



July 2025

MILITARY COMPENSATION

Clearer Guidance Needed for Timely Reimbursement of Moving Expenses

GAO Highlights

Highlights of [GAO-25-107062](#), a report to the Committee on Armed Services, House of Representatives

Why GAO Did This Study

In 2024, more than 400,000 service members received PCS travel orders and moved to a new duty station. When the military services order these moves, service members are entitled to timely PCS reimbursements to cover costs. A January 2023 report by the Suicide Prevention and Response Independent Review Committee cited delayed payments, especially PCS reimbursements, as a financial stressor associated with suicide risk for service members.

House Report 118-125 includes a provision for GAO to review delayed payments to service members, with an emphasis on PCS reimbursement delays. GAO's review assesses the extent to which (1) DOD has guidance on monitoring timelines for PCS reimbursements and (2) the Army and Marine Corps monitor and address delays in PCS reimbursements.

GAO analyzed guidance related to the monitoring of PCS reimbursements; interviewed DOD and military service finance officials; and analyzed PCS data from fiscal years 2021 through 2023 (the latest complete year of data available at the time of GAO's data request and review).

What GAO Recommends

GAO recommends that DOD clarify language in the FMR related to reimbursement timelines and that the Army and Marine Corps each establish single entities to monitor PCS reimbursement timeliness and resolve problems expeditiously. DOD concurred with the first two recommendations and did not concur with the third recommendation. GAO continues to believe that each of its recommendations are warranted, as discussed in this report.

For more information, contact Rashmi Agarwal at AgarwalR@gao.gov.

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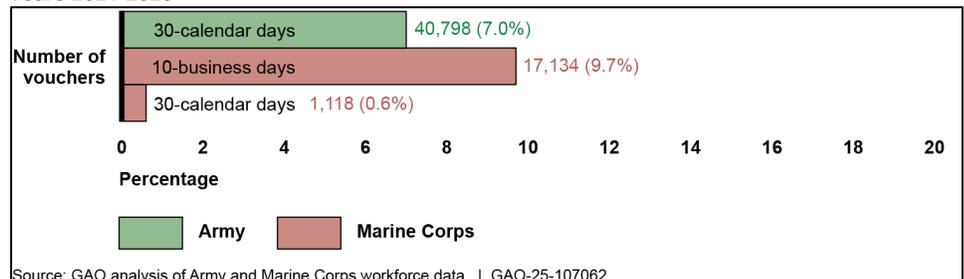
What GAO Found

DOD's *Financial Management Regulation* (FMR) includes timelines for reimbursing service members for costs incurred for permanent change of station (PCS) moves. However, GAO found that parts of the FMR guidance are unclear and have inconsistent PCS reimbursement timelines—including both a 30-calendar day and a 25-business day timeline. Military service officials told GAO that this lack of clarity causes confusion. Without clear guidance, service members might carry the burden of moving costs beyond a reasonable period.

GAO reviewed 3 fiscal years of PCS data from two selected military services—the Army and the Marine Corps—to identify the extent to which such reimbursements were delayed, monitored, and addressed. GAO found that these services regularly monitor PCS reimbursements through multistep reviews and post-payment audits. However, instances of delays persist. Specifically, during the 3-year period, GAO found the following delays, by service:

- **Army.** Of the 586,417 PCS voucher reimbursements processed, 40,798 (7.0 percent), were delayed beyond the 30-calendar day time frame the Army follows under the FMR. Of those, most were paid within 31 to 60 calendar days. These delays totaled almost \$139 million in reimbursements.
- **Marine Corps.** Of the 176,216 voucher reimbursements processed, 17,134 (9.7 percent) were delayed beyond the 10-business day time frame the Marine Corps follows. Most of those delays, which totaled almost \$47 million, were paid within 11 to 20 business days. Had the vouchers been processed using the 30-day calendar time frames in the FMR, the Marine Corps would have 1,118 voucher reimbursements processed (0.6 percent), totaling \$5.7 million, delayed in that period.

Number and Percent of PCS Reimbursement Delays for the Army and the Marine Corps, Fiscal Years 2021-2023



Source: GAO analysis of Army and Marine Corps workforce data. | GAO-25-107062

Note: The Army follows a 30- and the Marine Corps a 10-day timeline for voucher reimbursements. The data reflect the number and percentage of permanent change of station (PCS) transactions involving service members and excludes data related to sensitive or classified PCS relocations.

Army and Marine Corps officials cited challenges associated with processing PCS reimbursements on time, including multiple offices being involved and higher staffing needs, particularly during summer months. Each service lacks a single entity with authority and responsibility to monitor and address problems associated with such delays. Such an entity for each service could help improve their ability to resolve delays expeditiously and help ensure timely PCS reimbursements to service members.

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Abbreviations

DFAS	Defense Finance and Accounting Service
DOD	Department of Defense
PCS	Permanent Change of Station

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July 16, 2025

The Honorable Mike Rogers
Chairman
The Honorable Adam Smith
Ranking Member
Committee on Armed Services
House of Representatives

In fiscal year 2024, the Department of Defense (DOD) employed about 1.3 million active-duty service members worldwide, of which approximately 400,000 moved under official permanent change of station (PCS) travel orders issued by their military service. The military services reimburse service members for certain expenses related to these moves. These reimbursements cover the following costs, among others:

- a per diem allowance for lodging, meals, and incidental expenses;
- a dislocation allowance for expenses related to the movement of their household goods; and
- a transportation allowance for travel-related fees service members might incur while moving from one duty station to another, such as airplane tickets (or a monetary allowance in lieu of transportation).

In January 2023, DOD’s Suicide Prevention and Response Independent Review Committee issued a report citing payment delays as among financial stressors they identified as being associated with potential suicide risks to service members. That report identified payment delays—notably PCS reimbursements—as a high priority for DOD’s attention.¹ A House Armed Services Committee Report accompanying a bill for the

¹Suicide Prevention and Response Independent Review Committee (hereafter, the Committee). *Preventing Suicide in the U.S. Military: Recommendations from the Suicide Prevention and Response Independent Review Committee*. Department of Defense (DOD), March 22, 2022. <https://media.defense.gov/2023/Feb/24/2003167430/-1-1/0/SPRIRC-FINAL-REPORT.PDF>. Established in response to a statutory requirement, the Committee conducted a review of clinical and non-clinical suicide prevention and response programs in the DOD. The Committee relied primarily on a review of the literature, interviews with key stakeholders, and nine installation site visits where they conducted focus groups with over 2,000 selected service members. This review resulted in the Suicide Prevention and Response Independent Review Committee making 127 recommendations to DOD, including recommendations to examine payment delays.

National Defense Authorization Act for Fiscal Year 2024 includes a provision for us to review payment delays, with an emphasis on delays in PCS reimbursements to service members.² Our review assesses the extent to which (1) DOD has guidance on monitoring timelines for PCS reimbursements and (2) selected services—the Army and the Marine Corps—monitor and address delays in PCS reimbursements to service members.

To address the first objective, we analyzed DOD’s guidance related to the monitoring of PCS reimbursements. We interviewed officials from the DOD Comptroller’s Office, the Defense Finance and Accounting Service (DFAS), and the Defense Travel Management Office about PCS reimbursement processing policies. We also interviewed finance officials from the Army, Navy, Marine Corps, Air Force, and Space Force for the same purpose.³ We compared DOD’s guidance with *Standards for Internal Control in the Federal Government*, specifically the principles that management should use quality information to achieve the entity’s objectives and implement control activities through policies.⁴

For the second objective, we analyzed guidance and data related to PCS monitoring and reimbursements from the Army and the Marine Corps, as well as internal control standards relative to monitoring data and expeditiously addressing risks. We selected the Army and the Marine Corps because they represented the services with the largest and smallest number of active-duty service members, respectively.⁵ We then verified that those two services could provide sufficiently reliable PCS data to us within a reasonable period. We interviewed finance officials from DFAS, the Army, and the Marine Corps to understand the extent to which each service monitors or is aware of PCS reimbursement delays, the reasons for the delays, and their ability to resolve the delays.⁶

²H.R. Rep. No. 118-125, at 181 (2023).

³Air and Space Force officials told us they work as a single entity when processing PCS reimbursements. We treat them as one entity (i.e., Air/Space Force officials) in this report.

⁴GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

⁵We selected the largest and the smallest military services based on military population size to allow for the possibility that differences in PCS reimbursement delays could result from the disparity in the number of PCS moves.

⁶DFAS primarily processes PCS reimbursements for the Army.

We analyzed the Army's and Marine Corps's PCS data over 3 years—from fiscal year 2021 through fiscal year 2023 (the latest complete year of data available at the time we submitted our data requests)—to understand the extent to which PCS reimbursements to service members were delayed, the amounts owed, and reasons for delays. We determined that the data were sufficiently reliable for the purposes of reporting PCS reimbursement delays. We also compared the Army's and Marine Corps's oversight of PCS payment reimbursements with *Standards for Internal Control in the Federal Government*, including principles relating to establishing monitoring activities and remediating deficiencies on a timely basis.⁷

We conducted this performance audit from September 2023 to July 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

PCS Travel Order and Voucher Processes

The military services generally order each service member to move to a new duty station once every 2 to 4 years to meet service needs. Typically, the services issue official travel orders about 60 to 120 days prior to these PCS moves, according to service officials. In the time leading up to a move, a service member prepares for the move, which may include requesting an advance payment. Such advance payments are disbursed prior to a PCS move to help cover the service member's out-of-pocket expenses.

Upon arrival to a new duty station, DOD officials told us that the service member must update their personnel records (e.g., new address, phone number, etc.) and submit a properly prepared voucher within 5 days of arrival. Doing so helps ensure timely processing and disbursement of PCS reimbursements by their military service. The services also take steps to help service members with the reimbursement process. For example, the Air Force provides a checklist to service members who are moving on PCS travel orders to help ensure each service member

⁷[GAO-14-704G](#).

properly prepares their PCS voucher for reimbursement. The Air Force also provides training to service members, during which it reminds them to check in within the first 5 business days of arrival. Figure 1 highlights parts of the Air Force checklist, which remind service members to ensure they attach copies of receipts and travel orders.

