

# Questions and Answers: 2023 Clean School Bus (CSB) Grant Program

Funding Opportunity Number EPA-OAR-OTAQ-23-06

Friday, December 6, 2024

The following Questions and Answers have been compiled for the benefit of organizations considering applying for a grant under the above Notice of Funding Opportunity (NOFO).

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Please search \*New\* to quickly identify recently added questions in this document.

Please note that many questions are variations of each other so your exact question may not be listed; please look for similar questions.

### 1. Overview

1.1: What is the Clean School Bus Program? Is it different from DERA School Bus Rebates?

**Answer:** The Bipartisan Infrastructure Law (BIL) provides \$5 billion for the Clean School Bus (CSB) Program to replace existing school buses with clean and zero-emission (ZE) school buses. For each fiscal year between 2022 and 2026, \$500 million will be made available to fund zero-emission and clean school buses, and \$500 million will be made available to fund only zero-emission school buses. The first funding opportunity under the CSB Program was the 2022 Clean School Bus Rebates. The second funding opportunity, and the first CSB Grants funding opportunity, is the 2023 Clean School Bus Grants. Funds are subject to availability and total awards may be higher or lower than the anticipated funds offered.

The Clean School Bus Program is an entirely separate funding program from the Diesel Emissions Reduction Act (DERA) School Bus Rebates that EPA has offered in prior years. Date Posted: 6/5/2023

**1.2**: What is the difference between a grant and a rebate?

**Answer:** Both grants and rebates provide selectees with award funds for eligible bus and infrastructure up front; however, there are a few differences between these types of funding programs, including:

- 1) Application process: Rebate applications are generally quick and simple, whereas grants generally require longer, more detailed applications, which can support more complex projects.
- 2) Selection process: a random lottery process is used to select rebate recipients, whereas competitive grant programs select recipients based on evaluation of application materials.
- 3) Financial timing, documentation, and associated regulations: Grant recipients must follow all applicable requirements in 2 CFR 200.302, 2 CFR Part 1500 Subpart D, and 40 CFR Part 33; as required by 2 CFR 200.305(b), the recipient must draw funds from Automated Standard Application Payments (ASAP) only for the minimum amounts needed for actual and immediate cash requirements to pay employees, contractors, subrecipients or to satisfy other obligations for allowable costs under this assistance agreement. The timing and amounts of the drawdowns must be as close as administratively feasible to actual disbursements of EPA funds. Disbursement within 5 business days of drawdown will comply with this requirement and the recipient agrees to meet this standard when performing this award (please refer to the EPA General Terms and Conditions for more information).

EPA encourages applicants to consider which competition and award structure (grants or rebates) best suits their needs.

1.3: How is the 2023 CSB Grant Program different from the 2022 CSB Rebate Program?

**Answer:** The Bipartisan Infrastructure Law (BIL) provides \$5 billion for the Clean School Bus (CSB) Program to replace existing school buses with clean and zero-emission school buses. The first funding opportunity under the CSB Program was the 2022 Clean School Bus Rebates. The 2022 Rebate Program offered a quick way to aid school districts in fleet turnover and awarded up to \$965 million to approximately 400 school districts to help replace approximately 2,600 buses, almost ninety-five percent of which will be electric.

The 2023 CSB Grant Program will award approximately \$400 million in grants, subject to the availability of funds, the quantity and quality of applications received, and other applicable considerations. To address the unique needs and concerns of diverse grantees and encourage participation from a diverse set of stakeholders in the 2023 CSB Grant Program, the Notice of Funding Opportunity (NOFO) includes two separate sub-programs: 1) School District Sub-Program: for school district and Tribal applicants, targeting large single-fleet turnovers that may have been limited by the 25-bus maximum in the rebate program, and 2) Third-Party Sub-Program: for third-party applicants to serve school districts, particularly small, rural, Tribal, or low-income beneficiaries that may benefit from third-party technical support, grant administration and coordination (e.g., with utilities). Third-Party Sub-Program applicants must serve at least four school district beneficiaries to be eligible for funding under this program.

Date Posted: 6/5/2023

#### **1.4**: What are the eligible uses of funding?

**Answer:** CSB grants provide funding to eligible recipients so that they may replace existing school buses with clean and zero-emission models. Eligible activities include the replacement of existing internal-combustion engine (ICE) school buses with electric, propane, or compressed natural gas (CNG) school buses, as well as the purchase of electric vehicle supply equipment (EVSE) infrastructure and EVSE installations. Workforce training is also an eligible expense. See the Notice of Funding Opportunity (NOFO) for more information on eligible and ineligible uses of funding.

Date Posted: 6/5/2023

**1.5**: Why are there two sub-programs in the 2023 CSB Grant Program?

**Answer:** EPA would like to address the unique needs and concerns of diverse grantees and encourage participation from a diverse set of stakeholders in the 2023 CSB Grant Program.

Date Posted: 6/5/2023

**1.6**: Did the 2023 Omnibus funding bill amend the statutory language for the Clean School Bus program? Have the eligibility and program requirements been updated for the 2023 CSB Grant Program?

**Answer:** The <u>FY 2023 Consolidated Appropriations Act</u> (aka the Omnibus funding bill) included amendments to the CSB Program (p. 771 of 1,653) that make the following changes to the program:

- 1. Allow private bus fleets to apply directly for funding
- 2. More clearly allow the inclusion of charter schools as applicants

3. Allow an exception to the requirement that a bus serve the school district listed on the application for a minimum of 5 years, in the case that a private bus fleet contract expires and the bus continues to serve another similarly prioritized district

The 2023 CSB Grants funding opportunity incorporates these changes.

Date Posted: 6/5/2023

#### **1.7**: How many buses can be replaced?

**Answer:** Applicants applying through the School District Sub-Program (i.e., public school districts, public charter school districts, and Indian Tribes, Tribal Organizations, or Tribally-controlled schools) must replace 15 to 50 buses. Applicants applying through the Third-Party Sub-Program (i.e., nonprofit school transportation associations and eligible contractors, including Original Equipment Manufacturers (OEMs), dealers, school bus service providers, and private school bus fleets) must replace a total of 25 to 100 buses, that combined serve at least four school district beneficiaries. Applicants may only submit one application per EPA Region (but may submit applications to multiple Regions).

Date Posted: 6/5/2023

**1.8**: May an applicant apply for funding only to install or upgrade charging infrastructure?

Answer: No, standalone infrastructure projects are not eligible for funding under the 2023 CSB Grant Program; however, other sources of Federal, state, or local funding may be available for such projects. For example, see this <a href="Charging and Fueling Infrastructure Discretionary Grant">Charging and Fueling Infrastructure Discretionary Grant</a>
<a href="Program">Program</a> offered by the Federal Highway Administration. EPA is also partnering with The Joint Office of Energy and Transportation (JOET) and the National Renewable Laboratory to offer clean school bus technical assistance to school districts, including information and tools needed to successfully plan and deploy clean school buses and infrastructure. JOET may be able to help potential applicants identify other sources of federal, state, and local funding relevant to electric school bus projects. Please visit <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance">https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance</a> for more information. Potential applicants can also contact JOET technical assistance by emailing cleanschoolbusTA@nrel.gov.

Date Posted: 6/5/2023

**1.9**: Will applicants on the waitlist from past funding opportunities be automatically considered for this round of funding?

**Answer:** No, each program is a separate funding opportunity, and interested applicants must apply to each individual listing. Applicants that were put on a waitlist for past funding opportunities will need to re-submit a new application in accordance with the new funding opportunity guidelines.

Date Posted: 6/5/2023

**1.10**: Is a school district that applied for the 2022 Clean School Bus Rebates or that applies for the 2023 Clean School Bus Grant Program prohibited from applying for future Clean School Bus funding opportunities?

**Answer:** No. Applicants that applied for previous CSB funding opportunities or that apply for the 2023 CSB Grant Program are not prohibited from applying for future CSB funding opportunities.

**1.11**: How many grants will EPA fund under the 2023 CSB Grant Program?

**Answer:** EPA anticipates awarding a total of approximately 25 to 50 cooperative agreement(s) under the 2023 CSB Grant Program Notice of Funding Opportunity (NOFO), subject to the availability of funds, the quantity and quality of applications received, Agency priorities, and other applicable considerations. In making the final funding decisions, EPA may also consider programmatic priorities and geographic diversity of funds, number and size of awards, environmental benefits, applicability of different business models, and other Agency and programmatic priorities.

Date Posted: 6/5/2023

**1.12**: Who should applicants contact with questions or for assistance completing in forms?

**Answer:** Please email cleanschoolbus@epa.gov for assistance.

Date Posted: 6/5/2023

**1.13**: Who do I contact with questions about EV infrastructure?

**Answer:** For technical assistance on planning and deploying clean school buses and infrastructure, please contact cleanschoolbusTA@nrel.gov.

Date Posted: 6/5/2023

**1.14**: Will an EPA representative meet with our Board of Education to discuss the program?

**Answer:** Depending on time and resource availability, Regional EPA staff members may be available to meet with Board of Education members; please reach out to your Regional EPA Office with requests to meet. If you have specific questions about the program, we encourage you to submit them to cleanschoolbus@epa.gov.

**1.15**: Is there Inflation Reduction Act funding that will support infrastructure for electric school buses?

**Answer:** The Inflation Reduction Act provides funding for clean transportation, including \$1 billion for medium- and heavy- duty zero-emission vehicle replacements, which may include school buses.

EPA has hosted listening sessions with stakeholders for this program; more information can be found here <a href="https://www.epa.gov/inflation-reduction-act/clean-heavy-duty-vehicle-program">https://www.epa.gov/inflation-reduction-act/clean-heavy-duty-vehicle-program</a>. EPA has also released a technical request for information to gather more input on the current status of the zero-emission market and infrastructure needs, among other potential areas (Docket ID: EPA-HQ-OAR-2023-0216). EPA is accepting submissions to this request through Monday June 5, 2023.

In addition, EPA is partnering with The Joint Office of Energy and Transportation (JOET) and the National Renewable Laboratory to offer clean school bus technical assistance to school districts, including information and tools needed to successfully plan and deploy clean school buses and infrastructure. JOET may be able to help potential applicants identify other sources of federal, state, and local funding relevant to electric school bus projects. Please visit <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance">https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance</a> for more information. Potential applicants can also contact JOET technical assistance by emailing cleanschoolbusTA@nrel.gov.

Date Posted: 6/5/2023

**1.16**: Where can I find more technical information about electric bus capabilities? I'm not sure electric buses will work in my area because of the conditions.

**Answer:** EPA is partnering with The Joint Office of Energy and Transportation (JOET) and the National Renewable Laboratory to offer clean school bus technical assistance to school districts, including information and tools needed to successfully plan and deploy clean school buses and infrastructure. Please visit <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance">https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance</a> for more information. Potential applicants can also contact JOET technical assistance by emailing <a href="mailto:cleanschoolbusTA@nrel.gov">cleanschoolbusTA@nrel.gov</a>.

In addition, the Department of Energy (DOE) offers information about the benefits of electric school buses and examples of their use:

https://afdc.energy.gov/vehicles/electric\_school\_buses.html. Other, non-governmental sources also offer helpful resources. For example, the World Resources Institute has created an electric vehicle buyer's guide: <a href="https://www.wri.org/initiatives/electric-school-bus-initiative/implementation-resources-tools">https://www.wri.org/initiatives/electric-school-bus-initiative/implementation-resources-tools</a>.

Date Posted: 6/5/2023

**1.17**: Is the EPA Clean Heavy-Duty Vehicles Program different from the EPA Clean School Bus Program?

**Answer:** Yes. For more information about the Clean Heavy-Duty Vehicle Program, please see <a href="https://www.epa.gov/inflation-reduction-act/clean-heavy-duty-vehicle-program">https://www.epa.gov/inflation-reduction-act/clean-heavy-duty-vehicle-program</a>.

1.18: How does the 2023 CSB Grant Program provide support for workforce training?

**Answer:** The 2023 CSB Grant Program includes several initiatives to clearly support workforce training. For example, the Notice of Funding Opportunity (NOFO) includes a specific evaluation criterion labeled "Workforce Development", for which applicants may be awarded up to 5 possible points. In addition, CSB grantees will be able to spend grant funds on workforce development and training. For example, funding can go towards training resources and programs for drivers and maintenance teams, as well as efforts to train electricians on installing charging infrastructure for electric school buses.

Date Posted: 6/5/2023

#### **1.19**: What is the CSB Program doing to support good labor practices?

Answer: EPA is taking several steps in the 2023 CSB Grant Program to support the creation of high-quality jobs and expand economic opportunity through these federal investments. In the grant competition, applicants will be evaluated based, in part, on the extent to which their application demonstrates a plan to prepare their workforce for their new buses and infrastructure. For example, they may consider impacts to their current driver and maintenance staff and explain their plan for addressing those impacts. This may involve strategies such as training and policies to prevent the displacement of current staff. In addition, EPA will require electricians installing, maintaining, and operating charging infrastructure to be certified in the Electric Vehicle Infrastructure Training Program (EVITP), or to graduate or receive a continuing education certificate from a registered apprenticeship program for electricians that includes charger-specific training and is developed as a part of a national guideline standard approved by the Department of Labor in consultation with the Department of Transportation. This will protect worker safety when installing electrical equipment and ensure school districts have trained professionals installing their equipment. To support these activities, EPA will continue the practice established in the 2022 CSB Rebate Program that workforce development and training expenses are allowable uses of funds.

In parallel with this grant competition, EPA is starting an opportunity for school bus OEMs to provide information about their workforce development and labor practices that EPA will publish on its website. This will help school districts and partners of the CSB Program understand how these investments are supporting the creation of high-quality jobs in the growing clean school bus market.

Date Posted: 6/5/2023

1.20: Does each EPA Region have a Clean School Bus (CSB) email address for questions?

**Answer:** No, not all EPA Regions have a CSB email address. We encourage you to submit questions to cleanschoolbus@epa.gov.

Date Posted: 6/22/2023

#### **1.21**: Are information session recordings available on the CSB website?

**Answer:** Slides and recordings from informational webinars will be available on the Past Events page at <a href="https://www.epa.gov/cleanschoolbus/events-related-clean-school-bus-program">https://www.epa.gov/cleanschoolbus/events-related-clean-school-bus-program</a>. Please note it may take several weeks for webinar recordings to be posted.

**1.22**: What assistance does the Clean School Bus Program Technical Assistance team provide, particularly with respect to connecting applicants to utilities?

Answer: EPA is partnering with The Joint Office of Energy and Transportation (JOET) and the National Renewable Laboratory (NREL) to offer clean school bus technical assistance to school districts, including information and tools needed to successfully plan and deploy clean school buses and infrastructure. They have expertise in a wide range of clean school bus deployment topics, such as electric bus basics, charging equipment, utility connections, bus performance, and operational considerations like routing and maintenance. An email helpline, <a href="cleanschoolbusTA@nrel.gov">cleanschoolbusTA@nrel.gov</a>, has been created to allow JOET to provide personalized assistance on a case-by-case basis, including information on contacting your local utility. Interested applicants are encouraged to utilize this helpline to ask technical questions. To learn more, please visit <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance">https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance</a>. Date Posted: 6/22/2023

1.23: Are details about the 2023 Clean School Bus Rebate Program available?

**Answer:** No, details about future Clean School Bus funding opportunities are not available at this time. EPA will announce future funding opportunities through the website and newsletter; sign up to receive email updates here.

Date Posted: 6/22/2023

1.24: What is the deadline to submit questions about the 2023 Clean School Bus grants?

**Answer:** The final date to submit questions about the grant program is Wednesday, August 9, 2023, at 11:59 p.m. (ET).

Date Posted: 6/22/2023

**1.25**: Is the EPA 2023 Clean School Bus Grant Program the same program as the Texas Emissions Reduction Plan (TERP) Clean Bus Grant Program?

**Answer:** No. EPA's 2023 Clean School Bus Grant Program is separate from the TERP Clean Bus Grant Program.

Date Posted: 6/22/2023

**1.26**: Can potential applicants meet with an EPA representative?

**Answer:** EPA must avoid preferential treatment for any one applicant, and thus cannot meet with individual applicants to provide specific input on application materials. If you have questions on eligibility, then please submit a detailed question to <a href="mailto:cleanschoolbus@epa.gov">cleanschoolbus@epa.gov</a>. EPA will work to address your question or otherwise follow-up as appropriate.

**1.27**: Does EPA have any programs to drive down the cost of new zero-emission buses?

**Answer:** One of the Clean School Bus Program goals is to lower the price of electric school buses so that they are more accessible to all communities. For instance, the 2023 Grant Program and 2022 Rebate Program have both offered tiered funding such that school districts that meet the prioritization criteria of each funding opportunity receive a higher funding amount for each respective bus size. The tiered funding approach can help to encourage lower market prices through creating a market demand for lower priced buses, as well as increasing production volumes such that manufacturers can reduce per unit costs. In addition, in the 2023 CSB Grant Program, funding for buses and electric infrastructure is offered as one lump sum to give grantees more flexibility to split this sum between buses and infrastructure in a way that is most advantageous for them. Similar to the tiered approach, this flexibility can create a market demand for lower priced buses.

Date Posted: 6/22/2023

**1.28**: Will the 2023 Clean School Bus (CSB) Grants Notice of Funding Opportunity (NOFO) Information Sessions hosted by EPA's CSB Program be identical?

**Answer:** No. While some of the information sessions will cover similar material, EPA plans to cover a variety of topics. EPA expects to focus some informational sessions on more programmatic material (e.g., overviews of the 2023 CSB Grants funding opportunity and the application process) while others would focus on more technical topics (e.g., utility planning). New questions and answers from each webinar will be incorporated into the Q&A document on the website. Slides and recordings from informational webinars can also be viewed on the Past Events page. Please note it may take several weeks for webinar recordings to be posted.

Date Posted: 6/22/2023

**1.29**: Is the workforce and labor practices questionnaire that EPA has published on their website just for bus Original Equipment Manufacturers (OEMs), or is it infrastructure manufacturers as well?

**Answer:** The questionnaire is intended for clean school bus OEMs. Results of the questionnaire are now available on the <u>EPA website</u>.

Date Posted: 7/10/2023

**1.30**: Can the resources for schools to work with utilities produced by Edison Electric Institute (EEI) and Beneficial Electrification League (BEL) be made public?

Answer: EPA is not aware of any relevant resources produced by EEI and BEL that are not publicly available. The EEI and BEL work with electric cooperatives, investor-owned utilities, and municipal organizations to support school bus electrification. For example, BEL and EEI provide webinars, assist local schools in applying for grants or other funding opportunities, and provide learning opportunities for technologies (e.g., vehicle-to-grid opportunities). For more information on BEL resources, please refer to BEL's webpage <a href="www.be-league.org/buses">www.be-league.org/buses</a> or reach out to BEL via email at <a href="electricbuses@be-league.org">electricbuses@be-league.org</a> to seek assistance in working with electric cooperatives and municipal utilities on school bus programs. For more information on EEI resources and working with investor-owned utilities, please refer to EEI's Electric Transportation page <a href="https://www.eei.org/issues-and-policy/electric-transportation">https://www.eei.org/issues-and-policy/electric-transportation</a> or reach out to Charles Satterfield at <a href="mailto:csatterfield@eei.org">csatterfield@eei.org</a>.

Date Posted: 7/10/2023

**1.31**: How many applications do you anticipate receiving for the 2023 CSB Grants?

**Answer:** EPA cannot estimate the number of applications that will be submitted.

Date Posted: 7/10/2023

**1.32**: If a school district has already been awarded a rebate through the 2022 CSB Rebates program, do they automatically qualify for the grant? And if so, are they held to the same 15 vehicle minimum?

**Answer:** The CSB Rebates and CSB Grants are separate programs, and applicants must apply to each program. Please refer to the 2023 CSB Notice of Funding Opportunity (NOFO) for specifics on applicant and project eligibility, as there are differences between the two programs' requirements. Buses purchased under previous rounds of CSB funding do not count towards the bus minimums and maximums in this NOFO.

Date Posted: 7/10/2023

**1.33**: Can we apply for the 2023 grant and the 2023 rebate program?

**Answer:** Yes, organizations are encouraged to apply for all funding opportunities for which they are eligible. Organizations must submit an application for each funding opportunity and must meet the eligibility requirements for each funding opportunity.

Date Posted: 7/14/2023

**1.34**: How does the Clean School Bus Program contribute to creating equity for children/students residing in "communities of opportunities"?

**Answer:** The CSB program statute enables the program to target communities adversely and disproportionately affected by environmental, climate change, and human health harms or risks, and enables the program to support a broad geographic distribution of funds. CSB has also been identified as part of the Justice40 Initiative, which provides a goal that 40 percent of applicable federal benefits flow to disadvantaged communities.

Date Posted: 7/14/2023

**1.35**: How does EPA provide information about the benefits of the Clean School Bus Program to school districts? Has EPA taken any feedback from successful and unsuccessful applicants and used it to modify education and outreach for 2023 CSB funding opportunities?

**Answer:** EPA provides information on the benefits of clean school buses on our website (https://www.epa.gov/cleanschoolbus/benefits-clean-school-buses).

EPA has engaged in numerous efforts to gather feedback from stakeholders on the 2022 CSB Rebates, including a dedicated listening session for 2022 rebate applicants to provide feedback, a dedicated CSB email box for stakeholders to provide input, and other listening sessions at the regional level. EPA has incorporated stakeholder feedback into our outreach plans for the 2023 CSB funding opportunities in several ways. For instance, several of our informational webinars scheduled for Summer 2023 address topics identified through the feedback opportunities noted above as critical information for potential applicants.

Date Posted: 7/14/2023

**1.36**: Is there a list for future EPA Clean School Bus program work or bidding opportunities? We are a full-service engineering firm that specializes in the design of electric vehicle charging stations.

**Answer:** No, EPA does not maintain such a list.

Date Posted: 7/14/2023

**1.37**: Please define electric vehicle supply equipment (EVSE).

**Answer:** As detailed in Section III.D.4.d of the Notice of Funding Opportunity (NOFO), electric vehicle supply equipment (EVSE) for new electric buses includes the unit and charging cable, mount and/or pedestal, and electrical panels. In addition to the EVSE itself, upgrades to existing electrical panels or electrical service, wiring/conduit and its installation, and installation, such as design and engineering or labor (i.e., infrastructure costs associated with work on the customer's side of the electrical meter), as well as management software either as standalone or part of the EVSE unit, are also eligible costs. Note, CSB funds must not be used for any infrastructure costs associated with work on the utility's side of the electrical meter.

Date Posted: 7/14/2023

**1.38**: When will the next round of Clean School Bus Rebate funding be announced?

**Answer:** EPA anticipates announcing another Rebate program later in 2023. EPA will announce future funding opportunities through the website and newsletter. Sign up <a href="here">here</a> to receive email updates on CSB Funding Opportunities.

Date Posted: 7/14/2023

**1.39**: Does EPA have an estimate on the conversion rate of federal funding to the number of clean school buses purchased?

**Answer:** Due to the fact that funding amounts per bus vary depending on (1) the replacement bus fuel type, (2) the replacement bus size, and (3) whether the school district(s) that will be served by the buses meets one or more prioritization criteria, EPA is not able to provide an estimate at this time on the conversion rate of federal funding to the number of clean school buses that will be purchased under the 2023 Grant Program.

Date Posted: 7/14/2023

**1.40**: How many buses does the EPA anticipate funding over the life of the Clean School Bus Program?

**Answer:** EPA is not able to provide an estimate of the number of buses that may be funded over the life of the Clean School Bus program due to a variety of factors, including that funding amounts per bus vary based on: (1) the replacement bus fuel type, (2) the replacement bus size, and (3) whether the school district(s) that will be served by the buses meets one or more prioritization criteria.

Date Posted: 7/14/2023

**1.41**: Will half of the Clean School Bus Program funds go to zero emission (ZE) school buses and half to clean school buses?

**Answer:** Under the statutory design for the CSB Program, each year, half of the available funding is dedicated to ZE school buses and half is dedicated to clean school buses. A ZE school bus is a school bus that produces zero exhaust emissions of any criteria pollutant or greenhouse gas; a clean school bus reduces emissions by operating entirely or in part using an alternative fuel, such as propane or natural gas, or is a ZE bus. All fiscal year funds in the Clean School Bus program will be split 50/50 per the statute.

Date Posted: 7/14/2023

**1.42**: Does the statutory limitation that a single state must receive no more than 10% of the Clean School Bus funding per fiscal year reset annually? Does this limitation also apply to U.S. territories?

**Answer:** Yes, the 10% limitation resets each fiscal year. Territories are considered states in the context of this limitation.

Date Posted: 7/20/2023

**1.43**: Can a single application target multiple fleets under the School District Sub-Program?

**Answer:** Applications under the School District Sub-Program must only list one school district or Tribal applicant (see Question 2.20 for more information), but the application may target multiple fleets serving the applicant. For example, a school district may contract with multiple private fleets to provide bus service.

Date Posted: 8/17/2023

**1.44**: How do the operating costs of electric buses differ from traditional buses?

**Answer:** Operating costs of electric buses are dependent on factors such as bus efficiency, route distance, charging times, electricity rates, etc. Interested applicants are encouraged to contact the Joint Office of Energy and Transportation (JOET) and the National Renewable Laboratory (NREL) with technical questions using the helpline, <a href="mailto:cleanschoolbusTA@nrel.gov">cleanschoolbusTA@nrel.gov</a>. JOET and NREL have expertise in a wide range of clean school bus topics, including operational considerations.

Date Posted: 8/17/2023

#### **1.45**: How can we engage stakeholders in this project?

Answer: Applications will receive points for community engagement under Section 3.B -Environmental Justice and Disadvantaged Communities. Applicants are encouraged to consider meaningful engagement with affected communities and/or populations, especially local residents, to ensure their meaningful participation with respect to the design, planning, and performance of the project. Meaningful engagement means people have an opportunity to participate in decisions about activities that may affect their environment and/or health; the public's contribution can influence the regulatory agency's decision; community concerns will be considered in the decision-making process; and decision makers will seek out and facilitate the involvement of those potentially affected.

EPA has selected 17 Environmental Justice Thriving Communities Technical Assistance Centers (EJ TCTACs) in partnership with the U.S. Department of Energy; these centers will provide training and other assistance to build capacity for navigating federal grant application systems, writing strong grant proposals, and effectively managing grant funding. Additionally, these centers will provide guidance on community engagement, meeting facilitation, and translation and interpretation services for limited English-speaking participants. For more information on EJ TCTACs, please refer to

https://www.epa.gov/environmentaljustice/environmental-justice-thriving-communities-technicalassistance-centers.

Date Posted: 8/17/2023

**1.46**: Can EPA provide guidance on winter performance and the range of electric school buses?

Answer: EPA recommends contacting electric bus manufacturers to determine which bus models, charging solutions, and bus storage options are recommended for your climate and route needs. Additionally, the Joint Office of Energy and Transportation (JOET) and the National Renewable Laboratory (NREL) have partnered with EPA to offer clean school bus technical assistance to school districts, including information and tools needed to successfully plan and deploy school buses and infrastructure. They have expertise in a wide range of clean school bus deployment topics, including bus performance and operational considerations. Interested applicants are encouraged to send their technical questions to JOET using the helpline, cleanschoolbusTA@nrel.gov. JOET has also put together a resource, Cold Weather Considerations for Electric School Buses, which can be accessed here: https://www.epa.gov/system/files/documents/2023-04/elec-schl-bus-cold-weather-consider-

2023-04-19.pdf.

Date Posted: 8/17/2023

1.47: When can EV infrastructure companies expect the opportunity to bid for installation work related to the 2023 Clean School Bus Grants?

Answer: EPA cannot provide information about when installation work will be up for bid. Each applicant will be responsible for following federal, state, and local procurement laws if selected as a grantee. Installation must be completed during the project period, which is estimated to start on April 1, 2024, and last up to 24 months, or up to 36 months where justified.

Date Posted: 8/17/2023

**1.48**: How can potential applicants be connected with their utility via Edison Electric Institute (EEI) and the Beneficial Electrification League (BEL)?

Answer: Please email <a href="mailto:cleanschoolbusTA@nrel.gov">cleanschoolbusTA@nrel.gov</a> to be connected to direct points of contact at EEI member electric providers and at BEL. For more information on BEL resources, please refer to BEL's webpage <a href="mailto:www.be-league.org">www.be-league.org</a>/buses or reach out to BEL via email at <a href="mailto:electricbuses@be-league.org">electricbuses@be-league.org</a> to seek assistance in working with electric cooperatives and municipal utilities on school bus programs. For more information on EEI resources and working with investor-owned utilities, please refer to EEI's Electric Transportation page <a href="mailto:https://www.eei.org/issues-and-policy/electric-transportation">https://www.eei.org/issues-and-policy/electric-transportation</a> or reach out to Charles Satterfield at <a href="mailto:csatterfield@eei.org">csatterfield@eei.org</a>. Please see Question 1.22 for additional information on how the Clean School Bus Program Technical Assistance team can help connect applicants to utilities.

Date Posted: 8/17/2023

**1.49**: Does EPA have outreach materials for students about EPA's Clean School Bus Program?

**Answer:** EPA is currently developing materials for students. These materials will be posted to the CSB website when available.

Date Posted: 8/17/2023

**1.50**: What is the typical kW charging requirement per bus?

**Answer:** Charging requirements are dependent on factors such as bus efficiency, route distance, charging times etc. Please email cleanschoolbusTA@nrel.gov for assistance.

Date Posted: 8/17/2023

**1.51**: Does EPA have any promotional materials, such as stickers, that can be shared with the community to emphasize the positive impact of the Clean School Bus Program and electric buses?

**Answer:** Information on the positive impacts of electric and clean school buses is available on the Clean School Bus Program's Benefits of Clean School Buses page at <a href="https://www.epa.gov/cleanschoolbus/benefits-clean-school-buses">https://www.epa.gov/cleanschoolbus/benefits-clean-school-buses</a>. The Clean School Bus one-pager offers an overview of the program and is available at <a href="https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1016GOD.pdf">https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1016GOD.pdf</a>. We do not currently have promotional items (e.g., stickers, posters) available. These materials will be posted to the CSB website if they become available.

Date Posted: 8/21/2023

**1.52**: Does EPA have tools to show current air quality and the improvements of air quality due to the introduction of zero and low-emission buses/vehicles?

**Answer:** The Diesel Emissions Quantifier (DEQ) is an interactive, web-based tool for users with little or no modeling experience that evaluates clean diesel projects and upgrade options for medium-heavy and heavy-heavy duty diesel engines, including expected emissions reductions that will contribute to improved air quality. The DEQ is available at <a href="https://cfpub.epa.gov/quantifier/index.cfm?action=main.home">https://cfpub.epa.gov/quantifier/index.cfm?action=main.home</a>. EPA offers additional air quality modeling tools at <a href="https://www.epa.gov/air-research/air-quality-modeling">https://www.epa.gov/air-research/air-quality-modeling</a>. In addition, the AirNow

website (https://www.airnow.gov/) provides current air quality for locations across the U.S.

Date Posted: 8/21/2023

**1.53**: Will National Electric Vehicle Infrastructure (NEVI) standards pertaining to privately sited charging stations (e.g., cybersecurity standards) be recommended for applicants?

