



April 6, 2026

EPA Docket Center  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**RE: [Docket No. EPA–HQ–OAR–2025–1806]  
Development of Guidance for Alternative Fuel Vehicles and Fueling Infrastructure Deployment  
Under the Clean School Bus Funding Programs**

Dear Sir or Madam:

National School Transportation Association (NSTA) is pleased to offer comments to the Environmental Protection Agency (EPA) on its Development of Guidance for Alternative Fuel Vehicles and Fueling Infrastructure Deployment Under the Clean School Bus Funding Programs, as published in Volume 91 Number 34, of the Federal Register on February 20, 2026.

**About The National School Transportation Association**

NSTA has been the leading resource for school transportation solutions and the voice for private school bus operators for over 60 years. We are a membership organization for school bus contract operators engaged primarily in transporting students to and from school and school-related activities. Members range from small family businesses to large multi-state operators. Private school bus contractors account for 38 percent of the nation’s pupil transportation services and employ more than 250,000 individuals such as bus drivers, mechanics, maintenance workers, dispatchers, and administrative workers. School transportation represents the largest form of mass transportation in the United States, and daily, approximately 25 million K-12 students are transported by an estimated 480,000 yellow school buses.

**NSTA Supports the Continuation of the Clean School Bus Program (CSB)**

NSTA is pleased to hear that the U.S. Environmental Protection Agency (EPA) is planning a new funding opportunity under the Clean School Bus (CSB) Program. Previously, NSTA has publicly supported the continuation of the CSB Program, as it has already demonstrated meaningful progress with approximately \$2.8 billion awarded to support the deployment of cleaner school bus technologies.<sup>1</sup>

With roughly \$2.2 billion in remaining funds yet to be distributed in Rounds 4 and 5, we ask that the Agency quickly move forward with the CSB Program and continue to ensure these resources are fully and effectively utilized. We respectfully ask the Agency to move forward with this process, so that the remainder of the appropriated CSB Funds can be awarded without delay.

**A. Alternative Fuel School Buses**

Alternative fueled school buses continue to be a high level topic of discussion within the school bus industry over the past several years. During these discussions, NSTA has largely been power source agnostic, understanding that there are many factors that go into the bus deployment decision-making

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<sup>1</sup> “Clean School Bus Program Awards.” EPA, Environmental Protection Agency, [www.epa.gov/cleanschoolbus/clean-school-bus-program-awards](http://www.epa.gov/cleanschoolbus/clean-school-bus-program-awards).

process. We are pleased to see the evolution and technological improvements of all alternative fueled buses, and we expect this robust improvement to continue over time. The CSB Program has been extremely beneficial in the deployment of electric school buses (ESBs), and we expect that aspect of the program will continue to thrive, as we gather more operational experience with ESBs.

Overall, the health and safety benefits of a thriving Clean School Bus Program cannot be overstated, and we voice our appreciation and support to the EPA for its decision to continue this vital program.

### **B. Alternative Fuels**

NSTA recognizes that alternative fuel options may also provide cost-effective emissions reductions, and the continual evolution of electric school buses (ESBs) continues to be evident. We would, however, note that compressed natural gas (CNG) and liquified natural gas (LNG) do not currently present viable options within the school bus space.

We are interested to understand what the Agency proposes with respect to biofuels, as a new addition to the CSB Program power source platform, especially as it relates to the awarding of grant funds, and the Agency's concern about fraud, waste, and abuse. NSTA notes that propane already exists within the confines of the CSB Program, and it appears to be second to ESBs in actual grant awards. We would note that currently there is only one OEM that manufactures propane buses.

In addition to ESBs, propane and biodiesel perhaps present the most favorable alternative fuel options in the current climate. According to the Propane Education and Research Council, propane powered school buses produce up to 96% less toxic emissions than diesel buses, and 35% fewer greenhouse gas emissions than grid-generated electricity.<sup>2</sup> Similarly, biofuels such as biodiesel and renewable diesel currently provide operators with fuel flexibility. As reported by the U.S. Department of Energy, there are currently 1,985 public biodiesel stations across the U.S., and 1,236 public renewable diesel stations.<sup>3</sup>

### **C. Fueling Infrastructure**

We are pleased to see that through the CSB Program, the EPA may fund fueling infrastructure as an eligible expense in supporting school bus projects. This acknowledgement denotes the reality that the alternative fuel ecosystem is vastly different than the diesel bus landscape that preceded it.

