

RESEARCH ON TAX DEBT COLLECTION: A LITERATURE REVIEW

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ABSTRACT

The Audit Board's audit reports from 2021 to 2023 consistently reveal suboptimal tax debt collection implementation in Indonesia, with policies stagnating for over 20 years. This highlights the need to evaluate Indonesia's tax collection law based on recent research. However, research on tax debt collection is relatively limited, and an understanding of the research development in related topics is not yet available. Through a literature review and thematic analysis, the authors identified six research themes related to tax debt collection: "Causes of Tax Arrears," "The Government as a Tax Creditor," "Tax Debt Collection Strategies," "Protection of Tax Delinquent's Rights," "Utilization of Information Systems and Technology in Tax Debt Collection," and "Tax Delinquent's Reactions to Tax Debt Collection Measures." The mapping of these themes can guide future research or policy improvements related to tax debt collection that are needed in Indonesia.

KEYWORDS

Tax Debt Collection, Tax Collection, Tax Compliance, Tax Debt Management, Tax Arrears



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INTRODUCTION

Tax debt collection is one of the main processes that is important for a tax administration to have (Alink & Kommer, 2016; Shome, 2021). This instrument is a manifestation of the coercive element of tax in the classical paradigm, in which the existence is still needed to anticipate the presence of taxpayers who do not fulfill their tax obligations voluntarily, despite the implementation of a self-assessment system (Gunadi, 2016; Rosdiana & Irianto, 2014). Regardless of the various approaches that a country can take, the government still needs official power and an organization that can find tax delinquents, convince them to pay, and search for their property or source of income to pay off the arrears if they do not comply (Yudkin, 1971).

In Indonesia, tax authorities collect tax debt based on Law Number 19 of 1997 concerning Tax Collection with Distress Warrant as amended by Law Number 19 of 2000 (TC Law). Unlike the Law on General Provisions of Taxation and Tax Procedures, the Law on Income Tax, and the Law on Value Added Tax and Luxury Goods Sales Tax, which have undergone numerous adjustments, the substance of the TC Law has remained

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unchanged for over two decades since its last revision. Even when the Directorate General of Taxes was carrying out tax reform by introducing many tax policy changes through the Law on Harmonization of Tax Regulations, the TC Law was not included in the agenda and retained its old content.

The absence of adjustments to the TC Law can be justified if the practice of tax debt collection in Indonesia runs optimally through existing regulations. However, the findings of the Audit Board in the Internal Control System and Compliance Audit Report, which is published annually, indicate that the ideal conditions for the implementation of tax debt collection have not yet been achieved. The problems that arise concerning suboptimal enforced collection measures in collecting long-term tax delinquencies, inadequate administration of seized goods and collateral related to tax debt, as well as insufficient tax arrears' administration (Badan Pemeriksa Keuangan, 2022, 2023, 2024) should serve as a trigger to reevaluate whether the current TC Law supports the implementation of tax debt collection to achieve the desired goals.

Although indications of tax debt collection problems were found, research related to it compared to other tax research topics is relatively minimal and lagging. The result of a basic search conducted by the authors on Scopus, ProQuest, and Google Scholar, as illustrated in Table 1, indicates that research on tax debt collection, denoted by the keyword "Tax Debt Collection", consistently ranks lowest in quantity across all databases when compared to other main tax administration processes (Alink & Kommer, 2016). Although the search outcome for "Tax Collection" consistently ranks first, the term's definition is too broad as it frequently includes issues not directly associated with the collection of tax arrears. Including the "Tax Debt" component in the search keyword drastically reduces the quantity of search results.

Table 1. Comparison of Search Outcomes for Research Article on Tax Topics

Keywords	Quantity of Articles		
	Scopus	ProQuest	Google Scholar
"Tax Service"	311	2.480	~24.900
"Tax Registration"	21	465	7.840
"Tax Assessment"	314	3.605	~73.400
"Tax Audit"	332	2.208	~20.000
"Tax Collection"	1.183	8.704	~306.000
"Tax Investigation"	11	369	3.530
"Tax Debt Collection"	4	42	323

The low number of studies that focus on tax debt collection can potentially hamper the development of policies in the field itself. When the government is often required to formulate or evaluate policies based on evidence or a scientific approach, the limited research literature on tax debt collection issues can result in a lack of relevant and useful materials to trigger policy formulation or review. Therefore, research on topics such as tax debt collection is needed. However, when there has been no effort to study the development of knowledge resulting from various tax debt collection studies that have been ongoing so far, it is difficult to know what themes related to tax debt collection need to be studied further by researchers in the future or what needs to be the attention of decision makers on tax debt collection.

Based on these problems, the authors conducted a literature review on the topic of tax debt collection to identify themes that emerged in the research. This review aimed to provide recommended research directions in the field of tax debt collection, which can be beneficial for both developing future research in this area and meeting the practical knowledge needs of policy makers. To achieve these objectives, the authors attempted to

answer three key questions. First, what relevant literature has been discovered so far related to studies on tax debt collection? Second, what themes have emerged in literature related to tax debt collection so far? And lastly, what insights could existing studies provide for future research on tax debt collection?

RESEARCH METHOD

Literature Review

The conducted study is a literature review that employs a semi-systematic literature review (SSLR) approach. A literature review provides a comprehensive overview of previous research on a specific topic, with methodologies that can vary depending on the objectives (Denney & Tewksbury, 2013; Snyder, 2019). SSLR summarizes a research area and its development over time, contributing to mapping the field, synthesizing knowledge, and providing a historical overview. It is more suitable for large, diverse issues investigated across multiple scientific domains than the systematic literature review (SLR) (Snyder, 2019). Considering the characteristics of the research questions and the fact that tax debt collection has been studied in various disciplines, the authors chose to use the SSLR approach.

The review process consists of three clearly defined stages: 1) defining the topic, scope, and objectives so that the keywords used in the literature search can be identified; 2) searching, recording, and evaluating relevant literature, which requires a transparent and systematic, consistent and orderly, critical and analytically meticulous approach; 3) summarizing and organizing the reviewed literature into various themes (Easterby-Smith et al., 2021). To meet the requirements of a systematic approach in determining relevant literature, the authors employed the steps of conducting the review: searching the literature, screening for inclusion, and assessing quality (Xiao & Watson, 2019). Subsequently, the authors engaged in thematic analysis to study relevant literature. The following section provides further details about the implementation of SSLR.

Literature Identification

The authors conducted a comprehensive article search across several electronic databases, including Scopus, ProQuest, Sage Journals, Emerald, Science Direct, and Taylor & Francis, to gather relevant articles for review. When selecting the database, the availability of features to filter and download search results in a .ris file format was considered. The authors narrowed the search to article document types, English-only articles, and peer-reviewed articles to filter the literature. The search has been conducted since June 10, 2024.

