

E-Invoicing Vs. The Expected Changes in Entrepreneur Accounting Services*

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Abstract

The study aims to determine the expected changes in accounting services for entrepreneurs relying on the services of third-party accounting firms, in connection with the introduction of mandatory electronic invoicing. The literature lacks studies on the changes expected by entrepreneurs in the services of accounting offices, relative to the introduction of mandatory e-invoicing. The conducted study has allowed a preliminary identification of the entrepreneurs' expectations towards accounting offices, in connection with the introduction of e-invoicing, and thus indication of further research directions aimed at prepping businesses and accounting offices for the implementation of mandatory e-invoicing. Entrepreneurs expect e-invoicing to eliminate the need to deliver paper invoices to accounting and reduce the frequency of accounting office visits. Accounting offices are instead to be given access to XML files in their clients' e-invoicing systems, from where the transaction data can be downloaded automatically into the financial and accounting systems. The research entails a qualitative descriptive study incorporating the case study method as the research approach and is preliminary in nature (a pilot study). However, the study requires a supplementary quantitative study conducted on a much larger, randomly selected sample, as well as a separate study conducted among accounting offices.

Keywords: e-invoicing, e-accounting, KSeF, VAT gap

Introduction

Public as well as private sector electronic invoicing (Haag et al., 2013, p. 286) is one of the European Commission's priorities, given the fact that invoices constitute critical documents in the business process chain. The swiftness of access to information on transactions made also enables refinement of the tools and techniques designed to increase the efficiency in identifying fraud and VAT settlement irregularities. It is assumed that (Hoza, Żabka, 2021, p.163; Szewczyk, 2021, p. 664) electronic invoicing will contribute to combating tax fraud and sealing the VAT gap, thereby increase budgets revenues of individual EU member states as well as enhance business security. While in the first stage it was businesses which were the main drivers of e-invoicing development, currently (Koch, 2019, p. 6) „*the VAT gap is increasingly becoming the main accelerator for the digitization of business, fiscal, reporting, inventory, trade and logistical documents*”.

The first step towards electronic invoicing in business entailed the introduction, in EU member states, of mandatory e-invoicing for public sector transactions. Under the provisions of the EU Directive (Directive 2014/55/EU) governing electronic invoicing in public procurement, public entities are required to accept e-invoices issued by procurement contractors.

The COVID-19 pandemic - due to the restrictions imposed by medical services on mobility and in-person contact, as well as the spread of remote working - has motivated entrepreneurs (Koch, 2022, p.3) to undertake efforts to

electronify their business, which includes electronic invoicing. Entrepreneurs have recognized a number of benefits of e-invoicing, one of the most important of which entails the ability to automatize the accounting processes involved in the transaction data entry into financial and accounting systems. The automation of accounting processes (Sandberg et al., 2009, p. 289) should result in the economization of the time spent on data entry and the elimination of the errors occurring when data is entered manually into financial and accounting systems. Since most small entrepreneurs in Poland do not employ accountants but rather rely on the services of accounting firms providing services for multiple entities, a question arises of how electronic invoicing will affect entrepreneurs' cooperation with the accounting firms handling their bookkeeping.

The purpose of this paper is to present the results of a pilot study aimed at determining what accounting service changes, particularly in the existing rules of invoice submission to accounting offices, entrepreneurs expect in connection with the introduction of mandatory electronic invoicing, and what their concerns are in regard to the upcoming change in the form of invoicing.

In the first part of the study (Section 2), drawing on the literature analysis and analysis of relevant legal regulations, the idea of electronic invoicing is presented, along with a description of the legal basis, benefits, risks and obligations arising for entrepreneurs as a result of the implementation of e-invoicing. The second part of the study (Section 3) describes the assumptions adopted in the conducted empirical study of the entrepreneurs' expectations with regard to the change in the form of invoicing. Section 4 presents a discussion of the research findings. The last part (Section 5) lays out the study conclusions, outlining its limitations and indicating the directions for future research.

The following research methods were used in the study:

- 1) literature review,
- 2) analysis of national and EU legislation,
- 3) the case study method,
- 4) at the stage of final conclusion formulation, the methods of deduction and synthesis were used.

