NACTO Policy 2018

Guidelines for the Regulation and Management of Shared Active Transportation

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NACTO

In this guide:

Introduction

Shared Active Transportation

Over the past decade, **Shared Active Transportation** systems have become a common sight on North American public streets and rights-of-way, creating new mobility opportunities and changing the way people move around their cities. To create these systems, cities, local governments, and trusted civic partners (e.g. downtown alliances, community-based development organizations) have typically followed a careful, coordinated process; developing structured public-private partnerships, vetting companies through competitive bidding, and managing and regulating systems through binding contracts, to ensure the best outcomes for the public.

Over the past decade, the long-term public-private-civic/non-profit partnerships developed for, by, and along with bike share systems in the U.S. have helped this new transportation option to thrive. In many places, this coordination between cities, operators, and other community stakeholders has allowed bike share practitioners to grapple with complex issues around access and equity, expanding transportation options for low-income people, and focusing investments in communities with histories of chronic disinvestment.

What is Shared Active Transportation?

Companies rent small, shared-use-specific, vehicles to the public from multiple locations within the right-of-way. To date, these small vehicles include: bikes, e-bikes, scooters, and e-scooters, but other vehicles may be under development. Typically, Shared Active Transportation small vehicles are stored in the public right-of-way.

In the initial (also known as "station-based" or "docked") bike share systems, customers picked and returned bikes at stations placed strategically throughout the right-of-way and adjacent public and private property. In the new (also known as "dockless") systems, stations are eliminated, small vehicles can be picked up or left anywhere absent regulation, and small vehicle rental is facilitated through an app. As the technology advances, most companies are moving toward hybrid options, where systems can be station-based, or dockless, or both depending on need.

- **Shared Active Transportation** – a network or system of small vehicles, placed in the public right-of-way and for rent in short time increments, that provides increased mobility options over short distances in urban areas
- **Small Vehicles** – bikes, scooters, e-bikes, e-scooters, and other small, wheeled vehicles designed specifically for shared- use and deployed by Shared Active Transportation companies

In January 2017, a new breed of Shared Active Transportation companies began operating on North American public streets and rights-of-way. Many of these companies initially launched absent contracts, permits, or business licenses, often completely independent of municipal knowledge, policy making, or existing partnerships and community programs. In response, cities have developed new permitting and licensing structures to manage them and to ensure that public needs stay at the forefront of new mobility advances. These companies and their operations typically differ from the initial systems in three ways:

- They are not selected by the municipality or approved civic partner via a competitive bidding process.
- They are not managed or regulated through a contract or legal partnership agreement.
- To date they exclusively use the "dockless" technology model.

This document provides guidance for cities and public entities as they look to manage and regulate Shared Active Transportation Companies that are not otherwise managed through competitive procurement processes or contracts. It focuses on clearer and more formal management of public-use mobility options that are not created under the auspices of a public entity. The regulatory focus of this document is not based on the technology or the business plan. Rather, as businesses operating on city streets, Shared Active Transportation Companies need to be overseen and regulated by public entities when they are not otherwise managed through existing processes.

The guidance is divided into broad categories: policy areas where cities should be in alignment and places where policy should be decided at a local level. In addition, this guidance provides a state of the practice overview for key issues such as determining allowable fleet sizes, ensuring engagement and equity-focus programming, setting permit fees, and vehicle distribution. This overview is meant to provide an at-a-glance look at how different cities are approaching the same issues, providing cities with the best possible information as they decide how to manage and regulate Shared Active Transportation Companies in their jurisdictions.

As the landscape of Shared Active Transportation is rapidly changing, this document will be reviewed and updated approximately 6 months after release, and updated as needed after that.

The Public Authority

Codified in city charters, state constitutions, and laws across North America, is the fundamental responsibility of cities and public entities to ensure safe passage on public rights-of-way, to protect public health, safety and welfare, and govern commerce in the public right-of-way and on private property. From this responsibility comes government's authority to regulate and manage activity and commerce in the public street, such as Shared Active Transportation companies.

