



Comptroller General  
of the United States

Washington, D.C. 20548

# Decision

**Matter of:** Jack D. Draper - Relocation Expenses - Mobile Home

**File:** B-254163

**Date:** April 4, 1994

## DIGEST

1. An employee who moved his mobile home incident to his transfer may not be reimbursed as a transportation expense for the cost of leveling (grading) the property on which he located the home. If he can show that he incurred a cost for leveling the mobile home itself, incident to blocking and anchoring it, he may be reimbursed that amount. Also, costs of permits and charges for installation of utilities and materials for installation of a new power pole are not reimbursable as transportation expenses.

2. An employee who moved his mobile home incident to his transfer may not be reimbursed under the miscellaneous expenses allowance for leveling (grading) the property on which it was placed or for material to install a new power pole. These costs are for site alterations and new items not covered by the allowance. Claims for utility permits and fees may be covered in part under the allowance if the employee provides appropriate explanation and receipts for expenditures, but in their absence he is limited to the flat \$700 allowance he has been paid.

## DECISION

This is in response to a request for a decision whether payment may be made on four items included in Mr. Jack D. Draper's claim for reimbursement of expenses incurred in moving his mobile home incident to a transfer of duty station. Mr. Draper's employing agency, the Bureau of Reclamation, Department of the Interior, initially disallowed the items in question, but at Mr. Draper's request, subsequently submitted the matter to us.<sup>1</sup>

<sup>1</sup>The matter was submitted by the Authorized Certifying Officer, Bureau of Reclamation, Denver Office.

## Background

The record submitted to us is sparse, but it appears that Mr. Draper was transferred by the agency in 1992, incident to which he moved his mobile home to his new duty station, giving rise to the following items of expense for which he claims reimbursement:

1. \$795.46, described as leveling for mobile home;
2. \$1,326.96 for utility fees;
3. \$116.00 for homeowner's permits;
4. \$211.75 for materials to install a new power pole.

The agency disallowed these items primarily on the basis that they were incurred in connection with structural alterations, leveling of the entire property, or were newly acquired items that are not reimbursable. The agency also states that Mr. Draper was paid a \$700 miscellaneous expense allowance, which was intended to cover costs such as utility fees or nonrefundable deposits, fees for connecting and disconnecting appliances, etc.

Mr. Draper, however, argues that all of these items are allowable under the agency's regulations, and he states that he had no newly acquired items and there were no structural alterations. The record before us, however, contains no detailed explanation of these expenses nor any receipts or other documentation showing to whom and for what the amounts claimed were paid.

## Analysis

The Federal Travel Regulation (FTR), 41 C.F.R. Part 302-7,<sup>2</sup> prescribes the allowances provided for the "transportation" of an employee's mobile home incident to a transfer. Under these provisions, the allowance for transportation includes costs generally associated with resettling the mobile home at the destination including, but not limited to, the costs of blocking, which includes anchoring the mobile home. FTR § 302-7.3(d) (amendment 20, effective Sept. 17, 1991). These items are generally understood to relate to resettling the mobile home at its destination by leveling it on blocks and anchoring it in place.

As to the \$795.46 Mr. Draper claims for leveling, there is no explanation from him in the record before us as to what this entailed. However, the agency indicates it was the

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<sup>2</sup>Implementing 5 U.S.C. § 5724(b).

cost of leveling the entire property, which we assume means grading or altering the lot on which the mobile home was placed. Such a cost is not generally associated with the transportation of a mobile home, and it is not reimbursable under FTR § 302-7.3. However, if some portion of this cost was for leveling and blocking the mobile home itself, and Mr. Draper can establish to the agency's satisfaction the amount he actually paid that is applicable to that service, he may be reimbursed that amount as a transportation expense.

In addition FTR § 302-7.3(e) specifically provides that the transportation allowance shall not include costs for replacement parts, structural repairs or any other repairs or maintenance, or for costs of connecting and disconnecting appliances, equipment and utilities involved in relocation. (This section refers instead to FTR Part 302-3 which relates to the miscellaneous expense allowance.) Thus, section 302-7.3(e) precludes payment of Mr. Draper's claims for utility fees and materials to install a new power pole from reimbursement as transportation expenses. Similarly precluded under this section is Mr. Draper's \$116.00 claim for the expense of homeowner's permits, which he states were various permits for utilities.

