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DEFENSE CIVILIAN PERSONNEL ADVISORY SERVICE
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FOR: CIVILIAN PERSONNEL POLICY COUNCIL MEMBERS

FROM: Defense Civilian Personnel Advisory Service Director, Ms. Michelle LoweSolis

SUBJECT: Temporary Changes to Retirement Application Processing While Operating Under
Coronavirus Disease Telework Policies

ACTION: Disseminate to Department of Defense (DoD) Human Resources Practitioners

REFERENCES:

- a. Office of Personnel Management Benefits Administration Letter 12-102, "Acceptance of Photocopies of Signed Documents in Retirement Application Packages and other Agency Submissions," dated May 25, 2012, <https://www.opm.gov/retirement-services/publications-forms/benefits-administration-letters/2012/12-102.pdf>
- b. Office of Personnel Management, Benefits Administration Letter 20-201, "Insurance Benefits Processing During Disruption of Normal Agency Operations," dated March 25, 2020, <https://www.opm.gov/retirement-services/publications-forms/benefits-administration-letters/2020/20-201.pdf>
- c. Appendices A, B, and C: Establishing the Chain of Custody, DFAS Retirement Packages Submission, and Signature and Form Requirements (attached)
- d. DCPAS Questions and Answers, "Insurance Benefits Processing During Disruption of Normal Agency Operations" (attached)
- e. OPM Authorized Flexibilities if Necessary to Complete Timely Processing During COVID-19 (attached)

BACKGROUND/INTENT: The Office of Personnel Management (OPM) issued updated guidance in the Benefits Administration Letter (BAL) 20-201, referenced above, regarding temporary changes to retirement application processing during the coronavirus disease public health emergency that temporarily suspends certain processing requirements.

The attached Appendix A lists both the suspended processing requirements, as well as the requirements for establishing a chain of custody. Appendix B describes the DFAS retirement packages submission process and the use of OPM's Portal. Additionally, Appendix C lists the signature and form requirements and Appendix D provides a sample written checklist for agencies to use when complying with the guidelines OPM issued in BAL 12-102 (reference c).

A list of questions and answers regarding BAL 20-201 is attached (reference d), along with a chart of OPM authorized flexibilities (reference e).

APPLICABILITY: Applies to Appropriated Fund Department of Defense civilian employees with retirement coverage under the Civil Service Retirement System (CSRS), to include CSRS Offset, and Federal Employees Retirement System (FERS), to include FERS-Revised Annuity Employees and FERS-Further Revised Annuity Employees, and DoD Nonappropriated Fund employees who retained CSRS or FERS retirement coverage under title 5, U.S. Code, sections 8347(q) and 8461(n).

POINT OF CONTACT: Ms. Canary Scullark, Branch Chief, Benefits, Wage and NAF policy, canary.scullark.civ@mail.mil, (571) 372-1644

Attachment(s):
As Stated

Appendix A: Establishing the Chain of Custody

An agency must establish, via written procedures, a chain of custody for retirement and benefits documentation, as well as accepting retirement and benefits documentation.

OPM requires the following items for establishing the chain of custody procedure:

- A record of where the document originated
- Who sent the document
- How the document was sent
- Which documents were sent together
- A process by which the HR Specialist compares the original document(s) to the photocopied, scanned, or faxed document(s)
 - For example, the HR specialist ensures the document was scanned right side up and is legible.
- A certification from the document custodian (the HR Specialist on behalf of the agency) attesting that the documents were produced within the context of the written records management procedures as prescribed in 5 CFR §293.103, 36 CFR §1234, the Business Records Act, and other guidance defining chain of custody.

OPM will accept photocopies (to include scans and faxes) from agencies¹ that have established a written, chain of custody procedure (as detailed above) when the following conditions are met:

- (1) The document is directly submitted to OPM by the agency through mail, fax, or email (a .mil or .gov email address is required)
- (2) If the document is part of a retirement or death in service package, there must be an agency checklist that clearly shows the submission includes the document. The agency checklist must be signed by the agency personnel handling the documents and there must be a telephone contact and/or email address for the official.
- (3) Scans: OPM already accepts scanned documents maintained in eOPF. OPM will accept PIV/CAC card signature(s) by the HR Specialist.

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. During this time, agencies and payroll offices may prepare and submit retirement applications electronically, provided that they have established a written, chain of custody procedure as described above, and are submitting electronic retirement documentation in PDF format. (Per OPM: no chain of custody procedure is required for documents completely executed by electronic means, such as a fillable PDF, and submitted to directly to OPM as an original document.)