If and why cities choose to allow Shared Active Transportation companies to operate on their streets is a local decision. Some cities may find that allowing Shared Active Transportation companies to operate in their jurisdictions in a managed and orderly fashion meets and supports city goals. Others may equally conclude that, such companies impede or detract from local policy goals and should be limited or banned from operating. In many places, cities have intentionally procured and promoted bike share systems as key tools in larger sustainability and mobility plans, conceiving of bike share as part of a package of services provided to the public. In other places, bike share has been a stand-alone addition to the landscape, largely divorced from municipal mobility planning and policy. Demonstrations or pilots may provide useful information on how Shared Active Transportation can best serve a specific city but only if the city is explicit about what it hopes to test and learn.

As cities look to manage Shared Active Transportation, they need to be clear on where and when company goals align with public benefits and to carefully define the terms of success. In thinking through regulation, incentive-based tools may become increasingly important to ensure that the public benefits. In particular, introducing or expanding Shared Active Transportation options provides cities with opportunities to develop, require, and fund necessary equity and engagement programing that can increase ridership and help meet mobility needs. For example, in St. Louis, companies can only expand past 2,500 bikes if they develop and implement a social equity plan and meet other ridership requirements.

Many of the newer small vehicles in the Shared Active Transportation arena—e-bikes, scooters, e-scooters—exist in a regulatory grey area, regulated in a limited fashion on an individual or recreational level but not envisioned en masse or in an automated rental scenario. For example, rules are inconsistent from city to city on where e-scooters or e-bikes allowed to operate or even how they are defined. This murky equipment landscape further complicates regulation. Part of the success of bike share over the past decade has come from the high quality of bike share bikes which need to meet different and often higher safety standards than bikes developed for personal use because they are intended for shared-use and remain in the public realm at all times (examples of shared-use equipment standards include: always-on front and rear lights that remain illuminated after the bike stops, or fully-enclosed and tamper-proof brake cables).

When and where governments choose to exercise their authority varies from city to city. However, the mechanisms for how and why cities can regulate generally fall into similar categories:

Commerce on the public right-of-way
The small vehicles deployed by Shared Active Transportation Companies are commercial equipment. In most places, business cannot be conducted in the public right-of-way without an appropriate permit. Though cash or credit payments are conducted through an app, the transaction is completed within the right-of-way. Shared Active Transportation rentals should be regulated similarly to other businesses.

Zoning regulations
In places where Shared Active Transportation companies propose to conduct some or all of their business from private property, local zoning may apply. Most zoning codes designate what kinds of businesses are permitted where. There is wide variation in how local zoning codes are promulgated, so using zoning as a mechanism to regulate Shared Active Transportation Companies is a local decision. For example, in at least one community, public bike share is explicitly defined and permitted in the zoning code but private bike share is not. Therefore, renting out bikes is not permitted on private property, because it is not an allowed use under zoning.

Regulating where small vehicles are permitted
Regulations about how small vehicles are parked on public property also falls under the general framework of health and safety. If a municipality permits an operation – whether it be an ice cream stand, outdoor dining, or a parked bike/scooter – it can designate the area where the activity is permitted to be.

Existing Contracts
Municipalities with existing contracts with vendors to run local bikeshare systems may have exclusivity or other provisions which limit the municipalities' ability to permit additional vendors/operators of bikeshare to operate or do business within the municipality. The specific language of the contract dictates how much the municipality has to do to actively discourage these operations and may range from simple notifications to removal of unauthorized bicycles. These contracts may or may not apply to other small vehicles such as scooters, one wheels, e-bikes or others depending on the contract language.

Managing Shared Active Transportation

Policy areas where all cities should be in alignment

All cities and local governments should ensure that their contracts, permits, and licenses address the following core issues in substantively similar ways in order to comprehensively manage and protect the public right-of-way and provide a level playing field for this new and evolving industry.

In this section:

Oversight & Authority
General Provisions
Operations Oversight
Public Communications Oversight
Data Standards
Provision & Access
Quality & Accuracy
Privacy
Small Vehicle Standards for the Shared-Use Context

