



# From Listening to Action:

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Recommendations for Socially  
Responsible Banking in San Francisco

**2025 REPORT**



## Background

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The Office of Treasurer & Tax Collector (TTX) is responsible for the tax collection, banking, and investment activities of the City and County of San Francisco. The Office makes extensive use of banking services to collect, disburse and manage its cash, investments, payables, and receivables. TTX has a history of innovating in the banking sector, leveraging banking partners' technology and expertise to secure more affordable and reliable services for city departments and citizens. TTX has also worked to strengthen the financial wellbeing of all San Franciscans through efforts like the Working Families Tax Credit, Bank On San Francisco, financial counseling, Kindergarten to College, and fine and fee reform. Years ago, Treasurer Cisneros determined that TTX had a unique opportunity to encourage banks to do more to equitably serve consumers who have often been left out of the financial mainstream, including low-income communities and communities of color. This was the start of San Francisco's [Socially Responsible Banking](#) (SRB) initiative.

## SRB Process

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Under the Treasurer's leadership, social responsibility metrics are included in the City's assessment and selection of banking partners, and SRB is an integral part of the City's ongoing work with contracted banks. In 2011, San Francisco was one of the first jurisdictions to include social responsibility metrics in the City's banking request for proposals (RFP). The [2021 banking RFP](#) placed an even greater emphasis on SRB and included a blueprint for ongoing SRB work throughout the 10-year contract period. The City's banking partners have committed to collaborating with TTX to gather community input on their financial service needs and obstacles to full financial inclusion. Together, the banks and TTX will identify opportunities for improvement and develop action plans to address these gaps. TTX will work closely with the City's banking partners to assess progress toward these goals and create benchmarks for ongoing progress.

Each of San Francisco's three contracted banks – JPMorgan Chase (JPMC), Bank of America, and US Bank – will go through its own SRB process, each learning from the others and aiming to respond to evolving community needs. JPMC was the first of the city's banking partners to embark on an SRB process. TTX worked with JPMC to convene a series of three listening sessions focused on the financial services needs of consumers, small businesses, and government. Although JPMC attended these listening sessions, the feedback provided by community stakeholders represents experiences across the financial services community, not specific to any one bank.

## Goals of this Report

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**This report has two aims:**

1. Summarize the major themes from the listening sessions, with an emphasis on findings from the consumer and small business sessions.
2. Outline TTX's priorities to address concerns raised in the listening sessions.

2025 has ushered in monumental changes in the regulatory environment. These changes may present more flexibility for financial institutions, and they also amplify the City's commitment to ensuring that financial institutions equitably serve low-income communities, communities of color, and small businesses.

## About the Listening Sessions

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From March – June 2024, TTX convened three listening sessions focused on the banking and financial services needs of consumers, small businesses, and government departments. In preparation, the TTX team held open-ended learning conversations with more than 25 stakeholders from diverse community-based organizations, other city departments, financial regulators, consumers, and small business owners. The TTX team built an agenda for each listening session based on the major areas of concern identified in these learning calls. The listening sessions were well attended by:

- Consumers
- Small business owners
- Community based organizations
- Advocates
- City staff from TTX and other departments
- JPMC staff and leadership

JPMC staff and leadership attended the listening sessions, provided brief presentations on their existing efforts to reach underserved communities, and answered participants' questions.



A photograph of three people in a meeting. On the left, a Black man with glasses is looking towards the center. In the middle, a man with glasses and a beard is looking towards the right. On the right, a woman wearing a green hijab is looking towards the center. They appear to be in a collaborative discussion.


# Hearing Community Needs:

## Findings from the SRB Listening Sessions

This section summarizes key ideas from the SRB listening sessions. Ideas from stakeholders are presented in shaded, “What We Heard” boxes, with additional commentary or context appearing in the unshaded text.

## Consumer Banking Needs

### BRANCHES

 **WHAT WE HEARD** During the SRB listening session, community stakeholders raised concerns about access to bank branches near their homes and places of work and expressed a need for more affordable, safe financial services within their neighborhoods. Stakeholders shared that in some of their lower-income neighborhoods, particularly in communities of color, there are very few bank branches but many fringe financial institutions, such as payday lenders and check cashers. Because traveling to other parts of the city to bank can be time consuming and burdensome, some consumers have little choice but to turn to these high-cost outfits for their banking needs.

