United States Environmental Protection Agency

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

Thursday, September 17, 2026

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: 5/5/2025

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

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

Date Posted: 5/5/2025

2. Eligible Applicants

No new questions.

3. Eligible School Buses and Infrastructure

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 Updated: 8/8/2025; Originally Posted: 9/28/2023

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: 5/5/2025

3.65: *Can model year (MY) 2011 or newer buses that are currently being leased be returned to the lessor during or after their lease expires to satisfy the sell or donate requirements for buses being replaced through the CSB Rebate Program?*

Answer: A bus can be returned to a lessor during or after its lease period to satisfy the sell or donate requirements for MY2011 or newer buses in the 2023 CSB Rebate Program. Per the 2023 CSB Rebate Program Guide (Program Guide), the selectee must ensure that they have no MY2010 or older buses to scrap prior to returning MY2011 or newer buses to a lessor. Further, the rebate recipient must comply with Section 10 of the CSB Rebates Program Guide, which requires submitting the Close Out Form within two years of selection. Therefore, to accurately document a sale or donation in the Close Out Form, the leased buses must be returned to the lessor within two years of selection, or prior to submitting the Close Out Form if the EPA approves a selectee’s request for an extension on their Close Out Form submission deadline.

As stated in Q&A 3.13, existing buses must still meet all the eligibility requirements listed in the Program Guide. Selectees must ensure the existing buses are replaced according to the Program Guide; this includes either scrapping the existing buses or selling or donating the existing buses based on the requirements listed in the Program Guide.

Date Posted: 3/4/2026

3.66: *Will the EPA allow funding for portable charging infrastructure under the 2023 CSB Rebate Program?*

Answer: Under the 2023 CSB Rebate Program, the EPA may fund portable charging infrastructure if the charging infrastructure meets program requirements and does not generate onsite emissions.

In instances where the portable charging infrastructure needs to be connected to an emergency back-up power source mandated by safety regulations and the back-up power source generates emissions, then the recipient must maintain documentation demonstrating that the back-up power source is necessary to meet safety regulations, as well as documentation showing that it is only used as a back-up power source. The EPA will be conducting audits to review documentation per the terms and conditions of each award. Per the award terms and conditions, failure to fully comply with the program requirements, such as a lack of required documentation, may result in the EPA taking appropriate action up to and including cancelation of an award.

Selectees with further questions about the potential use of portable charging infrastructure in their project should contact the CSB Helpline at cleanschoolbus@epa.gov for assistance.

Date Posted: 3/4/2026

3.67: *What type of charging infrastructure is suitable for charging an electric school bus?*

Answer: Level 2 and direct current (DC) Fast Chargers are both suitable for charging an electric school bus. Level 1 chargers, or those using standard 120-volt outlets, are not recommended for charging an electric school bus. To determine whether a Level 2 or DC Fast Charger is the best fit for your fleet, please reach out to CleanSchoolBusTA@nlr.gov for free technical assistance.

Date Posted: 6/2/2026

New **3.68**: *Will the EPA fund charging infrastructure that is powered by fuel-burning non-road or stationary generator(s) under the 2023 Clean School Bus Rebate Program?*

Answer: For the 2023 CSB Rebate Program, the EPA will not fund charging infrastructure powered by fuel-burning non-road or stationary generators. Please see the 2023 CSB Rebate Program Guide for eligibility requirements for charging infrastructure; additional information on charging infrastructure is included in the 2023 CSB Rebates Q&A document (e.g., Q&A 4.5).

Date Posted: 9/17/2026

4. Funding Amounts and Number of Applications

4.16: *The EPA is clear that "EPA funds must not be used for any infrastructure costs associated with work in front of the electrical meter," but what about utility-owned equipment behind the meter? If a utility installed and owned the school bus's supply infrastructure going from the meter to the charger, and owned the charger itself, could the utility be reimbursed by the school or the EPA for its costs?*