**Answer:** No, NEVI standards are not required under the 2023 CSB Grants.

Date Posted: 8/21/2023

1.54: Does the Clean School Bus Program have a utility stakeholder group? If so, how do I join?

**Answer:** EPA holds stakeholder meetings with different stakeholder groups throughout the year; to be included in the stakeholder group meeting most relevant to your organization, please email cleanschoolbus@epa.gov with a brief description of your organization type.

Date Posted: 12/21/2023

#### 1.55: Is EPA tracking bus pricing trends?

**Answer:** EPA is currently tracking the prices of buses funded through the CSB Program and is working with industry and stakeholder organizations to better understand long-term price trends for clean school buses and their components. One of the goals of the CSB Program is to lower the prices of electric school buses to be more accessible to all communities in the longer-term. The World Resources Institute maintains a document that includes tables showing some electric school bus models with pricing estimates and mileage ranges here:

https://www.wri.org/research/electric-school-bus-us-market-study-and-buyers-guide-resource-school-bus-operators.

Date Posted: 12/21/2023

**1.56**: Who has access to the resources on the EPA Clean School Bus webpage (e.g., technical assistance, charging and fueling infrastructure, tax credits, workforce development, training resources)?

**Answer:** CSB Program stakeholders, including applicants, grantees, and school districts, have complete access to the resources. Resources are available on the Clean School Bus website at <a href="https://www.epa.gov/cleanschoolbus/">https://www.epa.gov/cleanschoolbus/</a>.

Date Posted: 7/24/2024

**1.57**: When is the next EPA Clean School Bus (CSB) funding opportunity, specifically the estimated opening date?

**Answer:** In September 2024, the EPA announced its fourth CSB Program funding opportunity and third CSB Rebate Program. The deadline for submitting applications for this rebate program is January 9, 2025. For more information, please refer to the <u>CSB Program website</u> and sign up for the <u>CSB Listserv</u>.

Date Posted: 10/28/2024

## 2. Eligible Applicants

2.1: Who is eligible to apply?

1. **Answer:** Public School Districts with a National Center for Education Statistics (NCES) District ID

- a. One or more local or State governmental entities responsible for:
  - i. Providing school bus service to one or more public school systems; or
  - ii. The purchase, lease, license, or contract for service of school buses;
- b. A public charter school district responsible for the purchase, lease, license, or contract for service of school buses for that charter school; or

#### 2. Tribal Applicants

- a. An Indian Tribe (as defined by section 4 of the Indian Self-Determination and Education Assistance Act, 25 U.S.C. 5304), Tribal organization (as defined by the same section), or Tribally-controlled school (as defined by section 5212 of the Tribally Controlled Schools Act of 1988, 25 U.S.C. 2511) that is responsible for:
  - Providing school bus service to one or more Bureau-funded schools (as defined by section 1141 of the Education Amendments of 1978, 25 U.S.C. 2021); or
  - ii. The purchase, lease, license, or contract for service of school buses;

#### 3. Third Parties

- a. A nonprofit school transportation association; or
- b. An eligible contractor, meaning any for-profit, not-for-profit, or nonprofit entity that has the capacity:
  - i. To sell, lease, license, or contract for service clean school buses, zeroemission school buses, charging or fueling infrastructure, or other equipment needed to charge, fuel, or maintain clean school buses or zero-emission school buses, to individuals or entities that own, lease, license, or contract for service a school bus or a fleet of school buses; or
  - ii. Arrange financing for such a sale, lease, license, or contract for service.

"Eligible contractor" generally includes school bus dealers, Original Equipment Manufacturers (OEMs), school bus service providers, and private school bus fleets that provide student transportation services. For more information, please see section III.A of the Notice of Funding Opportunity (NOFO).

Date Posted: 6/5/2023

**2.2**: Our organization was not an eligible applicant for the 2022 Clean School Bus Rebates. Does this mean we are not eligible for the 2023 Clean School Bus Grants?

**Answer:** Eligibility requirements for the 2023 CSB Grants have changed slightly from the 2022 CSB Rebates. In particular, the 2023 CSB Grant Program reflects several changes to the statute based on the amendments to Section 741 of the Energy Policy Act of 2005 (42 § U.S.C. 16091) contained in the FY 2023 Consolidated Appropriations Act (see Question 1.6). For example, private bus fleets providing student transportation services are now able to apply directly in the 2023 CSB Grants funding opportunity. Please see Section III.A of the Notice of Funding Opportunity (NOFO) for more detailed information on eligible applicants.

2.3: Are private schools eligible to receive CSB funding?

**Answer:** Private schools are not eligible to receive CSB funding. Per the CSB statute, school buses must serve local educational agencies.

Date Posted: 6/5/2023

**2.4**: Are charter schools eligible to apply?

**Answer:** Public charter schools with a National Center for Education Statistics (NCES) District ID (https://nces.ed.gov/ccd/districtsearch/) are eligible to apply for funding.

Date Posted: 6/5/2023

**2.5**: Are state governmental entities, who could procure federally funded school buses to disperse to school districts or could provide grants or rebates to school districts for eligible school bus purchases, eligible applicants?

Answer: If the state governmental entity is responsible (1) providing school bus service to one or more public school systems or (2) the purchase, lease, license, or contract for service of school buses, then it is eligible under the School District Sub-Program. If the state governmental entity applies through the School District Sub-Program, it is subject to the same bus minimum (15 buses) and bus maximum (50 buses) requirements as other School District Sub-Program applicants. Because prioritization points are awarded depending on the school districts being served, the state governmental entity should list all school districts being served in their application. A state governmental entity is not an eligible applicant under the Third-Party Sub-Program because it is not a "for-profit, not-for-profit, or nonprofit entity." EPA encourages state governmental entities interested in applying to reach out if they have eligibility questions so that EPA may assist on a case-by-case basis.

Date Posted: 6/5/2023

2.6: Are Head Start and community-based childcare programs eligible to apply?

**Answer:** Head Start and community-based childcare programs cannot apply directly for funds, but if they operate as part a school district with a National Center for Education Statistics (NCES) District ID (<a href="https://nces.ed.gov/ccd/districtsearch/">https://nces.ed.gov/ccd/districtsearch/</a>), then that school district could apply for funding to replace buses serving the Head Start program. The proposed project must not be funded by other federal funds (e.g., Head Start grant funds).

Date Posted: 6/5/2023

**2.7**: Are technical school districts eligible to apply?

**Answer:** Elementary and/or secondary school districts that provide bus service are eligible to apply. This can include technical school districts.

Date Posted: 6/5/2023

2.8: Are tribal colleges eligible to apply?

**Answer:** No. Existing buses to be replaced and new replacement buses must serve an elementary and/or secondary school district.

**2.9**: Are Tribal schools that are not funded by the Bureau of Indian Affairs (BIA) eligible to apply?

**Answer:** Eligible applicants include "Indian tribes, tribal organizations, or tribally controlled schools responsible for the purchase, lease, license, or contract for service of school buses." This can include purchasing school buses for Tribal schools that are not funded by the BIA. Applicants applying for these schools will be prompted to input a National Center for Education Statistics (NCES) District ID on the application, but may not have such an ID. In this scenario, the applicant should reply to <a href="mailto:cleanschoolbus@epa.gov">cleanschoolbus@epa.gov</a> with the name of the school, grades served by the school, and address of the school. EPA will provide additional guidance after receiving this information, including information on prioritization status.

Date Posted: 6/5/2023

**2.10**: Bureau of Indian Affairs funded schools appear to be both eligible to apply directly for funds as well as prioritized for funding. What about Bureau-operated schools?

**Answer:** Bureau-operated schools are not eligible to apply directly for funds because these schools do not qualify as "tribally controlled schools" under the Clean School Bus Program statute. However, an eligible applicant (as defined in Section III.A of the Notice of Funding Opportunity (NOFO)) – such as an eligible contractor, nonprofit school transportation association, Indian Tribe, etc. – could apply to replace buses in their own fleet or in another private bus fleet, which could then serve a Bureau-operated school. The proposed replacement bus and any associated charging infrastructure to be paid for in part by EPA funds must not also be funded by other federal funds (e.g., funds from Bureau of Indian Education or Bureau of Indian Affairs).

Date Posted: 6/5/2023

**2.11**: How can private bus fleets participate in the 2023 CSB Grant Program? Are they directly eligible?

Answer: Private bus fleets may directly participate through the Third-Party Sub-Program as eligible contactors. Applicants applying under the Third-Party Sub-Program must replace between 25 and 100 buses (split between at least four school district beneficiaries, although there is no minimum number of buses required per school district beneficiary as long as the total number of buses for the third-party grant is between 25 and 100). Additionally, other eligible applicants, such as school districts, can apply directly and enter into a contractual arrangement with a private fleet that owns and operates buses, to replace buses that serve a public school district. EPA is not involved in this contractual arrangement. Thus, like in the 2022 CSB Rebates, a private bus fleet may participate indirectly by having the school district they serve apply through the School District Sub-Program. If selected, the school district could pass funds to the private fleet to replace the buses in that fleet. Please note that EPA can only provide funds to the direct applicant.

**2.12**: How does EPA define "nonprofit school transportation association"?

**Answer:** For the purposes of applicant eligibility under the 2023 CSB Grant Program, EPA defines "nonprofit school transportation association" as nonprofit associations dedicated primarily to school bus transportation. A nonprofit association dedicated primarily to other work, including work associated with public education, would not be eligible to apply as a "nonprofit school transportation association."

Date Posted: 6/5/2023

2.13: Are electric vehicle charging companies eligible to apply?

**Answer:** Yes, provided the electric vehicle charging companies meet the definition of Eligible Contractors outlined in Section III.A of the Notice of Funding Opportunity (NOFO).

Date Posted: 6/5/2023

**2.14**: How is the capacity to sell, lease, license, or contract for service defined for eligible contractors?

**Answer:** An eligible contractor must sell, lease, license or have a contract with another entity for clean school buses, zero-emission school buses, charging or fueling infrastructure, or other equipment needed to charge, fuel, or maintain clean school buses or zero-emission school buses.

Date Posted: 6/5/2023

**2.15**: Can applications include buses that would serve schools outside of the U.S. states and territories?

**Answer:** No. Applications for buses that would serve schools outside the 50 states, D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands are not eligible for funding.

Date Posted: 6/5/2023

**2.16**: Our school has a small fleet (less than 15 buses) and therefore cannot meet the School District Sub-Program bus minimum requirements. How could we participate in the Clean School Bus Program?

**Answer:** Applicants in the School District Sub-Program must request a minimum of 15 school buses and can request up to a maximum of 50 school buses. If a public school district or Tribal applicant (as defined in Section III.A of the Notice of Funding Opportunity (NOFO)) cannot meet the 15-bus minimum, they may still participate in the CSB Grant Program by partnering with a third party (as defined in Section III.A of the NOFO). The third party would be the direct applicant and would have to apply for a minimum of 25 buses to serve at least 4 school district beneficiaries. Under this option, the requested school buses could be split in such a way that one of the school districts only replaces one or two buses (there is no minimum number of buses required per school district beneficiary as long as the total number of buses for the third-party grant is between 25 and 100). Alternatively, you could wait and apply to the 2023 CSB Rebate Program once it opens later this year. EPA encourages school districts to consider which competition structure best suits their needs.

**2.17**: How can an Indian Tribe receive funding and work with a private bus company to turn over their fleet?

**Answer:** The Indian Tribe or Tribal school district can apply as a direct applicant and enter into a contractual arrangement with a private fleet that owns and operates buses, provided it meets the eligibility requirements, including bus minimums and maximums for the School District Sub-Program. Alternatively, the private bus company may apply directly, provided it meets the eligibility requirements (including Third-Party Sub-Program bus minimums and maximums and serving at least four school district beneficiaries). Under either pathway, the private bus company must ensure that the new buses continue to serve the Tribal school district for at least 5 years from the date of delivery (or another school district eligible for the same or higher priority consideration if the award is to the private bus company and the contract with the school district ends before the end of the 5-year period).

Date Posted: 6/5/2023

**2.18**: Is it required for a school district to obtain a resolution from the school board to apply for this grant?

**Answer:** EPA does not require school districts to obtain a resolution from the school board to be eligible for funding. However, some school boards may have internal policies requiring a resolution before applying for federal funds. EPA encourages applicants to work with their school board early in the application process to ensure that, if selected for funding, the project can move forward as expeditiously as possible.

Date Posted: 6/5/2023

**2.19**: What is the maximum number of school districts Third-Party Sub-Program applicants can include in one grant application?

**Answer:** There is no upper limit to the number of school district beneficiaries that may be included in a Third-Party Sub-Program application, as long as the request does not exceed the maximum number of buses (up to 100 buses).

Date Posted: 6/22/2023

**2.20**: Can two or more school districts apply together to meet the 15-bus minimum under the School District Sub-Program?

**Answer:** No, two or more school districts may not apply together under the School District Sub-Program. However, they may wish to consider partnering with a third-party. In that scenario, the third-party would be the direct applicant and would have to apply for a minimum of 25 buses to serve at least 4 school district beneficiaries.

**2.21**: Does EPA have resources for connecting school districts with third parties so small districts are eligible to apply for the grant?

**Answer:** Due to grant competition fairness, EPA is not able to connect school districts with potential third-party applicants; however, EPA has partnered with the Joint Office of Energy and Transportation (JOET) to offer technical assistance to potential applicants (<a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance#TA-Resources">https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance#TA-Resources</a>).

Separately, EPA has also selected 17 Environmental Justice Thriving Communities Technical Assistance Centers (EJ TCTACs) in partnership with the U.S. Department of Energy; these centers will provide training and other assistance to build capacity for navigating federal grant application systems, writing strong grant proposals, and effectively managing grant funding. For more information on EJ TCTACs, please refer to

https://www.epa.gov/environmentaljustice/environmental-justice-thriving-communities-technical-assistance-centers.

In addition, other independent organizations such as the World Resources Institute (<a href="https://electricschoolbusinitiative.org/">https://electricschoolbusinitiative.org/</a>) and Electrification Coalition (<a href="https://electrificationcoalition.org/schoolbus/">https://electrificationcoalition.org/schoolbus/</a>) may have relevant resources. Alternatively, you could wait and apply to the 2023 CSB Rebate Program once it opens later this year. See Question 1.2 for more information on the difference between a grant and a rebate. EPA encourages school districts to consider which competition structure best suits their needs.

Date Posted: 6/22/2023

**2.22**: Do all school districts listed in an application in the Third-Party Sub-Program need to have a SAM.gov and Grants.gov account?

**Answer:** No, only the direct applicant (in this case, the third party) needs to have SAM.gov and Grants.gov accounts.

Date Posted: 6/22/2023

#### 2.23: Do school districts have to be Title I to be eligible for funding?

Answer: No. Title I is a federal grant program that provides funding to schools or school divisions with high numbers or percentages of children from low-income families. School districts do not have to receive Title I funding to be eligible for Clean School Bus funding. However, school districts not already on the Prioritized Districts List may be eligible to self-certify their low-income prioritization status if they are: (1) Title I funded districts that do not have SAIPE data OR (2) Title I funded very large school districts (more than 45 schools or more than 35,000 students). Districts in either of these categories may self-certify their prioritization status. Very large school districts (as described in the second category) may either: (A) apply on behalf of Title I sub-districts or individual schools if buses would be used primarily for those Title I schools/sub-districts OR (B) apply for the entire district if at least 80% of the district is Title I schools. Please see the Prioritization Self-Certification Instructions on the CSB Grants webpage for more information on which districts are eligible for self-certification and how to self-certify districts on your application.

**2.24**: Are utilities eligible under the Third-Party Sub-Program?

**Answer:** Utilities may be eligible applicants under the Third-Party Sub-Program if they are a forprofit, not-for-profit, or nonprofit entity that has the capacity (1) to sell, lease, license, or contract for service clean school buses, ZE school buses, charging or fueling infrastructure, or other equipment needed to charge, fuel, or maintain clean school buses or zero-emission school buses, to individuals or entities that own, lease, license, or contract for service a school bus or a fleet of school buses; or (2) arrange financing for such a sale, lease, license, or contract for service.

Date Posted: 6/22/2023

**2.25**: Do all schools included on a single application in the Third-Party Sub-Program need to be located in the same EPA Region?

Answer: Yes.

Date Posted: 6/22/2023

**2.26**: Can a third-party applicant serve four different school sites for one large school district/local education agency? Or must it be four separate school districts?

**Answer:** Third-party applicants must serve at least four school district beneficiaries, not four sites within the same school district/local education agency.

Date Posted: 6/22/2023

**2.27**: Is it necessary to have a third-party apply for grants on your organization's behalf?

**Answer:** No, school districts and Tribal applicants (as defined in Section III.A of the Notice of Funding Opportunity) may apply directly under the School District Sub-Program as long as they meet all applicant and project eligibility requirements (e.g., bus minimum and maximums).

Date Posted: 6/22/2023

**2.28**: In states where school buses must be sold through a dealer, can the Original Equipment Manufacturer (OEM) submit the application or does the dealer have to submit the application?

**Answer:** Either the OEM or the dealer may submit the application under the Third-Party Sub-Program. However, please note that EPA can only provide funds to the direct applicant and EPA is not involved in any contractual arrangements between an OEM, dealer, and/or school district. In addition to any federal requirements under the grant, the replacement buses will need to be purchased in compliance with applicable state, Tribal, or local procurement laws.

Date Posted: 7/10/2023

**2.29**: Does a school district applicant need to partner with a specific dealer or Original Equipment Manufacturer (OEM) in order to apply? If a school district lists specific proposed vehicle and infrastructure makes and models in its application, can the school district change the vehicle/infrastructure makes and models after being awarded the grant?

Answer: Eligible school district applicants do not need to partner with a specific dealer or OEM in order to apply. Applicants should provide a detailed estimated breakdown of bus and infrastructure costs in the proper budget category for each activity requesting funds. Although applicants are not required to know or list specific vehicle and infrastructure makes and models at the time of application, applicants may want to get an estimated quote for buses and, if applicable, charging infrastructure and associated installation, to better estimate these budget breakdowns. After award, applicants may change the vehicle/infrastructure makes and models. Changes to the fuel type or GVWR of the new bus may result in an adjustment of funding. If you intend to name a contractor (including an individual consultant or equipment vendor) as a project partner or other type of participant in your application, EPA recommends that you carefully review, and comply with, the directions contained in the "Contracts and Subawards" clause that can be accessed under Section I.F. of this Notice of Funding Opportunity (NOFO) and at EPA Solicitation Clauses. Refer to EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements for additional guidance. Applicants must demonstrate that named contractors (including individual consultants and equipment vendors) were selected in compliance with the competitive requirements of the Procurement Standards in 2 CFR Part 200 as interpreted in EPA guidance.

Date Posted: 7/10/2023

**2.30**: Where is the priority area list?

**Answer:** Please see the 2023 CSB Grants priority area list at <a href="https://www.epa.gov/system/files/documents/2023-04/fy23-csb-grant-priority-area-list-2023-04.pdf">https://www.epa.gov/system/files/documents/2023-04/fy23-csb-grant-priority-area-list-2023-04.pdf</a>.

Date Posted: 7/10/2023

**2.31**: If a school district does not qualify as a disadvantaged community under one or more prioritizations, can they still apply?

**Answer:** Yes, school districts that do not meet any of the prioritization criteria listed in the 2023 CSB Notice of Funding Opportunity (NOFO) are eligible to apply.

Date Posted: 7/10/2023

**2.32**: Can an Original Equipment Manufacturer (OEM) and its partnering dealership submit separate applications with different school districts and buses, to the same EPA Region?

**Answer:** Yes, as the OEM and its partnership dealership are independently eligible and have their own UEIs, they may submit separate applications to the same Region; however, each entity may only submit one application per Region. At least four school districts must appear on each of their applications. As a reminder, multiple applications may be submitted to replace buses serving the same school district, but the same existing school bus to be replaced cannot appear on multiple applications; each application must contain unique existing school buses to be replaced.

Date Posted: 7/10/2023

**2.33**: If a company submits a Third-Party Sub-Program application by serving four school district beneficiaries, is the company considered the award recipient or are the school districts the award recipient?

**Answer:** Under the Third-Party Sub-Program, the third-party applicant is considered the award recipient. As a reminder, however, please also note that third-party applicants must submit documentation, such as the Third-Party Approval Certification Template, to prove that the school districts being served are aware and approve of the third party's application.

Date Posted: 7/14/2023

**2.34**: Can an Original Equipment Manufacturer (OEM) apply and pass funding to a private bus fleet that owns the bus and serves a public school district?

**Answer:** Yes, an OEM may apply and pass funding to the private fleet (e.g., as a point-of-sale discount on the new buses or some other financial arrangement). The applicant OEM may choose to enter into a contractual arrangement with the private bus fleet and school district. EPA will only provide funds to the direct applicant and is not involved in this contractual arrangement.

Date Posted: 7/14/2023

**2.35**: Are education service agencies (such as Regional Education Service Agencies or Supervisory Unions) who could procure federally funded school buses to disperse to school districts or could provide grants or rebates to school districts for eligible school bus purchases, eligible applicants?

Answer: If the education service agency is responsible for (1) providing school bus service to one or more public school systems or (2) the purchase, lease, license, or contract for service of school buses, then it is eligible under the School District Sub-Program. If the education service agency applies through the School District Sub-Program, it is subject to the same bus minimum (15 buses) and bus maximum (50 buses) requirements as other School District Sub-Program applicants. Because prioritization points are awarded depending on the school districts being served, the education service agency should list all school districts being served in their application. An education service agency is not an eligible applicant under the Third-Party Sub-Program because it is not a "for-profit, not-for-profit, or nonprofit entity." Education services agencies that are uncertain about their eligibility may reach out to EPA with additional details on their organization so that EPA may assist with additional review on a case-by-case basis.

Date Posted: 7/14/2023

**2.36**: Would a School Administrative Unit (SAU), which can represent a single school or multiple school districts across more than one town, have to apply per school or per SAU?

**Answer:** If the SAU is responsible for (1) providing school bus service to one or more public school systems or (2) the purchase, lease, license, or contract for service of school buses, then it is eligible under the School District Sub-Program. If the SAU applies through the School District Sub-Program, it is subject to the same bus minimum (15 buses) and bus maximum (50 buses) requirements as other School District Sub-Program applicants. Because prioritization points are awarded depending on the school districts being served, the SAU should list all school districts being served in their application, whether that is one school district or more.

Date Posted: 7/14/2023

#### **2.37**: Is an upfitter eligible as a contractor?

**Answer:** An upfitter would only be an eligible contractor if it has the capacity (1) to sell, lease, license, or contract for service clean school buses, ZE school buses, charging or fueling infrastructure, or other equipment needed to charge, fuel, or maintain clean school buses or zero-emission school buses, to individuals or entities that own, lease, license, or contract for service a school bus or a fleet of school buses; or (2) to arrange financing for such a sale, lease, license, or contract for service. Please also refer to Section III.D of the Notice of Funding Opportunity (NOFO) for new bus requirements, including the need for new buses to be EPA or CARB certified.

Date Posted: 7/14/2023

**2.38**: If a third-party applicant doesn't have four school district beneficiaries that would like to move forward with clean school bus replacements, can they apply with less than four school district beneficiaries as long as the number of buses applied for is 25 or more?

**Answer:** No. Third-Party Sub-program applicants must serve at least four school district beneficiaries to be eligible for funding under the 2023 CSB Grant Program.

Date Posted: 7/14/2023

2.39: Is a list of Title I-funded school districts and charter school districts available?

**Answer:** EPA does not have a list of Title I-funded school districts and charter school districts at this time. See Questions 4.11, 4.15, and 4.21 for more information on self-certifying a school district's low-income prioritization status.

Date Posted: 7/14/2023

**2.40**: May an education service agency, school administrative unit, and/or state governmental entity, which covers several school districts with their own NCES IDs (such as the New York City (NYC) Chancellor's Office and its 32 geographic districts), be one of the four or more school district beneficiaries listed on a Third-Party Sub-Program application? Should third parties instead list individual school districts within the education service agency, school administrative union, and/or state governmental entity as the school district beneficiaries?

**Answer:** Because several evaluation criteria (e.g., prioritization, project location, project sustainability, workforce development, and project resilience to climate impacts) may depend on details at the school district level, education service agencies, school administrative units, and/or state governmental entities (such as the NYC Chancellor's office) may not be listed as school district beneficiaries on third-party applications. Instead, third-party applicants should list the individual school districts within those education service agencies, school administrative units, and/or state governmental entities that the buses will serve.

For example, in the case of NYC, public schools operate under the overarching NYC Chancellor's office's NCES District ID but there are approximately 32 different geographic areas that also each have their own unique NCES District ID. Under the Third-Party Sub-Program, any or all of these 32 geographic areas could be listed school district beneficiaries; however, third-party applicants could not list the NYC Chancellor's office as a school district beneficiary. Please note, there is no limit to the number of school district beneficiaries that can be listed on a third-party application (as long as the request does not exceed the maximum number of buses allowed per third-party application). Please see Question 3.23 for more information on how buses on third-party applications may be split between multiple school district beneficiaries. Please also see Questions 2.5, 2.35, and 2.36 for more information on how education service agencies, school administrative units, and state governmental entities can participate in the 2023 CSB Grants program.

Date Posted: 7/20/2023

**2.41**: Under Third-Party Sub-Program, what happens if one of four school district beneficiaries decides not to participate?

**Answer:** These instances will be handled on a case-by-case basis. Third parties must include at least four different school district beneficiaries on their applications and must submit documentation, such as the Third-Party Approval Certification Template, that the school districts being served are aware and approve of the third party's application. If a third party submits signed approval certifications for at least four school district beneficiaries but one of the beneficiaries later drops out, reducing the number of school district beneficiaries on the application to less than four, the third-party applicant may be required to find a replacement school district beneficiary. If the replacement school district is differently prioritized than the original school district, the change may affect the applicant's total evaluation points and/or the total funding that the applicant is eligible for.

Additionally, EPA reserves the right to partially fund applications by funding separate portions or phases of proposed projects. If EPA decides to partially fund an application, it will do so in a manner that does not prejudice any applicants or affect the basis upon which the application, or portion thereof, was evaluated and selected for award, thereby maintaining the integrity of the competition and selection process.

Date Posted: 7/20/2023

**2.42**: To be eligible, must a third-party applicant actively either (1) sell, lease, license, or contract for service clean school buses, ZE school buses, charging or fueling infrastructure, or other equipment needed to charge, fuel, or maintain clean school buses or zero-emission school buses, to individuals or entities that own, lease, license, or contract for service a school bus or a fleet of school buses; or (2) arrange financing for such a sale, lease, license, or contract for service to the school districts or for the school buses listed in the application? Or does a potential third-party applicant need only to have the capacity to provide such services?

**Answer:** Third-party applicants must have the capacity to either (1) sell, lease, license, or contract for service clean school buses, ZE school buses, charging or fueling infrastructure, or other equipment needed to charge, fuel, or maintain clean school buses or zero-emission school buses, to individuals or entities that own, lease, license, or contract for service a school bus or a fleet of school buses; or (2) arrange financing for such a sale, lease, license, or contract for service, but the third-party does not need to actively sell, lease, license, contract for service, or finance either the buses in the application or to the school districts listed in the application. See Question 2.14 for more information on how capacity to sell, lease, license, or contract for service is defined for the purposes of the 2023 CSB Grants.

Date Posted: 8/17/2023

**2.43**: Can multiple eligible contractors work together to submit one Third-Party Sub-Program application?

**Answer:** Multiple eligible contractors cannot submit one Third-Party Sub-Program application where they are all considered direct applicants. Eligible applicants, including Original Equipment Manufacturers (OEMs), dealers, and private fleets, can apply individually and separately enter into a contractual arrangement with a private fleet that owns and operates buses, to replace buses that serve a public school district. EPA is not involved in this contractual arrangement. For example, a dealer could apply through the Third-Party Sub-Program. If selected, the dealer could provide a point-of-sale rebate or otherwise pass funds to the private fleet to replace the buses in that fleet. Please note that EPA can only provide funds to the direct applicant.

Date Posted: 8/17/2023

2.44: Can Independent School Districts that are separate from local governments apply?

**Answer:** Yes, Independent School Districts that are responsible for providing school bus service to one or more public school systems; or the purchase, lease, license, or contract for service of school buses.

Date Posted: 8/17/2023

**2.45**: Are for-profit software companies that provide a software platform to schools to manage charging of their EV buses (e.g., by minimizing electricity charge costs, V2G management, and allow reporting on carbon credits) eligible to apply?

**Answer:** For the 2023 Grants Program, such companies are not eligible to apply; however, school district or third-party applicants could elect to pass funds to such companies through contractual or other business agreements. EPA will not be involved in these agreements. Please note, if awarded a CSB grant, the applicant organization is the entity that will receive the funds and is ultimately responsible for ensuring that program requirements are met.

Date Posted: 8/17/2023

**2.46**: Applications under the Third-Party Sub-Program must serve four "school district beneficiaries." Can a contractor be a beneficiary on a third-party application?

**Answer:** Contractors are not eligible school district beneficiaries. However, school district beneficiaries can enter into a contractual arrangement with a private fleet that owns and operates buses to replace buses that serve a public school district. If selected, funds could be passed from the third-party applicant or the school district beneficiary to the contractor to replace the buses for the school district beneficiary. Please note that EPA can only provide funds to the direct applicant (in this case, the non-contractor third-party). EPA is not involved in this contractual arrangement.

Date Posted: 8/17/2023

**2.47**: Is a non-profit, such as a Boys Club, that is involved in operating a Tribal school system including arranging transportation services, eligible to apply under the School District Sub-Program?

Answer: To be eligible under the School District Sub-Program, the applicant would need to qualify as a local education agency, Indian Tribe (as defined by section 4 of the Indian Self-Determination and Education Assistance Act, 25 U.S.C. 5304), Tribal organization (as defined by the same section), or Tribally-controlled school (as defined by section 5212 of the Tribally Controlled Schools Act of 1988, 25 U.S.C. 2511). A nonprofit applicant, such as the Boys Club, does not appear to qualify as one of these entities. However, the Tribal school district could apply directly under the School District Sub-Program (and the nonprofit can help fill out the application) and then, if awarded, issue a subaward or contract to the nonprofit to purchase the new school buses. Additionally, the nonprofit would be eligible to apply to the Third-Party Sub-Program as an "eligible contractor." Please refer to Section III.A. Eligible Entities of the Notice of Funding Opportunity (NOFO) for more information on "eligible contractors." Note, however, that if the nonprofit applies directly under the Third-Party Sub-Program, it will also be also subject to the four school district beneficiary requirement.

Date Posted: 8/17/2023

#### 2.48: Are Councils of Governments eligible applicants?

Answer: If the Council of Governments is responsible for (1) providing school bus service to one or more public school systems or (2) the purchase, lease, license, or contract for service of school buses, then it is eligible under the School District Sub-Program. If the Council of Governments applies through the School District Sub-Program, it is subject to the same bus minimum (15 buses) and bus maximum (50 buses) requirements as other School District Sub-Program applicants. Because prioritization points are awarded depending on the school districts being served, the Council of Governments should list all school districts being served in their application. Councils of Governments are not eligible applicants under the Third-Party Sub-Program. Councils of Governments that are uncertain about their eligibility may reach out to EPA with additional details on their organization so that EPA may assist with additional review on a case-by-case basis.

