordingly, the proposed adaptive interpretation does not transform the phrase "immediately at that time" into a concept without temporal or spatial limits. Instead, it clarifies the boundaries among the stages: tax verification is completed before authentication; reading and signing are preserved as a single session; and data reconciliation is conducted afterward. This separation constitutes a functional harmonization. The tax law assures that the deed will not be signed before compliance is established, while the law governing deeds assures that administrative disruptions will not intrude upon and fragment the authentication session.

Norm Reconstruction through a Three-Stage Model

The proposed norm reconstruction is based on the premise that the sequence of actions should be designed according to the nature of the risk involved. Tax validation is an administrative process dependent on data exchange and system availability. Deed authentication is a legal process dependent on official authority, presence, intent, reading, and signing. Registration and reporting are reconciliation processes that connect the legal effects of the deed to government databases. Combining all three within a single operational moment means that a disruption to one component can halt the entire transaction. In contrast, separating the stages while linking them through a single transaction identifier allows each stage to have clear entry requirements, outputs, and correction mechanisms.

The model does not alter the taxable object, Income Tax rate, or PPAT's authority. Reconstruction operates at the level of implementing procedures and risk allocation. Ideally, the new norms should be incorporated into a ministerial regulation governing tax administration and harmonized with technical regulations on land affairs and the office of PPAT. The regulation should provide that the formal verification result has a specified validity period, is tied to the material data of the transaction, and can be verified through a code or a single transaction identifier. Therefore, the PPAT would not independently assess the substantive accuracy of the tax but would examine the official status issued by the system. If the material data change, the system should automatically revoke the status and require renewal.

1. **Pre-signing compliance.** This stage begins once the parties have agreed on the material terms of the transaction and submitted relevant data to the PPAT. The PPAT or another authorized party links the seller's identity, the buyer's identity, the object, the transfer value, the basis of acquisition, and supporting documents under a single transaction identifier. The taxpayer calculates and pays the Income Tax through an official channel, after which the system conducts formal verification. The output is a verifiable status stating that the "prerequisites for signing have been satisfied," accompanied by the time of issuance, validity period, and digital fingerprint. This status applies only to locked data. This stage must be completed before the invitation to or commencement of the deed-reading session, allowing any disruption to be addressed without fragmenting the authentication process.
2. **Signing session.** Once the pre-signing compliance status is active, the PPAT begins the deed-making session in accordance with the rules governing the office and land laws. The system conducts only a brief check to confirm that the status remains valid and that no material data have been changed. This check can be performed using a local verification code or a token issued during the previous stage, thereby avoiding the need for intensive reprocessing. The parties then complete the reading, consent, and signing processes in a single sequence. If a material change is identified, the session is terminated before signing, and the transaction returns to the pre-signing stage. In this manner, the deed's formal requirements remain intact, and tax compliance cannot be bypassed.

3. **Post-signing reconciliation.** After the deed is signed, the PPAT submits the transaction-closing data, including the deed number and date, to match the transaction identifier and proof of payment. The system then reconciles the payment status, formal verification results, deed data, and land process. If an emergency escrow account has been used, this stage triggers the transfer of funds to the state treasury and the issuance of the final proof of payment. Reconciliation must not affect the validity of a deed that satisfies the prerequisites, although it may generate an administrative correction notice for non-material discrepancies. Material discrepancies must be addressed through a clear procedure without granting the system the authority to invalidate the deed automatically.

The advantage of the three-stage model lies in the creation of auditable decision-making points. At the pre-signing stage, the legal question is whether the tax obligation and formal verification are fulfilled. During the authentication session, the question is whether the parties and the official have complied with the formal requirements for executing the deed. At the post-signing stage, the question is whether the final data have been matched and whether state revenue has been properly recorded. This separation prevents the use of a single electronic status to resolve every issue. It also facilitates the allocation of responsibility: errors in calculation or material data are attributable to the party supplying the data; errors in deed formalities fall within the official's responsibility according to the scope of authority; and failures of official infrastructure are attributable to the system operator, provided that the user follows the prescribed procedure.