¹ *Nota Bene:* these procedures are for agencies only. OPM will continue to require “wet” signature when they originate from a non-agency source (such as a spouse, former spouse, or annuitant).

Appendix B: Defense Finance Accounting Service (DFAS) Retirement Packages Submission

DFAS will continue to use regular business procedures to process retirement package submissions. While OPM has established a secure electronic drop box (the portal) to upload scanned retirement packages. Be advised that Payroll offices are not required to use the OPM Portal. OPM's preferred method of delivery for retirement packages is to use the current business process. For agencies unable to mail retirement packages to DFAS, packages can be submitted to DFAS using Remedy or goDocs. Remedy must be submitted by the individual employee and is the preferred method for submitting retirement packages to DFAS. Remedy allows up to five (5) attachments, and will accept the file attachments in a compressed (zipped) format. For extremely large retirement packages that may exceed the limitations of the Remedy system: attach documents that require electronic signature to Remedy and send the remaining documents to goDocs at (866) 401-5849. Please annotate if additional documents are sent to goDocs in the Remedy ticket when submitted.

Appendix C: Signature and Form Requirements

Under the temporary measures set forth in BAL 20-102, OPM will accept the following types of applicant and agency signatures:

- (1) Original ink signatures
- (2) Scanned ink signatures (documents are signed in ink and then scanned by the agency)
- (3) PIV/CAC card signatures on fillable PDF documents that are then printed and scanned by the agency
- (4) PIV/CAC card signatures on fillable PDF documents and then included in a retirement package submission.

Certain forms submitted with retirement packages have special requirements. During the public health emergency, OPM is permitting suspension of certain requirements, as noted below:

- (1) Spouse's Consent to Survivor Annuity (SF 3107-2 and SF 2801-2): applicants may use electronic/remote notaries. Applicants should check <https://www.nationalnotary.org/notary-bulletin/blog/2018/06/remote-notarization-what-you-need-to-know> for guidance in their state or area. If the applicant's state of residence does not permit remote notarization, applicants may submit a notarized spousal consent up to 30 days after OPM rescinds BAL 20-102.
- (2) FERS/CSRS Designation of Beneficiary (SF 3102 and SF 2808): Human Resources staff may witness the execution of the form.
- (3) FEGLI Designation of Beneficiary (SF 2823): Human Resources staff may witness the execution of the form.
- (4) Court Orders for wage garnishments: scanned copies are acceptable.
- (5) Court Orders for division of CSRS and FERS annuity apportionments and survivor benefits: OPM will accept copies of the original court certified documents, but will not award payments based on such until the original court certified document is physically received.
- (6) Death and marriage certificates: copies are acceptable.

Appendix D: Sample Written Chain of Custody Checklist for Agencies

This is a sample written checklist for agencies to use when complying with the guidelines OPM issued in BAL 12-102. Agencies may modify as appropriate, provided that they comply with OPM's guidelines.

Note 1: Only employees may submit documentation requiring original signatures; spouses, guardians, conservators, and attorneys may not substitute their signature for that of the employee's.

Note 2: Agencies may wish to print this checklist on agency letterhead when preparing retirement and/or death in service packages. Please be advised that this checklist does not replace the SF 3107 Schedule D for immediate retirement packages, or the SF 3104B for death in service packages. Agencies are still required to use the SF 3107 Schedule D and/or the SF 3104B when preparing and submitting retirement and death in service packages.

Note 3: This checklist does not supersede or otherwise replace the requirements listed in 5 CFR §831.1205 (CSRS) and 5 CFR §844.202 (FERS) for agency-filed disability retirement applications.

SAMPLE

Chain of Custody Checklist

(Append to every received document)

