UNITED STATES
CIVILIAN BOARD OF CONTRACT APPEALS

September 8, 2026

CBCA 8882-RELO

In the Matter of VANESSA F.

Vanessa F., Claimant.

Lisa A. Iselo, Director, Travel Pay and Oversight, Total Force Pay, Defense Finance and Accounting Service, Indianapolis, IN, appearing for Department of Defense.

KANG, Board Judge.

Defense Finance and Accounting Service (DFAS) submitted on behalf of claimant, a civilian employee of an agency within the Department of Defense (agency), a claim for reimbursement of relocation expenses in connection with a permanent change of station (PCS). We grant the claim.

Background

In May 2025, the agency issued claimant PCS orders that relocated her position from Alexandria, Virginia, to Peachtree City, Georgia, with a reporting date in June 2025. At the time the PCS orders were issued, claimant was a full-time remote worker, and her permanent duty station (PDS) was her residence in Fortson, Georgia (old PDS or old residence). The PCS orders specified that her new PDS would be in Peachtree City, Georgia (new PDS).

As part of her PCS orders, claimant was authorized to receive relocation benefits including real estate transaction expenses, a miscellaneous expense allowance (MEA), a temporary quarters subsistence allowance, and the shipment of household goods (HHG). Shortly before receiving her PCS orders, claimant entered into a contract for the purchase of a house in Fortson, Georgia (new residence). The closing on the new residence was completed in June 2025, after her reporting date to the new PDS.

In late June 2025, claimant submitted a travel settlement voucher, seeking $1810 for MEA, $9984.63 for real estate transaction expenses, and $202.44 for HHG expenses.[1] In July 2025, the agency denied the request for expenses because the change in claimant's commute did not result in a "substantial reduction in commuting distance or time" and was therefore found not to have been the result of the PCS. The agency's determination cited electronic map data which showed that claimant's commute between the old residence and the new PDS was 74.8 miles with a travel time of one hour and sixteen minutes, and the commute between the new residence and the new PDS was 68.1 miles with a travel time of one hour and nine minutes. *Id.*

In August 2025, claimant submitted to the agency a request for reconsideration of the denial of her request for reimbursement of expenses. In December 2025, the agency affirmed the denial of claimant's request for expenses. Final Decision at 4. In the denial, the agency relied upon the same commuting distances and times cited in the agency's initial denial of the request and affirmed that, because the residence relocation did not result in a "substantial reduction in commuting distance or time," it was therefore not required by the PCS. *Id.* at 3. Aside from this determination, the agency did not cite any other reasons for denying the request for reimbursement.

Claimant requested that DFAS review the agency's decision and assist her with filing a claim with the Board. In March 2026, DFAS advised that it concurred with the agency's denial request for expenses. DFAS Letter (Mar. 6, 2026) at 1, 2. DFAS cited the same commuting distances and times identified in the agency's denial and concluded that her commute "remained largely unchanged." *Id.* at 1. DFAS acknowledged that claimant cited alternative calculations for her commute of 67.1 miles and a travel time of one hour and one minute, but concluded that her claimed travel distance and time "does not present a significant discrepancy from the agency's determination." *Id.* at 2. DFAS concluded that the change in distance and travel time for her commute showed that the change in residence "was a matter of personal preference rather than a requirement incident to her new PDS in Peachtree City." *Id.* DFAS then forwarded the claim to the Board.

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[1] The claim forwarded to the Board by DFAS identified MEA, real estate transaction expenses, and HHG expenses. Claimant's March 30, 2026, letter to DFAS also states that she seeks "upwards of $9,000 in HHG relocation expenses." It is not clear whether the additional HHG expenses were submitted by claimant to the agency. These additional HHG expenses were not included in the claim forwarded to the Board and are therefore not addressed in this decision.

Discussion

I. PCS Expense Eligibility Requirements

When an agency transfers an employee from one PDS to another within the United States and the transfer is in the agency's interest, the agency must pay some of the employee's real estate purchase transaction expenses. 5 U.S.C. § 5724a(d)(1) (2024). Additionally, where an employee is transferred from one PDS to another in the agency's interest, and where the agency head or their designee authorizes or approves, an agency must pay travel expenses and costs related to the transfer of household goods. *Id.* § 5724(a).