Despite the potential interpretation of the term "Tax Collection" as tax debt collection, the authors searched for articles containing "Tax Debt". This is because "Tax Collection" can encompass a far too wide range of topics. The inclusion of "Tax Debt" will highlight the particularity of the tax debt collection in question. Therefore, the utilized search keyword is "Tax Debt Collection". The Boolean operator (" ") is added to ensure the exact phrase is present in the searched article. However, applying the keyword resulted in a few finds across the database. To increase results during the search stage, keyword enhancement was carried out by employing other words that have similar meanings to tax debt or tax debt collection, such as "Tax Arrears", "Unpaid Tax", "Delinquent Tax", and "Enforced Collection". The use of Boolean operators, such as AND, to delineate keywords that represent tax debt and tax debt collection is also carried out to broaden the search results. **Table 2** lists the nine queries used in the search and the number of articles found. The total initial search yielded 1,494 articles.

Table 2. Results of the Search and Selection of Articles

Search Query	Sco- pus	Pro- Quest	Sage Journals	Emerald	Science Direct	Taylor & Francis	Total
"Tax Debt Collection"	4	14	1	1	3	2	25
"Tax Arrears Collection"	1	0	1	0	0	4	6
"Delinquent Tax Collection"	1	4	2	0	0	1	8
"Unpaid Tax Collection"	0	0	0	0	0	0	0
"Enforced Tax Debt Collection"	2	3	1	3	23	5	37
"Tax Debt" AND "Collection"	15	234	33	36	97	79	494
"Tax Arrears" AND "Collection"	6	163	53	27	61	185	495
"Delinquent Tax" AND "Collection"	4	46	16	5	28	23	122
"Unpaid Tax" AND "Collection"	4	116	23	38	89	37	307
Database Search Results	37	580	130	110	301	336	1494
Automatic Duplicate Removal in Mendeley Desktop							-260
Total Articles after Automatic Duplicate Removal							1234
Article Filtering Using Search Feature on Mendeley Desktop							-989
Total Articles to be Screened Based on the Abstract Reading							245
Exclusion of Article with Irrelevant Abstract or Lacked Author Information							-182
Exclusion of Inaccessible Article							-10
Exclusion of Reference: Referring to the Same Article							-1
Exclusion of Irrelevant Article Based on Skimming of Content							-5
Exclusion of Non-Research Articles from Literature							-7
Total Article to be Assessed in its Relevance and Quality							40
Exclusion Based on Journal Index							-11
Exclusion of Article in Discontinued Journal							-1
Selected Articles for Thematic Analysis							28

The search results on each database were downloaded into a .ris file to be compiled into the reference management application Mendeley Desktop. This process produced 1,234 articles, indicating 260 duplicate results. Using the keyword "collect*" in the Mendeley Desktop search feature, the authors excluded articles with abstracts or titles that did not contain a "collection" related word. The search resulted in 245 articles for abstract skimming.

Screening for Inclusion

After skimming 245 articles' abstracts, the author removed those without author information or with titles or abstracts unrelated to tax debt collection. The screening yielded 63 articles for PDF file retrieval. The author's lack of access to the articles resulted in a reduction of 10 articles. Additionally, 1 article was dismissed for referencing the same article. The authors then skimmed the content and conclusions of 52 articles they had gathered. The authors decided that 5 articles were deemed irrelevant to tax debt collection, and 7 articles did not qualify as research articles. 40 articles remained for quality and eligibility assessment.

Quality and Eligibility Assessment

In determining the quality of the research articles, the authors limited the literature review to articles published in indexed journals. The index the authors referred to is either the Scimago Journal Rank (SJR) or the ABDC Journal Quality List (ABDC). The

assessment revealed 14 articles published in journals without any indexing by either SJR or ABDC. During the research, the authors removed 1 article that had previously met quality standards because the journal in which it was published was indicated as discontinued. The authors ultimately identified 28 articles as relevant and suitable for a thorough literature review and further analysis.

Thematic Analysis

The authors used a thematic analysis approach to analyze the article to obtain research answers. Thematic analysis consists of five steps: compiling, disassembling, reassembling, interpreting, and concluding (Castleberry & Nolen, 2018). The analysis involved a series of stages, starting with the compiling stage, where the authors familiarized themselves with existing research. The authors then summarized the significant material and compiled it into a Word file. The disassembling stage involved breaking down the data and organizing meaningful groupings. The authors applied coding strategies using NVivo 12 to identify similarities among the chosen articles in the review. The authors employed two coding approaches. The first approach uses coding that adheres to the OECD's principles of tax debt management strategy, which encompass taxpayer engagement before the tax debt is due, collection before the use of enforcement, use of enforcement measures, and realistic debt recovery (OECD, 2019). The second approach uses open coding to uncover additional patterns. The reassembling phase involved classifying the gathered codes into a specific context, which generated a theme. The authors organized a hierarchy of similar codes to derive themes from the current tax debt collection research. The interpretation stage entails creating a thematic map to represent themes and their relationships. The process can be non-linear to obtain the appropriate theme and may undergo multiple tests. The concluding stage of thematic analysis involves summarizing the findings to answer the research questions. The following sections display the outcomes of the literature review process and its analysis.

RESULT AND DISCUSSION

Descriptive Characteristics of the Reviewed Literature

28 articles were found to be relevant to tax debt collection. Figure 1 depicts these works' publication years. The earliest research article on tax debt collection challenges that the authors found dates back to 1939 (Craig, 1939). No relevant articles were found for over 50 years after that year. Post-2010, research articles on tax debt collection started to appear regularly and increase in number. However, research articles on tax debt collection are still scarce. The highest number of articles published in a year is only four. Since 2015, about two tax debt collection articles have been published annually. This suggests that tax debt collection as a research topic has untapped potential for further development and exploration.

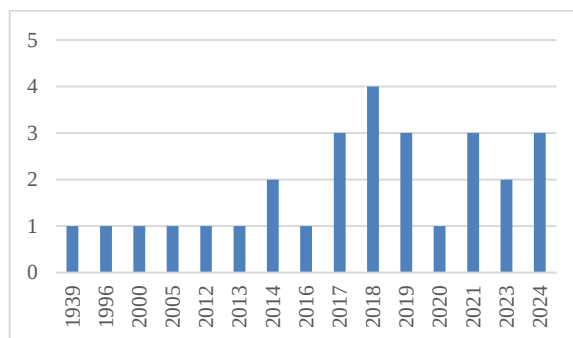


Figure 1. Year of Publication of the Identified Tax Debt Collection Research Articles

As shown in Figure 2, nearly half of the tax debt collection issues examined are in the United States (US), with a total of 13 articles. That number far exceeds Australia (3 articles) and Malaysia (2 articles) in second and third place. The remaining countries, Brazil, Finland, the United Kingdom (UK), Colombia, South Korea, Morocco, New Zealand, Slovenia, and Greece, each had 1 article. Due to its focus on country comparisons, one of the articles examined could not be categorized as research for a specific country. The countries compared in that study are not detailed in Figure 2. These countries are the UK, Australia, New Zealand, Canada, the US, Germany, France, and Mexico (Morgan, 2000). Based on the literature review process conducted, the authors were unable to obtain an Indonesian research article that passed the quality assessment. The absence indicates the scarcity of research on tax debt collection from Indonesia published in SJR or ABDC-indexed journals.

