

**Sent: Friday, October 14, 2022**

**Subject: IPI: Additional guidance for estimating annual usage for school buses impacted by school closures**

IPI Team:

On August 25, 2022, staff sent an IPI notification regarding the California Air Resources Board's (CARB) approval of additional flexibility of school bus historical usage that air districts could use when determining grants. Given new information about school buses' lack of consistent usage due to pandemic-related school closure(s), and to ensure that estimates accurately reflect usage periods, CARB is providing further clarification.

Where applicable, air districts should meet the requirement of Chapter 4, Section B.5 of the *2017 Carl Moyer Program Guidelines* (Guidelines)<sup>1</sup> to estimate the historical annual usage of on-road vehicles by basing the usage on the minimum of two 12-month periods during the most recent 30 months. (i.e. no usage gaps within each twelve-month period).

In cases where an air district's historical annual usage estimates are impacted with periods of lack of consistent usage due to pandemic-related school closure(s), an air district may choose to consider the minimum annual usage from two periods of 12 consecutive months from the previous 30 months excluding periods of non-usage from pandemic related closures. This includes considering annual usage from the 30 months preceding any non-usage from pandemic-related closures. The following are two examples to illustrate this flexibility:

- Air District receives a project for evaluation in June 2022 and there was a pandemic-related school closure between January 2021 to June 2021. The Air District may consider the first 12-month period of usage from June 2021 to June 2022. The Air District may then consider the second 12-month period of usage from January 2020 to January 2021 or from June 2019 to June 2020 (up to 30 months excluding the pandemic related closure).
- Air District receives a project for evaluation in June 2022 but had pandemic-related closures every 6 months in the last 2 years starting in June 2020. The Air District may consider usage prior for two periods of 12 consecutive months from 30 months prior to the first closure in June 2020.

In order to use either method of flexibility, the school district must submit to its air district documentation substantiating the period of pandemic-related closure(s). Substantiating documentation includes, but is not limited to:

- Form J-13A filled out by the school district and approved by the California Department of Education.

- Memo from the school superintendent indicating periods of closure.
- Local or regional mandates requiring school closures during a specified period of time; and/or
- Any other forms of documentation deemed necessary by the air district for evaluation of applicability.

Air districts must include this documentation in their project files to be made available during CARB's review of State incentive programs. All other Carl Moyer Program requirements apply.

If you have questions regarding this IPI, please contact Kyle Goff at [Kyle.Goff@arb.ca.gov](mailto:Kyle.Goff@arb.ca.gov).

<sup>1</sup> The Carl Moyer Program Guidelines. Volume 1: Program Overview, Program Administration and Project Criteria (2017); Page 4-8.

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