Oversight & Authority

General Provisions

1. Bike share companies and other mobility service providers are only allowed to operate in the public right-of-way with legal permission (e.g. license, permit, contract) from the City or relevant local government.
2. Cities should reserve the right to limit the number of companies operating (e.g. cap the number of permits or licenses issued, issue exclusive contracts, permits, or licenses).
3. Cities should reserve the right to revoke permits, licenses, or contracts from specific companies (e.g. when a company fails to comply with permit, contract, or license terms, or fails to meet national accreditation standards if applicable).
4. Cities should reserve the right to prohibit specific companies from operating in the public-right-of-way based on conduct or prior conduct (e.g. when a company deploys equipment prior to applying for a permit, license or contract, or fails to comply with permit, contract, or license terms).
   - *Note:* Cities may want to consider accreditation by, or conduct code violations recorded by, national organizations such as NABSA (US/Canada) or BikePlus (UK), in addition to examples and experiences in other North American cities, when issuing permits, licenses, or contracts.
5. Cities should reserve the right to establish operating zones and fine companies for bikes and equipment found outside of those designated areas.
6. Cities should limit the duration of licenses and permits to a fixed time period (e.g. 6-12 months) and require all companies to re-apply for each renewal. Contracts developed as the result of competitive bidding processes may have a longer duration. Companies should be aware that cities may update permits terms over time.
7. Cities should charge fees that accurately reflect the cost of regulating, overseeing, and managing bike share and assess penalties or recoup costs to the city for non-compliance with contract, license, or permit terms. (See State of Practice: Permit Fees Table)
8. Cities should require companies to hold insurance and indemnify the city.

Operations Oversight

1. Cities should require companies to remove small vehicles (e.g. damaged, abandoned, improperly placed etc) within contractually agreed-upon time frames and assess penalties for failure to do so.
2. Cities should require companies to come to agreement with the city on procedures and protocol for:
   - extreme weather (e.g. blizzards, hurricanes, floods)
   - emergencies (e.g. earthquakes, fires, etc)
   - special events (e.g. marathons, events, parades, film shoots, etc)
   - maintenance (e.g. snow and trash removal) for small vehicle parking zones.
3. Cities should require companies to provide 24-7 contact information (name, phone number, and email) of a locally-based manager/operations staff with decision-making power who can respond to city requests, emergencies, and other issues at any time.
4. At the city's request, provide staffing and operations plans.

Public Communications Oversight

1. Require all companies to create and maintain a city-specific website and/or social media platform that explains the terms of service, including user instructions, privacy policies, and all fees, costs, penalties, and unexpected charges, in all languages required by the City.
2. Companies shall place a customer service contact phone number, answered 24 hours a day, 7 days a week, on all small vehicles and other equipment (e.g. signage, racks etc), which connects the public to local management and operations teams.

Data Standards

Companies operating in the public right of way must provide cities and local governments with accurate, complete, and timely data about how Shared Active Transportation services are used and, in an appropriately anonymized fashion, who is riding.

Data Provision & Access
Format:
1. At a minimum, all data should be provided to the city in the General Bike Share Feed Specification (GBFS) format. In addition to GBFS, cities ensure that additional data fields that record small vehicle location are also required. Cities should be aware that GBFS cannot measure maintenance status, small vehicle condition, or record customer complaint reports. In developing data standards and adding small vehicle field(s), cities should look to the data requirements created by Los Angeles, Chicago, and Washington DC.
   - Los Angeles: https://github.com/CityOfLosAngeles/mobility-data-specification
   - Washington DC: *To be released—contact DDOT directly.*
   - Chicago: https://chicago.github.io/dockless-bikeshare-reporting-manual/
   - GBFS: https://github.com/NABSA/gbfs
2. Additionally, cities should retain the right to request aggregated reports on system use, compliance, and other aspects of operations (e.g. parking complaints, crashes, damaged or lost small vehicles). Cities should request the data in any reports to be provided in .csv, .exls, .exlsm, or similar format, in addition to the report format.
3. Cities shall require that companies make anonymized trip data available to the public for use in creating apps that are not affiliated with the companies or city.

Process:
1. All data shall be provided directly to the city, or to a city-approved 3rd party data aggregator such as Shared Streets, or university/academic institution.
2. Cities should retain the right to require that companies send an opt-in user survey to all users and to provide input into survey questions.
3. At a minimum, aggregated data shall be provided to the city on a weekly basis, or at a timeframe specified by the city.
4. Cities should require companies to retain all records in full accordance with local and state records retention policies.

Data Quality and Accuracy
1. In order to accurately convey small vehicle location, use patterns, and other information, all small vehicles shall ping, at a minimum every 90 seconds while in use.
2. In order to ensure that small vehicle locations are known even when the small vehicle is not in use, all data shall be provided by GPS equipment that is affixed to the company's small vehicle (e.g. not customer phones). This does not include phone-based location services information, used by customers, to locate a small vehicle or track their own personal route.