Figure 1: Air Force Checklist for Permanent Change of Station Reimbursements

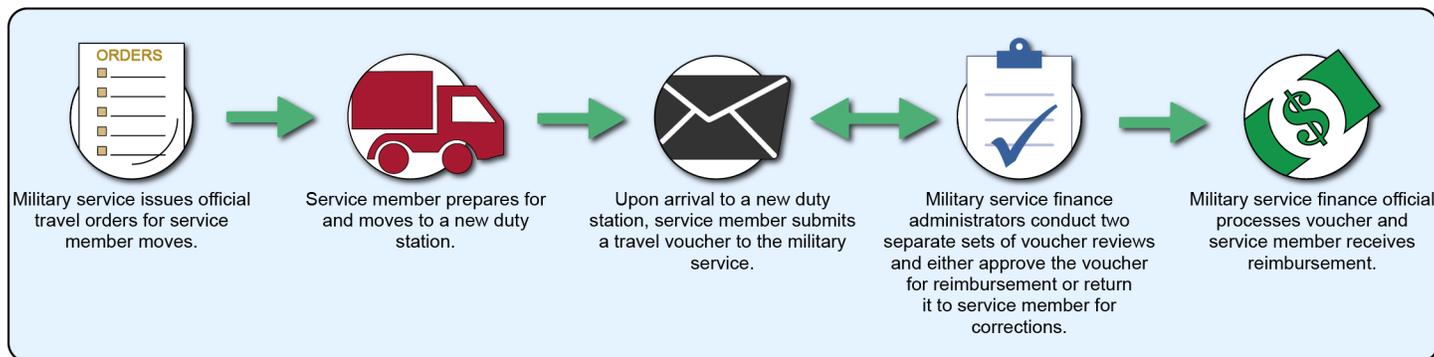
Active Duty PDT Entitlements (PDT, PPM, TLE, Dep Tvl, etc.) Checklist							
CUSTOMER USE							
	Traveler's Name:						
	Traveler's SSN:	DOD ID (Back of CAC):	Order #:		YES	NO	N/A
1	DATA MASKED Information-Does voucher or supporting documents contain data masked (classified) information? Was any portion of your travel to/from a data masked (classified) location?						
2	Is your personal information correct and legible? (Name, grade, SSN, mailing address, <u>email address</u> and phone number)						
3	Does the travel order number on the voucher match the travel order number filed with the voucher?						
4	Is itinerary correct and legible to include verification of dates traveled, places, modes of travel, reasons for stops, lodging costs and POC/Terminal Is itinerary correct and legible to include verification of dates traveled, places, modes of travel, reasons for stops, lodging costs and POC/Terminal mileages (if applicable)?						
5							
6							
7							
8							
9	Are all <u>expenses claimed</u> and <u>required receipts</u> attached to include itemized lodging and any expense \$75.00 or more? Use DD Form1351-2C for additional expenses. If you are missing receipts for any expense claimed, use a local "missing receipt form" (obtained from The Finance Office).						
10	Are all <u>expenses claimed</u> and <u>required receipts</u> attached to include itemized lodging and any expense \$75.00 or more? Use DD Form1351-2C for additional expenses. If you are missing receipts for any expense claimed, use a local "missing receipt form" (obtained from The Finance Office).						
11	If you shipped a vehicle at government expense, is DD Form 788 (front and back) with appropriate signatures attached?						
12	For Per Diem						
13	Are you in compliance with the following requirements: telephone number, date DD Form 1351-2 Form 1351-2 in Block 29? (MANDATORY, if you claim actual meal cost in reimbursable expenses)						
14	Are copies of travel orders attached to include amendments? NOTE: Front and back of orders (if applicable) are required.						
15	If TDY enroute and leave was taken, is any period(s) of leave taken while at the TDY enroute location annotated on the voucher to prevent the payment of Per Diem while on leave? Is the leave form(s) approved by the TDY Commander attached?						
16	Did you sign and date the DD Form 1351-2? (MANDATORY)						
17	If this is your first Permanent Duty Travel (PDT), ensure you establish your travel payment account information by completing SF 1199A or FMS 2231.NOTE: You cannot be reimbursed for travel expenses until this information is provided.						
18	For TDY enroute only:1)If locations listed are not on orders, are amendments attached or variations authorized?2)If TDY was LESS THAN 12 hours, did you claim actual meal cost in reimbursable expenses?						
19	Did you complete the PDT arrival worksheet and included it with your voucher?						
20	Traveler's signature:		Date:				

* ONLY ONE COPY OF THE TRAVEL VOUCHER, ORDERS AND RECEIPTS ARE REQUIRED WITH THIS CHECKLIST
 * TO BE CONSIDERED A VALID RECEIPT IT MUST SHOW THE COMPANY NAME, DATE SERVICES WERE PROVIDED, UNIT PRICE OF ITEM/SERVICE, AMOUNT "PAID" AND "AMOUNT DUE" OF \$0.00 OR EVIDENCE OF PAYMENT
 * IT IS YOUR RESPONSIBILITY TO RETAIN A COPY OF THE TRAVEL VOUCHER, ORDERS, AND RECEIPTS. THE FINANCE OFFICE DOES NOT RETAIN COPIES.

Source: United States Air Force | GAO-25-107062

A properly prepared voucher includes, among other things, receipts for lodging and all other expenses totaling \$75 or more and a copy of the service member’s travel orders.⁸ Upon receipt of a voucher, a military service finance administrator reviews it for accuracy. If the voucher is correct, a military service finance official processes it and the service member is reimbursed, according to agency officials. If the voucher is not correct or is missing required documentation, finance officials told us they return it to the service member or their leadership for correction. Once corrected, service members must resubmit the voucher and required documentation. Figure 2 depicts the PCS voucher process.

Figure 2: The PCS Voucher Process for Reimbursement



Source: GAO analysis of DOD information. | GAO-25-107062

Roles and Responsibilities Regarding PCS

The following entities have roles and responsibilities related to PCS moves or reimbursements:

The Under Secretary of Defense (Comptroller) establishes and oversees the *Financial Management Regulation* guidance and requirements, including the processing of PCS vouchers and monitoring of reimbursements.⁹ The Comptroller’s office makes final decisions on any updates to that regulation submitted by other DOD entities.

⁸DD Form 1351-2, Travel Voucher or Subvoucher.

⁹DOD 7000.14-R, *Financial Management Regulation*, vol. 9.

The Defense Finance and Accounting Service, under the authority of the Comptroller, standardizes, consolidates, and improves accounting and financial functions for DOD.¹⁰ For example, DFAS policy officials draft or update chapters of the *Financial Management Regulation* on the Comptroller's behalf. DFAS processes all PCS reimbursement vouchers for the Army.¹¹ It also processes some PCS vouchers for other military services as needed.

The Defense Travel Management Office, under the supervision of the Assistant Secretary of Defense for Manpower and Reserve Affairs, implements laws and policies establishing travel and transportation allowances for service members.¹² That office also coordinates and engages with travel and allowance governance boards, including the Per Diem, Travel, and Transportation Allowance Committee, which updates and publishes the *Joint Travel Regulations*.¹³ The *Joint Travel Regulations* implement policy and laws establishing travel and transportation allowances of uniformed service members and DOD civilian travelers.

Military Service finance officials are responsible for processing service member vouchers and ensuring reimbursements are made in a timely manner.¹⁴ Each military service is responsible for following DOD's *Financial Management Regulation*. The military services also have their own service-specific policies regarding PCS voucher processing. To

¹⁰DOD 7000.14-R, vol. 9.

¹¹DFAS has a Mission Work Agreement with the Army to process all their PCS payments.

¹²DOD Instruction 5154.31, vol. 1, *Commercial Travel Management: Defense Travel Management Office* (Oct. 16, 2015); DOD, the *Joint Travel Regulations* (Apr. 1, 2025).

¹³DOD Instruction 5154.31, vol. 5, *Commercial Travel Management: The Per Diem, Travel and Transportation Allowance Committee* (Oct. 16, 2015). The Per Diem, Travel, and Transportation Allowance Committee (the Committee) updates and publishes the *Joint Travel Regulations*. The Committee is composed of a Chair and a member representing the Departments of the Army, the Navy, the Air Force, Homeland Security, Health and Human Services, and Commerce. The Committee Chair is the Director, Defense Human Resources Activity.

¹⁴DOD 7000.14-R, vol. 9, ch. 5, *Temporary Duty Travel (TDY) and Travel Advances* (January 2024) and ch. 6, *Permanent Duty Travel* (May 2023); and DOD, the *Joint Travel Regulations*, (Apr. 1, 2025). Military service finance officials include those of the Army, Navy, Marine Corps, Air Force, and Space Force.

process service member vouchers, each military service uses various information technology systems.¹⁵

DOD Guidance Outlines Processes for Military Services to Monitor PCS Reimbursements but Reimbursement Timelines Are Unclear

DOD establishes PCS voucher processing and reimbursement requirements and guidance for the military services in the *Financial Management Regulation* and the *Joint Travel Regulations*.¹⁶ However, some guidance pertaining to PCS reimbursements in the *Financial Management Regulation* does not clearly establish reimbursement timelines, which makes monitoring and enforcing timelines more difficult, according to military service officials.

DOD Guidance Outlines Processes for Military Services to Monitor PCS Reimbursements to Service Members

DOD guidance establishes requirements for the processing of PCS vouchers and the monitoring of reimbursements. DOD's *Financial Management Regulation* provides general requirements for the preparation, submission, and processing of properly prepared PCS travel vouchers.¹⁷ For example, the regulation requires service members to submit properly completed travel vouchers and attach required receipts within 5-business days of arriving at their new duty station so that they can be reimbursed for expenditures related to PCS moves.¹⁸

The military services are responsible for following the *Financial Management Regulation* for monitoring and processing PCS reimbursements. For example, the *Financial Management Regulation* requires that military services disburse PCS reimbursements to service members in a timely manner—generally, within 30 calendar days.¹⁹ The

¹⁵For example, the Army and Navy process PCS vouchers using the Integrated Automated Travel System. The Air/Space Force processes PCS vouchers using the Reserve Travel System. The Marine Corps processes PCS vouchers for reimbursements using the Integrated Automated Travel System and the Marine Corps Total Force System.

