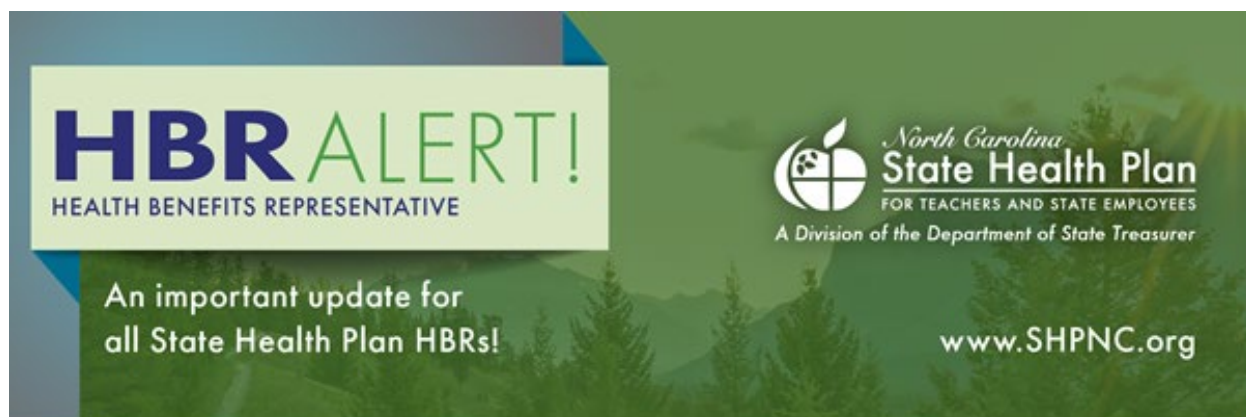# May 16, 2025, HBR Alert!

2025 State Health Plan 1094/1095 Reporting Solutions

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

All other groups: Please read this entire message, as there have been changes to the 2025 Affordable Care Act Reporting Program offerings.

Signup deadline for 2025 offerings is June 30, 2025.

The State Health Plan (Plan) offers the Affordable Care Act (ACA) Reporting Program options 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.

For those groups that do not use one of the Plan paid options, we do ask that you sign up for the "Data Download Only" option to provide the Plan with an ACA contact to receive COBRA data later this year. This COBRA data is for previous employees and dependents who elected COBRA coverage after employment termination. The Plan sends COBRA data in late December to all groups with data to report, regardless of whether they signed up for a Plan paid reporting option.

IRS ACA Reporting Requirements

The ACA created the requirements for yearly 1094 and 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 to your employees as evidence of compliance with the ACA. Starting in 2024, electronic filing is required for employers with 10 or more forms.

All employers utilizing the Plan are self-insured employers and therefore required to comply with these requirements.

The filing of 1094-B and 1095-B forms is required by the IRS for self-insured employers with less than 50 Full-Time Equivalents (FTEs) on average during the prior year (2024). These employers submit information about the group on the 1094-B form and must report all coverage provided for employees and their dependents on the1095-B forms.

The filing of 1094-C and 1095-C forms is required for employers with 50 or more FTEs on average during the prior year (2024). These employers submit summary information about the group on the 1094-C form. A 1095-C form is filed for each full-time employee who worked for the employer during the year, indicating all offers of coverage in Part II of the form. Employers also report all coverage provided for employees and their dependents in Part III of the form.

State Health Plan ACA Reporting Program

The Plan has partnered with our vendors to offer several ACA reporting options for groups who do not have their own tools to meet the IRS requirements. We also have an option for those groups that have their own reporting solution and just need a data download from our Eligibility and Enrollment vendor (Benefitfocus) system.

The Plan made significant changes to the ACA Reporting Program last year, and these changes carry over to this year. The Plan has additional changes to the 1095-B Program this year that interested groups should note.

State Health Plan ACA Program Offerings for 2025

To view a comparison of these offerings, click the link below:
[ACA Offerings Comparison and Responsibilities Matrix · SHP Portal](#)

Fully Managed Offering –
for Employers with Less than 50 FTE on average in 2024
This year the Plan's new TPA, Aetna, will be the new 1094/1095-B reporting vendor. The same comprehensive solution will be provided to Groups. However, the new vendor means a change for how copies of mailed forms will be available:

- After IRS filing is complete, Groups will no longer be sent a file with electronic copies of the forms.
- Group employees may access copies of their own 1095-B forms in the Aetna online member portal.
- Group employees who don't register for the Aetna member portal may request to have copies of their forms mailed or emailed to them.
- Group employees will have their 1095-B forms mailed to them as in prior years.
- The Plan will work with groups on any IRS filing data discrepancies as in prior years.

The Plan and its 1094/1095-B reporting vendor will provide the following:
- A fully comprehensive reporting solution
- Minimal responsibility level for the Group
- Cost is $625
- Only available for those groups with less than 50 FTE on average in 2024

The group will be responsible for the following:
- Project contacts
- Provide 1094-B information
- Work to make corrections to members who are returned on IRS Error Reports after electronic filing

Fully Managed Offering –
for Employers with 50 or More FTE on average in 2024
- A fully comprehensive solution will be provided on behalf of the group by the Plan and its 1094/1095-C reporting vendor.
- Minimal responsibility level for the Group
- 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
- Only available for those groups with 50 or More FTE on average in 2024

The group will be responsible for the following:
- Project contacts
- Complete the 1094-C form on the Benefitfocus platform
- Work to make corrections to member data returned on IRS Error Reports after electronic filing

Group Managed Offering –
for Employers with 50 or More FTE on average in 2024
- High level of responsibility for the Group
- Cost is $7.50 per form plus postage
- Only available for those groups with 50 or More FTE on average in 2024

The group is required to be fully engaged to meet deadlines and is responsible for the following:
- Provide project contacts
- Complete the 1094-C form on the Benefitfocus platform
- Download 1095-C base ACA data from the Benefitfocus platform
- Update the downloaded 1095-C data based upon documented guidelines
- Incorporate 1095-C carryover data from Benefitfocus platform
- Incorporate 1095-C COBRA data provided by the State Health Plan
- Upload the 1095-C data back to the Benefitfocus platform
- Make quality check corrections to data
- Work to make corrections to members who are returned on IRS Error Reports after electronic filing

The Plan and its 1094/1095-C ACA vendor, Benefitfocus, will provide the following:

- Program management and status reporting
- Documentation and training
- Subject matter expertise to answer questions
- 1095-C Data in Benefitfocus format for any previous employees and/or dependents that have elected COBRA coverage after termination of employment from the group
- Data quality check(s) and feedback of submitted 1095-C ACA data
- Form Print and Mailing service
- Electronic IRS filing
- IRS error reports back to the Group for corrections
- Electronic IRS filing resubmissions after corrections

Data Download Only

- This is the highest level of responsibility for the Group
- The group must find their own ACA reporting vendor and/or have their own software that meets current year IRS requirements
- No cost

The group is required to do the following:

- Complete signup online form submission
- Provide ACA contacts to ensure COBRA data delivery

The Plan and its Eligibility and Enrollment vendor, Benefitfocus, will provide the following:

- Provide access to download ACA Data from the Benefitfocus platform
- Provide data in Benefitfocus format for any previous employees and/or dependents that have elected COBRA coverage after termination of employment from the group

The program signup form is located at the following link and must be submitted by the signup deadline of June 30, 2025:
https://shpapplicationportal.shpnc.org/SHP-ACASignup

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