Ways to improve tax risk assessment and management mechanisms in the control of taxpayers in the examination of counterparties

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ABSTRACT

The article states that tax authorities can improve their ability to detect possible tax evasion, ensure fair and equitable taxation, and ultimately contribute to the overall efficiency of the tax system by improving the practice of monitoring counterparties and taxpayers' activities. In the conditions of the new Uzbekistan, along with the measures aimed at increasing the volume of production based on the stimulation of taxpayers' activities, a wide emphasis is placed on the effective implementation of practical measures aimed at reducing the state budget losses through the optimal assessment of tax risks arising in them. In addition, the tax system of our republic is explained by the fact that, on the one hand, it can be used in the implementation of special scientific researches and in the creation of scientific and educational literature related to the assessment and management of tax risks related to the tax payers and the resulting tax risks related to the state budget. One of the characteristics of economic risks is that they are based on risk. Risks always cross interests, which do not correspond to the main interests of those who conduct economic activity. In addition, another sign that reveals the essence of economic risks is that it is always unstable, in this respect it is necessary to evaluate it, and this is its important sign. Economic risks make it difficult for those who carry out economic activities (legal entities and individuals) to achieve their goals, which indicates its extreme complexity, therefore, it evaluates the optimality of their economic decisions, which represent important signs of economic risk.

Keywords:	tax, budget policy, budget, tax administration, checking of counterparties, monitoring, activity, taxpayers, business entities, tax reporting, tax revenues, tax benefits, tax rate

Enter. In the global practice of the development trends of taxation, one can see general processes aimed at strengthening the practice of fair taxation. In addition to strengthening the stable system of attracting tax revenues to the state budget, an integral part of this process is assessing the risks of not receiving the specified amount of tax revenues in the budget, determining its reasons, and improving the work in this regard both theoretically and practically. According to the analyzes of the International Monetary Fund, in the conditions of extremely high uncertainty in the world due to the consequences of the COVID-19 pandemic, there were differences between the situation in the financial markets and the development of the real economy, on the other hand, uncertainties in the economic activities of tax-paying enterprises and their taxes In addition to increasing the risks of default, the country's budgets have been greatly damaged, and other financial system weaknesses have been exacerbated. As at various stages of society's development, there is always a need for

scientific research aimed at reducing the impact of negative economic consequences related to tax risk, reducing damage to the budget during its optimal assessment, scientific research areas related to tax risk research contribution is increasing. By improving counterparty audit and taxpayer monitoring practices, tax authorities can increase their ability to detect potential tax evasion, ensure fair and equitable taxation, and ultimately contribute to the overall efficiency of the tax system.

2. Review of literature.

Let us dwell in detail on the definitions given in the control of the activities of the main studied taxpayers within the scope of the topic.

L. I. Kofler Y. P. Kashirinalar considers tax control to be an effective mechanism implemented through tax audits as an important condition for the operation of the tax system. In the approach of these scientists, "tax audit is an economic mechanism of the tax authority over the correct calculation, timely and complete payment (transfer) of taxes and other mandatory payments to the budget, in this process the real data obtained as a result of tax control is compared with the data of the tax declaration submitted to the tax authorities. [1]. Scientific views of N. Shestakova are very important in this regard. This scientist defines tax control as: "a set of special, profile actions of competent state bodies in the field of control over the implementation of tax legislation, including techniques and methods that allow checking compliance with tax discipline, determining the maximum number of tax violations and taking preventive measures" [2] . Risk management process (Compliance Risk Management process): A systematic process of systematically identifying, evaluating, classifying and treating tax compliance risks[3]. Z.N.Kurbanov, Sh.N.Gaffarov in their research: "In the new version of the Tax Code, a new procedure for tax control is being introduced, which allows tax authorities to carry out on-the-spot inspections and tax audits on the basis of an analysis program without agreement with the competent authority. gives the right to increase" [4]. The variety of economic processes determines the variety of types of economic risks. Using the criteria of grouping into the field