Legislative and literature overview

In running a business (Kotyla, 2020a, p. 110), the printing and sending of invoices to contractors in the traditional manner is cumbersome, time-consuming and costly, especially for companies working with a large number of contractors. Structured e-invoices in XML format, transferred directly between business partners' computers via the Internet, have become the solution to this problem. Entrepreneurs have noted a number of benefits of e-invoicing, which primarily include (Lumiaho, Ramanen, 2011; UD468, p.4):

- more rapid pace of data exchange between counterparties - issued invoices are available to counterparties in real time practically, which translates into shorter payment waiting time;
- increased buyer confidence in the fact that a given invoice has been issued by an entity authorized to do so;
- lower costs of e-invoice retention - digital data archivization is much cheaper than paper document filling and storing;
- no possibility of losing an invoice;
- reduction in the number of tax administration inspections;
- speedier VAT refunds, which exerts positive impact on liquidity, especially for small and medium-sized taxpayers;
- simplification of entrepreneurs' tax obligations - transaction data for tax settlement purposes can be downloaded by tax authorities directly from databases containing information on issued e-invoices, as opposed to being reported manually, as it is done currently, and
- automation of accounting processes - the xml structure of e-invoice allows for automatic entry of e-invoice data into financial and accounting systems, which reduces the accountants' work time and limits the number of manual data entry mistakes.

In addition to the typical business benefits for entrepreneurs, e-invoicing has become an effective tool in the tax authorities' fight against tax fraud, particularly in the fight against the so-called VAT gap, which reached 137.5 billion euros in 2017 across the European Union, as illustrated in distribution by selected member countries in Table 1.

Table 1. VAT gap 2017

Member country	VAT gap value [billion EUR]	VAT revenues lost
Belgium	4.0	12%
Denmark	2.2	9-10%
Estonia	0.122	6%

Finland	1.6	7%
France	12	6%
Netherlands	25	10%
Lithuania	33.6	24%
Luxembourg	0.385	15%
Latvia	1.1	25%
Germany	0.023	0,7%
Sweden	2.7	5%
United Kingdom (before Brexit)	0.654	1%
Italy	19.4	11%

Source: (UG, 2017, p. 3)

While seeking a solution to tax fraud problems, it has been noted that electronic invoicing enables tax authorities to access databases containing e-invoices, which allows for prompt verification of contractors, and thus timely identification of possible irregularities.

What, then, is an e-invoice? In EU regulations (Directive 2014/55/EU, Article 2), an electronic invoice is defined as an invoice issued, sent and received in a structured electronic format enabling its automatic and electronic processing. It is an equivalent of a paper invoice, containing exactly the same data, but the medium is a digital file, rather than paper, as is the case with traditional invoices. In EU member states, the rules of electronic invoice issuance and retention have been established through the Directive on the common VAT system (Directive 2006/112/EC, Chapter 3 – Invoicing). The adoption of common rules by EU member states translates into adoption of a uniform e-invoice template, thereby facilitates popularization of e-invoicing and helps convince entrepreneurs to utilize it.

In the first stage, EU legislation, followed by member state legislation, targeted the introduction of e-invoicing in B2G transactions. To date, all the EU countries indicated in Table 1 have already introduced mandatory acceptance of e-invoices by public administration bodies. This obligation has also been introduced in Poland (Act, 2019), nevertheless, the circulation of e-invoices in public institutions in Poland is still at a very low level, as indicated by the results of existing studies (Dobrzeniecka, 2018; Kotyla 2020b). One of the more prominent reasons behind this state of affairs pertains to (Kotyla, 2020b, p. 157), which particularly applies to the local government bodies in Poland, is the lack of implemented IT systems of EDMS (Electronic Documents Management Systems) type allowing for the processing of electronic documents.

