



UNITED STATES
CIVILIAN BOARD OF CONTRACT APPEALS

March 2, 2026

CBCA 8792-TRAV

In the Matter of TERRI D.

Terri D., Claimant.

Jillian Curtis, Chief Financial Officer, Office of Finance and Accounting, Indian Health Service, Department of Health and Human Services, Rockville, MD, appearing for Department of Health and Human Services.

LESTER, Board Judge.

At the start of a recent temporary duty (TDY) trip, claimant drove from her residence to her local airport prior to flying to the TDY site and incurred \$40 in parking fees during her four-day trip. Claimant's agency is willing to reimburse her for only \$16.74 of that amount, asserting that, based upon its review of a taxi fare estimating website, she would likely have spent only that amount if she had used a taxi or a transportation network company (TNC) to get to and from the airport. Claimant challenges the agency's reduction.

Because the record does not support the agency's use of its estimated cost but instead shows that the \$40 in costs incurred is reasonable and in accordance with regulation, we grant the claim.

Background

Claimant regularly travels within the continental United States (CONUS) on TDY as part of her position with the Indian Health Service within the Department of Health and Human Services (HHS). On November 17, 2025, when beginning another TDY trip, claimant drove her personally-owned vehicle (POV) from her residence to the nearest

commercial airport and parked it in the long-term economy airport parking lot. When she returned from TDY travel four days later, she was charged a total parking fee of \$40 (\$9 per day).

On December 6, 2025, HHS's Office of Finance and Accounting (OFA) notified claimant that her travel voucher for the trip was being approved, with the exception that her \$40 parking claim was being reduced to \$16.74. OFA reported that it made the adjustment because the parking fees exceeded the estimated cost of a round-trip taxi or TNC ride between the traveler's residence and the airport.

The traveler challenged that reduction by email to HHS dated December 13, 2025. As her challenge was being processed, she provided the agency with receipts for actual costs that she incurred using Uber for Government during two TDY trips taken after HHS had reduced her November 2025 parking reimbursement. The receipts for the first trip showed a total round-trip cost from her residence to the airport (not including tips) of \$68.80: \$27.58 for the trip from her residence to the airport on December 8, 2025, and \$41.22 for the return trip on December 12. The receipts for the second trip showed a total round-trip cost (not including tips) of \$75.22: \$28.26 for the trip to the airport on December 15, and \$46.96 for the return trip on December 19, 2025. Had claimant driven her POV to and parked at the airport during either of these TDY trips (generating parking fees of \$40 per trip), it would have saved HHS money.

By decision dated January 15, 2026, a senior travel officer for HHS denied claimant's appeal, standing by the agency's original taxi fare estimate. In her decision, the HHS officer represented that the agency's search of a taxi fare estimating website, taxifarefinder.com, indicated that "the average cost of a round-trip taxi or rideshare service from your residence to the airport, plus 15 percent tip," is \$16.74. Specifically, on the date on which HHS searched the taxi fare estimating website, the site identified a range of potential one-way taxi fares between the residence and the airport from \$6.85 with no traffic, \$7.28 with light traffic, and \$11.52 with heavy traffic. To calculate its \$16.74 round-trip cost, HHS took the light-traffic estimate of \$7.28, added a 15% tip, and then doubled the total. HHS found higher estimated pre-tip fares for Uber and Lyft (one-way pre-tip fares of \$11.61 and \$14.99, respectively) but elected to rely on the light-traffic estimated fare from the estimating website as its ceiling for parking reimbursement.

Claimant submitted her claim to the Board on January 20, 2026, explaining that this issue is important to her because she travels one to two times a month and that, each time, she "will incur TNC that is greater than the cost of parking [her] POV at [her] local airport."

Discussion

“Under the [Federal Travel Regulation (FTR)], a traveler authorized TDY travel can incur reimbursable expenses to get from his or her residence or [permanent duty station (PDS)] to an airport from which the traveler will fly to his or her authorized destination and to travel back to his or her residence or official station after the return flight.” *Rafael S.*, CBCA 7243-TRAV, 22-1 BCA ¶ 38,071, at 184,859; *see* FTR 301-10.420 (41 CFR 301-10.420 (2024)). The version of FTR 301-10.308 in effect when claimant traveled provided that, if the traveler elected to drive a POV from her residence to the departure airport, the reimbursable portion of parking fees incurred to park the traveler’s vehicle at the departure airport could not exceed the round-trip cost between the traveler’s residence or PDS and the airport by a taxi, a transportation network company (TNC), or an innovative mobility technology company:

§ 301-10.308 What will I be reimbursed if I park my POV at a common carrier terminal while I am away from my official station?

