



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

***Benefits Administration Letter***

**Number:** 21- 203

**Date:** May 25, 2021

**Subject: Federal Employees' Group Life Insurance Program (FEGLI) -  
Forms Processing During Disruption of Agency Operations**

This Benefits Administration Letter (BAL) provides guidance to agencies on alternative methods to certify and process FEGLI forms during the current disruption to normal agency operations.

Alternative methods acceptable during the pandemic to certify certain FEGLI forms include the use of electronic signatures such as Personal Identity Verification (PIV) cards, Common Access Cards (CAC), and digital signature software (such as DocuSign). OPM will also temporarily allow the use of electronic and remote notary services to witness signatures on FEGLI forms. Electronic and remote notary services allows a signer to personally appear before a Notary at the time of the notarization using audio-visual technology over the internet instead of being physically present in the same room. For more information about the electronic and remote notary services during the COVID-19 emergency, please visit <https://www.nationalnotary.org/notary-bulletin/blog/2020/03/states-emergency-action-remote-notarization>.

**This guidance is effective through the end of the Presidentially declared COVID -19 emergency<sup>1</sup>.**

Agencies should develop a process to track FEGLI forms received by fax or email while this temporary process is in place. Agencies should also encourage employees to send the original forms in as soon as possible.

The chart below provides temporary guidance on the acceptance of electronic signatures for the most commonly used FEGLI forms:

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<sup>1</sup> [See the Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease \(COVID-19\) Outbreak](#)

Form	Guidance to Process Form	Agency Electronic Signature?	Enrollee Electronic Signature?
<b>SF 2817, Life Insurance Election</b>	<ul style="list-style-type: none"> <li>• Agency personnel may certify the SF 2817 electronically.</li> <li>• Agency personnel may accept electronic signatures from the insured to complete the SF 2817, if the agency is able to do so.</li> </ul>	<b>YES</b>	<b>YES</b>
<b>SF 2818, Continuation of Life Insurance Coverage as an Annuitant or Compensation</b>	Retiring employees must still provide an original “wet” signature and send the original by regular mail to their employing agency.	<b>N/A</b>	<b>NO</b>
<b>SF 2819, Notification of Conversion Privilege</b>	Agency personnel may certify the SF 2819 electronically to provide conversion privileges timely to the insured.  <b>Note: Separating employees must still use an original signature and mail the form to the Office of Federal Employees’ Group Life Insurance (OFEGLI) in order to obtain a conversion policy.</b>	<b>YES</b>	<b>NO</b>
<b>SF 2821, Agency Certification of Insurance Status</b>	Agency personnel may certify the SF 2821 electronically.  <b>Note: OPM has suspended the requirement that a certifying official cannot provide a facsimile signature, per BAL 20-201.</b>	<b>YES</b>	<b>N/A</b>

Form	Guidance to Process Form	Agency Electronic Signature?	Enrollee Electronic Signature?
SF 2822, Request For Insurance	<p>Agency personnel may certify the SF 2822 electronically.</p> <p><b>Note: Employees and the physician certifying their medical examination must still provide original signatures to complete the form. The form must still be mailed by the employee’s physician directly to OFEGLI.</b></p>	YES	NO
SF 2823, Designation of Beneficiary	<ul style="list-style-type: none"> <li>• Agency personnel may certify the SF 2823 electronically.</li> <li>• Agency personnel must continue to require completed forms that are in writing, with original signatures from the insured and two witnesses, per 5 CFR § 870.802(b).</li> <li>• Agency personnel may witness the execution of the SF 2823 as long as they are not named as the beneficiary. Agency personnel must provide an original “wet” signature, if signing as a witness.</li> </ul> <p>* The insured can have two individuals witness their signature through a virtual environment; however, the insured and witnesses’ signatures must be original.</p>	YES	NO*

Form	Guidance to Process Form	Agency Electronic Signature?	Enrollee Electronic Signature?
<b>RI 76-10, Assignment of Life Insurance</b>	<ul style="list-style-type: none"> <li>• Agency personnel may certify the RI 76-10 electronically.</li> <li>• All agencies must continue to require RI 76-10 that are in writing, with original signatures from the insured and two witnesses, per 5 CFR § 870.902(b).</li> </ul> <p>* The insured can have two individuals witness their signature through a virtual environment, however, the insured and witnesses' signatures must be original.</p>	<b>YES</b>	<b>NO*</b>
<b>FE-6, Claim for Death Benefits</b>	Claimants should continue to sign their claim form with an original signature and send with a certified death certificate by mail.	<b>N/A</b>	<b>N/A</b>
<b>FE-6 DEP, Statement of Claim, Option C</b>	Agency personnel may certify the FEP-6 DEP electronically.  <b>Note: Employees should continue to sign the form with an original signature and mail in a certified death certificate to their employing agency.</b>	<b>YES</b>	<b>NO</b>

