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OPERATIONALIZING A DORMANT MANDATE: LEGAL, ECONOMIC, AND GOVERNANCE PATHWAYS TOWARD A ZAKAT-BASED TAX CREDIT POLICY IN ACEH, INDONESIA

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Abstract

Aceh occupies a unique constitutional position in Indonesia as the only province mandated to implement elements of Islamic law within a modern fiscal framework. Article 192 of Law Number 11 of 2006 concerning the Governing of Aceh (UUPA) explicitly stipulates that zakat paid by a taxpayer functions as a direct reduction of income tax payable—a tax credit mechanism—rather than merely a deduction from taxable income, as regulated nationally under Law Number 23 of 2011 concerning Zakat Management. Despite this explicit constitutional mandate, the provision has remained largely unimplemented for nearly two decades. This study employs a mixed-method approach combining normative-juridical legal analysis, illustrative economic simulation, and policy analysis—incorporating Zakat Digital Accounting as a key institutional variable—to examine why this implementation gap persists and how it may be resolved. The findings indicate that the primary obstacle is not the absence of legal basis, but the absence of technical implementing regulations that bridge Aceh's special autonomy with Indonesia's unified national tax administration system (Coretax), compounded by limited institutional capacity within Baitul Mal to digitize its zakat accounting and issue verifiable proof-of-payment documents. Illustrative economic simulation demonstrates that the tax credit mechanism yields financial benefits up to three to four times greater than the deduction mechanism for both individual and corporate taxpayers, an incentive that could substantially increase formal zakat compliance if implemented alongside adequate anti-fraud governance and a mature Zakat Digital Accounting infrastructure. The study recommends two parallel policy pathways: accelerating a Government Regulation that explicitly accommodates Aceh's special status, and establishing an interim Memorandum of Understanding among the Aceh Government, the Ministry of Finance, and Baitul Mal Aceh, supported by a four-phase implementation roadmap, prioritized Zakat Digital Accounting standardization, and a permanent joint oversight committee.

Keywords: Zakat; Tax Credit; Zakat Digital Accounting; Islamic Fiscal Policy; Special Autonomy; Aceh

INTRODUCTION

Aceh holds a unique constitutional position within the Indonesian legal system as the only province granted authority to organize social, communal, and state life on the basis of Islamic law (Syariat Islam). This special status is not merely symbolic; it constitutes a formal legal mandate rooted in the 2005 Helsinki Memorandum of Understanding and codified in Law Number 11 of 2006 concerning the Governing of Aceh (hereinafter UUPA). One of the least examined yet most consequential manifestations of this special autonomy concerns the fiscal treatment of zakat, the obligatory Islamic almsgiving that observant Muslim taxpayers must discharge annually. Faithful Muslim taxpayers in Aceh face what the literature terms a double duty: the religious obligation to pay zakat and the civic obligation to pay income tax, both levied on largely overlapping income bases (Djatmiko, 2019; Wijayanti, Amilahaq, Muthaher, Baharuddin, & Sallem, 2022). This dual burden is not merely administrative; cross-national evidence indicates that religiosity and institutional trust are among the strongest predictors of both charitable giving and tax morale, suggesting that how a state chooses to recognize religious financial obligations can materially shape citizens' broader compliance behavior (Ciziceno & Pizzuto, 2022; Wijaya, Hati, Ekaputra, & Kassim, 2024).

At the national level, Law Number 23 of 2011 concerning Zakat Management and the Income Tax Law (most recently amended by Law Number 7 of 2021 on Harmonization of Tax Regulations) treat zakat paid through an authorized amil zakat institution merely as a deduction from taxable income (tax deductible), a mechanism whose financial benefit to the taxpayer is limited to the marginal tax rate multiplied by the amount of zakat paid. UUPA, however, adopts a qualitatively different formulation. Article 192 of UUPA explicitly states that "zakat paid becomes a factor reducing the amount of income tax payable by the Taxpayer"—language that positions zakat as a direct reduction of tax liability itself (tax credit), rather than a reduction of the tax base. This distinction carries substantial financial consequences: under a tax credit mechanism, the taxpayer's benefit is equivalent to one hundred percent of the zakat paid (subject to a reasonable cap), compared with only a fraction of that amount under the deduction mechanism applied nationally.