Answer: EPA funding for infrastructure under the 2023 CSB Rebate Program is limited to installations between the electrical meter and the charging port. This can include infrastructure behind the meter that is installed and owned by the utility. If the utility is seeking reimbursement for that infrastructure, they would need to reach an agreement with the rebate applicant to have that applicant pass infrastructure funds on to them. The payment structure reached through agreement between applicant and utility may be a leased agreement. However, the school district listed in the application must retain access to the utility-owned eligible infrastructure for at least five years to comply with the 2023 CSB Rebate Program requirements. The utility may continue to own and maintain the eligible infrastructure throughout the five-year period, but the direct applicant is responsible for adherence to Program requirements. These requirements include but are not limited to: infrastructure eligibility based on 2023 CSB Rebate Program Guide requirements, CSB funds are only used for costs associated with in the first five years of service, all CSB funds must be expended and paid to the vendor prior to Close Out Form submission, and retention of all financial documentation. In addition, please refer to the OTAQ BABA Implementation Procedures guide for details on important requirements for all infrastructure included in the CSB-funded project.

Date Updated: 6/2/2026; Originally Posted: 9/28/2023

4.22: *Can other Federal funds be used for solar energy systems that would then tie in electric vehicle charging by a school bus?*

Answer: Other Federal funds can be used for infrastructure expenses provided that (1) the expenses are purchased and invoiced on separate documentation from expenses paid for with CSB funds: (2) the expenses are not in any way paid for with CSB funds; and (3) the expenses are not eligible under the CSB Program (e.g., a utility side of the meter infrastructure installation).

Further, fleets can use external non-Federal funding sources, such as state or local funds, as part of their bus replacement project, but must confirm with the source of those funds that they are not pass-through Federal funds.

Importantly, please refer to the OTAQ Buy America, Build America (BABA) Implementation Guide for important information on BABA requirements for infrastructure that is part of a CSB funded project.

Date Updated: 3/4/2026; Originally Posted: 9/28/2023

4.24: *Can entities participating in an EPA incentive program also qualify for federal tax credits (e.g., IRC 30C and 45W)?*

Answer: Federal tax credits may be available to certain types of entities participating in an EPA incentive program, and entities should consult with a dedicated tax professional to determine whether they are eligible. **Entities interested in determining their eligibility for relevant tax credits 30C (Alternative Fuel Vehicle Refueling Property Credit) or 45W (Qualified Commercial Clean Vehicle Credit) should take into consideration their revised termination clauses provided towards the end of this Q&A.**

In particular, certain applicable entities, including tax-exempt and government entities, that would generally otherwise be unable to claim federal tax credits because they generally do not owe federal income tax, can benefit from some clean energy tax credits, using elective pay, which treats the amount of the credit as a payment of tax and refunding any resulting overpayment.

The categories of applicable entities eligible for elective pay of tax credits 30C and 45W are:

Eligible for elective pay on 45W:

- tax-exempt organizations *(described in §§ 501-530, other than those described in § 523)*
- states (including DC) and political subdivisions such as local governments
- Indian tribal governments
- Agencies and instrumentalities of state, local, and tribal governments

Eligible for elective pay on 30C:

- tax-exempt organizations *(described in §§ 501-530)*
- states (including DC) and political subdivisions such as local governments
- Indian tribal governments
- Agencies and instrumentalities of state, local and tribal governments
- Alaska Native Corporations
- The Tennessee Valley Authority
- Rural electric co-operatives

Other requirements, such as ownership of the credit property (e.g., eligible vehicle or charger), are required. Special rules limit the application of investment-related tax credits (including, but not limited to, 30C and 45W) for U.S. Territories.

Please review the Internal Revenue Service's (IRS) frequently asked questions document on elective pay for more information. The EPA cannot provide tax advice. If needed, please contact the IRS or a dedicated tax professional to address any tax-related questions, including regarding statutory changes to clean energy tax credits.

As a result of H.R.1, the One Big Beautiful Bill Act, being signed into law on July 4, 2025, (Public Law 119-21), the termination dates of 45W and 30C have been revised to the following:

26 USC 45W(g) – Termination
No credit shall be determined under this section with respect to any vehicle acquired after September 30, 2025.

26 USC 30C(i) – Termination
This section shall not apply to any property placed in service after June 30, 2026.

For further questions on these termination dates, including how they impact an entity's eligibility to claim a tax credit, we urge you to contact a dedicated tax professional to discuss your specific situation.

Please note that this question has no bearing on whether an entity is eligible for an EPA funding program. To determine EPA program eligibility, please refer to the relevant program's eligibility requirements.