To prevent the model from adding bureaucracy, the once-only submission principle should be applied to it. Identity, object, and value data that have already been entered should not have to be re-entered into the tax system, land system, or PPAT application. Data exchange should occur through a lawful interface that is subject to consent and access restrictions. A single transaction identifier serves as the link, while each institution remains the custodian of the data within its authority. This principle reduces input errors, accelerates the examination, and strengthens consistency. However, interoperability must comply with the principles of personal data protection, information security, data minimization, and access logging. Efficiency must not be achieved by granting every party access to all data without a lawful basis.

The model also requires the establishment of service standards. Implementing regulations should establish an ordinary time frame for formal verification, application-status indicators, escalation mechanisms, and notifications in the event of a disruption. Users must be able to determine whether an application is incomplete, under review, delayed because of the system, or completed. A status that merely states "failed" without providing a reason is insufficient to determine the appropriate legal action. Every rejection must specify a remediable reason, every disruption must generate an incident number, and every data correction must record the change. Such procedural certainty is an integral part of legal certainty because it enables parties to anticipate consequences and select corrective measures rationally.

The reconstruction should also prohibit the use of validation status for another transaction. A digital fingerprint should bind the tax evidence to the seller's identity, buyer's identity, parcel of land, transfer value, and specified period. This locking mechanism prevents duplicate use and reduces the opportunities for manipulation. If the transaction is cancelled before signing, the system must provide a procedure for cancelling the status and resolving the payment in accordance with tax law. Where a non-material change occurs, such as the correction of a spelling error that does not alter identity or value, the correction procedure may be completed without repeating the entire process, provided that a record of the amendment is retained. A distinction between material and non-material changes must be established to ensure that the system remains secure without becoming excessively rigid.

At the institutional level, the Directorate General of Taxes, the ministry responsible for land affairs, regional governments, banks or collecting agents, and the professional organization of PPATs should adopt a joint protocol. The protocol should specify the minimum data structure, status indicators, assistance channels, incident management, and allocation of responsibilities. Cross-sector integration cannot solely rely on technical arrangements between applications; it requires a legal basis for data exchange, security, and official reliance on system outputs. Widiyono and Khan (2023) note that certainty in the acquisition of land rights depends on the consistency of the legal system, rather than on a single document. Therefore, Coretax reconstruction should be situated within the broader ecosystem of certainty for land transactions.

Digital Force Majeure and the Official Escrow Account

The three-stage model still requires a mechanism for disruptions that occur before the pre-signing compliance status is issued. The research materials propose a digital force majeure clause. This term must be

formulated carefully so that it does not become a general justification for delaying the obligations. In the context of tax administration, digital force majeure should be defined as a material disruption to an official electronic system or infrastructure that lies beyond the user's reasonable control, is verified by the operator or a designated authority, and directly prevents the performance of a required action within a specified timeframe. This definition distinguishes widespread system failures from problems involving personal devices, data-entry errors, forgotten passwords, or failure to prepare necessary documents.

The designation of a digital force majeure status must be based on indicators and evidence. The authority should issue an incident status specifying the starting time, affected services, affected area or user group, severity of the disruption, alternative channels, and the expected recovery time. If the disruption affects only a single user, an individual verification mechanism may rely on request logs, status screenshots, ticket numbers, and technical examinations. Evidence should be retained under the transaction identifier so that the PPAT can confirm that the delay was genuinely caused by the disruption. The incident status should then produce predetermined legal consequences, such as the suspension of administrative sanctions directly related to service failure, proportionate extensions of deadlines, and protection for a PPAT who postpones signing in accordance with the prescribed procedure.

A digital force majeure clause must not grant PPATs general authority to sign deeds without tax compliance. Its purpose is to provide an alternative route to fulfillment, not to eliminate prerequisites. Therefore, the research proposes an integrated escrow account. In a more appropriate legal construction, the account should be an official escrow account or tax-deposit mechanism administered under state authority and connected to a collecting agent rather than a private account controlled by the PPAT. The taxpayer deposits the amount of the obligation calculated from the transaction data; the system or an emergency officer issues temporary proof of deposit bearing a unique number; and once the service is restored, the funds are reconciled to the correct tax account, and final proof of state revenue is issued.