Your agency may reimburse your parking fee as an allowable transportation expense not to exceed the cost of one of the following to/from the terminal as determined by your agency:

- (a) The cost of a taxi.
- (b) The cost of a TNC fare.
- (c) The cost of using an innovative mobility technology company.

FTR 301-10.308 (now superseded).¹ Included in the reimbursable cost of the taxi or TNC is a reasonable tip, *id.* 301-420(a), which HHS calculates as 15% of the total fare.² “[T]o the

¹ Although 41 CFR 301-10.308 was superseded effective December 8, 2025, the section that replaced it, which is located at 41 CFR 301-10.304, is substantially the same in substance and content to section 301-10.308. The new regulation is simply no longer written in a question-and-answer format. *See* 90 Fed. Reg. 56890, 56910 (Dec. 8, 2025). Because the FTR in effect at the time of the claimant’s travel governs her reimbursement entitlements, *see David K. Leonard*, GSBCA 14334-TRAV, 98-2 BCA ¶ 29,882, at 147,938, we cite superseded section 301-10.308 in this decision.

² Although the Joint Travel Regulations (JTR), which are applicable to defense agencies, define the allowable tip amount as 20% of the cost of the taxi or TNC ride, JTR 020213-A.1 (Nov. 2025), claimant has not identified any regulation or policy, nor have we found one, that would require a non-defense agency like HHS to apply that tip percentage.

extent that parking fees at the departure airport exceed what the round-trip costs of a taxi or [TNC or innovative mobility technology company] to and from the departure airport would have been [inclusive of the allowable tip], the employee, not the Government, is responsible for the excess costs.” *Rafael S.*, 22-1 BCA at 184,860. “There is no basis for us to authorize the reimbursement of fees beyond that permitted by the regulation.” *Paul F. Anderson*, CBCA 3639-TRAV, 14-1 BCA ¶ 35,732, at 174,901.

The only dispute before us is about the reasonableness of the agency’s estimate of the round-trip taxi or TNC cost between the airport and the traveler’s residence. In its decision denying the claim at issue, the agency determined that “the average cost of a round-trip taxi or rideshare service from [claimant’s] address to the airport, plus 15 percent tip,” was \$16.74, a figure that is less than half of claimant’s \$40 airport parking charge. Agency Decision (Jan. 15, 2026) at 2. To calculate its fare estimate, the agency relied solely on a fare-estimating website. The agency claims that “[u]sing the average estimate provided by [the website] allows the Agency to treat airport parking reimbursements consistently, in light of the complex, dynamic variables used to calculate taxi/TNC fares at any given point in time.” *Id.*; see Agency Response (Feb. 24, 2026) at 2.

As an initial matter, we have been unable to regenerate the \$16.74 round-trip fare estimate that HHS obtained. Instead, when we visited the website that the agency identified and typed in claimant’s address, our searches generated estimated light-traffic round-trip costs (inclusive of a 15% tip) of \$27.26 and heavy-traffic costs (inclusive of a tip) of up to \$38.28, while Uber and Lyft were offering one-way fares (without tips) of \$18 and \$21, respectively. The record does not identify what information the taxi fare estimating website relied upon to calculate the estimates that the agency obtained, which seem inconsistent with the results that we saw.

