



United States Office of Personnel Management  
The Federal Government's Human Resources Agency

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## Benefits Administration Letter

**Number:** 22-101

**Date:** March 15, 2022

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### **Subject: Changes to Acceptable Signature Requirements on Retirement Processing Forms**

The Office of Personnel Management (OPM) previously published guidance through [Benefits Administration Letter \(BAL\) 20-102, Temporary Changes to Retirement Application Processing While Operating Under Coronavirus Disease \(COVID-19\) Telework Policies](#).

The purpose of this BAL is to outline the new changes to the signature requirements for retirement package forms. This BAL supersedes the *temporary signature requirements* outlined on BAL 20-102. In order to support the health and safety of individuals and to give Human Resource and Payroll Offices maximum flexibilities to submit retirement applications in a timely manner, OPM will allow the use of electronic signatures (including those that use digital signatures) on all retirement application forms.

These changes are made in accordance with section 850.106 of [title 5, Code of Federal Regulations](#), which allows electronic signatures on forms related to federal retirement and benefit programs. Agencies and Payroll offices are encouraged to implement the new changes effective on the date of publication of this BAL. Forms submitted in accordance with this BAL will be accepted as valid, and no additional documentation will be required. If the requirements for valid electronic signatures are not met, agencies will be expected to resubmit documentation that meet the new requirements.

## **Permanent Changes to Acceptable Signature Requirements on Retirement Processing Forms**

Under our new policy, OPM will accept electronic signatures on applications, documents, and forms OPM receives to adjudicate retirement and death in service claims. OPM will consider these electronic signatures as effective for purposes of processing, as long as the electronic signatures meet the requirements listed below.

Going forward OPM will accept electronic signatures (including use of digital signatures) for the retirement forms listed in *Appendix A*. This includes signatures by applicants, Human Resources personnel, Payroll offices, witnesses, or other third parties (as applicable), along with any other required supporting documentation when the retirement forms require signatures of these parties.

This list of forms is not intended to be all-inclusive; other post-retirement forms and documents may also be electronically signed and submitted as required by OPM's retirement services.

### **Types of Acceptable Electronic Signatures**

OPM will now accept a wide range of electronic signatures (including use of digital signatures) on retirement forms. Acceptable electronic signature methods include the following:

1. Electronic signed in accordance with [15 U.S.C. §§ 7001, 7021, and 7031](#) (please see the requirements listed below) submitted by agencies. Agencies must keep the associated record that reflects the process by which the signatures were created;
2. Personal Identity Verification (PIV) or Common Access Cards (CAC) or other verifiable certificate authenticated signatures (ex. PDF documents signed using a digital certificate);
3. Signatures created through a third-party software, such as DocuSign, HelloSign, Adobe Sign, or other agency approved third-party software. The digital signatures created must be verifiable certificate

authenticated signature and comply with 15 U.S.C. §§ 7001, 7021, and 7031. Agencies must keep the associated record that reflects the process by which the signatures were created;

*Appendix B* provides examples of electronic and digital signatures that will be accepted. We will continue to assess the risk of fraud, error, or misuse of the various types of acceptable electronic signatures and will make future updates to these acceptable methods as necessary.

## **Requirements for Valid Electronic Signatures**

In accordance with 15 U.S.C. §§ 7001, 7021, and 7031 on facilitating the use of electronic records and signatures, OPM will consider an electronic signature valid if it meets the following requirements:

