



Benefits Administration Letter (BAL)

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Subject: Temporary Changes to Retirement Application Processing While Operating Under Coronavirus Disease (COVID-19) Telework Policies.

Contents

Preface: Temporary Changes to Retirement Application Processing While Operating Under Coronavirus Disease (COVID-19) Telework Policies	2
Contacting OPM Regarding Operations During COVID-19:	2
Requirements for Submitting a Valid Retirement Package Electronically:.....	2
Agency Chain of Custody Process.....	2
Signature Requirements.....	3
Evidence of Chain of Custody:	3
Secure Drop Box for Retirement Applications:	4
Accessing OPM's Secure Drop Box.....	4
Types of Retirement Applications Accepted Through OPM's Drop Box	4
Retirement Package Requirements	4
Supporting Customers if a Payroll Office is Closed but can Still Submit Data Exchange Gateway (DEG) Files	5
The Federal Employees' Group Life Insurance (FEGLI) Forms.....	5
Forms with Special Requirements.....	6

Preface: Temporary Changes to Retirement Application Processing While Operating Under Coronavirus Disease (COVID-19) Telework Policies

In response to COVID-19, many Federal agencies are operating under varying levels of telework. If possible, agencies should continue to submit retirement applications as they normally would. However, in order to support increasing levels of telework and to give Human Resource and Payroll Offices the flexibility to submit retirement applications, the Office of Personnel Management (OPM) is allowing certain flexibilities.

Effective May 26, 2020, OPM is **temporarily** suspending requirements to submit paper documents with wet signatures for **agency-submitted** immediate retirement applications and death in service cases. Agencies and Payroll offices may prepare and submit retirement applications as described below. During this temporary situation, applications submitted in accordance with this BAL will be accepted as valid and no additional documentation will be required. Retirement applications are not valid if they are not submitted in accordance with this BAL, contain incorrect information, or are otherwise incomplete. If a retirement application is not valid, agencies will be required to resubmit documentation. Once OPM lifts these temporary measures, agencies will be expected to begin submitting retirement packages as normal. Agencies can submit applications using their normal procedures even while these temporary guidelines are in place.

Many of the electronic submission requirements described in this BAL originate from [BAL 12-102](#). This BAL does not supersede [BAL 12-102](#).

OPM will continue to monitor the COVID-19 situation. This BAL will be rescinded once OPM determines normal operations can resume.

Contacting OPM Regarding Operations during COVID-19:

Questions regarding retirement application submission during COVID-19 operations should be directed to your agency's Benefits Officer (<https://apps.opm.gov/abo/>). Agency Benefits Officers should contact their OPM liaison at benefits@opm.gov or 202-606-0788.

Requirements for Submitting a Valid Retirement Package Electronically:

Retirement applications submitted pursuant to the below policies will be considered valid and require no additional paper submission.

Agency Chain of Custody Process

Under this temporary measure, OPM will accept scanned retirement application packages in a PDF format. For a retirement package to be valid, it must be maintained and submitted in accordance with applicable Federal law on records management, including the Business Records

Act (BRA). The BRA requires agencies to use written procedures that establish a chain of custody for submitted documents. The agency's procedures should include:

1. a record of the origin of each document submitted, who sent the document, how the document was sent, and which documents were sent together;
2. if scanning an original paper document, a process by which an agency official compares the original document to the scanned or electronic document; and
3. a certification from the document custodian (for these purposes only, OPM considers the agency submitting the retirement application to be the document custodian) attesting that the documents were produced within the context of the written records management procedures as prescribed in 5 C.F.R. § 293.103, 36 C.F.R. § 1234, and the BRA.

Note – If a document is completed fully by electronic means and submitted to OPM as an original, the above chain of custody process is not required for that document. For example, an SF-3107 (FERS application for immediate retirement) would be considered original if an agency, Payroll Office, and applicant completed their sections by entering data directly into the PDF form, PDF signing the appropriate section, and then passing the form along to other appropriate parties via email or shared drive.

Signature Requirements

Applicants for retirement **must** sign the appropriate retirement application (SF-3107, SF-2801, SF-3104, or SF-2800). OPM will not accept applications without one of the signature types below (e.g. signature blocks with “national emergency, signature not available” are not acceptable). Under this temporary measure OPM will accept applicant and agency signatures only in the following formats:

1. Original ink signatures.
2. Scanned ink signatures – Documents may be signed in ink and then scanned by the submitting agency.
3. “Printed” PDF signatures using PIV or CAC – PDF documents may be signed using PIV/CAC method and then printed and scanned by the agency.
4. PDF signatures using PIV or CAC – PDF documents may be signed using PIV/CAC method and then included in a retirement package submission.