The entry into force, on July 1, 2016, of the eIDAS regulation was a milestone towards the digitization of documents and electronic delivery thereof (Kotyla, 2020b, p. 149). Its main objective was to provide "*a common foundation for secure electronic interaction between citizens, businesses and public authorities, thereby increasing the effectiveness of public and private online services, electronic business and electronic commerce in the Union*" (eIDAS, preamble to point 1). From an e-invoicing perspective, eIDAS supports (MacGregor Pelikanova et al., 2019, p. 1553) „*the trustworthiness of electronic communications and transactions in the EU*” through development of a legal framework for converting:

- paper documents into electronic documents, in this case paper invoices into e-invoices;
- handwritten signatures and traditional seals into electronic signatures and electronic seals;
- traditional delivery (by mail or courier) to electronic delivery,

which has enabled unambiguous identification of e-invoice issuers and recipients as well as electronic delivery of such sales documents, including electronic confirmation of document transfer and receipt.

Presently, EU member states are at various stages of introducing B2B transaction electronic invoicing. Italy was the first EU member state to implement a state-run system for e-invoicing (*Sistema di interscambio – SdI*) and mandated e-invoicing via SdI, starting January 1, 2019, as the only legally permissible manner of invoice issuance. According to the Italian Revenue Agency (*Agenzia delle Entrate*), more than 2 billion e-invoices had been issued in Italy between January 1 and April 2020, of which more than 50% were invoices documenting B2B transactions (UG, 2017, p. 9). The next two member states which have already launched state-run e-invoicing systems are Spain, which relies on the FACe (*Punto General de Entrada de Facturas Electronicas*) platform, and Portugal, which uses the SAF-T (Standard Audit File for Taxes Purposes). A large percentage of e-invoices circulate in the Scandinavian countries and Estonia, where businesses have recognized the benefits of electronic invoicing and are using commercial solutions, as no e-invoicing state platforms exist there as yet.

Other countries implementing central e-invoicing systems are France and Poland. In France, as of June 1, 2024, e-invoice issuance and transfer will become mandatory for companies with more than 5000 employees. Subsequently, the obligation is expected to extend to smaller companies (250 - 5000 employees). Ultimately, all companies will be obliged to issue e-invoices, starting January 1, 2026.

In Poland, according to the latest data from the Ministry of Finance, the universal e-invoicing obligation will be introduced on July 1, 2024. Originally, it was scheduled for April 1, 2023. At the request of the Polish government, however, the Council of the EU issued an executive decision (Decision 2022/1003) allowing a derogation from Articles 218 and 232 of Directive 2006/112/EC on the common system of value added tax, and thus the originally envisaged date for the introduction of mandatory e-invoicing in Poland has been postponed until 2024. On the technical side, a free platform called the National e-Invoicing System (*Krajowy System e-Faktur*, hereinafter KSeF), developed by the Polish Ministry of Finance, is to be used to drawing up, receive and retain structured invoices. The KSeF platform has been launched and made available to taxpayers as early as of January 1, 2022, to enable taxpayers to issue and receive e-invoices on a facultative basis, and thus test KSeF. According to the assumptions of the Ministry of Finance, the facultative stage is intended (UD468, p.1) to "*contribute to the gaining of experience by taxpayers and the tax administration, as well as prepare them for the introduction of a universal e-invoice system.*" [translated from the original in Polish by CK] These assumptions, however, have regrettably turned out to be ill-conceived, as (*ibidem*) it was initially estimated that about 10% of entities might express interest in e-invoicing via KSeF, whereas by the end of December 2022, only about 90 (!) entities in group of potential users shown in Table 2 were using KSeF cyclically, as per the Polish Ministry of Finance.

Table 2. Potential KSeF users

Group	Size
Goods and services taxpayers	Approximately 1.9 million (as of Q3 2022)
Tax administration units	- tax administration chambers – 16 - tax offices – 400 - customs and tax offices including branches - 204

Source: (UD468, p. 4)

The subsequent part of the paper describes the assumptions of the study conducted, including the conclusions drawn, i.e., the entrepreneurs' main concerns as well as expectations towards accounting offices, relevant to the implementation of mandatory e-invoicing.

Methodology

A multiple case study was chosen as the research method. A proper design of a case study (Yin, 2009) must include the following elements:

- research questions;
- unit of analysis and selection of cases;
- data collection methods, and
- data analysis process and criteria for interpreting the findings;

which are described in the below sections.