1. **Intent to sign** – Electronic signatures, like traditional wet ink signatures, are valid only if each party intended to sign the document.
2. **Consent to do business electronically** – All parties signing the document agree to conduct the transaction using electronic means. This consent may be express or implied in that all parties agree that the electronic signatures appearing on the document are the same as “wet” signatures for the purposes of validity, enforceability, and admissibility.
3. **Association of signature with the record** –To qualify as an electronic signature under 15 U.S.C. §§ 7001, 7021, and 7031, the system used to capture the electronic signature must keep an associated record that reflects the process by which the signature was created, or generate a textual or graphic statement (which is added to the signed record) proving that it was executed with an electronic signature. This is done when the electronic signature is time stamped on the electronic document at the time it is signed and is saved as part of a PDF document.
4. **Record retention** – The law also requires that electronic signature records be capable of retention and accurate reproduction for

reference by all parties or persons entitled to keep the record. OPM recommends that agency Chief Human Capital Officers (CHCO) review their records retention schedules for retirement application forms in accordance with the National Archives and Records Administration guidelines and the standards of [OPM's Guide to Personnel Recordkeeping](#). OPM's Retirement Services maintains any federal employee record that could be used for retirement for 115 years.

To ensure documents with electronic signatures are created in a valid and secure manner, an agency should:

- Create and maintain documentation of the systems used to create the records that contain electronic signatures.
- Ensure the records that include electronic signatures are created and kept in a secure environment that protects the records from unauthorized modification or destruction.
- Implement standard operating procedures for the creation, use, and management of records that contain electronic signatures, and keep adequate written documentation of those procedures.
- Create and keep records according to these documented standard operating procedures.
- Outline steps to [validate](#) an electronic signature in the standard operating procedures.
- Train agency personnel in the established standard operating procedures.

Agencies will still be required to maintain and submit retirement packages in accordance with applicable Federal law on records management, including 5 C.F.R. § 293.103, 36 C.F.R. § 1234, and the Business Records Act (BRA).

*OPM recognizes that agency employees who are responsible for submitting and certifying retirement applications will have to work with their IT departments to make sure that all validation and storage requirements are met for the acceptable electronic signatures/digital signatures outlined in*

*this BAL. It is imperative that agencies only submit electronic signatures/digital signatures to OPM that they can validate and that are being properly stored. OPM may need proof of agency verification and storage for any litigation that may arise in any retirement application or associated form.*

Agencies should also ensure that the digital signature technologies and methods they adopt are compliant with Federal disability access requirements. Agency staff should be trained to use any of the accessibility features embedded in agency software and should be capable of assisting Federal employees with disabilities on how to submit a digitally signed document and application.

Agencies should continue to follow the electronic submission requirements outlined on [BAL 12-102](#). This BAL does not supersede BAL 12-102.

## **The Federal Employees' Group Life Insurance (FEGLI) Forms**

FEGLI forms must be processed in accordance with BAL 22-203, *Changes to Acceptable Signature Requirements for Federal Employees' Group Life Insurance (FEGLI) forms*, which provides guidance to agencies on methods to sign, certify and process most commonly used FEGLI forms. This includes, but is not limited to, the SF 2821 (Agency Certification of Insurance Status) and SF 2823 (Designation of Beneficiary).

For questions related to the guidance outlined on this BAL, please contact the Benefits Officer Development & Outreach group at [benefits@opm.gov](mailto:benefits@opm.gov) or call (202) 606-0788.

Sincerely,

Margaret Pearson  
Associate Director  
Retirement Services

3 Encls.:

- 1 Appendix A, Acceptable Forms with Electronic/Digital Signatures
- 2 Appendix B, Examples of Acceptable Electronic/Digital Signatures
- 3 Common questions concerning Permanent Changes to Acceptable Signature Requirements on Retirement Processing Forms