For this mechanism to serve as a temporary prerequisite for signing, an explicit legal basis is required. The regulation should provide that a deposit into the official escrow account during a disruption, accompanied by complete transaction data and identity verification, constitutes a temporary fulfillment of the payment obligation for the purposes of Article 193. This status does not eliminate the obligation of formal verification but allows verification to be conducted through an emergency procedure or completed immediately after the system is restored. A PPAT may rely only on temporary evidence issued by the authority and verifiable through an independent channel, not on an ordinary transfer receipt. This approach preserves control over state revenue and minimizes the opportunities for forgery.

The escrow mechanism must also address these discrepancies. If formal verification subsequently reveals an underpayment caused by inaccurate data supplied by the taxpayer, the taxpayer remains obliged to pay the shortfall, together with the applicable legal consequences. If the discrepancy results from a system error or an official parameter, the correction should be made without imposing sanctions on a good-faith user. If the transaction is cancelled, any refund or transfer of payment should follow documented tax procedures. Funds held in escrow must not be used for any other purpose, must be segregated from the administrator's assets, and must be subject to audit. This design enables the escrow account to operate as an administrative safety valve rather than a new regulatory grey area.

In addition to an alternative payment channel, emergency services require an alternative formal verification channel. During a total outage, authorized officers may conduct examinations based on data uploaded through a backup portal or submitted at a designated service desk and then issue a verification token with a limited validity period. Once the primary system is restored, all tokens must be reconciled. The use of the backup portal must be recorded and restricted to prevent it from becoming a routine channel that undermines automation. The governing principle is the continuity of public service: essential legal functions should continue under equivalent controls, even when the primary channel is disrupted. This is consistent with the need to protect users of electronic services by treating reliability and recovery mechanisms as components of transactional justice (Rahma et al., 2022).

Responsibility can then be allocated according to the source of the error and degree of control. Taxpayers are responsible for the accuracy of data and sufficiency of payment; PPATs are responsible for examining the status and complying with deed formalities; banks or collecting agents are responsible for receiving and forwarding funds in accordance with their mandate; system operators are responsible for reliability, security, incident information, and recovery; and data-owning institutions are responsible for the quality of data

within their jurisdiction. If several factors contribute to the loss, responsibility should be apportioned based on audit-trail evidence. This formulation avoids two extremes: complete immunity for the system operator and unlimited liability for the PPAT. This is consistent with Putra, Budiartha, and Kosasih (2024), who identified prudential principles, risk management, force majeure clauses, clear responsibility, and legal certainty as essential elements of service design for reducing risk and ensuring balanced protection for the parties.

Ultimately, digital force majeure, emergency channels, and escrow accounts will be effective only if they are integrated into regulations and operational simulations. Authorities should conduct periodic testing, issue standard procedures, train officers, and provide information in an accessible form. Professional organizationsof PPATs should be involved to ensure that the procedures can be implemented in practice, including in areas with limited connectivity. Periodic evaluation should measure not only system uptime but also the number of delayed transactions, recovery time, causes of failure, and effectiveness of emergency channels. Under this approach, policy evaluation becomes a learning mechanism that simultaneously generates legal and technical improvements.

Implications of the Reconstruction for Legal Certainty and Public Services

The proposed reconstruction has implications at three levels: At the normative level, it transforms a rule centered on the prohibition against signing before evidence is available into a procedural rule that explains how evidence is obtained, verified, maintained, and replaced in an emergency. Legal certainty arises not only from the firmness of a prohibition but also from the completeness of the procedure. At the institutional level, the model requires interoperability and explicit role division. At the technological level, it requires a single transaction identifier, data locking, audit trails, a backup portal, and automatic reconciliation. These three levels must develop together: application changes without normative reform leave ambiguity unresolved, while normative reform without infrastructure cannot be implemented.

For taxpayers, the principal benefit is the ability to predict the required steps and their consequences for tax compliance. The parties can identify missing documents, payment status, verification time, and applicable procedures when a disruption occurs. Incident evidence protects them from consequences that should not be attributed to them, while the escrow account demonstrates readiness to pay, even when the primary channel is unavailable. For PPATs, the model provides clearer limits of responsibility and a legal basis for postponing or proceeding with actions. A PPAT need not make a technical assessment of the cause of an error because the incident status and alternative evidence are issued by an authority. For the state, the model maintains control over revenue while reducing disputes and manual-service burdens arising from unclear statuses.