Despite the clarity of this constitutional mandate, Article 192 of UUPA has remained substantially dormant for nearly two decades. Recent policy developments suggest renewed momentum: since 2023 the Ministry of Finance has reportedly initiated the drafting of a Government Regulation (RPP) concerning zakat as a tax-reducing factor, while the Aceh House of Representatives (DPRA) has urged the Aceh Government to form a dedicated advocacy team to press for the provision's implementation. At the time of writing (2026), the House of Representatives' Legislative Body has also approved the drafting of amendments to UUPA itself, presenting a window of opportunity that, if left unaddressed, risks perpetuating a pattern of dormant special-autonomy provisions.

This persistent implementation gap raises a research problem of both theoretical and practical significance: why has a facially unambiguous constitutional mandate remained unimplemented for so long, and what legal, economic, and institutional conditions must be satisfied to operationalize it? Prior scholarship has examined the legal disharmony between UUPA and national zakat regulation (Faisal, Mukhlis, Jamaluddin, Manfarisyah, & Maghfirah, 2023; Izzati, Musa, & Ajalil, 2026) and has compared Indonesia's deduction-based approach unfavorably with Malaysia's more generous zakat rebate scheme (Nugraha, Refmasari, & Fatriansyah, 2021; Wijayanti et al., 2022). The broader public-finance literature further indicates that voluntary tax compliance is shaped less by enforcement alone than by perceived fairness, institutional transparency, and trust in government (Hsu, 2024; Mebratu, 2024), while empirical evidence on tax-incentivized charitable giving demonstrates that well-designed fiscal incentives can meaningfully increase voluntary contributions when properly integrated into a state's tax architecture (Duquette, 2016). However, relatively little research has integrated legal analysis, economic simulation, and institutional governance considerations into a single, policy-actionable framework specific to Aceh. Accordingly, this study aims to examine the legal foundation and regulatory disharmony surrounding zakat as a tax credit in Aceh, to illustrate the comparative financial impact of the tax credit mechanism relative to the deduction mechanism, to identify the principal governance and implementation risks, and to propose a realistic policy roadmap toward operationalizing Article 192 of UUPA.

METHOD

This study adopts a mixed-method policy research design combining three complementary approaches. First, a normative-juridical legal analysis was conducted by examining primary legal materials—UUPA, Law Number 23 of 2011 concerning Zakat Management, the Income Tax Law and its implementing regulations, Government Regulation Number 60 of 2010, and Qanun Aceh Number 10 of 2018 concerning Baitul Mal—to identify the precise textual basis and scope of Article 192 of UUPA and to map points of disharmony with national-level regulation. Secondary legal literature, comprising peer-reviewed journal articles indexed in reputable international databases, was used to corroborate and contextualize the legal findings.

Second, an illustrative economic simulation was constructed to compare the financial impact of the tax deduction mechanism currently applied nationally with the tax credit mechanism mandated by Article 192 of UUPA. The simulation uses hypothetical taxpayer profiles across a range of taxable income levels, applying Indonesia's progressive income tax brackets and a standard zakat rate of 2.5 percent of annual income, consistent with the prevailing nisab and haul requirements in Islamic jurisprudence. This simulation is descriptive and illustrative in nature, intended to demonstrate the order of magnitude of the financial incentive differential rather than to provide a precise macro-fiscal revenue projection, since population-level taxpayer and zakat-compliance data for Aceh are not publicly available.