Date Updated: 8/29/2025; Originally Posted: 9/28/2023

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: 5/5/2025

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: 5/5/2025

New **4.39**: *What steps does a third-party (i.e., contractor) selectee need to take to switch the school district listed on the rebate award such that CSB-funded buses could serve a different school district, per the 2023 Consolidated Appropriations Act (CAA) allowance added to the CSB statute?*

Answer: To submit a CAA Request, rebate POCs must log into the applicant dashboard and create a Change Request Form. Within the request, please select "Edits Requested." Within the "Edits Requested" field, the rebate POC should specify they are requesting a CAA Substitution, provide the new school district name, and NCES ID. Upon review of the request, the EPA will contact you with any questions and provide instructions to submit any necessary supporting documentation. For additional information on requesting a change in the school district listed on the rebate, per the CSB statutory language, please email the CSB Helpline (cleanschoolbus@epa.gov).

Date Posted: 9/17/2026

New **4.40**: *Can third-party selectees request increases in individual bus funding amounts if a non-prioritized school district is replaced with a prioritized school district during a CAA request?*

Answer: No, the EPA will not award additional funding per-bus. If the EPA approves a request to move school buses to a different school district based on the 2023 CAA language added to the CSB statute, the third-party selectee may purchase the same number of replacement buses (or fewer than) listed in their selection letter using the funding amounts in their Selection Letter (refer to the 2023 Clean School Bus Rebate Program Guide, Table 4, for all per-bus funding amounts). Please refer to Q&A 4.39 for more information on submitting a CAA request.

Date Posted: 9/17/2026

5. Application Process

No new questions.

6. Selection

No new questions.

7. Notification

No new questions.

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: 5/5/2025

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: 5/5/2025

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: 5/5/2025

9. Scrappage, Sale, or Donation of Existing Buses

9.13: *What should a selectee do if all of the required information or documentation for a bus that was scrapped, sold, or donated is not available when completing the 2023 CSB Close Out Form?*

Answer: The selectee should request that the scrapyard or entity that took possession of the bus provide a signed certification letter confirming the Vehicle Identification Number (VIN), make, and model year of the replaced bus. The selectee should then upload the signed certification letter as part of their Close Out Form submission. Appendix D of the 2023 CSB Rebate Program Guide (page 33) contains a sample scrappage certification letter for this situation.

The EPA will review the signed certification letter as part of the Close Out Form review process, and follow-up as needed for additional information or documentation.

Date Posted: 6/2/2026

9.14: *Has the EPA considered other solutions for replacing 2010 or older buses besides scrapping them, such as repurposing or selling?*

Answer: The EPA requires that replaced school buses that are vehicle model year 2010 or older are scrapped to ensure these older buses with limited emission controls are removed from service. Equipment and vehicle components that are not part of the engine or chassis may be salvaged from the bus being replaced (e.g., seats, tires, etc.). The destroyed engine and chassis may be sold for scrap metal, provided that the bus is disposed of in accordance with federal and state requirements for vehicle disposal.

Date Posted: 6/2/2026

10. Close Out Form

10.3: *When is the 2023 CSB Rebate Program Close Out Form (COF) deadline?*

Answer: The 2023 COF is due by May 29, 2026, at 4:00PM ET. All project milestones (e.g., receive replacement buses; install eligible charging infrastructure; scrap, sell, or donate existing buses) must be completed by the time the rebate selectee submits the 2023 COF. Please note that individual project milestones (e.g., new bus delivery) do not have specific due dates as long as they are completed by the time of COF submission.

Date Posted: 3/4/2026

10.4: *If a contractor, dealer, or manufacturer applies on behalf of a school district, who is responsible for submitting the Close Out Form and complying with audit requests?*

Answer: The applicant organization is the direct recipient of the EPA rebate and is responsible for meeting all program requirements. Meeting program requirements includes submitting all required forms and complying with audit requests, as well as maintaining all documentation for review during an audit.

Date Posted: 3/4/2026

10.5: *Will the Close Out Form (COF) be completed through the application portal? When will it be available?*

Answer: COFs and supporting materials must be submitted through the Clean School Bus Rebate Forms website at https://app.epa.gov/csb. The EPA anticipates making the COF available in early Spring 2026.