¹⁶DOD 7000.14-R, vol. 9; and DOD, the *Joint Travel Regulations* (Apr. 1, 2025).

¹⁷DOD 7000.14-R, vol. 9, ch. 5, *Temporary Duty Travel (TDY) and Travel Advances* (January 2024); and ch. 6, *Permanent Duty Travel* (May 2023).

¹⁸DOD 7000.14-R, vol. 9 refers to “working” days, but we use “business” days in each instance instead.

¹⁹DOD 7000.14-R, vol. 9, ch. 5 & 8, *Temporary Duty Travel and Travel Advances and Processing Travel Claims* (April 2024).

Financial Management Regulation also requires the military services to monitor advance payments for PCS moves.²⁰

DOD also publishes the *Joint Travel Regulations*, which implement laws and policies establishing travel and transportation allowances for service members.²¹ The *Joint Travel Regulations* define rules for all PCS travel by service members or their dependents as well as for the shipment and storage of their belongings. The regulations also address eligibility requirements for various PCS allowances, such as transportation and per diem.

In addition to the *Financial Management Regulation* and *Joint Travel Regulations*, DOD has an instruction that establishes policy, responsibilities, and procedures for implementing risk management and internal controls, such as those for financial systems and financial reporting.²² Under the DOD instruction, each military department is responsible for establishing its own internal control program, which includes provisions on financial systems and financial reporting monitoring. DOD's internal control procedures are intended to align with the *Standards for Internal Control in the Federal Government*.²³ For example, each military department must assess the effectiveness of its internal controls through a process, in accordance with GAO's *Standards for Internal Control in the Federal Government*, among other sources. The Army, Navy, Air/Space Forces, and the Marine Corps have each established and implement their own internal control policy.²⁴

²⁰DOD 7000.14-R, vol. 9, ch. 5.

²¹DOD, the *Joint Travel Regulations* (Apr. 1, 2025).

²²DOD Instruction 5010.40, *DOD Enterprise Risk Management and Risk Management and Internal Control Program* (Dec. 11, 2024).

²³[GAO-14-704G](#).

²⁴Army Regulation 11-2, *Risk Management and Internal Control Program* (July 16, 2024); Secretary of the Navy Instruction 5200.35G, *Department of the Navy Managers' Internal Control Manual* (Mar. 29, 2019); Air Force Instruction 65-201, *Financial Management: Risk Management and Internal Control Program Procedures* (Apr. 24, 2023); and Marine Corps Order 5200.24F, *Marine Corps' Risk Management and Internal Control Program* (Dec. 18, 2024).

DOD Guidance Related to PCS Reimbursement Timelines Is Unclear

The *Financial Management Regulation* is unclear and has inconsistent timelines for PCS reimbursements, including those that apply to advance payments, based on our analysis and interviews with Army, Navy, and Marine Corps officials.²⁵ Specifically, the *Financial Management Regulation*, **Chapter 8**—dedicated to processing travel claims (e.g., temporary duty, PCS, etc.)—provides that PCS reimbursements, which would include those with an advance payment, must be paid no later than 30 calendar days from the date a properly prepared voucher is received; otherwise, a late payment fee may be required.

However, two other chapters in the *Financial Management Regulation* have differing guidance:

- **Chapter 5**—dedicated to (1) temporary duty travel (i.e., a type of travel distinct from PCS) and (2) travel advances—provides that travel vouchers should be paid no later than 25-business days after the end of the trip. This would potentially apply to reimbursements for PCS where an advance payment is involved;²⁶ and
- **Chapter 6**—dedicated to PCS—does not specifically identify a time frame for reimbursement of vouchers at all. The chapter does discuss a time frame for advance payment of dislocation allowances (a specific type of allowance that partially reimburses service members for expenses incurred while moving their households), but the time frame is for payment in *advance* of

²⁵A PCS reimbursement could be necessary even where the service member received an advance payment for the move—for example, where the allowable costs of the move exceeded the advance payment, a service member might seek reimbursement for the difference.

²⁶Chapter 5 elsewhere introduces yet another time frame, providing that, in the case of advance payments, DOD components must implement internal controls to assure that travelers are paid amounts owed them within 15 business days after the paying office receives the voucher. DOD 7000.14-R, vol. 9, ch. 5.

travel, rather than reimbursement of the eventual claim *after* travel.²⁷

Thus, the timelines do not begin on the same day (date voucher received versus date travel ended) or necessarily involve the same time periods (30 calendar days versus 25 business days). Yet, both timelines may apply to PCS reimbursements, including for moves involving an advance payment. The *Financial Management Regulation* does not resolve the inconsistencies or provide greater clarity.

Finance officials for some military services (i.e., DFAS—on behalf of the Army, and the Navy) told us they apply the 30-calendar day timeline (and not the 25-business day timeline) to track all reimbursement delays regardless of whether it applies to PCS reimbursements involving an advance.²⁸ Additionally, officials from some military services—Army, Navy, and Marine Corps—told us that they did not know that some of the guidance related to advance payments applied to PCS moves.²⁹ Army, Navy, and Marine Corps finance officials told us that they find parts of the guidelines confusing and difficult to interpret. Figure 3 shows various provisions in the *Financial Management Regulation* that are inconsistent, unclear, and housed in separate chapters.

²⁷DFAS finance officials told us that advances for dislocation allowances was added to Chapter 6 in 2023 in response to the Secretary of Defense’s “Taking Care of Our Service Members and Families” policy memorandum. According to these officials, it was included in Chapter 6 because it is specific to PCS travel, and it allows for an advance payment 30 days prior to travel rather than 10 days prior to travel for other travel advances. The provision also states that the conditions related to final settlement of travel allowances outlined in Chapter 5 remain in effect, which may suggest that the 25-day time frame identified in Chapter 5 might apply for reimbursement after travel. However, this time frame is not specifically identified. DOD 7000.14-R, vol. 9, ch. 6.

²⁸Finance officials with the Air/Space Forces and the Marine Corps choose to follow more restrictive timelines, 15-calendar days for the Air/Space Forces and 10-business days for the Marine Corps.

²⁹DFAS finance officials told us that the general advance payment information in Chapter 5 applies to both temporary duty travel and PCS travel and stated that they were aware that listing both topics in the same chapter causes confusion. They also told us that, as a result, they proposed in 2019 that the two topics be addressed in separate chapters. However, that has not yet been clarified in the *Financial Management Regulation*.

Figure 3: Examples of Inconsistent Timelines from DOD's *Financial Management Regulation*

DoD 7000.14-R **Financial Management Regulation** **Volume 9, Chapter 8**
* April 2024

Civilian Board of Contract Appeals
ATTN: Clerk of the Board
1800 F Street, NW.
Washington, DC 20405

DoD 7000.14-R **Financial Management Regulation** **Volume 9, Chapter 6**
*May 2023

8.3 Waivers

Travelers or Component employees may request a waiver of the travel claim submission and transportation allowances requirements.

8.4 Unions and Third-Party Claims

When covered by a collective bargaining agreement, the Civilian Board of Contract Appeals (CBA) will process the claim unless the matter of travel claim is covered by a collective bargaining agreement.

3.3.3. **Claim Submission.** Submit the travel settlement voucher, **DD Form 1351-2**, Travel Voucher or Subvoucher, within 5 working days of arrival at the new PDS.

3.3.4. **Payment.** If the claim is proper and supported by the appropriate documentation, the disbursing office must pay the claim.

DoD 7000.14-R **Financial Management Regulation** **Volume 9, Chapter 5**
*January 2024

9.0 CLAIM FOR LATE PAYMENT FEE

The Travel and Transportation Reform Act of 1998 ([Public Law 105-264](#)), governs the claim for late payment fees for late processing of a traveler's travel claim.

9.1 **Submission of Travel Claim**

Travelers must submit a properly prepared travel claim to their supervisor/approving official within five working days after completion of travel. The disbursing office pays the travel claim within 30 calendar days after the claim is signed and dated as received by the supervisor/approving official. The supervisor/approving official or the travel computation office has seven calendar days to notify the traveler if the travel claim is not proper or complete for payment.

4.2.2. Ensure that travelers submit vouchers within established time frames, as provided in paragraph 4.5; and

4.2.3. Process travel vouchers promptly to assure timely payment to civilian employees or Service members or to recover any excess travel advances. DoD Components must establish internal policies and procedures to ensure travel vouchers are paid within 25 working days after the end of a trip or travel period.

Source: Department of Defense Financial Management Regulation 7000.14-R, vol. 9, ch. 5, *Temporary Duty Travel (TDY) and Travel Advances* (January 2024), ch. 6, *Permanent Duty Travel* (May 2023), and ch. 8, *Processing Travel Claims* (April 2024). | GAO-25-107062

Officials in the Office of the Under Secretary of Defense (Comptroller) told us that the Comptroller’s office assumes full responsibility for the contents of the *Financial Management Regulation*. However, the DOD Comptroller has not clarified in the *Financial Management Regulation* inconsistencies about pay timelines, including for advance payments. They told us that they are aware that some language in the *Financial Management Regulation* is unclear and inconsistent. They noted that separate organizations draft text for different chapters of the regulation, which can result in some inconsistency in wording and policy across chapters.

DOD’s Enterprise Risk Management and Risk Management and Internal Control Program incorporates GAO’s *Standards for Internal Control in the Federal Government*. Those standards provide that managers should use quality information to achieve the entity’s objectives and implement control activities through policies.³⁰

Without revisions to the *Financial Management Regulation* guidance to eliminate inconsistencies, including for advance payments, and rectify unclear language on PCS reimbursement timelines, the military services are hindered in their ability to effectively interpret and implement the policy in accordance with department-wide guidance. This, in turn, hinders their ability to fully monitor and provide timely PCS reimbursements to service members.

