

## Forms 1099-MISC and 1099-NEC State ID Requirements

Prepared by the KPMG Information Reporting & Withholding Services (IRW) practice

**December 20, 2021** | Information return filing deadlines for the 2021 tax year are quickly approaching and state filing requirements are evolving. This notice outlines requirements to include state identification numbers when submitting Forms 1099-MISC and 1099-NEC. Payors often register for, and receive, these numbers when direct reporting, but may misunderstand the requirement when filing through the Combined Federal/State Filing (CF/SF) Program.

When the IRS forwards Forms 1099 to states through the CF/SF Program, state tax authorities often use state identification codes to match the forms to payors registered in the state's system. Publication 1220 (found <u>here</u>) lays out the general e-filing specifications for information returns, noting that taxpayers should include state specific information, such as the state income tax withheld, local income tax withheld, and the combined federal/state code. However, Publication 1220 does not cover a key input which is required for many states, state specific IDs. Looking specifically at the Payee "B" record layout positions for Form 1099-MISC, Publication 1220 includes the following description for Fields 663-722: *This portion of the "B" Record may be used to record information for state or local government reporting or for the filer's own purposes. Issuers should contact the state or local revenue departments for filing requirements. If this field is not used, enter blanks.* 

Based on the above description, it is not entirely clear whether each state requires this field position to be filled out, or what information needs to be included. Looking to state guidance often doesn't make the issue much easier, as states issue a wide range of identification codes that may be required for unrelated filing purposes. For example, a state may issue a business registration number, a tax registration number, and a withholding tax account number, and yet still not require the Form 1099-MISC fields to be filled out. Complicating matters slightly, the corresponding field position for Form 1099-NEC in the current Publication 1220 instructs taxpayers to enter blanks. This appears to be an error; KPMG has contacted the IRS and will monitor for updates.

Many states follow Publication 1220 filing specifications with minor modifications per specific state requirements. For instance, Vermont requires Payee Record "B" to include the Vermont Withholding Account Number in position 663-722. Similarly, Idaho requires filers to enter their 9-digit Idaho Withholding Account Number in the Payee B record position 663-772. In many cases, state issued guidance instructs users which state ID is required and how to obtain it. In some cases, states warn filers that forms missing state IDs may cause filing issues to occur. For example, Maryland warns taxpayers that failure

to include the Central Registration Number (CRN) will either delay the processing time or will be cause for the file to be rejected. Thus, taxpayers should ensure that their filing processes are up to date to avoid potential processing errors, which could lead to state filing penalties.

KPMG has analyzed current state guidance and provided the table below, containing state ID requirements for those states which currently require Forms 1099-MISC and 1099-NEC.\* Note that states are continually issuing new guidance for state updates. KPMG recommends that you reach out to our IRW tax professionals regarding the latest status for state reporting.

\*Form 1099-NEC was recently added to the CF/SF Program. Many states have not yet updated their guidance to note whether the form will be accepted through the CF/SF Program. KPMG will continue to monitor for updates and issue an alert in January.

State	State ID Required	Notes	Registration
Alabama	Alabama Withholding	Only required if	<u>Here</u>
	Tax Account Number	withholding	
Arkansas	Arkansas ID number	Only required if	<u>Here</u>
		withholding	
California	Not required		
Colorado	1099 Withholding	Only required if	<u>Here</u>
	Account	withholding	
Connecticut	Connecticut Tax		<u>Here</u>
	Registration Number		
Delaware	Use federal EIN		
District of	MyTax.DC.gov Login	Direct filing only,	<u>Here</u>
Columbia	Required	requires site login	
Georgia	Georgia Withholding	Only required if	<u>Here</u>
	Number	withholding	
Hawaii	Not required		
Idaho	Idaho Withholding		<u>Here</u>
	Account Number		
lowa	Iowa Withholding	Input 0's if no	<u>Here</u>
	Permit Number	withholding and no	
		permit	
Kansas	Kansas Withholding		<u>Here</u>
	Tax Account Number		
Kentucky	Kentucky Withholding	Only required if	Here
	Tax Account Number	withholding	
Louisiana	LDR Account Number	Only required if	<u>Here</u>
		withholding	

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State	State ID Required	Notes	Registration
Maine	Maine Withholding	Only required if	<u>Here</u>
	Account Number	withholding	
Maryland	Maryland Central		<u>Here</u>
	Registration Number		
	(CRN)		
Massachusetts	MassTaxConnect	Direct reporting is	<u>Here</u>
	registration required	required for Form 1099s	
Michigan	Not required		
Minnesota	Minnesota Tax ID	Only required if	Here
	Number	withholding	
Mississippi	Mississippi Withholding	Only required if	Here
	Tax Account Number	withholding	
Missouri	Not required		
Montana	Not required	Direct reporting is	<u>Here</u>
		required	
Nebraska	Nebraska Number		<u>Here</u>
New Jersey	New Jersey Corporate	Only required if	<u>Here</u>
	Identification Number	withholding	
New Mexico	New Mexico Business	Only required if	<u>Here</u>
	Tax Identification	withholding	
	Number		
North Carolina	NC Withholding ID		<u>Here</u>
	Number		
North Dakota	Use federal EIN	Add -01 to the end of	
		the federal EIN	
Ohio	Not required		
Oklahoma	Oklahoma Withholding		<u>Here</u>
	Account ID		
Oregon	Not required	Direct reporting requires	<u>Here</u>
		registration on iWire	
Pennsylvania	PA Employer Account	Additional information	<u>Here</u>
	ID	required for filers without	
<b></b>		an ID	
Rhode Island	Not required		
South Carolina	SC Withholding File		<u>Here</u>
	Number		
Utah	Utah withholding	Only required if	<u>Here</u>
	account ID	withholding	

State	State ID Required	Notes	Registration
Virginia	Not required	Withholding requires portal registration	<u>Here</u>
West Virginia	Not required	Withholding requires portal registration	<u>Here</u>
Wisconsin	Wisconsin Withholding Tax Number	If not required to withhold and never held	Here
		an ID, enter 036888888888801	

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