Date Posted: 8/17/2023

**2.49**: May an intermediate unit, which is a local education agency (LEA) and a non-profit, submit an application for itself and several of its districts under the Third-Party Sub-Program?

**Answer:** No. These intermediate units should apply under the School District Sub-Program, not the Third-Party Sub-Program. See Question 2.35 for more information on how education service agencies should apply to the 2023 CSB Grants program.

Date Posted: 8/21/2023

**2.50**: Under the Third-Party Sub-Program, what happens if one of five (or more) school district beneficiaries decides not to participate?

**Answer:** These instances will be handled on a case-by-case basis. Third parties must include at least four different school district beneficiaries on their applications and must submit documentation, such as the Third-Party Approval Certification Template, demonstrating that the school districts being served are aware and approve of the third party's application. If a third-party application listed more than four school district beneficiaries but a school district later dropped out, EPA could choose to fund the application for the remaining four or more districts (assuming the application still met the other eligibility requirements, including the 25-bus minimum and signed third-party approval documentation for the remaining four or more districts).

Date Posted: 8/21/2023

# 3. Eligible Existing and New School Buses

3.1: How are school buses defined?

**Answer:** For the 2023 CSB Grants Program, "school bus" is defined as a passenger motor vehicle designed to carry a driver and more than 10 passengers, that the Secretary of Transportation decides is likely to be used significantly to transport preprimary, primary, and secondary school students to or from school or an event related to school.

Date Posted: 6/5/2023

3.2: Are diesel or gasoline buses eligible as the new replacement buses?

**Answer:** No. Replacement buses must have a battery-electric-, CNG-, or propane-drivetrain.

Date Posted: 6/5/2023

**3.3**: What requirements must the existing bus that will be replaced meet?

Answer: Buses to be replaced must:

- 1. Be vehicle model year 2010 or older diesel-powered school buses that will be scrapped if selected for funding. If a fleet has no eligible 2010 or older diesel school buses and is requesting zero-emission school bus replacements, the fleet owner can either:
  - i. Scrap 2010 or older non-diesel internal combustion engine buses; or
  - ii. Scrap, sell, or donate 2011 or newer diesel or non-diesel internal combustion engine buses.
- 2. Have a Gross Vehicle Weight Rating (GVWR) of 10,001 lbs or more.
- 3. Be operational at the time of application submission. Operational vehicles should be able to start, move, and have all necessary parts to be operational.

4. Have provided bus service to a public school district for at least 3 days/week on average during the 2022/2023 school year at the time of applying, excluding COVID-related or disaster-related school closures.

Date Posted: 6/5/2023

**3.4**: What model years are eligible for the replacement bus?

**Answer:** Replacement buses must be a new EPA or California Air Resources Board (CARB) certified vehicle model year 2021 or newer.

Date Posted: 6/5/2023

**3.5**: Is there a mileage requirement for existing buses?

**Answer:** No. Date Posted: 6/5/2023

3.6: Do all replacement buses have to be the same fuel type?

**Answer:** No, grantees may use EPA funds to purchase buses with battery- electric, CNG, and/or propane powertrains, or a combination of these collectively.

Date Posted: 6/5/2023

3.7: Are engine replacements, upgrades, conversions, or retrofits eligible?

**Answer:** No. EPA is not funding the conversion of old school buses to operate on battery-electric, CNG, or propane drivetrains in the 2023 CSB Grants Program.

Date Posted: 6/5/2023

**3.8**: Is a bus already on order eligible as a replacement bus?

**Answer:** No. Buses must not be ordered prior to receiving official notification of selection for EPA funding.

Date Posted: 6/5/2023

3.9: Can new replacement buses be leased or leased-to-own buses?

**Answer:** No. New replacement buses must be purchased, not leased or leased-to-own. Vehicle loans are permitted for the replacement bus purchases, provided that the fleet serving the school district(s) on the application takes title to the bus before the end of the project period.

#### **3.10**: Can buses currently being leased be replaced in the grants program?

**Answer:** Yes. Note, existing buses must still meet all the eligibility requirements listed in the Notice of Funding Opportunity (NOFO). If selected, applicants must ensure the existing buses are replaced according to the program guidance; this includes either scrapping the existing buses, or selling or donating the existing buses based on the requirements listed in the NOFO. The organization leasing the buses will likely need a contractual arrangement with the lessor to ensure the buses are replaced.

Date Posted: 6/5/2023

#### **3.11**: Are school bus classes 3 - 7+ based on weight?

**Answer:** Yes, bus class is determined by their gross vehicle weight rating (GVWR). See the following Alternative Fuels Data Center charts to see the relationship between GVWR and class size:

https://afdc.energy.gov/data/10380#:~:text=These%20classes%2C%201%2D8%2C,(Class%207%2D8).

Date Posted: 6/22/2023

**3.12**: Are emissions from the electrical grid considered in the definition of a zero-emission bus?

**Answer:** No, emissions from the electrical grid are not currently considered under the Clean School Bus 2023 Grant Program. Under this program, a zero-emission school bus is defined as a school bus that produces zero exhaust emissions of any criteria pollutant or greenhouse gas.

Date Posted: 6/22/2023

#### **3.13**: Can we expand our fleet with new buses?

**Answer:** No, funding under this Notice of Funding Opportunity (NOFO) cannot be used for the purchase of vehicles to expand a fleet. Scrappage is a key component of this program as it reduces the number of diesel buses in use, and there is a scrappage requirement for the vast majority of applicants. Applicants with model year 2010 and older diesel buses must scrap a bus for each new replacement bus funded by the Clean School Bus (CSB) Program. Applicants with no model year 2010 or older diesel bus, who are seeking to purchase a ZE bus, may alternatively scrap, sell, or donate (1) a 2010 or older non-diesel internal combustion engine bus or (2) a model year 2011 or newer diesel or non-diesel internal combustion engine bus for each new replacement bus funded by the CSB program.

In a limited number of circumstances, applicants applying through the School District Sub-Program only may request an exception of the bus scrappage requirement at the time of application. EPA will review and approve an exception request of the bus scrappage requirement on a case-by-case basis. To be approved for the waiver, applicants must: (1) be prioritized as low income; AND (2) be seeking to purchase only zero-emission buses; AND (3) be currently contracting with a private fleet that owns school buses for their school transportation services and the school plans to own the new buses; AND (4) attest, in the Budget Detail section of the Project Narrative, that the current contract provider is unwilling or unable to replace buses with zero-emission buses. Third-party applicants are not eligible to apply for this scrappage exception. Please see Section III.D.4.i of the Notice of Funding Opportunity for additional details on fleet expansion limitations.

**3.14**: Is infrastructure subject to Buy America preference requirements under the Build America, Buy America (BABA) Act? Will EPA release a list of all the DC fast chargers (DCFCs) that meet this requirement?

**Answer:** Electric bus charging infrastructure, battery energy storage systems (BESS), or renewable on-site power generation systems that power the buses and equipment are subject to BABA preference requirements. EPA does not maintain a list of all DCFCs that meet BABA requirements at this time. Additionally, EPA is seeking a waiver from BABA requirements for charging infrastructure similar to the waiver recently finalized by the Federal Highway Administration (FHWA)'s National Electric Vehicle Infrastructure (NEVI) Program for electric vehicle chargers. See <a href="https://www.epa.gov/cwsrf/build-america-buy-america-baba-waivers-open-public-comment">https://www.epa.gov/cwsrf/build-america-buy-america-baba-approved-waivers</a>. listed at <a href="https://www.epa.gov/cwsrf/build-america-buy-america-baba-approved-waivers">https://www.epa.gov/cwsrf/build-america-buy-america-baba-approved-waivers</a>.

Date Posted: 6/22/2023

**3.15**: Does this grant provide funding opportunities for idle reduction equipment?

**Answer:** Retrofitting existing school buses with idle reduction equipment is not an eligible activity under the CSB Grant Program. However, replacement buses that meet the eligibility requirements listed in Section III.D of the Notice of Funding Opportunity (NOFO) may include idle reduction equipment. For other grant funding opportunities that allow retrofitting existing school buses with idle reduction equipment, please see <a href="EPA's Diesel Emissions Reduction Act (DERA)">EPA's Diesel Emissions Reduction Act (DERA)</a> grants.

Date Posted: 7/10/2023

**3.16**: Is there an approved vendor list so applicants know which equipment is eligible?

**Answer:** No, EPA does not have a list of approved vendors for eligible equipment. Please see Section III.D in the 2023 CSB Grants Notice of Funding Opportunity (NOFO) for the full list of replacement bus and charging infrastructure eligibility requirements.

Please also note that EPA has determined that although school buses are not covered by the Build America, Buy America Act (BABA), charging infrastructure is covered by BABA. EPA encourages applicants to consider domestically produced buses and charging infrastructure where feasible; in the event that domestically produced charging infrastructure is not available, please note that EPA is seeking a waiver from BABA requirements for charging infrastructure similar to the waiver recently finalized by the Federal Highway Administration (FHWA)'s National Electric Vehicle Infrastructure (NEVI) Program for electric vehicle chargers. Approved BABA waivers, including any potential waivers for charging infrastructure, will be listed at <a href="https://www.epa.gov/cwsrf/build-america-buy-america-baba-approved-waivers">https://www.epa.gov/cwsrf/build-america-buy-america-baba-approved-waivers</a>. Note: if EPA's proposed waiver is approved, the final assembly of electric vehicle chargers must occur in the United States effective immediately upon the date of publication of the waiver. This phase of the waiver would apply to electric vehicle chargers manufactured on or before June 30, 2024.

In addition, EPA does offer a number of resources on our Technical Assistance webpage that could provide helpful information when selecting bus and/or infrastructure equipment (<a href="https://www.epa.gov/cleanschoolbus/charging-and-fueling-infrastructure-resources">https://www.epa.gov/cleanschoolbus/charging-and-fueling-infrastructure-resources</a>). For more individualized assistance, EPA is partnering with the Joint Office of Energy and Transportation (JOET) to provide technical assistance to CSB program participants; please see our technical assistance page for information on how to contact the JOET:

<a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance">https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance</a>.

Date Posted: 7/10/2023

**3.17**: What are the size requirements for replacement buses?

**Answer:** To be eligible, replacement buses must have a Gross Vehicle Weight Rating (GVWR) of 10,001 lbs or more. Note, the per-bus funding amounts, as listed in Table 1 in the 2023 CSB Grants Notice of Funding Opportunity (NOFO), are dependent on several factors including bus class size.

Date Posted: 7/10/2023

3.18: Is a separate garage needed for the maintenance or repair of electric school buses?

**Answer:** Each school district will need to make its own decisions regarding the maintenance and repair of its new school buses.

Date Posted: 7/10/2023

**3.19**: For school buses that meet the scrap, sell, or donation requirements, please clarify if they must have served the specific school district listed in the application, or would serving a school district in same state, in an EPA Region, or nationally also fall under the eligibility requirements?

**Answer:** Per the existing bus eligibility requirements listed in the Notice of Funding Opportunity (NOFO), the existing bus(es) to be replaced must have provided bus service to a public school district for at least three days/week on average during the 2022/2023 school year at the time of applying, excluding COVID-related or disaster-related school closures. These buses may have served a different public school district than the district(s) that will be served by the new buses. The public school district served by the existing bus(es) does not have to be in the same state or EPA Region as the public school district that will be served by the new bus(es). Please see Section III.D of the NOFO for the full list of existing bus eligibility requirements. Also note that the same existing school bus to be replaced cannot appear on multiple applications.

Date Posted: 7/10/2023

**3.20**: Do replacement projects using electric buses receive priority over projects using propane or compressed natural gas (CNG) buses?

**Answer:** No. Please see Section V.A of the 2023 CSB Notice of Funding Opportunity (NOFO) for details on the evaluation criteria that will be used when reviewing applications.

Date Posted: 7/10/2023

**3.21**: Are school fleets made of vehicles other than school buses (known as "white fleets"), eligible for funding?

**Answer:** Applications must include projects which target school buses. For the 2023 CSB Grant Program, "school bus" is defined as a passenger motor vehicle designed to carry a driver and more than 10 passengers, that the Secretary of Transportation decides is likely to be used significantly to transport preprimary, primary, and secondary school students to or from school or an event related to school. School buses being replaced must also meet the eligibility requirements detailed in Section III.D.1 of the Notice of Funding Opportunity (NOFO).

Date Posted: 7/14/2023

#### **3.22**: Can you provide a definition of vehicle loan?

**Answer:** Section III.D of the Notice of Funding Opportunity (NOFO) states, "Funding under this NOFO cannot be used for leasing vehicles or equipment. If financing is necessary, the purchase should be financed with a conventional purchase loan." For the 2023 CSB Grant Program, "vehicle loan" is defined as the amount of money that is borrowed to purchase a vehicle. The title to the vehicle must be in the name of the bus fleet before the end of the project period, but the bus can have a lien on it from the organization making the loan.

Date Posted: 7/14/2023

**3.23**: May buses on a third-party application serve multiple school district beneficiaries or must each school bus serve a single school district beneficiary.

**Answer:** Third-party applicants must replace between 25 and 100 buses—split between at least four school district beneficiaries—but there is no minimum number of buses required per school district beneficiary (as long as the total number of buses for the third-party grant is between 25 and 100). The number of buses and the specific buses serving each school district beneficiary will be determined based on contractual agreement(s) between the third-party applicant and each school district beneficiary listed on the application. EPA is not involved in these contractual arrangements.

Date Posted: 7/14/2023

# **3.24**: Are Electrification as a Service (EaaS) financing models eligible if ownership is not guaranteed?

**Answer:** As stated in Section III.D of the Notice of Funding Opportunity (NOFO), new replacement buses must be purchased, not leased or leased-to-own. However, either the school district or the EaaS service provider may own the new replacement buses. Importantly, for any charges the EaaS provider may pass to the school district for the use of grant-funded equipment (e.g., buses, charging equipment), the EaaS service provider and the school district beneficiary should ensure they have fully reviewed requirements regarding Program Income (refer to <a href="https://example.com/refer to 2.05.4">2.05.8</a> (b), Section G of the Terms and Conditions of this grant program, as well as Q&A 9.a.20)

EaaS providers may thus participate through the Third-Party Sub-Program as an eligible contractor as long as they: 1) meet all other eligibility requirements listed in Section III.A of the NOFO, 2) meet all other program requirements in the NOFO, and 3) comply with all EPA General Terms and Conditions as well as the Terms and Conditions of this Grant Program.

Alternatively, EaaS providers may take part indirectly by having the school district they serve apply through the School District Sub-Program. The school district (which would be the direct applicant and, if selected, would be the entity that receives the funds) could pass funds to the EaaS provider to replace the buses in that fleet; the school district, as the grantee, would then be responsible for complying with all EPA General Terms and Conditions as well as the Terms and Conditions of this Grant Program.

Date Posted: 7/14/2023

**3.25**: Do existing school buses to be replaced need to have provided school bus service from home to school and school to home, or are buses that only provided activity runs eligible for replacement?

**Answer:** All school buses being replaced must meet the same eligibility requirements, including the requirement that the bus has provided bus service to a public school district for at least 3 days/week on average during the 2022/2023 school year at the time of applying, excluding COVID-related or disaster-related school closures. Activity runs qualify as providing bus service provided that the activity runs occurred at least 3 days/week on average during the 2022/2023 school year. A "school bus" is defined as a passenger motor vehicle designed to carry a driver and more than 10 passengers, that the Secretary of Transportation decides is likely to be used significantly to transport preprimary, primary, and secondary school students to or from school or an event related to school. See Section III.D.1 of the Notice of Funding Opportunity (NOFO) for a full list of eligibility requirements for existing buses to be replaced.

Date Posted: 7/14/2023

#### **3.26**: Are 7D or other vans eligible for replacement?

**Answer:** Clean School Bus Funding must be used to replace school buses. For the 2023 CSB Grants, "school bus" is defined as a passenger motor vehicle designed to carry a driver and more than 10 passengers, that the Secretary of Transportation decides is likely to be used significantly to transport preprimary, primary, and secondary school students to or from school or an event related to school. Eligible school buses must also have a Gross Vehicle Weight Rating (GVWR) of 10,001 lbs. or more, in addition to meeting all other eligibility requirements for existing school buses to be replaced listed in Section III.D.1 of the Notice of Funding Opportunity (NOFO).

Date Posted: 7/14/2023

**3.27**: Can grants be used to repower existing Reciprocating Internal Combustion Engines (RICE) buses to convert them to electric?

**Answer:** No, funding under this Notice of Funding Opportunity (NOFO) is only for newly manufactured school buses and cannot be used to convert existing vehicles driven by internal combustion engines.

Date Posted: 7/14/2023

#### **3.28**: Is funding available for automatic fire suppression systems?

**Answer:** Clean School Bus (CSB) funds may not be used to retrofit existing buses with automatic fire suppression systems, but new buses purchased through the CSB program may include automatic fire suppression systems. The CSB program is a bus replacement program; CSB funds may be used to replace existing school buses and install charging infrastructure.

Date Posted: 7/20/2023

**3.29**: Is biodiesel different than regular diesel and gasoline? Are biodiesel buses eligible as the existing bus to be replaced? Are biodiesel buses eligible as the new replacement buses?

**Answer:** Biodiesel is a renewable fuel made from plant or animal oils that can be used as a substitute for petroleum-based diesel fuel. Existing buses to be replaced must have diesel or non-diesel internal combustion engines. This includes bio-diesel buses. Please see Question 3.3 for more details on existing bus requirements, including model year requirements.

Biodiesel buses are not eligible as new replacement buses. Replacement buses must have a battery-electric-, CNG-, or propane-drivetrain. Please see Section III.D of the Notice of Funding Opportunity (NOFO) for more information on new replacement bus requirements. EPA knows of no unique biofuels engines or buses at this time. Diesel buses can run on a mix of regular diesel and biodiesel, making it very difficult to ensure that biofuel blends of a certain percentage are used exclusively in the vehicle from the start, much less over the vehicle's lifetime. There are no differences in emissions standards between a regular diesel bus and one that may use biofuels as an in-use fuel.

Date Posted: 8/17/2023

**3.30**: When will funding be available to repower buses (i.e., replace a diesel engine with an electric motor and batteries)?

**Answer:** Funding for repowered school buses is not eligible under the 2023 Clean School Bus Grant Program. EPA takes feedback into account for future programs; announcements about future funding opportunities will be available on the <u>CSB website</u> and through our <u>listserv</u>.

Date Posted: 8/21/2023

**3.31**: Why must the existing school buses to be replaced and the replacement school buses have Gross Vehicle Weight Ratings (GVWR) of at least 10,001 lbs?

**Answer:** School buses must be Class 3-7+ to be eligible for replacement under the Clean School Bus program. The Federal Highway Administration defines vehicle weight classes; a Class 3 heavy-duty vehicle must have a GVWR of 10,001 lbs or more.

Date Posted: 8/21/2023

**3.32**: What documentation is needed to demonstrate that existing buses to be replaced meet usage requirements?

**Answer:** By signing the application, applicants are certifying that the vehicles meet all eligibility requirements. No additional documentation is needed to demonstrate usage at the time of application. If selected for funding, applicants will have to attest to details of the buses to be replaced in a signed eligibility statement, including certifying that the buses meet usage requirements.

**3.33**: How should applicants calculate the remaining life of baseline engine/vehicle? Should applicants use a depreciation schedule?

**Answer:** Remaining life is the fleet owner's estimate of the number of years until the unit would have been retired from service if the unit were not being replaced through the grant funding. The remaining life estimate depends on the current age and condition of the vehicle at the time of upgrade, as well as factors such as usage, maintenance, and climate. Please provide your best estimate given these considerations.

Date Posted: 8/21/2023

**3.34**: Is there a list of compatible chargers and buses?

**Answer:** No, EPA does not maintain such a list. However, EPA does offer a number of resources on our Technical Assistance webpage that could provide helpful information when selecting bus and/or infrastructure equipment. For more individualized assistance, EPA is partnering with the Joint Office of Energy and Transportation (JOET) to provide technical assistance to CSB program participants, including information and tools needed to successfully plan and deploy clean school buses and infrastructure; please see our technical assistance page for information on how to contact the JOET: <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance">https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance</a>.

Date Posted: 8/21/2023

**3.35**: May a school district move an eligible existing bus to be replaced to its spare/backup fleet (i.e., not used in daily operations) and scrap an older diesel bus from the backup fleet?

Answer: The Clean School Bus (CSB) Program requirements state that the existing bus being replaced must have provided bus service to a public school district for at least 3 days/week on average during the 2022/2023 school year at the time of applying, excluding COVID-related or disaster-related school closures. This requirement is in place to ensure that buses being replaced are in regular service and therefore the project will achieve the intended emissions reductions. Program requirements also state that applicants must (depending on model year) scrap, sell, or donate the existing bus to be replaced, unless the school district applies for and receives a waiver of the bus scrappage requirement (see Questions 8.1 and 8.2). If the older diesel bus from the backup fleet meets the eligibility requirements (e.g., has provided bus service to the public school district for at least 3 days/week on average), then the school district could scrap the backup bus and move a different bus into the backup fleet.

Date Posted: 8/21/2023

**3.36**: Do buses listed to be replaced need to meet all eligibility requirements listed in Section III.D.1 of the Notice of Funding Opportunity (NOFO) until the date of scrappage (i.e., be operational, served the district for at least 3 days per week, etc.)?

**Answer:** The buses listed to be replaced must meet all existing school bus eligibility requirements listed in Section III.D.1 of the NOFO at the time of application submission.

**3.37**: Are retrofitted buses that are "new" off the production line eligible as new replacement buses?

**Answer:** Newly manufactured buses that meet all applicable federal safety requirements and have received a CARB Executive Order (EO) are eligible for funding under the 2023 CSB Grants Program. As stated in Section III.D of the NOFO, all replacement vehicles must also be maintained, operated, insured, registered, and charged/fueled according to manufacturer recommendations and state requirements.

Date Posted: 8/21/2023

**3.38**: Is a repowered bus eligible as a replacement bus?

**Answer:** Replacement electric buses funded under the 2023 CSB Grant Program must be a newly manufactured, model year 2021 or later vehicle certified by EPA or CARB to have a drivetrain that produces, under any possible operational mode or condition, zero exhaust emissions. Older buses manufactured with an internal combustion engine and then driven for a period of time prior to converting the bus to electric are not eligible for funding in the 2023 CSB Grants Program.

Date Posted: 8/21/2023

**3.39**: Can applicants purchase demo buses from dealers through the Clean School Bus Program?

**Answer:** Yes, demo buses are eligible to be purchased as replacement buses as long as they meet the replacement bus requirements laid out in Section III.D.2.a of the Notice of Funding Opportunity.

Date Posted: 12/21/2023

**3.40**: If a bus identified in an application for replacement no longer is available, can a school district swap in a different eligible bus?

**Answer:** Yes. EPA can work with grant recipients on a case-by-case basis. Please email your EPA Project Officer with the following information:

- 1. Applicant organization name
- School district name
- 3. Explanation for requesting buses be swapped
- 4. Last 4 digits of VINs of old buses to be swapped out
- 5. Last 4 digits of VINs of old buses to be swapped in for replacement
  - a. Fuel type of each swapped in bus
  - b. Vehicle model year of each swapped in bus
  - c. Yes/no confirmation that you have a vehicle title for each bus

If the bus swap is approved by the Project Officer, the grantee will update the information for the old bus(es) swapped in to be replaced in the reporting template.

Date Posted: 1/29/2024

### 4. Prioritization

**4.1**: How do applications serving prioritized school districts receive preference in the selection process? Are applications serving prioritized school districts eligible for more funding?

**Answer:** Applications serving prioritized school districts will receive points under the Evaluation Criteria in Section V.A of the Notice of Funding Opportunity (NOFO) for including prioritized school districts. Third-party applications, which must include at least four school districts, will receive prioritization points based on the number of buses in the grant serving prioritized school districts. Additionally, the per-bus funding level for each class and fuel type of bus is higher for buses serving school districts that meet one or more prioritization criteria (see Table 1 in Section II.A of the NOFO).

Date Posted: 6/5/2023

### **4.2**: Which applicants are prioritized for the 2023 CSB Grant Program?

**Answer:** Applicants requesting funds for new school buses that will serve a school district that meets one or more of the prioritization criteria below will be offered more funding per bus and receive points in the selection process. EPA offers equal prioritization for school districts that meet one or multiple prioritization criteria.

- 1. High-need school districts and low-income areas, limited to:
  - a. School districts listed in the <u>Small Area Income and Poverty Estimates (SAIPE)</u>
    <u>School District Estimates for 2021</u> as having 20% or more students living in poverty.
  - b. Title I-funded school districts and charter school districts not listed in the SAIPE dataset. See the Prioritization Self-Certification Instructions, which can be found on the <u>CSB Grants webpage</u>, for more information on this option.
  - c. Title I-funded large public-school districts, defined as districts with more than 35,000 students and/or 45 public schools, that are in SAIPE but do not meet the 20% poverty threshold, may be eligible to self-certify their low-income prioritization status for part or all of their district. See the Prioritization Self-Certification Instructions, which can be found on the <a href="CSB Grants webpage">CSB Grants webpage</a>, for more information on this option.
  - d. School districts located in the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.
- 2. Rural school districts, limited to school districts identified with locale code "43-Rural: Remote" by the <u>National Center for Education Statistics (NCES)</u>.
- 3. Bureau of Indian Affairs-funded school districts
- 4. School districts that receive basic support payments under section <u>7703(b)(1) of title 20</u> for children who reside on Indian land.

School districts that qualify under one or more prioritization criteria above, except for 1.b and 1.c, are identified in EPA's Prioritized School District List, found on the <u>CSB Grants webpage</u>.

Third-party applicants will receive prioritization points based on the number of buses in the grant serving prioritized school districts. Applicants that self-certify will receive the same points under the prioritization evaluation criterion as those identified on the Prioritized School District List, and the same opportunity for a greater amount of funding per bus if the application is selected for funding.

**4.3**: If my school falls under two prioritized categories, will I receive preference over schools with only one prioritized category?

**Answer:** No. School districts that meet one or more of the prioritization criteria listed in the Notice of Funding Opportunity (NOFO) are equally prioritized.

Date Posted: 6/5/2023

### **4.4**: What school districts are prioritized as rural?

**Answer:** School districts identified with locale code "Rural – Remote (43)" by the National Center for Education Statistics (NCES) are prioritized as rural in the 2023 CSB Grant Program. Locale codes can be found by searching for the school district at the following website: <a href="https://nces.ed.gov/ccd/districtsearch/">https://nces.ed.gov/ccd/districtsearch/</a>.

Date Posted: 6/5/2023

### **4.5**: What is the definition of the prioritized rural locale code 43?

**Answer:** The National Center for Education Statistics (NCES) defines "Rural – Remote (43)" as a census-defined rural territory that is more than 25 miles from an Urbanized Area and also more than 10 miles from an Urban Cluster. Please see

https://nces.ed.gov/programs/edge/Geographic/LocaleBoundaries for more information.

**4.6**: How has the prioritization criteria for the 2023 CSB Grant Program changed from the 2022 CSB Rebate Program?

**Answer:** In the 2022 CSB Rebate Program, EPA published a list of prioritized districts. This list included all districts prioritized as low-income, rural, Bureau of Indian Affairs-funded, or receiving basic support payments under title 20 section 7703(b)(1) for children residing on Indian land. School districts were allowed to self-certify as low-income if they were not listed in the Small Area Income and Poverty Estimates (SAIPE) dataset and therefore EPA could not confirm the 20% threshold; however, EPA did not identify a specific dataset for of self-certification.

In the 2023 CSB Grant Program, EPA will continue to use SAIPE to determine which districts have student poverty rates at 20% or higher. However, we are also expanding the group of applicants that can self-certify their poverty status and are specifying the SAIPE alternative that districts should use to self-certify. The following districts may be eligible to self-certify their low-income prioritization status: (1) Title I funded districts that do not have SAIPE data OR (2) Title I funded very large school districts (more than 45 schools or more than 35,000 students). Districts in either of these categories may self-certify their prioritization status. Very large school districts (as described in the second category) may either: (A) apply on behalf of Title I sub-districts or individual schools if buses would be used primarily for those Title I schools/sub-districts OR (B) apply for the entire district if that district is at least 80% Title I schools. Please see the Prioritization Self-Certification Instructions on the CSB Grants website for more information on which districts are eligible for self-certification and how to self-certify districts on your application.

Additionally, in the 2022 CSB Rebate Program, school districts were prioritized as rural if they were classified under National Center for Education Statistics (NCES) locale codes "Rural – Distant (42)" or "Rural – Remote (43)." In the 2023 CSB Grant Program, EPA is only prioritizing school districts as rural if they are classified under the NCES locale code "Rural – Remote (43)."

Note also, in the 2022 Rebate Program, we used NCES, SAIPE, Bureau of Indian Affairs, and Bureau of Indian Education data for the 2020-2021 school year. For the 2023 CSB Grants Program, we are using data for the 2021-2022 school year.

Date Posted: 6/5/2023

**4.7**: Why did EPA change the prioritization criteria from the 2022 CSB Rebate Program for rural districts?

**Answer:** EPA received significant feedback on the 2022 CSB Rebate Program prioritization; based on that feedback, for the 2023 CSB Grant Program, only districts with National Center for Education Statistics (NCES) locale code "Rural – Remote (43)" will be prioritized as rural.

**4.8**: Will EPA continue to use the SAIPE School District data from 2020, or will updated datasets be used (e.g., 2021, 2022, etc.)?

**Answer:** The 2022 Clean School Bus Rebates relied on the Census' 2020 SAIPE School District data to identify high-need school districts that met the 20% poverty threshold for prioritization. The 2023 Clean School Bus Grants uses the Census' 2021 SAIPE School District data. Future funding programs under Clean School Bus may rely on different data/thresholds, and that information will be published as those funding programs are published.

Date Posted: 6/5/2023

**4.9**: If a school district is not identified as a prioritized school district, can they appeal for reconsideration?

**Answer:** No. However, an applicant may be able to self-certify the low-income prioritization status of the school district(s) being served are (1) Title I funded and do not have SAIPE data OR (2) Title I funded and very large (defined as having more than 45 schools or more than 35,000 students). Very large school districts (as described in the second category) may either: (A) apply on behalf of Title I sub-districts or individual schools if buses would be used primarily for those Title I schools/sub-districts OR (B) apply for the entire district if that district is at least 80% Title I schools. See the Prioritization Self-Certification Instructions, which can be found on the CSB Grants webpage, for details on these options.

Note: Applicants are not able to self-certify that school districts are prioritized under the other prioritization categories (rural, Bureau of Indian Affairs-funded, or receiving basic support payments for children residing on Indian land).

Date Posted: 6/5/2023

**4.10**: If a school district is not identified in EPA's Prioritized List, what is the process to self-certify their prioritization status?

**Answer:** An applicant may be eligible to self-certify the school district's low-income prioritization status if the district is (1) Title I funded and does not have SAIPE data OR (2) Title I funded and very large (defined as having more than 45 schools or more than 35,000 students). Very large school districts (as described in the second category) may either: (A) apply on behalf of Title I sub-districts or individual schools if buses would be used primarily for those Title I schools/sub-districts OR (B) apply for the entire district if that district is at least 80% Title I schools. See the Prioritization Self-Certification Instructions, which can be found on the <u>CSB Grants webpage</u>, for details on these options.

