



UNITED STATES
CIVILIAN BOARD OF CONTRACT APPEALS

May 30, 2025

CBCA 8375-RELO

In the Matter of JONATHAN E.

Jonathan E., Claimant.

Dewey Bivens, Chief, Travel Payment Section and Permanent Change Station, Financial Management Directorate, Interior Business Center, Department of the Interior, Lakewood, CO, appearing for Department of the Interior.

KANG, Board Judge.

Claimant seeks review of the denial by the Department of the Interior (DOI or agency) of his request for reimbursement of travel costs in connection with a permanent change of station (PCS). We deny the claim.

Background

Claimant is a DOI employee who was hired in 2024 and assigned an entry date of December 15, 2024, at his new duty station in Grand Junction, Colorado. The agency issued a PCS request to its business office on December 2, 2024. Agency Response at 1. The agency states that this time frame “allowed only nine business days for processing, which is a significant reduction from the 45-day timeframe required” under agency guidelines. *Id.* On December 3, 2024, the agency provided claimant guidance about the PCS process and his eligibility for reimbursement of travel and other costs. *Id.*

Claimant states that he did not receive the guidance and information about the PCS process prior to his travel to his new duty station. He states that he was required to make travel arrangements for himself and his family on his own without such guidance because he would not have otherwise been able to meet his entry date.

Based on the record provided, it is unclear when the PCS authorization was granted. Nonetheless, the agency approved payment of certain of claimant's travel and relocation costs on February 19, 2025. The approval disallowed \$1484.80 for travel because it was paid using claimant's airline mileage points.

Claimant filed this claim with the Board seeking reimbursement of the denied travel amount. The Board docketed the claim on March 10, 2025. The docketing notice advised the parties that the agency's response to the claim was due by April 9, 2025, and that claimant could file comments on the agency's response no later than 30 days from receipt of the response. The agency filed its response on April 2, 2025. Claimant did not file comments on the agency's response.

Discussion

The sole matter raised by claimant is whether he is entitled to reimbursement of his travel based on his use of airline mileage points. Claimant contends that although he used airline mileage points, the ticket listed a dollar amount of \$1484.80 and this amount should be reimbursed to him.¹ Claimant also argues that he should be reimbursed this amount because he was not provided adequate or timely guidance for his PCS travel.

As a federal civilian employee, claimant is subject to the Federal Travel Regulation (FTR). *Aydin C.*, CBCA 7493-TRAV, 22-1 BCA ¶ 38,233, at 185,664. Although the FTR does not directly address the reimbursement of airline mileage points, decisions by this Board and its predecessor, the General Services Administration Board of Contract Appeals, have long held that employees may not be reimbursed for travel costs paid with airline mileage points or similar programs. *Richard Gong*, CBCA 5824-RELO, 18-1 BCA ¶ 36,997, at 180,170 ("Claimant also requests monetary compensation for using his airline miles/points to purchase his return flight. An employee's use of such non-monetary airline rewards to pay for travel is not compensable."); *Richard J. Maillet*, GSBCE 16446-RELO, 05-1 BCA ¶ 32,910, at 163,039 ("Employees, even new inexperienced ones, who secure transportation through the use of frequent flyer credits, coupons, or vouchers cannot be reimbursed for the value of the transportation."). The reimbursement of travel based on airline mileage points is not permitted due to: (1) the subjectivity that would be involved in ascertaining the value of airline mileage points; (2) the problems of control and accountability in allowing reimbursement for airline mileage points; and (3) the lack of guidance in statute and regulation on how to value such items. *Marc V. Dinger*, CBCA 2470-TRAV, 12-1 BCA ¶ 34,936, at 171,765.

¹ Claimant did not provide a copy of the actual ticket or other travel information.

Here, although claimant states that the ticket reflected a value of \$1484.80, claimant is not out of pocket for any specific dollar amount, and there is no method to ascertain whether the airline mileage points were in fact worth the value assigned by the airline. *See James A. Caughie*, CBCA 2508-RELO, 12-1 BCA ¶ 34,955, at 171,840 (“[T]he Government does not serve as a bank to pay employees a rate of exchange for redeeming mileage or other award points.”). Thus, for the reasons set forth in our longstanding precedent, claimant is not eligible for reimbursement.

Additionally, while it is regrettable that claimant was not provided timely guidance as to how to arrange his travel for his PCS, untimely, inadequate, or even erroneous advice by government employees regarding travel and relocation benefits does not entitle a claimant to reimbursement. *Scott A. Winterrowd*, CBCA 6680-RELO, 20-1 BCA ¶ 37,684, at 182,972-73; *Dean W. Yoder*, CBCA 5426-RELO, 17-1 BCA ¶ 36,893, at 179,789.

Decision

The claim is denied.

Jonathan L. Kang
JONATHAN L. KANG
Board Judge