Data Privacy
1. All companies must ensure customer data privacy and that company policies are in accordance with city data privacy policies.
2. Cities should require companies to provide a clear, written justification for why they need access to each type of customer files (e.g. contacts, camera, photos, location, other apps etc.)

3. Customers shall not be required to share personal data with 3rd parties (e.g. advertisers, investors etc.) in order to use the mobility services.
4. Customers shall not be required to provide access to their contacts, camera, photos, files and other private data to use the mobility service. Location services may be required to use the service for the purpose of locating nearby vehicles, but not for providing trip-level data. For camera and photo access, cities should encourage companies to work with phone software companies to develop "only-open-when-app-is-running" options.
5. Companies must provide customers with clear, prominent notification about what data will be accessed (e.g. location services, camera, contacts, photos etc.) and explain how and why data will be used. Notification must be active (e.g. affirmative confirmation-required to continue) and should not be buried in larger terms-of-service notifications.
6. Customers may opt-in (not opt-out) to providing access to their contacts, camera, photos, files, other private data and 3rd party data sharing.

Small Vehicle Standards for the Shared-Use Context

Companies must provide small vehicles and other equipment that is safe for public use and developed for the shared-use context.

1. All small vehicles must comply with safety standards established by the CPSC and all other federal, state, and city safety standards:
   - For **regular bikes,** refer to ISO 43.150
   - For **e-bikes/electric-assist bikes,** refer to CPSC Public Law 107-309 for Low Speed Electric Bicycles for maximum engine wattage. Please note that these standards are evolving.
   - For **scooters**, refer to CPSC in Public Law 107-309 for standards around for weight bearing. Please note that these standards are evolving.
2. In addition to safety standards established by the CPSC, companies must provide small vehicles that meets all state and local safety standards.
3. For all electric-assist small vehicles (e.g. e-bikes, e-scooters), the maximum motor-assist speed shall be 15mph.
4. All small vehicles must have always-on front and back lights that are visible from a distance of at least 300 feet under normal atmospheric conditions at night. Front and rear lights must stay illuminated for at least 90 seconds after the bike has stopped.
5. All small vehicles must have, and clearly display, a unique, permanent identification number that is provided to the city.
6. Companies must ensure that all small vehicles are inspected, maintained, and/or replaced on a mutually agreed-upon schedule with the city.
7. Companies have the ability to remotely lock-down individual small vehicles (e.g. when they are deemed/reported unsafe.)

Policy areas where issues should be evaluated at a local level

In developing regulatory frameworks for managing Shared Active Transportation on city streets, cities and municipalities should also address key questions around space in the right-of-way and how to best provide engagement and equity focused programming. Reconciling these question in ways that best meets local needs and context is essential to the success of any Shared Active Transportation program. This section outlines current known strategies and provides examples that cities should consider in developing permits, licenses, contracts, and pilots.

In this section:

Small Vehicle Parking
      Locking Options
      Where in the Right of Way?
      How can space be provided or marked?
Community Engagement and Equity Programs
      Discount Programs
      Engagement Programs

Small Vehicle Parking

Despite being "dockless," allowing Shared Active Transportation companies and customers to leave small vehicles on public property requires cities and local governments to designate places where those small vehicles may be parked. In some cities, Shared Active Transportation parking is unrestricted or "free floating," meaning that customers can leave bikes and scooters anywhere. In other cities, companies are required to tell their customers to only leave bikes and scooters in the curb strip or furniture zone, although enforcement abilities are limited. Most recently, a few cities have required that all dockless bike share bikes include a "lock-to" option in order to create a more orderly system.

Currently, the limitations of GPS and geo-fencing technologies means that there is not a comprehensive, remote/data-based way to enforce small vehicle parking locations. Typically, GPS can determine locations within about 5'-10' but not to the finer degree of accuracy needed for enforcement. Most cities rely on reported problems and spot-checks to assess compliance. As geofencing technologies are improved and refined, it may be possible to use it to ensure parking locations.

Locking Options

> ### Unrestricted
>
> **Small vehicles (e.g. bikes and scooters) can be left anywhere that doesn't block ADA-required sidewalk space.**
>
> | **Pros** | **Cons** |
> |---|---|
> | • Small vehicles can be left anywhere which makes point to point trips easier.
• The program is simple to understand. | • Parked small vehicles can easily end up blocking sidewalks, driveways, crosswalks which can reduce space and impede access for pedestrians, especially people with disabilities.
• Reports of "clutter" can impact the image of the program. |
>
> **Other considerations**
> • If small vehicles are often parked incorrectly and block accessible travel paths space and access in the public ROW, this may also open the government to potential lawsuits.