Note: Applicants are not able to self-certify that school districts are prioritized under the other prioritization categories (rural, Bureau of Indian Affairs-funded, or receiving basic support payments for children residing on Indian land).

**4.11**: If a school district is listed on the Self-Certifiable Districts list, is it automatically considered prioritized?

**Answer:** No, districts on the self-certifiable list are not automatically prioritized. The school districts on the Self-Certifiable Districts list are those that are either not in SAIPE or are large enough to be eligible for self-certification (meaning they have more than 45 schools and/or more than 35,000 students). If these districts are Title I funded, they may self-certify on their application and receive prioritization points. Not all districts on the list are Title-I funded. Please see the Prioritization Self-Certification Instructions for more information.

Date Posted: 6/5/2023

**4.12**: Will applicants that self-certify their low-income priority status be awarded the same number of points as other priority school districts during application evaluation?

**Answer:** Yes. Applicants that properly self-certify will receive the same number of points under the prioritization evaluation criterion as those identified on the Prioritized District List and the same opportunity for a greater amount of funding per bus if the application is selected for funding.

Date Posted: 6/5/2023

**4.13**: How are evaluation criteria points for prioritized school districts calculated for third-party applications with a combination of prioritized and non-prioritized districts?

**Answer:** Third-party applicants will receive prioritization points based on the number of buses in the grant serving prioritized school districts.

Date Posted: 6/22/2023

**4.14**: Are school districts able to self-certify in advance of submitting a complete application to determine if they will receive prioritization?

**Answer:** No, schools self-certify by filling out and submitting the entire application. See the Prioritization Self-Certification Instructions, which can be found on the <u>Clean School Bus (CSB)</u> <u>Grants webpage</u>, for more information on this option. Please refer to Questions 4.10 and 4.12 for more details.

Date Posted: 6/22/2023

**4.15**: Does a school district qualify for prioritization self-certification even if only some of their schools received Title I funding?

Answer: School districts not already on the Prioritized Districts List that have one or more Title 1 funded schools may be eligible to self-certify their low-income prioritization status if they are: (1) Title I funded districts that do not have SAIPE data OR (2) Title I funded very large school districts (more than 45 schools or more than 35,000 students). Districts in either of these categories may self-certify their prioritization status. Very large school districts (as described in the second category) may either: (A) apply on behalf of Title I sub-districts or individual schools if buses would be used primarily for those Title I schools/sub-districts OR (B) apply for the entire district if that district is at least 80% Title I funded schools. Please see the Prioritization Self-Certification Instructions on the <a href="CSB Grants website">CSB Grants website</a> for more information on which districts are eligible for self-certification and how to self-certify districts on your application.

**4.16**: Are there any prioritization considerations for rural or Tribal communities that don't have the population density of metropolitan areas or suburbs?

**Answer:** Yes. Prioritization criteria in the 2023 CSB Notice of Funding Opportunity (NOFO) include: (1) high-need local educational agencies, (2) rural school districts, (3) Bureau of Indian Affairs-funded school districts, and (4) school districts that receive basic support payments for children who reside on Indian land.

Date Posted: 7/10/2023

**4.17**: What percentage of rural communities will be considered priority in 2023 compared to 2022?

**Answer:** EPA does not currently maintain a comparison list of the prioritized districts in different years or funding programs. However, current and historical Excel files with the full list of districts prioritized under the Rural categorization may be found on the <a href="#">CSB Rebate website</a> and the <a href="#">CSB Grants website</a>.

Date Posted: 7/10/2023

**4.18**: Under the Third-Party Sub-Program, do all of the school district beneficiaries have to qualify under one or more prioritization criteria?

**Answer:** There is no requirement that any or all school districts in a Third-Party Sub-Program application be prioritized school districts. However, third-party applicants will receive points in the evaluation process based on the number of buses in the grant serving prioritized school districts.

Date Posted: 7/10/2023

**4.19**: Does EPA plan to incorporate pollution burden (rather than just income) into the criteria for determining prioritized school districts? Would they consider using the EPA EJScreen tool when creating the criteria in future CSB funding opportunities?

**Answer:** The 2023 CSB Grants Program criteria for "disadvantaged communities" is drawn from the prioritization criteria described in the CSB statute. While the prioritization criterion described in the statue does not include pollution burden, under the Project Location - Nonattainment or Maintenance Area evaluation criterion, applicants will be awarded points if the proposed project is located in an Ozone or PM2.5 nonattainment or maintenance area. The methodology for prioritizing disadvantaged communities may be updated in the future as additional funding opportunities are offered under the program and EPA receives input on previous funding opportunities.

Date Posted: 7/14/2023

**4.20**: Is there a set percentage of funds that will be awarded to non-prioritized schools districts?

**Answer:** No, applications will be evaluated using the evaluation criteria in Section V.A of the Notice of Funding Opportunity (NOFO).

**4.21**: Is there a Title I threshold for applicants self-certifying their low-income prioritization status?

**Answer:** Applicants may be eligible to self-certify a school district's low-income prioritization status if the district is Title I funded and is either (1) not represented in the U.S. Census Bureau's <u>Small Area Income and Poverty Estimates (SAIPE)</u> School District Estimates for 2021 OR (2) very large (defined as having more than 45 schools or more than 35,000 students).

There is no Title I "threshold" percentage for self-certifying districts without SAIPE data (the first category). Very large school districts (as described in the second category) may either: (A) apply on behalf of Title I sub-districts or individual schools if buses would be used primarily for those Title I schools/sub-districts OR (B) apply for the entire district if that district is at least 80% Title I schools. See the Prioritization Self-Certification Instructions, which can be found on the CSB Grants webpage, for details on these options.

EPA may verify applicants' certification of Title I funding. In order to assist and streamline that process, applicants may submit a copy of an official letter from State educational agency (SEA) indicating division-level Title I award(s) for the 2021/2022 academic year. Applicants are not required to submit this documentation and applicants that do submit this documentation will not receive additional points for it.

Applicants that properly self-certify will receive the same points under the prioritization evaluation criterion as those identified on the Prioritized District List, and the same opportunity for a greater amount of funding per bus if the application is selected for funding.

Date Posted: 7/14/2023

**4.22**: Will funds be targeted to parts of the United States that have more smog related issues?

**Answer:** Applicants are evaluated based on the criteria defined in Section V.A of the Notice of Funding Opportunity (NOFO). Specifically, under the Project Location - Nonattainment or Maintenance Area evaluation criterion, applicants are awarded points if the proposed project is located in an Ozone or PM2.5 nonattainment or maintenance area.

Date Posted: 7/14/2023

4.23: What is the difference between a prioritized school district and disadvantaged community?

**Answer:** There is no difference; for the purposes of this funding opportunity, "disadvantaged communities" are those that meet one of the prioritization criteria.

Date Posted: 7/14/2023

**4.24**: Is prioritization at the school district level or also the school level?

**Answer:** Prioritization is determined at the school district level, unless a large school district (defined as districts with more than 35,000 students and/or more than 45 public schools) is self-certifying a sub-group of schools within the district. Please see Question 4.10 for more information about self-certification.

**4.25**: What are the National Ambient Air Quality Standards (NAAQS) and nonattainment or maintenance areas?

Answer: EPA sets NAAQS for six common air pollutants, including particulate matter (PM), photochemical oxidants (including ozone), carbon monoxide, sulfur oxides, nitrogen oxides, and lead. Nonattainment areas are areas of the country that do not meet these national air quality standards. The counties on the Priority Area List are areas that were identified as priority locations because they are designated, as of the release date of the Notice of Funding Opportunity, as Nonattainment Areas or Maintenance Areas for the NAAQS for PM 2.5 and Ozone. The Priority Area List of counties that have been designated as nonattainment or maintenance areas for these NAAQS can be found at <a href="https://www.epa.gov/system/files/documents/2023-04/fy23-csb-grant-priority-area-list-2023-04.pdf">https://www.epa.gov/system/files/documents/2023-04/fy23-csb-grant-priority-area-list-2023-04.pdf</a>.

Date Posted: 8/17/2023

**4.26**: The Notice of Funding Opportunity (NOFO) states "Applicants that self-certify at least one school district not listed on the Prioritized School District List as "low-income" may choose to submit optional documentation of their Title I funding, as described in the Prioritization Self-Certification Instructions. Applicants are not required to submit this documentation and applicants that do submit this documentation will not receive additional points for it." Please clarify why the applicant will not receive additional points.

**Answer:** Applicants that properly self-certify will receive the same points under the prioritization evaluation criterion as those identified on the Prioritized District List, whether or not they submit additional documentation showing Title 1 status. This documentation is intended only to assist and streamline the process for EPA to verify Title 1 status, but it is not required.

Date Posted: 8/21/2023

**4.27**: Will school districts receive prioritization and/or points for serving students who live within a disadvantaged community, even if the school itself is not located in a disadvantaged community?

**Answer:** Applications serving prioritized school districts will receive points under the Evaluation Criteria in Section V.A of the Notice of Funding Opportunity (NOFO) for including prioritized school districts. Prioritized districts are those that are listed on the Prioritized School Districts List (or those eligible to self-certify their prioritization status). See Questions 4.2, 4.9, and 4.10 for more information on prioritization. Note, some prioritized categories are related to the students that attend the school, rather than the school's location (e.g., whether the district receives basic support payments for children residing on Indian land). Third-party applications, which must include at least four school district beneficiaries, will receive prioritization points based on the number of buses in the grant serving prioritized school districts.

**4.28**: Can both School District Sub-Program and Third-Party Sub-Program applicants self-certify school districts?

**Answer:** Yes, applicants from both sub-programs are able to self-certify eligible districts. Please see <u>Prioritization Self-Certification Instructions</u>, as well as Questions 4.9 and 4.10, for more information on which districts can self-certify and how to self-certify. Applicants that self-certify school districts will receive the same points under the prioritization evaluation criterion as those identified on the Prioritized School District List, and the same opportunity for a greater amount of funding per bus if the application is selected for funding.

Date Posted: 8/21/2023

**4.29**: What documentation will be accepted for applicants that choose to self-certify a school district as prioritized?

Answer: As explained in the Prioritization Self-Certification Instructions, EPA may verify applicants' certification of Title I funding. In order to assist and streamline that process, applicants may submit an official document certifying which schools within the school district received Title I funding for the 2021/2022 academic year. For applicants self-certifying under Category 1 (public school districts not represented in SAIPE), documentation may include a copy of official letter from the State educational agency (SEA) indicating division-level Title I award(s) for the 2021/2022 academic year. For applicants self-certifying under Category 2 (school districts with more than 35,000 students or more than 45 schools), documentation may include an official document certifying which schools within the school district received Title I funding for the 2021/2022 academic year. If the applicant is applying under Option 2A, selfcertifying the entire district, they may indicate (1) the number of schools within the district and (2) the number of Schools in 2021/2022 Academic Year that received Title I funding. If the applicant is applying under Option 2B, on behalf of a subgroup of schools within the district, they may indicate which schools the buses will primarily serve (for example, rows or school names may be highlighted). Please note, applicants are not required to submit this documentation and applicants that do submit this documentation will not receive additional points for it. If applicants wish to submit documentation, it should be submitted as part of the 2023 CSB grant application package to www.Grants.gov.

Date Posted: 8/21/2023

**4.30**: Will school districts that need school buses with wheelchair lifts receive priority as "highneed" districts?

**Answer:** No. For the 2023 CSB Grants, "high-need and low-income areas" are defined as:

- 1. School districts listed in the Small Area Income and Poverty Estimates (SAIPE) School District Estimates for 2021 as having 20% or more students living in poverty.
- 2. Title I-funded school districts and charter school districts not listed in the SAIPE dataset.
- 3. Title I-funded large public-school districts, defined as districts with more than 35,000 students and/or 45 public schools, that are in SAIPE but do not meet the 20% poverty threshold, may be eligible to self-certify their low-income prioritization status for part or all of their district.
- 4. School districts located in the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.

EPA continues to review stakeholder feedback on the prioritization criteria used in the 2023 Grants Program and may make adjustments in future funding opportunities as appropriate to address program goals.

Date Posted: 12/21/2023

# 5. Funding Amounts and Eligible Costs

5.1: What is the funding amount per bus?

**Answer:** The maximum grant amount per bus is dependent on (1) the replacement bus fuel type, (2) the replacement bus size, and (3) whether the school district(s) that will be served by the buses meets one or more prioritization criteria. For specific per-bus funding amounts, please see Table 1 in Section II.A of the Notice of Funding Opportunity (NOFO).

Date Posted: 6/5/2023

**5.2**: Is funding available for charging infrastructure?

Answer: Yes. The per-bus funding amounts listed in Table 1 in Section II.A of the Notice of Funding Opportunity (NOFO) represent combined bus-infrastructure funding amounts. Recipients have flexibility to determine the split between funding for the bus itself and the supporting infrastructure. EPA funding for infrastructure is limited to installations between the electrical meter and the charging port. This can include, but is not limited to, charging equipment (such as AC Level 2 charging equipment or direct-current fast charging equipment), design and engineering, and installation costs such as trenching, wiring and electrical upgrades, labor, and permitting. EPA funds must not be used for any infrastructure costs associated with work on the utility's side of the electrical meter. All AC Level 2 charging infrastructure purchased under this program must be EPA ENERGY STAR certified at the time of purchase. See Section III.D for eligible charging infrastructure costs and other charging infrastructure requirements.

Date Posted: 6/5/2023

**5.3**: Is funding available for propane or CNG fueling infrastructure in the 2023 Clean School Bus Grants?

Answer: No.

Date Posted: 6/5/2023

**5.4**: If a replacement electric school bus costs less than the maximum per-bus funding amount, can the remaining funds be used for charging infrastructure costs?

**Answer:** Yes. The per-bus funding amounts listed in Table 1 in Section II.A of the Notice of Funding Opportunity (NOFO) represent combined bus-infrastructure funding amounts. Recipients have flexibility to determine the split between funding for the bus itself and the supporting infrastructure. Note, the total of funds from the CSB grant and other eligible external funds allocated for the bus replacements and charging infrastructure cannot exceed the cost of the new buses and charging infrastructure.

**5.5**: Is there a cost sharing or matching fund requirement for this grant program?

**Answer:** No, cost sharing or matching is not required under this funding opportunity. However, EPA will award evaluation points to applicants that demonstrate that they have leveraged or plan to leverage additional external funds in order to support the proposed project activities, such as public-private partnerships, grants from other entities, or the issuance of school bonds.

Date Posted: 6/5/2023

**5.6**: Can federal tax credits (e.g., IRA 30C and 45W) be used on the replacement bus and charging infrastructure funded by 2023 Clean School Bus Grant funds?

**Answer:** A tax credit would not trigger the 2023 CSB Grant Program prohibition regarding stacking funds from federal incentive programs. Please monitor the IRS website for further guidance around how to claim or receive any tax credits.

Date Posted: 6/5/2023

**5.7**: Are funds available for costs on the utility's side of the electric meter?

**Answer:** EPA funds must not be used for any infrastructure costs associated with work on the utility's side of the electrical meter. EPA recommends reaching out to your utility for more information on the support they can offer on this work. State and other local funding may also be available for this work.

Date Posted: 6/5/2023

5.8: Is the cost of an electrician to install a charger for electric buses an eligible cost?

Answer: Yes, installation costs, including the cost of an electrician, are eligible costs. Note, all electricians installing, operating, or maintaining CSB-funded EVSE must meet one of the following requirements: (i) Certification from the Electric Vehicle Infrastructure Training Program (EVITP), OR (ii) Graduation or a continuing education certificate from a registered apprenticeship program for electricians that includes charger-specific training and is developed as a part of a national guideline standard approved by the Department of Labor in consultation with the Department of Transportation. For projects requiring more than one electrician, at least one electrician must meet the requirements above, and at least one electrician must be enrolled in an electrical registered apprenticeship program. In limited circumstances, EPA may provide an exception to the above requirements for grantees that can demonstrate there are no electricians meeting the above requirements available in their area, and that efforts to train local electricians to meet the requirements are not feasible (see details in Section III.D of the Notice of Funding Opportunity (NOFO)). Eligible costs can include training to certify licensed electricians to install EVSE, such as certification through the Electric Vehicle Infrastructure Training Program (EVITP).

Date Posted: 6/5/2023

**5.9**: Can grantees purchase more than one charger with their allotted charging infrastructure funds?

Answer: Yes.

Date Posted: 6/5/2023

**5.10**: What is the cost of an electric bus? What is the mileage range?

**Answer:** EPA is partnering with The Joint Office of Energy and Transportation and the National Renewable Laboratory to offer clean school bus technical assistance to school districts, including information and tools needed to successfully plan and deploy clean school buses and infrastructure. Potential applicants can contact the JOET for technical assistance via the link on EPA's website: <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance">https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance</a>.

In addition, while not an EPA source, the World Resources Institute has a document that includes tables showing some electric school bus models with pricing estimates and mileage ranges here: <a href="https://www.wri.org/research/electric-school-bus-us-market-study-and-buyers-guide-resource-school-bus-operators">https://www.wri.org/research/electric-school-bus-us-market-study-and-buyers-guide-resource-school-bus-operators</a>.

Date Posted: 6/5/2023

**5.11**: Is infrastructure required or may we apply only for funding for buses?

**Answer:** Applicants may apply just to replace school buses and may choose not to include any charging infrastructure on their application.

Date Posted: 6/22/2023

**5.12**: Why did funding increase for propane school buses from the 2022 CSB Rebates?

**Answer:** EPA received significant feedback on the 2022 CSB Rebate Program funding levels; based on that feedback, for the 2023 CSB Grant Program, EPA has increased the per-bus funding limits for propane-fueled school buses.

Date Posted: 6/22/2023

**5.13**: Are the funding limits in Table 1 of the 2023 CSB Grants Notice of Funding Opportunity (NOFO) the funding limit for each bus or for all buses?

**Answer:** Table 1 lists the funding limits per bus. The per-bus funding amount is dependent on bus fuel type, bus class size, and the prioritization status of the school district being served by the bus. Funding for buses and charging infrastructure can be pooled. For example, an applicant applying for 15 ZE Class 7+ school buses to serve a prioritized district may apply for up to a total of \$5,925,000 (i.e., 15 \* \$395,000) for all buses and charging infrastructure. Recipients have the flexibility to determine how to split this funding between buses and charging infrastructure. Note, funding beyond the per-bus levels is also available for project implementation costs (i.e., costs directly related to the implementation, management, and oversight of the project; see Section III.D.4.b of the NOFO). See Question 5.18 and 5.35 for additional information on which costs are subject to the per-bus funding limits and which costs are eligible project implementation costs.

**5.14**: Can grantees stack funds from other sources (e.g., third-party and tax credits) to the funding awarded from the 2023 Clean School Bus grants?

**Answer:** You may stack state or local funds with Clean School Bus funds. Note, new replacement buses purchased with CSB Grant funds be must not purchased or otherwise subsidized with other federal grant funds. Fleets can use external non-federal funding sources as part of their bus replacement project but must confirm with the source of those funds that they are not pass-through federal funds. A tax credit would not trigger the 2023 CSB Grant Program prohibition regarding stacking funds from federal incentive programs. Please monitor the IRS website for further guidance around how to claim or receive any tax credits. Please refer to Question 5.5 for additional details on leveraging additional external funds in the 2023 CSB Grant Program.

Date Posted: 6/22/2023

**5.15**: Can eligible charging infrastructure costs be leased or financed?

**Answer:** Funding under this Notice of Funding Opportunity (NOFO) cannot be used for leasing vehicles or equipment. If financing is necessary, the purchase should be financed with a conventional purchase loan.

Date Posted: 6/22/2023

**5.16**: Is sales tax on buses and charging infrastructure an eligible expense?

**Answer:** Yes.

Date Posted: 7/10/2023

**5.17**: Can Impact Aid funds be stacked with Clean School Bus funds?

**Answer:** Impact aid funds are considered other federal grant funds. New replacement buses and, if applicable, charging infrastructure for electric school buses purchased with CSB Grant funds, must not be purchased or otherwise subsidized with other federal grant funds. However, Impact Aid funds may be treated as leveraged additional external funds, as defined in Section III.B of the Notice of Funding Opportunity (NOFO) and may be spent on non-bus and non-CSB funded infrastructure costs.

Leveraged additional external funds may be used in coordination with CSB grant funds and do not need to be spent on eligible or allowable costs as listed in Section III.D Project Requirement. Please note, these funds should not be included in the total project cost of the assistance agreement on the SF 424 and SF 424-A forms but should be included in the project narrative budget table.

In addition, applications cannot include any costs in their CSB NOFO application that are included as a cost of any other federally financed grant, as required under 2 CFR 200.403(f).

**5.18**: The Notice of Funding Opportunity (NOFO) provides funding levels for buses/chargers, but renewable on-site power generation systems and battery energy storage systems (BESS) are also eligible costs. Can funding beyond the per-bus levels be requested?

**Answer:** Funding beyond the per-bus levels is available for project implementation costs, such as administrative costs (see Section III.D.4.b of the NOFO). However, renewable on-site power generation systems and BESS are both considered part of the charging equipment and are therefore limited by the per-bus funding levels, which for electric school buses may include costs for both the bus and electric charging infrastructure. Applicants have the flexibility to budget the EPA funding between the bus itself and the supporting infrastructure.

Date Posted: 7/10/2023

**5.19**: Do you provide high voltage training as required to maintain electric vehicles?

**Answer:** Training for divers and/or mechanics related to the maintenance and operation of new technologies is an eligible cost; however, EPA as an Agency does not provide training for high voltage maintenance operations.

Date Posted: 7/10/2023

**5.20**: Is data collection and related route planning an eligible expense?

**Answer:** Eligible project costs can include intelligent equipment and software designed to monitor bus and infrastructure performance (such as telematics or charge management software), and consultation on bus deployments.

EPA is also partnering with the Joint Office of Energy and Transportation (JOET) to provide technical assistance to CSB program participants, which can include support for route planning; please see our technical assistance page for information on how to contact the JOET: <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance">https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance</a>.

Date Posted: 7/10/2023

**5.21**: If selected, could an applicant choose to allocate all funds toward bus purchases and get additional funds for the supporting infrastructure through another source?

**Answer:** Yes, the applicant may choose to budget all the awarded CSB Grant Program funding for bus purchases. Under this Notice of Funding Opportunity (NOFO), EPA will award evaluation points to applicants that demonstrate that they have leveraged or plan to leverage additional external funds in order to support the proposed project activities, such as public-private partnerships, grants from other entities, or the issuance of school bonds. Additional external leveraged funds do not need to be spent on eligible or allowable costs as listed in Section III.D Project Requirements, meaning that, for example, they may be used for infrastructure costs associated with work on the utility's side of the electrical meter. Please note that replacement school buses and charging infrastructure purchased with EPA CSB Grant funding must not be purchased or otherwise subsidized with other federal grant funds.

**5.22**: How many EPA Regions are there and are there minimum and maximum awards per Region?

**Answer:** There are 10 EPA Regions. Table 2 on page 11 of the Notice of Funding Opportunity (NOFO) details the anticipated regional allocations.

Date Posted: 7/14/2023

**5.23**: Are additional costs (personnel, fringe benefits, travel, etc.) included in the per-bus funding amounts listed in Table 1, or are those costs additional?

**Answer:** Funding beyond the per-bus levels listed in Table 1 is available for project implementation costs (i.e., costs directly related to the implementation, management, and oversight of the project), including personnel, fringe benefits, and travel costs (see Section III.D.4.b of the NOFO).

Date Posted: 7/14/2023

**5.24**: Are workforce development, warranty, training, and other costs included in the bus and charging infrastructure maximum?

**Answer:** Warranty costs are included in the bus and charging infrastructure per-bus maximum. Funding beyond the per-bus levels is available for project implementation costs, meaning costs directly related to the implementation, management, and oversight of the project (see Section III.D.4.b of the Notice of Funding Opportunity (NOFO)). Workforce development and training costs are considered project implementation costs if the training is being purchased separately from the bus and any infrastructure equipment (i.e., not included in the invoice from the bus or charging infrastructure vendor).

Date Posted: 7/14/2023

**5.25**: For non-prioritized school districts, the 2023 Clean School Bus Grant Program will likely only cover the cost difference between a conventional bus and an electric bus. Is there any flexibility in these funding amounts?

Answer: No, the per-bus funding amounts listed in Table 1 in Section II.A of the Notice of Funding Opportunity (NOFO) are final. EPA is partnering with the Joint Office of Energy and Transportation (JOET) and the National Renewable Laboratory to offer clean school bus technical assistance to school districts, including information and tools needed to successfully plan and deploy clean school buses and infrastructure. JOET may be able to help potential applicants identify other sources of federal, state, and local funding relevant to electric school bus projects. As a reminder, the proposed replacement bus and any associated charging infrastructure to be paid for in part by CSB funds must not also be funded by other federal funds. Please visit <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance">https://www.epa.gov/cleanschoolbus/clean-school-bus-technical-assistance</a> for more information. Potential applicants can also contact JOET technical assistance by emailing <a href="mailto:cleanschoolbusTA@nrel.gov">cleanschoolbusTA@nrel.gov</a>.

**5.26**: Is there a limit to the cost of electric vehicle supply equipment (EVSE)?

**Answer:** No. Recipients have flexibility to determine the split between funding for the bus itself and the supporting infrastructure; please refer to Table 1 in the Notice of Funding Opportunity (NOFO) for per bus funding amounts. However, standalone infrastructure projects are not eligible. Reminder that CSB funds must not be used for any infrastructure costs associated with work on the utility's side of the electrical meter, but that leveraged additional resources, such as state and other local funding, may be available for this work.

Date Posted: 7/14/2023

**5.27**: Are third-party consultants an eligible cost in the School District Sub-Program?

**Answer:** Yes, eligible project costs can include driver/mechanic training related to the maintenance and operation of new technologies, consulting on bus deployments, and bus warranties. Eligible project costs also include those costs directly related to the implementation, management, and oversight of the project, including recipient and subrecipient personnel and benefits, equipment, contractual, travel, supplies, subgrants and rebates, and indirect cost. Please see section III.D.4 in the Notice of Funding Opportunity (NOFO) for more eligible and ineligible costs.

Date Posted: 7/14/2023

**5.28**: May applicants use gap-financing in addition to CSB Grant Program funds for the replacement electric school buses, chargers, or charging infrastructure?

**Answer:** Buses, chargers, or infrastructure may all be purchased using financed funds. The fleet serving the school district(s) on the application must take title to the bus before the end of the project period, but the bus can have a lien on it from the organization making the loan. Note, CSB funding cannot be used for leasing vehicles or equipment. If financing is necessary, the purchase should be financed with a conventional purchase loan.

Date Posted: 7/14/2023

**5.29**: Can a district that receives EPA funding also use state/utility incentive funding for EV charging upgrades?

**Answer:** Yes. Although proposed replacement bus and any associated charging infrastructure to be paid for in part by Clean School Bus (CSB) funds must not also be funded by other federal funds, applicants may stack state or local funds with CSB funds. Fleets can use external non-federal funding sources as part of their bus replacement project but must confirm with the source of those funds that they are not pass-through federal funds.

Date Posted: 7/14/2023

**5.30**: Can a cooperative purchasing contract (like Sourcewell) be used instead of the Request for Proposals (RFP) process for procurement of goods?

**Answer:** Yes, if the purchasing contract meets the requirements in 2 CFR Part 200.

**5.31**: Is the local area electrical grid evaluation an eligible cost?

**Answer:** Yes, local area grid evaluation is considered design and engineering and is therefore an eligible infrastructure cost.

Date Posted: 7/14/2023

**5.32**: Do school districts need to apply for their own charging infrastructure if they are a beneficiary on a Third-Party Sub-Program application?

**Answer:** No. Funding amounts listed in Table 1 of the Notice of Funding Opportunity (NOFO) for electric buses may be used for the bus and charging infrastructure. Third-party applicants may include eligible charging infrastructure, see Section III.D. of the Notice of Funding Opportunity (NOFO), as eligible costs on the application. School districts may also replace buses without adding charging infrastructure if the school district does not require funding for charging infrastructure (e.g., has funding for charging infrastructure from other sources and/or already has sufficient charging infrastructure in place).

Date Posted: 7/14/2023

**5.33**: Are the loans from the U.S. Department of Agriculture (USDA) Rural Development Office, Community Facilities Direct Loan and Grant Program stackable with EPA 2023 CSB Grant Program?

**Answer:** The proposed replacement bus and any associated charging infrastructure to be paid for in part by CSB funds must not also be funded by other federal funds (e.g., USDA loans). Federal funds may, however, be used on other, non-CSB funded parts of the project, such as upgrades to infrastructure on the utility side of the meter.

Date Posted: 7/14/2023

#### **5.34**: Are grant funds intended to cover the full cost of buses and chargers?

**Answer:** Funding might not cover the entire cost of the replacement bus and charging infrastructure. Funding amounts per bus are dependent on the bus fuel type, bus class size, number of buses being replaced, and prioritization status as shown in Table 1, section II.A. of the Notice of Funding Opportunity (NOFO). Note, for electric buses, the per bus funding amounts listed in Table 1 in Section II.A of the NOFO represent combined bus-infrastructure funding amounts. Recipients have flexibility to determine the split between funding for the bus itself and the supporting infrastructure. EPA funding for infrastructure is limited to installations between the electrical meter and the charging port. This can include, but is not limited to, charging equipment (such as AC Level 2 charging equipment or direct-current fast charging equipment), design and engineering, and installation costs such as trenching, wiring and electrical upgrades, labor, and permitting. CSB funds must not be used for any infrastructure costs associated with work on the utility's side of the electrical meter. All AC Level 2 charging infrastructure purchased under this program must be EPA ENERGY STAR certified at the time of purchase. See Section III.D for eligible charging infrastructure costs and other charging infrastructure requirements. See Question 5.25 for more information on reaching out to the Joint Office of Energy and Transportation (JOET) for help identifying other sources of federal, state, and local funding relevant to electric school bus projects.

**5.35**: Do the following costs fit under the per-bus funding limits or under project implementation costs: staff time, EVSE installation costs, service and maintenance costs, training and workforce development-related costs, or EVSE software subscriptions?

Answer: The per-bus funding amounts listed in Table 1 in Section II.A of the Notice of Funding Opportunity (NOFO) represent combined bus-infrastructure funding amounts. EVSE installation costs, service and maintenance costs, and EVSE software subscriptions are considered bus and infrastructure costs and are therefore subject to the per-bus funding limits. Project implementation costs, meaning those costs directly related to the implementation, management, and oversight of the project, are eligible costs beyond the cost of the bus and infrastructure and may be requested in the budget table (see Section III.D.4.b of the Notice of Funding Opportunity). Project implementation costs can include recipient personnel and benefits, other equipment, contractual, travel, supplies, subgrants and rebates, and indirect costs. Workforce development and training costs are considered project implementation costs if the training is being purchased separately from the bus and any infrastructure equipment (i.e., not included in the invoice from the bus or charging infrastructure vendor).

Date Posted: 7/20/2023

**5.36**: Can state green banks or financial institutions that provide funding for the items covered within the Clean School Bus (CSB) program be stacked with CSB funds?

**Answer:** Yes. Although the proposed replacement bus and any associated charging infrastructure to be paid for in part by Clean School Bus (CSB) funds must not also be funded by other federal funds, applicants may stack state or local funds with CSB funds. Fleets can use external non-federal funding sources as part of their bus replacement project but must confirm with the source of those funds that they are not pass-through federal funds.