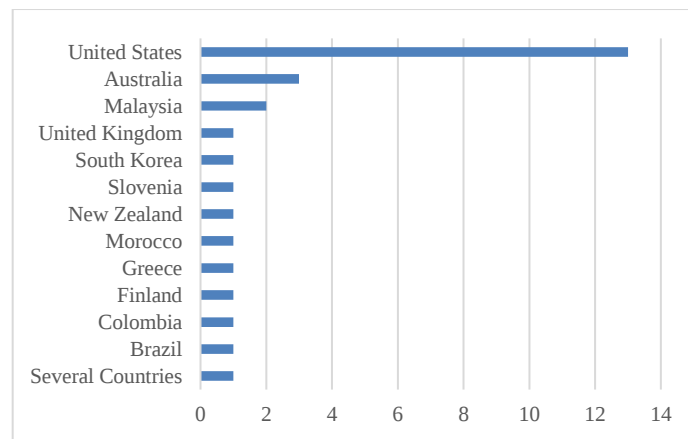


Figure 2. Examined Countries in Tax Debt Collection Research

The identified articles' research methodologies are sometimes not explicitly explained, so the authors classify them by the most similar research type. The research employed in tax debt collection studies can be classified into two categories: the quantitative approach, comprising 17 articles, and the qualitative approach, containing 11 articles, as shown in Figure 3. Typically, quantitative research articles employ descriptive, experimental, and operational methods, whereas qualitative research employs case studies. The methodologies used in the selected articles highlight the multidisciplinary nature of tax debt collection research. The disciplines that might approach the subject are legal studies, economics, administration, politics, psychology, and information systems and technology.

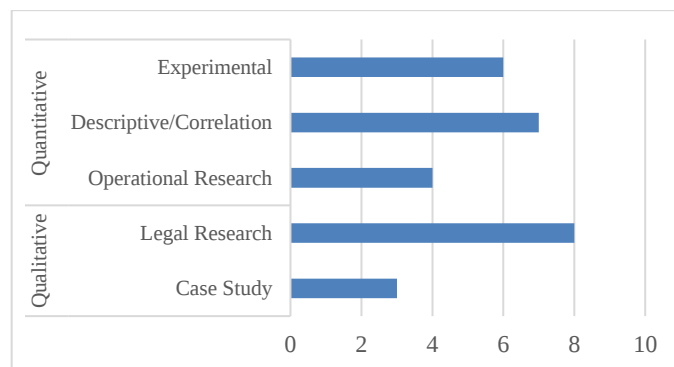


Figure 3. Method Types of Tax Debt Collection Research Identified

Identified Theme

The authors identified six themes in the articles based on their content patterns. The topics discussed include "Causes of Tax Arrears", "The Government as a Tax Creditor", "Tax Debt Collection Strategies", "Protection of Tax Delinquent's Rights", "Utilization of Information Systems and Technology in Tax Debt Collection", and "Tax Delinquent's Reactions to Tax Debt Collection Measures". The following section outlines further details regarding each theme.

Theme 1: Causes of Tax Arrears

Discussion about factors that trigger tax delinquency was found in 10 of 28 articles. The causes identified are diverse. Nevertheless, as can be seen in Table 3, the causes of tax arrears can generally be categorized into three groups: triggers stemming from government policies, economic conditions, and the circumstances and characteristics of tax delinquents.

Table 3. Subthemes of Causes of Tax Arrears

Subthemes	References	Codes
1. Government Policy	(Abdullah et al., 2023; Baskett & Bradley, 2021; Craig, 1939; Gumley & Wyatt, 1996; Mikesell & Liu, 2013; Millane & Stewart, 2019; Tagkalakis, 2014)	Overassessment, Provisions for Imposition and Waiver of Penalties, Tax Administrations.
2. Economic Condition	(Baskett & Bradley, 2021; Craig, 1939; Höglund, 2017; Lesnik et al., 2014; Mikesell & Liu, 2013; Mohamad et al., 2017)	Recession, Unemployment Rate, Stock Market Index, Production Index, Wage Level, GDP Growth.
3. Circumstances and Characteristics of Tax Delinquents	(Baskett & Bradley, 2021; Craig, 1939; Höglund, 2017; Mohamad et al., 2017)	Death of the Property Owner; Unexpected Expenses; Unwise Investments; Socio-Psychological Factors; Financial Health.

Tax arrears caused by government policies are often linked to overassessment, especially in property tax studies. To encourage timely payment, local governments must ensure clear and accurate tax assessment processes (Abdullah et al., 2023). However, infrequent assessments hinder property tax calculations from reflecting market value changes (Baskett & Bradley, 2021; Mikesell & Liu, 2013). The assessment lag can hurt middle- and lower-income taxpayers during recessions, when vulnerable groups' property value and income are low, by forcing them to pay property taxes based on outdated assessments (Craig, 1939; Mikesell & Liu, 2013).

Excessive tax assessments can also emerge from differences in income tax interpretations. Without an explicit provision to defer tax debt collection during legal disputes over assessments, taxpayers may face financial and legal burdens, hindering their ability to pay the tax debts and expand their businesses (Gumley & Wyatt, 1996). The mismatch between collection timing and taxpayers' income periods leads to unpaid debts, since assessments reflect past rather than current payment capabilities (Craig, 1939). The intensification of tax audits could worsen tax arrears when the authorities cannot collect the increasing tax debts and penalties effectively (Tagkalakis, 2014).

Policies on penalties and tax administration may contribute to tax arrears. The severity of sanctions and the existence of provisions to waive them could influence taxpayers' payment (Craig, 1939). In Greece, repeated tax amnesty has exacerbated tax arrears and uncollectible fines, resulting in decreased tax revenue (Tagkalakis, 2014). Neglecting recent tax debts to collect old ones complicates collection efforts (Craig, 1939).

Implementing withholding tax can help mitigate the occurrence of tax arrears (Abdullah et al., 2023; Millane & Stewart, 2019). Proactive governments' roles in reminding, educating, and negotiating, supported with realistic rates and excellent services and staff, can further aid in resolving tax arrears (Abdullah et al., 2023).

Economic conditions also affect tax arrears. In several US' cities, property tax delinquencies rose between 2008 and 2010 due to the Great Recession, despite no strong link between property values and delinquencies (Mikesell & Liu, 2013). Similar events were observed during the real estate boom's collapse in 1924-1926 (Craig, 1939). Recession-related difficulties and unaccounted declining property value hinder homeowners' ability to pay property taxes (Baskett & Bradley, 2021). A Slovenian study also noted that the recession adversely impacted public finances, decreasing tax revenue and increasing tax debt, driven by rising unemployment and declining stock market and production indicators (Lesnik et al., 2014). Likewise, Malaysian research found that real gross domestic product negatively affects individual taxpayer tax arrears (Mohamad et al., 2017).

