



UNITED STATES
CIVILIAN BOARD OF CONTRACT APPEALS

February 13, 2026

CBCA 8691-RELO

In the Matter of TAMARA S.

Tamara S., Claimant.

Alexander Falciani, Office of General Counsel, General Services Administration, Philadelphia, PA, appearing for General Services Administration.

VOLK, Board Judge.

Claimant, a former employee of the General Services Administration (GSA), seeks reimbursement of relocation expenses, asserting that GSA directed her to move from Texas to Kentucky in December 2023 and then back to Texas in September 2024. We deny the claim.

Background

Claimant worked remotely from her home in the Houston, Texas, area until flooding made her home uninhabitable in December 2023. Claimant states that she was unable to find new housing in the Houston area and, after discussing her situation with her supervisor, temporarily moved to Kentucky to stay with a family member.

Claimant asserts that her supervisor directed her to move to Kentucky. According to claimant, she believed her supervisor “probably” considered the move to be “primarily in the interest of the Government, rather than only for [claimant’s] own convenience as an employee” because “this temporary relocation [was] cheaper than the Government paying for long-term temporary housing.” However, claimant has not presented any evidence that GSA ever considered paying for her housing. While living in Kentucky, claimant continued

working remotely. She returned to the Houston area in September 2024, allegedly at her supervisor's direction.

In response to the claim, GSA asserts that claimant was not directed or approved to relocate by anyone with authority to do so within GSA.

Discussion

Under 5 U.S.C. § 5724 (2018), when prescribed by regulation and approved by an agency head or designee, an agency shall pay “the travel expenses of an employee transferred in the interest of the Government from one official station or agency to another for permanent duty.” 5 U.S.C. § 5724(a)(1). Relocation benefits under that provision are subject to various conditions and limitations. Here, we consider only the threshold question of whether claimant has established that she received a transfer within the meaning of 5 U.S.C. § 5724(a)(1). The burden is on claimant to make that showing. *See* Rule 401(c) (48 CFR 6104.401(c) (2024)) (“The burden is on the claimant to establish . . . the liability of the agency . . .”).

Claimant asserts that her moves to and from Kentucky were directed by her supervisor, but she has not presented persuasive evidence of that assertion, rendering it unnecessary to consider whether the supervisor had authority to authorize the alleged transfer. Claimant relies on two Standard Form (SF) 50s, among other documents, that show that her home was classified as her duty station during the relevant period. The SF-50s indicate that claimant's duty station was temporarily changed to Kentucky, with her locality pay adjusted accordingly, during the period in which she was living and working in Kentucky. The SF-50s do not, however, establish that claimant was “transferred in the interest of the Government” for permanent duty in Kentucky. 5 U.S.C. § 5724(a)(1). Claimant has not demonstrated that she received a transfer from GSA that could make her eligible for the relocation benefits she seeks.

Decision

The claim is denied.

Daniel B. Volk
DANIEL B. VOLK
Board Judge