**Agencies must submit all forms and death claim documentation with a cover sheet. Please see the template in Attachment A.**

## **Common questions concerning Revised Procedures for FEGLI forms during Presidentially Declared COVID-19 Emergency**

### **Can an employee use a Personal Identity Verification (PIV) or Common Access Card (CAC) to sign FEGLI forms?**

Employees that submit their FEGLI forms to their employing agency may only use their PIV/CAC cards to sign the SF 2817 electronically. The SF 2817 should contain your electronic signature, complete with the date it was signed. Submit this document to your employing agency for processing. For instructions on how to sign the SF 2817 using Adobe, please see **Attachment B**.

### **Will OPM waive the requirement to have two individuals witness an insured's signature for the SF 2823 due to social distancing guidelines?**

No. The SF 2823 must be signed by the insured and witnessed by two individuals as required by FEGLI law and regulation. The insured can have individuals witness their signature in a virtual environment, including but not limited to, Skype or Zoom, however, the signatures of the insured and their two witnesses must be original.

### **How can I have my signature for the SF 2823 witnessed in a virtual environment?**

The insured can have two individuals witness their signature at the same time using their choice of a virtual environment (such as Skype or Zoom). The insured will then mail or deliver the original signed form to the witnesses and, once completed, the last witness to sign the form can mail it back to the insured to submit to their employing agency.

### **Is the SF 2823 considered valid if received by fax or email?**

Per 5 CFR § 870.802(b), the employing agency can determine the appropriate method to accept the Designation of Beneficiary form. However, in all cases, the SF 2823 must include an original signature from the insured, contain original signatures from two witnesses, and must be received by the employing agency before the death of the insured.

Agencies are strongly encouraged to remind employees that they must provide a completed SF 2823 with original signatures as soon as possible.

### **How long does the insured have to submit the original SF 2823 to their employing agency?**

All FEGLI forms, including the SF 2823, must be submitted as soon as possible and received by the employing agency before the insured dies.

### **What happens if the insured faxes or emails their SF 2823, but dies before the original form is received?**

An original completed SF 2823 must be received before the death of the insured. If the form is not received before the insured dies, any previous valid benefit designation on file applies. If there are no designations on file, benefits will be paid according to the order of precedence in 5

CFR § 870.801(a).

**Should agencies upload forms received by fax or email into the eOPF?**

Agencies should develop a process to track FEGLI forms received by fax or email while this temporary process is in place. Agencies should include a note in the eOPF that a form was received by fax or email with the original to be submitted as soon as possible.

**Will the requirement for a certified death certificate be suspended?**

OPM continues to require a certified death certificate for claimants. However, for those who experience delays in obtaining a certified death certificate in their state, OFEGLI can accept an *Affidavit Regarding the Death of Insured* form (**Attachment C**) in order to expedite the claim while awaiting receipt of the certified death certificate. This requires claimants to have a mortuary service complete an *Affidavit Regarding the Death of Insured* form and return it directly to OFEGLI. The affidavit must be signed by the licensed funeral director/mortician.

Please note that all other supporting documentation, as appropriate, including court orders, assignments, powers of attorney, birth certificates, guardianship papers, and election forms verifying FEGLI coverage are still required. OFEGLI must be able to verify all of the documentation before a claim can be paid. The claimant must provide the certified death certificate to OFEGLI as soon as it is obtained. A failure to provide the certified death certificate may result in the recovery of all benefit payments made to all claimants.

**Is the agency process for death claim documentation changing?**

No, the agency is still required to send all original FEGLI documents to OFEGLI after the death of an employee. A cover sheet template must also be included.

If you have any questions regarding this BAL, please contact the FEGLI Program Office at [fegli@opm.gov](mailto:fegli@opm.gov) or call (202) 606-1413.

Sincerely,

Laurie Bodenheimer  
Associate Director  
Healthcare and Insurance