Various circumstances and characteristics of tax delinquent can determine tendency to default. Personal issues such as death, unanticipated burdens, and unwise investment can lead to tax arrears (Craig, 1939). A Malaysian study highlights that psychosocial factor like income, age, and gender influence tax arrears (Mohamad et al., 2017). Additionally, a Finnish study identified solvency, liquidity, and taxpayer trade debt payment periods as predictors of tax payment failures (Höglund, 2017). Liquidity issues are also cited as a cause of tax arrears in other article (Baskett & Bradley, 2021).

Theme 2: The Government as a Tax Creditor

11 of 28 articles discussed the role of the government as a tax creditor. Tax debts are typically given priority over other debt types and creditors, and the government has more authority to collect them as the creditor. Table 4 divides the topic into two groups: the position of tax debt and government's creditor power.

Table 4. Subthemes of The Government as a Tax Creditor

Subthemes	References	Codes
1. The Position of Tax Debt	(Jenks, 2005; Morgan, 2000)	Justification and Critique of Tax Debt Prioritization; Policy on Tax Debt Prioritization; Involvement of Tax Authorities in Bankruptcy Policy Formulation.
2. Creditor Power of the Government	(Bagchi, 2016; Baskett & Bradley, 2021; Camp, 2019; Fogg, 2021; Gumley & Wyatt, 1996; Jang & Eger, 2018; Marriott, 2018; McNeill, 2018; Millane & Stewart, 2019; Morgan, 2000)	Advantages of the Government as a Creditor; Involvement of Third Parties; Coordination of Tax Debt Collection and Collection of Other Government Debts; Influence of Political Party Leadership on Tax Debt Collection.

Tax debts are prioritized over others due to public interest, involuntary creditor status, potential misuse of withheld taxes, and bankruptcy-related tax evasion. However, these reasons are debatable given that the government can recover losses from taxing tax delinquents' creditor income, employing broader collection measures, and receiving pro rata distribution of bankruptcy assets. A comparison of tax and bankruptcy regulations across various countries shows three approaches to tax debt prioritization: abolishing, diminishing, and upholding. While there is a trend towards reducing tax priority, poorly designed rules and enforcement may lead to government losses. Effective policymaking in tax debt prioritization requires empirical data on creditor payments and bankruptcy especially when prioritizing tax debt does not automatically encourage collection or

prevent debt accumulation (Morgan, 2000). In changing bankruptcy policy, the involvement of tax authorities on the legislation could lead the three-way tension in bankruptcy adjustment—the endeavor to give debtors a fresh start, reasonable debt recovery for creditors, and the government's ability to collect tax debts—favors the government (Jenks, 2005).

Whether excessive or not, the government can recover tax arrears through powers unavailable to other creditors such as accessing taxpayer information, imposing high penalties, collecting from third-party debtors, banning travel, requesting corporate tax payments from directors, and limiting asset disposal or transfers (Gumley & Wyatt, 1996; McNeill, 2018; Morgan, 2000). The tax authority's discretion in granting relief or imposing measures strengthens these advantages, although lawmakers' intent typically constrains this discretion (Camp, 2019; Fogg, 2021; Gumley & Wyatt, 1996).

The government may privatize tax debt collection for cost reduction, which could lead to power abuse by third parties. Private collectors can issue notices, set repayment plans, and manage tax issues related to death or bankruptcy in exchange for receiving a portion of the collected amount. However, using private collectors does not affect tax arrears and has an inconclusive effect on procedural fairness (Jang & Eger, 2018). Additionally, the involvement of third parties in tax debt collection includes the sale of tax debt claims, which shifts payment risks to tax lien buyers seeking profit from interest or property sales. While critics contend that this practice exploits vulnerable taxpayers and lacks accountability, local officials persist in endorsing tax lien sales for political purposes, bolstered by banks and hedge funds, and further reinforced by restricted information access (Baskett & Bradley, 2021). Other tax debt collection roles for third parties mentioned in other articles include the bearer of tax debt burden due to their status as debtors or directors of enterprises (Fogg, 2021; Gumley & Wyatt, 1996), partners in providing information related to the credit rating of delinquent taxpayers, agents that withhold delinquent taxpayers' income (Marriott, 2018; Millane & Stewart, 2019), or appointed trustees that manage insolvent estates and can utilize government collection provisions to recover assets from bankrupt debtors (McNeill, 2018; Morgan, 2000).

A New Zealand comparative study of the government's ability to collect tax and other government debt shows that varying agency collection methods may result in unfair outcomes. A unified approach to debt management could mitigate these issues by enabling smaller units to adopt best practices from larger units (Marriott, 2018). The US Treasury Offset Program exemplifies such a holistic approach. Under this program, the IRS notifies the Bureau of the Fiscal Services about the offset surplus, which they can apply to other federal or state tax debt (Fogg, 2021). Additionally, political parties may influence revenue collection power. Congress and the President determined budget and resource allocations that impacted IRS collection capabilities from 1978 to 2010. Changes in party control affected IRS budgets and enforcement personnel, with enforcement increasing when the ruling party shifted from Republican to Democratic, reflecting how the ruling party's ideology shapes tax law enforcement (Bagchi, 2016).

Theme 3: Tax Debt Collection Strategies

Discussions about tax debt collection strategies were found in 26 of 28 articles. Based on the OECD's strategic principle in tax debt management, the themes can be grouped into topics about taxpayer engagement before the tax debt is due, collection before the use of enforcement, use of enforcement measures, and realistic debt recovery (OECD, 2019), as detailed in Table 5.

Table 5. Subthemes of Tax Debt Collection Strategies

Subthemes	References	Codes
1. Taxpayer Engagement Before the Tax Debt is Due	(Abdullah et al., 2023; Baskett & Bradley, 2021; Craig, 1939; Gumley & Wyatt, 1996; Höglund, 2017; Mikesell & Liu, 2013; Millane & Stewart, 2019; Miller et al., 2012)	Policy, Audit, and Tax Assessment Improvements; Improvement of Services and Payment Facilities; Increase in Taxpayer Awareness; Withholding Tax; Payment Incentive; Automated Due Date Reminders; Tax Default Prediction; Tax Delinquents Segmentation and Clustering.
2. Collection Before the Use of Enforcement	(Chirico et al., 2019; Craig, 1939; Fogg, 2021; Gillitzer & Sinning, 2020; Gumley & Wyatt, 1996; Hallsworth et al., 2017; Labarrère et al., 2024; Lesnik et al., 2014; Marriott, 2018; Millane & Stewart, 2019; Miller et al., 2012; Mogollon et al., 2021; Mohamad et al., 2017; Morgan, 2000)	Accelerating Collection After Due Date; Collection Escalation Policy; Installments and Postponements; Correspondence; Phone Use; Meetings.
3. Use of Enforcement Measures	(Baskett & Bradley, 2021; Craig, 1939; Fogg, 2021; Gumley & Wyatt, 1996; Jang & Eger, 2018; Jenks, 2005; Marriott, 2018; McNeill, 2018; Millane & Stewart, 2019; Miller et al., 2012; Morgan, 2000; Perez-Truglia & Troiano, 2018; Ponoroff, 2023)	Enforced Collection Policy; Tax Seizure and Sale; Offset of Tax Overpayments; Bankruptcy Initiation; Measures Not Targeting Taxpayer Assets.
4. Realistic Debt Recovery	(Gumley & Wyatt, 1996; Lesnik et al., 2014; Marriott, 2018; McNeill, 2018; Mohamad et al., 2017; Tagkalakis, 2014)	Tax Debt Write-Off Due to Liquidity Issues; Tax Debt Write-Off Limitations; Statute of Limitations and its Suspension; Caution in Tax Debt Write-Off.