Date Posted: 3/4/2026

10.6: *Will the EPA notify the selectee if their Close Out Form (COF) has been accepted and approved?*

Answer: Yes, once the EPA has completed review of the COF, the EPA will send an email confirming that the COF is approved. Note that during review, the EPA may contact the selectee with requests for additional information or edits to the COF. Please respond promptly and within the timeframe stated in the email.

Date Posted: 3/4/2026

10.7: *If the school district is the entity performing scrappage of the bus(es) being replaced and plans to auction other parts, what entity should be listed as the scrapyard on the Close Out Form (COF)?*

Answer: COFs need to identify the entity that performed the scrappage of the bus being replaced. In this case, the school district is acting as a scrapyard and needs to be listed as the scrapyard in the COF. School districts acting in this capacity must ensure that all scrappage requirements are met as outlined in Section 9 of the 2023 CSB Rebate Program Guide.

Date Posted: 3/4/2026

10.8: *If the bus to be replaced ("existing bus") changes between the Payment Request Form and the Close Out Form (COF), which bus does the selectee need to provide a title for during the COF process?*

Answer: In this case, the selectee will need to “swap” the bus identified for replacement in their COF. The bus listed in the COF as being replaced must meet all eligibility requirements as provided in Section 3 of [2023 CSB Rebate Program Guide], please note in particular the fuel type and model year requirements for the bus being replaced based on the fuel type of the new bus purchased with CSB funds. Per program guidelines, the selectee must provide the title of the bus(es) listed as replaced in the COF. Documentation in the COF is not required for the bus that was originally listed to be replaced in the Payment Request Form but is no longer included in the COF. See Section 5.1 of the [COF User Guide] for more information on how to swap a bus.

Date Posted: 3/4/2026

10.9: *For the Close Out Form, where do we find information on the electric school bus battery capacity and estimated driving range?*

Answer: The electric school bus battery capacity kilowatt hour (kWh) and estimated driving range (miles) will likely be listed on the spec sheet for the bus. Some manufacturers offer multiple battery pack size options, so if you are unsure, please confirm with your dealer or find documentation in the owner’s manual that indicates the correct battery capacity

Date Posted: 3/4/2026

10.10: *If an additional extension is required to complete the Payment Request Form or Close Out Form, when do selectees need to submit the additional extension request?*

Answer: If an additional extension is required, please submit a Change Request Form through the applicant dashboard seven calendar days before the current extension deadline. The Change Request Form will request a detailed explanation regarding the need for an additional extension. The EPA will conduct a robust review of the extension request and notify selectees if the extension will be granted and for what length of time.

Date Posted: 3/4/2026

10.11: *What should a selectee do if there are project delays, such as a manufacturer’s changes in the new bus delivery date?*

Answer: The project period deadline for the 2023 CSB Rebate Program is May 29, 2026. While this should be sufficient for most bus deliveries and other project milestones (e.g., appropriately disposing of buses being replaced), selectees can request extensions to the project period deadline if necessary. The EPA will conduct a robust review of each extension request and may grant an extension if sufficient justification is provided. The EPA will begin reviewing 2023 CSB Rebate Close Out Form extension requests on May 1, 2026. To be considered, all initial requests for extension must be received by May 15, 2026.

Date Posted: 3/4/2026

10.12: *If a selectee was granted a Payment Request Form Extension, is the selectee automatically granted an extension to submit the Close Out Form (i.e., project period) that is due by May 2026?*

Answer: No. However, selectees can request an extension to submit their Close Out Form if they anticipate that they will not be able to meet the May 2026 deadline. The EPA will review these requests on a case-by-case basis and may grant extensions if sufficient justification is provided.

Date Posted: 3/4/2026

10.13: *What are the documentation requirements to demonstrate Build America Buy America (BABA) compliance?*

Answer: Please refer to Question 4.4 in the OTAQ BABA Implementation Guide for information on documentation requirements. Information on document retention requirements is included in Appendix A of the 2023 CSB Program Guide, Terms and Conditions.

Date Posted: 6/2/2026

10.14: *Will any organizations listed in a Payment Request Form or application need to be entered in the Close Out Form?*

Answer: No. Organizations that were entered and used on the Payment Request Form will automatically populate in the Close Out Form.