Encouraged Placement

Small vehicles can be left most places with some limitations and can depend on the geographic area (e.g. only in the "furniture zone," or more restrictions in crowded pedestrian areas like CBDs)

Pros
- Small vehicles can be left in most places which makes point to point trips easier. The program is relatively simple to understand.

Cons
- Can be difficult to inform and explain to all customers where small vehicles can be left.

Other considerations
- Cannot enforce remotely or via data, must rely on reports or inspections.

Lock-to

Small vehicles are required to be locked to a fixed object.

Pros
- Small vehicles are left in orderly fashion and do not block pedestrian access.

Cons
- Small vehicle parking opportunities may be limited. Using existing racks for shared-use small vehicles may limit supply for personal bikes.

Other considerations
- Cities may need to increase overall bike parking options, or require companies to provide small vehicle parking, in order to accommodate increased demand.

Where in the Right-of-Way?

No matter how a city choses to regulate parking for Shared Active Transportation small vehicles, they have many options for where that parking can go.

In the Street

Small vehicles are parked within a demarcated space on the street, such as in a car-parking spot. Some cities have repurposed no-parking zones near intersections for bike and bike share parking, as they have a lower profile and do not interfere with the line of sight for pedestrians or drivers.

Pros
- Keeps small vehicles away from pedestrian movement and does not impact ADA access.
- Can improve or preserve sightlines for crossings (especially if an area where cars frequently illegally park). When considered in light of traffic safety plans, on-street bike parking can help to calm traffic (see NACTO: Bike Share Siting Guide)

Cons
- May get pushback on actual or perceived removal of parking.
- If using fixed racks, companies and/or cities will need to develop maintenance agreements with local/private entities to address typical issues like trash and snow removal.

Other considerations
- Many cities choose to demarcate on-street bike parking with signage, planters, or flexible delineators to increase visibility and provide some protection from moving vehicles. (See Corrals)

On the Sidewalk

Small vehicles are parked anywhere on the sidewalk or pedestrian plazas.

Pros
- People are used to racks on sidewalks.
- Does not take car parking.

Cons
- Takes space away from pedestrians and can impede pedestrian and ADA access.
- Small vehicles can easily fall and begin to block the pedestrian clear path. Improper small vehicle parking, even by a few inches, can significantly degrade pedestrian access.
- Many sidewalks are too narrow for provide bike parking and retain 6' pedestrian clear path. (see NACTO: Bike Share Siting Guide)

Other considerations
- Bike parking on the sidewalk may encourage sidewalk riding, which is illegal for adults in many cities. A potential unintended consequence is that minor infractions, such as sidewalk riding, are often disproportionately enforced in communities of color.
- Companies will need to develop and actively publicize clear, multi-language instructions to explain to people which parts of the sidewalk are acceptable for small vehicle parking. E.g. many cities only allow small vehicles to park in the "furniture zone" (the portion of sidewalk between where people walk and the curb, often where you'll find other street signs, street furniture, trees, parking meters, etc.) but this concept is not widely understood.

How can space be provided or marked?
Providing clarity around where small vehicles can or should be left is essential to a successful program.

Painted Boxes

Pros
- Inexpensive and quick to install with in-house crews, can put many throughout a city or district.
- Unique/interesting sidewalk treatment that provides an opportunity for branding and creativity.
- Offers some predictability to Shared Active Transportation systems. Multiple companies can and should share the same space.

Cons
- Paint will wear out over time and boxes may be less clearly understood as small vehicle parking.
- May not fully address "clutter" issue as small vehicles are not locked to anything and may easily fall over or be parked outside the box.
- Some cities may find it challenging to align contractors for small jobs.
- If on the sidewalk, boxes should only be considered on wide sidewalks or places with very limited pedestrian activity.

Other considerations
- Since these will only be useful to Shared Active Transportation vehicles (as opposed to personal bikes or scooters), cities may want to require that the companies to pay the planning and materials associated with this treatment.
- Cities will have to allocate staff time to identify locations and conduct necessary outreach with communities.
- For signage, consider having a neutral color/design, or having multiple logos on each sign.
- If requiring that small vehicles only be left in boxes and/or other designated areas, follow NACTO station density guidelines.