## Appendix A - Acceptable Forms with Electronic Signatures from Agencies and Payroll Offices<sup>i</sup>

### Forms Certified by Agency Representatives Only

Form Number/Name	Number of Required Signatures	Agency and/or Payroll Office Signature	Other Signature (i.e., Notary, Financial Institution)	Special Requirements
<a href="#">SF 2806-1, Notice of Correction of Individual Retirement Record</a>	1	x		Sent to OPM from Payroll Provider
<a href="#">SF 2810, FEHB Notice of Change in Health Benefits Enrollment</a>	1	x		
<a href="#">SF 2821, Agency Certification of Insurance Status (FGLI)</a>	2	x		There is no requirement that a certifying official cannot provide a facsimile signature
<a href="#">SF 3100, FERS Individual Retirement Record</a>		x		No signature slot, normally stamped and sent electronically
<a href="#">Notification to OPM of Reemployment of Annuitant</a>	1	x		Form must be completed and submitted to OPM according to the guidance on <a href="#">BAL 19-107</a>
<a href="#">Notification to OPM of Separation of a Reemployed Annuitant - No Benefits Payable</a>	1	x		Form must be completed and submitted to OPM according to the guidance on <a href="#">BAL 19-107</a>
<a href="#">RI 20-81, Request for Additional Information</a>	1	x		For OPM use only
<a href="#">RI 20-89, Verification of Military Retired Pay Status</a>	1	x		For OPM use only; form must be signed by Military Service retirement payroll providers

<b>Form Number/Name</b>	<b>Number of Required Signatures</b>	<b>Agency and/or Payroll Office Signature</b>	<b>Other Signature (i.e., Notary, Financial Institution)</b>	<b>Special Requirements</b>
<a href="#">RI 20-124, Certification of Service Performed as a Law Enforcement Officer, Firefighter, Nuclear Materials Courier, customs and Border Protection Officer (535 Service), or Air Traffic Controller</a>	1	x		Agencies must complete this form whenever an employee, who has performed service in one of these special provision categories, separates from the agency for any reason, including resignation, transfer, retirement (including disability retirement), and death
<a href="#">RI 38-133, Certification for Title 38 Physicians and Dentists of the Department of Veterans Affairs</a>	1	x		Only used for information on individuals receiving Special Pay under Chapter 74 of Title 38, U.S. Code
<a href="#">RI 79-08, Health Benefits Information Request</a>	1	x		For OPM use only

Forms Certified by both Applicants and Agency Representatives

<b>Form Number/Name</b>	<b>Number of Required Signatures</b>	<b>Applicant Signature</b>	<b>Agency and/or Payroll Office Signature</b>	<b>Other Signature (i.e., Notary, Financial Institution)</b>	<b>Special Requirements</b>
<a href="#">SF 2800A, CSRS Documentation and Elections in Support of Application for Death Benefits</a>	2	x	x		



<b>Form Number/Name</b>	<b>Number of Required Signatures</b>	<b>Applicant Signature</b>	<b>Agency and/or Payroll Office Signature</b>	<b>Other Signature (i.e., Notary, Financial Institution)</b>	<b>Special Requirements</b>
<a href="#">SF 2801, CSRS Application for Immediate Retirement</a>	3 - 6	x	x	x	The <i>Spouse's Consent to Survivor Election</i> section of this form must be notarized and signed by the applicant's spouse when applicable; applicants may use remote/electronic notaries <sup>ii</sup>
<a href="#">SF 2802, CSRS Application for Refund of Retirement Deductions</a>	2 - 4	x	x	x	Certification from financial institution is required if rollover is elected; spouse/former spouse and witness signatures are required
<a href="#">SF 2804, CSRS Application to Make Voluntary Contributions</a>	2	x	x		
<a href="#">SF 2805, Request for Recovery of Debt Due to the United States</a>	2		x	x	
<a href="#">SF 2809, FEHB Health Benefits Election Form</a>	2	x	x		For Active Federal Employees only
<a href="#">SF 2817, Life Insurance Election (FEGLI)</a>	2	x	x		