The research conducted is the first in this field, and therefore a pilot case, which, as described by Dube and Pare (2003, p.620) in their recommendations, based on a review of published case study reports, "*must be used more widely because they may reveal inadequacies in the initial design and hence, they may help refine the design and the data collection plans.*".

Research questions

This study aims to answer the following research questions:

RQ1: What changes do entrepreneurs expect on the part of the accounting offices, following the implementation of KSeF?

RQ2: What are the entrepreneurs' main concerns regarding the KSeF invoicing obligation?

Unit of analysis and case selection

The unit of analysis was the current model of cooperation between entrepreneurs and the accounting offices to which they have outsourced full business accounting services for their businesses. The time scope of the analysis carried out covers the years 2021-2022, i.e., the period before to the introduction of mandatory issuance and receipt of electronic invoices by businesses.

Based on the principle of linear replication logic (Yin, 2009, p. 54), two cases were selected for the study. In the process of the case selection, the following theoretical assumption was made - entrepreneurs are open to all kinds of digitization-related changes aimed at optimizing the conduct of business and reduction of the associated costs.

Data Collection Methods

As Dube and Pare note (2003, p.615) “*finding and conclusion in a case study is likely to be much more convincing and accurate if it is based on several different sources of information*”. In order to comply with the principle of data source triangulation when collecting the case study data (Yin, 2009, pp.114-118), three data collection methods were used in this study:

- documentation analysis,
- informal conversation, and
- direct interview.

In the first stage of the data collection, draft cooperation agreements were analyzed, as well as press clippings and electronic media articles concerning the model of cooperation and invoice transfer between entrepreneurs and their respective accounting offices. As Yin (2009, pp. 101-103) argues, this type of documentation constitutes a valuable, and accessible owing to the Internet, source of information, although it should be approached with caution and reserve, as it is not always an accurate and unbiased source, which was taken into careful consideration during the study conducted. In order to practically verify the data collected via the document analysis, an informal question and answer session was held with the auditor in charge of the accounting office.

In the next step, interviews were conducted with the surveyed entrepreneurs. The main focus of the interviews entailed direct answers to the research questions posed and the issues related to the development of electronic invoicing in business, with particular emphasis on the KSeF implementation planned by January 1, 2024.

Data analysis process and findings interpretation criteria

The study carried out involved an analysis of the documents relating to the model of cooperation between an entrepreneur and an accounting firm, including the data collected during the direct interviews with entrepreneurs. The following criteria were used to assess the material collected:

- data obtained during the document analysis stage formed the basis for the assessment of the current model of accounting office and entrepreneur cooperation, including the manner of traditional (paper) invoice transfer to the accounting office, and identification of the main difficulties in the current model, with respect to the invoices issued and transferred;
- the data obtained during the direct interviews, particularly the elements indicated equally by both surveyed entities, provided a criterion for assessing entrepreneurs’ expectations towards accounting offices after the implementation of KSeF.

Research findings and discussion

The two entrepreneurs surveyed operate as limited liability companies subject to corporate income tax and VAT, whose books of accounts and tax settlements are maintained by an external accounting firm.

Entrepreneur No. 1 has been operating in the RES industry for approximately two years and is engaged in the installation of air conditioning, heat pumps, ventilation, recuperation, etc. The company has no employees and relies on its own labor as well as on subcontractors who are commissioned for larger works.

Entrepreneur No. 2 has been operating for more than 30 years in the IT industry, where it has achieved great commercial success by creating the first electronic legal information system in Poland. The company is currently working on an e-delivery system for lawyers. Technologically, it is a system similar to KSeF, the foundation of which lies in the legal framework of the EU eIDAS regulation concerning website authentication, electronic identification, electronic signature, electronic time stamps, electronic seals, etc.

