



UNITED STATES  
CIVILIAN BOARD OF CONTRACT APPEALS

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January 6, 2026

CBCA 8586-RELO

In the Matter of JEREMY S.

Jeremy S., Claimant.

Maili L. Peters, Director, Civilian Talent Readiness, Air Force Personnel Center, Department of the Air Force, Randolph Air Force Base, TX, appearing for Department of the Air Force.

**SHERIDAN**, Board Judge.

Claimant challenges the amount that the Department of the Air Force (AF) approved as the maximum payable home value for his home under the Department of Defense (DoD) National Relocation Program (DNRP) Guaranteed Home Sale (GHS). The AF approved the amount of \$1,081,700 as the maximum reimbursable amount, which is controlling under the Joint Travel Regulation (JTR). Because the AF reasonably exercised its discretion in setting this limit, we deny the claim.

Background

Claimant, a civilian employee of the AF, was selected for a position in Utah. He reported to the new position in June 2025. Claimant sought entitlement under the DNRP for the sale of his Arizona residence in connection with the transfer. Claimant requested a waiver from the AF to raise the DNRP maximum payable home value to \$1,850,000, as it exceeded the standard DNRP maximum threshold of \$750,000. On August 25, 2025, the AF approved a waiver raising the payable home value to \$1,081,700.

The residence was listed by claimant for sale at \$1,850,000 in June 2025. To the Board's knowledge, the property has not yet sold. The original purchase price of claimant's

residence in 2020 was \$750,500. The Maricopa County tax assessor valued claimant's property at approximately \$1,081,700 in 2025. To establish the value of his property, claimant proffered selected listings of what he viewed as comparable home listings (ranging from approximately \$1,650,000 to \$1,825,000) and a list of his home's remodeled/upgraded features.

### Discussion

"The DNRP is not mandatory, but may be used at the sole discretion of the transferring employee, once it is approved by their command."<sup>1</sup> The GHS is part of the DNRP and provides an alternative to the standard real estate expense reimbursement to someone being transferred by the DoD. The maximum home value payable for the GHS portion of DNRP is limited to \$750,000 under the JTR:

C. Relocation Services Responsibility for a Civilian Employee. The Government will pay a relocation services company actual expenses incurred in connection with the purchase of a civilian employee's home, limited to a maximum home value of \$750,000. The civilian employee is responsible for all additional costs for a home value above \$750,000. The funding activity may waive the maximum according to DoD Component regulations.

JTR 054601-C (June 2025).

The regulation does not mandate any particular way of calculating the maximum authorized amount for reimbursement. Regardless of the method used to value an employee's property, the JTR clearly leaves the waiver of the \$750,000 maximum home value to the agency's discretion. This Board has held that "when regulations vest discretion in an agency . . . the agency's judgment will not be disturbed unless the determination is arbitrary, capricious, or clearly erroneous." *William F. Brooks, Jr.*, CBCA 2595-RELO, 12-2 BCA ¶ 35,064, at 172,328, and cases cited therein.

Waiver determinations must be supported by objective market data. *See David Harbour*, CBCA 3462-RELO, 14-1 BCA ¶ 35,493, at 173,994. In *Harbour*, the AF also used tax assessment records in lieu of the employee's alternate valuation methods. The Board in *Harbour* made clear that as long as the method the AF used was not arbitrary, capricious, or

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<sup>1</sup> DoD National Relocation Program (DNRP), DNRP Handbook (rev. 04-2017), <https://www.nab.usace.army.mil/Portals/63/docs/RealEstate/DNRP%20Handbook%204-18-2017.pdf?ver=2017-04-18-095526-683> (last visited on December 18, 2025).

clearly erroneous, the Board will uphold the AF's determination of the appropriate valuation waiver. *Id.*

Claimant challenges the approved waiver amount, contending that the AF derived the value of its waiver from the county tax assessment rather than from a professional appraisal. He argues that county assessments often diverge from market values, particularly where homeowners have invested substantially in remodeling and renovations. He further contends that the DNRP Handbook references the use of professional appraisals to establish purchase prices and does not specify the use of county tax assessments, noting that his informal appraisal conducted with a real estate team indicates a higher valuation. None of these assertions override the agency's discretion as established under the JTR.

Claimant also asserts that the approved waiver amount falls below his total investment, including renovations, and that acceptance of the waiver will result in significant financial loss. The Board has repeatedly held that equity cannot override law. The approved waiver amount is \$330,000 above claimant's purchase price of \$750,500, which reflects a significant waiver.

We find that the tax assessment data used by the AF to determine the valuation of the property, although different from the method used by the claimant, was not arbitrary, capricious, or clearly erroneous. The agency acted within its discretion in using the tax assessment, and claimant's original purchase price of \$750,500 to support its determination of the property's value when waiving the valuation limit set in the JTR.

#### Decision

The claim is denied.

Patricia J. Sheridan  
PATRICIA J. SHERIDAN  
Board Judge