<b>Form Number/Name</b>	<b>Number of Required Signatures</b>	<b>Applicant Signature</b>	<b>Agency and/or Payroll Office Signature</b>	<b>Other Signature (i.e., Notary, Financial Institution)</b>	<b>Special Requirements</b>
<a href="#">SF 2823, Designation of Beneficiary (FEGLI)</a>	4	x	x	x	Applicant may have two individuals witness their signature through a virtual environment; agency personnel may witness the execution of the SF 2823 as long as they are not named as beneficiaries
<a href="#">SF 3102, CSRS and FERS Designation of Beneficiary</a>	4	x	x	x	Applicant may have two individuals witness their signature through a virtual environment; agency personnel may witness the execution of the SF 3102 as long as they are not named as beneficiaries
<a href="#">SF 3104B, FERS Documentation and Elections in Support of Application for Death Benefits</a>	2 - 3	x	x	x	Certification from financial institution is required if rollover is elected
<a href="#">SF 3106, FERS Application for Refund of Retirement Deductions</a>	2 - 4	x	x	x	Certification from financial institution is required if rollover is elected; spouse/former spouse and witness signatures are required

<b>Form Number/Name</b>	<b>Number of Required Signatures</b>	<b>Applicant Signature</b>	<b>Agency and/or Payroll Office Signature</b>	<b>Other Signature (i.e., Notary, Financial Institution)</b>	<b>Special Requirements</b>
<a href="#">SF 3107, FERS Application for Immediate Retirement</a>	3 - 6	x	x		The <i>Spouse's Consent to Survivor Election</i> section of this form must be notarized and signed by the applicant's spouse when applicable- applicants may use remote/electronic notaries <sup>ii</sup>
<a href="#">SF 3108, FERS Application to Make Service Credit Payment</a>	3	x	x		
<a href="#">SF 3112, Documentation in Support of Disability Retirement Application</a>	3	x	x	x	
<a href="#">SF 3116, Phased Employment, Phased Retirement Status</a>	2	x	x		
<a href="#">FE-6 DEP, Statement of Claim, Option C (FEGLI)</a>	2	x	x		Please see BAL 22-203 for special submission requirements

## List of Forms Certified by Applicants Only

<b>Form Number/Name</b>	<b>Number of Required Signatures</b>	<b>Applicant Signature</b>	<b>Other Signature (i.e., Notary, Financial Institution)</b>	<b>Special Requirements</b>
<a href="#">SF 2800, CSRS Application for Death Benefits</a>	1	x		
<a href="#">SF 2818, Continuation of Life Insurance Coverage as an Annuitant or Compensationer (FEGLI)</a>	1	x		
<a href="#">SF 2819, Notification of Conversion Privilege (FEGLI)</a>	2	x	x	Please see BAL 22-203 for special submission requirements
<a href="#">SF 3104, FERS Application for Death Benefits</a>	1	x		
<a href="#">RI 10-125, Federal Employee Retirement Coverage Corrections Act (FERCCA) Election Form</a>	1	x		
<a href="#">RI 16-28, Authorization for Direct Payments</a>	1	x		
<a href="#">RI 20-07, Representative Payee Application</a>	2	x	x	Additional documentation may be necessary as required by <a href="#">RI 30-3, Information Necessary for a Competency Determination</a>
<a href="#">RI 20-63, Survivor Annuity Election for a Spouse</a>	1	x		
<a href="#">RI 20-64, Survivor Annuity Election for a Former Spouse</a>	2	x	x	Instructions for this form can be found on <a href="#">RI 20-64B, Information on Electing a Survivor Annuity for Your Former Spouse (CSRS)</a>