Discussions on engaging taxpayers before due dates often emphasize strategies to minimize the emergence of tax debt. To prevent arrears, tax policies and audits or assessments should not overburden taxpayers (Abdullah et al., 2023; Baskett & Bradley, 2021; Craig, 1939; Gumley & Wyatt, 1996; Mikesell & Liu, 2013). Providing multiple payment methods or taxpayer account systems might encourage timely payments (Abdullah et al., 2023; Millane & Stewart, 2019). Educational programs aimed at taxpayers' awareness may also reduce debt (Abdullah et al., 2023; Mohamad et al., 2017). Expanding withholding mechanisms and advance payments can further mitigate late payments (Millane & Stewart, 2019). Incentives for early payment or penalties for late payment may induce timely settlement (Abdullah et al., 2023; Labarrère et al., 2024). Automating due date reminders via email or text can prevent tax debt (Labarrère et al., 2024). Additionally, tax authorities can utilize diverse data analysis models to predict taxpayer behavior based on financial reports, credit data, and demographics, allowing taxpayer segmentation or clustering for planning

collection strategies (Höglund, 2017; Labarrère et al., 2024; Lee & Kim, 2024; Millane & Stewart, 2019; Miller et al., 2012; Ourdani et al., 2024).

Overdue tax debts should be addressed swiftly, as delays make settlement more challenging (Craig, 1939; Millane & Stewart, 2019). Tax authorities typically employ non-coercive measures before resorting to harsher ones (Millane & Stewart, 2019). Data analysis and taxpayer profiling improve the staged tax debt collection model, allowing authorities to predict the most suitable measures. This enables immediate enforcement of harsher measures on non-compliant taxpayers before their ability to pay deteriorates (Miller et al., 2012; Mohamad et al., 2017). Conversely, more lenient measures may be justified to protect taxpayer liquidity during a recession (Lesnik et al., 2014).

Numerous articles identified various methods to use before applying enforcement measures. Offering postponement or installments should be prioritized (Craig, 1939; Fogg, 2021; Gumley & Wyatt, 1996; Millane & Stewart, 2019; Mohamad et al., 2017; Morgan, 2000). While the tax authority has discretion over them, they must consider the taxpayer's financial situation and potential hardship in making decisions (Gumley & Wyatt, 1996; Millane & Stewart, 2019). The tax authority's installment plan may include late payment sanctions (Millane & Stewart, 2019), though some instances allow the penalty to be exempted (Marriott, 2018). Tax delinquents who fail to commit the agreement can be directly addressed with forced measures (Millane & Stewart, 2019).

Sending reminder letters as a form of soft enforcement (Marriott, 2018) has been shown to increase tax debt payments among taxpayers (Chirico et al., 2019; Gillitzer & Sinning, 2020; Hallsworth et al., 2017). The effectiveness of these letters depends on the substance of their message's substance (Chirico et al., 2019; Hallsworth et al., 2017). Earlier reminders can speed up the collection, although the cumulative probability of payment remains unchanged (Gillitzer & Sinning, 2020). However, their effectiveness diminishes for taxpayers with a significant amount of tax debt (Gillitzer & Sinning, 2020).

A telephone or call center can be a cheaper alternative to face-to-face measures before the collection escalates to coercive measures (Millane & Stewart, 2019; Miller et al., 2012). Calls can increase tax debt payment by obtaining commitments, but they may be ineffective if taxpayers are unreachable; thus, regularly updating contact information and evaluating targeting accuracy is necessary. Calling chronically delinquent taxpayers has been ineffective (Mogollon et al., 2021). If phone collection fails, immediate follow-up is essential to avoid delays in utilizing other measures (Miller et al., 2012). Personal meetings can encourage payment, as most taxpayers are willing to meet, though not all are successful. Despite higher costs historically (Miller et al., 2012), face-to-face contact has been shown to increase payment likelihood (Mogollon et al., 2021). Simplification of the process is crucial for enhancing taxpayer commitment (Mogollon et al., 2021).

Coercive measures can be employed after soft collection efforts fail or based on data analysis (Marriott, 2018; Miller et al., 2012). In this stage, tax delinquents may face asset seizure and sale, also known as tax lien or foreclosure, where tax authorities can claim property as collateral for unpaid tax debts. There are two types of tax lien follow-up: tax lien foreclosure, where the lien is auctioned to recover the owed amount, and tax deed sale, which transfers property ownership (Ponoroff, 2023). Taxpayers may still have a redemption period to repay debts and regain their already sold property (Baskett & Bradley, 2021). Additionally, the government follows up on the seizure by taking ownership of properties for public interest (Craig, 1939).

The government must be cautious when seizing assets to prevent costly legal disputes. Prioritizing seizures accuracy over quantity through data analysis can lessen taxpayer burdens and encourage payments (Miller et al., 2012). Allowing tax delinquents to sell or modify their properties for a better price can help cover tax debts (Baskett & Bradley,

2021). Tax lien and foreclosure policies that permit sales below fair value without returning any excess are problematic (Baskett & Bradley, 2021; Ponoroff, 2023). Fair market value assessments, increasing sale publicity, and returning excess proceeds after settling debts can solve that issue (Ponoroff, 2023). Tighter restrictions and oversight on third-party foreclosures are also necessary to prevent exploitation (Baskett & Bradley, 2021; Jang & Eger, 2018). Effective seizure implementation requires diligent recording of tax arrears-related properties (Craig, 1939) and regulations to prevent asset transfers that could undermine government claims (Gumley & Wyatt, 1996; Morgan, 2000). Allowing seizing diverse types of assets other than properties, including receivables and funds in accounts, can enhance the power of seizure (Fogg, 2021; Jenks, 2005; Millane & Stewart, 2019; Miller et al., 2012).