Relocation and travel expenses for Department of Defense civilian employees are governed by the Federal Travel Regulation (FTR), as supplemented by the Joint Travel Regulations (JTR). *See Bryan L.*, CBCA 8470-RELO, 25-1 BCA ¶ 38,920, at 189,428. The following JTR provision applies to a DOD civilian employee's request for reimbursement of expenses authorized by PCS orders:

> Short-Distance Transfers
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> PCS claims for allowances authorized in an order must satisfy the requirements in this paragraph before reimbursement is allowed. . . .
>
> A. 50-Mile Distance Test. When a PCS is in the Government's interest, an [authorizing official (AO)] may authorize or approve PCS travel and transportation allowances to a new PDS that meets the 50-mile distance test and results in a residence relocation. Ordinarily, a residence relocation is not for a PCS unless the civilian employee's proposed new residence is closer to the new PDS than the residence from which he or she commuted daily to the old PDS. If the civilian employee changes the proposed new residence location, the AO must review the change for compliance with these criteria. Non-compliance of the new residence location is grounds for denial of the various allowances.
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> 1. The 50-mile distance test is met when the distance to new PDS from the civilian employee's current residence is at least 50 miles further than the distance between the old PDS and that same residence. The distance is the shortest of the commonly traveled routes between the PDS and the residence.

> 2. The AO must consider commuting time and distance between the residence at the time of PCS notification and the old PDS and new PDS and the time and distance between the proposed new residence and the new PDS to determine that the residence relocation is for a PCS.

JTR 054802.

As set forth above, the JTR requires an agency to determine whether a residence relocation was "for a PCS." This is a separate determination from whether the change of PDS was in the Government's interest. In determining whether a residence relocation was "for a PCS," the agency must consider: (1) the fifty-mile test, as measured by the change in PDS, and (2) the change in the commuting time and distance to the new PDS that resulted from the change in residence. JTR 054802(A). This analysis is presumably to ensure that relocation expenses are not paid to, for example, an employee whose change in PDS satisfies the fifty mile test, but whose change in residence results in a nominal reduction in commuting time and distance.

II. <u>Claimant's Change in Residence Was Related to the PCS</u>

Claimant argues that the agency improperly found that her relocation was not for a PCS and was instead for her personal preference or convenience. Claimant primarily contends that the agency's analysis of the duration of her new commute was inaccurate. Claimant further explains that her children's educational and medical needs required staying within the same school district that served her old residence. Claimant's Response at 2. She states that her "relocation was therefore guided by the need to balance multiple obligations: compliance with a management-directed reassignment, preservation of my children's medically necessary care and stability, and practical considerations related to my duty location." *Id.*

The agency did not specifically address the fifty-mile test in denying claimant's request for expenses. Claimant's old PDS was her old residence in Fortson, Georgia, meaning that the distance between her residence and her PDS at the time of the PCS was, in effect, zero miles. The parties agree that the distance between her old residence and new PDS was approximately seventy-five miles, which more than satisfies the fifty-mile test. JTR 054802(A)(1); *see Christy P.*, CBCA 7406-RELO, 22-1 BCA ¶ 38,167, at 185,368.

The agency's denial of the request for reimbursement focused on the second part of the analysis required under JTR 054802, wherein the agency "must consider commuting time and distance . . . to determine that the residence relocation is for a PCS." JTR 054802(A)(2).

The agency calculated the commute from the old residence to the new PDS to be 74.8 miles with a commuting time of one hour and sixteen minutes. Agency Final Decision at 3. The agency calculated the commute from the new residence to the new PDS to be 68.1 miles with a commuting time of one hour and nine minutes. *Id.* These calculations yielded a round-trip savings of 13.4 miles and fourteen minutes per day. The agency determined that the change in residence did not result in a substantial reduction in commuting distance and time which demonstrated that the move was the result of the PCS. Instead, the agency concluded that the change in residence was for claimant's personal preference or convenience.

Claimant argues that the agency's assessment of the travel time for her new commute did not accurately reflect traffic. She contends that the travel time from her new residence to the new PDS is one hour and one minute, rather than one hour and nine minutes as calculated by the agency. Claimant's Letter (Mar. 30, 2026) at 1; Claimant's Letter (Jan. 23, 2026) at 2. Claimant provided a screenshot of electronic map data that appears to show directions from her new residence to the new PDS with a one hour and one minute time. The 7:52 a.m. arrival time on the map implies a departure time of 6:51 a.m.

