

Office of the State Controller

OFFICIAL MEMORANDUM

To: Chief Financial Officers, NCFS Fiscal Contacts

From: Taylor Brumbeloe - Deputy State Controller Taylor Brumbeloe

North Carolina Financial Systems Division

Date: October 13, 2025

Subject: Annual 1099 Processing – NCFS

Annual 1099 processing in the North Carolina Financial System (NCFS) begins in early December. The deadline for submitting the 2025 1099 electronic file to the IRS is January 31, 2026. The North Carolina Office of the State Controller (OSC) will file the Internal Revenue Service (IRS) 1099 file electronically for all NCFS agencies on Friday, <u>January 30th</u>, 2026. 1099 corrections recorded in NCFS after the original 1099 file submission will be electronically filed <u>March 30th</u>, 2026. After March 30th, 2026, if an agency determines additional corrections are required, the agency will be responsible for providing OSC with a 1099 correction text file for submission to the IRS, prepared in accordance with the specifications outlined in IRS <u>Publication 1220</u>.

Individual state agencies are responsible for filing their own 1099 information to the North Carolina Department of Revenue (NCDOR). For details regarding when to file required 1099s to NCDOR please see the NCDOR website. https://www.ncdor.gov/taxes-forms/withholding-tax

Agencies are responsible for procuring the needed supplies, printing, and mailing the 2025 1099 forms to recipients by **January 31, 2026**. OSC <u>will not</u> supply envelopes for printed 1099s or blank 1099/1096 forms for 1099 changes. The 1099 envelopes will be the same two windowed envelopes that have been used in past years.

Due to the centralization of 1099 reporting, it is critical that your agency review the NCFS **AP-022 1099 Maintenance Report** for accuracy each month to validate and update 1099 information as needed.

Please refer to the memo attachment for 1099 processing procedure details and schedule for tax year 2025. If you have any questions regarding NCFS 1099 activities, please contact OSC Contact Center at (919) 707-0795 or ncfs@ncosc.gov.

Attachment

Memorandum No. NCFS 26-1



1099 Processing Procedures for Calendar Year 2025

Below is the timeline and activities for 2025 1099 processing. All information, including any interest paid on tax exempt bonds, should have been recorded throughout the 2025 calendar year by flagging invoices with the appropriate 1099 codes and reviewing the **AP-022 1099 Maintenance Report**. Additionally, each agency should verify all interfaced data is correct in the North Carolina Financial System (NCFS). The end-of-year tasks should consist primarily of a final review of reports for errors and accuracy of data.

The deadline for coding 1099s in NCFS will be midnight on Thursday, January 29, 2026. On Friday, January 30, 2026, OSC will transmit the electronic file to the IRS for all NCFS agencies.

OSC will transmit one file for the NCFS agencies' 1099 data to the IRS. Each agency will be reported under its own Federal ID number and is responsible for its data but is not responsible for transmitting the original electronic file. There should be no <u>direct reporting</u> of <u>original NCFS 1099 data by the agencies to the IRS</u>. As in the past, any 1099 information that is not maintained within NCFS will be the responsibility of the agency.

As stated in the previous memos, the IRS has reduced the threshold for submitting 1099 changes to the IRS electronically. Agencies will need to record 1099 corrections in NCFS with zero-dollar invoices to update reportable amounts for suppliers beginning **February 2, 2026**. The following timeline has been established to process calendar year **2025** 1099 information:

1099 PROCESSING SCHEDULE FOR CALENDAR YEAR 2025	
January 1 - December 31, 2025	Review 1099 AP-022 1099 Maintenance Report for 1099 flagging or changes.
October 15, 2025	Link for 1099 Contact Form will be sent to agency users to provide a main 1099 contact for each agency and the agency's phone number to print on the 1099 forms. Deadline to complete 1099 contact form is October 31, 2025.
December 31, 2025	2025 calendar year reporting cycle ends.
January 29, 2026	Last day to make changes to 1099 data in NCFS prior to OSC generating the original 1099 electronic IRS file. All changes should be completed by midnight.
January 1 - 31, 2026	2025 1099 forms are available for printing in NCFS. Forms must be postmarked to suppliers by January 31 st . <u>AP-39 Printing 1099 Form</u>
January 30, 2026	OSC will submit the original electronic 1099 file to the IRS.
January 31, 2026	IRS required deadline for issuing printed 1099 forms to recipients and filing the IRS electronic file.
February 2, 2026	Agencies can begin recording 1099 correction invoices in NCFS for CY 2025 1099s using zero-dollar invoices. <u>AP-41 Zero Dollar Invoices</u>



March 29, 2026	Last day to enter 1099 corrections with zero-dollar invoices in NCFS. Zero-dollar invoices must be in paid status and accounted by midnight.
March 30, 2026	2025 1099 correction forms are available for printing in NCFS. OSC will submit the electronic 1099 corrections file to the IRS. AP-42 Printing 1099 Correction Form

Non-resident Aliens (Foreign Nationals) are not eligible to receive IRS Form 1099. These transactions receive a 1042-S form which will be provided by OSC to each reporting agency. Please do not flag foreign vendors for 1099 reporting. The IRS Form 1042-S will be issued out of Sprintax Calculus.

Effective January 1, 2011, Section 6050W of the Internal Revenue Code requires a payment settlement entity to report payments made to merchants for goods and services in settlement of payment card and third-party payment network transactions. To avoid duplicate reporting of these transactions, 1099 eligible payments made with a P-Card should not be recorded in NCFS.

North Carolina Department of Revenue (NCDOR) requires the withholding of income tax from certain payments made to nonresident (of the State of NC) individuals and entities. Additionally, NCDOR requires withholding on payments made to contractors that possess an Individual Taxpayer Identification Number (ITIN). For detailed information on this withholding, please reference the NCDOR website https://www.ncdor.gov. The state withholding amount from NCFS payments will not be reflected on the IRS 1099 forms that are printed from NCFS.

It is the responsibility of the individual state agencies to report the state withholding on appropriate NC-1099 forms and to file any required 1099 information with NCDOR based on NCDOR requirements. For details regarding when to file any required 1099s to NCDOR and directions on reporting state withholding, please see the NCDOR website. https://www.ncdor.gov/taxes-forms/withholding-tax

If there are any additional questions regarding the proper coding within NCFS, please contact the OSC Contact Center at ncfs@ncosc.gov or NCDOR at 1-877-252-3052 for further withholding and reporting directions.