Street Corrals

Pros
- Relatively inexpensive and quick to install with in-house crews, can put many throughout a city or district.
- Easy to understand as Shared Active Transportation parking and can serve as additional parking for personal bikes as well.
- Offers predictability. Multiple companies can and should share the same racks.
- Ensures that Shared Active Transportation vehicles do not impede pedestrian clear-path or sidewalk.
- Addresses "clutter" issue.

Cons
- Typically takes parking (when placed in the street).

Other considerations
- Cities should not repurpose existing bike corrals (and racks) for Shared Active Transportation as that significantly limits bike parking availability for people using their own personal bikes.
- Cities will have to allocate staff time to identify locations and conduct necessary outreach with communities.
- Cities should consider rack costs when determining permit or license fees.
- Companies will need to guarantee maintenance or enter into a maintenance agreement with other private entity (typical issues include trash and snow removal). Cities using Street Corrals should ensure that maintenance responsibilities are spelled out in permits and licenses.
- If requiring that small vehicles only be left in corrals and/or other designated areas, follow NACTO station density guidelines.

Signed Sidewalk Racks

Pros
- Relatively inexpensive and quick to install with in-house crews, can put many throughout a city or district.
- Easy to understand as Shared Active Transportation parking and can serve as additional parking for personal bikes as well.
- Offers predictability. Multiple companies can and should share the same racks.
- Addresses "clutter" issue.

Cons
- Only viable on wide sidewalks or places with very limited pedestrian activity.

Other considerations
- Cities should not repurpose existing bike corrals (and racks) for Shared Active Transportation as that significantly limits bike parking availability for people using their own personal bikes.
- Cities will have to allocate staff time to identify locations and conduct necessary outreach with communities.
- If racks are only meant for Shared Active Transportation vehicles (as opposed to personal bikes or scooters), cities may want to require that the companies pay for the planning and materials associated with this treatment.
- Cities should consider rack costs when determining permit or license fees.
- For signage, consider having a neutral color/design, or having multiple logos on each sign.
- If requiring that small vehicles only be left at racks and/or other designated areas, follow NACTO station density guidelines.

Geo-Fencing

Pros
- Requires no physical installation of equipment
- Provides some control over parking where conflicts are likely to occur (i.e. high pedestrian traffic areas, aesthetically-focused landmarks)
- Can easily designate large areas where small vehicles are not allowed (e.g., neighboring municipalities, campuses)

Cons
- Accuracy is limited and insufficient to assess compliance on a street level. There have been numerous issues reported with app and data accuracy —"ghost" or missing bikes, more bikes than shown on the app, bikes not where the app shows them to be etc.
- User must open app when ending ride to look for geo-fenced areas. Opening the app is not currently required to end the ride, so user may not do this.
- Does not address "clutter" concerns.

Other considerations
- The accuracy limitations make geo-fencing a better tool for assessing neighborhood-level behavior, not exact street location.
- Companies must explain to users how and where geo-fencing is used (e.g., via app notifications, in-app map, email/text notification, language on bikes, signage on streets)
- If requiring that small vehicles only be left at geo-fenced areas and/or other designated areas, follow NACTO station density guidelines.
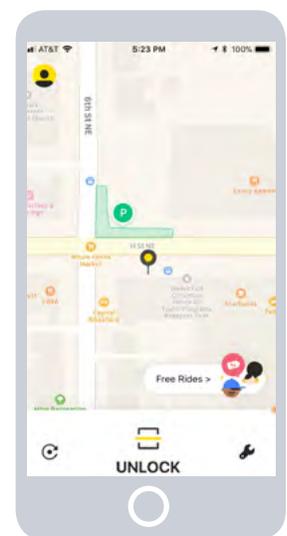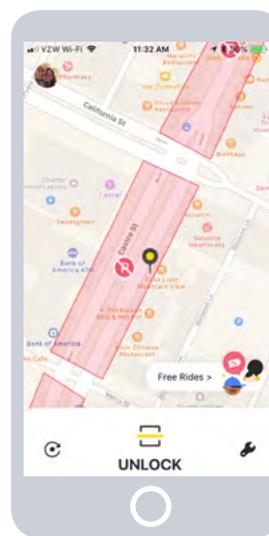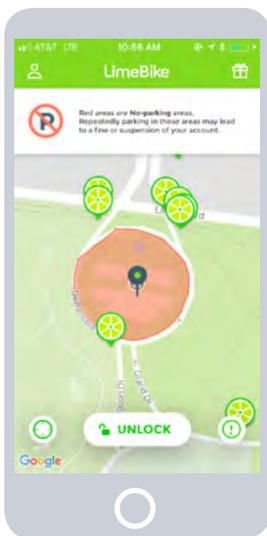
Community Engagement and Equity Programs

