

## **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.