Army and Marine Corps Regularly Monitor PCS Reimbursements but Do Not Have a Central Authority to Address Delays

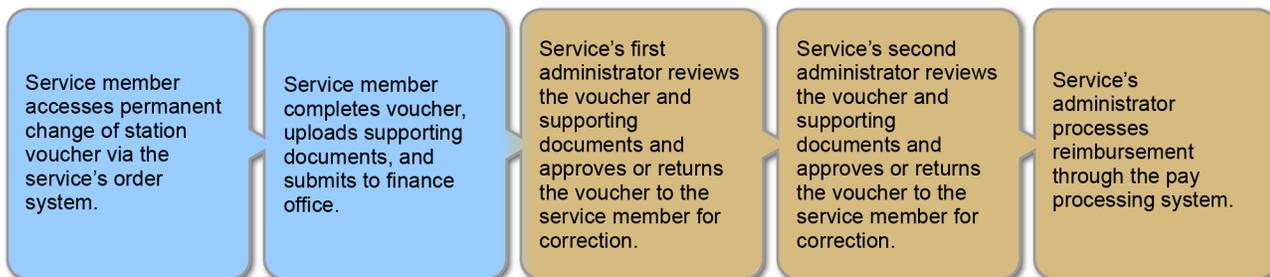
The Army and Marine Corps, the two services we selected for in-depth analysis, both regularly monitor PCS reimbursements through multistep reviews and post payment audits. Despite these monitoring efforts, instances of delays persist. The percentage of PCS vouchers reimbursed beyond the established time frames from fiscal year 2021 through fiscal year 2023 averaged 7 percent for the Army (40,798 reimbursements) and almost 10 percent for the Marine Corps (17,134 reimbursements). However, the Army and Marine Corps lack a central authority to monitor and address reimbursement delays in a timely manner.

³⁰[GAO-14-704G](#).

The Army and Marine Corps Regularly Monitor PCS Reimbursements by Conducting Multistep Reviews and Post Payment Audits

The Army, or DFAS on its behalf, and the Marine Corps take steps to regularly monitor service members' travel vouchers to ensure that PCS reimbursements happen accurately and on time. Each service works through layers of reviews and approvals before disbursing reimbursements. Administrators of those reviews must ensure, among other things, that vouchers are properly prepared. For example, service members must attach receipts exceeding \$75 to each voucher and a copy of their official travel orders. Each travel order must contain, among other things, an authorizing official's signature approving the amount of reimbursement requested.³¹ Figure 4 depicts the Army and Marine Corps processes, which include two layers of administrative reviews to ensure accuracy before their respective finance offices issue PCS reimbursements.

Figure 4: Permanent Change of Station Travel Voucher Reimbursement Process for Army and Marine Corps



Source: GAO analysis of Army and Marine Corps information. | GAO-25-107062

Timeliness requirements are built into the PCS reimbursement process. Upon receipt of each properly completed voucher, administrators are required, according to the *Financial Management Regulation*, to ensure reimbursement within 30 calendar days for the Army; and within 10 business days, according to Marine Corps policy.³² Marine Corps officials told us that they shortened their timeline because they have no good reason to delay PCS reimbursements beyond 10 business days. They

³¹DOD 7000.14-R, vol. 9, ch. 8.

³²Specifically, in the case of the Army, the *Financial Management Regulation* provides that, if the disbursing office does not pay a travel claim within 30 calendar days after it is received by the office with responsibility to approve the claim, that office may be required to pay a late payment fee. DOD 7000.14-R, *Financial Management Regulation*, vol. 9, ch. 8, *Processing Travel Claims* (April 2024). The Marine Corps policy states that the Marine Corps must process vouchers within 10-business days. Marine Corps Finance Policy Manual, Volume 2: Travel Policies, Chapter 3: *Permanent Duty Travel (PDT)* (October 2024). Marine Corps officials told us that processing includes issuing PCS reimbursements to service members.

also told us that they have been considering shortening their official timeline further, to 5 business days.

Army, or DFAS on its behalf, and Marine Corps officials also take additional steps to ensure PCS reimbursement timeliness. For example, they:

- provide information on PCS reimbursement processing to help ensure that service members have the resources they need to fully understand the process, and
- run status reports to track where vouchers are in the reimbursement process. For example, DFAS finance officials told us they run a daily report that highlights the time it takes them to process PCS vouchers. They also told us that they review and continually monitor all vouchers that remain unreimbursed or not approved for 10 or more days. Additionally, Marine Corps finance officials told us they identify problems with processing vouchers for PCS reimbursement delays through several different reports. For example, they rely on unsettled voucher reports to track which vouchers have been submitted by the service member but have not yet been approved by an administrative official.

Army, DFAS, and Marine Corps finance officials also review PCS reimbursement timeliness metrics and conduct post payment audits for accuracy of reimbursements. Specifically:

- The *Financial Management Regulation* and DFAS documents call for an audit of (1) each PCS voucher completed by examiners that are new to their job; (2) every voucher request exceeding \$2,500; and (3) a random selection of 1 percent of all other vouchers that fall below \$2,500.³³ DFAS finance officials told us they create and publish two timeliness reports for Army officials. The first, produced weekly, shows the time between when the Army Military Payment Office sends vouchers to DFAS for PCS processing and DFAS subsequently reimburses service members. The second, produced monthly according to DFAS finance officials, compares the time DFAS spends processing vouchers electronically to the time DFAS spends processing vouchers submitted through other means (such as hard copies submitted electronically via email

³³DFAS officials rely on volume 5, chapter 5 of the *Financial Management Regulation*, along with several DFAS documents. DOD 7000.14-R, vol. 5, ch. 5, *Certifying Officers, Departmental Accountable Officials, And Review Officials* (October 2024).

attachments). DFAS finance officials told us that neither report includes the number or percentage of PCS reimbursements delayed to service members.

- Marine Corps finance officials told us that they produce annual reports on selected locations to update Marine Corps leadership on its PCS voucher processing and payment status. They also told us these reports address whether PCS travel claims were paid accurately and on time.

Over the Period Examined, an Average of 7 Percent of Army and Almost 10 Percent of Marine Corps PCS Vouchers Were Delayed

We examined Army and Marine Corps data from fiscal years 2021 through 2023 on PCS voucher reimbursements using the time frames established in guidance: 30 calendar days for the Army following the *Financial Management Regulation* and 10 business days for the Marine Corps following its own more restrictive reimbursement timelines.

Army Number of PCS Voucher Reimbursements and Dollar Amounts

Of the total 586,417 Army voucher reimbursements we analyzed from fiscal years 2021 through 2023, our analysis showed that 7.0 percent (or 40,798) were reimbursed more than 30 calendar days after receiving the approved vouchers, which are considered delayed under the *Financial Management Regulation* time frame. Table 1 provides additional details on the number of PCS reimbursements.

Table 1: Army Permanent Change of Station (PCS) Travel Vouchers Reimbursed, by Number and Percent, Following a 30-Calendar Day Timeline, Fiscal Years 2021-2023

Fiscal year	Reimbursed in 30 or fewer calendar days		Reimbursed in 31 or more calendar days		Reimbursed total	
	Number	Percent	Number	Percent	Number	Percent
2021	212,643	91.6	19,583	8.4	232,226	100.0
2022	187,436	94.5	10,938	5.5	198,374	100.0
2023	145,540	93.4	10,277	6.6	155,817	100.0
2021-2023	545,619	93.0	40,798	7.0	586,417	100.0

Source: GAO analysis of Army workforce data. | GAO-25-107062

Note: The data reflect PCS reimbursements for active-duty service members from the Integrated Automated Travel System. It excludes data related to sensitive or classified PCS moves. Percentages may not total 100 due to rounding.

Of the 40,798 PCS reimbursements our analysis identified as delayed, we also found that DFAS paid 96.5 percent (or 39,353 reimbursements) in 31 to 60 calendar days (or an average of 38-calendar days) from fiscal year 2021 through fiscal year 2023.³⁴ The costs of moving typically amount to several thousand dollars. See appendix II for additional details.

The 586,417 PCS reimbursements that DFAS paid on behalf of the Army from fiscal years 2021 through 2023 totaled over \$1.9 billion to service members. Of that amount, DFAS reimbursed 7.2 percent (\$138.7 million) more than 30 calendar days after receiving the approved voucher. Table 2 provides additional details regarding amounts that DFAS reimbursed on the Army's behalf.

Table 2: Army Permanent Change of Station (PCS) Travel Vouchers Reimbursed, by Dollar Amounts Owed and Percent, Following a 30-Calendar Day Timeline, Fiscal Years 2021-2023

Fiscal Year	Reimbursed in 30 or fewer calendar days		Reimbursed in 31 or more calendar days		Reimbursed total	
	Dollars (in millions)	Percent	Dollars (in millions)	Percent	Dollars (in millions)	Percent
2021	631.0	94.1	40.5	6.0	671.5	100.0
2022	614.5	92.4	50.7	7.6	665.2	100.0
2023	548.3	92.0	47.5	8.0	595.8	100.0
2021-2023	1,793.8	92.8	138.7	7.2	1,932.4	100.0

Source: GAO analysis of Army workforce data. | GAO-25-107062

Note: The data reflect PCS reimbursements for active-duty service members from the Integrated Automated Travel System. It excludes data related to sensitive or classified PCS moves. Percentages may not total 100 due to rounding.

Our analysis showed that the monetary amount of the Army's delayed PCS reimbursements ranged from almost \$41 million in fiscal year 2021 to almost \$51 million in fiscal year 2022. The average amount delayed totaled about \$3,399 from fiscal year 2021 through fiscal year 2023. In one 2023 example, a soldier had not received reimbursement for 62 calendar days for a PCS voucher totaling over \$7,000. Appendix II provides additional details pertaining to various time intervals in which DFAS paid PCS reimbursements to service members from fiscal year 2021 through fiscal year 2023.

³⁴A small percent of the transactions provided by DFAS that make up our averages (i.e., less than 1 percent) may contain inaccurate dates that could affect these averages.