The average payday loan in California carries an APR of 372%,<sup>1</sup> and check cashers can charge up to 3% of the check’s value for payroll or government checks and up to 12% for personal checks.<sup>2</sup> For a minimum wage worker in San Francisco, this is \$44.81 per biweekly paycheck, adding up to more than \$1,100 per year.

## ACCOUNT SCREENING

« WHAT WE HEARD Community stakeholders shared that having a negative record in account screening systems like ChexSystems or Early Warning Services (EWS) is a major barrier to banking.

ChexSystems and EWS exclude hundreds of thousands of people from accessing retail bank accounts, often due to relatively small infractions like bouncing a check or incurring an overdraft fee.<sup>3,4</sup> Accruing repeated overdraft fees, falling victim to fraud, or even bank error can result in an involuntary account closure, and once a customer has a negative screening report, it can be extremely difficult to resolve issues [through the dispute resolution process](#).<sup>5</sup>

## ID REQUIREMENTS

« WHAT WE HEARD Stakeholders noted that many low-income individuals and immigrants struggle to obtain traditional IDs, posing a major barrier to bank accounts. Listening session participants indicated that customers would benefit from being able to bank using an Individual Taxpayer Identification Number (ITIN), student ID, and other alternative forms of ID.


Indeed, federal law mandates that financial institutions verify customers' identity but doesn't specify which documents must be used. This allows banks to accept both standard IDs (like driver's licenses, state IDs, and passports) and alternative forms (such as tribal IDs, Matricula Consular cards, and employer or student IDs), provided they offer sufficient verification.

« WHAT WE HEARD Although each financial institution has an ID policy, stakeholders indicated that in practice, there is variation in which IDs are accepted from branch to branch and even among the staff within a single branch.

Such variation can leave consumers reluctant to utilize banking services, for fear of being turned away.<sup>4</sup>


« WHAT WE HEARD A positive example raised in the listening sessions highlights the potential for financial institutions to partner with city departments to innovate around ID requirements. JPMC has partnered with the City and County of San Francisco to accept the Sheriff-issued jail bracelet as identification for reentering individuals to cash their checks from the San Francisco Sheriff's Office.

## FEES


 **WHAT WE HEARD** Stakeholders shared that overdraft, non-sufficient funds, and minimum balance fees can be unpredictable and detrimental to consumers. These fees can exacerbate the financial difficulties that caused a consumer's balance to drop in the first place. For instance, a consumer shared the example of losing his job, causing his checking account balance to drop, only to be surprised by a \$25 fee for falling below the required minimum balance.

Depending on a financial institution's policies, customers can rack up multiple such fees within a single day and face additional charges if their account balance remains negative for an extended period. Variation in fee amounts and policies across financial intuitions can make it challenging to understand and predict these fees, which are experienced disproportionately by customers who are lower income, less educated, non-white, and have lower credit scores.<sup>6</sup>


## CUSTOMER SERVICE

 **WHAT WE HEARD** Stakeholders indicated that customer service and clear communication are essential ingredients for financial inclusion. They described banking experiences where consumers felt unwelcome or were even asked to leave based on their appearance or manner of dress. On the other hand, stakeholders noted that warm, welcoming, and inclusive customer service fosters trust and enhances access. Participants emphasized the importance of having branch staff who not only speak the languages of their clients but also have an understanding of the community's culture and values.

## COMMUNICATIONS

 **WHAT WE HEARD** Stakeholders also stressed the importance of clear, simply worded information about bank accounts, including fees, contracts, and disclosures. They noted that confusing financial terminology may fuel consumers' surprise or limited understanding of fees and account terms.

## NONCUSTODIAL YOUTH ACCOUNTS


 **WHAT WE HEARD** Stakeholders identified financial products that could expand banking access and support customers in achieving their financial goals. They emphasized the value of noncustodial, sole-owned youth accounts with transaction capabilities.