1. Where did the document originate?
 - Mail
 - Employee's office via interoffice mail or in-person
 - Employee's work email (.mil or .gov address)
 - Employee's work fax
 - eOPF
2. How was the document received?
 - Mail
 - Agency fax
 - Agency email address (.mil or .gov address)
 - Agency HR Office via interoffice mail or in-person
 - eOPF
3. Was the document scanned?
 - Yes
 - If yes, has the agency verified the scan is a true and correct copy of the original?
 - No
4. Who sent the document?
 - Employee (includes re-employed annuitants)
 - Other _____ (list name and title/relationship)
5. Is the document:
 - Part of a retirement package/death in service package
 - Or
 - A single submission:
 - SF 2821
 - SF 2818
 - SF 3107/SF 2801
 - SF 2800/SF 3104
 - SF 2803
 - SF 3106
 - SF 3112
6. Does the document bear a watermark?
 - eOPF
 - Other _____ (list agency name)
7. The document with this checklist will be directly sent to OPM via:
 - Email _____ or retire@opm.gov.
 - Fax _____ or (724) 794-4668 (ROC general fax number)
 - Check this box to confirm that OPM was called and the fax was received.
 - Mail
8. I, _____ (name), HR Specialist at _____ (agency name), have reviewed the mailed/scanned/photocopied/faxed document received from _____ (employee name) and certify that the document(s) is a copy of a true original and was produced within the context of the written records management procedures as prescribed in 5 CFR §293.103, 36 CFR §1234, the Business Records Act, and other guidance defining chain of custody.

Name of HR Specialist

Agency Email address

Date

(____)_____

Agency Telephone number



**Benefits Administration Letter 20-201,
"Insurance Benefits Processing During Disruption of Normal Agency Operations"**

Questions and Answers

Q1. Most Department of Defense employees are teleworking due to the Coronavirus Disease (COVID-19), how will we ensure timely processing of retirement and benefits elections?

A1. The Office of Personnel Management (OPM) recently provided COVID-19 processing guidance in Benefits Administration Letter (BAL) 20-201 that suspends the requirement for paper retirement applications and death in service documents with wet signatures during COVID-19. 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" portable document format (PDF) signatures using personal identification verification (PIV) or common access card (CAC) –documents may be signed using PIV/CAC method and then printed and scanned by the agency.
4. PDF signatures using PIV or CAC – documents may be signed using PIV/CAC method and then included in a retirement package submission.

This guidance is in effect until further notice. For additional information on retirement or benefits processing, contact your component or agency Benefits office.

Q2. Do these temporary changes to the OPM retirement application process include postponed and deferred retirement applications?

A2. No. This temporary suspension only applies to **agency-submitted** retirement applications and death in service cases. Federal Employees Retirement System (FERS) or Civil Service Retirement System (CSRS) deferred and postponed retirement applications should be submitted on form RI 92-19 (FERS) or OPM Form 1496A (CSRS) with a wet signature, and mailed directly to OPM for processing.

Q3. How long will OPM allow agencies to use retirement application and death in service processing flexibilities?

A3. OPM will continue to monitor the COVID-19 situation and will rescind BAL 20-201 once they've determined normal operations can resume.

Q4. What happens if our agency submits a retirement or death in service case that is not in compliance with BAL 20-201? Will OPM still process the application during these approved temporary COVID-19 measures?

A4. Retirement applications are not valid if they are not submitted in accordance with the guidance provided in BAL 20-201, contain incorrect information, or are otherwise incomplete. If a retirement application is not valid, agencies will be required to resubmit documentation. To avoid delays in death in service processing, benefits offices will work directly with OPM to ensure required documents are submitted.

Q5. Are there changes to the Federal Employees Health Benefits (FEHB) Program enrollment process during COVID-19?

A5. FEHB enrollment actions will continue to be submitted through normal electronic channels. Agencies required to submit documents directly to FEHB carriers should consider the use of secure email when fax capabilities are not available.

Q6. What if an employee has no available witnesses to sign (SF 3102, SF 2808 or SF 2823) FERS/CSRS/ Federal Employee Group Life Insurance (FEGLI) Designation of Beneficiary forms?

A6. OPM's temporary processing guidance permits human resources specialists to witness and fax Designation of Beneficiary forms, if needed, to ensure timely processing. However, OPM states the original document must be forwarded as soon as practicable.

Q7. Normally the Spouse's Consent to Survivor Annuity (SF 3107-2 & SF 2801-2) must be signed in front of a notary? Are there any exceptions due to COVID-19?

A7. Yes, 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 state of residence does not support remote notary, the applicant may submit the notarized spousal consent within 30 days after the national/local social distancing policies are lifted.

Q8. What are the options available to employees who wish to update their Federal Employee Group Life Insurance forms such as the SF 2823 and SF 2821?

A8. OPM has advised agencies to continue with current electronic methods, if available. If electronic methods are not available agencies may accept fax or email of the SF 2823 and the SF 2821, with the originals to follow as soon as possible. Wet signature on the SF 2823 is still a requirement. The facsimile restriction for the SF 2821 regarding signature boxes 15a and 16a is temporarily suspended.

Q9. Is sending signed forms and documents by email safe?