Marine Corps Number of PCS Voucher Reimbursements and Dollar Amounts

Of the total 176,216 Marine Corps voucher reimbursements we analyzed from fiscal years 2021 through 2023, our analysis showed that 9.7 percent (17,134) were reimbursed more than 10 business days after receiving them, which officials noted they consider delayed by Marine Corps policy. Our analysis also showed that delayed reimbursements were 0.6 percent (1,118 vouchers) under the *Financial Management Regulation* timeline of 30 calendar days. Tables 3 and 4 provide additional details of the number of PCS transactions following the 10-business day and 30-calendar day timeline, respectively, by fiscal year.

Table 3: Marine Corps Permanent Change of Station (PCS) Travel Vouchers Reimbursed, by Number and Percent, Following a 10-Business Day Timeline, Fiscal Years 2021-2023

Fiscal year	Reimbursed in 10 or fewer business days		Reimbursed in 11 or more business days		Reimbursed total	
	Number	Percent	Number	Percent	Number	Percent
2021	50,402	97.2	1,448	2.8	51,850	100.0
2022	55,503	89.3	6,655	10.7	62,158	100.0
2023	53,177	85.5	9,031	14.5	62,208	100.0
2021-2023	159,082	90.3	17,134	9.7	176,216	100.0

Source: GAO analysis of Marine Corps workforce data. | GAO-25-107062

Note: The data reflect PCS reimbursements to active-duty service members from the Integrated Automated Travel System and the Marine Corps Total Force System, collectively. It excludes data related to sensitive or classified PCS moves, as well as transactions processed in the Marine Corps Total Force System and reimbursed between October 1 and December 31, 2020, as some files were overwritten during system development. Percentages may not total 100 due to rounding.

Table 4: Marine Corps Permanent Change of Station (PCS) Travel Vouchers Reimbursed, by Number and Percent, Following a 30-Calendar Day Timeline, Fiscal Years 2021-2023

Fiscal year	Reimbursed in 30 or fewer calendar days		Reimbursed in 31 or more calendar days		Reimbursed total	
	Number	Percent	Number	Percent	Number	Percent
2021	51,714	99.7	136	0.3	51,850	100.0
2022	61,947	99.7	211	0.3	62,158	100.0
2023	61,437	98.8	771	1.2	62,208	100.0
2021-2023	175,098	99.4	1,118	0.6	176,216	100.0

Source: GAO analysis of Marine Corps workforce data. | GAO-25-107062

Note: The data reflect PCS reimbursements to active-duty service members from the Integrated Automated Travel System and the Marine Corps Total Force System, collectively. It excludes data related to sensitive or classified PCS moves, as well as transactions processed in the Marine Corps Total Force System and reimbursed between October 1 and December 31, 2020, as some files were overwritten during system development. Percentages may not total 100 due to rounding.

Of the 17,134 PCS reimbursements our analysis identified as delayed following the 10-business day timeline, we found that the Marine Corps paid most of these to service members within 11 to 20 business days (or in an average of 14-business days) after receiving properly prepared vouchers, from fiscal year 2021 through fiscal year 2023. Far fewer delayed reimbursements were paid 21 days or later.

The 176,216 PCS reimbursements that the Marine Corps paid to service members in that same 3-year period totaled about \$409 million. Of that amount, the Marine Corps reimbursed 11.5 percent (\$47.0 million) more than 10 business days after receiving them. If the Marine Corps had followed the same 30-calendar day pay timeliness policy that the Army follows (the timeline in the *Financial Management Regulation*), then our analysis would have shown that the Marine Corps reimbursed 1.4 percent (almost \$6 million) beyond 30 calendar days. Tables 5 and 6 provide additional details regarding PCS dollar amounts reimbursed following the 10-business day and 30-calendar day timelines, respectively, by fiscal year.

Table 5: Marine Corps Permanent Change of Station (PCS) Travel Vouchers Reimbursed, by Dollar Amounts Owed and Percent, Following a 10-Business Day Timeline, Fiscal Years 2021-2023

Fiscal year	Reimbursed in 10 or fewer business days		Reimbursed in 11 or more business days		Reimbursed total	
	Dollars (in millions)	Percent	Dollars (in millions)	Percent	Dollars (in millions)	Percent
2021	119.7	96.8	4.0	3.2	123.7	100.0
2022	120.2	86.5	18.7	13.5	138.9	100.0
2023	122.0	83.4	24.3	16.6	146.2	100.0
2021-2023	361.9	88.5	47.0	11.5	408.8	100.0

Source: GAO analysis of Marine Corps workforce data. | GAO-25-107062

Note: The data reflect PCS reimbursements to active-duty service members from the Integrated Automated Travel System and the Marine Corps Total Force System, collectively. It excludes data related to sensitive or classified PCS moves, as well as transactions processed in the Marine Corps Total Force System and reimbursed between October 1 and December 31, 2020, as some files were overwritten during system development. Percentages may not total 100 due to rounding.

Table 6: Marine Corps Permanent Change of Station (PCS) Travel Vouchers Reimbursed, by Dollar Amounts Owed and Percent, Following a 30-Calendar Day Timeline, Fiscal Years 2021-2023

Fiscal Year	Reimbursed in 30 or fewer calendar days		Reimbursed in 31 or more calendar days		Reimbursed total	
	Dollars (in millions)	Percent	Dollars (in millions)	Percent	Dollars (in millions)	Percent
2021	123.1	99.6	0.5	0.4	123.7	100.0
2022	138.2	99.5	0.8	0.5	138.9	100.0
2023	141.8	96.9	4.5	3.1	146.2	100.0
2021-2023	403.1	98.6	5.7	1.4	408.8	100.0

Source: GAO analysis of Marine Corps workforce data. | GAO-25-107062

Note: The data reflect PCS reimbursements to active-duty service members from the Integrated Automated Travel System and the Marine Corps Total Force System, collectively. It excludes data related to sensitive or classified PCS moves, as well as transactions processed in the Marine Corps Total Force System and reimbursed between October 1 and December 31, 2020, as some files were overwritten during system development. Percentages may not total 100 due to rounding.

Our analysis also showed that, when following the 10-business day timeline, the monetary amount of the Marine Corp’s delayed PCS reimbursements increased annually from almost \$4 million in fiscal year 2021, to over \$24 million in fiscal year 2023. In one 2023 example, a Marine Corps major had not received reimbursement for a PCS voucher for 34-business days that totaled over \$31,000. Appendix II provides additional details pertaining to various time intervals for which the Marine Corps paid PCS reimbursements to service members from fiscal year 2021 through fiscal year 2023.

The Army and Marine Corps Do Not Have Points of Central Authority to Address PCS Reimbursement Delays

The Army and the Marine Corps rely on separate offices that have functions related to PCS reimbursements. However, these services lack a central authority to monitor and address reimbursement delays in a timely manner. Specifically, officials from each of these services told us that the:

- **Army relies on two offices to issue PCS travel orders and reimbursements.** Army personnel officials who issue official PCS travel orders told us they are in a separate office from DFAS finance officials who ensure timely PCS reimbursements to service members. They also told us that when DFAS receives vouchers with attached travel orders that have errors (e.g., duplicate travel claims or missing authorizing official signatures), their office must rely on the personnel office to address these errors before they can process PCS reimbursements for distribution. Travel orders, according to DFAS finance officials, are a personnel function for which they have no oversight or managerial authority. DFAS finance officials told us that they have

been trying to resolve the issue of travel orders containing errors for over a year. However, they told us that have been unable to identify enduring solutions that would limit duplicate travel orders and prevent time-consuming manual corrections that lead to reimbursement delays.

- **Marine Corps relies on two offices for PCS processing and reimbursements.** The Marine Corps' Installation and Logistics office—the office that processes PCS reimbursements related to the movement of household goods that service members elect to arrange on their own behalf (also known as a personally procured or do-it yourself moves)—is located separately from the office that processes all other PCS reimbursements (Personnel and Readiness), according to Marine Corps finance officials.³⁵

According to finance officials from both offices, Installation and Logistics has been unaware of the Marine Corps' more restrictive PCS reimbursement timeliness requirement of 10 business days, which contributed to delayed PCS reimbursements from fiscal year 2021 through fiscal year 2023. Thus, Installation and Logistics officials told us they have been processing PCS reimbursements to service members for the movement of household goods following the 30-calendar day guidance (instead of the 10-business day guidance required by the Marine Corps).³⁶ Installation and Logistics finance officials told us that it takes them much longer to process reimbursements for the movement of household goods than 10 business days and that they were not asked for input prior to the Marine Corps implementing the more restrictive policy. Officials from both offices agreed that they have not yet established an enduring solution that will help both services ensure timely PCS reimbursements to its service members.

Staffing shortages and the higher-than-usual volume of vouchers submitted for payment during the summer months (an annual period

³⁵Installation and Logistics is in a separate command from Personnel and Readiness, the office that handles other PCS reimbursement processing functions, according to Marine Corps finance officials. They told us that the two offices have different roles and therefore generally do not work together as a matter of routine.

³⁶Installation and Logistics does not process PCS reimbursements in the Integrated Personnel Payment System. Instead, it processes the movement of household goods using the Marine Corps Total Force System.

known as the summer surge, according to DOD officials) compounded the problems, according to our analysis. DFAS and Marine Corps finance officials also told us that these issues affected their ability to ensure timely PCS reimbursements to service members. Specifically:

- **Staffing shortages pose ongoing challenges.** According to DFAS and Marine Corps finance officials, staffing shortages are common because the PCS process is complicated, resulting in steep learning curves for administrators responsible for processing reimbursements.³⁷ Once administrators become experienced, according to these finance officials, they often move on to other more high paying positions. DFAS finance officials told us that they have offered overtime for staff to meet workload demands to remedy delayed PCS reimbursements for Army service members; however, this has not solved the issue.

Marine Corps' Installation and Logistics finance officials told us that since the COVID-19 pandemic, staffing shortages cut their PCS payment processing support by half (i.e., from eight to four administrators). They also told us that, since then, they lost additional support they usually obtained annually from the Marine Corps' Personnel and Readiness office each year, which exacerbated the PCS reimbursement delays related to the movement of household goods. Personnel and Readiness finance officials told us they had declined to help Installation and Logistics officials because they have done so for many years but are also short staffed, and because the movement of household goods is beyond their area of responsibility.