Date Posted: 6/2/2026

10.15: *Can multiple invoices be consolidated into a single document?*

Answer: Yes, multiple invoices or other relevant documents can be consolidated into a single PDF.

Date Posted: 6/2/2026

10.16: *Should buses funded by programs other than the 2023 CSB Rebate Program be included in the Close Out Form?*

Answer: Selectees should only include buses funded by the 2023 CSB Rebate Program in the COF.

Date Posted: 6/2/2026

10.17: *Should a selectee take any action if an organization has changed their business name since submitting the PRF?*

Answer: No. The CSB Rebate forms (i.e., Application, Payment Request Form, Close Out Form) have an internal notes section where the EPA reviewers can record relevant information such as business name changes. If business name changes for an applicable entity within a Close Out Form—such as a bus vendor or scrapyard for example—are identified during review, the EPA will contact the POCs associated with the form to verify the most up to date business name is entered in the form at the time of submission.

Date Posted: 6/2/2026

10.18: *Should warranty information for powertrain and batteries be included in the Close Out Form?*

Answer: No, warranty information is not required to submit a Close Out Form. However, the EPA strongly encourages selectees to submit warranty information during the Close Out Process. Warranty information is required to be a part of the selectee's record keeping file, as defined in the 2023 CSB Rebate Program Terms and Conditions.

Date Posted: 6/2/2026

10.19: *What information is required to be displayed on the invoice?*

Answer: The invoice must be formatted and contain the following information:

- Document is on dealer/vendor letterhead
- Document is clearly labeled as 'invoice'
- Document(s) includes:
    - Dealer or place of purchase name, address, business phone number
    - Dollar amount of each vehicle or piece of equipment
    - Short description of each line item (make, model, model year, fuel type, VIN), gross vehicle weight rating (GVWR))
    - Additional costs such as personnel or contract work
    - Signatures of purchaser and seller
    - Date order was placed, date invoice was signed
    - Date of delivery
    - Eligible infrastructure (if needed)
        - Make, model, model year, serial number, quantity
        - Date of service or equipment delivered
        - Vendor information
        - Itemized list of services performed
        - Itemized list of supplies used for installation services

Please reference the Clean School Bus Program Purchasing and Invoice Documentation Guide for more information

Date Posted: 6/2/2026

10.20: *Are photos of new bus Vehicle Emissions Control Information (VECI) labels acceptable for the VIN plate photo requirement?*

Answer: Yes, a photo of the VECI label meets the COF requirement for a photo of the new bus Vehicle Identification Number plate photo.

Date Posted: 6/2/2026

10.21: *What date should be used if the new bus was delivered to an offsite location?*

Answer: Please use the date that is issued on the bill of lading or similar documentation showing delivery. Please refer to the 2023 CSB Rebate Program Guide, Appendix A Terms and Conditions for program requirements, including that the new bus(es) serve the school district listed on the rebate for at least 5-years from the date of delivery.

Date Posted: 6/2/2026

10.22: *Does the Close Out Form require infrastructure information if CSB Rebate funds were not spent on infrastructure?*

Answer: Within the Close Out Form, the "Infrastructure" section on page 7 requires information only for charging infrastructure purchased with CSB rebate funding. Non-CSB funded charging stations do not need to be included. However, the Build America, Buy America Compliance (BABA) section on page 9 includes questions about BABA compliance for non-CSB funded charging infrastructure for which the purchasing process was initiated after August 8, 2025.

Date Posted: 6/2/2026

10.23: *In the "Buses" section on page 6 of the Close Out Form, should the "Number of School Buses in Current Fleet" and the "Number of Electric School Buses in Current Fleet" include buses that are part of this rebate-funded project?*

Answer: Yes, these numbers should reflect the number of school buses in your fleet at the time of rebate close out.

Date Posted: 6/2/2026

New **10.24**: *If the bus vendor paid the bus sales tax at the time of registration, should this be listed in the "Funding" section of the Close Out Form as a non-CSB funding type?*

Answer: Yes, all non-CSB funding that was used to purchase buses or infrastructure that were also funded by CSB must be entered in the "Funding" section.