<b>Form Number/Name</b>	<b>Number of Required Signatures</b>	<b>Applicant Signature</b>	<b>Other Signature (i.e., Notary, Financial Institution)</b>	<b>Special Requirements</b>
<a href="#">RI 20-64A, Former Spouse Survivor Annuity Election</a>	2	x	x	This form must be notarized and signed by the applicant's current spouse if retiree is married
<a href="#">RI 20-84, Civilian Deposit Election Letter</a>	1	x		For OPM use only
<a href="#">RI 20-97, Estimated Earnings During Military Service</a>	1	x		
<a href="#">RI 25-14, Self-Certification of Full-Time School Attendance</a>	1	x		
<a href="#">RI 25-41, Initial Certification of Full-Time School Attendance</a>	1	x		
<a href="#">RI 25-51, CSRS Survivor Annuitant Express Pay Application for Death Benefits</a>	1	x		
<a href="#">RI 76-10, Assignment of Life Insurance (FEGLI)</a>	3	x	x	Applicant may have two individuals witness their signature through a virtual environment; agency personnel may witness the execution of the RI 76-10 as long as they are not named as assignees
<a href="#">RI 76-15, Election to Convert Option C - Family Life Insurance</a>	1	x		For OPM use only
<a href="#">RI 79-9, Health Benefits Cancellation or Suspension Confirmation</a>	2	x		
<a href="#">RI 92-19, Application for Deferred or Postponed Retirement</a>	1 - 4	x	x	Schedule A of this application must be notarized and signed by the applicant's spouse if applicable; applicants may use remote/electronic notaries <sup>ii</sup>

<b>Form Number/Name</b>	<b>Number of Required Signatures</b>	<b>Applicant Signature</b>	<b>Other Signature (i.e., Notary, Financial Institution)</b>	<b>Special Requirements</b>
<a href="#">RI 92-25, Final Action for FERS Deposit and/or Redeposit Payment Election</a>	4	x		For OPM use only
<a href="#">RI 94-07, Death Benefit Payment Rollover Election</a>	3	x	x	For OPM use only; certification from financial institution is required if rollover is elected
<a href="#">RI 98-07, Social Security Disability Benefits Information Request</a>	1	x		For OPM use only
<a href="#">FE-6, Claim for Death Benefits (FEGLI)</a>	1	x		Please see BAL 22-203 for special submission requirements
<a href="#">OPM 1496, CSRS Application for Deferred Retirement</a>	1 - 5	x	x	For separations before October 1, 1956, only; schedule B of this form must be notarized and signed by the applicant's spouse if applicable; applicants may use remote/electronic notaries <sup>ii</sup>
<a href="#">OPM 1496A, CSRS Application for Deferred Retirement</a>	1 - 4	x	x	For separations on or after October 1, 1956, only; schedule B of this form must be notarized and signed by the applicant's spouse if applicable; applicants may use remote/electronic notaries <sup>ii</sup>
<a href="#">OPM 2809, Health Benefits Election Form</a>	2	x	x	For annuitants, survivor annuitants, former spouses, or children and former spouses who are eligible for temporary continuation of coverage (TCC) use only; certified by OPM

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<sup>i</sup> For more information on the Office of Management and Budget's Regulatory Review of forms, please visit [The Office of Information and Regulatory Affairs' website](#).

<sup>ii</sup> Applicants may use remote/electronic notaries. Visit [The National Notary Association's website](#) for more information and guidance on remote online notarization.

# Appendix B - Examples of Acceptable Electronic/Digital Signatures

## Example #1

Electronic Signatures on documents submitted by agencies:



## Example #2

Forms signed using a verifiable digital signing certificates (ex. Personal Identity Verification (PIV), Common Access Cards (CAC), other digital certificate technologies):

Yes                       No

<b>Applicant's Certification</b>		
<i>I certify that all statements made on these schedules are true to the best of my knowledge and belief.</i>	Signature (do not print)	Date (mm/dd/yyyy)





### Example #3

Electronic Signatures through a third-party digital certificate-base signing software:



## **Common questions concerning Permanent Changes to Acceptable Signature Requirements on Retirement Processing Forms**

### **1. What does OPM mean by allowing “electronic” and “digital” signatures on retirement processing forms?**

OPM will now accept forms and documents included in a retiree’s retirement package to be electronically or digitally signed. The term “digital signature” means a signature that has been created by software that contains an authentication certificate and includes the individual’s name, date and time of signature. Examples of these types of software include Adobe Acrobat or DocuSign. The term “electronic signature” means electronic forms/documents that contain a “wet” or digital signature, that is made into a photocopy, converted to a PDF or other type of electronic document, and then submitted to OPM. The two terms—i.e., “digital signature” and “electronic signature”—may be used interchangeably throughout this BAL and in accordance with 5 C.F.R. § 850.106.