Claimant also does not provide calculations of the commuting time between her old residence and new PDS, or specifically compare the old commute to the new commute times. Instead, she generally represents that the new commute is shorter by sixteen to twenty minutes each way. It is not clear how claimant calculates a savings of sixteen to twenty minutes each way, given her representation that her commute is one hour and one minute and her lack of data regarding the old commute or a specific challenge to the agency's finding that the old commute was one hour and sixteen minutes.

In reviewing this claim, we consulted Google Maps,[2] https://www.google.com/maps (last visited Sept. 8, 2026), to assess the time and distance between the old residence and new PDS and the new residence and new PDS. Neither the agency nor claimant distinguished between morning and afternoon commute times. The agency also did not use a specific time when calculating the commute distances and time.

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[2] Claimant and the agency both used electronic map services to calculate the distances and commuting times. The JTR authorizes use of electronic map services for calculating distances in connection with short-distance transfers; the JTR does not address using electronic map services for calculating travel time. JTR 020204(b)(4). As both parties used electronic map services for both distance and travel time without objection, we see no reason why they cannot be used to calculate both travel times and distances.

Data from Google Maps based on a 7:00 a.m. departure and 5:00 p.m. return (consistent with the time indicated in claimant's electronic map service screenshot) shows commuting distances between the new residence and new PDS and between the old residence and new PDS that generally accord with claimant's and the agency's electronic map data, yielding a shorter commute by approximately seven miles each way.[3] The commuting time between the new residence and new PDS generally accords with claimant's electronic map data, supporting a commute of approximately one hour and one minute. The commuting time between the old residence and new PDS generally accords with the agency's electronic map data–which was not challenged by claimant–supporting a commute of approximately one hour and sixteen minutes.

In sum, claimant's change of residence reduced the commute by approximately seven miles each way, for a daily round-trip savings of fourteen miles—a reduction of approximately nine percent. The new commute, as reflected by claimant's and the agency's electronic map data, and data we reviewed, shows a commuting time of approximately two hours and two minutes, with a time savings of thirty minutes per day—a reduction of approximately twenty percent.

The JTR does not define how commuting time and distance are to be considered or set any specific standards for when a change in residence meets the requirement to be for the purpose of the PCS. While not expressly cited in the JTR, the agency's determination considered whether the change in residence resulted in a "substantial savings of time and distance" with regard to the commute to the new PDS. We find use of this criterion to be a reasonable exercise of the agency's discretion in making the required assessment under JTR 054802(A)(2). *See Kenneth T. Donahoe*, CBCA 3619-RELO, 14-1 BCA ¶ 35,746, at 174,936 (citing *William T. Orders*, GSBCA 16095-RELO, 03-2 BCA ¶ 32,389, at 160,290); *see also William F. Brooks, Jr.*, CBCA 2595-RELO, 12-2 BCA ¶ 35,064, at 172,238 ("[W]hen regulations vest discretion in an agency with respect to the authorization of particular relocation expenses, the agency's judgment will not be disturbed unless the determination is arbitrary, capricious, or clearly erroneous.").

Although use of the "substantial savings of time and distance" standard is reasonable, the agency does not cite any specific guidance or criteria in connection with that standard. We therefore look to the common understanding of the term "substantial." The term substantial is generally defined to mean: "considerable in quantity: significantly great,"

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[3] We recognize that reviewing the data in 2026 could produce different results than the parties found in 2025. However, our results appear consistent with the electronic map screenshots provided by the parties.

https://www.merriam-webster.com/dictionary/substantial (last visited Sept. 8, 2026); or "1. Of, relating to, or involving substance; material <substantial change in circumstances>. . . . 3. Important, essential, and material; of real worth and importance <a substantial right>. . . . 6. Considerable in extent, amount, or value; large in volume or number <substantial support and care>." Black's Law Dictionary (12th ed. 2024).

As noted, the JTR requires consideration of both commuting distance and time. The change in claimant's residence resulted in a daily commute that was shorter in terms of distance by approximately fourteen miles (nine percent) and in terms of time by approximately thirty minutes (twenty percent). Over the course of a week, these savings amount to approximately seventy miles and two-and-a-half hours. We conclude that the change in claimant's commute was substantial—that is, considerable in quantity and of real worth and importance. Because claimant's change in residence resulted in a substantial savings of commuting time and distance, her change in residence was for the purpose of the PCS. Claimant is therefore entitled to the expenses sought in her claim.

<u>Decision</u>

The claim is granted. The agency shall pay claimant $11,997.07 for the MEA, real estate transaction expenses, and HHG expenses.

Jonathan L. Kang
JONATHAN L. KANG
Board Judge