Specifically, the selectee should include sales tax in the "Total Bus Cost" for each bus line item on page 5 of the Close Out Form. Then, on page 7 the selectee should allocate how much CSB-funding was used for each bus. Next, the selectee should list any non-CSB funds used to complete the project as a single lump sum (e.g., by adding together non-CSB funds used for sales tax with any other non-CSB funds used for other project costs).

Date Posted: 9/17/2026

New **10.25**: *What information should selectees reference when listing the new bus model year in their Close Out Form?*

Answer: Selectees should always reference the VECI label located on the vehicle itself for the new bus model year—usually on/near a door pillar or on the engine compartment sheet metal. Note that the model year on the VECI may differ from the model year listed on the new bus invoice and title. If this is the case, the selectee should upload a photo of the VECI label as an attachment to their Close Out Form and input the model year stated on the VECI. The model year on the VECI is necessary to confirm certification information from the EPA.

Date Posted: 9/17/2026

Appendix A. Terms and Conditions

A.5: *Is there any requirement to buy American charging infrastructure in the 2023 Clean School Bus Rebates?*

Answer: Yes, all of the iron, steel, manufactured products, and construction materials used in an EPA-funded infrastructure project must be produced in the United States. This includes, but is not limited to, the EV charger, all wiring or fixtures to support the charging equipment, breaker panels or subpanel, conduits between storage or renewable on-site generation etc. Note that any infrastructure costs that are paid for solely with non-Federal funding but are part of a project that receives Federal funding are also subject to BABA requirements (see updated Q&A 3.34 for details). For more information on Build America, Buy America applicability and compliance please refer to the Build America, Buy America Act (BABA) Implementation Procedures for EPA Office of Transportation and Air Quality Federal Financial Assistance Programs.

Date Updated: 3/4/2026; Originally Posted: 9/28/2023

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: 5/5/2025

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 on to the third party for purchases.

Date Posted: 5/5/2025

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: 5/5/2025

A.43: *If an award recipient is eligible for elective pay, can the award recipient stack applicable tax credits on top of program funds?*

Answer: While an award recipient may stack applicable tax credits on top of program funds, the award recipient is advised to consult with a dedicated tax professional to determine how the program funds will be characterized for tax purposes, because this can affect whether the entire value of the credit can be claimed.

If the program funds that an applicable entity used to pay for the credit property (e.g. eligible vehicle or charger) are considered a “restricted tax-exempt amount,” then the value of those funds plus the value of the tax credit cannot exceed the paid price of the credit property. Grant funding used to pay for a piece of equipment would generally be considered a restricted tax-exempt amount if the grant was given for the specific purpose of purchasing, constructing, reconstructing, erecting, or otherwise acquiring an investment-related credit property (e.g., credit property described in 30C and 45W).

If the sum of the restricted tax-exempt amount and the federal tax credit exceeds the price of the credit property, then the amount of tax credit allowed will be reduced so that the combined value of the credit and the restricted tax-exempt amount does not exceed the price of the credit property. More information on the 30C and 45W tax credits as well as specific examples can be found on the IRS website. Please see Q&A 41 of the linked IRS document to see an example that illustrates this scenario. The EPA cannot provide tax advice. If needed, please contact the IRS or a dedicated tax professional to address any tax-related questions regarding statutory changes to the clean energy tax credits.

As a result of H.R.1, the One Big Beautiful Bill Act, being signed into law on July 4, 2025, (Public Law 119-21), the termination dates of 45W and 30C have been revised to the following:

26 USC 45W(g) – Termination
No credit shall be determined under this section with respect to any vehicle acquired after September 30, 2025.

26 USC 30C(i) – Termination
This section shall not apply to any property placed in service after June 30, 2026.

For further questions on these termination dates, including how they impact an entity’s eligibility to claim a tax credit, we urge you to contact a dedicated tax professional to discuss your specific situation.

Date Posted: 8/29/2025

A.44: *What are the current requirements for the 2023 CSB Rebate Terms and Conditions regarding EPA signage?*

Answer: The EPA is no longer reviewing compliance with the signage Terms and Conditions.