Third, a policy analysis approach was used to examine institutional dynamics, stakeholder interests, and governance risks associated with implementation, drawing on official government communications, news reporting from relevant institutions (the Directorate General of Taxes, Baitul Mal Aceh, and the Aceh House of Representatives), and comparative experience from other Muslim-majority jurisdictions (Malaysia, Brunei Darussalam, Sudan, Pakistan, and northern Nigeria). The analytical framework for the digital-integration dimension

of this policy analysis draws on the systematic digital-tax-administration literature, which identifies interoperability, data governance, and taxpayer-facing service design as recurring preconditions for successful e-government tax reform (Bassey, Mulligan, & Ojo, 2022). Cross-country evidence further shows that digital instruments such as e-invoicing and automated third-party data matching can materially improve tax-compliance verification, while ICT-enabled taxpayer engagement has been shown to shift compliance behavior even in resource-constrained administrative settings, supporting the plausibility of a similarly technology-enabled verification pathway for zakat payments in Aceh (Kotsogiannis, Salvadori, Karangwa, & Murasi, 2025; Mascagni, Mengistu, & Woldeyes, 2021). Data triangulation across these three analytical strands allows the study to move from doctrinal legal description toward actionable, phased policy recommendations.

Fourth, this study introduces Zakat Digital Accounting as a distinct analytical variable connecting the legal and economic dimensions examined above to their practical implementation. Zakat Digital Accounting is operationalized as the extent to which a zakat institution's financial recording and reporting practices are digitized, standardized, and interoperable with external verification systems, assessed along four dimensions: (a) compliance with PSAK 109 fund-accounting principles, which require zakat funds to be recorded and reported separately from an institution's own assets; (b) the existence of a real-time, auditable digital ledger for zakat receipts and disbursements; (c) the capacity to issue a uniquely identifiable, machine-verifiable proof of payment (e-BSZ) for each transaction; and (d) technical interoperability with the Directorate General of Taxes' Coretax platform through a secure application programming interface. Within the conceptual framework of this study, Zakat Digital Accounting functions as the institutional enabler linking the legal mandate of Article 192 of UUPA (input) to the economic incentive created by the tax credit mechanism (throughput) and its verifiable application in a taxpayer's annual return (output). The design of the real-time, auditable ledger dimension draws on the broader digital-accounting literature, which documents how distributed-ledger and interoperable digital-accounting architectures can enhance the auditability and verifiability of financial records in both corporate and public-interest settings (Secinaro, Dal Mas, Brescia, & Calandra, 2022), while cross-country evidence on tax-administration digitalization shows that interoperable digital platforms can drive broader institutional digital transformation among the entities that interact with them, a dynamic this study expects to extend to Baitul Mal offices that integrate with Coretax (Xi & Ling, 2025). Evidence on this variable was drawn from Baitul Mal's publicly available financial reports, PSAK 109 technical guidance, and prior studies on zakat institution digitalization (Cholili, Setiawan, Kholis, Samsuri, & Muslih, 2026; Mani, Isman, & Budiman, 2025).

RESULTS AND DISCUSSION

Legal Basis and the Disharmony between National and Aceh-Specific Regulation

As a matter of legal hierarchy, UUPA functions as a lex specialis relative to the general national regulation of zakat and income tax. The principle of lex specialis derogat legi generali—that a specific provision overrides a general provision governing the same subject matter—is the central legal argument advanced by the Aceh House of Representatives and legal scholars alike in asserting Aceh's right to apply the tax credit mechanism despite contrary national arrangements (Faisal et al., 2023). Table 1 summarizes the principal points of disharmony between the two regulatory regimes.

Table 1. Comparison between the National Zakat-Tax Mechanism and Aceh's Article 192 UUPA Mandate

Aspect	National Mechanism (Law No. 23/2011 & Income Tax Law)	Aceh Mechanism (Article 192, UUPA)
Legal basis	Law Number 23 of 2011; Government Regulation No. 60/2010	Law Number 11 of 2006 (UUPA), Article 192
Point of reduction	Taxable income (tax base)	Income tax payable (tax liability)
Mechanism type	Tax deduction	Tax credit
Taxpayer benefit	Marginal tax rate × zakat paid	Up to 100% of zakat paid (subject to a cap)
Implementation status	Operational nationwide	Enacted since 2006 but not yet operationalized