A9. Employee should use protect their Personally Identifiable Information (PII) by using appropriate methods such as secure email, encryption or password-protection.

OPM Authorized Flexibilities if Necessary to Complete Timely Processing During COVID-19

Program or Process	Normal Agency Operations	Alternate Procedures During COVID-19	Expiration Date	Resources
FEGLI and FEHB Transactions that Require Documentation	<ul style="list-style-type: none"> • Continue current electronic methods • Supporting documentation for family member eligibility or a QLE required for processing 	Proceed with transaction if agency review/verification of documentation for family member eligibility or QLE is not practicable. Agency must track transactions and perform review and verification as soon as practicable to do so. If at that time documentation is not provided, void transaction.	June 30, 2020	BAL 20-201 5 CFR 870.802(b)
Processing of FEGLI Related Forms <i>(including SF 2823 and SF 2821)</i>	<ul style="list-style-type: none"> • Continue current electronic methods, or • Original forms with wet signatures 	May accept documents by: <ul style="list-style-type: none"> • Fax or email, with originals to follow as soon as practicable. <i>Wet signature on original SF 2823 is still required.</i> • SF 2821 facsimile restriction for signature box 15a and 16a is temporarily suspended. 		
FEHB Enrollment Actions	Submitted through normal electronic channels	Continue normal agency operations to the extent possible. Agencies that typically fax documents directly to FEHB Carriers should consider the use of secure email when fax capabilities are not available.		
Agency Submitted Immediate Retirement Application Processing & Death in Service Cases <i>(SF-3107, SF-2801, SF-3104, or SF-2800)</i>	Paper documents with wet signatures or copies in accordance with BAL 12-102	Paper and wet signature requirements are temporarily suspended. May submit electronic retirement packages provided they meet the following policies: <ul style="list-style-type: none"> • Agency Chain of Custody Process • Signature Requirements - Applicants must sign application under the following formats <ul style="list-style-type: none"> ○ Original ink ○ Scanned Ink - signed in ink and then scanned by submitting agency ○ "Printed" PDF using PIV/CAC method - PDF signed using PIV/CAC, then printed and scanned by agency ○ PDF signatures using PIV/CAC method - signed using PIV/CAC and then included in a retirement package submission • Evidence of Chain of Custody 	*BAL will be rescinded once OPM determines normal operations can resume	BAL * 20-201 ; BAL 12-102

<p>Secure Drop Box for Retirement Applications <i>Immediate Retirement Packages</i> (SF-2801/SF-3107 and supporting documentation) <i>Disability Retirement Packages</i> (SF-2801/SF-3107/SF-3112 and supporting documentation) <i>Death in Service Packages</i> (SF-2800/SF-3104 and supporting documentation)</p>	NA	<p>DFAS (Payroll) submission via OPM’s secure drop box is authorized. Review BAL <u>20-102</u> for required format and other details.</p> <p>If Payroll is unable to submit package by mail or drop box, OPM will still process DEG records and initiate interim payments. However, final adjudication will be upon receipt of the final retirement package.</p>		
<p>Accessing OPM’s Secure Drop Box</p> <p>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.</p>	NA	<p><i>Each Payroll Office</i> will be permitted to select a limited number of representatives that will officially submit retirement applications via the portal.</p> <p><i>Access to the OPM portal</i> will be restricted to those designated by leadership at each Payroll Office.</p> <p><i>Only Payroll Offices</i> can submit retirement packages through OPM’s portal.</p>		
<p>Contacting OPM Regarding Operations during COV-19</p>	NA	<p>Questions regarding retirement application submission during COVID-19 operations should be directed to your agency’s Benefits Officer (https://apps.opm.gov/abo/).</p>		BAL 20-201
<p>NOTE: Remind employees sending documents by email about methods to protect PII</p>				

Appendix

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 should be submitted per OPM BAL 20-102 *Guidance Regarding Temporary Changes to Retirement Application Processing While Operating Under Coronavirus Disease (COVID-19) Telework Policies*, dated May 26, 2020.

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 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 the notarized spousal consent within 30 days after the national/local social distancing policies are lifted.
FERS/CSRS Designation of Beneficiary (SF 3102 & SF 2808)	This form must be completed in front of two witnesses.	HR staff can witness the execution of this form.
SF 2823	This form must be completed in front of two witnesses.	HR staff can 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 attaining Death/Marriage/Birth Certificates and Divorce Decrees.
Death Certificates	Copies are acceptable.	
Marriage Certificates	Copies are acceptable.	