Expanding banking access for youth would enhance financial literacy, allow individuals over the age of 16 who are employed to deposit their earnings, and ensure that foster youth and those with undocumented parents can access banking services. Helping youth access financial services can provide benefits to customers and to Banks themselves, including building goodwill and establishing relationships that can extend into the future.<sup>7</sup> Additionally, stakeholders highlighted the need for “bridge” products to assist low- and moderate-income customers in progressing financially once they are ready to transition beyond entry-level accounts.


## Small Businesses Banking Needs

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### BRANCHES

 **WHAT WE HEARD** Like consumers, small business stakeholders underscored the importance of physical bank branch access. Branches help small businesses build banking relationships and conveniently meet daily needs. Branch closures can lead to logistical challenges and inconveniences for small businesses that need to safely and regularly deposit cash.


### COMMUNITY EVENTS

 **WHAT WE HEARD** Beyond branches, stakeholders underscored the benefits of financial institutions establishing a presence in their communities in other ways, such as by participating in and supporting local events. Participants noted local branch staff’s involvement in Carnevale, Pride, and Lunar New Year celebrations and memorable examples. Stakeholders encouraged more engagement of this kind to build trust, strengthen relationships, and change perceptions that “the bank is not for me.”


## CUSTOMER SERVICE AND COMMUNICATIONS


 **WHAT WE HEARD** Small business stakeholders also echoed consumers on the importance of accessible, inclusive customer service and communications. Small business owners shared that they value engaging with staff that present themselves as relatable and welcoming, rather than smug or condescending. It is also important for branch services to be available in languages other than English, in particular Spanish and Chinese.

Limited English proficiency can serve as a major barrier to banking, including when institutions do not provide translated materials and interpretation services.<sup>8</sup> Difficulties consistently and accurately translating technical terms can also produce challenges and contribute to households in which the primary language spoken is not English being unbanked.<sup>8,9</sup>

 **WHAT WE HEARD** A key dimension of customer service, stakeholders noted an appreciation of person-to-person assistance with small business loans. In instances where a loan is declined, stakeholders noted that it is important for bank staff to offer warm referrals to resources, including community development financial institutions (CDFIs).


## COMMUNICATIONS

 **WHAT WE HEARD** Stakeholders indicated that a lack of transparency around loan documentation requirements can prevent small businesses from efficiently identifying the best institutions for their needs. A service provider gave an example of a small business owner going through a lengthy loan application process only to be told at the very end that as an ITIN holder, she was not eligible. The business owner went on to secure capital from a different financial institution, as her financials were strong. In this vein, stakeholders saw a need for financial institutions to provide clear materials and greater transparency about all requirements for loans and financial products.


 **WHAT WE HEARD** Small business stakeholders were also surprised to learn about certain existing financial products, including business bank accounts, credit cards, and loans. They identified an opportunity for financial institutions to more clearly and effectively target outreach and advertising to their communities.




## TECHNICAL RESOURCES

 **WHAT WE HEARD** Stakeholders identified a need to make account documents easily accessible via the bank's online portal for the entire seven-year period during which the IRS may conduct an audit.


## FEES

 **WHAT WE HEARD** Small businesses view credit card swipe fees as a significant burden, particularly given their often-narrow profit margins. Stakeholders suggested that banks offer a discounted swipe fee for their small business banking customers.


Swipe fees are often of the largest monthly expenses of a small business.<sup>10</sup> Fee amounts primarily imposed by credit card brands such as Mastercard, Visa, and American Express, can vary widely depending on the rewards associated with the credit card presented by the customer. This variability and unpredictability can contribute to small businesses' financial strain.

 **WHAT WE HEARD** Stakeholders also noted that fees for check cashing can negatively affect their employees. Many restaurant workers, for example, remain unbanked and are charged high fees when they seek to cash their paychecks. Stakeholders suggested that financial institutions could address this community need by waiving or reducing fees to cash paychecks for local businesses.