Date Posted: 8/17/2023

**5.37**: Can Clean School Bus grant funds be used to cover the cost of scrapping existing buses? **Answer:** Yes. Scrapping expenses are considered eligible project implementation costs.

Date Posted: 8/17/2023

**5.38**: If selected, may a third-party grantee use CSB funds to cover school-bus related expenses between the time a purchase is made and a utility rebate is disbursed?

**Answer:** Funds can only be used for eligible costs as outlined in the Notice of Funding Opportunity; this includes the purchase of eligible equipment. Grant funds cannot be used to provide gap funding for additional expenses while the applicant waits for funding from a separate utility rebate program. Please see Questions 10.1 and 10.14 for more information about receiving advance funding, noting that the amount of advance payments to a grantee must be limited to the minimum amounts needed and must be as close as is administratively feasible to the actual disbursements by the grantee for project costs. Please also note that CSB funds may not be used for infrastructure costs on the utility side of the meter.

**5.39**: Are air purification devices for existing school buses eligible?

**Answer:** Retrofitting existing school buses is not an eligible activity under the CSB Grant Program. However, a replacement bus may include equipment for cabin air quality, if included in the original invoice.

Date Posted: 8/17/2023

**5.40**: The Notice of Funding Opportunity (NOFO) states that "CSB grants cannot fund research and development, technology demonstration, commercialization, certification, or verification." How does EPA define "commercialization"?

**Answer:** The prohibition of using funds for commercialization means that technologies and equipment purchased with grant funds must already be commercially available on the open market. CSB Funds cannot be used for developing, producing and delivering products, processes, technologies or services for sale or use by the federal government or commercial markets.

Date Posted: 8/17/2023

**5.41**: Are shipping/delivery costs on buses and charging infrastructure eligible expenses?

**Answer:** Shipping/delivery costs for replacement buses are eligible expenses, but shipping/delivery costs for charging infrastructure are not. If the bus shipping/delivery costs are captured on the replacement bus invoice, they are eligible as part of the per-bus funding amounts listed in Table 1 of the NOFO; shipping/delivery costs not captured on the bus invoice may be eligible as project implementation costs.

Date Posted: 8/21/2023

**5.42**: Is additional funding available per bus for a school district that is listed on EPA's Priority Area List but not on the Prioritized School District List?

Answer: The Priority Area List is a list of Ozone and PM2.5 nonattainment and maintenance areas. School Districts on the Priority Area List will receive points toward evaluation criterion 4 Project Location - Nonattainment or Maintenance Area. Separately, the Prioritized School District List is a list of all districts prioritized under the CSB Program as low-income, rural, Bureau of Indian Affairs-funded, or receiving basic support payments under title 20 section 7703(b)(1) for children residing on Indian land. A school district's presence on the Priority Area List does not count towards its prioritization status. Thus, schools that are on the Priority Area List but not on the Prioritized School District List (or eligible to self-certify their prioritization status) are eligible for up to \$250,000 per bus (depending on bus fuel type and class size), plus administrative costs. Please see Table 1 in Section II. A. of the Notice of Funding Opportunity (NOFO) for additional information on per-bus funding levels and prioritization status.

Date Posted: 8/21/2023

**5.43**: Are commissioning fees on charging infrastructure an eligible expense?

**Answer:** Yes. Commissioning fees are eligible infrastructure installation costs.

**5.44**: If applicants do not use Clean School Bus (CSB) funding for charging infrastructure, and instead use their own funds, do the Notice of Funding Opportunity (NOFO) purchase requirements apply?

**Answer:** Grant terms and conditions do not apply to activities and expenditures that are not included in the final approved grant budget and workplan. In other words, only expenditures made in whole or in part with grant funds are subject to the grant requirements. For example, CSB grant funds cannot be used for leasing charging infrastructure, but there is no restriction on using an applicant's own money to lease charging infrastructure. Note, however, that these activities and expenditures may still be subject to federal and state purchase requirements, such as the Build America, Buy America (BABA) Act.

Date Posted: 8/21/2023

**5.45**: If funds designated for the Third-Party Sub-Program are not used, will that money be moved to the School District Sub-Program?

**Answer:** Applications in each sub-program will be evaluated and scored separately; after evaluating all eligible applicants EPA will consider several factors prior to making final funding decisions. For example, in making the final funding decisions, the EPA selection official may also consider geographic diversity of funds, number and size of awards, environmental benefits, applicability of different business models, and other Agency and programmatic priorities. Please refer to Questions 7.1 and 7.2 for additional information on final funding decisions.

Date Posted: 8/21/2023

**5.46**: Is funding available to educate school districts about the health effects of exhaust from school buses on children and drivers?

**Answer:** The 2023 CSB Grant program provides funding to eligible recipients so that they may replace existing school buses with clean and ZE models; please refer to Section III.D.4 of the NOFO for detailed discussion of eligible and ineligible costs under the 2023 CSB Grant Program.

While the funding for outreach to school districts is not an eligible cost under this program, EPA offers a variety of free resources with information for engaging communities on the benefits of clean and ZE school buses (see links below). In addition, EPA evaluated the extent and quality of community engagement in proposed project plans when scoring applications to the program (see Section IV.B(2) Section 3).

- https://www.epa.gov/cleanschoolbus/resources-engage-your-community
- https://www.epa.gov/cleanschoolbus/benefits-clean-school-buses
- https://www.epa.gov/dera/magic-school-bus-childrens-book
- https://www.epa.gov/schools/combating-air-pollution-schools

**5.47**: Is cash funding from a general fund or from capital projects eligible as leveraged external funds?

**Answer:** If the cash funding from a general fund or capital projects would be additional funding that would not otherwise be part of the applicant's existing operating budget, then yes, the cash funding would be eligible as leveraged external funds. See Question 6.32 for more information on leveraged funding from school districts. Please list and describe any additional external funds leveraged in order to support the proposed project activities. Selected applicants must abide by their proposed additional external funding commitments during grant performance. If the proposed additional external funds do not materialize during grant performance, EPA may reconsider the legitimacy of the award and/or take other appropriate action authorized under 2 CFR Part 200.

Date Posted: 8/21/2023

**5.48**: Can leveraged funds be sourced from the Volkswagen State Environmental Mitigation Trust?

**Answer:** Yes, VW State Trust funds may be used as leveraged funds.

Date Posted: 8/21/2023

**5.49**: What are Applicant Costs?

**Answer:** Applicant Costs include costs funded by any eligible contractor, nonprofit student transportation association, Tribe, school district(s), and/or school districts' school bus service provider(s) listed in the application. For example, costs funded by a school district's existing operating budget are applicant costs, even if the direct applicant is a third party. These costs should not be included on the SF-424 or SF-424A.

Date Posted: 8/21/2023

**5.50**: May an applicant that has already used external funds (such as Impact Aid funds) to expand charging infrastructure count these funds as leveraged additional external resource?

**Answer:** No. For the 2023 Clean School Bus Grants, leveraged resources are additional resources that will support or complement the proposed project which are above and beyond the EPA grant funds the applicant is requesting. These are funds that the applicant is securing for the project, in order to contribute to the performance and success of the proposed work, not funds that have already been expended on work already completed. Separately, in the Project Narrative, applicants may include discussion of previously completed work that would support their successful implementation of the proposed project to be completed with CSB Grant Program funding.

Date Posted: 8/21/2023

**5.51**: Can Clean School Bus (CSB) Grant funding be used to cover costs associated with infrastructure that is in process of being installed?

**Answer:** No. Infrastructure purchased with CSB Grant funds must be ordered and installed after receiving official notification of selection for EPA funding.

**5.52**: If selected, may a third-party grantee that provides school bus service to a school district use CSB funds to enter into a procurement contract with another contractor to purchase buses and provide related services?

Answer: Eligible applicants can enter into a contractual arrangement with subcontractors that purchase, own, and/or operate buses to replace and operate buses that serve a public school district as long as the fleet serving the school district takes the bus(es) title(s) before the end of the project period. See Question 3.24 for more information on how Electrification-as-a-Service providers can participate in the 2023 CSB Grants. See also Question 9.a.9 and EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements for more information about procurement and bidding requirements. CSB funds may be used to purchase the replacement buses and on other eligible costs, as described in Section III.D of the Notice of Funding Opportunity (NOFO). However, CSB funds cannot be used to pay for the bus service itself (e.g., the costs of licensing or contracting with the bus service provider, leasing buses, driver salaries, etc.). EPA will not be involved in this contractual arrangement.

Date Posted: 8/21/2023

**5.53**: Are applicants allowed to replace an existing bus with a bus of a different weight class from the existing bus? If yes, is per-bus funding based on the weight class of the existing bus or the replacement bus?

**Answer:** Yes, applicants may replace an existing bus with a bus of a different weight class from the existing bus. The maximum grant funding amount per bus is dependent on the replacement bus size and fuel type, as well as whether the school district(s) that will be served by the bus meets one or more prioritization criteria. The per-bus funding amounts can be found in Table 1 of the Notice of Funding Opportunity (NOFO). Scrapping an existing bus for a different weight class replacement bus will not impact the funding level of what is provided for the replacement bus. Please note, the existing bus and replacement bus must have a Gross Vehicle Weight Rating (GVWR) of 10,001 lbs or more.

Date Posted: 8/21/2023

**5.54**: Can a state agency provide American Rescue Plan Act (ARPA) funds for school districts to use as leveraged funds on the same bus funded with Clean School Bus funds?

**Answer:** No. Unless specific sources of federal funds have specific Congressional authorization to be used as such, federal funds cannot be used as leveraged funds on buses or equipment purchased with Clean School Bus funding. ARPA funds provided by a state agency are considered pass-through federal funds and cannot be used as leveraged funding.

Date Posted: 12/21/2023

**5.55**: Are transformers eligible costs under the CSB program?

**Answer:** No, 2023 Clean School Bus Grant funds cannot be used for transformers and their installation, as noted in section III.D.4.h.ii of the Notice of Funding Opportunity. EPA recommends reaching out to your utility for more information on the support they can offer on this work. State and other local funding may also be available for this work.

5.56: Can EPA please define "pass-through federal funding"?

**Answer:** Pass-through federal funding is any funding that a project or applicant would receive that originated from a federal grant or funding program. A state receiving federal allocations cannot pass this funding on to a school district to use as leveraged additional external funds under the Clean School Bus Grant program unless those funds have specific Congressional authorization to be used as such because the funding originated from a federal source.

Date Posted: 12/21/2023

**5.57**: Can we update our budget if costs are lower than expected? If so, will we "lose" money?

**Answer:** Funds can be reallocated on a case-by-case basis. Please discuss the possibility of reallocation with your Project Officer to ensure that your new work plan stays within the scope of your original work plan.

Date Posted: 7/24/2024

**5.58**: What happens if our charging and infrastructure equipment costs go over budget?

**Answer:** The EPA cannot award additional funding, even if costs exceed the original budget amount; however, other sources of state, local, or private funding may be available to support ZEV infrastructure. See the Clean School Bus Technical Assistance webpage for more information on other potentially relevant funding opportunities.

Note, new replacement vehicles and EVSE purchased with CSB funds must not be purchased or otherwise subsidized with other federal funds.

Date Posted: 7/24/2024

\*New\* 5.59: May tax exempt lease-purchase (TELPs) agreements be used to pay for vehicles or infrastructure costs?

**Answer:** No. Leases, including a TELP agreement or municipal lease, cannot be used under this Notice of Funding Opportunity. If financing is necessary, the purchase should be financed with a conventional purchase loan such that the new vehicle(s) is owned by the grantee at the end of the project period.

Date Posted: 12/6/2024

\*New\* **5.60**: Do publicly accessible EV chargers paid with Federal grants or rebates need to be ADA compliant?

**Answer:** Publicly accessible EV chargers paid for by Federal grants or rebates that are owned and operated by state or local governments are subject to ADA.

Date Posted: 12/6/2024

\*New\* **5.61**: Could a Greenhouse Gas Revolving Fund (GGRF) recipient or subrecipient provide a bridge loan to a CSB program participant that could be repaid with a Federal tax credit?

**Answer:** Yes. Loans, unlike grants, are expected to be repaid and the CSB recipient is thus ultimately using their own funds once the tax credit is earned, and thus the restriction on stacking Federal funds does not apply to federally funded loans, federally guaranteed loans, or other instruments that require repayment with non-federal funds.

Date Posted: 12/6/2024

## 6. Application Package and Process

6.1: When are applications due?

**Answer:** The deadline for submitting applications electronically to EPA through Grants.gov (<a href="www.grants.gov">www.grants.gov</a>) is August 22, 2023, at 11:59 p.m. Eastern Time (ET). Late applications will not be considered for funding. EPA recommends not waiting until close to the deadline to submit to reduce the risk of technical or other issues causing a user to miss the application period.

Date Posted: 6/5/2023

**6.2**: In a nutshell, how does the application process work?

**Answer:** The Notice of Funding Opportunity (NOFO) describes all the project eligibility and application submission information. The NOFO, as well as a sample project narrative and all related materials, may be found at <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-program-grants">https://www.epa.gov/cleanschoolbus/clean-school-bus-program-grants</a> (including standard forms (SF) 424, SF 424A, EPA Form 4700-4, and the EPA form 5700-54 from Grants.gov under Funding Opportunity Number EPA-OAR-OTAQ-23-06). The project narrative and any supporting documents should be attached to the application package, and the full package submitted to EPA through Grants.gov. You will find instructions to submit your application through Grants.gov in Section IV of the NOFO.

Please refer to the application submission checklist in Appendix B to ensure that all required information is included in your package. Application packages must be submitted electronically to EPA through Grants.gov (<a href="www.grants.gov">www.grants.gov</a>) no later than Tuesday, August 22, 2023, at 11:59 p.m. Eastern Time (ET) in order to be considered for funding.

If your organization is not currently registered with Grants.gov, please begin the registration process as soon as possible since the process can take several weeks or more. Please note that the registration process also requires that your organization have a Unique Entity Identifier (UEI) and a current registration with the System for Award Management (SAM.gov). Please visit <a href="https://www.sam.gov">www.sam.gov</a> to check the status of your organization's SAM registration. SAM.gov registration and UEI number: If you have never done business with the Federal Government, you will need to first obtain a login.gov account. This will enable you to register with SAM.gov to obtain a Unique Entity Identification number (UEI), a 12-character alphanumeric ID. The UEI is required to register in Grants.gov and complete the grant application. Applicants must ensure that all registration requirements are met to apply for this opportunity through Grants.gov and should ensure that all such requirements have been met well in advance of the application submission deadline.

• If you have previously done business with the Federal Government, you may verify your entity status using your government issued UEI, to determine if your registration is active. SAM.gov requires you to renew your registration every 365 days. Applicants should also ensure that their SAM.gov registration includes a current e-Business (EBiz)

- point of contact name and email address, as this information is critical for Grants.gov Registration and system functionality.
- Contact the Federal Service Desk for help with your SAM.gov account, to resolve technical issues or chat with a help desk agent: (866) 606-8220. The Federal Service desk hours of operation are Monday Friday, 8am 8pm ET.
- The process to get a new or update a SAM.gov account can take significant time so any potential applicants should start this process as soon as possible.

Date Posted: 6/5/2023

**6.3**: What is the Assistance Listing Number for the Clean School Bus Grants program?

**Answer:** The Assistance Listing Number (previously called the Catalog of Federal Domestic Assistance, or CFDA, number) for the 2023 Clean School Bus Grants is 66.045.

Date Posted: 6/5/2023

6.4: Where can I find my SAM.gov Unique Entity ID (UEI)?

Answer: For guidance on how to find your SAM.gov UEI, please see

https://sam.gov/content/duns-uei.

Date Posted: 6/5/2023

**6.5**: What should I do if the "Apply" button is grayed out in Grants.gov?

Answer: If the submit button is grayed out, it may be because you do not have the appropriate role to submit in your organization. Only person(s) with the Authorized Organization Representative (AOR) role can submit applications in Grants.gov. You may wish to review the Intro to Grants.gov-Understanding User Roles and Learning Workspace – User Roles and Workspace Actions for details on this important process. If you do have the appropriate role to submit in your organization and the button is still grayed out, please contact the Grants.gov Support Center for assistance at <a href="mailto:support@grants.gov">support@grants.gov</a> or 1-800-518-4726.

Date Posted: 6/5/2023

**6.6**: I am encountering issues registering for SAM.gov. What should I do if the Federal Service Desk (FSD) is not resolving the issue?

**Answer:** The Federal Service Desk (FSD) is the official government support resource for SAM.gov. While awaiting a response from them, you may want to review the help resources on sam.gov found here: https://sam.gov/content/help.

Date Posted: 6/5/2023

**6.7**: Where can I find my school district's National Center for Education Statistics (NCES) District ID?

**Answer:** You can search for the 7-character NCES District ID at

https://nces.ed.gov/ccd/districtsearch/.

**6.8**: Can an eligible school bus that will be replaced appear on more than one application?

**Answer:** No. Existing school buses that will be replaced may only appear on one application.

Date Posted: 6/5/2023

**6.9**: Can a school district appear on more than one application?

**Answer:** Multiple applications may be submitted to replace buses serving the same school district, but each bus may only appear on one application. For example, if a school district that owns school buses also contracts with a private bus fleet for student transportation services, the school district and the private bus fleet may submit separate applications as long as each application contains unique buses for replacement.

Date Posted: 6/5/2023

**6.10**: Are third parties able to submit multiple applications for different school districts?

**Answer:** All applicants are limited to one application per EPA Region. There are 10 EPA Regions, so applicants may submit up to 10 applications (one per Region). At least four school districts must appear on the same third-party application. As a reminder, the same existing school bus to be replaced cannot appear on multiple applications; each application must contain unique existing school buses to be replaced.

Date Posted: 6/5/2023

**6.11**: Will submitted applications be publicly available? Will submitted applications be subject to Freedom of Information Act (FOIA) requests?

**Answer:** Applications will not be publicly available. The Agency protects competitive proposals/applications from disclosure under applicable FOIA provisions prior to the completion of the competitive selection process. Note, however, that applications submitted under this Notice of Funding Opportunity (NOFO) may be released in part or in whole in response to a FOIA request after completion of the competitive selection process. Therefore, EPA recommends that applications not include trade secrets or commercial or financial information that is confidential or privileged, or sensitive information, if disclosed, that would invade another individual's personal privacy (e.g., an individual's salary, personal email addresses, etc.). If such information is included, it will be treated in accordance with 40 CFR § 2.203.

Date Posted: 6/5/2023

**6.12**: Are letters of support from offices of U.S. Senators or House members accepted for the Clean School Bus Grant Program?

**Answer:** EPA will consider letters of support from project partners, including Congressional offices, which demonstrate strong, long-term involvement throughout the project. Letters should specifically indicate how project partners and supporting organizations will participate in or directly assist in the design and performance of the project, or how obtaining support from project partners will allow the applicant to more effectively perform the project. Letters should be addressed to the applicant organization and included as attachments to the application (use the "Other Attachments" form in Grants.gov). Letters submitted by partners directly to EPA will not be accepted.

**6.13**: What types of consulting activities does EPA expect in support of bus deployments, referenced in the Training, Consulting, and Warranty Costs section on page 21 in the 2023 Clean School Bus (CSB) Grant Program Notice of Funding Opportunity (NOFO) document? How will costs related to such consulting be factored into the evaluation of applications?

**Answer:** Contractual services (including consultant services) are those services to be carried out by an individual or organization, other than the applicant, in the form of a procurement relationship. Consulting activities for new bus deployments might include, but are not limited to, planning for infrastructure, completing site surveys, determining charging needs, and selecting electric school buses.

Applicants are not directly evaluated on whether or not their application contains contractual costs. Applicants are evaluated based on the criteria defined in Section V.A of the NOFO. Specifically, under the "Budget" criterion, EPA will evaluate applicants based on the extent and quality to which:

- A. (5 points) The proposed budget provides a detailed breakout by funding type in the proper budget category for each activity the applicant is requesting funding
- B. (5 points) The applicant's approach, procedures, and controls will ensure that awarded grant funds will be expended in a timely and efficient manner.
- C. (5 points) The proposed costs are reasonable to accomplish the proposed goals, objectives, and measurable environmental outcomes.

Date Posted: 6/5/2023

### **6.14**: Can you please further define "beneficiary"?

**Answer:** For Third-Party Sub-Program applicants, each school district the third-party is working with is a school district beneficiary. Third-Party Sub-Program applicants are required to support at least four different school district beneficiaries, although there is no minimum number of buses per beneficiary (as long as the total number of buses for the third-party grant is between 25 and 100).

The term "beneficiary" is also used in the Notice of Funding Opportunity (NOFO) regarding Participant Support Costs (PSCs). Recipients may provide PSCs to program beneficiaries to enable beneficiaries to participate in the recipient's program or project. PSCs include rebates, subsidies, stipends, or other payments to program beneficiaries by a grantee, subrecipient, or contractor.

In the PSC context, program beneficiaries participate in the grant recipient's project or program instead of implementing their own project or program. Program beneficiaries may include, but are not limited to individual owner/operators and private or public fleet owners.

Date Posted: 6/5/2023

### **6.15**: Is EPA providing a third-party approval certification template for school districts?

**Answer:** Yes. Third-party applicants must submit documentation that the school districts being served are aware and approve of the third party's application. Third-party applicants may choose to provide documentation in the form of the template provided on the CSB Grants Website. See <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-program-grants">https://www.epa.gov/cleanschoolbus/clean-school-bus-program-grants</a>.

**6.16**: The Notice of Funding Opportunity (NOFO) says that service/maintenance contracts are not considered part of the Equipment category and should be listed as Other. But the sample budget table provided by EPA in the Sample Project Narrative document lists service/maintenance contracts in the Equipment category. Please clarify.

**Answer:** The budget table is incorrect. Service/maintenance contracts that are included in the purchase price of the vehicle/equipment should not be listed as a separate line item in the Equipment category. Any service/maintenance contracts not included in the purchase price for the equipment should be included in the "Other" category as a separate line item.

Date Posted: 6/22/2023

**6.17**: Please clarify what EPA means by "Applicants may submit a total of one application per EPA Region under this solicitation." Does this mean that only one application overall can be submitted and selected per Region?

**Answer:** The "one application per EPA Region" limitation applies to individual applicants. Multiple applications may be submitted and selected per Region, depending on the number of meritorious applications received by each region, Agency appropriations, funding availability, Agency priorities, and other applicable considerations.

Date Posted: 6/22/2023

**6.18**: How long will the application take to complete?

**Answer:** Grants generally require longer, more detailed applications than rebates. EPA encourages school districts to consider which competition structure best suits their needs. If the grant application is not a good fit for your school, you could wait and apply to the 2023 CSB Rebate Program once it opens later this year.

Date Posted: 6/22/2023

**6.19**: Is the checklist in Appendix B a detailed guide for each item in the application package?

**Answer:** No. The checklist in Appendix B is intended to be a simple list of the mandatory and optional materials to include in your application package. The Notice of Funding Opportunity (NOFO) will provide details on how to complete each item. Additionally, several mandatory forms and optional templates are available on the <u>2023 CSB Grants website</u> and may provide additional instructions or suggestions.

Date Posted: 6/22/2023

**6.20**: Where is the application? Is it an online form or just a Word document?

**Answer:** The application period for the 2023 Notice of Funding Opportunity (NOFO) closed on August 22, 2023; application materials were available through the <u>2023 CSB Grants</u> along with information on submitting the application online via <u>Grants.gov</u>. For more information on the application process please see <u>Section IV.A</u> of the NOFO.

6.21: Does EPA provide guidance or consulting services to help applicants write grants?

**Answer:** No. However, you may submit specific questions about the program to <u>cleanschoolbus@epa.gov</u>. EPA's Office of Grants and Debarment also offers training and resources to help applicants apply for grant funding at: <a href="https://www.epa.gov/grants">https://www.epa.gov/grants</a>.

Separately, EPA has also selected 17 Environmental Justice Thriving Communities Technical Assistance Centers (EJ TCTACs) in partnership with the U.S. Department of Energy; these centers will provide training and other assistance to build capacity for navigating federal grant application systems, writing strong grant proposals, and effectively managing grant funding. For more information on EJ TCTACs, please refer to

https://www.epa.gov/environmentaljustice/environmental-justice-thriving-communities-technical-assistance-centers.

Date Posted: 6/22/2023

**6.22**: Can Third-Party Sub-Program applicants include additional documentation regarding warranty, training, etc. that will be offered to school districts in the application package separate from the narrative?

**Answer:** Training and warranty coverage should be detailed within the project narrative, for example Section 7 – Workforce Development and Section 10 – Budget. Applicants may submit optional documents, as described in Section IV.A.3 of the Notice of Funding Opportunity (NOFO), which are not included in the project narrative page limit.

Date Posted: 6/22/2023

**6.23**: Are vehicle, charger, and estimated infrastructure construction quotes required to be submitted as part of the application?

**Answer:** Quotes are not required to be submitted with the application. However, applicants should provide a detailed breakdown of these costs in the proper budget category for each activity requesting funds. Applicants may want to get an estimated quote for buses and, if applicable, charging infrastructure and associated installation, to better estimate these budget breakdowns.

Date Posted: 6/22/2023

**6.24**: If we are applying under the Third-Party Sub-Program, is the Application Narrative Attachment form limited to 15 pages total or 15 pages per school district beneficiary?

**Answer:** The Application Narrative Attachment form should not exceed 15 pages total, regardless of the number of school district beneficiaries included in an application.

**6.25**: Are there any limits on letters of support and will they be accepted?

**Answer:** There are no limits to the number of partnership letters, however such letters should specifically indicate how these project partners and supporting organizations will participate in or directly assist in the design and performance of the project, or how obtaining support from project partners will allow the applicant to more effectively perform the project. Applicants should, in their narrative, be clear how the letters are related to specific evaluation criteria. Letters should be addressed to the applicant organization and included as attachments to the application. Please do not ask partners to submit letters directly to EPA.

Date Posted: 7/10/2023

**6.26**: Can a school district application reflect relationships with multiple contractors as long as the total number of buses for which funding is being sought does not exceed 50?

Answer: Yes.

Date Posted: 7/10/2023

**6.27**: Under SF424A-V1.0, Budget Information, #6 - Object Class, which category would the cost of EVSE installation (trenching, re-paving, conduit, etc., engineering review and drawings permitting) be listed under? (d) Equipment, (f) Contractual, (g) Construction, or (h) Other?

**Answer:** The applicant should line item their direct expenditures. Materials and supplies being purchased directly by the applicant which exceed \$5000 per unit should be listed under Equipment. Any other materials purchased directly by the applicant should go under Supplies. The Contracts line item should include any contractual services (including consultant or installation services) carried out by an individual or organization, other than the applicant, in the form of a procurement relationship. If all of the materials and supplies will be purchased by the contractor as part of the installation contract, then all costs should be itemized under Contractual.

Date Posted: 7/10/2023

**6.28**: Under SF424A-V1.0, Budget Information, #6 - Object Class, which category would the cost of EVSE software subscriptions (annual) be listed under? (d) Equipment, (f) Contractual, (g) Construction, or (h) Other?

**Answer:** The applicant should line item their direct expenditures. The "Other" category should include only those types of direct costs that do not fit in any of the other budget categories. Examples of costs that may be in this category are: insurance; equipment service or maintenance contracts; printing or photocopying; participant support costs such as non-employee training stipends and travel, subsidies or rebates for purchases of pollution control equipment (such as a specified amount of funding for residential woodstove changeouts or truck owners to purchase cleaner trucks); and subaward costs.

**6.29**: Under SF424A-V1.0, Budget Information, #6 - Object Class, which category would the cost of Fleet management software/telematics be listed under? (d) Equipment, (f) Contractual, (g) Construction, or (h) Other?

**Answer:** The applicant should line item their direct expenditures. The "Supplies" category should include all tangible personal property other than "equipment" Materials and supplies being purchased directly by the applicant which exceed \$5000 per unit should be listed under Equipment. Any other materials purchased directly by the applicant should go under Supplies. The budget detail should identify categories of supplies to be procured (e.g., laboratory supplies or office supplies).

Date Posted: 7/10/2023

**6.30**: On SF424A-V1.0, Budget Information, #6 - Object Class Categories, which category would the cost of electrical service equipment upgrades (distribution line, transformers, etc.), electrical panel maintenance, and a maintenance support package (if not included in warranty) be listed under?

**Answer:** The applicant should line item their direct expenditures. Personnel costs are limited to paid employees of the applicant organization. Items to be purchased directly by the applicant organization which exceed \$5000 per unit, should be listed under Equipment. Any other materials purchased directly by the applicant should go under Supplies. The Contracts line item should include any contractual services (including consultant services) carried out by an individual or organization, other than the applicant, in the form of a procurement relationship. If materials and supplies will be purchased by a contractor as part of an installation contract, then all costs should be itemized under Contractual.

Date Posted: 7/14/2023

**6.31**: If a school district has determined their best option is applying through a Third-Party Sub-Program (given the small number of buses they have), can EPA provide resources to help connect schools with an entity to potentially partner with?

**Answer:** For competition fairness reasons, EPA is unable to connect school districts with potential partners.

Date Posted: 7/14/2023

**6.32**: What types of school district funding contributions are considered leveraged?

**Answer:** Leveraged costs include funding sources external to the district's existing budget, including voter-approved school bonds.

**6.33**: Does EPA's Environmental Justice Thriving Communities Technical Assistance Centers (EJ TCTACs) provide technical assistance to overburdened districts who wish to submit a 2023 Grants application?

**Answer:** EPA has selected 17 Environmental Justice Thriving Communities Technical Assistance Centers (EJ TCTACs) in partnership with the U.S. Department of Energy; these centers will provide training and other assistance to build capacity for navigating federal grant application systems, writing strong grant proposals, and effectively managing grant funding. For more information on EJ TCTACs, please refer to

https://www.epa.gov/environmentaljustice/environmental-justice-thriving-communities-technical-assistance-centers

In addition, EPA is partnering with the Joint Office of Energy and Transportation and the National Renewable Laboratory to offer clean school bus technical assistance. For technical assistance on planning and deploying clean school buses and infrastructure, please contact cleanschoolbusTA@nrel.gov.

Date Posted: 7/14/2023

**6.34**: For the cost estimate on the Utility Partnership Templates, are you looking for the contributions in aid of construction or total cost?

**Answer:** The goal of the Utility Partnership Template is to facilitate discussion and common understanding between the school district and their utility. The discussion around the cost estimate is intended to help the applicant understand the total cost of an electric school bus project, although EPA also recommends gaining understanding of any potential contributions in aid.

Date Posted: 7/14/2023

**6.35**: Can the eBusiness (EBiz) point of contact be from a secondary/partner organization to review and submit application?

**Answer:** Grants.gov Workspace offers multiple approaches to collaborating on an application. Please see <a href="https://www.grants.gov/applicants/workspace-overview.html">https://www.grants.gov/applicants/workspace-overview.html</a> for more information about the Workspace. Only person(s) with the Authorized Organization Representative (AOR) role within your organization can submit an application.

Date Posted: 7/14/2023

**6.36**: Is participation in state programs funded, in whole or in part, with DERA grants, considered experience in "federally-funded assistance agreements", as discussed on page 34 of the NOFO?