of economic activity, they identify commercial, financial, banking, insurance risks, etc. Nowadays, in scientific and practical activities, they began to talk more about tax risks as economic risks independently. The authors of the work are both economists and lawyers [5]. A.K. Pokrovsky suggests the structural characteristics of risk for consideration: risk, risk propensity, risk sensitivity (vulnerability), interaction with other risks, available information about risk, amount of risk, costs (costs) associated with risk, specificity of risks [6]. I.O.Loginova classifies the types of enterprise risks according to the spheres of economic activity, emphasizes the risks associated with the external and internal environment of the enterprise. Economic, political, ecological, market, industrial risks of the external environment; internal environmental risks - production, management, marketing and logistics, financial, investment, innovation, environmental and economic[7]. In particular, the Swedish economist K. F. Becker emphasized the uniqueness of the secret economy, that the informal economy is an uncontrollable part of the market economy, and stated that they produce goods and provide services based on other forms of incentives [8].

3. Research methodology.

In the writing of the article, an inductive direction was chosen, and an attempt was made to reveal the problem through dialectical, analytical, logical, and historic methods of scientific knowledge. The research problem is set by observing the general conditions existing in enterprises. The necessary information for the research was mainly obtained from foreign literature.

4. Analysis and discussion of results.

Decree No. PF-5490 of the President of the Republic of Uzbekistan dated July 27, 2018 "On measures to further improve the system of protection of the rights and legal interests of business entities" and the Decree of the President of the Republic of Uzbekistan dated July 10, 2019 In the "Tax Administration Improvement Strategy" approved by Decision PQ-4389 "On Additional Measures to Improve Tax Administration" "modern methods of risk assessment, taking into account the experience

of foreign countries" introduction and reduction of the scope of secret circulation and uncontrolled income in the field of economic activity, assistance in the exit (legalization) of persons who carry out activities outside the field of tax legislation from the informal sector, introduction of a modern system of risk analysis and management in the implementation of control activities, tax A number of strategic tasks such as introducing the most optimal model of state tax service bodies based on the segmentation of payers, introducing a modern business analysis (Business Intelligence) system, as well as strategic and procedural management in tax service bodies.

Within the framework of our research work, in the tax system of Uzbekistan, although there are new mechanisms, there are also a number of problems related to tax risk and its assessment and management, the scientific and practical proposals for their solution are of great scientific importance today. In addition, there is a great need to improve the effectiveness of existing mechanisms. We will talk about these issues below.

First of all, if we comment on the existing problems in this regard, the first one is the problem of the complexity of determining the tax risk of taxpayers and the enterprises whose activities are important. In our opinion, it is necessary to increase the effectiveness of the identification of economic entities that have carried out suspicious operations in the field of the secret economy and the application of measures of influence against them. putting an end to its activity and not fully using the powers given to tax authorities.

In our opinion, in order to implement this process, it is necessary to clarify the concepts of suspicious operation and suspicious enterprises. Based on the content of the process, we developed our own definition of these concepts. That is, a suspicious operation is the fact that the formalized electronic account of taxpayers (tax agents) does not correspond to the nature and type of business entity's activity, as well as the nomenclature of goods (works, services) to be purchased and realized. , with the fact that the main goal of the taxpayer in concluding the transaction is not to pay taxes,

and the obligation under the transaction (operation) is performed by a person who is not a party to the contract or by a person who is not charged with the contract or law. If explained, we believe that the term "suspicious enterprise" should be understood as the subjects whose sole or primary purpose is to obtain unjustified tax benefits in the form of tax evasion or to reduce the amount of taxes that they pay.

In our opinion, it is necessary to obtain, process and analyze information from external sources by the relevant department of the State Tax Committee (the department of information and communication technologies) to identify suspicious operations and enterprises that implement them.