The persistence of this disharmony for nearly two decades is best explained not by an absence of legal validity—Article 192 of UUPA remains a valid and binding provision—but by the absence of technical implementing regulations at the central government level that would reconcile Aceh's special mechanism with the unified national tax administration system now being consolidated under the Directorate General of Taxes' Coretax platform (Izzati

et al., 2026). This is consistent with the broader concept of an implementation gap in public policy studies: the distance between a legal norm as enacted (das sollen) and its practical operationalization (das sein). This tension mirrors a wider pattern documented in Indonesia's fiscal decentralization architecture, where asymmetric special-autonomy arrangements are frequently granted in statute but left dependent on central-government implementing regulations that may lag for years, undermining the practical value of regional fiscal privileges (Lewis, 2023). This pattern is consistent with cross-country evidence showing that the economic-growth benefits of fiscal decentralization materialize only when decentralized authority is matched by adequate implementing capacity and clear intergovernmental coordination mechanisms, rather than by the formal transfer of authority alone (Canavire-Bacarreza, Martinez-Vazquez, & Yedgenov, 2020).

Comparative Perspectives from Other Muslim-Majority Jurisdictions

Aceh's predicament is not without international parallel. Malaysia applies a zakat rebate scheme that is, in substance, equivalent to a tax credit, and comparative evidence suggests that this scheme is associated with higher tax compliance than Indonesia's deduction-based approach (Wijayanti et al., 2022; Nugraha et al., 2021). Brunei Darussalam, which levies no personal income tax, does not face an analogous double-duty problem. Sudan and Pakistan historically experimented with compulsory state-collected zakat deducted directly from bank accounts, an approach that generated resistance due to its erosion of the voluntary character of zakat as an act of worship. Northern Nigerian states operating under Sharia law within a secular federal system offer perhaps the closest structural analogy to Aceh: sub-national religious autonomy operating alongside a national fiscal system that does not itself adopt a religious character. Aceh's task is therefore to chart a middle path between Malaysia's voluntary-incentive model and Nigeria's sub-national autonomy context, within Indonesia's unitary state framework.

Evidence from the wider Organization of Islamic Cooperation (OIC) bloc reinforces the view that the strength of national governance and regulatory quality—not the presence of Sharia principles per se—determines how effectively Sharia-based financial obligations translate into real economic outcomes (Chen & Yu, 2023; Ulussever, Doruk, Ertuğrul, & Tekdoğan, 2025). Cross-national survey evidence from the MENA region similarly shows that voluntary religious giving is highly sensitive to institutional trust and the perceived legitimacy of the collecting body, a finding directly transferable to the question of whether Acehnese taxpayers will route zakat through Baitul Mal rather than informal channels (Khaled, Lievens, & Hustinx, 2026). Notably, a recent study conducted specifically among respondents in Aceh found that religiosity significantly moderates the relationship between value orientations and humanitarian donation intentions, lending direct local support to the assumption that formalizing and incentivizing zakat payment through recognized institutions can shift giving behavior toward official channels (Majid et al., 2026). More broadly, comparative evidence on Sharia-compliant firms across Muslim-majority jurisdictions shows that adherence to Islamic financial principles is associated with distinct, generally more conservative financial structures relative to conventional firms, without undermining firm-level financial soundness (Rashid, Nur Khoirunnisaa Pg Hj Johari, & Izadi, 2023), lending further plausibility to the claim that a well-governed zakat-tax credit mechanism could strengthen, rather than destabilize, Indonesia's formal fiscal system.

Economic Simulation: Tax Credit versus Tax Deduction

To illustrate the financial stakes of this policy choice, Table 2 presents an illustrative simulation comparing the deduction and credit mechanisms across a range of taxable income levels, assuming zakat paid at the standard rate of 2.5 percent of annual income.