**Answer:** No, the "federally-funded assistance agreements" discussed on page 34 of the Notice of Funding Opportunity (NOFO) must be awards directly to the applicant. In this case, the organization wouldn't be the direct recipient of the assistance agreement since the State received the DERA State Grant. Applicants that do not have any relevant or available past performance or reporting information and that indicate this in the application will receive a neutral score for sub-criteria A. and B. (a neutral score is half of the total points available in a subset of possible points).

**6.37**: Can you please explain login.gov and how it connects to SAM.gov and Grants.gov?

**Answer:** Login.gov is a secure sign-in service used by the public to sign into Federal Agency systems including SAM.gov and Grants.gov. You will need to create a login.gov to then subsequently create your SAM.gov and Grants.gov accounts. For help with login.gov accounts you can visit <a href="http://login.gov/help">http://login.gov/help</a>.

Date Posted: 7/14/2023

**6.38**: If an applicant self-certifies its low-income prioritization status, what documentation is needed and how is it submitted?

**Answer:** Applicants looking to self-certify may do so by indicating the necessary information in the application narrative. This is detailed in the Prioritization Self-Certification Instructions at <a href="https://www.epa.gov/system/files/documents/2023-04/fy23-csb-prioritization-self-cert-instructions-2023-04.pdf">https://www.epa.gov/system/files/documents/2023-04/fy23-csb-prioritization-self-cert-instructions-2023-04.pdf</a>. Applicants may also optionally submit an official document certifying which schools within the school district received Title I funding or the number of schools within your district and how many received Title I funding, depending on how they are self-certifying, as outlined in the instructions. Applicants are not required to submit this optional documentation and applicants that do submit this documentation will not receive additional points for it.

Applicants that choose to submit documentation should do so as part of the 2023 Clean School Bus grant application package to www.Grants.gov.

Date Posted: 7/14/2023

**6.39**: How will EPA determine if and in what way to assign different points to criteria or add new criteria for the application evaluation?

**Answer:** Every application will be evaluated based on a total of 120 points possible. A breakdown of criteria and points can be found under Evaluation Criteria in Section V.A. of the Notice of Funding Opportunity (NOFO). The criteria will remain as they are listed in the NOFO for the 2023 Grants round of funding. EPA takes feedback from previous funding opportunities into consideration for changes to future application processes.

Date Posted: 7/14/2023

**6.40**: If a school district doesn't have grant writing staff, who would be best qualified to write this grant application?

**Answer:** Any staff member can contribute to your grant application. Grants.gov Workspace is collaborative, so all who would like to contribute can do so by creating their own individual Grants.gov account. Please see Questions 6.2 and 6.5 for more information on Grants.gov registration. Please see Questions 2.21 and 6.21 for grant-writing tools, trainings, and resources.

Date Posted: 7/14/2023

6.41: Does the Clean School Bus Grant Program require a letter of intent to apply?

Answer: No.

Date Posted: 7/14/2023

**6.42**: May a Third-Party Sub-Program applicant submit 10 applications per EPA Region for 10 buses or 10 individual applications per Region for up to 100 buses each?

**Answer:** Third-Party Sub-Program applicants may submit 1 application per EPA Region; since there are 10 EPA Regions, applicants may submit up to 10 applications (one per Region). Each application will be judged separately and must separately meet the eligibility requirements, including bus minimums and maximums (e.g., each Third-party application must list 25 to 100 buses for replacement).

Date Posted: 7/14/2023

**6.43**: If a large school district divides their transportation services into multiple contracts, would each contract count as a separate entry for the four school district beneficiary minimum under the Third-Party Sub-Program?

**Answer:** No, each school district is a single beneficiary, regardless of the number of contracts in place.

Date Posted: 7/14/2023

**6.44**: Will applications be scored as they come in, or will all applications be reviewed once the Notice of Funding Opportunity (NOFO) closes on August 22?

**Answer:** All applications will be reviewed after the NOFO application closes on August 22, 2023.

Date Posted: 7/14/2023

**6.45**: Does the table in Section 1.b of the Project Narrative Cover Page refer to the applicant's current or replacement bus fleet?

**Answer:** The table in Section 1.b should be filled in with information on the new replacement buses that the applicant proposes to purchase with Clean School Bus funds.

Date Posted: 7/20/2023

**6.46**: Can you define "leveraged resources" and elaborate on how these resources will be evaluated and weighed in awarding funding?

**Answer:** Leveraged resources are additional resources to support or complement the proposed project which are above and beyond the EPA grant funds the applicant is requesting. Examples of sources for leveraged resources include, but are not limited to, public-private partnerships, grants from other entities, and the issuance of school bonds.

Applicants will receive up to 15 points for leveraged funds under the Leveraging of Additional External Funds evaluation criterion (as noted in Section V.A of the NOFO, a total of up to 120 points may be awarded across all evaluation criteria). Applicants will be evaluated based on the amount and type of additional external funds, how they will obtain the additional external funds, the likelihood the additional external funds will materialize during grant performance, the strength of the additional external funding commitment, and the role that the additional external funds will play in supporting the proposed project activities. Note, new replacement buses and, if applicable, charging infrastructure for electric school buses purchased with CSB Grant funds, must not be purchased or otherwise subsidized with other federal grant funds. Please see Questions 5.14 and 5.17 for more information on stacking federal, state, and local funding on 2023 CSB grants.

Date Posted: 7/20/2023

**6.47**: Should applicants list staff who would work on the grant, but would not be paid with grant funds, in Section 5 (Staff Expertise) and Section 9 (Leveraging of Additional External Funds) of the application?

**Answer:** Yes, applicants should include key staff in Section 5 and the external funds that will be used in Section 9. Note, applicants should not include additional external funds in the project budget on the SF-424 or SF-424A. They should, however, include these costs and contributions in the budget detail described in Section 10 of the project narrative template.

Date Posted: 7/20/2023

**6.48**: May applicants list federally-funded assistance agreements that were closed out in the past three years in the Past Performance section of the application, even if the assistance agreements were issued more than three years ago?

**Answer:** Yes. Applicants may list up to five federally-funded assistance agreements they are performing or have performed within the past three years, regardless of when the award was issued.

Date Posted: 7/20/2023

**6.49**: Where can I find instructions to fill out the SF-424 Form?

**Answer:** Instructions for the SF-424 form can be found at <a href="https://www.grants.gov/forms/forms-repository/sf-424-family">https://www.grants.gov/forms/forms-repository/sf-424-family</a> under the "Form Instructions" column. The instructions will state whether fields are required or optional and will include guidance for filling out each section. Please note that leveraged funds should not be included in the total project cost of the assistance agreement on the SF 424 and SF 424-A forms but should be included in the project narrative budget table.

**6.50**: On the "Fleet Description" tab of the Application Fleet Sheet, should applicants list the number of school buses and electric infrastructure equipment currently in the fleet or the number they are applying for with the grant?

**Answer:** Applicants should list the number of school buses and electric infrastructure equipment they are applying for with the grant.

Date Posted: 8/17/2023

**6.51**: Who signs the Third-Party Approval Certification form if an Original Equipment Manufacturer (OEM) or dealer is applying on behalf of a school district?

**Answer:** An authorized representative of school district is responsible for signing the Third-Party Approval Certification. This is to ensure that the school district being served is aware of and approves of the third party's application on their behalf.

Date Posted: 8/17/2023

**6.52**: Are applicants expected to follow the format of the project narrative template? Must they include a version of the evaluation criteria scoring chart within their project narrative?

**Answer:** Applicants are not required, but are highly encouraged, to use the project narrative sample format, including the cover page. See the sample project narrative sample format at <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-program-grants">https://www.epa.gov/cleanschoolbus/clean-school-bus-program-grants</a>. Applicants should explicitly address the evaluation criteria in the project narrative, but should not include a scoring chart.

Date Posted: 8/17/2023

**6.53**: Should applicants only list the buses they are targeting for replacement in the "Current Vehicle Information" fields of the Application Fleet Sheet or should they list their entire fleet?

**Answer:** Applicants should list only the buses targeted for replacement.

Date Posted: 8/17/2023

**6.54**: Should existing electric vehicle supply equipment (EVSE) be listed in the "EV Infrastructure" tab of the Application Fleet Sheet or only new ESVE? If the new ESVE will be owned and funded by a third party, should it still be entered?

**Answer:** Applicants should fill out the EV infrastructure tab with the anticipated new CSB-funded ESVE needed to operate their electric bus fleet. Please complete the EV infrastructure tab regardless of who owns the equipment.

**6.55**: How should applicants calculate the percentage of time buses provide service in non-attainment or maintenance areas?

**Answer:** If an application includes buses operating in more than one area, please indicate where the vehicles operate and the annual percentage (%) of time the vehicles typically operate in each area, based on operating hours. If the bus will operate equally across these multiple locations, please split the percentage in an equal manner across these locations. If you do not know the exact operating hours per area, please use your best reasonable estimate and include your methodology and indicate that it is an estimate.

Date Posted: 8/17/2023

6.56: Can a school district submit an application in each of the 10 EPA Regions?

**Answer:** Applicants in the School District Sub-Program must request funding from the EPA Region that covers their geographic project location. The term "project location" as used in this Notice of Funding Opportunity (NOFO) refers to the area(s) where the affected vehicles operate. See Section IV.B in the NOFO for additional information on project location and the geographic boundaries for each EPA Region.

Date Posted: 8/17/2023

**6.57**: In scoring applications, how will the age of the existing fleet be considered? Will it lessen chance of award if buses that would be replaced are relatively new?

**Answer:** Applications will be evaluated using the evaluation criteria in Section V.A of the Notice of Funding Opportunity (NOFO); the age of existing buses is not an evaluation criterion and thus applicants replacing newer buses do not have a lower chance of award. However, all existing buses to be replaced must meet the eligibility requirements listed in Section III.D of the Notice of Funding Opportunity (NOFO), including the model year requirements; these model year requirements are designed to ensure significant emission reductions from CSB projects.

Date Posted: 8/17/2023

**6.58**: Will EPA only fund the prioritized school district beneficiaries in a third-party application that contains both prioritized and non-prioritized school districts?

**Answer:** Applications will be evaluated in their entirety. Applicants will receive prioritization points based on the number of buses proposed to serve prioritized school districts. Note that EPA reserves the right to partially fund applications by funding separate portions or phases of proposed projects. If EPA decides to partially fund an application, it will do so in a manner that does not prejudice any applicants or affect the basis upon which the application, or portion thereof, was evaluated and selected for award, thereby maintaining the integrity of the competition and selection process.

Date Posted: 8/17/2023

**6.59**: Are applicants able to submit attachments other than the optional attachments listed?

**Answer:** No. Supporting materials are limited to the applicant fleet sheet, documentation of third-party approval, documentation of partnership with utility, self-certification of prioritization, leveraged resources commitment letters, biographies, indirect cost rate agreements, and partnership letters. Applicants should, in their narrative, be clear how attachments are related to specific evaluation criteria.

**6.60**: In the Application Fleet Sheet, is "% of time operated in each ZIP code" referring to the percentage of time or miles? If time, how does EPA define "operated?" Should time that the bus spends off (not idling), be included in the "operated" time frame?

**Answer:** The "% of time operated in each ZIP code" field refers to the percentage of time, not miles. Operating hours includes hours spent idling, but not hours that the bus is turned off. So, for example, an applicant would include the percentage of time spent idling at school(s), waiting to pick up students, driving to locations to pick-up/drop-off students, but would not include time where the bus is parked overnight or between routes. See Question 6.61 for more information.

Date Posted: 8/21/2023

**6.61**: In the Application Fleet Sheet, should applicants list every ZIP code served by the bus if there are many with a small (single digit) percentage of time operated in each ZIP code?

**Answer:** Applicants should list each ZIP code the bus operates significant time in (e.g., bus stops and significant portions of their routes). Applicants do not need to list ZIP codes that school buses spend negligible time in (e.g., ZIP codes that buses pass through briefly on their routes).

Date Posted: 8/21/2023

**6.62**: On the SF-424, what is 5a, the Federal Entity Identifier?

**Answer:** The Federal Entity Identifier is the number assigned to your organization by the Federal Agency, if any.

Date Posted: 8/21/2023

**6.63**: On the SF-424, what is 4, the applicant identifier?

**Answer:** The applicant identifier is the entity identifier assigned by the Federal agency, if any, or applicant's control number, if applicable.

Date Posted: 8/21/2023

**6.64**: In Section 10 of SF-424A, what information should applicants provide about external funds? Do applicants need to report district and partner contributions or other federal funds leveraged?

**Answer:** Funds contributed by the applicant and leveraged additional external funds should not be included in the total project cost of the assistance agreement on the SF-424 and SF-424A forms but should be included in the budget narrative and budget table in Section 10 of the project narrative. Leveraged funds are external funds that would not otherwise be part of the applicant's existing operating budget. In Section 10 of the project narrative, applicants should account for both federal funds and any leveraged additional external funds they have secured or plan to secure in order to support the proposed project activities.

**6.65**: SF-424 asks "is the application subject to Review by State Under Executive Order 12372 Process?" Where can I find more information about whether my CSB application is subject to review by my State?

**Answer:** A list of EPA Financial Assistance Programs that are subject to Executive Order 12372 (Intergovernmental Review), as implemented in 40 CFR Part 29, and Section 204 of the Demonstration Cities and Metropolitan Development Act and Section 401 of the Intergovernmental Cooperation Act, can be found at <a href="https://www.epa.gov/sites/default/files/2020-">https://www.epa.gov/sites/default/files/2020-</a>

<u>12/documents/epa programs subject ir 2020 08 03.pdf</u>. This document also identifies which States require State Single Point of Contact (SPOC) review of these programs and SPOC contact information. Please note that CSB grants are only subject to intergovernmental review when the proposed Federal financial assistance involves the installation of electric vehicle charging infrastructure.

Date Posted: 8/21/2023

**6.66**: Is a sample eligibility statement available on the website? What will it look like?

**Answer:** If selected for funding, applicants will have to attest that the bus to be replaced meets all existing bus eligibility requirements (as described in Section III.D of the Notice of Funding Opportunity) in a signed eligibility statement. The sample eligibility statement is not yet available. The eligibility statement will include each vehicle make, vehicle model, vehicle model year, vehicle identification number, odometer reading, engine make, engine model, engine model year, EPA family, engine ID or serial number, and vehicle registration/licensing number and state. Applicants will also have to attest that:

- The existing vehicle is fully operational at the time of application. Operational vehicles should be able to start, move, and have all necessary parts to be operational.
- The existing vehicle provided bus service to a public school district for at least 3 days/week on average during the 2022/2023 school year at the time of applying, excluding COVID-related or disaster-related school closures.

Date Posted: 8/21/2023

**6.67**: For listing annual idling hours in the Application Fleet Sheet, is there a specific formula applicants should use to calculate the number of hours?

**Answer:** "Idling hours" refers to short-term idling of the main engine when the school bus is queuing or stationary. There is no specific formula that applicants should use to calculate annual idling hours. Applicants should use their best estimate.

Date Posted: 8/21/2023

**6.68**: Does the "number of buses serving the district" on the utility partnership document reference the number of the buses in the district fleet overall or the number of buses the district is applying to replace?

**Answer:** In the second column of the first table, please provide the number of buses and chargers requested in your application; in the third column please provide the number of buses and chargers already in your electric fleet.

**6.69**: Will an application still be accepted if some of the requested information on the Applicant Fleet Sheet is unknown and therefore left blank?

**Answer:** Yes. Applicants must provide, to the best of their ability, a detailed description of the specific vehicles to be implemented under the proposed project. The purpose of the applicant fleet description is to describe in detail the specific vehicles targeted for emissions reductions as well as any installation of charging equipment to be implemented under the proposed project. Information provided in the applicant fleet sheet will be used to help determine project eligibility. A blank field will not automatically disqualify an application. If the project is selected for funding, grantees can work with their EPA Project Officer to complete necessary information on a case-by-case basis.

Date Posted: 8/21/2023

**6.70**: On the SF-424, what should applicants enter as the "date received" in Question #3?

**Answer:** Applicants should leave this field blank. This date will be completed electronically when submitted via <u>Grants.gov</u>.

Date Posted: 8/21/2023

**6.71**: For the Section 10 Budget Table, Indirect Costs, does the Federal Negotiated Indirect Cost Rate need to be used?

**Answer:** Applicants may, but are not required to, include indirect costs in their budget. If applicants choose to include indirect costs in their budget, and are selected, they will need to submit a copy of their current indirect cost rate that has been negotiated with a federal cognizant agency prior to award. Please see 2 CFR § 200.414 and <a href="https://www.epa.gov/grants/indirect-cost-rate-proposal-information">https://www.epa.gov/grants/indirect-cost-rate-proposal-information</a> for more information on indirect cost requirements.

Date Posted: 8/21/2023

**6.72**: On the SF-424, how do applicants complete Question #18. Estimated Funding?

**Answer:** Each applicant must prepare their own project budget for the project narrative, SF-424, and SF-424A. For SF-424 Question #18, enter the EPA funding requested amount in the "Federal" box. Program income might apply if applicants plan to sell disabled engines, disabled vehicles, disabled equipment, or parts. Note, applicants should not include additional external funds or applicant funds in the project budget on the SF-424 or SF-424A. In other words, applicants should not list funding under the "Applicant," "State," "Local," or "Other" fields.

Date Posted: 8/21/2023

**6.73**: On the Applicant Fleet Sheet, what option should applicants select if they are replacing a gasoline powered bus?

**Answer:** Please select "LNG" and then add a comment bubble to the cell explaining that the real fuel type is gasoline.

**6.74**: Where should engineers and those who install infrastructure be listed in an application?

**Answer:** Costs for services of contractors (including individual consultants) should be included in the "Contractual" category in the budget table in Section 10a, Budget Detail, of the Project Narrative. Contractual services (including consultant services) are those services to be carried out by an individual or organization, other than the applicant, in the form of a procurement relationship. Installers should not be listed in the staff expertise or project partner tables in Section 5a, Staff Expertise, of the Project Narrative.

Date Posted: 8/21/2023

**6.75**: On the SF-424, how should applicants fill out questions 1 and 2?

**Answer:** Applicants should select "Application" for type of submission (question 1) and "New" for type of application (question 2).

Date Posted: 8/21/2023

**6.76**: Should External Leveraged Costs be included in the total amount column in the budget table included in the project narrative?

**Answer:** Yes, the total amount column in the budget table should be the sum of EPA Funding Requested, Applicant Costs, and External Leveraged Costs. Note that Applicant Costs and External Leveraged Costs should not be included on the SF-424 or SF-424A.

Date Posted: 8/21/2023

**6.77**: In the Project Narrative, may applicants delete template descriptions or instructions that they deem unnecessary in their application?

**Answer:** Yes, applicants should delete template descriptions and instructions as needed to maximize space. Note, EPA highly recommends that applicants follow the format of the sample project narrative and provide the information described in each section as much as possible, especially for the areas in the sample narrative that say "required."

Date Posted: 8/21/2023

#### 6.78: Can EPA provide examples of community engagement for this project?

**Answer:** Applicants should describe the quality and extent to which the project addresses engagement with communities and/or populations that would be affected by the proposed project, especially local residents, to ensure their meaningful participation with respect to the design, planning, and performance of the project. In addition, EPA has selected 17 Environmental Justice Thriving Communities Technical Assistance Centers (EJ TCTACs) in partnership with the U.S. Department of Energy. These centers will provide guidance on community engagement, meeting facilitation, and translation and interpretation services for limited English-speaking participants. For more information on EJ TCTACs, please refer to <a href="https://www.epa.gov/environmentaljustice/environmental-justice-thriving-communities-technical-assistance-centers">https://www.epa.gov/environmentaljustice/environmental-justice-thriving-communities-technical-assistance-centers</a>.

**6.79**: On SF-424A, should applicants include the cost of the buses as "equipment" on page 2?

**Answer:** Yes.

Date Posted: 8/21/2023

**6.80**: Under Section 5a, Past Performance, of the Project Narrative, can applicants include any federal funds that have been awarded, or only those used for capital improvements or infrastructure?

**Answer:** Applicants may list any federal funding that shows their ability to successfully complete the proposed project and/or manage federal funds.

Date Posted: 8/21/2023

**6.81**: What is the difference between the project partner and staff expertise tables in Section 5c, Staff Expertise, of the Project Narrative? Is a school district a project partner?

Answer: In the project partner table, applicants should list all supporting organizations and individuals that are external to the applicant organization and have or will participate in or directly assist in the design and performance of the project. In a Third-Party Sub-Program application, the school district is the beneficiary and a project partner. Applications may also choose to list project partners such as private bus contractors, local environmental groups, consultants, etc. In the staff expertise table, applicants should list relevant knowledge, expertise, qualifications, and resources of the applicant organization's in-house staff members that may help in the achievement of the proposed project's goals. In addition, biographical sketches, including resumes or curriculum vitae for key staff, managers and any other key personnel can be included as an optional project team biography attachment, as listed in Section IV.A of the Notice of Funding Opportunity (NOFO); the optional attachment does not count towards the 15-page limit of the project narrative.

Date Posted: 8/21/2023

**6.82**: In Section 5c, Staff Expertise, of the Project Narrative, does % FTE refer to the amount of time staff works in their typical role or the time that will be spent on this specific project?

**Answer:** The full-time equivalent (FTE) is the percentage of full-time hours that a staff member will spend on tasks for the proposed project to be completed with CSB Grant Program funding. *Date Posted:* 8/21/2023

**6.83**: In the table in Section 4, Project Location – Nonattainment or Maintenance Area(s), of the Project Narrative, should the applicant list the NCES ID and school district name for each school district to be served by the replacement buses or the NCES ID and school district name of just the Nonattainment or Maintenance Area(s) that the replacement buses will serve?

**Answer:** The applicant should list the NCES IDs of all school districts that the replacement buses will serve, using the last column, "Nonattainment or Maintenance Area" to indicate whether each school district is a nonattainment or maintenance area ("Yes") or not ("No").

**6.84**: If applicants are experiencing technical issues that they are unable to resolve prior to the application deadline, are they unable to submit an application?

**Answer:** If applicants experience technical issues during the submission of an application that they are unable to resolve, follow these procedures before the application deadline date:

- a. Contact Grants.gov Support Center before the application deadline date.
- b. Document the **Grants.gov** ticket/case number.
- c. Send an email with "Clean School Bus Grant Program" in the subject line to <a href="mailto:cleanschoolbus@epa.gov">cleanschoolbus@epa.gov</a> before the application deadline time and date and include the following:
  - i. <u>Grants.gov</u> ticket/case number(s)
  - ii. Description of the issue
  - iii. The entire application package in PDF format.

Without this information, EPA may not be able to consider applications submitted outside of <u>Grants.gov</u>. Any application submitted after the application time and date deadline will be deemed ineligible and will not be considered. Where possible, EPA encourages applicants to submit applications well before the deadline to ensure they have enough time to resolve any technical issues.

Date Posted: 8/21/2023

**6.85**: What performance measures should be included in the application?

**Answer:** Performance measures are the mechanism to track, measure, and report progress towards achieving the expected outputs and outcomes. Applicants should see Sections I.C and VI.B of the Notice of Funding Opportunity (NOFO), and Section 2 - Environmental Results - Outputs, Outcomes, and Performance Measures of the Project Narrative for example outputs, outcomes, and performance measures.

Date Posted: 8/21/2023

**6.86**: Is a letter signed by an applicant's Chief Financial Officer (CFO) sufficient to demonstrate their commitment to providing leveraged resources?

Answer: Yes.

Date Posted: 8/21/2023

**6.87**: On SF-424, are questions 4, 5a, 5b, and 13 necessary to complete? And if so, can you please elaborate on what is needed in these fields?

**Answer:** Applicants will need to enter an Applicant Identifier (4), Federal Entity Identifier (5a), Federal Award Identifier (5b), and Competition Title or Number (13), all of which can be found in the SF-424 application form on Grants.gov.

**6.88**: If an applicant submitted their application prior to the deadline, will they have the ability to resubmit information upon EPA's review if sections or attachments were incorrectly filled out?

**Answer:** No. As of the 11:59 p.m. (ET) deadline on Tuesday, August 22, 2023, the application review process began, and changes cannot be made to applications. If necessary, EPA may contact applicants with clarifying questions during the application review period, and, if selected, the EPA project officer may work with the grantee to update information.

Date Posted: 12/21/2023

**6.89**: Does the California Electric School Bus Technician Training meet the training requirements for Electric Vehicle Supply Equipment (EVSE) installers?

**Answer:** The California Electric School Bus Technician Training does not meet the training requirements for EVSE installers because it was not developed as part of a national guideline standard approved by the Department of Labor in consultation with the Department of Transportation. Currently, EVITP is the only training program that meets the training requirements for EVSE installers under the CSB Program.

Date Posted: 12/21/2023

### 7. Selection and Notification

7.1: How are applicants selected for funding?

**Answer:** Applications will first be evaluated against the threshold factors listed in Section III.C of the Notice of Funding Opportunity (NOFO). Only those applications which meet all of the threshold factors will move on to the next step of the review process. Applications that meet all of the threshold factors will then be reviewed by regional review panels using the evaluation criteria in Section V.A of the NOFO. Each application will be given a numerical score and will be rank ordered by the review panel. Preliminary funding recommendations will be provided to the EPA selection official based on these reviews and rankings. Final funding decisions will be made by the EPA selection official based on the rankings and preliminary recommendations of the EPA evaluation team and the other factors such as geographic diversity of funds, the number and size of awards, environmental benefits, applicability of different business models, and other Agency and programmatic priorities.

Date Posted: 6/5/2023

**7.2**: Will applications submitted by public school districts be given priority over applications submitted by bus dealers?

**Answer:** No. Although the School District Sub-Program and Third-Party Sub-Program are being announced under a single Notice of Funding Opportunity (NOFO), applications for each sub-program will be reviewed separately, and separate ranking lists will be developed. School District Sub-Program applications will be reviewed, ranked, and selected by one review panel, and Third-Party Sub-Program applications will be reviewed, ranked, and selected by a separate review panel.

Date Posted: 6/5/2023

#### **7.3**: Are EPA funds being allocated on a regional or state basis?

**Answer:** FY23 Clean School Bus Grants funds are being allocated on a regional basis. See Section II.B of the Notice of Funding Opportunity (NOFO) for more information about the FY23 CSB Grants regional allocations.

Date Posted: 6/5/2023

### **7.4**: When will the grant be awarded?

**Answer:** EPA currently anticipates awarding 2023 CSB Grants between February and March 2024.

Date Posted: 6/22/2023

# **7.5**: Please clarify the difference in roles of the EPA Regional offices vs. EPA Headquarters in the selection process.

**Answer:** Applications will be reviewed by regional review panels, and final funding decisions will be made by the EPA selection official. See Question 7.1 for more information on how applicants are selected for funding. Assistance agreements funded under this announcement will be awarded and managed by each of EPA's ten Regional offices, depending on the location of the project. For more information on the selection process, please see Section V.B of the Notice of Funding Opportunity (NOFO).

Date Posted: 6/22/2023

### **7.6**: Is partial funding ever awarded?

**Answer:** Yes. EPA reserves the right to partially fund applications by funding separate portions or phases of proposed projects. If EPA decides to partially fund an application, it will do so in a manner that does not prejudice any applicants or affect the basis upon which the application, or portion thereof, was evaluated and selected for award, thereby maintaining the integrity of the competition and selection process.

Date Posted: 6/22/2023

## **7.7**: What is the anticipated date range for applicants to receive the notification of award selection?

**Answer:** EPA currently anticipates notification of selection to occur between November 2023 and January 2024.

Date Posted: 6/22/2023

### 7.8: Does a cost share make an application more competitive?

**Answer:** Although cost sharing/matching is not required under this competition, EPA will award evaluation points, under Section V.A of the Notice of Funding Opportunity (NOFO), for applicants that demonstrate that they have leveraged or plan to leverage additional external funds in order to support the proposed project activities.

Date Posted: 7/10/2023

**7.9**: In scoring applications, how will extra costs like solar, storage, or two-way chargers be reconciled against the importance of cost-effectiveness?

**Answer:** Applicants are evaluated based on the criteria defined in Section V.A of the Notice of Funding Opportunity (NOFO). Specifically, under the "Budget" criterion, EPA will evaluate applicants based on the extent and quality to which:

- A. The proposed budget provides a detailed breakout by funding type in the proper budget category for each activity the applicant is requesting funding;
- B. The applicant's approach, procedures, and controls will ensure that awarded grant funds will be expended in a timely and efficient manner; and
- C. The proposed costs are reasonable to accomplish the proposed goals, objectives, and measurable environmental outcomes.

Date Posted: 7/10/2023

**7.10**: During the application review process, will EPA's evaluation take into account that applicants in the School District Sub-Program may not have sufficient access to grant writing assistance and therefore may be at a disadvantage in terms of "quality" of their application?

**Answer:** Although the School District Sub-Program and Third-Party Sub-Program are being announced under a single Notice of Funding Opportunity (NOFO), applications for each sub-program will be reviewed separately, and separate ranking lists will be developed. School District Sub-Program applications will be reviewed, ranked, and selected by one review panel, and Third-Party Sub-Program applications will be reviewed, ranked, and selected by a separate review panel. Please also note that EPA's Grants Office offers training and competition resources at <a href="https://www.epa.gov/grants/epa-grants-overview-applicants-and-recipients">https://www.epa.gov/grants/epa-grants-overview-applicants-and-recipients</a>. Please see Questions 2.21 and 6.21 for additional grant-writing tools, trainings, and resources.

Date Posted: 7/10/2023

**7.11**: How did EPA determine the regional allocations for the EPA Regions listed in Table 2, section II.B. of the Notice of Funding Opportunity (NOFO)?

**Answer:** EPA considered several internal and external factors in determining regional allocations, including factors such as the number of public school children per Region.

Date Posted: 7/14/2023

**7.12**: For third-party applications, do all school district beneficiaries need to be of similar nature with respect to the evaluation criteria (e.g., Project Location, Prioritization, Programmatic Capability and Past Performance)?

**Answer:** No, school district beneficiaries may represent a combination attainment and non-attainment and/or maintenance areas, as well as prioritized and non-prioritized districts. Partial points may be awarded depending on the percentage of time and buses that operate in Ozone or PM2.5 nonattainment or maintenance areas and/or the number of buses serving prioritized districts. Note, the Programmatic Capability and Past Performance criteria is not dependent on school district beneficiaries; under this criteria EPA is evaluating the applicant itself (in this case, the third party).

Date Posted: 7/14/2023

**7.13**: Are the optional attachments, such as the leveraged resources commitment letter and partnership letters, considered in the scoring of the evaluation criteria?

Answer: Applications will be reviewed using the evaluation criteria in Section V.A of the Notice of Funding Opportunity (NOFO). If applicable, applicants may include, as attachments to the application, commitment letters from or signed by project partners who are providing additional external funding that the applicant has leveraged or plans to leverage in order to support proposed project activities. In addition, EPA will consider letters of support from project partners that demonstrate strong, long-term involvement throughout the project. Letters should specifically indicate how project partners and supporting organizations will participate in or directly assist in the design and performance of the project, or how obtaining support from project partners will allow the applicant to more effectively perform the project. Applicants should, in their narrative, be clear how the letters relate to the evaluation criteria. Letters should be addressed to the applicant organization and included as attachments to the application (use the "Other Attachments" form in Grants.gov). Letters submitted by partners directly to EPA will not be accepted.