As a result of the analysis, it is necessary to determine whether business entities have carried out suspicious operations based on an algorithm that includes the following steps:

The first stage: the fact that the formalized electronic account of taxpayers (tax agents) does not correspond to the nature and type of business entity's activity of invoices and/or bank operations, as well as the nomenclature of purchased and realized goods (works, services), tax payment that the main purpose of the transaction is not to pay value added tax or to take it into account, and the obligation to perform the transaction (operation) is a person who is not a party to the contract, or the obligation to perform the transaction (operation) is a contract or a law to determine that it was performed by a person who was not charged;

Second stage: In the case of suspicious circumstances in the activity of the entities identified as a result of the analytical work, i.e., entities with goods imbalance (EHF and large bank turnover), dividing into three categories based on the amount of potential tax risk in relation to the turnover of goods;

The third stage: The cameral submits the results of the analysis and other documents to the tax inspection department of the entities whose activities have been found to have an imbalance of goods, and through the program, sending an order on the appointment of a cameral tax inspection and determining the quotas of the entities included in the list of suspicious

enterprises. In them, a task is sent to the regional tax offices for conducting tax audits and summarizing the data;

Fourth stage: If the activity is found to be suspicious, segment it through the risk analysis program and submit it to the Department of Risk Analysis and Taxpayer Segmentation to include the "suspicious" enterprises in the "due diligence" official web page of the Tax committee;

Fifth stage: If the activity is considered suspicious, submit the data to the department of risk analysis and taxpayer segmentation in the prescribed manner;

Sixth stage: study of the specified legal address of the newly established entities by the service structures of the regional tax authorities and submission to the department for dealing with tax offenses;

Seventh step: If the activity is found to be suspicious, segment it through the risk analysis program and submit it to the Department of Risk Analysis and Taxpayer Segmentation to include the "suspicious" enterprises on the "due diligence" official web page of the Tax committee.

In this process, the percentage of suspicious transactions in the activity (during the last 12 months) is high (>60%), the percentage of suspicious transactions in the activity (during the last 12 months) is up to 30-60%, non-payment of taxes calculated as a result of tax audits on time, early bankruptcy leadership or founding (participation) by a person who is a leader or founder (participant) in an organization declared has been implemented, there is no sufficient material and technical base for the implementation of economic activities (warehouse, vehicles, construction equipment, etc.), the taxpayer has a tax debt and a taxpayer who has carried out dubious operations has joined, from the period of the beginning of the activity , we believe that it is necessary to pay special attention to such criteria as it has understated the number of officially employed employees by carrying out a large turnover of goods in a short period of time.

In the tax system of Uzbekistan, the problem of the non-existence of a single methodology of tax risk management or the problem of existing ones not being interconnected is considered one of the important issues in this regard. Based on this, we offer a "tax risk management methodology".

Each of these blocks consists of several important criterion elements, the evaluation of which provides the working mechanism of this model. The scientific and practical significance of this model is that the state in its tax policy, in ensuring the effectiveness of the management elements within the framework of the tax administration, interrelates important block factors that negatively affect the uniform arrival of tax revenues to the state budget aimed at the main goal. It leads to effectiveness through evaluation based on consistency and systematicity.

"Tax risk management methodology" and "Systematic model for determining tax risk in the tax system" of the Cabinet of Ministers of the Republic of Uzbekistan dated January 7, 2021 No. 1 "tax risk management, tax risk taxpayers (tax agents)" developed as part of the research work was reflected in the decision "On the organization and conduct of tax audits".).On the one hand, these proposals served to assess the tax risks that arise in the taxpayer, and on the other hand, they created an opportunity to assess and reduce the risk of tax failure within the state budget.

As we mentioned in the previous paragraphs of our research work (mainly in Chapter 1), the segmentation of tax payers' activities in terms of tax risk is methodologically important. If the segmentation is set up and implemented correctly, it increases the objectivity of determining the tax risk. Therefore, activity segmentation is the first important stage of tax risk identification and management.

We know that in world practice, the "FeedBack" system is widely used in the management of tax risk based on the national characteristics of each country. The concept of "FeedBack" is an English term that essentially means "feedback", which actually originated more in technical and engineering systems. We believe that the use of this system will be very effective in managing tax risk. Although strategic plans have been made for the use of the "FeedBack" system in tax risk management in the tax system of

Uzbekistan, this system has not yet been implemented in practice. For this reason, we explain our scientific recommendations regarding the implementation of the mechanism of using this system.