Date Posted: 3/4/2026

A.45: *May awarded funds be placed in an interest-bearing account and can any interest earned on EPA funds awarded under the 2023 CSB Rebate Program be used towards eligible project costs?*

Answer: No. Unless a selectee does not have access to one, funds should be kept in a noninterest-bearing account. Regardless, selectees should work with their vendors to spend EPA funds on eligible project expenses as expeditiously as possible after receiving funds from the EPA; however, if there is an extended period of time between receiving EPA funds and spending those funds, then selectees must adhere to the following requirements.

Specifically, selectees must:

- Follow proper financial management practices to ensure that EPA funds are only used for eligible expenses and should keep EPA funds separate from other funds the selectee might have for general expenses.
- If any interest is earned on EPA funds, then that interest must be returned to the Federal government, in accordance with instructions to be provided by the EPA. Any interest earned cannot go towards eligible project expenses. If a selectee chooses to withdraw from the program, then they must return all awarded funds and any interest earned on those funds. The process of reimbursing funds, including any interest earned, will be initiated through completing the Close Out Form for the project as part of the withdrawal process. The EPA will provide additional information on the reimbursement process prior to Close Out Form submission.

Date Posted: 3/4/2026

A.46: *Can buses listed for replacement in other EPA funding programs be used in a CSB grant or rebate?*

Answer: No. Buses listed for replacement and scrappage in a CSB grant or rebate program cannot be listed in any other EPA funding programs including the Diesel Emission Reduction Act (DERA) and Clean Heavy-Duty Vehicle (CHDV) programs. Per Section 9 of the 2023 CSB Rebate Program Guide, each new school bus funded by the EPA must replace an existing bus that is scrapped, sold, or donated, based on model year requirements in the 2023 CSB Program Guide (refer to Section 3 of the CSB Rebate Program Guide). The EPA will be conducting reviews to ensure all replacement buses are compliant.

Date Posted: 3/4/2026

A.47: *What documentation should selectees retain to demonstrate compliance with the 2023 CSB Rebate Program requirements for replaced buses that operated during the 2022-2023 school year?*

Answer: Examples of documentation to demonstrate compliance with replaced bus usage requirements include bus logs, telematics data, or maintenance logs showing positive changes in odometer readings. If you have alternative types of documentation that may demonstrate replaced buses meeting the usage requirements for your funding opportunity, then retain the alternative documentation and be prepared to provide an explanation of how the documentation shows the replaced bus(es) meeting the replaced bus usage requirements stated in the 2023 CSB Rebate Program Guide.

Date Posted: 6/2/2026

A.48: *Should selectees be prepared for more than one site visit during the five years when the CSB-funded buses must serve the school district listed on the rebate?*

Answer: After an initial site visit, it is possible that selectees could receive additional audits as deemed necessary by the EPA, the EPA Office of Inspector General (OIG), or other Government Agencies.

Date Posted: 6/2/2026

New **A.49**: *Do Davis-Bacon wage rates apply to charger installation work using funding from the 2023 CSB Rebates?*

Answer: No. Davis-Bacon and Related Acts (DBRA) requirements do not apply to the 2023 CSB Rebate Program.

Date Posted: 9/17/2026

New **A.50**: *What is the process for returning interest earned on 2023 CSB Rebate Program funding to the EPA?*

Answer: Per the 2023 CSB Rebate Program Guide, any interest earned on 2023 CSB Rebate funding must be returned to the U.S. Department of Treasury. Interest earned payments will be submitted through an automated clearing house (ACH) or wire transfer payment and should clearly state: "This Payment is to return all interest earned on the U.S. Environmental Protection Agency's 2023 Clean School Bus Rebate Program for CSB Rebate ID (xxxxxx)." Please refer to Appendix A of the 2023 CSB Rebate Program Guide for more information.

Date Posted: 9/17/2026

New **A.51**: *Can an invoice for buses purchased with CSB-funded include buses not connected to the CSB-funded project?*

Answer: Yes. An invoice can contain information on buses not related to the rebate project if all of the CSB-funded bus information is accurate and complete, and the selectee clearly indicates on the invoice which buses are part of the CSB-funded project and which buses are not included in the CSB-funded project.

As a reminder, selectees should keep EPA funds separate from other funds. Refer to Appendix A.1 of the 2023 CSB Rebate Program Guide for additional information on Financial Management Requirements and Best Practices.

Date Posted: 9/17/2026