

May 12, 2026, HBR Alert!



2026 State Health Plan ACA 1094/1095 Reporting Program

Please note this message is for non-FIORI groups that are part of the State Health Plan. Best Shared Services handles this reporting requirement for all FIORI agencies.

The State Health Plan (Plan) offers Affordable Care Act (ACA) reporting options, described below, to assist with your obligation to the Internal Revenue Service (IRS). The IRS requires yearly ACA reporting for all groups. Groups are **not** required to use one of the Plan paid options to satisfy their reporting obligation.

Groups not participating in the Plan paid program should still sign up for the “Data Download Only” option to provide an ACA contact to receive COBRA files. These COBRA data files are for previous employees and dependents who elected COBRA coverage. The Plan sends COBRA files in December to all groups with reportable data, regardless of whether they signed up for the Plan paid program.

IRS ACA Reporting Requirements

The ACA created the requirements for yearly 1094/1095 reporting to the IRS. As a self-insured employer, your group is required to file either forms 1094-B/1095-B or 1094-C/1095-C with the IRS each year. The forms must be delivered to the IRS and your employees as evidence of ACA compliance. Electronic filing is required for employers with 10 or more forms.

All employers participating in the State Health Plan are self-insured employers and required to comply with these requirements.

IRS requirements differ somewhat for small and large self-insured employers. The IRS requires employers with *less than 50 Full-Time Equivalent (FTE) employees* to file 1094-B and 1095-B forms. The number of FTEs is determined by the average FTE count during the prior year (2025). These employers submit summary group information on the 1094-B form and must report all coverage provided for employees and their dependents on the 1095-B forms.

Employers averaging *50 or more FTEs* during the prior year (2025) must file 1094-C and 1095-C forms. These employers submit summary group information on the 1094-C form. A 1095-C form is filed for each full-time employee, indicating all offers of coverage and coverage provided for the employee and any dependents.

State Health Plan ACA Reporting Program

The Plan has partnered with our vendors to offer ACA reporting options for groups that do not have their own solution. We also have an option for those groups that manage their own filing and only need a data download from our Eligibility and Enrollment vendor (Benefitfocus) system.

State Health Plan ACA Program Options for 2026

The Plan offers the four options below. Your choice depends on your group size and need. Descriptions of each option follow.

- Fully Managed Small Group: for Groups with under 50 FTEs
- Fully Managed Large Group: for Groups with 50+ FTEs. Higher cost but most work is done for you.
- Group Managed Large Group: for Groups with 50+ FTEs. Lower cost but you make your own 1095-C data updates.
- Data download only: Provide Group ACA contact to receive COBRA files and obtain free access to your Benefitfocus ACA data.

To view a comparison of these offerings, click the link below:

[ACA Offerings Comparison and Responsibilities Matrix · SHP Portal](#)

Fully Managed Small Group Option - for Employers with Less than 50 FTE

The Plan's TPA, Aetna, is the 1094-B/1095-B reporting vendor. The Plan and Aetna will provide the following:

- A fully comprehensive reporting solution, including data updates, form generation and distribution, and IRS filing
- Minimal responsibility for the Group

The Group will be responsible for the following:

- Providing ACA contacts
- Providing 1094-B group information (EIN, address, etc.)
- Correcting member data for those returned on IRS error reports after filing

Cost is \$625.

- Only available for those groups with less than 50 FTE on average in 2025

Fully Managed Large Group Option - for Employers with 50 or More FTE

The Plan's EES vendor, Benefitfocus, is the 1094-C/1095-C reporting vendor. The Plan and Benefitfocus will provide the following:

- A fully comprehensive reporting solution, including data updates, form generation and distribution, and IRS filing
- Minimal responsibility for the Group

The Group will be responsible for the following:

- Providing ACA contacts
- Completing the 1094-C form on the Benefitfocus platform
- Making corrections to member data returned on IRS error reports after filing

Cost is \$7.50 per form plus postage and a flat fee of:

- \$4,500 for less than 1,000 forms
- \$7,500 for 1,000 or more forms

Group Managed Large Group Option - for Employers with 50 or More FTE

This option is cheaper than the Fully Managed option but requires a high level of work and ongoing participation from the Group.

The Group must be fully engaged to meet deadlines and is responsible for the following:

- Providing ACA contacts
- Completing the 1094-C form on the Benefitfocus platform
- Downloading 1095-C base ACA data from the Benefitfocus platform
- Updating the downloaded 1095-C data using documented guidelines
- Incorporating 1095-C carryover data from the Benefitfocus platform
- Incorporating 1095-C COBRA data provided by the Plan
- Uploading the updated 1095-C data to the Benefitfocus platform
- Making quality check corrections to data
- Working to make corrections to members who are returned on IRS error reports after filing

The Plan and its Large Group ACA vendor, Benefitfocus, will provide the following:

- Training, including live webinars, videos, and documentation
- Subject matter expertise to answer questions
- Program management and status reporting
- Data quality check(s) and feedback of submitted 1095-C ACA data
- 1095-C form distribution to recipients
- Electronic IRS filing
- Formatted IRS error reports available to the Group for corrections
- Electronic IRS filing resubmissions after corrections

Cost is \$7.50 per form plus postage.

Data Download Only

- The Group has the most responsibility with this option.
- The Group must have its own ACA reporting vendor and/or software that meets IRS requirements.
- No cost

The Group must do the following:

- Complete the online signup form and choose the Data Download Only option.
- Provide ACA contacts to ensure COBRA data file delivery.

The Plan and Benefitfocus will provide the following:

- Access to download ACA data from the Benefitfocus platform.
- COBRA files emailed in December to the Group's ACA contacts. Data will be in Benefitfocus format for any previous employees and/or dependents who elected COBRA coverage.

How to Sign Up for the ACA Program

The ACA signup form is located here:

<https://shpapplicationportal.shpnc.org/SHP-ACASignup/>

The signup deadline for Program paid options is June 30, 2026.

Please ensure you are signing up for the correct Program option:

- Fully Managed Small Group – less than 50 FTEs
- Fully Managed Large Group – 50+ FTEs. Most of the work is done for you but costs more.
- Group Managed Large Group – 50+ FTEs. You update your own 1095-C employee data but pay less.
- Data Download Only: Provide COBRA file contacts and obtain free access to your group's Benefitfocus ACA data.

Review this option comparison: [ACA Offerings Comparison and Responsibilities Matrix](#)

If you have questions, please email ACA@nctreasurer.com.

