

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

August 8th, 2025

This is a supplement to the [Questions and Answers](#) document published by the EPA on December 30th, 2024, and contains new guidance for the benefit of **2023 Clean School Bus Rebate Program** participants. The sections listed in this document reference the sections in the Program Guide. The Program Guide and other rebate information can be found [here](#).

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Please note that many questions are variations of each other so your exact question may not be listed; please look for similar questions. If your question is not answered after reviewing this document, please email it to cleanschoolbus@epa.gov with “2023 CSB Rebate Question” in the subject line.

1. Overview

1.31: *Why would a CSB rebate designated from federal funds not have a CFDA number?*

Answer: CSB rebate funds do not have a Catalog of Federal Domestic Assistance (CFDA) number because they are not Federal Financial Assistance as defined in 2 C.F.R. Part 200. Note that CFDA numbers are now referred to as Assistance Listing Numbers, ALN; more information on ALN is available here: <https://sam.gov/assistance-listings>.

Date Posted: May 5th, 2025

1.32: *Do Justice40 (J40) requirements apply this program?*

Answer: No, J40 requirements no longer apply to this program.

Date Posted: May 5th, 2025

3. Eligible School Buses and Infrastructure

Revised 3.34: Does all infrastructure purchased with CSB funding need to meet Build America, Buy America (BABA) requirements? Do BABA requirements apply to infrastructure purchased with non-EPA funds?

Answer: Yes. All fueling infrastructure, including electric charging infrastructure, battery energy storage systems (BESS), and renewable on-site power generation systems purchased with CSB funds must fully comply with BABA requirements, unless the EPA grants a waiver.

Any infrastructure costs that are paid solely with non-federal funding but are part of a project that receives federal funding are also subject to BABA requirements. It is important to consider EPA's definition of a project when determining which infrastructure activities are subject to BABA. The EPA defines a "project" generally to mean an activity at the same time, same place, and with the same purpose regardless of the funding source.

Please see Question 2.13 in OTAQ's [BABA Implementation Procedures](#) for examples of the purpose, place, and time test as they apply to charging/fueling infrastructure.

The EPA recognizes that this guidance updates previous guidance for this 2023 CSB Rebate Program (published on 9/28/23) on the applicability of BABA requirements to infrastructure costs paid for solely with non-Federal funding. To the extent that 2023 CSB rebate recipients have not, as of the date of this FAQ publication, initiated the purchasing process (e.g., have documentable evidence of previously issuing a Request for Proposal for design, installation, and/or delivery of infrastructure, or previously executing a contract for design, delivery, or installation of infrastructure), then rebate recipients should proceed with purchasing infrastructure in accordance with this updated guidance.

For information on BABA requirements and waivers, visit the EPA's BABA website. A CSB rebate recipient may discuss the potential need for a waiver by e-mailing questions to BABA-OTAQ@epa.gov.

Date Posted: August 8th, 2025

3.64: *When should new school buses be operational?*

Answer: New buses purchased under the 2023 Rebate Program need to be in regular operation by the time the Close Out Form is submitted. If necessary, EPA may grant extension for Close Out Form submission. If new school buses are not expected to be operational by the Close Out Form deadline, selectees will be asked to provide a clear justification for the deadline extension request. EPA will review these requests on a case-by-case basis.

Date Posted: May 5th, 2025

4. Funding Amounts and Number of Applications

4.37: *Can Tribes lease buses from the U.S. General Service Administration (GSA) using CSB funds?*

Answer: No. Under Section 3 of the [2023 CSB Rebates Program Guide](#), replacement buses must be purchased, not leased or leased-to-own.

Date Posted: May 5th, 2025

4.38: *Can 2023 CSB Rebate 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 rebate funds on the applicant's behalf. Through this avenue, the rebate selectee would purchase buses and appropriate infrastructure from GSA. Payment for their purchases would be made using CSB-provided rebate funding, in combination with other appropriate funding sources available to the applicant. The purchase transactions would be processed through the GSA Revolving Fund. The rebate selectee would own the new buses, and any infrastructure, and be responsible for meeting all Terms and Conditions of the rebate. •

- Linked here is the GSA website that contains information regarding eligibility to use GSA sources of supply. (<https://www.gsa.gov/policy-regulations/policy/acquisition-policy/eligibility-determinations>).
- Linked here is a GSA website that provides information for Tribal entities to learn more about how to use GSA programs. (<https://www.gsa.gov/resources/native-american-affairs>).

Date Posted: May 5th, 2025

8. Payment Request Form, Purchase Order, and Payment

8.17: *If an applicant applies only for funding to replace school buses, how should they fill out the infrastructure section of the payment request form?*

Answer: If an applicant did not apply for funding to purchase charging infrastructure, they should input a zero into the areas of the Payment Request Form that ask for information related to infrastructure.

Date Posted: May 5th, 2025

8.18: *Does EPA have a list of certified vehicle family names?*

Answer: Please visit the EPA's Annual Certification Data for Vehicles, Engines, and Equipment webpage for the most up-to-date data on school bus certification:

<https://www.epa.gov/compliance-and-fuel-economy-data/annual-certification-data-vehicles-engines-and-equipment>. The "Heavy-Duty Vehicle Certification Data" spreadsheet includes the vehicle family name of certified vehicles, which the CSB Program requests in the Payment Request Form and Close Out Form.

Date Posted: May 5th, 2025

8.19: *What EPA Vehicle Family Name should we enter in the Payment Request Form for new buses if the certification data is not yet available for that vehicle's model/year?*

Answer: EPA is aware that buses in production or a future year model (2025 & beyond) may not yet be listed in the EPA registry or on a CARB Executive Order. If the Vehicle Family name is not listed, but the same bus model is listed for 2024, then please reference the same 2024 bus model EPA Vehicle Family name (or latest available bus model year that has an EPA Vehicle Family name available). However, please update the first digit of the family name to reflect the expected 2025 or 2026 model year, as applicable. Please see more information about how the model year affects EPA Vehicle Family naming conventions here:

<https://www.epa.gov/ve-certification/information-about-family-naming-conventions-vehicles-and-engines>.

Date Posted: May 5th, 2025

Appendix A. Terms and Conditions

A.40: *If a third-party owns the buses but is not awarded another contract from the district after five years, who would then own and operate the buses?*

Answer: The CSB rebate selectee is responsible for ensuring that all program terms and conditions in the 2023 CSB Rebate Program Guide are met, including that new buses serve the school district on the application for five years from delivery. After the conclusion of five years from the date of new bus delivery, the terms of the contractual agreement between the third-party and the school district would determine ownership of the buses at the end of the contract. EPA will not be involved in contractual agreements between school districts and their fleet providers.

Date Posted: May 5th, 2025

A.41: *Do selectees need to email the EPA whenever funds are spent on eligible expenses or whenever rebate funds are passed to a third-party to complete a purchase for eligible expenses within 10 calendar days or 10 business days?*

Answer: The 10-day timeframe refers to 10 business days after eligible expenses are paid or funds are passed to the third-party for purchases.

Date Posted: May 5th, 2025

A.42: *Do all selectees need to email EPA-CSB-FinancialReporting@epa.gov within 10 days of spending their funds on eligible expenses or passing the rebate funds to a third party to complete the purchase for eligible expenses? Or is this only required for selectees being audited?*

Answer: All selectees must notify EPA of spending rebate funds or passing funds to a third-party within 10 business days.

Date Posted: May 5th, 2025