Understanding that infrastructure has become a necessary expense in the transition to alternative fueled vehicles, funding these costs becomes a commonsense extension of the program. We would note that previously, EPA did not lend enough support to infrastructure, and we believe its absence in the discussion was an oversight.

NSTA is not in a position to provide information on the availability, pricing, performance, and other considerations of alternative fueling infrastructure systems and components, but we are interested in seeing what information EPA is able to garner in the RFI process.

### **E. Oversight and Fraud Prevention**

NSTA would highlight the role that school bus contractors have played in the successful deployment of CSB Program funds across the country. With respect to the term "for-profit entities," NSTA would like to

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<sup>2</sup> School Buses | Perc, Propane Education & Research Council, [propane.com/propane-products/buses/](http://propane.com/propane-products/buses/)

<sup>3</sup> "Alternative Fueling Station Counts by State." *Alternative Fuels Data Center: Alternative Fueling Station Counts by State*, U.S. Department of Energy, Office of Critical Minerals and Energy Innovation, [afdc.energy.gov/stations/states](http://afdc.energy.gov/stations/states).



further distinguish our role as school bus operators, as perhaps very distinct from other for-profit entities within the context of the CSB Program.

NSTA agrees with the Agency and its commitment to the effective management of CSB funding, which includes providing clear information and tools for funding recipients to promote compliance with grant requirements and conducting oversight to ensure such compliance and to prevent waste, fraud, and abuse of taxpayer dollars.

In its Request for Information, EPA notes:

“The EPA observed that CSB projects where all partners—including school boards, transportation service providers, bus manufacturers and dealers, utilities, and infrastructure providers—are engaged prior to the application were most successful. The EPA highly encourages applicants to consult with potential partners to discuss expectations, costs, and timelines in advance of the application.”

To the extent that funds are not being spent as intended, the entities that are most harmed are school bus operators, who utilize this funding to upgrade their respective school bus fleets, and the students and communities who benefit directly from an upgraded school bus fleet.

Private school bus operators are thankful for the opportunity to garner funds through this program for fleet upgrade, and we have consistently maintained the highest level of fiduciary integrity in the usage of grants. In terms of benchmark requirements and auditing, NSTA members have been highly cooperative with the Agency as it ensures fiduciary responsibility within the program.

Keep in mind that private school bus operators can continue to play a vital role within the program, ensuring that they take delivery of buses before funds are deployed. Working together, private school bus operators and the Environmental Protection Agency can continue to provide a strong partnership in the oversight realm of the Program.

As you may recall, private school bus operators were not allowed direct access to Round 1 CSB funding, pursuant to the provisions of the enabling law. NSTA was the driving force in making its case on Capitol Hill that this restriction was not in the best interests of the program, and subsequently the law was revised to allow school bus contractors to directly access CSB funds.

Please be reminded that when bus operators are the grant awardee, the operator remains unencumbered as they negotiate the best terms for the vehicle, while directing tax dollars towards vehicles (and infrastructure) best suited for their customers.

Additionally, we believe that EPA has already made improvement to the CSB Program through its commitment to a competitive grant program, rather than the loosely defined rebate program, and this decision represents an important change.

NSTA continues to support the release of grant funds in a timely and consistent manner, with appropriate benchmarks being achieved before payment of funds. As such, NSTA believes that private school bus operators provide the best platform for achieving the goals of the program, while including the safeguard of taxpayer funds.

**Summary and Conclusion**

NSTA appreciates the commitment underlying this Request for Information and supports EPA's continued implementation of the CSB Program, including the disbursement of remaining appropriated funds. We are pleased with the opportunity to offer comments on EPA-HQ-OAR-2025-1806, and the organization looks forward to a continued dialogue with the Agency in monitoring the results of the Clean School Bus Program.

If you have any follow-up or questions about the NSTA position on the Clean School Bus Program, or the Agency requires clarification on our written comments, please do not hesitate to contact me via email at [info@yellowbuses.org](mailto:info@yellowbuses.org), or via telephone at 703-684-3200.

Sincerely,



Curt Macysyn  
Executive Director  
National School Transportation Association