Date Posted: 7/14/2023

**7.14**: For third-party applicants, is it possible for EPA to only fund some of the school districts in the application while not funding other districts in the application?

**Answer:** EPA reserves the right to partially fund applications by funding separate portions or phases of proposed projects. If EPA decides to partially fund an application, it will do so in a manner that does not prejudice any applicants or affect the basis upon which the application, or portion thereof, was evaluated and selected for award, thereby maintaining the integrity of the competition and selection process.

Third-party applicants must submit documentation, such as the Third-Party Approval Certification Template, that the school districts being served are aware and approve of the third party's application. Documentation must be signed by an authorized representative of the school district beneficiary. Note, third-party applicants that do not submit signed approval certifications for at least four school district beneficiaries will be ineligible for funding; school districts not supported by a Third-Party Approval Letter or other documentation will not count towards eligibility. Third-party applicants will only be considered for funding for school district beneficiaries that have signed the approval certification. Thus, if a third-party application listed more than four school district beneficiaries but only provided signed documentation of approval by four of the school district beneficiaries, EPA could fund the application only for those districts with a signed documentation of approval (assuming those four districts met the other eligibility requirements, including the 25-bus minimum).

Date Posted: 7/20/2023

**7.15**: Will the Location - Nonattainment or Maintenance Areas evaluation criterion be scored on an all points or no points awarded basis? If a location was previously designated, was very close to a standard limit, or can cite other environmental concerns unique to their location, will they be given partial points?

Answer: Points are awarded under Section 4 (Location – Nonattainment or Maintenance Area) for projects that are located in an Ozone or PM2.5 nonattainment or maintenance area, as listed on the Priority Area List at <a href="https://www.epa.gov/system/files/documents/2023-04/fy23-csb-grant-priority-area-list-2023-04.pdf">https://www.epa.gov/system/files/documents/2023-04/fy23-csb-grant-priority-area-list-2023-04.pdf</a>. Points will not be awarded for buses in project locations not on this list. Partial points may be awarded depending on the percentage of time and buses that operate in an Ozone or PM2.5 nonattainment or maintenance area. If a single application includes vehicles operating in more than one project location, the applicant should indicate in Section 4 of the workplan where the vehicles operate and the amount (%) of time the vehicles typically operate in each area. For more information on completing Section 4 of the application, see Section IV.B of the Notice of Funding Opportunity (NOFO).

Date Posted: 7/20/2023

**7.16**: How will the funding amount be determined if two applications have the same score and there's not enough funding remaining to fully fund both?

**Answer:** Each application will be given a numerical score and will be rank ordered by the review panel. Final funding decisions will be made by the EPA selection official based on the rankings and preliminary recommendations of the EPA evaluation team as well as other factors such as geographic diversity of funds, number and size of awards, environmental benefits, applicability of different business models, and other Agency and programmatic priorities. Once final decisions have been made, a funding recommendation will be developed and forwarded to the EPA award official. Note, EPA reserves the right to partially fund applications by funding separate portions or phases of proposed projects (see Question 7.6 for more information). *Date Posted:* 8/17/2023

**7.17**: Will EPA consider project partners' experience with federally funded assistance agreements under Section 5.A and 5.B of the Project Narrative if those partners provide partnership letters?

**Answer:** No, the "federally-funded assistance agreements" discussed under Section 5.A and 5.B of the Project Narrative must be awards directly to the applicant. Note, applicants that do not have any relevant or available past performance or reporting information and that indicate this in the application will receive a neutral score for sub-criteria A and B (a neutral score is half of the total points available in a subset of possible points). Please see Questions 6.12 and 6.25 for more information on submitting partnership letters.

Date Posted: 8/17/2023

7.18: Will EPA need peer reviewers for the 2023 CSB Grant Applications?

**Answer:** No. Applications will be reviewed by the EPA evaluation team.

**7.19**: Will EPA offer debrief meetings with unsuccessful applicants to better understand how they can improve their application for future grant programs?

**Answer:** Yes. Instructions on requesting a debrief after the competition will be included in the notification to unsuccessful applicants from EPA.

Date Posted: 8/21/2023

**7.20**: Will EPA release the total number of applications received in each sub-program and each EPA Region, and the total number of buses requested?

**Answer:** EPA is currently reviewing application materials; at a future date EPA may share summary information on the 2023 Grant Program in documents such as future Reports to Congress or other materials. These materials will be made available on EPA's CSB website.

Date Posted: 12/21/2023

**7.21**: Will the 2023 Clean School Bus Rebate program open before or after grant awards are announced?

**Answer:** The 2023 Clean School Bus Rebates launched on September 28, 2023. EPA currently expects to announce the 2023 Clean School Bus Grant program awards in late 2023 or early 2024.

Date Posted: 12/21/2023

**7.22**: Is there a publicly accessible raw data file of the grantees? What format is it available in? **Answer:** The raw dataset of grantees is available as an Excel spreadsheet at <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-program-awards#grants-map">https://www.epa.gov/cleanschoolbus/clean-school-bus-program-awards#grants-map</a>. Under the interactive map, the dataset can be downloaded by selecting the gray down arrow at the top right of the project- and district-level data tables. Note that the webpage with the interactive map has information about the data that is important to review prior to conducting any analyses.

\*\*Date Posted: 5/10/2024\*\*

**7.23**: Is there any data available to the public on applicants and recipients of the 2023 Grant program beyond the prioritization and self-certification lists?

**Answer:** The <u>Clean School Bus Program Awards webpage</u> contains an interactive map and data table with data for the awarded grant recipients for 2023. Users have the ability to see the grantee name, project title, EPA Region, total funding awarded, number of buses, and school district prioritization status.

Date Posted: 5/10/2024

**7.24**: Is there a waitlist for the 2023 Grant program?

**Answer:** No. Applicants not selected for funding in the 2023 CSB Grant program can look forward to future CSB funding opportunities Details on future funding opportunities will be announced on the CSB website and via the CSB listserv.

Date Posted: 5/10/2024

**7.25**: Where can I find the list of grant award selectees?

**Answer:** Details about the tentatively selected applicants can be viewed at <a href="https://www.epa.gov/cleanschoolbus/clean-school-bus-program-awards">https://www.epa.gov/cleanschoolbus/clean-school-bus-program-awards</a>. Note: the information on grant awards is currently displayed by the project and school district. As grantees finalize their workplans, this information will be updated.

Individual selectees should work with their EPA Project Officer to understand where they are in the process to finalize their award.

Date Posted: 7/24/2024

### 8. Scrappage, Sale, or Donation of Old Buses

**8.1**: Is there a scrappage requirement?

Answer: There is a scrappage requirement for the vast majority of applicants; applicants with model year 2010 and older buses must scrap a bus for each new replacement bus funded by the CSB Program. Please see Section III.D of the Notice of Funding Opportunity (NOFO) for more details on scrappage requirements. Scrappage is a key component of this program as it reduces the number of diesel buses in use and avoids pollutants they would have emitted. In a limited number of circumstances, at the time of application, applicants applying through the School District Sub-Program may request an exception of the bus scrappage requirement. EPA will review and approve an exception request of the bus scrappage requirement on a case-by-case basis. To be approved for the waiver, applicants must: (1) be prioritized as low income; AND (2) be seeking to purchase only zero-emission buses; AND (3) be currently contracting with a private fleet that owns school buses for their school transportation services and the school plans to own the new buses; AND (4) attest, in the Budget Detail section of the Project Narrative, that the current contract provider is unwilling or unable to replace buses with zero-emission buses. Third-party applicants are not eligible to apply for this scrappage exception.

Date Posted: 6/5/2023

**8.2**: How do applicants request a waiver of the bus scrappage requirement?

**Answer:** In the Budget Detail section of their application, applicants should include a simple attestation that they meet the criteria provided in Section III.D of the Notice of Funding Opportunity (NOFO).

Date Posted: 7/10/2023

8.3: Can propane buses be scrapped in the 2023 Clean School Bus Grant Program?

**Answer:** If a fleet has no eligible 2010 or older diesel school buses and is requesting zero-emission school bus replacements, the fleet owner can either (1) scrap 2010 or older non-diesel internal combustion engine buses, including propane-powered buses; or (2) scrap, sell, or donate 2011 or newer non-diesel internal combustion engine buses. Please see section III.D.I of the Notice of Funding Opportunity for additional details on eligible existing school buses.

Date Posted: 8/17/2023

**8.4**: What are the requirements for how to scrap a bus?

**Answer:** Buses being scrapped must be permanently disabled within the grant period of performance by:

- 1. Cutting a three-inch-by-three-inch hole in the engine block (the part of the engine containing the cylinders) and cutting or crushing one chassis rail between the axles is the preferred scrapping method. Other acceptable scrappage methods may be considered and will require prior EPA approval. Recipients seeking approval for alternative scrappage methods must submit an alternative scrappage plan to the regional project officer detailing how the method will destroy and/or disable the engine and must, if approved, comply with the evidence requirements listed below, including digital photos.
- 2. Disabling the chassis may be completed by cutting through the frame/frame rails on each side at a point located between the front and rear axles. Other acceptable scrappage methods may be considered and will require prior written approval from the EPA project officer.
- 3. Equipment and vehicle components that are not part of the engine or chassis may be salvaged from the unit being replaced (e.g., plow blades, shovels, seats, tires, etc.). If disabled engines, disabled vehicles, disabled equipment, or parts are to be sold, program income requirements apply.
- 4. Evidence of appropriate disposal is required in a final assistance agreement report submitted to EPA. Note that in a limited number of circumstances, at the time of application, applicants applying through the School District Sub-Program may request an exception of the bus scrappage requirement. See Question 8.1 for more details.

Date Posted: 8/17/2023

Date Posted: 8/21/2023

**8.5**: Can a school district receive the scrappage waiver under the School District Sub-Program if they are also, separately, beneficiaries of a Third-Party Sub-Program application?

**Answer:** EPA will consider the scrappage waiver request for the buses listed under the School District Sub-Program even if the school district is also a beneficiary in the Third-Party Sub-Program. The school buses listed on the third-party application will not be eligible for a scrappage waiver. If selected for funding, then EPA may ask for details on how the grantee meets the fourth criterion (d) of the scrappage waiver (attesting that "the current contract provider is unwilling or unable to replace buses serving the district with ZE school buses").

**8.6**: Under the Third-Party Sub-Program, may a school district's transportation contractor donate buses to the school district to meet the scrappage requirement?

**Answer:** Buses to be replaced in a Third-Party Sub-Program application must adhere to the scrappage requirements listed in Section III.D.1 of the Notice of Funding Opportunity (NOFO). However, please note that the bus being replaced does not need to be owned by the same entity that will own the new bus. Nor does either bus (the scrapped or replacement bus) need to be owned by the school district beneficiary listed on the third-party application. See Questions 2.33 and 2.34 for more information on how third parties can pass funding to school district beneficiaries and/or their transportation contractors.

**8.7**: If awarded funding, could an educational collaborative or third-party applicant implement the replacement buses at one priority school district that they service and scrap buses from another, non-priority school that they service?

**Answer:** Yes. The public school district served by the existing bus(es) does not have to be the same as the public school district that will be served by the new bus(es), and they do not need to have the same prioritization status. Note that the maximum per-bus funding levels and the Environmental Justice and Disadvantaged Communities evaluation criteria points are based on the prioritization status of the school district to be served by the new school bus(es).

Date Posted: 8/21/2023

8.8: May a non-eligible entity receive a donation of a bus being replaced under this program?

**Answer:** Yes, however, EPA cannot facilitate donations of buses that are being replaced and will not be involved in any agreement between the bus donor and bus donation recipient. Please refer to Section III.D.1 of the NOFO for details on buses that can be donated versus those that must be scrapped, including model year requirements.

Date Posted: 8/21/2023

**8.9**: Are scrap yards required to keep the scrapped buses for a certain amount of time after they destroy them?

**Answer:** No. For more information on the scrappage requirements, please see Question 8.4 and Section III.D.4.i of the NOFO.

Date Posted: 12/21/2023

### 9. Terms and Conditions

### 9.a. General

**9.a.1**: What standard must chargers meet?

**Answer:** All AC Level 2 charging infrastructure purchased under this program must be EPA ENERGY STAR certified chargers. EPA strongly recommends that all other charging infrastructure (e.g., DC Fast chargers) funded under this program be listed by Nationally Recognized Testing Laboratory (NRTL).

Date Posted: 6/5/2023

**9.a.2**: If a school district contracts with a private fleet for student transportation, can the charging equipment be installed on school property?

**Answer:** Yes. Grantees may use grant funding to install eligible charging equipment for the buses on school property even if the school district does not own the new buses. In the case where a private fleet uses charging equipment installed on school district property, the private fleet should exercise caution to ensure that the charging infrastructure will continue to be available to the CSB-funded bus for at least 5 years from the date of bus delivery, even if the contract between the school district and the private fleet ends before that time. Charging infrastructure should be used primarily by buses obtained through the Clean School Bus Grants Program, but may also be used by other vehicles.

Date Posted: 6/5/2023

**9.a.3**: Can charging equipment be installed at locations outside the school property that it will serve (such as third-party off-site charging hubs)?

Answer: Yes. Grantees may use grant funding to install eligible charging equipment for the buses, including at locations outside the school property. School districts using EPA funds to install charging infrastructure at offsite locations should exercise caution to ensure that the charging infrastructure will continue to be available to the CSB-funded bus for at least 5 years from the date of bus delivery. For example, school districts can use grant funds to work with a utility that will ultimately own the charging infrastructure, as long as the charging infrastructure will continue to be available to the CSB-funded bus for at least 5 years from the date of bus delivery. Grantees may use funding to install eligible charging equipment for the buses, design and engineering costs, and installation costs such as trenching, wiring and electrical upgrades, labor, and permitting. Grantees may not, however, use funding for charging fees or services for third-party off-site charging hubs. Charging infrastructure should be used primarily by buses obtained through the Clean School Bus Grants Program, but may also be used by other vehicles.

Date Posted: 6/5/2023

**9.a.4**: What qualifications do electricians need to meet if they are installing charging infrastructure under the 2023 Clean School Bus (CSB) Grant Program? Is this requirement the same as the 2022 CSB Rebates?

Answer: All electricians installing, operating, or maintaining EVSE must meet one of the following requirements: (i) Certification from the Electric Vehicle Infrastructure Training Program (EVITP), OR (ii) Graduation or a continuing education certificate from a registered apprenticeship program for electricians that includes charger-specific training and is developed as part of a national guideline standard approved by the Department of Labor in consultation with the Department of Transportation. For projects requiring more than one electrician, at least one electrician must meet these requirements, and at least one electrician must be enrolled in an electrical registered apprenticeship program. This requirement is new for the 2023 CSB Grant Program. In limited circumstances, EPA may provide an exception to the above requirements for grantees that can demonstrate there are no electricians meeting the above requirements available in their area, and that efforts to train local electricians to meet the requirements are not feasible (see details in Section III.D of the Notice of Funding Opportunity (NOFO)). Eligible costs can include training to certify licensed electricians to install EVSE, such as certification through the Electric Vehicle Infrastructure Training Program (EVITP).

Date Posted: 6/22/2023

**9.a.5**: Can charging infrastructure be installed at the homes of bus drivers if the school district does not have a bus depot?

**Answer:** School districts can use grant funds to install charging equipment for the buses at locations outside of school property, including at the homes of bus drivers. School districts using EPA funds to install charging infrastructure at private homes should exercise caution to ensure that the charging infrastructure will continue to be available to the grant-funded bus for at least 5 years from the date of bus delivery.

Date Posted: 6/22/2023

**9.a.6**: Can applicants start the competitive procurement process prior to submitting an application?

**Answer:** Yes. However, purchases may not be made until after an award is made.

Date Posted: 7/14/2023

**9.a.7**: In the 2023 Clean School Bus (CSB) Grant Program: Prioritization Self-Certification Instructions, EPA states, "All school buses requested in the application will continue to primarily serve the specific school(s) identified in the application (i.e., sub-group) as required by the terms and conditions of the award." Could EPA please define "primarily serve?"

**Answer:** Buses must serve the school district the majority of the time, but the bus can also be used occasionally for other purposes and/or occasionally serve other school districts.

Date Posted: 7/14/2023

9.a.8: Can applicants use public or private lending firms for financing school buses?

**Answer:** Yes. If financing is necessary, the purchase should be financed with a conventional purchase loan.

Date Posted: 7/14/2023

**9.a.9**: Will applicants be allowed to name partners in the application and satisfy federal competitive procurement requirements?

Answer: It depends. If the applicant is a school district, all goods and services must meet the federal competitive procurement requirements in 2 CFR Part 200. Simply naming a vendor as a partner is not sufficient to meet the procurement requirements. If the direct applicant is a third-party, the purchasing school districts do not need to compete their purchases from the third-party applicant. The competitive nature of the grant program and the pre-existing partnership agreement between the district and the applicant justifies non-competitive procurement of products sold by the applicant. Any other goods and services purchased by the applicant are subject to federal competitive procurement requirements. If an applicant awards a subaward to a subrecipient to carry out part of the program, subrecipients (e.g., school district subrecipients or the private bus fleets serving the school district subrecipients) must also comply with 2 CFR Part 200 for purchasing any other goods and services besides those offered by the third-party applicant. However, if an applicant awards participant support costs (e.g., rebates) to purchase vehicles and equipment, the beneficiary is not subject to 2 CFR Part 200 and the federal competitive procurement requirements.

Section V of the announcement describes the evaluation criteria and evaluation process that will be used by EPA to make selections under this announcement. During this evaluation, except for those criteria that relate to the applicant's own qualifications, past performance, and reporting history, the review panel will consider, as appropriate and relevant, the qualifications, expertise, and experience of an applicant's named contractor(s), including consultants, identified in the application if the applicant demonstrates in its application that the contractor(s) was selected in compliance with the competitive procurement requirements in 2 CFR 200.319 and 2 CFR 200.320. For example, an applicant must demonstrate that it selected the contractor(s) competitively or that a proper non-competitive sole-source award consistent with the regulations will be made to the contractor(s), that efforts were made to provide small and disadvantaged businesses with opportunities to compete as provided in 40 CFR 33.301, and that some form of cost or price analysis was conducted. EPA may not accept sole source justifications for

contracts for services or products that are otherwise readily available in the commercial marketplace. EPA will not consider the qualifications, experience, and expertise of named subrecipients and/or named contractor(s) during the application evaluation process unless the applicant complies with these requirements. For additional guidance applicants should review EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements.

Date Posted: 8/17/2023

9.a.10: Are school districts required to conduct an efficiency study prior to applying for funding?

**Answer:** No, school districts are not required to conduct an efficiency study prior to applying for funding. EPA does encourage applicants to discuss their proposed project with their local utility and has provided a template form to facilitate that discussion. The Joint Office of Energy and Transportation is also available to support applicants conducting analyses, such as a route analysis, that may be informative for project planning. Potential applicants can also contact JOET technical assistance by emailing <a href="mailto:cleanschoolbusTA@nrel.gov">cleanschoolbusTA@nrel.gov</a>.

Date Posted: 8/17/2023

**9.a.11**: Is there a requirement for how many days per week new electric buses obtained with CSB funding must run?

**Answer:** There is not a days per week usage requirement for the new bus. The new bus must serve the school district listed on the application for at least five years from the date of delivery, unless the award is to an eligible contractor and the contract with the school district ends before the end of the 5-year period, in which case those school buses may be operated as part of another school district eligible for the same or higher priority consideration. Note, however, the existing buses to be replaced must have run at least 3 days per week on average during the 2022/2023 school year.

Date Posted: 8/17/2023

**9.a.12**: If an EV infrastructure company applies through the Third-Party Sub Program, do the school district beneficiaries need to conduct a competitive procurement process even though they have an agreement with the EV infrastructure company in place?

**Answer:** The school district partners do not need to compete their purchases from the third-party applicant. The competitive nature of the grant program and the pre-existing partnership agreement between the district and the applicant justifies non-competitive procurement of products sold by the applicant. However, any other goods and services (e.g., the new school buses) purchased by the applicant or its subgrantees (e.g., the school district) are subject to competitive procurement. Simply naming a partner in the application does not satisfy the competitive procurement requirements. Please see Question 9.a.9 for more information on the competitive procurement process. In additional to any federal requirements under the grant, the replacement buses will need to be purchased in compliance with applicable state, tribal, or local procurement laws.

**9.a.13**: How should applicants complete the Fleet Description if the engine label with the serial number is unreadable?

**Answer:** Applicants should complete as much of the Fleet Description as possible. If the project is selected for funding, grantees can work with their EPA Project Officer to determine sufficient engine documentation when the engine plate is missing or unreadable. Please note, often the engine manufacturer can assist in obtaining engine information as well.

Date Posted: 8/17/2023

**9.a.14**: What is the process to waive the certification requirement of the electrician who will be installing the EV infrastructure?

Answer: In limited circumstances, EPA may provide an exception to the electrician certification requirements for grantees that can demonstrate there are no electricians meeting the requirements available in their area, and that efforts to train local electricians to meet the requirements are not feasible. Applicants requesting a waiver for certification for the electrician installing the EV infrastructure buses will need to send a written statement to <a href="mailto:cleanschoolbus@epa.gov">cleanschoolbus@epa.gov</a> explaining that there are no electricians in their area that meet the electrician certification requirements and why efforts to train local electricians to meet the requirements are not feasible. This waiver request is not required at the time of application.

Date Posted: 8/21/2023

**9.a.15**: Under the Third-Party Sub-Program, who owns the buses purchased with the grant funds after the end of the project period?

**Answer:** Ownership will depend on the contractual agreement between the third-party, the school district beneficiary, and any additional parties (e.g., private bus fleets) involved in the project. EPA will not be involved in any contractual arrangements between these parties. For example, an OEM applicant could use the CSB funding to provide a point-of-sale discount on the new buses to a school district beneficiary or to a private fleet that serves the school district beneficiary. In that case, the bus would likely be owned by the party purchasing the bus. See Questions 2.11, 2.34, and 3.24 for additional examples of how third-party applicants can pass funding to school district beneficiaries and/or the private bus fleets that serve them. Note, the new bus(es) must continue to serve the school district listed on the application for at least 5 years from the date of delivery (or another school district eligible for the same or higher priority consideration if the award is to the private bus company and the contract with the school district ends before the end of the 5-year period).

Date Posted: 8/21/2023

**9.a.16**: May applicants include the Commercial Clean Vehicle Credit (IRC 45W) as leveraged additional external funds if the application period for this credit will be after the 2023 Clean School Bus Grant applications are due?

**Answer:** No. Applicants may claim federal tax credits, such as IRC 45W, for the replacement bus and charging infrastructure funded by 2023 Clean School Bus Grant funds. However, these credits are not considered additional external funds.

**9.a.17**: Is equipment funded under this Notice of Funding Opportunity (NOFO) owned by EPA until the value of the equipment depreciates below a certain threshold?

**Answer:** No. EPA does not hold a lien or the title to the new school buses, or a lien on eligible charging infrastructure equipment. Note, the buses must serve the school district listed on the application for at least five years from the date of delivery, unless the award is to an eligible contractor and the contract with the school district ends before the end of the 5-year period, in which case, those school buses may be operated as part of another school district eligible for the same or higher priority consideration. Upon request, replacement buses must be made available for inspection by EPA or its authorized representatives for five years from the date of delivery.

Date Posted: 8/21/2023

**9.a.18**: Are there requirements for where the charging stations must be installed? Are gravel parking lots allowed?

**Answer:** Each school district will need to make its own decisions regarding the location of its charging infrastructure. For example, charging infrastructure may be installed on school property (see Question 9.a.2) and off-site charging hubs (see Question 9.a.3).

Date Posted: 8/21/2023

9.a.19: Do Davis-Bacon wage rates apply to the construction activities?

Answer: No.

Date Posted: 8/21/2023

**9.a.20**: How do the two sub-programs differ in terms of responsibility for expenses and/or resources not covered by the grant?

**Answer:** Regardless of the sub-program, the applicant organization is the direct recipient of the EPA grant and is ultimately responsible for ensuring that funding is spent in accordance with the terms and conditions of the grant agreement and that the program requirements are met, including reporting and recordkeeping. Responsibility for expenses beyond the grant funding will depend on the contractual agreement between the applicant and its project partners. Please note, EPA is not involved in these contractual arrangements.

Date Posted: 8/21/2023

**9.a.21**: Do school bus vendors need to be registered in order to sell replacement buses to grantees?

**Answer:** No. Manufacturer and vendors may sell replacement buses directly to grantees without registering as a vendor with EPA. Note, the replacement buses must be purchased in compliance with applicable federal, state, Tribal, and local procurement laws.

**9.a.22**: If we receive emission reduction credits as a result of the grant program, would EPA require those credits to be transferred to the EPA?

**Answer:** The EPA will not require any emission reduction credits received through the program to be transferred to the EPA.

Date Posted: 8/21/2023

**9.a.23**: Are school districts listed on a Third-Party application also subject to reporting requirements?

**Answer:** Reporting and recordkeeping is ultimately the responsibility of the applicant organization that is the direct recipient of the EPA grant. However, the recipient may place its own reporting requirements on its partner school district(s).

Date Posted: 12/21/2023

**9.a.24**: Has EPA discussed with Treasury/IRS the importance of flexibility and timeliness of its new elective pay mechanism? Has the agency discussed the IRA tax credits with Treasury/IRS?

**Answer:** EPA is working to collaborate with the Treasury Department (Treasury) on providing clear communication and resources on IRA tax credits, including the elective pay mechanism, for CSB Program participates. EPA cannot provide tax policy guidance to any individual CSB program participant. Participants should direct additional questions and feedback to Treasury; please see the Internal Revenue Service (IRS) website for more information on these credits, including referring to the <a href="IRS Complex Tax Topics webpage">IRS Complex Tax Topics webpage</a>. Additional questions can be directed to one of the helpline numbers below:

IRS Helpline for Tax Paying Entities (private fleets, OEMs, bus dealers, eligible contractors, etc): 800-829-4933

IRS Helpline for Non-Tax Paying Entities (school districts, nonprofit school transportation associations, Tribal applicants, local government entities, etc): 877-829-5500

Date Posted: 12/21/2023

**9.a.25**: If a bus is declared a total loss during the five years it must serve the school district, is there a requirement for replacing the buses that can no longer be used?

**Answer:** If a bus is declared a total loss after a crash or the bus is stolen before the end of the five-year period, then grantees will work with their EPA Project Officer to determine next steps. Per 2 CFR Section 200.313, procedures for managing equipment acquired in whole or in part under a Federal award require that a control system is developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated. Further, Section 200.310 requires the grantee provide, at a minimum, the equivalent insurance coverage for real property and equipment acquired or improved with Federal funds as provided to property owned by the non-Federal entity.

**9.a.26**: Is there a deadline by which the purchase/sales orders for the replacement buses and charging infrastructure must be submitted to vendors?

**Answer:** If the project is selected for funding, then grantees will work with their EPA Project Officer to submit purchase/sales orders within a reasonable timeframe. While there is not a specific deadline to submit purchase/sales orders to vendors, school districts or fleets serving the school district must take the bus(es) title(s) and complete charging infrastructure installation before the end of the project period. EPA currently estimates that the project period of performance for awards will begin around April 1, 2024, and last up to 24 months. However, project periods of up to 36 months will be allowed where justified by the activities, timeline, and milestones detailed in the workplan.

Date Posted: 12/28/2023

**9.a.27**: Are Clean School Bus grants subject to the requirements of the National Environmental Policy Act (NEPA)?

**Answer:** Clean School Bus Grants awarded by EPA are subject to the requirements of the NEPA. NEPA exists to review activities to ensure they do not significantly affect the human environment. In this case, they apply to the installation of electric vehicle supply equipment or EVSE. Installation of the EVSE infrastructure and any other construction to be funded by EPA may trigger a NEPA review. EPA has adopted a Department of Energy categorical exclusion for EV charging equipment. This is the lowest level of NEPA review.

Date Posted: 7/24/2024

**9.a.28**: If we install infrastructure using separate funds, do we still need an EVITP Certified electrician?

**Answer:** No, electricians installing non-CSB Program funded infrastructure do not need to be Electric Vehicle Infrastructure Training Program (EVITP) certified. However, all electricians installing, operating, or maintaining CSB Program-funded infrastructure must have a certification from the Electric Vehicle Infrastructure Training Program or be a graduate or have a continuing education certificate from a registered apprenticeship program for electricians that includes charger-specific training and is developed as part of a national guidelines standard approved by the Department of Labor in consultation with the Department of Transportation. Training to certify licensed electricians to install EVSE, such as certification through the Electric Vehicle Infrastructure Training Program is an eligible project cost under the CSB Program (Please refer to Section III.D.4.G on the CSB NOFO and Q&A 9.a.4 for more details).

Date Posted: 7/24/2024

**9.a.29**: Will EPA review or otherwise engage in contracts between school districts and third-party contractors under the CSB Grant Program?

Answer: No, EPA will not be involved in the contractual agreements between school districts and contractors for busses or other equipment, or bus services or other services, but EPA strongly encourages school districts to carefully review all terms of the contract prior to signing the contract. Grantees and school districts should ensure that they will be able to meet all CSB Program requirements detailed in the 2023 CSB NOFO and related terms and conditions, including requirements for the buses to serve the school district listed on the application for at least five years from the date of delivery, and all procurement requirements as detailed in 2 CFR. If the project is terminated prior to the five years from date of bus(es) delivery, or otherwise fails to adhere to project requirements, then the grantee will be responsible for reimbursing EPA or other remedies.

Date Posted: 7/24/2024

**9.a.30**: Are there programs the EPA recognizes as acceptable training programs for electricians and will the EPA allow exemptions if no Electric Vehicle Infrastructure Training Program (EVITP)-certified electricians are available near the project's location?

**Answer:** Per the Section III.D.2.b.iv. of the <u>NOFO</u>,: All electricians installing, operating, or maintaining EVSE are required to be certified from the EVITP, or another program approved by the EPA in consultation with the Department of Labor and Department of Transportation.

To request approval for an electrician certification program other than EVITP, please email <a href="mailto:cleanschoolbus@epa.gov">cleanschoolbus@epa.gov</a> with "Alternative CSB Electrician Certification Program" as the subject line and include the certification program's name, website, point of contact, and other pertinent details about the program's requirements. Recipients should request and maintain proof of EVITP certification (or other approved certification program) from their electricians for purposes of project audits. Note that EVITP certification is an eligible project cost. Please see Section III.D.4.g. of the NOFO for more details. The EPA may provide an exception to the requirement if grantees can demonstrate there are no electricians meeting the above requirements available in their area, and that efforts to train local electricians to meet the requirements are not feasible.

### **9.a.31**: When can grantees draw down grant funds?

**Answer:** Per <u>EPA General Terms and Conditions</u>, all grant recipients, including for-profit entities, must draw down funds from Automated Standard Application Payments (ASAP) only for the minimum amounts needed for actual and immediate cash requirements to pay employees, contractors, subrecipients or to satisfy other obligations for allowable costs under this assistance agreement. The timing and amounts of the drawdowns must be as close as administratively feasible to actual disbursements of EPA funds. Disbursement within 5 business days of drawdown will comply with this requirement and the recipient agrees to meet this standard when performing the award.