Tax authorities may initiate bankruptcy proceedings to recover payments from tax delinquents' assets, weighing the benefits of liquidation against the business continuation. Tax authorities prioritize tax debts and consider factors affecting tax debt settlement post-bankruptcy, such as limits on collection measures, safeguards against fraud, and the chance to recover taxpayers' pre-bankruptcy transfers (Gumley & Wyatt, 1996; McNeill, 2018; Morgan, 2000). Additionally, tax authorities have non-asset-taking coercive tools like public shaming, which increases visibility of tax delinquency and payment likelihood, particularly for lower-class delinquents (Perez-Truglia & Troiano, 2018). Other forms include travel bans (Gumley & Wyatt, 1996), license revocation, business closures, and restrictions on government contracting due to tax debts (Marriott, 2018).

Some tax debt remains uncollected due to economic unviability, lack of assets, or no collection tools left (OECD, 2019), enabling tax authorities to write off tax debts at the conclusion phase after assessing the taxpayer's financial situation (Gumley & Wyatt, 1996; Marriott, 2018). To aid taxpayers with liquidity issues or induce payment, reducing late payment interest or waiving penalties may be implemented (Lesnik et al., 2014; Mohamad et al., 2017). However, certain tax debts, particularly those from fraudulent activities, may be exempted from write-offs (Marriott, 2018). Tax authorities need to consider the statute of limitations on tax debt claims, as regulatory limits on asset transfers and suspending expiration dates can enhance debt realization (McNeill, 2018). Caution is necessary when writing off tax debts, as repeated amnesty can lead to increased defaults and tax arrears (Craig, 1939; Tagkalakis, 2014).

Theme 4: Protection of Tax Delinquent's Rights

7 out of 28 articles address the protection of tax delinquents' rights in tax debt collection through legal research or case studies. Table 6 shows that discussion on this theme focuses on three main issues: the consideration of taxpayers' hardship in tax debt collection decisions, tax debt collection policies that harm taxpayers, and legal remedies related to tax debt collection.

Table 6. Subthemes of Protection of Tax Delinquent's Rights

Subthemes	References	Codes
1. The Consideration of Taxpayers' Hardship in Tax Debt Collection Decisions	(Camp, 2019; Fogg, 2021; Gumley & Wyatt, 1996; Marriott, 2018; Millane & Stewart, 2019)	Considered Hardships; Discretion to Suspend Tax Debt Collection; Discretion to Release Payment Obligations.
2. Tax Debt Collection Policies that Harm Taxpayer	(Baskett & Bradley, 2021; Fogg, 2021; Gumley & Wyatt, 1996; Ponoroff, 2023)	Issues Related to the Delay in Collection Actions; Issues Related to Seizure and Sale; Restrictions on Provisions that Could Be Detrimental.

Subthemes	References	Codes
3. Legal Remedies Related to Tax Debt Collection	(Camp, 2019; Fogg, 2021; Gumley & Wyatt, 1996; Ponoroff, 2023)	Legal Efforts Regarding Discretion and Tax Debt Collection Decisions to Postpone Collection; Issues Related to Legal Efforts.

Payment postponement or installment are some ways often mentioned in articles to limit or dismiss collection measures (Fogg, 2021; Gumley & Wyatt, 1996; Marriott, 2018; Millane & Stewart, 2019; Ponoroff, 2023). Extensions are ideally granted when a taxpayer's business shows potential for recovery, indicating that the inability to pay timely is temporary (Gumley & Wyatt, 1996; Millane & Stewart, 2019). If the obligations are unmet, installment agreements may be revoked (Millane & Stewart, 2019). In some practices, tax authorities may delay offsetting overpayments (Fogg, 2021), or courts may order delays in tax debt collection due to taxpayer hardships (Gumley & Wyatt, 1996). In cases of serious hardship, some or all tax debt may be written off after a series of collection efforts (Gumley & Wyatt, 1996; Marriott, 2018). Remaining post-bankruptcy tax debts also may qualify to be waived (Marriott, 2018). Discretion in writing off tax debt can be limited if tax evaders incur tax debt (Marriott, 2018). Tax debt that has been written off might be recollected if the taxpayer's financial circumstances change (Gumley & Wyatt, 1996).

Some articles discussed harmful tax debt collection provision. Requiring partial debt payment to initiate legal action burdened taxpayer who already has difficulty challenging tax audit results. Without explicit provisions to defer collection, timely payments obligation can hinder business growth for those unable to request postponement (Gumley & Wyatt, 1996). Additionally, the lengthy process in decision-making to exempt offsets may prevent taxpayer to get restitution. In other case, offsetting low-income assistance related funds may exacerbates financial difficulties (Fogg, 2021).

Criticism of tax debt collection practices in the US' property tax highlights the physical and psychological vulnerabilities of homeowners facing tax lien sales and foreclosures without adequate compensation (Baskett & Bradley, 2021; Ponoroff, 2023). Tax privateers often sell properties linked to tax liens below fair market value, eroding taxpayers' wealth. Insufficient marketing, inspection, funding, and buyer interest triggered this practice. The foreclosure also contributes to gentrification, driving out residents as property values and taxes rise, particularly impacting retirees and fixed-income taxpayers during recessions (Baskett & Bradley, 2021). Additionally, some local governments' foreclosure practices result in taxpayers losing properties for debts disproportionate to the sale proceeds, leading to a Supreme Court ruling that deemed such provisions unconstitutional for violating the taking clause (Ponoroff, 2023).

Necessary restrictions should be made to tackle harmful provisions, such as suspending the obligation to settle disputed tax debts, to prevent financial loss for taxpayers (Gumley & Wyatt, 1996). The government also should implement a systemic mechanism for offset exemption decisions and target only allowable overpayment sources instead of relying on discretion (Fogg, 2021). Tax privateers' authority must be tightened by allowing foreclosure on a taxpayer's primary residence only after death, relocation, or property transfer to prevent eviction and homelessness. Recommendations include extending redemption periods, stricter warning requirements, limiting foreclosure profits, enhancing court oversight, and offering property tax deferral programs (Baskett & Bradley, 2021). Improving tax foreclosure through fair property valuation and adequate publicity can help prevent excessive government seizures (Ponoroff, 2023). While property tax exemptions and income-based payment terms can mitigate the regressive nature of property tax, the local government's reliance on property tax revenue complicates the implementation of more radical funding alternatives (Baskett & Bradley, 2021).

Studies on taxpayer rights protection highlight ways to challenge problematic practices. In 1996, Australian regulations allowed several legal efforts to suspend tax debt collection during challenging tax audit results, as dispute did not delay their obligation. The identified remedies target tax authorities' discretion regarding requests for obligation release, payment extensions, and bankruptcy (Gumley & Wyatt, 1996). In the US, Congress established an informal process to provide certainty against arbitrary tax authority discretion (Camp, 2019). Taxpayers can also contest incorrect offsets of overpayments against invalid tax debts (Fogg, 2021). Legal amendments may be necessary for tax collection provisions that violate constitutional rights (Ponoroff, 2023). However, litigation remains costly (Baskett & Bradley, 2021; Gumley & Wyatt, 1996), and the limited timeframe for alternative schemes prevents taxpayers from using them (Camp, 2019). Additionally, amending laws can be complicated by court decisions lacking clarity on constitutional violations (Ponoroff, 2023).