Evidence of Chain of Custody:

Agencies must ensure the retirement application package chain of custody stays intact by adhering to the following:

1. The document is directly submitted to OPM by a Payroll Office through Government email (e.g., .gov, .mil).
2. In accordance with [BAL 12-102](#), documents contained within a retirement or death in service application package must include an agency checklist that clearly shows that the application package includes the document/s in question. For example, the agency checklist (Schedule D) indicates the following forms (for which OPM would normally require an original signature) are included in the package: SF 3107, SF 2801, SF 2801-2, SF 3107-2, SF 3106, SF 2803, SF 3112, SF 2823, SF 3104, SF 3104B, SF 2800 and SF 2800A. The agency checklist must be signed by the agency personnel official handling the documents and there must be a telephone contact and email address for this agency official.

Secure Drop Box for Retirement Applications:

Payroll Offices may use OPM's secure electronic drop box to upload scanned retirement packages. Access to OPM's drop box will only be granted to Payroll Offices.

Accessing OPM's Secure Drop Box

Payroll Office leadership should contact OPM's Benefits Officer Liaison and Development group at benefits@opm.gov or 202-606-0788 to establish access to OPM's portal.

- Each Payroll Office will be permitted to select a limited number of representatives that will officially submit retirement applications via the portal. Access to the OPM portal will be restricted to those designated by leadership at each Payroll Office.
- Only Payroll Offices can submit retirement packages through OPM's portal.

Types of Retirement Applications Accepted through OPM's Drop Box

OPM will accept the following types of retirement applications along with the application's required supporting documentation:

- Immediate retirement packages (SF-2801/SF-3107 and supporting documentation)
- Disability retirement packages (SF-2801/SF-3107/SF-3112 and supporting documentation)
- Death in service packages (SF-2800/SF-3104 and supporting documentation)

Retirement Package Requirements

All applications submitted to OPM's secure drop box must be prepared in accordance with the following requirements:

- The Data Exchange Gateway (DEG) file remains unchanged and must be submitted in the normal method.
- Each scanned submission must be named with the register number and source – for instance: **OPM 202001 – NFC**.
- Each submission must include the scanned register and the retirement documents listed on the register.
- Each scanned document must mimic the physical register/records that OPM currently receives.
 - The first page must be the completed SF-3103/2807 (Register of Separations and Transfers) identifying the retirement packages contained in the scanned document.
 - Retirement packages should follow the SF-3103/2807 in the order they appear on the SF-3103/2807.
- Each retirement package must be separated by a blank sheet
- Scanned packages must be in PDF format.
- Retirement applications must be sent using the existing method, in groups associated with the corresponding register.

Supporting Customers when a Payroll Office is Closed and only Submitting DEG Files

OPM cannot finalize retirement payments if a Payroll Office is unable to submit retirement packages by mail or through OPM's drop box. However, if a Payroll Office still has the capability to send a DEG file, OPM will process the DEG file and initiate interim payments, if possible. It is important that payroll centers submit accurate and complete DEG files to limit potential interim pay overpayments. OPM will finalize adjudication of the retirement claim upon receipt of a valid retirement package. That is, a retirement package submitted using normal methods or one submitted in accordance with this BAL.

The Federal Employees' Group Life Insurance (FEGLI) Forms

FEGLI forms must be processed in accordance with [BAL 20-201](#):

Agencies should continue to accept, and process forms related to FEGLI. Agencies may accept documents by fax or email, with the original to follow as soon as practicable. This includes, but is not limited to, the SF 2821 (Agency Certification of Insurance Status) and SF 2823 (Designation of Beneficiary). Although the SF 2821 indicates in signature blocks 15a and 16a that a facsimile of the certifying official's signature is not acceptable, OPM is temporarily suspending this requirement when necessary for an agency to complete timely processing of this form. FEGLI regulations at 5 C.F.R. § 870.802 (b) allow agencies to determine the appropriate methods for receipt of the FEGLI Designation of Beneficiary form.

Forms with Special Requirements

Certain forms submitted with retirement packages have special requirements. Below is a table of those and a description of how each form must be submitted.

Form Number/Name	Special Requirements	Submission During COVID-19
Spouse's Consent to Survivor Annuity (SF 3107-2 & SF 2801-2)	This form must be completed in front of a notary (notarized).	Applicants may use remote/electronic notaries. Visit https://www.nationalnotary.org/notary-bulletin/blog/2018/06/remote-notarization-what-you-need-to-know for guidance on remote and electronic notaries. If the applicant's state of residence does not support remote notary, the applicant may submit a notarized spousal consent up to 30 days after OPM rescinds this BAL.
FERS/CSRS Designation of Beneficiary (SF 3102 & SF 2808)	This form must be completed in front of two witnesses.	Human Resources staff may witness the execution of this form.
SF 2823	This form must be completed in front of two witnesses.	Human Resources staff may witness the execution of this form.
Court Orders – wage garnishments	Scanned copies are acceptable.	N/A
Court Orders – division of CSRS and FERS annuity and survivor benefits	Court orders must be submitted as original court certified documents. (OPM will accept copies to award benefits, but payment based on the order will not occur until the original certified order is received).	Applicants may visit https://www.cdc.gov/nchs/w2w/index.htm for guidance on obtaining Death/Marriage/Birth Certificates and Divorce Decrees.
Death Certificates	Copies are acceptable.	
Marriage Certificates	Copies are acceptable.	