UNITED STATES
CIVILIAN BOARD OF CONTRACT APPEALS

August 20, 2026

CBCA 8831-TRAV

In the Matter of BRITTAINY C.

Brittainy C., 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.

O'ROURKE, Board Judge.

Claimant, a federal employee, seeks review of the decision by the Department of Health and Human Services (HHS) to reimburse $19.30 instead of the $54 she incurred for airport parking while traveling on official business. The agency determined that reimbursement of airport parking expenses was limited to the round-trip constructive cost of using a taxi or transportation network company (TNC), such as Lyft or Uber. Because we find that claimant's evidence of point-in-time fares is more credible than HHS's estimated average fares from a proprietary website, we grant, in part, claimant's request.

Background

In June 2025, claimant traveled from her permanent duty station in South Dakota to Connecticut for official business. She drove her personal vehicle to the airport, parked there during the trip, and incurred a $54 parking charge. She listed the expense on her travel voucher and submitted it for reimbursement.

HHS reimbursed $19.30 of the $54 charge. In doing so, HHS relied on a provision of the Federal Travel Regulation (FTR) limiting airport parking reimbursement to the cost of round-trip taxi or TNC service between the traveler's residence and the airport. *See* 41 CFR 301-10.308 (2024) (FTR 301-10.308). Because claimant did not initially provide taxi/TNC fare information, HHS used the estimating tool at TaxiFareFinder.com

(TaxiFareFinder) to calculate an average TNC fare of $8.39 each way, plus a fifteen-percent tip of $1.26, for a total allowable reimbursement of $19.30. The initial denial letter from the agency, dated July 3, 2025, invited claimant to appeal the adjustment to the agency if she disagreed with the reduction, which she did.

Claimant challenged the agency's decision to reduce the parking fee, maintaining that TNCs in her area were both scarce and unreliable. She further explained that parking was not only the most dependable option to meet mission needs but was also the safest option. In support of her contention that taxis and TNCs were not necessarily more cost-effective at the times of day that she actually traveled (referred to in the record as "point-in-time fares"), claimant provided the agency with screen shots of the same. These included round-trip costs, plus tip, totaling: $50.28 for Lyft; $64.26 for Uber; and $103.50 for Rapid Shuttle.

In January 2026, HHS denied claimant's agency-level appeal and maintained that its $19.30 calculation complied with the FTR and the agency's standard practice of using TaxiFareFinder to estimate *average* taxi/TNC fares. HHS acknowledged that claimant's point-in-time fare estimates were higher but prioritized the online average as a consistent method for determining airport parking reimbursement despite the dynamic variables affecting taxi and TNC pricing. In her appeal to the Board, claimant challenged the agency's reliance on a proprietary algorithm to generate average fare estimates when actual point-in-time fare information was available. She also asserted that she was not given the opportunity to provide this information before her travel voucher was closed out. In response, the agency confirmed that the voucher was partially denied due to lack of supporting documentation, but the record shows that the agency ultimately reviewed those fare quotes during the agency's second review of the evidence.

The agency's response also included a memorandum from the HHS Deputy Director for Intergovernmental Affairs, authorizing claimant to incur additional airport parking expenses while on temporary duty (TDY) in Connecticut because of concerns for her personal safety. Specifically, the memorandum permitted claimant to park in the parking lot closest to the airport terminal to minimize walking distance from her vehicle to the terminal as long as the parking cost did not exceed the round-trip cost of travel by taxi or TNC. Finally, the Deputy Director echoed claimant's statement that local TNCs are routinely unavailable in the area, undermining the agency's ability to meet mission-critical needs.

Discussion

The FTR governs reimbursement of allowable travel expenses. *See* FTR 301-10. When traveling on official business, an employee may elect to drive from their residence and park their privately-owned vehicle (POV) at their authorized point of departure or return. In such cases, the agency may reimburse travelers for parking fees associated with leaving their vehicle at a common carrier terminal while on official travel. However, this reimbursement is not without conditions:

> **§ 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.