Table 2. Illustrative Comparison of Taxpayer Benefit under Deduction versus Tax Credit Mechanisms

Annual Taxable Income	Zakat (2.5%)	Deduction Benefit	Tax Credit Benefit
IDR 100 million	IDR 2.5 million	IDR 375 thousand	IDR 2.5 million
IDR 300 million	IDR 7.5 million	IDR 1.9 million	IDR 7.5 million
IDR 600 million	IDR 15 million	IDR 4.5 million	IDR 15 million
IDR 1 billion	IDR 25 million	IDR 7.5 million	IDR 25 million

The simulation demonstrates that the absolute benefit differential between the two mechanisms widens substantially as income rises, with the tax credit mechanism yielding a benefit three to four times greater than the deduction mechanism across the income levels examined. This finding is illustrative rather than a precise macro-fiscal forecast, since it does not draw on Aceh's actual taxpayer population data; nevertheless, it demonstrates clearly why the deduction mechanism, despite already being legally available nationwide, is claimed by only a small fraction of eligible taxpayers—the financial incentive is simply too modest to justify the administrative effort of claiming it.

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A tax credit of this magnitude, by contrast, could plausibly generate a meaningful "single reporting effect," whereby taxpayers are incentivized to report both zakat and income more accurately through formal channels.

It is important to note that the benefit distribution under a pure tax credit mechanism scales with income in absolute terms, which raises a distributive policy question: without a reasonable cap on the creditable amount, the greatest absolute benefit would accrue to higher-income taxpayers. This underscores the importance of pairing the tax credit mechanism with a non-refundable cap, ensuring fiscal sustainability while preserving proportional fairness across income groups.

Zakat Digital Accounting: Integration and Verification Mechanisms

As defined in the Method section, Zakat Digital Accounting is treated in this study as the institutional enabler that determines whether the legal mandate of Article 192 of UUPA and the economic incentive of the tax credit mechanism can be translated into a verifiable transaction that tax authorities are willing to accept. Operationalizing the tax credit mechanism requires that zakat payments be independently verifiable by tax authorities. This study proposes a conceptual digital proof-of-payment framework (electronic Bukti Setor Zakat, or e-BSZ), whereby Baitul Mal's payment records—maintained in accordance with Statement of Financial Accounting Standards (PSAK) 109 on Zakat and Infaq/Sadaqah Accounting, which mandates fund accounting principles that keep zakat funds strictly segregated from Baitul Mal's own institutional assets—are synchronized in real time with the Directorate General of Taxes' Coretax system through a secure application programming interface. Under this framework, a taxpayer would reference a unique e-BSZ code when filing an annual tax return, allowing automatic verification against Baitul Mal's records before the credit is applied. Such integration addresses one of the central technical objections raised by tax authorities: the difficulty of verifying zakat payment claims at scale without a standardized, auditable digital trail (Cholili, Setiawan, Kholis, Samsuri, & Muslih, 2026; Mani, Isman, & Budiman, 2025).

The maturity of Zakat Digital Accounting across Aceh's Baitul Mal network is currently uneven: institutions at the provincial level (Baitul Mal Aceh) generally maintain more standardized digital bookkeeping than district- and municipal-level offices (Baitul Mal Kabupaten/Kota), many of which still rely substantially on manual or semi-digital recording. This unevenness has direct implications for the tax credit mechanism's feasibility, since a taxpayer's e-BSZ can only be automatically verified by Coretax if the issuing Baitul Mal office's accounting system meets a minimum digital-integration threshold. Consequently, this study treats Zakat Digital Accounting readiness as a necessary precondition—rather than a parallel or optional track—for each phase of the implementation roadmap discussed later in this article, and recommends that provincial-level digital accounting standardization be prioritized before the tax credit mechanism is extended to district-level pilot sites.

This concern is far from unique to zakat administration. Emerging research on artificial-intelligence-assisted tax administration cautions that automated verification systems must be designed to balance fraud-detection efficiency against taxpayer rights and due process, a balance equally relevant to the design of an automated e-BSZ cross-matching system (Guglyuvatyy, 2025). At the same time, Indonesia's own experience combating tax-related crime illustrates that enforcement technology alone is insufficient without accompanying institutional reform and inter-agency data-sharing arrangements between the Directorate General of Taxes and other public bodies—precisely the kind of arrangement this study proposes between Coretax and Baitul Mal (Nurferyanto & Takahashi, 2024).