Theme 5: Utilization of Information Systems and Technology in Tax Debt Collection

7 of the 28 articles discussed how information systems and technology collect tax debt. Table 7 shows that the theme can be categorized into data analysis to support tax debt collection decision-making and technology utilization in collection measures.

Table 7. Subthemes of Utilization of Information Systems and Technology in Tax Debt Collection

Subthemes	References	Codes
1. Data Analysis to Support Tax Debt Collection Decision-Making	(Höglund, 2017; Lee & Kim, 2024; Miller et al., 2012; Ourdani et al., 2024)	Tax Default Prediction; Clustering and Segmentation for Making Decisions.
2. Technology Utilization in Collection Measures	(Labarrère et al., 2024; Millane & Stewart, 2019; Miller et al., 2012; Mogollon et al., 2021)	Telephone Usage; Email and Text Messaging; Taxpayer Account.

Advancements in data analysis technology have transformed tax debt collection management systems, allowing them to adapt to diverse taxpayer characteristics. A study by the New York tax authority demonstrated that a system analyzing 200 taxpayer-related features increased revenue by 8% in 2010, exceeding the expected projection by 3%. This data-driven approach improved efficiency, with revenue per action from tax liens and levies rising by 22% and 11%, respectively, while reducing the aging of collection cases by 9.3% (Miller et al., 2012). Similarly, the Moroccan tax authority utilized machine learning, particularly the K-means algorithm, to segment taxpayers based on tax arrears and behavior, tailoring collection actions accordingly (Ourdani et al., 2024). Additionally, predictive models using genetic algorithms and machine learning have been developed to forecast payment defaults and taxpayer behavior, with studies in Finland and South Korea demonstrating significant accuracy improvements in identifying tax delinquents (Höglund, 2017; Lee & Kim, 2024).

Several articles discussed the use of technology in tax debt collection. Australia employs soft enforcement through phone calls (Millane & Stewart, 2019). New York's transition from face-to-face communication to call center usage doubled tax debt collection revenue in 10 years despite a 30% personnel cut (Miller et al., 2012). In Colombia, phone outreach improved collection effectiveness by 3.5 times (Mogollon et al., 2021). Brazil's automation of email and SMS notifications for tax payments increased compliance by 2.9% in 2020 (Labarrère et al., 2024). Additionally, a taxpayer account system is proposed to facilitate direct communication and payments to tax authorities (Millane & Stewart, 2019).

These findings underscore the importance of government investment in information systems and technology for effective tax debt collection.

Theme 6: Tax Delinquents' Reactions to Tax Debt Collection Measures

5 out of 28 articles are experimental research that shows how tax debt collection measures can influence the behavior of tax delinquents. The authors further categorize the theme into research concerning the substance of the message, the timing, and the personalization approach, as shown in Table 8.

Table 8. Subthemes of Tax Delinquents' Reaction to Tax Debt Collection Measures

Subthemes	References	Codes
1. Message Substance on Tax Debt Collection Measures	(Chirico et al., 2019; Hallsworth et al., 2017; Perez-Truglia & Troiano, 2018)	Minority Norm; Descriptive and Injunctive Norm; Moral and Public Service Framing; Penalties and Financial Information; Shaming Penalties Visibility; Things that Weaken Message Substance.
2. Tax Debt Collection Measures: Timing	(Gillitzer & Sinning, 2020)	Imperfect Memory; Optimal Timing; Early Reminders Speed Up Payments; Delivery Time Does Not Affect Tax Debt; Payment Ability Hinders Early Payment.
3. Personalized Tax Debt Collection	(Mogollon et al., 2021)	Personalized Measures to Increase Payment; Gap Between Commitment and Action; Things that Weaken Personalized Approach.

Some research on tax debt collection highlights the importance of message content directed at tax delinquents (Chirico et al., 2019; Hallsworth et al., 2017; Perez-Truglia & Troiano, 2018). Reminder letters framed with social norms, particularly labeling individuals as tax delinquents, effectively accelerate payments in the UK. Studies indicate no significant difference in the results between messages about tax funding for public services and those warning about how tax delinquency threatens these services. A UK replication experiment showed that combining descriptive and injunctive norms improved payment behavior (Hallsworth et al., 2017). In Philadelphia, letters mentioning economic sanctions notably increased payment rates, while public service messages did not outperform simple reminders (Chirico et al., 2019). A US study found that shaming penalties, particularly in Kentucky, Kansas, and Wisconsin, increased payments among low-tax debt owners, although factors like liquidity constraints and social perceptions can diminish responsiveness (Perez-Truglia & Troiano, 2018). Additionally, the effectiveness of message content decreases as tax debt size increases (Chirico et al., 2019; Hallsworth et al., 2017).

An Australian experiment investigated the best timing for tax debt collection measures, like sending reminder letters. It found that sending reminders earlier prompts quicker tax debt settlement, though the total amount settled does not change. Additionally, reminders were ineffective for taxpayers with high debts, indicating their limitations (Gillitzer & Sinning, 2020).

A study in Colombia examined how personal interactions, such as phone calls and appointments, affect tax debt collection. Professional bank callers randomly called tax delinquents to secure payment commitments or arrange meetings. Results indicated that phone calls boosted the likelihood of payment by about 27%, settlement by 7.8%, the portion of tax debt paid by 13.9%, and total costs by roughly 3.5 times. However, only 69% of those who agreed to meet attended, and just 39% of those who committed to pay followed through. Appointments increased payment likelihood by 13 to 16%, but the study noted that phone calls may be less effective for enterprise taxpayers (Mogollon et al., 2021).

Discussion

Figure 4 illustrates how the authors mapped the identified themes in tax debt collection research. The tax debt collection strategy became the central theme, connecting other identified themes, as almost all of the research articles related to tax debt collection strategies. However, many of them primarily focus on the first three stages of the strategy to push the payment of tax debt. Given the relative scarcity of research on the realistic recovery of tax debts, prioritizing the development of knowledge on tax debt recovery should be considered. Besides being a standalone theme, future research can also study the central theme along with other five themes.