### **2. Is everyone required to submit retirement forms containing electronic signatures?**

No, employees and agency personnel including Payroll offices, may still submit original retirement forms, including but not limited to the forms listed on Appendix A, containing valid signatures or photocopies of signed documents directly from an official system of records in the custody of the agency according to the procedures listed on [BAL 12-102](#).

### **3. When should employees sign the forms electronically?**

Employees are not required to sign retirement forms electronically. Signing the forms with electronic or digital signatures is optional; applicants may use this option only when they are not able to sign the documents with a “wet,” “pen-and-ink” or handwritten physical signature. Agencies are encouraged to create procedures that outline when employees should use “wet” signatures on forms/documents. The

procedures should follow protocols from the [Safer Federal Workforce Task Force's guidance](#) on keeping employees and agencies operating safely during the COVID-19 pandemic.

#### **4. How can employees and agencies sign the forms electronically/digitally?**

Most OPM retirement forms are Adobe Acrobat fillable forms and may be completed and signed by PIV/CAC authentication. Other types of third-party software used to complete the forms or documents will dictate the electronic/digital signature method used to sign the form. Regardless of the method used, the electronic record must be tamper-proof once it is electronically signed in accordance with [15 U.S.C. §§ 7001, 7021, and 7031](#). The most common methods used to capture an electronic signature include:

- A handwritten signature input on a display screen using a stylus device
- A digitized image of a handwritten signature that is attached to an electronic record
- A PIV/ CAC authenticated digital signature.

#### **5. What if the form I want to submit with an electronic or digital signature is not listed on Appendix A?**

Employees should contact their Agency's benefits office to inquire about whether a particular form not listed on Appendix A can be submitted using an electronic or digital signature. Benefits offices should contact their Headquarters level Benefits Officers for additional guidance. Agency Benefits Officers are encouraged to contact their assigned OPM liaison for guidance on submitting specific forms or documents not referenced or listed on this BAL.

**6. Can retirement forms/documents containing electronic/digital signatures be submitted through alternate methods besides regular mail or the Secure Drop Box (i.e., text message)?**

No. At this time, OPM has not established an alternate process to accept such forms/documents through any other submission method. Agencies should continue to follow the existing process to [report the death of a Federal employee](#) or submit [reemployed annuitant](#) and [Phased Employment/Phased Retirement](#) notifications.

**7. How do Agencies ensure they are following 15 U.S.C. §§ 7001, 7021, and 7031 in facilitating the use of electronic records and signatures?**

The head of each agency must establish internal guidelines and procedures to accept and validate electronic signatures on retirement and benefit forms. Agencies should use adequate IT systems that can properly maintain documents that contain electronic signatures and ensure the records are created and kept in a secure environment that protects the records from unauthorized modification or destruction.

**8. How does this BAL differ from OPM's recent guidance on changes to retirement application processing while operating under COVID-19?**

This BAL expands the flexibility to submit retirement application forms with electronic signatures including the FERS/CSRS Designation of Beneficiary (SF 3102 and SF 2808), the SF 2823, Designation of Beneficiary (FEGLI), and the SF 2818, Continuation of Life Insurance Coverage (FEGLI). This BAL also adds the flexibility for electronic signatures to be created through a third-party software, such as DocuSign, HelloSign, Adobe Sign, or other agency approved third-party software. Additionally, this BAL removes the requirement for payroll offices to use OPM's secure electronic drop box to upload scanned retirement packages. The secure drop box has been disabled and can no longer be used to submit retirement documents.

**9. Can a current or former federal employee submit an electronically signed document to OPM's Retirement Services without going through their agency?**

No, this BAL requires that all electronically signed forms must be validated and stored by the employing agency. Retirement Services does not currently accept digital signatures directly from employees, former employees, annuitants, or their survivors.