For the authenticity of deeds, the principal benefit is the preservation of the unity of the session. By completing the validation before reading, the deed-making process does not depend on resource-intensive real-time system operations. A brief verification at the beginning of the session is sufficient to confirm that the status remains valid and that the data have not been changed. This approach is safer than completing the entire payment or verification process when the parties are already prepared to sign the contract. The future use of electronic signatures or remote facilities, if further regulated, would still require specific normative reform and authentication standards. This study does not consider tax digitalization as an implicit basis for expanding cyber-notary practices. This position is consistent with studies advocating gradual reform, an explicit legal foundation, and protection of the integrity of the office (Agustin & Anand, 2021; Biemans, 2021; Mannas et al., 2024; Sendrawan et al., 2025).

Harmonization can be pursued in stages at the regulatory level. Minister of Finance regulations and technical regulations issued by the Directorate General of Taxes should govern pre-signing compliance status, its validity period, digital force majeure, emergency channels, consequences for sanctions, and the escrow mechanism. Regulations governing land affairs and the office of PPAT should adjust the procedures for verifying electronic evidence, retaining audit trails, and transmitting post-signing data. Inter-agency agreements or regulations should establish standards for data exchange and for incident management. If future development is directed toward the electronic or remote execution of deeds, the change must be made through a regulatory instrument consistent with the statutory mandate and cannot be achieved merely through application policy. The hierarchy of legislation would thereby remain respected.

The novelty of the model also lies in treating post-signing reconciliation as a stage with independent legal functions. Integration is often understood as a requirement for all systems to produce identical results

instantaneously. In practice, distributed systems may experience delays or differences in their update times. Reconciliation acknowledges this technical reality without sacrificing certainty of the outcome. Provided that the prerequisites are verified and the deed is properly executed, non-material administrative discrepancies can be corrected through a documented post-signing process. However, reconciliation must not be used to validate material deficiencies that should have been resolved before signing. This boundary prevents technical flexibility from relaxing legal obligations.

Overall, a digital transformation oriented toward legal certainty must combine three values: efficiency, integrity, and, resilience. Efficiency reduces duplication and service time; integrity ensures that data and actions can be trusted; and resilience ensures that services retain a lawful pathway when the system fails. Coretax has established an important foundation for integration, but resilience must be more clearly embedded in the implementation norms. Through the three-stage model, digital force majeure, and an official escrow account, the system can progress from being merely digital by default to becoming a legally resilient digital service, capable of safeguarding rights, obligations, and evidence under both normal and disrupted conditions.

CONCLUSION

The migration of Income Tax reporting and formal verification for transfers of land and/or building rights into the Core Tax System strengthens administrative integration but creates functional tension because system output becomes a prerequisite for signing a deed, while the regulations do not yet provide uniform mechanisms for addressing service failures, data mismatches, and the allocation of responsibility. Article 193 of Minister of Finance Regulation No. 81 of 2024 establishes a sequence in which the party transferring the right fulfills the payment obligation before signing, after which the authorized official, including a PPAT, signs only after the evidence has been submitted and formally verified. The central problem is not a direct conflict between all provisions of the Law on the Office of Notary and the PPAT regime but the potential discontinuity between digital tax prerequisites and the unity of the authentication process. Coretax disruption does not reduce the evidentiary force of a deed; however, the absence of emergency procedures may lead to indefinite postponement or responses that depart from formal requirements, thereby increasing risks for taxpayers, PPATs, and the parties. To ensure legal certainty, this study reconstructs the procedure into three stages: pre-signing compliance, which completes and locks data verification, payment, and formal verification before the deed-making session; the signing session, which preserves reading, consent, and signing as a single sequence; and post-signing reconciliation, which matches the deed, payment, and land data without automatically affecting the validity of the deed. The model should be supplemented by measurable digital force majeure norms, an official incident status, suspension of administrative consequences for good-faith users, audit trails, interoperability based on a single transaction identifier, and an official escrow account as an emergency payment channel. Its practical implications include the need to harmonize regulations between tax and land authorities, establish transparent service and recovery standards, and allocate responsibility according to the source of error and degree of control. Under this design, tax digitalization pursues not only efficiency, but also the authenticity of deeds, protection of the PPAT's office, state revenue, and fair legal certainty for the parties.

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