In order to meet the mobility needs of their residents, cities with Shared Active Transportation systems must also focus policies and programs that ensure that these transportation systems are understood and can be used by all. Today, most cities and local governments require Shared Active Transportation companies operating in the public right-of-way to participate in public engagement efforts and provide pricing options that address the needs of low-income residents. This focus on equity, and developing appropriate programs and policies, make it possible for Shared Active Transportation to provide real transportation options to all residents.

Regardless of technology or operator, introducing or expanding Shared Active Transportation options provides cities with opportunities to develop, require, and fund necessary equity and engagement programing that can increase ridership and help meet mobility needs. In contract-based systems and those developed through competitive procurement processes, meaningful engagement programming can be achieved through contract language or agreements within a robust public-private partnership. In permit or license-based systems, milestones and incentives may be an effective mechanism. For example, the St. Louis permit does not allow Shared Active Transportation companies to expand their fleets unless certain equity-focused programming is developed and implemented.

This section provides an overview of discount and engagement programs and policies that cities should consider as they manage Shared Active Transportation companies operating in their jurisdictions. More information is available in publications produced by the Better Bike Share Partnership.

Discount Programs
While there are many kinds of price discounts (e.g. student discounts, employee discounts etc.), equity-focused discounts are designed to reduce prices for low-income individuals. **Verification of who is low-income may be done in a variety of ways but all require strong coordination between government and the private sector.**

Tips for Income Verification

- Verification should be done in a fashion that is easy and fair (e.g. minimal steps, not subjective, does not take longer than a few minutes) for both the applicant and administrator.
- Verification should not require individuals to share personal information via unsecure methods, such as sending personal information or documents via email.
- The presence of income-based discounts, and what information is needed to qualify for them should be clear, well publicized, and available in, at a minimum, all languages required by the city.

Examples of Income-Based Discount Program Mechanisms:
- **Government Benefit ID (e.g. SNAP, TANF, WIC)**
  Examples:
  Philadelphia Indego AccessPass
  Detroit MoGo AccessPass
  Metro-Boston Blue Bikes Income-Eligible Program
  SFMTA Muni Lifeline Transit Pass for GoBike
- **Proof of Public Housing residence**
  Examples:
  New York and Jersey City Citi Bike NYCHA and JCHA discount
- **Community Development Credit Union membership**
  Examples:
  Washington DC Capital Bike Share Bank on DC program
  NYC Citi Bike CDCU discount program
- **Discount code distributed via designated community groups or service providers**
  Examples:
  Portland OR's Biketown for All
  Capital Bikeshare Community Partners Program
- **In-person or phone verification**
  Examples:
  Metro-Boston Blue Bikes Guided Enrollment
  Bay Area Ford GoBike Bike Share for All Program

In addition to providing reduce fares, some station-based systems, such as Philadelphia's Indego Bike Share and Detroit's MoGo Bike Share have developed cash-payment options via PayNearMe to address disparities in credit card access. Some "dockless" systems have also developed a cash-payment option for their services but, to date, they require income verification processes that put customers' personal information at risk (e.g. require customers to email copies of their photo ID, name, and proof of low income status, such as EBT card).

For systems that rely on smartphones to locate and unlock bikes, cities may want to require companies to develop options for people who do not have smartphones.

Engagement Programs
As new mobility options emerge, cities may want to require companies to provide community engagement and education programming to offset the burden to the city of explaining what is going on. Cities should also ensure that education and engagement efforts are provided in all the languages commonly spoken in the area.

Examples of education and engagement programming include:
- Company participation or attendance at public events and meetings
- Company participation or attendance at community-led events or gatherings
- Company participation or provision of bike education classes, distributed equitably throughout all neighborhoods
- Companies partner with job-training programs, youth programs
- Multilingual mobile app and/or other interfaces, as applicable
- Companies pursue grants with municipal and/or non-profit organizations to develop ambassador programs