## ACCESS TO CAPITAL

 **WHAT WE HEARD** Stakeholders noted that small businesses would greatly benefit from access to startup and expansion funding, while maintaining the separation between personal credit and business credit. They emphasized a need for small loans, sometimes as low as \$1,000 to \$5,000, to support business growth.

Currently, many small business owners rely on personal debt to cover these types of expenses, which can blur the lines between personal and business finances.

« **WHAT WE HEARD** Many small businesses face challenges accessing capital due to a lack of traditional collateral. Stakeholders urged banks to consider alternative forms of collateral, such as consistent cash flow inventory.

## BUSINESS BANK ACCOUNTS

« **WHAT WE HEARD** Stakeholders expressed that business bank accounts are an essential foundation for small businesses. These accounts enable business owners to keep business finances separate from their personal finances and lay the groundwork to eventually apply for capital. Banks can encourage small business owners to open business accounts through targeted outreach and communications, offering incentives, and partnering with community organizations that support small businesses. Additionally, stakeholders suggested that the City can raise awareness by providing information about business bank accounts during the small business license application process and offering matching funds or other incentives to encourage account opening.



# Recommendations for Financial Institutions

We identify short-, medium-, and long-term strategies that financial institutions can employ to address the concerns that community members raised in the listening sessions and move toward full financial inclusion.

**S** Short-term strategy

**M** Medium-term strategy

**L** Long-term strategy

## Branches

As the financial landscape evolves quickly, San Francisco and the rest of the U.S. has seen a decrease in bank branches. We encourage financial institutions to maximize the value of their existing retail branches and consider expanding their presence. This will not only serve the communities' needs but also may offer banks a competitive advantage over neobanks and fintechs, which do not offer in-person services.

- S** Identify communities who would benefit from additional outreach about existing bank products and technology solutions and enhance outreach.
- M** Identify San Francisco neighborhoods with minimal financial institution presence and explore opportunities to meet financial needs of these communities.
- M** Assess gaps in customer service for online services (e.g., branch staff unable to advise on online-only products) and provide innovative solutions, such as in-person support or co-browsing service via the banking app

## Account screening

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- S** Regularly train all branch, phone, and online customer service staff on how to handle account screening issues (e.g., refer client to ChexSystems or EWS customer service, point to process for disputing errors)
- S** Regularly train staff on flexibility in account screening for Bank On San Francisco certified accounts.<sup>11,12</sup>

## ID requirements

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Although we expect that banks adhere to regulatory and legal requirements around identification and training of staff, we encourage financial institutions to go above and beyond what is required by law, to ensure easy, struggle-free access to banking services for all community members.

- S** Ensure account applications and all public-facing websites and documents include clear information on all allowable forms of ID.
- S** Regularly train all staff about ID policies, including every form of legally permissible ID to access banking products and services. Provide clear reference guide for staff's ongoing use.
- M** Expand acceptance of alternative forms of ID, including [student ID](#), ITIN, foreign passport numbers and alien identification card numbers, based on documentation provided by the [OCC](#) and [FDIC](#).

## Customer service and communications

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- S** Broadly promote existing Bank On certified accounts.
- S** Require regular banking-specific anti-bias trainings for branch staff, including examples of the customer service needs of the community.
- S** Create meaningful, ongoing, opportunities for branch staff to build relationships with local community organization staff, residents, and employees.
- S** Publicize affordable financial products and services for small businesses, including business bank accounts, credit cards, and microloans.
- M** For financial institutions that do not yet have a Bank On San Francisco certified account, [reach out](#) to the Treasurer's Office to discuss getting certified.

- L** Train branch staff to provide one-to-one guidance to clients, to ensure that each customer clearly understands the full costs and benefits of potential products or services.

## Fees: Consumer banking

- S** Clearly communicate with customers about any fees and opportunities to avoid such fees; send reminders in plain language to those at risk of incurring fees.
- L** Cash paychecks from local employers for free or for a reduced fee, regardless of which bank it comes from.
- L** Lower or remove fees for overdraft fees, nonsufficient funds, and minimum balance requirements. Some large banks, including Citibank and Bank of America, are leading the way by eliminating or dramatically lowering overdraft fees. The figure below summarizes overdraft fees at CCSF-contracted banks.