Nevertheless, it is undoubtedly reasonable for an agency to turn to the type of fare-estimating website that it did when starting its process of identifying the reasonable estimated cost of a round-trip between a residence and an airport. See, e.g., *Rafael S.*, 22-1 BCA at 184,860 (relying on fare data from taxi fare estimating website); *Radhika Patole*, CBCA 770-TRAV, 07-2 BCA ¶ 33,648, at 166,623 (same). Yet, such a website is generally only a starting point, particularly if the traveler challenges the reliability of the fare estimate. The taxi fare estimating website does not claim to be perfect. To the contrary, notices on the site indicate that an “actual fare may vary depending on unforeseen factors, such as inclement weather, unusual traffic congestion, and even your driver’s driving habits.” <https://www.taxifarefinder.com/faq.php> (last visited Mar. 2, 2026). Although the “taxi fare calculation [that the website provides] is based on a proprietary algorithm that takes into account multitude of considerations,” *id.*, the website owner “does not guarantee the accuracy of the information provided,” disclaims all warranties, and “denies any and all liability for

a user's reliance on the information provided which is provided free of charge and for planning purposes only." <https://www.taxifarefinder.com/disclaimer.php> (last visited Mar. 2, 2026).

Although "[i]t is ultimately the claimant's burden to establish his [or her] right to payment, . . . as well as the correct amount to be paid," *Rafael S.*, 22-1 BCA at 184,860 (citing *Christopher R. Chin-Young*, CBCA 3734-RELO, 14-1 BCA ¶ 35,688, and *Benjamin A. Knott*, CBCA 4579-RELO, 15-1 BCA ¶ 36,019), we have previously found that a traveler's presentation of alternative cost calculations from the agency's chosen website, made at different times of day in markets with dynamic transport pricing, is a reasonable way to challenge an agency's more limited cost calculation as unreliable. *See id.* The traveler can also attempt to show extenuating circumstances that might have made regular taxi or TNC service effectively unavailable at the time of travel, making the cost comparisons mostly meaningless. *See Lee C. Moores*, CBCA 6004-TRAV, 18-1 BCA ¶ 36,990, at 180,154-55. Here, claimant presented even stronger evidence than that: she provided actual receipts for four Uber rides that she took between the airport and her residence using Uber for Government in December 2025, after her November 2025 parking reimbursement was reduced, with pre-tip costs of \$27.58, \$41.22, \$28.26, and \$46.96. Although the agency has a right to try to contest that evidence, perhaps by showing that unusual circumstances such as weather or road construction delays affected the costs of those Uber rides in a manner that would not have affected her November 2025 travel, the agency here has provided no such evidence.

The evidence of actual recent costs for the route that claimant must travel to and from the airport is far more credible than a calculation from a taxi fare estimating website, *see Paul F. Anderson*, 14-1 BCA at 174,901 (finding claimant's fare estimate more credible where it "was derived by calling the taxi company, as compared with an estimate used by the [agency] from an internet site"), and is much more consistent with our own review of the website to which the agency cited as well as related Uber and Lyft sites. We reject as unfounded the agency's suggestion that, because its fare estimate from the website was obtained a few days before claimant incurred actual TNC costs during travel (December 5 as opposed to December 8, 12, 15, and 19) and is closer in time to when claimant incurred the parking costs at issue here, its estimate is somehow more reliable. *See Agency's Response* at 2. The agency has identified no viable reason for finding a traveler's actual costs on other close-in-time TDY trips a less reliable cost estimating tool than the results of a search of a fare estimating website that creates calculations based on unknown and unknowable information inputs and parameters.

The agency also argues that "[c]onsidering the complex, dynamic variables influencing taxi/TNC fares at any given point in time, using the average estimate provided

by taxifarefinder.com (\$16.74) allows the agency to address airport parking reimbursement claims in a prudent, reasonable, and consistent manner.” Agency Response at 2. Although the desire for administrative ease in dealing with travel claims is understandable, the agency’s ultimate goal has to be to compensate its employees fairly and as fully as possible for engaging in travel that furthers the Government’s interests and mission. *See Lee C. Moores*, 18-1 BCA at 180,155. Even HHS recognizes that “[t]axi/TNC fares vary widely” and that the agency’s own recent search of Uber and Lyft sites shows higher transport fares than what it estimated for claimant. Agency’s Response at 2. In such circumstances, the agency cannot ignore real-world data in favor of the administrative ease of using a light-traffic taxi fare website estimate.

Decision

For the foregoing reasons, the claim is granted. Claimant is entitled to reimbursement of the full \$40 that she paid for airport parking during her November 2025 travel, less the \$16.74 that the agency previously reimbursed.

Harold D. Lester, Jr.

HAROLD D. LESTER, JR.

Board Judge