Based on the analysis of the two entrepreneurs’ accounting office cooperation agreements and the documentation available on the Internet (Gofin, 2023; Infor, 2021; Poradnik, 2022), it has been determined that the current model of cooperation and invoice transfer involves monthly submission of all invoices to the accounting office by the entrepreneur in ‘paper’ form. The provisions of the contracts analyzed oblige the entrepreneurs to perform, among other things, two types of invoice-related activities:

- the entrepreneur is required to properly document, in formal and legal terms, the business operations subject to entry in the accounting books; and

- the entrepreneur is obliged to provide the accounting office with originals of all the invoices, approved in terms of form and substance, constituting the basis for entries in the accounting books.

The documentation review and the direct interviews with the entrepreneurs allowed identification of three most common issues in the current model of cooperation regarding invoice issuance and transfer thereof to the accounting office:

1. Lack of substantive support in invoicing, i.e., substantive and formal errors can be found in the invoices issued and submitted to contractors, which are only noticed - if at all - after such an invoice has been submitted. Current invoicing IT systems do not offer any sophisticated tools for verification of issued invoice correctness, and only a few formal invoice elements are verified, such as: compatibility of the dates on the invoice, taxpayer identification number format, mathematical correctness of the VAT amount and rate calculation, etc. In effect, customers may condition payment for such invoices on the receipt of revised and correct invoices, which often is no longer possible.
2. Lack of control over the invoices submitted to the accounting office, i.e., over which invoices have and which have not yet been transferred, which applies to both the purchase invoices received from suppliers as well as the sales invoices issued to customers. In consequence, some documents may have not been transferred to the accounting office, and thus are not included in the tax settlement for a given month. This, in turn, results in the need to correct the accounts already settled by the accounting office, causing the entrepreneur to incur additional costs and pay higher taxes and tax penalty interest for late payment of taxes.
3. Lack of access to archive invoices, i.e., to invoices already submitted to the accounting office, or the need to scan all invoices, before submitting to the accounting office, and keep a company archive of the scans (e.g., in many cases, original purchase invoices, which have been submitted to the accounting office, constitute the basis for claim filing, in which case the need to visit the accounting office and spend time to find the invoice needed for filing a claim for the goods or services purchased emerges).

Turning to the answers provided to the research questions posed during the direct interviews with the entrepreneurs, their responses were as follows respectively:

RQ1: What changes do entrepreneurs expect on the part of the accounting offices, following the implementation of KSeF?

1. Both entrepreneurs intend to share their KSeF accounts and expect the accounting office to independently import all invoices for a given month from KSeF into its financial and accounting system, which will:
 - reduce the necessary visits to the accounting office to submit 'paper' invoices, and
 - eliminate the risk of not submitting all the invoices for a given month to the accounting office.
2. Both entrepreneurs are counting on the fact that invoice assignment, i.e., the substantive description of purchase invoices aimed at, for instance, determining the purpose of incurring a given expense or the planned period of the acquired fixed asset's economic usefulness, which allows correct calculation of its depreciation rate, etc., will be carried out via the KSeF system, and not on 'paper', as at present. This, in turn, will reduce the amount of entrepreneurs' time spent on handling accounting matters related to the settlement of a given month.

RQ2: What are the entrepreneurs' main concerns regarding the KSeF invoicing obligation?

1. Entrepreneur No. 1 holds no concerns with regard to the KSeF invoicing obligation, and remarks only on the sheer benefits, in the context of both running a business and bookkeeping.
2. Entrepreneur No. 2 holds several concerns and doubts, the most important of which pertain to the following:
 - there is no possibility of making minor corrections on the invoices issued via KSeF – at present, quite often, certain minor adjustments (accepted by both sides of the transaction, naturally) are needed after issuing an invoice and submitting it to the recipient, which can involve, for instance, the need to make minor changes to the invoice content, e.g., the selling price, etc. The Polish VAT law is very strict on the possibility of correcting issued invoices, and only allows correction by issuing another document, i.e., a correcting invoice or a correcting note, the issuance rules and templates of which are specified in the VAT law. In the case of minor adjustments, agreed on by both parties, this tends to be a hassle and generates additional, unnecessary accounting documents;
 - there is no possibility of issuing an invoice with a date of the month that has ended – presently, quite often, buyers ask for invoices with a date for the month that has ended, instead of the month in which they are actually issued, e.g., in the first days of February they ask for an invoice with a January date. This is, in some cases, advantageous to the taxpayer, from the perspective of tax settlements, since, in the case of high revenues, it can slightly increase the costs in a given month, provided that it is done before the tax settlement for such a month has been made. KSeF is likely to prevent this and invoices will be dated in accordance with the actual issuance thereof;

