



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

Benefits Administration Letter

Number: 22-203

Date: March 14, 2022

Subject: Changes to Acceptable Signature Requirements for Federal Employees' Group Life Insurance (FEGLI) Forms

Healthcare and Insurance previously published [BAL 21-203, *Forms Processing During Disruption of Agency Operations*](#), on May 25, 2021 to provide guidance to agencies on how to process FEGLI forms during the disruption to normal agency operations due to the COVID-19 pandemic.

This Benefits Administration Letter (BAL) communicates new changes to signature requirements for the FEGLI Program and supersedes [BAL 21-203](#).

Acceptance of Electronic Signatures on FEGLI Forms

The Office of Personnel Management (OPM) will now permanently allow the use of electronic and digital signatures on all FEGLI forms submitted to employing agencies and OPM's Retirement Services. Agencies are encouraged to implement the new changes effective immediately.

Electronic signatures are defined as electronic forms or 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 may be used interchangeably throughout this BAL and in accordance with 5 C.F.R. § 850.106.

These changes are made in accordance with [Title 5, Code of Federal Regulations § 850.106](#), which allows electronic signatures on forms related

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to federal retirement and benefit programs. Forms submitted in accordance with this BAL will be accepted as valid, and no additional documentation regarding signatures will be required. If the requirements for valid electronic signatures are not met, agencies will be expected to resubmit documentation that is consistent with the new electronic signature requirements for FEGLI forms.

OPM will continue to monitor the potential risk regarding the use of electronic and/or digital signatures and reserves the right to make changes to this policy as conditions change.

FEGLI Forms That Will Now Allow Electronic Signatures

OPM will accept electronic and/or digital signatures from active employees, Human Resources personnel, Payroll office personnel, and witnesses to certify the following FEGLI forms:

FEGLI Form	Acceptance of Electronic Signature	Requirements
SF 2817, Life Insurance Election	Yes	
SF 2818, Continuation of Life Insurance Coverage as an Annuitant or Compensation	Yes	
SF 2819, Notification of Conversion Privilege	Yes	
SF 2821, Agency Certification of Insurance Status	Yes	
SF 2822, Request for Insurance	Yes	

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FGLI Form	Acceptance of Electronic Signature	Requirements
SF 2823, Designation of Beneficiary	Yes	<p>Insureds can have two individuals witness their signatures through a virtual environment.</p> <p>Agency personnel may witness the execution of the SF 2823 as long as they are not named as the beneficiary.</p>
RI 76-10, Assignment of Life Insurance	Yes	<p>Insureds can have two individuals witness their signatures through a virtual environment.</p> <p>Agency personnel may witness the execution of the RI 76-10 as long as they are not named as an assignee.</p>
FE-6, Claim for Death Benefits	Yes	
FE-6 DEP, Statement of Claim, Option C	Yes	

Acceptable Methods of Electronic and/or Digital Signatures

OPM will now accept a wide range of electronic and digital signatures on all FGLI forms. Acceptable electronic signature methods include:

1. Personal Identity Verification (PIV) or Common Access Cards (CAC) certificate authenticated signatures (PDF documents may be signed using the PIV/CAC method and then be printed. Please see [BAL 12-102](#) for more information on acceptance of photocopies and scans of signed documents).
2. Electronic or digital signatures signed in accordance with [15 U.S.C. §§ 7001, 7021, and 7031](#) (please see the requirements listed below) submitted by agencies which must keep the associated record that reflects the process by which the signatures were created.
3. Signatures created through a third-party software, such as DocuSign, HelloSign, Adobe Sign, or other agency approved third-party software.

The electronic signature created must comply with [15 U.S.C. §§ 7001, 7021, and 7031](#).

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 major 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 expressed 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** – In order 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 contract or record. Agencies can accomplish this by following the standards of [OPM’s Guide to Personnel Recordkeeping](#).

Agencies should ensure that the digital signature technologies and methods adopted 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.

Recommended Steps Agencies Should Follow To Ensure That Electronically Signed Documents Are Valid And Trustworthy

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.

Common questions about electronic signatures for FEGLI forms

1. What does OPM mean by allowing “electronic” and “digital” signatures on FEGLI forms?

OPM will now accept FEGLI forms included as part of a 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 or 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 may be

used interchangeably throughout this BAL and in accordance with 5 C.F.R. § 850.106.

2. Are electronic signatures required on FEGLI forms?

No. The use of an electronic signature to sign FEGLI forms is optional. Employees and agency personnel may still sign FEGLI forms with a “wet signature” or submit photocopies of signed documents directly from an official system of records in the custody of the agency.

The use of an electronic signature is available to employees who have the ability to sign or certify FEGLI forms electronically and would like to do so.

3. Who is allowed to submit forms with electronic/digital signatures?

Employees, agency personnel, and witnesses, as applicable, are allowed to electronically sign FEGLI forms or other types of non-agency transaction when such signatures are required on those forms.

4. How can employees and agencies sign the forms electronically or digitally?

Most FEGLI forms are Adobe Acrobat fillable forms and may be completed and signed by PIV or CAC authentication. Employees, and witnesses who use other third-party software will need to follow the instructions in accordance with the digital signature software being used. 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](#).

Agency personnel must use a government issued PIV/CAC card. Please see Attachment A for instructions on how to sign FEGLI forms using a PIV/CAC card.

5. Can FEGLI forms containing electronic and/or digital signatures be submitted through alternate methods besides regular mail (i.e., email or fax)?

No. OPM has not established an alternate process to accept FEGLI forms through any other submission method.

6. What if an employee does not have a PIV or CAC card?

Employees and witnesses who use other third-party software will need to follow the instructions in accordance with the digital signature software being used.

7. Can annuitants sign FEGLI forms electronically or digitally?

No. Electronic or digital signatures are not available to annuitants at this time, because annuitants no longer have PIV or CAC cards from their former government agency and the agency must retain the administrative record for these signatures. We hope to allow the ability for annuitants to sign documents digitally in the future and will continue to assess the various types of acceptable signatures that would be acceptable for this purpose.

If you have any questions regarding this BAL, please contact the Life and Ancillary Benefits group at FEGLI@opm.gov or call (202) 606-1413.

Sincerely,

Laurie Bodenheimer
Associate Director
Healthcare and Insurance

Enclosure:

Attachment A, Digital Signature Instructions