Governance Risks and Implementation Challenges

Implementing a tax credit mechanism introduces governance risks that do not arise, or arise less acutely, under the current deduction mechanism, since the financial incentive to misreport is considerably larger. Table 3 summarizes the principal risks identified through this study's policy analysis, together with their likelihood, potential impact, and proposed mitigation strategies.

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Table 3. Implementation Risk Matrix for Zakat as a Tax Credit in Aceh

Risk	Likelihood	Impact	Primary Mitigation
Fraudulent or collusive zakat claims	Medium	High	Forensic audit; digital cross-matching
Delay in national implementing regulation	High	High	Active advocacy; interim MoU pathway
Infrastructure gap across local Baitul Mal offices	High	Medium	Phased interoperability; QR-based interim verification
Low taxpayer literacy	High	Medium	Segmented public education campaigns
Inconsistent application across tax offices	Medium	Medium	Centralized SOP; staff training

Among these risks, the delay in national-level implementing regulation is assessed as carrying both the highest likelihood and the highest impact, yet it is largely outside the direct control of Aceh's own institutions. This asymmetry suggests that political advocacy toward the central government must proceed in parallel with, rather than sequentially after, the Aceh-level institutional strengthening measures (infrastructure, staff capacity, and public literacy) that fall within local control and can begin immediately (Prakoso & Widiastuti, 2025; Bin-Nashwan, 2026). Cross-national evidence on tax evasion further indicates that both institutional-environment quality and religiosity jointly shape compliance behavior, with weak institutions capable of eroding the compliance-enhancing effect of religiosity itself (Ben Othman, Hussainey, & Moumen, 2024), while research on religious institutions in Pakistan shows that the credibility of religious-financial bodies can materially shape individual economic behavior, reinforcing the importance of Baitul Mal's institutional credibility to the success of this reform (Disli & Hamza, 2024).

From a public-sector governance standpoint, comparative evidence on bureaucratic quality shows that higher-quality public administration is consistently associated with stronger tax-revenue mobilization, suggesting that the success of a zakat-tax credit mechanism will depend as much on the administrative competence of the implementing agencies as on the underlying policy design itself (Appiah et al., 2025). In parallel, evidence from Islamic fintech and poverty-alleviation research suggests that digital and nontraditional financial channels can meaningfully extend the reach of formal financial and social-welfare systems to previously underserved populations, offering a complementary technological pathway for expanding Baitul Mal's digital verification capacity beyond urban centers (Mohammed, Al-Saif, Grada, Alaswadi, & Bamahros, 2025).

The governance risk of fraudulent or collusive zakat claims identified in Table 3 is not unique to this context. Rigorous evidence from public-sector audits shows that exposing the results of government audits to the public can substantially reduce corrupt behavior among local officials, supporting this study's recommendation that the proposed Joint Committee for Zakat-Tax Oversight publish regular, accessible audit findings rather than treating oversight as an internal administrative matter alone (Avis, Ferraz, & Finan, 2018). Complementary research on the quality of institutional frameworks similarly finds that the strength of a jurisdiction's auditing and public-accountability institutions is a stronger predictor of corruption outcomes than the mere existence of anti-corruption rules on paper, reinforcing the importance of embedding Zakat Digital Accounting verification within a credible, independently auditable institutional structure rather than relying on the e-BSZ mechanism alone (Nonki Tadida, 2023). The reputational stakes of failing to manage this risk are considerable: systematic evidence from the nonprofit and charitable sector shows that publicized fraud or governance scandals can materially damage an organization's standing and depress future voluntary contributions (Chapman, Hornsey, Gillespie, & Lockey, 2023), while donors have been shown to respond distinctly—and not always negatively—when an organization proactively discloses and addresses fraud rather than concealing it, a pattern with direct implications for how Baitul Mal should communicate audit findings under the proposed roadmap (Harris, Petrovits, & Yetman, 2024).