- **Summer surge affects volume of vouchers and reimbursement timeliness.** DFAS and Marine Corps officials told us they process the largest number of PCS vouchers in any given year during the summer surge. DFAS officials told us they processed about 27,000 Army PCS vouchers in July 2023, compared with 15,000 in February 2023. DFAS finance officials stated that while the summer surge is valuable because it helps service members move their families during more ideal times

³⁷According to DFAS officials, DFAS processes vouchers on behalf of the Army because the Army employs the largest military service population, representing a substantial amount of DOD's overall military population. A high volume of vouchers annually makes it challenging for Army officials to process PCS reimbursements quickly without DFAS assistance, according to DFAS officials, and can exacerbate other problems much more rapidly than might be the case for military services with fewer members.

(e.g., when service members' children generally are on summer vacations), it is also harder for them to make PCS reimbursements in a timely manner given the sheer number of Army PCS moves, especially when travel order errors and staffing issues linger. Marine Corps officials told us they support the rationale behind military services agreeing to move service members and their families when it is most advantageous to the service member. However, according to these officials, the higher than usual volume increases the chances of delayed PCS reimbursements.

Army, DFAS, and Marine Corps officials are required by DOD's *Financial Management Regulation* to ensure prompt and accurate PCS reimbursements to service members.³⁸ Additionally, *Standards for Internal Control in the Federal Government* (incorporated into DOD's internal control processes) state that internal control, among other things, is a dynamic process that must be adapted continually to the risks and changes an entity faces.³⁹ As such, managers should (1) establish and operate activities to monitor the internal control system and evaluate results, and (2) remediate identified internal control deficiencies on a timely basis.

Army and Marine Corps officials told us that they regularly attempt to rectify challenges but cannot remedy everything associated with PCS reimbursement processing because some of the challenges are outside of their offices' authority or control. In line with these views, we found that neither of these two services have a central authority with visibility over the resources and demands of every office that is responsible for some PCS payment function. As a result, neither military service can expeditiously remediate all payment timeliness delays by, for example, reallocating resources as needed to address staffing needs or ensuring offices with different responsibilities are able to address the causes of delays. DFAS, Army, and Marine Corps officials agreed that a single entity within each service would help to ensure each service is aligned in its efforts to address the issues leading to delayed PCS reimbursements to service members.

³⁸Travel and Transportation Reform Act of 1998, Pub. L. No. 105-264, 112 Stat. 2350-57 (1998). DOD 7000.14-R, vol. 9, ch. 5, 6 & 8. Marine Corps, *Finance Policy Manual*, Volume 2: Travel Policies, Chapter 3: *Permanent Duty Travel (PDT)* (October 2024).

³⁹[GAO-14-704G](#).

Establishing a single entity within each service that can monitor and address ongoing PCS reimbursement timeliness problems (including those related to differing offices with PCS reimbursement functions, staffing shortages, and a higher than usual volume of vouchers to process during the summer months) would improve the ability of Army and Marine Corps finance officials to effectively monitor and expeditiously address all PCS reimbursement delays. Such action can help limit the amount of time that service members carry the burden of moving costs as they move to meet the needs of the military.

Conclusions

In fiscal year 2024, more than 400,000 service members received PCS travel orders and moved to a new duty station. After moving, these military service members submit PCS travel vouchers for the reimbursement of moving expenses. DOD's guidance—the *Financial Management Regulation*—establishes timelines for when military services are expected to reimburse service members but has inconsistencies and is unclear, making it difficult to interpret. As such, the military services face challenges in understanding and enforcing the timelines for reimbursements.

From fiscal year 2021 through fiscal year 2023, the Army reimbursed 7 percent, and the Marine Corps reimbursed about 10 percent of PCS vouchers beyond time frames established in guidance. These services have an opportunity to reduce instances of delays by establishing central authorities to monitor and remediate problems in processing reimbursements so that service members do not carry the burden of moving costs beyond a reasonable period.

Recommendations for Executive Action

We are making a total of three recommendations, one each to DOD, the Army, and the Navy. Specifically:

The Secretary of Defense should ensure that the Under Secretary of Defense (Comptroller) clarifies *Financial Management Regulation* guidance by eliminating inconsistencies and rectifying unclear language on PCS reimbursement timelines, including but not limited to those where advance payments are involved. (Recommendation 1)

The Secretary of the Army should establish a single entity with authority and responsibility to (1) conduct ongoing monitoring to ensure every component with responsibilities related to PCS reimbursement timeliness is accountable and (2) remediate reimbursement timeliness problems expeditiously. (Recommendation 2)

The Secretary of the Navy should ensure that the Commandant of the Marine Corps establishes a single entity in the Marine Corps with authority and responsibility to (1) conduct ongoing monitoring to ensure every component with responsibilities related to PCS reimbursement timeliness is accountable and (2) remediate reimbursement timeliness problems expeditiously. (Recommendation 3)

Agency Comments and Our Evaluation

We provided a draft of this report to DOD for review and comment. In its written comments, reproduced in appendix III, DOD concurred with two of our three recommendations and provided details on its plans to address them.

DOD did not concur with our third recommendation. In its response, it stated that the Marine Corps' existing decentralized framework effectively manages the PCS reimbursement process. Further, the department stated that while the Marine Corps proactively self-imposed an internal benchmark of paying vouchers within 10-business days, the primary benchmark remains the 30-calendar day standard in the *Financial Management Regulation*. DOD stated that the Marine Corps met that standard more than 98 percent the time and cited this as evidence that its current model is effective and sustainable. DOD also stated that establishing a centralized oversight entity would add unnecessary bureaucratic layers and could weaken the specialized functions of its administrators and financial management.

We agree that the Marine Corps was proactive by self-imposing a 10-business day standard for PCS reimbursement timeliness and that its success rate under the 30-calendar day standard established in the *Financial Management Regulations* is better in comparison to its success rate under the 10-business day standard. However, our report describes challenges that arise from a decentralized process, including the absence of a single authority to oversee expeditious resolutions in the event of reimbursement delays. For example, Marine Corps Personnel and Readiness finance officials told us they had recently declined to help Marine Corps Installation and Logistics officials process PCS reimbursements for the movement of household goods because they are short staffed and because the movement of household goods is beyond their area of responsibility. Additionally, Installation and Logistics officials told us they were unaware of the Marine Corps' more restrictive PCS reimbursement timeliness standard of 10-business days, further contributing to some delayed reimbursements. Officials from both offices also told us that they regularly attempt to rectify challenges but cannot remedy everything, especially when those challenges are outside of their

offices' authority or control. As a result, they agreed that by establishing a single entity with authority to reallocate resources as needed to address staffing needs and ensure coordination across offices with different responsibilities, the Marine Corps will be better positioned to address the causes of delays and reduce such delays in the future.

Further, the Marine Corps' 10-business day target recognizes the importance of ensuring that Marines not carry the burden of moving costs beyond a reasonable time frame. Yet, officials from both offices agreed that they have not yet established an enduring, coordinated solution that will help ensure the timely reimbursement of PCS costs to all Marines within the time frame established by the Marine Corps. We therefore continue to believe our recommendation is warranted.

We are sending copies of this report to the appropriate congressional committees, the Secretaries of Defense, Army, Navy, and Air Force, and the Commandant of the Marine Corps. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at agarwalr@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.

//SIGNED//

Rashmi Agarwal
Acting Director, Defense Capabilities and Management

Appendix I: Objectives, Scope, and Methodology

This report assesses the extent to which (1) Department of Defense (DOD) has guidance on monitoring timelines for Permanent Change of Station (PCS) reimbursements and (2) selected services—the Army and Marine Corps—monitor and address delays in PCS reimbursements to service members.

Analysis of Regulations, Policies, Guidance, and Procedures

For the first objective, we analyzed DOD's guidance related to the monitoring of PCS reimbursements, as well as internal control procedures related to achieving objectives and using quality information. We interviewed officials from the DOD Comptroller's Office, Defense Finance and Accounting Service (DFAS), and the Defense Travel Management Office about PCS reimbursement processing policies and practices.¹ We also interviewed finance officials from the Army, Navy, Air Force and Space Force (hereafter Air/Space Force), and Marine Corps for the same purpose and to understand whether they were able to achieve their objectives with clear policies.² In consultation with these officials, we analyzed the following key sources:

- DOD's *Financial Management Regulation*;
- DOD's *Joint Travel Regulations*;
- the Travel and Transportation Reform Act of 1998;
- DOD's Enterprise Risk Management and Risk Management and Internal Control Program; and
- *Standards for Internal Control in the Federal Government*.³

¹The Defense Finance and Accounting Service (DFAS) standardizes, consolidates, and improves accounting and financial functions throughout the Department of Defense (DOD). It has a Mission Work Agreement with the Army to process its PCS reimbursements. The Defense Travel Management Office oversees travel for DOD, including the Per Diem Travel and Transportation Allowance Committee, which updates and publishes the *Joint Travel Regulations* (travel and transportation allowances of uniformed service members and DOD civilian travelers).

²Air and Space Force officials told us they work as a single entity when processing PCS payments. Thus, in this review, we combined them as well.

³DOD 7000.14-R, *Financial Management Regulation*; DOD, the *Joint Travel Regulations*, (Apr. 1, 2025); Travel and Transportation Reform Act of 1998, Pub. L. No. 105-264, (1998); DOD Instruction 5010.40 *DOD Enterprise Risk Management and Risk Management and Internal Control Program* (Dec. 11, 2024); and GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

We compared relevant documentation and processes with *Standards for Internal Control in the Federal Government*, including the principles that management should use quality information to achieve the entity's objectives, and implement control activities through policies.

For the second objective, we analyzed guidance and data related to PCS monitoring and reimbursements from the Army and the Marine Corps, as well as internal control standards relative to monitoring data and expeditiously addressing risks (we also reviewed Army and Marine Corps data on PCS reimbursements; see below for discussion of our data analysis). We selected these two military services based on various factors, including service size, availability of timely data, and reliability of data. See the data section that follows for additional details.