We now turn to FTR Part 302-3,<sup>1</sup> the regulations governing the miscellaneous expenses allowance, to determine whether any of Mr. Draper's claims warrant further reimbursement under those provisions.

The costs intended to be covered by the miscellaneous expenses allowance are expenses that are common to living quarters, furnishings, household appliances, other general types of costs inherent in relocation of a place of residence, including fees for disconnecting and connecting appliances, equipment, and utilities and utility fees or deposits that are not offset by eventual refunds. FTR § 302-3.1. (This regulation also refers to FTR Part 302-7, supra, for specific costs normally associated with relocation of a mobile home that are covered under transportation expenses.)

Types of costs not intended to be reimbursed by the miscellaneous expenses allowance include costs which are disallowed elsewhere in the regulation; costs reimbursed under other provisions of law or regulation; costs of newly acquired items; and costs incurred in connection with structural alterations. FTR § 302-3.1(c).

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<sup>1</sup>Implementing 5 U.S.C. § 5724a(b).

The allowance is payable in either of two ways. First, it may be paid as a flat amount, which in the case of an employee with a family is \$700 or the equivalent of 2 weeks' basic pay, whichever is the lesser amount. FTR § 302-3.3(a). Or, second, a greater amount may be authorized or approved if supported by acceptable statements of fact and either paid bills or other acceptable evidence justifying the amounts claimed. The aggregate amount of this second type, for an employee with a family, may not exceed 2 weeks of the employee's basic pay, but in no case may it exceed 2 weeks' basic pay at the maximum rate of grade GS-13. As noted previously, Mr. Draper has been paid the \$700 flat amount.

Under these provisions, Mr. Draper's claim for "leveling" for his mobile home is not payable since, to the extent it includes leveling, blocking and anchoring the mobile home, it would be covered under Part 302-7 of the FTR as part of transportation charges. To the extent it is a charge for leveling (grading) the lot, it is a site alteration which is analogous to a structural alteration, which is not payable under the miscellaneous expenses allowance. See B-191724, March 29, 1979.

Concerning the amount claimed for materials to install a new power pole, it too is not reimbursable under the miscellaneous expenses allowance since it appears to be a charge for newly acquired items, as the agency indicates, or for materials related to structural or site alterations.

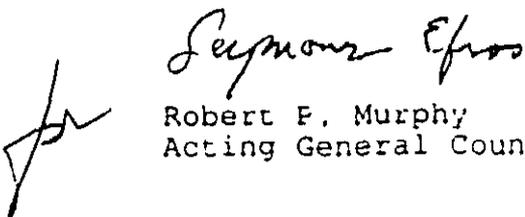
As to the \$1,326.96 claimed for utility fees, and the \$116 claimed for homeowner's permits for utilities, at least to some extent they may fall within the categories of connecting utilities and utility fees or deposits not offset by eventual refunds. However, the amounts claimed appear to exceed the usual costs of these categories of expenses covered by the regulation.<sup>4</sup> Also, no detailed explanations, receipts or other documentation appear in the record, as required by the regulations if an amount in excess of the

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<sup>4</sup>Fees reimbursable under these provisions are contemplated to be the usual charges for connecting utilities to the mobile home and may, in addition, include some minor structural alterations such as drilling a hole in a wall, but charges for installing new utility service in a residence are not covered. See Prescott A. Berry, 60 Comp. Gen. 285 (1981). Thus, to the extent the items Mr. Draper claims are for the costs of installing new service at the site from elsewhere by installing utility poles, and laying gas, water and sewage lines, they would appear to be site or structural alterations not covered by the miscellaneous expenses allowance.

\$700 flat amount is to be paid. Therefore, we agree with the agency that, based on this record, Mr. Draper is not entitled to any additional payment under the miscellaneous expenses allowance provisions in addition to the \$700 he has been paid.

On the present record, therefore, we find no basis to allow any additional amount for the expenses Mr. Draper claims either as transportation expenses or miscellaneous expenses. Accordingly, the agency's disallowance of his claims is sustained.



*Seymour E. Fross*

Robert F. Murphy  
Acting General Counsel