The use of the "FeedBack" system in tax risk management requires a review of the processes that affect the assessment of tax risk. The source of the implementation of this system should be considered the data of the "tax audit" software product.

The procedure for forming candidates in the "Feedback" system should be implemented as follows:

First, this process consists of parts and is carried out by an employee attached to the criteria:

- evaluation of the effectiveness of existing criteria
- assessment of newly identified tax risks during the audit

It is carried out in criteria where "Criteria efficiency is below the specified percentage". At the end of the "Feedback", the employee will draw up a summary in the form specified by the employee, and the following will be clarified in this summary:

1. Making appropriate changes to the criteria.
2. There is no error in the criterion.
3. Amending regulatory legal documents.

The process of assessing newly identified tax risks in the audit is carried out in cases where there is a "new situation". The conclusion on the evaluation of the effectiveness of the existing criteria is formalized by the employee who conducted the "Feedback" for each criterion every month on the specified date of the following month and is included in the working group with the signature of the Director of the Department. The conclusion on the assessment of newly identified tax risks during the inspection is drawn up for each region by the employee who conducted the "Feedback" every month on the specified date of the next month and is included in the working group with the signature of the Director of the Department.

In this case, every conclusion expressed by the working group is stored in the system. Preliminary conclusions drawn up for each case by the employee who conducted "Feedback" are stored in the system. The set date will be confirmed by the working group.

The end of the "Feedback" process:

The conclusions included in the working group are directed to the executors as appropriate.

Regarding the evaluation of the effectiveness of the existing criteria, the part of making changes to the criteria, the part of making changes to the regulatory legal documents, the part of making changes to the regulatory legal documents, the department of "risk analysis and segmentation of taxpayers" for the development of relevant algorithms to the "Taxation Methodology" Department, and the "Internal Audit" Department to study the work performed by the auditor, the part that there is no error in the criterion.

In the tax system of Uzbekistan, one of the processes that need to be paid attention to and improved in the management of tax risk is due diligence of taxpayers when choosing counterparties, and as a result, within the framework of the taxpayer (in the first) is a question (problem) of assessing the occurrence of tax risk. For this, in our opinion, in order to additionally provide taxpayers with information available in tax authorities for counterparties, e-invoicing

(EHF) it is necessary to set the coefficient of tax breaks from 0.00 to 1.00 and place information about it under the details of the supplier and buyer. According to our proposal, the coefficients are: "green" when they are between 0.00 and 0.20; From 0.21 to 0.40 it is "orange"; From 0.41 to 0.60, a "light red" reflection is desirable, and from 0.61 to 1.0, a "dark red" reflection.

The analysis shows that cases of operations with counterparties who did not pay VAT to the state budget or did not reflect their mutual operations in Ehf or did not submit tax reports to tax authorities serve to increase the tax risk. One of the ways to reduce or eliminate this problem, in our opinion, is to develop criteria based on algorithms to automate this process. This is done automatically without the intervention of the human factor, based on the indicators presented in the tax reports of taxpayers and the information available in the State Tax Committee, including electronic

invoices, export-import operations, online cash register checks and checks. requires the improvement of the criteria of use in the "Avtokameral" software product, which allows to carry out previous analysis.

In our opinion, among these criteria, it is very important to develop an algorithm of tax risk determination criteria for VAT and profit tax.

These proposed criteria for value added tax increase the possibility of determining the tax risk through the "Avtokameral" software product, ensure the correct implementation of the tax analysis, make the criteria of the program transparent, and in this respect, this methodology is highly scientific. is important.

Conclusions and suggestions.

This proposal defines the intention to analyze the practice of tax risk assessment in monitoring the activities of taxpayers. The analysis provides valuable insights into the strengths and weaknesses of the current system and improves it.

Promotion of tax legislation is important for correct assessment of taxes and reduction of tax evasion. By focusing on high-risk areas and implementing targeted enforcement measures, tax authorities can prevent violations and create a level playing field for all taxpayers.

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