We also interviewed finance officials from DFAS, the Army, and the Marine Corps to understand (1) the extent to which each service monitors or is aware of PCS reimbursement delays, (2) the reasons for the delays, and (3) any problems associated with expeditiously addressing and remediating delays.⁴ In consultation with these officials, we analyzed the same five sources listed above. We did the same for relevant military service-level regulations and policies, including:

- Army Regulation 11-2, *Risk Management and Internal Control Program*;
- Army Regulation 637-1, *Military Personnel Pay, Allowances, and Incentives: Army Compensation and Entitlements Policy*, and
- Marine Corps, *Finance Policy Manual*, Volume 2: Travel Policies.⁵

We compared that documentation with *Standards for Internal Control in the Federal Government*, including the principles that internal control, among other things, is a dynamic process that must be adapted continually to the risks and changes an entity faces.⁶ As such, managers should (1) establish and operate ongoing activities to monitor the internal

⁴DFAS primarily processes PCS payments for the Army but also assists other military services with PCS pay processing to a lesser extent.

⁵Army Regulation 11-2, *Risk Management and Internal Control Program* (July 16, 2024); Army Regulation 637-1, *Military Personnel Pay, Allowances, and Incentives: Army Compensation and Entitlements Policy* (July 26, 2021); and Marine Corps, *Finance Policy Manual*, Volume 2: Travel Policies (October 2024).

⁶[GAO-14-704G](#).

control system and evaluate results and (2) remediate identified internal control deficiencies on a timely basis.

Analysis of Army and Marine Corps Data

For the second objective, we selected two military services—the Army and the Marine Corps—for in-depth analysis based on the following factors: (1) the military service with the largest number of service members, (2) the military service with the smallest number of service members, (3) the extent to which PCS data was readily available and each military service could provide it within a specified time period, and (4) the extent to which the data was sufficiently reliable for our reporting purposes. We selected the largest and smallest services based on military population size to allow for the possibility that differences in PCS reimbursement delays could result from the disparity in the number of PCS moves.

Our analysis determined that in 2022, the Army had the largest service member population followed by the Navy, Air/Space Force, and the Marine Corps. DFAS—on behalf of the Army (with the largest service member population)—provided PCS data it pulled from the Integrated Automated Travel System within our specified time frame. The Marine Corps (with the smallest service member population) also provided a compilation of data that it merged into two databases, the Integrated Automated Travel System and the Marine Corps Total Force Systems (their newer system that is still in development) within the specified time frame. The data from both services covered all PCS vouchers beginning in fiscal year 2021 through the end of fiscal year 2023, the latest complete year of data available at the time of our data request and review.

To test the reliability of the Army and Marine Corps data, we reviewed documentation associated with its collection, structure, and data elements and conducted electronic testing of the data for completeness and consistency. We also interviewed DFAS, Army, and Marine Corps officials who were knowledgeable about the management and uses of the data. We determined these data were sufficiently reliable for the purposes of reporting delays in PCS reimbursements and concluded that the Army and the Marine Corps would be our selected services.

The data from the Army and Marine Corps represents the total universe of PCS transactions for active-duty service members traveling on all but sensitive or classified travel orders and that were reimbursed within this 3-year time frame. However, it excludes data processed in the Marine

Corps Total Force System and reimbursed between October 1 and December 31, 2020, as some files were overwritten during system development. The factors that we evaluated included, among others, the dates each service's travel unit received the properly prepared travel vouchers as well as the dates for which DFAS, Army, or Marine Corps administrators processed and reimbursed service members on each voucher.

Using the timelines each service follows—30 calendar days for the Army and 10 business days for the Marine Corps—we analyzed the extent to which PCS reimbursements were delayed for each military service. We also reported on delayed PCS reimbursements for the Marine Corps using *Financial Management Regulation* timelines, the same 30-calendar day policy that the Army follows.

We conducted this performance audit from September 2023 to July 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Army and Marine Corps PCS Reimbursements in Fiscal Year 2021 Through Fiscal Year 2023

We analyzed the time it took selected services—the Army and the Marine Corps—to pay Permanent Change of Station (PCS) reimbursements to service members in fiscal year 2021 through fiscal year 2023. To do so, we categorized our analysis into four distinct categories.

For the Army, our categories included:

- 30 or fewer calendar days (the Army’s definition of a timely PCS payment), as well as
- 31-60 calendar days,
- 61-90 calendar days, and
- 91 or more calendar days (the latter three of which our analysis determined as delayed reimbursements).¹

For the Marine Corps, our categories included:

- 10 or fewer business days (the Marine Corp’s definition of a timely PCS payment),
- 11-20 business days,
- 21-30 business days, and
- 31 or more business days (the latter three of which our analysis determined as delayed reimbursements), as well as
- the same categories we established for the Army data, which apply the 30-calendar day *Financial Management Regulation* timeline.²

Our analysis of data for the Army and the Marine Corps, as depicted in tables 7-12 show that, when reimbursements were delayed, both military services paid the bulk of these reimbursements in the shortest delayed time frame (31-60 calendar days for the Army; and 11-20 business days

¹Department of Defense 7000.14-R, *Financial Management Regulation*, vol. 9, ch. 8, *Processing Travel Claims* (April 2024).

²Marine Corps, *Finance Policy Manual*, Volume 2: Travel Policies (October 2024). This policy states that the Marine Corps must process vouchers within 10-business days. Marine Corps officials told us that processing includes issuing PCS payments to service members.

Appendix II: Army and Marine Corps PCS Reimbursements in Fiscal Year 2021 Through Fiscal Year 2023

or, if applying the *Financial Management Regulation* timeline, between 31-60 calendar days for the Marine Corps).³

Table 7: Army Permanent Change of Station (PCS) Travel Vouchers Reimbursed, by Number and Percent in 30-Calendar Day Intervals, Fiscal Years 2021-2023

Fiscal year	Reimbursed in 30 or fewer calendar days		Reimbursed in 31-60 calendar days		Reimbursed in 61-90 calendar days		Reimbursed in 91 or more calendar days		Reimbursed total	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
2021	212,643	91.6	18,188	7.8	1,378	0.6	17	0.0	232,226	100.0
2022	187,436	94.5	10,915	5.5	14	0.0	9	0.0	198,374	100.0
2023	145,540	93.4	10,250	6.6	24	0.0	3	0.0	155,817	100.0
2021-2023	545,619	93.0	39,353	6.7	1,416	0.2	29	0.0	586,417	100.0

Source: GAO analysis of Army workforce data. | GAO-25-107062

Note: The data reflect PCS reimbursements for active-duty service members from the Integrated Automated Travel System. It excludes data related to sensitive or classified PCS moves. Percentages may not total 100 due to rounding.

Table 8: Army Permanent Change of Station (PCS) Travel Vouchers Reimbursed, by Dollar Amounts Owed (in Millions) and Percent in 30-Calendar Day Intervals, Fiscal Years 2021-2023

Fiscal year	Reimbursed in 30 or fewer calendar days		Reimbursed in 31-60 calendar days		Reimbursed in 61-90 calendar days		Reimbursed in 91 or more calendar days		Reimbursed total	
	Dollars (in millions)	Percent	Dollars (in millions)	Percent	Dollars (in millions)	Percent	Dollars (in millions)	Percent	Dollars (in millions)	Percent
2021	631.0	94.0	37.8	5.6	2.6	0.4	0.0	0.0	671.5	100.0
2022	614.5	92.4	50.6	7.6	0.0	0.0	0.0	0.0	665.2	100.0
2023	548.3	92.0	47.4	8.0	0.1	0.0	0.0	0.0	595.8	100.0
2021-2023	1,793.8	92.8	135.8	7.0	280.0	0.1	0.9	0.0	1,932.4	100.0

Source: GAO analysis of Army workforce data. | GAO-25-107062

Note: The data reflect PCS reimbursements for active-duty service members from the Integrated Automated Travel System. It excludes data related to sensitive or classified PCS moves. Percentages may not total 100 due to rounding.

³The Defense Finance and Accounting Services processes the Army's PCS reimbursements. They use the Integrated Automated Travel System to do so. All data excludes information related to sensitive or classified PCS moves.

**Appendix II: Army and Marine Corps PCS
Reimbursements in Fiscal Year 2021 Through
Fiscal Year 2023**

Table 9: Marine Corps Permanent Change of Station (PCS) Travel Vouchers Reimbursed, by Number and Percent in 10-Business Day Intervals, Fiscal Years 2021-2023

Fiscal year	Reimbursed in 10 or fewer business days		Reimbursed in 11-20 business days		Reimbursed in 21-30 business days		Reimbursed in 31 or more business days		Reimbursed total	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
2021	50,402	97.2	1,341	2.6	75	0.1	32	0.1	51,850	100.0
2022	55,503	89.3	6,432	10.3	143	0.2	80	0.1	62,158	100.0
2023	53,177	85.5	8,296	13.3	551	0.9	184	0.3	62,208	100.0
2021-2023	159,082	90.3	16,069	9.1	769	0.4	296	0.2	176,216	100.0

Source: GAO analysis of Marine Corps workforce data. | GAO-25-107062

Note: The data reflect PCS reimbursements to active-duty service members from the Integrated Automated Travel System and the Marine Corps Total Force System, collectively. It excludes data related to sensitive or classified PCS moves, as well as transactions processed in the Marine Corps Total Force System and reimbursed between October 1 and December 31, 2020, as some files were overwritten during system development. Percentages may not total 100 due to rounding.

Table 10: Marine Corps Permanent Change of Station (PCS) Travel Vouchers Reimbursed, by Number and Percent in 30-Calendar Day Intervals, Fiscal Years 2021-2023

Fiscal year	Reimbursed in 30 or fewer calendar days		Reimbursed in 31-60 calendar days		Reimbursed in 61-90 calendar days		Reimbursed in 91 or more calendar days		Reimbursed total	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
2021	51,714	99.7	117	0.2	16	0.0	3	0.0	51,850	100.0
2022	61,947	99.7	165	0.3	30	0.0	16	0.0	62,158	100.0
2023	61,437	98.8	720	1.2	28	0.0	23	0.0	62,208	100.0
2021-2023	175,098	99.4	1,002	0.6	74	0.0	42	0.0	176,216	100.0

Source: GAO analysis of Marine Corps workforce data. | GAO-25-107062

Note: The data reflect PCS reimbursements to active-duty service members from the Integrated Automated Travel System and the Marine Corps Total Force System, collectively. It excludes data related to sensitive or classified PCS moves, as well as transactions processed in the Marine Corps Total Force System and reimbursed between October 1 and December 31, 2020, as some files were overwritten during system development. Percentages may not total 100 due to rounding.