### OVERDRAFT FEES AT CCSF-CONTRACTED BANKS

Importantly, each of these banks offers a [Bank On San Francisco](#) certified account with no overdraft fees. The following table summarizes overdraft fees for standard checking accounts that provide overdraft protections, per public information provided on the banks' websites:

BANK	OVERDRAFT FEE	NOTES
<a href="#">Citibank</a>	None	Citibank <a href="#">eliminated</a> overdraft fees in 2022.
<a href="#">Bank of America</a>	\$10*	Fee per transaction. <a href="#">Reduced from \$35</a> in 2022. Maximum of 2 per day (\$20/day)
<a href="#">JPMorgan Chase</a>	\$34*	Fee per transaction that overdraws account by >\$50. Maximum of 3 per day (\$102/day).
<a href="#">U.S. Bank</a>	\$36*	Fee per transaction that overdraws account by >\$50. Maximum of 3 per day (\$108/day)

Current as of August 2025

\* Exceptions apply (e.g., minimum value of purchase to trigger fee). See individual banks' sites for details.



## Fees: Small businesses

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- L** Larger banks can explore the possibility of lowering credit card swipe fees for their small business banking clients, in partnership with Visa, Mastercard, and American Express.

## Noncustodial youth accounts

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- M** Accept government issued student IDs as primary identification.
- M** Offer noncustodial, sole-owned youth accounts for 16- and 17-year-olds. Banks and credit unions, including Bank of America, are leading the way by offering noncustodial accounts to youth under 18. See examples of existing non-custodial youth accounts here: [sftreasurer.org/youth](https://sftreasurer.org/youth)

## Capital for small businesses

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- S** Create clear documentation about the requirements to apply for capital, including a “How to” guide of what materials are required and how the application will be evaluated, written in plain language. Make this resource easily accessible online and share with community organizations.
- S** Partner with community organizations that provide education and resources to small businesses: Share warm referrals to and from these organizations; share information so these organizations have clear information about your products, services, and underwriting processes.
- L** Utilize cash flow and other non-traditional forms of collateral in lieu of standard collateral, to the extent possible. If appropriate, partner with CDFIs to provide loans as needed, while continuing to offer other small business banking services through the financial institution.



# Conclusion & Next Steps

This report identifies a variety of challenges that San Francisco consumers and small businesses experience in securing affordable financial products and services. We made realistic and actionable recommendations to enable financial institutions to better serve the whole community.

The Treasurer's Office is committed to moving toward full financial inclusion and economic wellbeing for all members of the San Francisco community. Our commitments in this ongoing work include:

- **Listen to community.** Our office will continue listening to and learning from our community members, both through formal channels like listening sessions and by learning from our financial counselors, peer cities, and community partners.
- **Partner with financial institutions to pursue socially responsible banking.** We will continue working with the city's banking partners and other financial institutions to pursue responsive innovations to address the community's evolving needs. This includes collecting data from city contracted banks to assess ongoing progress toward their SRB goals.
- **Provide free services to build community financial wellbeing.** We will continue providing [free, confidential financial counseling](#) and connecting consumers with safe, affordable bank accounts through [Bank On San Francisco](#).
- **Share innovations & impacts.** We will continue to freely share about our ongoing SRB efforts with the community and peer cities through our website, reports, and presentations.

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## About the San Francisco Office of the Treasurer & Tax Collector



**Treasurer & Tax Collector**  
CITY AND COUNTY OF SAN FRANCISCO

The Office of the Treasurer & Tax Collector serves as the banker, tax collector, collection agent, and investment officer for the City and County of San Francisco. As the entity responsible for safeguarding the City's money, the Office uses this expertise and authority to assist San Francisco residents through award-winning programs and initiatives that help low-income families build economic security and mobility.

Learn more about our SRB work at  
[sftreasurer.org/banking-investments/socially-responsible-banking](https://sftreasurer.org/banking-investments/socially-responsible-banking).

## Acknowledgments

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This report was prepared by Rebecca Loya, San Francisco Treasurer's Office