Policy Recommendations and Strategic Roadmap

Building on the preceding analysis, this study recommends two parallel policy pathways rather than a single sequential one. The first pathway is the acceleration of a national Government Regulation (RPP) on zakat as a tax-reducing factor, with an explicit clause accommodating Aceh's special status under Article 192 of UUPA. The second, interim pathway is a Memorandum of Understanding (MoU) among the Aceh Government, the Ministry of Finance, and Baitul Mal Aceh, allowing a limited-scope pilot implementation to proceed while the national regulation remains in process. This dual-track approach reduces Aceh's dependence on a single, centrally controlled legislative timeline.

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Operationally, a four-phase implementation roadmap spanning approximately four years is proposed: Phase 1 focuses on institutional readiness and system auditing; Phase 2 introduces a limited pilot among a small cohort of taxpayers with rigorous verification; Phase 3 expands the pilot while addressing audit findings; and Phase 4 extends the mechanism province-wide. Throughout all four phases, a permanent Joint Committee for Zakat-Tax Oversight in Aceh, comprising representatives of the Aceh Government, the regional office of the Directorate General of Taxes, Baitul Mal, the Aceh House of Representatives, and the Ulama Consultative Assembly, would serve as the standing coordination and dispute-resolution body, supported by tiered monthly, quarterly, and annual monitoring and evaluation cycles.

The design of each phase can further draw on recent methodological advances in zakat-program evaluation. Work developing and validating behavioral conditionalities for zakat-based cash-transfer programs demonstrates that clearly specified, measurable behavioral indicators can be embedded into zakat-institution program design and rigorously validated prior to full rollout (Esa, Wahid, & Yaacob, 2026)—an approach directly applicable to structuring the verification criteria and success indicators used within each phase of the proposed Aceh roadmap.

CONCLUSION

This study concludes that the near two-decade dormancy of Article 192 of UUPA is attributable not to any deficiency in its legal validity, but to the absence of technical implementing regulations reconciling Aceh's special fiscal-religious mandate with Indonesia's unified national tax administration system, compounded by limited institutional capacity within Baitul Mal to issue independently verifiable proof of zakat payment. The analysis identifies Zakat Digital Accounting, understood as the extent of digitization, standardization, and interoperability of zakat financial recording and reporting practices, as the institutional variable that connects this legal mandate to its practical realization: without a PSAK 109-compliant, auditable digital ledger capable of issuing a unique machine-verifiable e-BSZ and interoperating with the Directorate General of Taxes' Coretax platform, the tax credit mechanism cannot be safely operationalized regardless of its legal validity. Illustrative economic simulation confirms that the tax credit mechanism mandated by UUPA offers substantially greater financial benefit to taxpayers than the deduction mechanism applied nationally, an incentive structure that, if implemented with adequate anti-fraud governance, a mature Zakat Digital Accounting infrastructure, and a reasonable benefit cap, could meaningfully increase both zakat and tax compliance simultaneously through a single reporting effect.

The study is not without limitations. The economic simulation is illustrative rather than based on Aceh's actual taxpayer population data, which are not publicly available; the comparative international analysis relies on secondary literature rather than field research in the comparator jurisdictions; and the study was conducted while a legislative revision of UUPA itself remained in progress, meaning some recommendations may require revisiting once that revision is finalized. Future research employing econometric modeling with real taxpayer and zakat-compliance data, together with field surveys of taxpayers, amil, and tax officials in Aceh, would substantially strengthen the evidentiary basis for the policy recommendations advanced here. Notwithstanding these limitations, the study offers a policy-actionable synthesis of legal, economic, and governance considerations that may assist Aceh's policymakers, together with the Ministry of Finance and Baitul Mal, in finally operationalizing a constitutional mandate that has waited nearly twenty years to be fulfilled.

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