Employees bear the burden of proving both entitlement to payment as well as the correct amount of that payment. *Rafael S.*, CBCA 7243-TRAV, 22-1 BCA ¶ 38,071, at 184,860 (citing *Benjamin A. Knott*, CBCA 4579-RELO, 15-1 BCA ¶ 36,019; *Christopher R. Chin-Young*, CBCA 3734-RELO, 14-1 BCA ¶ 35,688). The agency reimbursed claimant $19.30 based on an estimated round-trip fare calculated using a website estimator rather than evidence of actual costs directly from a taxi company or TNC. The agency maintains: (1) that this amount represents the appropriate transportation cost; and (2) that its use of the website provides the agency with a prudent, reasonable, and consistent method for evaluating airport parking claims across the agency. Claimant contends that the agency's estimate does not accurately reflect the cost of transportation that would have been available to her based on point-in-time fare estimates received *directly* from Lyft and Uber.

We recognize that the use of TaxiFareFinder or other web-based estimating tools may be acceptable under certain circumstances, such as in the absence of any other evidence. We remind agencies, however, that such an estimate is a *starting point* and that alternative cost calculations may reasonably be used to challenge an agency's estimate when transportation prices vary dynamically. *Terri D.*, CBCA 8792-TRAV, 26-1 BCA ¶ 39,008, at 189,968-69. For example, an employee's fare estimate may be more accurate or persuasive when it was obtained *directly* from the taxi provider, "as compared with an estimate . . . from an internet site." *Paul F. Anderson*, CBCA 3639-TRAV, et al., 14-1 BCA ¶ 35,732, at 174,901.

The circumstances here favor claimant's point-in-time fare estimates for the same reason—they were obtained directly from local transportation companies rather than from a website estimating tool. Even TaxiFareFinder cautions that its estimates may differ from the actual fare.[1] While claimant did not submit fare estimates with her original travel voucher, she subsequently provided them to the agency in support of her request that the agency reconsider the reduced reimbursement. Furthermore, claimant's fares replicate the times of day that she actually traveled, as opposed to the agency's average fare estimates.

Given the fact that fares fluctuate widely depending on many variables, using an average fare is improper in these circumstances. The record contains evidence of *actual* fare costs from Lyft, Uber, and Rapid Shuttle from claimant's residence to and from the airport. We find the probative value of actual fares to be superior to average fare estimates from a website. Actual fares better replicate what claimant would have paid had she utilized one of those services for her TDY. Thus, in the face of more reliable evidence, we decline to rely on average estimates from a website that disclaims any warranty of the same. Finally, travel reimbursement is not a "one-size-fits-all" process. It is paid to individual employees consistent with regulations and the facts of each TDY, not for the sake of administrative ease or achieving consistency across the agency.

We conclude that the $50.28 Lyft fare is the most reasonable measure of the allowable transportation cost in this case. It is the lowest of claimant's point-in-time estimates and, unlike the agency's average cost estimate, provides evidence most relevant to her official travel, does not exceed the cost of a TNC fare, and, thus, complies with governing regulations. *See* FTR 301-10.308. While claimant's actual parking expense exceeded the round-trip costs of the TNC fares, the employee, not the Government, is responsible for the excess costs. *Rafael S.*, 22-1 BCA at 184,860.

Decision

We grant, in part, claimant's request for reimbursement of airport parking. The agency shall pay to claimant $30.98 ($50.28 less the $19.30 that the agency previously paid to her).

Kathleen J. O'Rourke
KATHLEEN J. O'ROURKE
Board Judge

---

[1] This website expressly states: "TaxiFareFinder does not guarantee the accuracy of the information provided. All warranties are hereby disclaimed and TaxiFareFinder denies any and all liability for a user's reliance on the information . . . which is provided free of charge and for planning purposes only." https://www.taxifarefinder.com/disclaimer.php (last visited August 18, 2026).