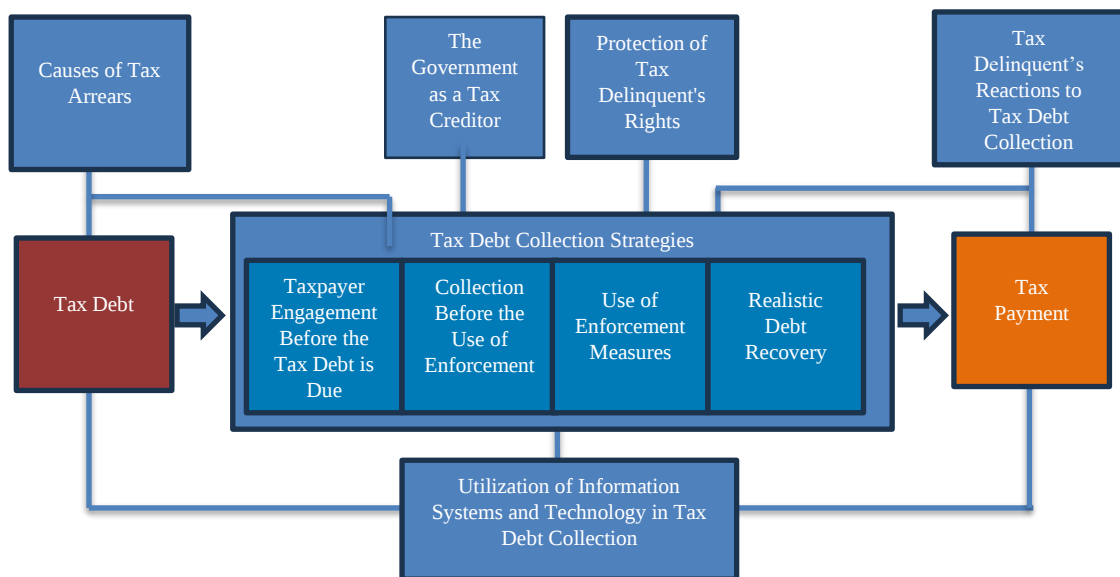


Figure 4. Theme of Tax Debt Collection Research's Mapping

It is possible to design research on tax debt collection to pinpoint the causes of tax debt. The outcome could support pre-due date tax debt collection strategies to prevent tax arrears. According to the analysis, government policies, economic situations, and taxpayer characteristics can induce tax arrears. Researchers can develop or renew their understanding of the triggers of tax arrears by considering the factors found in previous research. This allows us to uncover additional factors, confirm past findings, and adjust tax policies to prevent tax arrears requiring tax debt collection measures. One cause of tax debt is the tax assessment or audit policy, so future research could examine how changes in tax audit policy regulations at the tax authority affect overdue or uncollectible tax debt. Exploring other economic conditions and features of taxpayers in connection with other scenarios and conditions can also be done to see whether differences in the study background yield different results.

Tax debt collection research can also focus on using information systems and technology, including data analysis for decision-making, and technology in tax debt collection. The goal is to find predictive models for taxpayer payment failures and appropriate collection actions. Further research is necessary to develop more accurate data and models for predicting tax debt emergence and collection results. The exploration of data analysis for determining tax debt write-offs remains an untouched area of research. Also, technology research primarily focuses on phones, text messages, emails, and taxpayer accounts associated with pre-due tax debt collection strategies or actions. Further

exploration of other cutting-edge technologies and collection actions can make tax debt collection more effective and cheaper.

Tax debt collection research often discusses the government's role as a creditor, highlighting its unique treatment of tax debts. Previously, researchers conducted comparative legal research on tax debt priority, examining tax debt prioritization practices across countries and legislative changes. A new comparative study is necessary to update knowledge on current provisions and trends in tax debt priority regulations. Furthermore, policymakers must investigate the reality of tax debt prioritization in practice to determine the most beneficial policies for the government, society, and other tax delinquent creditors.

Previously, much research on government power focused on the role of third parties in tax debt collection. These parties can perform tax debt collection functions, sell tax lien rights, act as withholding tax agents, exchange credit information from tax delinquents, pay taxpayers' tax debt, or act as intermediaries in bankruptcy asset resolution. It can be beneficial to explore the potential benefits and drawbacks of implementing similar policies in Indonesia, given the absence of many of these practices. The government's advantages in tax debt collection, particularly in its discretionary decision-making, require further studies. Coordination of tax debt collection with other government-managed debt collection and how changes in the ruling party affect tax debt collection policies are also unexplored in Indonesia.

Tax debt collection research may focus on protecting delinquent taxpayers' rights through legal studies. Current discussions focus on provisions regarding discretion, disadvantages in tax debt collection, and legal remedies. A survey of officials' considerations when granting tax debt collection reliefs could help develop a more just and non-exploitative policy. Evaluating tax debt collection provisions that may harm vulnerable taxpayers can also be beneficial. Research on detrimental tax debt collection provisions has focused on seizing and selling confiscated goods at prices that do not reflect the fair market value. A similar evaluation of Indonesia's auction and sale process could determine if the selling prices of confiscated goods are adequate. Future research should identify sufficient measures for taxpayers to address excessive and detrimental tax debt collection practices.

Research on tax delinquents' reactions to collection measures by tax authorities is also crucial. Currently, studies use experimental methods to understand how measures' substance, timing, and personalization influence behavior in paying tax arrears. However, these studies are limited to non-coercive measures efforts like correspondence, phone calls, or meetings with taxpayers. Further research on the influence of harsher measures could complement existing knowledge about their effectiveness and how they can encourage delinquents to settle their debts.

CONCLUSION

According to the literature review, tax debt collection research is still scarce. After searching several research databases, the researchers discovered only 28 relevant tax debt collection research articles in SJR and/or ABDC-indexed journals from 1939 to 2024. The US tax debt collection practices dominated the topic of tax debt collection research. Tax debt collection research is multidisciplinary and employs a variety of methodologies. No Indonesian tax debt collection research article meets the author's criteria. These all suggest that tax debt collection holds significant research potential and is urgent for developing tax debt collection policy.

Based on the OECD's principles of tax debt management and other patterns found in the content of relevant tax debt collection research articles, the thematic analysis finds six themes that show up in tax debt collection research literature. The themes are "Causes of

Tax Arrears," "The Government as a Tax Debt Creditor," "Tax Debt Collection Strategies," "Protection of Tax Delinquent's Rights," "Utilization of Information Systems and Technology in Tax Debt Collection," and "Tax Delinquent's Reactions to Tax Debt Collection Measures." The theme "Tax Debt Collection Strategies" most frequently appears in the literature review, which renders developing tax debt collection research that focuses on one of the stages of collection actions within that theme recommendable. Under this theme, the authors note that there hasn't been extensive research on the realistic recovery of tax debts. Additionally, the authors identify new potential research on tax debt collection by linking the theme "Tax Debt Collection Strategy" with the other five themes. The authors' identified themes serve not only as a reference for other researchers to enhance the existing knowledge on tax debt collection, but also as crucial considerations for policymaking.

Based on these conclusions, the government needs to collect data and ensure easy access to information relevant to these six themes so that research on tax debt collection can be conducted by everyone, thereby obtaining useful knowledge to develop a more optimal tax debt collection implementation. The authors' use of the SJR or ABDC index and English writing as filters in this literature review could potentially exclude relevant tax debt collection research, especially those from Indonesia, from the discussion. The authors suggest conducting a literature review, using the SINTA index filters for quality assurance and writing in Indonesian, to delve into the emerging domestic tax debt collection research. Additionally, the author's limited access to some parts of databases may result in the exclusion of significant articles from the literature review.

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