This means that, for the 2023 CSB grant program, recipients must draw down upon receipt of invoices (not purchase orders) for equipment (e.g., buses, charging infrastructure) and other eligible costs. Note that funds can be drawn down for a downpayment/deposit on a bus or other equipment when there is an invoice for the downpayment/deposit and the downpayment/deposit is documented in the contractual agreement between the grantee and vendor.

Date Posted: 9/23/2024

**9.a.32**: How should a third-party grantee (e.g., private bus fleet provider) handle funds paid to them by a school district beneficiary for the use of grant-funded charging equipment or other equipment?

**Answer:** In this scenario, the grantee should follow the rules governing Program Income (refer to <u>2 CFR 200.307</u>, <u>2 CFR 1500.8(b)</u>, Section G of the Terms and Conditions of this grant program, as well as Q&A 9.a.20). For example, if a school district beneficiary pays the third-party grantee any money for the use of grant-funded charging equipment or other equipment\*, then all of that money must be used to finance the non-Federal share of the project or pay for other project needs (e.g., electricity).

If any of the money from the school district beneficiary paid to the third-party related to the use of grant-funded equipment is income or profit for the third-party grantee, then the grantee must report it as Program Income in their bi-annual performance reports (per Section G. of the CSB T&Cs).

In instances where the grantee is using money from the school district beneficiary to pay for other project needs not listed in the grant budget tables (e.g., electricity), then the grantee must have and maintain supporting documentation to substantiate all grant related charges when audited showing that any funds charged to a school district beneficiary for the use of equipment (e.g., charging equipment) were passed in full to a vendor (e.g., utility).

For additional information on Program Income, please refer to <u>2 CFR 200.307</u> Program Income Chapter II and <u>2 CFR 1500.8</u> Program Income Chapter VX, the <u>EPA's Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance</u>, as well as the CSB T&Cs.

\*This only applies to buses purchased with grant funds under the circumstances described in Q&A 9.a.33.

Date Posted: 9/23/2024

**9.a.33**: What documentation is required by a third-party grantee (e.g., private bus fleet provider) related to the use of buses provided with grant funds?

**Answer:** For grantees who are private fleet operators, the fleet operator must retain documentation that the amount they are charging the school district beneficiary for bus services with the grant-funded buses is no more than the amount they are charging for bus service provided with non-grant funded buses. This documentation must be made available upon audit.

If a private fleet charges a school district beneficiary more for bus service provided with grantfunded buses than the amount charged for service with non-grant-funded buses, then they must follow the requirements above regarding Program Income.

Note that for private fleet grantees who use grant-funded buses for bus services for entities other than the school district beneficiary(ies) listed on their grant, then they must also follow the requirements above for Program Income.

Date Posted: 9/23/2024

9.a.34: Where can I access the standard EPA Terms and Conditions?

**Answer:** The <u>EPA General Terms and Conditions</u> are published online and organized by the corresponding EPA assistance agreement date.

Date Posted: 10/28/2024

New 9.a.35: Can Tribes lease buses from the U.S. General Service Administration (GSA) using CSB funds?

**Answer:** No. Under Section III.D.2.a. of the 2023 CSB NOFO, replacement buses must be purchased, not leased or leased-to-own.

Date Posted: 12/6/2024

New **9.a.36**: Can 2023 CSB Grant Program applicants plan to purchase school buses through the U.S. General Service Administration (GSA) Revolving Fund?

**Answer:** If selected for CSB funding, eligible applicants that have the authority to use GSA sources of supply may enter into an agreement with GSA to purchase eligible new buses and infrastructure using awarded grant funds on the applicant's behalf. Through this avenue, the grant selectee would purchase buses and appropriate infrastructure from GSA. Payment for their purchases would be made using CSB-provided grant funding, in combination with other appropriate funding sources available to the applicant. The purchase transactions would be processed through the GSA Revolving Fund. The grant selectee would own the new buses, and any infrastructure, and be responsible for meeting all Terms and Conditions of the grant.

Date Posted: 12/6/2024

### 9.b. Build America, Buy America (BABA)

**9.b.1**: Will these buses be made in America?

**Answer:** There is no requirement that the buses are made in America. We are encouraging all applicants to consider the purchase of domestically-produced buses when possible.

Date Posted: 6/5/2023

**9.b.2**: Are buses and eligible infrastructure funded under the 2023 CSB Grant covered under the Build America, Buy America Act?

Answer: EPA has determined that school buses are not covered by the Build America, Buy America Act (BABA). We are encouraging all applicants to consider the purchase of domestically-produced buses when possible. The EPA is seeking a waiver from BABA requirements for charging infrastructure similar to the waiver recently finalized by the Federal Highway Administration (FHWA)'s National Electric Vehicle Infrastructure (NEVI) Program for electric vehicle chargers. See <a href="https://www.epa.gov/cwsrf/build-america-buy-america-baba-waivers-open-public-comment">https://www.epa.gov/cwsrf/build-america-buy-america-baba-approved-waivers</a>. will be listed at <a href="https://www.epa.gov/cwsrf/build-america-buy-america-baba-approved-waivers">https://www.epa.gov/cwsrf/build-america-buy-america-baba-approved-waivers</a>.

Date Posted: 6/5/2023

**9.b.3**: When does EPA expect to have a decision on the Build America, Buy America (BABA) waiver request for electric vehicle chargers?

**Answer:** EPA does not have an anticipated date for the waiver decision. Approved waivers will be listed at <a href="https://www.epa.gov/cwsrf/build-america-buy-america-baba-approved-waivers">https://www.epa.gov/cwsrf/build-america-buy-america-baba-approved-waivers</a>.

\*\*Date Posted: 7/10/2023

**9.b.4**: Where can I get answers to additional Build America, Buy America (BABA) Act-related questions?

**Answer:** For additional questions related to BABA, please email <u>BABA-OTAQ@epa.gov</u>. *Date Posted:* 10/28/2024

9.b.5: What compliance documentation is required for Build America, Buy America (BABA)?

**Answer:** Grantees must retain manufacturer certifications for items, emails or other documentation from the EPA that support applicability of waivers, and the tracking or items and their cost if using the De Minimis Waiver. Please refer to the Terms and Conditions of your grant, as well as 2 C.F.R. Sections 200.334-200.337 for additional details on retaining grant documentation.

Date Posted: 10/28/2024

**9.b.6**: Does infrastructure purchased with non-EPA funds need to meet Build America, Buy America (BABA) requirements?

Answer: All regulations, policies, and terms and conditions, including BABA, apply to the full amount of the assistance agreement. The assistance agreement includes all funds in the final award document and approved budget table. However, any infrastructure costs that are paid solely with non-federal funding and not included as cost share in any federal grant are not subject to BABA (cost share is defined in 2 CFR 200.306). For those non-federal funds not subject to BABA and included as "other leveraged resources" in the grantee's workplan, the grantee would still need to meet any related leveraged funds terms and conditions of the grant agreement. Regardless, each funding recipient is encouraged to use goods, products, and materials produced in the United States, to the maximum extent, consistent with applicable law as described in 2 CFR 200.322.

9.b.7: Are surface lots covered under Build America, Buy America (BABA)?

**Answer:** As described in Section 70917(c), cement and cementitious materials, or aggregates such as stone, sand, or gravel, or their binding agents or additives are not covered by BABA.

Date Posted: 10/28/2024

### 10. Grant Administration

10.1: How and when will grant funds be distributed?

Answer: Grant funds may be paid in advance of purchases or as reimbursement. The grantee may be paid in advance, provided it maintains or demonstrates the willingness to maintain (1) written procedures that minimize the time between the transfer of funds and disbursement by the grantee, and (2) financial management systems that meet the standards for fund control and accountability as established in 2 CFR Part 200. Advance payments to a grantee must be limited to the minimum amounts needed and be timed to be in accordance with the actual, immediate cash requirements of the grantee in carrying out the purpose of the approved program or project. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the grantee for project costs. Reimbursement is the preferred method when the requirements for advance payments cannot be met or when the grantee requests payment by reimbursement.

Date Posted: 6/22/2023

**10.2**: When do funds awarded through this grant need to be used?

**Answer:** Funds must be used by the end of the project period of performance. EPA currently estimates that the project period of performance for awards will begin around April 1, 2024, and last up to 24 months. However, project periods of up to 36 months will be allowed where justified by the activities, timeline, and milestones detailed in the workplan.

Date Posted: 6/22/2023

**10.3**: When do leveraged funds included in the application need to materialize?

**Answer:** Leveraged funds should materialize during the project period of performance. If the proposed leveraging does not materialize during the project period of performance, EPA may reconsider the legitimacy of the award and/or take other appropriate action authorized under 2 CFR Part 200. EPA currently estimates the project period of performance for awards will begin around April 1, 2024, and last up to 24 months. However, initial project periods of up to 36 months will be allowed where justified by the activities, timeline, and milestones detailed in the workplan.

Date Posted: 6/22/2023

### **10.4**: When is a cooperative agreement provided instead of the grant?

**Answer:** The term "grant" is often used generally to describe assistance agreements. The funding awards for selected projects in the 2023 CSB Grant Program will be in the form of cooperative agreements. Cooperative agreements permit substantial involvement between EPA and the selected applicants in the performance of the work supported. Although EPA will negotiate precise terms and conditions relating to substantial involvement as part of the award process, the anticipated substantial Federal involvement for this project will be in the form of technical assistance, development of outputs, and oversight.

Date Posted: 6/22/2023

**10.5**: If the application is submitted under the Third-Party Sub-Program, will grant funding be dispersed directly to the third-party applicant, or will it be dispersed to the participating school districts?

**Answer:** Under the Third-Party Sub-Program, the applicant organization is the recipient of the EPA funding and is responsible to EPA for the use, management, and reporting on the funding. Funding will be dispersed to the applicant organization according to 2 CFR Part 200.305. The applicant organization has flexibility to pass funding to the school district partners using participant support costs or subgrants.

Date Posted: 6/22/2023

### **10.6**: What are the reporting requirements if awarded a grant?

**Answer:** Quarterly progress reports and a detailed final report will be required. Quarterly reports summarizing technical progress, planned activities for the next quarter and a summary of expenditures are required. The final report must include a summary of the project or activity, advances achieved and costs of the project or activity. In addition, the final report shall discuss the problems, successes, and lessons learned from the project or activity that could help overcome structural, organizational or technical obstacles to implementing a similar project elsewhere. The final report will also include evidence of appropriate disposal of the existing buses, including a signed scrappage statement. For more information on reporting requirements, see Section VI.B of the Notice of Funding Opportunity (NOFO).

Date Posted: 6/22/2023

### **10.7**: What sales transaction documents will EPA require post-award?

**Answer:** By accepting federal funds, recipients are agreeing to comply with the Terms and Conditions of the assistance agreement, including 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Recipients will be provided specific guidance on the frequency and content of required reports. Note, financial records, supporting documents, and all other records pertinent to the award must be retained for a period of three years from the date of submission of the final expenditure report.

Date Posted: 6/22/2023

**10.8**: What supporting documentation will be required to demonstrate eligibility for existing buses?

**Answer:** If selected for funding, applicants must attest to details of the bus to be replaced in a signed eligibility statement, including the title/license number. Neither this statement, nor titles and registrations, need to be submitted with the application.

Date Posted: 6/22/2023

**10.9**: How do Third-Party Sub Program applicants ensure they are following different states' procurement rules when districts served are from multiple states?

**Answer:** Applicants applying as a Third-Party Sub Program on behalf of districts are responsible for following the procurement rules of the associated states in which those districts are located. EPA is not involved in the communication between these parties and does not oversee procurement processes that have been set by each state.

Please refer to EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements at <a href="https://www.epa.gov/grants/best-practice-guide-procuring-services-supplies-and-equipment-under-epa-assistance">https://www.epa.gov/grants/best-practice-guide-procuring-services-supplies-and-equipment-under-epa-assistance</a>.

Any proposed non-competed/sole-source contracts in excess of \$3,500 must include a justification. Note that it is unlikely that EPA will accept proposed sole source contracts for goods and services (e.g., consulting) that are widely available in the commercial market.

Date Posted: 7/14/2023

**10.10**: Will the final invoice or purchase order need to come from the applicant or the Original Equipment Manufacturer (OEM) or dealer of the equipment?

**Answer:** The applicant is responsible for all reporting to EPA and will need to submit the final invoice or purchase order. However, the invoice should be generated by the vendor and EPA may request the documentation on vendor letter head.

Date Posted: 7/14/2023

**10.11**: What is a public-private partnership?

**Answer:** A public-private partnership is an arrangement between a public institution, such as a local government, and a private sector organization.

Date Posted: 7/14/2023

**10.12**: If the Original Equipment Manufacturer (OEM) is a direct applicant, can school districts change their vehicle/infrastructure OEM after being awarded the grant?

Answer: EPA can only provide funds to the direct applicant. The Third-Party Sub-Program assumes that applicants and listed school district beneficiaries have already reached an agreement about the terms of their participation as demonstrated by the third-party approval documentation required as part of the application. If the direct applicant organization is a bus dealer or OEM, a listed school district beneficiary wishing to change OEMs will need to reach an agreement with the direct applicant organization such that either the direct applicant (1) purchases buses for the district from another bus dealer or OEM, or (2) passes funding to the district so that the district may purchase their own buses from another vendor. If the applicant and school district decide not to proceed as partners, the third-party applicant may be required to find a replacement school district beneficiary. Please see Question 2.41 for more details on what happens if one of four school district beneficiaries listed on a third-party application decides not to participate.

Date Posted: 7/20/2023

10.13: How will the 2023 Clean School Bus Grant Program accommodate bus delivery delays?

**Answer:** While the anticipated 24-month project period should be sufficient for most bus deliveries, EPA is aware that supply chain issues have caused delivery delays across a wide range of industries. Grantees can request extensions to the project period deadline. EPA will review these requests on a case-by-case basis and may grant extensions if sufficient justification is provided. For example, EPA may grant an extension if a bus is on order but is experiencing manufacturing or delivery delays.

Date Posted: 8/17/2023

**10.14**: How and when can selectees request advance payment of grant funds?

Answer: As required by 2 CFR 200.305(b), the recipient must draw funds only for the minimum amounts needed for actual and immediate cash requirements to pay employees, contractors, subrecipients or to satisfy other obligations for allowable costs under this assistance agreement. The timing and amounts of the drawdowns must be as close as administratively feasible to actual disbursements of EPA funds. Disbursement within 5 business days of drawdown will comply with this requirement and the recipient agrees to meet this standard when performing this award. Recipients may not retain more than 5% of the amount drawn down, or \$1,000 whichever is less, 5 business days after drawdown to materially comply with the standard. Any EPA funds that remain undisbursed after 5 business days must be fully disbursed within 15 business days of draw down or be returned to EPA. EPA General Terms and Conditions for cooperative agreements can be found here: <a href="https://www.epa.gov/grants/grant-terms-and-conditions">https://www.epa.gov/grants/grant-terms-and-conditions</a>.

Date Posted: 8/17/2023

**10.15**: Can EPA provide a list of the financial management systems that meet the standards for fund control and accountability as established in 2 CFR Part 200?

**Answer:** EPA's Office of Grants and Debarment offers training and resources to help applicants apply for grant funding at: <a href="https://www.epa.gov/grants">https://www.epa.gov/grants</a>. See, for example, the Office of Grants and Debarment's webinar on Financial Management at <a href="https://www.epa.gov/grants/epa-grants-webinars">https://www.epa.gov/grants/epa-grants-webinars</a>.

**10.16**: If the applicant is issuing Participant Support Costs, does the written agreement need to be in place at the time of the application?

Answer: No.

Date Posted: 8/21/2023

**10.17**: What are the different reporting requirements between a beneficiary receiving a subaward and Participant Support Costs (PSC)?

**Answer:** Successful applicants will be required to submit quarterly progress reports and a detailed final report. Within those reports, budgeting, tracking, and reporting of costs will differ for PSC payments and subawards. Recipients of EPA awards should include costs for direct PSC payments in a separate line item in the "Other" budget object class category on form SF-424A and in the budget table in Section 10a, Budget Detail, of the Project Narrative. Costs for subawards should be in a separate "Subaward" line item in the "Other" budget object class category of the SF-424A and in the budget table in Section 10.a Budget Detail of the Project Narrative.

Date Posted: 8/21/2023

**10.18**: After receiving notification of selection, when can school districts begin issuing their purchase orders for new buses?

**Answer:** In most cases, purchases may not be made until after an official award is made. The official award will be made by the Regional EPA Award Official. Applicants are cautioned that only a grants officer is authorized to bind the Government to the expenditure of funds; selection does not guarantee an award will be made. For example, statutory authorization, funding, or other issues discovered during the award process may affect the ability of the EPA to make an award to an applicant. The award notice, signed by an EPA grants officer, is the authorizing document and will be provided through electronic or postal mail. The successful applicant may need to prepare and submit additional documents and forms (e.g., a work plan), which must be approved by the EPA, before the grant can officially be awarded. The time between notification of selection and award of a grant can take up to 90 days or longer. In some cases, selected applicants may be approved for pre-award costs, as described in <u>2 CFR 1500.9</u>. Selected applicants should contact their Regional project officer to discuss timelines and next steps.

Date Posted: 5/10/2024

10.19: Will our Project Officer be able to provide in writing that pre-award costs are approved?

**Answer:** Selectees must contact their Project Officer before spending any funds. The Project Officer may then provide written approval for pre-award costs where appropriate.

Date Posted: 7/24/2024

**10.20**: How do we contact our Project Officer?

**Answer:** Please email <u>cleanschoolbus@epa.gov</u> if you do not have contact information for your Project Officer.

Date Posted: 7/24/2024

**10.21**: What types of unallowable costs should grant recipients who are for-profit entities be aware of?

**Answer:** The CSB Notice of Funding Opportunity (NOFO) details eligible costs, with additional information available in the CSB Terms and Conditions (T&Cs) as well as the EPA General Grants T&Cs and Cost Principles in 2 CFR Part 200, Subpart F.

It is particularly important that for-profit recipients be aware of the EPA General Grants T&Cs on Management Fees. As described in that T&C, management fees or similar charges in excess of the direct costs and approved indirect rates, are not allowable costs under the assistance agreement. This precludes for-profit recipients (and any other recipient) from earning a "profit" on grant funds through, for example, mark-ups on bus prices that exceed their costs for acquiring and preparing the bus for delivery to a school district. For an example on how to calculate allowable direct and indirect costs and provide necessary detail for eligible costs in the budget table, please review the <u>9/17/24 EPA Webinar presentation</u> (refer to slide 15).

Date Posted: 10/28/2024

#### **10.22**: What is the de minimis indirect cost rate?

**Answer:** Any non-Federal entity that does not have a current negotiated rate, except for those non-Federal entities described in 2 CFR Appendix VII to Part 200, paragraph D.1.b, may elect to charge a de minimis rate. The de minimis rate for grants awarded prior to October 1, 2024, is 10% of modified total direct costs (MTDC); for grants awarded on or after October 1, 2024, the de minimis indirect cost rate is up to 15% of modified total direct costs. Any grant that was awarded prior to October 1, 2024, would need to be amended to use the 15% de minimis rate; the amended award would also incorporate all the changes to 2 CFR Part 200 that are effective October 1, 2024. Recipients cannot retroactively apply the de minimis rate to costs incurred prior to the effective date of the amendment.

Date Posted: 10/28/2024

#### **10.23**: Is the de minimis indirect cost rate negotiable?

**Answer:** The de minimis rate is authorized by <u>2 CFR Part 200.414(f)</u> and does not require approval. No documentation is required to justify usage of the applicable de minimis indirect cost rates. As described in Q&A 10.21, the EPA General Terms and Conditions applicable at the time of award determine the de minimis indirect cost rate in accordance with 2 CFR Part 200 requirements.

If a recipient wants to negotiate an indirect cost rate instead of using the de minimis rate, they will have to submit an indirect cost rate proposal to their cognizant Federal agency for approval as described in Q&A 10.23.

**10.24**: How does a recipient negotiate an indirect cost rate?

Answer: Recipients that want to negotiate an indirect cost rate will need to submit an indirect cost rate proposal to their cognizant Federal agency for approval. The cognizant Federal agency is the agency that provides the most direct Federal funding to your organization and is responsible for negotiating your indirect cost rate on behalf of the entire Federal government. If EPA is your cognizant agency, you will email your proposal to <a href="Missingle-OMS-OGD-IndirectCost@epa.gov">OMS-OGD-IndirectCost@epa.gov</a>. The Department of Interior, Interior Business Center has sample proposals, templates and FAQs available to assist recipients in their indirect cost proposals at <a href="https://ibc.doi.gov/ICS/indirect-cost">https://ibc.doi.gov/ICS/indirect-cost</a>.

Date Posted: 10/28/2024

**10.25**: For a bus dealer grantee with a budget with only allowable costs and no indirect costs included, does the grantee need to break down the equipment (or bus) costs based on original equipment manufacturer (OEM) costs as well as every activity performed on the buses (e.g., ADA accessibility, decals, shipping costs, etc.)? Or can the grantee just state equipment costs and have the proper invoices on file to document all costs incurred?

**Answer:** It depends. Please refer to guidance on <u>EPA's Interim General Budget Development</u> Guidance for Applicants and Recipients of EPA Financial Assistance.

As explained on page 19, the combined costs [for making equipment usable for its intended use] should be categorized as equipment for budgeting, inventory and disposition purposes. These determinations require case by case judgments based on the intended use of the equipment and whether the attachments, accessories, or auxiliary apparatus are components of the asset rather than intended as stand-alone devices. The timing of the purchases is also important.

Note that the definition of Acquisition cost provides that "[A]ncillary charges, such as taxes, duty, protective in transit insurance, freight, and installation may be included in or excluded from the acquisition cost in accordance with the non-Federal entity's regular accounting practices."

If a recipient's regular accounting practice is to include transportation and installation costs in the calculation of acquisition costs for vehicles sold to a school system, and there are invoices documenting the transportation and installation charges, all eligible costs can be budgeted as equipment. However, the entire cost for the equipment is excluded from Modified Total Direct Costs for the purposes of applying the recipient's indirect cost rate as provided in the definition of that term in 2 CFR 200.1. In addition, recipients must ensure that no management fees or profits are included in the vehicle cost (please refer to Q&A 10.21 for additional details).

Recipients whose regular accounting practice is to exclude transportation and installation costs from acquisition costs for vehicles must follow that practice when budgeting for equipment costs. For example, if the recipient does not include personnel costs for transportation, installing decals, acquiring supplies, and other items necessary to make the vehicle usable for the intended use in the calculation of acquisition costs then those costs are to be budgeted in the personnel/fringe, supplies, contractual line items. Recipients may recover their indirect costs for personnel, fringe, supplies, travel and contractual services under the definition of Modified total direct costs. Refer to slide 15 of the 9/17/24 EPA Webinar presentation for an example.

**10.26**: Are for-profit companies required to request multiple bus quotes from original equipment manufacturers (OEMs)?

**Answer:** As described in the <u>Best Practice Guide for Procuring Services, Supplies, and Equipment under EPA Assistance Agreements</u> recipients (including for-profits) must obtain equipment competitively with the method of the competition depending on the total purchase price for the transaction. For example, if the total purchase for five vehicles exceeds \$250,000, then the recipient must comply with the formal competitive requirements of <u>2 CFR 200.319</u> and <u>2 CFR 200.320(b)</u>.

Based on the CSB Statute, the EPA has determined that for CSB grants, bus dealers who have an exclusive relationship with a bus manufacturer may purchase buses from that manufacturer without going through an open competition. Bus dealers must provide appropriate documentation of the exclusive relationship with a bus manufacturer and should consult with their EPA Project Officer for details.

Date Posted: 10/28/2024

**10.27**: Can the EPA establish a working group or equivalent for awardees to meet and share best practices?

Answer: The EPA has several existing resources to support grantees, including the Environmental Justice Thriving Communities Technical Assistance Centers (EJTCTACs) webpage and the Office of Grants and Debarment (OGD) grantee resources webpage. While we do not currently have working groups for awardees, awardees can reach out to their EPA Project Officer to inquire about regional meetings related to CSB grants that may offer an opportunity for questions and sharing best practices.

Date Posted: 10/28/2024

**10.28**: Are sole source contracts allowed for microgrid development where there is an existing relationship independent of the award?

**Answer:** It depends on how the relationship was established. If a recipient conducted a competition that meets the requirements in the Procurement Standards in 2 CFR Part 200 prior to receiving the award of EPA funding, the recipient may use EPA funds to acquire goods and services from the contractor provided the scope of the contract covers that purchase. Otherwise, the existing relationship is not determinative of whether a proposed transaction meets the requirements for a sole source contract in 2 CFR 200.320(c). The EPA rarely approves sole source contracts as indicated in the Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements. Please contact your EPA Project Officer if you have additional questions on sole source awards.

Date Posted: 10/28/2024

**10.29**: Do the negotiated rates for nonprofits apply to non-profit sub-awardees?

**Answer:** Pass-through entities must accept a nonprofit subrecipient's approved indirect cost rate agreement negotiated between the nonprofit subrecipient and their Federal cognizant agency. Non-profit sub-awardees without a federally-approved indirect cost rate are eligible to use the de minimis rate. More information on the indirect cost de minimis rate can be found at here.

**10.30**: What happens if material shortages or other situations outside a grantee's control cause buses to arrive late, after the obligation period?

**Answer:** Please keep your EPA Project Officer up to date on your progress and any hurdles you may be encountering. As stated in the 2023 CSB NOFO, the project period is up to 24 months; however, where necessary, the EPA can grant an extension of the project period of up to 12 months. CSB Program participants can also receive free technical assistance from the Joint Office of Energy and Transportation (JOET) for help with planning for, purchasing, and deploying clean buses and supporting infrastructure. For JOET technical assistance, please email cleanschoolbusTA@nrel.gov.

Date Posted: 10/28/2024

### **10.31**: Who can I contact if I have additional financial questions?

**Answer:** For general questions related to grants financial management, please email <u>cleanschoolbus@epa.gov</u>. For more specific financial questions related to your grant project, please contact your EPA Project Officer.

Date Posted: 10/28/2024

### **10.32**: Can a grantee request funds to repay bus order deposits that are made?

**Answer:** If a deposit for a bus or other equipment is part of a written contract and/or the grantee has an invoice for the deposit, then yes, the grantee may draw down the amount for the deposit using the Automated Standard Application for Payments (ASAP). Grantees must retain the written contract and/or invoice for the deposit with their grant records in accordance with 2 CFR Sections 200.334-200.337.

Date Posted: 10/28/2024

#### **10.33**: How does a grantee reimburse the EPA?

**Answer:** Recipients can return funds back to the EPA in three ways:

- 1. Through the Automated Standard Application for Payments (ASAP) utilizing the Return ACH debit feature;
- 2. Using Fedwire (fees may apply);
- 3. Using Pay.gov.

The quickest and easiest method for returning funds is the Return ACH debit in ASAP. If you have any questions about returning funds, please contact <a href="mailto:rtpfc-grants@epa.gov">rtpfc-grants@epa.gov</a> and your EPA CSB PO for assistance identifying your regional financial specialist.

**10.34**: Does a portion of CSB funds have to be used for infrastructure?

**Answer:** Under the 2023 CSB Grant Program, grant funds may be used on eligible school bus and EV charging infrastructure; however, recipients have flexibility to determine the split between funding for the bus itself and the supporting infrastructure. As stated in the Notice of Funding Opportunity (NOFO) and the award Terms and Conditions (T&Cs), new buses must continue to serve the school district listed on the application for at least five years from delivery, and thus awardees must ensure they can appropriately charge the new buses regardless of whether or not they choose to use EPA funds for charging infrastructure.

Date Posted: 10/28/2024

**10.35**: What are 'formal competitive requirements'? Is there a list of requirements other than price?

Answer: Formal competitive requirements are found at 2 CFR 200.319 and 2 CFR 200.320(b) and include two types of formal procurements: sealed bids and competitive proposals. Sealed bidding is appropriate when precise specifications can be developed and a firm fixed-priced contract will be awarded to the responsive bidder based principally on price. Procurement by competitive proposals is appropriate when conditions for sealed bidding are not met and the recipient will award either a firm fixed-price or cost-reimbursement contract. For more information, refer to page 12 of the Best Practice Guide for Procuring Services, Supplies, and Equipment under EPA Assistance Agreements. Note that recipients must follow their own procedures for advertising contracting opportunities as well as the Good Faith Efforts to procure from Disadvantaged Business Enterprises (DBEs) in 40 CFR Part 33. This includes, whenever practical, posting requests for bids or proposals for at least 30 days on a publicly available website along with outreach efforts to encourage participation by DBEs.

Date Posted: 10/28/2024

**10.36**: How does the process of negotiating an indirect cost rate differ for for-profits compared to non-profits?

**Answer:** Nonprofit and commercial entities have similar Indirect Cost Rate Proposal requirements. The Department of the Interior's (DOI) Interior Business Center (IBC) will negotiate indirect cost rates on behalf of the EPA with both entity types. For-profits are subject to 2 CFR Part 200, subparts A through D as well as the Federal Acquisition Regulation (FAR) Part 31.

Date Posted: 10/28/2024

**10.37**: If a grantee's CSB award went out but they never agreed to the Terms and Conditions of the award, or drew down any funds, are they still able to negotiate an indirect cost rate?

**Answer:** Only applicants with an active EPA award can request to negotiate an indirect cost rate with the EPA. Please contact your EPA Project Officer for more information.

**10.38**: As long as a school district acquires buses and electrical contractor services in the ordinary course (e.g., by using a purchasing cooperative), then would that be considered to be compliant competitive purchasing?

**Answer:** It depends on whether the "ordinary course" includes competition. Under <u>2 CFR 200.318(e)</u>, the EPA encourages recipients to use "common services" competitive procurements in order to achieve efficiencies and better pricing. For example, purchasing cooperatives that meet the pre-qualified lists of sources for buses and electrical services at <u>2 CFR 200.319(e)</u> are acceptable to the EPA. Depending on state law, school districts may be able to take advantage of state contracts for these services as well.

Date Posted: 10/28/2024

**10.39**: What should a grantee do if their engine label and/or vehicle identification number (VIN) tag is no longer visible/legible on the engine itself, but the grantee can provide documentation (e.g., vehicle Title) that separately documents the identifying information?

**Answer:** If the VIN or other identifying information does not appear on the engine or it is difficult to read, then the grantee should contact the engine manufacturer for assistance with determining engine identification information including the VIN and engine family name. Some manufacturers also have online tools where their customers can enter engine serial numbers and determine the engine family name.

If the manufacturer is unable to provide identifying information, then the grantee should include the documentation with identifying information (e.g., vehicle Title and registration) in the photo of the engine before and after scrappage; importantly the identifying information must include the VIN along with clear evidence that the engine and VIN are appropriately linked (i.e., VIN documentation is clearly associated with that unique engine).

Date Posted: 10/28/2024

**10.40**: What type of documentation do grantees need to provide to document the purchase of their new buses and any infrastructure?

**Answer:** If grantees need to provide a downpayment or deposit on the new bus(es) and/or infrastructure to their vendor(s), then they should have an initial invoice showing the amount of the downpayment/deposit that they retain with their grant records in accordance with 2 CFR Sections 200.334-200.337. Once the bus(es) and any infrastructure are received, grantees must retain the final invoices for their records. Both the initial and final invoices must be made available upon audit and should match the breakdown of costs reflected in their project budget table.