



UNITED STATES
CIVILIAN BOARD OF CONTRACT APPEALS

January 13, 2025

CBCA 7942-TRAV

In the Matter of JEFFREY L.

Jeffrey L., Claimant.

Bonnie L. Petree, Lead Senior Accountant, Office of the Comptroller, Naval Air Warfare Center Aircraft Division, Department of the Navy, Patuxent River, MD, appearing for Department of the Navy.

SHERIDAN, Board Judge.

Claimant disputes the refusal of the Naval Air Warfare Center Aircraft Division Travel Office (Travel Office) to reimburse him for one day of lodging (\$139.24) when he was a “no show” and did not timely check into the hotel. Claimant has not identified a compelling basis for reserving lodging in advance of his arrival. The Travel Office was correct in refusing to reimburse claimant because he intentionally made the reservation knowing he would not be able to check in on-time.

Background

Claimant booked lodging for temporary duty (TDY) to begin on Saturday, October 7, 2023, knowing that his flight would not arrive until the morning of the next day, Sunday, October 8. Claimant made these lodging reservations outside of the Defense Travel System (DTS) for personal convenience because he believed doing so would ensure that space was available during the TDY period. When claimant failed to check into the hotel on October 7, the hotel identified him as a “no show.” The hotel charged claimant 207.75 in Australian dollars, which converted in United States currency to \$135 (without taxes). The Travel Office denied lodging reimbursement for the October 7 room charge in the amount of \$139.24. Claimant disagrees with this decision.

Discussion

Claimant is requesting \$139.24 in reimbursement for lodging expenses he incurred on October 7, 2023, while on TDY travel. We can find no cogent basis in the record demonstrating that claimant is entitled to any additional reimbursement above the amount that he has already received.

A foundational rule for federal employees who are required to travel for government business is that the employee is expected to exercise the same care in incurring expenses that a prudent person would exercise if traveling on personal business. The Federal Travel Regulation (FTR) provides:

§ 301-2.3 What standard of care must I use in incurring travel expenses?

You must exercise the same care in incurring expenses that a prudent person would exercise if traveling on personal business.

41 CFR 301-2.3 (2023) (FTR 301-2.3).

The Joint Travel Regulations (JTR), which also apply here, require: “A traveler is responsible for canceling a room reservation within the established time frame to avoid any no-show charges and must obtain a cancellation number to reverse a no-show charge.” JTR 020303.A.2 (Oct. 2023); *see also John J. Mele*, CBCA 6818-TRAV, 20-1 BCA ¶ 37,686, at 182,975.

The Board has held that the Government will reimburse a traveler for the cost of a forfeited hotel reservation only when the lodging was not used because of unforeseen circumstances and provided that the traveler exercised reasonable prudence. *Geepy Pe*, CBCA 5031-TRAV, 16-1 BCA ¶ 36,331, at 177,121.

Here, claimant did not exercise reasonable prudence. Claimant was well aware that he had booked a day of lodging that he would not be able to use. He purposefully did so outside the DTS system. His actions were not that of a prudent traveler, and the Travel Office correctly denied reimbursement.

Decision

For the reasons stated above, the claim is denied.

Patricia J. Sheridan
PATRICIA J. SHERIDAN
Board Judge