- the manner of settling the VAT due for an invoice already submitted via KSeF but not yet accepted by the buyer – in accordance with the VAT regulations, an invoice issuer is obliged to pay the VAT payable under the VAT invoice issued, regardless of whether the buyer has accepted it or not. Presently, if an invoice issued is not accepted by the buyer, it is discarded by the issuer, who then is not obliged to pay the VAT due. When such an invoice is entered in KSeF, it will become undeletable, while rectification of such a situation is quite complicated, since a correction invoice alone, in such a case, is not enough under Polish VAT regulations;
- the usability of the KSeF system's interface, which is being developed with the intention to ensure most KSeF system implementation benefits for the National Tax Administration, not the taxpayer – as such, there are concerns that entrepreneurs will have to pay extra for commercial applications compatible with KSeF, as the system will not carry all the functions a business needs.

The study allows a conclusion that the entrepreneurs surveyed present a rather optimistic approach towards the change in the form of invoicing. Despite some concerns, primarily regarding:

- the no possibility to make minor adjustments to invoices already issued, and the
- the possible costs associated with the change in the form of invoice issuance,

they do see more good than bad in the planned introduction of mandatory electronic invoicing. Their main hopes with regard to e-invoicing lie in the streamlining of the service provided by the accounting office, which will ultimately reduce the number of their visits to the accounting office and minimize the time currently spent on invoice printing, collating and assigning. One positive aspect of the e-invoicing introduction, emphasized by both entrepreneurs, is the elimination of the risk of not submitting all the 'paper' invoices for the month being settled. The accounting office's access to the entrepreneurs' KSeF invoices will ensure completeness in the transfer of invoices for bookkeeping and tax settlement.

Conclusions

The mandatory digitization of invoices represents a watershed moment for entrepreneurs, accounting services and tax authorities in the EU member states. In Poland, the introduction of mandatory electronic invoicing is planned for the second half of 2024. This process will pose a major challenge for smaller entrepreneurs as well as the accounting firms providing bookkeeping services for small entities which do not employ own accountants but rather commission their bookkeeping to accounting offices.

From an accountant's perspective, the replacement of a paper invoice with an electronic invoice can be compared to the revolution that took place in accounting at the end of the 20th century, when paper ledgers were replaced by electronic ledgers, i.e., ledgers maintained on a computer using financial and accounting information systems. Despite some concerns, the process of replacing paper invoices with e-invoices is an irreversible step. The relegation of the paper invoice is only a matter of time and individual governments' determination.

The survey showed that the introduction of mandatory e-invoicing will require certain changes both in the rules of entrepreneur and accounting office cooperation, as well as in the software presently used by entrepreneurs and by accounting offices. From the entrepreneurs' perspective, the switch from the current invoicing system to KSeF should be neither burdensome nor costly, as KSeF is provided free of charge by the Polish Ministry of Finance. Larger and more costly changes will have to be made by accounting offices providing services to entrepreneurs. Invoicing via KSeF will fundamentally remodel the form of invoices and thus the manner in which they are submitted to accounting offices. This will force a change in the way data is entered into financial and accounting systems (automation in place of the current manual entry), which in turn implies the need to adapt the financial and accounting systems to the new conditions.

The research carried out has limitations arising from the study approach adopted, namely:

- the study was limited in nature, as only two entrepreneurs were selected for the survey;
- accounting offices were not surveyed to determine their concerns and expectations regarding the change in the form of invoicing;
- the study is qualitative in nature, which prevents generalization of the results.

Despite these limitations, the study represents a step towards assessing the necessary changes in entrepreneur accounting services, following the introduction of electronic invoicing. Further directions for future research should involve expansion of the entrepreneur group surveyed and inclusion of accounting offices, as the main burden associated with the change in the manner of electronic invoice data entry will fall on those entities.

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