Appendix II: Army and Marine Corps PCS Reimbursements in Fiscal Year 2021 Through Fiscal Year 2023

Table 11: Marine Corps Permanent Change of Station (PCS) Travel Vouchers Reimbursed, by Dollar Amounts Owed (in Millions) and Percent in 10-Business Day Intervals, Fiscal Years 2021-2023

Fiscal year	Reimbursed in 10 or fewer business days		Reimbursed in 11-20 business days		Reimbursed in 21-30 business days		Reimbursed in 31 or more business days		Reimbursed total	
	Dollars (in millions)	Percent	Dollars (in millions)	Percent	Dollars (in millions)	Percent	Dollars (in millions)	Percent	Dollars (in millions)	Percent
2021	119.7	96.8	3.6	2.9	0.2	0.2	0.1	0.1	123.7	100.0
2022	120.2	86.5	17.9	12.9	0.6	0.4	0.2	0.2	138.9	100.0
2023	122.0	83.4	19.9	13.6	3.3	2.2	1.0	0.7	146.2	100.0
2021-2023	361.9	88.5	41.4	10.1	4.1	1.0	1.4	0.3	408.8	100.0

Source: GAO analysis of Marine Corps workforce data. | GAO-25-107062

Note: The data reflect PCS reimbursements to active-duty service members from the Integrated Automated Travel System and the Marine Corps Total Force System, collectively. It excludes data related to sensitive or classified PCS moves, as well as transactions processed in the Marine Corps Total Force System and reimbursed between October 1 and December 31, 2020, as some files were overwritten during system development. Percentages may not total 100 due to rounding.

Table 12: Marine Corps Permanent Change of Station (PCS) Travel Vouchers Reimbursed, by Dollar Amounts Owed (in Millions) and Percent in 30-Calendar Day Intervals, Fiscal Years 2021-2023

Fiscal year	Reimbursed in 30 or fewer calendar days		Reimbursed in 31-60 calendar days		Reimbursed in 61-90 calendar days		Reimbursed in 91 or more calendar days		Reimbursed total	
	Dollars (in millions)	Percent	Dollars (in millions)	Percent	Dollars (in millions)	Percent	Dollars (in millions)	Percent	Dollars (in millions)	Percent
2021	123.1	99.6	0.4	0.4	0.1	0.0	0.0	0.0	123.7	100.0
2022	138.2	99.5	0.7	0.5	0.1	0.1	0.0	0.0	138.9	100.0
2023	141.8	96.9	4.3	2.9	0.1	0.1	0.1	0.1	146.2	100.0
2021-2023	403.1	98.6	5.4	1.3	0.2	0.1	0.1	0.0	408.8	100.0

Source: GAO analysis of Marine Corps workforce data. | GAO-25-107062

Note: The data reflect PCS reimbursements to active-duty service members from the Integrated Automated Travel System and the Marine Corps Total Force System, collectively. It excludes data related to sensitive or classified PCS moves, as well as transactions processed in the Marine Corps Total Force System and reimbursed between October 1 and December 31, 2020, as some files were overwritten during system development. Percentages may not total 100 due to rounding.

Appendix III: Comments from the Department of Defense



COMPTROLLER

OFFICE OF THE UNDER SECRETARY OF DEFENSE

1 100 DEFENSE PENTAGON
WASHINGTON, DC 20301-1100

Ms. Kristen Kociolek
Director, Financial Management and Assurance
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Kociolek:

This letter serves as the Department of Defense (DoD or Department) response to the Government Accountability Office (GAO) Draft Report GAO-25-107062SU, titled "Clearer Guidance Needed for Timely Reimbursements of Moving Expenses," dated May 9, 2025 (GAO Code 107062SU).

The Department acknowledges receipt of the draft report and concurs with recommendations 1 and 2. However, DoD does not agree with recommendation 3. Detailed responses to each recommendation are enclosed with this letter.

For any further inquiries or discussions regarding this response, please contact Ms. Fatimoh Ajadi, at 703-693-3357 or fatimoh.ajadi.civ@mail.mil.

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Date: 2025.06.18 17:06:33 -04'00'

Tina M. Pierce
Deputy Chief Financial Officer

Enclosure:
Summary of Recommendations and Responses

GAO DRAFT REPORT DATED MAY 9, 2025
GAO-25-107062SU (GAO CODE 10762SU)

"MILITARY COMPENSATION: CLEARER GUIDANCE NEEDED FOR TIMELY
REIMBURSEMENT OF MOVING EXPENSES"

DEPARTMENT OF DEFENSE RESPONSES
TO THE GAO RECOMMENDATIONS

RECOMMENDATION 1: The Government Accountability Office (GAO) recommends that the Secretary of Defense should ensure that the Under Secretary of Defense (Comptroller) clarifies *Financial Management Regulation* (FMR) guidance by eliminating inconsistencies and rectifying unclear language on Permanent Change of Station (PCS) reimbursement timelines, including but not limited to those where advance payments are involved.

DoD RESPONSE: Concur. The Under Secretary of Defense (Comptroller) will revise Volume 9, Chapter 5 of the FMR to ensure clearer and more consistent guidance on PCS reimbursement timelines. Specifically, the payment timeliness requirement will be updated from "paid within 25 working days after the end of a trip or travel period" to "paid within 30 calendar days after the claim is signed and dated as received by the reviewing official."

Upon final coordination and publication of the revised chapter, this recommendation will be considered fully addressed.

Estimated Completion Date (ECD): January 2026.

RECOMMENDATION 2: The GAO recommends that the Secretary of the Army should establish a single entity with authority and responsibility to (1) conduct ongoing monitoring to ensure every component with responsibilities related to PCS reimbursement timeliness is accountable and (2) remediate reimbursement timeliness problems expeditiously.

DoD RESPONSE: Concur. To address persistent challenges in PCS reimbursement timeliness, the Army will establish a centralized oversight entity under the leadership of the Deputy Chief of Staff, G-1 (Manpower & Reserve Affairs) (M&RA), with support from the U.S. Army Financial Management Command (USAFMCOM). This entity will be vested with the authority and responsibility to:

1. Conduct continuous monitoring of all components involved in the PCS reimbursement process to ensure accountability and alignment with established timelines and policies.
2. Identify, analyze, and resolve reimbursement delays in a timely and coordinated manner.

The M&RA/G-1 will oversee this initiative by leveraging its personnel policy and management expertise, while USAFMCOM will provide specialized support in financial systems, data

**Appendix III: Comments from the Department
of Defense**

analytics, and transaction processing. The collaborative approach will strengthen oversight, enhance transparency, improve service member experience, and support readiness by ensuring timely and accurate reimbursements.

RECOMMENDATION 3: The GAO recommends that the Secretary of the Navy should ensure that the Commandant of the Marine Corps establishes a single entity in the Marine Corps with authority and responsibility to (1) conduct ongoing monitoring to ensure every component with responsibilities related to PCS reimbursement timeliness is accountable and (2) remediate reimbursement timeliness problems expeditiously.

DoD RESPONSE: Non-concur. The United States Marine Corps (USMC) does not support this recommendation, as its existing decentralized framework effectively manages PCS reimbursement processes.

The Manpower Management Division (MM Div) completes its role in the PCS process once a Marine detaches from their initial unit and begins travel. Only in rare cases – less than 0.5% of annual PCS orders—does the MM Div's Manpower Information Branch (MMIB-3) need to coordinate with the Marine Corps Payroll Reconciliation Team (MCPRT) to adjust PCS lines of accounting. This collaboration is already highly responsive and effective.

MMIB-3 oversees a broad range of fiscal and entitlement responsibilities, with PCS accounting adjustments representing a minimal fraction of its workload. Reassigning MMIB-3 personnel to a centralized entity for PCS reimbursement oversight would disrupt critical operations without improving responsiveness.

Additionally, the Secretariat, acting as 01XX Occupational Field Specialists, does not support the recommendation. USMC already employs a robust, decentralized framework of Administrators and Financial Management Analysts who oversee PCS reimbursements. These professionals are fully accountable within their roles and have demonstrated strong coordination and efficiency.

USMC has proactively set an internal benchmark of paying vouchers within 10 days, exceeding the 30-day requirement established in the DoD Financial Management Regulation. While this self-imposed target reflects USMC's commitment to efficiency, the primary benchmark remains strict adherence to the 30-day regulatory standard, under which USMC has achieved a 98.6% success rate — evidence that its current model is both effective and sustainable.

Establishing a centralized oversight entity would add unnecessary bureaucratic layers and could weaken the specialized functions that Administrators and Financial Management Analysts currently manage. These professionals, embedded at multiple operational levels, already provide ongoing monitoring, timely intervention, and process improvements without the need for additional oversight.

In conclusion, while the USMC appreciates GAO's intent to enhance reimbursement timeliness, the existing governance structure — built on compliance, collaboration, and measurable

**Appendix III: Comments from the Department
of Defense**

performance—has proven effective. USMC remains committed to continuous improvement and stands by its decentralized accountability model.

Under the 30-day timeframe defined in the FMR, only 0.6% (1,118 vouchers) of Marine Corps reimbursements — totaling \$5.7 million — were delayed within the review period. USMC's internal 10-day target should not be used as an audit standard.

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

Rashmi Agarwal at AgarwalR@gao.gov.

Staff Acknowledgments

In addition to the contact named above, the following staff members made key contributions to this report: Simon Hirschfeld (Assistant Director), Tracey R. Kalinowski (Analyst in Charge), Tracy Abdo, Jesse Andrews, David Ballard, Alexandra Gonzalez, Kirsten Lauber, Ying (Sophia) Liu, Michael Shaughnessy, Yinghua Shi, Amelia Stastney, Theologos A. Voudouris, and Lillian Moyano Yob.

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